

**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,)	File No. EA-2024-0302
RSMo. And Approval to Transfer an)	
Interest in Transmission Assets Under)	
393.190.1, RSMo relating to Transmission)	
Investments in Northwest and Northeast)	
Missouri.)	

JOINT RESPONSE TO STAFF’S MOTION FOR PROCEDURAL CONFERENCE

Ameren Transmission Company of Illinois (ATXI), the Missouri Joint Municipal Electric Utility Commission d/b/a Missouri Electric Commission (“MEC”), Renew Missouri Advocates d/b/a Renew Missouri (Renew Missouri), Clean Grid Alliance, and Midcontinent Independent System Operator, Inc. (“MISO”) (Joint Respondents) respectfully submit this Joint Response to Staff’s Motion for Procedural Conference filed on May 29, 2025, to more fully advise the Missouri Public Service Commission (Commission) of the parties’ efforts to reach an agreed procedural schedule and the status of those efforts.

1. On May 7, 2025, the Missouri Public Service Commission (Commission) issued its Order Regarding Applications to Intervene and Directing Filing of Procedural Schedule, which included directing Staff to file a joint proposed procedural schedule no later than May 20, 2025, including prefiled testimony from all parties and a date for an evidentiary hearing if requested.

2. On May 20, 2025, Staff filed a Motion for Extension for the deadline to file a procedural schedule to May 29, 2025, to allow the parties to continue to engage in scheduling discussions.

3. On May 20, 2025, the Commission issued its Order Regarding Prehearing Conference and Filing of Procedural Schedule, granting Staff’s Motion for Extension to

May 29, 2025.

4. On May 29, 2025, Staff filed a Motion for Procedural Conference (Staff's Motion), stating that the Parties are unable to agree on a date for the hearing, and requested the Commission schedule a procedural conference.

5. On May 30, 2025, the Commission issued an *Order Setting a Procedural Conference*, granting Staff's Motion and scheduling a procedural conference for June 9, 2025, at 1:00 p.m.

6. However, as noted above, Joint Respondents submit that it is important for the Commission to more fully understand the Parties' efforts to negotiate a procedural schedule and the status of those efforts.

7. Staff circulated a Draft Joint Proposed Procedural Schedule to all parties on May 22, 2025, to which various parties responded, providing conflict dates and proposing modifications to the draft schedule. The following procedural events and dates were either agreed to or not expressly opposed by any party:

Optional Direct Testimony Due	June 20th
Optional Rebuttal Testimony Due (all parties except ATXI)	June 27th
Optional Rebuttal Testimony Due (ATXI)	July 3rd
List of Issues, List of Witnesses, Order of Cross-Examination	July 10th
Position Statement	July 24th

8. Additionally, with the exception of one party, all Parties either agreed to or did not express opposition to a July 29th evidentiary hearing date. One party sent an email to Staff counsel only on May 23, 2025, recommending dates for September, which Staff circulated to other parties on May 27, 2025. ATXI, MISO, and MEC expressed opposition to a September hearing date but expressed their willingness to discuss an August hearing date. ATXI also reached out to the one party proposing September dates via email on May 28, 2025 (no phone number is of record for

this party in this proceeding) to attempt to discuss mutually agreeable hearing dates. To date, ATXI has not received any return communication from this party.

9. In less than seven (7) weeks, this proceeding will reach the one (1) year mark since the filing of ATXI's Application.¹ The schedule for the FDIM and MMRX Projects which are the subject of this proceeding anticipated a Commission order in February 2025, with easement acquisition occurring from February 2025 through July 2026, and tree clearing to occur from November 2026 through March 2027. (ATXI Schedule TD-D2). The Company seeks to maximize the time to negotiate with landowners and address concerns within its current construction schedule. In addition, the Company must acquire easements prior to actual tree clearing, which typically must be done within a relatively short, specified time period each year due to environmental constraints and requirements for the protection of endangered animal species.

10. ATXI and the Joint Respondents appreciate Staff's efforts to facilitate an agreed procedural schedule, but are concerned that ATXI's ability to complete the Phase 1 Projects within the timeline outlined in its testimony may be unnecessarily jeopardized if the procedural schedule is further delayed.

WHEREFORE, Joint Respondents respectfully request that the Commission take this information into account at the procedural conference scheduled for June 9, 2025 and in setting a procedural schedule in this matter.

¹ On July 16, 2024, ATXI filed an application with the Commission seeking an order granting a CCN pursuant to Section 393.170.1, RSMo, as well as the direct testimony of eleven witnesses. The CCN would authorize ATXI to construct, install, own, operate, maintain, and otherwise control 44 miles of 345 kV transmission line, in two segments, in Worth, Gentry, and DeKalb counties, a new 345 kV substation named Denny in DeKalb county (the Fairport-Denny-Iowa/Missouri Border or FDIM Project), and 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 (Maywood-Mississippi River Crossing or MMRX Project). The application also requests permission and authority 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.

Dated: June 2, 2025

Respectfully submitted,

/s/ Carmen L. Fosco

Albert D. Sturtevant (practicing *pro hac vice*)

Carmen L. Fosco (practicing *pro hac vice*)

WHITT STURTEVANT LLP

180 North LaSalle Street, Suite 2020

Chicago, Illinois 60601

Telephone: (312) 680-9238

sturtevant@whitt-sturtevant.com

fosco@whitt-sturtevant.com

Eric A. Dearmont (Mo. Bar #60892)

Jason Kumar (Mo. Bar #64969)

Ameren Service Company

1901 Chouteau Avenue

Post Office Box 66149 (MC 1310)

St. Louis, Missouri 63166-6149

Telephone: (314) 861-4869

edearmont@ameren.com

jkumar@ameren.com

***Attorneys for Ameren Transmission Co
of Illinois***

/s/ Nicole Mers

Nicole Mers, Bar No. 66766

501 Fay Street, Suite 206

Columbia, MO 65201

T:314-308-2729

nicole@renewmo.org

***General Counsel for Renew Missouri
Advocates***

/s/ Judith Anne Willis

Judith Anne Willis (MO Bar # 63327)
Judith Anne (Annie) Willis
The Law Office of Judith Anne Willis
P.O. Box 106088
Jefferson City, MO 65110
Telephone: 573-301-8082
email: jaw@anniewillislaw.com

Attorney for Clean Grid Alliance

/s/ Jeffrey L. Small

Jeffrey L. Small
Senior Corporate Counsel
Midcontinent Independent System
Operator, Inc.
720 City Center Drive
Carmel, IN 46032
(317) 752-7149
jsmall@misoenergy.org

Max W. Meyer, Mo Bar #75677
Associate Corporate Counsel
Midcontinent Independent System
Operator, Inc.
2985 Ames Crossing Road
Eagan, MN 55121
(952) 232-9130
mmeyer@misoenergy.org

William D. Steinmeier, Mo Bar #25689
William D. Steinmeier, P.C.
2031 Tower Driver
Jefferson City, MO 65109
(573) 659-8672
wds@wdspsc.com

***Attorneys for Midcontinent Independent
System Operator, Inc***

/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
peggy@healylawoffices.com
doug@healylawoffices.com

Attorneys for MEC

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was mailed, hand-delivered, or transmitted by facsimile or electronic mail to pre se parties and counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on June 2, 2025.

/s/. Carmen L. Fosco

Carmen L. Fosco