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 Public 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

File No. EA-2025-0222

AMEREN TRANSMISSION COMPANY OF ILLINOIS' RESPONSE TO THE OFFICE OF PUBLIC COUNSEL'S SECOND MOTION FOR EXTENSION OF TIME

COMES NOW Ameren Transmission Company of Illinois ("ATXI") and hereby provides its response to the Second Motion for Extension of Time, filed by the Office of Public Counsel (the "OPC"):

1. The Office of Public Counsel has filed its second motion in this case seeking to extend the time in which it may respond regarding the Joint Recommendation for Granting of Certificate of Convenience and Necessity ("CCN"), filed by ATXI and the Staff of the Public Service Commission on September 25, 2025.1

¹ Commission rules are silent as to the OPC's right to reply to ATXI's response or, for that matter, to ATXI's right to file a sur-reply to the OPC's reply. However, it is ATXI's understanding that Commission practice allows for such filings.

- 2. After receiving its first extension of time to respond to the Joint Recommendation, the OPC filed its request that the Commission impose two additional conditions to the granting of the CCN on October 24, 2025. ATXI timely filed its Response to the OPC's Recommended Conditions within ten days. Now, the OPC seeks twenty-nine days in addition to the ten days already allowed by rule to reply to ATXI's Response.
- 3. To avoid unduly delaying the resolution of this matter, ATXI opposes the OPC's request for an extension which would allow it a total of thirty-nine days in which to reply to ATXI's opposition to conditions that the OPC has requested.
- 4. However, ATXI does not oppose an extension of time up to and including **November 26, 2025**, for the OPC to file a reply.

WHEREFORE, ATXI requests that the Commission enter its Order granting the OPC an extension of time of up to and including **November 26**, **2025**, in which to file its reply to ATXI's opposition to the conditions proposed by the OPC.

Respectfully submitted,

/s/ Jason Kumar

Jason Kumar, MBN 64969 Assistant Corporate Counsel Ameren Services Company

1901 Chouteau Avenue P.O. Box 66149, MC 1310 St. Louis, MO 63166-6149 (314) 243-8944 (phone) (314) 554-4014 (fax) JKumar@ameren.com

Eric Dearmont, MBN 60892 Director and Assistant General Counsel Ameren Services Company 1901 Chouteau Avenue P.O. Box 66149, MC 1310 St. Louis, MO 63166-6149 (314) 749-9275 (phone)

/s/ Michael R. Tripp

Michael R. Tripp, MBN 41535 JBL Law, LLC 9020 S. Barry Road Columbia, MO 65201 (573) 476-0050 tripp@jbllawllc.com

Attorneys for Ameren Transmission Company of Illinois

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 18th day of November 2025.

<u>/s/ Michael R. Tripp</u>
Attorney for Ameren Transmission
Company of Illinois