

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

Craig Mershon,)	
Complainant,)	
)	
vs.)	Case No: EC-2013-0521
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
Respondent.)	

**AMEREN MISSOURI’S OBJECTIONS AND RESPONSES TO
COMPLAINANT’S FIRST SET OF DOCUMENTS FOR A MOTION TO PRODUCE
 (“REQUEST FOR PRODUCTION OF DOCUMENTS”)**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”), by and through counsel, and for its objections and responses to Complainant’s Request for Production of Documents Upon Ameren Missouri states:

General Objections Applicable to All Requests Made to Company

Ameren Missouri objects to all of the requests made to it by Complainant (under the heading “Documents From Union Electric Company or Ameren Missouri”) for the reasons that said requests were not properly served on the Company and were untimely, in that they were not served by the discovery deadline of February 7, 2014 set forth in the Order Amending Procedural Schedule in this case issued and effective January 31, 2014.

Specific Objections and Responses

1. All tariffs regarding the operation of Ameren Missouri for the benefit of the customers in St. Louis Missouri.

OBJECTION AND RESPONSE to Request 1:

Ameren Missouri objects to Request 1 because it is overly broad, lacks any reasonable particularity, seeks many documents that are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, is unduly burdensome and seeks information equally

available to Complainant. Subject to and without waiving said objection, the Company responds that Complainant may access all the Company's tariffs through the internet, at <http://www.ameren.com/sites/ae/Rates/Pages/ratesBundledElecFullSrvMO.aspx>.

2. All tariffs regarding the rules and regulations outlining the treatment of the indigent.

OBJECTION AND RESPONSE to Request 2:

Ameren Missouri objects to Request 2 because it is vague and ambiguous, and seeks documents that are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that its only tariffs that might reasonably be interpreted to be related to the treatment of the indigent relate to the Company's Multi-Family Low Income Program available to dwelling units where the typical residents will be elderly or disabled individuals or families whose income is deemed low under certain federal standards, and a Weatherization Program funded by the Company and administered by a State agency, which provides grants to low income individuals for weatherization services. Complainant may access tariffs regarding these programs through the internet, at

<http://www.ameren.com/sites/ae/Rates/Pages/ratesBundledElecFullSrvMO.aspx>.

3. All tariffs regarding the treatment of people with disabilities in general.

OBJECTION AND RESPONSE to Request 3:

Ameren Missouri objects to Request 3 because it is vague and ambiguous, and seeks documents that are irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that its only tariffs that might reasonably be said to be related to the treatment of people with disabilities might be the tariff regarding the Multi-Family Low Income Program described in Response 2, above.

4. All tariffs regarding the treatment of African Americans.

OBJECTION AND RESPONSE to Request 4:

Ameren Missouri objects to Request 4 because it seeks documents, which, if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible

evidence. Subject to and without waiving said objection, the Company responds that it has no Company tariffs that address African Americans specifically.

5. All tariffs regarding the people with disabilities who use electric motorized equipment to sustain their lives.

OBJECTION AND RESPONSE to Request 5:

Ameren Missouri objects to Request 5 because it seeks documents that if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that it has no Company tariffs that address people with disabilities who use electric motorized equipment to sustain their lives.

6. All tariffs outlining the amount of Dollar More the company uses to assist customers.

OBJECTION AND RESPONSE to Request 6:

Ameren Missouri objects to Request 6 because it seeks documents that if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that it has no Company tariffs that address the Company's Dollar More program. As an aid to Complainant, the Company notes that Complainant may access information about the program available to the public through the internet at <http://www.ameren.com/sites/AUE/DollarMore/Pages/DollarMoreHome.aspx>.

a. 7 [sic] All tariffs outlining positive interaction with customers.

OBJECTION AND RESPONSE to Request 6.a.:

Ameren Missouri objects to Request 6.a. because it seeks documents that if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that there are no Company tariffs that outline or otherwise address positive interactions with customers.

7. All tariffs outlining the due process system within the Customer Service Department.

OBJECTION AND RESPONSE to Request 7:

Ameren Missouri objects to Request 7 because it seeks documents that if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that there are no Company tariffs that outline or otherwise address a Company due process system related to customer service.

8. All tariffs outlining the due process system within the Administrative Level above the Customer Service Department.

OBJECTION AND RESPONSE to Request 8:

Ameren Missouri objects to Request 8 because it seeks documents that if they existed, would be irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, the Company responds that there are no Company tariffs that outline or otherwise address a Company due process system, at any level.

