

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

In the Matter of the Union Electric Company d/b/a )  
Ameren Missouri's Tariffs to Decrease Its ) File No. ER-2019-0335  
Revenues for Electric Service. )

**MOTION TO MODIFY PROCEDURAL SCHEDULE**

**COMES NOW** Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), on behalf of itself; the Staff of the Missouri Public Service Commission; Office of the Public Counsel ("OPC"); the Missouri Division of Energy, Missouri Industrial Energy Consumers; Midwest Energy Consumers Group; the Missouri Division of Energy; the Sierra Club, the National Resources Defense Council, Renew Missouri Advocates, and the Consumers Council of Missouri (collectively, the "Parties"), and for its *Motion to Modify Procedural Schedule*, states as follows:

1. On February 10, 2020, the Parties engaged in settlement discussions.

As a result of these discussions, the Parties (except the Sierra Club and NRDC) have agreed upon a settlement in principle on all revenue requirement issues with the exception of the Affiliate Transaction issue raised by OPC witness Robert Schallenberg, the Fuel Adjustment Clause ("FAC") sharing percentage issue raised by OPC witness Lena Mantle, and the issues raised by the Sierra Club. The Parties are still meeting to discuss rate design issues, but do not have an agreement on those issues at this time.

2. In anticipation of reducing the agreed-upon revenue requirement terms to a definitive settlement agreement, the Parties have authorized Ameren Missouri's counsel to file this motion and to request the Commission modify the procedural schedule in this case as set forth below:

- a. Suspend the requirement for surrebuttal testimony on revenue requirement issues except for on the above-referenced affiliate transaction, FAC sharing percentage, and Sierra Club issues. Surrebuttal on those listed issues would still be due on the Friday, February 14<sup>th</sup>;

- b. Move the due date for surrebuttal testimony on rate design issues to Tuesday, February 18<sup>th</sup>;
- c. Require surrebuttal workpapers from all parties to be provided one business day after surrebuttal testimony is filed (February 18<sup>th</sup> for revenue requirement testimony workpapers; February 19<sup>th</sup> for rate design testimony workpapers);
- d. Move the due date for the List of Issues to February 20<sup>th</sup>;
- e. No other date in the procedural schedule needs to change.

3. This motion does not address or request a modification of the testimony dates contained in the February 11, 2020 order from Commissioner Rupp.

**WHEREFORE**, Union Electric Company d/b/a Ameren Missouri, on behalf of itself, Staff of the Missouri Public Service Commission; Office of the Public Counsel; Missouri Division of Energy, Missouri Industrial Energy Consumers; Midwest Energy Consumers Group; Missouri Division of Energy; Sierra Club, National Resources Defense Council, Renew Missouri Advocates, and the Consumers Council of Missouri, requests the Commission issue an order adopting the above-stated procedural schedule changes and ordering such other and further relief as the Commission deems just in the circumstances.

Respectfully submitted,

UNION ELECTRIC COMPANY  
D/B/A AMEREN MISSOURI

/s/ Wendy K. Tatro

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic mail (e-mail) to all parties of record on this 11<sup>th</sup> day of February, 2020.

/s/ Wendy K. Tatro  
Wendy K. Tatro