

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

FILED
April 24, 2026
Missouri Public
Service Commission

LATRELL S. GERMANY,)

)

Complainant,)

)

v.) Case No. EC-2026-0279

) (Consolidated with GC-2026-0278)

UNION ELECTRIC COMPANY d/b/a)

AMEREN MISSOURI,)

SPIRE MISSOURI, INC., and)

MISSOURI AMERICAN WATER CO.,)

)

Respondents.)

AMENDED PLEADING: NOTICE OF MEDICAL EMERGENCY, HUMAN RIGHTS
VIOLATIONS, AND DISCHARGE OF DISPUTED DEBT

COMES NOW Latrell Shonta Germany, Complainant, appearing pro se in her individual capacity as a residential utility customer, and for her response to the Commission's Order of April 23, 2026, states as follows:

I. PRIORITY NOTICE: THE RIGHT TO LIFE AND HEALTH (20 CSR 4240-13.050)

Complainant hereby provides formal notice that she suffers from Chronic Asthma, a life-threatening respiratory condition. Under 20 CSR 4240-13.050(10), Missouri law mandates that a utility must postpone disconnection if it would aggravate an existing medical emergency. Medical Necessity for Electricity and Gas (Ameren & Spire): Complainant requires consistent climate control and air filtration. High temperatures and extreme fluctuations trigger immediate bronchial spasms. Without power for cooling and filtration, the Complainant is placed in a state of immediate physical peril.

Medical Necessity for Water (Missouri American Water): Running water is essential for medical hydration and the sanitation required to manage chronic respiratory inflammation.

Human Rights Foundation: Complainant asserts that the right to water and energy is a fundamental human right essential for the "full enjoyment of life" (UN Resolution 64/292).

Denying these services to a person with a documented medical crisis is an inhumane act that violates both state regulation and universal standards of human dignity.

II. CLARIFICATION OF STANDING AND JURISDICTION

5. In response to the Commission's Order, Complainant clarifies she is appearing as a natural person and individual consumer. The properties in question are her personal residence.

Complainant is not appearing as a "Trust" for the purpose of these proceedings, but as a customer whose health and safety are directly impacted by the Respondents' actions.

6. While the Commission noted it does not oversee landlord-tenant law, Complainant asserts that the Commission does have exclusive jurisdiction over 20 CSR 4240-13, which the Respondents have violated by failing to "promptly and thoroughly" investigate a registered dispute.

III. DISCHARGE OF DISPUTED DEBT AND LEGAL TENDER

7. The Complainant has acted in good faith to settle all accounts by issuing a Bill of Exchange. Under UCC § 3-603, a tender of payment that is refused serves to discharge the obligation. By refusing to return the instrument or credit the account, Respondents have effectively accepted the discharge.

8. 15 U.S.C. § 1692g: Once Complainant disputed the debt in writing, Respondents were required to cease collection until they provided a certified Life of Account Ledger. Respondents have failed to provide this validation, yet continue to use the threat of service termination—during a medical emergency—as a coercive collection tool.

9. Constitutional Tender: Under Article I, Section 10 of the U.S. Constitution, no State shall make anything but gold and silver coin a tender in payment of debts. Respondents' excessive demands for specific currency forms while refusing good-faith commercial settlement instruments is a violation of lawful commerce.

IV. RELIEF REQUESTED

Complainant moves the Commission for an Order:

Immediately Restoring All Services at [REDACTED] to prevent a life-threatening health crisis;

Compelling Respondents to provide a certified accounting and respond to the Bill of Exchange;

and

Staying all collection activities until the Commission determines the validity of the discharged debt.

Respectfully submitted,

/s/ Latrell Shonta Germany

Latrell Shonta Germany

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was filed via EFIS and mailed to the legal departments of Ameren Missouri, Spire Missouri, Inc., and Missouri American Water on this 24th day of April, 2026.

/s/ Latrell Shonta Germany