9. A list of customer service representatives within Ameren Missouri and their supervisors.

OBJECTION to Request 9:

Ameren Missouri objects to Request 9 to the extent it does not seek production of any designated document or thing but calls instead for the Company to compile data on Complainant's behalf, because the information sought is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, and because it is sought for the purposes of harassing, oppressing or annoying Company representatives and not a legitimate discovery purpose.

10. A list of the regulations regarding the Cold Weather [sic] Rule.

OBJECTION AND RESPONSE to Request 10:

Ameren Missouri objects to Request 10 to the extent it does not seek production of any designated document or thing within the Company's possession, custody or control but instead calls instead for the Company to compile a list of regulations on Complainant's behalf. Further, the regulations to be included in such a list are not within the exclusive

possession, custody or control of the Company and are equally available to Complainant such that he may compile his own list. Subject to and without waiving said objection, the Company responds as an aid to Complainant that Complainant may access all regulations regarding the Cold Weather Rule, 4 CSR 240-13.055, via the internet at <http://www.sos.mo.gov/adrules/csr/current/4csr/4c240-13.pdf>.

11. A list of the regulations regarding the Hot Whether [sic] Rule.

OBJECTION AND RESPONSE to Request 11:

Ameren Missouri objects to Request 11 to the extent it does not seek production of any designated document or thing within the Company's possession, custody or control but instead calls instead for the Company to compile a list of regulations on Complainant's behalf. Further, the regulations, if they existed, to be included in such a list would not be within the exclusive possession, custody or control of the Company and would be equally available to Complainant such that he may compile his own list. Subject to and without waiving said objection, the Company responds that there are no regulations for the Hot Weather Rule, but as an aid to Complainant notes that he may access the applicable statute, §393.108 RSMo via the internet at <http://www.moga.mo.gov>.

12. A copy of the yellow disconnection notice.

OBJECTION AND RESPONSE to Request 12:

Ameren Missouri objects to Request 12 because it is vague and ambiguous in that the Company does not know which notice Complainant is referring to. Subject to and without waiving said objection, the Company attaches the document marked **Request 12**, which document was also attached to the Company's Answer to Complainant's Complaint as Exhibit D.

13. A copy of the red disconnection notice.

OBJECTION AND RESPONSE to Request 13:

Ameren Missouri objects to Request 13 because it is vague and ambiguous in that the Company does not know which notice Complainant is referring to. Subject to and without waiving said objection, the Company responds that it has no "red" disconnection notices, but

does use pink disconnection notices, and attaches the document marked **Request 13**, which document was also attached to the Company's Answer to Complainant's Complaint as Exhibit D.

14. A list of exceptions involving the Cold Weather [sic] Rule.

OBJECTION AND RESPONSE to Request 14:

Ameren Missouri objects to Request 14 to because it is vague and ambiguous, and to the extent it does not seek production of any designated document or thing within the Company's possession, custody or control but instead calls instead for the Company to compile a list, presumably of regulations, on Complainant's behalf. Further, any such regulations to be included in such a list are not within the exclusive possession, custody or control of the Company and are equally available to Complainant such that he may compile his own list. Subject to and without waiving said objection, the Company responds as an aid to Complainant that he may access all regulations regarding the Cold Weather Rule, 4 CSR 240-13.055, via the internet at <http://www.sos.mo.gov/adrules/csr/current/4csr/4c240-13.pdf>.

15. A list of exceptions involving the Hot Whether [sic] Rule.

OBJECTION AND RESPONSE to Request 15:

Ameren Missouri objects to Request 15 because it is vague and ambiguous, and to the extent it does not seek production of any designated document or thing within the Company's possession, custody or control but instead calls instead for the Company to compile a list, presumably of regulations or statutes, on Complainant's behalf. Further, any such regulations or statutes to be included in such a list are not within the exclusive possession, custody or control of the Company and are equally available to Complainant such that he may compile his own list. Subject to and without waiving said objection, the Company responds that there are no regulations for the Hot Weather Rule, but as an aid to Complainant notes that he may access the applicable statute, §393.108 RSMo via the internet at <http://www.moga.mo.gov>.

