

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

Noranda Aluminum, Inc., et al.,)	
)	
Complainants,)	
)	
v.)	File No. EC-2014-0223
)	
Union Electric Company, d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

**AMEREN MISSOURI’S REQUEST
TO MODIFY PROCEDURAL SCHEDULE**

COMES NOW Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or the “Company”) and hereby respectfully requests that the Commission modify the procedural schedule in the above-captioned case and, as reasons therefor, states as follows:

1. On April 23, 2014 the Commission, on its own motion, issued an *Order Modifying Procedural Schedule* (the “Order”) and thereby scheduled evidentiary hearings for July 28 through August 1, 2014.
2. The undersigned counsel for Ameren Missouri and two of Ameren Missouri's witnesses have conflicts during some or all of that week. The undersigned counsel's conflict is a vacation trip in which his family and two other families (15 family members in all) will share a house on the Gulf Coast to celebrate milestone birthdays. This trip has been planned for over a year, and neither the house nor those planning to make the trip (due to school and college schedules of several of the kids who will go) can make the trip at any other time. Consequently, there is no opportunity to reschedule it.
3. For the foregoing reasons, and not in any way in any effort to gain any advantage for Ameren Missouri or to disadvantage or prejudice any other person or the Commission,

Ameren Missouri respectfully requests that the evidentiary hearings be rescheduled to August 11-15, 2014 to allow the undersigned counsel to take this trip and to avoid conflicts of a couple of other of its witnesses.¹ The Commission's hearing calendar is open during that week, and the Company has consulted with both the Staff and Complainants, who indicate that they have no objection to rescheduling the evidentiary hearings to August 11-15, 2014.²

4. Ameren Missouri and the undersigned attorney recognize that whether to reschedule the evidentiary hearing is a matter committed to the sound discretion of the Commission, and that there could be circumstances that the Commission determines require that the requested relief be denied. However, absent such circumstances we respectfully request that the Commission reschedule the evidentiary hearings, and also adjust each of the post-evidentiary hearing procedural schedule dates by a like number of days (14) to preserve same intervals between those deadlines, as follows:

- Initial Briefs due August 29, 2014
- Reply Briefs due September 12, 2014
- Anticipated Decision October 10, 2014

WHEREFORE, for the reasons stated herein, Ameren Missouri respectfully requests that the Commission make and enter its order modifying the procedural schedule in this case as proposed above, and for such other and further relief as is reasonable and necessary under the circumstances.

¹ As the Commission is aware, the undersigned is Ameren Missouri's long-time and principal outside regulatory attorney, and does not feel it appropriate to decline what he views as his obligation to diligently, competently and zealously represent Ameren Missouri in a case of this nature, including to perform a substantial role during the evidentiary hearings, as is typical for his representation of the Company in major cases. It is for that reason that this request is being made.

² It is our expectation that the Complainants, Ameren Missouri and the Staff will likely sponsor all or almost all of the witnesses in these cases.

Respectfully submitted,

UNION ELECTRIC COMPANY
d/b/a Ameren Missouri

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**ATTORNEYS FOR UNION ELECTRIC
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CERTIFICATE OF SERVICE

I hereby certify that a copy of this document was served on counsel for all parties of record in File Nos. EC-2014-0223 via electronic mail this 5th day of May, 2014

/s/ James B. Lowery