

BEFORE THE MISSOURI PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the matter of Union Electric Company d/b/a     )  
Ameren Missouri's LED Street Lighting Update     )  
and Tariff Filing   )

**File No. ET-2016-0152**  
Tariff No. YE-2016-0159

RESPONSE AND RECOMMENDATION OF  
INTERVENOR CITY OF O'FALLON

COMES NOW Intervenor City of O'Fallon (O'Fallon) and in response to the Commission's December 17, 2015 Notice of Tariff Filing and Order Establishing Time to File Recommendations by December 31, 2015, states:

- 1) O'Fallon commends Ameren Missouri LED Streetlighting Report and its plan to convert its existing enclosed and open bottom street lighting facilities to LED over the next five years as part of its routine maintenance, i.e. to replace existing streetlighting with LED lights upon normal light failure.
- 2) O'Fallon does not have the ability to analyze Ameren's proposed LED streetlighting tariffs and file a recommendation under such a short time frame deadline.
- 3) O'Fallon will want to review Staff's recommendation due also on December 31, 2015 and O'Fallon would request a reasonable period of time to respond to Staff's recommendation.

WHEREFORE, O'Fallon requests the Commission accept its Response and Recommendation and grant O'Fallon reasonable time to review Staff's Recommendations and respond.

Respectfully Submitted,

---

CURTIS, HEINZ, GARRETT &  
O'KEEFE, P.C.

/s/ Leland B. Curtis

---

Leland B. Curtis, #20550  
Edward J. Sluys, #60471  
130 S. Bemiston, Suite 200  
St. Louis, Missouri 63105  
(314) 725-8788 (Office)  
(314) 725-8789 (FAX)  
Email: [lcurtis@chgolaw.com](mailto:lcurtis@chgolaw.com)  
[elsuys@chgolaw.com](mailto:elsuys@chgolaw.com)

Attorneys for the City of O'Fallon

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing documents was either faxed, emailed, or mailed to the persons listed on the attached list on the 30th day of December 2015

/s/ Leland B. Curtis

Office of Public Counsel  
Dustin Allison  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcsevice@ded.mo.gov](mailto:opcsevice@ded.mo.gov)

Department of Staff Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[staffcounselsevice@psc.mo.gov](mailto:staffcounselsevice@psc.mo.gov)

Hampton Williams  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Hampton.Williams@psc.mo.gov](mailto:Hampton.Williams@psc.mo.gov)

Wendy Tatro  
Union Electric Co.  
1901 Chouteau Ave.  
P.O. Box 66149 (MC1310)  
St. Louis, MO 63166  
[amerenmoservice@ameren.com](mailto:amerenmoservice@ameren.com)

City of O'Fallon, Missouri  
Leland B. Curtis  
130 S. Bemiston Ave. Ste. 200  
St. Louis, MO 63105  
[lcurtis@chgolaw.com](mailto:lcurtis@chgolaw.com)

City of O'Fallon, Missouri  
Edward J. Sluys  
130 S. Bemiston Ave. Ste. 200  
St. Louis, MO 63105  
[esluys@chgolaw.com](mailto:esluys@chgolaw.com)

Missouri Division of Energy  
Alexander Antal  
301 West High St.  
P.O. Box 1157  
Jefferson City, MO 65102  
[Alexander.Antal@ded.mo.gov](mailto:Alexander.Antal@ded.mo.gov)