

**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 September 19, 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) as of this date, Ameren Missouri has either objected to and refused to answer or provided insufficient responses to data request (DR) numbers 12, 17, and 167-169 (see attached). These DRs are all long past their due date and require at least a further partial response;

(b) as of this date, responses to the following DRs (see attached) are simply overdue – DRs 246-248 (due 9/2/19); DR 258 (due 9/3/19); DRs 260, 262, and 263 (due 9/10/19) (Staff would also note that several responses which were overdue were received on the Friday before the scheduled Discovery Conference);

(c) Staff would note that for each of the past several weeks it has been necessary to send Ameren Missouri a list of responses which are overdue, which has sometimes resulted in receiving responses and sometimes not;

(d) finally, Staff would also note that Ameren Missouri has indicated a reluctance to agree to informal meetings with Staff auditors.

**WHEREFORE**, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference scheduled for September 19, 2019.

Respectfully submitted,

**/s/ Jeffrey A. Keevil**

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: [jeff.keevil@psc.mo.gov](mailto:jeff.keevil@psc.mo.gov)

Attorney for the Staff of the  
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 16th day of September, 2019.

**/s/ Jeffrey A. Keevil**

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

<b>Data Request No.</b>	0012
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	6/21/2019
<b>Issue</b>	General Information & Miscellaneous - Other General Info & Misc.
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Anticipated Continuous Improvements Initiatives

**Description**

1. For the period covering January 1, 2020 through December 31, 2022, please list and describe in detail all anticipated continuous improvement initiatives that will impact Ameren Missouri Electric operations and costs and indicate the start and end dates of each initiative. Update as new information becomes available. 2. For item 1 above list and describe all benefits and improvements that are expected to result for each continuous improvement initiative and quantify all cost savings or additional costs that are expected to occur as a result of each initiative on a separate basis, by month, by FERC account. Update as new information becomes available. 3. For the period covering January 1, 2020 through December 31, 2022, please list and describe in detail all anticipated continuous improvement initiatives that will impact Ameren Services operations and costs (that are allocated to Ameren Missouri Electric in any manner whatsoever) and indicate the start and ending dates for each initiative listed. Update as information becomes available. 4. For item 3 above list and describe all benefits and improvements that are expected to result for each continuous improvement initiative and quantify all cost savings or additional costs that are expected to occur and that will be allocated to Ameren Missouri electric as a result of each initiative on a separate basis, by month, by FERC account. Update as new information becomes available. Data Request submitted by John Cassidy (John.cassidy@psc.mo.gov).

**Due Date** 7/11/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person

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

**Data Request No.** 0017  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 7/8/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Calendars/Itineraries

**Description** 1) For the twelve months ending December 31, 2018, please provide all appointment calendars, appointment books, itineraries, agendas, etc. as maintained by each individual listed below on a daily basis. These items may be kept in paper form, Outlook or other computer program or any other means. Please provide this information for Warner Baxter, Warren Wood, Michael Moehn, Martin Lyons, Tom Byrne, Laura Moore, Gaye Suggett, and any other executive who charged time to work on legislative efforts (SB 564 for example). 2) For all individuals included in the response to part 1 above, please provide all time keeping entries and time sheets separately by month depicting all time charged below the line for lobbying related activities that occurred in the test year ending December 31, 2018. Data Request submitted by John Cassidy (John.cassidy@psc.mo.gov).

**Due Date** 7/28/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

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

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

**Data Request No.** 0167  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 7/15/2019  
**Issue** Rate Base - Plant in Service  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Substation Expansion in Fox Park Neighborhood, St. Louis, Mo

