

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

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.)

COMPLAINANT'S DEFINITIVE STATEMENT OF FACTS AND RESPONSE TO
MOTION FOR CLARIFICATION

COMES NOW Latrell S. Germany, appearing strictly as a natural person, consumer, and residential customer of record, for her More Definitive Statement of Facts in response to the Commission's Order and Respondent Spire's Motion for Clarification, stating as follows:

I. STATUS OF COMPLAINANT AND NOTICE OF PRIOR KNOWLEDGE

Natural Person Standing: Complainant clarifies that she is a natural person and a "consumer" as defined by the Fair Debt Collection Practices Act (FDCPA) and a "customer" under 20 CSR 4240-13.015.

Prior Medical Notice: Respondents, specifically Spire Missouri, American Water and Ameren Missouri, have prior actual knowledge of Complainant's life-threatening Chronic Asthma. Complainant has previously submitted doctor-authorized forms for energy assistance and medical reconnection. Respondents were aware of this condition long before the current dispute, yet proceeded with threats of termination in bad faith.

Request for Account Transfer: Complainant has formally requested that the accounts in question be updated and placed in the name of the Germany Family Trust. To date, Respondents have failed to honor this administrative update to the customer record of account.

II. MEDICAL EMERGENCY AND PUBLIC SAFETY (20 CSR 4240-13.050)

Documented Health Crisis: Under 20 CSR 4240-13.050(10), a utility must postpone disconnection if it will aggravate an existing medical emergency. Complainant's asthma requires nebulizer treatments (Electric/Ameren), stable climate control (Gas/Spire), and sanitation (Water/MO American).

Federal Regulatory Compliance: Denial of these services violates 45 CFR § 96.84 regarding energy-related health crises and the Americans with Disabilities Act (ADA) (28 CFR Part 35), which requires reasonable accommodations for those with physical impairments that substantially limit major life activities, such as breathing.

III. DISPUTE OF DEBT AND DISCHARGE BY NON-VALIDATION

Debt Validation (15 U.S.C. § 1692g): Complainant formally disputed the alleged debt. Respondents failed to provide a certified Life of Account Ledger or verify the debt as required by law.

Discharge of Obligation (UCC § 3-603): Complainant tendered a Bill of Exchange as a commercial set-off. Because Respondents failed to prove the underlying "debt," failed to return the Bill of Exchange, and failed to provide a ledger, the debt is operationally discharged under UCC § 3-603(b), which states that if a tender of payment is refused, the obligation is discharged to the extent of the tender.

Legal Tender (U.S. Constitution Art. I, § 10): Complainant asserts that Respondents are demanding "payment" in a manner inconsistent with the constitutional standard for legal tender, while simultaneously acting as "debt collectors" rather than service providers by using coercive termination tactics to force payment of unverified sums.

IV. HUMAN RIGHTS AND THE "PUBLIC" NATURE OF UTILITIES

Right to Life: Complainant asserts the right to water and energy as a fundamental human right essential for life (UN Resolution 64/292). As Public Utilities, Respondents have a federal and state duty to provide essential services to the public, particularly when life-sustaining medical equipment is at stake.

WHEREFORE, Complainant moves the Commission to deny Respondents' motions, acknowledge the discharged status of the disputed debt, order the update of account records to the Germany Family Trust, and issue an immediate Permanent Stay of Disconnection to protect Complainant's life and health.

Respectfully submitted,

/s/ Latrell S. Germany

Latrell S. Germany

Mailing Address: [REDACTED],

[REDACTED]

CERTIFICATE OF SERVICE

I certify that a copy of this document was sent via electronic mail on this 27th day of April, 2026, to:

Spire Missouri: [REDACTED]

Ameren Missouri: [REDACTED]

MO American Water: [REDACTED]

/s/ Latrell S. Germany

Latrell Germany

[REDACTED]

Mailing Address:

[REDACTED]