

**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 Motion to Amend Procedural Schedule**

The Office of the Public Counsel (OPC), by and through and counsel, moves to amend the procedural schedule as follows:

1. The OPC joined in Union Electric d/b/a Ameren Missouri's Joint Motion to Amend Procedural Schedule filed on January 31, 2020. The Joint Motion asks the Commission to approve a schedule change for several items including the provision of true-up revenue requirement data and a settlement conference. Based on discussions with Ameren Missouri and the Staff of the Public Service Commission (Staff), the OPC found the Motion reasonable and agreed with the parties that it could facilitate more productive settlement discussions.

2. Before the filing of the Joint Motion, the OPC also previously agreed to another schedule change for the settlement conference for similar reasons.

3. The OPC welcomes schedule changes in order to furnish the most accurate data possible while discussing settlement, but these schedule changes will interfere with OPC's internal scheduling commitments and preparations for surrebuttal testimony.

4. Besides press of business, the OPC is also cognizant that the historical practice of settlement conferences is that discussions may continue far beyond a scheduled conference. The Joint Motion asks for the settlement conference to be held on February 7, 2020, while the filing deadline for surrebuttal testimony remains on February 14, 2020. If discussions continue past that deadline, as they have previously, then time will be limited to refine surrebuttal testimony in time

for filing. Focusing alternatively on surrebuttal may undermine fruitful settlement that could otherwise be developed over the week beginning February 10, 2020.

5. Surrebuttal testimony is due for filing on February 14, 2020, and an issues list is due February 18, 2020.

6. In order to foster more productive settlement discussions, while also alleviating press of business, the OPC asks that the Public Service Commission amend the currently ordered procedural schedule as follows:

All Parties' Surrebuttal and True-up Testimony February 18, 2020

List of Issues, Order of Witnesses, Order of Cross Examination February 20, 2020

All parties provide valuation of their positions to Staff for The Final Reconciliation February 20, 2020

7. These adjustments should have no impact on the remaining procedural schedule items.

**WHEREFORE**, the OPC moves to amend the procedural schedule.

Respectfully,

**OFFICE OF THE PUBLIC COUNSEL**

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**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 31<sup>st</sup> Day of January, 2020, with notice of the same being sent to all counsel of record.

/s/ Caleb Hall