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Illinois
File No.: EA-2024-0302
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2024-0302

REBUTTAL TESTIMONY

OF

SAM MORRIS

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

St. Louis, Missouri
August 14, 2025

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I. INTRODUCTION AND BACKGROUND

Q. Please state your name and business address.

A. My name is Sam Morris. My business address is 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and in what capacity?

A. I am employed by Ameren Services Company (Ameren Services) as Senior Manager of Project Management. In this case I am testifying on behalf of Ameren Transmission Company of Illinois (ATXI).

Q. What are your responsibilities as Senior Manager of Project Management?

A. In my current position as Senior Manager of Project Management for Ameren Services, I am responsible for supervising and leading a team of co-workers to plan, execute, organize, support, audit, report, and control major transmission projects.

Q. Please describe your educational and professional background.

A. In 2007, I earned a Bachelor of Science in Mechanical Engineering degree from the University of Missouri-Columbia, graduating cum laude. In 2022, I earned a Masters degree in Business Administration from University of Illinois Urbana-Champaign. I am a Certified Project Management Professional (PMP) from the Project Management Institute (PMI).

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1 In 2008, I started working for Ameren Missouri as an Engineer in the Program's
2 Engineering department at the Callaway Energy Center. I worked at Callaway for Ameren
3 Missouri from January 2008 through March 2013. During my time at Callaway, I was responsible
4 for planning and coordinating diagnostic and predictive testing, as well as designing efficient
5 maintenance plans and major replacements for various plant components. My specific areas of
6 expertise continued to grow in my tenure at Callaway and expanded to include primary as I was
7 promoted from Associate Engineer to Engineer, and ultimately to Career Engineer including
8 specializing in heat exchangers, pumps, check valves, and oil analysis.

9 In March 2013, I accepted a role outside of Ameren as a project manager for Bastian
10 Robotics where I successfully led teams in the identification, design, implementation, and testing
11 of robotic automation solutions for industrial firms across a wide array of industries, including
12 food and beverage, automotive, and commercial packing for Fortune 500 companies. In this role,
13 I was the primary interface between Bastian's internal design, fabrication, and commissioning
14 teams and the customer representatives to ensure that project requirements were well-established,
15 documented, communicated, and executed.

16 In November 2015, I returned to Ameren as a project manager for Ameren Services
17 managing large capital transmission projects. Prior to my promotion to Manager of Project
18 Management in 2019, my portfolio of capital projects had grown to greater than \$350 million
19 including managing the largest capital project in the department's portfolio and annual capital
20 spend of greater than \$100 million. With my promotion to Manager, I provided direct supervision
21 of a team of 10 to 15 project managers tasked with executing an annual portfolio of greater than
22 \$300 million in capital projects.

1 **Q. Have you previously testified before the Missouri Public Service Commission?**

2 A. No, I have not testified before the Missouri Public Service Commission
3 (Commission). I have testified before the Illinois Commerce Commission on behalf of ATXI and
4 Ameren Illinois Company.

5 **II. PURPOSE OF TESTIMONY AND SCHEDULES**

6 **Q. Are you familiar with the electric transmission projects that ATXI proposes in**
7 **this proceeding?**

8 A. Yes. ATXI is working to build a more reliable and resilient energy grid for the
9 future, and to construct, own, and operate certain transmission assets as part of the Northern
10 Missouri Grid Transformation Program (Program). This application concerns the first phase of the
11 Program (Phase 1), which encompasses two projects: the Fairport-Denny-Iowa/Missouri Border
12 Project (FDIM) and the Maywood-Mississippi River Crossing Project (MMRX). FDIM includes
13 the construction of approximately 44 miles of 345-kV transmission line and a new 345-kv
14 substation and will route through DeKalb, Gentry, and Worth counties. MMRX includes the
15 construction of approximately nine miles of 345-kv transmission line from ATXI's existing
16 Maywood Substation to the Mississippi River Missouri/Illinois border and upgrades to the
17 Maywood Substation.

