

**\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                    )                    File No. ET-2018-0063  
for Approval of 2017 Green Tariff.                         )

**JOINT MOTION TO SUSPEND PROCEDURAL SCHEDULE**

COME NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), the Staff of the Missouri Public Service Commission (“Staff”), the Missouri Department of Economic Development – Division of Energy (“DE”), Wal-Mart Stores, Inc. (“Wal-Mart”), the Missouri Industrial Energy Consumers (“MIEC”), Wind on the Wires (“WOW”), the Natural Resources Defense Council (“NRDC”), the Sierra Club (“Sierra Club”), Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”), and the Office of the Public Counsel (“OPC”) (collectively, the “Signatories”), by and through their respective counsel, and hereby request that the Procedural Schedule approved by Commission order on April 25, 2018 be suspended due to their settlement of this case.<sup>1</sup> In support of their request, the Signatories state as follows:

1.           On April 13, 2018, all Signatories except OPC filed a Non-Unanimous Stipulation and Agreement (“First Stipulation”) resolving all issues in this case.<sup>2</sup> Thereafter, OPC timely objected to the First Stipulation, which became the position of the First Stipulation’s signatories.

2.           The parties then sought approval of a procedural schedule to resolve the case, which as noted was approved by the Commission on April 25, 2018. The approved schedule set

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<sup>1</sup> Kansas City Power & Light Company and KCPL-Greater Missouri Operations Company (collectively, “KCP&L”) are the other parties to this docket and have authorized the Signatories to indicate that KCP&L has no objection to the requested suspension.

<sup>2</sup> KCP&L did not oppose the First Stipulation.

evidentiary hearings to occur on June 26-27, 2018, and certain other deadlines, including for the filing of an Issues List, etc. on June 13, 2018.

3. Concurrently with the filing of this request, the Signatories (which now include OPC) have filed a Second Non-Unanimous Stipulation and Agreement (“Second Stipulation”) that fully resolves this case between them (as was the case with the First Stipulation, KCP&L has authorized the Signatories to indicate that it does not oppose the Second Stipulation).

4. The Second Stipulation eliminates the need for further contested proceedings respecting the Company’s proposed Renewable Choice Program, which obviates the need for the further procedural milestones reflected in the approved procedural schedule.

5. Consequently, the Signatories ask that the Commission issue its order suspending the procedural schedule and, ultimately, an order approving the Second Stipulation and thereby approving the Renewable Choice Program on the terms outlined in the Second Stipulation. While the Signatories do not know whether the Commission wishes to have an on-the-record presentation respecting the Second Stipulation, if such a presentation is desired the Signatories suggest that it could be held on either of the dates currently reserved for evidentiary hearings.

WHEREFORE, the Signatories respectfully request the Commission to issue an order suspending the procedural schedule in this case.

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**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 the service list of record of this case on this 12th day of June, 2018.

*James B. Lowery*  
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