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July 1, 2024

Mr. David F. Barrett
P.O. Box 104151
Jefferson City, MO 65110

Via e-mail: dfbarrett@outlook.com

RE: File No. EC-2023-0037 – Complainant’s First Set of Data Requests to Ameren Missouri

Dear Mr. Barrett:

This letter reflects Ameren Missouri’s objections to Missouri Coalition for Fair Competition’s (“MCFFC”) above-referenced data requests (“DR”).

Ameren Missouri objects to DR Nos. 1.2 and 1.3 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, and are overly broad, unduly burdensome, oppressive, and vague. Subject to the foregoing objections, responses will be provided.

Ameren Missouri objects to DR Nos. 1.4 and 1.5 on the grounds that they seek information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Ameren Missouri objects to DR No. 1.6 on the grounds that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Sincerely,

/s/ James B. Lowery

James B. Lowery

Cc: Jennifer Moore, Crystal Tassello

