## 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 Necessity Authorizing it to Construct a Wind Generation Facility.

) ) File No. EA-2018-0202 )

## **MOTION TO MODIFY STIPULATION**

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COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri" or "Company"), and hereby requests the Commission issue its order approving a minor modification to the requirements of ¶ 6 of the Third Stipulation and Agreement ("Stipulation") filed in this case and approved by the Commission by its *Order Approving Third Stipulation and Agreement* and, in support of its request, states as follows:

1. Paragraph 6 Stipulation contemplates that the Company will "file" the complete plans and specifications.

2. The Company recently received those complete plans and specifications which consist of several dozen individual files which, if they are to be "filed" would either require Company personnel to engage in the time-consuming task of uploading the files into EFIS, or if the Company submitted the files to the Data Center on a CD or DVD would require Data Center personnel to do the same.

3. The Staff is the party that requested the Stipulation contain the provision at issue and, upon inquiry, the Staff has indicated that it is amenable to the Company *providing* the plans and specifications on a CD or DVD and to an amendment of the Stipulation allowing it to do so in lieu of filing the same.

4. The Company has also polled counsel for the other parties to this case, all of whom have indicated that they do not object to such an amendment.

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5. Consequently, the Company requests that the Commission issue an order

modifying the obligation reflected in the last sentence of ¶ 6 of the Stipulation so that the

obligation is as follows:

Ameren Missouri will provide complete plans and specifications to the Staff prior to commencement of construction.

WHEREFORE, Ameren Missouri requests the Commission issue its order

modifying the above-described obligation as specified in  $\P$  5 of this Motion.

Respectfully submitted:

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## **CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing document was served on all parties of record via electronic mail (e-mail) on this 20th day of September, 2019.

## /s/James B. Lowery