

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

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

STAFF RESPONSE

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and hereby files its response to the *Motion to Modify Procedural Schedule (Motion)*, filed by Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company") on April 2, 2015, by stating as follows:

1. Staff has no objection to the proposed modification to the schedule that Ameren Missouri submitted in its *Motion*. Staff recognizes that numerous issues were raised in rebuttal testimony of various parties to which the Company may need additional time to adequately address in its surrebuttal testimony. In order to accommodate the additional time for filing surrebuttal testimony, Staff agrees that the rest of the procedural schedule should also be adjusted. However, based on Ameren Missouri's *Motion*, Staff is concerned that there may be new issues raised in Ameren Missouri's surrebuttal to which the parties would need the opportunity to respond.

2. In paragraph 1 of the Company's *Motion*, it stated, "Rebuttal testimony has raised issues that might suggest that some modifications to Ameren Missouri's original plan are warranted in order to improve that plan, and Ameren Missouri wants to thoughtfully analyze and consider whether that is the case in responding to the issues rebuttal testimony rose." Further, in paragraph 4, Ameren Missouri stated, "The harm that will be avoided by granting this Motion is the inadequacy of the information the

Commission needs to properly consider the Company's MEEIA cycle 2 Plan, *and possible modifications* to address legitimate issues parties have raised..." (emphasis added).

3. Based on the tenor of the Company's Motion, there may be new issues or modifications raised by the Company in its surrebuttal to which the Staff and parties may need to respond. In the event that Ameren Missouri modifies its plan, Staff requests that the Commission allow the parties an opportunity to evaluate and respond to the changes. Significant changes might necessitate a procedural conference or an agreement to further extend the procedural schedule.

WHEREFORE, Staff supports the modifications to the procedural schedule as outlined in Ameren Missouri's *Motion*, but Staff requests that the Commission offer the parties an opportunity to respond to any new issues or modifications to the plan that may be included in the Company's surrebuttal testimony.

Respectfully Submitted,

/s/ Marcella L. Mueth

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 6th day of April, 2015.

/s/ Marcella L. Mueth