

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

In the Matter of Union Electric Company)	
d/b/a Ameren Missouri's Tariffs to)	<u>Case No. ER-2012 0166</u>
Increase Its Annual Revenues for)	
Electric Service.)	

**STAFF'S RESPONSE TO AMEREN MISSOURI'S
MOTION TO CANCEL OR RESCHEDULE DISCOVERY
CONFERENCE**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and for its response to Ameren Missouri's *Motion to Cancel or Reschedule Discovery Conference*, states as follows:

1. The undersigned will also be involved in the evidentiary hearing in Case No. EO-2012-0074 on June 21, 2012.

2. Nonetheless, Staff urges the Commission to not cancel the Discovery Conference in this case, but to take it up during a recess in the EO-2012-0074 hearing. There are emerging discovery issues in this case that must be addressed before Staff files its Revenue Requirement Direct Testimony and Report on July 6, 2012.

3. If it is not feasible to conduct the Discovery Conference during a recess in the proceedings in EO-2012-0074, Staff and Ameren Missouri are both able to provide other counsel on that day. Both matters can thus proceed simultaneously.

4. The Discovery Conference is a recent development in Commission practice. The undersigned finds that this device has had a salutary effect on the

Staff's ability to timely acquire the information necessary to present its case. While Staff is sympathetic with the quandary in which counsel for Ameren Missouri find themselves, and indeed the undersigned is in the same position, nonetheless, Staff considers it to be of great importance that this Discovery Conference go forward as scheduled.

WHEREFORE, Staff urges the Commission to deny Ameren Missouri's *Motion to Cancel or Reschedule Discovery Conference* and to instead go forward pursuant to the Procedural Schedule adopted by the Commission.

Respectfully submitted,

s/ Kevin A. Thompson
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Certificate of Service

I hereby certify that a true and correct copy of the foregoing was served, either electronically or by hand delivery or by First Class United States Mail, postage prepaid, on this **14th day of June, 2012**, to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

s/ Kevin A. Thompson