18 In this proceeding, ATXI is requesting certain approvals from the Commission to make the
19 Program a reality and deliver its benefits to Missouri electric customers.

20 **Q. Have you testified previously in this proceeding?**

21 A. No, I have not provided testimony in this proceeding. However, as a preliminary
22 matter, I am adopting as my own the direct testimony of Ms. Tracy Dencker and accompanying

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Schedules TD-D1 through TD-D5 previously filed in this docket on July 16, 2024. Ms. Dencker has retired since filing her direct testimony.

Q. What is the purpose of your rebuttal testimony?

A. My rebuttal testimony responds to and provides certain information responsive to the direct testimony of Landowner Intervenor Mark Harding, Rochelle Hiatt, F. Neil Mathews, and Rebecca McGinley. Specifically, my rebuttal testimony covers safety concerns raised, and the feasibility of route adjustments proposed/suggested by certain Intervenor from a cost, constructability, and technical perspective.

Q. Are you sponsoring any schedules with your rebuttal testimony?

A. No.

Q. Are you offering any legal opinions in your direct testimony?

A. No. Although I refer to certain legal requirements related to Phase 1 of the Program as I understand them, I am not an attorney, and my rebuttal testimony is not intended to offer any legal opinions.

III. RESPONSE TO INTERVENOR SAFETY CONCERNS

Q. What safety concerns were raised by certain intervenors?

A. Certain intervenors raise concerns regarding electromagnetic field (EMF) exposure emitted by electric transmission lines.

1 **Q. Is ATXI aware of any conclusive health risks associated with EMF emitted**
2 **from electric transmission lines?**

3 A. No. First, it is my understanding that this topic has been raised in previous
4 transmission line certificate proceedings before the Commission, and testimony related to EMF in
5 past proceedings is publicly available.

6 Second, ATXI is not aware of any conclusive findings of health risks associated with EMF
7 at levels associated with the Project's facilities. Reputable scientific organizations and health
8 agencies, such as the World Health Organization (WHO), have thoroughly considered this issue
9 and have concluded that, on balance, the scientific weight of evidence does not support the
10 conclusion that low level EMF exposure causes any long-term adverse health effects. ATXI is not
11 aware of any recent research that provides evidence to alter this overall conclusion. The findings
12 of the WHO and other agencies have concluded that current evidence does not confirm the
13 existence of any health consequences from exposure to low level electromagnetic fields. These
14 conclusions apply to all sources of these fields in our environment, including power distribution
15 lines, transmission lines, as well as electrical appliances. Moreover, electromagnetic field (EMF)
16 levels measured at the edge of the right-of-way, and beyond its boundaries, are significantly below
17 international standards and exposure guidelines designed to protect public health.

18 **Q. Has Staff addressed the issue in this proceeding?**

19 A. Yes. In their Recommendation, Staff notes that "...the Commission has granted a
20 line certificate in EA-2007-0319, 2 EA-2013-0089, EA-2015-0146, EA-2017-0345, and EA-2021-
21 0087, among others. Staff does not recommend rejection of the application on the basis of public
22 concerns about the impact of EMF on health." (Staff Recommendation at 40:1-4.)

IV. RESPONSE TO ROUTE ADJUSTMENT PROPOSALS

Q. Have any other parties to the proceeding proposed adjustments to ATXI's Proposed Route for the FDIM Project?

A. Yes, three intervenors have suggested adjustments or modifications to the Proposed Route on the FDIM Project filed in ATXI's application (also referred to as DO-28, which was its preliminary designation in the Route Selection Study, attached to the direct testimony of ATXI witness James Nicholas as Schedule JS-D1).

Q. Can you generally state ATXI's position on the route adjustments relative to its Proposed Route for FDIM?

A. ATXI continues to support its Proposed Route for the FDIM Project for the reasons explained in its direct testimony. However, although certain intervenor suggested modifications are not preferable or superior to the Proposed Route, I do conclude that some of those modifications may be constructable and technically feasible. In the interest of resolving as many disputes as practicable and narrowing the contested issues in this proceeding, at this time ATXI would not object if the Commission were to order such route modifications, as I explain further below.

