BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of the Union Electric Company d/b/a Amer	:en)	
Missouri for Permission and Approval and a Certificate)	
Of Public Convenience and Necessity Authorizing it to)	Case No. EA-2015-0273
Construct, Install, Own, Operate, Maintain and)	
Otherwise Control and Manage Solar Generation)	
Facilities in Montgomery County, Missouri)	

THE MISSOURI INDUSTRIAL ENERGY CONSUMERS' JOINDER IN OPC'S MOTION FOR PROCEDURAL CONFERENCE AND SUGGESTIONS IN SUPPORT

Comes now the Missouri Industrial Energy Consumers ("MIEC") and joins in the Office of Public Counsel's *Motion for Procedural Conference*, filed with this Commission on July 29, 2015 and in support of the Motion states as follows:

- 1. On June 29, 2015, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed an application for a Certificate of Public Convenience and Necessity to build solar generation facilities in Montgomery County, Missouri ("Solar Project"). On June 30, 2015 the Commission issued an order establishing July 28, 2015 as the intervention deadline, and that deadline has now passed.
- 2. The MIEC has not yet taken a position to support or oppose the Solar Project. The MIEC, as well as the Commission and other parties, will benefit from a procedural schedule requiring Ameren Missouri to file sworn testimony explaining its financial analysis in support of the Solar Project. The MIEC, as well as the Commission and other parties, will benefit from a hearing on the Solar Project in the event that the MIEC or other parties disagree with the proposal to build the Solar Project.
- 3. The MIEC thus supports Public Counsel's belief that it is appropriate to convene a prehearing conference to discuss a procedural schedule for this case. Commission Rule 4 CSR 240-2.090(3) provides that any party may petition the Commission to hold a prehearing conference. At a

prehearing conference, parties may consider procedural and substantive matters which may aid in the disposition of the issues. Obviously, having Ameren Missouri file testimony in support of the Solar Project, and conducting a hearing in the event parties disagree with that testimony, is contemplated by the rule. Commission Rule 4 CSR 240-2.090(6).

WHEREFORE, the MIEC requests that the Commission convene a prehearing conference for the purpose of developing a proposed procedural schedule, including a hearing, in this case.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 30th day of July, 2015, to all parties on the Commission's service list in this case.

/s/ Edward F. Downey