

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of:

Aquilla Canada and Dranel Clark, Complainants,

v.

Union Electric Company d/b/a Ameren Missouri, Respondent.

Case No. EC-2026-0341

COMPLAINANTS' RESPONSE TO ORDER DIRECTING A STATEMENT OF FACTS FORMING THE BASIS OF THEIR COMPLAINT

COME NOW Complainants Aquilla Canada and Dranel Clark and, in response to the Commission's June 2, 2026 Order, respectfully provide the following statement of facts forming the basis of this complaint.

1. This complaint is not a duplicate of any prior complaint. It is based upon newly discovered evidence, new billing activity, new communications, new threatened disconnection actions, and additional events that occurred after the prior proceedings.
2. On December 17, 2025, an Ameren Missouri technician inspected Complainants' electrical service and meter in response to ongoing concerns regarding billing accuracy.
3. During that inspection, which was recorded by Complainants, the technician stated at approximately 9 minutes and 45 seconds into the recording that the residence was using less than 40 kilowatt-hours of electricity per day. The technician further stated that such usage was comparable to or less than that of a one-bedroom apartment.
4. During the same recorded inspection, the technician advised that the issue did not appear to be a meter problem and indicated that the issue appeared to be a billing issue rather than a metering issue.
5. Complainants are submitting the recording and related documentation as supporting evidence.
6. During or about February 2026, Complainants were informed that their Ameren Missouri account reflected a zero balance following the application of an assistance payment or pledge.
7. Complainants relied upon the information provided and understood that the account had been brought current.
8. During communications with Ameren Missouri Community Relations Manager Aubrey Kirchmeyer regarding the Cold Weather Rule, Complainants were advised that the anticipated monthly payment would be approximately \$ [REDACTED] and that the next payment obligation would be approximately \$ [REDACTED].

9. Based upon those representations, Complainants reasonably believed that the account had been stabilized and that any remaining balance issues had been addressed.
10. Thereafter, Complainants received a bill in approximately April 2026 reflecting an amount due of approximately \$ [REDACTED].
11. Complainants disputed this amount because there had been no significant increase in electrical usage and because the amount appeared inconsistent with the technician's findings regarding actual usage.
12. On or about April 27, 2026, while preparing discovery materials and reviewing the status of the matter, Complainants learned for the first time that the prior complaint proceeding had been closed and that the appeal period had expired.
13. Prior to learning of the closure, Complainants had every intention of continuing to participate in the proceedings and had consistently responded to Commission requests throughout prior proceedings.
14. Complainants did not knowingly abandon the prior case and were unaware that dismissal had occurred until after the appeal period had lapsed.
15. Following discovery of the closure of the prior proceeding, Complainants received notice that the account balance had increased to an amount exceeding \$ [REDACTED].
16. Complainants dispute this amount because there was no corresponding increase in electrical usage that would explain such a substantial increase.
17. On May 19, 2026, Complainants requested a payment extension because Ameren Missouri was claiming a balance of approximately \$ [REDACTED].
18. The extension notice required a payment of approximately \$ [REDACTED].
19. Although Complainants disputed the balance, they were willing to comply with the extension requirement while attempting to resolve the billing dispute.
20. When Complainants contacted Ameren Missouri seeking clarification regarding the account balance, company representatives were unable to identify the source of the assistance payment, explain the balance fluctuations, or provide a satisfactory explanation regarding how the account had progressed from a reported zero balance to balances of approximately \$ [REDACTED], more than \$ [REDACTED], and ultimately approximately \$ [REDACTED].
21. Complainants possess email communications, billing statements, account notices, extension notices, and other records supporting these facts.
22. On or about May 28, 2026, Complainants received additional account notices concerning the balance allegedly due.

23. On June 1, 2026, and again on June 3, 2026, Complainants received communications threatening disconnection of electric service.
24. At or near that time, Ameren Missouri continued to claim a balance of approximately \$ [REDACTED].
25. Complainants contend that these disconnection threats occurred while a legitimate billing dispute remained unresolved and while Complainants were actively pursuing relief through the Commission.
26. Complainants further attempted to obtain information regarding assistance programs advertised or referenced by Ameren Missouri.
27. Complainants were informed that no assistance programs were available other than LIHEAP and that funding for other programs was unavailable.
28. Complainants possess email communications documenting these inquiries and responses.
29. The property is presently being prepared for occupancy by a tenant who is expected to place utility service in the tenant's own name before taking possession of the premises.
30. However, the disputed balance of approximately \$ [REDACTED] remains unresolved and continues to be contested by Complainants.
31. Complainants do not object to paying legitimate charges supported by accurate billing records. However, Complainants continue to dispute the accuracy of the amounts claimed due because those amounts appear inconsistent with the technician's findings, the reported account status, and Complainants' actual usage.
32. Complainant Aquilla Canada is legally blind and requests reasonable accommodation in all communications and proceedings.
33. Complainants are submitting supporting exhibits, including billing statements, account notices, extension notices, email communications, and the December 17, 2025 recording referenced herein.
34. These facts occurred after the prior proceedings and constitute the factual basis for this complaint.

WHEREFORE, Complainants respectfully request that the Commission accept this Statement of Facts, determine that this complaint presents new facts and events occurring after prior proceedings, require Ameren Missouri to provide a complete accounting and explanation of the disputed charges, review the supporting evidence submitted by Complainants, suspend any disconnection activity relating to the disputed amounts while this complaint remains pending, and grant such other and further relief as the Commission deems just and proper.

Respectfully submitted,

Aquilla Canada

Dranel Clark