BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

JOHN DADY and DEBORA HOYLE,
Complainants,

v.

UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI,
Respondent.

Case No. EC-2026-0349

CLAIMANTS' REJECTION OF SATISFACTION OF COMPLAINT, OBJECTION TO MOTION TO DISMISS, AND RENEWED MOTION TO COMPEL DISCOVERY AND MANDATORY PHYSICAL LINE TESTING

COMES NOW Claimants, John Dady and Debora Hoyle, and formally reject Respondent Ameren Missouri's "Satisfaction of Complaint" filed on October 16, 2026. Claimants object in the strongest terms to Respondent's request for dismissal and respectfully move the Commission to enter an Order compelling full compliance with discovery and mandatory physical line diagnostics under Missouri Supreme Court Rule 58.01.

In support thereof, Claimants state as follows:

I. REJECTION OF "SATISFACTION OF COMPLAINT"

Ameren's assertion that it has "satisfied" this complaint is factually and legally false. Merely swapping out a meter, conducting surface-level visual inspections, and commissioning a paper-based audit that relies on wildly flawed assumptions does not resolve an ongoing, unverified billing anomaly.

Ameren has not satisfied the complaint because it has stubbornly refused to conduct the single diagnostic test capable of proving or disproving feed-side energy leakage: a formal Megohmmeter (Megger) insulation test on the underground feeder lines running from the transformer to the service entrance.

II. DISMANTLING AMEREN'S FRAUDULENT DEFENSES AND EXPOSING FABRICATED ALGORITHMIC BILLING

Ameren's pleading relies almost entirely on the speculative estimates of its PAYS consultant, who singled out our indoor hot tub as a primary scapegoat, claiming it was responsible for nearly 30% of our annual electricity consumption (with auxiliary equipment assumptions bundled in). Ameren uses this bogus math to claim that our household usage is "explained."

The Reality of the Hot Tub: Ameren's reliance on this assumption is absurd and factually baseless:

- **8–9% Maximum Real Load vs. 30% Wild Claim:** In reality, the hot tub accounts for no more than 8% to 9% of total household power draw. Ameren's attempt to attribute 30% of our annual usage to this single piece of equipment is mathematically and physically impossible.
- **Barely Noticeable Decrease:** When the hot tub failed and was removed in October 2022, billed usage showed only a barely noticeable decrease (dropping slightly from 935 kWh on the September–October bill to 845 kWh on the October–November bill), falling drastically short of the 30% drop Ameren's theory demands.
- **Data Proves the Hot Tub Was Not the Driver:** During the December 2022 to January 2023 billing cycle—when zero hot tub was present in the home—our billed usage more than doubled to 1,984 kWh. If the hot tub were responsible for 30% of our power usage, removing it permanently should have locked our baseline down. Instead, usage skyrocketed to nearly 2,000 kWh with no hot tub on the property.

The 4,600+ kWh Audit Discrepancy & Billed Load Breakdown Contradictions: Ameren's own filing admits that the PAYS consultant estimated our annual home usage at 13,495 kWh, whereas Ameren's meter billed us for 18,134 kWh. This leaves an unreconciled, unexplained gap of over 4,600 kWh per year that their audit cannot account for.

Furthermore, Ameren's recent billing portal breakdown attributes 65% to 70% of total monthly summer usage strictly to central air cooling. This leaves a minuscule remainder of 5% to 6% (approximately 500 to 600 kWh) to cover every other electrical appliance, lighting, and plug-load in the entire residence. It is mathematically impossible for an indoor hot tub or pool pump to draw 30% of annual power when central cooling accounts for 65% to 70% of monthly summer usage and non-cooling usage is capped at 5% to 6% (500–600 kWh). Ameren's audit model attempts to double-count electricity that was never consumed.

Proof of Fabricated, Algorithmic Billed Loads: Ameren's own breakdown portal proves that its backend billing system generates fictitious, automated load assignments that have no basis in physical reality:

- **Billed Electric Heat on a Gas System:** Ameren's portal repeatedly assigned massive electric heating loads to our account (such as 1,384 kWh of electric heat in winter 2024), despite our home relying entirely on a natural gas furnace and natural gas water heater.
- **Billed Pool Pump Loads in Mid-Winter:** Ameren's portal consistently billed active kilowatt-hour usage to our pool pump during winter months (e.g., 57 kWh in Dec 2022/Jan 2023; 55 kWh in Jan/Feb 2023; 45 kWh in Feb/Mar 2023) when the pool was winterized, drained, and physically powered off.
- **Inverse "Other" / Appliance Algorithm Dumping:** Ameren's portal records "Other" plug-in load dropping to near zero (10, 20, to 25 kWh per month) during peak cooling months when central AC is running. However, as the home transitions out of the cooling season, this same "Other" / appliance category artificially surges by several hundred to over 1,000 kWh per month—without a single new appliance or plug load being added to the home. A household's plug-in load does not vanish in July and multiply in October; this inverse relationship proves that Ameren's backend software uses an automated dumping algorithm to force unverified raw meter readings into the "Other" bucket whenever the AC is offline.

Ameren cannot fabricate imaginary energy hogs out of thin air to cover up an unexplained consumption gap. Their own historical billing logs and phantom appliance allocations prove that the power registered by Ameren originates from an unverified feed-side source or backend software algorithm error.

III. WILFUL FAILURE TO COMPLY WITH DISCOVERY & INTERROGATORIES

On September 22, 2026, Claimants issued formal demands for foundational billing metrics, raw interval data, algorithms, and physical testing. Ameren acknowledged receipt that same day.

Rather than providing direct, sworn answers to Claimants' written Interrogatories or producing the raw back-end data, mathematical multipliers, system error logs, and algorithm logic demanded under Rule 58.01, Ameren filed a self-serving summary narrative.

Ameren's dismissal of physical Megger insulation testing as an "unreasonable test" is unacceptable. Visual inspections of an open transformer box or meter base cannot detect subterranean cable insulation failure, ground-fault leakage, or neutral degradation under load.

IV. PRAYER FOR RELIEF

WHEREFORE, Claimants respectfully request that the Regulatory Law Judge enter an Order:

1. **DENYING** Ameren Missouri's Satisfaction of Complaint and Motion to Dismiss;
2. **OVERRULING** Ameren's refusal to perform physical line testing;
3. **COMPELLING** Ameren to produce, within ten (10) days, all raw interval data, mathematical multipliers, calculation formulas, back-end algorithms, and system error logs requested in Claimants' Motion to Compel and Interrogatories;
4. **ORDERING** Ameren to schedule and execute a comprehensive Megohmmeter (Megger) insulation test on the underground service lines running from the transformer to the meter base, conducted in the presence of Claimants and/or an independent certified representative; and
5. Setting this matter for a formal evidentiary hearing should Ameren fail to account for the unreconciled consumption gap.

Respectfully submitted,

John Dady
Claimant, Pro Se
[redacted]

Debora Hoyle
Claimant