**Description**

1. Please provide all costs recorded on Ameren Missouri's books, by date and by FERC account for the acquisition of the property and structures located at 2806 Magnolia in the Fox Park neighborhood located in St. Louis, Mo. Provide all journal entries by amount and by FERC account used to record the acquisition of this property. 2. Please provide all costs recorded on Ameren Missouri's electric books, by FERC account, by date, by vendor, by category of costs, separately by labor and non-labor, separately by capital and expense, related to the following: (a) obtaining a permit to demolish the home and structures located at 2806 Magnolia; (b) all demolition costs incurred to begin demolition activities of the home and structures located at 2806 Magnolia; (c) all costs incurred to repair neighboring homes and structures that may have been damaged as a result of the demolition activities that occurred at 2806 Magnolia; (d) all costs incurred to clean up, board up and to restore the home, structures and land at 2806 Magnolia subsequent to demolition activity and; (e) all other costs that were incurred for any reason whatsoever in relation to 2806 Magnolia. 3. Please indicate the date when Ameren Missouri donated the property located at 2806 Magnolia to a historic renovation investor or to any other external property. Provide the journal entries used to record this donation of property by date, by amount and by FERC accounts. 4. Please update items 1, 2 and 3 above for all new information through December 31, 2019. 5. Please provide a narrative explanation with a timeline of events with regard to Ameren Missouri's plans for the substation located near 2806 Magnolia from the time of the decision to acquire 2806 Magnolia through December 31, 2019. Update as new information becomes available. DR submitted by John Cassidy (John.cassidy@psc.mo.gov).

**Due Date** 8/4/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make

## Missouri Public Service Commission

### Data Request

<b>Data Request No.</b>	0168
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	7/16/2019
<b>Issue</b>	Expense - Dues and Donations
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Utility Air Regulatory Group (UARG)

<b>Description</b>	1. Please provide a complete copy of all of Ameren's responses to a letter that was received from the Congress of the United States House of Representatives, Committee on Energy and Commerce, dated April 11, 2019, seeking answers to specific questions and specific copies of documents and communication by a due date of April 25, 2019. Provide copies of all return correspondence, answers to questions and a copy of all documentation and communication provided in response to this letter of inquiry. 2. Please indicate if Ameren has made a final decision whether it would stay in Utility Air Regulatory Group (UARG) or decide to leave the UARG. If no decision has been made yet, please provide an update for any final decision reached through December 31, 2019. DR submitted by John Cassidy (John.cassidy@psc.mo.gov).
<b>Due Date</b>	8/5/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

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

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

**Data Request No.** 0169  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 7/16/2019  
**Issue** Expense - Dues and Donations  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Utility Air Regulatory Group (UARG)

**Description** 1. Provide a complete copy of all evaluations of "the net benefits of Utility Air Regulatory Group (UARG) membership" that Ameren, Ameren Services Company, Ameren Missouri or any Ameren affiliate or external consultant has performed for 2017, 2018 and 2019. 2. For Ameren Missouri electric only during the twelve months ending December 31, 2018, please quantify by month, by FERC account all amounts pertaining to UARG. DR submitted by John Cassidy (John.cassidy@psc.mo.gov).

**Due Date** 8/5/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

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

## **Keevil, Jeff**

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**From:** Jim Lowery <Lowery@smithlewis.com>  
**Sent:** Wednesday, June 26, 2019 10:24 AM  
**To:** Keevil, Jeff  
**Cc:** Tatro, Wendy K; Best, Geri A  
**Subject:** File No. ER-2019-0335

Jeff:

While the Company is not conceding that the timeframes in 4 CSR 240-2.090 have been triggered respecting DRs in the upcoming but not yet filed electric rate case, the Company isn't going to make an issue of the 13 requests Staff sent on June 21. Consequently, to the extent time allows without impacting the preparation of the upcoming rate case the Company will begin work on getting the responses together. Please note, however, that the requests have been received when most of the key folks who need to deal with the requests are engaged in putting the putting the rate case filing together and one of those persons is out on medical leave. In light of those considerations, the Company will need until at least July 26 to have responses for all of them, although it will likely be able to answer some of them before then and will provide responses as and when they are ready.

To the extent necessary, the Company is also lodging the following objections:

No. 12: The Company objects to this data request because it neither seeks relevant information nor information that is reasonably calculated to lead to the discovery of admissible evidence, and because it is overbroad and unduly burdensome, in particular given that it seeks information relating to cost of service during a forward period that unless the Staff intends to recommend use of a forward test year will not be used to set rates in the upcoming case.

No. 9: The Company objects to that part of this data request seeking information beyond 2019 because it neither seeks relevant information nor information that is reasonably calculated to lead to the discovery of admissible evidence, and because it is overbroad and unduly burdensome unless the Staff intends to recommend use of a forward test year in the upcoming case.

