

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of:

Brett Felber and Lisa Lambert,

Complainants,

v.

Ameren Missouri,

Respondent.

File No. EC-2026-0128

(Reference: EC-2023-0395)

NOTICE FOR CLARIFICATION REGARDING PAYMENT AGREEMENTS AND DISPUTE RESOLUTION

I. PURPOSE

This Notice seeks clarification of Ameren Missouri's policy and sworn testimony regarding payment agreements and whether such agreements constitute acceptance of liability or waiver of dispute rights under Missouri law.

Ameren previously stated: "once a Payment Agreement was set up... the Complainant is accepting responsibility for that balance."

While Complainants appreciate that Ameren Missouri has offered a new payment agreement, Complainants expressly state that they do not wish to waive the merits of their dispute in this matter. Complainants do not want to accept any agreement that could be construed as waiving, limiting, or otherwise prejudicing the claims, defenses, and violations currently at issue in this proceeding.

II. GOVERNING LAW AND TARIFFS

Missouri law requires utilities to maintain just and reasonable practices (Section 393.130 RSMo) and comply with Commission oversight (Section 393.140 RSMo).

Relevant Commission rules include 20 CSR 4240-13.020 (billing), 20 CSR 4240-13.030 (disconnection), and 20 CSR 4240-13.045 (payment agreements and protections).

Ameren Missouri's filed tariffs governing deferred payment agreements, billing disputes, and disconnection procedures are directly implicated.

III. NEED FOR CLARIFICATION

Complainants request clarification whether entering into a payment agreement:

1. Constitutes settlement;
2. Constitutes admission of liability;
3. Waives dispute rights.

IV. ASSERTED VIOLATIONS

Complainants allege Ameren Missouri failed to comply with notice, disconnection, and billing requirements under Commission rules and tariffs, including failure to send required notices and billing inaccuracies.

V. PRESERVATION OF RIGHTS

Complainants do not waive any rights and intend to proceed on the merits while seeking to maintain service.

VI. REQUEST FOR RESPONSE

Complainants request Ameren Missouri clarify the legal effect of payment agreements and identify tariff provisions supporting its position.

Respectfully submitted,

/s/ Brett Felber

/s/ Lisa Lambert

Phone: [REDACTED]

Email: [REDACTED]

Email: [REDACTED]

Dated: March 27, 2026

CERTIFICATE OF SERVICE

I certify that a true and correct copy of this filing was submitted via EFIS and served upon all parties on March 27, 2026.

/s/ Brett Felber