

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

Charles A. Harter,	)	
	)	
Complainant,	)	
	)	
v.	)	File No. EC-2023-0281
	)	
Union Electric Company	)	
d/b/a Ameren Missouri,	)	
	)	
Respondent	)	

**RESPONSE TO COMPLAINANT’S MOTION REQUESTING AN ORDER REQUIRING  
AMEREN MISSOURI TO ANSWER DATA REQUESTS**

Comes now, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”) and for its Response to Complainant’s Motion Requesting an Order Requiring Ameren Missouri to Answer Data Requests states:

1. Ameren Missouri received its first Data Request from Complainant on May 8, 2023.
2. Ameren Missouri sent Complainant its timely objection on May 18, 2023. Ameren Missouri stated:

Ameren Missouri objects to this Data Request because it seeks information that is irrelevant and immaterial. The Company further objects to the extent it would compromise the privacy rights of customers not named in this Complaint by revealing their confidential information. The Data Request is overly burdensome, cumulative, and vague.

3. Ameren Missouri further said:

Subject to the objections [listed in paragraph 2 above], the Company will provide information available regarding the notice of discontinuance sent to Complainant dated February 28, 2023.

4. Ameren Missouri provided the non-objectionable information to Complainant on May 30, 2023. May 28, 2023 was a Sunday, and May 29, 2023 was the Memorial Day holiday.

5. Ameren Missouri did not receive any additional Data Requests from Complainant until June 6, 2023 when it received “Notice of Complainant’s *Third* Data Requests Directed to Respondent Ameren Union Electric” (emphasis added).

6. Ameren Missouri plans on filing its timely objections to Complainant's third DRs no later than June 16, 2023, and will provide the non-objectionable information no later than June 26, 2023 in accordance with Commission rules.

7. Since the deadline for response to Complainant's third DRs has not passed, Complainant's Motion is untimely. Therefore, Ameren Missouri requests that Complainant’s Motion Requesting an Order Requiring Ameren Missouri to Answer Data Requests be denied as untimely.

**WHEREFORE,** for the aforementioned reasons Ameren Missouri prays that Complainant’s Motion Requesting an Order Requiring Missouri to Answer Data Requests be denied and for such additional relief as this honorable Commission deems fit and proper.

Respectfully submitted,

**Banks Law LLC**

/s/ Eric Kendall Banks

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**Counsel for Union Electric Company d/b/a  
Ameren Missouri**

**CERTIFICATE OF SERVICE**

I hereby certify that on June 14, 2023, I caused the aforementioned document to be electronically filed with the Secretary of the Public Service Commission of the State of Missouri who will send a copy to counsel for all parties of record.

*/s/ Eric Kendall Banks* \_\_\_\_\_