

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

In the Matter of the Application of Union Electric)	Case No. EU-2012-0027
Company d/b/a Ameren Missouri for the Issuance)	
Of an Accounting Authority Order Relating to its)	
Electrical Operations.		

PROGRESS REPORT AND MOTION

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or the Company), by and through the undersigned counsel, and on the Company's behalf, and that of the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), the Missouri Industrial Energy Consumers (MIEC), and Barnes-Jewish Hospital (BJH), known collectively herein as "the Parties," files this *Progress Report and Motion* and states as follows:

1. On December 8, 2011,¹ the Parties joined in a filing by Ameren Missouri of a *Motion for Extension of Time to File Stipulation of Facts*, requesting the Commission allow until December 14 for the filing of a stipulation of facts, full or partial, or for advising the Commission that an agreement on such a stipulation of facts cannot be reached.
2. On December 9, the Commission issued its *Order Extending Time for Stipulation or Status Report (December 9 Order)*. The *December 9 Order* directed the Parties to file a stipulation of facts, or a progress report on the stipulation of facts, by December 14.
3. On December 14, the Parties joined in a filing by the Staff of a *Status Report and Motion*, requesting the Commission allow until December 22 to file a stipulation of facts, if agreement could be reached, and to recommend new dates for the filing of dispositive motions, responses and replies to dispositive motions.

¹ All dates hereafter refer to the calendar year 2011, unless otherwise specified.

4. On December 15, 2011, the Commission issued its *Order Extending Time and Directing Filing (December 15 Order)*, which ordered the Parties to file a stipulation of facts or a progress report and new proposed dates for the filing of dispositive motions, responses and replies by December 22, 2011.

5. The Parties have been unable to reach agreement on a stipulation of facts and do not believe that further discussions will allow them to reach agreement on a stipulation of facts.

6. Because of the delay in determining that a stipulation of facts could not be agreed upon, the Parties agree that the deadlines for the filing of dispositive motions, responses and replies need to be extended from those originally reflected in the *Jointly Proposed Procedural Schedule* adopted by the Commission in order to afford any party that desires to file such a motion to do so, and in order to allow sufficient time for responses and replies respecting any such motion(s). Consequently, the Parties recommend the following new dates for the filing of dispositive motions, responses and replies:

Deadline to File Dispositive Motions	January 16, 2012
Responses to Dispositive Motions	February 13, 2012
Replies to Responses to Dispositive Motions	February 27, 2012 ²

WHEREFORE, the Company, on behalf of the Parties, files this *Progress Report and Motion* and requests that the Commission modify the previously adopted procedural schedule as set forth in paragraph 6 hereof.

² The parties agree the replies and responses will be limited to the two rounds proposed herein.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ Thomas M. Byrne

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Dated: December 22, 2011

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail, to the following parties on the 22nd day of December, 2011.

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/s/ Thomas M. Byrne

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