

## Missouri Public Service Commission

### Data Request

<b>Data Request No.</b>	0446
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	10/18/2019
<b>Issue</b>	Expense - Miscellaneous A&G Expense
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Board of Directors Invoices

<b>Description</b>	For each and every Ameren and Ameren Missouri Board of Directors' meetings that were held during the test year ending December 31, 2018. 1) Please provide a complete copy of all invoices from all hotels and destinations that were used for Ameren and Ameren Missouri Board of Directors Meetings. 2) Please provide a complete copy of all invoices from all charter flight services/companies used during the test year ending December 31, 2018. 3) Please provide a complete copy of all invoices from commercial airlines used for travel for Ameren and Ameren Missouri Board of Directors' Meetings during the test year ending December 31, 2018. 4) Please provide a complete copy of all invoices for all food and beverage purchases made for Ameren and Ameren Missouri Board of Directors Meetings. DR requested by Jason Kunst, Jason.kunst@psc.mo.gov
<b>Due Date</b>	11/7/2019

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<b>Security</b>	Public
<b>Rationale</b>	NA

**Missouri Public Service Commission**

**Data Request**

**Data Request No.** 0445  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/18/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** True-up issues

**Description** Please refer to pages 13 and 14 of the Commission's ORDER SETTING TEST YEAR AND ADOPTING PROCEDURAL SCHEDULE for Ameren Missouri Case No. ER-2019-0335. Please list and describe all true-up issues that Ameren Missouri is currently aware of and is evaluating as a proposed true-up adjustment that is not specifically stated on page 13 or 14 and that would pertain to "...other significant items that must be considered in order to maintain a proper relationship of revenues, expenses and rate base." Staff is requesting this information in order to have adequate time to evaluate any unspecified true-up issues that Ameren Missouri may now be aware of. Please update the response to this data request for any changes through January 1, 2020. DR requested by John Cassidy, (john.cassidy@psc.mo.gov)

**Due Date** 11/7/2019

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**Security** Public  
**Rationale** NA

**Missouri Public Service Commission**

**Data Request**

**Data Request No.** 0444  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/18/2019  
**Issue** Expense - Payroll-Incentive Compensation  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Incentive Compensation

**Description** Reference LMM-WP-287. Please describe the circumstances leading to the payment made at AMS in April 2018 for AMIP. Please identify the amount of the payment and describe how the cost was allocated to Ameren's business units. Matthew Young (matthew.young@psc.mo.gov)  
**Due Date** 11/7/2019

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**Security** Public  
**Rationale** NA

**Missouri Public Service Commission****Data Request**

**Data Request No.** 0443  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/18/2019  
**Issue** Expense - Payroll-Incentive Compensation  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** LT Incentive Compensation Capitalized

**Description** For the Calendar years 2017, 2018, and 2019 to date, please provide all Long-Term incentive compensation amounts recorded by FERC account. For the above items, please specify 1) the category (e.g. UEC PSU, RSU or AMS PSU, RSU); 2) Entry type (e.g. accrual, actual, accrual reversal (with description of reversal), other adjustments (with description of adjustment); and 3) Incentive Compensation Plan year that the amounts pertain to (e.g. 2016 – 2019). Matthew Young (matthew.young@psc.mo.gov)

**Due Date** 11/7/2019

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**Security** Public  
**Rationale** NA

**Missouri Public Service Commission****Data Request**

**Data Request No.** 0437  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/17/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Ameren Missouri settlement with Sierra Club

