

**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)
Necessity Authorizing it to Offer a Pilot Distributed)
Solar Program and File Associated Tariff)

File No. EA-2016-0208

STAFF’S MOTION FOR RELIEF FROM ORDER DIRECTING RECOMMENDATION

COMES NOW, the Staff of the Missouri Public Service Commission (“Staff”) and moves the Commission to relieve it from the Commission’s April 28, 2016 *Order Directing Notice, Setting Intervention Deadline, and Directing Filing of Staff Recommendation*.

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.”

2. The Commission issued an order establishing an intervention deadline of May 20, 2016. The same order directed the Commission’s Staff to file a recommendation by June 23, 2016.

3. On May 4, 2016, the Office of Public Counsel (“OPC”), supported by Staff in a separate filing dated May 6, 2016, requested a procedural conference. The Commission granted this motion on May 11, 2016 and ordered an off the record procedural conference be held on May 24, 2016.

4. A procedural conference was held on May 24, 2016, in which parties scheduled several technical conferences to discuss tariffs, implementation and accounting. These conferences will be held in July 2016 for all parties.

5. On June 21, 2016, a *Jointly Proposed Procedural Schedule* was filed by all parties. August 18, 2016 is the date set for non-company parties to file rebuttal testimony.

6. In light of the proposed procedural schedule, Staff anticipates providing its recommendation to the Commission by joining an agreement, by opposing an agreement or in its testimony due on August 18, 2016.

WHEREFORE, Staff moves the Commission to relieve Staff from its obligation to file its recommendation by June 23, 2016, and allow Staff to present its findings and recommendation in its testimony on August 18, 2016, if no earlier agreement can be reached.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed with first-class postage, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 21st day of June, 2016.

/s/ Nicole Mers