## 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 the Issuance	)	
Of an Accounting Authority Order Relating to its	)	File No. EU-2012-0027
Electrical Operations.	)	

## **STATUS REPORT AND MOTION**

**COMES NOW** the Staff of the Missouri Public Service Commission (Staff), by and through the undersigned counsel, and on the Staff's behalf, and that of Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), the Office of the Public Counsel (OPC), the Missouri Industrial Energy Consumers (MIEC), and Barnes-Jewish Hospital (BJH), known collectively herein as "the Parties," files this *Status Report And Motion* and state as follows:

- 1. On December 8, 2011,<sup>1</sup> the Parties joined in a filing by Ameren Missouri of a *Motion For Extension Of Time To File Stipulation Of Facts*, requesting the Commission allow until December 14 for the filing of a stipulation of facts, full or partial, or for advising the Commission that an agreement on such a stipulation of facts cannot be reached.
- 2. On December 9, the Commission issued its *Order Extending Time For Stipulation*Or Status Report (Order). The Order directed the Parties to file a stipulation of facts, or a progress report on the stipulation of facts, by December 14.
- 3. The Non-Ameren Missouri Parties have been working towards merging an Ameren Missouri stipulation of facts and a Non-Ameren Missouri Parties stipulation of facts. The Non-Ameren Missouri Parties have reached agreement on their stipulation of facts. The Non-Ameren Missouri Parties are trying to reach a consensus position on each statement in Ameren Missouri's stipulation of facts. The Parties anticipate the need for discussions assuming

<sup>&</sup>lt;sup>1</sup> All dates hereafter refer to the calendar year 2011, unless otherwise specified.

the Non-Ameren Missouri Parties can reach consensus. Ultimately, if agreement can be reached regarding the Ameren Missouri stipulation of facts and the Non-Ameren Missouri Parties stipulation of facts, the Parties need to merge both stipulations of facts. To allow time for such discussions, the Parties request for the Commission to allow until December 22 to file a stipulation of facts.

- 4. Pursuant to the *Jointly Proposed Procedural Schedule* adopted by the Commission on October 28, the Parties have December 21 as the deadline for the filing of initial dispositive motions. The Parties request that the Commission allow until December 22 for the Parties to recommend new dates for the filing of dispositive motions, responses and replies to the dispositive motions.
- 5. The extension of time would not impede the remainder of the procedural schedule as adopted by the Commission.
  - 6. The Parties apologize for any inconvenience to the Commission.

**WHEREFORE**, the Staff, on behalf of the Parties, files this *Status Report And Motion* and requests that the Commission allow until December 22 (a) to file a stipulation of facts and (b) to recommend new dates for the filing of dispositive motions, responses and replies to the dispositive motions.

Respectfully submitted,

/s/ Steven Dottheim

Steven Dottheim, MO. Bar #29149 Chief Deputy Staff Counsel Phone (573) 751-7489 Facsimile (573) 751-9285 steve.dottheim@psc.mo.gov

Jennifer Hernandez, MO. Bar #59814

Associate Staff Counsel Phone (573) 751-8706 Facsimile (573) 751-9285 jennifer.hernandez@psc.mo.gov

Attorneys for the Staff of the Missouri Public Service Commission P.O. Box 360 Jefferson City, MO 65102

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document was served via e-mail on all counsel of record this  $14^{th}$  day of December, 2011.

/s/ Steven Dottheim