

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

Aquilla Canada and Dranel Clark,	)	
	)	
Complainants,	)	
	)	
v.	)	<b><u>File No: EC-2026-0131</u></b>
	)	
Union Electric Company d/b/a	)	
Ameren Missouri,	)	
	)	
Respondent.	)	

**STAFF REPORT**

**COMES NOW**, the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and for its *Staff Report*, states as follows:

1. On November 19, 2025, Aquilla Canada and Dranel Clark (“Complainants”) filed their *Formal Complaint* (“Complaint”) against Union Electric Company, d/b/a/ Ameren Missouri (“Ameren” or “Respondent”) alleging unlawful billing practices and violations of federal and state law, including the Americans with Disabilities Act.<sup>1</sup>

2. On December 2, 2025, the Commission entered an order directing Staff to file its investigation report or a status report indicating when it expects to file its investigation report by January 5, 2026. The order directed Ameren to file an answer to the complaint or request mediation no later than January 2, 2026.

3. On December 30, 2025, Ameren filed its *Answer to Complaint* with affirmative defenses and requested the Commission dismiss the Complaint.

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<sup>1</sup> Section 504 of the Rehabilitation Act of 1973, 29 U.S.C. § 794.

4. Staff submitted Data Requests on December 10, 2025, to Ameren and Ameren submitted its respective responses on December 30, 2025.

5. On January 5, 2026, Staff filed a Status Report requesting until January 22, 2026, to file an investigative report. On January 14, 2026, the Commission ordered Staff to file its investigation report no later than January 22, 2026.

6. As detailed in the attached Confidential *Staff Report*, and incorporated herein, Staff has reviewed Complainant's formal complaint, applicable state and federal regulations, and data provided by Ameren. \*\* [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED] \*\*

**WHEREFORE**, Staff respectfully submits this Staff Report and respectfully requests the Commission accept the same, and for such other and further relief as the Commission considers just and reasonable under the circumstances.

Respectfully submitted,

**/s/ Ray Cunneen**

**Ray Cunneen**

Missouri Bar No. 77925

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Missouri Bar No. 65991

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**Attorney for Staff of the**

**Missouri Public Service Commission**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First-Class United States Postal Mail, postage prepaid, on this 22nd day of January 2026, to all counsel of record.

**/s/ Ray Cunneen**

**File No. EC-2026-0131**

**STAFF REPORT  
ATTACHMENT A**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**

**BEFORE THE PUBLIC SERVICE COMMISSION**

**OF THE STATE OF MISSOURI**

Dranel J. Clark and Acquilla Canada,

Complainants,

v.

Union Electric Company d/b/a Ameren

Missouri,

Respondent

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File No. EC-2026-0131

**AFFIDAVIT OF LOVENA JAHR**

STATE OF MISSOURI

)

ss.

COUNTY OF COLE

)

)

**COMES NOW LOVENA JAHR** and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Report in Memorandum form*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
LOVENA JAHR

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 20th day of January 2026.



  
Notary Public

**File No. EC-2026-0131**

**APPENDIX A**

**HAS BEEN DEEMED**

**CONFIDENTIAL**

**IN ITS ENTIRETY**