

**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-2018-0202
Necessity Authorizing it to Construct a Wind Generation)
Facility.)

**LIST OF ISSUES, ORDER OF WITNESSES,
ORDER OF CROSS-EXAMINATION, AND
ORDER OF OPENING STATEMENTS**

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), on behalf of the parties, and submits this List of Issues, Order of Witnesses, Order of Cross-Examination, and Order of Opening Statements, as follows:

BACKGROUND

1. Pursuant to paragraph 15 of the Third Stipulation and Agreement ("Third Stipulation") filed in this case on October 12, 2018 and assuming the Third Stipulation is approved by the Commission, there remains one issue dealing with whether the 15% of return and depreciation that will not be recorded to the regulatory asset provided for by Section 393.1400.2, RSMo. can be included in the Renewable Energy Standard Rate Adjustment Mechanism ("RESRAM") the parties¹ have agreed should be approved in this docket. The Third Stipulation further provides that the resolution of that issue will be on the basis of the pre-filed testimony on

¹ All parties have agreed that a RESRAM should be approved; Sierra Club does not oppose that agreement.

file in this docket, an evidentiary hearing, and post-hearing briefing.

2. Four witnesses pre-filed testimony on this issue, as follows: Dr. Geoff Marke for the Office of the Public Counsel (“OPC”), Mr. Tom Byrne and Mr. Steve Wills for Ameren Missouri, and Ms. Jamie Myers for the Staff.²

LIST OF ISSUES

Does Ameren Missouri’s election under Section 393.1400.5, RSMo, on September 1, 2018, which under Section 393.1400.2 requires that 85% of depreciation expense and return on the High Prairie project be deferred to a regulatory asset preclude the inclusion of 15% of said depreciation and return in Ameren Missouri’s RESRAM?

ORDER OF WITNESSES

Ameren Missouri

Mr. Steve Wills
Mr. Tom Byrne

Staff

Ms. Jamie Myers

OPC

Dr. Geoff Marke

² Mr. Jason Kunst filed testimony on accounting issues related to the RESRAM, but does not address the substance of the issue.

ORDER OF CROSS-EXAMINATION

OPC WITNESSES	AMEREN MISSOURI WITNESSES	STAFF WITNESSES
Staff	Staff	Ameren Missouri
Ameren Missouri	OPC	OPC

ORDER OF OPENING STATEMENTS

Ameren Missouri

Staff

OPC

WHEREFORE, Ameren Missouri on behalf of the parties prays that the Commission accept the foregoing in compliance with the Commission's October 15, 2018 *Order Modifying Procedural Schedule*.

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: October 16, 2018.

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 October, 2018.

/s/ James B. Lowery _____

James B. Lowery