

**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)	File No. EA-2019-0181
Certificate of Public Convenience and)	
Necessity Under 4 CSR 240-3.105.)	

MOTION TO DELAY SURREBUTTAL TESTIMONY

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and requests the Missouri Public Service Commission ("Commission") delay the date for submission of Surrebuttal Testimony as set forth below:

1. On July 31, 2019, multiple parties in this case submitted a *Stipulation and Agreement* ("*Stipulation*") in this matter, resolving all issues in this case¹ except for those raised by the Western Missouri & Kansas Laborers District Council ("WMKLDC").

2. Ameren Missouri and WMKLDC have continued discussions to determine whether settlement of the remainder of this case is feasible. In order to maintain focus on negotiations, the Company requests a delay in the date for submission of surrebuttal testimony from August 5, 2019, until August 13, 2019. Since the *Stipulation* significantly reduced the issues remaining for hearing, and since thirteen days will still remain between the submission of surrebuttal and the start of hearing, delay should not cause harm to the parties.

3. Ameren Missouri queried the parties to this matter. All parties responded that they had no objection to the delay.

¹ The following were signatories to the *Stipulation*: Commission Staff; Missouri Department of Conservation; Renew Missouri; Missouri Division of Energy.
The following authorized the signatories to indicate that they did not object to the *Stipulation*: Sierra Club; Natural Resources Defense Council; and Office of Public Counsel.
The Office of Public Counsel also submitted a *Notice of Non-Objection to Stipulation and Agreement* with the Commission on July 31, 2019.

WHEREFORE, Ameren Missouri respectfully requests that the Commission delay the date for submission of surrebuttal testimony from August 5, 2019, to August 13, 2019, as set forth above.

Respectfully submitted,

/s/ Paula N. Johnson

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

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on all parties in this case via electronic mail (e-mail) on this 2nd day of August, 2019.

/s/ Paula N. Johnson

Paula N. Johnson