

**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 an Accounting)
Authority Order to Record and Preserve Net Costs and) File No. EU-2021-0027
Revenues Related to COVID-19.)

**MOTION TO SUSPEND PROCEDURAL SCHEDULE
AND REQUEST FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri, and for its unopposed Motion to Suspend Procedural Schedule and Request for Expedited Treatment, states as follows:

1. The adopted Procedural Schedule in this case calls for Ameren Missouri to file Direct Testimony one week from today, on February 5, 2021. It then affords other parties approximately two full months to file rebuttal testimony, with hearings if necessary, to occur in mid-May.

2. The parties are engaged in productive settlement discussions and believe it highly likely that they will either settle this case in the next several days or determine that settlement is not possible. In either case, there is sufficient “float” in the current schedule to make a modest adjustment in the due date for the filing of Ameren Missouri’s direct testimony, if that becomes necessary, while still affording other parties sufficient time to prepare rebuttal testimony without impairing the timeline for resolving this case, as reflected in the current Procedural Schedule.

3. It would be a better use of Ameren Missouri’s time to devote the attention required to reach what it believes is a likely settlement of this case than to be required to divert its attention from those efforts to prepare and file direct testimony that will likely ultimately be unnecessary. Consequently, Ameren Missouri respectfully requests that the Commission suspend the Procedural Schedule pending the filing of either a settlement resolving the case or a further status report no later than Wednesday, February 10, 2021.

4. Counsel for the Staff of the Commission, the Office of the Public Counsel, the Midwest Energy Consumers Group, and Renew Missouri have authorized Ameren Missouri's undersigned counsel to state that they do not oppose this Motion.¹

5. Ameren Missouri requests an expedited ruling on this Motion so that it can avoid the diversion of attention and required effort to begin preparing rebuttal testimony. The benefit of expediting a ruling will be that Ameren Missouri may continue to focus on reaching a likely resolution of this case by settlement, which will in turn avoid the harm of preparing unnecessary testimony and delaying settlement discussions. Neither the general public nor any party will be prejudiced by granting this Motion. This Motion was filed as soon as possible under the circumstances.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant this Motion, and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully Submitted,

/s/ James B. Lowery

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

¹ The undersigned counsel has been unable to obtain a response from counsel for the Missouri Industrial Energy Consumers or the Consumers Council of Missouri.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing Motion was served on all parties of record in this case via electronic mail (e-mail) or via regular mail on this 29th day of January, 2021.

/s/ James B. Lowery
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