

From: Doug Noland <doug@nolandlawfirm.com>

Date: March 8, 2013, 4:04:12 PM CST

To: <Robert.kenney@psc.mo.gov>

Subject: Ameren Power Line

Dear Chairman Kenney:

Please see the attached letter and documents regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Robert S. Kenney – Chairman
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Robert.kenney@psc.mo.gov

Re: Ameren Power Line

Dear Chairman Kenney:

This letter is written on behalf of many property owners and citizens who are adversely affected by an attempt by Ameren to construct a high voltage transmission line in Clay County, Missouri. The attempted line runs from a new construction, LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months the property owners and citizens have been voicing their objection to this power line to their Representatives and State Senator to no avail. We later found out that this Commission had provided some permission, authority or necessity, however it is phrased, to Ameren for this line. There was no property owner, no concerned citizen that was affected by this that was aware of this action. There was no public meeting held on this until the property owners and concerned citizens themselves organized a public meeting last night in Liberty, Missouri, to voice their unified objections to this power line.

There are alternatives available to Ameren's proposed power line that would not interfere with the property owners' property rights and concerns for their health and safety.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

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Robert S. Kenney – Chairman
Page 2

- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

All of these alternatives would not require a new high voltage power line to be constructed. The alternatives would be less intrusive to all property owners in the area, and cause less interference to their property, and not interfere with their health and safety.

It was stated to several of us through the County Commissioner in Clay County that Kansas City Power and Light would be supplying to this facility. That position is apparently not correct as Ameren is threatening eminent domain on all of the affected property owners. I am enclosing with this letter copies of letters that we have sent to our Representatives in the past, as well as two Petitions that have been signed by a number of property owners and affected citizens by this power line. Because we have been told that voicing an objection to you as Commissioners of the Public Service Commission is an appropriate remedy that property owners and affected citizens have in this, and we would seek your consideration and also ask that if any attempts at condemnation by Ameren could be delayed until all of the viable alternatives that the public citizens and property owners have put forth on this matter be considered.

Thank you for your attention.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

cc: Betty Miller
Glenn Miller
Kenneth R. Wright
Scott Morron
Chris Daniels

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Robert S. Kenney – Chairman
Page 3

Barbara Schmitt
James R. Schmitt
Craig Johnson
Julie R. Johnson
Gary L. Osten
Robert Shemwell
Rick Spurgeon
Luann Ridgeway
Lyndell Brenton
Edward J. Busch
Paul Schneegass
Patricia A. Shemwell
Danny Barron
Chris Daniels
Steve Calder
Andrea Busch
Gayle S. Wood
Bonnie Tarwater
Penny Johnson
Ryan Silvey
T.J. Berry
Pam Mason
Luann Ridgeway

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-751-5562

Lewis R. Mills, Esq.
Public Counsel
Missouri Office of the Public Counsel
Governor Office Building, Suite 650
200 Madison Street
P.O. Box 2230
Jefferson City, MO 65102-2230
Email: lewis.mills@ded.mo.gov

Re: Ameren

Dear Mr. Mills:

On behalf of property owners and a number of citizens who are adversely affected, this is some information that has been generated regarding an attempt by Ameren to construct a high voltage transmission line from the LMV Plant in Liberty, Missouri, to the Clarksboro/Windsor Estates subdivision. This is all in Clay County, Missouri.

At a public meeting last night, a number of people voiced their objection to this proposed line. I am enclosing a Petition signed by a number of people voicing their objections. We have a transcript being prepared of the meeting that when is available, it will be supplied to you. I am also enclosing some correspondence that has been made to some of our Representatives and State Senators in the past without any progress. None of the citizens or property owners were aware of any proceeding commenced before the Public Service Commission by Ameren for the construction of this line in its attempt to gain a certificate of necessity. If we had known, we would have made our voice and objection known at that time. Ameren has threatened eminent domain proceedings and we would request any postponement of that until any of these complaints filed by the numerous citizens and property owners to be addressed by the Public Service Commission, if that is a remedy that the property owners and public citizens have a right to.

Thank you.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

October 30, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

This letter is to voice an objection to the installation of a 69kV electrical line proposed by Ameren electrical company running from the LMV Automotive Systems plant (Magna) on 69 Highway east to near the Clarksboro and H Highway junction. The proposed line which passes over 7 property owners is a significant impairment of the property rights of all of the property owners.

The property owners include land belonging to my wife, Carolyn Noland, which is a family farm that has been in her family for three generations; land belonging to my father, Robert Noland, who has owned and operated a family farm for nearly forty years; Tom and Bonita Tarwater, who live on the property that has been in their family for two generations; and Dr. Robert Shemwell and Rick Spurgeon who have both owned their property for over 25 years with the plan for future development.

There are a number of people that live adjacent to the proposed line and a number of residents who live off of Clarksboro Avenue near H Highway that, even though the line is not directly on their property, object to its placement and location.

The significance of the proposed line, a 69,000 volt power line with a proposed 50 foot easement to run parallel to an existing 100 foot easement that has been in existence for over 50 years, is a substantial impairment and interferes with the property rights of all of the people affected by this line. It significantly effects the future development plans and usage of the property. The future use of this land for housing or any commercial development is greatly effected. No one wants to live near a 69,000 volt power line or build a house next to it, with the health concerns that exist on such lines, or use it for any commercial property interest.

The line as proposed would also amount to a tandem easement with parallel electrical lines and poles that significantly restrict the use and value of the property and its aesthetic appearance. Dual power lines and dual poles are so obtrusive and offensive that they are almost non-existent in any other location. This dual usage would make the property undesirable and restrict any future development or use for housing or any other commercial use on property that at some point would have to be considered prime development area within the city limits of Liberty and the county. Three of the land owners are within Liberty, and the others are within the county. Future use of the property for single family housing would be virtually impossible due to the proposed line and its location, and any other future commercial development would also be effected.

It appears to me, as well as the other property owners, that there are other alternatives that could be considered and utilized.

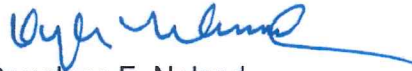
1. Use of the existing right of way down H Highway and B Highway that already belongs to Ameren and along 69 Highway that is already serviced by an electrical easement;
2. Obtaining the power through an alternative source rather than the proposed site at or near the Clarksboro and H Highway junction;
3. A easement alongside the railroad that runs north and south, parallel to the Magna building;
4. Power could be obtained through KCP&L or another provider that may have sufficient power in the location of the Magna plant without having to run new lines;
5. Along 69 Highway using the existing easement; or
6. Power by my understanding is already supplied by Ameren to one of the other buildings in the Heartland Meadows industrial park near the Magna plant. If power is already supplied to that location, could the source not be upgraded and used for the Magna plant? Why does Ameren need to run such an obtrusive and detrimental line to get to the Magna plant?

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Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 3

The property rights of individuals and operator of family farms, their future use and development rights and all of the benefits of their property should not be sacrificed by the interest of one utility company and their desire to sell power to one other business. Property owners should have rights and their interests in their property should be protected. Their use and future development interests are just as important as the wishes of one utility company, particularly when other alternative sites, locations and power sources are available that would be less intrusive and objectionable to any landowner and would, in all likelihood, be more economical and practical to accomplish.

Thank you for your assistance in this matter.

Sincerely,



Douglass F. Noland

DFN:rw

cc: Rep. T.J. Berry via first-class mail
Rep. Myron Neth via first-class mail

Governor Jay Nixon

November 25, 2012

Representative T.J. Berry

Representative Myron Neth

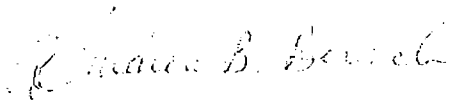
Clay County Eastern Commissioner Luann Ridgeway

Doug Noland, Noland Law Firm, LLC

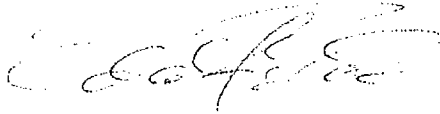
The enclosed petition is a response from the residents of Windsor Estates in Clay County Missouri. The residents of East and West Clarksboro stand together to oppose the construction, installation and placement of a 69kV electric line by Ameren Electric. We feel the placement of this line would be unsightly, unsafe and decrease property values in our neighborhood. We feel other solutions need to be reviewed and approved by all involved. Thank you for taking the time to review this statement and noting the concerns of the homeowners listed in the pages of the petition.

Residents of 9620 W. Clarksboro, Liberty, Missouri:

Andrea B. Busch



Edward J. Busch



PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|-------------------------|------------------------------|
| Sign | <u>Andrea B. Busch</u> | <u>9620 W Clarksboro</u> |
| Print | <u>Andrea Busch</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>Edward J. Busch</u> | <u>9620 W CLARKSBORO</u> |
| Print | <u>EDWARD J BUSCH</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>James Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print | <u>JAMES FRYER</u> | <u>LIBERTY, MO. 64068</u> |
| Sign | <u>Billie Fryer</u> | <u>9618 W CLARKSBORO DR</u> |
| Print | <u>BILLIE FRYER</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Paul Schneeweiss</u> | <u>9412 W CLARKSBORO</u> |
| Print | <u>PAUL SCHNEEWEISS</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Lori Schneeweiss</u> | <u>9412 W CLARKSBORO DR</u> |
| Print | <u>LORI SCHNEEWEISS</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Judi Coble</u> | <u>9505 W. CLARKSBORO DR</u> |
| Print | <u>JUDI COBLE</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Cheryl Morrow</u> | <u>9518 W Clarksboro</u> |
| Print | <u>Cheryl Morrow</u> | <u>Liberty, Mo 64068</u> |

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| <u>NAME</u> | | <u>ADDRESS</u> |
|-------------|-----------------------|------------------------------------|
| Sign | <u>Thomas Evans</u> | <u>9823 CLARKSBORO W 64068</u> |
| Print | <u>THOMAS LEVANS</u> | <u>LIBERTY MO.</u> |
| Sign | <u>Robin Evans</u> | <u>9823 CLARKSBORO W.</u> |
| Print | <u>ROBIN L. EVANS</u> | <u>LIBERTY MO. 64068</u> |
| Sign | <u>Glenn Miller</u> | <u>9816 CLARKSBORO DR. W 64068</u> |
| Print | <u>GLENN MILLER</u> | <u>LIBERTY, MO</u> |
| Sign | <u>Betty Miller</u> | <u>SAME</u> |
| Print | <u>BETTY MILLER</u> | |
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PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | NAME | ADDRESS |
|-------|-------------------|--------------------------|
| Sign | Brenda K McCarver | 9720 E. Clarksboro Dr |
| Print | Brenda K McCarver | Liberty MO 64068 |
| Sign | R L McCarver | 9720 E CLARKSBORO |
| Print | R L. McCARVER | LIBERTY MO. 64068 |
| Sign | Penny Johnson | 9713 E CLARKSBORO |
| Print | PENNY JOHNSON | LIBERTY MO 64068 |
| Sign | Jack Johnson | 9713 E CLARKSBORO |
| Print | JACK JOHNSON | LIBERTY MO 64068 |
| Sign | Phyllis Stoenkel | 9521 E. Clarksboro Drive |
| Print | Phyllis Stoenkel | Liberty, MO 64068 |
| Sign | Jim Lee | 9716 Clarksboro Dr |
| Print | JIM LEE | Liberty MO 64068 |
| Sign | Sandra Hemminger | 17401 H Highway |
| Print | Sandra Hemminger | Liberty, MO 64068 |
| Sign | James Hemminger | 17401 H Highway |
| Print | JAMES HEMMINGER | Liberty, MO 64068 |

NAME

ADDRESS

Sign Kathleen J. Schmitt
Print Kathleen J. Schmitt

7623 West Clarksberg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print JAMES R. Schmitt

7603 West Clarksberg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print James R. Schmitt

7603 West Clarksberg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print James R. Schmitt

7603 West Clarksberg Dr.
Liberty, MO 64068

Sign M. L. Thompson
Print M. L. Thompson

7603 West Clarksberg Dr.
Liberty, MO 64068

Sign Mike Thompson
Print Mike Thompson

9510 Clark'sburg Dr.
Liberty, MO 64068

Sign Linda Hoover
Print LINDA HOOPER

9413 W CLARKSBURG DR
Liberty, MO 64068

Sign George Hoover
Print George Hoover

9413 W CLARKSBURG DR
Liberty, MO 64068

Sign Scott Murray
Print Scott Murray

9510 W. Clarksburg Dr
Liberty, MO 64068

Sign George Weed
Print George Weed

9625 E Clarksburg Dr.
Liberty, MO 64068

NAME

ADDRESS

Sign

Print

[Signature]
 Georgia Daniels

9718 W. CLARKSBORO
 LIBERTY, MO. 64668

Sign

Print

[Signature]
 Chris Daniels

9718 W. CLARKSBORO
 LIBERTY, MO. 64668

Sign

Print

[Signature]
 GAIL ROBERTS

9721 W. CLARKSBORO DR
 LIBERTY, MO. 64668

Sign

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[Signature]
 Robert L. Roberts

9721 W. CLARKSBORO DR
 LIBERTY, MO. 64668

Sign

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[Signature]
 Gary L. Oster

9809 W. CLARKSBORO DR
 LIBERTY, MO. 64664

Sign

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[Signature]
 Lynn & Dick Wright

9904 W. CLARKSBORO
 LIBERTY, MO. 64668

Sign

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[Signature]
 Gary Phillips

9825 E. CLARKSBORO DR
 LIBERTY, MO. 64668

Sign

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 Marla L. Kasper

9903 E. CLARKSBORO DR
 LIBERTY, MO. 64668

Sign

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[Signature]
 Joseph D. Leonard

9813 E. CLARKSBORO DR
 LIBERTY, MO. 64668

Sign

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[Signature]
 Julie R. Johnson

9723 E. CLARKSBORO DR
 LIBERTY, MO. 64668

NAME

ADDRESS

Sign *[Signature]*
Print Tiffany Becker

17405 NE 97th St.
Liberty, MO 64068

Sign *[Signature]*
Print Ryan Becker

17405 NE 97th St
Liberty, MO 64068

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

November 28, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

Enclosed please find a letter I received from Andrea and Edward Bush along with a Petition signed by all of the residents of Windsor Estates in Clay County where Ameren has proposed the installation of a 69kV electrical line.

Thank you again for your attention in this matter.

Sincerely,


Douglass F. Noland

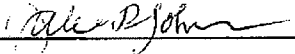
DFN:rw
Enclosure

PETITION

WE, the undersigned, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri. Signed and dated this 7th day of March, 2013.

| <u>NAME</u> | <u>ADDRESS - Email</u> |
|--|--|
| Sign <u>Betty Miller</u> Print <u>BETTY MILLER</u> | <u>9816 CLARKSBORO DR W LIBERTY MO</u> <u>craftygal3@aol.com 816-218-5543</u> <u>(224)</u> |
| Sign <u>Jan Miller</u> Print <u>Jan Miller</u> <u>WRIGHTFOOT01@Gmail.com</u> | <u>" Jane ↑</u> <u>816-392-9919 (cell)</u> |
| Sign <u>Kenneth R Wright</u> Print <u>Kenneth R Wright</u> | <u>9904 CLARKSBORO DR. W.</u> <u>Liberty, MO</u> |
| Sign <u>Scott Morrow</u> Print <u>Scott Morrow</u> | <u>9518 W Clarksboro Dr</u> <u>Liberty MO 64068</u> <u>smorrow6057@gmail.com</u> |
| Sign <u>Chris Daniels</u> Print <u>Chris Daniels</u> | <u>9718 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> |
| Sign <u>Barbara Schmitt</u> Print <u>Barbara Schmitt</u> | <u>9603 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> <u>bj590@att.net</u> |
| Sign <u>James R. Schmitt</u> Print <u>JAMES R. Schmitt</u> | <u>9603 W. Clarksboro Dr.</u> <u>Liberty, MO 64068</u> |
| Sign <u>Craig Johnson</u> Print <u>Craig Johnson</u> | <u>9723 E Clarksboro Dr.</u> <u>Liberty MO 64068</u> <u>craig.johnson@hallmark.com</u> |

NAMEADDRESS + Email

Sign 
Print Julie R. Johnson

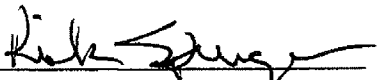
9723 E Clarksboro Dr.
Liberty Mo 64068
Julie@AgilityBranding.com

Sign Gary Oster
Print Gary L. Oster

9809 Clarksboro Dr
Liberty Mo 64068
goster@usps.gov

Sign Robert P. Shemwell
Print Robert P. Shemwell

10206 Ridgview Rd
Liberty Mo 64068
PATTYANN49
@ATT.NET

Sign 
Print Rick Spurgeon


12690 S Hallet St
Olathe KS 66062
rspurgeon@olatheks.org

Sign LUANN Ridgeway
Print LUANN Ridgeway

19405 County Line Rd
Smithville MO 64089

Sign 
Print LYNZELL BRENTON


Liberty, Mo 64068

Sign 
Print EDWARDS J. BUSCH

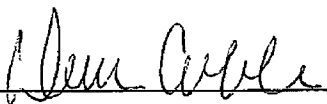
9620 W. CLARKSBORO
ebusch@acs-1.com

Sign 
Print PAUL SCHNEEGASS

9412 W CLARKSBORO
lorischneegass@yahoo.com

Sign 
Print PATRICIA A. Shemwell

10206 Ridgview Rd
Liberty Mo 64068

Sign 
Print Deen Able

9505 CLARKSBORO DRW.
ACOBLE@BUBLITZ.CO.COM

NAME

ADDRESS + Email

Sign Donny Baron
Print DANNY BARON DonnyBaronLiberty@gmail.com
1 Center

Sign Chris Daniels
Print Chris Daniels 9718 W Clarksboro Dr
Liberty MO, 64068 cdanielsamc@iol.com

Sign Steve Calder
Print Steve Calder 9825 Clarksboro Dr E
Scalder@americanmidwestKC.com

Sign Andrea Busch
Print Andrea Busch 9620 W. Clarksboro
abusch@liberty.k12.mo.us

Sign Gayle S. Wood
Print Gayle S. Wood 9625 E Clarksboro Dr
gayleswood@gmail.com

Sign _____
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NAME

ADDRESS + Email

Sign Donna Lamm 6TARWATER@GENERALUSA.COM
Print Donna Lamm 6TARWATER

Sign Penny Johnson penny.johnson45@yahoo.com
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From: Scott Morrow <Scott.Morrow@LRA-INC.com>

Date: March 8, 2013, 2:02:11 PM CST

To: "Robert.kenney@psc.mo.gov" <Robert.kenney@psc.mo.gov>

Subject: Regarding Ameren's attempt to build a high voltage transmission line from the LMV Plant in Liberty to the Windsor Estate subdivision

Dear Mr. Kenney,

I want to express my concerns for Ameren's attempt to build a high voltage transmission line from the LMV Plant in Liberty to the Windsor Estate subdivision.

