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

)

)

)

)

In the Matter of Union Electric Company d/b/a Ameren Missouri's 4<sup>th</sup> Filing to Implement Regulatory Changes in Furtherance of Energy Efficiency as Allowed by MEEIA.

File No. EO-2023-0136

#### JOINT MOTION TO AMEND PROCEDURAL SCHEDULE

**COME NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), Staff of the Missouri Public Service Commission ("Staff" and "Commission," respectively), the Office of Public Counsel ("OPC"), Renew Missouri Advocates d/b/a Renew Missouri ("Renew Missouri"), Natural Resources Defense Council ("NRDC"), Midwest Energy Consumers Group ("MECG"), and Consumers Council of Missouri ("Consumers Council"), collectively, the "Parties," and jointly propose to amend the procedural schedule to allow a one week extension for briefing in order to determine if a settlement can be reached.

1. On July 26, 2024, the hearings concluded in this matter and initial briefs were due on August 21, 2024. At the August 7, 2024, agenda session, the Commission suggested a path forward in this docket and based on the Commission feedback, the Parties have scheduled meetings to determine whether a settlement can be accomplished.

2. Accordingly, the Parties agreed to discuss the potential of a settlement and after some discussions, determined additional time is needed. The Parties respectfully request the schedule be amended to allow initial briefs to be filed on September 18, 2024, and reply briefs to be filed on October 9, 2024.

**WHEREFORE**, the Signatories to this pleading respectfully request the Commission adopt the amended procedural schedule to allow the parties to discuss a possible settlement.

Respectfully submitted,

#### /s/ Jennifer S. Moore

Jennifer S. Moore, MO Bar #75056 Senior Corporate Counsel Wendy K. Tatro, MO Bar #60261 Director & Assistant General Counsel Ameren Missouri 1901 Chouteau Avenue, MC 1310 St. Louis, MO 63103 Telephone: (314) 554-3533 <u>AmerenMOService@ameren.com</u> Carla Fields-Johnson, MO Bar # 47149 Fields & Brown, LLC 300 E. 39<sup>th</sup> Street, Suite 1P Kansas City, MO 64111 cfields@fieldsandbrown.com

## ATTORNEYS FOR UNION ELECTRIC COMPANY D/B/A AMEREN MISSOURI

/s/ Lindsay VanGerpen

Lindsay VanGerpen, MO Bar #71213 Senior Counsel Office of Public Counsel PO Box 2230 Jefferson City, MO 65102 Telephone: (573) 751-5565 Lindsay.VanGerpen@opc.mo.gov

# ATTORNEY FOR THE OFFICE OF PUBLIC COUNSEL

### /s/ Travis Pringle

Travis Pringle, MO Bar # 71128 Chief Deputy Counsel Tracy Johnson, MO Bar #65991 Senior Counsel PO Box 360 Jefferson City, MO 65102 Telephone: 573-751-5700 Travis.Pringle@psc.mo.gov

# ATTORNEYS FOR THE STAFF OF THE MISSOURI PUBLIC SERVICE COMMISSION

#### /s/ Tim Opitz

Tim Opitz, MO Bar #65082 Opitz Law Firm, LLC 308 E. High Street, Suite B101 Jefferson City, MO 65101 Telephone: (573) 825-1796 tim@renewmo.org

#### ATTORNEY FOR MIDWEST ENERGY CONSUMERS GROUP

#### /s/ John B. Coffman

John B. Coffman, MO Bar #36591 John B. Coffman, LLC 871 Tuxedo Blvd. St. Louis, MO 63119-2044 Telephone: (573) 424-6779 john@johncoffman.net

## ATTORNEY FOR CONSUMERS COUNCIL OF MISSOURI

/s/ Alissa Greenwald

Alissa Greenwald, Mo. Bar No. 73727 KEYES & FOX LLP 1580 Lincoln St., Suite 1105 Denver, CO 80203 Telephone: (913) 302-5567 E-mail: agreenwald@keyesfox.com

# ATTORNEYS FOR RENEW MISSOURI ADVOCATES D/B/A RENEW MISSOURI

### /s/ Sarah Rubenstein

Sarah Rubenstein, MO Bar #48874 Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, MO 63102 Telephone: (314) 231-4181

# ATTORNEY FOR NATURAL RESOURCES DEFENSE COUNCIL

# **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served to all parties of record via electronic mail (e-mail) on this 6<sup>th</sup> day of September, 2024.

/s/ Lindsay VanGerpen