

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

In the Matter of the Application of)	
Union Electric Company for Authority)	
To Continue the Transfer of)	File No. EO-2011-0128
Functional Control of Its Transmission)	
System to the Midwest Independent)	
Transmission System Operator, Inc.)	

**JOINT MOTION TO MAKE ADDITIONAL MODIFICATIONS TO
APRIL 19, 2012 REPORT AND ORDER**

COMES 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”) and the Missouri Industrial Energy Consumers (“MIEC”), by and through counsel, and hereby request the Commission to make additional modifications to its April 19, 2012, *Report and Order*¹ in this case and, as reasons for their request, state as follows:

1. On April 19, 2012, the Commission issued its *Report and Order* in this case resolving the Company’s third Commission proceeding through which the Company sought authority to participate, and continue its participation, as a transmission-owning member of the

¹ In the Commission’s April 19, 2012, *Report and Order* the Ordering Paragraphs of note are in Ordering Paragraph 2. In the Commission’s May 17, 2012, *Order Granting Ameren Missouri’s Motion to Clarify Report and Order* the Ordering Paragraphs of note are in Ordering Paragraph 2.2. In the Commission’s December 22, 2014 *Order Modifying 2012 Report and Order (“First Modification Order”)*, the Ordering Paragraphs of note are in Ordering Paragraph 1.2. Ordering Paragraphs 2.A, 2.2.A, and 1.2.A to 2.S, 2.2.S, and 1.2.S address the very same subject matter. For purposes of brevity, this pleading will refer to just the alphanumeric for the appropriate Ordering Paragraph: “Ordering Paragraph 2_.”

The Commission’s April 19, 2012, *Report and Order* set out all Ordering Paragraphs of Ameren Missouri’s authorization to participate in MISO. Ordering Paragraphs 2.B, 2.E, and 2.G, of the Commission’s April 19, 2012, *Report and Order* were clarified by the Commission’s May 17, 2012, *Order Granting Ameren Missouri’s Motion to Clarify Report and Order*, which also added Ordering Paragraph 2.T (defines the term “Stakeholders”) and Ordering Paragraph 2.U (addresses “highly confidential” and “proprietary” information). For clarity regarding the documents being referred to, please see the list of documents (including clarification motion and clarification order, and modification motion and modification order) listed in Attachment A to this pleading.

Midcontinent Independent System Operator, Inc.² (“MISO”).³ As in each of its prior MISO participation cases, the April 19, 2012, *Report and Order* required that the Company initiate a subsequent case respecting its continued participation by a date certain (November 15, 2015), and imposed certain other conditions relating to cost-benefit studies and the continuation of the terms of a Service Agreement by and between Ameren Missouri and MISO, which was approved by both the Commission and the Federal Energy Regulatory Commission (“FERC”) as part of Ameren Missouri’s initial MISO participation case, Case No. EO-2003-0271.

2. On November 24, 2014, the Joint Movants filed a joint motion and on November 26, 2014 an amended joint motion⁴ asking the Commission to modify the April 19, 2012, *Report and Order* to delay the filing of a new case to November 15, 2017 (the “*First Motion to Modify*”). The *First Motion to Modify* did not repeat the Ordering Paragraphs of the Commission’s April 19, 2012, *Report and Order*, showing as modified the Ordering Paragraphs the Signatories proposed the Commission modify and as unchanged the Ordering Paragraphs the Signatories proposed the Commission not change. The Signatories set out the reasons for their request for modification and the specific modifications for the specific Ordering Paragraphs of the April 19, 2012, *Report and Order*. By its December 22, 2014, *Order Modifying 2012 Report and Order* (“*First Modification Order*”), the Commission sustained the First Motion to Modify and modified the April 19, 2012, *Report and Order* so that it stated the Ordering Paragraphs modified, as specified, with particularity, on pages 3 through 7 of the *First Modification Order*.

² Formerly known as the Midwest Independent Transmission System Operator, Inc.

³ The Commission first approved the Company’s participation in MISO in Case No. EO-2003-0271, and subsequently approved its continued participation in Case No. EO-2008-0134, and in this case.

