BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Adjust Its Revenues for Electric Service

Case No. ER-2024-0319

SIERRA CLUB'S MOTION FOR LEAVE TO FILE UNREDACTED TESTIMONY

COMES NOW Sierra Club, and for its Motion to File Unredacted Testimony, states as follows:

1. On December 3, 2024, Sierra Club timely filed the Direct Testimony of Tyler

Comings (Confidential and Public) in the above-captioned matter.

2. In this testimony, Sierra Club relied upon and referenced two exhibits that

Ameren produced and marked CONFIDENTIAL. In accordance with rule 20 CSR 4240-

2.135(10), Sierra Club redacted the portions of the public version of its testimony that referenced these exhibits.

3. Prior to the December 3 filing, Sierra Club inquired with Ameren about the basis for these confidentiality designations. Sierra Club subsequently learned from Ameren on December 12 that the information Sierra Club used from these exhibits is not CONFIDENTIAL, though certain other aspects of the exhibits may still be CONFIDENTIAL.

4. For the sake of transparency to the public, Sierra Club seeks to file its testimony as entirely public, removing the redactions referencing and relying upon these exhibits, yet retaining its originally filed exhibits intact. A true and correct copy of this testimony is attached hereto as Exhibit A.

5. Because Sierra Club merely unredacted the previously redacted information and made no substantive changes to its testimony, no party should be prejudiced by this action.

6. Sierra Club has consulted with Ameren, and the Company does not oppose this

motion.

WHEREFORE, Sierra Club requests that the Commission accept the public testimony of

Tyler Comings, which removes unnecessarily redacted material.

Respectfully Submitted,

/s/ Sarah Rubenstein Sarah Rubenstein (MO Bar #48874) Great Rivers Environmental Law Center 319 N. Fourth Street, Suite 800 St. Louis, Missouri 63102 (314) 231-4181 srubenstein@greatriverslaw.org

Counsel for Sierra Club

<u>CERTIFICATE OF SERVICE</u>

I hereby certify that on this 16th day of December, 2024, a true and correct copy of the

foregoing pleading was filed on EFIS and sent by email to all parties of record.

/s/ Sarah Rubenstein

Sarah Rubenstein