

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

In the Matter Union Electric Company )  
d/b/a Ameren Missouri's Tariffs to Adjust ) **File No. GR-2024-0369**  
Its Revenues for Natural Gas Service ) Tracking No. JG-2025-0045

**JOINT PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** the Staff of the Missouri Public Service Commission ("Staff"), Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), Office of the Public Counsel ("OPC"), and Missouri School Board Association ("MSBA"), by and through undersigned counsel, propose the following procedural schedule:

- 1. The undersigned parties recommend that the Commission adopt the following Procedural Schedule:<sup>1</sup>

<b>EVENT</b>	<b>DATE</b>
Discovery Conference	December 19, 2024
End of True-Up Period	December 31, 2024
Discovery Conference	January 9, 2025
Technical Conference on Transportation Tariff	January 15, 2025
Discovery Conference	February 6, 2025
Direct testimony – Revenue Requirement (COS) (All parties except Ameren Missouri) (Response time for data requests changes to 10 calendar days and 5 calendar days to object or notify of the need for additional time to respond)	February 28, 2025
Discovery Conference	March 13, 2025
Direct testimony – Class Cost of Service and Rate Design (all parties except Ameren Missouri)	March 14, 2025
Rebuttal Testimony (Response time to data requests changes to 5 business days and 3 business days to object or notify of the need for additional time to respond)	April 4, 2025
Local Public Hearings	April 2025
Technical Conference on Transportation Tariff	April 9, 2025
Discovery Conference	April 10, 2025
True-Up Information Provided to Parties	April 11, 2025

<sup>1</sup> The Company's request to allow for a discrete adjustment has been presented to the Commission under separate cover for Commission decision and the parties did not include any dates to address the request.

Surrebuttal, Cross-Surrebuttal, and True-Up Direct Testimony (including final true-up accounting schedules that support a specific true-up revenue requirement for both Company and Staff)	May 2, 2025
Discovery Conference	May 7, 2025
Preliminary Issues List, Order of Witnesses, Opening Statements, and Cross Examination, and Reconciliation Circulated among Parties (Not Filed)	May 9, 2025
Settlement Conference	May 13-14, 2025
List of Issues, List of Exhibits, Order of Witnesses, Opening Statements, and Cross Examination - Filed	May 20, 2025
Last Day to Request Discovery Except for Rate Case Expense	May 30, 2025
Last Day to Take Deposition or File Discovery Motions	May 30, 2025
Statements of Position	May 30, 2025
Parties to Submit Final Valuation of Positions to Staff for Final Reconciliation	May 30, 2025
Reconciliation	June 4, 2025
Evidentiary Hearing	June 9-20, 2025
Initial Post-Hearing Briefs	July 21, 2025
Reply Briefs and True-Up Briefs	August 11, 2025
Agenda (at least 10 days before end of Suspension Period)	August 20, 2025
End of Suspension Period/Effect of Law Date	September 1, 2025

2. The undersigned parties recommend the Commission direct the parties to work with the Commission to identify dates for local public hearings in April 2025.

3. The undersigned parties recommend that the Commission adopt the following order regarding Technical and Settlement Conferences:

A. Parties interested in participating in the Technical Conferences regarding the proposed Transportation Tariff shall meet and confer in good faith prior to those Technical Conferences to develop an agenda. At all Technical Conferences regarding the proposed Transportation Tariff, the parties shall appear in person or remotely with a knowledgeable subject matter expert capable of discussing items identified in the agenda.

B. For all Settlement Conferences, all parties shall appear in person or remotely by attorney and by a representative with settlement authority on behalf of the party.

4. The undersigned parties recommend that the Commission adopt the following Discovery Conditions:

A. The Parties shall provide all workpapers, in electronic format, within two (2) business days following the date on which the related testimony is filed. Workpapers containing confidential information shall be appropriately marked pursuant to Commission Rule 20 CSR 4240-2.135. If there are no workpapers associated with testimony, the party's attorney shall so notify the other parties within the time allowed for providing those workpapers.

