

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

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

**MOTION OF NHT AND TOWER GROVE CDC
REQUESTING TO BE EXCUSED FROM HEARING**

COME NOW the National Housing Trust (“NHT”) and Tower Grove Neighborhoods Community Development Corporation (“Tower Grove CDC”), pursuant to rule 4 CSR 240-2.110, and hereby submit this Motion requesting that the undersigned counsel be excused from the hearing in the above-styled case.

1. Following Union Electric Company d/b/a Ameren Missouri’s (“Ameren Missouri”) filing of the original application of this case on December 22, 2014 in this case, both NHT and Tower Grove CDC were granted intervention as parties on January 21, 2015.
2. On November 30, 2017, Ameren Missouri filed for approval of a “Flex Pay” pilot program in this case, the subject of the hearing scheduled for April 25-April 27, 2018.
3. NHT and Tower Grove CDC filed a Joint Statement of Position with respect to the Flex Pay pilot program on April 18, 2018.
4. NHT and Tower Grove have sponsored no witnesses regarding the subject of the April 25-27 hearing, and have no further input to give on the program beyond the Joint Position Statement. NHT and Tower Grove waive their right to an opening statement and their right to cross examine witnesses during the hearing

WHEREFORE, NHT and Tower Grove respectfully submit this Motion and request that the Commission grant counsel’s request to be excused from the hearing in this case.

Respectfully Submitted,

/s/ Andrew Linhares

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ATTORNEY FOR NHT AND TOWER
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Certificate of Service

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 23rd day of April, 2018:

/s/ Andrew Linhares