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 Facilities and Battery Energy Storage Systems.	))))))	File No. EA-2026-0183

MOTION FOR EXPEDITED TREATMENT AND REQUEST FOR AN ORDER EXTENDING THE EFFECTIVE DATE OF THE ORDER (ITEM 74) AS TO THE MILLCREEK BESS CERTIFICATE

COMES NOW Mary E. Geeding ("Applicant"), appearing on her own behalf as permitted by 20 CSR 4240-2.040(5), and under Sections 386.490.2 and 386.500.3, RSMo, and 20 CSR 4240-2.080(14), moves as follows:

I. RELIEF REQUESTED

1. Today Applicant filed her Application for Rehearing and Clarification of the Commission's Order Approving Stipulation and Agreement and Granting Certificates of Convenience and Necessity (Item 74) (the "Order") as to the Millcreek BESS Project (the "Application"). The Order "shall become effective on November 20, 2026." Order, Ordered ¶ 7. It is "considered effective at 12:00 a.m. on the effective date designated in the order." 20 CSR 4240-2.050(2).

2. Applicant asks the Commission to rule on her Application before 12:00 a.m. on November 20, 2026. In the alternative, she asks the Commission to extend the effective date of the Order solely as to the certificate for the Millcreek BESS Project until the earlier of (a) the Commission's ruling on the Application or (b) December 18, 2026. Every other part of the Order, including the certificates for the Castle Bluff, Huck Finn, Tom Sawyer and Ringer projects, would take effect as scheduled.

3. If the Commission does not act before the Order takes effect, Applicant asks in the further alternative that the Commission direct, under Section 386.500.3, RSMo, that the Application postpone the enforcement of the Order as to the Millcreek BESS certificate only, for

the same period. That section provides that an application for rehearing does not "stay or postpone the enforcement" of an order "except as the commission may by order direct." It places that power in the Commission and conditions it on no bond.

II. AUTHORITY

4. An order of the Commission takes effect "thirty days after the service thereof, except as otherwise provided," and continues in force "until changed or abrogated by the commission." Section 386.490.2, RSMo. An application for rehearing does not "stay or postpone the enforcement" of an order "except as the commission may by order direct." Section 386.500.3, RSMo. After rehearing, the Commission "may abrogate, change or modify" the original order. Section 386.500.4, RSMo. The Commission therefore has authority, by its own order, to extend the effective date of its own order, in whole or in part, while it considers an application for rehearing.

5. No bond or other security is required. Applicant does not ask for relief under Section 386.520, RSMo. That section applies to "an appeal under section 386.510," and it authorizes "the appellate court," after "the posting of an appropriate appeal bond," to stay or suspend an order. Section 386.520.1, RSMo. This Motion instead asks the Commission to exercise its own authority over the effective date of its own order. Neither Section 386.490.2 nor Section 386.500.3 conditions that authority on a bond, and Applicant is aware of no Commission rule that does. Applicant therefore asks that no bond or other security be required.

6. The request is limited in scope to the Millcreek BESS certificate and in time to no later than December 18, 2026. It concerns only the date on which the Order takes effect as to that certificate. It does not ask the Commission, by this Motion, to change any term of the Non-Unanimous Stipulation and Agreement (Item 63).

III. STATEMENTS REQUIRED BY 20 CSR 4240-2.080(14)

7. **(A) Date by which action is sought.** Applicant asks the Commission to act before 12:00 a.m. on Friday, November 20, 2026, or, if that is not practicable, as soon as possible

thereafter under paragraph 3 above. Because 20 CSR 4240-2.080(13) otherwise allows ten days to respond "unless otherwise ordered by the commission," Applicant asks that any responses to this Motion be due at such time as the Commission directs.

