

**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-2024-0302
Under Section 393.170.1, RSMo Relating )	
to Transmission Investments in Northwest )	
and Northeast Missouri )	

**APPLICATION TO INTERVENE OF REBECCA MCGINLEY AND  
MCGINLEY-KRAWCYK FARMS**

Rebecca McGinley and McGinley-Krawczyk Farms, LLC, pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission’s Rules of Practice and Procedure and this Commission’s April 4, 2025, Order Setting Intervention Deadline, and for their Application to Intervene respectfully state as follows:

1. Rebecca McGinley, sole member of McGinley-Krawczyk Farms, LLC, owns 765 acres in Gentry County, Missouri and 473 of those acres (which consists of 2 separate parcels) (the “Property”) are slated to be affected by this Project (which she or her family have owned since 1970 (parcel #1, 218 acres) and 1987 (parcel #2, 255 acres). The Property includes the McGinley’s primary residence where she, her husband, and two minor children reside, as well as other structures, including a guest house and also a machine shed and two garages that her father built before he died. The proposed route affects both of the parcels owned by McGinley, including the parcel with her primary residence. As such, the specific interests of McGinley are different from the interests of the general public.

2. On July 16, 2024, Ameren Transmission Company of Illinois (ATXI) filed an Application and Direct Testimony in support of its request for a certificate of convenience and necessity (“CCN”) 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.

3. Rebecca McGinley and McGinley-Krawczyk Farms seek intervention because the proposed transmission line would directly adversely impact their Property.

4. Rebecca McGinley and McGinley-Krawczyk Farms oppose the relief sought by ATXI as proposed in the application.

5. How the Project impacts landowners is relevant to whether the project is in the public interest - an issue which the Commission will determine in this case. If the Commission grants ATXI the CCN, Rebecca McGinley and McGinley-Krawczyk Farms support the imposition of certain conditions to protect property owners, and in particular, their own Property. At this time, Rebecca McGinley and McGinley-Krawczyk Farms are reviewing ATXI's initial filings and are unsure of any additional positions they will take in this case.

6. Intervention by Rebecca McGinley and McGinley-Krawczyk Farms will serve the public interest in providing unique information and insights to assist the Commission in developing a complete record in order to make its determination.

7. The interest of Rebecca McGinley and McGinley-Krawczyk Farms

will not and cannot be adequately represented by any other party.

8. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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308 East High Street, Suite 300  
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**WHEREFORE**, Rebecca McGinley and McGinley-Krawczyk Farms respectfully request that the Commission issue an order granting their Application to Intervene and that McGinley and McGinley-Krawczyk Farms, LLC be made parties hereto with all rights to participate in this case.

Respectfully submitted,

**ELLINGER BELL LLC**

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McGinley-Krawczyk Farms*

## **CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on May 6, 2025.

/s/ Stephanie S. Bell