BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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, Operate and Maintain a Transmission Substation in Cooper County, Missouri.

File No. EA-2025-0028

MOTION FOR LEAVE TO FILE AMENDED APPLICATION

COMES NOW Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri", "Company"), pursuant to 20 CSR 4240-2.080(18), and hereby seeks leave to file the Amended Application attached hereto as Exhibit A. In support of its Motion for Leave, Ameren Missouri states as follows:

1. Ameren Missouri initiated this case with the filing of the original Application on October 18, 2024. Ameren Missouri has since responded to numerous data requests from Staff and has had multiple discussions with Staff as Staff reviews and evaluates the Application.

2. In the course of this process, Ameren Missouri determined that its original Application erroneously indicated that a 67 MVAR capacitor bank would occupy a terminal position at the new Cooper Substation. This capacitor bank was actually placed in service at the existing 161 kV/69 kV Overton Substation in March, 2024. The capacitor bank will not be moved and will remain at the above-referenced Overton Substation. Staff requested that Ameren Missouri amend its original Application to correct these facts, which Ameren Missouri does with the proffer of its Amended Application. Due to the passage of time and the maturation of the project plans and cost estimates, Ameren Missouri's Amended Application also contains a couple of other updates relating to the project plans and estimated cost, none of which fundamentally change the basic project scope or drivers of the project.

3. As also requested by the Staff, Ameren Missouri has supplemented Appendix 1 included with the Amended Application by including a topography map, additional overhead illustrations of the transmission lines, and a list of drawings and specifications for the transmission lines.

4. Appendices 2 and 3 of the original CCN Application remain unchanged.

5. 20 CSR 4240-2.080(18) provides that any pleading may be amended at any time with leave of the Commission. Good cause exists to grant Ameren Missouri's request for leave to amend the original Application based on Staff's request that it do so, and so that the Commission may act on the latest, accurate information respecting the proposed Cooper Substation project. Given the minor changes to the original Application, no party will be prejudiced by the amendments.

WHEREFORE, Ameren Missouri respectfully requests that the Commission grant it leave to file its Amended Application.

Respectfully submitted,

/s/ William D. Holthaus, Jr. William D. Holthaus Jr., #63888 Senior Corporate Counsel Ameren Missouri Wendy K. Tatro, #60261 Director and Assistant General Counsel P.O. Box 66149 St. Louis, MO 63166-6149 (314) 554-3484 (phone) (314) 554-4014 (fax) AmerenMOService@ameren.com

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ATTORNEYS FOR UNION ELECTRIC COMPANY d/b/a AMEREN MISSOURI

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 12th day of February, 2025.

> <u>/s/ William D. Holthaus, Jr.</u> William D. Holthaus, Jr.