

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

In the Matter of the Application of Ameren)
Transmission Company of Illinois for Other Relief)
or, in the Alternative, a Certificate of Public)
Convenience and Necessity Authorizing it to)
Construct, Install, Own, Operate, Maintain and)
Otherwise Control and Manage a 345,000-volt)
Electric Transmission Line from Palmyra, Missouri)
to the Iowa Border and an Associated Substation)
Near Kirksville, Missouri)

Case No. EA-2015-0146

**STAFF’S RESPONSE IN PARTIAL OPPOSITION TO
AMEREN TRANSMISSION COMPANY OF ILLINOIS’ MOTION FOR
RECONSIDERATION OF ORDER AMENDING PROCEDURAL SCHEDULE**

COMES NOW the Staff of the Missouri Public Service Commission, and for its response to Ameren Transmission Company of Illinois’ motion for the Commission to reconsider its Order amending the procedural schedule in this case, states:

1. Ameren Transmission Company of Illinois chose to file this case on May 29, 2015, requesting then that the Commission decide it by no later than January 31, 2016. At that time Ameren Transmission Company of Illinois knew, or should have known, of the opposition to transmission lines by those concerned with landowner rights—opposition well-organized and active in Grain Belt Express Clean Line LLC’s case originally filed March 26, 2014, where it sought a certificate of convenience and necessity for a high-voltage direct current transmission line across northern Missouri (Case No. EA-2014-0207).

2. While Staff is sensitive to Ameren Transmission Company of Illinois’ desire to start construction of this approximately 95-mile section of transmission line improvements that ultimately will primarily stretch from southcentral/southeast Iowa down across northeast Missouri, east across Illinois to Indiana as soon as possible,

moving the deadline for initial briefs a week from February 26, 2016, to February 19, 2016, following the end of the evidentiary hearing on January 29, 2016, even with expedited transcripts, leaves too little time for the parties to appropriately brief the issues in this case. Therefore, Staff opposes Ameren Transmission Company of Illinois' request to change the currently ordered briefing schedule of initial briefs due on February 26, 2016, and reply briefs due on March 18, 2016.

3. Staff does not oppose any of the other modifications to the procedural schedule that Ameren Transmission Company of Illinois proposes in its motion.

WHEREFORE, Staff opposes Ameren Transmission Company of Illinois' request to change the currently ordered, post-hearing briefing schedule.

Respectfully submitted,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or by electronic mail to all counsel of record on this 4th day of December, 2015.

/s/ Nathan Williams