

**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.)	

UNANIMOUS PROPOSED 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 *Unanimous Proposed 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 have discussed and arrived unanimously at a proposed procedural schedule that allows for Commission order by the Company's requested timeframe of January 15, 2020:

Proposed 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	November 18, 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 4, 2019
List of Issues (Factual and Legal) Due	December 6, 2019 by 12:00 p.m.
Statements of Position Due	December 9, 2019
Oral Argument of Parties Regarding Interpretation of Sections 393.1665 and/or 393.170, RSMo., for the Requested CCNs and Evidentiary Hearing	December 11-12, 2019
Post-Hearing Briefs Due	December 23, 2019
Requested Commission Order	On/before January 15, 2020

4. The Parties have also discussed and agreed upon more compressed data request response timeframes. The Parties agree that objections and notices of extension are due within three (3) business days, and responses to the data requests are due within seven (7) business days of service.

WHEREFORE, Ameren Missouri respectfully submits this *Unanimous Proposed Procedural Schedule* on behalf of the Parties for the Commission's information and consideration, and respectfully requests the Commission issue an order establishing this 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 29th day of October, 2019, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

/s/ Wendy Tatro
Wendy Tatro