⁴ Joint Motion of Ameren Missouri, the Staff, the Office of the Public Counsel, and the Missouri Industrial Energy Consumers to Modify April 19, 2012 Report and Order filed on November 24, 2014. Amendment to Joint Motion of Ameren Missouri, the Staff, the Office of the Public Counsel, and the Missouri Industrial Energy Consumers to Modify April 19, 2012 Report and Order filed on November 26, 2014.

After Ordering Paragraph T, the *First Modification Order* stated: “All other provisions of the 2012 Report and Order are unchanged and remain in effect.” Essentially, the *First Modification Order* continued all the terms of Ameren Missouri’s MISO participation for an additional two years.

3. As required by the April 19, 2012, *Report and Order* as modified by the *First Modification Order*, in September of this year the Company convened a meeting of Stakeholders as required by Ordering Paragraphs 2 and 3 of the *First Modification Order*. Because of that meeting, an additional meeting held in October of this year, and further discussion thereafter, and based upon information provided by Ameren Missouri, the Joint Movants agreed it would be appropriate to ask the Commission to further modify the April 19, 2012, *Report and Order* to delay the filing of a new case to March 15, 2020, with all the current terms and conditions of the April 19, 2012, *Report and Order*, as it was modified by the *First Modification Order*, to remain in place, except as specifically modified by Commission order pursuant to this Joint Motion. The bases for the agreement of the Joint Movants to request an extension of the filing of a new case are outlined below. (See Attachment A for a summary of the proposed modified dates for events of particular note.)

4. Ameren Missouri reported that performing a cost-benefit study with the scope and parameters contemplated by Ameren Missouri and the Stakeholders would likely cost a minimum of \$500,000 and more likely closer to \$1 million. Ameren Missouri further indicated that these amounts represent an estimate of the external costs Ameren Missouri would incur to have the study performed, and do not include Ameren Missouri’s own internal labor or resource costs, nor any costs Stakeholders would incur relating to such a study. Ameren Missouri stated that this estimate is based upon the cost of the last comprehensive cost-benefit study that was

completed several years ago, which at that time cost approximately \$481,000. Among the items identified by Ameren Missouri that would significantly add to the scope of a new study were that the new study would cover a range of years twice as long as the period covered by the earlier study (ten (10) years instead of five (5) years), the RTO markets to be studied are more complex than they were at the time of the original study (co-optimizing energy and ancillary service markets), and the study would have to examine multiple Clean Power Plan compliance scenarios.

5. In addition, Ameren Missouri indicated that there are good reasons to believe that incurring the high cost of such a study is not currently justified, and has identified the following primary reasons:

- a. Ameren Missouri indicated that the Southwest Power Pool (“SPP”) does not have a centrally administered capacity market, while MISO has such a capacity market from which Ameren Missouri has captured substantial margins in recent years. Ameren Missouri further indicated that the bilateral capacity market in SPP lacks both depth and transparency.
- b. Ameren Missouri reported that MISO has indicated to it that if Ameren Missouri were to exit, Ameren Missouri would owe MISO a lump-sum exit fee of approximately \$22 million, as required by MISO’s FERC-approved tariff. Ameren Missouri indicated the exit fee would be required to cover Ameren Missouri’s share of MISO’s existing infrastructure used to operate the Regional Transmission Organization (“RTO”).
- c. Ameren Missouri indicated that under MISO’s FERC-approved tariff, a member who exits MISO remains obligated to pay its pro-rata share of transmission charges to cover already-approved MISO Multi-Value Projects (“MVPs”), which Ameren

