BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

John Dady & Deborah Hoyle, Complainants,

v.

Union Electric Company d/b/a Ameren Missouri, Respondent.

Case No. EC-2026-0349

COMPLAINANTS' MOTION TO COMPEL PHYSICAL LINE TESTING, BACK-END METER DATA, AND EXPEDITED DISCOVERY

Complainants, John Dady and Deborah Hoyle, respectfully move the Public Service Commission of the State of Missouri, pursuant to Chapters 386 and 393 of the Revised Statutes of Missouri (RSMo) and Commission discovery rule 20 CSR 4240-2.090, for an Order compelling Respondent, Ameren Missouri, to immediately perform empirical diagnostic testing on the underground service line and produce all back-end metering parameters, multipliers, disaggregation software, and raw data files. In support thereof, Complainants state:

I. AMEREN'S 50-DAY EXTENSION CREATES DIRECT PREJUDICE WITHOUT PROMPT DISCOVERY

1. Respondent Ameren Missouri was granted a 50-day extension to December 23, 2026, to prepare its formal response and defense in this proceeding.
2. Complainants cannot adequately prepare their case, evaluate utility claims, or cross-examine Respondent's theoretical assertions without access to raw technical data, line test diagnostics, and back-end billing parameters currently held exclusively by Ameren.

II. DEMAND FOR EMPIRICAL DIAGNOSTIC TESTING OF THE UNDERGROUND SERVICE LINE

1. Complainants have repeatedly requested physical diagnostic testing of the underground service line connecting the yard transformer to the meter base.
2. Respondent has refused to perform line testing, asserting without scientific basis that a superficial visual inspection of the surface terminals is sufficient to confirm service line integrity.

3. Visual surface inspection cannot detect subsurface insulation degradation, high-resistance faults, neutral breakdown, or current leakage into surrounding soil. Complainants formally demand an Order compelling Ameren to perform standard diagnostic line testing (including insulation resistance / Megger testing and Time Domain Reflectometry) to establish whether line loss or fault current is occurring on the utility side of the meter.

III. DEMAND FOR COMPLETE BILLING RECORDS, SOFTWARE, DISAGGREGATION SOFTWARE, ALGORITHMS, AND MULTIPLIERS SINCE INCEPTION

1. Complainants demand full and complete disclosure of everything associated with their billing since the inception of the account. Because this exceptionally high kilowatt-hour usage has persisted since account inception across multiple physical meters, single-meter defects are ruled out—pointing directly to chronic underground line defects or permanent back-end software, disaggregation software, algorithm, and multiplier errors. Ameren cannot blame recent equipment swaps. Consequently, Complainants require access to all software, disaggregation software, algorithms, multipliers, billing rates, rate adjustments, meter configurations, and every calculation or factor used to determine charges on Account #[redacted], alongside unredacted records for the August 25–26, 2026 open-breaker test window. Furthermore, given that this home was originally constructed as a model home, Complainants have formally demanded complete disclosure of all account multipliers, register scaling factors, raw interval data logs, and automated calculation algorithms applied to this account.

WHEREFORE, Complainants respectfully request an Order from the Commission:

1. Compelling Ameren Missouri to perform comprehensive diagnostic insulation and continuity testing on the underground service line within 14 days;
2. Compelling Ameren Missouri to produce all billing records, software, disaggregation software, algorithms, multipliers, and historical account data since inception within 14 days;
3. Compelling Ameren Missouri to perform a panel-versus-meter reconciliation consistent with its audit findings; and
4. Setting a strict compliance deadline well in advance of Ameren's December 23, 2026 defense filing date.

Respectfully submitted,

/s/ John Dady
John Dady
[redacted]

/s/ Deborah Hoyle
Deborah Hoyle

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was served via electronic mail / EFIS on this day, addressed to counsel of record for Respondent Ameren Missouri (Carla Fields Johnson) and Staff Counsel (Ray Cunneen).

/s/ John Dady
John Dady