## 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 in from Palmyra, ) Missouri, to the Iowa Border and Associated Substation ) Near Kirksville, Missouri. )

File No. EA-2015-0146

## APPLICATION TO INTERVENE OF UNITED FOR MISSOURI

COMES NOW United For Missouri, Inc. ("UFM"), by and through its counsel, pursuant to Commission Rule 4 CSR 240-2.075, and respectfully applies to intervene as a party in the above referenced case. In support of this Application, UFM states as follows:

1. UFM is a nonprofit mutual benefit corporation organized under the laws of the state of Missouri. Formed in July 2010, UFM has over 77,000 members and is committed to serving its members and the public in educating the public about and supporting economic policies in the state that will achieve growth, opportunity and prosperity. A component of economic policies that will achieve growth, opportunity and prosperity is the protection of land and property rights. UFM seeks to help state legislators, state-wide elected officials, state agencies, the media and individual citizens understand why the American free enterprise system is the best method of ensuring prosperity for all Missourians.

On May 29, 2015, Ameren Transmission Company of Illinois ("ATXI") filed its
Application ("ATXI Application") with the Missouri Public Service Commission
("Commission") in the above referenced file.

3. On June 2, 2015, the Commission issued its *Order and Notice*. It established a deadline to file applications to intervene of June 22, 2015.

4. UFM's interest is different than the interest of the general public. UFM's intervention and participation in this proceeding would serve the public interest in that it will provide the Commission with UFM's land rights perspective and help refine issues. UFM seeks to become a party to this case for all purposes.

5. UFM does not oppose the ATXI Application. However, out of a deep respect for property rights in this country and state, UFM desires to intervene and express those views, and if necessary, defend those rights, in this case.

WHEREFORE, for the foregoing reasons, United for Missouri respectfully requests the Commission grant its Application to Intervene in this matter.

Respectfully submitted,

By: <u>/s/ David C. Linton</u>

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## CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing Application to Intervene was sent to all parties of record in File No. EA-2015-0146 via electronic transmission this 18th day of June, 2015.

<u>/s/ David C. Linton</u>