

**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

**STAFF'S MOTION TO QUASH DEPOSITION  
AND MOTION FOR EXPEDITED TREATMENT**

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and for its Motion to Quash the Notice of Deposition for Lena Mantle, issued by Ameren Missouri on April 18, 2011, states as follows:

1. Depositions may be taken in actions pending before the Commission on the same basis, and used for the same purposes, as in civil actions in the circuit courts.
2. Counsel for Ameren Missouri took the deposition of Staff witness Lena Mantle on Wednesday, April 13, 2011.
3. Counsel for Ameren Missouri has now issued a second Notice of Deposition for Lena Mantle for Monday, April 25, 2011.
4. Staff objects to a second deposition of Lena Mantle. Counsel for Ameren freely scheduled its first deposition of this witness and could have timed it later in the case preparation sequence. Only counsel for Ameren is to blame for scheduling the deposition of Ms. Mantle prior to the filing of her surrebuttal testimony.
5. Staff further objects because this second deposition is unnecessary, oppressive, harassing, and will obstruct and impede Staff's preparation for the evidentiary hearing in this matter that begins the following day.

6. Staff further requests that the Commission take up and determine this motion on an expedited basis in order to provide a ruling for the guidance of the parties prior to April 25, 2011.

**WHEREFORE**, Staff prays that the Commission will take up this matter on an expedited basis and will quash the Notice of Deposition issued this day by Ameren Missouri for the deposition on oral examination of Lena Mantle on April 25, 2011; and grant such other and further relief as may be just in the premises.

Respectfully submitted,

s/ 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 **18<sup>th</sup> day of April, 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