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 Convenience and Necessity for Solar Facilities.

<u>File No. EA-2023-0286</u>

<u>UNOPPOSED MOTION TO SUSPEND</u> <u>PROCEDURAL SCHEDULE AND MOTION</u> <u>FOR EXPEDITED TREATMENT</u>

)

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and or its unopposed motion for a Commission order suspending the current procedural schedule and for expedited treatment of its motion, states as follows:

1. On October 30, 2023, the Company requested an amendment to the then-in-effect procedural schedule due to the hospitalization of one of its main witnesses, requesting an extension of the deadline to file surrebuttal testimony to November 9, 2023. That motion was unopposed. By order dated November 1, 2023, the Commission granted the Company's request to extend the deadline for surrebuttal testimony and made certain other changes to the procedural schedule.

2. Unfortunately, the Company's witness was re-hospitalized last week. The Company is assessing the short- and longer-term impact of the witness's health on this case but given that the priority at this time is to allow the witness to work with medical personnel to address his health issues and treatment plan, the Company unable at this time to determine the impact. The current situation prevents the Company from completing and filing its surrebuttal testimony. Consequently, it is not possible to keep the current procedural schedule and hearing dates in place.

3. The Company intends to assess the situation over the next few weeks and would expect to engage in discussions with the parties about a revised procedural schedule later this

1

month, with the goal of such discussions to lead to a joint proposal for an amended procedural schedule.

4. Given these circumstances, the Company requests that the Commission enter its order suspending the current procedural schedule.

5. The Company has consulted with counsel for the other parties, all of whom have indicated that their clients do not oppose suspension of the procedural schedule.

6. Given the current procedural schedule's deadlines, 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 was only able to contact the parties and obtain confirmation that they did not oppose suspension of the procedural schedule near the end of the day on Friday, November 3, 2023.

WHEREFORE, the Company respectfully requests that the Commission make and enter its order suspending the procedural schedule.

Respectfully Submitted,

Isl 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

2

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 6th day of November, 2023.

Isi James B. Lowery