



EXHIBIT B

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October 21, 2024

Sarah Rubenstein
Great Rivers Environmental Law Center
319 N. 4th Street, Suite 800
St. Louis, MO 63102

RE: Sierra Club's First Set of Data Requests to Ameren Missouri, File No. EO-2025-0123

Dear Sarah:

Ameren Missouri objects to Sierra Club's Data Requests 1.1, 1.2, 1.3, 1.4, 1.5, 1.6, 1.7, 1.8, 1.9, 1.10, and 1.11 (all of them) on the grounds that 20 CSR 4240-22.080(3) does not contemplate a discovery process associated with IRP annual update filings. Additionally, each of these discovery requests is not reasonably calculated to the lead to the discovery of admissible evidence, is not relevant, and is overbroad and unduly burdensome.

Ameren Missouri also asserts the additional objections below to select data requests.

Ameren Missouri objects to Data Request 1.6 on the grounds that this request seeks information that Sierra Club and Ameren Missouri have already agreed will be provided in Ameren Missouri's next preferred resource plan filing, as set forth in the Parties' Joint Filing from June 2024.¹

Ameren Missouri objects to Data Request 1.8 on the grounds that this request seeks information that is highly confidential. Should the Commission overrule Ameren Missouri's other objections to Data Request 1.8, Ameren Missouri would produce the requested information subject to a protective order.

¹ See *Joint Filing, Attachment A*, at p. 6, File No. EO-2024-0020.

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Ameren Missouri objects to Data Requests 1.9 and 1.10 if and to the extent that they call upon Ameren Missouri to conduct analysis or studies that do not currently exist instead of seeking the discovery of existing facts, documents, or information, and are thus beyond the proper scope of discovery.

Sincerely,

/s/ William D. Holthaus, Jr.

William D. Holthaus, Jr.

CC: MoRegParalegals, Wendy Tatro, Jim Lowery, Matt Michels, Hande Berk