## 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	)	
Regulatory Changes in Furtherance of Energy	)	Case No. EO-2015-0055
Efficiency as Allowed by MEEIA.	ý	

## MOTION FOR LEAVE TO FILE CORRECTED SUPPLEMENTAL DIRECT TESTIMONY OF STAFF WITNESS SARAH KLIETHERMES

**COMES NOW** the Staff of the Missouri Public Service Commission, by and through counsel, and hereby files its *Motion for Leave to File Corrected Supplemental Direct Testimony of Staff Witness Sarah Kliethermes* ("Motion") and for its Motion states:

- On July 9, 2015, Staff witness Sarah Kliethermes filed supplemental direct testimony in support of the Amended Non-Unanimous Stipulation and Agreement filed by non-utility signatories on July 8, 2015 as allowed by Commission order.
- 2. Yesterday, July 13, 2015, Staff found an error that causes it to change the demand-related Performance Incentive value for Tier 1, changing the value from \$37/kW to \$48/kW. This correction necessitates that Staff correct its originally filed supplemental direct testimony and therefore seeks leave of the Commission to do so in this Motion. Staff will file a red-lined version of the corrected testimony for ease of reference.
- 3. There is no prejudice to Ameren Missouri or the signatories to its Non-Unanimous Stipulation and Agreement filed on June 30, 2015 because the change in value from \$37/kW to \$48/kW provides a slight increase in payout to Ameren Missouri should the Commission adopt the non-utility parties' proposed demand-related

Performance Incentive award for Tier 1. Staff will provide supporting workpapers from Ms. Kliethermes upon filing of her corrected supplemental direct testimony.

WHEREFORE, for the reasons stated above the Staff respectfully requests leave of the Commission to file the corrected supplemental direct testimony of Staff witness Sarah Kliethermes.

Respectfully submitted,

## /s/ Robert S. Berlin

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## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 14<sup>th</sup> day of July, 2015 to all counsel of record in this proceeding.

/s/ Robert S. Berlin