

**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 ) File No. EA-2025-0087  
under Section 393.170.1, RSMo Relating )  
to Transmission Investments in North )  
Central 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 December 11, 2024, Ameren Transmission Company of Illinois (“ATXI”) filed an “Application for a Certificate of Convenience and Necessity under Section 393.170.1, RSMo. relating to Transmission Investments in North Central Missouri” (“CCN Application”) authorizing ATXI to (1) construct, install, own, operate, control, manage and maintain slightly over 200 miles of new 345 kV transmission lines across DeKalb, Daviess, Grundy, Sullivan, Adair, Knox, Lewis, Marion, Macon, and Randolph Counties, referred to as the Denny-Zachary-Thomas Hill-Maywood (DZTM) Project; and (2) to transfer an undivided 49% interest in certain transmission facilities for the DZTM Project to MEC shortly before the applicable portions of the DZTM Project are placed into service. On December 13, 2024, the Commission issued its Order setting a deadline of January 10, 2025, 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:

Peggy A. Whipple  
Healy Law Offices, LLC  
3010 East Battlefield, Suite A  
Springfield, MO 65804  
Telephone: (417) 864-7018  
Facsimile: (417) 864-7018  
Email: [peggy@healylawoffices.com](mailto:peggy@healylawoffices.com)

Douglas L. Healy  
Healy Law Offices, LLC  
3010 East Battlefield, Suite A  
Springfield, MO 65804  
Telephone: (417) 864-7018  
Facsimile: (417) 864-7018  
Email: [doug@healylawoffices.com](mailto:doug@healylawoffices.com)

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 DZTM Project. On April 2,

2024, MISO chose ATXI to be the Selected Developer for the DZTM Project and recognized MEC as a project partner. With its CCN Application, ATXI seeks authority to transfer to MEC a 49% interest in the portions of the DZTM Project that were subject to MISO's Competitive Developer Selection Process 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 DZTM 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 DZTM 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 DZTM Project which is the 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: December 30, 2024

Respectfully submitted,

HEALY LAW OFFICES, LLC

/s/ Peggy A. Whipple  
Peggy A. Whipple, MO Bar 54758  
Douglas L. Healy, MO Bar 51630  
3010 East Battlefield, Suite A  
Springfield, MO 65804  
Telephone: (417) 864-7018  
Facsimile: (417) 864-7018  
Email: [peggy@healylawoffices.com](mailto:peggy@healylawoffices.com)  
[doug@healylawoffices.com](mailto:doug@healylawoffices.com)

#### **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 30th day of December, 2024.

/s/ Peggy A. Whipple  
Peggy A. Whipple