

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Tariffs to	)	<b><u>Case No. ER-2021-0240</u></b>
Increase Its Annual Revenues for	)	
Electric Service.	)	
	)	
In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Tariffs to	)	<b><u>Case No. GR-2021-0241</u></b>
Increase Its Annual Revenues for Gas	)	
Service.	)	

**MOTION TO MODIFY PROCEDURAL SCHEDULE TO  
REQUIRE POSITION STATEMENTS ON DECEMBER 2**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), by and through counsel, and on behalf of itself, Union Electric Company d/b/a Ameren Missouri, the Office of the Public Counsel, Missouri Industrial Energy Consumers, Midwest Energy Consumers Group, Renew Missouri Advocates, Legal Services of Eastern Missouri and the Missouri School Boards Association (collectively "Parties"),<sup>1</sup> and requests the Commission to grant leave for the Parties to file their respective Position Statements in these cases on Thursday, December 2, 2021, and to file the Final Reconciliation on Friday, December 3, 2021.

1. Position Statements in these cases are currently due Tuesday, November 30, 2021.

2. The Final Reconciliations in these cases are currently due Wednesday, December 1, 2021.

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<sup>1</sup> Staff requested approval or non-opposition from the remaining parties. Sierra Club indicated no opposition to the extension. Staff has not heard from the remaining parties on this specific motion. Staff files now, before hearing from all remaining parties, in the interest of obtaining a timely order.

3. On November 24, 2021, the parties filed a settlement of the revenue requirement in the electric rate case on which all parties to the electric rate case, except one, were signatories. The remaining party, the Sierra Club, has indicated that it will not oppose that stipulation, meaning it can be treated as unanimous under 20 CSR 4240-2.115. Additional settlement negotiations are currently ongoing and the Parties believe the current list of issues can be further narrowed, which could also narrow and simplify the Final Reconciliation.

4. Accordingly, the Parties have authorized Staff's counsel to file this motion requesting the Commission to modify the current procedural schedule by moving the Position Statement deadline from November 30 to December 2 and the Final Reconciliation from December 1 to December 3, 2021.

**WHEREFORE**, the Staff, on behalf of the Parties, requests the Commission to issue an order modifying the procedural schedule in these cases, moving the Parties' deadline to file Position Statements from November 30 to December 2, 2021, and to file the Final Reconciliation from December 1 to December 3, 2021, and for such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

**/s/ Curt Stokes**

Curt Stokes

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**Attorney for Staff of the Missouri  
Public Service Commission**

**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 30th day of November, 2021, to all parties and/or counsels of records.

**/s/ Curt Stokes**  
Curt Stokes