

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

In the Matter of the Application of Ameren)
Transmission Company of Illinois for a)
Certificate of Convenience and Necessity to)
Construct, Install, Own, Operate, Maintain,)
and Otherwise Control and Manage a 138 kV)
Transmission Line and associated facilities)
in Perry County, Missouri)

Case No. EA-2025-0222

MOTION FOR EXTENSION OF TIME

Comes now, the Office of the Public Counsel (the “OPC”) and respectfully requests that the Commission extend the time for the OPC to file its reply to Ameren Transmission Company of Illinois’ (“ATXI”) Response to the Office of the Public Counsel’s Proposed Conditions (the “ATXI Response,” Doc. 21) until December 12, 2025. In support, the OPC states as follows:

1. On May 1, 2025, ATXI filed an Application and supporting Direct Testimony requesting a Certificate of Convenience and Necessity (“CCN”) to “construct, install, own, operate, maintain, and otherwise control and manage a new, approximately four-mile, 138-kV transmission line and associated facilities in Perry County, Missouri.” (Appl. 1, Doc. 2).
2. On September 15, 2025, Staff filed its Recommendation, in which it suggested that the Commission grant ATXI’s requested CCN subject to certain identified conditions. (Doc. 13).
3. Ten days later, on September 25, 2025, Staff and ATXI filed a Joint Recommendation for Granting of Certificate of Convenience and Necessity, identifying agreed-to modifications to some of Staff’s recommended conditions. (Doc. 14).

4. On October 24, 2025, in accordance with an extension granted by the Commission, the OPC filed its Response to Staff Recommendation. (“the OPC Response,” Doc. 18). In its Response, the OPC requested that the Commission impose two additional conditions, or alternatively issue a procedural schedule. (*Id.* 6-7).
5. On November 3, 2025, ATXI responded to the OPC Response, generally opposing the OPC’s proposed conditions. (“the ATXI Response,” Doc. 21).
6. Though the Commission did not identify a deadline by which parties must respond to the ATXI Response, 20 CSR 4240-2.080(13) states “[p]arties shall be allowed ten (10) days from the date of filing in which to respond to any pleading unless otherwise ordered by the commission.”
7. The ten-day deadline identified in 20 CSR 4240-2.080(13) to respond to the ATXI Response expires on November 13, 2025.
8. Commission Rule 20 CSR 4240-2.050(3)(A) allows the Commission to extend the deadline to respond to the ATXI Response. 20 CSR 4240-2.050(3)(A) (“When an act is required or allowed to be done by order or rule of the commission at or within a specified time, the commission may— (A) Order the period enlarged before the expiration of the period originally prescribed or as extended by a previous order”).
9. The OPC and ATXI have been discussing possible resolution of this matter. The OPC requests additional time to determine whether a settlement can be reached that would resolve the OPC’s concerns as identified in the OPC Response.
10. The OPC requests that the Commission extend the deadline for the OPC to file its reply to the ATXI Response until December 12, 2025.

WHEREFORE, the OPC respectfully requests that the Commission extend the time for it to file its reply to ATXI's Response until December 12, 2025.

Respectfully submitted,

/s/ Lindsay VanGerpen
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 13th day of November 2025.

/s/ Lindsay VanGerpen