

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

In the Matter of Union Electric Company)
d/b/a Ameren Missouri's 4th Filing to)
Implement Regulatory Changes in)
Furtherance of Energy Efficiency as)
Allowed by MEEIA)

Case No. EO-2023-0136

MOTION TO SCHEDULE PROCEDURAL CONFERENCE

COMES NOW the Office of the Public Counsel (the "OPC") and in response to the Public Service Commission of the State of Missouri's (the "Commission") June 17, 2024 Order Directing Filing (the "June 17 Order"), respectfully requests the Commission schedule a procedural conference to discuss adding two more days to the currently scheduled hearing in this matter. In support, the OPC states as follows:

1. On February 29, 2024, the Commission entered its Order Setting Procedural Schedule ("Procedural Schedule"), setting the hearing for this matter for July 24-26, 2024. (Doc. 48).
2. Since that time Direct, Rebuttal, and Surrebuttal testimony discussing Union Electric Company d/b/a Ameren Missouri's ("Ameren Missouri") Amended Application has been filed.¹ This testimony comes from 23 individual witnesses and consists of over 1,015 pages.²
3. The current Procedural Schedule gives the parties only three (3) days to not only present their opening statements, but also to cross-examine each of the witnesses. (*See* Procedural Schedule 2).

¹ Ameren Missouri filed its Amended Application and supporting Direct Testimony on January 25, 2024. (Docs. 32-36).

² This number does not include: (1) cover pages, (2) Tables of Contents, (3) affidavits, or, notably, (4) any attachments or exhibits.

4. On June 14, 2024, Ameren Missouri, Staff of the Commission (“Staff”), the OPC, Natural Resources Defense Council (“NRDC”), Midwest Energy Consumers Group (“MECG”), and Consumers Council of Missouri (“Consumers Council” and collectively with the other listed parties the “Joint Motion Parties”) filed a Joint Motion to Amend Procedural Schedule (the “Joint Motion”) requesting, in part, that “[g]iven the number of witnesses and the difficulty of scheduling a time for hearing, as a precaution, the [Joint Motion] Parties respectfully request the Commission add two more hearing days.” (Jt. Mot. 1, Doc. 104). The Joint Motion Parties requested that the Commission amend the procedural schedule so that the hearing take place on July 22-26, 2024. (*Id.* 2).
5. In its June 17 Order, the Commission granted, in part, the Joint Motion, but noted that it addressed only the request to extend two deadlines. (June 17 Order 1, Doc. 105). The Commission did not specify when it would consider the request to add more hearing days. (*See id.*).
6. The OPC appreciates the Commission’s swift action in extending the discovery deadline, as well as, the deadline to file the list of issues, order of witnesses, order of cross-examination, and order of opening statements.
7. However, the OPC remains concerned that three (3) days is simply not enough time to complete the hearing for this matter.³ Again, given the number of witnesses, the vast amount of testimony filed in this matter, and the difficulty of scheduling a time

³ The OPC notes that the Commission currently has four (4) days, with an overflow fifth (5th) day, scheduled to consider Evergy Metro, Inc. d/b/a Evergy Missouri Metro’s and Evergy Missouri West, Inc. d/b/a Evergy Missouri West’s MEEIA Cycle 4 Applications. (Doc. 12, Case No. EO-2023-0369; Doc. 10, Case No. EO-2023-0370).

for hearing, the OPC requests that the Commission schedule a procedural conference as soon as possible to discuss the request to add two more hearing days.

WHEREFORE, the Office of the Public Counsel respectfully requests that the Commission schedule as soon as possible a procedural conference to discuss the request to add two more hearing days.

Respectfully submitted,

/s/ Lindsay VanGerpen
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 21st day of June 2024.

/s/ Lindsay VanGerpen