

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri’s Tariffs to Adjust)
its Revenues for Electric Service) **File No. ER-2021-0240**

STAFF STATEMENT OF DISCOVERY DISAGREEMENT OR CONCERN

COMES NOW Staff of the Missouri Public Service Commission (“Staff”) and for its Statement of Discovery Disagreement or Concern (“Statement”) states as follows:

1. On June 9, 2021, the Commission issued an Order Setting Procedural Schedule and Adopting Test Year (“Order”). The Order set a Discovery Conference for June 22, 2021.

2. The Order also provided in paragraph 2(o) that

Not less than two business days¹ before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement must attend. If the parties do not identify any discovery disagreements or concerns as described herein, the presiding officer may cancel the conference.

3. Staff is filing this Statement to identify certain discovery disagreements or concerns regarding Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) responses to certain discovery requests submitted by Staff, as follows:

¹ Due to the intervening Juneteenth holiday which was declared on June 17 and observed on June 18, this Statement is being filed on June 21.

(a) as of 8:00 a.m., June 17, 2021, Ameren Missouri has either objected to and refused to answer or provided insufficient responses to data request (DR) numbers 30, 102, 113, 104, 104.1, 248, 283, 284, 446, 447, 473, 525, 533 (see attached). These DRs all require at least a further partial response;

(b) as of 8:00 a.m., June 17, 2021, responses to the following DRs (see attached) are overdue, being past the initial response time and any requested extension – DRs 174.1, 216.1, 216.2, 18, 153.1, 212.1, 226.1, 226.2, 459, 460, 461, 462, 465, 486, 487, 488, 489, 490, 491, 492, 493, 502, 505, 506, 507, 508, 509, 510, 511, 513;

(c) Ameren Missouri has also shown an unwillingness to provide employee names as requested in data requests, having objected to providing names sometimes but not always, and having provided names sometimes but not always (see attached table). Staff requests the RLJ inform Ameren Missouri that employee names are generally discoverable and should be provided in response to the data requests on attached table.

WHEREFORE, Staff submits this Statement of Discovery Disagreement or Concern in advance of the Discovery Conference scheduled for June 22, 2021.

Respectfully submitted,

/s/ Jeffrey A. Keevil

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Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to parties of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 21st day of June 2021.

/s/ Jeffrey A. Keevil