

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

In the Matter of the Application of Union Electric)	
Company d/b/a Ameren Missouri for Certificates of)	<u>File No. EA-2023-0286</u>
Convenience and Necessity for Solar Facilities.)	

**MOTION TO AMEND PROCEDURAL
SCHEDULE AND MOTION FOR EXPEDITED
TREATMENT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and hereby requests that the Commission amend the current procedural schedule by cancelling the settlement conference scheduled for tomorrow, October 17, 2023, and requests expedited treatment of its motion. In support of its motion, Ameren Missouri states as follows:

1. On August 8, 2023, the Commission adopted a procedural schedule that had been agreed upon by all parties. That schedule called for a settlement conference on October 17, 2023.
2. Staff and the Company have conferred regarding whether the time is right to discuss a possible settlement of this docket given the extensive rebuttal testimony filed by Staff three business days ago. No other party filed rebuttal testimony. Staff and the Company agree that the settlement conference scheduled for tomorrow should be cancelled. Staff and the Company intend to continue discussions about the possibility of having a settlement conference at a future date (and will consult with the other parties to this docket as well).¹
3. Counsel for all of the other parties have been consulted about cancelling tomorrow's scheduled conference and have authorized the undersigned counsel for Ameren Missouri to state that their client does not object.
4. Given that the conference is scheduled for tomorrow, the Company requests

¹ Any party or all parties are of course free to make settlement proposals or request settlement discussions with another party or all parties at any time.

expedited treatment of this motion. This motion was filed as soon as it could have been under the circumstances, given that testimony from 14 Staff witness was just filed three business days ago and that the Company did not hear back from the Staff regarding whether it agreed the conference should be cancelled until today. There will be no harm to any party or the general public from cancelling the scheduled conference since the parties are not in a position to have productive settlement discussions at this time.

WHEREFORE, the Company respectfully requests that the Commission make and enter its order cancelling tomorrow's scheduled settlement conference, and that it expedite entry of such an order and issue the same by October 17, 2023

Respectfully Submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
JBL LAW, LLC
9020 S. Barry Rd.
Columbia, MO 65201
Telephone: 573-476-0050
E-Mail: lowery@jbllawllc.com

Wendy K. Tatro, Mo Bar #60261
Director and Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue
St. Louis, MO 63103
Telephone: (314) 554-3484
Facsimile: (314) 554-4014
E-Mail: AmerenMOService@ameren.com

**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 16th day of October, 2023.

/s/ James B. Lowery