

**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) **File No. ET-2025-0184**
for Approval of New Modified Tariffs for)
Service to Large Load Customers)

JOINT PROPOSED PROCEDURAL SCHEDULE

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through undersigned counsel, on behalf of itself, Union Electric Company d/b/a Ameren Missouri, Missouri Industrial Energy Consumers, Renew Missouri, Google LLC, Amazon Data Services, Inc., and Sierra Club (collectively, the “Parties”),¹ and for this *Joint Proposed Procedural Schedule* respectfully states as follows:

1. On May 14, 2025, Union Electric Company d/b/a Ameren Missouri (“Ameren Missouri”) filed an application and supporting testimony seeking approval of a Large Load Customer Rate Plan and associated tariffs, a variance, and authorization to track Clean Energy Program revenues (the “Application”).
2. On May 19, 2025, the Commission issued its *Order Directing Notice, Setting an Intervention Deadline, and Directing Staff to file a Pleading* (the “Order”), which set a June 12, 2025, deadline for applications to intervene and for Staff to file a pleading indicating when it can file a recommendation regarding the Application (the “June 12 Pleading”).
3. On May 19, 2025, Missouri Industrial Energy Consumers filed an Application to Intervene.

¹ Office of the Public Counsel has indicated it is not joining this Joint Procedural Schedule.

4. On May 22, 2025, Google LLC filed an Application to Intervene.

5. On Thursday, May 27, 2025, Ameren Missouri filed a response to the Order.

Ameren Missouri's response stated in part that rather than having Staff file the June 12 Pleading, the Commission should schedule a Prehearing Conference on June 13 (or as soon thereafter as possible) so that applications to intervene may be addressed and the parties can discuss putting into a place a complete Procedural Schedule.

6. On Wednesday, June 3, 2025, the Commission entered its *Order Setting Webex Procedural Conference* on June 13, 2025, at 10:00 a.m.

7. On June 11, 2025, Renew Missouri filed an Application to Intervene.

8. On June 12, 2025, Sierra Club, Amazon Data Services Inc., Evergy Metro Inc. d/b/a Evergy Missouri Metro ("EMM"), and Evergy Missouri West, Inc. d/b/a Evergy Missouri West ("EMW") filed Applications to Intervene.

9. The Procedural Conference was held on June 13, 2025, and also on June 13, 2025, the Commission issued its *Notice of Rulings at Procedural Conference* (the "June Order").

10. The June Order states that the Regulatory Law Judge granted the intervention applications of Missouri Industrial Energy Consumers, Google LLC, Renew Missouri Advocates, Sierra Club, and Amazon Data Services, Inc. The June Order further states that Ameren Missouri was granted until June 23, 2025, to respond to EMM's and EMW's application to intervene, and EMM and EMW have until June 27, 2025, to reply. Additionally, the parties were granted until June 23, 2025, to file a proposed procedural schedule.

11. In accordance with the June Order, the Parties hereby submit this Proposed

Procedural Schedule:

Event	Date
Application and Testimony	May 14
Staff Rec / Rebuttal and Intervenor Rebuttal	September 5
Surrebuttal and Cross -Surrebuttal (all parties)	October 30
List of Issues	November 5
Last Day to Request Discovery ²	November 6
Position Statements	November 10
Settlement Conference ³	November 12
Evidentiary Hearing	November 17 -21 ⁴
Initial Briefs	December 23
Reply Briefs	January 9

12. The Parties request that the Commission adopt the following procedures regarding discovery:

a. All parties shall provide copies of testimony (including schedules), exhibits, and pleadings to other counsel of record 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. Parties are not required to put information that does not exist in electronic format into electronic format for purposes of exchanging it.

b. Parties shall make all reasonable efforts to not include confidential information in data requests. If confidential information must be included in data requests, the confidential information will be appropriately designated as such pursuant to 20 CSR 4240-2.135.

c. 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 shall agree upon and file a list of the issues to be heard, the witnesses

² Last day to propound data requests or notice a deposition.

