

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

In the Matter of the Application of Ameren	)	
Transmission Company of Illinois for a	)	
Certificate of Convenience and Necessity	)	
under Section 393.170.1, RSMo, Relating	)	File No. EA-2024-0302
to Transmission Investments in Northwest	)	
and Northeast Missouri	)	

**MOTION FOR LEAVE TO LATE FILE THE REBUTTAL TESTIMONY OF  
AMEREN TRANSMISSION COMPANY OF ILLINOIS' WITNESSES  
SAM MORRIS, JAMES NICHOLAS, AND LEAH DETTMERS**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and for its Motion for Leave to Late File the Rebuttal Testimony of ATXI witnesses Sam Morris, James Nicholas, and Leah Dettmers, states as follows:

1. Per the Order Setting Procedural Schedule issued in this proceeding by the Missouri Public Service Commission (Commission) on July 8, 2025, a procedural schedule was adopted with Rebuttal Testimony (Optional) due August 14, 2025.

2. Due to a death in the family of Carmen L. Fosco, counsel for ATXI in this proceeding, he was fully or significantly unavailable to work on ATXI's rebuttal testimony from Friday, August 8, 2025, through Tuesday, August 12, 2025.

3. In addition, three (3) of the landowner intervenor witnesses filed their direct testimony as entirely Confidential, leading to questions as to which portions, if any, of ATXI's rebuttal testimony could be filed as public non-redacted testimony.

4. While all reasonable efforts were made to complete and file ATXI's rebuttal testimony by the August 14, 2025 due date, the unplanned unavailability of Mr. Fosco and the uncertainty regarding treatment of intervenors' entirely Confidential direct testimony referenced

in ATXI's rebuttal testimony, the rebuttal testimony ATXI witnesses Sam Morris, James Nicholas, and Leah Dettmers was filed on EFIS between 12:01 A.M. and 12:44 A.M. on August 15, 2025.<sup>1</sup>

5. No party was or will be prejudiced by the slight delay of filing the rebuttal testimony of ATXI witnesses Sam Morris, James Nicholas, and Leah Dettmers.

WHEREFORE, ATXI respectfully requests the Commission enter an order accepting the late filed rebuttal testimony of ATXI witnesses Sam Morris, James Nicholas, and Leah Dettmers, along with any further relief the Commission deems proper

Dated: September 3, 2025

Respectfully submitted,

/s/ Carmen L. Fosco

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<sup>1</sup> The Rebuttal Testimony of ATXI witness Mr. Chris Korsmeyer, the only rebuttal testimony ATXI determined could be filed as a fully public document, was filed on EFIS on August 14, 2025.

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record and parties appearing *pro se* as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on September 3, 2025.

/s/. Carmen L. Fosco

Carmen L. Fosco