BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electric Company d/b/a)
Ameren Missouri's 3 rd Filing to Implement) <u>Case No. EO-2018-0211</u>
Regulatory Changes in Furtherance of Energy)
Efficiency as Allowed by MEEIA.)

JOINT MOTION OF STAFF AND AMEREN MISSOURI TO SUSPEND THE CURRENT PROCEDURAL SCHEDULE AND ADOPT A PROPOSED MODIFIED PROCEDURAL SCHEDULE

COME NOW the Staff of the Missouri Public Service Commission and Ameren Missouri ("Joint Movants"), by and through counsel, and for their Joint Motion to Suspend the Current Procedural Schedule and Adopt a Proposed Modified Procedural Schedule, state as follows:

- On July 23, 2018, Staff filed its Motion to Suspend Procedural Schedule ("Motion") in order to address certain discovery concerns raised by Staff in its examination of Ameren Missouri's MEEIA Cycle 3 Application. The Commission issued an order the next day, July 24th, setting August 2, 2018 as the deadline for parties to file a response to Staff's Motion.
- 2. In an effort to resolve Staff's Motion, Ameren Missouri has proposed a modified procedural schedule rather than a suspension of the current procedural schedule. In return for Staff's agreement to join in proposing the following revised procedural schedule one that allows more time for both Company and Staff to work toward resolving their issues, Ameren Missouri has committed to work closely with Staff representatives to see whether the Staff's discovery concerns can be resolved.
- 3. Staff agrees to work with Ameren Missouri to see if a resolution of its discovery concerns can be achieved. Accordingly, Staff is willing to withdraw its July

23rd Motion to Suspend Procedural Schedule in return for the suspension of the current procedural schedule and the adoption of the following revised proposed procedural schedule. Staff reserves its right to renew its Motion should it determine, after working with the Company to resolve Staff's discovery issues, that further suspension is required.

	Current Due Date	Proposed Due Date
Rebuttal	8/14	8/30
Surrebuttal/Cross	8/30	9/17
Last Day of Discovery	9/7 ¹	9/27
List of Issues, etc.	9/11	10/1
Statement of Position	9/14	10/4
Pre-marked Exhibit List	9/28	10/11
Hearing	10/2 – 10/5	10/15 — 10/19
Initial Briefs	10/26	11/14
Reply Briefs	11/2	11/30
Requested Order	11/30	12/28

4. Because rebuttal testimony is currently due on August 14th, Joint Movants request that the Commission set July 30th by close of business as the deadline for any party responses to this Joint Motion and respectfully request the Commission expedite the approval of the above proposed revised procedural schedule by issuing an order by delegation by August 1, 2018².

1

¹ By issuing Data Requests or other written discovery requests, subpoenas, or the last date by which a deposition may be taken.

²Joint Movants understand there is no scheduled Agenda meeting on August 1st.

WHEREFORE, for the reasons stated above, Joint Movants pray the Commission 1) suspend the current procedural schedule, 2) adopt the above proposed revised procedural schedule, 3) set July 30th by close of business as due date for any responses, and 4) expedite approval of this Joint Motion by issuing an order by delegation by August 1, 2018, and order any other relief just in the circumstances.

Respectfully submitted,

/s/ Robert S. Berlin

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CERTIFICATE OF SERVICE

	I do hereby	certify th	at a t	true	and	cori	rect c	opy of	the	for	egoing	docu	ıment l	าลร
been	electronically	mailed	this 2	26 th	day	of	July,	2018	to	all	counsel	of	record	in
this p	roceeding.													

/s/ Robert S. Berlin