

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) **File No. EO-2015-0055**
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA)

SIERRA CLUB’S MOTION TO BE EXCUSED FROM HEARING

Comes now Sierra Club and respectfully requests to be excused from the upcoming evidentiary hearing in the above-captioned proceeding. In support of its motion, Sierra Club states as follows:

1. On December 22, 2014, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application seeking approval of a second cycle of demand-side programs under the Missouri Energy Efficiency Investment Act, including a demand-side investment mechanism (“Cycle 2 Plan”).
2. Sierra Club was granted intervention on January 21, 2015, and actively participated in the case concerning Ameren Missouri’s Cycle 2 Plan.
3. On February 10, 2016, the Commission approved Ameren Missouri’s Cycle 2 Plan, as amended by the Non-Unanimous Stipulation and Agreement filed on February 5, 2016.
4. On November 30, 2017, Ameren Missouri filed an application for approval of a flex pay pilot program and associated variances.
5. Sierra Club has not sponsored a witness concerning Ameren Missouri’s pilot program application and does not plan to provide an opening statement or conduct cross examination of any witnesses at the hearing.¹

¹ Sierra Club is submitting a brief Statement of Position, concurrent with this motion.

6. Sierra Club respectfully requests permission to be excused from the upcoming hearing on the pilot program, scheduled for April 25-27, 2018.

Dated this 18th day of April, 2018.

Respectfully submitted,

/s/ Jill Tauber

Jill Tauber

Admitted *Pro Hac Vice*

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct PDF version of the foregoing was filed on EFIS and electronically mailed to all counsel of record on this 18th day of April, 2018.

/s/ Jill Tauber
Jill Tauber