

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri¹ for Certificates of)
Convenience and Necessity for Solar Facilities) **File No. EA-2023-0286**

**STAFF’S STATEMENT OF
DISCOVERY ISSUES**

COME NOW the Staff of the Missouri Public Service Commission (“Staff”) and provides the Commission with a brief statement describing a discovery disagreement or concern involving another party.

On August 8, 2023, the Commission issued its Order Setting a Procedural Schedule. This order set Discovery Conference No. 1 for September 1, 2023. The Commission further ordered:

Not less than three (3) 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 must attend. If the parties do not identify any discovery disagreements or concerns as described herein, the presiding officer may cancel the conference.

The “other party” involved is Ameren Missouri. Staff advises the Commission that Ameren Missouri’s answer to Staff’s DRs 29 and 30 are not responsive.

WHEREFORE, Staff prays the Commission will accept this pleading as compliance with the Commission’s Order Setting a Procedural Schedule.

¹ Hereinafter, “Ameren Missouri.”

Respectfully Submitted,

/s/ Paul T. Graham

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 29th day of August, 2023.

/s/ Paul T. Graham