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October 13, 2015

Secretary Morris L. Woodruff  
Missouri Public Service Commission  
200 Madison Street, PO Box 360  
Jefferson City, MO 65102-0360

Via E-Mail and U.S. Mail  
morris.woodruff@psc.mo.gov

**FILED**

**OCT 14 2015**

RE: Request for Subpoena (4 CSR 240-2.100)/EC-2016-0001

Dear Secretary:

Missouri Public  
Service Commission

Ameren Missouri hereby requests that the Commission issue a subpoena duces tecum to Heather Jones, LIHEAP Manager, Missouri Department of Social Services, Family Support Division (DSS/FSD), to testify at a deposition and to produce certain documents at said deposition. Attached for this purpose is a form subpoena duces tecum, with its own Exhibit A that lists documents to be produced. The form (the form available on the Commission's website) has been modified to reflect that it pertains to a deposition, rather than a hearing before the Commission. Please advise if this is not acceptable, or if there is another form that should be used.

The documents sought, as well as Ms. Jones testimony, are relevant to the above-referenced complaint because they go to the issue of whether Ameren Missouri receives notification of, or otherwise may or may not verify, through DSS/FSD, through community action agencies, or through other home energy suppliers, the eligibility or receipt of by Ameren Missouri customers of LIHEAP assistance towards the customers' non-Ameren Missouri utility bills.

Please do not hesitate to contact me if you need additional information. Thank you.

Sincerely,

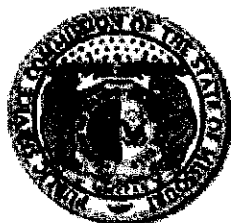


Sarah E. Giboney

Encls.

cc w/encl.: Senior Regulatory Law Judge Daniel Jordan  
Via E-Mail and U.S. Mail  
daniel.jordan@psc.mo.gov

**SUBPOENA DUCES TECUM**



THE STATE OF MISSOURI. To Heather Jones, LIHEAP Manager DFS/FSD

You are hereby commanded to be and appear personally before ~~The Public Service Commission of the State of Missouri or any Commissioner thereof~~ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_ at \_\_\_\_\_ o'clock of that day, at \_\_\_\_\_ in the County of \_\_\_\_\_,

in the State of Missouri, to testify at a <sup>deposition</sup> ~~hearing~~ in the matter of : Dzhurinskiy v. Union Electric Company d/b/a Ameren Missouri (EG-2016-0001).

And that you bring with you and produce at said <sup>deposition</sup> ~~hearing~~ the documents identified on the attached Exhibit A

Union Electric Company  
on behalf of d/b/a Ameren Missouri, and hereof fail not at your peril. The person or officer serving this writ is commanded to have the same at the time and place aforesaid, certifying thereon its return.

Given under my hand, this \_\_\_\_\_ day of \_\_\_\_\_,

\_\_\_\_\_, \_\_\_\_\_  
[Name] [Title]

**RETURN**

I HEREBY CERTIFY that I have served the within writ by reading the same in the presence and hearing of the within named \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, in \_\_\_\_\_ County, in the State of Missouri.

\_\_\_\_\_, \_\_\_\_\_  
[Name] [Title]

## EXHIBIT A

### TO SUBPOENA DUCES TECUM

- a. a copy of the 2015/2016 LIHEAP application;
- b. a copy of the most recent version of the Department of Social Services Family Support Division LIHEAP Policies and Procedures Manual;
- c. a copy of the State of Missouri's executed FFY 2016 LIHEAP model plan/grant application, with all attachments referenced in the plan, if any.
- d. a specimen or sample contract identical in form to executed contracts by and between the Missouri Department of Social Services Family Support Division and the Contract Agencies (community action agencies) that perform intake and eligibility determination functions for the Energy Assistance component of LIHEAP and that administer ECIP funds, with all attachments referenced in the contract, if any;
- e. a copy of the DSS/FSD Security Access and Confidentiality Agreement form referenced in the above-referenced sample Contract Agency contract;
- f. a specimen or sample contract identical in form to executed LIHEAP Supplier Contracts by and between the Missouri Department of Social Services Family Support Division and Home Energy Suppliers, with all attachments referenced in contract, if any;
- g. any release or waiver forms by which the Missouri Department of Social Services Family Support Division obtains the consent of an applicant or recipient of benefits to release to third parties information otherwise required by §208.120 RSMo not to be disclosed.

**SUBPOENA DUCES TECUM**



THE STATE OF MISSOURI. To Heather Jones, LIHEAP Manager DFS/FSD

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in the State of Missouri, to testify at a <sup>deposition</sup> ~~hearing~~ in the matter of : Dzhurinskiy v. Union Electric Company d/b/a Ameren Missouri (EC-2016-0001).

And that you bring with you and produce at said <sup>deposition</sup> ~~hearing~~ the documents identified on the attached Exhibit A

Union Electric Company  
on behalf of d/b/a Ameren Missouri, and hereof fail not at your peril. The person or officer serving this writ is commanded to have the same at the time and place aforesaid, certifying thereon its return.

Given under my hand, this 14<sup>th</sup> day of October, 2015  
DANIEL JORDAN, Senior Regulatory Law Judge  
[Name] [Title]

**RETURN**

I HEREBY CERTIFY that I have served the within writ by reading the same in the presence and hearing of the within named \_\_\_\_\_ on the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_, in \_\_\_\_\_ County, in the State of Missouri.

\_\_\_\_\_  
[Name] [Title]