

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

Brett Felber and Lisa Lambert,
Complainants,

v.

File No. EC-2026-0218

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

COMPLAINANTS' OPPOSITION TO RESPONDENT'S MOTION TO DISMISS

I. INTRODUCTION

Respondent's claim that no live controversy exists is incorrect. This matter involves wrongful disconnection, misrepresentation, coercive payment practices, and violations of Missouri Public Service Commission regulations.

These violations are supported by audio recordings, video evidence, telephone logs, and the absence of required notices.

II. LEGAL STANDARD

Dismissal is improper where material facts are in dispute and where evidence exists that would entitle Complainants to relief. Matters requiring credibility determinations must proceed to hearing.

III. THERE IS A LIVE CONTROVERSY

Even if Respondent claims disconnection was cancelled, the underlying violations remain actionable, including improper disconnection procedures and deceptive practices.

IV. REGULATORY VIOLATIONS

Respondent violated Missouri regulations including:

- 4 CSR 240-13.030 (Disconnection procedures)
- 4 CSR 240-13.020 (Billing practices)
- 4 CSR 240-13.040 (Cold Weather Rule)

Complainants will demonstrate failures in required notice, improper call attempts, and unlawful payment restrictions.

V. EVIDENTIARY HEARING REQUIRED

This case involves disputed facts, recorded evidence, and credibility determinations requiring a formal evidentiary hearing.

VI. CONCLUSION

Respondent's Motion to Dismiss should be denied.

WHEREFORE

Complainants request:

1. Denial of Respondent's Motion to Dismiss;
2. Setting this matter for evidentiary hearing;
3. Such other relief as deemed proper.

Respectfully submitted,

Brett Felber
Lisa Lambert

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all parties of record on this April 10, 2026.

Brett Felber