

**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 Permission and	)	
Approval and a Certificate of Public Convenience and	)	EA-2016-0208
Necessity Authorizing it to Offer a Pilot Distributed	)	
Solar Program and File Associated Tariff.	)	

**JOINTLY PROPOSED PROCEDURAL SCHEDULE**

COME NOW Union Electric Company d/b/a Ameren Missouri (Company or Ameren Missouri), the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (OPC), United For Missouri (UFM), the Missouri Industrial Energy Consumers (MIEC), Earth Island Institute d/b/a Renew Missouri (Renew Missouri), Wal-Mart Stores, Inc. (Wal-Mart), and Brightergy, Inc. (Brightergy), being all the parties to this case, and hereby submit this Jointly Proposed Procedural Schedule, and in support thereof state as follows:

1. The parties to this case have reached agreement on a proposed procedural schedule, which is reflected herein. The parties request that the Commission adopt the procedural schedule set forth in paragraph 2 below, and also adopt the related procedural items that have been agreed upon, as reflected in paragraph 3 below.

2. The Proposed Procedural Schedule is as follows:

**Procedural Schedule**

Non-Company Parties File Rebuttal Testimony	August 18, 2016
Data Request Response Time Shortened to 10 days (5 business days to object/give notice of need for more time)	August 18, 2016
Company Files Surrebuttal/Other Parties' File Cross-Surrebuttal Testimony	September 15, 2016
Data Request Response Time Shortened to 5 days (2 business days to object/give notice of need for more time)	September 15, 2016

Last day to Request Discovery	September 26, 2016
Deadline to File List of Issues, List of Witnesses, Order of Cross-Examination and Order of Opening Statements	September 30, 2016
Deadline to File Statements of Position	October 6, 2016
Evidentiary Hearings	October 11 – 13, 2016
Deadline to File Initial Briefs	October 28, 2016
Deadline to File Reply Briefs	November 11, 2016

3. The parties to this pleading have also agreed to the following procedures and request the Commission order these agreed-to procedures be included in the Commission's Order setting the Procedural Schedule for this case:

(a) All parties shall provide copies of testimony (including schedules), exhibits and pleadings to other counsel by electronic means and in electronic form essentially concurrently with the filing of such testimony, exhibits or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

(b) Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests, objections to data requests and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of Ameren Missouri data request responses, Ameren Missouri shall post its data request responses on its Caseworks Extranet site; however, in the case of responses to data requests Staff issues to it, Ameren Missouri shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.)

(c) If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to (except that, with the exception of responses to Staff, responses will not be needed for Ameren Missouri data request responses posted on the Company's Caseworks Extranet site).

(d) Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing highly confidential or proprietary information shall be appropriately marked.

(e) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. With the exception of workpapers provided to Staff, Ameren Missouri may provide workpapers by posting the same on its Caseworks Extranet site, with e-mail notification to counsel for the parties to be provided essentially concurrently with the posting of workpapers on the Extranet site. Ameren Missouri shall provide its workpapers to Staff in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.

(f) Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

(g) All data requests, subpoenas, or other discovery requests or notices shall be issued no later than September 26, 2016. With respect to deposing a witness, so long as a notice of deposition is issued by September 26, 2016, the deposition may occur so long as it is scheduled on or before October 7, 2016.

(h) All motions to compel a response to any discovery request shall be filed no later than October 3, 2016.

WHEREFORE, the parties file the Jointly Proposed Procedural Schedule set forth in paragraph 2 above, and request that the Commission adopt the same and include in its order its adoption of the procedural items requested by the parties in paragraph 3 above.

Respectfully submitted,

/s/ James B. Lowery

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### **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing has been e-mailed, this 21st day of June, 2016, to counsel for all parties of record.

/s/ James B. Lowery