

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Aquilla Canada and Dranel Clark,)
Complainants,) v.) File No. _____) Ameren Missouri) d/b/a Ameren Missouri) Respondent.)

FORMAL COMPLAINT

1. Complainants reside at:

Aquilla Canada Dranel Clark

Telephone (Aquilla Canada):

Telephone (Dranel Clark):

Email (Aquilla Canada):

Email (Dranel Clark):

1. The utility service complained of was received at:

Complainants' address listed in Paragraph 1.

Service Address:

Account Number: [ACCOUNT NUMBER]

1. Respondent's address is:

Ameren Missouri P.O. Box 66149 St. Louis, Missouri 63166-6149

1. Respondent is a public utility under the jurisdiction of the Missouri Public Service Commission.

2. The amount at issue is:

At least \$, together with all disputed charges, fees, billing adjustments, penalties, deposits, collection actions, threatened disconnection costs, and any additional amounts improperly assessed against the account.

1. Complainants request the following relief:

A. Immediate suspension of any threatened service interruption, disconnection, termination, or collection activity until final disposition of this matter.

- B. Preservation of electric service throughout the pendency of this formal complaint and all related proceedings.
- C. Production of a complete account audit from account inception in September 2021 through present.
- D. Production of all billing calculations, usage calculations, adjustments, software-generated calculations, credits, debits, pledges, payment records, collection records, and internal account notes.
- E. Identification of all software vendors, billing vendors, contractors, consultants, and third-party entities involved in billing calculations affecting Complainants' account.
- F. Production of all documents relied upon by Respondent when representing to the Commission that the prior complaint should be closed.
- G. Production of all documents supporting the alleged balance increases following payment of the account.
- H. Investigation into whether Respondent improperly represented account status to the Commission.
- I. Removal of all unsupported charges.
- J. Correction of all billing errors.
- K. Such other and further relief as the Commission deems just and proper.
 - 1. The relief requested is appropriate because Respondent has violated statutes, tariffs, Commission regulations, consumer protection obligations, and duties owed to Missouri utility customers, including but not limited to the following:
 - A. Respondent has repeatedly failed to provide a complete audit of the account despite repeated requests.
 - B. Respondent has failed to provide verifiable documentation supporting significant billing fluctuations.
 - C. Respondent has failed to provide transparent explanations for charges assessed to the account.
 - D. Complainants submitted evidence indicating that actual electrical usage does not support the billing amounts assessed.
 - E. Audio evidence obtained from a Respondent technician indicates that observed usage levels were consistent with substantially lower consumption than reflected in disputed billing charges.
 - F. The technician's findings indicated a billing issue rather than a meter issue.
 - G. Respondent subsequently relied upon a limited statement that the meter was functioning while failing to disclose findings relevant to billing discrepancies.

H. Respondent represented that account balances had been resolved and that the prior complaint should be closed.

I. Complainants were not provided adequate notice, verification, confirmation, or opportunity to challenge the information allegedly relied upon to justify closure of the prior complaint.

J. After payment was received on or about May 19, 2026, and after representations that the account had been brought current, Respondent subsequently asserted a substantially increased balance and renewed threats of disconnection.

K. Respondent's representatives have been unable to provide complete documentation supporting the disputed balances.

L. Respondent's representatives have been unable to verify alleged pledge activity or provide supporting records when requested.

M. Complainants are disabled Missouri residents who rely upon electric service for health, safety, daily living, communication, and business operations.

N. Continued threats of disconnection create substantial hardship and risk to Complainants.

O. Complainants believe Respondent has failed to adequately disclose, explain, or administer available assistance programs and customer protections.

P. Complainants further assert that the recurring nature of these disputes demonstrates the need for a complete Commission investigation.

Q. This complaint is not a duplicate filing.

R. This complaint is based upon newly discovered evidence, new billing activity, new communications, new threatened disconnection actions, and additional events occurring after prior proceedings.

S. None of the principal evidence supporting this complaint was previously presented in identical form.

T. Complainants seek independent review of all evidence rather than reliance upon Respondent's unsupported representations.

1. The Complainants have taken the following steps to present this matter to Respondent:

A. Contacted Respondent numerous times regarding disputed charges.

B. Requested billing explanations.

C. Requested account audits.

D. Requested discovery and supporting documentation.

E. Communicated with customer service personnel, supervisors, technicians, and other representatives.

F. Submitted evidence through Commission proceedings.

G. Participated in informal and formal complaint processes.

H. Made payments and attempted payment arrangements in good faith.

I. Requested verification of balances and adjustments.

J. Requested information concerning alleged pledges and account credits.

K. Attempted repeatedly to resolve the dispute without litigation.

L. Despite these efforts, Respondent has failed to provide sufficient documentation and transparency to resolve the matter, making Commission intervention necessary.

WHEREFORE, Complainants respectfully request that the Missouri Public Service Commission accept this Formal Complaint, preserve utility service during the pendency of this proceeding, compel full production of account records and audits, investigate Respondent's conduct, and grant all other relief deemed just, equitable, and proper.

Date: ____

Telephone (Aquilla Canada): [REDACTED]

Telephone (Dranel Clark): [REDACTED]

Aquilla Canada, Complainant

Dranel Clark, Complainant

Aquilla Canada [REDACTED]

Dranel Clark [REDACTED]

Email: [REDACTED]

Email: [REDACTED]