SUBJECT: NOTICE OF IMPASSE, MOTION TO COMPEL DISCOVERY, AND FORMAL INTERROGATORIES — Case No. EC-2026-0349

FILED
October 05, 2026
Missouri Public
Service Commission

TO:
*[redacted]
*[redacted]

* Carla Fields Johnson (Legal Counsel for Ameren)

FROM:

* John Dady and Debora Hoyle (Claimants)

*[redacted]

NOTICE OF IMPASSE AND INTENT TO MOVE FOR AN ORDER TO COMPEL DISCOVERY

TO:[redacted]

*[redacted]

* Carla Fields Johnson, Legal Counsel for Ameren

FROM:

* John Dady and Debora Hoyle

* Case No.: EC-2026-0349

RE: Formal Notice of Mediation Impasse and Demand for Judicial Intervention

* Termination of Mediation

Mediation is hereby declared concluded and at an impasse. Ameren's request for additional mediation meetings is rejected. Further negotiation is unproductive, given that Ameren has failed to engage in transparent, good-faith information sharing.

* Record of Acknowledgment, Silence, and Bad-Faith Investigation

* The Initial Demand & Acknowledgment: On September 22, 2026—the exact day a direct demand was issued for foundational billing information under Case No. EC-2026-0349—opposing counsel Carla Fields Johnson responded by email, stating: "I am in receipt of your email and we will respond accordingly."

* Complete Subsequent Silence: Despite that formal acknowledgment, Ameren has produced zero records, electing instead to maintain total silence and withhold essential data.

* Disproven Accusations: Ameren has engaged in continuous bad-faith dealing by repeatedly accusing the home, its equipment, or occupant usage of causing abnormal power consumption. These claims have been entirely disproven, as the subject property passed its PAYS inspection with flying colors, confirming that no out-of-the-ordinary equipment or structural envelope deficiencies exist.

* Refusal of Infrastructure Diagnostics: Despite the proven physical integrity of the home, Ameren has dismissed the possibility of feed-side or underground line anomalies by arbitrarily claiming such issues are "impossible," while simultaneously refusing to perform basic physical diagnostics, such as a Megger insulation test on the underground service lines running from the transformer to the house.

* Escalation to Court and Motion to Compel

Because Ameren has refused to voluntarily turn over the requested materials and perform necessary physical diagnostics after acknowledging receipt on September 22nd, this matter must now proceed to court. A formal motion will be filed before the judge to compel full production and physical testing.

Through the court's discovery and inspection process, an order will be sought requiring Ameren to produce every component of the requested data and conduct required physical tests, including:

* Complete Historical Billing Records: All billing data, invoices, and meter reads associated with the address since the inception of the account.

* Multipliers and Formulas: All mathematical formulas, rate schedules, and multiplier values applied to compute charges.

* Back-End Data and Software Algorithms: All raw interval data, server-side processing metrics, algorithms, and software logic utilized to generate the billing outputs.

* Physical Infrastructure Diagnostics: Court-mandated Megohmmeter (Megger) insulation testing and comprehensive physical line diagnostics on the underground service lines running from the transformer to the property.

The court will now decide what Ameren has chosen to conceal.

MOTION TO COMPEL DISCOVERY AND PRODUCTION OF RECORDS

IN THE MATTER OF: Dispute Resolution / Adjudication Proceedings

CASE NO.: EC-2026-0349

RESPONDENT: Ameren (Union Electric Company)

CLAIMANTS: John Dady and Debora Hoyle

* INTRODUCTION AND STATEMENT OF RELIEF SOUGHT

COMES NOW the Claimants, John Dady and Debora Hoyle, pursuant to Missouri Supreme Court Rule 58.01 and Case No. EC-2026-0349 and move this court/tribunal for an Order Compelling the Respondent, Ameren, to produce full, unredacted, and complete records, electronic data, underlying metrics, and mandatory physical infrastructure testing regarding the subject service address. Respondent's counsel acknowledged receipt on September 22, 2026, stating she would "respond accordingly," yet Respondent has failed and refused to voluntarily provide the foundational billing metrics, algorithms, historical data, or physical line diagnostics, leaving judicial intervention as the sole remedy.

* BACKGROUND AND FAILURE TO COOPERATE

* Termination of Informal Resolution: Informal mediation tracks and further negotiation requests have been formally terminated and declared at an impasse due to Respondent's persistent lack of transparency and failure to engage in good-faith disclosure.