16. A list of procedures the company uses to assist customers who have huge utility bills.

OBJECTION AND RESPONSE to Request 16:

Ameren Missouri object to Request 16 because it does not seek production of any designated document or thing within the Company's possession, custody or control but instead calls for the Company to compile a list, and because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objection, as an aid to Complainant the Company notes that information about various assistance programs that the Company administers or participates in is available to Complainant via the internet at

<http://www.ameren.com/sites/AUE/csc/Pages/PaymentsAndAssistance.aspx>.

17. A list of the reasons why if there is an outage the company is unsure if they can assist those with disabilities to be restored immediately.

OBJECTION to Request 17:

Ameren Missouri object to Request 17 because it does not seek production of any designated document or thing within the Company's possession, custody or control, and because it seeks information that is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

18. A list of reasons why the administration is not involved in the due process system and why they will not take any action.

OBJECTION to Request 18:

Ameren Missouri objects to Request 18 because it is vague and ambiguous, objects to the extent the request assumes that Company administration is uninvolved or does not take action, objects because the request does not seek production of any designated document or thing within the Company's possession, custody or control, because it seeks information that is irrelevant and because it is not reasonably calculated to lead to the discovery of admissible evidence.

19. A list of the reasons why utility does not assist those with disabilities and the indigent in paying their utility bills.

OBJECTION AND RESPONSE to Request 19:

Ameren Missouri objects to Request 19 to the extent it assumes the Company does not assist those with disabilities or the indigent, and objects because the request does not seek production of any designated document or thing within the Company's possession, custody or control, and seeks information that is irrelevant and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objections, see Response to Request 16.

20. A list of the reasons why the utility company charges people with disabilities, the indigent and the elderly with high utility bills.

OBJECTION AND RESPONSE to Request 20:

Ameren Missouri objects to Request 20 to the extent it implies that the Company charges people with disabilities, the indigent and the elderly a rate for residential electric service that is different than it charges other residential customers, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control. Subject to and without waiving said objections, as an aid to Complainant the Company responds that the tariff regarding its residential electric service rate and the description of the service for which this rate is applied can be accessed via the internet at <http://www.ameren.com/sites/AUE/Rates/Documents/UECSheet54Rate1MRES.pdf>

21. A list of steps the company plans to take in improving Customer Service Department.

OBJECTION to Request 21:

Ameren Missouri objects to Request 21 to the extent it implies that the Company needs to improve its Customer Service Center, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control and that it seeks information that, to the extent it may exist, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

22. A list of steps the company plans to take in improving relationships between the African-American community.

OBJECTION to Request 22:

Ameren Missouri objects to Request 22 to the extent it implies that the Company needs to improve relationships between the Company and the African-American community, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control and that it seeks information that, even if it existed, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

23. A list of steps the company plans to take in improving relationships among the elderly.

OBJECTION to Request 23:

Ameren Missouri objects to Request 23 to the extent it implies that the Company needs to improve relationships between the Company and the elderly, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control and that it seeks information that, even if it existed, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

24. A list of steps the company plans to take in improving relationships among the indigent.

OBJECTION to Request 24:

Ameren Missouri objects to Request 24 to the extent it implies that the Company needs to improve relationships between the Company and the indigent, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control and that it seeks information that, even if it existed, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

25. A list of steps the company plans to take in improving relationships among people with disabilities.

OBJECTION to Request 25:

Ameren Missouri objects to Request 25 to the extent it implies that the Company needs to improve relationships between the Company and people with disabilities, and objects that the request does not seek production of any designated document or thing within the Company's possession, custody or control and that it seeks information that, even if it existed, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

26. A list of steps the company plans to take to improve relationships among the community.

OBJECTION to Request 26:

Ameren Missouri objects to Request 26 because it is vague and ambiguous with respect to the what “the community” means, and objects to the extent it implies that the Company needs to improve relationships between the Company and the community, and objects that the request does not seek production of any designated document or thing within the Company’s possession, custody or control and that it seeks information that, even if it existed, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

27.

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

Attorney for Ameren Missouri

By: /s/ Wendy K. Tatro

Wendy K. Tatro, # 60261
Corporate Counsel
Ameren Services Company
P.O. Box 66149
St. Louis, MO 63166-6149
(314) 554-3484 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Ameren Missouri's Objections And Responses To Complainant's First Set Of Documents For A Motion To Produce ("Request For Production Of Documents") were served on Complainant Craig Mershon via electronic mail (e-mail) and via regular mail this 14th day of February, 2014.

Craig Mershon
11931 El Sabado Drive
St. Louis, MO 63138
craigmershon@aol.com

/s/ Sarah E. Giboney
Sarah E. Giboney