

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

In the Matter of Union Electric Company d/b/a)	
Ameren Missouri's 2 nd Filing to Implement)	<u>File No. EO-2015-0055</u>
Regulatory Changes in Furtherance of Energy)	Tariff No. YE-2015-0227
Efficiency as Allowed by MEEIA)	

**RESPONSE TO AMEREN'S MOTION FOR LEAVE TO FILE TESTIMONY
IN SUPPORT OF NON-UNANIMOUS STIPULATION AND AGREEMENT**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its *Response to Ameren's Motion for Leave to File Testimony in Support of Non-Unanimous Stipulation and Agreement* in this matter hereby states:

1. Ameren Missouri filed its *Application to Approve DSIM Filing, Request for Variances and Motion to Adopt Procedural Schedule* on December 22, 2014 in relation to the Missouri Energy Efficiency Investment Act (MEEIA) for its Cycle 2 program. Ameren Missouri also filed a *Non-Unanimous Stipulation and Agreement* and a *Motion for Leave to File Testimony in Support of Non-Unanimous Stipulation and Agreement* on June 30, 2015.

2. The Commission has ordered evidentiary hearings to take place from July 20 to 22, 2015.

3. Staff does not oppose the filing of the supplemental testimony of Lynn M. Barnes, William R. Davis and Daniel G. Laurent as requested by Ameren Missouri in its *Motion for Leave to File Testimony in Support of Non-Unanimous Stipulation and Agreement*.

4. Due to ongoing discussions between non-utility parties to reach a unified agreement in this proceeding, as well as the deadlines for review of true up and briefing in the Kansas City Power & Light rate increase proceeding, Staff requests that the Commission order testimony responsive to Ameren Missouri's supplemental direct testimony be due no later than July 15, 2015. Staff also requests that the Commission order amended position statements and an updated order of witnesses to be filed no later than July 16, 2015.

WHEREFORE, Staff does not oppose Ameren Missouri's request to file supplemental testimony and recommends that the Commission:

1. Order rebuttal testimony to Ameren Missouri's supplemental testimony be due no later than July 15, 2015;
2. Order amended position statements and the updated order of witnesses be filed no later than July 16, 2015; and,
3. Grant such other and further relief as the Commission considers just in the circumstances.

/s/ Whitney Payne

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served by electronic mail, or First Class United States Postal Mail, postage prepaid, on this 6th day of July, 2015, to all counsel of record.

/s/Whitney Payne