## 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 Certificate of Public Convenience and	)	File No. EA-2024-0237
Necessity Authorizing it to Construct a Simply Cycle	)	
Natural Gas Generation Facility.	)	

# MOTION FOR EXPEDITED TREATMENT OF MOTION FOR PROTECTIVE ORDER

COMES NOW Union Electric Company, d/b/a Ameren Missouri ("Company" or "Ameren Missouri"), and requests that the Commission grant expedited treatment of its Motion for Protective Order, filed this same date, by acting on its request for an order as soon as possible, preferably by July 12, 2024. In support of its request, Ameren Missouri states as follows:

- 1. Following the intervention of several parties to this action, Ameren Missouri filed today its Motion for Protective Order, pursuant to 20 CSR 4240-2.135(4).
- 2. Because confidential information in the Company's original filing would qualify for the "Highly Confidential" designation if the Commission grants the Motion for Protective Order, the Company requests expedited treatment of its Motion for Protective Order to authorize that designation.
- 3. Granting the Motion for Protective Order will prevent the harms to the Company and its customers described in the Company's original motion by making clear that any request for proposal ("RFP") responses, contract specifications, pricing, terms, and conditions of contracts related to the Project, many of which are the subject of Non-Disclosure Agreements required by the contractors, should not be shared with any employees of a party, or if it has been shared, that such employees should promptly return all such information to the party's attorney of record. Such an order will not harm the public or the Company's customers.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant expedited treatment of its Motion for Protective Order requested by the Company by issuing an order by July 12, 2024, if possible, and direct use of the Non-Disclosure Agreement forms marked as Exhibits A and B thereto.

Respectfully submitted,

#### /s/ James B. Lowery

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#### /s/ Wendy K. Tatro

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ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

### **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing was served on all counsel of record via electronic mail (e-mail) on this 8<sup>th</sup> day of July 2024.

/s/ James Lowery
James Lowery