

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION
Case No. EC-2026-0218

FILED
April 13, 2026
Data Center
Missouri Public
Service Commission

**MEMORANDUM IN OPPOSITION TO AMEREN MISSOURI'S MOTION TO
DISMISS**

I. INTRODUCTION

COME NOW Complainants Brett Felber and Lisa Felber and oppose Ameren Missouri's Motion to Dismiss. Ameren seeks to avoid scrutiny despite substantial, verifiable evidence including audio, video, and documentation that establishes clear violations.

II. MATERIAL FACTS AND EVIDENCE

Complainants have submitted extensive evidence pinpointing specific violations. These facts are verifiable and cannot be rebutted without evidentiary review. Dismissal at this stage ignores the existence of material factual disputes.

III. TARIFF AND REGULATORY VIOLATIONS

Ameren Missouri's actions violate multiple Missouri regulations, including:

- 4 CSR 240-13.020 – Failure to provide proper notice prior to disconnection.
- 4 CSR 240-13.050 – Improper disconnection procedures.
- Misrepresentation of payment methods.
- Failure to follow required communication protocols prior to termination.

IV. IMPROPER ATTEMPT TO AVOID ACCOUNTABILITY

Rather than addressing the evidence, Ameren attempts to dismiss this matter outright. This reflects an effort to avoid responding to substantiated violations. If transparency and accountability are maintained, Ameren should be required to answer and participate in a full evidentiary process.

V. PREJUDICE TO COMPLAINANTS

Granting dismissal would be prejudicial and deny Complainants a fair opportunity to present their case. It would also disregard substantial un rebutted evidence already before the Commission.

VI. RELATED PROCEEDINGS

The same evidence has been submitted to the Missouri Attorney General's Office under reference CC-2026-04-003167. This matter will not conclude solely through dismissal at the administrative level.

VII. REQUEST FOR RELIEF

Complainants respectfully request denial of the Motion to Dismiss, an order requiring Ameren to file a formal Answer, and that this matter be set for evidentiary hearing.

Respectfully Submitted

Brett Felber & Lisa Felber

