

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of Union Electric Company d/b/a Ameren)
Missouri's Filing to Implement Regulatory Changes in) File No. EO-2012-0142
Furtherance of Energy Efficiency as Allowed by MEEIA.)

**JOINT MOTION OF THE COMMISSION STAFF AND AMEREN MISSOURI
FOR STAY OF PROCEDURAL SCHEDULE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and the Staff of the Missouri Public Service Commission ("Staff"), and for their Motion for Stay of the Procedural Schedule respectfully state as follows:

1. On January 20, 2012, Ameren Missouri filed an application under the Missouri Energy Efficiency Investment Act ("MEEIA") and the Commission's MEEIA rules in Case No. EO-2012-0142. On July 5, 2012, Ameren Missouri, together with other interested parties, submitted to the Commission for approval a Unanimous Stipulation and Agreement ("Stipulation") related to the Company's implementation of MEEIA. The Commission issued an Order approving the Stipulation on August 1, 2012, and as amended on December 19, 2012.

2. The Stipulation contained provisions related to the evaluation, measurement and verification ("EM&V") of energy efficiency measures undertaken by Ameren Missouri, including procedures whereby a party may request changes to the impact portion of the Final EM&V Reports for each year. The process by which leave is sought to change a Final EM&V Report is referred to as a "Change Request." Ameren Missouri has now completed the first year of energy efficiency measures, and third party evaluators Cadmus and ADM, have completed EM&V activities culminating in the filing of the evaluators' Final EM&V Reports as revised on June 12, 2014 (Collectively referred to as "Evaluators' Final EM&V Reports").

3. Ameren Missouri and Staff have both filed Change Requests in this case, and the parties have requested changes to evaluation results that are substantially different and present controverted issues of fact for the Commission to determine. No other party has filed a Change Request in this case.

4. Staff and Ameren Missouri both recognize that the current schedule does not accommodate a full and complete time frame in which to conduct discovery and prepare fully informed responses to each other's Change Requests. The current case is the first EM&V review conducted pursuant to the agreed upon process outlined in the Stipulation, and accordingly, the issues presented are novel matters of first impression. The issues are also very technical in nature, and therefore, significant review and analysis of documents and information is required of the parties to this proceeding. Earlier revised evaluators' Final Reports were needed from the evaluators in order to correct some initial errors, and it has recently been discovered that revisions to the Commission's Auditor's Final EM&V Report to correct some errors in that report will also have to be made, and that a revised Auditor's Final EM&V Report will need to be submitted.

5. The parties are also continuing to explore whether a settlement of the issues in this case can be reached. Finalization of the revisions to the Auditor's Final EM&V Report and discovery is likely needed in order to continue exploring settlement.

6. Accordingly, the movants request an indefinite stay of the current schedule. At this time, the movants request that the schedule be stayed until such time as a replacement schedule to govern the remainder of the case becomes appropriate. The parties are in regular conference and will endeavor in good faith to later develop an appropriate replacement schedule going forward.

7. The record will benefit from a full and complete discovery process, and the Commission will be afforded the benefit of more articulate and informed positions of the parties by allowing them more time to conduct discovery and confer as to the matters at issue in this case.

8. The other active parties to this case, Missouri Department of Economic Development - Division of Energy, and the Office of Public Counsel, have been apprised of this Motion and have indicated they have no objection.

WHEREFORE, Staff and Ameren Missouri respectfully request that the Commission grant this Joint Motion, stay the procedural schedule, and grant any other and further relief as it deems just and equitable.

Respectfully submitted,

Matthew R. Tomc

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been hand-delivered, transmitted by e-mail or mailed, First Class, postage prepaid, this 19th day of August, 2014, to counsel for all parties on the Commission's service list in this case.

/s/ Matthew R. Tomc