**Jim Lowery | SMITH LEWIS, LLP**

111 South Ninth Street, Suite 200 | P.O. Box 918 | Columbia, MO 65205-0918  
(ofc) 573-443-3141 | (cell) 573-999-2081 | (fax) 573-442-6686 | [lowery@smithlewis.com](mailto:lowery@smithlewis.com)



WILLIAM JAY POWELL  
JOHN L. ROARK  
COLLY J. DURLEY  
JAMES B. LOWERY  
MICHAEL R. TRIPP  
PHEBE LA MAR  
SARAH E. GIBONEY  
AMANDA ALLEN MILLER  
DANIEL G. BECKETT  
  
OF COUNSEL  
BRUCE H. BECKETT

**SMITH LEWIS, LLP**  
**ATTORNEYS AT LAW**

P.O. BOX 918  
COLUMBIA, MISSOURI 65205-0918  
•••  
CITY CENTRE  
111 SOUTH NINTH STREET, SUITE 200  
COLUMBIA, MISSOURI 65201-4891  
(573) 443-3141 • Fax (573) 442-6686

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

July 18, 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. 13-46

Dear Jeff:

The Company objects to DR No. 17 to the extent it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, or to the extent it invades the privacy of the employee and, while an objection is not necessary to preserve the privilege, notes that it will not provide information reflected in calendars if protected by the attorney-client or work product privileges. Subject to the foregoing, a response will be provided. Given the scope of the request the Company will require up to an additional two weeks (to August 12, 2019) to provide a response.

The Company objects to DR No. 28 because this DR is unduly burdensome and it is overbroad to the extent it seeks information relating to the business, affairs, or operations of affiliates of Ameren Missouri, other than information relating to transactions occurring between Ameren Missouri and its affiliates or goods or services exchanged between Ameren Missouri and its affiliates and, consequently, it is also irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objection and as was done in prior cases, Ameren Missouri will provide the requested list so that Staff can request any specific audit Staff wishes to review but reserves its right to object to the production of any particular audit.

The Company objects to DR No. 31 because this DR is unduly burdensome and it is overbroad to the extent it seeks information relating to the business, affairs, or operations of affiliates of Ameren Missouri, other than information relating to transactions occurring between Ameren Missouri and its affiliates or goods or services exchanged between Ameren Missouri and its affiliates and, consequently, it is also irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objection, if there are existing studies or analysis showing an impact on Ameren Missouri's electric operations or costs in the next 12 months arising from an acquisition by Ameren such study will be provided, and if as a result of a

Mr. Jeff Keevil  
July 18, 2019  
Page 2

possible acquisition a cost has been incurred by Ameren Missouri in the test period it will be identified.

The Company objects to DR No. 36 because it is irrelevant and does not seek information reasonably calculated to lead to the discovery of admissible evidence. The information sought relates to below-the-line expenses that do not affect the Company's rate base or revenue requirement. Subject to the foregoing objection, the Company will provide a printout of payees and amounts in the appropriate FERC account or subaccount for Staff's review, as was done in prior cases.

The Company objects DR No. 37 to the extent it seeks legal memoranda or attorney-client communications which are privileged under the attorney-client or work product privileges. Subject to the foregoing objection, responsive, non-privileged memoranda and correspondence will be provided.

The Company will also require additional time, to August 5, 2019, to respond to DR No. 21.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

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

WILLIAM JAY POWELL  
JOHN L. ROARK  
COLLY J. DURLEY  
JAMES B. LOWERY  
MICHAEL R. TRIPP  
PHEBE LA MAR  
SARAH E. GIBONEY  
AMANDA ALLEN MILLER  
DANIEL G. BECKETT  
  
OF COUNSEL  
BRUCE H. BECKETT

**SMITH LEWIS, LLP**  
**ATTORNEYS AT LAW**

P.O. BOX 918  
COLUMBIA, MISSOURI 65205-0918  
•••  
CITY CENTRE  
111 SOUTH NINTH STREET, SUITE 200  
COLUMBIA, MISSOURI 65201-4891  
(573) 443-3141 • Fax (573) 442-6686

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

July 25, 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. 129 - 167

Dear Jeff:

The Company objects to DR No. 156 because it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad and unduly burdensome. Subject to the foregoing objection, the Company will provide its 2019 budget (which is the only budget that has been adopted) and forecasts for the succeeding four years and any current business plan that exists that covers the current year and that typically covers an additional four-year forecasted period.

