

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

In the Matter of the First True-Up	)	
Filing Under the Commission-	)	
Approved Fuel Adjustment Clause of	)	File No. ER-2010-0274
Union Electric Company d/b/a Ameren Missouri.	)	

**JOINT MOTION TO ACCEPT STIPULATION OF FACTS,  
FURTHER SUSPEND TRUE-UP TIMELINE, AND REVISE BRIEFING SCHEDULE**

COME NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”) and the Staff of the Missouri Public Service Commission (the “Staff”) and hereby request that the Commission accept the Stipulation of Facts submitted concurrently herewith, further suspend the true-up timeline, and revise the previously agreed-upon briefing schedule. In support thereof, the Company and the Staff state as follows:

1. The Commission previously suspended the timeline of the true-up from January 29, 2011 to May 29, 2011, and also ordered the parties to file a proposed procedural schedule by February 4, 2011.
2. On February 4, 2011, the Company and the Staff timely filed a proposed procedural schedule, but also indicated that they were meeting on February 7, 2011 to further discuss whether the facts relating to this true-up proceeding are in fact undisputed. The Company and the Staff met on February 7 and tentatively agreed that the facts were undisputed, and then proceeded to draft a Stipulation of Facts.
3. Since that time the parties have worked diligently to complete the Stipulation of Facts. However, developing the Stipulation of Facts took longer than originally anticipated, in part due to the

further discussions that took place on February 7.<sup>1</sup> The Company and the Staff have now agreed on the Stipulation of Facts, which is being filed concurrently herewith.

4. Given the delay in finalizing the Stipulation of Facts, and to accommodate upcoming procedural deadlines and hearing dates in the Company's pending general rate proceeding, the Company and the Staff have agreed to changes in the originally proposed briefing schedule. Because those agreed-upon changes extend the final briefing into May, 2011, the Company and the Staff recognize that the Commission will need to further suspend the true-up timeline.

5. Consequently, the Company and the Staff request that the Commission modify the briefing schedule and extend the suspension period, as follows:

Ameren Missouri's Initial Brief	Due March 22, 2011
Staff's Responsive Brief	Due April 21, 2011
Ameren Missouri's Reply Brief	Due May 20, 2011
True-up Timeline Suspension	Extended to June 30, 2011

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<sup>1</sup> The Procedural Schedule contemplated that a Stipulation of Facts would be filed by February 18, 2011. When it was apparent that the Stipulation of Facts would not be completed on that date, Staff Counsel contacted the Regulatory Law Judge to advise him that the Stipulation would be delayed. The Regulatory Law Judge indicated that a formal pleading extending the due date need not be filed at that time.

WHEREFORE, the Company and the Staff hereby request that the Commission modify the briefing schedule and extend the true-up timeline suspension, as requested herein.

SMITH LEWIS, LLP

**/s/James B. Lowery**

James B. Lowery, #40503  
Suite 200, City Centre Building  
111 South Ninth Street  
P.O. Box 918  
Columbia, MO 65205-0918  
Phone (573) 443-3141  
Facsimile (573) 442-6686  
[lowery@smithlewis.com](mailto:lowery@smithlewis.com)

**Attorneys for Union Electric Company d/b/a  
Ameren Missouri**

UNION ELECTRIC COMPANY  
d/b/a Ameren Missouri

Thomas M. Byrne, #33340  
Managing Associate General Counsel  
1901 Chouteau Avenue, MC-1310  
P.O. Box 66149, MC-1310  
St. Louis, MO 63101-6149  
(314) 554-2514 (Telephone)  
(314) 554-4014 (Facsimile)  
[tbyrne@ameren.com](mailto:tbyrne@ameren.com)

STAFF OF THE MISSOURI PUBLIC  
SERVICE COMMISSION

**/s/ Nathan Williams**

Nathan Williams  
Deputy Counsel  
Missouri Bar No. 35512  
Attorney for the Staff of the  
Missouri Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102  
(573) 751-8702 (Telephone)  
(573) 751-9285 (Fax)  
[nathan.williams@psc.mo.gov](mailto:nathan.williams@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served via e-mail on all counsel of record to the case in which the fuel adjustment clause in effect for the true-up filing made herein was approved, on this 3rd day of March, 2011.

/s/James B. Lowery