

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

Jerreld Fisher)	
)	
Complainant,)	
)	
vs.)	Case No: EC-2017-0281
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
Respondent.)	

**RESPONDENT UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI'S
MOTION FOR LEAVE TO AMEND ITS ANSWER,
AFFIRMATIVE DEFENSES AND MOTION TO DISMISS (4 CSR 240-2.080(18))**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and for its Motion for Leave to Amend Its Answer, Affirmative Defenses and Motion to Dismiss states as follows:

1. On May 30, 2017, Ameren Missouri filed its Answer, Affirmative Defenses and Motion to Dismiss (“Answer”) in response to Complainant’s complaint filed on April 26, 2017.
2. More than ten days have passed since the Answer was filed.
3. Subsequent to the filing of the Answer, Complainant filed documents that may be considered pleadings responsive to the Answer.
4. Upon review of its Answer, counsel for Ameren Missouri discovered that its answers to certain allegations of the Complaint were inartfully pleaded and do not reflect the Company’s position on a disputed issue. In addition, due to a typographical error, amounts set forth in paragraphs 6.f, 6.g and 6.j were incorrect.
5. No discovery has been conducted, no prehearing conference has been conducted and Staff has not yet filed its Report. Therefore, no party will be adversely affected by granting the Company leave to file an amended Answer.
6. Per the Commission’s Rule, 4 CSR 240-2.080(18), a pleading may be amended at any time by leave of the Commission. Counsel for the Company regrets the errors and seeks leave to amend.

WHEREFORE, Respondent Union Electric Company d/b/a Ameren Missouri respectfully requests the Commission grant Ameren Missouri leave to amend its Answer, Affirmative Defenses and Motion to Dismiss filed on May 30, 2017.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Motion for Leave to File an Amended Answer, Affirmative Defenses and Motion to Dismiss was served on all of the following parties via electronic mail (e-mail), and also served on Complainant via U.S. Mail, on this 21st day of June, 2017.

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