**Description** Please refer to Ameren Missouri's response to Staff Data Request No. 390 in Case No. ER-2016-0179. 1. Please explain the ratemaking treatment that Ameren Missouri proposes to address the \$2 million recent settlement with the Sierra Club regarding Ameren Missouri's alleged violations of the Clean Air Act, regarding "...at least \$1 million to provide electric buses and charging stations for St. Louis public transit" and the remainder of the settlement likely going towards community solar projects over the next two years. Indicate if Ameren Missouri recorded these expenses and/or investments above the line or below the line and list and explain all rationale for this decision. 2. Indicate if there have been any modifications to the settlement agreement or if any amendments have been added to the settlement agreement that was provided in response to Staff DR 390 in Case No. ER-2016-0179. If yes, provide all new or modified agreements. 3. Please explain what community solar project (or any other project) the funds were used for and provide all rationale. Provide a narrative timeline of all events as well as a description for the project(s) and how Ameren Missouri participated. 4. With regard to the investment in electric buses and charging stations for St. Louis public transit, please explain what electric buses and charging stations Ameren Missouri's funds were used for and provide all rationale. Provide a narrative timeline of all events as well as a description for the project(s) and how Ameren Missouri participated. 5. Provide all journal entries on a separate basis, by date, by amount, by FERC account that Ameren Missouri used to record the settlement payments and all investments related to the settlement. 6. Provide employee names, job titles and employing entity for all persons that were responsible for the decision to provide settlement funds as described above. DR requested by John Cassidy (john.cassidy@psc.mo.gov).

**Due Date** 11/6/2019

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## Missouri Public Service Commission

### Data Request

<b>Data Request No.</b>	0435
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	10/17/2019
<b>Issue</b>	Expense - Miscellaneous A&G Expense
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Employee Relocation Costs

<b>Description</b>	Please refer to Ameren Missouri's response to Staff Data Request No. 323 in Case No. ER-2019-0335. 1. Provide a complete copy of relocation policies applicable to Ameren Missouri and Ameren Services Company that are specific to "New professional," "Experienced professional," "Ameren leadership team," "Ameren executive leadership team," and all other policy classifications that exist. Also provide all employee relocation expense limits per employee, if such a limit does exist. Also provide all updated policies through December 31, 2019 if there are any changes to the policies that have occurred since January 2019. 2. Please provide a list of reasons and a detailed explanation for why the level of employee relocation expense during the test year is much higher than in prior years. DR requested by Paul Amenthor (Paul.Amenthor@psc.mo.gov).
<b>Due Date</b>	11/6/2019

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<b>Security</b>	Public
<b>Rationale</b>	NA

**Missouri Public Service Commission****Data Request**

**Data Request No.** 0434  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/17/2019  
**Issue** Expense - Miscellaneous A&G Expense  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Employee Relocation Costs

**Description** Please refer to Ameren Missouri's response to Staff Data Request No. 323 in Case No. ER-2019-0335. 1. Please provide the employee names and job titles for the Ameren Services Company employees listed in the file labeled "mpsc 0323 attach – allocations conf.xlsx" relocation expense. 2. For Ameren Missouri electric, for the period covering January 1, 2014 through December 31, 2019, please provide a complete listing of each Ameren Missouri employee, by employee name and job title, for which Ameren Missouri incurred employee relocation cost. For each employee, provide employee relocation expense, by date, by amount, by FERC account. Please provide the Ameren Missouri electric employees in the same format as AMS was provided in the file labeled "mpsc 0323 attach – allocations conf.xlsx" (with employee names and job titles). 3. For each separate AMS employee listed during the period covering January 1, 2018 through December 31, 2019 for which relocation cost was incurred, please provide the reasons and business need for the relocation. Also provide the prior work location and the current work location. 4. For each separate Ameren Missouri employee listed during the period covering January 1, 2018 through December 31, 2019 for which relocation cost was incurred, please provide the reasons and business need for the relocation. Also provide the employee's prior work location and current work location. DR requested by Paul Amenthor (Paul.Amenthor@psc.mo.gov).

