

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

In the Matter of the Application of Ameren)	
Transmission Company of Illinois for Authority)	
To Acquire Electric Transmission Facilities from)	
Rolla Municipal Utilities and for a Certificate of)	File No. EA-2018-0327
Public Convenience and Necessity to Own,)	
Operate, Maintain, and Otherwise Control)	
And Manage those Facilities)	

JOINT MOTION TO ADOPT PROCEDURAL SCHEDULE

Under authority of and in accordance with 4 CSR 240-2.080, Ameren Transmission Company of Illinois (ATXI), the Staff of the Missouri Public Service Commission (Staff), the Office of the Public Counsel (Public Counsel), and the Missouri Department of Economic Development – Division of Energy (DE) jointly propose the following procedural schedule for this case:

1. On September 25, 2018, parties to this case met at a procedural conference to discuss a procedural schedule that would afford the Commission and interested parties time to fully consider ATXI's application and still complete that review so that, if approved, ATXI can commence project construction by February 1, 2019. The proposed procedural schedule resulting from those discussions is as follows:

EVENT	DATE
Filing Date/Direct Testimony	August 23, 2018
Staff Report/Rebuttal Testimony	October 25, 2018
Simultaneous Surrebuttal Testimony	November 15, 2018
Final Day for Submitting Discovery	November 16, 2018

List of Issues, List of Witnesses, and Order of Cross-Examination	November 19, 2018
Position Statements	November 21, 2018
Evidentiary Hearing	November 27-28, 2018
Initial Post-Hearing Briefs	December 14, 2018
Reply Briefs	December 28, 2018
Requested Order	January 23, 2019

Proposed Procedural Requirements

- (a) For rebuttal and surrebuttal testimony, all parties must comply with the requirements of Commission Rule 4 CSR 240-2.130 for prepared testimony, including the requirement that testimony be filed on line-numbered pages.
- (b) Although not all parties may agree upon how each issue should be described or on whether a listed issue is in fact a proper issue in this case, the parties will use their best efforts to agree upon and file a list of the issues to be heard, the witnesses to appear on each day of the hearing, the order in which witnesses will be called, and the order of cross-examination for each witness. The list of issues should be detailed enough to inform the Commission of each issue that must be resolved. The Commission should view any issue not contained in this list of issues as uncontested and not requiring resolution by the Commission.
- (c) Each party must file a simple and concise statement summarizing its position on each disputed issue.
- (d) All pleadings, briefs, and amendments shall be filed in accordance with Commission Rule 4 CSR 240-2.080. Briefs must follow the same list of issues as filed in the case and must set forth and cite the proper portions of the record concerning the remaining unresolved issues that are to be decided by the Commission.
- (e) If part of testimony or documents are prefiled and served upon the parties before a hearing, a party need only provide a copy of the testimony or document to the court reporter for marking as an exhibit. If not prefiled and served upon the parties, then a party who has a document marked for use at the hearing must have sufficient copies of the document to provide a copy not only to the court reporter, but also to each of the Commissioners, the presiding officer, and counsel for each other party.
- (f) All parties must provide copies of testimony (including schedules), exhibits, and pleadings to other counsel by electronic means and in electronic form, essentially concurrently with

the filing of such testimony, exhibits, or pleadings where the information is available in electronic format (.PDF, .DOC, .WPD, .XLS, etc.). Parties are not required to put information that does not already exist in electronic format into electronic format for purposes of exchanging.

- (g) Public documents filed in the Commission's Electronic Filing and Information System ("EFIS") are considered properly served by serving the same on counsel of record for all other parties via e-mail. The parties agree confidential documents may be obtained from EFIS and so agree not to serve those documents via e-mail.
- (h) Counsel for each party will receive electronically from all other parties serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. If a party desires the response to a data request that has been served on another party, the party desiring a copy of the response must request a copy of the response from the party answering the data request. If feasible and not voluminous as defined by Commission rule, data request responses should be served electronically on counsel for the requesting party. Data requests issued to or by Staff shall be submitted and responded to in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible.
- (i) The parties will make an effort to not include confidential information in data requests. If confidential information must be included in a data request, the confidential information shall be appropriately designated as such pursuant to Commission Rule 4 CSR 240-2.135.
- (j) The response time for all data requests submitted on or before October 25, 2018, will be fifteen (15) days, with five (5) business days to object or notify the requesting party that more than fifteen (15) days will be needed to provide requested information. Thereafter, the response time will be ten (10) days, with five (5) business days to object or notify the requesting party that more than ten (10) days will be needed to provide requested information. If a data request has been responded to, a party's request for a copy of the response will be timely responded to without waiting the full response time allowed.
- (k) Workpapers prepared in the course of developing a testimony will not be filed with the Commission but will be made available to each party within two (2) business days following a request for workpapers. Workpapers containing confidential information must be appropriately marked. If there are no workpapers associated with testimony, the party's attorney must so notify the other parties within the time allowed for providing those workpapers.
- (l) Where workpapers or data request responses include models or spreadsheets or similar information originally in a commonly available format where inputs or parameters may be changed to observe changes in inputs, if available in that original format, the party providing the workpaper or response will provide this type of information in that original format with formulas intact.
- (m) The signatories agree Commission Rule 4 CSR 2.090's requirement that a party must seek

a telephone conference with the presiding officer before filing a discovery motion will be waived for purposes of this case.

WHEREFORE, for the reasons previously stated, the moving parties request the Commission issue an order adopting the procedural schedule proposed in this motion.

/s/ L. Russell Mitten

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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing filing was served via e-mail on counsel for all parties of record on this 27th day of September 2018.

/s/ L. Russell Mitten