

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

In the Matter of Union Electric Company d/b/a Ameren)
Missouri for Permission and Approval and a Certificate)
of Public Convenience and Necessity Authorizing it to)
Construct, Install, Own, Operate, Maintain and) File No. EA-2015-0273
Otherwise Control and Manage Solar Generation)
Facilities in Montgomery County, Missouri.)

JOINTLY PROPOSED PROCEDURAL SCHEDULE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), on behalf of itself and all of the other parties to this case, the Staff of the Missouri Public Service Commission (the “Staff”), the Office of the Public Counsel (“OPC”), the Division of Energy of the Department of Economic Development (“DE”), the Missouri Industrial Energy Consumers (“MIEC”) and United for Missouri, Inc. (“UFM”), and hereby submits the Jointly Proposed Procedural Schedule set forth below and, with respect thereto, states as follows:

1. During the Prehearing Conference held by the Commission on September 2, 2015, the Regulatory Law Judge presiding over this case directed the parties to file a proposed procedural schedule by September 11, 2015. The Regulatory Law Judge later extended the due date to September 15, 2015. The parties to this pleading have reached agreement on a proposed procedural schedule, which is reflected herein. Those parties request that the Commission adopt the procedural schedule set forth in paragraph 2 below, and also adopt the related procedural items that have been agreed upon, as reflected in paragraph 3 below.

2. The Proposed Procedural Schedule agreed upon by the parties to this pleading is as follows:

Procedural Schedule

Company Files Direct Testimony	October 9, 2015
Non-Company Parties File Rebuttal Testimony	November 20, 2015
Company Files Surrebuttal/Other Parties Cross-Surrebuttal Testimony	December 22, 2015
Last Day to Request Discovery	January 15, 2016
Deadline to File List of Issues, List of Witnesses, Order of Cross-Examination, and Order of Opening Statements	January 19, 2016
Deadline to File Statements of Position	January 21, 2016
Evidentiary Hearings	January 25-27, 2016
Deadline to File Initial Briefs	February 19, 2016
Deadline to File Reply Briefs	March 11, 2016

3. The parties to this pleading have also agreed to the following procedures and request the Commission order these agreed to procedures be included in the Commission's Order setting the Procedural Schedule for this case:

(a) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel by electronic means and in electronic form essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

(b) Parties shall try to not include highly confidential or proprietary information in data request questions. If either highly confidential or proprietary information must be included in data request questions, the highly confidential or proprietary information will be appropriately designated as such pursuant to 4 CSR 240-2.135.

(c) Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a

sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of Ameren Missouri data request responses, Ameren Missouri shall post its data request responses on its Caseworks Extranet site; however, in the case of responses to data requests Staff issues to it, Ameren Missouri shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.)

(d) If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to (except that, with the exception of responses to Staff, responses will not be needed for Ameren Missouri data request responses posted on the Company's Caseworks Extranet site).

(e) Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing highly confidential or proprietary information shall be appropriately marked.

(f) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. With the exception of workpapers provided to Staff, Ameren Missouri may provide workpapers by posting the same on its Caseworks Extranet site, with e-mail notification to counsel for the parties to be provided essentially concurrently with the posting of workpapers on the Extranet site. Ameren Missouri shall provide its workpapers to Staff in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.

(g) Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

(h) All data requests, subpoenas, or other discovery requests or notices shall be issued no later than January 15, 2016. With regard to deposing a witness, so long as a notice of

deposition is issued by January 15, 2016, the deposition may occur so long as it is scheduled to occur on or before January 22, 2016.

(i) All motions to compel a response to any discovery request shall be filed no later than January 20, 2016.

(j) Until the filing of Direct Testimony, the response time for all data requests shall be 20 calendar days, and 10 calendar days to object or notify that more than 20 calendar days will be needed to provide the requested information. After the filing of Direct Testimony and before the filing of Rebuttal Testimony, the response time for data requests shall be 10 calendar days to provide the requested information, and 5 business days to object or notify that more than 10 calendar days will be needed to provide the requested information. After the filing of Rebuttal Testimony, the response time for data requests shall be 5 business days to provide the requested information, and 2 business days to object or notify that more than 5 business days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day. The Commission may rule on discovery motions filed after Surrebuttal Testimony is filed without holding the conference required by 4 CSR 240-2.090(8)(B).

WHEREFORE, the Company, on behalf of all of the parties, hereby files the Jointly Proposed Procedural Schedule set forth in paragraph 2 above, and requests that the Commission adopt the same and include in its order its adoption of the procedural items requested by the parties in paragraph 3 above.

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**ATTORNEYS FOR UNION
ELECTRIC COMPANY d/b/a
AMEREN MISSOURI**

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 this 15th day of September, 2015.

/s/ James B. Lowery
James B. Lowery