

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Brett Felber & Lisa Felber, Complainants

v.

Ameren Missouri, Respondent

Case No. EC-2026-0218

FILED
April 14, 2026
Missouri Public
Service Commission

MEMORANDUM TO THE COMMISSION

I. PURPOSE OF ATTORNEY GENERAL COMPLAINT NOTICE

Complainants submit this memorandum to clarify that notice of a complaint filed with the Missouri Attorney General's Office is informational only.

II. RESPONDENT'S CLAIM OF CONTRADICTORY DOCUMENTATION

Respondent has asserted, through its representative Aubrey Krcmar, that it possesses documentation contradicting the Complainants' evidence. In audio recordings submitted into EFIS as Exhibit A, Ms. Krcmar references such documentation but clearly refuses to provide it to Complainant Brett Felber upon request. This refusal is audible and unambiguous. Respondent's refusal to produce the alleged contradictory documentation supports a reasonable inference that such records either do not exist or are not consistent with Respondent's representations. Alternatively, the continued non-production raises concern that the records are incomplete or not in a finalized state suitable for disclosure. Further, to the extent such records once existed but are not produced, the Commission may apply the doctrine of spoliation and draw an adverse inference that the withheld evidence would be unfavorable to Respondent.

III. FAILURE TO PRODUCE RECORDS

Respondent has failed to provide requested billing records, call logs, and account documentation despite formal request.

IV. VIOLATION OF MISSOURI REGULATIONS

Under 20 CSR 4240-13.025(1)(C)-(E), utilities must maintain accurate records and provide them upon request.

V. VIOLATION OF FILED TARIFF

Under Ameren Missouri P.S.C. Mo. No. 6 (Sheets R-17 through R-44), Respondent must maintain and provide access to account and billing records.

VI. REQUEST FOR RELIEF

Complainants request production of all records, certification of authenticity, adverse inference if not produced, and denial of dismissal.

Respectfully submitted,

Brett Felber
Lisa Felber

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served on all parties on April 13, 2026.

Brett Felber