I live at 9518 West Clarksboro Drive and the proposed power line would basically be in my back yard. (the length of my property)

While I understand the need for more jobs in Missouri and the new plant will provide additional funds to Missouri and the power companies, I want you to place yourself in our shoes.

We moved to the country 19 years ago, are raising our children, whom play in our large lots, fly kites, we fly model airplanes, as well as enjoy being outdoors as a family. We moved here to get away from the city and everything that goes along with living in the city.

The proposed power lines will dramatically reduce our property values and there are proven health risks with living near high voltage lines.

There are several alternatives to placing the new transmission line and affecting many landowners in Liberty and in rural Clay County.

1. Reclassifying the territory to allow KCP&L to supply power to the LMV plant.
2. Require Ameren to obtain power from its Mosby power station on 69 highway using the exiting power poles.
3. Require Ameren and the Cooperative continue to work together to allow Ameren to use power from the existing Cooperative line.
4. Encourage KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L that already has power near the LMV Plant.

Please consider them and please work towards a safer and practical solution.

Thank you for your time,

Scott Morrow
9518 West Clarksboro Drive
Liberty, MO 64068

816-769-0149

From: Carolyn Noland <noland.ca@gmail.com>

Date: March 10, 2013, 7:22:09 PM CDT

To: <robert.kenney@psc.mo.gov>

Subject: Ameren Powerline - Clay Co MO

Dear Mr. Kenney

My name is Carolyn Noland and I would like to voice my objection regarding the Ameren powerline that is to be constructed for the benefit of the LMV Plant in Clay Co. I am the owner of a family farm that has been in my family for three generations and would like to voice my objection regarding the Ameren Line (a 69v transmission line) that is currently being proposed to provide power to the LMV Plant in Clay Co. There has been a powerline on the property since it has been owned by my family. Ameren is proposing to build an additional 69v transmission powerline with an additional easement to run parallel to the existing powerline. This will be similar to an 8 lane highway (the existing easement plus the additional easement) going thru the middle of my property which will cut it in half. I believe this will hurt the future development prospects of my property - as who would want to deal with a double utility easement in the middle of the property. We have voiced our objections over this powerline since we have learned of it to our State Representatives and our County Commissioner. We were lead to believe by our County Commissioner that KCP&L was going to provide the power. We just recently found out this was not the case and that Ameren had filed something with the Missouri Public Service regarding the construction of a powerline to provide power to the LMV plant. We were never notified by our State Representatives Myron Neth and TJ Berry or our County Commissioner about the filing and thus not able to voice an objection. Our State Representatives also never suggested that we file a complaint with the Public Service Commission and thus we just recently found out we were able to voice a complaint.

I think there are other alternatives available to Ameren putting this line in that will not affect my property or the property of the other land owners this powerline affects.

The alternatives would be:

1. To reclassify the territory to allow KCP&L (which already has power in the area) to supply the power to the LMV Plant.
2. To have Ameren and the Cooperative (the existing powerline) to work together to allow Ameren to obtain power from the Cooperative line. My understanding is that the Cooperative line is currently supplying the power to the LMV Plant and could continue to do so.

3. To require Ameren to obtain the power from their power station at Mosby along 69 Highway to the LMV Plant by using the existing power lines or upgrading their lines and using the right of way already in existence.

4. To encourage KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L through a meter agreement. KCP&L currently has a power station near the LMV Plant.

I believe these are workable alternatives that would not require a new high voltage powerline to be constructed through my family farm and the other property owners involved. It would also be less intrusive and cause less interference to all the property owners this

powerline would affect - especially the residents of the Clarksboro subdivision.

Thank you for considering this complaint.

Carolyn Noland

From: Rick Spurgeon <RSpurgeon@OLATHEKS.ORG>

Date: March 11, 2013, 5:48:23 PM CDT

To: <Robert.kenney@psc.mo.gov>, <Terry.jarrett@psc.mo.gov>, <Steve.stoll@psc.mo.gov>, <Bill.kenney@psc.mo.gov>

Cc: <pmason@claycountymo.gov>, <lridgeway@claycountymo.gov>, <Ryan.Silvey@house.mo.gov>, <Myron.Neth@house.mo.gov>, TJ Berry <TJ.Berry@house.mo.gov>, Doug Noland <doug@nolandlawfirm.com>

Subject: Liberty, MO Ameren proposed powerline

I am sure you are aware of the proposed new overhead utility that Ameren is charging ahead to install near Liberty, MO. Had one of my neighbors, who caught a crew on-site, failed to contact me, I would not have known of the proposed installation to cross my property until nearly the day the installation began. Ameren has offered me a miserably tiny amount compared the damage I will receive by the powerline installation. But they seem, in essence, to say 'too bad' and that is the price I will receive with no alternative.

I purchased that property about two decades ago, with the long-range intent of selling for development when it arrives. Now that day is near and Ameren wants to snatch my retirement fund from me. Any development whatsoever will view that powerline as a detriment. It strictly limits future changes in use. That ground then becomes a liability to pay taxes on while not having use of it, plus the area still has to be maintained through mowing, etc. Of course, this does not even consider health / aesthetic concerns of adjacent, and other nearby, house lots that will substantially reduces home prices. I know future uses will never be considered, but since I will be providing 'infrastructure' for a large profit center for Ameren, perhaps I can provide the acreage at no cost, and then participate in annual profits for the life of the easement?

I suggested each of the following possibilities to Ameren at some point. Each was refuted as not possible, yet each one is. There are likely other alternatives that I have not thought of.

- 1 Allow KCP&L to provide metered power to Ameren, who would then provide it to the LMV plant. KCP&L is presently nearly at the back door of the plant.
- 2 Use, or upgrade, the existing Ameren line along 69 Highway from the Ameren substation.
- 3 Re-classify the tiny corner of Ameren's territory to KCP&L. On paper, it looks as though it should have been KCP&L to begin with.
- 4 Use, or upgrade, the existing cooperative line (easement) paralleling the proposed new one. Why double dip the property owners when it is not required?

From Ameren's past maintenance history, I am concerned about their lines crossing near me, too. Their reputation, acquired from a number of situations (most notably the upper Taum Sauk Reservoir incident), makes me want to avoid any contact with them. If I noticed, during a casual visit, that the reservoir looked to be near failure, surely they knew of the possibility, yet no action was taken.

I understand that both the City of Liberty, and various business interests want to see this project completed. I just believe it can be completed with far less damage to the property rights of individuals. There are many alternatives to be considered. If Ameren is planning annual revenue in the millions of dollars, why do they have to drive over the top of us tiny landowners to save a few bucks, if it even saves that? During the history of America, this type of action has always been frowned upon.

Please consider helping to solve the dilemma of providing electricity to the LMV plant with a more viable alternative. Stop Ameren's headlong advance over the top of us, and allow them to re-route in some manner.

If you would like to speak (or email) with me, please feel free to contact me. Thank you for your time, and thank you for allowing me to vent as the trodden individual I am (individuals we are).

Rick Spurgeon

913 634-1515

From: Doug Noland <doug@nolandlawfirm.com>

Date: March 11, 2013, 10:56:19 AM CDT

To: <Robert.kenney@psc.mo.gov>

Subject: Ameren Power Line

Dear Chairman Kenney:

Please see the attached letter on behalf of Robert and Anna Noland regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 11, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Robert S. Kenney – Chairman
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Robert.kenney@psc.mo.gov

Re: Ameren Power Line

Dear Chairman Kenney:

This letter is on behalf of Robert and Anna Noland who are 89 and 90 years of age and own 170-acre farm in Liberty, Clay County, Missouri. Ameren is attempting to construct a high voltage transmission line across their property and has threatened eminent domain. The attempted line runs from a new plant construction, the LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months they have voiced their objection to this power line to their Representatives and State Senator to no avail. The County Commissioner had led us to believe that power to the LMV Plant was going to be supplied by Kansas City Power & Light, and that the power line would not be built. Then we learned that Ameren had filed something with the Public Service Commission for this power line and we were never notified of that, nor to our knowledge no other person affected by this power line, including our neighbors and those people that live in the Clarksboro/Windsor Estates subdivision were not notified as well. There has never been a public meeting until just last week when the property owners and concerned citizens got together themselves to voice their objection to this power line in a public place.

There are alternatives available to Ameren building this proposed power line.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant. This would go down 69 Highway on existing right of way.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

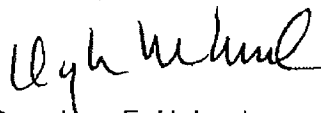
All of these alternatives would not require a new high voltage power line to be constructed through our property and our neighbors' properties. The alternatives would be less intrusive to us and all property owners in the area, and cause less interference to all of our property, and not interfere with our health and safety.

We are farmers and continue to operate a cow/calf operation on this 170-acre farm. There is already one power line across the property which is a cooperative line that has been there since we bought the property, over 35 years ago. Ameren's attempt to build another power line, and they want to run it parallel to the existing power line, would amount to an eight-lane interstate highway going through the middle of our property. It is the same with our neighbors to the west, Tom Tarwater and Carolyn Noland, and to the east, Robert Shemwell. It seems unfair that Ameren can attempt to build this power line when there are other alternatives available without going through our property and our neighbors' properties. This will have a significant and devastating effect on our property rights and future development.

Can Ameren's attempt at eminent domain be suspended until all of the alternatives are considered and our voice and objection are heard?

Thank you for your consideration in this matter.

Sincerely,



Douglass F. Noland
On Behalf of Robert and Anna Noland

From: Doug Noland [<mailto:doug@nolandlawfirm.com>]

Sent: Tuesday, March 12, 2013 4:20 PM

To: Kenney, Bill

Subject: Ameren Power Line

Dear Commissioner Kenney:

Please see the attached letter and attachment regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

William P. Kenney, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Bill.kenney@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Kenney:

I have previously contacted each of you regarding our objection to a high voltage transmission line being prepared by Ameren in Liberty, Clay County, Missouri. I, and a number of citizens, filed a complaint online as was suggested to us at the public meeting that we had last week, where the citizens were finally able to voice their opposition in public to this power line.

Enclosed is the response that I received from the Consumer Service Department of the Missouri Public Service in response to the complaint filed. We would take issue with the response.

1. The response from the Consumer Service Department indicates that Ameren is unable to deliver the requisite amount of power to its new customer's business site. From our information, we would question that because Ameren is already providing power to this site. There are lights on at the location, which you can see by driving by the LMV building at night. Our State Representative T.J. Berry said that the LMV plant was currently being supplied power through a cooperative line and could continue to do so for several years.
2. There are other numerous alternatives of which Ameren can obtain this power to this location, which it appears from the response, were never even addressed. The alternatives are:

- a. Taking the power from the Cooperative line, which is already there. We were told at the public meeting that the Cooperative line was able to provide power for several years.
 - b. Upgrading route along 69 Highway from the Mosby Ameren power station to the LMV Plant.
 - c. Acquiring power from KCP&L, which we have been told has sufficient power, right next to the LMV Plant.
3. It appears from the response that the Commission's order was issued based solely upon information that Ameren had supplied, not listening or considering these alternatives.
4. I guess our questions to this Commission from this response by the Consumer Service Department are:
 - a. Do citizens and property owners not have a right and an opportunity to voice some objection to a high voltage transmission line that goes across their property, or adjacent to their property? Does there not have to be some type of public notice and an opportunity to be heard?
 - b. Does Due Process require any input from the citizens and property owners who are vastly affected by this line to have notice and some right of hearing before a decision that affects their rights is made? Or can the Commission just consider all the evidence from Ameren and not hear what the landowners say?
5. It appears that the Consumer Service Department's response is based only on information that Ameren supplied.
6. We would also take exception in Paragraph 4 where it says no public comments were received prior to approval. The public, the property owners, the people of the subdivision who live right next to this, had no idea that this was even going on because we were never told.
7. It seems to us that CSR 240-3.105 provides that notice should be required.

**"4 CSR 240-3.105 Filing Requirements for Electric Utility
Applications for Certificates of Convenience and Necessity**

(1) In addition to the requirements of 4 CSR 240-2.060(1), applications by an electric utility for a certificate of convenience and necessity shall include:

(A) If the application is for a service area—

1. A statement as to the same or similar utility service, regulated and nonregulated, available in the area requested;


2. If there are ten (10) or more residents or landowners, the name and address of no fewer than ten (10) persons residing in the proposed service area or of no fewer than ten (10) landowners in the event there are no residences in the area, or, if there are fewer than ten (10) residents or landowners, the name and address of all residents and landowners;"

No property owner or affected citizen was provided such notice and such is not in the application filed by Ameren. If, as the Consumer Service response is, that this is for a service line, it is a line that is not in Ameren's territory. It appears that they had to go into KCP&L area to run this line. So, would not that be a service outside their area that notice to 10 landowners would be required? And are not the citizens of the Clarksboro/Windsor Estates subdivision who are in KCP&L territory affected?

8. It seems from the Consumer Service response that the Public Service Commission's approval of the certificate of necessity was based only on information provided by Ameren. No opportunity for the public to provide their side or for the alternatives to building the power line addressed. No citizens had any notice or right to provide any input in the Public Service Commission's findings.

Thank you for your continued consideration.

Sincerely,


Douglass F. Notland

DFN:kss
Enclosures

doug

From: PSC Info (Public Info Email Address) - PSC [pscinfo@psc.mo.gov]
Sent: Tuesday, March 12, 2013 12:31 PM
To: 'doug@nolandlawfirm.com'
Subject: RE: Public Service Commission - Complaint Form

Dear Mr. Noland,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your comments regarding Ameren Missouri and the construction of a high voltage transmission line in Clay County. Your comments have been filed into the official case file of the Missouri Public Service Commission. The official case file number is EA-2013-0316.

On November 29, 2012, Ameren Missouri filed an application with the Missouri Public Service Commission ("Commission") for a Certificate of Convenience and Necessity to construct, install, own, operate, control, manage and maintain an electric sub-transmission line to provide electric service in Clay County, Missouri, for a new customer locating to Ameren Missouri's existing territory.

Commission rules on Certificates of Convenience and Necessity (CCNs) (4 CSR 240-3.105) have two distinct parts: Service Areas vs. line certificates. The utility would have been required to provide the name and addresses of the affected property owners if it was a request for new service territory. However, the request to extend the transmission line in Clay County in GA-2013-0316 was a request for a line certificate and Ameren Missouri was granted no new service area.

On December 17, 2012, the PSC Staff filed a recommendation advising the Commission to approve the application. In its recommendation, the PSC Staff stated that the new electric sub-transmission line is necessary because Ameren Missouri is currently unable to deliver the requisite amount of power to its new customer's business site.

On January 3, 2013 the Missouri Public Service Commission approved an application filed by Ameren Missouri seeking Commission authority to install, own and operate an electric sub-transmission line in Clay County near Liberty, Missouri. According to the application, the proposed line would provide electric service for a new customer locating to Ameren Missouri's existing territory. This line extension is to provide necessary power to the LMV automotive plant that will employ approximately 150 workers. The Commission approved the extension of 899 feet. Ameren did not have to get permission to build the majority of the line because it is in its own service territory. The Commission was only involved because one small piece of it went into the service territory of another IOU (KCP&L GMO). No public comments were received prior to the approval. Kansas City Power & Light Greater Missouri Operations did not oppose the Application.

If you have further questions regarding this case or any additional comments please contact our office at 1-800-392-4211. Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office.

Sincerely,

Consumer Service Department
Missouri Public Service Commission

From: EFIS Messenger
Sent: Friday, March 08, 2013 4:16 PM
To: Consumer Services
Subject: Public Service Commission - Complaint Form

From: Carolyn Noland [<mailto:noland.ca@gmail.com>]

Sent: Tuesday, March 12, 2013 4:49 PM

To: Kenney, Bill

Subject: Official Case File No. EA20130316

Dear Commissioner Kenney:

Please see the attached letter which was also faxed to you regarding the Ameren power line in Liberty, Clay County, Missouri / Official Case File No. EA20130316.