**Due Date** 11/6/2019

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**Missouri Public Service Commission****Data Request**

**Data Request No.** 0432  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/16/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Retired Plant in Service

**Description** 1. Please describe the process utilized by Ameren Missouri to move facilities and land that are no longer in service to non-utility property or property held for future use. 2. What steps does Ameren Missouri take to ensure that facilities and land that are no longer in use are being moved to non-utility property/property held for future use in a timely manner? Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)

**Due Date** 11/5/2019

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**Security** Public  
**Rationale** NA



**Missouri Public Service Commission****Data Request**

**Data Request No.** 0297.1  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/16/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** SLU Offer

**Description** Please refer to the appraisal report attached to the response to Staff Data Request No. 297. 1. Please provide a complete copy of the offer to purchase the former central substation site made by St. Louis University referenced on page 2 of the appraisal report. 2. Please provide a complete copy of all communication between Ameren Missouri and St. Louis University regarding the purchase offer and the planned donation of the property. 3. Did Ameren Missouri receive any other offers for the property? If yes, please provide a complete copy of the offers and all communication between Ameren Missouri and the interested parties. 4. Please provide the business reason and rationale for choosing to donate the property rather than sell the property to St. Louis University. 5. Please identify the individual(s) who made the decision to not accept or counter the St. Louis University offer to purchase the property. Please provide the name, title, and employing entity. Requested by Jason Kunst (Jason.Kunst@psc.mo.gov)

**Due Date** 11/5/2019

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**Security** Public  
**Rationale** NA

**Missouri Public Service Commission****Data Request**

**Data Request No.** 0175.1  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/18/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Follow Up to Ameren Missouri Litigation related to Department of Energy (DOE) Spent Fuel Storage

**Description**

1. Please describe the procedure as to how Ameren Missouri requests reimbursement for spent nuclear fuel costs and how those requests are processed and received from the US Department of Energy. 2. Provide a copy of all policies and procedures that govern the spent nuclear fuel reimbursement process. 3. For each reimbursement that Ameren Missouri has received since the reimbursements first began through December 31, 2019, please provide the amount of reimbursement claimed by Ameren Missouri and also the amount approved and received from the US Department of Energy. Please quantify and explain/provide rationale for each discrepancy between the amounts claimed versus the amounts received for each reimbursement. 4. Please provide any documentation that Ameren Missouri received, since reimbursement began, from the U.S. DOE regarding any discrepancies between amounts claimed and received for spent nuclear fuel reimbursement. 5. Does Ameren Missouri have the ability and does Ameren Missouri intend to extend the settlement agreement with the U.S. DOE subsequent to the current addendum's expiration on December 31, 2019? If Ameren Missouri intends on extending the agreement, when does the company believe it will do so? If an addendum is executed prior to December 31, 2019, please provide a complete copy of the addendum. 6. Please quantify the total remaining amount of reimbursement that Ameren Missouri is eligible to receive from the U.S. DOE for nuclear spent fuel costs. If the eligible reimbursement amount is not certain, please explain. 7. Once Ameren Missouri has exhausted its spent nuclear fuel reimbursement amounts, will the U.S. DOE reimburse Ameren Missouri for future costs associated with high level nuclear fuel waste disposal methods? 8. Have all capital costs/projects related to spent nuclear fuel been incurred/constructed and offset by reimbursement? Please explain in detail. DR Requested by Lisa Ferguson, lisa.ferguson@psc.mo.gov

**Due Date** 11/7/2019

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**Missouri Public Service Commission****Data Request**

**Data Request No.** 0358  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 9/27/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Maintenance Cost Savings Resulting From Improvements Made During power plant outages

**Description**

1. Please provide by plant, by month the non-fuel operations & maintenance savings for all major boiler outages as well as during less lengthy outages that occurred during the period covering January 1, 2017 through December 31, 2019 updated when available, if any. 2. For each of the items listed in item one above, please provide the following: A. : separately on a non-labor and labor basis, by FERC account, the amount of each type of ongoing cost savings to be realized on an annual basis as a result of these outages. B. Also provide the starting date for when any such maintenance cost savings first began. 3. Please list each classification of outages for each of Ameren Missouri's coal generating units. For classification of outage listed please define the outage classification, the normal duration of each classification of outage and what types of work typically takes places during each classification of outage and how the determination is made regarding whether the outage is a major boiler outage, or some other classification. Also indicate if length of outage is part of the determination of the classification of the outage. 4. For item 3 above provide a copy of all Ameren Missouri policies and procedures and all other supporting documentation that employees rely upon to determine the classification of an outage as listed, defined and explained in item 3 above. Requested by Lisa Ferguson, lisa.ferguson@psc.mo.gov

**Due Date** 10/17/2019

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WILLIAM JAY POWELL  
JOHN L. ROARK  
COLLY J. DURLEY  
JAMES B. LOWERY  
MICHAEL R. TRIPP  
PHEBE LA MAR  
SARAH E. GIBONEY  
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BETHANY R. FINDLEY  
MATTHEW R. QUETSCH  
JACKIE L. RODGERS, JR.  
JOHN N. ROARK, JR.