- Missouri has estimated would total \$63-\$66 million per year.⁵ Ameren Missouri further estimated that its total MVP obligations would be approximately \$2.2 billion over the next 40 years, which Ameren Missouri indicated is a period that approximates the depreciable life of the MVP projects.
- d. Ameren Missouri also indicated that the current exit study results, from MISO's 2014 Transmission Expansion Plan that indicates the benefit-cost ratio of MISO participation for MISO Zone 5 (which is made up almost entirely of Ameren Missouri's service territory) is between 2.3 and 3.3. Ameren Missouri stated that if it were to exit MISO, it would have to incur substantial additional costs in the form of transmission service charges to access those benefits⁶, in addition to the aforementioned sums Ameren Missouri indicated it would owe.
- e. Ameren Missouri indicated that it understands that if it were to leave MISO and join SPP, it would be responsible for an allocation of the transmission charges arising from already built/approved SPP transmission projects, the costs of which (similar to MISO MVPs), are allocated regionally, while also owing its pro-rata share of the MISO MVP transmission charges.
- f. Ameren Missouri indicated that if it were to exit MISO and join SPP, its Illinois generating assets located in MISO Zone 4 (essentially, Southern Illinois) would remain in MISO, unless it incurred significant costs to either "pseudo tie" one or more of these assets to SPP. Absent such an arrangement (or a similarly costly

⁵ During the approximately 3-year extension period (2019 - 2021). These years are identified because without the extension requested by this Joint Motion, Ameren Missouri's MISO participation would continue until at least the end of 2018.

⁶ Ameren Missouri indicated that it could engage in transactions in MISO's markets even if it is not a member, but to do so, it would be required to incur substantial through and out transmission charges that MISO members do not have to pay.

acquisition of firm transmission service out of MISO into SPP), Ameren Missouri indicated that it would be short capacity in SPP and consequently face an uncertain cost exposure. Ameren Missouri explained that this cost exposure would arise from Ameren Missouri being required to purchase capacity in SPP through the bilateral market (which lacks both depth and transparency) while selling capacity in MISO. Ameren Missouri asserted that it would also face additional administrative cost and market risk if it were to operate those assets in a market separate from the market where the rest of its generating fleet and its load reside. Ameren Missouri has estimated that it would incur MISO “through and out” charges of \$83 million per year in order to “pseudo tie” all of its Illinois-based assets into SPP.

6. While the Stakeholders have not independently verified the facts provided by Ameren Missouri relating to all the foregoing considerations, they agree that those considerations currently make extending the date to file the next case to March 15, 2020 reasonable, subject to the agreements set forth below for annual consultation with the Stakeholders and the ability of Stakeholders to petition the Commission to require an earlier filing date for the next case as outlined further below. One Stakeholder, the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”) did not agree that an extension without a first conducting a cost-benefit study was reasonable. The other Stakeholders to this case are MISO, The Empire District Electric Company (“Empire”), and SPP. MISO and Empire have indicated that they do not oppose the relief sought in this Joint Motion, while SPP has not stated a position.

7. Ameren Missouri agrees that it will convene meetings of the Stakeholders on or before January 30 of 2018 and 2019, to discuss whether extending the time for filing a new case

to March 15, 2020 remains reasonable. The discussion will include a review of the considerations set forth in paragraphs 4 and 5 of this Joint Motion, and such other considerations as Ameren Missouri or the Stakeholders believe should be discussed relative to Ameren Missouri's continued MISO participation. Ameren Missouri agrees to file status reports with the Commission by March 30 of 2018 and 2019 reporting on the Stakeholder meetings. The Joint Movants further agree that after such a meeting(s), any Stakeholder could petition the Commission to further modify its April 19, 2012, *Report and Order*, as previously modified and as further modified as requested herein, to change the timing of the conduct of a further cost-benefit study and subsequent filing of the next case.

8. In requesting that the Commission further modify the April 19, 2012, *Report and Order*, the Joint Movants' intention is to continue unchanged the current terms of Ameren Missouri's MISO participation, including the effectiveness of the Service Agreement, and to otherwise continue the terms of the April 19, 2012, *Report and Order*, as it was modified by the *First Modification Order*, except for a modification of the timeline for the conduct of a further cost-benefit study and the filing of the next case.

