

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

Keelee Swopshire,)	
)	
Complainant,)	
)	
v.)	File No. EC-2022-0148
)	
Union Electric Company d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI’S
RESPONSE TO STAFF’S MOTION FOR GUIDANCE AND
COMPLAINANT’S RESPONSE**

Comes Now, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) who for its Response to Staff’s Motion for Guidance and Complainant’s Response states as follows:

1. On March 22, 2022, Staff filed its Motion for Guidance Regarding Confidential Information. The Motion sought the Commission’s guidance on how to treat confidential information of a customer who is not a party to this proceeding.
2. Respondent, without objection, timely submitted responses to Data Requests (“DRs”) propounded by Commission Staff through EFIS in accordance with Commission Rule 20 CSR 4240-2.090(2)(H) and marked all responses confidential with a customer-specific designation.
3. Ameren Missouri was not aware that the Complainant had default access to confidential information in EFIS as described in Staff’s Motion, and is not aware of the Complainant accessing the confidential DR responses through EFIS.
4. Ameren Missouri takes no position on the issue of whether Complainant should be required to execute a Non-Disclosure Agreement (“NDA”) before receiving confidential information, or whether in lieu of Complainant signing a NDA the customer identifying information be redacted. Ameren Missouri will redact the responses if so directed.

5. Ameren Missouri has no objection to the term “Customer X” being substituted with “Confidential Party” or “Name Redacted for Confidentiality.”

Respectfully submitted,

Banks Law LLC

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**Counsel for Union Electric Company d/b/a
Ameren Missouri**

CERTIFICATE OF SERVICE

I hereby certify that on March 28, 2022, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record. A copy has also been emailed to them by the undersigned.

/s/ Eric Kendall Banks