

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

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's Tariff to Increase Its)	<u>Case No. ER-2014-0258</u>
Revenues for Electric Service.)	Tariff No. YE-2015-0003

**JOINTLY PROPOSED PROCEDURAL SCHEDULE
AND PROCEDURES**

COMES NOW the Staff of the Missouri Public Service Commission, on behalf of all the parties, including Office of the Public Counsel; Department of Economic Development, Division of Energy; Missouri Industrial Energy Consumers;¹ Earth Island Institute d/b/a Renew Missouri; City of O'Fallon; City of Ballwin; Missouri Retailers Association; International Brotherhood of Electrical Workers Local Union 1439, AFL-CIO; Sierra Club; Natural Resources Defense Council; Consumers Council of Missouri; and Midwest Energy Consumers Group,² and, as the Commission directed in its *Order* of July 11, 2014, submits the following jointly proposed procedural schedule, which is based upon an agreed-upon test year ended March 31, 2014, with a true-up cutoff date of December 31, 2014, except that the cutoff is January 1, 2015, for certain items where appropriate (see note * to the proposed schedule). Additionally, the parties jointly propose the Commission impose the procedural requirements that follow in its order that sets the procedural schedule for this case:

¹ Anheuser-Busch Companies, Inc., Ardagh Glass, BioKyowa, Inc., The Boeing Company, Doe Run, Enbridge Energy, General Motors Corporation, GKN Aerospace, Hussmann Corporation, JW Aluminum, Mallinckrodt, Monsanto,, Nestlé Purina PetCare, Noranda Aluminum and SunEdison Semiconductors.

² Wal-Mart Stores, Inc.; Continental Cement Company, LLC.; Buzzi Unicem USA; Missouri Ethanol LLC, d/b/a POET Biorefining – Laddonia; Cargill; Tyson Foods; Explorer Pipeline Company and Maritz Holdings, Inc.

- (a) All parties must comply with the requirements of Commission Rule 4 CSR 240-2.130 for prepared testimony, including the requirement that testimony be filed on line-numbered pages.
- (b) Although not all parties may agree upon how each issue should be described or on whether a listed issue is in fact a proper issue in this case, the parties shall agree upon and file a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which they will be called, and the order of cross-examination for each witness. The list of issues should be detailed enough to inform the Commission of each issue that must be resolved. The Commission will view any issue not contained in this list of issues as uncontested and not requiring resolution by the Commission.
- (c) Each party shall file a simple and concise statement summarizing its position on each disputed issue.
- (d) All pleadings, briefs, and amendments shall be filed in accordance with Commission Rule 4 CSR 240-2.080. Briefs shall follow the same list of issues as filed in the case and must set forth and cite the proper portions of the record concerning the remaining unresolved issues that are to be decided by the Commission.
- (e) If part of testimony or documents prefiled and served upon the parties before a hearing, a party need only provide a copy of the testimony or document to the court reporter for marking as an exhibit. If not prefiled and served upon the parties, then a party who has a document marked for use at the hearing shall have sufficient copies of the document to provide a copy not only to the court reporter, but also to each of the Commissioners, the presiding officer, and counsel for each other party.
- (f) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel by electronic means and in electronic form essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.
- (g) Documents filed in the Commission's Electronic Filing and Information System ("EFIS") shall be considered properly served by serving the same on counsel of record for all other parties via e-mail
- (h) Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another

party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of Ameren Missouri data request responses, Ameren Missouri shall post its data request responses on its Caseworks Extranet site; however, in the case of responses to data requests Staff issues to it, Ameren Missouri shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.

- (i) The parties shall make an effort to not include highly confidential or proprietary information in data requests. If highly confidential or proprietary information must be included in a data request, the highly confidential or proprietary information shall be appropriately designated as such pursuant to Commission Rule 4 CSR 240-2.135.
- (j) Until direct testimony is filed on December 5, 2014, the response time for all data requests shall be twenty calendar days, with ten calendar days to object or notify the requesting party that more than twenty calendar days will be needed to provide the requested information. After December 5, 2014, until rebuttal testimony is filed on January 16, 2015, the response time for data requests shall be fifteen calendar days to provide the requested information and eight calendar days to object or notify the requesting party that more than fifteen calendar days will be needed to provide the requested information. After rebuttal testimony is filed on January 16, 2015, the response time for data requests shall be five business days to provide the requested information and three business days to object or notify the requesting party that more than five business days will be needed to provide the requested information. If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to (except that, with the exception of responses to Staff, responses will not be needed for Ameren Missouri's data request responses posted on Ameren Missouri's Caseworks Extranet site).
- (k) Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within two (2) business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing highly confidential or proprietary information shall be appropriately marked. If there

are no workpapers associated with testimony, the party's attorney shall so notify the other parties within the time allowed for providing those workpapers.

