

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

In the Matter of the Union Electric Company d/b/a)
Ameren Missouri's Tariffs to Decrease Its) File No. ER-2019-0335
Revenues for Electric Service)

PUBLIC COUNSEL DATA REQUESTS NO. 1000 – 1018.2

The Office of Public Counsel (OPC) hereby presents the following Data Requests to Union Electric d/b/a Ameren Missouri (Ameren Missouri and UEC). Please provide electronic responses to the following: opcservice@opc.mo.gov and caleb.hall@opc.mo.gov. The data requests are continuing in nature and require supplemental responses as soon as further or different information is obtained that is responsive to them.

DEFINITIONS

1. "The Company" or "company" means: Union Electric d/b/a Ameren Missouri ("Union Electric and UEC"), its subsidiaries and affiliates, past or present; its employees, officers, directors, agents, consultants, attorneys, and all persons acting under contractual arrangements with or acting on behalf of Union Electric; any merged or consolidated predecessors or predecessor in interest; and any merged or consolidated successors or successor in interest.
2. "Document" should be interpreted to include, but not be limited to, the original or any copy, of any kind, any, exhibit, pleading, transcript, calendar, cancelled check, photograph, form, memo, ledger, tax return, report, record, order or notice of the Commission or other governmental action of any kind, study (including engineering, feasibility, general economic, and market studies), survey, summaries, comparisons, calculations, handwritten note, minutes, logs, graphs, indices, computer files, computer inputs and outputs, internal operating manuals, data sheets, recordings, electronic mail or text messages and attachments, or any other written, or retrievable matter or data of any kind.
3. Any document that is not exactly identical to another document for any reason, including, but not limited to, marginal notations or deletions, should be considered to be a separate document.

4. Please provide data responses as they become available.
5. Consider each data request is continuing in nature and requires a supplemental response as soon as further or different information is obtained that is responsive to the request.

DATA REQUEST

1000. Please provide copies of all the documentation related to UEC's decision to file this case versus maintaining its current rates.
1002. Does Ameren Missouri have any company specific policies and procedures?
 - 1002.1 If yes, please provide a copy all Ameren Missouri specific policies and procedures effective for the period January 1, 2018 through December 31, 2019.
1003. Will the current rate case change the amount of money UEC will charge its Missouri retail customers through its Fuel Adjustment Clause (FAC)?
 - 1003.1 If yes, has UEC studied the FAC revenue impact this rate case will have on UEC customers versus the revenue impact from maintenance of current rates?
1004. Please provide copies of all documentation related to UEC's examination and approval of the FAC changes in this rate case.
 - 1004.1 If no, why was the impact of this case on the Ameren UE FAC not studied or approved separately?
1005. Is it UEC's position that the proposed FAC base costs components are the best estimation of future and expected revenues and costs results impacting the Company's FAC recovery?
 - 1005.1 If yes, please provide any documentation supporting the Company's response.
1006. Does the proposed FAC base costs components match Ameren Missouri's budget for 2020 and beyond?
 - 1006.1 If yes, please provide copies of budgeted material used to establish the proposed FAC base costs.
 - 1006.2 If no, please provide a copy of the non-budget material used to establish each component of the proposed FAC base costs?
1007. Has UEC performed any study to examine the probability that the proposed FAC base in this case will be equal to, less than, or greater than future FAC costs?
 - 1007.1 If yes, please provide a copy of the study and its results.

