

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Brett Felber,)	
)	
Complainant,)	
)	
v.)	<u>File No. EC-2026-0004</u>
)	
Union Electric Company d/b/a Ameren)	
Missouri,)	
)	
Respondent.)	

**MOTION TO CONTINUE COMPLAINANT'S MOTION
FOR SUMMARY DETERMINATION**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), by and through the undersigned counsel, and for its *Motion to Continue Complainant's Motion for Summary Determination*, respectfully states to the Missouri Public Service Commission ("Commission") as follows:

1. On July 27, 2025, Complainant filed a *Motion for Summary Determination* and an additional pleading entitled *Complainant's Disputes*. The *Complainant's Disputes* alleged additional facts to which the Complainant claims there is no genuine issue, and referenced his *Complaint* and an attachment that allegedly shows a payment to Ameren Missouri from his bank account.
2. 20 CSR 4240-2.117(1)(D) states: "[f]or good cause shown, the commission may continue the motion for summary determination for a reasonable time to allow an opposing party to conduct such discovery as is necessary to permit a response to the motion for summary determination."

3. Ameren Missouri is awaiting receipt of a letter from Complainant's bank as discussed at the procedural conference on July 30, 2025.¹

4. Ameren Missouri also intends to issue additional discovery that is needed in order to respond to Complainant's allegations on payment history contained in the *Motion for Summary Determination* and *Complainant's Disputes*. As such, Ameren Missouri respectfully requests until September 30, 2025, to complete additional discovery and respond to the *Motion for Summary Determination*.

WHEREFORE, Ameren Missouri requests the Commission issue an Order continuing the *Motion for Summary Determination* until September 30, 2025, to allow Ameren Missouri to complete necessary discovery.

Respectfully submitted,

/s/Jennifer L. Hernandez

Jennifer L. Hernandez, MO Bar #59814

Corporate Counsel

1901 Chouteau Avenue, MC 1310

P.O. Box 66149

St. Louis, MO 63166-6149

(314) 978-8418 (Telephone)

(314) 554-4014 (Facsimile)

AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been emailed to the parties of record on this 26th day of August 2025.

/s/ Jennifer L. Hernandez

¹ See Tr. Vol. 1, p. 16, ll. 4-14, in response to Ameren Missouri's request for Complainant's bank letter at p. 11, l. 23 through p. 12, l. 5.