³ This date is scheduled to encourage settlement discussions in an attempt to resolve the case narrow the issues but does not impose an obligation on any party to participate in settlement discussions.

⁴ Staff notes that one of its witnesses will be unavailable for hearing on November 17 and November 18. This has been communicated to the Parties and no objection has been received.

to appear on each day of the hearing, the order in which they 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 parties recognize that the Commission may view any issue not contained in this list of issues to be uncontested and not requiring resolution by the Commission. Each party shall file a simple and concise statement summarizing its position on each disputed issue, including citations to pre-filed testimony supporting its position.

d. All pleadings, briefs, and amendments shall be filed in accordance with Commission Rule 20 CSR 4240-2.080. Briefs shall follow the same list of issues as filed in the case and must set forth and cite proper portions of the record concerning the remaining unresolved issues that are to be decided by the Commission.

e. Data requests issued to or by Staff shall be submitted and responded to in the Commission's Electronic Filing and Information System ("EFIS"), if feasible, or in electronic format on compact disc or by other means agreed to by counsel, if infeasible. Counsel for each party shall receive electronically from each other party serving a data request, an electronic copy of the text of the "description" of that data request contemporaneously with service of the data request. Regarding Staff-issued data requests, if the description contains confidential information, or is voluminous, a hyperlink to the EFIS record of that data request shall be considered a sufficient copy. 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. Data requests shall be sent by e-mail to counsel for the other parties. Counsel may designate other personnel to be added to the service list for data requests, but shall assume responsibility for compliance with any restrictions on confidentiality. Data request responses shall be served on counsel for the requesting party, unless waived by counsel, and on the requesting party's employee or representative who submitted the data request, and shall be served electronically, if feasible and not voluminous as defined by Commission rule. In the case of Ameren Missouri data request responses, Ameren Missouri shall post its data request responses on its Caseworks Extranet site and send an email notifying the parties when it posts its response; however, in the case of responses to data requests Staff issues, Ameren Missouri shall also submit the responses to Staff data requests in EFIS, if feasible, or in electronic format on compact disc or by other means agreed to by Staff counsel, if infeasible.

f. Upon the approval of this procedural schedule by the Commission, the response time for all data requests shall be 10 business days, and 5 business days to object or notify that more than 10 business days will be needed to provide the requested information. Data requests sent after 5:00 pm will be considered served on the next business day. The Commission may rule on discovery motions filed after Staff's Recommendation/Rebuttal and Intervenor Rebuttal is filed without holding the conference required by 20 CSR 4240- 2.090(8)(B).

g. Workpapers prepared in the course of developing a witness' testimony (including schedules) and exhibits shall not be filed with the Commission, but shall be submitted to each party within 2 business days following the filing of the particular testimony, unless a party has indicated that it does not want to receive some or all of the workpapers. Workpapers containing confidential information shall be appropriately marked. Counsel shall undertake to advise other counsel if the sponsored witness has no workpapers related to the round of testimony.

h. 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 or outputs, if available in that original format, the party providing the workpaper or response shall provide this type of information in that original format with formulas intact. Workpapers shall be provided in electronic format by e-mailing or by delivery of a compact disc or other electronic storage media.

i. Documents filed in EFIS shall be considered properly served by serving the same on counsel of record for all other parties via e-mail.

j. The Parties request expedited transcripts for the evidentiary hearing, with transcripts to be filed in EFIS no later than five business days after the last day of the evidentiary hearing.

WHEREFORE, Staff respectfully proposes this procedural schedule on behalf of the Parties and requests the Commission issue an order establishing a procedural schedule in accordance with the above proposal.

Respectfully submitted,

/s/ Alexandra Klaus

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**Attorneys for the Staff of the Missouri
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to all parties and/or counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 23rd day of June, 2025.

/s/ Alexandra Klaus