

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

Jimmie E. Small,)	
Complainant,)	
)	
vs.)	Case No: EC-2015-0058
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
Respondent.)	

**AMEREN MISSOURI'S OBJECTIONS TO
COMPLAINANT'S "INTERROGATORIES TO RESPONDENT UTILITY
MANAGEMENT, KATHY HART AGENT FOR UE.AM.MO"**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri"), by and through counsel, and for its objections to Complainant's "Interrogatories to Respondent Utility Management, Kathy Hart Agent for Ue.Am.Mo" (the "Interrogatories") states as follows:

Objections

Ameren Missouri objects to each and every individual interrogatory in Complainant's Interrogatories, because they are all untimely, having been served on Ameren Missouri on May 15, 2015, nearly a month after the evidentiary hearing in this Complaint had concluded, and because given the status of the proceedings in this Complaint, the Interrogatories are beyond the scope of discovery permitted by R. 56.01(b)(1). The Interrogatories are not reasonably calculated to lead to the discovery of admissible evidence in this Complaint, because the time for admitting evidence has passed. At this point, the record stands submitted to the Commission for determination, because briefs have been filed. 4 CSR 240-2.150(1). It is too late for Complainant to request that the Commission reopen the record to take additional evidence in this Complaint, including evidence that might be obtained from responses to these Interrogatories. "A party may request that the Commission reopen the record for the taking of additional evidence *if the request is made after the hearing has been concluded, but before briefs have been filed* or oral argument presented...Such a request shall be made by filing a motion to reopen the record for the taking of additional evidence...[.]" 4 CSR 240.110(8).

SMITH LEWIS, LLP

/s/ Sarah E. Giboney

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)
giboney@smithlewis.com

/s/ Matthew R. Tomc

Matthew R. Tomc, #66571
Corporate Counsel
Ameren Missouri
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-4673 (phone)
(314) 554-4014 (fax)
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 Ameren Missouri's Objections to "Interrogatories to Respondent Utility Management, Kathy Hart Agent for Ue.Am.Mo" were served on Jimmie E. Small via certified and regular mail on this 28th day of May, 2015, and on the other parties hereto via email, this 28th day of May, 2015.

Missouri Public Service Commission
200 Madison Street, Suite 800
P.O. Box 360
Jefferson City, MO 65102
staffcounsel@psc.mo.gov
Cydney.Mayfield@psc.mo.gov

Office Of Public Counsel
200 Madison Street, Suite 650
P.O. Box 2230
Jefferson City, MO 65102
opcservice@ded.mo.gov

Jimmie E. Small
606 W. Highway 2
Milton, Iowa 52570

/s/ Sarah E. Giboney
Sarah E. Giboney