

**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 Approval of a Tariff Setting a Rate for )  
Electric Vehicle Charging Stations. )

Case No. ET-2016-0246

**MOTION TO MODIFY PROCEDURAL SCHEDULE TO  
EXTEND THE DATE FOR FILING SURREBUTTAL TESTIMONY  
AND REQUEST FOR EXPEDITED CONSIDERATION**

Under authority of, and in accordance with, 4 CSR 240-2.080, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) moves the Commission for an order modifying the procedural schedule to extend the date for filing surrebuttal testimony from Friday, December 16, 2016, to Monday, December 19, 2016.

1. In its November 9, 2016, *Order Setting Procedural Schedule and Other Procedural Requirements*, the Commission set December 16, 2016, as the date for filing surrebuttal testimony in this case.

2. Because of the press of other matters – more specifically, the need to review voluminous direct testimony filed Friday, December 9, 2016, in File No. ER-2016-0179, the Company’s pending general rate case – Ameren Missouri does not believe it can complete and file surrebuttal testimony in this case by the date prescribed in the procedural order. Therefore, the Company requests an order modifying the procedural schedule to extend to December, 19, 2016, the date for such testimony.

3. The extension Ameren Missouri requests should not otherwise affect or delay the procedural schedule, including the evidentiary hearing scheduled for January 12, 2017. Accordingly, no party to this case would be prejudiced if the motion is granted, and the Commission’s ability to hear, consider, and decide issues raised by the case would not be delayed or otherwise affected.

4. Ameren Missouri contacted all parties to the case and, with the exception of the Office of the Public Counsel and the Missouri Energy Consumers Group, have authorized the Company to represent they do not object to the extension requested in this motion.

5. Because surrebuttal testimony currently must be filed December 16, 2016, under authority of, and in accordance with, 4 CSR 240-2.080(14), Ameren Missouri requests expedited consideration of its motion, and a ruling either granting or denying the motion by close of business Thursday, December 15, 2016. Although the requested schedule for ruling on the motion is extremely truncated, an order by December 15 is necessary to avoid confusion as to when parties must file their surrebuttal testimonies. Ameren Missouri represents its request for expedited treatment could not be avoided because the Company did not finally conclude additional time was necessary until the date the motion was filed.

WHEREFORE, for the reasons stated above, Ameren Missouri requests an order extending to December 19, 2016, the date for all parties to file surrebuttal testimony. And because time is of the essence, the Company further requests such order be issued no later than close of business Thursday, December 15, 2016.

Respectfully submitted,

By: /s/ L. Russell Mitten

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**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing filing was served via e-mail on counsel for all parties of record on this 14<sup>th</sup> day of December, 2016.

**/s/ L. Russell Mitten**