

EXHIBIT A

Ameren Missouri- OPC-001

Data Information Request
From Union Electric Company d/b/a AmerenUE
MPSC Case No. EC-2016-0001

Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

Please identify the exact testimony, data response requests, or other communications, in ER-2014-0258, by which OPC communicated to the Commission or to any party an understanding or belief that, under then-proposed tariff JE-2015-0290, Ameren Missouri's Energy Efficiency Investment Charge tariff (now MO P.S.C. Schedule No. 6, 1st Revised Sheet No. 90.1), Ameren Missouri customers who received LIHEAP Energy Assistance or ECIP funds towards a non-Ameren Missouri utility bill were "low-income" customers exempt from Rider EEIC.

Response:

The attached information provided to Union Electric Company in response to the above Data Information Request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform Union Electric Company if, during the pendency of Case No. EC-2016-0001 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

If these data are voluminous, please (1) identify the relevant documents and their location; (2) make arrangements with requestor to have documents available for inspection at a location mutually agreeable. Where identification of a document is requested, briefly describe the document (e.g., book, letter, memorandum, report) and state the following information as applicable for the particular document: name, title, number, author, date of publication and publisher, addresses, date written, and the name and address of the person(s) having possession of the document. As used in this Data Request, the term "document(s)" includes publication of any format, workpapers, letters, memoranda, notes, reports, analyses, computer analyses, test results, studies or data recordings, transcriptions and printed, typed or written materials of every kind in your possession, custody or control within your knowledge. The pronoun "you" or "your" refers to the person identified in the "Requested From" block above and all other employees, contractors, agents or others employed by or acting on behalf of the organization, group or governmental unit associated with that person. When used with respect to a natural person, "identify" means state his or her name, address, telephone number, current employer, job title, and current work telephone number.

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Data Information Request
From Union Electric Company d/b/a AmerenUE
MPSC Case No. EC-2016-0001

Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

- a. Please identify the means or process that OPC believes Ameren Missouri may use to identify customers who are eligible for exemption from Rider EEIC, where the customers are eligible for the exemption based on receipt of LIHEAP Energy Assistance or ECIP funds to pay a non-Ameren Missouri utility bill. Please identify the exact testimony, data response requests, or other communications by which OPC communicated this proposed means or process to the Commission or any party.
- b. If OPC proposes that Ameren Missouri accept documentation from customers, such as copies of Missouri Department of Social Services Family Support Division (DSS/FSD) payment notices, please identify the means or process that OPC believes a customer may use to submit such documentation. Please identify the exact testimony, data response requests, or other communications by which OPC communicated this proposed means or process to the Commission or any party.
- c. If OPC proposes that Ameren Missouri accept documentation from customers, please identify the means or process that OPC believes Ameren Missouri may use to verify that such documentation is authentic. Please identify the exact testimony, data response requests, or other communications by which OPC communicated this proposed means or process to the Commission or any party.

Response:

The attached information provided to Union Electric Company in response to the above Data Information Request is accurate and complete and contains no material misrepresentations or omissions, based upon present facts of which the undersigned has knowledge, information or belief. The undersigned agrees to immediately inform Union Electric Company if, during the pendency of Case No. ER-2016-0001 before the Commission, any matters are discovered which would materially affect the accuracy or completeness of the attached information.

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From Union Electric Company d/b/a AmerenUE
MPSC Case No. EC-2016-0001

Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

Please state whether OPC, and if so who, verified through a representative of the Missouri Department of Social Services Family Support Division (DSS/FSD) the authenticity of the Energy Assistance Payment Notice attached as page 2 of Attachment C to OPC's Motion for Summary Determination in EC-2016-0001. If not, why not?

Response:

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From Union Electric Company d/b/a AmerenUE
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Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

Please identify whether any staff of OPC, and if so who, are knowledgeable about the following:

- a. Missouri Department of Social Services Family Support Division (DSS/FSD) contracts with community action agencies to determine LIHEAP applicants' eligibility and to administer ECIP funds; and
- b. DSS/FSD contracts with home energy suppliers.

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Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

Please state whether OPC or any person on its behalf has analyzed or estimated the costs Ameren Missouri would incur in verifying whether customers have received LIHEAP Energy Assistance or ECIP funds towards a non-Ameren Missouri utility bill. If yes, please provide a) the estimated cost to Ameren Missouri and potentially other entities necessary to develop and maintain a self-reporting (or other) process for customers to report qualifying exemptions and for Ameren Missouri to validate and incorporate into its billing process and b) the increase in the MEEIA Rider charge to other non-qualifying customers to recover the costs not paid by qualifying low-income customers who received qualifying payments on non-Ameren Missouri utility bills. If yes, please also provide the analysis or estimation, with all supporting documentation. If yes, please also identify the exact testimony, data response requests, or other communications, if any, by which OPC communicated its analysis or estimations to the Commission or to any party.

Response:

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MPSC Case No. EC-2016-0001

Requested From: Office of Public Counsel

Requested By: Sarah Giboney

Date of Request: October 15, 2015

Information Requested:

Please state whether OPC believes Ameren Missouri’s estimation, in ER-2014-0258, of costs of implementing a MEEIA low-income exemption included costs a) to Ameren Missouri and potentially other entities necessary to develop and maintain a self-reporting (or other) process for customers to report qualifying exemptions and for Ameren Missouri to validate and incorporate into its billing process and b) the increase in the MEEIA Rider charge to other non-qualifying customers to recover the costs not paid by qualifying low-income customers who received qualifying payments on non-Ameren Missouri utility bills. If so, identify OPC’s basis for this belief.

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Information Requested:

Please state whether Sec. 208.120.1 RSMo permits or prohibits OPC from disclosing to Ameren Missouri upon Ameren Missouri's request information OPC may possess concerning the identify of applicants for or recipients of LIHEAP Energy Assistance, ECIP, or any other public benefit, or the contents of any related records, files, papers or communications. If your response is that OPC is permitted, please state the conditions under which OPC is permitted.

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