

**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.	)	

**AMENDED NOTICE TO TAKE DEPOSITION**

<b>TO:</b>	Mr. Roman Dzhurinskiy	Timothy Opitz	Hampton Williams
	Ms. Zinaida Dzhurinskaya	Office Of Public Counsel	200 Madison Street, Suite 800
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		<a href="mailto:opcservice@ded.mo.gov">opcservice@ded.mo.gov</a>	<a href="mailto:staffcounsel@psc.mo.gov">staffcounsel@psc.mo.gov</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 on Tuesday, October 27, 2015, beginning at 9:00 a.m., and continuing day to day until complete, at the Law Offices of Smith Lewis, LLP, 111 S. 9<sup>th</sup> St., Suite 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

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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 Amended Notice to Take Deposition was served on all parties via electronic mail and additionally on Complainants via regular mail, this 20<sup>th</sup> day of October, 2015.

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/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.