Q. What is the status of proposed adjustments and their acceptance by ATXI or other parties?

A. ATXI has engaged in ongoing conversations with a number of landowners, including the intervenors, to try and address their concerns. This type of ongoing engagement and review of potential route adjustments, or micrositing, to address concerns or constraints identified by affected landowners is a standard practice for ATXI. Several of the route modifications that

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1 have been proposed are discussed in the rebuttal testimony of ATXI witness James Nicholas.
2 However, I will provide background information on the modifications or adjustments proposed
3 and address the feasibility from a cost, constructability and technical standpoint, as applicable.

4 **A. Harding**

5 **Q. Can you please describe the potential route modifications affecting Mr.**
6 **Harding's property and the status?**

7 A. Yes. ATXI has had numerous discussions with Mr. Harding in an attempt to address
8 the concerns he has raised regarding potential impacts to his property, and there have been several
9 potential modifications to the Proposed Route that have been discussed in an effort to address his
10 concerns. Both ATXI and Mr. Harding have proposed route several route modifications to each
11 other. However, Mr. Harding and ATXI have not been able to reach agreement on a mutually
12 acceptable modification.

13 **Q. Has ATXI engaged in discussions with Mr. Harding regarding route**
14 **modifications or adjustments for the FDIM Project?**

15 A. Yes. ATXI attempts to gather information from all affected landowners throughout
16 the public engagement and regulatory approvals process, including regarding concerns related to
17 the Proposed Route for the Projects. As mentioned above, ATXI has engaged in many discussions
18 with Mr. Harding regarding potential route adjustments to address the concerns he has raised in an
19 attempt to find a workable solution for all parties. This includes a significant number of emails
20 and phone calls, as well as personally visiting with him at his property to review Mr. Harding's
21 concerns. Dating back to November 2024, ATXI attempted to address Mr. Harding's concerns by

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1 offering potential route modifications to Mr. Harding on his property. However, ATXI and Mr.
2 Harding have not been able to come to agreement on mutually acceptable route modification.

3 **Q. What is ATXI's position on any route modifications for the FDIM Project on**
4 **Mr. Harding's property?**

5 A. Mr. Harding depicts two potential route modifications within his direct testimony
6 and the attachments. The first route modification is depicted by a red line in Attachment L to Mr.
7 Harding's direct testimony (which I will refer to as "Harding Modification 1"). Harding
8 Modification 1 connects a portion of ATXI's Proposed Route (DO-28) with a portion of a
9 preliminary route segment previously studied (DO-27). Based upon preliminary reviews, this
10 route appears to be technically constructable, however, there are several concerns that ATXI is not
11 aware to have been addressed. First, ATXI's Proposed Route more closely follows along an
12 existing road (Pike Avenue) and generally along property or section lines, whereas the Harding
13 Modification 1 is generally located more centrally through affected parcels. Such a modification
14 would also impact landowners differently, which may or may not be preferred by those
15 landowners. Further, the route modification may increase difficulty associated with construction
16 access due to the increased distance from the roadway.

17 Mr. Harding's second route modification is depicted as the solid blue line/corridor in
18 Attachment N to Mr. Harding's direct testimony (which I will refer to as "Harding Modification
19 2"). Harding Modification 2 modifies the Proposed Route generally on or near his property to
20 follow along the western property boundary before turning east along the northern boundary for
21 his property. While this route appears to be technically constructible, ATXI has estimated a cost
22 increase associated with this route modification due to the addition of at least two heavy angle

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1 structures and one medium angle structure, and an increase in overall route length of approximately
2 1,200 feet. ATXI has estimated the cost for this design change to be approximately \$800,000.

