EFIS Filing Submission & Master Evidentiary Audit: Case No. EC-2027-0044

LEGAL VIOLATIONS & REGULATORY NON-COMPLIANCE SPECIFICATIONS

1. Missouri Public Service Commission Practice & Billing Rules (20 CSR 4240-13):

- Violation of 20 CSR 4240-13.055 (Cold Weather Rule & Inability-to-Pay Protection): Respondent Ameren Missouri violated Commission rules by failing to maintain active low-income payment agreements and improperly triggering automated debit defaults upon the posting of valid third-party energy assistance grants (, DAEOC funds).
- Violation of 20 CSR 4240-13.015(V) (Definition of Payment): Respondent's automated billing software unlawfully failed to treat third-party agency assistance grants and customer remittances as "good and sufficient funds" dedicated to reducing principal debt, instead mischaracterizing them as breach events to accelerate deferred balances.
- Arbitrary and Capricious Tariff Enforcement: Respondent's automated software loop violates approved utility tariff provisions by artificially inflating monthly bills with unearned default accelerations [redacted] total) and duplicate security deposits ([redacted] assessed twice within 30 days in violation of standard deposit rules), creating a fictitious [redacted] balance on a household that maintains a true audited net credit position of [redacted].

2. Federal HUD Housing Regulations & Compliance Standards:

- Violation of HUD Handbook 4350.3 & HUD Form 50059 Mandates: Complainant's household operates under verified federal housing standards establishing a [redacted] Utility Allowance and a net monthly Utility Reimbursement Check (URC) of [redacted]. Property management and utility synchronization failures—resulting in erratic ledger adjustments and improper offsets—have illegally withheld mandatory utility reimbursement funds, directly interfering with Complainant's ability to maintain utility accounts.
- Violation of Violence Against Women Act (VAWA) Housing Protections (Form HUD-91066 / HUD-90105): Imposing unwarranted service disconnection threats, artificial debt

accelerations, and illegal duplicate security deposit fees against a vulnerable, verified zero-income household with three minor children constitutes severe financial deprivation and housing instability prohibited under federal VAWA guidelines.
3. Constitutional & Due Process Violations: - Denial of Due Process in Account Reconciliation: Respondent’s reliance on automated, opaque billing algorithms that override physical payment ledgers and grant postings without manual review violates the Missouri Public Service Commission's standard for fair, transparent, and accurate utility accounting.