BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

John Dady and Debora Hoyle	)	
	)	
Complainants,	)	
	)	**File No.: EC-2026-0349**
vs.	)	
	)	
Union Electric Company, d/b/a Ameren Missouri,	)	
	)	
Respondent.	)	

SATISFACTION OF COMPLAINT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and respectfully states to the Missouri Public Service Commission ("Commission") as follows:

1. Complainants dispute the amount of electricity billed at their residence on file, and allege that the residence could not have consumed the recorded quantities. Their formal complaint requests an investigation, including on-site verification of whether equipment exists that could account for the billed usage, and an accurate measurement of kilowatt-hours and explanation of the amounts billed. The complaint identifies the disputed dollar amount as “to be determined.”

2. Ameren Missouri has satisfied Complainant’s requests for investigation and verification raised in the complaint by conducting tests, inspections, meter replacement, records review, and an evaluation through the Whole Home Pay As You Save (PAYS) program. Ameren Missouri has undertaken the investigations and supplied usage and meter information responsive to those concerns, and thereby satisfied the requested relief in the Formal Complaint.

3. Meter accuracy and replacement. On March 2, 2026, Ameren Missouri tested meter number 71100846 at the premises. It passed at 99.98% accuracy at full load. Although the test revealed no meter defect, Ameren Missouri replaced that meter at the customer's request with meter number 96044150. The replacement meter had also been tested before installation and registered 99.96% at full load. Thus, the records document two meter accuracy tests and a meter exchange notwithstanding the passing result on the original meter. (See Exhibit A).

4. Transformer and service investigation. Ameren Missouri personnel inspected the transformer and related service equipment in March 2026. On March 3, personnel used an amp meter and observed no current entering the residence when its main breaker was off; with the breaker on, approximately six amps were observed. A March 10 inspection found no transformer leaks or other unusual condition. On September 1, 2026, Superintendent Joseph Prenger met with the customer, opened the transformer and meter base for visual inspection, and reviewed interval data demonstrating zero recorded usage during a five-hour period on August 25 when the main breaker was off. These observations do not support the contention that the meter continued registering household consumption while the main breaker was off. (See Exhibit F).

5. Energy assessment. As a general practice, Ameren Missouri does not inspect or evaluate electrical appliances within a customer's residence. Nevertheless, to further investigate Complainants' concerns and ensure customer satisfaction, Ameren Missouri arranged for an independent professional energy consultant to conduct a Whole Home PAYS residential energy assessment on August 24, 2026, with a report issued August 27, 2026. The consultant inspected the home, documented equipment and building-envelope characteristics, reviewed historical billing information, and developed engineering-based consumption estimates for major household electrical loads, including a year-round hot tub, cooling equipment, a

swimming pool pump, and other appliances. The consultant estimated annual consumption of approximately 13,495 kWh, compared with 18,134 kWh recorded by Ameren Missouri's meter during the corresponding 365-day period. No individual electrical load was directly measured during the assessment. Rather, the estimates were based on equipment characteristics, homeowner-reported operating conditions, and other assumptions and do not establish what the residence should have consumed. For example, estimated hot-tub consumption varied substantially depending on assumed insulation characteristics, water temperature, and basement temperature, none of which were directly measured. The consultant could not fully reconcile estimated consumption with metered usage or determine the cause of the difference. Accordingly, the difference between estimated and metered consumption does not, by itself, establish meter inaccuracy, but instead reflects the limitations of estimating individual household loads without direct measurement. The consultant recommended circuit-level monitoring to replace those estimates with measured load data and reconcile household consumption with meter registration. (See Exhibit C).

6. HVAC replacement and historical consumption. Complainants have questioned their electric usage following replacement of the heating and cooling system in spring 2025. The PAYS assessment confirms that the HVAC system was replaced and that other significant electrical loads continued to operate at the premises. The assessment reports annual electric consumption of 25,121 kWh for September 2023 through September 2024; 23,212 kWh for September 2024 through September 2025; and, 18,134 kWh for August 2025 through August 2026. These readings represent an approximate 28% decline between the first and last periods. The recorded decrease is inconsistent with an assertion that the residence experienced no reduction in overall electric usage. (See Exhibit C).

7. Billing and usage information. Ameren Missouri has reviewed the account history and interval-meter and account-activity records. The records reflect the same general year-over-year decline in electric usage noted in the PAYS assessment. The accuracy tests, main-breaker observations, and usage records provide support for Ameren Missouri's position that the billed consumption was recorded by functioning meters. (Exhibit D and Exhibit E).

8. Interval Meter Data and Main Breaker Test. At the suggestion of the contractor who performed the Whole Home PAYS assessment, and following discussions with Ameren Missouri District Superintendent Joseph Prenger, Mr. Dady conducted a test by turning off the residence's main electrical breaker on the evening of August 25, 2026, shortly after 10:00 p.m., and restoring service at approximately 3:00 a.m. on August 26, 2026. Ameren Missouri reviewed the interval usage data recorded by meter number 96044150 during this period. The data reflects a small amount of recorded consumption during the 10:00 p.m. interval, consistent with the breaker having been turned off shortly after that interval began or that the meter may not have been set to the exact time of the Complaints clock. The meter thereafter recorded no electricity consumption for approximately five consecutive hours while the main breaker remained off. This evidence demonstrates that the meter did not continue registering electricity consumption when the residence's main breaker was open and directly contradicts Complainants' suggestion that electricity was being recorded despite the absence of electrical usage within the residence. The results of this test provide further objective support for Ameren Missouri's position that its meter was functioning properly and accurately recording electricity delivered to the residence. (See Exhibit F.)

9. Ameren Missouri has performed the meter testing, meter replacement, transformer and service inspections, billing review, and PAYS assessment described above. Based on the testing, inspections, meter replacement, records review, and PAYS assessment described

above, Ameren Missouri believes it has addressed the requests for investigation and verification raised in the complaint, and therefore, the Formal Complaint should be dismissed. To the extent Complainants maintain that an issue remains for Commission decision, Ameren Missouri requests that they identify the specific remaining allegation, requested relief, and supporting basis so that Ameren Missouri may respond.

10. Complainants' burden of proof. In this formal complaint proceeding, Complainants bear the burden of substantiating their allegations that Ameren Missouri violated an applicable statute, Commission rule, order, or tariff. Their belief that the residence could not have consumed the metered electricity does not, without supporting evidence, establish that either meter registered inaccurately or that a particular bill was erroneous. Ameren Missouri has produced meter-test results, replaced the meter at the customer's request, inspected its equipment, reviewed interval data, and arranged an energy assessment. Those investigations have not identified an inaccurate meter or a billing error. Complainants have not identified contrary meter-test results, a specific erroneous meter reading, a misapplied billing calculation, or other evidence establishing the alleged inaccuracy. Ameren Missouri respectfully submits that a customer's expectation of lower consumption, standing alone, does not shift the burden of substantiating the Complaint to the utility. Ameren Missouri has met its obligation to comply with applicable billing and metering requirements and should not be required to conduct additional unreasonable tests at Complainants request, without evidence that supports the need to do so.

WHEREFORE, Ameren Missouri submits this Satisfaction of Complaint and respectfully requests that the Commission dismiss the Complaint. In the alternative, Ameren Missouri respectfully requests that the Commission direct Complainants to state whether any issues

remain for decision and, if so, to file a more definite statement identifying those issues and the relief sought; and grant such other relief as the Commission deems appropriate.

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing was served on the parties on the certified service list via electronic mail on this 16th day of October, 2026.

/s/ *Carla Fields Johnson*