

procedural closure of companion file Case No. EO-2026-0327 on May 21, 2026—that inadvertently fragment the unified consumer record.

Under long-standing Missouri case law, the Commission has an absolute duty to protect vulnerable consumers. In *State ex rel. DePaul Health Center v. Public Service Commission*, 564 S.W.2d 531, the Missouri courts established that the Commission's primary, fundamental purpose is the protection of the public interest and the health of the state's citizens. Furthermore, in *State ex rel. GS Technologies Operating Co. v. Public Service Commission*, 945 S.W.2d 539, the court affirmed that when a public utility monopoly's practices are alleged to be "unsafe" or "unjust," the Commission must mandate an investigation. Complainant asserts that allowing corporate entities to terminate or threaten life-sustaining energy and water utilities to a residence containing an infant and an adult suffering from [REDACTED] is an inherently unsafe, unjust, and unreasonable practice that lies squarely within the core jurisdiction of the full Commission panel.

II. STATEMENT OF COMMON PROCEDURAL AND MEDICAL FACTS

Administrative Dispute History: Complainant initiated a formal consumer dispute regarding the validity and mathematical calculation of all account ledgers in August 2024 under the auspices of RSMo § 407.020, as Respondents failed to provide an audited billing chain.

Actual Notice of Medical Emergency: Each named Respondent was where of with a valid, doing the critical medical needs program submitted with each utility company doctor-certified Medical Emergency Form in May 2025 and August 2025. This established absolute actual notice to the corporate entities that utility services at this address are life-sustaining necessities to manage the Complainant's [REDACTED].

Household Life-Safety Hazard: The residence at [REDACTED] currently shelters the Complainant and a newborn infant. Under RSMo § 393.130, utilities are strictly prohibited from executing collection actions that cause an immediate threat to human life and sanitary safety. The cessation of utility service under these conditions creates an unlawful public health hazard.

Discharge of Obligation via Lawful Tender: Complainant delivered a lawful tender of payment via an original Bill of Exchange and payment draft to each Respondent. Under Missouri Uniform Commercial Code statute RSMo § 400.3-603(b), the active refusal of a lawful tender of payment operates to completely discharge the underlying financial obligation to the exact extent of that tender. Respondents' ongoing billing of discharged balances, combined with the retention and non-crediting of the physical financial instruments, represents an unlawful conversion of property under RSMo § 400.3-420.

III. ITEMIZED SPECIFIC STATUTORY VIOLATIONS BY RESPONDENT

A. SPIRE MISSOURI INC. (Case No. GC-2026-0278)

Disputed Total Balance: \$ [REDACTED] (\$ [REDACTED] as of May 22, 2026).

Account Number of Record: [REDACTED].

1. The Medical Rule Violation: Spire Missouri Inc. was provided direct, physician-signed notice of Complainant's [REDACTED] on or around May 12, 2025, and August 2025. Under Missouri Code of State Regulations 20 CSR 4240-13.050(10), a gas corporation is legally required to postpone the discontinuance of utility service if it will aggravate an existing medical emergency of a permanent resident. Spire actively violated this

safety rule by maintaining a collection balance, assessing post-notification late penalties, and refusing to freeze account actions, converting a public safety obligation into an aggressive, predatory collection action. Because natural gas is required for mandatory climate control and respiratory protection, Spire's conduct violates the "safe and adequate" service standards of RSMo § 393.130.

2. The Consumer Verification and Fiduciary Violation: Complainant served Spire with a formal Notice of Claim of Interest to [REDACTED] on June 26, 2024, followed by an Acknowledgement of Utility Bill on February 3, 2025, demanding a certified, full account ledger. Spire has failed to provide this ledger, yet continues to demand a balance of \$ [REDACTED]. Demanding payment for an unverified sum without providing a historical accounting math chain is an unfair and deceptive trade practice under RSMo § 407.020. Furthermore, Spire accepted a lawful Bill of Exchange/payment draft and Notice of Beneficiary Interest on November 3, 2025. Retaining this instrument without applying an administrative credit or returning the property represents an unlawful conversion under RSMo § 400.3-420.

B. UNION ELECTRIC COMPANY - AMEREN MISSOURI (Case No. EC-2026-0279)

Disputed Total Balance: \$ [REDACTED] (as of May 22, 2026).

Account Number of Record: [REDACTED].

