

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

Earth Island Institute d/b/a)	
Renew Missouri, et al.)	
)	
Complainants,)	
)	
v.)	File No. EC-2013-0381
)	
Union Electric Company d/b/a)	
Ameren Missouri,)	
)	
Respondent.)	

**JOINT MOTION TO SUSPEND THE PROCEDURAL SCHEDULE
AND
JOINT MOTION FOR EXPEDITED TREATMENT**

COME NOW, Earth Island Institute d/b/a Renew Missouri (“Renew Missouri”), Missouri Coalition for the Environment (“MCE”), Missouri Solar Energy Industry Association (“MOSEIA”), Missouri Solar Applications, LLC, The Alternative Energy Company, LLC, StraightUp Solar, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), the Staff of the Missouri Public Service Commission (“Staff”), Office of the Public Counsel (“OPC”), and Missouri Industrial Energy Consumers (“MIEC”) (collectively “Joint Movants”) and pursuant to 4 CSR 240-2.080, request that the Commission suspend the procedural schedule as it relates to Renew Missouri’s complaint against Ameren Missouri, pending consideration of the Non-Unanimous Stipulation And Agreement filed in Case No. EC-2013-0381.

1. 1. On October 10, 2013, Renew Missouri and other Complainants, Ameren Missouri, Staff, and MIEC filed a Non-Unanimous Stipulation and Agreement (“Agreement”) which resolves the issues in Case No. EC-2013-0381. As a part of the Agreement, Renew Missouri has agreed to dismiss its Complaints against Ameren Missouri in this case if the Commission approves the Agreement.

2. Under the procedural schedule approved in this case, filings pertaining to list of issues, list of witnesses, order of cross and order of opening statements is due by October 10, 2013. Therefore, it is important for the Commission to suspend the procedural schedule on October 10, 2013, as requested herein, to avoid the necessity of making these filings in a case that may be dismissed in the near future.

WHEREFORE, for all of the reasons stated above, Joint Movants ask the Commission to suspend the procedural schedule as it relates to the Complaint against Ameren Missouri pending consideration of the Non-Unanimous Stipulation And Agreement in Case No. EC-2013-0381. In addition, the Joint Movants request that the Commission grant this motion before the October 10, 2013 filing deadline, and to further grant Joint Movants such other relief as the Commission deems appropriate.

Respectfully submitted,

EARTH ISLAND INSTITUTE d/b/a
RENEW MISSOURI, et. al.

/s/

Andrew J. Linhares, # 63973
910 E Broadway, Ste. 205
Columbia, MO 65203
Andrew@renewmo.org
(314) 471-9973 (phone)
(314) 558-8450 (facsimile)
ATTORNEY FOR COMPLAINANTS

THE STAFF OF THE MISSOURI
PUBLIC SERVICE COMMISSION

/s/

Jennifer Hernandez, # 59814
P. O. Box 360
Jefferson City, MO 65102
jennifer.hernandez@psc.mo.gov
(573) 751-8706 (phone)
(573) 751-9285 (facsimile)

UNION ELECTRIC COMPANY d/b/a
AMEREN MISSOURI

/s/

Wendy K. Tatro, # 60261
1901 Chouteau Avenue, MC 1310
P.O. Box 66149
St. Louis, MO 63166-6149
amerenmoservice@ameren.com
(314) 554-3484 (phone)
(314) 554-4014 (facsimile)

MISSOURI INDUSTRIAL ENERGY
CONSUMERS

/s/

Edward f. Downey, # 28866
221 Bolivar Street, Suite 101
Jefferson City, MO 65101
efdowney@bryancave.com
(573) 556-6622 (phone)

OFFICE OF THE PUBLIC COUNSEL

/s/

Lewis R. Mills, Jr., # 35275

P.O. Box 2230

Jefferson City, MO 65102

lewis.mills@ded.mo.gov

(573) 751-1304 (phone)

(573) 751-5562 (facsimile)

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been submitted via the Public Service Commission's Electronic Filing and Information System ("EFIS") and transmitted by electronic mail to all counsel of record this 10th day of October, 2013.

/s/ Andrew J. Linhares

Andrew J. Linhares