

**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 a Certificate                    )  
of Convenience and Necessity to Construct, Own,                ) File No. EA-2025-0028  
Operate and Maintain a Transmission Substation in                )  
Cooper County, Missouri.    )

**RESPONSE TO ORDER DIRECTING FILING AND STATUS REPORT**

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Missouri Public Service Commission Staff ("Staff"), Renew Missouri, and the Office of Public Counsel, and for their Response to Order Directing Filing and Status Report, state as follows:

1. On October 18, 2024, Ameren Missouri filed an application in this matter for a certificate of convenience and necessity ("CCN") to build a new 161kV transmission substation to be located near Woolridge, Missouri.
2. On November 19, 2024, the Missouri Public Service Commission (the "Commission") entered an order directing the parties in this case to file a proposed procedural schedule or alternative pleading not later than November 26, 2024. The November 19th order also approved the applications to intervene from Renew Missouri and four residents who live near the proposed transmission substation (the "Neighboring Residents").
3. At present, discovery is ongoing. Staff has recently received answers from Ameren Missouri to several data requests and expects to receive an answer to one still outstanding data request due on Dec. 2nd. Staff also expects to submit follow-up data requests.
4. Staff needs additional time to assess the discovery responses and evaluate its position regarding Ameren Missouri's request for a CCN.

5. Ameren Missouri has recently reached out to the Neighboring Residents and expects to engage in discussion to address their concerns with the proposed transmission substation.

6. Ameren Missouri needs additional time to explore whether Ameren Missouri can alleviate the Neighboring Residents' concerns.

7. At this time, the parties are uncertain whether a hearing in this matter will be necessary. Allowing an additional thirty days for the parties to assess their positions will enable the parties to determine whether or not a hearing is needed.

WHEREFORE, the undersigned parties respectfully request to be relieved of the order to submit a procedural schedule by November 26, 2024, and request until December 27, 2024 to submit either a follow-up status report or in the alternative, request a procedural conference or submit a proposed procedural schedule.

Respectfully submitted,

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**ATTORNEY FOR THE OFFICE OF  
PUBLIC COUNSEL**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the parties listed on the official service list via electronic mail (e-mail) on this 26th day of November, 2024.

*/s/ William D. Holthaus, Jr.*  
William D. Holthaus, Jr.