

23rd Motion to Suspend Procedural Schedule in return for the suspension of the current procedural schedule and the adoption of the following revised proposed procedural schedule. Staff reserves its right to renew its Motion should it determine, after working with the Company to resolve Staff's discovery issues, that further suspension is required.

	<u>Current Due Date</u>	<u>Proposed Due Date</u>
Rebuttal	8/14	8/30
Surrebuttal/Cross	8/30	9/17
Last Day of Discovery	9/7 ¹	9/27
List of Issues, etc.	9/11	10/1
Statement of Position	9/14	10/4
Pre-marked Exhibit List	9/28	10/11
Hearing	10/2 – 10/5	10/15 – 10/19
Initial Briefs	10/26	11/14
Reply Briefs	11/2	11/30
Requested Order	11/30	12/28

4. Because rebuttal testimony is currently due on August 14th, Joint Movants request that the Commission set July 30th by close of business as the deadline for any party responses to this Joint Motion and respectfully request the Commission expedite the approval of the above proposed revised procedural schedule by issuing an order by delegation by August 1, 2018².

¹ By issuing Data Requests or other written discovery requests, subpoenas, or the last date by which a deposition may be taken.

² Joint Movants understand there is no scheduled Agenda meeting on August 1st.

WHEREFORE, for the reasons stated above, Joint Movants pray the Commission 1) suspend the current procedural schedule, 2) adopt the above proposed revised procedural schedule, 3) set July 30th by close of business as due date for any responses, and 4) expedite approval of this Joint Motion by issuing an order by delegation by August 1, 2018, and order any other relief just in the circumstances.

Respectfully submitted,

/s/ Robert S. Berlin

Robert S. Berlin
Deputy Staff Counsel
Missouri Bar No. 51709

Attorney for the Staff of the
Missouri Public Service Commission
P.O. Box 360
Jefferson City, MO 65102
Phone (573) 526-7779
Facsimile (573) 751-9285
bob.berlin@psc.mo.gov

/s/ Paula N. Johnson

Paula N. Johnson, #68963
Senior Corporate Counsel
Ameren Missouri
1901 Chouteau
P.O. Box 66149, MC 1310
St. Louis, MO 63166-6149
(314) 554-3533 (phone)
(314) 554-4014 (fax)
AmerenMOService@ameren.com

**ATTORNEY FOR UNION ELECTRIC
COMPANY D/B/A AMEREN MISSOURI**

CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the foregoing document has been electronically mailed this 26th day of July, 2018 to all counsel of record in this proceeding.

/s/ Robert S. Berlin _____