- 1007.2 If no, what was the reason(s) such an analysis was not needed to develop the proposed FAC base in this case?
1008. Will Ameren Missouri customers continue to receive the Tax Cut Jobs Act (TCJA) credit on their bills at the time new rates go into effect from this case?
- 1008.1 If the answer is no, state with specificity the annual amount of these credits that will be removed from customer bills?
1009. **** Did UEC make a pro forma adjustment for Tax Law Rate Change reducing Test Year revenues by \$115,711,166? ** CONFIDENTIAL**
- 1009.1 **** If yes, why would the removal of a bill credit reduce UEC revenue? ** CONFIDENTIAL**
- 1009.2 **** Wouldn't a removal of a bill credit increase UEC's revenues? ** CONFIDENTIAL**
1010. What is the 2020 and 2021 revenue impact on Ameren Missouri if the tariffs filed in this case are approved as filed?
1011. What is the Ameren Missouri revenue impact included in Ameren Missouri's 2020 & 2021 budget related to this rate case?
1012. Provide the Ameren Missouri 2020-2024 Business Plan immediately when it becomes available.
1013. Please highlight and provide copies of any variance identification and explanation or modification to the Ameren Missouri 2019-2020 Business Plan?
1014. Is it Ameren Missouri's position that its update and true-up case position can and will result in elimination of a reduction of the requested rate decrease in this case and can or will result in a rate increase to current rates? If no, please identify and describe the impacts of the Company's update and true-up information can have on its initial filed positions.

AFFILIATE TRANSACTION/CAPITAL STRUCTURE

1015. In the January 1, 2018 thru December 31, 2019 period will UEC's treasury function be completely under the control of UEC employees only.
- 1015.1 If no, which affiliate employee positions are performing exactly which specific treasury functions on UEC's behalf?
- 1015.2 What UEC employees perform what specific treasury functions on UEC's behalf?
1016. Does UEC have any specific treasury function policies and procedures?
- 1016.1 If yes, please provide copies of all such policies and procedures in effect during the period January 1, 2018 through December 31, 2019.

1017. What is the organization structure of the functions (e.g. executive, treasury, accounting, legal, etc.) performed by AMS?

1017.1 Which employee positions do not charge costs to UEC?

1018. Please provide the AMS, UEC, and AIC employee organization charts for the period January 1, 2018 through December 31, 2019.

1018.1 If no charts exist, please provide narrative descriptions of the organization as to how it produces goods and services for UEC and AIC and does not duplicate any work performed by UEC and AIC employees.

1018.2 If no charts exist, please provide narrative descriptions of the organization as to how it produces goods and services for non-UEC and AIC Ameren entities and do not charge UEC and AIC for any work performed by AMS to operate the Ameren entities other than UEC and AIC.

Submitted by Robert E. Schallenberg, October 25, 2019.

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LEGAL NURSE CONSULTANT
JENNY BECKETT, RN

November 1, 2019

Mr. Caleb Hall
Office of the Public Counsel
P.O. Box 2230
Jefferson City, MO 65102

Re: File No. ER-2019-0335 – OPC DR Nos.

Dear Caleb:

The Company objects to DR No. 1000 because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, is overbroad, unduly burdensome, and seeks materials protected by one or more of the attorney-client, work product, and accountant-client privileges.

The Company objects to DR Nos. 1002 (and 1002.1)¹ on the same bases and because it is vague in that it fails to specify any subject matter for any policies or procedures.

The Company objects to DR Nos. 1004 (and 1004.1) (see footnote 1) because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, is overbroad, unduly burdensome, and seeks materials protected by one or more of the attorney-client, work product, and accountant-client privileges.

The Company objects to DR Nos. 1006 (and 1006.1, .2 (see footnote 1)) because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and it is overly broad and unduly burdensome. Subject to the foregoing objections, a response will be provided.

¹ Please note that the Company will treat DRs with the same numerical value (e.g., 1000, 1000.1) as one DR with multiple subparts. The Company requests that DRs in the future be submitted as such.

Mr. Caleb Hall
November 4, 2019
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The Company objects to DR Nos. 1010, 1011, and 1013 because they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and are overly broad and unduly burdensome. The Company further objects to those DRs to the extent they may improperly seek to require Ameren Missouri to engage in research, to compile data, and to perform analyses rather than seeking the discovery of existing facts or data, which would render them beyond the proper scope of discovery. Subject to the foregoing objections, responses will be provided to DR Nos 1010 and 1013.

The Company objects to DR No. 1014 to the extent it seeks a legal conclusion or seeks information protected by the attorney-client or work product privileges.

With respect to DR No. 3057, the Company is confirming whether its agreements with the providers of these reports allow providing copies with or without protections beyond that provided by the Commission's rules. Assuming it may provide copies without further action, confidential copies will be provided.

Sincerely,

/s/ James B. Lowery

James B. Lowery

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