

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union	)	
Electric Company d/b/aa Ameren Missouri	)	
For Permission and Approval and	)	
Certificates of Public Convenience and	)	<b><u>File No. EA-2025-0238</u></b>
Necessity Authorizing it to Construct a New	)	
Generation Facility and Battery Energy	)	
Storage System	)	

**PROPOSED PROCEDURAL SCHEDULE**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”),  
by and through counsel, and, on the basis of such replies as Staff has received from  
other parties of record, tenders the following Joint Proposed Procedural Schedule:

<b>Item</b>	<b>Date</b>
Virtual Local Public Hearing	October 21, 2025
Discovery Conference	October 22, 2025
In-Person Local Public Hearing	October 23, 2025
Rebuttal Testimony	December 9, 2025
Discovery Conference	December 18, 2025
Settlement Conference	December 19, 2025
Surrebuttal/Cross-Surrebuttal	January 16, 2026
List of Issues and Witnesses, Order of Openings, Witnesses and Cross Examination	January 21, 2026
Last Day to Request Discovery	January 21, 2026
List of Exhibits	January 21, 2026
Position Statements	January 27, 2026

Evidentiary Hearing

February 2-6, 2026

Initial Briefs

February 27, 2026

Reply Briefs

March 13, 2026

Staff has endeavored to communicate with all parties of record. The foregoing is based upon the responses Staff has received. The parties suggest that the procedural order include the following procedural provisions:

- (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) Copies of prefiled testimony and documents served upon the parties before a hearing need not be provided to the court reporter for marking as exhibits where the record clearly identifies the prefiled testimony and documents that are made hearing exhibits. 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.
- (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<sup>1</sup> and the website webftp.ameren.com; 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 or highly 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. If highly confidential information must be included in a data request, the highly confidential information shall be appropriately designated as such.
- (j) From and after September 15, 2025, the response time for all data requests shall be twelve (12) calendar days, with three (3) business days to object or notify the requesting party that more than twelve (12) calendar days will be needed to provide the requested information. From and after surrebuttal testimony is filed (January 16, 2026) the response time for all data requests shall be five (5) calendar days, with two (2) business days to object or notify the requesting party that more than five (5) calendar days will be needed to provide the requested information. If a data request has been responded to, a party’s request for a copy of the response shall be timely responded to without waiting the full response time allowed (except that, with the exception of responses to Staff, responses will not be needed for Ameren Missouri data request responses posted on Ameren

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<sup>1</sup> Pending technology solutions being explored for OPC, Ameren Missouri will make data request responses available to OPC electronically by alternative means.

Missouri's Caseworks Extranet site since Ameren Missouri will allow parties who have requested copies of Ameren Missouri's responses to other parties' data requests to access them through its Caseworks Extranet site).

- (k) Discovery conferences will be held either virtually via phone and/or computer or at the Commission's office at the Governor Office Building, 200 Madison Street, Jefferson City, Missouri, in a room to be designated by the Commission. Each discovery conference will begin at 10:00 a.m.
- (l) Not less than three business days before each discovery conference, any party that has a discovery disagreement or concern involving another party shall file a brief statement describing that disagreement or concern and identifying any other parties involved. Such statement does not need to be a formal motion to compel. Any party may attend a discovery conference, but only those parties involved in an identified discovery disagreement must attend. If the parties do not identify any discovery disagreements or concerns as described herein, the presiding officer may cancel the conference.
- (m) Discovery conferences shall be on the record and will be transcribed by a court reporter if requested by the parties.
- (n) Any pending written discovery motion may be taken up at a discovery conference and may be ruled upon by the presiding regulatory law judge either on the record, or in a written order.
- (o) Commission Rule 20 CSR 4240-2.090's requirement that a party must seek a telephone conference with the presiding officer before filing a discovery motion is waived.
- (p) Workpapers prepared in the course of developing a 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.
- (q) 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. Ameren Missouri may provide workpapers by posting the same on its Ameren Missouri Legal Regulatory File Sharing site<sup>2</sup>, 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.
- (r) The Settlement conference provided for in the Procedural Schedule is designed to facilitate information sharing and encourage settlement, but does not impose on any party the obligation to participate.

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<sup>2</sup> Pending technology solutions being explored for OPC, Ameren Missouri will make workpapers available to OPC electronically by alternative means.

**WHEREFORE**, Staff respectfully prays that the Commission issue its order adopting the Jointly Proposed Procedural Schedule and Procedural Requirements proposed herein.

**Respectfully Submitted,**

/s/ *Paul T. Graham* #30416

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**CERTIFICATE OF SERVICE**

The undersigned by his signature below certifies that the foregoing pleading was served upon all persons who have entered an appearance of record in this matter on this July 30, 2025, by electronic filing in EFIS.

/s/ *Paul T. Graham*