

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.)

COMES NOW the Office of Public Counsel (“OPC” or “Public Counsel”) on behalf of itself, the Commission’s Staff (“Staff”), and Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) and submits their proposed *Statement of Contested Issues, List of Witnesses, Order of Cross-examination, and Order of Opening Statements* as follows¹:

Issue 1: Do the terms contained in the *Non-unanimous Stipulation and Agreement* (now a Joint Position statement) present a plan meeting the requirements set forth in the CCN statute, section 393.170 RSMo?

Issue 2: Does the evidence establish that Ameren Missouri’s proposed project as presented in the *Non-unanimous Stipulation and Agreement* (now a Joint Position statement), for which it seeks a CCN, “necessary or convenient for the public service” within the meaning of section 393.170, RSMo?

Issue 3: Does the evidence demonstrate the company has provided the information required to comply with the Commission’s rules at 4 CSR 240-3.105?

Issue 4: Does the evidence show that good cause exists to support a waiver of the Commission’s rules at 4 CSR-3.105?

Issue 5: Is the company’s plan outlining treatment of the proposed facilities at the end of 25 years lawful under 393.190 RSMo?

1

Hearing schedule

Monday, October 17, 2016:

9:00 A.M. Preliminary Matters

Mark Exhibits.

Entries of Appearance.

Motions and Outstanding Matters.

10:00 A.M. Opening Statements

Opening Statements order

- 1) Ameren Missouri
- 2) Staff
- 3) Division of Energy (“DE”)
- 4) Renew Missouri (“Renew”)
- 5) United for Missouri (“UFM”)
- 6) Walmart
- 7) Brightergy
- 8) Missouri Industrial Energy Consumers (“MIEC”)
- 9) OPC

Order of Witnesses

Ameren Missouri

- Mr. Harding
 - o Cross order: Staff, DE, Renew, UFM, Walmart, Brightergy, MIEC, OPC
- Mr. Barbieri
 - o Cross order: Staff, DE, Renew, UFM, Walmart, Brightergy, MIEC, OPC

Staff

- Ms. Eubanks
 - o Cross order: Ameren Missouri, DE, Renew, UFM, Walmart, Brightergy, MIEC, OPC

Division of Energy

- Mr. Hyman
 - o Cross order: Ameren Missouri, Staff, Renew, UFM, Walmart, Brightergy, MIEC, OPC

Walmart

- Mr. Chriss²
 - o Cross order: Ameren Missouri, Staff, DE, Renew, UFM, Brightergy, MIEC, OPC

Brightergy

- Ms. Oakley
 - o Cross order: Ameren Missouri, Staff, DE, Renew, UFM, Walmart, MIEC, OPC

OPC

- Mr. Burdge
 - o Cross order: MIEC, Brightergy, Walmart, UFM, Renew, DE, Staff, Ameren Missouri

WHEREFORE Public Counsel on behalf of itself, the Commission's Staff, and Ameren Missouri, submits this *Statement of Contested Issues, List of Witnesses, Order of Cross-examination, and Order of Opening Statements*.

Respectfully,

/s/ **Tim Opitz**

Tim Opitz #65082

Senior Counsel

PO Box 2230

Jefferson City MO 65102

Telephone: (573) 751-5324

Fax: (573) 751-5562

Timothy.opitz@ded.mo.gov

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all counsel of record this 11th day of October 2016:

/s/ Tim Opitz

² Mr. Chriss will testify on Tuesday October 18th.