

No. UE-MPSC-002

Data Information Request
From Union Electric Company d/b/a AmerenUE
MPSC Case No. EO-2010-0255

FILED
July 11, 2012
Data Center
Missouri Public
Service Commission

Requested From: Missouri Public Service Commission
Requested By: James B. Lowery
Date of Request: December 3, 2010

Information Requested:

Has Ms. Mantle ever been personally involved in the negotiation and execution of wholesale (as opposed to retail) power supply agreements. If the answer is "yes," please list all such agreements, and provide copies of the agreements and all documents (paper or electronic) in Ms. Mantle's or the Staff's possession, custody or control that relate or pertain to such agreements.

Response: No

Response Provided By: _____ Lena M. Mantle _____ Date: _____ 12/13/10 _____

Ameren Exhibit No. 17
Date 6-21-12 Reporter KF
File No. EO-2012-0074

Data Information Request
From Union Electric Company d/b/a AmerenUE
MPSC Case No. EO-2010-0255

Requested From: Missouri Public Service Commission

Requested By: James B. Lowery

Date of Request: December 3, 2010

Information Requested:

Has Ms. Mantle ever been personally involved in the development of requests for proposals (RFP) for the procurement of wholesale power and energy, or ancillary services? If the answer is "yes":

- a. Please provide a copy of any such referenced RFP and provide copies of all documents (paper or electronic) in Ms. Mantle's or the Staff's possession, custody or control] that relate or pertain to such RFP.

Response: Without waiving Staff's previous filed objection: I have been involved in the review and development of requests for proposals for the procurement of energy and capacity by Aquila, Inc., the Empire District Electric Company and Kansas City Power & Light Company. I reviewed and provided comments on at least three (3) draft or final RFPs for the Empire District Electric Company, five (5) draft or final RFPs for Aquila, Inc. and one RFP from Kansas City Power & Light Company.

- b. Please state whether any such RFP included a title or reference to full requirements or partial requirements.

Response: I did a search of each electronic document that I had with respect to the RFPs. None of the documents contained any reference to full requirements or partial requirements.

Response:

Response Provided By: _____ Lena M. Mantle _____ Date: _____ 12/13/10 _____

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Requested From: Missouri Public Service Commission

Requested By: James B. Lowery

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Information Requested:

Does Ms. Mantle have any personal experience in the development of responses to requests for proposals (RFP) for the procurement of wholesale power and energy, or ancillary services. If the answer is "yes,":

- a. Please provide a copy of any such referenced response to such an RFP and provide copies of all documents (paper or electronic) in Ms. Mantle's or the Staff's possession, custody or control] that relate or pertain to such response.
- b. Please state whether any such RFP or any response thereto included a title or reference to full requirements or partial requirements.

Response: No

Response Provided By: Lena M. Mantle Date: 12/13/10

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Please list, by document (paper or electronic) type, date, and author/recipient (if shown by the document) all documents reviewed (whether relied upon by Ms. Mantle or not) by Ms. Mantle in arriving at the opinions expressed in Ms. Mantle's testimony filed in this docket.

- Proposed tariff sheets filed in direct by AmerenUE witness Marty Lyons in ER-2008-0318 on April 4, 2008
- Order Denying AmerenUE's Application for Rehearing issued on February 19, 2009
- AmerenUE ER-2010-0036 settlement document showing Noranda load loss and AEP and Wabash offset
- Ameren Missouri FAC tariff sheets 98.1 through 95.6 effective March 1, 2009
- Staff report filed in EO-2010-0255 on August 31, 2010
- Supplement to Correction to Staff's Prudence Report and Recommendation in EO-2010-0255 filed on October 13, 2010

Response:

Response Provided By: _____ Lena M. Mantle _____ Date: _____ 12/13/10 _____

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In regard to Ms. Mantle's statement that she "asked Ameren Missouri what this phrase meant during a discussion where Ameren Missouri was clarifying the definition and phrases in its proposed FAC tariff sheet" and "Ameren Missouri told" her "it was a description of the wholesale contracts that Ameren Missouri had with municipal utilities to provide electricity to them," please provide the following:

- i. The specific date that this conversation occurred.
This conversation occurred during the Technical/Settlement Conferences, September 15-17, 2008 and October 16-17, 2008
- ii. The specific location at which that this conversation occurred.
This conversation occurred at the Governor Office Building in Jefferson City
- iii. The names, titles and affiliation of each individual present during such conversation.
This conversation took place during the technical conference discussion regarding the AmerenUE request for a FAC. In addition to Staff representatives, I am certain that there were AmerenUE representatives. Other parties representatives may have been present.
- iv. The specific person[s] who told her this;
An AmerenUE representative. I don't recall exactly which one.
- v. All notes, records, recordings or transcripts of the meeting during which this conversation occurred.
None available
- vi. All documents (paper or electronic) the otherwise make reference to, memorialize or evidence what she says Ameren Missouri told her.
None available
- vii. All other topics discussed during this conversation.
Other provisions in the original FAC tariff proposed by AmerenUE.

To the extent Ms. Mantle doesn't know the exact answers, please provide responsive information that she does know.

Response:

Response Provided By: Lena M. Mantle Date: 12/13/10