BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

John Dady and Deborah Hoyle, Complainants,
v.
Union Electric Company d/b/a Ameren Missouri, Respondent.

Case No.: EC-2026-0349

FORMAL NOTICE OF LIABILITY AND DEMAND FOR IMMEDIATE COMPLIANCE

TO: Union Electric Company d/b/a Ameren Missouri
Attn: Carla Fields Johnson, Legal Counsel for Respondent
And Respective Corporate Officers and Managing Agents

FROM:
John Dady and Deborah Hoyle, Complainants
[redacted]

DATE: November 7, 2026

I. PURPOSE AND SCOPE OF NOTICE

This document serves as a formal and binding **Notice of Liability and Demand for Immediate Compliance** in connection with Missouri Public Service Commission Case No. EC-2026-0349. Complainants hereby put Respondent Ameren Missouri, its legal counsel, and its corporate officers on direct notice that continued stonewalling, refusal to conduct mandatory physical underground line diagnostics (Megger insulation testing), and withholding of foundational billing software, historical account multipliers, and raw interval data constitute willful non-compliance, bad-faith delay, and deliberate infliction of procedural prejudice.

II. RECORD OF WILLFUL WITHHOLDING AND BAD FAITH

1. **Ignored Discovery Demands:** On September 22, 2026, Complainants issued formal discovery demands for foundational billing metrics, software algorithms, historical multipliers, and raw interval data. Respondent's counsel acknowledged receipt on the

same date, committing to respond accordingly, yet has produced zero unredacted raw records or technical data to date.

2. **Unsupported Audit Defenses:** Respondent relies on a flawed, unmeasured PAYS audit report that admits zero actual electrical loads were measured, fabricates electric heating loads on a gas-heated home, assigns active energy to a winterized pool pump, and invents "cave-like" basement thermal extremes to artificially justify anomalous billing figures.
3. **Refusal of Empirical Line Testing:** Respondent has arbitrarily refused to perform standard diagnostic insulation and continuity testing (Megger testing and Time Domain Reflectometry) on the underground service line running from the yard transformer to the meter base, hiding behind superficial visual inspections that cannot detect subsurface insulation breakdown or current leakage.

III. FORMAL DEMANDS AND NOTICE OF LEGAL CONSEQUENCES

Complainants hereby demand that Respondent immediately, prior to or concurrently with the December 23, 2026 pre-hearing conference:

1. **Perform Physical Line Testing:** Execute comprehensive insulation resistance (Megger) and continuity testing on the underground service line in the presence of Complainants;
2. **Produce Raw Back-End Data:** Disclose all billing software, algorithms, rate adjustments, meter configurations, multipliers, and historical account data since account inception; and
3. **Comply with Discovery Obligations:** Cease all procedural stalling tactics and 50-day extension abuse designed to prejudice self-represented complainants.

TAKE NOTICE that failure to comply with these statutory and regulatory obligations under Chapters 386 and 393 RSMo and 20 CSR 4240-2.090 will result in Complainants holding Respondent and its responsible agents fully liable for all financial damages, sustained overbilling, and legal harms resulting from this bad-faith conduct, alongside formal escalation for sanctions before the Commission.

Respectfully submitted,

/s/ John Dady
John Dady
[redacted]

/s/ Deborah Hoyle
Deborah Hoyle