

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

File No. EC-2026-0218

Brett Felber & Lisa Lambert,

Complainants,

v.

Ameren Missouri d/b/a Union Electric Company,

Respondent,

FILED
March 30, 2026
Data Center
Missouri Public
Service Commission

COMPLAINANTS' MOTION REQUESTING NOTICE TO AND PARTICIPATION BY THE OFFICE OF THE PUBLIC COUNSEL

I. INTRODUCTION

COMES NOW the Complainants and state as follows:

This Motion raises systemic tariff violations, evidentiary deficiencies, billing inconsistencies, and misrepresentations affecting Missouri ratepayers statewide.

II. STATUTORY AND REGULATORY AUTHORITY

This matter is governed by Sections 386.390, 393.130, and 393.140 RSMo, as well as 4 CSR 240-13.015 and 4 CSR 240-13.020.

III. PRECISE TARIFF PROVISIONS AT ISSUE

Ameren Missouri P.S.C. Mo. No. 6 Electric Tariff provisions include Rule 6, Rule 7, and Rule 9.

IV. COUNTS

Count IV – Misrepresentation of Accepted Payment Methods

Respondent's billing statements authorize check payments but refuses to honor them, violating Rule 6, 4 CSR 240-13.020, 4 CSR 240-13.015, and Section 393.130 RSMo.

Such conduct is unjust, unreasonable, and unduly discriminatory under Section 393.130 RSMo.

Count V – Misrepresentation of Payment Agreements

Respondent misrepresents payment agreement terms in violation of Rule 7 and 4 CSR 240-13.020.

Count VI – Improper Mailing and Notice Practices

Respondent represents mail as First Class when it is bulk-mailed, impairing statutory notice compliance.

Count VII – Defective Disconnection Notices

Respondent issues inconsistent or noncompliant disconnect notices in violation of Rule 9 and 4 CSR 240-13.020.

Count VIII – Failure to Comply with Telephone Notice Obligations

Respondent fails to perform required telephone notice efforts prior to disconnection, violating Commission rules.

V. EXHIBIT A

February 2026 Ameren Missouri Billing Statement demonstrating authorization of check payments.

VI. PROPOSED COMMISSION ORDER

1. Honor check payments;
2. Clearly disclose restrictions;
3. File tariff revisions if needed;
4. Produce documentation;
5. Grant further relief as just and reasonable.

Respectfully submitted,

/s/ Brett Felber
/s/ Lisa Lambert

CERTIFICATE OF SERVICE

Served March 30, 2026, in accordance with 4 CSR 240-2.080.

/s/ Brett Felber