

**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) **File No. EA-2023-0286**
Convenience and Necessity for Solar Facilities.)

**UNOPPOSED 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 extending the due date for surrebuttal and cross-surrebuttal testimony to November 9, 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 the filing of surrebuttal/cross-surrebuttal testimony on November 3, 2023.

2. The Company has been in the process of preparing its surrebuttal testimony since 14 pieces of rebuttal testimony from the Staff were filed the afternoon of October 11, 2023. However, one of the Company's main witnesses, who filed direct testimony in this case and who will need to file surrebuttal testimony in this case, was hospitalized last week for approximately four days. While the witness is expected to fully recover and has returned to work with some limitations, it is not possible to properly complete the Company's surrebuttal testimony by November 3, 2023, under these circumstances. The inability to complete the testimony applies to the subject witness's surrebuttal testimony and other Company surrebuttal testimony, which will be interrelated to and interdependent on the subject witness's testimony.

3. The Company believes that a four-business day extension will be sufficient to

allow the proper preparation of its surrebuttal testimony.

4. The Company has consulted with counsel for the other parties, all of whom have indicated that their clients do not oppose extension of the surrebuttal/cross-surrebuttal testimony deadline to November 9, 2023.

5. Given that the existing deadline is fast approaching, the Company requests expedited treatment of this motion. This motion was filed as soon as it could have been under the circumstances, given that the Company is only today able to assess the subject witnesses' availability. There will be no harm to any party or the general public from extending the deadline given that the hearings in this case are not scheduled to begin until November 29, 2023.

WHEREFORE, the Company respectfully requests that the Commission make and enter its order extending the deadline for filing surrebuttal and cross-surrebuttal testimony to November 9, 2023

Respectfully Submitted,

/s/ James B. Lowery

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**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 counsel for all parties of record via electronic mail (e-mail) on this 30th day of October, 2023.

/s/ James B. Lowery