Please let me know your thoughts on this matter.

Carolyn A. Noland

N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
816-781-6898
noland.ca@gmail.com

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

William P. Kenney, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Bill.kenney@psc.mo.gov

RE: Official Case File No. EA20130316

Dear Commissioner Kenney:

I am writing in response to an email I received from "Customer Service Department Public Service Commission" on March 12, 2013, in response to a complaint I filed regarding Ameren's attempt to build a 69kV transmission line across my property. While I appreciate the Public Service Commission's (PSC) prompt response to my complaint, I felt it was lacking in several respects. The PSC provided no explanation as to why there were no public comments received prior to their January 3, 2013, approval of the application filed by Ameren seeking authority to build this new 69kV line. The PSC received no input nor did it seek any input from those residents and landowners who will be tremendously affected by the construction of this new line. I do not believe the process followed by the PSC and approval of Ameren's application was fair and was such that those who would be affected by this were not able to voice their thoughts and concerns regarding Ameren's plans. In addition, I do not believe the PSC followed its own rules because the residents or landowners who are affected by the PSC's January 3, 2013, approval were never contacted, despite the fact that there is a requirement to do so, according to your own rules. I also do not believe that the information that the PSC relied upon to make its determination is accurate. Your email states that the PSC staff found that the new electrical subtransmission line is necessary because Ameren is currently unable to deliver power to the LMV Plant. However, it is common knowledge for those who live near the LMV Plant that it currently is receiving power from an existing 69,000 volt line that is already in place. And Ameren is also able to deliver power to the Plant by any of the alternatives that I have listed in my complaint if anyone at the PSC would be willing to read and consider those in its review of the application.

March 12, 2013
William P. Kenney, Commissioner
Page 2

I would simply ask that the PSC take the thoughts and suggestions of these alternative routes from these many residents and landowners before making its decision. I simply do not understand how in the PSC's mission to represent all Missourians and how the landowners affected by this proposed power line would have been completely and totally ignored and not informed and then completely ignored after being informed.

Again, I would ask that the PSC reconsider its approval of Ameren's application and reverse its decision and seek the input of someone other than Ameren, who is an advocate for the line, and coming to factual determinations as to how best to deliver power to the LMV Plant so as to be fair to all of the parties involved in the matter and not just rely upon statements of fact by Ameren.

I would appreciate your prompt response in this matter and look forward to hearing from you.

Sincerely,



Carolyn A. Noland

On Mar 12, 2013, at 3:36 PM, "Doug Noland" <doug@nolandlawfirm.com> wrote:

Dear Commissioner Jarrett:

Please see the attached letter and attachment regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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<Letter to Commissioner Terry Jarrett with attachment.03-12-2013.pdf>

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 11, 2013 TIME SENT:
SENT BY: Douglass F. Noland FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Terry M. Jarrett, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: 3 (Including Information Sheet)

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL BACK AS SOON
AS POSSIBLE!

Telephone: (816) 781-5055 - Ask For: Kathy S. Suddarth

We are transmitting from a Toshiba Super G3.

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 11, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Terry M. Jarrett, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Terry.jarrett@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Jarrett:

This letter is on behalf of Robert and Anna Noland who are 89 and 90 years of age and own 170-acre farm in Liberty, Clay County, Missouri. Ameren is attempting to construct a high voltage transmission line across their property and has threatened eminent domain. The attempted line runs from a new plant construction, the LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months they have voiced their objection to this power line to their Representatives and State Senator to no avail. The County Commissioner had led us to believe that power to the LMV Plant was going to be supplied by Kansas City Power & Light, and that the power line would not be built. Then we learned that Ameren had filed something with the Public Service Commission for this power line and we were never notified of that, nor to our knowledge no other person affected by this power line, including our neighbors and those people that live in the Clarksboro/Windsor Estates subdivision were not notified as well. There has never been a public meeting until just last week when the property owners and concerned citizens got together themselves to voice their objection to this power line in a public place.

There are alternatives available to Ameren building this proposed power line.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

March 11, 2013
Terry M. Jarrett, Commissioner
Page 2

- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant. This would go down 69 Highway on existing right of way.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

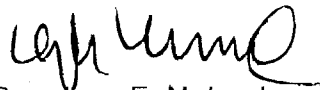
All of these alternatives would not require a new high voltage power line to be constructed through our property and our neighbors' properties. The alternatives would be less intrusive to us and all property owners in the area, and cause less interference to all of our property, and not interfere with our health and safety.

We are farmers and continue to operate a cow/calf operation on this 170-acre farm. There is already one power line across the property which is a cooperative line that has been there since we bought the property, over 35 years ago. Ameren's attempt to build another power line, and they want to run it parallel to the existing power line, would amount to an eight-lane interstate highway going through the middle of our property. It is the same with our neighbors to the west, Tom Tarwater and Carolyn Noland, and to the east, Robert Shemwell. It seems unfair that Ameren can attempt to build this power line when there are other alternatives available without going through our property and our neighbors' properties. This will have a significant and devastating effect on our property rights and future development.

Can Ameren's attempt at eminent domain be suspended until all of the alternatives are considered and our voice and objection are heard?

Thank you for your consideration in this matter.

Sincerely,



Douglass F. Noland
On Behalf of Robert and Anna Noland

DFN:kss

On Mar 12, 2013, at 3:50 PM, "Carolyn Noland" <noland.ca@gmail.com> wrote:

Dear Commissioner Jarrett:

Please see the attached letter which was also faxed to you regarding the Ameren power line in Liberty, Clay County, Missouri / Official Case File No. EA20130316.

Please let me know your thoughts on this matter.

Carolyn A. Noland

<Official Case File No. EA20130316.Commissioner Terry Jarrett.pdf>

N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
noland.ca@gmail.com

TELECOPIER INFORMATION SHEET

DATE: March 12, 2013

SENT BY: Carolyn A. Noland

FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

| | |
|---------------------|------------------------------------|
| Name of Individual: | Terry M. Jarrett, Commissioner |
| Firm Name: | Missouri Public Service Commission |
| Fax No.: | 573-526-7341 |

Total Number of Pages: 3 (Including Information Sheet)

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N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
816-781-6898
noland.ca@gmail.com

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Terry M. Jarrett, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Terry.jarrett@psc.mo.gov

RE: Official Case File No. EA20130316

Dear Commissioner Jarrett:

I am writing in response to an email I received from "Customer Service Department Public Service Commission" on March 12, 2013, in response to a complaint I filed regarding Ameren's attempt to build a 69kV transmission line across my property. While I appreciate the Public Service Commission's (PSC) prompt response to my complaint, I felt it was lacking in several respects. The PSC provided no explanation as to why there were no public comments received prior to their January 3, 2013, approval of the application filed by Ameren seeking authority to build this new 69kV line. The PSC received no input nor did it seek any input from those residents and landowners who will be tremendously affected by the construction of this new line. I do not believe the process followed by the PSC and approval of Ameren's application was fair and was such that those who would be affected by this were not able to voice their thoughts and concerns regarding Ameren's plans. In addition, I do not believe the PSC followed its own rules because the residents or landowners who are affected by the PSC's January 3, 2013, approval were never contacted, despite the fact that there is a requirement to do so, according to your own rules. I also do not believe that the information that the PSC relied upon to make its determination is accurate. Your email states that the PSC staff found that the new electrical subtransmission line is necessary because Ameren is currently unable to deliver power to the LMV Plant. However, it is common knowledge for those who live near the LMV Plant that it currently is receiving power from an existing 69,000 volt line that is already in place. And Ameren is also able to deliver power to the Plant by any of the alternatives that I have listed in my complaint if anyone at the PSC would be willing to read and consider those in its review of the application.

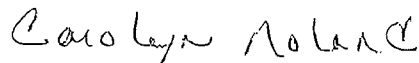
March 12, 2013
Terry M. Jarrett, Commissioner
Page 2

I would simply ask that the PSC take the thoughts and suggestions of these alternative routes from these many residents and landowners before making its decision. I simply do not understand how in the PSC's mission to represent all Missourians and how the landowners affected by this proposed power line would have been completely and totally ignored and not informed and then completely ignored after being informed.

Again, I would ask that the PSC reconsider its approval of Ameren's application and reverse its decision and seek the input of someone other than Ameren, who is an advocate for the line, and coming to factual determinations as to how best to deliver power to the LMV Plant so as to be fair to all of the parties involved in the matter and not just rely upon statements of fact by Ameren.

I would appreciate your prompt response in this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn A. Noland".

Carolyn A. Noland

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 8, 2013

TIME SENT:

SENT BY: Douglass F. Noland

FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Terry M. Jarrett, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: 20 (Including Information Sheet)

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL BACK AS SOON
AS POSSIBLE!

Telephone: (816) 781-5055 - Ask For: Kathy S. Suddarth

We are transmitting from a Toshiba Super G3.

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SERVICE. THANK YOU.

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Terry M. Jarrett, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Terry.jarrett@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Jarrett:

This letter is written on behalf of many property owners and citizens who are adversely affected by an attempt by Ameren to construct a high voltage transmission line in Clay County, Missouri. The attempted line runs from a new construction, LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months the property owners and citizens have been voicing their objection to this power line to their Representatives and State Senator to no avail. We later found out that this Commission had provided some permission, authority or necessity, however it is phrased, to Ameren for this line. There was no property owner, no concerned citizen that was affected by this that was aware of this action. There was no public meeting held on this until the property owners and concerned citizens themselves organized a public meeting last night in Liberty, Missouri, to voice their unified objections to this power line.

There are alternatives available to Ameren's proposed power line that would not interfere with the property owners' property rights and concerns for their health and safety.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

March 8, 2013

Terry M. Jarrett, Commissioner

Page 2


- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

All of these alternatives would not require a new high voltage power line to be constructed. The alternatives would be less intrusive to all property owners in the area, and cause less interference to their property, and not interfere with their health and safety.

It was stated to several of us through the County Commissioner in Clay County that Kansas City Power and Light would be supplying to this facility. That position is apparently not correct as Ameren is threatening eminent domain on all of the affected property owners. I am enclosing with this letter copies of letters that we have sent to our Representatives in the past, as well as two Petitions that have been signed by a number of property owners and affected citizens by this power line. Because we have been told that voicing an objection to you as Commissioners of the Public Service Commission is an appropriate remedy that property owners and affected citizens have in this, and we would seek your consideration and also ask that if any attempts at condemnation by Ameren could be delayed until all of the viable alternatives that the public citizens and property owners have put forth on this matter be considered.

Thank you for your attention.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

cc: Betty Miller
Glenn Miller
Kenneth R. Wright
Scott Morron
Chris Daniels

March 8, 2013
Terry M. Jarrett, Commissioner
Page 3

Barbara Schmitt
James R. Schmitt
Craig Johnson
Julie R. Johnson
Gary L. Osten
Robert Shemwell
Rick Spurgeon
Luann Ridgeway
Lyndell Brenton
Edward J. Busch
Paul Schneegass
Patricia A. Shemwell
Danny Barron
Chris Daniels
Steve Calder
Andrea Busch
Gayle S. Wood
Bonnie Tarwater
Penny Johnson
Ryan Silvey
T.J. Berry
Pam Mason
Luann Ridgeway

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-751-5562

Lewis R. Mills, Esq.
Public Counsel
Missouri Office of the Public Counsel
Governor Office Building, Suite 650
200 Madison Street
P.O. Box 2230
Jefferson City, MO 65102-2230
Email: lewis.mills@ded.mo.gov

Re: Ameren

Dear Mr. Mills:

On behalf of property owners and a number of citizens who are adversely affected, this is some information that has been generated regarding an attempt by Ameren to construct a high voltage transmission line from the LMV Plant in Liberty, Missouri, to the Clarksboro/Windsor Estates subdivision. This is all in Clay County, Missouri.

At a public meeting last night, a number of people voiced their objection to this proposed line. I am enclosing a Petition signed by a number of people voicing their objections. We have a transcript being prepared of the meeting that when is available, it will be supplied to you. I am also enclosing some correspondence that has been made to some of our Representatives and State Senators in the past without any progress. None of the citizens or property owners were aware of any proceeding commenced before the Public Service Commission by Ameren for the construction of this line in its attempt to gain a certificate of necessity. If we had known, we would have made our voice and objection known at that time. Ameren has threatened eminent domain proceedings and we would request any postponement of that until any of these complaints filed by the numerous citizens and property owners to be addressed by the Public Service Commission, if that is a remedy that the property owners and public citizens have a right to.

Thank you.

Sincerely,


Douglass F. Noland

DFN:kss
Enclosures

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

October 30, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

This letter is to voice an objection to the installation of a 69kV electrical line proposed by Ameren electrical company running from the LMV Automotive Systems plant (Magna) on 69 Highway east to near the Clarksboro and H Highway junction. The proposed line which passes over 7 property owners is a significant impairment of the property rights of all of the property owners.

The property owners include land belonging to my wife, Carolyn Noland, which is a family farm that has been in her family for three generations; land belonging to my father, Robert Noland, who has owned and operated a family farm for nearly forty years; Tom and Bonita Tarwater, who live on the property that has been in their family for two generations; and Dr. Robert Shemwell and Rick Spurgeon who have both owned their property for over 25 years with the plan for future development.

There are a number of people that live adjacent to the proposed line and a number of residents who live off of Clarksboro Avenue near H Highway that, even though the line is not directly on their property, object to its placement and location.

October 30, 2012
Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 2

The significance of the proposed line, a 69,000 volt power line with a proposed 50 foot easement to run parallel to an existing 100 foot easement that has been in existence for over 50 years, is a substantial impairment and interferes with the property rights of all of the people affected by this line. It significantly effects the future development plans and usage of the property. The future use of this land for housing or any commercial development is greatly effected. No one wants to live near a 69,000 volt power line or build a house next to it, with the health concerns that exist on such lines, or use it for any commercial property interest.

The line as proposed would also amount to a tandem easement with parallel electrical lines and poles that significantly restrict the use and value of the property and its aesthetic appearance. Dual power lines and dual poles are so obtrusive and offensive that they are almost non-existent in any other location. This dual usage would make the property undesirable and restrict any future development or use for housing or any other commercial use on property that at some point would have to be considered prime development area within the city limits of Liberty and the county. Three of the land owners are within Liberty, and the others are within the county. Future use of the property for single family housing would be virtually impossible due to the proposed line and its location, and any other future commercial development would also be effected.

It appears to me, as well as the other property owners, that there are other alternatives that could be considered and utilized.

1. Use of the existing right of way down H Highway and B Highway that already belongs to Ameren and along 69 Highway that is already serviced by an electrical easement;
2. Obtaining the power through an alternative source rather than the proposed site at or near the Clarksboro and H Highway junction;
3. A easement alongside the railroad that runs north and south, parallel to the Magna building;
4. Power could be obtained through KCP&L or another provider that may have sufficient power in the location of the Magna plant without having to run new lines;
5. Along 69 Highway using the existing easement; or
6. Power by my understanding is already supplied by Ameren to one of the other buildings in the Heartland Meadows industrial park near the Magna plant. If power is already supplied to that location, could the source not be upgraded and used for the Magna plant? Why does Ameren need to run such an obtrusive and detrimental line to get to the Magna plant?

October 30, 2012
Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 3

The property rights of individuals and operator of family farms, their future use and development rights and all of the benefits of their property should not be sacrificed by the interest of one utility company and their desire to sell power to one other business. Property owners should have rights and their interests in their property should be protected. Their use and future development interests are just as important as the wishes of one utility company, particularly when other alternative sites, locations and power sources are available that would be less intrusive and objectionable to any landowner and would, in all likelihood, be more economical and practical to accomplish.

Thank you for your assistance in this matter.

Sincerely,



Douglass F. Noland

DFN:rw

cc: Rep. T.J. Berry via first-class mail
Rep. Myron Neth via first-class mail

Governor Jay Nixon

November 25, 2012

Representative T.J. Berry

Representative Myron Neth

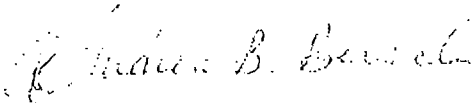
Clay County Eastern Commissioner Luann Ridgeway

Doug Noland, Noland Law Firm, LLC

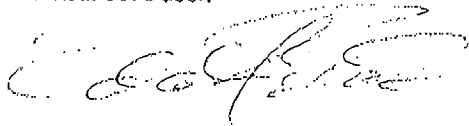
The enclosed petition is a response from the residents of Windsor Estates in Clay County Missouri. The residents of East and West Clarksboro stand together to oppose the construction, installation and placement of a 69kV electric line by Ameren Electric. We feel the placement of this line would be unsightly, unsafe and decrease property values in our neighborhood. We feel other solutions need to be reviewed and approved by all involved. Thank you for taking the time to review this statement and noting the concerns of the homeowners listed in the pages of the petition.

