

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

Ann S. Crenshaw,	)	
Complainant,	)	
	)	
vs.	)	Case No: EC-2014-0178
	)	
Union Electric Company, d/b/a	)	
Ameren Missouri,	)	
Respondent.	)	

**REQUEST FOR MEDIATION AND STAY**

COMES NOW, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri” or “Company”), and for its Request for Mediation and Stay states as follows:

1. On December 6, 2013, Complainant initiated this proceeding against Company.
2. On December 10, 2013, the Commission entered its Notice of Complaint and Information for Complainant, ordering Ameren Missouri to file a response to the Complaint no later than January 9, 2014.
3. Ameren Missouri believes that given the particular issues and concerns raised in the Complaint, the Complaint might be resolved sooner and more efficiently through early participation in mediation, rather than proceeding with the formal complaint process.
4. Subsection (B) of 4 CSR 240-2.125(2) provides that, “[a]s the Commission deems appropriate, or upon a request for mediation, the commission may appoint a presiding officer assigned to the case to mediate the dispute.” Subsection (C) provides, “[a]ll other actions on the case shall cease and all time limitations shall be tolled pending the completion of mediation process, except as otherwise provided by law.”

WHEREFORE, Ameren Missouri respectfully requests that the Commission order:

- (a) that the parties participate in a mediation of the Complaint, and
- (b) that the time for Ameren Missouri to file its answer to the Complaint be stayed until a reasonable time after the completion of the mediation process.

SMITH LEWIS, LLP

/s/ Sarah E. Giboney

Sarah E. Giboney, #50299  
111 South Ninth Street, Suite 200  
P.O. Box 918  
Columbia, MO 65205-0918  
(573) 443-3141  
(573) 442-6686 (Facsimile)  
giboney@smithlewis.com

By: /s/ Wendy K. Tatro

**Wendy K. Tatro**, # 60261  
Corporate Counsel  
Ameren Services Company  
P.O. Box 66149  
St. Louis, MO 63166-6149  
(314) 554-3484 (phone)  
(314) 554-4014 (fax)  
[AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

Attorneys for Ameren Missouri

### **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Request for Mediation and Stay was served on the following parties via electronic mail (e-mail) or via certified and regular mail on this 30<sup>th</sup> day of December, 2013.

Nathan Williams, Deputy Staff Counsel  
Whitney Hampton Associate Staff Counsel  
Missouri Public Service Commission  
200 Madison Street, Suite 800  
P.O. Box 360  
Jefferson City, MO 65102  
[Nathan.williams@psc.mo.gov](mailto:Nathan.williams@psc.mo.gov)  
[Whitney.hampton@psc.mo.gov](mailto:Whitney.hampton@psc.mo.gov)

Lewis Mills  
Office Of Public Counsel  
200 Madison Street, Suite 650  
P.O. Box 2230  
Jefferson City, MO 65102  
[opcservice@ded.mo.gov](mailto:opcservice@ded.mo.gov)  
[Lewis.mills@ded.mo.gov](mailto:Lewis.mills@ded.mo.gov)

Ann S. Crenshaw  
8727 Northcrest Lane  
St. Louis, MO 63147

/s/ Sarah E. Giboney

Sarah E. Giboney