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November 10, 2011

**FILED<sup>3</sup>**

**MAY 21 2012**

**Missouri Public  
Service Commission**

Mr. Brent Roam  
Bryan Cave, LLP  
211 North Broadway, Suite 3600  
St. Louis, MO 63102-2750

Re: Case No. EU-2012-0027 – MIEC's First Set of Data Requests (DRs)

Dear Brent:

This letter contains the Company's objections to the above-referenced DRs.

DRs 1-1, 1-4, and 1-5: The Company objects to these DRs on the grounds that they are not relevant to any issue in this case, they are not reasonably calculated to lead to the discovery of admissible evidence, they seek opinions rather than facts known or documents that exist and are thus beyond the proper scope of discovery, and because to the extent they seek any advice counsel may or may not have given or any research or opinions that counsel may or may not have done (or may or may not have) they seek information protected from disclosure by the attorney-client and work product privileges.

DRs 1-2 and 1-3: The Company objects to these DRs on the ground that they seek information not relevant to any issue in this case, they are not reasonably calculated to lead to the discovery of admissible evidence, and they are overbroad and unduly burdensome.

DR 1-6: The Company objects to this DR on the ground that it seeks information which has already been provided to MIEC. Specifically, such information has been the subject of testimony provided by the Company in Case No. EO-2010-0255, and recent Company rate cases, to which MIEC has been a party.

DR 1-9: The Company objects to this DR on the ground that it seeks information not relevant to any issue in this case and because it is not reasonably calculated to lead to the discovery of admissible evidence.

DR 1-10: The Company objects to this DR on the ground that it is unclear what data is being requested and because the request is unduly burdensome insofar as MIEC already has access to whatever data is sought since MIEC was a party to each of the Company's last three rate cases

Ameren Exhibit No. 6  
Date 5-03-12 Reporter XF  
File No. EU-2012-0027

DRs 1-11 and 1-12: The Company objects to these DRs on the ground that they seek information not relevant to any issue in this case and are not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, an answer to each will be provided.

DRs 1-13 and 1-14: The Company objects to these DRs on the ground that they seek information not relevant to any issue in this case and are not reasonably calculated to lead to the discovery of admissible evidence. With respect to DR 1-14, it is also objectionable in requesting information from Ameren (interpreted to mean Ameren Corporation) in that it is overbroad and beyond the scope of discovery to the extent it seeks information relating to the business, affairs, or operations of affiliates of Ameren Missouri, other than information relating to transactions occurring between Ameren Missouri and its affiliates or goods or services exchanged between Ameren Missouri and its affiliates and, consequently, it is also irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Sincerely

**/s/ James B. Lowery**

James B. Lowery

Cc: Tom Byrne; Jeanine Moentmann; Mary Hoyt; Cheryl Lobb