

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

In the Matter of the Application of Union	)	
Electric Company d/b/a Ameren Missouri	)	File No. ET-2025-0184
for Approval of New or Modified Tariffs	)	
for Service to Large Load Customers.	)	

**UNOPPOSED MOTION TO CANCEL AN ADDITIONAL DAY OF THE
EVIDENTIARY HEARING AND TO FURTHER EXTEND THE OBJECTION
DEADLINE FOR NON-UNANIMOUS STIPULATION
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Union Electric Company d/b/a/ Ameren Missouri, and for its Unopposed Motion to Cancel and Further Defer, states as follows:

1. On November 9, 2025, the Company and seven of the parties to this docket filed a Corrected Non-Unanimous Global Stipulation and Agreement (the “Stipulation”). Under the Stipulation’s terms, the signatory parties have waived cross-examination of each other’s witnesses during the evidentiary hearing (save only any cross-examination that might occur in response to questions from the bench).

2. On November 12, 2025, the parties met during the scheduled Settlement Conference. At that time, the Company and the Staff indicated to all parties that they had also reached an agreement in principle to resolve all of the issues in this case with the Staff. The Company and the Staff then began working with the signatories to the Stipulation to reduce the Company/Staff agreement to writing in a formal stipulation that would also include the Signatories to the Stipulation and thus supersede it.

3. The Signatories and Staff have exchanged documents and met on November 17, 2025, to discuss finalizing a superseding stipulation and are, as of this filing, finalizing a few details of such a stipulation and expect to have resolved all details today, November 18, 2025. The Signatories and Staff are also reviewing draft tariff sheets, which will be exhibits to the

superseding stipulation and which will reflect the superseding agreement's terms.

4. While the Signatories and Staff do expect to resolve all issues today, it will take until tomorrow to ensure that the agreed upon terms are accurately reflected in a formal superseding stipulation and to complete accurate tariff sheets reflecting the applicable terms.¹

5. Given the status of these activities and the significant reduction in cross-examination expected to occur during the evidentiary hearings, the parties² agree that the maximum number of days necessary to try this case if evidentiary hearings do occur would be two days. Consequently, such parties agree that it is unnecessary to hold hearings on Wednesday, November 19, 2025. This will allow proper completion of a superseding stipulation and for discussions to continue with the Office of the Public Counsel and, possibly, allow for an agreement with the Office of the Public Counsel by which no objection to the superseding stipulation is lodged. As noted in the prior motion seeking a suspension of the first two scheduled evidentiary hearing days, Evergy Metro's/Evergy West's similar case (File No. EO-2025-0154) had originally been scheduled for five days of evidentiary hearings but was fully tried in two days under circumstances similar to those existing in the present case but in that case, Staff was not a party to the non-unanimous stipulation that was in place in that case.

6. The parties³ also agree that the new deadline for non-signatories to object to the

¹ The Company has not reached any agreement with the Office of the Public Counsel but settlement discussions continue. The Empire District Electric Company has not participated in any settlement discussions, but its counsel has advised the undersigned counsel for the Company that it will not oppose the Stipulation or any amended or other stipulation that may be filed in this docket. The Signatories acknowledge that one of the Office of the Public Counsel's two witnesses has a mid-day conflict on Thursday, November 20, 2025, and agree to accommodate that conflict by taking the witness out of order if necessary either later in the day on November 20, 2025 or on Friday, November 21, 2025.

² With the exception of Empire – see prior footnote, and Office of the Public Counsel (who was unable to discern if two days would be sufficient because of a lack of understanding of other parties' cross-examination plans; the other parties do expect two days to be sufficient given their cross-examination plans).

³ Except Empire – see footnote 1, and the Office of the Public Counsel (who informed the undersigned counsel that OPC does not object to moving the objection deadline).

Stipulation (changed to today by the Commission's November 13, 2025, Order⁴) should be further extended to November 19, 2025, which will further assist in facilitating ongoing settlement discussions.

7. An expedited ruling on this Motion, no later than today, November 18, 2025, is requested. An expedited ruling will avoid the harm of using resources (hearing time and potentially time spent on stipulation objections) that would be consumed absent promptly granting the motion and will provide the benefit of facilitating further settlement discussions. This motion was filed as soon as it could have been under the circumstances.

WHEREFORE, the Company respectfully requests that the Commission cancel the November 19, 2025, evidentiary hearing in this case and extend the deadline for objections to the Stipulation to November 19, 2025, and that it order such relief no later than November 18, 2025.

Respectfully submitted,

/s/ James B. Lowery

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

/s/ Wendy K. Tatro

Wendy K. Tatro, Mo. Bar #60261
Director and Assistant General Counsel
Ameren Missouri
1901 Chouteau Avenue
St. Louis, MO 63103
Telephone: (314) 861-1705
Facsimile: (314) 554-4014
E-Mail: AmerenMOService@ameren.com

**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

⁴ Order Canceling the First Two Days of the Evidentiary Hearing and Extending the Time for Objections to the Non-Unanimous Stipulation and Agreement.

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on counsel of record for all parties to this docket via electronic mail (e-mail) on this 18th day of November, 2025.

/s/ James Lowery

James Lowery