1. The Medical and Federal Crisis Accommodation Violation: Ameren Missouri was given actual notice in May 2025 and August 2025 that electricity is a mechanical necessity for life-saving breathing treatments to manage Complainant's Chronic Asthma. Furthermore, the state and utility were notified that health-related energy crisis assistance paid for the specific bill

period of 07/03/2025–08/04/2025 was processed. Under federal mandate 45 CFR § 96.84, utilities

must provide formal administrative accommodations for health-related energy crises. Ameren committed a severe violation of the Commission's safety oversight under RSMo § 393.140 by actively executing a physical service disconnection on March 14, refusing to overlook the chronic

medical condition and endangering both a medically fragile adult and a newborn infant.

2. The Debt Verification and Refusal of Tender Failure: Complainant formally disputed the balance and requested debt validation on March 23, 2025, following initial disputes in August 2024. Under the Fair Debt Collection Practices Act (FDCPA), 15 U.S.C. § 1692g, a creditor must cease collection and provide verification via a certified "Life of Account Ledger" once a consumer disputes a debt. Ameren has failed to produce this ledger. Demanding payment

and disconnecting power for an unverified and disputed sum represents an unfair and deceptive practice under RSMo § 407.020. Additionally, Ameren was served an Affidavit of Notation on October 25, 2025, and a lawful Bill of Exchange on March 24, 2025. Under RSMo § 400.3-603(b),

Ameren's active refusal of this lawful tender discharges the obligation to the extent of that tender, rendering subsequent disconnection actions illegal.

C. MISSOURI AMERICAN WATER CO. (Case No. WC-2026-0287)

Disputed Total Balance: \$ [REDACTED] (as of May 22, 2026).

Account Number of Record: [REDACTED].

1. The Administrative and Fiduciary Record-Keeping Failure: Complainant submitted formal administrative requests to update the consumer account of record to the "Germany

Family Trust" in 2024. Respondent's complete failure to execute this ministerial, administrative task resulted in structurally inaccurate corporate record-keeping, violating the consumer's right to transparent billing and accurate data representation under RSMo § 407.020.

2. The Public Health Emergency and Tender Violation: Water is an absolute, non-negotiable human necessity for hygiene, sanitation, and physical survival. Complainant submitted a doctor-authorized medical emergency certification program by a formal dispute letter on or around the September 12, 2025, billing cycle. Depriving a home housing a healing mother and an infant of running water creates an immediate public health hazard and severe environmental triggers for [REDACTED] violating the "safe and adequate" service mandate of RSMo § 393.130.

Furthermore, Missouri American Water is currently demanding \$ [REDACTED] despite having been served a Notice of Claim of Interest on June 26, 2024, an Affidavit of Notation on November 28, 2024, and a valid Bill of Exchange payment draft alongside a Beneficiary Interest Notice on March 24, 2025. Respondent's refusal of a lawful tender operates to discharge the debt under RSMo § 400.3-603(b), and their retention of the asset without application of credit constitutes an unlawful conversion under RSMo § 400.3-420.

IV. COMPLAINANT'S SUPPLEMENTAL DEMAND FOR COMPLIANCE DISCLOSURE, UNREPORTED FINANCIAL OFFSETS, AND FINANCIAL DEPOSIT

Pursuant to the Commission's inherent regulatory power under RSMo § 393.140 to examine and mandate transparency in the financial accounts of public utility corporations, Complainant hereby serves this Supplemental Demand upon Respondents:

1. Securitization and CUSIP/ISIN Disclosure: Respondents are demanded to produce

August 2024, all subsequent adverse collection and disconnection activities are unlawful.

WHEREFORE, Complainant respectfully moves the full Panel of Five Public Service Commissioners to vacate any delegated orders of dismissal or closure, grant this Application for Rehearing, issue an immediate emergency order staying all disconnection activities, mandate

the immediate physical restoration of any terminated service to [REDACTED] and order Respondents to produce a certified, full forensic Life of Account Ledger within ten (10) days.

Dated: May 22, 2026

Respectfully submitted,

/s/ Latrell S. Germany

[REDACTED]

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Omnibus Application for Rehearing, Application for Full Commission Review, and Revised Definitive Statement was served via electronic mail on this 22nd day of May, 2026, to the following designated attorneys of record and the Commission Secretary:

Spire Missouri Inc.

Attn: J. Antonio Arias

Email: [REDACTED]

Union Electric Company (Ameren Missouri)

Attn: Jennifer Hernandez / Service Desk

Email: [REDACTED]

Missouri American Water Co.

Attn: Jennifer Coleman

Email: [REDACTED]

Missouri Public Service Commission

Attn: Nancy Dippell, Commission Secretary

Email: [REDACTED]

/s/ Latrell S. Germany