

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

In re: Union Electric Company's)	
2011 Utility Resource Filing pursuant to)	File No. EO-2011-0271
4 CSR 240 – Chapter 22.)	

ISSUES AND WITNESS LIST,
ORDER OF OPENING STATEMENTS,
ORDER OF CROSS-EXAMINATION, AND MOTION FOR LEAVE TO LATE-FILE

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), and on behalf of itself and the Staff of the Missouri Public Service Commission ("Staff"), the Office of the Public Counsel ("OPC"), the Missouri Department of Natural Resources ("MDNR"), the Natural Resources Defense Council (NRDC), Sierra Club, Renew Missouri, Mid-Missouri Peaceworks and the Great Rivers Environmental Law Center (collectively, "NRDC") and hereby state their Joint List of Issues and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination, and also hereby move for leave to late-file the same:

LIST OF ISSUES

1. *Is Ameren Missouri in compliance with each of the Missouri Public Service Commission (Commission) Electric Utility Resource Planning regulations found at 4 CSR 240-22.010, et seq.?*
2. *If Ameren Missouri is not in compliance, is the proposed remedy lawful and appropriate?*

Appendix A to the Joint Pleading filed on August 8, 2011, contains a list of alleged deficiencies and concerns along with the proposed remedy for each. One deficiency has been withdrawn since the August filing, MDNR's deficiency #7 (See the rebuttal testimony of DNR witness Adam Bickford).

The following is a list indicating which witnesses have testimony on each section of the Commission's IRP rules¹.

4 CSR 240-22.010 Policy Objectives

Ameren Missouri - Warren Wood and Matt Michels

Staff – John A. Rogers

OPC – Ryan Kind

MDNR – John Noller

4 CSR 240-22.030 Load Analysis and Forecasting

Ameren Missouri–Steve Wills

Staff – David C. Roos

4 CSR 240-22.040 Supply-Side Resources Analysis

Ameren Missouri - Matt Michels

Staff – Leon C. Bender

MDNR– John Noller

OPC – Ryan Kind

4 CSR 240-22.050 Demand-Side Resource Analysis

Ameren Missouri–Rick Voytas

Staff – Hojong Kang and Randy Gross

MDNR– Adam Bickford

OPC – Ryan Kind

¹ Per the Commission's September 19, 2011, Order Establishing Procedural Schedule "The following documents previously filed in this case shall be treated as prefiled for purposes of being offered as evidence at the hearing: A. Ameren Missouri's Integrated Resource Plan filed February 23, 2011; B. The reports and comments filed June 23, 2011, i.e., the comments of Grain Belt Express Clean Line, LLC; the joint comments and reply of Natural Resources Defense Council, Sierra Club, Renew Missouri, Mid-Missouri Peaceworks, and Great Rivers Environmental Law Center; the comments of the Missouri Department of Natural Resources; the report of the Office of the Public Counsel (as substituted on June 27, 2011, and corrected on July 22, 2011); the Staff Report (as corrected on June 27, 2011); C. Ameren Missouri's August 22, 2011 response to the reports and comments (with revised appendix A filed on September 1, 2011).

4 CSR 240-022.060 Integrated Resource Analysis

Ameren Missouri - Matt Michels

Staff –Matthew J. Barnes

MDNR – John Noller and Adam Bickford

OPC – Ryan Kind

4 CSR 240-22.070 Risk analysis and Strategy Selection

Ameren Missouri - Warren Wood and Matt Michels

Staff – John A. Rogers

MDNR– John Noller

OPC – Ryan Kind

4 CSR 240-22.080 Filing Schedule and Requirements

Ameren Missouri - Matt Michels

OPC – Ryan Kind

ORDER OF OPENING STATEMENTS

Ameren Missouri

Staff

NRDC

MDNR

OPC

ORDER OF WITNESSES

Ameren Missouri

Warren Wood

Rick Voytas (not available prior to 10:30 on December 15th)

Matt Michels

Staff

David C. Roos

Leon C. Bender

Hojong Kang

Randy S. Gross

Matthew J. Barnes

John A. Rogers

MDNR

Adam Bickford

John Noller

OPC

Ryan Kind

ORDER OF CROSS EXAMINATION

Ameren Missouri's witnesses	Staff's witnesses	NRDC's witnesses	OPC's witnesses	MDNR's witnesses
Staff	NRDC	Staff	Staff	Staff
NRDC	MDNR	MDNR	NRDC	NRDC
MDNR	OPC	OPC	MDNR	OPC
OPC	Ameren Missouri	Ameren Missouri	Ameren Missouri	Ameren Missouri

MOTION FOR LEAVE TO LATE-FILE

Under the Commission's Order Establishing Procedural Schedule issued on September 19, 2011, the Joint List of Issues and Order of Witnesses, Order of Opening Statements and Order of Cross-Examination was due December 12, 2011. On that date, the Staff filed a motion to extend the

due date to December 13, 2011. The Commission granted that motion. While the parties reached agreement in principle on this filing on December 13, 2011, the Staff was unable to obtain final approval from Staff management to join in the pleading until earlier this morning. Staff has now indicated that it has that approval. We apologize for any inconvenience the slight delay in making this filing may cause the Commission, and request leave to make this filing a few hours out of time.

WHEREFORE, Ameren Missouri on behalf of itself, Staff, NRDC, MDNR and OPC asks the Commission to accept this pleading in fulfillment of the Commission's Order Establishing Procedural Schedule issued on September 19, 2011.

Respectfully submitted,

UNION ELECTRIC COMPANY,
d/b/a Ameren Missouri

/s/ *Wendy K. Tatro*

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Dated December 14, 2011

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing Joint Filing was served on all parties of record via electronic mail (e-mail) on this 14th day of December, 2011.

/s/ Wendy K. Tatro

Wendy K. Tatro