9. After accounting for the clarification of the April 19, 2012, *Report and Order* by the Commission's May 17, 2012 *Order Granting Ameren Missouri's Motion to Clarify Report and Order* and its modification by the *First Modification Order*, the Joint Movants have agreed that the portions of the April 19, 2012, *Report and Order*, as previously clarified by the Commission's May 17, 2012, *Order Granting Ameren Missouri's Motion to Clarify Report and Order*, should be further modified to state as follows:

- a. Ameren Missouri's authority to continue the transfer of functional control of its transmission system to MISO is granted subject to the following conditions

(Ordering Paragraph 2 April 19, 2012, *Report and Order* and *First Modification Order*):

- i. The Commission approves, on an interim basis, Ameren Missouri's continued Regional Transmission Organization ("RTO") participation in MISO during a term ending May 31, 2021, provided that if the Commission has not by May 31, 2021, further extended its approval of Ameren Missouri's participation in MISO, Ameren Missouri shall be deemed to have Commission approval to continue its MISO participation for the additional time necessary to re-establish functional control of its transmission system so that it may operate the same as an Independent Coordinator of Transmission ("ICT"), or to transfer functional control of its transmission system to another RTO. The extended permission granted in this order is also subject to the provisions of paragraph a. vii of this order. (Ordering Paragraph 2.A April 19, 2012, *Report and Order* and *First Modification Order*).
- ii. Assuming that Ameren Missouri has not earlier requested withdrawal or that withdrawal has not otherwise occurred, by January 30, 2019, Ameren Missouri shall contact and consult with the Stakeholders to review with the Stakeholders the additional analysis Ameren Missouri believes is appropriate and necessary regarding Ameren Missouri's continued participation in an RTO after May 31, 2021, or its operation as an ICT. Such study, at a minimum, shall examine continued participation in MISO versus participation in SPP and continued participation in MISO

versus operation as an ICT. Such study shall examine a period after May 31, 2021, of not less than five (5) years or more than ten (10) years.

(Ordering Paragraph 2.B April 19, 2012, *Report and Order* and *First Modification Order*).

- iii. After taking into consideration in good faith the comments and input from the Stakeholders regarding the tentative analysis, Ameren Missouri shall, by March 30, 2019, advise the Stakeholders of the specific parameters, (including the minimum requirements provided for above) of the analysis Ameren Missouri intends to conduct. (Ordering Paragraph 2.C April 19, 2012, *Report and Order* and *First Modification Order*).
- iv. By March 15, 2020, Ameren Missouri shall file a pleading, along with the results of its actual analysis regarding its continued RTO participation or its possible operation as an ICT after May 31, 2021. That pleading shall also address, among other things, whether the Service Agreement or similar mechanism for the provision of transmission service to Missouri Bundled Retail Load should continue to remain in effect between Ameren Missouri and any RTO in which Ameren Missouri may participate after May 31, 2021. (Ordering Paragraph 2.D April 19, 2012, *Report and Order* and *First Modification Order*).
- v. Ameren Missouri shall work with Staff, Public Counsel, and MIEC, and give them substantive input regarding the development of the specific methodology, inputs, outputs, and other features to be included in the March 15, 2020 actual analysis. Ameren Missouri shall advise and update

MISO and SPP regarding that actual analysis. (Ordering Paragraph 2.E April 19, 2012, *Report and Order* and *First Modification Order*).

- vi. If any difference of opinion regarding the scope, particular details or preliminary assumptions that are necessary to and part of any supporting analysis to be performed by Ameren Missouri arises, Ameren Missouri shall ultimately have responsibility for, and the burden of presenting an analysis in support of whatever position it deems appropriate and necessary at the time of its March 15, 2020 filing. Accordingly, Ameren Missouri is entitled to maintain a level of independence and control of any such analysis, while other parties retain their right to oppose Ameren Missouri's positions or to provide alternative positions. (Ordering Paragraph 2.I April 19, 2012, *Report and Order* and *First Modification Order*).
- vii. If Ameren Missouri withdraws from MISO, or if the authority granted in this order is not extended beyond May 31, 2021, Ameren Missouri will have to re-establish functional control of its transmission system as a transmission provider, or, depending upon further orders of the Commission and the FERC, may have to transfer functional control of its transmission system to another entity. In either case, Ameren Missouri would have to give notice to MISO of its withdrawal. Under Article Five of the Transmission Owners Agreement, such notice shall not be effective before December 31 of the calendar year following the calendar year in which notice is given by Ameren Missouri to MISO. For a

possible withdrawal from the MISO to occur no later than May 31, 2021, the Commission will need to issue a decision with respect to Ameren Missouri's continued participation in MISO no later than December 15, 2020. (Ordering Paragraph 2.O April 19, 2012, *Report and Order* and *First Modification Order*).

