

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI**

In the Matter of a Working Case to Draft a Rule to)
Revise Commission Rule 4 CSR 240-3.105) **File No. EW-2014-0239**

**STAFF'S RESPONSE TO AMEREN MISSOURI'S REQUEST
FOR A CHANGE IN DATES AND A COMMISSION ORDER**

COMES NOW the Staff of the Missouri Public Service Commission ("Staff"), by and through undersigned counsel of the Staff Counsel's Office, and files Staff's response to Union Electric Company's, d/b/a Ameren Missouri ("Ameren Missouri") filing on May 5, 2014, requesting that the Staff be given until December 19, 2014, rather than August 29, 2014, to file a recommendation whether rule 4 CSR 240-3.105 should be amended, and that the Commission order the Staff to consult with interested stakeholders to develop a workshop process and schedule that will allow the Staff to meet the proposed December 19, 2014, date by using dates other than May 23, 2014, and June 4, 2014, previously requested by the Staff, and addressed by the Commission in its April 23, 2014, Notice Of Opportunity To Comment. In response thereto, the Staff states as follows:

1. The Staff filed a Motion on April 17, 2014, for a Commission Order Directing Responses on May 23, 2014, and Scheduling a Workshop on June 4, 2014, with the idea that these dates would not be the only dates prior to August 29, 2014, for participation by interested persons or entities, i.e., the Staff planned that later dates for additional workshops would be discussed at the June 4, 2014, workshop. Ameren Missouri clearly indicates in its filing that the May 23, 2014, and June 4, 2014, dates are problematic for it, as evidently are any dates prior to the Ameren Missouri announced on or before July 15, 2014, end date for the filing of its impending rate increase case.

As a consequence, Ameren Missouri requests relief from the August 29, 2014, date set by the Commission and the May 23, 2014, and June 4, 2014, dates requested by the Staff and addressed by the Commissioned in its April 23, 2014, Notice Of Opportunity To Comment.

2. The Staff appreciates the desire to keep the matter of the review of 4 CSR 240-3.105 moving on a timely basis. The Staff is also mindful of the resources and the ability to participate of interested persons and entities. The Staff is not adverse to Ameren Missouri's request to move the August 29, 2014, date to December 19, 2014, if this will permit Ameren Missouri to meaningfully participate. At the same time, the Staff encourages any interested person or entity to file in File No. EW-2014-0239, as soon as it has proposed language, the legal authority in support of that language, and/or a workshop schedule which will allow the Staff and participants to get to the December 19, 2014, date.

WHEREFORE the Staff does not object to Ameren Missouri's May 5, 2014, request that the Commission give the Staff until December 19, 2014, instead of August 29, 2014, to file a recommendation whether an amendment of rule 4 CSR 240-3.105 should be considered by the Commission, and to develop a workshop process and schedule utilizing dates other than the dates May 23, 2014, and June 4, 2014, requested by the Staff and addressed by the Commissioned in its April 23, 2014, Notice Of Opportunity To Comment.

Respectfully submitted,

/s/ Steven Dottheim

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff Motion For Commission Order Directing Responses And Scheduling A Workshop* have been transmitted electronically to all Commission-certificated electric utilities in the State of Missouri, and to all parties in the most recent triennial 4 CSR 240-Chapter 22 filing for each electric utility this 9th day of May, 2014. For Union Electric Company, d/b/a Ameren Missouri that is File No. EO-2011-0271, for The Empire District Electric Company that is File No. EO-2013-0547, for Kansas City Power & Light Company that is File No. EO-2012-0323, and for KCP&L Greater Missouri Operations Company that is File No. EO-2012-0324.

/s/ Steven Dottheim