

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

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

STAFF'S MOTION FOR LEAVE TO FILE SUPPLEMENTAL DIRECT TESTIMONY

COMES NOW the Staff of the Missouri Public Service Commission (Staff) and, because of the magnitude of the impact and to give other parties an opportunity to respond in rebuttal testimony, moves the Commission for leave to file supplemental direct testimony of Staff witness Sarah L.K. Lange to revise the recommended rates contained in Staff's Class Cost of Service Report. Due to an internal miscommunication concerning the treatment of the temporary tax rider, the rates reflected in the CCoS Report recover more revenue than Staff auditors have calculated for Ameren Missouri's retail cost of service. The revision has the effect of decreasing the revenue responsibilities of the classes, and thus decreasing Staff's recommended rates. Staff will also provide updated workpapers supporting the revisions.

WHEREFORE, Staff prays the Commission will grant it leave to file the attached supplemental direct testimony.

Respectfully submitted,

/s/ Nicole Mers
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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 9th day of January, 2020, to all counsel of record.

/s/ Nicole Mers