

In the Matter of a Union Electric Company d/b/a )  
Ameren Missouri's Cost Allocation Manual (CAM). ) File No. EO-2017-0176  
)

COME NOW the parties to this docket, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), the Staff of the Missouri Public Service Commission (“Staff”), and the Office of the Public Counsel (“OPC”), and for their Joint Motion to Suspend Procedural Schedule state as follows:

2. As the parties requested in the Stipulation, the Commission adopted a procedural schedule which, among other things, called for the development of a draft Cost Allocation Manual, comments thereon to be provided by Staff and OPC, and a series of technical conferences. The procedural schedule also established a deadline of July 21, 2017, for the

<sup>1</sup> The Stipulation was treated by the Commission as unanimous under 4 CSR 240-2.115.

Company, Staff, and OPC to either file an agreed-upon Cost Allocation Manual or, absent agreement, direct testimony, which would then be followed by additional rounds of testimony and a hearing to occur September 26-28, 2017.

3. To date, all of the procedural milestones provided by the procedural schedule have occurred, including the development by the Company of a draft Cost Allocation Manual, the provision of initial comments on the draft Cost Allocation Manual from the Staff and OPC, completion of the two technical conferences provided for by the Procedural Schedule,<sup>2</sup> and completion of two additional technical conferences not provided for by the Procedural Schedule.<sup>3</sup> On June 30, 2017, the parties will participate in what will now be a fifth technical conference, as set by the procedural schedule.

4. The technical conferences and exchanges of information that have thus far occurred have been very productive, but significant work remains. Staff and OPC are continuing to review more than 100 formal and informal data requests responses provided by the Company, and Staff has provided the Company additional informal data requests within the last few days. Staff has also recently shared with the parties feedback on additional documents related to the Company's May 16 draft Cost Allocation Manual.

5. The development of a Cost Allocation Manual is a significant undertaking for all parties. While the parties are making good progress, all agree the best path forward toward a resolution of this docket (the goal being to develop and request Commission approval of an appropriate Cost Allocation Manual for Ameren Missouri), is to suspend the procedural schedule. This will allow the parties to continue their work together without the constraints of the imminent deadlines and milestones of the current schedule.

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<sup>2</sup> Which took place in Jefferson City on April 25 and June 16, 2017.

<sup>3</sup> Which took place in Jefferson City on June 9 and June 23, 2017.

6. Specifically, the Company, Staff, and OPC request the Commission issue its order suspending the current procedural schedule through October 31, 2017. The parties also jointly request that the order also require Staff to file a status report on or before October 31 (either individually or jointly with the Company and/or OPC), detailing the progress being made by the parties in this docket, and what issue areas may remain unresolved, if any, that will necessitate the Commission set a procedural conference for purposes of scheduling the filing of testimony and an evidentiary hearing. If any party does not join the status report, the Commission should order responses to the status report be filed by that party within 10 days of said order.

7. The Company, Staff, and OPC agree that the suspension requested herein does not prejudice any party's right to make a filing prior to October 31, 2017, if a party believes that sufficient progress is not being made, and the suspension of the procedural schedule should be lifted and a revised procedural schedule should thereafter be put in place to resolve this docket.

WHEREFORE, the Company, Staff, and OPC respectfully request that the Commission issue its order suspending the current procedural schedule through October 31, 2017, requiring Staff to file a status report by that date (either individually or jointly with the Company and/or OPC) respecting the progress in this docket, and setting a deadline for responses to the status report to be filed by any parties who do not join in its filing within 10 days thereafter.

Respectfully submitted,

/s/ James B. Lowery

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**CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record of this case on this 30th day of June, 2017.

*James B. Lowery*  
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