

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Permission and)	
Approval and a Certificate of Public)	
Convenience and Necessity Authorizing)	
it to Construct, Install, Own,)	File No. EA-2012-0281
Operate, Maintain, and Otherwise Control and Manage)	
A Utility Waste Landfill and Related Facilities at its)	
Labadie Energy Center.)	

**AMEREN MISSOURI’S RESPONSE TO INTERVENORS’
MOTION FOR LEAVE TO SUBMIT DATA REQUEST**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Response to Intervenor’s’ above-referenced Motion states as follows:

1. Intervenor’s correctly point out that under the original, agreed-upon procedural schedule adopted by the Commission, a cut-off date for serving data requests, subpoena’s, etc. existed. Intervenor’s have essentially asked for a waiver of that date with respect to their proposed data request, which seeks groundwater monitoring data addressed in Ameren Missouri’s surrebuttal testimony. Ameren Missouri does not object to Intervenor’s’ request for leave to serve the subject data request.

2. Ameren Missouri would point out that had Intervenor’s contacted the undersigned counsel to see if the undersigned counsel would consent to service of the data request (or consent to Intervenor’s’ request for leave to serve it) consent would have been given.

3. Ameren Missouri also notes that it has requested to depose Intervenor’s’ witness Charles Norris and requested that he be produced without the necessity of serving him with a subpoena. Counsel for Intervenor’s has indicated she will produce him without the necessity of

Ameren Missouri obtaining and serving a subpoena. Consequently, Ameren Missouri assumes that leave of the Commission is not needed given that issuance of a subpoena is not necessary.

Respectfully submitted,

/s/ James B. Lowery

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ATTORNEYS FOR

UNION ELECTRIC COMPANY

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served via e-mail to the following on October 4, 2013:

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/s/ James B. Lowery
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