

**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 Permission and)	
Approval and a Certificate of Public Convenience and)	File No. EA-2019-0021
Necessity Authorizing it to Construct a Wind Generation)	
Facility.)	

MOTION TO DELAY EVIDENTIARY HEARING

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and for its motion to delay the commencement of the evidentiary hearing by one day, states as follows:

1. On February 11, 2019, all parties except the Counties¹ filed (or indicated they did not oppose) a Second Stipulation and Agreement ("Second Stipulation") that, but for issues raised by the Counties, would resolve this case if approved by the Commission.

2. As a result of the Second Stipulation, the issues in this case have been significantly narrowed and reduced, as has the likelihood of extensive cross-examination of most of the parties' witnesses. Consequently, it is a near certainty that the full four days currently allotted for the evidentiary hearing will not be required; indeed, it appears likely that the hearing could be concluded in two days, even if the Counties' issues were to remain unresolved.

3. The Company and the Counties have continued to discuss the possibility of resolving the Counties' issues and have reached an agreement in principle on such a resolution. That agreement needs to be reduced to writing and discussed with the other parties to the case. Given the closeness of the currently-scheduled date for the hearings to begin, the State Holiday

¹ Unless otherwise specified, references to the "Counties" are to Atchison County, DeKalb County, the Tarkio R-1 School District, the Rock Port R-2 School District, and the Fairfax R-3 School District, collectively.

on Monday, February 18, and the remaining work to be done to seek to finalize the settlement in principle, the Company requests the Commission to enter its order delaying the start of the hearing to 8:30 a.m., Wednesday, February 20, 2019.

4. The Company polled all the parties on Friday afternoon, February 15, 2019, and as of the time of filing this motion, all parties that have responded have indicated that they do not oppose the one-day delay (all parties except MIEC and Renew Missouri responded; MIEC and Renew Missouri may not have seen the e-mail given the proximity to the weekend when it was sent and the possibility their offices closed early due to the weather conditions Friday afternoon).

WHEREFORE, the Company requests that the Commission enter its order delaying the start of the evidentiary hearing to 8:30 a.m., Wednesday, February 20, 2019.

Respectfully submitted,

s/ James B. Lowery

James B. Lowery, Mo. Bar #40503

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

Dated: February 16, 2019

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to counsel of record this 16th day of February, 2018.

/s/ James B. Lowery

James B. Lowery