



3. While the testimony of the Joint Movants and other parties will not be filed until December, it is reasonable to expect that Ms. Barnes' proposal will be contested. In fact, all of the Joint Movants independently intend to oppose that proposal.

4. By notice emailed to the PSC Docket Mailing List on Thursday, October 27, Joint Movants became aware that the Commission has scheduled a presentation by MISO on November 2. No details about the specific subject of the presentation were provided. However, it is entirely possible that the presentation will address the value of Ameren's participation in MISO, the level of cost to Ameren of such participation, or the volatility of the cost. These matters involve contested issues that the Commission will need to decide based upon the record evidence in this case.

5. There is no reason for presentation to the Commission of extra-record information relating to contested issues during the pendency of this rate increase case. Joint Movants request that the Commission cancel the presentation just noticed for November 2, and reschedule it for some time after this case has been decided. In the alternative, and without waiving any objection to the presentation, Joint Movants request that the presentation be recorded and all parties have an opportunity to provide responses in this case.

6. Pursuant to 4 CSR 240-2.080(14), Joint Movants request that the Commission rule upon this request before the scheduled date of the presentation: November 2. The harm that will occur if the Commission does not expeditiously cancel the presentation is that Joint Movant's right to fair hearing on the contested issues in this case, and to a decision on those issues based upon the record in this case, may be compromised. Joint Movants state that this motion has been filed as quickly as possible after notice of the presentation was emailed to the PSC Docket mailing list.

WHEREFORE, Joint Movants respectfully request that the Commission expeditiously cancel the MISO presentation scheduled for November 2, or in the alternative, record such presentation and allow the opportunity for all parties in this case to respond.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the foregoing document has been emailed this 31st day of October, 2016, to all parties on the Commission's service list in this case.

/s/ Diana Vuylsteke