

**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.)	

**AMEREN MISSOURI’S REPOSENSE TO STAFF RECOMMENDATION, REQUEST TO
ELIMINATE PROCEDURAL SCHEDULE, AND
REQUEST FOR PROMPT ISSUANCE OF REPORT AND ORDER**

COMES NOW Union Electric Company d/b/a Ameren Missouri (“Company” or “Ameren Missouri”), and for its above-referenced Response and Requests (the “Response”), states as follows:

1. This case pertains to construction of a new substation and related transmission lines to replace an aged facility with a history of reliability issues relative to other 161 kV substations on Ameren Missouri’s system.

2. On March 20, 2025, the Commission’s Staff filed its recommendation (“Staff Recommendation”), in which the Staff recommended approval of the Company’s request for a certificate of convenience and necessity (“CCN”) which would allow construction of the substation and lines, with certain conditions.

3. By this Response, the Company indicates that it is agreeable to all the conditions proposed by the Staff, save one slight modification to one condition, as follows (being Construction and Clearing Condition No. 2 on page 15 of the Staff’s Recommendation):

Prior to construction, Ameren Missouri’s ~~Construction Supervisor~~
Landowner Representative will personally contact each landowner to discuss access to the right-of-way on their parcel and any special concerns or requests about which the landowner desires to make Ameren Missouri aware.

4. The modification is necessitated by a change in the Company's processes and roles on projects of this type since a condition like this was agreed upon by the Company and ordered by the Commission in File No. EO-2002-351, which was the case upon which the Staff based its recommended conditions. The undersigned counsel for the Company has been authorized by Staff Counsel to indicate that Staff does not object to this modification to Construction and Clearing Condition No. 2.

5. On April 18, 2025, four of the five intervenors in this docket, being landowners with property adjacent to Ameren Missouri-owned land on which the substation is to be built, each filed their Dismissal of Intervention with Prejudice, indicating that they do not oppose issuance of the CCN and do not request a hearing in this matter. The undersigned counsel for the Company has contacted counsel for the other parties to this case, the Office of the Public Counsel ("OPC") and Renew Missouri, to inquire as to whether they are agreeable to issuance of the CCN in this case (with the recommended Staff conditions, including the above-referenced modification) and do not request a hearing in this case. Counsel for Renew Missouri has authorized the undersigned counsel to indicate that Renew Missouri does not oppose issuance of the CCN and does not request a hearing. Counsel for OPC has indicated that it will advise of its position on this filing on Monday, April 21, 2025. Given the time-sensitive nature of this matter, as discussed further below, the Company is making this filing pending further communication from OPC in order to advise the Commission of the relief the Company is requesting in this filing as soon as possible.

6. Given that it appears likely that there are no disputed matters before the Commission, the Company respectfully submits that there is no need to maintain the current Procedural Schedule and that it should therefore be eliminated. The undersigned counsel for

the Company has been authorized by counsel for the Staff and Renew Missouri to indicate that they do not oppose elimination of the Procedural Schedule.

7. In order to begin construction of the substation at issue and maintain its planned construction schedule, the existing Overton-Sedalia East 161 kV transmission line must be taken out of service for approximately 19 days to allow certain initial construction (that must be done when the existing substation is offline) to take place in advance of full substation construction. To minimize the risk of system disruptions, the existing transmission line outage should occur this spring, prior to the beginning of peak demand season on the system, which can start to occur on or around June 1 each year due primarily to increased air conditioning loads. The Company has scheduled the required outage and this initial construction to begin no later than May 12, 2025.

8. Consequently, the Company respectfully requests, if reasonably possible, that the Commission issue its Report and Order approving the CCN, with the Staff recommended conditions (as modified as outlined herein) no later than May 2, 2025, and make it effective no later than May 9, 2025.

WHEREFORE, the Company agrees to the Staff-recommended conditions, with one modification set forth herein, requests that the Procedural Schedule be eliminated, and requests that the CCN be issued and made effective no later than by May 9, 2025, with the agreed upon conditions.

Respectfully Submitted,

/s/ *James B. Lowery*

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**ATTORNEYS FOR UNION
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AMEREN MISSOURI**

CERTIFICATE OF SERVICE

The undersigned certifies that true and correct copies of the foregoing was served on the parties of record to this case via electronic mail (e-mail) on this 18th day of April, 2025.

/s/ James B. Lowery