3 In an attempt to reach a mutually acceptable solution, while minimizing the additional
4 costs, ATXI proposed a modification to Harding Modification 2 which would traverse diagonally
5 across his property (which I will refer to as "Harding Modification 3"). Harding Modification 3 is
6 depicted by the blue hashed line in Attachment N to Mr. Harding's direct testimony. However, the
7 parties were not able to reach an agreement.

8 For these reasons, and as further explained in the direct testimony of Mr. Nicholas, ATXI
9 continues to support the Proposed Route (DO-28) for this area relative to any other modification
10 proposed. However, as explained above, and further discussed by ATXI witness Mr. Nicholas in
11 his rebuttal testimony, the Harding route modifications appear to be technically constructible and
12 on balance relatively comparable (in terms of routing criteria) to ATXI's Proposed Route in this
13 area. Therefore, while ATXI continues to support its Proposed Route, in the interest of addressing
14 concerns raised by affected landowners, ATXI would not object to Commission approval of an
15 adjustment or modification of the Proposed Route across the Harding property, should the
16 Commission deem appropriate. ATXI respectfully notes, however, that the Commission should
17 consider the costs to customers and impacts to adjacent landowners outlined above. That said,
18 ATXI would not object to modifications on parcels owned by landowners who received notice of
19 the proceeding.

20 **Q. Mr. Harding notes concerns that portions of ATXI's Proposed Route (DO-28)**
21 **remained under water for several days this year. He offers his opinion that this would be**

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1 **more restrictive for maintenance and construction than any "USDA hog barn" land. Do you**
2 **agree?**

3 A. No. While low lying and flood plain areas are a consideration that is factored into
4 routing decisions, the proximity of a significant portion of this line to existing roads can help to
5 improve access for initial construction and future maintenance. Further, ATXI is largely targeting
6 construction of this line in the summer and fall months, when rainfall is typically lower, to help
7 alleviate concerns with wet weather. ATXI works with its contractors to plan construction in areas
8 that may be prone to extended wet conditions during dry periods and can sequence work to help
9 minimize these concerns.

10 In contrast, whereas wet conditions are generally temporary in nature, restrictions
11 associated with facilities engaged in industrial animal agricultural, concentrated livestock
12 production, or USDA farm operations, are not temporary and therefore cannot be mitigated through
13 planning work in a particular season. While I am not an expert, my understanding is these types
14 of facilities commonly have stringent requirements and restrictions in place to protect the health
15 and wellness of animals and humans, prevent disease and biological hazards, reduce impacts on
16 quality of water and air, and to ensure the safety of the food supply. Requirements typically include
17 restrictions on access, such as requiring advance notice to access the property, limited entry points,
18 limiting the number of outside individuals to the farm, and documenting/record keeping of visitors.
19 They can also place limitations on the location and movement of vehicles and equipment, and may
20 require monitoring or escort by farm personnel. Additionally, enhanced tracking and biosecurity
21 measures can be required such as cleaning, washing, or disinfecting vehicles, equipment, or
22 clothing before and after leaving the farm. Special training of Company or contractor personnel

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1 may also be required. Such restrictions can increase the costs of both initial construction and
2 ongoing maintenance, and limit Company's ability to safely operate and maintain its facilities.

3 **Q. Mr. Harding makes several references to [REDACTED] in his direct testimony,**
4 **including stating that ATXI and [REDACTED] had used the same consultant ([REDACTED])**
5 **and same personnel ([REDACTED]). Can you please describe whether ATXI had direct**
6 **knowledge of [REDACTED] routing process and whether it influenced ATXI's Proposed Route?**

7 A. No. ATXI and [REDACTED] were competitors in the bid for the FDIM Project, and
8 therefore completed their own, independent routing evaluations as part of the MISO RFP process.
9 To my knowledge, no staff member from Contract Land Staff, or any other consultant or contractor
10 for Ameren, worked with [REDACTED] in its routing efforts related to the Program. The extent of
11 knowledge that ATXI had regarding [REDACTED] proposed route was obtained via publicly recorded
12 easement options in or around the project area. Prior to finalizing its route selection ATXI acquired
13 county data regarding recorded easement options and identified a number of landowners along
14 ATXI's Proposed Route (DO-28) who had entered into voluntary easement options with [REDACTED]
15 ATXI evaluated this publicly available information and recognized that landowners who had
16 signed voluntary easement options could be considered as demonstrating public acceptance for the
17 Project. This is one of many factors that ATXI considered in its final evaluation and selection of
18 its Proposed Route. However, to restate, the Project team had no direct knowledge from [REDACTED]
19 of its route or routing evaluation.

