

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

In the Matter of the Application of Union Electric)
Company d/b/a Ameren Missouri for Permission and)
Approval and a Certificate of Public Convenience and)
Necessity Authorizing it to Construct a Wind Generation)
Facility.)
File No. EA-2019-0021

**LIST OF ISSUES, ORDER OF WITNESSES, ORDER OF
CROSS-EXAMINATION, AND ORDER OF OPENING STATEMENTS**

COME NOW Union Electric Company, d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), Renew Missouri Advocates ("Renew Missouri"), the Missouri Industrial Energy Consumers ("MIEC"), the Missouri Department of Economic Development – Division of Energy ("Division of Energy"), the Missouri Department of Conservation ("MDC"), the Natural Resources Defense Council ("NRDC"), and the Sierra Club, and in compliance with the Commission's November 15, 2018 *Order Adopting Procedural Schedule* hereby submits this List of Issues, Order of Cross-Examination, and Order of Opening Statements, as follows:

LIST OF ISSUES

- 1. *Should the Commission grant the certificate of convenience and necessity ("CCN") and merger approval sought by the Company's application in this docket or reject it?***

- 2. *If the Commission approves the CCN and merger approval sought by the Company's application in this docket, what conditions, if any, should the Commission impose?***

ORDER OF WITNESSES

Ameren Missouri

Tom Byrne¹
Matt Michels
Joe LaMacchia
Ajay Arora

Staff

Claire Eubanks
Shawn Lange
Cedric Cunigan
David Murray
Jason Kunst
Jamie Myers

Renew Missouri

James Owen

Missouri Division of Energy

Martin Hyman

Tarkio R-1 School District

Karma Coleman

Missouri Department of Conservation

Jennifer Campbell
Dr. Janet Haselrig

¹ Mr. Byrne is available on February 19 until 1:30 p.m. If his testimony cannot be completed by 1:30 p.m. Mr. Byrne can appear for cross-examination on February 20.

Atchison County

Susette Taylor
Lori Jones

DeKalb County

Tanya Zimmerman
Melissa Meek

ORDER OF CROSS-EXAMINATION

AMEREN MISSOURI WITNESSES	COUNTIES' WITNESSES	SCHOOL DISTRICTS' WITNESSES
Staff	Fairfax R-2 School District	Counties
Renew Missouri	Tarkio R-1 School District	MDC
Division of Energy	Rock Port R-1 School District	OPC
NRDC	MDC	MIEC
Sierra Club	OPC	Renew Missouri
MIEC	MIEC	Division of Energy
OPC	Division of Energy	NRDC
Rock Port R-1 School District	Renew Missouri	Sierra Club
Tarkio R-1 School District	NRDC	Staff
Fairfax R-2 School District	Sierra Club	Ameren Missouri
MDC	Staff	
Counties	Ameren Missouri	
MDC WITNESSES	DIVISION OF ENERGY WITNESSES	RENEW MISSOURI WITNESSES
Rock Port R-1 School District	Renew Missouri	Division of Energy
Tarkio R-1 School District	NRDC	NRDC
Fairfax R-2 School District	Sierra Club	Sierra Club
Counties	Ameren Missouri	Ameren Missouri
OPC	Staff	Staff
MIEC	MIEC	MIEC
Division of Energy	MDC	MDC
NRDC	OPC	OPC
Sierra Club	Rock Port R-1 School District	Rock Port R-1 School District
Staff	Tarkio R-1 School District	Tarkio R-1 School District
Ameren Missouri	Fairfax R-2 School District	Fairfax R-2 School District
	Counties	Counties
STAFF WITNESSES		
Ameren Missouri		
NRDC		
Sierra Club		

Renew Missouri		
Division of Energy		
MIEC		
OPC		
MDC		
Rock Port R-1 School District		
Tarkio R-1 School District		
Fairfax R-2 School District		
Counties		

ORDER OF OPENING STATEMENTS

Ameren Missouri

Staff

Renew Missouri

Division of Energy

NRDC

Sierra Club

MIEC

OPC

School Districts

MDC

Counties

WHEREFORE, the parties pray that the Commission accept the foregoing in compliance with the Commission's November 15, 2018 *Order Adopting Procedural Schedule*.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
SMITH LEWIS, LLP
P. O. Box 918
Columbia, MO 65205
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com

/s/ Wendy K. Tatro

Wendy K. Tatro, Mo. Bar #60261
Director & Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue, MC 1301
St. Louis, MO 63103
(T) (314) 554-3484
(F) (314) 554-4014
AmerenMOService@ameren.com

**Attorneys for Union Electric Company
d/b/a Ameren Missouri**

/s/ Lewis Mills

Lewis Mills, Mo. Bar #35275
221 Bolivar St., Ste. 101
Jefferson City, MO 65102
(T) 573-556-6627
(F) 573-556-7447
Lewis.mills@bclplaw.com

/s/ Nicole Mers

Nicole Mers, Mo. Bar #66766
Staff Counsel
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102
(T) 573-751-6651
(F) 573-751-9285

Nicole.mers@psc.mo.gov

**Attorney for the Staff of
Missouri Public Service Commission**

/s/ Tim Opitz

Tim Opitz, Mo. Bar #65082
409 Vandiver Dr., Bldg. 5, Ste. 205
Columbia, MO 65202
(T) 573-303-0394, Ext. 3
(F) 573-303-5633
tim@renewmo.org

Attorney for Renew Missouri

/s/ Henry B. Robertson

Henry B. Robertson, Mo Bar #29502
319 N. Fourth St., Suite 800
St. Louis, MO 63102
(T) 314-231-4181
(F) 314-231-4184
hrobertson@greatriverslaw.org

**Attorney for Natural Resources
Defense Council**

/s/ Diana M. Vuylsteke

Diana M. Vuylsteke, Mo. Bar #42419
221 N. Broadway, Ste. 3600
St. Louis, MO 63012
(T) 314-259-2543
(F) 314-259-2020
dmvuylsteke@bclplaw.com

***Attorneys for Missouri Industrial
Energy Consumers***

/s/ Stephanie S. Bell

Marc H. Ellinger, Mo. Bar #40828
Stephanie S. Bell, Mo. Bar #61855
308 East High Street, Suite 300
Jefferson City, MO 65101
(T) 573-750-4100
mellinger@ellingerlaw.com
sbell@ellingerlaw.com

***Attorneys for Missouri Department
Of Conservation***

s/ Henry B. Robertson

Henry B. Robertson, Mo Bar #29502
319 N. Fourth St., Suite 800
St. Louis, MO 63102
(T) 314-231-4181
(F) 314-231-4184
hrobertson@greatriverslaw.org

Attorney for Sierra Club

Dated: February 6, 2019.

/s/ Rochelle L. Reeves

Rochelle L. Reeves, Mo. Bar #51058
PO Box 1157
Jefferson City, MO 65102
(T) 573-526-2423
reeves.deenergycases@ded.mo.gov

Attorney for Missouri Division of Energy

/s/ Ryan Smith

Ryan Smith, Mo. Bar #66244
John Clizer, Mo. Bar #69043
PO Box 2230
200 Madison Street, Suite 650
Jefferson City, MO 65102
(T) 573-751-4857
(F) 573-751-5562
ryan.smith@ded.mo.gov
john.clizer@ded.mo.gov

Attorney for Office of the Public Counsel

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to counsel of record this 6th day of February, 2018.

/s/ James B. Lowery _____

James B. Lowery