The Company objects to DR No. 159's request for information through March 2020 on the grounds that it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad and unduly burdensome. Subject to the foregoing objection, the remainder of the DR will be responded to.

The Company objects to DR No. 165 because it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad and unduly burdensome. Subject to the foregoing objection, a response for substations currently planned for replacement through the budget/forecasted periods used by the Company (through 2023) will be provided.

The Company objects to DR No. 167 because it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad and unduly burdensome. The subject of this DR not reflected in the revenue requirement in this case.

Mr. Jeff Keevil  
July 25, 2019  
Page 2

Given the scope of information and details required, the Company will require up to an additional two weeks, to August approximately 2 weeks, to August 14, 2019, to respond to DR Nos. 140, 141, 160, 163, and 164.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

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

WILLIAM JAY POWELL  
JOHN L. ROARK  
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MICHAEL R. TRIPP  
PHEBE LA MAR  
SARAH E. GIBONEY  
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DANIEL G. BECKETT  
  
OF COUNSEL  
BRUCE H. BECKETT

**SMITH LEWIS, LLP**  
**ATTORNEYS AT LAW**  
  
P.O. BOX 918  
COLUMBIA, MISSOURI 65205-0918  
•••  
CITY CENTRE  
111 SOUTH NINTH STREET, SUITE 200  
COLUMBIA, MISSOURI 65201-4891  
  
(573) 443-3141 • Fax (573) 442-6686

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LEGAL NURSE CONSULTANT  
JENNY BECKETT, RN

July 25, 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. 168-177

Dear Jeff:

The Company objects to DR Nos. 168 and 169 because it is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence; and is overbroad and unduly burdensome. No dollars associated with UARG are in the revenue requirement in this case and Ameren is no longer in UARG.

The Company objects to DR No. 170 to the extent it seeks information protected from disclosure by the attorney-client or work product privileges. Subject to the foregoing objection and consistent with the agreement between the Company's Regulatory Accounting Manager and Mr. Cassidy in the Company's prior rate case on this same DR, a response will be provided to this DR providing updated information similar to that provided in response to DR No. 219 in File No. ER-2014-0258. The Company will also require one additional week (to August 12, 2019) to provide a response.

Sincerely,

*/s/ James B. Lowery*

James B. Lowery

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



Commissioners

RYAN A. SILVEY  
Chairman

WILLIAM P. KENNEY

DANIEL Y. HALL

SCOTT T. RUPP

MAIDA J. COLEMAN

*Missouri Public Service Commission*

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
573-751-3234  
573-751-1847 (Fax Number)  
<http://psc.mo.gov>

SHELLEY BRUEGGEMANN  
General Counsel

MORRIS WOODRUFF  
Secretary

LOYD WILSON  
Director of Administration

NATELLE DIETRICH  
Staff Director

August 1, 2019  
via email

Mr. Jim Lowery  
Smith Lewis, LLP  
P.O. Box 918  
Columbia, MO 65205

RE: Your objections to data requests 9, 12, 156, 167 and 168 in Missouri PSC Case No. ER-2019-0335

Dear Mr. Lowery:

Given Staff's broad discovery powers, especially in a rate case, Staff believes it is entitled to responses to the following data requests to which you have objected on behalf of Ameren Missouri. However, at least on some of them we are willing to work with you to reach a compromise satisfactory to both Staff and Ameren Missouri.

DR 9 Part 3 and DR 12: I would first note that your objection to DR 9 appears to relate only to the 3<sup>rd</sup> part of DR 9. Therefore, we expect to receive responses to parts 1 and 2 since they do not ask for information past the true-up cutoff. As for your objection to DR 9 part 3 and to DR 12 that they relate to a forward time period, Ameren Missouri's prefiled testimony talks about cost reductions ("bending down the cost curve" or words to that effect) to which these questions would be directly relevant insofar as they seek information regarding continuous improvement initiatives which may create cost savings. You may also recall there was an issue in the recent Ameren gas rate case concerning cost savings initiatives.

DR 156: Your objection states that, subject to objection, "the Company will provide its 2019 budget (which is the only budget that has been adopted) and forecasts for the succeeding four years and any current business plan that exists that covers the current year and that typically covers an additional four-year forecasted period." Since you state that only the 2019 budget has been approved, as a compromise, in addition to receiving the material listed in your objection Staff would request the 2020 budget and strategic business plans once they are approved.

