BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Tariffs to Adjust Its)	File No. ER-2024-0319
Revenues for Electric Service.)	

MOTION TO MODIFY ORDER SETTING PROCEDURAL SCHEDULE

COMES NOW Union Electric Company d/b/a Ameren Missouri, by and through counsel, on behalf of all the parties, and for the parties' motion requesting that the Commission modify its August 28, 2024, *Order Setting Procedural Schedule and Adopting Test Year* ("Procedural Order"), states as follows:

- 1. On February 26, 2025, the parties reached an agreement in principle that resolves all revenue requirement issues in this case. The parties will be working together in the coming days to finalize a formal Stipulation and Agreement reflecting the agreed upon terms.
- 2. The above-referenced agreement leaves most class cost of service and revenue allocation issues unresolved. At the current time, the parties expect those issues to be taken up during a portion of the days currently reserved for evidentiary hearings in this case (March 17 to 28, 2025). The parties anticipate that the issues remaining for hearing can be tried in one to two days.
- 3. The Procedural Order sets a deadline of today for submission of a List of Issues, Order of Hearing, and Stipulation of Facts. Given the above-referenced agreement in principle on the revenue requirement issues, the content and breadth of these filings can now be substantially reduced. However, the parties need some additional time to collaborate on developing the filings.
- 4. Consequently, the parties request that the Commission modify the Procedural Order by extending the deadline to file the List of Issues, Order of Hearing, and Stipulation of Facts to

March 3, 2025, and extending the deadline to file Position Statements on the remaining contested issues to March 10, 2025. The parties further request that they be allowed to recommend hearing dates (between March 17 and 28, 2025) for hearing of the remaining issues as part of their filing of the List of Issues and Order of Hearing.

- 5. The parties further request that the Procedural Order's requirements to provide issues values to Staff and for Staff to file a reconciliation be eliminated as unnecessary.
- 6. The undersigned counsel for the Company has been authorized to state that counsel for all parties to this case agree with and consent to this Motion.

WHEREFORE, Ameren Missouri, on behalf of the parties, requests that the Commission make and enter its order modifying the Procedural Order as outlined herein, and for such other and further relief as the Commission deems appropriate under the circumstances.

Respectfully submitted,

/s/ James B. Lowery

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

/s/ Wendy K. Tatro

Wendy K. Tatro, MO Bar #60261 Director and Assistant General Counsel Ameren Missouri 1901 Chouteau Avenue, MC 1310 P.O. Box 66149 Telephone: 314-861-1705

Fax: 314-554-4014

AmerenMOService@ameren.com

ATTORNEYS FOR UNION ELECTRICCOMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

	I	hereby	certify	that	copies	of t	the	foregoing	have	been	mailed,	hand-delivere	d, or
transm	itte	ed by fa	csimile o	or ele	ctronic	mail	to c	counsel of r	ecord	as refl	ected on	the certified se	rvice
list mai	int	ained by	y the Co	mmis	ssion in	its E	lec	tronic Filin	g Info	rmatio	n Systen	n on this 27 th d	ay of
Februa	ry	2025.							_		-		-

/s/ Jim Lowery