

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 2nd Filing to Implement)
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

File No. EO-2015-0055

RESPONSE TO MOTIONS FOR PROTECTIVE ORDERS

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and in response to the motion filed by the Office of the Public Counsel, *Public Counsel's Motion for Protective Order and Motion for Expedited Treatment*, and by Earth Island Institute d/b/a Renew Missouri, *Renew Missouri's Motion for Protective Order and Motion for Expedited Treatment*, states:

1. On July 13, 2015, the Office of the Public Counsel ("OPC") and Earth Island Institute d/b/a Renew Missouri ("Renew Missouri") filed separate motions for protective orders. They claim that Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") wishes to depose their witnesses in a way that would cause annoyance, embarrassment, oppression, undue burden or expense in violation of The Missouri Rules of Civil Procedure. The movants also request expedited treatment due to the hearing in this matter being scheduled to begin on July 20.

2. Staff concurs in the reasoning of the motions filed by OPC and Renew Missouri and finds no benefit in deposing either Mr. PJ Wilson or taking a second deposition of Dr. Geoff Marke and does not intend to make any inquiries at the depositions should they take place.

WHEREFORE, Staff prays the Commission accept its response to the motions of Public Counsel and Renew Missouri.

Respectfully submitted,

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 15th day of July, 2015, to all counsel of record.

/s/ Whitney Payne