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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2024-0302

REBUTTAL TESTIMONY

OF

LEAH DETTMERS

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 Leah Dettmers. My business address is 1901 Chouteau Avenue,
St. Louis, Missouri 63103.

Q. Are you the same Leah Dettmers who submitted direct testimony in this proceeding?

A. Yes.

II. PURPOSE OF THE TESTIMONY AND SCHEDULES

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 witnesses Mark Harding, Rochelle Hiatt, F. Neil Mathews, and Rebecca McGinley. Specifically, my rebuttal testimony covers these three general topics:

- First, I generally respond to allegations and criticisms related to our landowner notification activities on the FDIM Project.
- Next, I provide more detail on how ATXI obtained county-specific tax information to use for purposes of landowner notifications.
- And finally, I explain in further detail the information and mapping reference that were available on the Program website.

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

2 A. Yes. I am sponsoring:

- 3 • Schedule LD-R1 – Mathews Tax Card;
- 4 • Schedule LD-R2 – Mathews Property Record Card;
- 5 • Schedule LD-R3 – Harding Property Record Card;

6 **Q. Are you offering any legal opinions in your rebuttal testimony?**

7 A. No. Although I refer to certain legal requirements related to Phase 1 of the Program

8 as I understand them, I am not an attorney, and my rebuttal testimony is not intended to offer any

9 legal opinions.

10 **III. RESPONSE TO LANDOWNER INTERVENOR TESTIMONY**

11 A. **Landowner Notifications**

12 **Q. Ms. Hiatt testified that her family received the postcard invitation to the April**

13 **9, 2024 open house. (Hiatt Dir., 9:14). She states that "[i]t was not clear that this mailing**

14 **targeted specific landowners, and we assumed this to be a community-wide mailing."**

15 **(Id., 9:20-21). How do you respond to her statement?**

16 A. While we welcome the entire community to engage with ATXI as the Program is

17 being developed, we specifically sent postcard notices for the open houses to landowners whose

18 property could potentially be affected by the Project. The ATXI team needs information specific

19 to properties where the Project may be constructed. As Ms. Hiatt quotes, we invited "landowners"

20 specifically in addition to members of the community and other stakeholders. (Hiatt Dir., 9:17). I

21 am sorry that Ms. Hiatt did not clearly understand that she could be affected by the proposed

22 Project and that her family was unable to attend the in person open house. We typically invite a

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1 large study area of potentially affected landowners to give the team the greatest scope of input
2 from the community as the Project is developed. When landowners engage with ATXI's team,
3 ATXI learns more about the local area, including sensitivities and opportunities related to those
4 specific communities.

5 **Q. Ms. Hiatt describes her family's "experience as lacking information across the**
6 **process to effectively communication concerns/needs in a timely informed way." She further**
7 **says that [t]he purpose of the first forums was not clear to us." She also says that "the date**
8 **of the meetings were not communicated very far in advance." (Hiatt Dir., pp. 10-11). How**
9 **do you respond to her assertions?**

10 A. It is unfortunate that Ms. Hiatt felt that she did not have enough information
11 through the process of ATXI's public engagement and development of the Project. As I described
12 in my Direct Testimony, ATXI's outreach efforts were multi-faceted, including direct mailings and
13 15 paid newspaper ads which ran for 3 weeks before the open houses in four local circulations in
14 the Project area. In both the paid ads and direct mailing to stakeholders, all logistical information
15 for the open houses were clearly stated along with the purpose of the meeting which stated, "We
16 need your input." (ATXI Schedule LD-D1 at pp. 5-8). Ms. Hiatt and her family had the information
17 from the notification postcard and from the Program website to make a telephone call or send an
18 email to the Project team and ask questions or provide information she thought was vital to the
19 development of the Project. Our records indicate that the team received no communication from
20 Ms. or Mr. Hiatt during the public engagement period through October 31, 2024 (ATXI Response
21 to Staff Data Request MPSC 25). According to our records, the first communication about the

Project from the Hiatt family was their intervention in this proceeding. Based upon this intervention response, ATXI's agent, CLS, reached out to the Hiatts on June 6, 2025.

Q. Mr. Mathews makes various claims regarding notifications by ATXI at pages 1 through 3 of his direct testimony. (Mathews Dir., 1:23-25, 2:4-3:14). Can you summarize Mr. Mathew's claims related to notifications by ATXI?

