

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

Keelee Swopshire,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. EC-2022-0148
	)	
Union Electric Company d/b/a	)	
Ameren Missouri,	)	
	)	
Respondent.	)	

**UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI'S  
RESPONSE TO COMPLAINANT'S PROPOSED WITNESSES TO CLARIFY ON  
WHOSE BEHALF WITNESSES WILL BE CALLED**

Comes Now, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) who for its Response to Complainant’s Stipulated Facts, Position Statement and Proposed List of Issues, Witnesses, and Order of Cross-Examination in Accordance with the Missouri Public Service Commission’s April 27, 2022 Order states:

1. On June 4, 2022, Complainant filed her Stipulated Facts, Position Statement and Proposed List of Issues, Witnesses, and Order of Cross-Examination in Accordance with the Missouri Public Service Commission’s April 27, 2022 Order.
2. She states on page five, “I will testify on my own behalf. I also plan to call as direct witnesses Ameren’s named employees Aubrey Krcmar and Mark Braun.”
3. On June 8, 2022, the Staff of the Missouri Public Service Commission on behalf of itself and Ameren Missouri filed its List of Issues, List of Witnesses, and Order of Cross Examination, which appropriately listed Aubrey Krcmar and Mark Braun as witnesses for Ameren Missouri.
4. Aubrey Krcmar and Mark Braun are Ameren Missouri employees, and will be presented by Ameren Missouri as witnesses at the scheduled hearing. These witnesses will then be available for Complainant to cross-examine. Aubrey Krcmar and Mark Braun are not witnesses

on behalf of Complainant and should not have been included in Complainant's list of direct witnesses.

**WHEREFORE**, for the aforementioned reasons Ameren Missouri moves that Complainant be forbidden from calling Aubrey Krcmar and Mark Braun as direct witnesses.

Respectfully submitted,

**Banks Law LLC**

/s/ Eric Kendall Banks

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**Counsel for Union Electric Company d/b/a  
Ameren Missouri**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2022, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record. A copy has also been emailed to them by the undersigned.

/s/ Eric Kendall Banks