

**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 Transmission Assets )  
Under 393.190.1, RSMo relating to transmission )  
Investments in Northwest and Northeast )  
Missouri. )

Case No. EA-2024-0302

**RESPONSE OF RENEW MISSOURI AND CLEAN GRID ALLIANCE TO STAFF'S  
RECOMMENDATION AND TO OPC'S REQUEST FOR EXTENSION OF TIME**

**COMES NOW** Renew Missouri Advocates d/b/a Renew Missouri (“Renew Missouri”) and Clean Grid Alliance (“CGA”), with a joint response to Staff’s recommendation and to the Office of Public Counsel’s (“OPC”) motion for extension of time, respectfully states as follows:

1. On July 16, 2024, ATXI filed the application in the instant case seeking a certificate of convenience and necessity (“CCN”) for the Fairport-Denny-Iowa/Missouri border and Maywood-Mississippi River Crossing Projects (“Projects”). The Projects are the first phase of the Missouri jurisdictional portion of the Midcontinent Independent System Operator, Inc.’s (“MISO”) Long Range Transmission Planning (“LRTP”) Tranche 1 portfolio.

2. Pursuant to Commission Order, on December 20, 2024, Staff filed a recommendation on the application. Staff’s analysis concluded that the project is needed, ATXI is qualified to construct, install, own, operate, maintain, and otherwise control and manage the

Projects, ATXI has the financial ability to undertake the projects, the Projects are economically feasible, and the Projects are in the public interest with the conditions recommended by Staff.<sup>1</sup>

3. On January 24, 2025, the Commission issued its Order Directing Filing ordering that “any other party who wishes to respond to Staff’s recommendations shall file their response no later than February 7, 2025.”

4. On February 7, 2025, MISO submitted a response to the Staff Recommendation.

5. Also on February 7, 2025, the OPC submitted a motion to extend time to respond to the Staff recommendation.

6. Renew Missouri and CGA support and join the response of MISO to the Staff Recommendation. Specifically, Renew Missouri and CGA agree that the Commission should issue an order granting ATXI’s request for a CCN for the Projects, that the projects are needed and economically feasible, and that the request should be granted without conditions that may cause undue delay of the Projects’ proposed in-service date, such as Staff’s proposed condition of approval of the Projects in the instant proceeding on the approval of the project that is the subject of Case No. EA-2025-0087.

7. In light of the above-stated interest of Renew Missouri and CGA in avoiding delay in the development of the Projects, Renew Missouri and CGA also do not object to the OPC’s request for a 30-day extension of time to respond to Staff’s recommendation in the case, if such extension of time avoids the need for this proceeding to go to hearing.

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<sup>1</sup> Staff Recommendation, p. 1. (Dec. 20, 2024)

**WHEREFORE** Renew Missouri and CGA do not oppose the OPC's request for extension of time and further support the Commission granting the request for a CCN without conditioning such a grant on an approval in any other proceeding.

Respectfully submitted,

/s/ Nicole Mers

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System this 7th day of February, 2025.

/s/ Nicole Mers \_\_\_\_\_  
Nicole Mers