

**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   | ) | File No. EA-2024-0302 |
| under Section 393.170.1, RSMo, Relating    | ) |                       |
| to Transmission Investments in Northwest   | ) |                       |
| and Northeast Missouri                     | ) |                       |

**AMEREN TRANSMISSION COMPANY OF ILLINOIS’  
OBJECTIONS TO ADDITIONAL LATE-FILED EXHIBITS**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and for its Objections to Additional Late Filed Exhibits filed by Mr. Mark Harding, states as follows:

1. On October 27, 2025, the Commission ordered late-filed exhibits be filed no later than October 31, 2025, and objections to those exhibits be filed no later than November 5, 2025.

2. On November 18, 2025, Mr. Harding filed 10 additional exhibits, and on November 19, 2025, Mr. Harding filed another additional exhibit, not previously offered at the hearing or filed by the deadline for late-filed exhibits.

3. On November 19, 2025, the Commission issued an *Order Directing Filing*, providing that it will allow responses to these exhibit filings and that any party who wishes to object to Mr. Harding’s exhibits shall do so no later than November 20, 2025.

4. ATXI objects to the admission of the additional exhibits submitted by Mr. Harding on November 18, 2025, and November 19, 2025. These exhibits were not used to cross-examine a witness at the evidentiary hearing or introduced and/or moved for admission at the evidentiary hearing or within the deadline for late-filed exhibits established by the Commission. The evidentiary phase of this proceeding has ended, and it would be prejudicial to ATXI to admit new exhibits during the briefing phase of this proceeding. The submission of these exhibits constitutes an attempt to supplement Mr. Harding’s prefiled testimony contrary to 20 CSR 4240-2.130 (10),

which provides as follows: “No party shall be permitted to supplement prefiled prepared direct, rebuttal, or surrebuttal testimony unless ordered by the presiding officer or the commission.” To the extent that some of the exhibits are portions of exhibits admitted into evidence by other parties (e.g., the document submitted as EFIS Item 299 on November 19m 2025, appears to be part of a Staff Exhibit), reintroducing such exhibits is also duplicative, confusing, and unnecessary.

5. Certain of the additional exhibits submitted by Mr. Harding are data requests which, as indicated in those documents, ATXI objected to on the grounds, among others, that they sought information which exceeded the scope of the grant of intervention to Mr. James Harding which was limited per the *Order Regarding Applications To Intervene and Directing Filing Of Procedural Schedule* issued May 7, 2025, to “the issue of routing concerns affecting [his] property.” ATXI objects to those exhibits on this additional basis.

WHEREFORE, ATXI respectfully requests that the Commission disallow and strike the additional exhibits filed by Mr. Harding on EFIS on November 18, 2025, and November 19, 2025, for the reasons stated above.

Dated: November 20, 2025

Respectfully submitted,

AMEREN TRANSMISSION COMPANY OF ILLINOIS

By: /s/ Carmen L. Fosco  
One of its attorneys

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***Attorneys for Ameren Transmission  
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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record and parties appearing *pro se* as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on November 20, 2025.

/s/. Carmen L. Fosco

Carmen L. Fosco