

FILED
June 15, 2026
Missouri Public
Service Commission

From: Aquilla Canada <[REDACTED]>
Sent: Friday, June 12, 2026 7:06 PM
To: Missouri Public Service Commission <pscinfo@psc.mo.gov>
Subject: Fwd: Supplemental Discovery Submission with Statutory Violations – Aquila Canada & Dranel Clark v. Ameren Missouri

To the Missouri Public Service Commission:

Please accept this correspondence as a Supplemental Discovery Submission of the Complainants, Aquila Canada and Dranel Clark, in the matter currently pending before the Commission, with a scheduled hearing date of June 12, 2026.

This submission supplements prior Discovery and includes statutory violations, regulatory breaches, and newly asserted claims based on evidence.

STATUTORY AND REGULATORY VIOLATIONS

The Complainants assert that Ameren Missouri's conduct constitutes violations of, but not limited to:

1. Missouri Revised Statutes § 393.130

- Prohibits unjust, unreasonable, or discriminatory utility charges and practices
- Billing fluctuations from \$0 to \$148 to \$529 within one billing cycle constitute prima facie unreasonable charges

2. Missouri Revised Statutes § 393.140

- Requires utilities to furnish safe, adequate, and proper service
- Failure to provide accurate billing and access to assistance programs violates adequacy standards

3. Missouri Code of State Regulations 20 CSR 4240-13 (Billing Practices)

- Requires accurate, transparent billing
- Prohibits misleading or unverifiable billing statements

4. 20 CSR 4240-13.055 (Cold Weather Rule)

- Protects vulnerable customers from disconnection and improper billing escalation
- Sudden escalation immediately following the rule period is indicative of circumvention

5. Ameren Missouri Tariff Violations

- Failure to properly calculate usage
- Failure to provide verifiable billing methodology
- Failure to administer assistance programs consistently

CASE LAW SUPPORT

The Complainants rely on general legal principles established in utility regulation cases, including:

- That utility charges must be just, reasonable, and non-discriminatory
- That unexplained billing irregularities constitute regulatory violations
- That failure to provide transparency in billing supports administrative enforcement and corrective action

ADDITIONAL ASSERTIONS

- Ameren Missouri has failed to identify the alleged “software provider” responsible for billing errors
- Billing statements lack internal consistency and fail to meet evidentiary reliability standards
- Assistance programs publicly advertised were effectively denied in practice
- The Complainants, as disabled individuals, were disproportionately impacted

REQUEST FOR ENFORCEMENT

Complainants request:

1. Formal finding of regulatory violations
2. Immediate audit and correction of account
3. Enforcement action by the Commission
4. Preservation of all evidence by Respondent

Respectfully submitted,

Aquila Canada

Dranel Clark

Date: April 29, 2026