

filing testimony and/or schedules containing similar information that implicates the same issues raised by Co-Mo.

3. 20 CSR 4240-2.135(4) allows additional protection beyond that provided by a mere “confidential” designation upon the filing of a motion explaining what information must be protected, the harm that might occur if the information did not receive the additional protection, and an explanation of how the information may be disclosed while protecting the interests of the disclosing party and the public.

4. The information to be protected consists of detailed infrastructure plans and financial, rate, cost, and revenue assumptions and analyses respecting service to the area in question. The nature of this information is the same as the information for which Co-Mo has claimed HC treatment. The harm if the additional protection is not afforded would be to Ameren Missouri’s competitive interests, as the Commission found was true of Co-Mo, since Ameren Missouri does have to compete with Co-Mo or other cooperatives for certain areas. The information may be disclosed while protecting Ameren Missouri’s and the public’s interests in the same way Co-Mo’s HC information was protected, that is, by issuance of a protective order.

5. For the foregoing reasons, as found by the Commission in the above-referenced *Order Granting Motion for Protective Order* (“Co-Mo Protective Order”), and as addressed in the Commission’s March 30, 2022 *Order Regarding Ameren Missouri’s Motion to Allow Selected Access to Highly Confidential Information and Motion for Expedited Treatment* (“Selected Access Order”), Ameren Missouri requests issuance of a protective order for Ameren Missouri HC information as described herein, on the same terms and conditions set forth in the ordering provisions of the Co-Mo Protective Order. Ameren Missouri suggests that such an order be without prejudice to Co-Mo’s ability to make a filing with the Commission and satisfactorily make the showing that Ameren Missouri made when it sought permission for certain selected individuals

to have access to Co-Mo's HC information. Should Co-Mo desire to make such a filing, such individuals should not have, now or prospectively, involvement in competition with Ameren Missouri, and should not have reporting relationships or otherwise be in the "chain of command" with those who do.¹

WHEREFORE, Ameren Missouri requests issuance of a protective order on the terms provided for herein.

Respectfully submitted,

/s/ James B. Lowery

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COMPANY d/b/a AMEREN MISSOURI**

¹ This is a matter upon which agreement might be reached between Co-Mo and Ameren Missouri, depending on the details of any such proposal made by Co-Mo.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 30th day of March 2022, served the foregoing either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

/s/James B. Lowery
James B. Lowery