

Confidential Designation 20 CSR 4240-2.135 (2)

(A) Any person may submit to the commission, without first obtaining a protective order, information designated as confidential if that information is—

- 1. Customer-specific information;
- 2. Employee-sensitive personnel information;
- 3. Marketing analysis or other market-specific information relating to services offered in competition with others;
- 4. Marketing analysis or other market-specific information relating to goods or services purchased or acquired for use by a company in providing services to customers;
- 5. Reports, work papers, or other documentation related to work produced by internal or external auditors, consultants, or attorneys, except that total amounts billed by each external auditor, consultant, or attorney for services related to general rate proceedings shall always be public;
- 6. Strategies employed, to be employed, or under consideration in contract negotiations;
- 7. Relating to the security of a company's facilities; or
- 8. Concerning trade secrets, as defined in section 417.453, RSMo.

**The information which remains designated as confidential in the revised pleading is information that, if released, could allow interested parties to back into a calculation of the COVID-related costs related to security, etc. Because securing necessary services could involve putting services out for bid, it could provide an advantage to potential bidders that allow them to skew their bids and contract terms. Additionally, release of this information could allow competitors for these services to ascertain the Company's maximum bidding ability and outbid the Company for services. The Company could lose market viability, and ultimately pay higher costs to remain competitive. The end result could be higher bids, fewer bidders, and potentially higher costs to Ameren Missouri's customers, which serves no public purpose.