

**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)	<u>File No. EO-2015-0055</u>
Regulatory Changes in Furtherance of Energy)	Tariff No. YE-2015-0227
Efficiency as Allowed by MEEIA)	

**STAFF MOTION FOR LEAVE TO FILE TESTIMONY IN SUPPORT OF
NON-UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its Motion for Leave to File Testimony in Support of Non-Unanimous Stipulation and Agreement, hereby states:

1. Ameren Missouri filed its Application to Approve DSIM Filing, Request for Variances and Motion to Adopt Procedural Schedule December 22, 2014, in relation to the Missouri Energy Efficiency Investment Act ("MEEIA") for its Cycle 2 program. Ameren Missouri also filed a Non-Unanimous Stipulation and Agreement and a Motion for Leave to File Testimony in Support of Non-Unanimous Stipulation and Agreement June 30, 2015.

2. The Commission has ordered evidentiary hearings to take place on July 20 to 22, 2015.

3. OPC filed a Non-Unanimous Stipulation and Agreement Regarding Ameren Missouri's MEEIA Cycle 2 July 7, 2015, joined by Staff, Earth Island Institute d/b/a Renew Missouri, Missouri Industrial Energy Consumers, and Midwest Energy Consumers' Group. The Stipulation reflects a plan that meets the requirements of "all cost effective" and provides a reasonable return to Ameren Missouri. In order to come to this agreement, Staff has modified its positions to meet the concerns of the other

signatory parties to the Stipulation. In light of these modifications, Staff's original filed testimony is not entirely applicable to the present positions.

4. Staff proposes that the Commission permit it and the other signatory parties to this Stipulation the opportunity to file supplemental direct testimony in support of its Non-Unanimous Stipulation and Agreement.

WHEREFORE, Staff prays that the Commission will:

1. Allow signatory parties the opportunity to file supplemental direct testimony in support of the Non-Unanimous Stipulation and Agreement no later than 3:00 p.m. on Thursday July 9, 2015.
2. Order all parties to file any rebuttal to Staff's supplemental direct testimony no later than 3:00 p.m. on Wednesday July 15, 2015.
3. Grant such other and further relief as the Commission considers just in the circumstances.

Respectfully submitted,

/s/ Whitney Payne

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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 8th day of July, 2015, to all counsel of record.

/s/ Whitney Payne