

**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 Convenience and Necessity)
under Section 393.170, RSMo relating to) File No. EA-2022-0099
Transmission Investments in Southeast)
Missouri.)

JOINTLY PROPOSED PROCEDURAL SCHEDULE

COMES NOW Ameren Transmission Company of Illinois (ATXI), on behalf of itself, the Staff of the Missouri Public Service Commission (Staff), and the Missouri Joint Municipal Electric Utility Commission (MJMEUC) (collectively, the Parties), and for the Parties’ Jointly Proposed Procedural Schedule states as follows:

1. ATXI filed its Application for a Certificate of Convenience and Necessity and Motion for Expedited Treatment in the above-captioned case on December 21, 2021.
2. MJMEUC filed an application to intervene, which was granted by the Commission on January 14, 2022. Staff is also a party to this case.
3. On March 4, 2022, the Commission ordered the parties to, no later than March 16, 2022, file a jointly proposed procedural schedule that includes a new deadline for Staff’s recommendation.
4. The Parties join in and have authorized ATXI to file this pleading and recommend that the Commission adopt the following jointly proposed procedural schedule:

Proposed Procedural Schedule

Staff Rebuttal Testimony Due:	April 8, 2022
Surrebuttal Testimony Due:	April 29, 2022

List of Issues Due:	May 3, 2022
Position Statements Due:	May 6, 2022
Evidentiary Hearing:	May 11-12, 2022
Initial Post-Hearing Briefs Due:	May 25, 2022
Reply Briefs Due:	June 3, 2022

5. In addition to the above proposed schedule, the Parties also request the Commission adopt the following procedural requirements:

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 online-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 pre-filed 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 pre-filed 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 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 confidential 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 related testimony, 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, or designee, 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-mail 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.

WHEREFORE, the Parties hereby request that the Commission issue its order adopting the procedural schedule and procedural requirements proposed herein.

Respectfully submitted,

AMEREN TRANSMISSION COMPANY OF
ILLINOIS

By: /s/ Geoffrey F. Grammer

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served via electronic mail (e-mail) to all parties of record on this 16th day of March 2022.

/s/ Geoffrey F. Grammer
