

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

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

**MOTION TO ACCEPT CORRECTIONS TO
STAFF WITNESS JOHN ROGERS' REBUTTAL TESTIMONY**

COMES NOW Staff of the Missouri Public Service Commission, by and through counsel, and hereby files its *Motion to Accept Corrections to Staff Witness Rogers' Rebuttal Testimony* ("*Motion*") regarding the prefiled rebuttal testimony, stating:

1. It has come to Staff's attention that there are a few minor errors in John Rogers' rebuttal testimony that should be corrected. The first is a typographical error in reference to the NPI performance mechanism on page 21, line 13 and page 23, line 5, where the acronym was erroneously labeled NPT. The errors are being corrected to properly show "NPI." Staff would also like to correct typographical errors on pages 26, 29, and 32. Line 12 of page 26 erroneously identifies a 29-year planning horizon and is being corrected to indicate a 20-year planning horizon. This change is consistent with the chart included in Staff's Schedule JAR-8. Line 9 on page 29 omitted the acronym "CC" in reference to the plant addition in 2034. The error is being corrected to state "MW CC in 2034." Line 2 of page 32 states the wrong dollar amount of \$4,573,536 and is being corrected to \$4,573,635. Finally, on page 22, line 5, Staff is changing "...through lower rates for the LGS rate class by 2019..." to state, "...through lower rates for the residential and LGS rate classes by 2019..."

2. Staff has corrected the errors indicated in paragraph 1 and with this *Motion* seeks leave to file the corrected pages 21, 22, 23, 26, 29, and 32 of

Mr. Rogers' testimony. The corrected pages are attached to this *Motion*. To avoid confusion about the corrected content of the testimony, Staff concurrently files redlined versions and clean versions of John Rogers' corrected rebuttal testimony clearly showing the corrections to his original-filed testimony.

3. The corrections in no way alter the conclusions made in Staff witness John Rogers' rebuttal testimony.

WHEREFORE, Staff respectfully Requests the Commission accept its *Motion to Accept Corrections to Staff Witness John Rogers' Rebuttal Testimony*.

Respectfully Submitted,

/s/ Marcella L. Mueth

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing were served electronically to all counsel of record this 17th day of April, 2015.

/s/ Marcella L. Mueth