

**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 Permission and)	
Approval and a Certificate of Public Convenience and)	File No. EA-2019-0371
Necessity Authorizing it to Construct Three Solar)	
Generation Facilities.)	

JOINT REQUEST FOR MODIFIED PROCEDURAL SCHEDULE

COME NOW Union Electric Company d/b/a Ameren Missouri ("Company," "Ameren Missouri," or "Applicant"), Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Renew Missouri Advocates d/b/a Renew Missouri, Missouri Department of Conservation ("MDC"), and Missouri Division of Energy ("DE") (collectively referred to hereafter as "Parties") to submit the following *Joint Request for Modified Procedural Schedule* and in support thereof state as follows:

1. On September 3, 2019, the Company filed an Application with the Missouri Public Service Commission ("Commission") requesting Certificates of Convenience and Necessity to construct, install, own, operate, maintain, and otherwise control and manage solar generation assets in or near Green City, Richwoods, and Utica, Missouri ("Requested CCNs").

2. On September 3, 2019, the Commission issued an *Order Directing Notice and Setting Intervention Deadline* allowing interested persons wishing to intervene until September 23, 2019, to file a motion to intervene in this matter. Applications to intervene were timely filed by Renew Missouri, MDC, and DE, and granted by the Commission.

3. Some parties indicated disagreement on certain points of legal interpretation of RSMo. Sections 393.1665 and/or 393.170 for the Requested CCNs. In order to ensure those legal issues are properly addressed, the Parties have agreed to allow filings regarding the legal interpretation of those Sections to be made coincident with testimony and any oral argument

concerning those Sections to precede the evidentiary hearing. Parties are not precluded from raising legal arguments as they see fit in their brief.

4. The Parties discussed and arrived unanimously at a proposed procedural schedule to allow for Commission order by the Company's requested timeframe of January 15, 2020, and filed a *Unanimous Proposed Procedural Schedule* on October 29, 2019.

5. On October 30, 2019, the Commission ordered the Parties to confer and jointly suggest a date for an evidentiary hearing to be held in December 2019 or January 2020.

6. The Parties conferred and agreed to jointly suggest the following dates for an Evidentiary Hearing: December 12-13, 2019.

7. Via email on November 7, 2019, the Regulatory Law Judge informed the Parties that the jointly suggested hearing dates would not work.

8. On November 8, 2019, the Commission entered an Order Setting Procedural Schedule, which altered certain dates the Parties had agreed upon.

9. The altered dates created conflicts for Staff, and the Parties conferred and arrived jointly at the following modified procedural schedule:

Proposed Modified Procedural Schedule

Rebuttal Testimony and any Filing Regarding Interpretation of Sections 393.1665 and/or 393.170, RSMo., for the Requested CCNs by Parties other than the Company Due	December 6, 2019
Surrebuttal Testimony of the Company, Any Cross-Surrebuttal of other Parties, and Any Response to Other Parties' Filings Regarding Interpretation of Sections 393.1665 and/or 393.170, RSMo., for the Requested CCNs by the Company Due	December 23, 2019
List of Issues (Factual and Legal) Due	January 2, 2020

Statements of Position Due

January 3, 2020

Oral Argument of Parties Regarding
Interpretation of Sections 393.1665 and/or
393.170, RSMo., for the Requested CCNs
and Evidentiary Hearing

January 7 & 8, 2020

Post-Hearing Briefs

January 20, 2020

10. The foregoing Modified Procedural Schedule will address Staff's scheduling conflicts and allow the Parties more time for discovery and preparation around the Holidays. Ameren Missouri hopes this timeline will still allow for a Commission order by the end of January 2020.

WHEREFORE, Ameren Missouri respectfully submits this *Joint Request for Modified Procedural Schedule* on behalf of the Parties for the Commission's information and consideration, and respectfully requests the Commission issue an order establishing this modified procedural schedule for this matter.

Respectfully submitted,

/s/ Wendy Tatro

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

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the public version of the foregoing Application has been e-mailed, this 14th day of November, 2019, to the Missouri Public Service Commission Staff, Office of the Public Counsel, and all parties of record in this case.

/s/ Wendy Tatro
Wendy Tatro