8. **(B) Harm avoided, benefit, and effect on customers and the general public.** An application for rehearing does not by itself postpone an order. Section 386.500.3. Unless the Commission acts, the Millcreek certificate will take effect while the Application is pending. The Missouri Department of Natural Resources has stated in writing that the Company's quarterly report for July through September 2026 lists a projected start date of November 2, 2026, for the Millcreek project, and that the Company reported no work done as of that report. Application, Ground Nine and Exhibit A. Work is now under way. On November 17, 2026, Applicant recorded video of a track-type tractor working bare ground at the Millcreek site, and on the morning of November 19, 2026, area residents photographed an excavator and a track loader removing vegetation and soil at the Millcreek site, and the Corps project manager for the project wrote that "[t]hat activity is certainly beyond what I would like to see prior to the NWP verification." That afternoon, at about 2:57 p.m., an area resident photographed a crushed-rock pad at the site entrance, with equipment and workers present. Application, Ground Nine and Exhibits E–H. Unless the Commission acts, that work may proceed under the certificate while the Application is pending. The Application identifies a description in the Order of an NFPA 855 compliance term that the Agreement does not contain, and it asks when the site-specific Hazard Mitigation Analysis for Millcreek must be filed. The Agreement ties Millcreek safety deliverables to construction milestones, including a public testing pleading due "at least 90 days prior to the installation of the batteries at the Millcreek site." Agreement ¶ 5(h)(ii). Prompt action, or a short extension, preserves the Commission's ability to decide those questions before the milestones approach, and gives the residents nearest the site a clear answer. Applicant is not aware of any negative effect on the Company's customers or the general public from an extension of four weeks or less: the other projects take effect as scheduled; the Order makes no ratemaking determination (Order, Ordered ¶¶ 5–6); and authority conferred by a certificate

remains valid if exercised "within a period of two years from the grant thereof." Section 393.170.3, RSMo. The Company itself reports to the Securities and Exchange Commission an in-service date for the Millcreek project in the "Second quarter 2028," and states that those dates "are dependent on the timing of regulatory approvals and construction completion, among other things." Ameren Corporation, Union Electric Company and Ameren Illinois Company, Combined Quarterly Report on Form 10-Q for the quarter ended September 30, 2026, Note 2, p. 18 (https://www.sec.gov/Archives/edgar/data/0001002910/000100291026000032/aee-20260930.htm). An extension of four weeks or less is small measured against that schedule.

9. **(C) Timing of this Motion.** This Motion is filed together with the Application and before the Order's effective date. Applicant is self-represented. Section 386.500.2, RSMo, requires an application for rehearing to "set forth specifically" each ground on which it relies, and preparing the Application to that standard took the time between the Order and this filing. This Motion could not usefully have been filed before the Application.

10. If any requirement of 20 CSR 4240-2.080 is not met by this Motion, Applicant asks the Commission to waive it under 20 CSR 4240-2.205, which permits waiver "upon a finding of good cause."

WHEREFORE, Applicant respectfully requests that the Commission:

(1) grant expedited treatment and order that any responses to this Motion be filed at such time as the Commission directs;

(2) rule on Applicant's Application for Rehearing before 12:00 a.m. on November 20, 2026;

(3) in the alternative, issue an order extending the effective date of the Order (Item 74) solely as to the certificate for the Millcreek BESS Project until the earlier of the Commission's ruling on the Application or December 18, 2026, with all other parts of the Order taking effect as scheduled, or, if the Order has taken effect, direct under Section 386.500.3 that the Application postpone the enforcement of the Order as to that certificate for the same period;

(4) require no bond or other security in connection with this relief; and

(5) grant such other relief as is just.

Respectfully submitted,

/s/ Mary E. Geeding
Mary E. Geeding, pro se
Silex, Missouri 63377
(mailing address on file, Item 66)
(636) 358-7152
mgeeding12@gmail.com

Dated: November 19, 2026

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Motion for Expedited Treatment was served by electronic mail on November 19, 2026, upon all counsel of record reflected on the Commission's official service list in File No. EA-2026-0183, namely: the Staff of the Commission (Staff Counsel's Office, staffcounselservice@psc.mo.gov; Paul T. Graham, paul.graham@psc.mo.gov); the Office of the Public Counsel (Marc Poston, opcservice@opc.mo.gov; Lindsay VanGerpen, lindsay.vangerpen@opc.mo.gov); Renew Missouri Advocates d/b/a Renew Missouri (Nicole Mers, nicole@renewmo.org); and Union Electric Company d/b/a Ameren Missouri (Jermaine Grubbs, jgrubbs@ameren.com; Wendy K. Tatro, amerenmoservice@ameren.com; James B. Lowery, lowery@jbllawllc.com).

/s/ Mary E. Geeding
Mary E. Geeding

Mary E. Geeding