

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

Brett Felber & Lisa Felber (Lambert),
Complainants,

FILED
April 20, 2026
Missouri Public
Service Commission

v.

Ameren Missouri,
Respondent.

File No. EC-2026-0218

ARGUMENT – LACK OF AUTHENTICITY AND RELIABILITY OF AMEREN EXHIBIT I-C

Ameren Missouri's Exhibit I-C lacks the foundational reliability required for evidentiary consideration and should be stricken or accorded no weight.

First, Exhibit I-C bears the same indicia of fabrication and post hoc alteration as the previously challenged exhibit submitted by Ameren in Case No. EC-2023-0395. The similarities are not coincidental; they reflect a recurring pattern of non-native document production and after-the-fact reconstruction rather than preservation of original business records.

Second, Ameren's delay of approximately nine (9) days in producing Exhibit I-C is material. That delay provided ample opportunity to alter, manipulate, edit, or otherwise reconstruct the document outside of any controlled or verifiable records system. Ameren has provided no explanation for this delay and no assurances that the exhibit reflects an unaltered, contemporaneous record.

Third, the credibility of the exhibit is further undermined by the involvement of Ameren representative Aubrey Krcmar, who is already associated with documented discrepancies in recorded communications with Mr. Felber. The same individual now purports to "emulate" records, raising substantial concerns regarding both methodology and impartiality.

Fourth, Ameren has failed to provide a chain-of-custody affidavit or any comparable evidentiary foundation establishing:

- when the document was created,
- how it was stored,
- whether it is a native record,
- and whether it has been altered.

Absent such foundational evidence, Exhibit I-C cannot be authenticated.

Fifth, Ameren has conspicuously avoided addressing substantive discrepancies, including but not limited to:

- inconsistencies in stated payment methods,
- admitted errors by its own representative,
- absence of verifiable phone call logs,
- and failure to produce a United States Postal Service date-stamped disconnect notice.

Notably, no proof of mailing or delivery consistent with standard USPS tracking or date-stamped

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documentation has been provided, further undermining the reliability of Ameren's claims.

CONCLUSION

Taken together, these deficiencies demonstrate that Exhibit I-C is not a trustworthy business record but rather an unverified, potentially altered document created outside normal recordkeeping practices.

Accordingly, Complainant respectfully requests that the Commission:

1. Strike Exhibit I-C from the record; or
2. In the alternative, assign it no evidentiary weight whatsoever.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all parties of record on this 18th day of April, 2026.

Brett Felber

Lisa Felber (Lambert)