BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JOHN DADY AND DEBORA HOYLE, Complainants,

v.

AMEREN MISSOURI, Respondent.

Case No. 2026-0349

FILED
JUN 24 2026
Missouri Public
Service Commission

MOTION TO RECLASSIFY COMPLAINT TO FULL FORMAL COMPLAINT PROCEDURE

COMES NOW Complainants, John Dady and Debora Hoyle, and for their Motion to Reclassify state as follows:

1. This matter is currently proceeding under the Commission's "Small Formal Complaint" procedure pursuant to 20 CSR 4240-2.070(15).
2. The Small Formal Complaint procedure is limited to disputes involving less than $3,000.00.
3. The Complainants hereby clarify that the amount in dispute regarding the alleged systemic overbilling by the Respondent involves multi-year damages that significantly exceed the $3,000.00 threshold.
4. Because the claim exceeds the threshold for the small formal procedure, the Complainants respectfully request that the Commission reclassify this matter as a Full Formal Complaint.
5. Complainants further object to mediation and request that this matter proceed to a full evidentiary hearing where discovery and formal testimony can be utilized to substantiate the total damages.
6. Respondent, Ameren Missouri, is in violation of 20 CSR 4240-13.020(2), which mandates that each billing statement rendered by a utility shall be computed on the actual usage during the billing period. By consistently billing Complainants for kilowatt-hours not consumed, Respondent has failed to adhere to the billing and payment standards established by the Commission.

WHEREFORE, Complainants request that the Commission grant this Motion, reclassify Case No. 2026-0349 as a Full Formal Complaint, and provide notice to the parties of the revised procedural schedule.

Respectfully submitted,

/s/ John Dady John Dady

/s/ Debora Hoyle Debora Hoyle

[redacted]

Public

[redacted]

Cell phone: [redacted]

Email: [redacted]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion was served upon the following party via U.S. Certified Mail, Return Receipt Requested, on this 19th day of _____, 2026:

Wendy K. Tatro

Director and Assistant General Counsel

Union Electric Company (d/b/a Ameren Missouri)

1901 Chouteau Avenue

St. Louis, MO 63103-6149

/s/ John Dady John Dady

/s/ Debora Hoyle Debora Hoyle

Public

[redacted]

CERTIFIED MAIL

SAINT LOUIS MO 630
20 JUN 2026 PM

7022 0410 0002 6338 7676

Retail

UNITED STATES POSTAL SERVICE

RDC 99

65102

U.S. POSTAGE PA
FCM LETTER
MOSCOW MILLS, M
JUN 20, 2026

$10.48

S2324P500587-99

RECEIVED
JUN 22 2026
MO PUBLIC SERVICE COMMISSION
MAIL ROOM

Public Service Commission
P.O. Box 360
Jefferson City, MO. 65102

65102-036060