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September 3, 2015

Sent via electronic mail

Jim Lowery
Smith Lewis, LLP
111 S. Ninth St.
P.O. Box 918
Columbia, MO 65205-0918

RE: Objections and Request for Additional time to respond to ATXI's First Set of Data Requests to Neighbors United Against Ameren's Power Line received August 24, 2015, corrected August 26, 2015.

Mr. Lowery,

Neighbors United received ATXI's First Set of Data Requests to Neighbors United on August 24, 2015, and your corrected data requests on August 26, 2015. Neighbors United hereby objects and requests additional time as follows:

Data Request 1:

Please provide copies of the Articles of Incorporation of a Nonprofit Corporation and Domestic Nonprofit, the minutes of the organizational meeting required by section 355.111, RSMo., and a list of the directors of the corporation, as contemplated by section 355.111(2), RSMo., of Neighbors United Against Ameren's Power Line ("Neighbors United").

Response: Neighbors United objects to ATXI's request for a copy of the Articles of Incorporation of a Nonprofit Corporation and Domestic Nonprofit as such is equally accessible to ATXI on the Missouri Secretary of State's website.

Without waving any objection, Neighbors United will respond to the data request with information since Neighbors United's date of incorporation, June 17, 2015, and provide ATXI with a copy of the Articles of Incorporation. Neighbors United respectfully requests until September 22, 2015 to respond to Data Request 1. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to the minutes has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 2:

Please identify by name and address each member of Neighbors United and for each such member, state from whom they receive electrical service (or, if they do not receive electrical service, please so state).

Response: Neighbors United objects to ATXI's request for Neighbors United to state for each member of Neighbors United their address if other than the address of the property subject to the proposed line and from whom they receive electrical service as such request asks for information equally accessible to ATXI after receipt of the members' property addresses subject to this case, and the request asks for information not known to Neighbors United, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a general list of electric service providers in each county where the members' property subject to the proposed line resides. In regard to the general list of service providers and the members' names and addresses of the property subject to the proposed line, Neighbors United respectfully requests until September 22, 2015, to respond to this part of the data request. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 3:

Please identify the total number of members of Neighbors United.

Response: Neighbors United does not object to this request but respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 4:

Please identify, by name and address, each member of Neighbors United that claims an ownership or other legal or equitable interest in some portion of the real property that is within the right-of-way of the route of transmission line associated with the Mark Twain Project, as that route is described in Ameren Transmission Company of Illinois' (ATXI) application in EA-2015-0146, along with the property address and parcel numbers (used for tax identification purposes) for each such interest.

Response: Neighbors United objects to ATXI's request for Neighbors United to state for each member of Neighbors United's addresses if other than the address of the property subject to the proposed line and for parcel numbers as such request asks for information equally accessible to ATXI after receipt of the members' addresses for property subject to the proposed line, and the request asks for information not known to Neighbors United, is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

In regard to the members' names and addresses for property subject to the proposed line, Neighbors United respectfully requests until September 22, 2015, to respond to this part of the data request. The additional time to respond is necessary due the smaller size and resources of

the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 5:

For each parcel of real property identified in your response to Data Request Number 4, please state whether the parcel currently has within its boundaries other electric lines. For each line, if known, please identify the owner of the line or, alternatively, the record holder of any easement upon which the line is located. Further, if known, please identify what restrictions, if any, the lines currently located on the parcel place on the ability to conduct farming operations or ranching activities on the particular parcel (for the question reflected in this sentence, a copy of the easement, if in the possession of the owner, may be provided in lieu of an answer).

Response: Neighbors United objects to this data request in its entirety as such request asks for information that is protected by the attorney-client privilege and work product privilege, requests information equally accessible to ATXI after receipt of the members' names and addresses for property subject to the proposed line, and requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Data Request 6:

For each parcel of real property identified in your response to Data Request Number 4, please describe the farming or ranching activities that are being conducted, or that the owner plans to conduct, on the property.

Response: Neighbors United does not object to this request but respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 7:

For each member identified in your response to Data Request Number 2, please identify whether such member has attended any meeting held or hosted by ATXI regarding the Mark Twain Project.

