

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

Roman Dzhurinskiy and	)	
Zinaida Dzurinskaya,	)	
Complainants,	)	
	)	
vs.	)	Case No: EC-2016-0001
	)	
Union Electric Company, d/b/a	)	
Ameren Missouri,	)	
Respondent.	)	

**NOTICE TO TAKE DEPOSITION**

**To:**

Mr. Roman Dzhurinskiy	Mr. Timothy Opitz	Mr. Hampton Williams
Ms. Zinaida Dzhurinskaya	Office of Public Counsel	MO Public Service Commission
32 Crabapple Ct.	<a href="mailto:timothy.opitz@ded.mo.gov">timothy.opitz@ded.mo.gov</a>	<a href="mailto:hampton.williams@psc.mo.gov">hampton.williams@psc.mo.gov</a>
St. Louis, Missouri 63132	<a href="mailto:opcservice@ded.mo.gov">opcservice@ded.mo.gov</a>	<a href="mailto:staffcounsel@psc.mo.gov">staffcounsel@psc.mo.gov</a>
<a href="mailto:srodzhur@gmail.com">srodzhur@gmail.com</a>		

You are hereby notified that the undersigned counsel for defendant Union Electric Company d/b/a Ameren Missouri will take the deposition of Heather Jones of the Missouri Department of Social Services Family Support Division on Monday, October 26, 2015, beginning at 9:00 a.m., and continuing day to day until complete, at the Smith Lewis, LLP conference room located at 111 S. 9<sup>th</sup> St., Ste. 200, Columbia, Missouri.

Please take further notice that the deponent is directed to bring to the deposition the documents identified in Exhibit A attached hereto.

Respectfully submitted:

SMITH LEWIS, LLP

/s/ Sarah E. Giboney  
James B. Lowery, #40503  
Sarah E. Giboney, #50299  
111 South Ninth Street, Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
(573) 443-3141  
(573) 442-6686 (Facsimile)  
lowery@smithlewis.com

[giboney@smithlewis.com](mailto:giboney@smithlewis.com)

/s/ Matthew R. Tomc  
Matthew R. Tomc, #66571  
Corporate Counsel  
Ameren Missouri  
One Ameren Plaza  
1901 Chouteau Avenue  
St. Louis, MO 63103  
(314) 554-4673  
(314) 554-4014 (FAX)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

Attorneys for Union Electric Company d/b/a  
Ameren Missouri

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Notice To Take Deposition was served on all the following parties via electronic mail, and additionally on Complainants via regular mail, this 16th day of October, 2015.

Missouri Public Service Commission  
[Hampton.Williams@psc.mo.gov](mailto:Hampton.Williams@psc.mo.gov)  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Hampton.williams@psc.mo.gov](mailto:Hampton.williams@psc.mo.gov)  
[staffcounsel@psc.mo.gov](mailto:staffcounsel@psc.mo.gov)

Office Of Public Counsel  
Timothy Opitz  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[timothy.opitz@ded.mo.gov](mailto:timothy.opitz@ded.mo.gov)  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)

Roman Dzhurinskiy  
Zinaida Dzurinskaya  
32 Crabapple Ct.  
St. Louis MO 63132  
[srodzhur@gmail.com](mailto:srodzhur@gmail.com)

/s/ Sarah E. Giboney  
Sarah E. Giboney

EXHIBIT A  
TO SUBPOENA DUCES TECUM

- a. a copy of the 2015/2016 LIHEAP application;
- b. a copy of the most recent version of the Department of Social Services Family Support Division LIHEAP Policies and Procedures Manual;
- c. a copy of the State of Missouri's executed FFY 2016 LIHEAP model plan/grant application, with all attachments referenced in the plan, if any.
- d. a specimen or sample contract identical in form to executed contracts by and between the Missouri Department of Social Services Family Support Division and the Contract Agencies (community action agencies) that perform intake and eligibility determination functions for the Energy Assistance component of LIHEAP and that administer ECIP funds, with all attachments referenced in the contract, if any;
- e. a copy of the DSS/FSD Security Access and Confidentiality Agreement form referenced in the above-referenced sample Contract Agency contract;
- f. a specimen or sample contract identical in form to executed LIHEAP Supplier Contracts by and between the Missouri Department of Social Services Family Support Division and Home Energy Suppliers, with all attachments referenced in contract, if any;
- g. any release or waiver forms by which the Missouri Department of Social Services Family Support Division obtains the consent of an applicant or recipient of benefits to release to third parties information otherwise required by §208.120 RSMo not to be disclosed.