

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

In the Matter of Union Electric Company	)	
d/b/a Ameren Missouri's Permission and	)	
Approval and a Certificate of Public	)	
Convenience and Necessity Authorizing it to	)	<b><u>File No. EA-2014-0136</u></b>
Construct, Install, Own, Operate, Maintain and	)	
Otherwise Control and Manage Solar	)	
Generation Facilities in O'Fallon, Missouri	)	

**PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** Earth Island Institute d/b/a Renew Missouri ("Renew Missouri"), by and through the undersigned counsel, and hereby submits this *Proposed Procedural Schedule*. The Staff for the Missouri Public Service Commission ("Staff"), the Office of the Public Council ("OPC"), the Missouri Division of Energy, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") and the Missouri Industrial Energy Consumers ("MIEC") do not object to this procedural schedule. In support hereof, Renew Missouri states as follows:

1. On January 13, 2014, Ameren Missouri filed an application for a certificate of public convenience and necessity ("CCN") authorizing Ameren Missouri to construct, install, own, operate, maintain and otherwise control and manage solar generation facilities in O'Fallon Missouri.

2. On February 6, 2014, the Commission issued an *Order Granting Interventions and Order Setting a Prehearing Conference* for February 19, 2014.

3. During the Prehearing Conference held on February 19, 2014, Regulatory Law Judge Pridgin requested the Parties file a proposed procedural schedule by February 26, 2014. After discussions among the Parties, one or more parties have expressed

concerns regarding the costs and designs of Ameren Missouri's proposed solar generation facilities for which Ameren Missouri now seeks a certificate of public convenience and necessity ("CCN"). Moreover, Ameren Missouri's proposed facilities are the first "utility-scale" solar generation facilities proposed by an investor-owned utility in the State of Missouri, and this case may have potential precedential value.

4. The Parties agree to stipulate that Ameren Missouri's January 13, 2014 application shall be considered the Direct Testimony on behalf of Ameren Missouri.

5. Renew Missouri proposes the following procedural schedule:

**Event Dates**

Rebuttal Testimony filed	March 17
Surrebuttal Testimony	March 31
List of Issues	April 1
Statements of Position, Order of Witnesses, Order of Cross Examination	April 2
Hearing	April 4

6. The Parties agree to make closing arguments at hearing in place of post-hearing briefs.

7. To accommodate this procedural schedule on an expedited basis, the Parties agree to shorten the response time pursuant to Rule 4 CSR 240-2.090 for all data requests to five (5) business days to respond and three (3) business days to object.

8. Renew Missouri requests that the Commission adopt the procedural schedule set forth above. The Parties request that the Commission adopt the following related procedural items agreed upon by the Parties:

(a) 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 Commission’s Electronic Filing and Information System (“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. If responding to a Staff data request, the responding party shall record the response in EFIS and send an email notification to Staff Counsel that such party has filed the response. For all other Parties, data request responses will be available on Ameren Missouri’s extranet site and Ameren Missouri will send an email notification to the requesting party that it has posted a response.

(b) An effort should be made to not include in data request questions either highly confidential or proprietary information. If either highly confidential or proprietary information must be included in data request questions, the highly confidential or proprietary information should be appropriately designated as such pursuant to 4 CSR 240-2.135.

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

**WHEREFORE**, Renew Missouri files this *Proposed Procedural Schedule*, as requested by the Regulatory Law Judge Pridgin, and request the Commission order a procedural schedule as proposed herein.

Respectfully submitted,

/s/ Andrew J. Linhares  
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ATTORNEY FOR EARTH ISLAND  
INSTITUTE d/b/a RENEW MISSOURI

**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 26<sup>th</sup> day of February, 2014 to all counsel of record in this proceeding.

/s/ Andrew J. Linhares