1 **B. Hiatt**

2 **Q. Can you please describe the route modifications affecting Ms. Hiatt's property**
3 **and the status?**

4 A. In her direct testimony, Ms. Hiatt has proposed a route modification affecting her
5 property, which is depicted as a red dashed line on Exhibit 909 (which I will refer to as "Hiatt
6 Modification"). This route modification would generally involve diverging from ATXI's Proposed
7 Route along Highway 7 to turn east and pass along the eastern property boundary for Ms. Hiatt's
8 property before turning back to the west and continuing north along the Proposed Route.

9 **Q. Has ATXI engaged in discussions with Ms. Hiatt regarding route modifications**
10 **for the FDIM Project?**

11 A. Yes. As Ms. Dettmers notes in her rebuttal testimony, the first communication
12 about the Project from the Hiatt family was the intervention in this proceeding. Upon intervention,
13 ATXI engaged in discussions to obtain information from Ms. Hiatt regarding her concerns related
14 to the proposed route as well as her proposed modifications to the route.

15 **Q. What is ATXI's position on any route modifications for the FDIM Project on**
16 **Ms. Hiatt's property?**

17 A. While technically constructible, the Hiatt Modification would result in a significant
18 cost increase. The proposed route modification would increase the overall length of the line by
19 approximately 1.2 miles and would result in the addition of approximately six medium and/or
20 heavy angle structures. It is anticipated that the costs associated with this route modification would
21 add approximately \$1.7 million in costs to the Project. Further, the proposed route modification
22 moves the proposed transmission line farther from the roadway, which may again result in

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1 increased difficulty related to construction and maintenance access, as well as higher property
2 damages. For those reasons, as well as those outlined in Mr. Nicholas' rebuttal testimony, ATXI
3 continues to support its Proposed Route in this area, and is opposed to the Hiatt Modification.

4 **C. McGinley**

5 **Q. Can you please describe the route modifications affecting Ms. McGinley's**
6 **property and the status?**