Residents of 9620 W. Clarksboro, Liberty, Missouri:

Andrea B. Busch



Edward J. Busch



PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|-------------------------|------------------------------|
| Sign | <u>Andrea B Busch</u> | <u>9620 W Clarksboro-</u> |
| Print | <u>Andrea Busch</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>Edward J. Busch</u> | <u>9620 W. CLARKSBORO</u> |
| Print | <u>EDWARD J. BUSCH</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>James Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print | <u>JAMES FRYER</u> | <u>LIBERTY, MO. 64068</u> |
| Sign | <u>Billie Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print | <u>BILLIE FRYER</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Paul Schneeweiss</u> | <u>9412 W CLARKSBORO</u> |
| Print | <u>PAUL SCHNEEWEISS</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Lori Schneeweiss</u> | <u>9412 W. CLARKSBORO DR</u> |
| Print | <u>LORI SCHNEEWEISS</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Judi Coble</u> | <u>9505 W. CLARKSBORO DR</u> |
| Print | <u>JUDI COBLE</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Cheryl Morrow</u> | <u>9518 W. Clarksboro</u> |
| Print | <u>Cheryl Morrow</u> | <u>Liberty, MO 64068</u> |

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| <u>NAME</u> | <u>ADDRESS</u> |
|-----------------------------|------------------------------------|
| Sign <u>[Signature]</u> | <u>9823 CLARKSBORO W 64068</u> |
| Print <u>THOMAS LEVANS</u> | <u>LIBERTY MO.</u> |
| Sign <u>[Signature]</u> | <u>9823 CLARKSBORO W.</u> |
| Print <u>RUBIN L. EVANS</u> | <u>LIBERTY MO. 64068</u> |
| Sign <u>[Signature]</u> | <u>9816 CLARKSBORO DR. W 64068</u> |
| Print <u>GLENN MILLER</u> | <u>LIBERTY MO</u> |
| Sign <u>[Signature]</u> | <u>SAME</u> |
| Print <u>BETTY MILLER</u> | |
| Sign _____ | _____ |
| Print _____ | _____ |
| Sign _____ | _____ |
| Print _____ | _____ |
| Sign _____ | _____ |
| Print _____ | _____ |
| Sign _____ | _____ |
| Print _____ | _____ |

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|-------------------|--------------------------|
| Sign | Brenda K McCarish | 9720 E Clarksboro Dr |
| Print | Brenda K McCarish | Liberty MO 64068 |
| Sign | R L McCarish | 9720 E CLARKSBORO |
| Print | R L. McCARISH | LIBERTY MO. 64068 |
| Sign | Penny Johnson | 9013 E CLARKSBORO |
| Print | PENNY JOHNSON | LIBERTY MO 64068 |
| Sign | Jack Johnson | 9013 E CLARKSBORO |
| Print | JACK JOHNSON | LIBERTY MO 64068 |
| Sign | Phyllis Stoeckel | 9521 E. Clarksboro Drive |
| Print | Phyllis Stoeckel | Liberty, MO 64068 |
| Sign | Jim Kane | 9521 E. Clarksboro Dr |
| Print | JIM KANE | LIBERTY MO 64068 |
| Sign | Andrea Hemenway | 17401 H Highway |
| Print | Andrea Hemenway | Liberty, MO 64068 |
| Sign | James Hemenway | 17401 H Highway |
| Print | JAMES HEMENWAY | LIBERTY MO 64068 |

NAMEADDRESS

Sign

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9623 West Clarksberg Dr.
Liberty, MO 640689603 West Clarksberg Dr.
Liberty, MO 640689603 West Clarksberg Dr.
Liberty, MO 640689603 West Clarksberg Dr.
Liberty, MO 640689603 West Clarksberg Dr.
Liberty, MO 640689550 CLARKSBURG DR WEST
LIBERTY MO 640689413 W. CLARKSBURG DR
Liberty MO 640689413 W. CLARKSBURG DR
Liberty, MO 640689510 W. Clarksberg Dr
Liberty, MO 640689625 E Clarksberg Dr.
Liberty, MO 64068

NAMEADDRESS

Sign

Print

[Signature] 9718 W. CLARKSBORO
Georgia Daniels Liberty, MO 64068

Sign

Print

[Signature] 9718 W. CLARKSBORO
Chris Daniels Liberty, MO 64068

Sign

Print

[Signature] 9721 W. CLARKSBORO DR
GAIL ROBERTS Liberty, MO 64068

Sign

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[Signature] 9721 W. CLARKSBORO DR
Robert L Roberts Liberty, MO 64068

Sign

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[Signature] 9809 W. CLARKSBORO DR
Terry Logan Liberty, MO 64064

Sign

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[Signature] 9904 W. CLARKSBORO
Lynn & Dick Wright Liberty, MO 64068

Sign

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[Signature] 9820 E. CLARKSBORO DR
Larry Phillips Liberty, MO 64068

Sign

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[Signature] 9903 E. CLARKSBORO DR
Maria Lopez Liberty, MO 64068

Sign

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[Signature] 9813 E. CLARKSBORO DR
Joseph P. Leonard Liberty, MO 64068

Sign

Print

[Signature] 9723 E. CLARKSBORO DR
Julie R. Johnson Liberty, MO 64068

NAMEADDRESS

Sign

Print

17405 NE 97th St.

Liberty, MO 64068

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17405 NE 97th St.

Liberty, MO 64068

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

November 28, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

Enclosed please find a letter I received from Andrea and Edward Bush along with a Petition signed by all of the residents of Windsor Estates in Clay County where Ameren has proposed the installation of a 69kV electrical line.

Thank you again for your attention in this matter.

Sincerely,

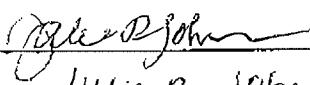
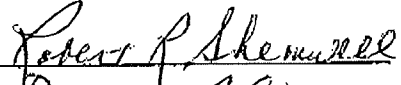
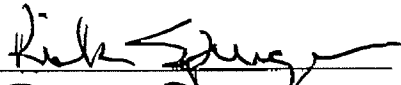
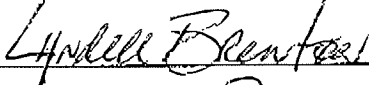

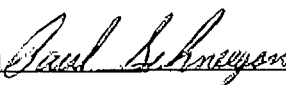
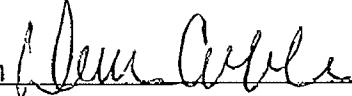

Douglass F. Noland

DFN:rw
Enclosure

PETITION

WE, the undersigned, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri. Signed and dated this 7th day of March, 2013.

| <u>NAME</u> | <u>ADDRESS - Email</u> |
|--|--|
| Sign <u>Betty Miller</u> Print <u>BETTY MILLER</u> | <u>9816 CLARKSBORO DR W LIBERTY MO</u> <u>craftygal3@aol.com 816.218.5543</u> <u>(224)</u> |
| Sign <u>[Signature]</u> Print <u>GLORIA MILLER</u> | <u>" JANE ↑</u> <u>816-392.9919 (cell)</u> |
| <u>WRIGHTFOODS1@G.MAIL.COM</u> Sign <u>[Signature]</u> Print <u>Kenneth R Wright</u> | <u>9904 CLARKSBORO DR. W.</u> <u>Liberty, MO</u> |
| Sign <u>[Signature]</u> Print <u>Scott Mowen</u> | <u>9518 W Clarksboro Dr</u> <u>Liberty MO 64068</u> <u>smowenw657@gmail.com</u> |
| Sign <u>[Signature]</u> Print <u>Chris Daniels</u> | <u>9718 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> |
| Sign <u>Barbara Schmitt</u> Print <u>Barbara Schmitt</u> | <u>9603 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> <u>bjs90@att.net</u> |
| Sign <u>[Signature]</u> Print <u>JAMES R. Schmitt</u> | <u>9603 W. Clarksboro Dr.</u> <u>Liberty, MO USA</u> |
| Sign <u>[Signature]</u> Print <u>Craig Johnson</u> | <u>9723 E Clarksboro Dr.</u> <u>Liberty MO 64068</u> <u>craig.johnson@hallmark.com</u> |

| NAME | ADDRESS + Email |
|--|--|
| Sign <u></u> Print Julie R. JOHNSON | 9723 E Clarksboro Dr. Liberty MO 64068 Julie@AgilityBranding.com |
| Sign <u>Gary Oster</u> Print gary.L.Oster@usps.gov | 9809 Clarksboro Dr Liberty MO 64068 |
| Sign <u></u> Print ROBERT F. SHEM WELL | 10206 Ridgview Rd Liberty MO 64068 Email: PATTYANN149@ATT.NEL |
| Sign <u></u> Print Rick Spurgeon | 12690 S Hallet St Olathe KS 66062 rspurgeon@olatheks.org |
| Sign <u>LUANN Ridgeway</u> Print LUANN Ridgeway | 19405 County Line Rd Smithville MO 64089 |
| Sign <u></u> Print LYNDELL BRENTON | Liberty, MO 64068 |
| Sign <u></u> Print EDWARD J. BUSCH | 9620 W. CLARKSBORO ebusch@acs-1.com |
| Sign <u></u> Print PAUL SCHNEEGASS | 9412 W CLARKSBORO lorischneegass@yahoo.com |
| Sign <u>Patricia A. Shemwell</u> Print PATRICIA A. Shemwell | 10206 Ridgview Rd Liberty MO 64068 |
| Sign <u></u> Print | 9505 CLARKSBORO DR W. DCOBLE@BUBUTZ.CO.COM |

NAMEADDRESS + Email

Sign Donny Barron
 Print DANNY BARRON Donny Barron Liberty @ Gmail
 1 Cert

Sign Chris Daniels
 Print Chris Daniels 9718 W Clarksboro Dr
Liberty MO, 64068 cdanielsame@aol.com

Sign Steve Calder
 Print Steve Calder 9825 Clarksboro Dr E
scalder@americanmidwestkc.com

Sign Andrea Busch
 Print Andrea Busch 9620 W. Clarksboro
abusch@liberty.k12.mo.us

Sign Gayle S Wood
 Print Gayle S Wood 9625 E Clarksboro Dr
gayleswood@gmail.com

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NAME**ADDRESS + Email**

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Sign Gracie Tackwater BTACKWATER@GENERALUSA.COM
Print Gracie Tackwater

Sign Penny Johnson penny.johnson45@yahoo.com
Print _____

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 12, 2013 TIME SENT:
SENT BY: Douglass F. Noland FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Terry M. Jarrett, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: 5 (Including Information Sheet)

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL BACK AS SOON
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Telephone: (816) 781-5055 - Ask For: Kathy S. Suddarth

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Terry M. Jarrett, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Terry.jarrett@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Jarrett:

I have previously contacted each of you regarding our objection to a high voltage transmission line being prepared by Ameren in Liberty, Clay County, Missouri. I, and a number of citizens, filed a complaint online as was suggested to us at the public meeting that we had last week, where the citizens were finally able to voice their opposition in public to this power line.

Enclosed is the response that I received from the Consumer Service Department of the Missouri Public Service in response to the complaint filed. We would take issue with the response.

1. The response from the Consumer Service Department indicates that Ameren is unable to deliver the requisite amount of power to its new customer's business site. From our information, we would question that because Ameren is already providing power to this site. There are lights on at the location, which you can see by driving by the LMV building at night. Our State Representative T.J. Berry said that the LMV plant was currently being supplied power through a cooperative line and could continue to do so for several years.
2. There are other numerous alternatives of which Ameren can obtain this power to this location, which it appears from the response, were never even addressed. The alternatives are:

March 12, 2013
Terry M. Jarrett, Commissioner
Page 2

- a. Taking the power from the Cooperative line, which is already there. We were told at the public meeting that the Cooperative line was able to provide power for several years.
 - b. Upgrading route along 69 Highway from the Mosby Ameren power station to the LMV Plant.
 - c. Acquiring power from KCP&L, which we have been told has sufficient power, right next to the LMV Plant.
3. It appears from the response that the Commission's order was issued based solely upon information that Ameren had supplied, not listening or considering these alternatives.
4. I guess our questions to this Commission from this response by the Consumer Service Department are:
 - a. Do citizens and property owners not have a right and an opportunity to voice some objection to a high voltage transmission line that goes across their property, or adjacent to their property? Does there not have to be some type of public notice and an opportunity to be heard?
 - b. Does Due Process require any input from the citizens and property owners who are vastly affected by this line to have notice and some right of hearing before a decision that affects their rights is made? Or can the Commission just consider all the evidence from Ameren and not hear what the landowners say?
5. It appears that the Consumer Service Department's response is based only on information that Ameren supplied.
6. We would also take exception in Paragraph 4 where it says no public comments were received prior to approval. The public, the property owners, the people of the subdivision who live right next to this, had no idea that this was even going on because we were never told.
7. It seems to us that CSR 240-3.105 provides that notice should be required.

**"4 CSR 240-3.105 Filing Requirements for Electric Utility
Applications for Certificates of Convenience and Necessity**

March 12, 2013
Terry M. Jarrett, Commissioner
Page 3

(1) In addition to the requirements of 4 CSR 240-2.060(1), applications by an electric utility for a certificate of convenience and necessity shall include:

(A) If the application is for a service area—

1. A statement as to the same or similar utility service, regulated and nonregulated, available in the area requested;

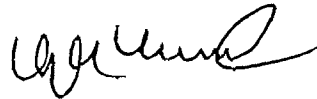
2. If there are ten (10) or more residents or landowners, the name and address of no fewer than ten (10) persons residing in the proposed service area or of no fewer than ten (10) landowners in the event there are no residences in the area, or, if there are fewer than ten (10) residents or landowners, the name and address of all residents and landowners;"

No property owner or affected citizen was provided such notice and such is not in the application filed by Ameren. If, as the Consumer Service response is, that this is for a service line, it is a line that is not in Ameren's territory. It appears that they had to go into KCP&L area to run this line. So, would not that be a service outside their area that notice to 10 landowners would be required? And are not the citizens of the Clarksboro/Windsor Estates subdivision who are in KCP&L territory affected?

8. It seems from the Consumer Service response that the Public Service Commission's approval of the certificate of necessity was based only on information provided by Ameren. No opportunity for the public to provide their side or for the alternatives to building the power line addressed. No citizens had any notice or right to provide any input in the Public Service Commission's findings.

Thank you for your continued consideration.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

doug

From: PSC Info (Public Info Email Address) - PSC [pscinfo@psc.mo.gov]
Sent: Tuesday, March 12, 2013 12:31 PM
To: 'doug@nolandlawfirm.com'
Subject: RE: Public Service Commission - Complaint Form

Dear Mr. Noland,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your comments regarding Ameren Missouri and the construction of a high voltage transmission line in Clay County. Your comments have been filed into the official case file of the Missouri Public Service Commission. The official case file number is EA-2013-0316.

On November 29, 2012, Ameren Missouri filed an application with the Missouri Public Service Commission ("Commission") for a Certificate of Convenience and Necessity to construct, install, own, operate, control, manage and maintain an electric sub-transmission line to provide electric service in Clay County, Missouri, for a new customer locating to Ameren Missouri's existing territory.

Commission rules on Certificates of Convenience and Necessity (CCNs) (4 CSR 240-3.105) have two distinct parts: Service Areas vs. line certificates. The utility would have been required to provide the name and addresses of the affected property owners if it was a request for new service territory. However, the request to extend the transmission line in Clay County in GA-2013-0316 was a request for a line certificate and Ameren Missouri was granted no new service area.

On December 17, 2012, the PSC Staff filed a recommendation advising the Commission to approve the application. In its recommendation, the PSC Staff stated that the new electric sub-transmission line is necessary because Ameren Missouri is currently unable to deliver the requisite amount of power to its new customer's business site.

On January 3, 2013 the Missouri Public Service Commission approved an application filed by Ameren Missouri seeking Commission authority to install, own and operate an electric sub-transmission line in Clay County near Liberty, Missouri. According to the application, the proposed line would provide electric service for a new customer locating to Ameren Missouri's existing territory. This line extension is to provide necessary power to the LMV automotive plant that will employ approximately 150 workers. The Commission approved the extension of 899 feet. Ameren did not have to get permission to build the majority of the line because it is in its own service territory. The Commission was only involved because one small piece of it went into the service territory of another IOU (KCP&L GMO). No public comments were received prior to the approval. Kansas City Power & Light Greater Missouri Operations did not oppose the Application.

If you have further questions regarding this case or any additional comments please contact our office at 1-800-392-4211. Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office.

Sincerely,

Consumer Service Department
Missouri Public Service Commission

From: EFIS Messenger
Sent: Friday, March 08, 2013 4:16 PM
To: Consumer Services
Subject: Public Service Commission - Complaint Form

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 11, 2013 TIME SENT:
SENT BY: Douglass F. Noland FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Stephen M. Stoll, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: 3 (Including Information Sheet)

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 11, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

This letter is on behalf of Robert and Anna Noland who are 89 and 90 years of age and own 170-acre farm in Liberty, Clay County, Missouri. Ameren is attempting to construct a high voltage transmission line across their property and has threatened eminent domain. The attempted line runs from a new plant construction, the LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months they have voiced their objection to this power line to their Representatives and State Senator to no avail. The County Commissioner had led us to believe that power to the LMV Plant was going to be supplied by Kansas City Power & Light, and that the power line would not be built. Then we learned that Ameren had filed something with the Public Service Commission for this power line and we were never notified of that, nor to our knowledge no other person affected by this power line, including our neighbors and those people that live in the Clarksboro/Windsor Estates subdivision were not notified as well. There has never been a public meeting until just last week when the property owners and concerned citizens got together themselves to voice their objection to this power line in a public place.

