

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

In the Matter of the Application of Ameren)
Transmission Company of Illinois for a Certificate)
of Public Convenience and Necessity Authorizing it)
to Construct, Install, Own, Operate, Maintain and) File No. EA-2017-0345
Otherwise Control and Manage a 345-kV)
Electric Transmission Line from Palmyra, Missouri,)
to the Iowa Border and an Associated Substation)
Near Kirksville, Missouri.)

**MOTION FOR ADOPTION OF PROCEDURAL SCHEDULE
AND MOTION FOR EXPEDITED TREATMENT**

COMES NOW Ameren Transmission Company of Illinois (ATXI) (Company or ATXI), and, pursuant to 4 CSR 240-2.080(16), submits this Motion for Adoption of Procedural Schedule and Motion for Expedited Treatment, and in support thereof, states as follows:

1. On this date, ATXI filed its verified Application and Motion for Expedited Treatment (the “Application”) in the above-captioned case, and advised the Commission of the bases for its Motion for Expedited Treatment as required by 4 CSR 240-2.080(16).

3. In its Application, ATXI requested that the Commission set a prehearing conference as soon as possible, that an early intervention deadline be established, and that the Commission enter an order approving the Application by January 18, 2018, for the reasons outlined therein.

4. As also provided for in ATXI’s Application, the Company has filed this Application as soon as reasonably possible under the circumstances; specifically, just 10 days after obtaining the final two county assents under Section 229.100, RSMo. The Company has also previously met with Staff regarding the Application, will provide its workpapers as soon as practicable (expect to provide by September 18 or 19), and is providing its direct testimony

concurrently with its filing. Finally, this proposed schedule was prepared and filed concurrently with the filing of the Company's Application.

5. ATXI also hereby indicates its willingness to serve objections to any Data Requests within five (5) business days of service thereof, and to respond to any Data Requests within ten (10) business days of service thereof, as set forth in the Proposed Procedural Requirements outlined below.

6. For the foregoing reasons, ATXI respectfully submits that its proposed Procedural Schedule and Procedural Requirements, as set forth below, are fair, reasonable, and appropriate under the circumstances of this case and hereby respectfully requests that they be adopted.

Proposed Procedural Schedule

Deadline for Intervention:	October 6, 2017
Prehearing Conference:	September 26, 2017
Local Public Hearings	October 10, 16-17, 2017 ¹
Rebuttal Testimony Due:	October 25, 2017
Surrebuttal and Cross-Surrebuttal Testimony Due:	November 10, 2017
Last Day to Request Discovery:	November 15, 2017
List of Issues, List of Witnesses, and Order of Cross-Examination Due:	November 16, 2017
Position Statements Due:	November 21, 2017
Evidentiary Hearing:	November 28-30, 2017
Initial Post-Hearing Briefs Due:	December 12, 2017

¹ These dates are available according to the Commission's public calendar. The Company recommends that the Commission hold three local public hearings, which is the same number of local public hearings held in File No. EA-2015-0146. Given the proposed route, the Company recommends the local public hearings be set as follows: in Kirksville (to cover Adair and Schuyler Counties – Schuyler County seat and Kirksville only an approximately 30-mile drive apart); in Knox City (to cover Knox and Lewis Counties – the proposed route only catches a very small part of Lewis County in the Southwest corner of the county, which is less than a 30-minute drive from the Project area in Lewis County); and in Hannibal (to cover Marion County).

Reply Briefs Due:

December 22, 2017

Requested Commission Order:

On/before January 18, 2018

7. Counsel for Staff and OPC have reviewed the above Proposed Procedural Schedule and have indicated that they do not oppose the Company's suggested dates. Neither Staff nor OPC have made any representations with respect to the Proposed Procedural Requirements contained below.

