

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF THE 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'S STATEMENT OF DISCOVERY
DISAGREEMENT OR CONCERN**

COMES NOW, the Office of the Public Counsel (OPC), and provides its Statement of Discovery Disagreement or Concern pursuant to the ordered procedural schedule as follows:

1. Paragraph 3(K) of the Commission's Order Setting Test Year and Adopting Procedural Schedule requires parties to file notices of discovery disagreement or concerns at least two business days before a scheduled discovery conference. The next scheduled discovery conference for this above captioned docket is November 13, 2019.

2. The OPC files this statement regarding certain disagreements or concerns as to Union Electric d/b/a Ameren Missouri's (Ameren Missouri) response and failure to respond to certain discovery requests.

3. Ameren Missouri's response to OPC data request (DR) states that Hyperion Financial Management software (Hyperion) is used for the financial reporting of all of Ameren Corporation's subsidiaries, and that monthly income statements and balance sheets are generated from Hyperion.

4. However, Ameren Missouri's response to OPC DR 3047 states that monthly reports are not generated monthly using Hyperion, and that certain subsidiaries are not accounted for with Hyperion.

5. Several of the OPC's other data requests are also past due.

WHEREFORE, the OPC submits its Statement of Discovery Disagreement or Concern.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Caleb Hall

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**Attorney for the Office of the Public
Counsel**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 8th Day of November, 2019, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall

Ameren Missouri's
Response to OPC Data Request
ER-2019-0335

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its
Revenues for Electric Service.

Data Request No.: OPC 3034

Please identify the software Ameren Corporation uses for purposes of its financial reporting. Does Ameren Corporation use the same financial reporting software for all of its subsidiaries? Does this financial reporting software combine all of Ameren Corporation's subsidiaries financial statements and "rollup" the individual subsidiary financial reporting to produce consolidated reports for Ameren Corporation? How often are the individual subsidiary and consolidated reports produced?

RESPONSE

Prepared By: Paul Blaskiewicz
Title: Manager, Financial Reporting
Date: 9/9/2019

1. Ameren uses Oracle's Hyperion Financial Management (HFM) software.
2. Yes, HFM is used for all subsidiaries.
3. Yes, HFM produces consolidating income statements and balance sheets for Ameren Corporation. The consolidating reports do not provide visibility to intercompany eliminations.
4. Income statements and balance sheets are generated from HFM on a monthly basis. However, incremental reviews and adjustments may be necessary on a quarterly basis to produce quarterly FERC and GAAP reports.

Ameren Missouri's
Response to OPC Data Request
ER-2019-0335

In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its
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Data Request No.: OPC 3047

3047. (Reference response to OPC Data Request No. 3038) For the period January 1, 2018 through most current, please provide the monthly reports generated by the Hyperion Financial Management software for Ameren Corporation and each of the subsidiaries identified on Exhibit 21.1 of Ameren's December 31, 2018, SEC Form 10-K Filing.

RESPONSE

Prepared By: Paul Blaskiewicz
Title: Manager, Financial Reporting
Date: November 7, 2019

Reports are not routinely generated for use from the system on a monthly basis. HFM is a user-based system, with users generating reports needed on demand.

Note, two subsidiaries in Exhibit 21.1 are accounted for as equity method investments, and thus are not included in HFM as separate entities. The two subsidiaries are Fuelco LLC and STARS Alliance, LLC.