

**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 Public Convenience and )  
Necessity Authorizing it to Construct )  
Renewable Generation Facility and Battery )  
Energy Storage Systems )

Case No. EA-2026-0183

**JOINT MOTION TO SET LOCAL PUBLIC HEARINGS, DIRECT NOTICE, AND  
MOTION FOR EXPEDITED TREATMENT**

COME NOW the Office of the Public Counsel (the “OPC”), Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”), the Staff of the Public Service Commission of the State of Missouri (“Staff” and “Commission,” respectively), and Renew Missouri Advocates d/b/a Renew Missouri (“Renew,” and together with the OPC, Ameren Missouri, and Staff, the “Parties”) and request that the Commission set four local public hearings for this matter—one virtual and a separate in-person hearing in Eolia, Vandalia, and Advance, Missouri—and direct notice of the local public hearings. The Signatories also request expedited treatment of this Motion, with the Commission making a decision no later than July 14, 2026, to allow Ameren Missouri to timely provide notice for the requested local public hearings. In support, the Parties state as follows:

1. On May 22, 2026, Ameren Missouri filed an Application and supporting Direct Testimony requesting, in pertinent part, the Commission issue a Certificate of Convenience and Necessity (“CCN”) for Ameren Missouri to “construct, install, own, operate, maintain, and otherwise control and manage” three new battery energy storage systems (“BESS”), two new solar generation facilities, and a new switching station. (Appl. 1-3, Doc. 2). Ameren Missouri requested that the

Commission issue an order on its Application no later than November 30, 2026. (*Id.* at 3).

2. On June 29, 2026, the Parties filed a Proposed Joint Procedural Schedule. (Doc. 22). In that filing, the Parties identified the date for the Local Public Hearings (“LPHs”) as “To Be Determined” and mentioned in a footnote that they “continue to discuss proper customer notice of the LPHs, which could affect the potential dates for them.” (*Id.* 1, 1 n.2). The footnote also indicated that “Staff suggests that LPHs occur on July 28-30.” (*Id.* 1 n.2). Staff further requested that the Commission “set a procedural conference as soon as convenient and require the parties to be ready to provide the Commission at that time with all their LPH customer notice suggestions.” (*Id.*).
3. On July 8, 2026, the Commission issued its Order Setting Procedural Schedule (Doc. 24) and an Order Setting Prehearing Conference, setting a prehearing conference to discuss the local public hearings on July 13, 2026 (Doc. 25).
4. The Parties offer this Motion to address the dates and customer notice for the LPHs. Unless the Commission has additional questions, a need no longer exists for the Commission to hold the July 13, 2026 prehearing conference to discuss these matters.
5. The Parties believe that LPHs would be beneficial in this matter, particularly so that all Parties and the Commission may hear from affected landowners and interested individuals. This case is unique in that Ameren Missouri requests authority for five generation projects, spanning four counties. So that the greatest number of individuals have the opportunity to attend an LPH, the Parties request that the

Commission hold three in-person LPHs and one virtual LPH, at the dates, times, and locations suggested in the table below.

6. The Parties respectfully offer the following for the Commission's consideration<sup>1</sup>:

| <b>Date/Time</b> | <b>Time</b> | <b>Location</b>                                                      |
|------------------|-------------|----------------------------------------------------------------------|
| July 28, 2026    | 12:00 p.m.  | Pike-Lincoln Technical Center<br>342 Vo Tech Road<br>Eolia, MO 63344 |
| July 28, 2026    | 6:00 p.m.   | YMCA-Y Café<br>309 S. Main St.<br>Vandalia, MO 63382                 |
| July 29, 2026    | 6:00 p.m.   | Advance Eagles<br>19095 Hwy C<br>Advance, MO 63730                   |
| July 30, 2026    | 6:00 p.m.   | Virtual via WebEx                                                    |

7. The Parties also requests that the Commission direct its Data Center to provide a copy of the order setting the local public hearings to the County Commissions of St. Louis, Audrain, Lincoln, and Stoddard Counties, to the members of the General Assembly representing St. Louis, Audrain, Lincoln, and Stoddard Counties, and to the news media serving St. Louis, Audrain, Lincoln, and Stoddard Counties. In addition, the Parties request that the Commission order Ameren Missouri to provide notice to all Ameren Missouri customers by email and/or text message who have consented to receive such communication. The Parties further request that Ameren Missouri send this notice no later than 3 days prior to the LPHs.

---

<sup>1</sup> Counsel for the OPC has previously contacted these venues and received preliminary assurance that they are available at these dates and times.

**Motion for Expedited Treatment**

8. The Parties further request that the Commission enter an Order setting the LPHs as identified above no later than July 14, 2026.
9. Entering the Order by this date will allow Ameren Missouri to provide the requested notice, while maintaining the proposed LPH dates. Retaining these dates will allow the Parties to consider statements made at the LPHs before filing their Rebuttal Testimony on August 7, 2026. Therefore, the harm that will be avoided by granting the request for expedited treatment is that it will avoid the necessity of renegotiating the dates included in the proposed procedural schedule.
10. This pleading was filed as soon as the parties were able to come to an agreement on the customer notice for the LPHs and therefore was filed as soon as it could have been.

WHEREFORE, the Parties respectfully request that the Commission: (1) set the LPHs as identified above, (2) order that notice be provided as detailed above, (3) cancel the July 13, 2026 prehearing conference, (4) enter its Order granting this relief no later than July 14, 2026, and (5) for any other relief deemed necessary and appropriate by the Commission.

Respectfully submitted,

**/s/ Jermaine Grubbs**

**Jermaine Grubbs**, MO Bar #68970

Senior Corporate Counsel

**Wendy K. Tatro**, Mo Bar #60261

Senior Director and Assistant General  
Counsel

Ameren Missouri

1901 Chouteau Avenue

St. Louis, MO 63103

Telephone: (314) 861-1705

Facsimile: (314) 554-4014

E-Mail: [AmerenMOService@ameren.com](mailto:AmerenMOService@ameren.com)

**/s/ Lindsay VanGerpen**

Lindsay VanGerpen (#71213)

Senior Counsel

Missouri Office of the Public Counsel

P.O. Box 2230

Jefferson City, MO 65102

Telephone: (573) 751-5565

Facsimile: (573) 751-5562

E-mail: [Lindsay.VanGerpen@opc.mo.gov](mailto:Lindsay.VanGerpen@opc.mo.gov)

**James B. Lowery**, Mo. Bar #40503  
JBL LAW, LLC  
9020 S. Barry Rd.  
Columbia, MO 65201  
Telephone: (573) 476-0050  
E-mail: [lowery@jblawllc.com](mailto:lowery@jblawllc.com)

**ATTORNEYS FOR UNION ELECTRIC  
COMPANY d/b/a AMEREN MISSOURI**

/s/ Nicole Mers

Nicole Mers, Bar No. 66766  
501 Fay Street  
Suite 206  
Columbia, MO 65201  
T:314-308-2729  
[nicole@renewmo.org](mailto:nicole@renewmo.org)

GENERAL COUNSEL FOR RENEW  
MISSOURI ADVOCATES

/s/ *Paul T. Graham* #30416

Senior Staff Counsel  
Missouri Public Service Commission  
P.O. Box 360  
Jefferson City, Mo 65102-0360  
(573) 522-8459  
[paul.graham@psc.mo.gov](mailto:paul.graham@psc.mo.gov)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the forgoing will be emailed to all counsel of record this 10th day of July 2026.

/s/ Lindsay VanGerpen