

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) File No. EO-2015-0055
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

**MOTION TO MODIFY PROCEDURAL SCHEDULE
AND FOR EXPEDITED TREATMENT**

COMES NOW, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and pursuant to 4 CSR 240-2.080, hereby respectfully requests that the Missouri Public Service Commission (Commission) enter its order modifying the current procedural schedule in this case, and that it give expedited treatment to this Motion. In support of these requests, Ameren Missouri states as follows:

1. On February 18, 2015, the Commission issued its *Order Setting Procedural Schedule* (Procedural Schedule). The Procedural Schedule was largely consistent with a “compromise” procedural schedule submitted by the Staff. At the time, the Company believed that the schedule would provide sufficient time for Commission consideration for two reasons: (1) this is the second MEEIA case and it is relatively consistent in approach to what was approved in the first case; and (2) the Company was engaging in technical conferences to narrow the issues. On March 20, 2015, rebuttal testimony was filed by eleven separate witnesses from seven different parties. After reviewing this extensive testimony, it was apparent that the issues in this case have not narrowed – in fact they have expanded beyond that which the Company expected. The number and extent of the issues that have arisen render the current Procedural Schedule inadequate to properly develop surrebuttal testimony and, importantly, to provide the Commission with the information it needs to consider Ameren Missouri’s second proposed cycle of MEEIA energy efficiency programs. Rebuttal testimony has raised issues that might suggest that some modifications to

Ameren Missouri's original plan are warranted in order to improve that plan, and Ameren Missouri wants to thoughtfully analyze and consider whether that is the case in responding to the issues rebuttal testimony rose. Rebuttal testimony has also revealed that additional information may be helpful to the parties (and the Commission as well), but some of that information must be the product of additional analyses that will take more time than the current schedule allows to develop and present.

2. Ameren Missouri's originally-proposed schedule was designed to allow this case to be processed as quickly as reasonably possible,¹ but in a time frame that would have given Ameren Missouri ample time to implement the Plan after the Commission order. The Staff sought additional time in its compromise schedule and the Company did not object. The Company has every reason to expedite the processing of this case,² but at the same time it is important that the Commission have the benefit of a thoughtful and informed record. More time is needed to provide that benefit, in light of the issues that have been raised.

3. Because more time is needed, Ameren Missouri requests the Commission modify the procedural schedule dates as follows:

- April 27 – Surrebuttal Testimony/Cross-Surrebuttal Testimony
- May 4 – List of Issues
- May 11 – Position Statements
- June 2-4 – Hearing
- June 19 – Initial Brief
- June 30 – Reply Brief

4. Ameren Missouri also requests expedited treatment of this request. Expedited consideration of this Motion is required because testimony is presently due on April 13, 2015, and

¹And did not insist on processing the case within 120 days of its filing, as it would have been entitled to do under 4 CSR 240-20.094(3).

² The current MEEIA programs expire at the end of 2015. Significant work must be completed before the end of 2015 to put a second cycle of MEEIA programs in place by January 1, 2016, and such work must be timely completed to avoid a gap in energy efficiency program offerings.

without resolution next week, consideration of this Motion will not occur in time for the parties to have advanced notice of the grant or denial of this request. After the several days it took to review and analyze the eleven pieces of rebuttal testimony that were filed, the Company has been in contact with the other parties in an effort to find modified dates that would work for the parties, which also took time. Consequently, this Motion was filed as soon as it could have been under the circumstances. The harm that will be avoided by granting this Motion is the inadequacy of the information the Commission needs to properly consider the Company's MEEIA cycle 2 Plan, and possible modifications to address legitimate issues parties have raised, which is important to ensuring the continuation of a robust set of energy efficiency programs at Ameren Missouri beyond 2015. There will be no negative effect on the Company's customers or the general public if this request is granted because the Company has determined that it can still complete the needed work by the end of the year under the proposed revised schedule, although extra efforts will be needed to do so; indeed, as noted, granting this request will be beneficial to customers and to the general public. Therefore, the Company asks the Commission to (i) require any responses to this Motion to be filed by no later than 12:00 p.m., CDT, on Tuesday, April 7, 2015, and (ii) to issue an order ruling on this Motion by no later than 5:00 p.m., CDT, on Wednesday, April 8, 2015.

5. Ameren Missouri inquired of all of the thirteen non-Company parties to this case and the majority of them (listed below) have indicated that they do not oppose this Motion:

- Commission Staff (Staff);
- Missouri Energy Consumers Group (MECG);
- Sierra Club;
- Renew Missouri;
- Missouri Industrial Energy Consumers (MIEC);
- United for Missouri (UFM);
- Missouri Division of Energy (DE); and
- Kansas City Power & Light (KCPL).

WHEREFORE, Ameren Missouri requests that the Commission approve the modified procedural schedule set forth herein, and grant expedited treatment requiring responses by noon on April 7, and issuing its order approving this Motion by 5:00 p.m. on April 8, as requested herein.

Respectfully submitted,

/s/ Matthew R. Tomc

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in this case on this 2nd day of April, 2015.

/s/ Matthew R. Tomc