March 20, 2024

The Office of the Public Counsel

c/o Nathan Williams

200 Madison Street

Ste. 650

Jefferson City, MO 65102

 Be advised that this letter serves as an objection to the following data requests submitted to the Staff of the Missouri Public Service Commission on March 15, 2024.

In regards to data requests number 44 through 50 Staff objects to these requests as irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and as violating attorney/client privilege. Much of the requested information in these data requests seeks information controlled by the administrative bodies of the Public Service Commission and the State of Missouri and not information controlled by the Staff. The information requested is irrelevant to the decisions before the Missouri Public Service Commission in Case No. EF-2024-0021.

DR No. 44 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission Staff’s Request for Information (“RFI“) or Request for Proposal (“RFP”) for financial advisor(s) in this case. If additional follow-up information was requested from prospective vendors, please provide such follow-up information.

DR No. 45 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission Staff’s Request for Information (“RFI“) or Request for Proposal (“RFP”) for bond counsel in this case.

DR No. 46 - Please explain the Missouri Public Service Commission Staff’s decision making process in determining to award Ducera Partners LLC the financial advisor contract for this case. For example, were specific evaluation criteria used, such as experience in a minimum number of utility securitization transactions, estimated customer savings achieved by the financial advisor(s)’ participation, specific areas of capital market/financial experience, etc?

DR No. 47 - Please provide Ducera Partners LLC’s invoices for services provided to date in context of this case.

DR No. 48 - Please provide Staff’s outside bond counsel’s invoices for services provided to date in context of this case.

DR No. 49 - Please provide Ducera Partners LLC’s timesheets for each month in which it billed for services provided in this case.

DR No. 50 - Please provide Staff’s outside bond counsel’s timesheets for each month in which it billed for services provided in this case.

In regards to data requests number 51 through 64 Staff objects to these as irrelevant, not reasonably calculated to lead to the discovery of admissible evidence and as violating attorney/client privilege. Much of the requested information in these data requests seeks information controlled by the administrative bodies of the Public Service Commission and the State of Missouri and not information controlled by the Staff. The information requested references events that occurred in Case Nos. EO-2022-0040, EO-2022-0193 and EF-2022-0155, which do not bear effect on the decisions before the Missouri Public Service Commission in this case, EF-2024-0021.

DR No. 51 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission Staff’s RFI No. 37530822000349 in Case Nos. EO-2022-0040 and EO-2022-0193 and any other RFI or RFP issued in these cases by Staff. If additional follow-up information was requested from prospective vendors, please provide such follow-up information.

DR No. 52 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission Staff’s Request for Information (“RFI“)or Request for Proposal (“RFP”) for bond counsel in Case Nos. EO-2022-0040 and EO-2022-0193. If additional follow-up information was requested from prospective vendors, please provide such follow-up information.

DR No. 53 - Please explain the Missouri Public Service Commission Staff’s’ decision-making process in determining to award Ducera Partners LLC the financial advisor contract for Case Nos. EO-2022-0040 and EO-2022-0193. For example, were specific evaluation criteria used, such as experience in a minimum number of utility securitization transactions, estimated customer savings achieved by the financial advisor(s)’ participation, specific areas of capital market/financial experience, etc?

DR No. 54 - Please provide Ducera Partners LLC’s invoices for services provided in Case Nos. EO-2022-0040 and EO-2022-0193.

DR No. 55 - Please provide Staff’s outside bond counsel’s invoices for services provided to date in context of Case Nos. EO-2022-0040 and EO-2022-0193.

DR No. 56 - Please provide Ducera Partners LLC’s timesheets for each month in which it billed for services provided in Case Nos. EO-2022-0040 and EO-2022-0193.

DR No. 57 - Please provide Staff’s outside bond counsel’s timesheets for each month in which it billed for services provided in Case Nos. EO-2022-0040 and EO-2022-0193.

DR No. 58 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission’ Staff’s RFI or RFP for financial advisor(s) in Case No. EF-2022-0155. If additional follow-up information was requested from prospective vendors, please provide such follow-up information.

DR No. 59 - Please provide copies of each prospective vendor’s responses to the Missouri Public Service Commission Staff’s Request for Information (“RFI“)or Request for Proposal (“RFP”) for bond counsel in Case No. EF-2022-0155. If additional follow-up information was requested from prospective vendors, please provide such follow-up information.

DR No. 60 - Please explain the Missouri Public Service Commission Staff’s decision making process in determining to award Ducera Partners LLC the financial advisor contract for Case No. EF-2022-0155. For example, were specific evaluation criteria used, such as advisement for a minimum number of utility securitization transactions, estimated customer savings achieved by the financial advisor(s)’ participation, specific areas of capital market/financial experience, etc?

DR No. 61 - Please provide Ducera Partners LLC’s invoices for services provided in Case No. EF-2022-0155.

DR No. 62 - Please provide Staff’s outside bond counsel’s invoices for services provided to date in context of Case No. EF-2022-0155.

DR No. 63 - Please provide Ducera Partners LLC’s timesheets for each month in which it billed for services provided in Case No. EF-2022-0155.

DR No. 64 - Please provide Staff’s outside bond counsel’s timesheets for each month in which it billed for services provided in Case No. EF-2022-0155.

Respectfully,

**/s/ Whitney Scurlock**

Whitney Scurlock

Chief Deputy Staff Counsel

Missouri Bar No. 64078

Attorney for the Staff of the

Missouri Public Service Commission

P. O. Box 360

Jefferson City, MO 65102

(573) 751-7434 (Telephone)

(573) 751-9285 (Fax)

whitney.scurlock@psc.mo.gov