

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

In the Matter of the Application of Ameren)
Transmission Company of Illinois for a)
Certificate of Convenience and Necessity)
under Section 393.170.1, RSMo and)
Approval to Transfer an Interest in) File No. EA-2024-0302
Transmission Assets Under 393.190.1,)
RSMo relating to Transmission Investments)
In Northwest and Northeast Missouri)

APPLICATION TO INTERVENE
OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION d/b/a
MISSOURI ELECTRIC COMMISSION

The Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”) hereby respectfully moves and files its Application to Intervene in this matter pursuant to Commission Rule 4 CSR 4240-2.075. In support of this Application, MEC states as follows:

1. On July 16, 2024, Ameren Transmission Company of Illinois (“ATXI”) filed an Application for a Certificate of Convenience and Necessity and for Approval to Transfer an Interest in Transmission Assets relating to Transmission Investments in Northwest and Northeast Missouri (“CCN Application”) authorizing ATXI (1) to construct, install, operate, control, manage and maintain (i) approximately 44 miles of 345 kV transmission line, in two segments, in Worth, Gentry, and DeKalb counties, and a new 345 kV substation named Denny in DeKalb county, referred to as the Fairport-Denny-Iowa/Missouri border (FDIM) Project; and (ii) approximately 9 miles of 345 kV transmission line in Marion county between ATXI’s existing Maywood Substation near Palmyra, Missouri, and the Mississippi River Illinois/Missouri border, including upgrades to the Maywood Substation, referred to as the Maywood-Mississippi River Crossing (MMRX) Project; and (2) to transfer an undivided 49% interest in the transmission facilities for

the FDIM Project, excluding the land for the Denny Substation, to MEC shortly before the FDIM Project is placed into service. On July 18, 2024, the Commission issued its Order setting a deadline of August 16, 2024, for filing Applications for Intervention.

2. MEC is a body corporate and politic of the State of Missouri, organized as a joint municipal utility commission pursuant to Section 393.700 *et seq.* Revised Statutes of Missouri, to construct, operate, and maintain jointly owned transmission and generation facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with any person for the transmission of electric power. MEC is organized on a state-wide basis to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the power and energy requirements of the municipal electric utilities in the State of Missouri. MEC's membership includes seventy-two municipal entities in Missouri and four advisory members in Arkansas. Together, MEC's members serve over 500,000 electric customers, over 350,000 of which are Missourians.

3. Correspondence, communications, orders, and the decision in this matter should be addressed to:

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4. MEC is working with ATXI and Ameren Missouri to build a more reliable and resilient energy grid for the future through the Missouri jurisdictional portion of MISO's Long Range Transmission Planning Tranche 1 Portfolio – specifically the FDIM Project. On October 27, 2023, MISO chose ATXI to be the Selected Developer for the FDIM Project and recognized MEC as a project partner. With its CCN Application, ATXI seeks authority to transfer to MEC a 49% interest in the FDIM Project (excluding the land for the Denny Substation) shortly before the project is placed into service. MEC will act as essentially a “passive investor” and will contribute 49% of the cost of the FDIM Project. Because of the manner in which MEC is taxed and its lower municipal debt costs, the combination of removing MEC's investment from ATXI's investment and the lower transmission charges arising from MEC's investment will lower the overall investment in the FDIM Project and result in savings for Missouri customers.

5. MEC has an interest that is different from that of the general public in that it is a MISO-recognized partner and investor in the FDIM Project which is a subject of the CCN Application. MEC thus has a direct and immediate interest in this proceeding that is not currently represented in this matter.

6. MEC takes a position in support of the CCN Application.

WHEREFORE, MEC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this case.

Dated: July 22, 2024

Respectfully submitted,

HEALY LAW OFFICES, LLC

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 22nd day of July, 2024.

/s/ Peggy A. Whipple
Peggy A. Whipple