

**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	)	File No. EA-2019-0371
Necessity Authorizing it to Construct Three Solar	)	
Generation Facilities.	)	

**MOTION TO DELAY PROCEDURAL SCHEDULE**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and requests the Missouri Public Service Commission ("Commission") delay the entire remaining procedural schedule in this matter as set forth below:

1. On September 3, 2019, the Company filed an Application with the Commission requesting Certificates of Convenience and Necessity to construct, install, own, operate, maintain, and otherwise control and manage solar generation assets in or near Green City, Richwoods, and Utica, Missouri.

2. On November 25, 2019, the Company filed a Request for *Leave to Amend Original Application and Amended Application* with the Commission. No party objected to the Company's request.

3. On December 12, 2019, witnesses on behalf of Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Missouri Department of Conservation ("MDC"), and Missouri Division of Energy ("DE") submitted rebuttal testimony. Renew Missouri Advocates d/b/a Renew Missouri is a party to the case, but did not submit rebuttal testimony.

4. Based on concerns raised in the parties' rebuttal testimony, due to the likely benefit of additional informal technical conferences among all parties, and to promote efficient use of Commission and parties' time and resources, Ameren Missouri requests that the remaining

procedural schedule be delayed until after its pending electric rate case (File No. ER-2019-0335) is resolved.

5. Specifically, the following deadlines should be **suspended**:

Surrebuttal Testimony of the Company, Any Cross-Surrebuttal of other Parties, and Any Response to Other Parties' Filings Regarding Interpretation of Sections 393.1665 and/or 393.170, RSMo., for the Requested CCNs by the Company Due	December 23, 2019
List of Issues (Factual and Legal) Due	January 2, 2020
Statements of Position Due	January 3, 2020
Oral Argument of Parties Regarding Interpretation of Sections 393.1665 and/or 393.170, RSMo., for the Requested CCNs and Evidentiary Hearing	January 7 & 8, 2020
Post-Hearing Briefs	January 20, 2020

6. Ameren Missouri queried the parties to this matter. All parties responded that they had no objection to the delay.

7. If this *Motion* is granted, Ameren Missouri plans to wait until its pending electric rate case (File No. ER-2019-0335) is resolved before filing a request to establish the remaining procedural schedule for this matter. However, in the interim, the Company will continue technical discussions with the parties. The Company will also consult with other parties before requesting to establish the remaining procedural schedule.

**WHEREFORE**, Ameren Missouri respectfully requests delay of the entire remaining procedural schedule in this matter until after its pending electric rate case (File No. ER-2019-0335) is resolved.

Respectfully submitted,

\s\Wendy K. Tatro

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

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing *Motion to Delay Procedural Schedule* has been e-mailed, this 18<sup>th</sup> day of December, 2019, to the Missouri Public Service Commission Staff, Office of the Public Counsel, and all parties of record in this case.

/s/ Wendy K. Tatro  
Wendy K. Tatro