

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

In the Matter of Union Electric Company, d/b/a )  
AmerenUE's Tariff to Increase Its Annual )  
Revenues for Electric Service. )

**Case No. ER-2011-0028**  
Tariff No. YE-2011-0116

**NOTICE OF OBJECTION TO DATA REQUEST**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and hereby advises Union Electric Company, doing business as Ameren Missouri, that it objects to all six (6) parts of Data Request ("DR") Ameren Missouri-Staff 014, dated March 18, 2011, a true and correct copy of which is attached hereto, for the reasons specified below. Staff is filing this objection and the attached DR in the case in order to advise the Commission and the Commission's General Counsel of its nature without violating the Commission's rules concerning *ex parte* and extra-record communications, see Rule 4 CSR 240-4.020.

1. Staff does not possess or control expense records, expense estimates, assessment statements, apportionment workpapers, budget proposals, annual budgets, financial statements, or similar items within the scope of the DR of "the Commission" or "any Commissioner." Ameren Missouri must seek those elsewhere, presumably from the Commission's General Counsel. While Staff is a party to this proceeding, and is represented by Staff Counsel's Office, the Commission itself is not.

2. The information sought is not relevant to any issue involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.

3. The request is overbroad and burdensome and is made for improper purposes.

4. To the extent that any of the information sought is a "closed record" or otherwise need not be disclosed pursuant to a request under Chapter 610, RSMo, it is privileged from discovery.

**WHEREFORE**, Staff prays that the Commission will quash the attached DR and grant it such other and further relief as it deems just in the circumstances.

Respectfully submitted,

s/ Kevin A. Thompson  
**KEVIN A. THOMPSON**  
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Attorney for the Staff of the Missouri Public  
Service Commission.

### **Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **23<sup>rd</sup> day of March, 2011**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson

Data Information Request  
From Union Electric Company d/b/a Ameren Missouri  
MPSC Case No. ER-2011-0028

Requested From: Missouri Public Service Commission Staff

Requested By: Russ Mitten

Date of Request: March 18, 2011

**Information Requested:**

Please provide all documents, records, or other information that is responsive to the following requests for each of the Commission's past four (4) fiscal years:

1. All documents and records that show, explain, or describe expenses incurred by the Commission, any Commissioner, or any Commission staff member for activities sponsored by or related to the National Association of Regulatory Utility Commissioners (the "NARUC"), the Mid-America Regulatory Conference (the "MARC"), or any other similar group or organization.
2. All documents or records that show, explain, or describe the portion of the expenses incurred by the Commission, any Commissioner, or any Commission staff member for activities sponsored by or related to the NARUC, the MARC, or any other similar group or organization that: 1) was included in the estimate of expenses made by the Commission pursuant to Section 386.370.1, RSMo, or 2) was included in the statement of assessment made pursuant to Section 386.370.3, RSMo.
3. All documents or records that show, explain, or describe the basis on which the Commission apportioned any of the expenses referenced in request 2 above.
4. All documents or records that: 1) were prepared by the Commission, or that the Commission relied on, to quantify or describe the benefits that accrued to the Commission and/or Missouri ratepayers from costs included in the estimates or assessments made pursuant to Section 386.370, RSMo, for activities sponsored by or related to the NARUC, the MARC, or any other similar group or organization; and 2) were submitted to the Missouri Department of Economic Development or the Missouri General Assembly as part of the review or approval of the Commission's annual budget or appropriation.

5. The Commission's annual budgets that show, explain, or describe proposed expenditures for activities sponsored by or related to the NARUC, the MARC, or any other similar group or organization, and all documents used to prepare the portions of those budgets that relate to such expenditures.
  
6. All budgets, financial statements, or other documents or records that show, explain, or describe the actual or proposed annual expenditures of the NARUC, the MARC, or any other similar group or organization for which the Commission, any Commissioner, or any Commission staff member incurred expenses that were charged to or paid by the Commission.

**Response:**

Response Provided By: \_\_\_\_\_ Date: \_\_\_\_\_