

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

In the Matter of Union Electric Company d/b/a)
Ameren Missouri’s 2nd Filing to Implement) File No. EO-2015-0055
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

UNOPPOSED MOTION TO RESCHEDULE EVIDENTIARY HEARINGS

COMES NOW Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company), and hereby requests that the Commission reschedule the evidentiary hearings that are currently scheduled to begin one week from today, on May 27, 2015, and in support of its request states as follows:

1. This case involves the Company’s second effort to provide demand-side programs under MEEIA,¹ and was initiated by the Company’s request to approve a portfolio of ten different programs and a demand-side investment mechanism (“DSIM”) arising from the programs (collectively the “Plan”). The Plan was proposed to operate from 2016 to 2018, and can generally be referred to as the Company’s MEEIA 2 Plan because it follows a three-year cycle of programs and a related DSIM approved by the Commission in 2012, for programs operating from 2013 to 2015, which was generally referred to as the Company’s MEEIA 1 Plan.

2. While the Company and the parties have gained valuable experience with MEEIA programs through the operation of the MEEIA 1 Plan over the past approximately 17 months, relative to the traditional paradigm of investing in supply-side resources and using load growth to help spread the costs of those investment and other costs of service, Missouri is still a relative newcomer to substantial use of demand-side programs to reduce customer loads. Consequently, the parties

¹ Missouri Energy Efficiency Investment Act, §393.1075, RSMo. (Cum. Supp. 2013).

continue to grapple with various issues raised by the implementation of demand-side programs and by the MEEIA statute itself.

3. To that end, settlement discussions have been occurring and continue to occur. Certain parties have requested additional information that requires analysis and compilation and that cannot be provided for several more days. Settlement discussions have also identified issues, and potential opportunities to resolve them, that will require additional time, thought and effort to address. Some of these issues are complex and technical and lend themselves to collaboration rather than litigation, unless the litigation simply cannot be avoided. The Company believes that collaboration may be able to lead to a resolution of the issues in a way that may avoid the need for a litigated hearing, or that at least could narrow the issues such a hearing would need to resolve. These efforts cannot be completed in the three business days existing between now and May 27.

4. Consequently, the Company approached the other parties and indicated that the Company would provide the additional information and additional proposals in an attempt to resolve issues in this case, but that it could not both do so in a timely fashion and prepare for and participate in evidentiary hearings starting next week. The Company suggested rescheduling the evidentiary hearings to July 20-22, 2015,² coupled with prompt and earnest efforts to attempt to resolve the case without the need for evidentiary hearings. Counsel for the Staff, Office of the Public Counsel and the Division of Energy have all indicated that they affirmatively support the rescheduling the hearings to July 20-22, 2015. Counsel for all of the other parties³ have indicated that they do not oppose rescheduling the hearings to those dates. Moreover, it is the Company's belief, based on

² The Company had originally suggested rescheduling the hearing to July 15,-17, 2015, which would have been the first available dates after the scheduled Kansas City Power & Light Company rate case evidentiary hearing dates that will allow parties also engaged in that case to properly prepare, if necessary, for such hearings. A party had a conflict on those dates, and July 20-22 was proposed. All parties have confirmed their witnesses' availability on July 20-22.

³ The other parties are the MIEC, Brightergy, Sierra Club, Natural Resources Defense Council, United for Missouri, Renew Missouri, National Housing Trust and Tower Grove Neighborhoods Community Development Corporation.

communications from many if not most of the other parties that the parties are all interested in continuing to attempt to work through the issues in this case, without the need for hearings, if possible. Rescheduling the hearings will afford the ability to continue to pursue those efforts. To that end, the Company has agreed to meet (either in person in Jefferson City or by phone) with the parties on May 28, 2015 and weekly thereafter until either a resolution of the case by settlement is reached or the parties determine that a resolution of the case by settlement cannot be reached, and has agreed that unless otherwise agreed by the parties, such a settlement must be reached by June 30, 2015.

WHEREFORE, the Company hereby requests that the Commission reschedule the evidentiary hearings in this case to July 20-22, 2015.

Respectfully submitted,

/s/ James B. Lowery
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**ATTORNEYS FOR UNION ELECTRIC
COMPANY d/b/a AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was sent by electronic transmission, facsimile or email to counsel for parties in this case on this 21st day of May, 2015.

/s/ James B. Lowery