

**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. relating to)
Transmission Investments in Northwest and)
Northeast Missouri)

File No. EA-2024-0302

STAFF POSITION STATEMENT

COMES NOW, the Staff of the Missouri Public Service Commission, and for its *Position Statement* respectfully states as follows:

1. What concerns, if any, alleged by the intervenor landowners regarding routing and siting issues affecting properties of the intervenor landowners does the Commission have the authority to address, including but not limited to alleged violations of Commission Rule 20 CSR 4240-20.045(6)(K)?¹

While Staff has not developed a specific position in response to any of the intervenor landowner concerns, in general, the Commission has the authority to address any alleged violations by Ameren Transmission Company of Illinois (“ATXI”) of applicable Commission orders, rules, regulations, or statutes under the Commission’s jurisdiction. Staff reserves the right to further develop its position on this issue during the evidentiary hearing and subsequent briefs.

¹ The *Joint List of Issues and Witnesses, Order of Openings, Witness Testimony, and Cross-Examination* filed by the parties on October 10, 2025 incorrectly listed Commission Rule 20 CSR 4240-20.046(6)(K), which does not exist. Commission Rule 20 CSR 4240-20.045(6)(K) is the correct citation.

2. For alleged concerns regarding routing and siting issues affecting properties of the intervenor landowners that the Commission has the authority to address, what relief, if any, is warranted, including any modifications to the route associated with Ameren Transmission Company of Illinois' ("ATXI") application or additional conditions?

While Staff has not developed a specific position in response to any of the intervenor landowner concerns, in general, the Commission has the authority to address and provide relief of any alleged violations by ATXI of applicable Commission orders, rules, regulations, or statutes under the Commission's jurisdiction.

Staff does not recommend any further relief at this time, and believes that the conditions agreed to between Staff and ATXI in the Joint Status Report, filed on March 7, 2025, remedies any alleged deficiencies in ATXI's approach to this CCN case.² Staff reserves the right to further develop its position on this issue during the evidentiary hearing and subsequent briefs.

However, if the Commission were to order one of the alternate routes proposed by landowners in this case, Staff recommends that the Commission consider the three factors outlined by Staff witness Claire Eubanks in her Confidential Surrebuttal Testimony, page 3, lines 1 through 9.

² *Joint Status Report*, EFIS Item 68, Appendix A (March 7, 2025).

Respectfully submitted,

/s/ Eric Vandergriff

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed or hand-delivered, transmitted by facsimile or electronically mailed to all parties and/or counsel of record on this 17th day of October, 2025.

/s/ Eric Vandergriff