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August 3, 2020

**VIA ELECTRONIC MAIL**

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**RE: Case Nos. WR-2020-0275; OPC DRs 3014-3021**  
**Missouri Public Service Commission**


Dear John,

We have received Data Requests (DRs) 3014-3021 from the Office of Public Counsel (OPC) related to the above-referenced case. In accordance with Commission Rule 20 CSR 4240-2.090(2), this letter should be considered an objection to those DRs on behalf of Elm Hills Utility Operating Company, Inc., (Elm Hills) for the following reasons:

a) the responsive information is not relevant to the subject proceeding, not proportional to the needs of the case considering the totality of the circumstances, nor reasonably calculated to lead to the discovery of admissible evidence in that it requests information concerning entities that are not regulated by the Missouri Public Service Commission; and, b) the information is beyond Elm Hill's possession, custody, and control.

**BRYDON, SWEARENGEN & ENGLAND P.C.**

By:



Dean L. Cooper