A. Yes. Mr. Mathews claims:

➤ he was "not notified in a timely manner in 2024 when there was a shift in routes from the original DO-27 route to DO-28 route so that [he] could have presented evidence for the records of the PSC and Commissioners at the regional hearings held by ATXI and/or their representatives in Northwest Missouri ...;"

➤ he "originally had been informed by parties in Worth County that the route would be the westerly track known as DO-27 [and] ... relied upon this information from sources inside Worth County that the DO-27 route had been publicly presented as the final route that would be proposed for acceptance by the Missouri Public Service Commission reviewing the application of ATXI for a Certificate of Convenience and Necessity;"

➤ "the records reflect that DO-27 was the one route that had been presented at the regional meetings conducted by ATXI officials and/or their representatives;"

➤ "ATXI ... was not using certified mail to communicate with [him];"

➤ a previous company called NextEra EnergyTransmission Midwest (Stantec), certainly had no problem locating [him] using the USPS mail system when they

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1 were involved in the planning of a transmission line in the area before they
2 abandoned the project;" and

3 ➤ "it appears that ATXI used a third-party online site called Devnet to get addresses
4 which complicates the issue even more."

5 **Q. Does Mr. Mathews specifically claim that he did not receive notifications of the**
6 **open house sessions held in Worth County, Missouri, or of the application filed by ATXI?**

7 A. No. While he references a lack of notification, he does not specifically state that he
8 did not receive the notifications of the Worth County open house sessions or the July 5, 2024,
9 notice of ATXI's application in this proceeding. Also, Mr. Mathews references the parcel
10 identification numbers which were included on the July 5 notice of application, which suggests he
11 received that notice.

12 **Q. Did ATXI send notifications to Mr. Mathews by certified mail?**

13 A. No.

14 **Q. Why not?**

15 A. While I am not a lawyer and am not offering a legal opinion, I am familiar with and
16 was responsible for overseeing ATXI's issuance of notifications to landowners in accordance with
17 20 CSR 4240-20.045(6)(K). While the provisions of that Missouri Public Service Commission
18 (Commission) rule refer to using certified mail if an applicant becomes aware of a person entitled
19 to receive notice of the application to whom applicant did not send such notice, it does not state
20 that certified mail is to be used or refer to the use of certified mail for notices of the county meetings
21 (our open houses) or notices of an application.

1 **Q. What address did ATXI use for the open house and application filing notices**
2 **mailed to Mr. Mathews?**

3 A. Both the open house and application filing notices were mailed to **[REDACTED]

4 [REDACTED] **. ¹

5 **Q. Is that the address for Mr. Mathews stated in the records of the Worth County**
6 **Assessor?**

7 A. Yes. That was the address reflected on the tax card for Mr. Mathew's parcel obtained
8 via the Worth County website at <https://worthmo.devnetwedge.com> in May of 2024. As I will
9 discuss in further detail below, ATXI was pointed to that website by the Worth County Assessor's
10 office in May of 2024 when agents from our real estate contractor went to confirm owner names
11 and addresses for the parcels directly impacted by ATXI's proposed route. A copy of the tax card
12 for Mr. Mathews downloaded by ATXI's consultant in May of 2024 is attached as Schedule LD-
13 R1. I will add that all tax cards for Mr. Mathews for Tax Years 2021 through 2024 available at
14 <https://worthmo.devnetwedge.com> show that same address. We also requested a copy of the
15 underlying Property Record Card (PRC) maintained by the Worth County Assessor for Mr.
16 Mathews' parcel on July 23, 2025. The PRC received directly from the Worth County Assessor's
17 office is attached as Schedule LD-R2 and shows the same **[REDACTED]** address used
18 by ATXI to send notices to Mr. Mathews. That said, if a stakeholder or landowner were to contact
19 us directly with a change of address or mailing preference, we would send notifications to the

¹ As reflected in Application Appendix D Attachment CONFIDENTIAL and Attach 1 CONFIDENTIAL to the Company's Response to Staff Data Request MPSC 0018.0.

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1 requested landowner mailing address and also continue to send the notices to the mailing address
2 on the tax roll card.

3 **Q. Do you agree with Mr. Mathews' claims, which you previously described in**
4 **more detail, that he was not timely notified of a change in routes from DO-27 to DO-28, that**
5 **he had been informed that DO-27 would be the route proposed in this proceeding, and that**
6 **records reflect that DO-27 was presented at the open house.**

7 A. No. Mr. Mathews' claims regarding and understanding of ATXI's routing process
8 and public-facing communications and statements regarding DO-27 and DO-28 are incorrect and,
9 by his own admission, were not based on information he obtained from representatives of ATXI
10 but rather from other undisclosed "parties in Worth County" who told him "that the route would
11 be the westerly track known as DO-27." (Mathews Dir., 2:11-15). He also relied upon incorrect
12 statements by "sources inside Worth County that the DO-27 route had been publicly presented as
13 the final route that would be proposed for acceptance by the Missouri Public Service Commission."
14 (Mathews Dir., 2:13-16). Mr. Mathews unfortunately did not consult with ATXI or any of its
15 public-facing resources regarding this Project. As I discuss further below when discussing the
16 maps used by ATXI in this Project, at no time did ATXI present DO-27 on public-facing materials
17 at the open houses, via any mailings, or on the Program website). ATXI did not file an application
18 with the Missouri PSC to construct the proposed Project along the route known as DO-27. The
19 route options considered by ATXI in arriving at route DO-28 as its proposed route, including route
20 options DO-1 through DO-27, were first mentioned in any publicly available document when
21 ATXI filed its direct testimony and route selection study in this proceeding on July 17, 2024.

