

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

LATRELL S. GERMANY,)

Complainant,)

)

v.) File 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 CONSOLIDATED MOTION FOR MANDATORY
DISCLOSURE, ACCOUNTING OF SECURITIZATION OFFSETS, AND
EMERGENCY STAY OF DISCONNECTION

COMES NOW Latrell S. Germany (hereinafter "Complainant"), appearing as a natural person and primary beneficiary of the Latrell Shonta Germany Estate, in

connection with the Germany Family Trust, and for her Consolidated Motion and Supplemental Demand against Respondents and the Missouri Public Service Commission (PSC), states as follows:

I. INCORPORATION OF PRIOR FILINGS

Complainant hereby incorporates by reference the Formal Notice and Demand filed on May 15, 2026. This Motion serves as a supplemental and consolidated request for specific financial disclosures necessary to establish the "just and reasonable" nature of the rates charged by Respondents.

II. SUPPLEMENTAL DEMAND FOR ACCOUNTING OF SECURITIZATION OFFSETS

Disclosure of Securitization Proceeds: Pursuant to RSMo § 393.140, Complainant demands an itemized disclosure of all capital gains, dividends, and investment interests derived from the securitization of the utility service contracts associated with [REDACTED]

Application of Financial Offsets: Complainant asserts that any financial gains derived from the trading or securitization of these accounts (linked to CUSIP/ISIN identifiers) constitute a credit that must be applied to the "Life of Account Ledger." Under RSMo § 393.130, it is "unjust and unreasonable" for a utility to retain

secondary financial gains while simultaneously demanding payment for the full face value of a disputed bill.

Instruction for Immediate Deposit: To the extent that Respondents or the Commission's registry are holding unreported credits, capital gains, or financial offsets belonging to the LatrellShontaGermanyEstate in connection with the Germany Family Trust, Complainant demands the immediate deposit of these funds into the primary account on file to satisfy any alleged outstanding balance.

Verification of Beneficiary Interest: Complainant demands proof of any third-party disbursements made from the assets of these utility accounts. Failure to disclose these offsets constitutes a violation of the fiduciary duty to provide accurate and transparent billing under RSMo § 407.020.

III. CONSOLIDATED DEMANDS FOR ACCOUNTING AND SAFETY

Certified "Life of Account" Ledgers: Complainant demands a certified, full forensic accounting of all billing cycles from account inception to the present, including an itemized breakdown of the application of payment instruments (Bills of Exchange) previously tendered.

Medical Emergency Compliance: Respondents must disclose why disconnections were threatened or executed despite actual notice of [REDACTED] and the residence of an infant, in direct violation of 20 CSR 4240-13.050(10).

Emergency Stay: Under RSMo § 393.130, Complainant demands an immediate administrative stay of all disconnection activity and the restoration of any services terminated, as the cessation of utilities to a medically fragile household represents an immediate threat to life.

IV. LEGAL BASIS

The Commission has the power under RSMo § 393.140 to examine all accounts and records of utility corporations. Furthermore, under RSMo § 386.390, Complainant is entitled to a hearing on any act or omission by a public utility in violation of Missouri law.

WHEREFORE, Complainant moves the Commission for an Order compelling the disclosure of the aforementioned records and a Permanent Stay of Disconnection while these unsafe and unjust billing practices are investigated.

Respectfully submitted,

Dated: May 15, 2026

/s/ Latrell S. Germany

[REDACTED]

[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served via electronic mail on this 15th day of May, 2026, to the following:

Spire Missouri Inc.: [REDACTED]

Ameren Missouri: [REDACTED]

Missouri American Water: [REDACTED]

Commission Secretary: [REDACTED]

/s/ Latrell S. Germany