

# BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION

In the Matter of the Complaint of  
Brett Felber and Lisa Felber (Lambert),  
Complainants,  
v.  
Ameren Missouri,  
Respondent.

FILED  
April 10, 2026  
Missouri Public  
Service Commission

**Case No. EC-2026-0218**

## **MOTION FOR SANCTIONS, FINDINGS OF VIOLATION, AND OTHER RELIEF**

### ***I. INTRODUCTION***

Complainants move the Commission for sanctions and findings against Ameren Missouri for violations of Commission rules, tariffs, and for misrepresentation.

### ***II. FACTUAL BACKGROUND***

Complainants made a payment of \$ [REDACTED] on April 9, 2026, satisfying any alleged agreement. Despite this, Ameren Missouri previously disconnected service without proper notice.

### ***III. VIOLATIONS***

Ameren Missouri violated:

- 20 CSR 4240-13.050(1) – Failure to provide proper notice.
- 20 CSR 4240-13.050(3) – Failure to attempt reasonable contact.
- Applicable tariff provisions governing discontinuance of service.

### ***IV. MISREPRESENTATION AND BAD FAITH***

Complainants assert that Ameren Missouri engaged in a pattern of misrepresentation and bad faith conduct. Evidence will show that statements made by Ameren Missouri personnel, including legal counsel Jennifer Hernandez and Regulatory Specialist Aubrey Krcmar, were inconsistent, misleading, and intended to distort the factual and regulatory record.

## ***V. REQUEST FOR RELIEF***

Complainants respectfully request that the Commission:

1. Find that Ameren Missouri violated Commission rules and tariffs;
2. Issue sanctions for misrepresentation and bad faith conduct;
3. Grant any further relief deemed just and proper.

## **CERTIFICATE OF SERVICE**

I certify that a copy of this Motion was served on all parties on April 10, 2026.

Brett Felber

Phone: [REDACTED]