DR 167: Your objection states that the subject of this DR is not reflected in the revenue requirement in this case. However, we need verification that it is not in the revenue requirement, such as journal entries and dates, FERC accounts, and amounts for where it was recorded.

DR 168: Similarly to DR 167, your objection states that no dollars associated with UARG are in the revenue requirement in this case; however, we need verification that it is not in the revenue requirement, such as journal entries and dates, FERC accounts, and amounts for where it was recorded. As for our request for a copy of Ameren's responses to the Congress of the United States House of Representatives, Committee on Energy and Commerce, we believe that the Missouri Public Service Commission may have questions concerning this matter given the relatively recent media coverage (particularly in light of some of the Committee's questions about ratepayer funding of contributions to UARG) and we would like to be prepared to address those questions.

After you have had the chance to review the foregoing please let me know if you are willing to respond to the DRs listed above. Thank you.

Sincerely,

**/s/ Jeff Keevil**

Jeff Keevil

WILLIAM JAY POWELL  
JOHN L. ROARK  
COLLY J. DURLEY  
JAMES B. LOWERY  
MICHAEL R. TRIPP  
PHEBE LA MAR  
SARAH E. GIBONEY  
AMANDA ALLEN MILLER  
DANIEL G. BECKETT  
  
OF COUNSEL  
BRUCE H. BECKETT

**SMITH LEWIS, LLP**  
**ATTORNEYS AT LAW**

P.O. BOX 918  
COLUMBIA, MISSOURI 65205-0918  
•••  
CITY CENTRE  
111 SOUTH NINTH STREET, SUITE 200  
COLUMBIA, MISSOURI 65201-4891  
(573) 443-3141 • Fax (573) 442-6686

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

August 2, 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 – Your August 1, 2019 letter

Dear Jeff:

You are correct that the Company will be providing a response to parts 1 and 2 of DR Regarding part 3 of DR No. 9 and DR No. 12, the Company continues to stand by its objection. A general statement about “bending the cost curve” to explain the revenue requirement the Company is requesting in this case (which relies only on historical numbers all of which will be at least 5 months old by the time rates are reset) is a far cry from using a forecasted test year. The requests are not relevant and the Company should not have to undergo the burden of answering them.

The Company agrees with your proposed compromise on DR No. 156.

The Company agrees to provide the information needed to verify that the information sought by DR Nos. 167 and 168 are not in the revenue requirement. As for DR No. 168, the information is simply not relevant to this case.

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>	0246
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	8/13/2019
<b>Issue</b>	General Information & Miscellaneous - Other General Info & Misc.
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Cloud Computing Contract(s)
 <b>Description</b>	 For the Ameren Corporation and Ameren Missouri, Please provide a complete copy of current third party service contract(s) in place for cloud computing. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)
<b>Due Date</b>	9/2/2019

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.

If these data are voluminous, please (1) identify the relevant documents and their location (2) make arrangements with requestor to have documents available for inspection in the Union Electric Company-Investor(Electric) office, or other location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g. book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title number, author, date of publication and publisher, addresses, date written, and the name and address of the person (s) having possession of the document. As used in this data request the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data, recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control or within your knowledge. The pronoun "you" or "your" refers to Union Electric Company-Investor(Electric) and its employees, contractors, agents or others employed by or acting in its behalf.

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

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

**Data Request No.** 0247  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 8/13/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Cloud Computing cost/benefit studies

**Description** 1. Please provide all cost/benefit studies that have been performed by the Ameren Corporation, Ameren Missouri and/or any third party on behalf of Ameren Corporation and Ameren Missouri in the decision to utilize cloud-based solutions. 2. Provide a detailed description of all the benefits provided to the ratepayers and to Ameren Corporation and Ameren Missouri with the utilization of cloud-based solutions. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)

**Due Date** 9/2/2019

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

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

**Data Request No.** 0248  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 8/13/2019  
**Issue** General Information & Miscellaneous - Other General Info & Misc.  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Cloud Computing Costs (capital and expense)

