

**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 Necessity Authorizing )  
It to Offer a Pilot Subscriber Solar Program and )  
File Associated Tariff )

**Case No. EA-2016-0207**  
**Tracking No. YE-2016-0291**

**JOINT MOTION TO RELIEVE STAFF FROM FILING A RECOMMENDATION**

**COME NOW** Staff of the Missouri Public Service Commission (“Staff”) and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), by and through the undersigned counsel, and in response to Ameren Missouri’s April 27, 2016 Application for Tariff Approval and contemporaneously filed MO.P.S.C Schedule No. 6, 1<sup>st</sup> Revised Sheet No. 164, bearing an effective date of November 23, 2016<sup>1</sup> (Tracking No. YE-2016-0291), moves the Commission to relieve the Staff from the requirement to file a recommendation on the tariff. In support of this Joint Motion, Staff and Ameren Missouri respectfully state the following:

1. On April 27, 2016, Ameren Missouri filed an Application for Tariff Approval to offer a Pilot Subscriber Solar Program, which will later involve an application for a Certificate of Convenience and Necessity (“CCN”) to build the solar facility.

2. On May 4, 2016, the Office of Public Counsel (“OPC”), supported by Staff in a separate filing dated May 6, 2016, requested a procedural conference. The Commission granted this motion on May 11, 2016 and ordered an off the record procedural conference be held on May 24, 2016.

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<sup>1</sup> Original effective date of May 27, 2016; was later changed by Ameren Missouri to August 25, 2016 in a Tariff Extension Letter-Subscriber Solar Pilot filed May 17, 2016, and was later changed by Ameren Missouri again to November 23, 2016 in a Tariff Extension Letter-Subscriber Solar Pilot filed today.

3. A procedural conference was held on May 24, 2016, in which the parties scheduled several technical conferences to discuss tariffs, implementation and accounting. Two conferences were held on May 20 and July 13, 2016. Another conference has been scheduled for July 22, 2016, and there are plans for a fourth technical conference.

4. The Commission ordered Staff to file a recommendation by July 14, 2016.<sup>2</sup>

5. Staff's investigation is ongoing; among other things, Ameren Missouri is currently in the process of responding to outstanding data requests, and Staff and Ameren Missouri expect to discuss other information and possible resolutions of issues in connection with the scheduled technical conferences.

6. In light of the number of intervenors<sup>3</sup> and the complexity of the issues, this case may be contested such that additional testimony and hearings would be required to resolve it, but an agreed-upon resolution, in whole or in part, also may be possible. No procedural schedule has been formalized in this case, but if an agreement cannot be reached following the technical conferences, it is likely a procedural schedule will be agreed upon following the technical conferences.

7. Therefore, Staff and Ameren Missouri anticipate Staff would make its recommendation to the Commission by joining an agreement resolving the case, in whole or in part, by opposing an agreement or by filing testimony pursuant to a later agreed-upon schedule in a contested case proceeding.

**WHEREFORE**, Staff and Ameren Missouri request the Commission enter its order relieving Staff from its obligation to file its recommendation by July 14, 2016, and allowing Staff

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<sup>2</sup> *Order Extending Time for Filing Recommendation*, filed May 18, 2016.

<sup>3</sup> The parties include Missouri Industrial Energy Consumers, Missouri Division of Energy, United for Missouri, Renew Missouri, Brightergy, LLC, and Walmart Stores, Inc., which, along with Staff, OPC, and Ameren Missouri, brings the number of parties in the case to nine (9).

to present its findings and recommendation in its testimony, if no earlier agreement can be reached.

Respectfully submitted,

**/s/ Nicole Mers**

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**Attorneys for Union Electric Company d/b/a  
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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 14<sup>th</sup> day of July, 2016.

**/s/ James B. Lowery**