- (l) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. With the exception of workpapers provided to Staff, Ameren Missouri may provide workpapers by posting the same on its Caseworks Extranet site, with e-mail notification to counsel for the parties to be provided essentially concurrently with the posting of workpapers on the Extranet site. Ameren Missouri shall provide its workpapers to Staff in electronic format by e-mailing or by delivery of a compact disc or other electronic storage
- (m) All data requests, subpoenas, or other discovery requests or notices shall be issued no later than February 13, 2015.
- (n) All motions to compel a response to any discovery request shall be filed no later than February 20, 2015. The Commission may rule on discovery motions filed after February 13, 2015 without holding the conference required by 4 CSR 240-2.090(8)(B).
- (o) Data requests and responses thereto made by any party in the following Commission cases shall be treated as having been made in this case, Case No. ER-2014-0258, subject to objections as to admissibility in evidence in this case:

<u>Case Number</u>	<u>Case Style</u>
EO-2014-0070	In the Matter of Staff's Audit of Union Electric Company d/b/a Ameren Missouri's Construction of Pollution Control Equipment at its Labadie Energy Center
ET-2014-0085	In the Matter of Ameren Missouri's Application for Authorization to Suspend Payment of Solar Rebates
EA-2014-0136	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing It to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage Solar Generation Facilities in O'Fallon, Missouri
EC-2014-0223	Noranda Aluminum, Inc., et al., Complainants, v. Union Electric Company d/b/a Ameren Missouri, Respondent

EC-2014-0224	Noranda Aluminum, Inc., et al., Complainants, v. Union Electric Company d/b/a Ameren Missouri, Respondent
EU-2012-0027	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for the Issuance of an Accounting Authority Order Relating to its Electrical Operations
ET-2014-0076	In the Matter of Union Electric Company d/b/a Ameren Missouri's Filing to Change Criteria for Assessment of New Customer Deposits
EF-2014-0227	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri For an Order Authorizing the Issue and Sale of Up to \$350,000,000 Aggregate Principal Amount of Additional Long-term Indebtedness.
EF-2014-0094	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for An Order Authorizing the Borrowing of up to \$800,000,000 Aggregate Principal Amount under a Long-Term Credit Facility
EO-2013-0503	In the Matter of Ameren Missouri's Renewable Energy Standard Compliance Plan for 2013-2015
EA-2012-0281	In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage A Utility Waste Landfill and Related Facilities at its Labadie Energy Center

WHEREFORE, the parties jointly propose the attached Procedural Schedule and request that the Commission impose the procedural requirements above in its order that sets the procedural schedule for this case.

Respectfully submitted,

/s/ Kevin A. Thompson

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **15th day of August, 2014**, on the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

/s/ Kevin A. Thompson

AMEREN MISSOURI
Case No. ER-2014-0258
PROPOSED PROCEDURAL SCHEDULE

<u>EVENT</u>	<u>DATE</u>
Case Filed	July 3, 2014
Direct Testimony (Non-Ameren Missouri parties, revenue requirement)	December 5, 2014
Direct Testimony (Non-Ameren Missouri parties, class cost of service and rate design)	December 19, 2014
Local Public Hearings (subject to Commission Order)	January 2015
Preliminary Reconciliation (not to be filed – to be Provided to all parties)	January 15, 2015
Technical/Settlement Conference	January 12-14, 2015
Rebuttal Testimony (all parties)	January 16, 2015
Preliminary Issue List (not to be filed – To be provided to all parties)	January 20, 2015
True-Up information to be provided by Ameren Missouri to all parties *	February 6, 2015
Surrebuttal Testimony (all parties)	February 6, 2015
Last Day to Request Discovery and date after which 4 CSR 240-2.090(8)(B) conference is not required	February 13, 2015
List of Issues, Order of Witness, Order of Cross Examination	February 18, 2015
Statement of Position	February 19, 2015
Last Day to File Motion to Compel Discovery	February 20, 2015
Final Reconciliation (to be filed)	February 20, 2015
Evidentiary Hearings	February 23-27, 2015 March 2-6, 2015 March 9-13, 2015

True-Up Direct Testimony **	March 17, 2015
True-Up Rebuttal Testimony **	March 23, 2015
True-Up Evidentiary Hearing	March 25-26, 2015
Initial Post Hearing Brief (all parties)	March 31, 2015
Reply/True-Up Briefs	April 10, 2015
Report and Order Issue Date	May 6, 2015
Operation of Law Date	May 30, 2015

* The last date that Ameren Missouri must provide Staff and all other parties auditable accounting information related to all items to be trued-up. Anticipated true-up items include changes to plant-in-service, depreciation reserve, all other rate base items, revenues (all categories), customer growth, net fuel costs (fuel, purchased power and off-system sales), Midwest Independent System Operator transmission revenues and expenses, refined coal project revenues and expenses, pensions and other post-employee benefits, payroll (including changes in pay rates, number of employees), other employee benefits, payroll taxes, vegetation management/infrastructure inspection expenditures, renewable energy standard costs, insurance expense, rate case expense, depreciation expense, various amortizations, income taxes, property taxes and other significant items that must be considered in order to maintain a proper matching of revenues, expenses and rate base. No party is precluded from proposing as additional item for true-up an item that causes a significant increase or decrease in Ameren Missouri's cost of service, i.e., in its revenues, expenses or investment, or proposing that any item(s) listed above not be trued-up. Certain items that occur on January 1, 2015, shall be trued-up, including changes in contractual commodity coal costs and coal transportation costs and wage and salary increases, as long as a proper relationship of all other revenues, expenses and rate base is maintained. Each true-up item must be known and measurable, recorded in Ameren Missouri's accounting system, and supported by documentation (including but not limited to invoices, inspections, general ledgers, operating reports, etc.) that demonstrate it has occurred; and, if the true-up item is rate based capital investment, that the investment is fully operational and used for service.

** No party shall revise or change that party's methods or methodologies in true-up testimony.