There are alternatives available to Ameren building this proposed power line.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

March 11, 2013
Stephen M. Stoll, Commissioner
Page 2

- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant. This would go down 69 Highway on existing right of way.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

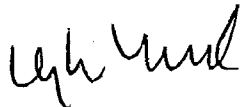
All of these alternatives would not require a new high voltage power line to be constructed through our property and our neighbors' properties. The alternatives would be less intrusive to us and all property owners in the area, and cause less interference to all of our property, and not interfere with our health and safety.

We are farmers and continue to operate a cow/calf operation on this 170-acre farm. There is already one power line across the property which is a cooperative line that has been there since we bought the property, over 35 years ago. Ameren's attempt to build another power line, and they want to run it parallel to the existing power line, would amount to an eight-lane interstate highway going through the middle of our property. It is the same with our neighbors to the west, Tom Tarwater and Carolyn Noland, and to the east, Robert Shemwell. It seems unfair that Ameren can attempt to build this power line when there are other alternatives available without going through our property and our neighbors' properties. This will have a significant and devastating effect on our property rights and future development.

Can Ameren's attempt at eminent domain be suspended until all of the alternatives are considered and our voice and objection are heard?

Thank you for your consideration in this matter.

Sincerely,



Douglass F. Noland
On Behalf of Robert and Anna Noland

DFN:kss

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 8, 2013 TIME SENT:
SENT BY: Douglass F. Noland FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Stephen M. Stoll, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: (Including Information Sheet)

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

This letter is written on behalf of many property owners and citizens who are adversely affected by an attempt by Ameren to construct a high voltage transmission line in Clay County, Missouri. The attempted line runs from a new construction, LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months the property owners and citizens have been voicing their objection to this power line to their Representatives and State Senator to no avail. We later found out that this Commission had provided some permission, authority or necessity, however it is phrased, to Ameren for this line. There was no property owner, no concerned citizen that was affected by this that was aware of this action. There was no public meeting held on this until the property owners and concerned citizens themselves organized a public meeting last night in Liberty, Missouri, to voice their unified objections to this power line.

There are alternatives available to Ameren's proposed power line that would not interfere with the property owners' property rights and concerns for their health and safety.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

March 8, 2013
Stephen M. Stoll, Commissioner
Page 2


- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

All of these alternatives would not require a new high voltage power line to be constructed. The alternatives would be less intrusive to all property owners in the area, and cause less interference to their property, and not interfere with their health and safety.

It was stated to several of us through the County Commissioner in Clay County that Kansas City Power and Light would be supplying to this facility. That position is apparently not correct as Ameren is threatening eminent domain on all of the affected property owners. I am enclosing with this letter copies of letters that we have sent to our Representatives in the past, as well as two Petitions that have been signed by a number of property owners and affected citizens by this power line. Because we have been told that voicing an objection to you as Commissioners of the Public Service Commission is an appropriate remedy that property owners and affected citizens have in this, and we would seek your consideration and also ask that if any attempts at condemnation by Ameren could be delayed until all of the viable alternatives that the public citizens and property owners have put forth on this matter be considered.

Thank you for your attention.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

cc: Betty Miller
Glenn Miller
Kenneth R. Wright
Scott Morron
Chris Daniels

March 8, 2013
Stephen M. Stoll, Commissioner
Page 3

Barbara Schmitt
James R. Schmitt
Craig Johnson
Julie R. Johnson
Gary L. Osten
Robert Shemwell
Rick Spurgeon
Luann Ridgeway
Lyndell Brenton
Edward J. Busch
Paul Schneegass
Patricia A. Shemwell
Danny Barron
Chris Daniels
Steve Calder
Andrea Busch
Gayle S. Wood
Bonnie Tarwater
Penny Johnson
Ryan Silvey
T.J. Berry
Pam Mason
Luann Ridgeway

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-751-5562

Lewis R. Mills, Esq.
Public Counsel
Missouri Office of the Public Counsel
Governor Office Building, Suite 650
200 Madison Street
P.O. Box 2230
Jefferson City, MO 65102-2230
Email: lewis.mills@ded.mo.gov

Re: Ameren

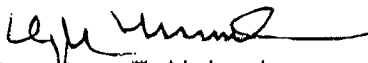
Dear Mr. Mills:

On behalf of property owners and a number of citizens who are adversely affected, this is some information that has been generated regarding an attempt by Ameren to construct a high voltage transmission line from the LMV Plant in Liberty, Missouri, to the Clarksboro/Windsor Estates subdivision. This is all in Clay County, Missouri.

At a public meeting last night, a number of people voiced their objection to this proposed line. I am enclosing a Petition signed by a number of people voicing their objections. We have a transcript being prepared of the meeting that when is available, it will be supplied to you. I am also enclosing some correspondence that has been made to some of our Representatives and State Senators in the past without any progress. None of the citizens or property owners were aware of any proceeding commenced before the Public Service Commission by Ameren for the construction of this line in its attempt to gain a certificate of necessity. If we had known, we would have made our voice and objection known at that time. Ameren has threatened eminent domain proceedings and we would request any postponement of that until any of these complaints filed by the numerous citizens and property owners to be addressed by the Public Service Commission, if that is a remedy that the property owners and public citizens have a right to.

Thank you.

Sincerely,


Douglass F. Noland

DFN:kss
Enclosures

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

October 30, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

This letter is to voice an objection to the installation of a 69kV electrical line proposed by Ameren electrical company running from the LMV Automotive Systems plant (Magna) on 69 Highway east to near the Clarksboro and H Highway junction. The proposed line which passes over 7 property owners is a significant impairment of the property rights of all of the property owners.

The property owners include land belonging to my wife, Carolyn Noland, which is a family farm that has been in her family for three generations; land belonging to my father, Robert Noland, who has owned and operated a family farm for nearly forty years; Tom and Bonita Tarwater, who live on the property that has been in their family for two generations; and Dr. Robert Shemwell and Rick Spurgeon who have both owned their property for over 25 years with the plan for future development.

There are a number of people that live adjacent to the proposed line and a number of residents who live off of Clarksboro Avenue near H Highway that, even though the line is not directly on their property, object to its placement and location.

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Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 2

The significance of the proposed line, a 69,000 volt power line with a proposed 50 foot easement to run parallel to an existing 100 foot easement that has been in existence for over 50 years, is a substantial impairment and interferes with the property rights of all of the people affected by this line. It significantly effects the future development plans and usage of the property. The future use of this land for housing or any commercial development is greatly effected. No one wants to live near a 69,000 volt power line or build a house next to it, with the health concerns that exist on such lines, or use it for any commercial property interest.

The line as proposed would also amount to a tandem easement with parallel electrical lines and poles that significantly restrict the use and value of the property and its aesthetic appearance. Dual power lines and dual poles are so obtrusive and offensive that they are almost non-existent in any other location. This dual usage would make the property undesirable and restrict any future development or use for housing or any other commercial use on property that at some point would have to be considered prime development area within the city limits of Liberty and the county. Three of the land owners are within Liberty, and the others are within the county. Future use of the property for single family housing would be virtually impossible due to the proposed line and its location, and any other future commercial development would also be effected.

It appears to me, as well as the other property owners, that there are other alternatives that could be considered and utilized.

1. Use of the existing right of way down H Highway and B Highway that already belongs to Ameren and along 69 Highway that is already serviced by an electrical easement;
2. Obtaining the power through an alternative source rather than the proposed site at or near the Clarksboro and H Highway junction;
3. A easement alongside the railroad that runs north and south, parallel to the Magna building;
4. Power could be obtained through KCP&L or another provider that may have sufficient power in the location of the Magna plant without having to run new lines;
5. Along 69 Highway using the existing easement; or
6. Power by my understanding is already supplied by Ameren to one of the other buildings in the Heartland Meadows industrial park near the Magna plant. If power is already supplied to that location, could the source not be upgraded and used for the Magna plant? Why does Ameren need to run such an obtrusive and detrimental line to get to the Magna plant?

October 30, 2012
Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 3

The property rights of individuals and operator of family farms, their future use and development rights and all of the benefits of their property should not be sacrificed by the interest of one utility company and their desire to sell power to one other business. Property owners should have rights and their interests in their property should be protected. Their use and future development interests are just as important as the wishes of one utility company, particularly when other alternative sites, locations and power sources are available that would be less intrusive and objectionable to any landowner and would, in all likelihood, be more economical and practical to accomplish.

Thank you for your assistance in this matter.

Sincerely,



Douglass F. Noland

DFN:rw

cc: Rep. T.J. Berry via first-class mail
Rep. Myron Neth via first-class mail

Governor Jay Nixon

November 25, 2012

Representative T.J. Berry

Representative Myron Neth

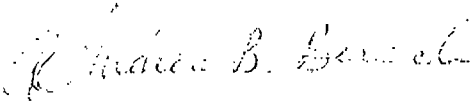
Clay County Eastern Commissioner Luann Ridgeway

Doug Noland, Noland Law Firm, LLC

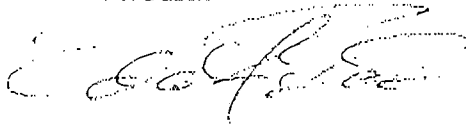
The enclosed petition is a response from the residents of Windsor Estates in Clay County Missouri. The residents of East and West Clarksboro stand together to oppose the construction, installation and placement of a 69kV electric line by Ameren Electric. We feel the placement of this line would be unsightly, unsafe and decrease property values in our neighborhood. We feel other solutions need to be reviewed and approved by all involved. Thank you for taking the time to review this statement and noting the concerns of the homeowners listed in the pages of the petition.

Residents of 9620 W. Clarksboro, Liberty, Missouri:

Andrea B. Busch



Edward J. Busch



PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|------------------------|------------------------------|
| Sign | <u>Andrew B. Busch</u> | <u>9620 W Clarksboro</u> |
| Print | <u>Andrew Busch</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>Edward J. Busch</u> | <u>9620 W. CLARKSBORO</u> |
| Print | <u>EDWARD J. BUSCH</u> | <u>Liberty, MO 64068</u> |
| Sign | <u>James Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print | <u>JAMES FRYER</u> | <u>LIBERTY, MO. 64068</u> |
| Sign | <u>Billie Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print | <u>BILLIE FRYER</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Paul Schneekase</u> | <u>9412 W CLARKSBORO</u> |
| Print | <u>PAUL SCHNEEKASE</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Lori Schneekase</u> | <u>9412 W CLARKSBORO DR</u> |
| Print | <u>LORI SCHNEEKASE</u> | <u>LIBERTY MO 64068</u> |
| Sign | <u>Judi Coble</u> | <u>9505 W. CLARKSBORO DR</u> |
| Print | <u>JUDI COBLE</u> | <u>LIBERTY, MO 64068</u> |
| Sign | <u>Cheryl Morrow</u> | <u>9518 W. Clarksboro</u> |
| Print | <u>Cheryl Morrow</u> | <u>Liberty, MO 64068</u> |

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| <u>NAME</u> | | <u>ADDRESS</u> |
|-------------|-----------------------|------------------------------------|
| Sign | <u>[Signature]</u> | <u>9823 CLARKSBORO W 64068</u> |
| Print | <u>THOMAS LEVANS</u> | <u>LIBERTY MO.</u> |
| Sign | <u>[Signature]</u> | <u>9823 CLARKSBORO W.</u> |
| Print | <u>ROBIN L. EVANS</u> | <u>LIBERTY MO. 64068</u> |
| Sign | <u>[Signature]</u> | <u>9816 CLARKSBORO DR. W 64068</u> |
| Print | <u>GLENN MILLER</u> | <u>LIBERTY MO</u> |
| Sign | <u>[Signature]</u> | <u>SAME</u> |
| Print | <u>BETTY MILLER</u> | |
| Sign | | |
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PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|--------------------|--------------------------|
| Sign | Brenda K McCarish | 9720 E Clarksboro Dr |
| Print | Brenda K McCarish | Liberty MO 64068 |
| Sign | R L McCarish | 9720 E CLARKSBORO |
| Print | R L. McCARISH | LIBERTY MO. 64068 |
| Sign | Penny Johnson | 9713 E CLARKSBORO |
| Print | PENNY JOHNSON | LIBERTY MO 64068 |
| Sign | Jack Johnson | 9713 E CLARKSBORO |
| Print | JACK JOHNSON | LIBERTY MO 64068 |
| Sign | Phyllis Stange | 9521 E. Clarksboro Drive |
| Print | Phyllis Stange | Liberty, MO 64068 |
| Sign | Ellen R. R. R. | 9713 E Clarksboro Dr |
| Print | Ellen R. R. R. | Liberty MO 64068 |
| Sign | Sandra Hemminger | 17404 H Highway |
| Print | Sandra Hemminger | Liberty, MO 64068 |
| Sign | James M. Hemminger | 17404 H Highway |
| Print | JAMES M. Hemminger | Liberty, MO 64068 |

NAMEADDRESS

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7663 West Clarksboro Dr.
Liberty, MO 64068

7663 West Clarksboro Dr.
Liberty, MO 64068

9625 E Clarksboro Dr.
Liberty, MO 64068

7663 West Clarksboro Dr.
Liberty, MO 64068

7663 West Clarksboro Dr.
Liberty, MO 64068

9518 W. Clarksboro Dr.
Liberty, MO 64068

9413 W. CLARKSBORO DR
Liberty, MO 64068

9413 W. CLARKSBORO DR
Liberty, MO 64068

9518 W. Clarksboro Dr.
Liberty, MO 64068

9625 E Clarksboro Dr.
Liberty, MO 64068

| NAME | ADDRESS |
|--|--|
| Sign <u>[Signature]</u> Print <u>Georgia Daniels</u> | <u>9718 W. CLARKSBORO</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Chris Daniels</u> | <u>9718 W. CLARKSBORO</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>GAIL ROBERTS</u> | <u>9721 W. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Robert L Roberts</u> | <u>9721 W. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Brian L Oster</u> | <u>9809 W. CLARKSBORO DR</u> <u>Liberty MO 64064</u> |
| Sign <u>[Signature]</u> Print <u>Lynn & Dick Wright</u> | <u>9904 W. CLARKSBORO</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Larry Phillips</u> | <u>9822 E. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Marla Heppner</u> | <u>9903 E. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Joseph D. Leonard</u> | <u>9813 E. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |
| Sign <u>[Signature]</u> Print <u>Julie R. Johnson</u> | <u>9723 E. CLARKSBORO DR</u> <u>Liberty, MO 64068</u> |

NAMEADDRESS

Sign

Print

17405 NE 97th St.

Liberty, MO 64068

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17405 NE 97th St.

Liberty, MO 64068

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

November 28, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

Enclosed please find a letter I received from Andrea and Edward Bush along with a Petition signed by all of the residents of Windsor Estates in Clay County where Ameren has proposed the installation of a 69kV electrical line.

Thank you again for your attention in this matter.

Sincerely,


Douglass F. Noland

DFN:rw
Enclosure

PETITION

WE, the undersigned, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri. Signed and dated this 7th day of March, 2013.

| <u>NAME</u> | <u>ADDRESS - Email</u> |
|--|---|
| Sign <u>Betty Miller</u> Print <u>BETTY MILLER</u> | <u>9816 CLARKSBORO DR W LIBERTY MO</u> <u>craftygal3@AOL.COM 816.218.5543</u> <u>(cell)</u> |
| Sign <u>[Signature]</u> Print <u>GLORIA MILLER</u> | <u>" JANE ↑</u> <u>816.392.9919 (cell)</u> |
| <u>WRIGHTFOOT@G.MAIL.COM</u> Sign <u>[Signature]</u> Print <u>Kenneth R Wright</u> | <u>9904 Clarksboro Dr. W.</u> <u>Liberty, MO</u> |
| Sign <u>[Signature]</u> Print <u>Scott Mowen</u> | <u>9518 W Clarksboro Dr</u> <u>Liberty MO 64068</u> <u>@gmail.com</u> |
| Sign <u>[Signature]</u> Print <u>Chris Daniels</u> | <u>9718 W Clarksboro Dr</u> <u>Liberty, MO 64068</u> |
| Sign <u>Barbara Schmitt</u> Print <u>Barbara Schmitt</u> | <u>9603 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> <u>bjs90@att.net</u> |
| Sign <u>[Signature]</u> Print <u>JAMES R. Schmitt</u> | <u>9603 W. Clarksboro Dr.</u> <u>Liberty, MO USA</u> |
| Sign <u>[Signature]</u> Print <u>Craig Johnson</u> | <u>9723 E Clarksboro Dr.</u> <u>Liberty MO 64068</u> <u>craig.johnson@hallmark.com</u> |

| NAME | ADDRESS + Email |
|--|--|
| Sign <u>[Signature]</u> Print Julie R. Johnson | 9723 E Clarksboro Dr. Liberty MO 64068 Julie@AgilityBranding.com |
| Sign <u>Gary Oster</u> Print gary.L.Oster@usps.gov | 9809 Clarksboro Dr Liberty MO 64068 |
| Sign <u>Robert P Shemwell</u> Print ROBERT P SHEMWEILL | 10206 Ridgview Rd Liberty Mo 64068 Email: PATTYANR149@ATT.NET |
| Sign <u>[Signature]</u> Print Rick Spurgeon | 12690 S Hallet St Olathe KS 66062 rspurgeon@olatheks.org |
| Sign <u>Luann Ridgeway</u> Print LUANN RIDGEWAY | 19405 County Line Rd Smithville MO 64089 |
| Sign <u>LYNDELL BRENTON</u> Print LYNDELL BRENTON | Liberty, Mo 64068 |
| Sign <u>[Signature]</u> Print EDWARD J. BUSCH | 9620 W. CLARKSBORO ebusch@acs-1.com |
| Sign <u>Paul Schneegass</u> Print PAUL SCHNEEGASS | 9412 W CLARKSBORO lorischneegass@yahoo.com |
| Sign <u>Patricia A Shemwell</u> Print PATRICIA A. SHEMWEILL | 10206 Ridgview Rd Liberty Mo 64068 |
| Sign <u>Donna Cible</u> Print | 9505 CLARKSBORO DRW. DCOBLE@BUBBITZ.CO.COM |

NAME

ADDRESS + Email

Sign Donny Barron
Print DANNY BARRON Donny Barron Liberty @ Gmail
1 Center

Sign Chris Daniels
Print Chris Daniels 9718 W Clarksboro dr
Liberty MO, 64068 Cdanielsame@cox.com

Sign Steve Calder
Print Steve Calder 9825 Clarksboro Dr E
scalder@americaenmidwest KC. com

Sign Andrea Busch
Print Andrea Busch 9620 W. Clarksboro
abusch@liberty. K12. mo. us

Sign Gayle S Wood
Print Gayle S Wood 9625 E Clarksboro Dr
gayleswood@gmail.com

Sign _____
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NAME**ADDRESS + Email**

Sign

Immi Tarnator bTARNATOR@GENERALUSA.COM

Print

Bernie TARNATOR

Sign

Penny Johnson

Print

penny.johnson45@yahoo.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

TELECOPIER INFORMATION SHEET

DATE: March 12, 2013 TIME SENT:
SENT BY: Douglass F. Noland FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Stephen M. Stoll, Commissioner
Firm Name: Missouri Public Service Commission
City, State: Jefferson City, MO
Fax No.: 573-526-7341

Total Number of Pages: 5 (Including Information Sheet)

IF YOU DO NOT RECEIVE ALL OF THE PAGES, PLEASE CALL BACK AS SOON
AS POSSIBLE!