- viii. For transmission facilities located in Ameren Missouri's certificated service territory that are constructed by an Ameren affiliate and that are subject to regional cost allocation by MISO, for ratemaking purposes in Missouri, the costs allocated to Ameren Missouri by MISO shall be adjusted by an amount equal to the difference between: (i) the annual revenue requirement for such facilities that would have resulted if Ameren Missouri's Commission-authorized ROE and capital structure had been applied and there had been no construction work in progress ("CWIP") (if applicable), or other FERC Transmission Rate Incentives, including Abandoned Plant Recovery, recovery on a current basis instead of capitalizing pre-commercial operations expenses and accelerated depreciation, applied to such facilities and (ii) the annual FERC-authorized revenue requirement for such facilities. The ratemaking treatment established in this provision will, unless otherwise agreed or ordered, end with the issuance of the Commission's report and order at the conclusion of the case to be filed by Ameren Missouri on or before March 15, 2020, regarding Ameren Missouri's participation in MISO, another

RTO, or operation as an ICT. (Ordering Paragraph 2.S April 19, 2012, *Report and Order*)

- ix. Ameren Missouri has agreed that Ameren Services transmission personnel will provide the Stakeholders a presentation on the current and near term plans for Ameren (Ameren Missouri, ATX, and ATXI) regarding local and regional transmission construction in Missouri during 2017, 2018, 2019, and 2020 at a mutually convenient time and location.
- x. For purposes of the conditions imposed in this order, the Stakeholders are defined as Ameren Missouri, Staff, MISO, MIEC, OPC, Empire, SPP, and MJMEUC. (Ordering Paragraph 2.T April 19, 2012, *Report and Order* and *First Modification Order*).
- xi. Ordering Paragraphs 2.F, 2.H, 2.J, 2.K, 2.L, 2.M, 2.N, 2.P, and 2.Q of the April 19, 2012 *Report and Order* are unchanged and remain in effect.⁷ Ordering Paragraph 2.R of the April 19, 2012, *Report and Order* was previously effectuated and as a consequence was so indicated by the *First Motion to Modify* and was so modified by the *First Modification Order*. Ordering Paragraph 2.G of the April 19, 2012, *Report and Order*, as previously modified by the Commission's May 17, 2012, *Order Granting Ameren Missouri's Motion to Clarify Report and Order*, and Ordering Paragraph 2.U, as added by the Commission's May 17, 2012, *Order*

⁷ Ordering Paragraph 2.F (addresses cost-benefit study); Ordering Paragraph 2.H (addresses cost-benefit study); Ordering Paragraph 2.J (addresses FERC incentive adders); Ordering Paragraph 2.K (addresses Service Agreement between MISO and Ameren Missouri); Ordering Paragraph 2.L (bases for Commission withdrawal of authorization to participate); Ordering Paragraph 2.M (bases for termination of Commission authorization to participate); Paragraph 2.N (not bases for termination of Commission authorization to participate); Paragraph 2.P (addresses securitization of revenues); and Ordering Paragraph 2.Q (if Ameren Missouri seeks to change its membership participation or status in MISO).

Granting Ameren Missouri's Motion to Clarify Report and Order, are unchanged and remain in effect.⁸

- xii. On or before January 30 of 2018 and 2019, Ameren Missouri shall convene a Stakeholder meeting or meetings to discuss whether extension of the time to file the next case to March 15, 2020 remains reasonable. The discussion will include a review of the considerations set forth in paragraphs 4 and 5 of this *Joint Motion to Make Additional Modifications to April 19, 2012 Report and Order*, and such other considerations as Ameren Missouri or the Stakeholders believe should be discussed relative to Ameren Missouri's continued MISO participation. Ameren Missouri will file a report on each such discussion by March 30 of the year in which the discussion occurs. After each such a meeting, any Stakeholder may petition the Commission to further modify its April 19, 2012 *Report and Order* to change the timing of the conduct of a further cost-benefit study and subsequent filing of Ameren Missouri's next RTO-ICT-related case. (Ordering Paragraph 2 *First Motion to Modify*).

