

# BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Vas Construction, LLC, 4405 West Pine,	)	
St. Louis, MO. 63108,	)	
	)	
Complainant,	)	
	)	
v.	)	<b>File No. EC-2019-0399</b>
	)	
Union Electric Company d/b/a Ameren	)	
Missouri,	)	
	)	
Respondent	)	

## NOTICE OF DEFICIENCY

Issue Date: June 20, 2019

On June 17 2019, Vas Construction LLC (“Vas Construction”) filed a complaint with the Missouri Public Service Commission (“Commission”) against Union Electric Company d/b/a Ameren Missouri. Vas Construction’s complaint is signed by Shijing Cao, who is not identified as an attorney licensed to practice law in Missouri or any other state.

Missouri statute Section 484.020, RSMo 2016, restricts the practice of law to licensed attorneys. Consequently, Commission Rule 4 CSR 240-2.040(5), requires pleadings filed with the Commission to be signed by an attorney authorized to practice law in Missouri unless the entity signing the pleading is a natural person acting solely on his or her own behalf and representing only him or herself.<sup>1</sup> Vas Construction’s

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<sup>1</sup> See also *Clark v. Austin*, 340 Mo 467, 101 S.W. 2d 977 (Mo 1937); *Reed v. Labor and Indus. Relations Com’n*, 789 S.W.2d 19 (Mo 1990).

complaint is signed by Mr. Cao, who is not identified as an attorney licensed to practice in Missouri. The present complaint is filed on behalf of the corporation, Vas Construction, rather than by Mr. Cao as a natural person on his own behalf.

Therefore, Vas Construction's filing is deficient and the Commission cannot take action on this complaint until these deficiencies are corrected. The Commission will leave the file open until July 20, 2019, to allow Vas Construction to correct the deficiency. If no response is filed by that time, the Commission will reject the filing and close the file.



**BY THE COMMISSION**

A handwritten signature in dark ink that reads "Morris L. Woodruff".

Morris L. Woodruff  
Secretary

Charles Hatcher, Regulatory Law Judge,  
by delegation of authority pursuant to  
Section 386.240, RSMo 2016.

Dated at Jefferson City, Missouri,  
on this 20<sup>th</sup> day of June, 2019.

**STATE OF MISSOURI**

**OFFICE OF THE PUBLIC SERVICE COMMISSION**

**I have compared the preceding copy with the original on file in this office and I do hereby certify the same to be a true copy therefrom and the whole thereof.**

**WITNESS my hand and seal of the Public Service Commission, at Jefferson City, Missouri, this 20<sup>th</sup> day of June 2019.**



  
**Morris L. Woodruff**  
**Secretary**

**MISSOURI PUBLIC SERVICE COMMISSION**

**June 20, 2019**

**File/Case No. EC-2019-0399**

**Missouri Public Service  
Commission**

Staff Counsel Department  
200 Madison Street, Suite 800  
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**Union Electric Company**

Legal Department  
1901 Chouteau Avenue  
P.O. Box 66149, Mail Code 1310  
St. Louis, MO 63166-6149  
AmerenMOService@ameren.com

**Vas Construction LLC**

Legal Department  
PO Box 28514  
St. Louis, MO 63146  
accounting@revivalstl.com

***Enclosed find a certified copy of an Order or Notice issued in the above-referenced matter(s).***

***Sincerely,***

A handwritten signature in black ink that reads "Morris L. Woodruff". The signature is fluid and cursive, with the first letters of each word being capitalized and prominent.

**Morris L. Woodruff  
Secretary**

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Recipients listed above with a valid e-mail address will receive electronic service. Recipients without a valid e-mail address will receive paper service.