Telephone: (816) 781-5055 - Ask For: Kathy S. Suddarth

We are transmitting from a Toshiba Super G3.

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TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL
SERVICE. THANK YOU.

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

I have previously contacted each of you regarding our objection to a high voltage transmission line being prepared by Ameren in Liberty, Clay County, Missouri. I, and a number of citizens, filed a complaint online as was suggested to us at the public meeting that we had last week, where the citizens were finally able to voice their opposition in public to this power line.

Enclosed is the response that I received from the Consumer Service Department of the Missouri Public Service in response to the complaint filed. We would take issue with the response.

1. The response from the Consumer Service Department indicates that Ameren is unable to deliver the requisite amount of power to its new customer's business site. From our information, we would question that because Ameren is already providing power to this site. There are lights on at the location, which you can see by driving by the LMV building at night. Our State Representative T.J. Berry said that the LMV plant was currently being supplied power through a cooperative line and could continue to do so for several years.
2. There are other numerous alternatives of which Ameren can obtain this power to this location, which it appears from the response, were never even addressed. The alternatives are:

March 12, 2013
Stephen M. Stoll, Commissioner
Page 2

- a. Taking the power from the Cooperative line, which is already there. We were told at the public meeting that the Cooperative line was able to provide power for several years.
 - b. Upgrading route along 69 Highway from the Mosby Ameren power station to the LMV Plant.
 - c. Acquiring power from KCP&L, which we have been told has sufficient power, right next to the LMV Plant.
3. It appears from the response that the Commission's order was issued based solely upon information that Ameren had supplied, not listening or considering these alternatives.
4. I guess our questions to this Commission from this response by the Consumer Service Department are:
 - a. Do citizens and property owners not have a right and an opportunity to voice some objection to a high voltage transmission line that goes across their property, or adjacent to their property? Does there not have to be some type of public notice and an opportunity to be heard?
 - b. Does Due Process require any input from the citizens and property owners who are vastly affected by this line to have notice and some right of hearing before a decision that affects their rights is made? Or can the Commission just consider all the evidence from Ameren and not hear what the landowners say?
5. It appears that the Consumer Service Department's response is based only on information that Ameren supplied.
6. We would also take exception in Paragraph 4 where it says no public comments were received prior to approval. The public, the property owners, the people of the subdivision who live right next to this, had no idea that this was even going on because we were never told.
7. It seems to us that CSR 240-3.105 provides that notice should be required.

**"4 CSR 240-3.105 Filing Requirements for Electric Utility
Applications for Certificates of Convenience and Necessity**

March 12, 2013
Stephen M. Stoll, Commissioner
Page 3

(1) In addition to the requirements of 4 CSR 240-2.060(1), applications by an electric utility for a certificate of convenience and necessity shall include:

(A) If the application is for a service area—

1. A statement as to the same or similar utility service, regulated and nonregulated, available in the area requested;

2. If there are ten (10) or more residents or landowners, the name and address of no fewer than ten (10) persons residing in the proposed service area or of no fewer than ten (10) landowners in the event there are no residences in the area, or, if there are fewer than ten (10) residents or landowners, the name and address of all residents and landowners;"

No property owner or affected citizen was provided such notice and such is not in the application filed by Ameren. If, as the Consumer Service response is, that this is for a service line, it is a line that is not in Ameren's territory. It appears that they had to go into KCP&L area to run this line. So, would not that be a service outside their area that notice to 10 landowners would be required? And are not the citizens of the Clarksboro/Windsor Estates subdivision who are in KCP&L territory affected?

8. It seems from the Consumer Service response that the Public Service Commission's approval of the certificate of necessity was based only on information provided by Ameren. No opportunity for the public to provide their side or for the alternatives to building the power line addressed. No citizens had any notice or right to provide any input in the Public Service Commission's findings.

Thank you for your continued consideration.

Sincerely,



Douglass F. Noland

DFN:kss
Enclosures

doug

From: PSC Info (Public Info Email Address) - PSC [pscinfo@psc.mo.gov]
Sent: Tuesday, March 12, 2013 12:31 PM
To: 'doug@nolandlawfirm.com'
Subject: RE: Public Service Commission - Complaint Form

Dear Mr. Noland,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your comments regarding Ameren Missouri and the construction of a high voltage transmission line in Clay County. Your comments have been filed into the official case file of the Missouri Public Service Commission. The official case file number is EA-2013-0316.

On November 29, 2012, Ameren Missouri filed an application with the Missouri Public Service Commission ("Commission") for a Certificate of Convenience and Necessity to construct, install, own, operate, control, manage and maintain an electric sub-transmission line to provide electric service in Clay County, Missouri, for a new customer locating to Ameren Missouri's existing territory.

Commission rules on Certificates of Convenience and Necessity (CCNs) (4 CSR 240-3.105) have two distinct parts: Service Areas vs. line certificates. The utility would have been required to provide the name and addresses of the affected property owners if it was a request for new service territory. However, the request to extend the transmission line in Clay County in GA-2013-0316 was a request for a line certificate and Ameren Missouri was granted no new service area.

On December 17, 2012, the PSC Staff filed a recommendation advising the Commission to approve the application. In its recommendation, the PSC Staff stated that the new electric sub-transmission line is necessary because Ameren Missouri is currently unable to deliver the requisite amount of power to its new customer's business site.

On January 3, 2013 the Missouri Public Service Commission approved an application filed by Ameren Missouri seeking Commission authority to install, own and operate an electric sub-transmission line in Clay County near Liberty, Missouri. According to the application, the proposed line would provide electric service for a new customer locating to Ameren Missouri's existing territory. This line extension is to provide necessary power to the LMV automotive plant that will employ approximately 150 workers. The Commission approved the extension of 899 feet. Ameren did not have to get permission to build the majority of the line because it is in its own service territory. The Commission was only involved because one small piece of it went into the service territory of another IOU (KCP&L GMO). No public comments were received prior to the approval. Kansas City Power & Light Greater Missouri Operations did not oppose the Application.

If you have further questions regarding this case or any additional comments please contact our office at 1-800-392-4211. Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office.

Sincerely,

Consumer Service Department
Missouri Public Service Commission

From: EFIS Messenger
Sent: Friday, March 08, 2013 4:16 PM
To: Consumer Services
Subject: Public Service Commission - Complaint Form

N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
noland.ca@gmail.com

TELECOPIER INFORMATION SHEET

DATE: March 12, 2013

SENT BY: Carolyn A. Noland

FROM FAX NO. (816) 781-5216

THE FOLLOWING PAGES ARE FOR:

Name of Individual: Stephen M. Stoll, Commissioner
Firm Name: Missouri Public Service Commission
Fax No.: 573-526-7341

Total Number of Pages: 3 (Including Information Sheet)

THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS CONFIDENTIAL INFORMATION INTENDED ONLY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE TO DELIVER IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, OR COPYING OF THIS COMMUNICATION IS STRICTLY PROHIBITED. IF YOU HAVE RECEIVED THIS COMMUNICATION IN ERROR, PLEASE IMMEDIATELY NOTIFY US BY TELEPHONE, AND RETURN THE ORIGINAL MESSAGE TO US AT THE ABOVE ADDRESS VIA THE U.S. POSTAL SERVICE. THANK YOU.

N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
816-781-6898
noland.ca@gmail.com

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

RE: Official Case File No. EA20130316

Dear Commissioner Stoll:

I am writing in response to an email I received from "Customer Service Department Public Service Commission" on March 12, 2013, in response to a complaint I filed regarding Ameren's attempt to build a 69kV transmission line across my property. While I appreciate the Public Service Commission's (PSC) prompt response to my complaint, I felt it was lacking in several respects. The PSC provided no explanation as to why there were no public comments received prior to their January 3, 2013, approval of the application filed by Ameren seeking authority to build this new 69kV line. The PSC received no input nor did it seek any input from those residents and landowners who will be tremendously affected by the construction of this new line. I do not believe the process followed by the PSC and approval of Ameren's application was fair and was such that those who would be affected by this were not able to voice their thoughts and concerns regarding Ameren's plans. In addition, I do not believe the PSC followed its own rules because the residents or landowners who are affected by the PSC's January 3, 2013, approval were never contacted, despite the fact that there is a requirement to do so, according to your own rules. I also do not believe that the information that the PSC relied upon to make its determination is accurate. Your email states that the PSC staff found that the new electrical subtransmission line is necessary because Ameren is currently unable to deliver power to the LMV Plant. However, it is common knowledge for those who live near the LMV Plant that it currently is receiving power from an existing 69,000 volt line that is already in place. And Ameren is also able to deliver power to the Plant by any of the alternatives that I have listed in my complaint if anyone at the PSC would be willing to read and consider those in its review of the application.

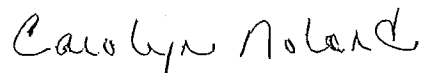
March 12, 2013
Stephen M. Stoll, Commissioner
Page 2

I would simply ask that the PSC take the thoughts and suggestions of these alternative routes from these many residents and landowners before making its decision. I simply do not understand how in the PSC's mission to represent all Missourians and how the landowners affected by this proposed power line would have been completely and totally ignored and not informed and then completely ignored after being informed.

Again, I would ask that the PSC reconsider its approval of Ameren's application and reverse its decision and seek the input of someone other than Ameren, who is an advocate for the line, and coming to factual determinations as to how best to deliver power to the LMV Plant so as to be fair to all of the parties involved in the matter and not just rely upon statements of fact by Ameren.

I would appreciate your prompt response in this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn A. Noland".

Carolyn A. Noland

Eiken, Shelley

From: Scott Morrow [Scott.Morrow@LRA-INC.com]
Sent: Friday, March 08, 2013 2:05 PM
To: Stoll, Steve
Subject: regarding Ameren's attempt to build a high voltage transmission line from the LMV Plant in Liberty to the Windsor Estate subdivision

Dear Mr. Stoll,

I want to express my concerns for Ameren's attempt to build a high voltage transmission line from the LMV Plant in Liberty to the Windsor Estate subdivision.

I live at 9518 West Clarksboro Drive and the proposed power line would basically be in my back yard. (the length of my property)

While I understand the need for more jobs in Missouri and the new plant will provide additional funds to Missouri and the power companies, I want you to place yourself in our shoes.

We moved to the country 19 years ago, are raising our children, whom play in our large lots, fly kites, we fly model airplanes, as well as enjoy being outdoors as a family. We moved here to get away from the city and everything that goes along with living in the city.

The proposed power lines will dramatically reduce our property values and there are proven health risks with living near high voltage lines.

There are several alternatives to placing the new transmission line and affecting many landowners in Liberty and in rural Clay County.

1. Reclassifying the territory to allow KCP&L to supply power to the LMV plant.
2. Require Ameren to obtain power from its Mosby power station on 69 highway using the exiting power poles.
3. Require Ameren and the Cooperative continue to work together to allow Ameren to use power from the existing Cooperative line.
4. Encourage KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L that already has power near the LMV Plant.

Please consider them and please work towards a safer and practical solution.

Thank you for your time,

Scott Morrow
9518 West Clarksboro Drive
Liberty, MO 64068

816-769-0149

Eiken, Shelley

From: Doug Noland [doug@nolandlawfirm.com]
Sent: Friday, March 08, 2013 4:06 PM
To: Stoll, Steve
Subject: Ameren Power Line
Attachments: Letter to Commissioner Stephen M. Stoll.pdf; Documents regarding Ameren Power Line.pdf

Dear Commissioner Stoll:

Please see the attached letter and documents regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

This letter is written on behalf of many property owners and citizens who are adversely affected by an attempt by Ameren to construct a high voltage transmission line in Clay County, Missouri. The attempted line runs from a new construction, LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months the property owners and citizens have been voicing their objection to this power line to their Representatives and State Senator to no avail. We later found out that this Commission had provided some permission, authority or necessity, however it is phrased, to Ameren for this line. There was no property owner, no concerned citizen that was affected by this that was aware of this action. There was no public meeting held on this until the property owners and concerned citizens themselves organized a public meeting last night in Liberty, Missouri, to voice their unified objections to this power line.

There are alternatives available to Ameren's proposed power line that would not interfere with the property owners' property rights and concerns for their health and safety.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

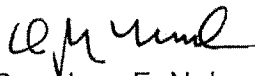
- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

All of these alternatives would not require a new high voltage power line to be constructed. The alternatives would be less intrusive to all property owners in the area, and cause less interference to their property, and not interfere with their health and safety.

It was stated to several of us through the County Commissioner in Clay County that Kansas City Power and Light would be supplying to this facility. That position is apparently not correct as Ameren is threatening eminent domain on all of the affected property owners. I am enclosing with this letter copies of letters that we have sent to our Representatives in the past, as well as two Petitions that have been signed by a number of property owners and affected citizens by this power line. Because we have been told that voicing an objection to you as Commissioners of the Public Service Commission is an appropriate remedy that property owners and affected citizens have in this, and we would seek your consideration and also ask that if any attempts at condemnation by Ameren could be delayed until all of the viable alternatives that the public citizens and property owners have put forth on this matter be considered.

Thank you for your attention.

Sincerely,


Douglass F. Noland

DFN:kss
Enclosures

cc: Betty Miller
Glenn Miller
Kenneth R. Wright
Scott Morron
Chris Daniels

March 8, 2013
Stephen M. Stoll, Commissioner
Page 3

Barbara Schmitt
James R. Schmitt
Craig Johnson
Julie R. Johnson
Gary L. Osten
Robert Shemwell
Rick Spurgeon
Luann Ridgeway
Lyndell Brenton
Edward J. Busch
Paul Schneegass
Patricia A. Shemwell
Danny Barron
Chris Daniels
Steve Calder
Andrea Busch
Gayle S. Wood
Bonnie Tarwater
Penny Johnson
Ryan Silvey
T.J. Berry
Pam Mason
Luann Ridgeway

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 8, 2013

SENT VIA EMAIL AND FAX NO. 573-751-5562

Lewis R. Mills, Esq.
Public Counsel
Missouri Office of the Public Counsel
Governor Office Building, Suite 650
200 Madison Street
P.O. Box 2230
Jefferson City, MO 65102-2230
Email: lewis.mills@ded.mo.gov

Re: Ameren

Dear Mr. Mills:

On behalf of property owners and a number of citizens who are adversely affected, this is some information that has been generated regarding an attempt by Ameren to construct a high voltage transmission line from the LMV Plant in Liberty, Missouri, to the Clarksboro/Windsor Estates subdivision. This is all in Clay County, Missouri.

At a public meeting last night, a number of people voiced their objection to this proposed line. I am enclosing a Petition signed by a number of people voicing their objections. We have a transcript being prepared of the meeting that when is available, it will be supplied to you. I am also enclosing some correspondence that has been made to some of our Representatives and State Senators in the past without any progress. None of the citizens or property owners were aware of any proceeding commenced before the Public Service Commission by Ameren for the construction of this line in its attempt to gain a certificate of necessity. If we had known, we would have made our voice and objection known at that time. Ameren has threatened eminent domain proceedings and we would request any postponement of that until any of these complaints filed by the numerous citizens and property owners to be addressed by the Public Service Commission, if that is a remedy that the property owners and public citizens have a right to.

