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 of a Certificate of Public Convenience and)	File No. EA-2016-0208
Necessity Authorizing it to Offer a Pilot Distributed)	
Solar Program and File Associated Tariff.)	

MOTION FOR PROCEDURAL CONFERENCE

COMES NOW the Office of the Public Counsel ("OPC" or "Public Counsel") and requests a procedural conference, stating:

- 1. On April 27, 2016, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri") filed its *Application for a Blanket Certificate of Public Convenience and Necessity* ("CCN Application") authorizing it to "construct, install, own, operate, maintain and otherwise control and manage various solar generation facilities in its service territory." (Doc. No. 18).
- 2. The Commission issued an order establishing an intervention deadline of May 20, 2016 (Doc. No. 21). The same order directed the Commission's Staff to file a recommendation by June 23, 2016. At present, several parties have applied for intervention.
- 3. Based on the information currently available to it, Public Counsel believes it is appropriate to convene a prehearing conference to discuss a procedural schedule for this case. Commission Rule 4 CSR 240-2.090(4) provides that any party may petition the Commission to hold a prehearing conference. At a prehearing conference, parties may consider procedural and substantive matters which may aid in the disposition of the issues. Commission Rule 4 CSR 240-2.090(6).

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¹ On the same day Ameren Missouri filed its CCN Application in this case, it filed tariff sheets for a subscriber-based pilot related to potential solar generation in Case No. EA-2016-0207. These cases are separate and distinct and should not be consolidated. In that case, Public Counsel has requested the Commission schedule a procedural conference on May 13, 2016.

4. Public Counsel requests the Commission schedule a prehearing conference on May 23, 2016.

WHEREFORE Public Counsel requests that the Commission convene a prehearing conference for the purpose of developing a proposed procedural schedule in this case.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

/s/ Tim Opitz

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 4th day of May 2016:

/s/ Tim Opitz