

**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-2018-0202
Necessity Authorizing it to Construct a Wind Generation)
Facility.)

**MOTION TO SUSPEND
PROCEDURAL SCHEDULE**

COME NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), the Staff of the Missouri Public Service Commission ("Staff"), Renew Missouri Advocates ("Renew Missouri"), the Missouri Industrial Energy Consumers ("MIEC"), the Missouri Department of Conservation ("MDC"), the Missouri Department of Economic Development – Division of Energy ("DE"), the Natural Resources Defense Council ("NRDC"), and the Office of the Public Counsel ("OPC") (collectively, the "Movants") and submit this Motion to Suspend Procedural Schedule ("Motion"), as follows:

1. On this date, Movants filed a Third Stipulation and Agreement (the "Third Stipulation") that fully resolves this case, except for one narrow issue described in paragraph 15 of the Third Stipulation (Sierra Club is not a signatory, but does not oppose the Third Stipulation). Movants agree that the existence of that issue does not prevent the Commission from approving the Third Stipulation and issuing a Certificate of Convenience and Necessity ("CCN") prior to resolution of that issue.

2. The Third Stipulation provides that the issue will be resolved based on pre-filed testimony already submitted in this docket, an up to one-day evidentiary hearing (only three witnesses, one each for OPC, the Company, and the Staff filed testimony on this issue), and post-hearing briefing. The Third Stipulation further asks the Commission to set that hearing on one

of the available hearing dates (October 31 to November 2) that had been reserved for resolving this case.

3. Given the narrowness of the issue, Movants respectfully suggest that there is no need for leaving the remainder of the current procedural schedule in place. Consequently, Movants request that the current procedural schedule be suspended. In lieu thereof, the Movants suggest that the one-day hearing be set as noted above and that at the conclusion of that hearing the Regulatory Law Judge take input from the parties and set a briefing schedule with respect to this one issue.

WHEREFORE, Movants request that the current procedural schedule be suspended as outlined above.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
SMITH LEWIS, LLP
P. O. Box 918
Columbia, MO 65205
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com

/s/ Wendy K. Tatro

Wendy K. Tatro, Mo. Bar #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1301
St. Louis, MO 63103
(T) (314) 554-3484
(F) (314) 554-4014
AmerenMOService@ameren.com

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

/s/ Nicole Mers

Nicole Mers, Mo. Bar #66766
Staff Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(T) 573-751-6651
(F) 573-751-9285

Nicole.mers@psc.mo.gov

*Attorney for the Staff of
Missouri Public Service Commission*

/s/ Tim Opitz

Tim Opitz, Mo. Bar #65082
409 Vandiver Dr., Bldg. 5, Ste. 205
Columbia, MO 65202
(T) 573-303-0394, Ext. 3
(F) 573-303-5633

tim@renewmo.org

Attorney for Renew Missouri

/s/ Lewis Mills

Lewis Mills, Mo. Bar #35275
221 Bolivar St., Ste. 101
Jefferson City, MO 65102
(T) 573-556-6627
(F) 573-556-7447
Lewis.mills@bclplaw.com

/s/ Diana M. Vuylsteke

Diana M. Vuylsteke, Mo. Bar #42419
221 N. Broadway, Ste. 3600
St. Louis, MO 63012
(T) 314-259-2543
(F) 314-259-2020
dmvuylsteke@bclplaw.com

**Attorneys for Missouri Industrial
Energy Consumers**

/s/ Stephanie S. Bell

Stephanie S. Bell, Mo. Bar #61855
308 E. High Street, Suite 300
Jefferson City, MO 65101
(T) 573-750-4100
sbell@ellingerlaw.com

**Attorney for Missouri Department
Of Conservation**

/s/ Henry B. Robertson

Henry B. Robertson, Mo Bar #29502
319 N. Fourth St., Suite 800
St. Louis, MO 63102
(T) 314-231-4181
(F) 314-231-4184
hrobertson@greatriverslaw.org

**Attorney for Natural Resources
Defense Council**

/s/ Brian T. Bear

Brian T. Bear, Mo. Bar #61957
301 W. High St., Room 680
Jefferson City, MO 65102
(T) 573-526-2423
bbear.deenergycases@ded.mo.gov

Attorney for Missouri Division of Energy

/s/ Ryan Smith

Ryan Smith, Mo. Bar #66244
Senior Counsel
Ryan.smith@ded.mo.gov

/s/ Caleb Hall

Caleb Hall, Mo. Bar #68112
Senior Counsel
Caleb.hall@ded.mo.gov

200 Madison Street, Suite 650
Jefferson City, MO 65102
(T) 573-751-4857
(F) 573-751-5562

**Attorneys for the Office of the
Public Counsel**

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 counsel of record this 12th day of October, 2018.

/s/ James B. Lowery

James B. Lowery