

**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 ("OPC"), 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. On November 26, 2024, Ameren Missouri, Staff, OPC, and Renew Missouri filed a joint status report and requested additional time by which to file a proposed procedural schedule or other alternative pleading.

4. Later that same day, the Commission issued an order granting this request and setting a deadline for Dec. 27, 2024 by which to file a proposed procedural schedule or alternative pleading.

5. At present, discovery continues. Staff has recently received another data request response from Ameren Missouri and Staff recently submitted an additional data request to Ameren Missouri, with a response currently due on January 7, 2025.

6. Staff needs additional time to assess the discovery responses and evaluate its position regarding Ameren Missouri's request for a CCN.

7. Ameren Missouri continues to negotiate with the Neighboring Residents and address their concerns with the proposed transmission substation. Among other things, Ameren Missouri is working to prepare a landscaping plan for discussion with the Neighboring Residents.

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

9. At this time, the parties are uncertain whether a hearing in this matter will be necessary. Allowing an additional month 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 December 27, 2024, and request until January 27, 2025 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 27th day of December, 2024.

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