

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

LATRELL S. GERMANY,)

Complainant,)

v.) Case No. GC-2026-0278

SPIRE MISSOURI INC.,) (Consolidated with EC-2026-0279

UNION ELECTRIC COMPANY (AMEREN),) and WC-2026-0287)

MISSOURI AMERICAN WATER CO.,)

Respondents.)

COMPLAINANT'S CONSOLIDATED APPLICATION FOR REHEARING AND
DEFINITIVE STATEMENT OF FACTS

COMES NOW Latrell S. Germany, Complainant, appearing as a natural person and consumer of record, for her Application for Rehearing pursuant to RSMo § 386.500. This filing is submitted to address the deficiencies noted in the Commission's prior orders and to respond directly to the arguments raised by Spire Missouri Inc. in its May 14, 2026, filing. Complainant asserts that the Commission's dismissal was unjust and unreasonable as it failed to account for the

Respondents' violations of Missouri's safety mandates and medical emergency regulations.

I. JURISDICTIONAL MANDATE AND GOVERNING CASE LAW

The Commission has a mandatory duty to ensure that utility corporations provide service that is "safe and adequate" and "just and reasonable" under RSMo § 393.130.

State ex rel. DePaul Health Center v. Public Service Commission, 564 S.W.2d 531:

The Missouri courts have held that the Commission must prioritize the protection of public health and interest.

State ex rel. GS Technologies Operating Co. v. PSC, 945 S.W.2d 539: This case affirms that when a consumer alleges that a utility's practices are "unsafe" or "unjust," the Commission is legally required to investigate.

Complaint's allegations fall squarely within this jurisdiction because the Respondents have intentionally created a life-safety hazard by threatening or executing disconnections in a household containing a medically fragile adult and a one-month-old infant.

II. DETAILED STATEMENT OF FACTS AND VIOLATIONS BY RESPONDENT

A. SPIRE MISSOURI INC. (Case No. GC-2026-0278)

Disputed Total: \$ [REDACTED] (0.00 as of May 15th, 2026).

Account Number: [REDACTED] ([REDACTED]).

Administrative History: Complainant served Spire with a Notice of Claim of Interest on June 26, 2024, and a Disputed Affidavit of Notation. Spire received actual notice of [REDACTED] on May 12, 2025, through a doctor-authorized medical form.

Violation 1 (RSMo § 393.130): Spire violated its duty to provide "safe and adequate" service by continuing to assess fees and late penalties after receiving notice of the medical emergency. For a person with asthma, gas-powered climate control is a life-sustaining necessity.

Violation 2 (20 CSR 4240-13.050(10)): This regulation mandates a postponement of disconnection for medical emergencies. By refusing to freeze the account and continuing to demand [REDACTED], Spire is attempting to circumvent the "medical hold" safety rule.

Violation 3 (RSMo § 400.3-420 & § 400.3-603(b)): Spire received a lawful Bill of Exchange/Payment Draft on November 3, 2025. Their refusal to apply credit while retaining the instrument constitutes a conversion of property and a discharge of the debt to the extent of the tender.

B. UNION ELECTRIC COMPANY - AMEREN MISSOURI (Case No.

EC-2026-0279)

Disputed Total: [REDACTED] (as of May 15th, 2026).

Account Number: [REDACTED]).

Violation 1 (Unlawful Disconnection): Ameren disconnected services on March 14, despite actual knowledge of the Chronic Asthma condition and the presence of a newborn. This is a gross violation of the safety oversight mandated by RSMo § 393.140.

Violation 2 (Debt Verification): Under RSMo § 407.020 and 15 U.S.C. § 1692g, Ameren was required to provide a "Life of Account Ledger" following the disputes filed in August 2024 and March 23, 2025. Without this certified accounting, the demand for \$ [REDACTED] is an "unfair practice."

Violation 3 (45 CFR § 96.84): Ameren failed to accommodate a health-related energy crisis. Electricity is a mechanical necessity for the Complainant's breathing treatments. Disconnecting a life-sustaining utility for a disputed amount that was tendered via Bill of Exchange on March 24, 2025, is inherently "unjust."

C. MISSOURI AMERICAN WATER CO. (Case No. WC-2026-0287)

Disputed Total: [REDACTED] (as of May 15th, 2026).

Account Number: [REDACTED]

Violation 1 (RSMo § 393.130): Missouri American Water was served a medical emergency notice on September 12, 2025. Depriving a medically fragile household of water for hydration and hygiene constitutes an "unreasonable" practice and a violation of the safe and adequate service mandate.

Violation 2 (Administrative Failure): The Respondent failed to update the account to the "Germany Family Trust" as requested in 2024, leading to inaccurate record-keeping and billing violations under RSMo § 407.020.

Violation 3 (Refusal of Tender): A Bill of Exchange and Beneficiary Interest Notice were submitted on March 24. Under RSMo § 400.3-603(b), the refusal of this tender discharges the obligation. The current demand for \$ [REDACTED] is therefore invalid.

III. CONCLUSION

The Respondents were all aware of the Chronic Asthma condition through doctor-signed certifications. They have all failed to provide the requested account ledgers to verify their math, and they have all refused or improperly handled lawful tenders of payment. Their collective actions have created an immediate threat to the health and safety of a medically fragile adult and an infant.

WHEREFORE, Complainant moves the Commission to vacate the Order of Dismissal, grant this Application for Rehearing, and order a Permanent Stay of Disconnection while these unsafe and unjust practices are investigated.

Respectfully submitted,

/s/ Latrell S. Germany

[REDACTED]
[REDACTED]

CERTIFICATE OF SERVICE

I certify that a copy of this document was sent via electronic mail on this 15th day of May, 2026, to:

Spire Missouri: [REDACTED]

Ameren Missouri: [REDACTED]

Missouri American Water: [REDACTED]

Commission Secretary Nancy Dippell: [REDACTED]