

**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, for Permission	)	
and Approval and Certificates of Public Convenience	)	
and Necessity Authorizing it to Construct a New	)	File No. EA-2025-0238
Generation Facility and Battery Energy Storage	)	
System Facility.	)	

**MOTION TO SUSPEND PROCEDURAL SCHEDULE**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or the "Company"), on behalf of the parties to this case, and requests that the procedural schedule in this case be suspended pending drafting and submission of a definitive stipulation and agreement that will resolve all issues in this case, and, in this regard, states as follows:

1. Certain parties have reached an agreement in principle on all contested issues in this case, and the remaining parties have indicated that they will either become signatories to a stipulation reflecting those agreements or will not oppose the stipulation. Consequently, once the formal stipulation is completed and filed, it will be treated as unanimous under 20 CSR 4240-2.115.

2. The procedural schedule currently calls for the filing of Statements of Position tomorrow, January 27, 2026. The agreement to resolve all issues dispenses with the need to file those Statements.

3. Consequently, the parties request that the procedural schedule be suspended as soon as possible, and specifically, prior to the time Statements of Position would otherwise have been due.

4. Counsel for all parties have authorized the undersigned counsel for the Company to indicate that they support this Motion to Suspend.

**WHEREFORE**, the Company, on behalf of the parties, requests that the Commission make and enter its order suspending the procedural schedule as requested herein.

Respectfully Submitted,

/s/ **James B. Lowery**

**James B. Lowery**, Mo. Bar #40503

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**ATTORNEYS FOR UNION**

**ELECTRIC COMPANY d/b/a**

**AMEREN MISSOURI**

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on the Staff of the Missouri Public Service Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 26<sup>th</sup> day of January, 2026.

/s/ James B. Lowery  
James B. Lowery