

**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 Permission and Approval and ) **File No. EA-2023-0286**  
Certificates of Public Convenience and )  
Necessity Authorizing it to Construct )  
Renewable Generation Facilities )

**STAFF’S OBJECTION TO AMEREN MISSOURI’S  
REQUEST FOR PROCEDURAL SCHEDULE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and objects to Ameren Missouri’s<sup>1</sup> Motion for Procedural Schedule.

On June 16, 2023,<sup>2</sup> Ameren Missouri filed its Application for Certificates of Convenience and Necessity for Solar Facilities. On June 16, it also filed a Motion for Adoption of Procedural Schedule and Motion for Expedited Treatment. On June 21, the Commission entered its Order Directing Notice, Setting Intervention Deadline, Directing Staff Recommendation and Setting a Prehearing Conference. The Commission set the following deadlines and hearing dates:

<b>EVENT</b>	<b>DATE</b>
Intervention Deadline	July 12
Response to Motion for Protective Order	July 12
Prehearing Conference	July 13
Staff Recommendation	August 18
Other Parties’ Responses to Application	August 18

Rule 20 CSR 4140-2.080 (13) states that parties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by

<sup>1</sup> Union Electric Company, d/b/a Ameren Missouri

<sup>2</sup> Unless otherwise indicated, all date references will be to 2023.

the Commission. The deadline for responding to Ameren Missouri's Motion for Adoption of Procedural Schedule and Motion for Expedited Treatment is June 26, which is only ten days after the Application was filed; 16 days before the intervention deadline; 17 days before the Prehearing Conference; 53 days before Staff's recommendation deadline; and 53 days before other parties' response deadline to the Application. .

Based upon a preliminary review of the application Staff is tasked with review of four separate projects with varying timelines, three separate contract structures (each with hundreds of pages), assets in two states, two that interconnect at the distribution system level and two that will interconnect at the transmission level. This case is going to be complicated, in part, due to Ameren's filing of four individual assets in one filing.

Other than the Commission Staff, no party has entered an appearance in this case. With no input from any person whose positions and schedule may be involved other than Staff, Ameren Missouri proposes a procedural schedule that sets filing deadlines on September 22, October 3, October 20, October 31, and November 7, with a three day hearing commencing on November 13. Requiring Staff to respond to Ameren Missouri's actual proposed procedural order no later than June 26—16 days before anyone else need respond—is presumptuous and speculative: It presumes on Staff's positions, procedures and schedules in reviewing a complex case rendered more complex by Ameren Missouri's filing cases on four individual assets in one filing; and it presumes on the positions and speculates on the schedules of persons who need not and might not enter appearances in the case before July 12. The Commission should deny the request for a procedural schedule.

**WHEREFORE**, for the foregoing reasons, Staff requests the Commission's Order denying Ameren Missouri's request for a procedural schedule.

**Respectfully Submitted,**

/s/ Paul T. Graham #30416

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**ATTORNEY FOR COMMISSION STAFF**

**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all persons who have entered an appearance of record in this matter on this June 26, 2023, by electronic filing in EFIS.

/s/ Paul T. Graham