

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of:  
Brett Felber & Lisa Felber, Complainants,  
v.  
Ameren Missouri, Respondent.  
File No.: EC-2026-0218

**MOTION TO COMPEL PRODUCTION OF DOCUMENTS**

Complainants Brett Felber and Lisa Felber move for an order compelling Ameren Missouri to produce requested customer records pursuant to 4 CSR 240-2.090 and 4 CSR 240-2.100.

**I. INTRODUCTION**

Ameren Missouri has refused to provide basic customer records despite repeated requests and has asserted that a formal complaint requires use of discovery procedures. This position is unsupported.

**II. FACTUAL BACKGROUND**

Complainants requested billing records, mailing records, disconnect notices, and payment agreements. Ameren has refused production and conditioned access on discovery procedures.

**III. APPLICABLE TARIFFS AND CUSTOMER RIGHTS**

Ameren Missouri's tariffs grant customers the right to access their account records and contain no exception for pending complaints.

**IV. COMMISSION RULES**

Under 4 CSR 240-2.090, discovery is permitted but not required for customers to obtain their own records. Under 4 CSR 240-2.100, the Commission may compel production.

**V. ARGUMENT**

Ameren's position misstates Commission procedure and violates its tariff obligations. The refusal obstructs Complainants' ability to present their case.

**VI. REQUEST FOR RELIEF**

Complainants request that the Commission order Ameren Missouri to produce all requested records within five (5) business days and prohibit withholding based on the existence of a formal complaint.

**VII. CONCLUSION**

Ameren Missouri's refusal is unsupported and should be remedied by Commission order.

Respectfully submitted,

Brett Felber

Lisa Felber



**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served on all parties of record via the Commission's electronic filing system on April 16, 2026.

Signature: \_\_\_\_\_