B. Where workpapers or data request responses include models, spreadsheets, or similar information originally in a commonly-available format where inputs or parameters may be changed to observe changes in inputs or outputs, 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. Ameren Missouri shall provide its workpapers to Parties in electronic format by e-mailing or by delivery of a compact disc or other electronic storage or file sharing agreed to by Staff counsel or any other party.

C. Discovery Requests shall be governed by Commission Rules except as follows:

1. Beginning the date of Direct Testimony on Revenue Requirement by non-utility parties, proposed above as February 28, 2025, the

response time for data requests shall be ten (10) calendar days to provide the requested information and five (5) business days to object or to notify the requesting party that more than ten (10) calendar days will be required to provide the requested information.

2. Beginning the date of Rebuttal Testimony, proposed above as April 4, 2025, the response time for all data requests shall be five (5) business days to provide the requested information and three (3) business days to object or to notify the requesting party that more than five (5) calendar days will be required to provide the requested information.

3. Discovery Conferences will be held in Room 305 at the Commission's office at the Governor's Office Building, 200 Madison Street, Jefferson City Missouri, with remote connectivity via Webex. Each Discovery Conference will begin at 10:00 a.m.

4. At least three (3) business days before each discovery conference, any party that has a discovery disagreement or concern shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal discovery motion. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement must attend. If the parties do not identify any discovery disagreements or concerns as described herein, the presiding officer may cancel the conference.

5. If a moving party has already conferred or attempted to confer with opposing counsel concerning a discovery matter, that party may file any discovery motions to be entertained at the discovery conference at least three (3) business days in advance. Any party seeking a hearing on any discovery motion outside of a regularly

scheduled discovery conference shall comply with 20 CSR 4240-2.090(8) prior to filing the discovery motion.

6. Discovery Conferences shall be on the record and transcribed by a court reporter.

7. Any pending written discovery motion may be taken up at a discovery conference and may be ruled upon by the presiding regulatory law judge either on the record, or in a written order.

8. Commission Rule 20 CSR 4240-2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion is waived.

5. The undersigned parties recommend that the Commission adopt the following additional procedural rules:

A. All parties must comply with the requirements of Commission Rule 20 CSR 4240-2.130 for prepared testimony, including the requirement that testimony be filed on line-numbered pages. 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.

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 parties recognize that the Commission may view any issue not contained in this list of issues to be uncontested and not requiring resolution by the Commission. Each party shall file a simple and concise statement summarizing its position on each disputed issue, including citations to pre-filed testimony supporting its position.

C. For the Statements of Position to be filed May 23, 2025, each party shall file a simple and concise statement summarizing its position on each disputed issue, including citations to pre-filed testimony supporting its position.

D. Public documents filed in 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.

E. Any data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System (EFIS) pursuant to 20 CSR 4240-2.090(2)(H). All data requests other than those issued to or by Staff, as well as all objections to data requests, or notifications of the need for additional time to respond, shall be sent by e-mail to counsel for the other parties. Counsel for each party shall

receive electronically, via either EFIS notification or e-mail from the 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 data requests issued via EFIS, 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, thereby providing the responding party the opportunity to object. 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. If any party responds to a data request in EFIS, the response is available in EFIS to all counsel on the certified service list. Data request responses, other than responses to data requests in EFIS, 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 responses to data requests Staff issues, Ameren Missouri 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.

F. All pleadings, briefs, and amendments shall be filed in accordance with Commission Rule 20 CSR 4240-2.080. 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.

G. 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 20 CSR 4240-2.135.

H. The parties hereby request expedited transcripts of the proceedings.

**WHEREFORE**, the undersigned parties respectfully request the Commission order the procedural schedule identified above.

Respectfully submitted,

**/s/ J. Scott Stacey**

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**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record this 24<sup>th</sup> day of October, 2024.

**/s/ J. Scott Stacey**