# 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 Certificates of Convenience and Necessity for Solar Facilities.

File No. EA-2023-0286

# STAFF'S REPLY TO AMEREN MISSOURI'S THIRD MOTION TO AMEND PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission and,

in response to Ameren Missouri's Third Motion to Amend Procedural Schedule, tenders

the following schedule:<sup>1</sup>

## Schedule

Item	Due
Surrebuttal and Cross-Surrebuttal Testimony	December 15, 2023
Motions for Leave to File Sur-Surrebuttal Testimony Due	December 22, 2023
Responses to Motions for Leave to File Sur-Surrebuttal Testimony Due	January 2, 2024
List of Issues, List of Witnesses, and Order of Cross-Examination Due	January 26, 2024
Position Statements Due	February 2, 2024
Last Day to Request Discovery <sup>2</sup>	February 2, 2024
Evidentiary Hearings	February 13 - 15, 2024
Expedited Transcripts Filed	February 22, 2024
Initial Post-Hearing Briefs Due	March 7, 2024
Reply Briefs Due	March 14, 2024

<sup>&</sup>lt;sup>1</sup> Staff agrees that the other procedural requirements reflected in the order adopting the original procedural schedule will remain in effect.

<sup>&</sup>lt;sup>2</sup> No deposition may occur after this date, and no DR may be issued such that the response date falls after this date.

#### <u>Caveat</u>

Staff proposes these deadlines without prejudice to Staff's rights, under the Commission's previous order and the Commission's rules and regulations, to object and seek remediation in response to any effort by the Company to introduce new direct case evidence calculated to address its current failures to present, in its direct case, evidence sufficient to make a prima facie CCN case.

WHEREFORE, the Staff respectfully requests that the Commission make and enter its order amending the procedural schedule to reflect the above-stated procedural milestones and dates.

#### **Respectfully Submitted,**

<u>Isl Paul 7. Graha</u>m #30416

Senior Staff Counsel Missouri Public Service Commission P.O. Box 360 Jefferson City, Mo 65102-0360 (573) 522-8459 Paul.graham@psc.mo.gov

Attorney for the Staff of the Missouri Public Service Commission

## **CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all counsel of record on this December 11, 2023, by electronic filing in EFIS, electronic mail, hand-delivery, or U.S. postage prepaid.

Isl Paul 7. Graham