

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Case No. EC■2026■0128

FILED
March 9, 2026
Missouri Public
Service Commission

Brett Felber and Lisa Lambert, Complainants

v.

Ameren Missouri d/b/a Union Electric Company, Respondent

COMPLAINANTS' MOTION TO ADMIT EXHIBIT AND DEMONSTRATE TARIFF AND RULE VIOLATIONS

COME NOW Complainants Brett Felber and Lisa Lambert and respectfully move the Missouri Public Service Commission to admit the T■Mobile call records of the Complainants as evidence demonstrating that Ameren Missouri failed to comply with Missouri Public Service Commission regulations and Commission■approved tariff requirements governing customer contact prior to the disconnection of residential electric service.

The call records submitted by the Complainants establish that Ameren Missouri made only one telephone call attempt to the Complainants during the relevant timeframe prior to disconnection proceedings. These records directly contradict the procedural requirements imposed by both Missouri PSC regulations and Ameren Missouri's own Commission■approved tariff.

I. EXHIBIT OFFERED

Exhibit A – T■Mobile Call Logs reflecting inbound and outbound call activity associated with the telephone numbers of Brett Felber and Lisa Lambert. These call logs demonstrate the absence of the required number of telephone call attempts by Ameren Missouri prior to disconnection activity.

II. MISSOURI PUBLIC SERVICE COMMISSION REGULATORY REQUIREMENTS

20 CSR 4240■13.050(8) – Discontinuance of Service

The Missouri Public Service Commission has established explicit procedures utilities must follow prior to discontinuing residential electric service.

Rule language states:

“At least twenty■four (24) hours preceding discontinuance, a utility shall make reasonable efforts to contact the customer to advise the customer of the proposed discontinuance and what steps must be taken to avoid it. Reasonable efforts shall include either a written notice following the notice pursuant to

section (4), a doorhanger, or at least two (2) telephone call attempts reasonably calculated to reach the customer.”

III. AMEREN MISSOURI COMMISSION■APPROVED TARIFF REQUIREMENTS

Ameren Missouri operates under tariffs approved by the Missouri Public Service Commission. Once approved, these tariffs carry the force and effect of law and are binding upon the utility.

Ameren Missouri General Rules and Regulations – Section VII governing disconnection procedures requires the company to attempt customer contact through multiple communications prior to disconnecting service.

Tariff language provides:

“At least 24 hours preceding disconnection of service, the Company will attempt to contact a residential customer through a series of communications to advise of the pending action and what steps must be taken to avoid disconnection. Such communications will include not less than two (2) call attempts and an additional notice via the customer's elected preferred communication method. A final call attempt will be made within 24 hours of the discontinuance of service.”

IV. CLEAR REGULATORY AND TARIFF VIOLATIONS

Violation 1 – Failure to Make the Minimum Required Telephone Call Attempts

The Missouri PSC rule explicitly requires at least two telephone call attempts or other reasonable efforts to contact the customer prior to disconnection. The T■Mobile call logs demonstrate that Ameren Missouri made only a single outbound call attempt.

Violation 2 – Failure to Conduct a Series of Communications as Required by Tariff

The Ameren Missouri tariff requires a series of communications, including multiple telephone call attempts and additional notice to the customer. The call records demonstrate that no such series of communications occurred.

Violation 3 – Failure to Comply with Commission■Approved Tariff Obligations

Missouri law recognizes that utility tariffs approved by the Missouri Public Service Commission carry the force and effect of law. A utility's failure to comply with its own tariff constitutes a violation of Commission regulations and administrative law.

V. REQUEST FOR RELIEF

WHEREFORE, Complainants respectfully request that the Missouri Public Service Commission:

1. Admit Exhibit A (T-Mobile Call Logs) into the evidentiary record;
2. Find that Ameren Missouri failed to comply with 20 CSR 4240-13.050(8);
3. Find that Ameren Missouri violated its Commission-approved tariff governing customer contact prior to disconnection; and
4. Grant such additional relief as the Commission deems just and proper, including protection from disconnection while this complaint is pending.

Respectfully Submitted,

Brett Felber

Lisa Lambert