

The Staff of the Missouri Public Service Commission,

Complainant,

VS.

Union Electric Company d/b/a
Ameren Missouri,

Respondent.

Case No. EC-2015-0315

MOTION TO MODIFY PROCEDURAL SCHEDULE

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), by and through counsel, and hereby, with the concurrence of the other parties to this docket, respectfully moves to modify the Procedural Schedule adopted by order dated July 30, 2015 and, as reasons therefor, states as follows:

1. After the prehearing conference held in this case, the parties to this docket discussed and agreed upon a proposed procedural schedule which had contemplated that both the Staff and Ameren Missouri (and any other party who desired to do so) would each file cross-summary determination motions seeking a ruling on this complaint as a matter of law. The parties contemplated that Ameren Missouri would not file its motion until August 28, 2015.

2. However, the proposed schedule that was filed did not literally reflect the parties' intention that cross-motions for summary determination would be filed, and instead, on its face, suggested that only one motion would be filed with later responses to that motion and a reply by the movant.

3. To remedy the issue, and to afford the parties sufficient time to prepare their motions, the parties have agreed that the procedural schedule, as modified, should be as follows:

Cross-Motions for Summary Determination

August 28, 2015

Responses to Cross-Motions for Summary Determination

September 16, 2015

Replies to Responses to
Cross-Motions for Summary Determination
Oral Argument

September 23, 2015

October 2, 2015

The parties also propose that the Commission adopt a procedure regarding data requests of five days for response and three days for objection to the data request. The abbreviated nature of this proposed procedural schedule is due to the fact that the parties to this proceeding do not dispute the facts relating to this complaint; rather, they dispute the proper interpretation of the Commission's rules.

WHEREFORE, the Company, with the concurrence of the other parties to this docket, prays that the Commission enter its order modifying the current procedural schedule to reflect the schedule set forth herein; and grant such other and further relief as the Commission considers just in the circumstances.

Respectfully Submitted,

/s/ James B. Lowery

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Dated: August 4, 2015

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 4th day of August, 2015, to all counsel of record.

/s/James B. Lowery