WHEREFORE, the Joint Movants request the Commission make and enter its order modifying the April 19, 2012 *Report and Order*, to state as outlined in paragraph 9.a hereof.

⁸ Ordering Paragraph 2.G (addresses cost-benefit study) and Ordering Paragraph 2.U (addresses "highly confidential" and "proprietary" information).

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was served via e-mail on counsel for the parties of record to this case, on this 23rd of January, 2017.

/s/James B. Lowery
James B. Lowery

CASE NO. EO-2011-0128 EVENTS

April 19, 2012	Commission <i>Report and Order</i> (“April 19, 2012, <i>Report and Order</i> ”)
April 27, 2012	Ameren Missouri’s Motion for Clarification of Report and Order
May 17, 2012	Commission <i>Order Granting Ameren Missouri’s Motion to Clarify Report and Order</i> (May 17, 2012, <i>Order</i>)
November 24, 2014	Joint Motion of Ameren Missouri, the Staff, the Office of the Public Counsel, and the Missouri Industrial Energy Consumers to Modify April 19, 2012 Report and Order (“First Motion to Modify”)
November 26, 2014	Amendment to Joint Motion of Ameren Missouri, the Staff, the Office of the Public Counsel, and the Missouri Industrial Energy Consumers to Modify April 19, 2012, Report and Order (“First Motion to Modify”)
December 22, 2014	Commission <i>Order Modifying 2012 Report and Order</i> (“ <i>First Modification Order</i> ”)
September 27, 2016	Ameren Missouri convened a meeting of Stakeholders to review Ordering Paragraphs 2 and 3 of the <i>First Modification Order</i> respecting the additional analysis Ameren Missouri believes is appropriate and necessary concerning Ameren Missouri’s participation in RTO after May 31, 2018 and petitioning the Commission to further modify its April 19, 2012, <i>Report and Order</i> to change the timing of the conduct of a further cost-benefit study and subsequent filing of Ameren Missouri’s next RTO-ICT-related case
October 7, 2016	Ameren Missouri convened a second meeting of Stakeholders
January 23, 2017	Filing of Joint Motion To Make Additional Modifications To April 19, 2012 Report And Order

JOINT MOVANTS’ PROPOSED SCHEDULE BASED ON JOINT MOTION TO MAKE ADDITIONAL MODIFICATIONS TO APRIL 19, 2012 REPORT AND ORDER

January 30, 2018	Ameren Missouri shall convene a Stakeholder meeting or meetings to discuss whether extension of the time to file the next case to March 15, 2020 remains reasonable ¹
March 30, 2018	Ameren Missouri will file a status report advising of the substance of the Stakeholder meeting

¹ After such a meeting(s), any Stakeholder could petition the Commission to further modify its April 19, 2012, *Report and Order*, as previously modified and as further modified as requested herein, to change the timing of the conduct of a further cost-benefit study and subsequent filing of the next case.

January 30, 2019	Ameren Missouri shall convene a Stakeholder meeting or meetings to discuss whether extension of the time to file the next case to March 15, 2020 remains reasonable and shall contact and consult with Stakeholders to review the additional analysis Ameren Missouri believes is appropriate and necessary regarding Ameren Missouri's participation in RTO after May 31, 2021 ²
March 30, 2019	Ameren Missouri will file a status report advising of the substance of the Stakeholder meeting and shall advise the Stakeholders of the specific parameters of the analysis Ameren Missouri intends to conduct
March 15, 2020	Filing of new case to continue to participate in MISO with the results of its actual analysis regarding its continued RTO participation or its possible operation as an ICT after May 31, 2021
December 15, 2020	Date by which the Commission will need to issue a decision with respect to Ameren Missouri's continued participation in MISO for a possible withdrawal from MISO to occur no later than May 31, 2021
May 31, 2021	May 31, 2021 end date of extension of period to participate in MISO on an interim basis by additional modifications to April 19, 2012, <i>Report and Order</i>

² After such a meeting(s), any Stakeholder could petition the Commission to further modify its April 19, 2012, *Report and Order*, as previously modified and as further modified as requested herein, to change the timing of the conduct of a further cost-benefit study and subsequent filing of the next case.