

Thompson, Kevin

From: Reed, Steven
Sent: Tuesday, April 05, 2011 9:40 AM
To: Thompson, Kevin
Cc: Woodruff, Morris
Subject: RE: Subpoena duces tecum -- AmerenMO Rate Case, ER-2011-0028

There is no form for the request. Since you sent the email to us you should file the email.

There is a form on the intranet or internet for the subpoena.

From: Thompson, Kevin
Sent: Tuesday, April 05, 2011 9:38 AM
To: Reed, Steven
Subject: RE: Subpoena duces tecum -- AmerenMO Rate Case, ER-2011-0028

Is there an official form or do I come up with my own?

Kevin A. Thompson
Chief Staff Counsel
Missouri Public Service Commission

From: Reed, Steven
Sent: Tuesday, April 05, 2011 9:37 AM
To: Thompson, Kevin
Cc: Woodruff, Morris
Subject: RE: Subpoena duces tecum -- AmerenMO Rate Case, ER-2011-0028

Prepare a subpoena for signature by me. File this request in the case along with the subpoena and return.

From: Thompson, Kevin
Sent: Tuesday, April 05, 2011 9:28 AM
To: Reed, Steven
Cc: Woodruff, Morris
Subject: Subpoena duces tecum -- AmerenMO Rate Case, ER-2011-0028

Steve and Morris--

I request issuance of a Subpoena Duces Tecum for the AmerenMO rate case, to be served tomorrow for production a week later on 4-13. The subpoena should be addressed to Thomas Voss, Chairman, Ameren Corporation, 1901 Chateau, St. Louis, MO 63103.

I need only a single document, a valuation study prepared by Lazard Freres and presented at a Board meeting in December 2009. I will not require the appearance of Mr. Voss. I am addressing the subpoena to him only because I know he has control over the document in question.

The study is relevant because it includes an estimation of the cost of common equity, which is one of the largest single issues in the rate case. It is material because it is expected to be significantly lower than the estimate sponsored by Ameren's expert witness in the case.

I have previously sought this document through DRs and have thoroughly discussed Ameren's objections with Ameren's counsel. They will not willingly produce the document. I believe a subpoena targeted on this single document will be easier to enforce; otherwise, I could go directly to a Motion to Compel based on the DRs and associated objections. I would in that case request a waiver of the telephonic conference with the RLJ.

Thank-you.

Kevin A. Thompson
Chief Staff Counsel
Missouri Public Service Commission