

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
for Permission and Approval and)
Certificates of Convenience and Necessity)
Authorizing it to Construct a New)
Generation Facility and Battery Energy)
Storage System)

Case No. EA-2025-0238

**MOTION FOR EXTENSION OF TIME AND MOTION FOR EXPEDITED
TREATMENT**

Comes now, the Office of the Public Counsel (the “OPC”) and respectfully requests that the Public Service Commission of the State of Missouri (the “Commission”) extend the time for all parties to file Rebuttal Testimony until December 12, 2025. The OPC also requests expedited treatment on this motion. In support, the OPC states as follows:

1. On June 26, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren”) 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 an electric generating facility to be constructed in Jefferson County, Missouri (‘Big Hollow CTG Project’ or ‘CTG Project’).” (Appl. 1, Doc. 2). In the Application, Ameren also requests a CCN to “construct, install, own, operate, maintain, and otherwise control and manage a 400-megawatt (‘MW’) battery energy storage system facility to be constructed in Jefferson County, Missouri (‘Big Hollow BESS Project’ or ‘BESS Project’) (together with the CTG Project, ‘the Projects’).” (*Id.*) Ameren also requested other relief, including that the Commission issue its order no later than March 2026.

2. On July 30, 2025, Staff of the Commission (“Staff”) filed a Proposed Procedural Schedule “on the basis of such replies as Staff has received from other parties of record.” (Proposed Procedural Schedule 1, Doc. 21). On September 4, 2025, the Commission issued its Order Setting Procedural Schedule, a Local Public Hearing, and Assignment of Exhibit Numbers (the “Procedural Schedule”), identifying, in pertinent part, December 9, 2025, as the deadline to file Rebuttal Testimony. (Procedural Schedule 2, Doc. 26).¹
3. On December 9, 2025, Staff filed a Motion for Rebuttal Deadline Extension and for Leave to File Rebuttal Testimony in a Report Format. (the “Motion for Extension,” Doc. 36). In its Motion for Extension, Staff requests, in pertinent part, that the Commission extend the deadline for Staff to file its Rebuttal Testimony. (*Id.* 2-3). Staff stated that it “has inquired of the other parties as to whether there are objections to Staff’s requests, and Staff has received none.” (*Id.* 2). It further stated that it “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.” (*Id.*).
4. Commission Rule 20 CSR 4240-2.050(3)(A) allows the Commission to extend the deadline to file Rebuttal Testimony. 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”).

¹ The Commission later modified the Procedural Schedule by changing the start time for the Local Public Hearing. (Order Modifying Procedural Schedule 2, Doc. 30).

5. The OPC requests for all parties the same extension as that requested by Staff in its Motion for Extension, to file rebuttal testimony by December 12, 2025.
6. In support of this request, the OPC notes that its non-objection to Staff's Motion for Extension was contingent on its understanding that Staff would seek an extension for all parties to file rebuttal testimony. The OPC objects to the Commission extending the deadline to file rebuttal testimony for Staff only because this would give Staff an unfair advantage as it would have an opportunity to review other parties' Rebuttal Testimony before it must file its own.

MOTION FOR EXPEDITED TREATMENT

1. The OPC requests that the Commission act on this motion as soon as possible, but no later than December 9, 2025, the current deadline to file Rebuttal Testimony in this matter.
2. If the Commission acts by December 9, 2025, then all parties will know the deadline to file Rebuttal Testimony. However, if the Commission fails to act by this date an ambiguity will exist as to the filing deadline for each party. Parties may run the risk of the Commission striking their testimony as late filed by not filing today (the current deadline for Rebuttal Testimony) or giving other parties an unfair advantage by filing before the deadline for all other parties to file Rebuttal Testimony.
3. The OPC is not aware of any negative effect on Ameren's customers or the general public if the Commission acts on this request by December 9, 2025.
4. As Staff filed its Motion for Extension today, this motion was filed as soon as it could have been.

WHEREFORE, the OPC respectfully requests that the Commission extend the time for *all* parties to file Rebuttal Testimony to December 12, 2025, and that the Commission act on this motion no later than today, December 9, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 9th day of December 2025.

/s/ Lindsay VanGerpen