## 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 Approval of 2017 Green Tariff

File No. ET-2018-0063 Tracking No. YE-2018-0064

## JOINT MOTION TO SET ASIDE DATE FOR STAFF RECOMMENDATION AND COMMENTS OF INTERESTED PARTIES

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**COME NOW** Staff of the Missouri Public Service Commission and Union Electric Company d/b/a Ameren Missouri (Ameren Missouri or Company) (collectively, "Movants"), and hereby request that the Commission set aside the requirements for Staff to file a recommendation and for interested parties to file comments by March 26, 2018. In further support of its joint motion, Movants state as follows:

1. On February 26, 2018, the Commission granted Movant's Joint Motion for Extension of Time to File Recommendations noting in its order that additional time was needed by the parties to conduct additional discovery and negotiations regarding a possible settlement. In addition Ameren Missouri extended the effective date of its tariff to April 25, 2018 to allow for further discovery and settlement discussions.

2. Most recently, on March 23, 2018, the parties participated in extensive settlement discussions and agreed that a settlement agreement would likely be filed no later than April 13, 2018. Movants are authorized to represent that it is the belief of the parties that the March 26<sup>th</sup> requirement of filing a Staff recommendation and parties' comments is not timely or helpful toward the resolution of this matter because the parties are working toward concluding and filing a settlement agreement intended to resolve all or most of the issues of this case.

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3. Public Counsel has authorized Movants to represent that it does not oppose this motion. Counsel for the parties have been contacted and all have indicated that they do not oppose this motion.

WHEREFORE, for the above-stated reasons, Movants pray the Commission set aside the March 26, 2018 requirements of Staff to file a recommendation and for interested parties to file comments to allow the parties to conclude and file a settlement agreement no later than April 13, 2018.

Respectfully submitted,

#### /s/ Robert S. Berlin

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Attorney for Staff of the Missouri Public Service Commission

#### <u>/s/ James B. Lowery</u>

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# Attorneys for Union Electric Company D/B/A Ameren Missouri

### **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served electronically on this 26<sup>th</sup> day of March, 2018 to the parties of record as set out on the official Service List maintained by the Data Center of the Missouri Public Service Commission for this case.

## /s/ Robert S. Berlin