

**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	)	

**STAFF’S MOTION FOR REBUTTAL DEADLINE EXTENSION AND  
FOR LEAVE TO FILE REBUTTAL TESTIMONY  
IN A REPORT FORMAT**

**COMES NOW** the Staff of the Missouri Public Service Commission (“Staff”), by and through counsel, and requests the Commission’s Order extending the deadline for filing Staff Rebuttal Testimony to December 12, 2025, and for leave to file its Rebuttal Testimony in a report format, stating further:

1. On September 4, 2025,<sup>1</sup> the Commission issued its Order Setting Procedural Schedule, a Local Public Hearing, and Assignment of Exhibit Numbers (“Order”).

2. The Order set a December 9 deadline for Rebuttal Testimony. It further ordered:

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.

3. Rule 20 CSR 4240-2.130 (8) states:

Except as set out in this section, the prepared testimony of each witness shall be filed separately and shall be accompanied by an affidavit providing the witness’s oath. In lieu of prepared direct testimony, any party may file a report that presents in narrative form, and with complete and

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<sup>1</sup> All date references will be to 2025 unless otherwise stated.

comprehensive detail, the analysis and conclusions of one (1) or more expert witness(es) and the facts and information on which they relied. In any report, the contributing expert witnesses shall be listed together with an indication of the portion or portions of the report to which each contributed. The qualifications of each contributing expert witness shall be attached to the report as a schedule. Any such report shall comply with the commission's requirements in sections (6) and (7).

4. While the above cited rule explicitly allows for a party to submit its direct testimony in report form, Staff, in this proceeding, proposes to file rebuttal testimony in a report format in order to assist the Commission. It is Staff's view that in this case a report format will more clearly and coherently chart and lead the Commission through the pathways of Staff's investigation, conclusions and recommendations than will a relatively more "piecemeal" testimony format. Staff states that its report in this case will comply with the requirements for a report listed in 20 CSR 4240-2.130(8).

5. Hopefully without appearing to presume upon the Commission's order, Staff has prepared a report as described. But because of the press of the work in this case and others, Staff needs more time to format and put the testimony into final form. Staff is confident that this can be done and the report can be filed no later than December 12.

6. Staff has inquired of the other parties as to whether there are objections to Staff's requests, and Staff has received none.

7. Staff, of course, has no objection to the Commission's extending the filing deadline for all parties, and advises the Commission that two parties have so requested.

**WHEREFORE**, Staff respectfully prays that the Commission issue its order extending the deadline for Staff's rebuttal testimony to December 12 and for its leave to file the

rebuttal testimony in a report format; and for such other orders as the Commission may deem appropriate.

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 December 9, 2025, by electronic filing in EFIS.

/s/ Paul T. Graham