

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust)
its Revenues for Electric Service) **File No. ER-2021-0240**

STAFF STATEMENT OF DISCOVERY DISAGREEMENT OR CONCERN

COMES NOW Staff of the Missouri Public Service Commission (“Staff”) and for its Statement of Discovery Disagreement or Concern (“Statement”) states as follows:

1. On June 9, 2021, the Commission issued an Order Setting Procedural Schedule and Adopting Test Year (“Order”). The Order set a Discovery Conference for July 20, 2021.

2. The Order also provided in paragraph 2(o) that
Not less than two 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.

3. Staff is filing this Statement to identify certain discovery disagreements or concerns regarding Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) responses to certain discovery requests submitted by Staff, as follows:

(a) as of 8:00 a.m., July 15, 2021, Ameren Missouri has either objected to and refused to answer or provided insufficient responses to data request (DR) numbers 105.2, 301-302, 337, 345, 487, 489, 492, 554, 587, 678-681, (see attached). These DRs all require at least a further partial response;

- (b) as of 8:00 a.m., July 15, 2021, responses to the following DRs (see attached) are overdue, being past the initial response time and any requested extension – DRs 55.1, 89.1, 104.4, 166.1, 240.1, 240.2, 573-574, 579, 582, 586, 588, 592, 615, 618, 619, 648;
- (c) Ameren Missouri has either objected to or requested what Staff believes to be an unreasonable extension to respond to the following DRs (attached): 102.1, 102.2, 102.3, 102.4, 605-606, 608-613.

WHEREFORE, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference scheduled for July 20, 2021.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Missouri Public Service
Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to parties of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 16th day of July, 2021.

/s/ Jeffrey A. Keevil