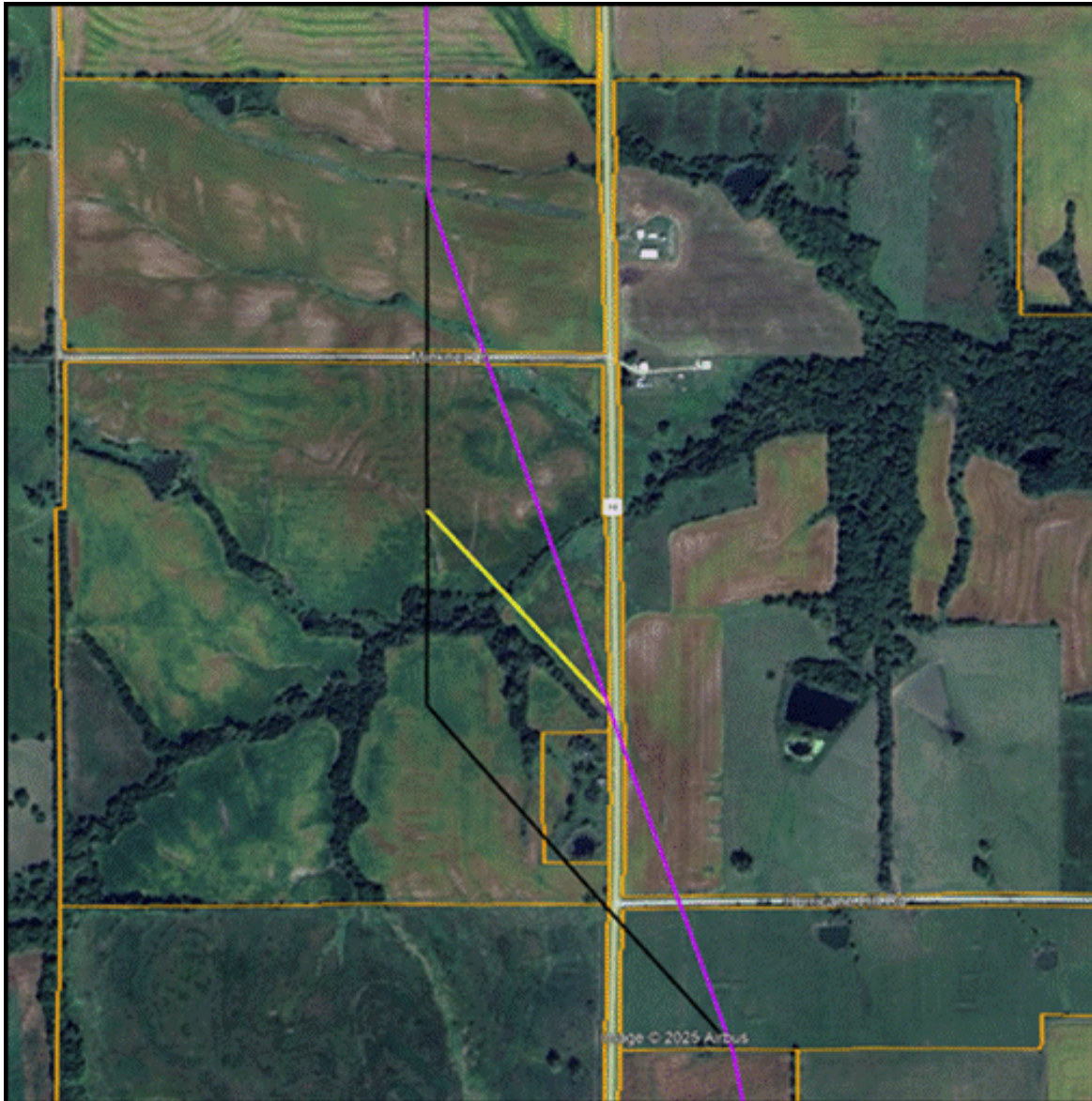
7 A. In her direct testimony, Ms. McGinley has proposed a route modification off of her
8 property, which is depicted as a black line in Schedule MS-4 (which I will refer to as "McGinley
9 Modification 1"). In this area, ATXI's Proposed Route follows parallel on the west side of an
10 existing 69 kV electric line, which is also already located on Ms. McGinley's property. The
11 McGinley Modification 1 diverges from paralleling the existing 69 kV before reaching the
12 McGinley parcel, heading northwest before turning north and rejoining ATXI's Proposed Route.
13 ATXI reviewed the proposal and discovered that it would overhang a landowner and parcel that
14 was not previously notified (due to being outside of the Proposed Route notification corridor), and
15 thus would directly impact a new landowner.

16 **Q. Has ATXI engaged in discussions with Ms. McGinley regarding route**
17 **modifications or adjustments for the FDIM Project?**

18 A. Yes. ATXI and Ms. McGinley agreed on an adjustment to the McGinley
19 Modification 1 to avoid directly impacting this new landowner (which I will refer to as the
20 "McGinley Modification 2"), provided that the landowner to the west would be agreeable to the
21 change from the Proposed Route on their parcel (referred to as the "Murphy Parcel" in Ms.
22 McGinley's direct testimony). The McGinley Modification 2 is generally depicted by a yellow

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1 line in the figure embedded below. ATXI was able to contact the owner or representative of the
2 Murphy Parcel, to discuss the McGinley Modification 2. However, the Murphy Parcel
3 representative was unwilling to agree to any change from the Proposed Route on their property,
4 and therefore ATXI was unable to proceed further with the McGinley Modifications.