ROBERT C. SMITH (1923-2016)  
RAYMOND C. LEWIS, JR. (1926-2004)

LEGAL NURSE CONSULTANT  
JENNY BECKETT, RN

October 7, 2019

Mr. Jeff Keevil  
Deputy Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: File No. ER-2019-0335 – Staff DR Nos. 333 -363

Dear Jeff:

The Company objects to DR No. 334 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome. Subject to the foregoing objection, a response will be provided which will indicate that any case affecting Ameren Missouri relating to Entergy is final and unappealable and further providing that the ongoing amortization will be completed prior to the operation of law date in this case.

The Company objects to DR No. 336 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome and further seeks publicly available information equally accessible by the Staff. Subject to the foregoing objection, a response will be provided answering subparts 1 -3 as to ROE cases which impact Ameren Missouri (see prior objection regarding any response regarding the Entergy case) and responses to subparts 5 through 9 will be provided as to those same cases.

The Company objects to DR No. 337 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome and further is beyond the scope of proper discovery in seeking analyses that have not been performed instead of seeking existing facts, documents, or information. The Company also objects to extent it seeks publicly available information equally accessible by the Staff. Subject to the foregoing, a response will be provided.

The Company objects to subpart 1 of DR No. 344 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is overbroad and unduly burdensome in seeking “all other changing factors”. Subject to the foregoing objection, a response will be provided.

Mr. Jeff Keevil  
October 7, 2019  
Page 2

The Company objects to DR No. 352 because it is not relevant, not reasonably calculated to lead to the discovery of admissible evidence, and is overbroad, unduly burdensome and oppressive in seeking a “detailed list” of “all factors or changes” over a three-year period for the very large number of MISO costs incurred by Ameren Missouri as a participant in MISO and its energy and ancillary services markets. The Company also objects on the grounds that it is overbroad, unduly burdensome, oppressive and beyond the scope of discovery to the extent it seeks to require the Company to perform analyses that have not been performed. Subject to the foregoing objections, the Company will attempt to provide a response similar to the response provided for DR No. 348 in File No. ER-2016-0179.

The Company objects to subpart 1 of DR No. 358 and its use of the term “less lengthy outages” because the phrase is vague, seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and is overly broad and unduly burdensome. A response to subpart 1 will be provided as to major boiler outages. The Company objects to subpart 2 of DR No. 358 because it is overly broad and unduly burdensome and objects to the extent it seeks to require the Company to conduct or prepare analyses that do not exist instead of seeking the discovery of existing facts, documents or information and to such extent it is beyond the scope of discovery.

Given the scope and details requested and the number of individual items that are the subject of the large number of requests received on a single day (a great many of which have a large number of subparts) the Company will require an additional two weeks, to October 31, 2019, to respond to this set of DRs, although it will endeavor to respond to as many as reasonably possible before then.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

Cc: Geri Best, Carolyn Mora, Yvette Scott, Wendy Tatro

**Missouri Public Service Commission****Data Request**

<b>Data Request No.</b>	0377
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	10/1/2019
<b>Issue</b>	Expense - A&G - Legal Fees
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	External Legal Fees for Clean Air Act Violations

