

**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.)	

SECOND MOTION TO DELAY EVIDENTIARY HEARING

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), and for its second 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 were significantly narrowed and reduced, as was the likelihood of extensive cross-examination of most of the parties' witnesses.

3. As indicated in the first Motion to Delay the Evidentiary Hearing filed on February 16, 2019 (granted by the Presiding Officer by dated February 17, 2019), the Company and the Counties, which were the only parties raising any objection to the Company's Application after the Second Stipulation had been filed, have continued to discuss the possibility of resolving the Counties' issues and have now reached an agreement (which has been reduced to writing) on such a resolution. The agreement with the Counties will be reflected in a Third

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.

Stipulation and Agreement (“Third Stipulation”) which the Company expects to be filed Wednesday morning, February 20, 2019. A draft of the Third Stipulation has been circulated to all parties and all parties except one have indicated that they will sign it or that they do not oppose it.² Consequently, no contested issues remain for resolution by the Commission.

4. Given the foregoing, the Company files this motion to request that the Commission delay the start of the evidentiary hearing another day, to 8:30 a.m. Thursday, February 21, 2019, pending submission of the Third Stipulation.

WHEREFORE, the Company requests that the Commission enter its order delaying the start of the evidentiary hearing to 8:30 a.m., Thursday, February 21, 2019.

Respectfully submitted,

s/ James B. Lowery

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

Dated: February 19, 2019

² The one party who has not been able to review the draft Third Stipulation is MIEC, whose attorney is travelling today. MIEC’s counsel has indicated that he does not expect to have an objection. In the extremely unlikely event there were an objection, two days beyond tomorrow remain available for hearing which would almost certainly be sufficient to conclude any necessary hearing.

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 19th day of February, 2018.

/s/ James B. Lowery

James B. Lowery