1 **Q. What is ATXI's position on any route modifications for the FDIM Project on**
2 **Ms. McGinley's property?**

3 A. ATXI continues to support its Proposed Route in this area. Even if technically
4 constructable, the proposed McGinley modifications pose challenges and risks due to newly
5 impacted landowners who were not previously notified (on McGinley Modification 1) and
6 disagreement from other adjacent landowners to adjust the Proposed Route (on McGinley
7 Modification 2), as explained above. Further, Ms. McGinley's route modification and would
8 introduce the addition of one additional angle structure, thereby increasing the cost of the project.
9 While ATXI continues to support its Proposed Route, in the interest of addressing concerns raised
10 by affected landowners and narrowing contested issues, ATXI would not object to Commission
11 approval of an adjustment or modification of the Proposed Route across Ms. McGinley's property
12 should the Commission deem appropriate. ATXI notes the costs to customers and landowner
13 impacts described above, but would not object to modifications on parcels owned by landowners
14 who received notice of the proceeding.

15 **D. Mathews**

16 **Q. Has Mr. Mathews proposed route adjustments affecting his property?**

17 A. No, Mr. Mathews does directly propose any route modification in his direct
18 testimony. Instead, Mr. Mathews appears to offer an opinion that route DO-27 would be better.

19 **Q. Has ATXI engaged in discussions with Mr. Mathews regarding alternates or**
20 **reroutes for the FDIM Project?**

21 A. Yes. ATXI has engaged in discussions to obtain information from Mr. Mathews
22 regarding his concerns and potential sensitivities or constraints on or near his property. However,

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1 as described above, Mr. Mathews is proposing that the Commission should order a wholesale
2 change to follow a different route such as DO-27.

3 **Q. Mathews claims in his direct testimony that route DO-27 is cheaper than route**
4 **DO-28. Do you agree with this claim?**

5 A. No. ATXI has not developed detailed cost estimates for all of the route segments
6 that were considered. The established routing criteria consider project impacts that influence the
7 overall cost of the project. Several of the most significant factors that are known to directly
8 influence the cost of a transmission line are the overall length of the line and the number of heavy
9 angle structures. A longer transmission line introduces additional costs in the form of increased
10 material costs for support structures, conductor, and hardware; increases the costs associated with
11 property acquisition, due to a larger impacted area; and increases labor costs associated with the
12 installation of additional facilities. Similarly, angle structures are significantly more expensive
13 than tangent structures. Due to the additional loads imparted on angle structures, the size of both
14 the structure and foundation increase significantly. As noted in Schedule JN-D1, preliminary route
15 DO-27 is 2 miles longer and includes 1 additional turning structure (between 15-49 degrees) and
16 two additional structures greater than 50 degrees. Therefore, while DO-28 requires more tree
17 clearing, and crosses additional wet areas, the cost savings associated with reduced line length and
18 reduce angle structures is anticipated to reduce the overall costs of the project.

19 **V. CONCLUSION**

20 **Q. Does this conclude your rebuttal testimony?**

21 A. Yes.

**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.)

File No. EA-2024-0302

AFFIDAVIT

1. My name is Sam Morris. I am a Senior Project Manager in the Transmission Project Management group for Ameren Services Company, which is a subsidiary of Ameren Corporation and an affiliate of Ameren Transmission Company of Illinois, the Applicant in the above-captioned proceeding.

2. I have read the above and foregoing Rebuttal Testimony and the statements contained therein are true and correct to the best of my information, knowledge, and belief.

3. I am authorized to make this statement on behalf of Ameren Transmission Company of Illinois.

4. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Sam Morris
Sam Morris
Senior Project Manager
for Ameren Services Company

On behalf of Ameren Transmission
Company of Illinois

Date: *August 14, 2025*