

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for an Accounting)
Authority Order to Record and Preserve Net Costs and) GU-2021-0112
Revenues Related to COVID-19.)

MOTION TO CONSOLIDATE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or (“Company”), pursuant to 20 CSR 4240-2.110(3), and hereby requests the Commission to enter its order consolidating this electric Accounting Authority Order (“AAO”) case with the Company’s companion electric AAO case, File No. EU-2021-0027, filed on the same date, and as reasons therefor, states as follows:

1. On October 16, 2020 the Company filed its application for an AAO in this docket which seeks authority to defer certain COVID-19-related costs (including certain foregone revenues) and savings arising from its gas service operations, as described in the application. On that same date, the Company filed an identical application for an AAO in File No. EU-2021-0027 which seeks authority to defer certain COVID-19-related costs (including certain foregone revenues) and savings arising from its electric service operations, as described in the application in that case.

3. On October 19, 2020, the Commission issued Orders Directing Notice and Setting Deadline for Intervention Applications in each of File Nos. EU-2021-0027 and GU-2021-0112. Both Orders contemplate that applications to intervene shall be due November 10, 2020.

4. 20 CSR 4240-2.110(3) authorizes the Commission to consolidate cases where they involve related questions of law or fact. The foregoing together with the applications in this case and the electric case demonstrate that both of cases involve related questions of law and fact. Consequently, they should be consolidated for that reason, and for reasons of administrative

convenience and case management efficiency.

WHEREFORE, the Company hereby requests that the Commission enter its order consolidating File Nos. EU-2021-0027 and GU-2021-0112, that it designate File No. EU-2021-0027 as the lead case, and that it order that all pleadings and data requests hereafter filed or served in either case be filed or served using File No. EU-2021-0027 as the lead case.

Respectfully Submitted,

/s/ Wendy K. Tatro

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ATTORNEYS FOR UNION
ELECTRIC COMPANY d/b/a
AMEREN MISSOURI

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Application for Intervention was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 26th day of October, 2020.

/s/ Wendy Tatro

Wendy Tatro