

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

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

STAFF STATEMENT OF DISCOVERY DISAGREEMENT OR CONCERN

COMES NOW Staff of the Missouri Public Service Commission (“Staff”) and for its Statement of Discovery Disagreement or Concern (“Statement”) states as follows:

1. On August 15, 2019, the Commission issued an Order Setting Test Year and Adopting Procedural Schedule (“Order”). The Order set a Discovery Conference for November 13, 2019.

2. The Order also provided in paragraph 3(K) that Not less than two business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement or concern must attend. If the parties do not identify any discovery disagreements or concerns before the scheduled conference, the presiding officer may cancel the conference.

3. Staff is filing this Statement to identify certain discovery disagreements or concerns regarding Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) responses to certain discovery requests submitted by Staff. For example:

(a) responses to DRs 446, 445, 444, 443, 437, 435, 434, 432, 431, 395, 297.1, and 175.1 are simply overdue or beyond requested extension (see attached DRs, two of which have been designated Confidential);

(b) regarding DR 358 (attached), Ameren Missouri stated in an objection letter (attached) that a response to subpart 1 will be provided as to major boiler outages; however, no response has been received;

(c) regarding DRs 374 and 377 (attached), Ameren Missouri has objected (attached) to the extent these DRs seek information protected by the attorney-client privilege, work product privilege, or both, but indicated it would otherwise respond to the DRs; however, Staff has only received a response to the first two parts of DR 377 and no response at all to DR 374.

WHEREFORE, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference scheduled for November 13, 2019.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Missouri Public Service
Commission

Certificate of Service

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record this 8th day of November, 2019.

/s/ Jeffrey A. Keevil