

**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.)

JOINTLY PROPOSED PROCEDURAL SCHEDULE

COME NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"), the Missouri Public Service Commission Staff ("Staff"), and Renew Missouri¹, and hereby submit the following Jointly Proposed Procedural Schedule and related Procedural Requirements, as contemplated by the Commission's January 27, 2025 *Order Directing Filing*.

Proposed Procedural Schedule

Amended CCN Application and Motion for Leave to Amend CCN Application

Feb. 12, 2025

Rebuttal Testimony or, in the alternative, (for Staff only), Staff Report / Recommendation²

February 24, 2025

Surrebuttal and Cross-Surrebuttal Testimony³ Due April 25, 2025

List of Issues, List of Witnesses, and Order of Cross-Examination Due May 2, 2025

¹ Ameren Missouri notified the four neighboring residents who have intervened in this matter (collectively, the "Neighboring Residents") of this Proposed Procedural Schedule on Thursday, January 30, 2025 by email to the listed service email address for the Neighboring Residents. Ameren Missouri asked if the Neighboring Residents would be willing to join in this proposal and support this Proposed Procedural Schedule. To date, counsel for Ameren Missouri has not received any reply from the Neighboring Residents. Ameren Missouri has also consulted with counsel for OPC. OPC has stated it would support this Proposed Procedural Schedule if the Neighboring Residents will support it.

² The Staff Report / Recommendation provided by Staff would be in the form of a report that presents in narrative form the conclusions of Staff witnesses and the facts and information on which they relied.

³ Responsive, in the case of Staff, to either Staff's rebuttal testimony or recommendation.

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| Last Day to Request Discovery or Take Deposition | May 6, 2025 |
| Position Statements Due | May 12, 2025 |
| Evidentiary Hearing | May 21-23, 2025 |
| Transcripts Available (expedited) | May 29, 2025 |
| Initial Post-Hearing Briefs Due | June 11, 2025 |
| Reply Briefs Due | June 20, 2025 |
| Requested Commission Order | July 15, 2025 |

Proposed Procedural Requirements

- (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 using line-numbered pages.
- (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 Commission will view any issue not contained in this list of issues as uncontested and not requiring resolution by the Commission.
- (c) Each party shall file a simple and concise statement summarizing its position on each disputed issue.
- (d) 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.
- (e) If part of testimony or documents are prefiled and served upon the parties before a hearing, a party need only provide a copy of the testimony or document to the court reporter for marking as an exhibit. If not prefiled and served upon the parties, then a party who has a document marked for use at the hearing shall have sufficient copies of the document to provide a copy not only to the court reporter, but also to each of the Commissioners, the presiding officer, and counsel for each other party.
- (f) 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 already exist in electronic format into electronic format for purposes of exchanging.

- (g) Public documents filed in the Commission’s Electronic Filing and Information System (“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 e-mail.
- (h) Counsel for each party shall receive electronically from all other parties serving a data request, an electronic copy of the text of the “description” of that data request contemporaneously with service of the data request. Data requests issued to or by Staff shall be submitted and responded to in EFIS, if feasible, or in electronic format on compact disc, or by other means agreed to by counsel, if infeasible. Also regarding Staff-issued data requests, if the description contains highly confidential or proprietary 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. Data requests, objections to data requests, and notifications respecting the need for additional time to respond to data requests shall be sent by e-mail to counsel for the other parties. 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. Data request responses 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 Ameren Missouri data request responses, Ameren Missouri shall post its data request responses on its Caseworks Extranet site; however, 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.
- (i) 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.
- (j) Workpapers prepared in the course of developing testimony shall not be filed with the Commission, but shall be submitted to each party within two (2) business days following the filing of the testimony document, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing confidential information shall be appropriately marked. 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.
- (k) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, 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. With the exception of workpapers provided to Staff, Ameren Missouri may provide workpapers by posting the same on its Ameren Missouri Legal Regulatory File Sharing site, with an e-mail notification to counsel for the parties to be provided essentially concurrently with the posting of workpapers on the external site with instructions on how to access. Ameren Missouri shall provide its workpapers to Staff in electronic format by e-mailing or by delivery of a compact disc or other electronic storage.

WHEREFORE, the undersigned parties respectfully request that the Commission issue its order adopting the Jointly Proposed Procedural Schedule and Procedural Requirements proposed herein.

Respectfully submitted,

/s/ William D. Holthaus, Jr.

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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 3rd day of February, 2025.

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