Thank you.

Sincerely,


Douglass F. Noland

DFN:kss
Enclosures

NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

October 30, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

This letter is to voice an objection to the installation of a 69kV electrical line proposed by Ameren electrical company running from the LMV Automotive Systems plant (Magna) on 69 Highway east to near the Clarksboro and H Highway junction. The proposed line which passes over 7 property owners is a significant impairment of the property rights of all of the property owners.

The property owners include land belonging to my wife, Carolyn Noland, which is a family farm that has been in her family for three generations; land belonging to my father, Robert Noland, who has owned and operated a family farm for nearly forty years; Tom and Bonita Tarwater, who live on the property that has been in their family for two generations; and Dr. Robert Shemwell and Rick Spurgeon who have both owned their property for over 25 years with the plan for future development.

There are a number of people that live adjacent to the proposed line and a number of residents who live off of Clarksboro Avenue near H Highway that, even though the line is not directly on their property, object to its placement and location.

The significance of the proposed line, a 69,000 volt power line with a proposed 50 foot easement to run parallel to an existing 100 foot easement that has been in existence for over 50 years, is a substantial impairment and interferes with the property rights of all of the people affected by this line. It significantly effects the future development plans and usage of the property. The future use of this land for housing or any commercial development is greatly effected. No one wants to live near a 69,000 volt power line or build a house next to it, with the health concerns that exist on such lines, or use it for any commercial property interest.

The line as proposed would also amount to a tandem easement with parallel electrical lines and poles that significantly restrict the use and value of the property and its aesthetic appearance. Dual power lines and dual poles are so obtrusive and offensive that they are almost non-existent in any other location. This dual usage would make the property undesirable and restrict any future development or use for housing or any other commercial use on property that at some point would have to be considered prime development area within the city limits of Liberty and the county. Three of the land owners are within Liberty, and the others are within the county. Future use of the property for single family housing would be virtually impossible due to the proposed line and its location, and any other future commercial development would also be effected.

It appears to me, as well as the other property owners, that there are other alternatives that could be considered and utilized.

1. Use of the existing right of way down H Highway and B Highway that already belongs to Ameren and along 69 Highway that is already serviced by an electrical easement;
2. Obtaining the power through an alternative source rather than the proposed site at or near the Clarksboro and H Highway junction;
3. A easement alongside the railroad that runs north and south, parallel to the Magna building;
4. Power could be obtained through KCP&L or another provider that may have sufficient power in the location of the Magna plant without having to run new lines;
5. Along 69 Highway using the existing easement; or
6. Power by my understanding is already supplied by Ameren to one of the other buildings in the Heartland Meadows industrial park near the Magna plant. If power is already supplied to that location, could the source not be upgraded and used for the Magna plant? Why does Ameren need to run such an obtrusive and detrimental line to get to the Magna plant?

October 30, 2012
Rep. Myron Neth
Rep. T.J. Berry
Rep. Ryan Silvey
Page 3

The property rights of individuals and operator of family farms, their future use and development rights and all of the benefits of their property should not be sacrificed by the interest of one utility company and their desire to sell power to one other business. Property owners should have rights and their interests in their property should be protected. Their use and future development interests are just as important as the wishes of one utility company, particularly when other alternative sites, locations and power sources are available that would be less intrusive and objectionable to any landowner and would, in all likelihood, be more economical and practical to accomplish.

Thank you for your assistance in this matter.

Sincerely,


Douglass F. Noland

DFN:rw

cc: Rep. T.J. Berry via first-class mail
Rep. Myron Neth via first-class mail

Governor Jay Nixon

November 25, 2012

Representative T.J. Berry

Representative Myron Neth

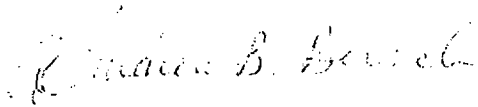
Clay County Eastern Commissioner Luann Ridgeway

Doug Noland, Noland Law Firm, LLC

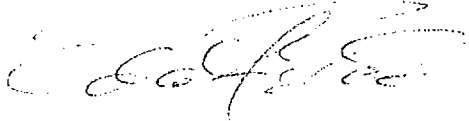
The enclosed petition is a response from the residents of Windsor Estates in Clay County Missouri. The residents of East and West Clarksboro stand together to oppose the construction, installation and placement of a 69kV electric line by Ameren Electric. We feel the placement of this line would be unsightly, unsafe and decrease property values in our neighborhood. We feel other solutions need to be reviewed and approved by all involved. Thank you for taking the time to review this statement and noting the concerns of the homeowners listed in the pages of the petition.

Residents of 9620 W. Clarksboro, Liberty, Missouri;

Andrea B. Busch

A handwritten signature in cursive script, appearing to read "Andrea B. Busch".

Edward J. Busch

A handwritten signature in cursive script, appearing to read "Edward J. Busch".

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| <u>NAME</u> | <u>ADDRESS</u> |
|------------------------------|------------------------------|
| Sign <u>Andrea B. Busch</u> | <u>9620 W Clarksboro</u> |
| Print <u>Andrea Busch</u> | <u>Liberty, MO 64068</u> |
| Sign <u>Edward J. Busch</u> | <u>9620 W. CLARKSBORO</u> |
| Print <u>EDWARD J. BUSCH</u> | <u>Liberty, MO 64068</u> |
| Sign <u>James Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print <u>JAMES FRYER</u> | <u>LIBERTY, MO. 64068</u> |
| Sign <u>Billie Fryer</u> | <u>9608 W CLARKSBORO DR</u> |
| Print <u>BILLIE FRYER</u> | <u>LIBERTY, MO 64068</u> |
| Sign <u>Paul Schneegas</u> | <u>9412 W CLARKSBORO</u> |
| Print <u>PAUL SCHNEEGAS</u> | <u>LIBERTY MO 64068</u> |
| Sign <u>Lori Schneegas</u> | <u>9412 W. CLARKSBORO DR</u> |
| Print <u>LORI SCHNEEGAS</u> | <u>LIBERTY MO 64068</u> |
| Sign <u>Judi Coble</u> | <u>9505 W. CLARKSBORO DR</u> |
| Print <u>JUDI COBLE</u> | <u>LIBERTY, MO 64068</u> |
| Sign <u>Cheryl Morrow</u> | <u>9518 W Clarksboro</u> |
| Print <u>Cheryl Morrow</u> | <u>Liberty, MO 64068</u> |

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69KV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

NAME

ADDRESS

Sign [Signature] 9823 CLARKSBORO W 64068
Print THOMAS L EVANS LIBERTY MO.

Sign [Signature] 9823 CLARKSBORO W.
Print RUBIN L. EVANS LIBERTY MO. 64068

Sign [Signature] 9816 CLARKSBORO DR. W 64068
Print GLENN MILLER LIBERTY, MO

Sign [Signature] SAME
Print BETTY MILLER

Sign _____
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Sign _____
Print _____

PETITION

WE, the undersigned residents of Clay County, Missouri, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri.

| | <u>NAME</u> | <u>ADDRESS</u> |
|-------|--------------------|--------------------------|
| Sign | Brenda K McClamish | 9720 E Clarksboro Dr |
| Print | Brenda K McClamish | Liberty MO 64068 |
| Sign | R L McClamish | 9720 E CLARKSBORO |
| Print | R L. McCLAMISH | LIBERTY MO. 64068 |
| Sign | Penny Johnson | 9713 E CLARKSBORO |
| Print | PENNY JOHNSON | LIBERTY MO 64068 |
| Sign | Jack Johnson | 9713 E CLARKSBORO |
| Print | Jack Johnson | LIBERTY MO 64068 |
| Sign | Phyllis Shoemaker | 9521 E. Clarksboro Drive |
| Print | Phyllis Shoemaker | Liberty, MO 64068 |
| Sign | Tim Bae | 9716 Clarksboro Dr |
| Print | Tim Bae | Liberty MO 64068 |
| Sign | Jordan Hemminger | 17401 H Highway |
| Print | Jordan Hemminger | Liberty, MO 64068 |
| Sign | James Hemminger | 17401 H Highway |
| Print | James Hemminger | Liberty, MO 64068 |

NAME**ADDRESS**

Sign Robert J. Schmitt
Print Robert J. Schmitt

9625 West Clarksburg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print JAMES R. Schmitt

9603 West Clarksburg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print James R. Schmitt

9603 West Clarksburg Dr.
Liberty, MO 64068

Sign James R. Schmitt
Print James R. Schmitt

9603 West Clarksburg Dr.
Liberty, MO 64068

Sign Mike Thompson
Print Mike Thompson

9603 West Clarksburg Dr.
Liberty, MO 64068

Sign Mike Thompson
Print Mike Thompson

9510 West Clarksburg Dr.
Liberty, MO 64068

Sign Linda Hoover
Print LINDA HOOPER

9413 W CLARKSBURG DR
Liberty, MO 64068

Sign George Hoover
Print George Hoover

9413 W CLARKSBURG DR
Liberty, MO 64068

Sign Scott Murray
Print Scott Murray

9510 W. Clarksburg Dr
Liberty, MO 64068

Sign George Weid
Print George Weid

9625 E Clarksburg Dr.
Liberty, MO 64068

NAMEADDRESS

Sign

Print

Georgia Daniels 4718 W. CLARKSBORO
Liberty, MO 64068

Sign

Print

Chris Daniels 4718 W. CLARKSBORO
Liberty, MO 64068

Sign

Print

GAIL ROBERTS 9721 CLARKSBORO DR
Liberty, MO 64068

Sign

Print

Robert L Roberts 9721 CLARKSBORO DR
Liberty, MO 64068

Sign

Print

Gary L Ostra 9809 W CLARKSBORO DR
Liberty MO 64064

Sign

Print

Lynn & Dick Wright 9909 W CLARKSBORO
Liberty, MO 64068

Sign

Print

Frank Phillips 4872 E. CLARKSBORO DR
Liberty, MO 64068

Sign

Print

Marla Leeper 4903 E CLARKSBORO DR
Liberty, MO 64068

Sign

Print

Joseph D Leemann 9813 E. CLARKSBORO DR
Liberty, MO 64068

Sign

Print

Julie R Johnson 4723 E CLARKSBORO DR
Liberty, MO 64068

NAME

ADDRESS

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17405 NE 97th St.

Liberty, MO 64068

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17405 NE 97th St

Liberty, MO 64068

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

November 28, 2012

SENT VIA EMAIL

Rep. Myron Neth
MO House of Representatives
201 West Capitol Avenue
Room 110A
Jefferson City, MO 65101
Email: Myron.Neth@house.mo.gov

Rep. T.J. Berry
MO House of Representative
201 West Capitol Avenue
Room 400CB
Jefferson City, MO 65101
Email: TJ.Berry@house.mo.gov

Rep. Ryan Silvey
MO House of Representatives
201 West Capitol Avenue
Room 306
Jefferson City, MO 65101
Email: Ryan.Silvey@house.mo.gov

Dear Representatives Neth, Berry and Silvey:

Enclosed please find a letter I received from Andrea and Edward Bush along with a Petition signed by all of the residents of Windsor Estates in Clay County where Ameren has proposed the installation of a 69kV electrical line.

Thank you again for your attention in this matter.

Sincerely,


Douglass F. Noland

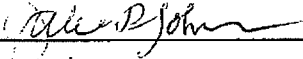
DFN:rw
Enclosure

PETITION

WE, the undersigned, object to the construction, installation and placement of a 69kV electric line by Ameren Electric in the area of Clarksboro Drive and H Highway in Clay County, Missouri. Signed and dated this 7th day of March, 2013.

| <u>NAME</u> | <u>ADDRESS - Email</u> |
|---|--|
| Sign <u>Betty Miller</u> Print <u>BETTY MILLER</u> | <u>9816 CLARKSBORO DR W LIBERTY MO</u> <u>craftygal3@aol.com 816.718.5543</u> <u>(202)</u> |
| Sign <u>Jan Miller</u> Print <u>JANIS MILLER</u> <u>WRIGHT FOODS @ G.MAIL.COM</u> | <u>" JANE ↑</u> <u>816.392.9919 (cell)</u> |
| Sign <u>Kenneth R Wright</u> Print <u>Kenneth R Wright</u> | <u>9904 CLARKSBORO DR. W.</u> <u>LIBERTY, MO.</u> |
| Sign <u>Scott Morrow</u> Print <u>Scott Morrow</u> | <u>9518 W Clarksboro Dr SMORROW6057</u> <u>Liberty MO 64068 @gmail.com</u> |
| Sign <u>Chris Daniels</u> Print <u>Chris Daniels</u> | <u>9718 W Clarksboro Dr</u> <u>Liberty, MO 64068</u> |
| Sign <u>Barbara Schmitt</u> Print <u>Barbara Schmitt</u> | <u>9603 W Clarksboro Dr.</u> <u>Liberty, MO 64068</u> <u>bjs90@att.net</u> |
| Sign <u>James R. Schmitt</u> Print <u>JAMES R. Schmitt</u> | <u>9603 W. Clarksboro Dr.</u> <u>Liberty, MO USA</u> |
| Sign <u>Craig Johnson</u> Print <u>Craig Johnson</u> | <u>9723 E Clarksboro Dr.</u> <u>Liberty Mo 64068</u> <u>craig.johnson@hallmark.com</u> |

NAME**ADDRESS + Email**

Sign 
Print Julie R. Johnson

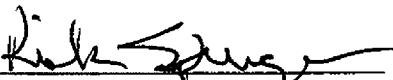
9723 E Clarksboro Dr.
Liberty MO 64068
Julie@AgilityBranding.com

Sign Gary Oster
Print Gary L. Oster gusps.gov

9809 Clarksboro dr
Liberty MO 64068

Sign Robert F. Shemwell
Print ROBERT F. SHEMWEILL

10206 Ridgview Rd
Liberty Mo 64068
Email PATTYANN149
@ATT.NET

Sign 
Print Rick Spurgeon


12690 S Hallet St
Olathe KS 66062
rspurgeon@olatheks.org

Sign LUANN Ridgeway
Print LUANN Ridgeway

19405 County Line Rd
Smithville MO 64089

Sign Lyndell Brenton
Print LYNDELL BRENTON

Liberty, Mo 64068

Sign 
Print EDWARD J. BUSCH

9620 W. CLARKSBORO
ebusch@acs-1.com

Sign Paul Schneegass
Print PAUL SCHNEEGASS

9412 W CLARKSBORO
lorischneegass@yahoo.com

Sign Patricia A. Shemwell
Print PATRICIA A. SHEMWEILL

10206 Ridgview Rd
Liberty Mo 64068

Sign Don Coble
Print Don Coble

9505 CLARKSBORO DR W.
DCOBLE@BUBBLITZ.CO.COM

NAME

ADDRESS + Email

Sign Donny Barron

Print DANNY BARRON Donny Barron Liberty @ Gmail
1 Corp

Sign Chris Daniels

Print Chris Daniels 9718 W Clarksboro Dr
Liberty MO, 64068 Cdanietlsamc@comcast.com

Sign Steve Calder

Print Steve Calder 9825 Clarksboro Dr E
Scalder @ americanmidwest KC. com

Sign Andrea Busch

Print Andrea Busch 9620 W. Clarksboro
abusch@liberty.k12.mo.us

Sign Gayle S. Wood

Print Gayle S. Wood 9625 E Clarksboro Dr
gayleswood@gmail.com

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NAME

ADDRESS + Email

Sign Bonnie Tarkenton BTARKWATER@GENERALUSA.COM
Print Bonnie Tarkenton

Sign Penny Johnson penny.johnson45@yahoo.com
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Eiken, Shelley

From: Carolyn Noland [noland.ca@gmail.com]
Sent: Sunday, March 10, 2013 7:24 PM
To: Stoll, Steve
Subject: Ameren Powerline - Clay Co

Dear Mr. Stoll

My name is Carolyn Noland and I would like to voice my objection regarding the Ameren powerline that is to be constructed for the benefit of the LMV Plant in Clay Co. I am the owner of a family farm that has been in my family for three generations and would like to voice my objection regarding the Ameren Line (a 69v transmission line) that is currently being proposed to provide power to the LMV Plant in Clay Co. There has been a powerline on the property since it has been owned by my family. Ameren is proposing to build an additional 69v transmission powerline with an additional easement to run parallel to the existing powerline. This will be similar to an 8 lane highway (the existing easement plus the additional easement) going thru the middle of my property which will cut it in half. I believe this will hurt the future development prospects of my property - as who would want to deal with a double utility easement in the middle of the property. We have voiced our objections over this powerline since we have learned of it to our State Representatives and our County Commissioner. We were lead to believe by our County Commissioner that KCP&L was going to provide the power. We just recently found out this was not the case and that Ameren had filed something with the Missouri Public Service regarding the construction of a powerline to provide power to the LMV plant. We were never notified by our State Representatives Myron Neth and TJ Berry or our County Commissioner about the filing and thus not able to voice an objection. Our State Representatives also never suggested that we file a complaint with the Public Service Commission and thus we just recently found out we were able to voice a complaint.

I think there are other alternatives available to Ameren putting this line in that will not affect my property or the property of the other land owners this powerline affects.

