

**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, Operate and Maintain a)
Transmission Substation in Cooper County,)
Missouri)

File No. EA-2025-0028

**STAFF REQUEST FOR EXTENSION OF TIME TO FILE
STAFF REPORT / RECOMMENDATION**

COMES NOW Staff of the Missouri Public Service Commission, and for its Request for Extension of Time to File Staff Report / Recommendation (“Report”) respectfully states as follows:

1. On February 3, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), Renew Missouri, and Staff filed a Joint Proposed Procedural Schedule in this matter, which included, among other things, the following scheduling proposals:

- | | |
|---|-------------------|
| Amended CCN ¹ Application and Motion for Leave to Amend CCN Application by Ameren Missouri | Feb. 12, 2025 |
| Rebuttal Testimony or, in the alternative, (for Staff only), Staff Report / Recommendation | February 24, 2025 |
| Surrebuttal and Cross-Surrebuttal Testimony | April 25, 2025 |

2. On February 7, 2025, the Commission issued its *Order Setting Procedural Schedule* (“Order”) in which it adopted the Joint Proposed Procedural Schedule, a portion of which is set forth above.

¹ Certificate of Convenience and Necessity

3. Pursuant to the procedural schedule as set forth above, Ameren Missouri filed its Amended CCN Application and Motion for Leave to Amend CCN Application on February 12, 2025 (the “Amended CCN Application”). Ameren Missouri had originally filed a CCN Application in this matter on October 18, 2024 (the “Original CCN Application”).

4. The Original CCN Application estimated the cost of the new facilities which are the subject of this case to be approximately \$28 million (Original CCN Application paragraph 15). The Amended CCN Application estimated the cost of the new facilities which are the subject of this case to be approximately \$50 million (Amended CCN Application paragraph 15) – nearly double the estimated cost contained in the Original CCN Application.

5. Despite having submitted data requests to Ameren Missouri in this proceeding, and having been in contact with Ameren Missouri through the proceeding, Staff was not made aware of the near doubling of the estimated cost until Ameren Missouri filed its Amended CCN Application and Motion for Leave to Amend CCN Application on February 12.

6. After receiving Ameren Missouri’s February 12 filings, Staff submitted a data request (DR 22) to Ameren Missouri in an attempt to gain an understanding of the significant estimated cost increase between the Original CCN Application and the Amended CCN Application. Ameren Missouri’s response to that data request is due March 6, 2025.

7. Until Staff receives a full explanation of the significant estimated cost increase between the Original CCN Application and the Amended CCN Application,

Staff is unable to conduct and provide a full and complete analysis of the currently pending application to the Commission. Accordingly, Staff is unable to file its Staff Report / Recommendation on February 24 as currently ordered in the procedural schedule.

8. Due to the foregoing, as well as the currently very heavy caseload of Staff, Staff requests that the due date for its Rebuttal Testimony, or in the alternative its Staff Report / Recommendation, be extended until March 20, 2025. Such an extension should not harm or prejudice any other party, since Surrebuttal and Cross-Surrebuttal Testimony are not due under the procedural schedule until April 25, 2025. Furthermore, Staff has been informed by counsel for Ameren Missouri that Ameren Missouri consents to the requested extension.

WHEREFORE, Staff respectfully requests the Commission issue an order extending the date for Rebuttal Testimony or, in the alternative (for Staff only), a Staff Report / Recommendation, until March 20, 2025, and for such further orders as to the Commission seem just and reasonable.

Respectfully submitted,

/s/ Jeffrey A. Keevil

Jeffrey A. Keevil

Missouri Bar No. 33825

P. O. Box 360

Jefferson City, MO 65102

(573) 526-4887 (Telephone)

(573) 751-9285 (Fax)

Email: jeff.keevil@psc.mo.gov

Attorney for the Staff of the
Missouri Public Service Commission

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 21st day of February 2025.

/s/ Jeffrey A. Keevil