* Refusal of Voluntary Demand: On September 22, 2026, a direct and specific demand was transmitted under Case No. EC-2026-0349 to Respondent's legal counsel, Carla Fields Johnson, and copied to Mediator Charles Hatcher, requesting voluntary production of core billing, backend data, and physical line testing.

* Broken Representation: Counsel replied the same day stating, "I am in receipt of your email and we will respond accordingly." Since that communication, Respondent has elected to maintain total silence, failing to produce any documents, test results, or substantive response within a reasonable administrative window.

* SCOPE OF REQUESTED PRODUCTION AND PHYSICAL TESTING PURSUANT TO RULE 58.01

Under Missouri Rule of Civil Procedure 58.01, a party is entitled to inspect, copy, or test relevant documents, electronic records, data compilations, and physical installations. Respondent possesses exclusive control over the electronic systems, meters, servers, rate application engines, and electrical distribution infrastructure supplying the subject property. To properly prepare and present this case, the Claimants are legally entitled to full discovery and physical verification. Therefore, Claimants move the court to compel the immediate production and execution of the following items:

* A. Complete Historical Billing Data: Every billing statement, invoice, meter read, ledger entry, and usage log associated with the account and address since the inception of the account under the current customers' tenancy.

* B. Multipliers and Rate Formulas: All mathematical multipliers, scaling factors, loss adjustment factors, rate schedules, and algorithmic formulas applied to compute, scale, or adjust raw meter reads into billed units.

* C. Back-End Data and Software Algorithms: All raw interval data, server-side processing metrics, software program logic, and automated algorithms utilized by Ameren or its agents to process, filter, or generate the final billing outputs for the property.

* D. Mandatory Physical Line Diagnostics: An explicit court order requiring Ameren to perform a formal Megohmmeter (Megger) insulation test and comprehensive diagnostic evaluation of the underground feeder lines running from the transformer to the service panel to conclusively rule out or identify feed-side leakage, ground faults, or infrastructure degradation.

* PRAYER FOR RELIEF

WHEREFORE, the Claimants respectfully request that this tribunal enter an Order:

* Compelling Ameren and its legal counsel, Carla Fields Johnson, to fully produce all items and execute all physical tests listed in Section 3 pursuant to Rule 58.01 within a strict, court-ordered deadline not to exceed ten (10) days;

* Establishing that failure to comply will result in evidentiary sanctions or further judicial remedies; and

* Granting such other and further relief as the tribunal deems just and proper.

FORMAL INTERROGATORIES TO RESPONDENT AMEREN PURSUANT TO RULE 58.01

IN THE MATTER OF: Dispute Resolution / Adjudication Proceedings

CASE NO.: EC-2026-0349

RESPONDENT: Ameren (Union Electric Company)

CLAIMANTS: John Dady and Debora Hoyle

Pursuant to Missouri Supreme Court Rule 58.01, the Claimants propound the following written interrogatories to Respondent Ameren, to be answered fully, separately, and under oath within the time limits prescribed by law:

* Meter Calibration and Hardware Certification: Provide all factory calibration records, accuracy testing logs, and certification documents for the specific electric meter installed at the subject service address.

* Technician Credentials and Site Visit Protocol: Identify by name and job title the technicians who conducted the physical site visit to the property, state what diagnostic tools were utilized during the visit, explain why internal panels or equipment were not physically tested, and state the specific justification for omitting testing of the underground service lines.

* Billing Calculations and Multiplier Formulas: State under oath the exact mathematical formula, algorithm, and multiplier values used to convert raw pulse counts or interval data from the meter

into the kilowatt-hour (kWh) units billed on monthly statements, including whether any scaling or loss adjustment factors were applied.

* Back-End Software and Interval Data Processing: Detail how raw interval data is transmitted from the meter to Ameren's billing servers, identify what automated filtering or estimation software is utilized during signal loss or high-usage flags, and state whether automated estimation algorithms filled in data gaps for the subject account.

* System Error Logs and Warning Codes: Provide all system error logs, tampering flags, or diagnostic warning codes generated by the meter or Ameren's automated meter reading (AMR/AMI) network during the disputed billing periods.

* Distribution Infrastructure and Transformer Integrity: Provide maintenance logs, age, rating, and load distribution records for the electrical transformer supplying the property, along with historical outage or ground-fault reports for the underground feeder lines running from the transformer to the service drop.

* Corporate Policy on Megger Testing: State Ameren's corporate policy and technical justification for refusing to perform Megohmmeter (Megger) insulation testing on underground service drops when customers formally dispute consumption anomalies.

Respectfully submitted,

John Dady and Debora Hoyle

Claimants

[redacted]

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