BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of the Application of Union Electric Company d/b/a Ameren Missouri for Permission and Approval and a Certificate of Public Convenience and Necessity Authorizing it to Construct a Wind Generation Facility.

Case No. EA-2018-0202

OBJECTION TO FILED STIPULATION AND AGREEMENT

COMES NOW, the Office of the Public Counsel, (OPC) by and through counsel, and states as follows:

1. On August 17, 2018, Ameren Missouri circulated a proposed stipulation and agreement based on the input of the Staff of the Public Service Commission (Staff), but no other party. The OPC and other parties were informed that they had little more than two and half hours to agree to this Stipulation and Agreement before it would be filed.

2. Staff agreeing to the Stipulation and Agreement's language before non-utility parties have filed rebuttal testimony and before the local public hearing, runs counter to Staff's role as a neutral party.

WHEREFORE, the OPC objects to the entirety of the Stipulation and Agreement as agreed to by Staff and Ameren Missouri.

Respectfully,

OFFICE OF THE PUBLIC COUNSEL

<u>/s/ Ryan Smith</u> Ryan Smith, #66244 Senior Counsel <u>Ryan.smith@ded.mo.gov</u>

<u>/s/ Caleb Hall</u> Caleb Hall, #68112 Senior Counsel <u>Caleb.hall@ded.mo.gov</u>

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Attorneys for the Office of the Public Counsel

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 20th of August, 2018, with notice of the same being sent to all counsel of record.

/s/ Ryan Smith /s/ Caleb Hall