BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Patricia Schuba and Deane Todd,)
Complainants,)
VS.) File No. EC-2014-0324
Union Electric Company d/b/a Ameren Missouri,)
Respondent.)

RESPONSE TO ORDER DIRECTING FILING AND PROPOSED PROCEDURAL SCHEDULE

COME NOW Union Electric Company d/b/a Ameren Missouri, on behalf of itself and all of the other parties to this case (the Staff of the Missouri Public Service Commission, the Office of the Public Counsel and Complainants Patricia Schuba and Deane Todd), by and through counsel, and hereby submits this response and proposed procedural schedule in compliance with the Commission's September 25 and October 16 *Orders Directing Filing*, as follows:

- 1. The above-referenced orders required the parties, jointly or separately, to file a proposed procedural schedule by October 17, 2014.
- 2. The parties have conferred and have agreed upon a procedural schedule, as follows:
 - Dispositive Motions to be Filed by: October 24, 2014
 - Responses to Dispositive Motions to be filed by: December 12, 2014
 - Data request Responses will be due within 10 days after service.
 - Objections to data requests or notifications of need for additional time will be due within five business days after service.

3. In the event the Commission does not rule on the Complaint on the basis of the dispositive motions by January 30, 2015, the parties propose to file, either jointly or separately, an additional proposed procedural schedule calling for pre-filed testimony, an issues list, statements of position, evidentiary hearings, briefing and any other necessary matters, and to do so by February 15, 2015. The parties request leave to forego filing such an additional procedural schedule until such time because if the Commission rules on this Complaint on the basis of the dispositive motions there will be no need for such an additional schedule.

WHEREFORE, Ameren Missouri requests that the Commission make and enter its order adopting the foregoing procedural schedule.

UNION ELECTRIC COMPANY d/b/a Ameren Missouri

Wendy K. Tatro, #62061 Director and Asst. General Counsel 1901 Chouteau Avenue P.O. Box 66149 (MC 1310) St. Louis, MO 63166-6149 (314) 554-3484 (314) 554-2514 (314) 554-4014 (FAX) AmerenMOService@ameren.com

SMITH LEWIS, LLP

/s/ James B. Lowery

James B. Lowery, #40503 111 South Ninth Street, Suite 200 P.O. Box 918 Columbia, MO 65205-0918 (573) 443-3141 (573) 442-6686 (Facsimile) lowery@smithlewis.com

Attorneys for Ameren Missouri

Dated: October 17, 2014

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have this 17th day of October 2014, served the foregoing either by electronic means, or by U. S. Mail, postage prepaid addressed to all parties of record.

James B. Lowery
James B. Lowery