Response: Neighbors United objects to this data request in its entirety as such request asks for information that is equally accessible to ATXI, requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation

as the legal entity and any ATXI meeting the corporation discussed attending after the date of Neighbor United's incorporation, June 17, 2015. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 8:

Please provide copies of all documents (whether in paper form, e-mails, or otherwise) made available and/or distributed by the Neighbors United, its members or agents to the public or a subset thereof (or to any news media personnel) regarding the Mark Twain Transmission Project, and please provide a list of the recipients of each such document.

Response: Neighbors United objects to this data request in its entirety as such request asks for publicly available documents that are equally accessible to ATXI, requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation as the legal entity and any public or media documents distributed by the legal entity after the date of Neighbor United's incorporation, June 17, 2015. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 9:

Please provide a complete copy of the PowerPoint presentation which includes the slide entitled "Ways to Make the Project More Expensive for ATXI" (as shown in a photograph posted on Neighbors United public Facebook page).

Response: Neighbors United objects to this data request in its entirety as such request asks for information that is protected by the work product privilege, requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Data Request 10:

Please identify any communication between a member or members of Neighbors United or its agents, and any County Commissioner in Schuyler, Adair, Knox, Shelby or Marion counties related to the proposed Mark Twain Project. For each such communication please provide:

- a. the names of the Neighbors United member(s) or County Commissioner(s) involved,
- b. the date of the communication,

- c. the form of communication (i.e., personal, written, electronic, telephonic communication, etc.),
- d. the substance of the communication, and
- e. attach any written document(s) or material(s) provided to or exchanged with the County Commissioner(s) related to said communication.

Response: Neighbors United objects to this data request in its entirety as such requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation as the legal entity and any communication the corporation had with any County Commissioner in Schuyler, Adair, Knox, Shelby or Marion counties related to the proposed Mark Twain Project after the date of Neighbor United's incorporation, June 17, 2015. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 11:

Please designate by name and address, which, if any, of the members of Neighbors United support the use of renewable energy in Missouri.

Response: Neighbors United objects to this data request in its entirety as such request is vague, requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation as the legal entity and its position on the use of renewable energy in Missouri after the date of Neighbor United's incorporation, June 17, 2015. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 12:

For each and every communication between a member or members of Neighbors United or it agents and ATXI its employees or agents, please provide:

- a. the agent or employee's name(s),
- b. the Neighbors United member(s) (or other persons) name(s),

- c. the date of the communication,
- d. the form of communication (i.e., personal, written, electronic, telephonic communication, etc.),
- e. the substance of the communication, and
- f. attach any written document(s) or material(s) provided to or exchanged with the agent or employee in said communication.

Response: Neighbors United objects to this data request in its entirety as such request asks for information that is equally accessible to ATXI, requests information not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation as the legal entity and any communication between the corporation and ATXI after the date of Neighbor United's incorporation, June 17, 2015. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 13:

Please designate any of the Neighbors United members identified in response to Data Request Number 2 above who have asserted a claim or complaint about any alleged health effects upon humans or livestock related to the existence of electric lines on or near their real property. Further identify the nature of that claim or complaint, when it was communicated, who it was directed to, and the status or resolution of the claim or complaint.

Response: Neighbors United objects to this data request in its entirety as such request asks for information that is not known to Neighbors United, is irrelevant and seeks information not reasonably calculated to lead to the discovery of admissible evidence, is burdensome and harassing, would impose unnecessary or unjust burdens or expense on Neighbors United under the circumstances and would require Neighbors United to collect information not in Neighbors United's possession or control on behalf of ATXI.

Without waiving any objection, Neighbors United will provide a response for the corporation as the legal entity and its position after the date of Neighbor United's incorporation, June 17, 2015, on health effects upon humans or livestock related to the existence of electric lines on or near real property. Neighbors United respectfully requests until September 22, 2015, to respond with this information. The additional time to respond is necessary due the smaller size and resources of the organization, the amount of data requested overall and that an administrator with access to some of the information has been out of the office since August 25, 2015, and will not return until September 11, 2015.

Data Request 14:

Provide a copy of your responses to all data requests propounded upon you by any other party

to this proceeding, both prior to and subsequent to the date of this request.

Response: No party has propounded data requests upon Neighbors United prior to ATXI's first request. Should Neighbors United receive further data requests, Neighbors United will forward ATXI the responses subject to the same objections and requests for additional time to the propounding party.

Respectfully,

/s/ Jennifer Hernandez

Jennifer Hernandez, MO Bar No. 59814

Attorney at Law

Hernandez Law Firm, LLC