

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

In the Matter of the Union Electric Company d/b/a)
Ameren Missouri’s Tariffs to Decrease Its) File No. ER-2019-0335
Revenues for Electric Service)

**PUBLIC COUNSEL’S REPLY TO AMEREN MISSOURI’S RESPONSE IN
OPPOSITION TO PUBLIC COUNSEL’S MOTION TO AMEND PROCEDURAL
SCHEDULE**

The Office of the Public Counsel (OPC) provides its Reply to Ameren Missouri’s Response in Opposition to Public Counsel’s Motion to Amend Procedural Schedule as follows:

1. Union Electric Company d/b/a Ameren Missouri’s Response expounds in seven pages as to how the OPC should be expected to operate under the currently ordered procedural schedule, and the supposed unreasonableness of the OPC’s request.

2. As a reminder, OPC’s request is merely for one more business day for the filing of surrebuttal testimony, and accordingly moving the filing deadline for an issues list to provide parties with two business days to review said testimony.

3. Ameren Missouri’s insistence that the OPC should be satisfied with one less business day to file surrebuttal testimony actually undercuts its own position. If the loss of day is reasonable and no harm to the OPC, then conversely Ameren Missouri should have no reason to complain about the same amount of time in the opposite direction.

4. Furthermore, Ameren Missouri claims that “OPC’s proposed change would make it practically impossible to properly and timely develop the required List of Issues, Order of Witnesses, and Order of Cross-Examination (collectively, “Issues List”), which would be due on the *same day* OPC wants to file surrebuttal testimony.” The current schedule makes the List of Issues due the business day following the business day when surrebuttal and true-up testimonies

are due. Contrary to Ameren Missouri's assertion, the OPC's Motion asks for the following schedule, providing two business days between the filing of testimony and the List of Issues:

All Parties' Surrebuttal and True-up Testimony	February 18, 2020
List of Issues, Order of Witnesses, Order of Cross Examination	February 20, 2020

WHEREFORE, the OPC submits its Reply.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Caleb Hall
Caleb Hall, #68112
Senior Counsel
200 Madison Street, Suite 650
Jefferson City, MO 65102
P: (573) 751-4857
F: (573) 751-5562
Caleb.hall@opc.mo.gov

**Attorney for the Office of the Public
Counsel**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this 6th Day of February, 2020 with notice of the same being sent to all counsel of record.

/s/ Caleb Hall