The alternatives would be:

1. To reclassify the territory to allow KCP&L (which already has power in the area) to supply the power to the LMV Plant.
2. To have Ameren and the Cooperative (the existing powerline) to work together to allow Ameren to obtain power from the Cooperative line. My understanding is that the Cooperative line is currently supplying the power to the LMV Plant and could continue to do so.
3. To require Ameren to obtain the power from their power station at Mosby along 69 Highway to the LMV Plant by using the existing power lines or upgrading their lines and using the right of way already in existence.

4. To encourage KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L through a meter agreement. KCP&L currently has a power station near the LMV Plant.

I believe these are workable alternatives that would not require a new high voltage powerline to be constructed through my family farm and the other property owners involved. It would also be less intrusive and cause less interference to all the property owners this

powerline would affect - especially the residents of the Clarksboro subdivision.

Thank you for considering this complaint.

Carolyn Noland

Eiken, Shelley

From: Doug Noland [doug@nolandlawfirm.com]
Sent: Monday, March 11, 2013 10:56 AM
To: Stoll, Steve
Subject: Ameren Power Line
Attachments: Letter to Commissioner Stephen M. Stoll on behalf of Robert and Anna Noland.pdf

Dear Commissioner Stoll:

Please see the attached letter on behalf of Robert and Anna Noland regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 11, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

This letter is on behalf of Robert and Anna Noland who are 89 and 90 years of age and own 170-acre farm in Liberty, Clay County, Missouri. Ameren is attempting to construct a high voltage transmission line across their property and has threatened eminent domain. The attempted line runs from a new plant construction, the LMV Plant, in Liberty east to the Clarksboro/Windsor Estates subdivision.

For months they have voiced their objection to this power line to their Representatives and State Senator to no avail. The County Commissioner had led us to believe that power to the LMV Plant was going to be supplied by Kansas City Power & Light, and that the power line would not be built. Then we learned that Ameren had filed something with the Public Service Commission for this power line and we were never notified of that, nor to our knowledge no other person affected by this power line, including our neighbors and those people that live in the Clarksboro/Windsor Estates subdivision were not notified as well. There has never been a public meeting until just last week when the property owners and concerned citizens got together themselves to voice their objection to this power line in a public place.

There are alternatives available to Ameren building this proposed power line.

- Reclassifying the territory to allow KCP&L, which has power available, to supply power to the LMV Plant
- Have Ameren and the Cooperative continue to work together to allow Ameren to obtain power off of the Cooperative line already there. It is our understanding that the Cooperative line is powering the Plant at the present time and could continue to do so for several years.

- Require Ameren to obtain power from its Mosby power station on 69 Highway and use the existing power lines and right of way already in existence, or upgrade the lines to the LMV Plant. This would go down 69 Highway on existing right of way.
- Encourage and ask KCP&L and Ameren to work together so that Ameren could purchase electricity from KCP&L, which already has power near the LMV Plant, through a meter agreement where Ameren could purchase electricity at wholesale through KCP&L and sell to LMV at an agreed rate.

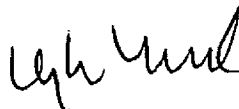
All of these alternatives would not require a new high voltage power line to be constructed through our property and our neighbors' properties. The alternatives would be less intrusive to us and all property owners in the area, and cause less interference to all of our property, and not interfere with our health and safety.

We are farmers and continue to operate a cow/calf operation on this 170-acre farm. There is already one power line across the property which is a cooperative line that has been there since we bought the property, over 35 years ago. Ameren's attempt to build another power line, and they want to run it parallel to the existing power line, would amount to an eight-lane interstate highway going through the middle of our property. It is the same with our neighbors to the west, Tom Tarwater and Carolyn Noland, and to the east, Robert Shemwell. It seems unfair that Ameren can attempt to build this power line when there are other alternatives available without going through our property and our neighbors' properties. This will have a significant and devastating effect on our property rights and future development.

Can Ameren's attempt at eminent domain be suspended until all of the alternatives are considered and our voice and objection are heard?

Thank you for your consideration in this matter.

Sincerely,



Douglass F. Noland
On Behalf of Robert and Anna Noland

Eiken, Shelley

From: Rick Spurgeon [RSpurgeon@OLATHEKS.ORG]
Sent: Monday, March 11, 2013 5:48 PM
To: Kenney, Robert; Jarrett, Terry; Stoll, Steve; Kenney, Bill
Cc: pmason@claycountymo.gov; Iridgeway@claycountymo.gov; Ryan.Silvey@house.mo.gov; Myron.Neth@house.mo.gov; TJ Berry; Doug Noland
Subject: Liberty, MO Ameren proposed powerline

I am sure you are aware of the proposed new overhead utility that Ameren is charging ahead to install near Liberty, MO. Had one of my neighbors, who caught a crew on-site, failed to contact me, I would not have known of the proposed installation to cross my property until nearly the day the installation began. Ameren has offered me a miserably tiny amount compared the damage I will receive by the powerline installation. But they seem, in essence, to say 'too bad' and that is the price I will receive with no alternative.

I purchased that property about two decades ago, with the long-range intent of selling for development when it arrives. Now that day is near and Ameren wants to snatch my retirement fund from me. Any development whatsoever will view that powerline as a detriment. It strictly limits future changes in use. That ground then becomes a liability to pay taxes on while not having use of it, plus the area still has to be maintained through mowing, etc. Of course, this does not even consider health / aesthetic concerns of adjacent, and other nearby, house lots that will substantially reduces home prices. I know future uses will never be considered, but since I will be providing 'infrastructure' for a large profit center for Ameren, perhaps I can provide the acreage at no cost, and then participate in annual profits for the life of the easement?

I suggested each of the following possibilities to Ameren at some point. Each was refuted as not possible, yet each one is. There are likely other alternatives that I have not thought of.

- 1 Allow KCP&L to provide metered power to Ameren, who would then provide it to the LMV plant. KCP&L is presently nearly at the back door of the plant.
- 2 Use, or upgrade, the existing Ameren line along 69 Highway from the Ameren substation.
- 3 Re-classify the tiny corner of Ameren's territory to KCP&L. On paper, it looks as though it should have been KCP&L to begin with.
- 4 Use, or upgrade, the existing cooperative line (easement) paralleling the proposed new one. Why double dip the property owners when it is not required?

From Ameren's past maintenance history, I am concerned about their lines crossing near me, too. Their reputation, acquired from a number of situations (most notably the upper Taum Sauk Reservoir incident), makes me want to avoid any contact with them. If I noticed, during a casual visit, that the reservoir looked to be near failure, surely they knew of the possibility, yet no action was taken.

I understand that both the City of Liberty, and various business interests want to see this project completed. I just believe it can be completed with far less damage to the property rights of individuals. There are many alternatives to be considered. If Ameren is planning annual revenue in the millions of dollars, why do they have to drive over the top of us tiny landowners to save a few bucks, if it even saves that? During the history of America, this type of action has always been frowned upon.

Please consider helping to solve the dilemma of providing electricity to the LMV plant with a more viable alternative. Stop Ameren's headlong advance over the top of us, and allow them to re-route in some manner.

If you would like to speak (or email) with me, please feel free to contact me. Thank you for your time, and thank you for allowing me to vent as the trodden individual I am (individuals we are).

Rick Spurgeon

913 634-1515

Eiken, Shelley

From: Doug Noland [doug@nolandlawfirm.com]
Sent: Tuesday, March 12, 2013 4:20 PM
To: Stoll, Steve
Subject: Ameren Power Line
Attachments: Letter to Commissioner Stephen Stoll with attachment.03-12-2013.pdf

Dear Commissioner Stoll:

Please see the attached letter and attachment regarding the Ameren power line in Liberty, Clay County, Missouri.

Thank you.

Douglass F. Noland
Noland Law Firm, LLC
34 Westwoods Drive
Liberty, Missouri 64068
816-781-5055 / fax 816-781-5216
Email: doug@nolandlawfirm.com
Website: nolandlawfirm.com

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NOLAND LAW FIRM LLC

DOUGLASS F. NOLAND
THOMAS K. MENDEL
ADMITTED IN MISSOURI & KANSAS

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

Re: Ameren Power Line

Dear Commissioner Stoll:

I have previously contacted each of you regarding our objection to a high voltage transmission line being prepared by Ameren in Liberty, Clay County, Missouri. I, and a number of citizens, filed a complaint online as was suggested to us at the public meeting that we had last week, where the citizens were finally able to voice their opposition in public to this power line.

Enclosed is the response that I received from the Consumer Service Department of the Missouri Public Service in response to the complaint filed. We would take issue with the response.

1. The response from the Consumer Service Department indicates that Ameren is unable to deliver the requisite amount of power to its new customer's business site. From our information, we would question that because Ameren is already providing power to this site. There are lights on at the location, which you can see by driving by the LMV building at night. Our State Representative T.J. Berry said that the LMV plant was currently being supplied power through a cooperative line and could continue to do so for several years.
2. There are other numerous alternatives of which Ameren can obtain this power to this location, which it appears from the response, were never even addressed. The alternatives are:

- a. Taking the power from the Cooperative line, which is already there. We were told at the public meeting that the Cooperative line was able to provide power for several years.
 - b. Upgrading route along 69 Highway from the Mosby Ameren power station to the LMV Plant.
 - c. Acquiring power from KCP&L, which we have been told has sufficient power, right next to the LMV Plant.
3. It appears from the response that the Commission's order was issued based solely upon information that Ameren had supplied, not listening or considering these alternatives.
4. I guess our questions to this Commission from this response by the Consumer Service Department are:
 - a. Do citizens and property owners not have a right and an opportunity to voice some objection to a high voltage transmission line that goes across their property, or adjacent to their property? Does there not have to be some type of public notice and an opportunity to be heard?
 - b. Does Due Process require any input from the citizens and property owners who are vastly affected by this line to have notice and some right of hearing before a decision that affects their rights is made? Or can the Commission just consider all the evidence from Ameren and not hear what the landowners say?
5. It appears that the Consumer Service Department's response is based only on information that Ameren supplied.
6. We would also take exception in Paragraph 4 where it says no public comments were received prior to approval. The public, the property owners, the people of the subdivision who live right next to this, had no idea that this was even going on because we were never told.
7. It seems to us that CSR 240-3.105 provides that notice should be required.

**"4 CSR 240-3.105 Filing Requirements for Electric Utility
Applications for Certificates of Convenience and Necessity**

(1) In addition to the requirements of 4 CSR 240-2.060(1), applications by an electric utility for a certificate of convenience and necessity shall include:

(A) If the application is for a service area—

1. A statement as to the same or similar utility service, regulated and nonregulated, available in the area requested;
2. If there are ten (10) or more residents or landowners, the name and address of no fewer than ten (10) persons residing in the proposed service area or of no fewer than ten (10) landowners in the event there are no residences in the area, or, if there are fewer than ten (10) residents or landowners, the name and address of all residents and landowners;"

No property owner or affected citizen was provided such notice and such is not in the application filed by Ameren. If, as the Consumer Service response is, that this is for a service line, it is a line that is not in Ameren's territory. It appears that they had to go into KCP&L area to run this line. So, would not that be a service outside their area that notice to 10 landowners would be required? And are not the citizens of the Clarksboro/Windsor Estates subdivision who are in KCP&L territory affected?

8. It seems from the Consumer Service response that the Public Service Commission's approval of the certificate of necessity was based only on information provided by Ameren. No opportunity for the public to provide their side or for the alternatives to building the power line addressed. No citizens had any notice or right to provide any input in the Public Service Commission's findings.

Thank you for your continued consideration.

Sincerely,



Douglass F. Noland

doug

From: PSC Info (Public Info Email Address) - PSC [pscinfo@psc.mo.gov]
Sent: Tuesday, March 12, 2013 12:31 PM
To: 'doug@nolandlawfirm.com'
Subject: RE: Public Service Commission - Complaint Form

Dear Mr. Noland,

Thank you for contacting our office. This e-mail is to acknowledge receipt of your comments regarding Ameren Missouri and the construction of a high voltage transmission line in Clay County. Your comments have been filed into the official case file of the Missouri Public Service Commission. The official case file number is EA-2013-0316.

On November 29, 2012, Ameren Missouri filed an application with the Missouri Public Service Commission ("Commission") for a Certificate of Convenience and Necessity to construct, install, own, operate, control, manage and maintain an electric sub-transmission line to provide electric service in Clay County, Missouri, for a new customer locating to Ameren Missouri's existing territory.

Commission rules on Certificates of Convenience and Necessity (CCNs) (4 CSR 240-3.105) have two distinct parts: Service Areas vs. line certificates. The utility would have been required to provide the name and addresses of the affected property owners if it was a request for new service territory. However, the request to extend the transmission line in Clay County in GA-2013-0316 was a request for a line certificate and Ameren Missouri was granted no new service area.

On December 17, 2012, the PSC Staff filed a recommendation advising the Commission to approve the application. In its recommendation, the PSC Staff stated that the new electric sub-transmission line is necessary because Ameren Missouri is currently unable to deliver the requisite amount of power to its new customer's business site.

On January 3, 2013 the Missouri Public Service Commission approved an application filed by Ameren Missouri seeking Commission authority to install, own and operate an electric sub-transmission line in Clay County near Liberty, Missouri. According to the application, the proposed line would provide electric service for a new customer locating to Ameren Missouri's existing territory. This line extension is to provide necessary power to the LMV automotive plant that will employ approximately 150 workers. The Commission approved the extension of 899 feet. Ameren did not have to get permission to build the majority of the line because it is in its own service territory. The Commission was only involved because one small piece of it went into the service territory of another IOU (KCP&L GMO). No public comments were received prior to the approval. Kansas City Power & Light Greater Missouri Operations did not oppose the Application.

If you have further questions regarding this case or any additional comments please contact our office at 1-800-392-4211. Thank you for taking the time to submit your comments for the record. If at any time you have questions or concerns regarding a regulated utility company, please feel free to contact our office.

Sincerely,

Consumer Service Department
Missouri Public Service Commission

From: EFIS Messenger
Sent: Friday, March 08, 2013 4:16 PM
To: Consumer Services
Subject: Public Service Commission - Complaint Form

Eiken, Shelley

From: Carolyn Noland [noland.ca@gmail.com]
Sent: Tuesday, March 12, 2013 4:48 PM
To: Stoll, Steve
Subject: Official Case File No. EA20130316
Attachments: Official Case File No. EA20130316.Commissioner Stephen Stoll.pdf

Dear Commissioner Stoll:

Please see the attached letter which was also faxed to you regarding the Ameren power line in Liberty, Clay County, Missouri / Official Case File No. EA20130316.

Please let me know your thoughts on this matter.

Carolyn A. Noland

N & N FARMS, INC.

Carolyn A. Noland
1516 Wellington Way
Liberty, Missouri 64068
816-781-6898
noland.ca@gmail.com

March 12, 2013

SENT VIA EMAIL AND FAX NO. 573-526-7341

Stephen M. Stoll, Commissioner
Missouri Public Service Commission
200 Madison Street
PO Box 360
Jefferson City, MO 65102-0360
Email: Steve.stoll@psc.mo.gov

RE: Official Case File No. EA20130316

Dear Commissioner Stoll:

I am writing in response to an email I received from "Customer Service Department Public Service Commission" on March 12, 2013, in response to a complaint I filed regarding Ameren's attempt to build a 69kV transmission line across my property. While I appreciate the Public Service Commission's (PSC) prompt response to my complaint, I felt it was lacking in several respects. The PSC provided no explanation as to why there were no public comments received prior to their January 3, 2013, approval of the application filed by Ameren seeking authority to build this new 69kV line. The PSC received no input nor did it seek any input from those residents and landowners who will be tremendously affected by the construction of this new line. I do not believe the process followed by the PSC and approval of Ameren's application was fair and was such that those who would be affected by this were not able to voice their thoughts and concerns regarding Ameren's plans. In addition, I do not believe the PSC followed its own rules because the residents or landowners who are affected by the PSC's January 3, 2013, approval were never contacted, despite the fact that there is a requirement to do so, according to your own rules. I also do not believe that the information that the PSC relied upon to make its determination is accurate. Your email states that the PSC staff found that the new electrical subtransmission line is necessary because Ameren is currently unable to deliver power to the LMV Plant. However, it is common knowledge for those who live near the LMV Plant that it currently is receiving power from an existing 69,000 volt line that is already in place. And Ameren is also able to deliver power to the Plant by any of the alternatives that I have listed in my complaint if anyone at the PSC would be willing to read and consider those in its review of the application.

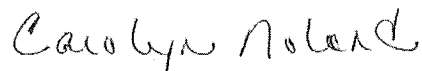
March 12, 2013
Stephen M. Stoll, Commissioner
Page 2

I would simply ask that the PSC take the thoughts and suggestions of these alternative routes from these many residents and landowners before making its decision. I simply do not understand how in the PSC's mission to represent all Missourians and how the landowners affected by this proposed power line would have been completely and totally ignored and not informed and then completely ignored after being informed.

Again, I would ask that the PSC reconsider its approval of Ameren's application and reverse its decision and seek the input of someone other than Ameren, who is an advocate for the line, and coming to factual determinations as to how best to deliver power to the LMV Plant so as to be fair to all of the parties involved in the matter and not just rely upon statements of fact by Ameren.

I would appreciate your prompt response in this matter and look forward to hearing from you.

Sincerely,

A handwritten signature in cursive script that reads "Carolyn A. Noland".

Carolyn A. Noland