**Description** Provide cloud computing costs broken out by capital and expense, month and FERC account incurred by or allocated to Ameren Missouri for the period of January 1, 2016 thru the most current date available. Please update this response for the update and true up period ordered by the Commission in this case. DR requested by Karen Lyons (Karen.lyons@psc.mo.gov)

**Due Date** 9/2/2019

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

## Missouri Public Service Commission

### Data Request

<b>Data Request No.</b>	0258
<b>Company Name</b>	Union Electric Company-Investor(Electric)
<b>Case/Tracking No.</b>	ER-2019-0335
<b>Date Requested</b>	8/14/2019
<b>Issue</b>	General Information & Miscellaneous - Other General Info & Misc.
<b>Requested From</b>	Geri Best
<b>Requested By</b>	Jeff Keevil
<b>Brief Description</b>	Paperless Billing – Incentives
<b>Description</b>	How does the Company plan to address potential backlash from existing paperless billing customers that are not eligible to receive the \$0.50 bill credit for a one-year period? DR requested by Contessa King (contessa.king@psc.mo.gov).
<b>Due Date</b>	9/3/2019

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

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

**Data Request No.** 0260  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 8/21/2019  
**Issue** Expense - Payroll  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Compensation Surveys

**Description** 1. Please provide a complete copy of each third party compensation survey listed in confidential Table 1 on pages 4 and 5 of the direct testimony of Ameren Missouri witness Kelly S. Hasenfratz. 2. Does Ameren Services and/or Ameren Missouri utilize other supporting information other than the compensation surveys to determine employee pay? If yes, please describe and provide copies of such documentation. 3. Please describe in detail and provide all supporting documentation for Ameren's "benefit philosophy" mentioned on line 15 of page 6 of the direct testimony of Ameren Missouri witness Kelly S. Hasenfratz. 4. Has Ameren Services and/or Ameren Missouri used third party compensation surveys in determining employee compensation and benefit plans in the past? If no, please describe in detail what information was used for this purpose and what date Ameren Services and/or Ameren Missouri started to use third party compensation surveys. 5. Please list the companies/utilities utilized for comparison purposes in the third party compensation surveys. 6. Please provide all supporting documentation and any/all calculations with formulas intact that were used to determine the percentages on page 5, line 8 and page 6, line 14 of the direct testimony of Ameren Missouri witness Kelly S. Hasenfratz. DR requested by Paul Amenthor (Paul.Amenthor@psc.mo.gov).

**Due Date** 9/10/2019

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

**Data Request No.** 0262  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 8/21/2019  
**Issue** Rate Base - Other Rate Base Issues  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** AMI Smart Meter Installations

**Description** 1. Please provide a detailed discussion of Ameren Missouri's plan/strategy to install AMI meters in its service territory as part of its Smart Energy Plan. The discussion should include but not be limited to the total number and dollar amount of AMI meters to be installed, total number and dollar amount of AMI meters that would be kept in inventory (if applicable), timeframes for completion and installation, any labor implications, outside consultants and description of services they provide, proposed depreciation rates, anticipated cost savings by elimination of previous costs or any other means, who manufactures the meters, who provides maintenance for the meters, plans for usage of customer meter data (internally or externally) and any associated ongoing O&M expense related to the AMI meters. 2. Is there a different plan/strategy for AMI meters for electric operations and gas operations? 3. For the period January 1, 2018 through December 31, 2019, updating as available, please provide the total number of AMI smart meters and the associated area in the service territory where they have been installed by month that have been installed. 4. For the period January 1, 2018 through December 31, 2019, as information is available, please provide the amount of investment by month, by FERC account related to AMI smart meters that have been installed by Ameren Missouri.

**Due Date** 9/10/2019

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

**Data Request No.** 0263  
**Company Name** Union Electric Company-Investor(Electric)  
**Case/Tracking No.** ER-2019-0335  
**Date Requested** 8/21/2019  
**Issue** Rate Base - Other Rate Base Issues  
**Requested From** Geri Best  
**Requested By** Jeff Keevil  
**Brief Description** Customer Deposits

**Description** Please provide, by month, customer deposits, separately for electric only and joint, for Ameren Missouri electric operations for the period covering January 1, 2018 through December 31, 2019. Update by month as information becomes available. Jane Dhority (Jane.dhority@psc.mo.gov)  
**Due Date** 9/10/2019

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