<b>Description</b>	<p>Pertaining to the United States of America, acting at the request of the Administrator of the United States Environmental Protection Agency (US EPA) vs Ameren Missouri d/b/a Union Electric – Clean Air Act (CAA) Violations at Rush Island legal matters: 1. Please provide a narrative timeline of events from the time that Ameren Missouri learned of the violations to present. Update this timeline of events through December 31, 2019. 2. Please list each external law firm that was used to defend Ameren Missouri for the CAA violations case(s) from 2011 to present. Also describe the process for how each law firm was selected. 3. Indicate all other law firms that were considered but not selected. 4. Please describe the nature of the assistance that was provided by each of the listed law firms in item one above. Also, list and explain all reasons for why Ameren Missouri required such law firms to process the US EPA CAA violations lawsuit(s). 5. Please quantify all charges by each law firm, by FERC account, that were incurred by Ameren Missouri electric pertaining only to the CAA violations / legal matters for Rush Island, separately, by each law firm listed in item one above for each of the following 12 month ending periods ending: December 31, 2011, December 31, 2012, December 31, 2013, December 31, 2014, December 31, 2015, December 31, 2016, December 31, 2017, December 31, 2018 and December 31, 2019 when available. 6. For the period covering January 1, 2014 through December 31, 2019 provide a complete copy of all invoices received from each law firm listed in item one above that provide amounts charged, hours billed by hourly rate, description and details of all goods and services provided and that were charged to Ameren Missouri electric for the CAA violations at Rush Island. 7. For item 1 above, provide a complete copy of all engagement letters that were executed with each law firm. Requested by Christopher Caldwell, Christopher.Caldwell@psc.mo.gov</p>
<b>Due Date</b>	10/21/2019

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-2019-0335 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

**Missouri Public Service Commission****Data Request**

**Data Request No.** 0374  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 10/1/2019  
**Issue** Expense - A&G - Outside Services  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Outside Services Expense incurred for matters pertaining to Clean Air Act Violations at Rush Island

**Description** Pertaining to the United States of America, acting at the request of the Administrator of the United States Environmental Protection Agency (US EPA) vs Ameren Missouri (d/b/a Union Electric Company) – Clean Air Act (CAA) Violations at Rush Island legal matters: 1. Please list each external consultant that was hired to assist Ameren Missouri with matters pertaining to the CAA violations from 2011 to present. Also describe the process for how each consultant was evaluated and selected. 2. Indicate all other consultants that were considered but not selected. 3. Please describe the nature of the assistance that was provided by each of the listed consultants in item one above. Also, list and explain all reasons for why Ameren Missouri required such consultants to process all CAA violations lawsuit(s). 4. Please quantify the consultant fees, by FERC account, that were incurred by Ameren Missouri or allocated to Ameren Missouri electric pertaining only to the clean air violation, separately, by each consultant listed in item one above for each of the following 12 month ending periods ending: December 31, 2011, December 31, 2012, December 31, 2013, December 31, 2014, December 31, 2015, December 31, 2016, December 31, 2017, December 31, 2018 and December 31, 2019 when available. 5. For the period covering January 1, 2014 through December 31, 2019 provide a complete copy of all invoices received from each consultant listed in item one above that provide amounts charged, hours billed by hourly rate, description and details of all goods and services provided and that were charged to Ameren Missouri electric for the clean air violation. 6. For item 1 above, provide a complete copy of all engagement letters that were executed with each consultant. Requested by Christopher Caldwell, Christopher.Caldwell@psc.mo.gov

**Due Date** 10/21/2019

The attached information provided to Missouri Public Service Commission Staff in response to the above data information request is accurate and complete, and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform the Missouri Public Service Commission Staff if, during the pendency of Case No. ER-2019-0335 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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LEGAL NURSE CONSULTANT  
JENNY BECKETT, RN

October 11, 2019

Mr. Jeff Keevil  
Deputy Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, MO 65102

Re: File No. ER-2019-0335 – Staff DR Nos. 374-377

Dear Jeff:

While the Company will provide responses to all four of these DRS, it does object (although privilege is not waived unless the information is produced) to these DRs to the extent they seek information protected by the attorney-client privilege, the work product privilege, or both. Subject to those objections, responses will be provided.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

Cc: Geri Best, Carolyn Mora, Yvette Scott, Wendy Tatro