

**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 to Transmission)
Investments in Northwest and Northeast Missouri)

File No. EA-2024-0302

**MOTION FOR LEAVE TO FILE CORRECTED SURREBUTTAL TESTIMONY OF
CLAIRE M. EUBANKS, P.E. AND LATE FILE SCHEDULE CME-s3**

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the undersigned counsel, and respectfully states as follows:

1. Staff witness Claire Eubanks, P.E., filed surrebuttal testimony in this matter on August 28, 2025. Ms. Eubanks responded to the rebuttal testimonies of Ameren Transmission Company of Illinois (“ATXI”) witnesses Sam Morris and James Nicholas, filed on August 14, 2025, which were marked confidential in their entirety. Thus, page 2, lines 15-21 and page 3, lines 1-15 of Ms. Eubanks surrebuttal testimony were marked confidential.

2. On October 16, 2025, ATXI re-filed the rebuttal testimonies of Mr. Morris and Mr. Nicholas, removing the confidential designations to their portions of testimony that Ms. Eubanks responded to. Due to these changes, none of Ms. Eubanks surrebuttal testimony, as filed on August 28, 2025, should be marked confidential.

3. In addition to the above, on page, 2, lines 17-20 of Ms. Eubanks surrebuttal testimony, she states:

Several modifications discussed by ATXI in the rebuttal testimony of Sam Morris in response to landowner proposals in this case appear feasible. Staff intends to prepare a summary of proposed options based on the testimony of ATXI and landowners for the Commission’s reference after additional discovery is complete.

4. Attached to this filing is the corrected surrebuttal testimony of Claire Eubanks, with the now unnecessary confidential markings removed, and the summary described above, to be attached to the surrebuttal testimony of Ms. Eubanks as Schedule CME-s3. Schedule CME-s3 contains confidential information.

5. Commission Rule 20 CSR 4240-2.130(10) prohibits a party from supplementing pre-filed testimony unless ordered to do so by the presiding officer or the Commission. Staff believes the information within Schedule CME-s3 is a helpful reference for the Commission and parties for the evidentiary hearing scheduled on October 27, 2025, and respectfully requests leave from the Commission to attach Schedule CME-s3 to the corrected surrebuttal testimony of Ms. Eubanks.

WHEREFORE, Staff respectfully requests the Commission grant this motion for leave to file the corrected surrebuttal testimony of Staff witness Claire Eubanks, P.E., for Staff to late file Schedule CME-s3, and for any other relief considered just and proper under the circumstances.

Respectfully submitted,

/s/ Eric Vandergriff
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 22nd day of October, 2025.

/s/ Eric Vandergriff