

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

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

**MOTION FOR EXPEDITED TREATMENT
OF A NON-UNANIMOUS STIPULATION AND
AGREEMENT RESOLVING ALL ISSUES AND
TARIFF SHEETS IMPLEMENTING THAT STIPULATION AND AGREEMENT**

Under authority of and in accordance with 4 CSR 240-2.080, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri” or “the Company”) asks the Commission for expedited approval of a non-unanimous stipulation and agreement the Company filed February 5, 2016, and tariff sheets implementing portions of that stipulation filed the same date. Ameren Missouri states the following in support of its motion.

1. On February 5, 2016, Ameren Missouri filed a Non-Unanimous Stipulation and Agreement (“Stipulation”) that, if approved by the Commission, will resolve all issues related to the Company’s MEEIA Cycle 2 Plan. All parties to this case, with the exception of Kansas City Power and Light Company and KCP&L Greater Missouri Operations, are either signatories to the Stipulation or have stated to Ameren Missouri they do not oppose the Stipulation. Kansas City Power and Light Company and KCP&L Greater Missouri Operations will file a separate pleading explaining its position by February 8.

2. The Stipulation obligates the Company to use its best efforts to implement MEEIA Cycle 2 programs no later than March 1, 2016. The Stipulation specifies this date because in order to meet specified energy and demand savings goals Ameren Missouri must

implement its programs as quickly as possible. This is especially true for business and residential HVAC programs, the savings from which will greatly affect the Company's ability to meet specified demand savings goals. To pursue and exploit the full potential of MEEIA Cycle 2 programs designed to reduce energy consumption and demand from HVAC systems, Ameren Missouri must implement those programs as far in advance of the 2016 air conditioning season as possible. Ameren Missouri believes unless the Commission approves the Stipulation before March 1, 2016, the Company will not be able to achieve stipulated energy savings goals, because any delay beyond that date will result in lost opportunities to timely promote and incentivize customers to install energy efficient HVAC systems.

3. Appendix D of the Stipulation contains exemplar tariff sheets necessary to implement portions of agreed upon MEEIA Cycle 2 programs. Ameren Missouri filed actual tariff sheets identical to those exemplars contemporaneously with this filing, along with a motion for expedited approval of the Stipulation, asking the Commission to approve tariff sheets necessary to implement the Cycle 2 MEEIA programs before March 1, 2016. The reasons the Company requires expedited approval of these tariff sheets are stated in the preceding paragraph. Approving the Stipulation without simultaneously approving required tariff sheets will prevent the Company from timely implementing its MEEIA programs.

4. Good cause exists to grant the relief sought in this motion. Failure to approve both the Stipulation and tariff sheets necessary to implement prior to March 1, 2016, will delay implementation of all MEEIA Cycle 2 programs. Such delay will hamper Ameren Missouri's ability to maximize energy and demand savings during 2016, and may jeopardize the Company's ability to achieve demand savings goals tied to energy efficient HVAC systems. Preventing Ameren Missouri from achieving the energy savings objectives specified in the Stipulation will

deny all signatories a key benefit of the bargain they struck. Moreover, no party to this case will be adversely affected if expedited treatment is granted, because all parties are either signatories to the Stipulation, have stated they do not object to its approval, or will file a separate pleading explaining its position by February 8, 2016.

WHEREFORE, for the reasons stated above Ameren Missouri requests the Missouri Public Service Commission issue an order on or before March 1, 2016, approving the Non-Unanimous Stipulation and Agreement and all tariff sheets necessary to implement its terms.

/s/ L. Russell Mitten

L. Russell Mitten, #27881
BRYDON, SWEARENGEN & ENGLAND, P.C.
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102-0456
(573) 635-7166 (Telephone)
(573) 634-7431 (Facsimile)
rmitten@brydonlaw.com

Wendy K. Tatro, #60261
Director and Assistant General Counsel
Matt Tomc, #66571
Associate General Counsel
1901 Chouteau Avenue,
P.O. Box 66149, MC-1310
St. Louis, Missouri 63101-6149
(314) 554-4673 (Telephone)
(314) 554-4014 (Facsimile)
amerenmoservice@ameren.com

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

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served via e-mail on counsel for all parties of record on this 5th day of February, 2016.

/s/ L. Russell Mitten