Proposed Procedural Requirements

- (a) All parties must comply with the requirements of Commission Rule 4 CSR 240-2.130 for prepared testimony, including the requirement that testimony be filed on line-numbered pages.
- (b) Although not all parties may agree upon how each issue should be described or on whether a listed issue is in fact a proper issue in this case, the parties shall agree upon and file a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which they will be called, and the order of cross-examination for each witness. The list of issues should be detailed enough to inform the Commission of each issue that must be resolved. The Commission will view any issue not contained in this list of issues as uncontested and not requiring resolution by the Commission.
- (c) Each party shall file a simple and concise statement summarizing its position on each disputed issue.
- (d) All pleadings, briefs, and amendments shall be filed in accordance with Commission Rule 4 CSR 240-2.080. Briefs shall follow the same list of issues as filed in the case and must set forth and cite the proper portions of the record concerning the remaining unresolved issues that are to be decided by the Commission.
- (e) If part of testimony or documents are prefiled and served upon the parties before a hearing, a party need only provide a copy of the testimony or document to the court reporter for marking as an exhibit. If not prefiled and served upon the parties, then a party who has a document marked for use at the hearing shall have sufficient copies of the document to provide a copy not only to the court reporter, but also to each of the Commissioners, the presiding officer, and counsel for each other party.
- (f) All parties shall provide copies of testimony (including schedules), exhibits, and pleadings to other counsel by electronic means and in electronic form, essentially concurrently with the filing of such testimony, exhibits, or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put

information that does not exist in electronic format into electronic format for purposes of exchanging.

- (g) Public documents filed in the Commission's Electronic Filing and Information System ("EFIS") shall be considered properly served by serving the same on counsel of record for all other parties via e-mail. The parties agree highly confidential documents may be obtained from EFIS and so agree not to serve those documents via email.
- (h) Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains highly confidential or proprietary information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of ATXI data request responses, ATXI shall post its data request responses on its Caseworks Extranet site; however, in the case of responses to data requests Staff issues, ATXI shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.
- (i) The parties shall make an effort to not include confidential information in data requests. If confidential information must be included in a data request, the confidential information shall be appropriately designated as such pursuant to Commission Rule 4 CSR 240-2.135.
- (j) The response time for all data requests shall be ten (10) business days, with five (5) business days to object or notify the requesting party that more than ten (10) business days will be needed to provide the requested information. If a data request has been responded to, a party's request for a copy of the response shall be timely responded to, considering that the underlying data request has already been responded to (except that, with the exception of responses to Staff, responses will not be needed for ATXI data request responses posted on ATXI's Caseworks Extranet site).
- (k) Workpapers prepared in the course of developing a testimony shall not be filed with the Commission, but shall be submitted to each party within two (2) business days following the filing of the testimony document, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing confidential information shall be appropriately marked. If there are no workpapers associated with testimony, the party's attorney shall so notify the other parties within the time allowed for providing those workpapers.

- (l) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. With the exception of workpapers provided to Staff, ATXI may provide workpapers by posting the same on its Caseworks Extranet site, with e-mail notification to counsel for the parties to be provided essentially concurrently with the posting of workpapers on the Extranet site. ATXI shall provide its workpapers to Staff in electronic format by e-mailing or by delivery of a compact disc or other electronic storage.
- (m) Commission Rule 4 CSR 2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion shall be waived.

7. ATXI seeks expedited treatment of this Motion, in accordance with 4 CSR 240-2.080(16). In this regard, ATXI hereby incorporates herein by reference the bases for seeking expedited treatment as set forth in ¶¶ 22 through 26 of its Application.

WHEREFORE, Applicant ATXI respectfully prays that the Commission (a) immediately issue its order giving notice of this case; (b) immediately issue its order shortening the time for response to this Motion, and specifically, requiring that any such response or any alternative procedural schedule desired by any other party be filed with the Commission no later than September 25, 2017 (the day before the proposed Prehearing Conference); (c) issue its order shortening the time for intervention, as contemplated by 4 CSR 240-2.075(1), and requiring that all applications for intervention be filed on or before October 6, 2017 (d) issue its order setting a Prehearing Conference on September 26, 2017, and (f) issue its order adopting the procedural schedule and procedural requirements proposed herein.

Dated: September 15, 2017

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the following this 15th day of September, 2017:

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