

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

LATRELL S. GERMANY,)
)
Complainant,)
)
v.) Case No. GC-2026-0278
) (Consolidated with EC-2026-0279
SPIRE MISSOURI INC.,) and WC-2026-0287)
UNION ELECTRIC COMPANY (AMEREN),)
MISSOURI AMERICAN WATER CO.,)
)
Respondents.)

COMPLAINANT'S DEFINITIVE STATEMENT OF FACTS IN RESPONSE TO ORDER

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 of April 30, 2026. Complainant asserts that the following facts are specific to each Respondent and fall squarely within the Commission's jurisdiction.

I. JURISDICTIONAL STATEMENT AND COMMON PROCEDURAL HISTORY

Commission Jurisdiction: Under RSMo § 393.130 and RSMo § 393.140, the Commission has the authority to regulate the safety, adequacy, and reasonableness of utility services.

History of Dispute: Complainant has been actively reaching out to each Respondent to dispute the alleged debts and request a certified "Life of Account Ledger" since August of 2024. To date, no Respondent has provided the requested validation of the math used to calculate these totals.

Medical Emergency Status: All Respondents received a Doctor-Authorized Medical Emergency Assistance Form in August of 2025. These Respondents have had actual knowledge of Complainant's Chronic Asthma since the submission of these documents.

Household Safety: A one-month-old infant resides in the home. The denial of water, gas, or electric services creates an immediate life-safety hazard.

Tender of Payment: Lawful tender via a Bill of Exchange was provided to all Respondents. Under UCC § 3-603(b) and RSMo § 400.3-603(b), the refusal of this tender discharges the obligation.

II. SPECIFIC STATEMENT AGAINST SPIRE MISSOURI (Case No. GC-2026-0278)

1. Missouri Safety Standards: Spire is in violation of RSMo § 393.140 and 20 CSR 4240-13.050(10). Stable indoor temperature regulation is a medical necessity; extreme fluctuations trigger life-threatening asthma attacks and impede the efficacy of inhaler-based rescue medications. Gas service is also required for cooking; without it, the Complainant cannot provide the essential nutrition required to manage her health.

2. Account Status: The total disputed amount is [REDACTED] that has now been reduced to 0.00. While Spire has recently corrected the bill, Complainant maintains that due to the permanent medical condition and the refusal of the previously tendered Bill of Exchange, no further billing or denial of service is lawful under RSMo § 393.130.

3. Federal Health-Energy Compliance: Under 45 CFR § 96.84, utilities must provide accommodations for health-related energy crises.

4. Refusal of Tender: Spire's retention of the Bill of Exchange without applying credit or returning it constitutes conversion under RSMo § 400.3-420.

III. SPECIFIC STATEMENT AGAINST AMEREN MISSOURI (Case No. EC-2026-0279)

1. Adequacy of Service: Ameren has failed to provide service as mandated by RSMo § 393.130. Electricity is a mechanical necessity for the climate control required to manage a Complainant's asthma, prevent rescue-inhaler dependence, and ensure the safety of the infant.

2. Account Status: The total disputed amount is [REDACTED] which has been reduced since I've filed this case. Ameren has been aware of the medical necessity since August 2025 but continues to demand payment for a debt that has not been validated by a ledger.

3. Federal Billing Protections: Under 15 U.S.C. § 1601 (TILA) and RSMo § 407.020, Ameren's refusal to provide a "Life of Account Ledger" while demanding payment is an unfair practice.

4. Refusal of Tender: Ameren's refusal of a lawful tender while retaining the instrument discharges the debt under UCC § 3-603 and RSMo § 400.3-603(b).

IV. SPECIFIC STATEMENT AGAINST MO AMERICAN WATER (Case No. WC-2026-0287)

1. Missouri Statutory Duty: Water is essential for sanitation and the prevention of life-threatening dehydration under RSMo § 393.130. Depriving a home with an infant and a medically fragile adult of water is "unjust and unreasonable."

2. Account Status: The total disputed amount is \$ [REDACTED] Complainant has disputed this total since August 2024 and provided medical documentation in August 2025.

3. Human Rights & State Policy: UN Resolution 64/292 establishes water as a human right, which Missouri law codifies by mandating that essential services never be withheld in a manner that creates a public health crisis.

4. Administrative Integrity: Complainant requested the account be updated to the Germany Family Trust. The failure to perform this update is an administrative error that violates the right to accurate record-keeping under RSMo § 407.020.

5. Property Rights: Respondent's refusal of tender and failure to return the original instrument violates RSMo § 400.3-603(b) and RSMo § 400.3-420.

V. CONCLUSION

Because these medical conditions are chronic and the Respondents have refused lawful tender of payment, Complainant disputes all past, present, and future billing as it pertains to the right to life and safety.

WHEREFORE, Complainant moves the Commission to recognize the life-safety emergency and issue a Permanent Stay of Disconnection for all accounts.

Respectfully submitted,
/s/ Latrell S. Germany

[REDACTED]

CERTIFICATE OF SERVICE

I certify that a copy of this document was sent via electronic mail on this 6th day of May, 2026, to:

Spire Missouri: antonio.arias@spireenergy.com

Ameren Missouri: AmerenMOService@ameren.com

MO American Water: jennifer.coleman01@amwater.com