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)	File No. ET-2021-0020
for Approval of Efficient Electrification Program.)	

MOTION TO SUSPEND PROCEDURAL SCHEDULE AND REQUEST FOR EXPEDITED TREATMENT

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") and submits to the Missouri Public Service Commission ("Commission") this *Motion* to Suspend Procedural Schedule and Request for Expedited Treatment ("Motion"). In support of its position, the Company states as follows:

- 1. The adopted procedural schedule in this case calls for the filing of Rebuttal Testimony by February 12, 2021, Surrebuttal Testimony by February 26, 2021, and other components of a procedural schedule leading to a hearing currently scheduled for March 11 12, 2021. During the pendency of this procedural schedule, several parties to this proceeding have been participating in settlement negotiations, and are confident an agreement can ultimately be reached.
- 2. Given the approaching deadline for Rebuttal Testimony for the other parties to this proceeding, Ameren Missouri asks that the testimony portion of the procedural schedule be suspended so that the parties can focus on the content of the settlement in principle. Ameren Missouri requests an expedited ruling on this Motion so that the parties can avoid the diversion of attention required for the preparation of rebuttal testimony. The benefit of expediting a ruling will be that the settling parties may continue to focus on commemorating their agreement in writing,

which will simplify this proceeding and avoid the drafting of testimony that will ultimately become obsolete. This *Motion* was filed as soon as possible under the circumstances.

3. Ameren Missouri has consulted with the other parties in this proceeding. The Commission Staff, the Office of the Public Counsel, the Missouri Propane Gas Association, and Renew Missouri Advocates d/b/a Renew Missouri have all authorized the undersigned counsel to indicate that they do not oppose the suspension of the procedural schedule.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant this *Motion*, and grant such other and further relief as it deems just under the circumstances.

Respectfully submitted,

<u>|s| Paula N. Johnson</u>

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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 the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 11th day of February, 2021.

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Paula N. Johnson