



June 28, 2021

Mr. Jeff Keevil
Deputy Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: File No. ER-2021-0240

Dear Jeff:

The Company will require up to July 30, 2021 to respond to DR Nos. 605, 606, 608, 609, 610, 611, 612, and 613 because they seek a broad array of information about the Company's Smart Energy Plan (apparently based on annual filings made in approximately February of each of the last three years) that will require work from a broad segment of areas and personnel at the Company.

The Company objects to DRs 621, 622, and 623 as they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and because they are overly broad and unduly burdensome, to the extent they seek information beyond the test year. Furthermore, the Company objects to DRs 621, 622, and 623 as the DRs generally seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, a response will be provided with available information.

The Company objects to DRs MPSC 102.2, 102.3, and 102.4 because they are overly broad, unduly burdensome, and oppressive in seeking documentation for such a volume of projects. Subject to the foregoing objections, a response will be provided. However, the Company also alerts Staff of the need for an extension until July 30, 2021 for DRs 102.1, 102.2, 102.3 to assemble responsive information.

The Company objects to DRs MPSC 240.1 and 240.2 because they are overly broad, unduly burdensome, and oppressive in seeking documentation for such a volume of facilities. Subject to the foregoing objections, a response will be provided.

The Company objects to DRs MPSC 475.1 and 615 as they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing objections, a response will be provided.

The Company also alerts Staff of the need for a seven-day extension for DRs 240.1, 240.2, 475.1, 604, 607, and 614-629 to allow processing of the responses while IT upgrades are completed.

Please let me know if you have any questions regarding the foregoing.

Sincerely,

/s/ Jermaine Grubbs
Jermaine Grubbs
Counsel for Ameren Missouri



June 24, 2021

Mr. Jeff Keevil
Deputy Staff Counsel
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102

Re: File No. ER-2021-0240

Dear Jeff:

The Company objects to DR Nos. 576, 577, 581, and 587 because they seek to require periodic updates rendering them overly broad, unduly burdensome and oppressive, and because such updates seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. The Company further objects because such request conflicts with procedure (k) of the *Order Adopting Procedural Schedule and Adopting Test Year*. Subject to the foregoing objections, the Company states that it will follow the process with the Staff set forth in the referenced procedure (k).

The Company objects to part 1 of DR No. 153.3 on the grounds that it is overly broad, unduly burdensome, and oppressive in requesting that the Company obtain “all documentation” which equates to roughly 2,000 items, and because the phrase “all documentation” is vague. Subject to the foregoing objections, a response spreadsheet listing the roughly 2,000 items will be provided.

The Company also alerts Staff of the need for a seven-day extension for DRs 576-592, 204.2, 204.3 and 153.3 to allow processing of the responses while IT upgrades are completed.

Sincerely,

/s/ Jermaine Grubbs
Jermaine Grubbs
Counsel for Ameren Missouri