1 **Q. Mr. Mathews (Mathews Dir., 3:5-11) and Mr. Harding (Harding Dir., 4:24-28,**
2 **10:2-8) make references to the activities undertaken by **[REDACTED]** pursued this**
3 **competitive Project. Mr. Mathews believes that "the routes were changed and ATXI felt no**
4 **need to locate the newly affected landowners." How do you respond to these claims?**

5 A. Mr. Harding and Mr. Mathews are conflating the activities and decision-making of
6 ****[REDACTED]**** with those of ATXI. I am only generally aware that ****[REDACTED]**** was active in this area related
7 to this project prior to ATXI. ****[REDACTED]**** did not win the bid to build this Project, however. ATXI has
8 undertaken this Project independent of the actions of ****[REDACTED]**** and developed its own study area
9 and potentially affected landowner lists. ATXI's routing plans and public engagement efforts were
10 independent of those of ****[REDACTED]****. I cannot speak to how ****[REDACTED]**** obtained its landowner
11 information or its methods of public engagement and routing. ATXI was under no obligation and
12 had no confirmed routing data to consider the prior actions of ****[REDACTED]****. ATXI did not present to
13 the public any route until ATXI filed its application in this proceeding in which we propose what
14 was identified as route DO-28. The irresponsible and baseless accusation (Harding Dir., 10:3-5)
15 that ****[REDACTED]**** is patently false. ****[REDACTED]****
16 was engaged by ATXI for this Project in 2022; ****[REDACTED]**** work on behalf of ATXI to obtain property
17 records from the counties affected by this project began in 2023. ****[REDACTED]**** is contractually obligated
18 to ATXI for this Project and would not and could not ethically work on behalf of ATXI's competitor
19 for this Project. ****[REDACTED]**** may be involved in other projects across the country for ****[REDACTED]**** and other
20 utilities; such work does not create a conflict of interest related to this Project.

1 **Q. Mr. Mathews suggests that ATXI should survey landowners on DO-28 for**
2 **attitude, concerns and support of the Project using correct addresses and contact**
3 **information. (Mathews Dir., p. 4). What is your response to his suggestion?**

4 A. Essentially, we conducted the sort of exercise that Mr. Mathews is speaking of when
5 we held the open houses and invited landowners who might be affected by the Project to share
6 their information and concerns regarding the Project. Again, we utilized a multi-faceted approach
7 which included in person meetings, a hotline, digital mapping, website and email for community
8 members to connect with us on routing concerns and other Project information. There were many
9 ways for landowners to connect with the Project team at ATXI.

10 **Q. Mr. Harding testifies that he received the invitation for the April 9, 2024 open**
11 **house from ATXI (Harding Dir., p. 3). Mr. Harding admits that he did not attend the open**
12 **house on April 9, 2024, because he held an "assumption that nothing had changed regarding**
13 **the line location." He further asserts that he "only attend[s] meetings if they concern me."**
14 **(Harding Dir., p. 3). Do you know what Mr. Harding means regarding his assumption about**
15 **the line location?**

16 A. It is not clear to what Mr. Harding is referring when he says that "nothing had
17 changed regarding the line location." ATXI had not publicly revealed any specific line route in
18 any materials mailed, online or at the open houses, as I discuss in detail below. Like Mr. Mathews,
19 Mr. Harding appears to rely on incorrect local hearsay rather than on direct communications from
20 ATXI: "I relied upon this information from sources inside Worth County that the DO-27 route that
21 had been publicly presented as the final route that would be proposed for acceptance by the" PSC

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1 (Mathews Dir., p. 2). Mr. Harding held an assumption about a line location that was never published
2 by ATXI.

3 Also, Mr. Harding appears to conflate and confuse, as does Mr. Mathews, the public
4 engagement endeavors or line location of **[REDACTED]**, which did not ultimately win the bid to build
5 this Project. (Harding Dir., 4:25-28). In fact, Mr. Harding asserts, with no justification, that his
6 knowledge of **[REDACTED]s** activities in Worth County "further explains why I never imagined the line
7 could get majorly rerouted as the result of feedback from an open house!" (Harding Dir., 4:32-33).
8 Further, Mr. Harding's erroneous understanding of the value and purpose of feedback from an open
9 house on ATXI's routing process is completely contrary to ATXI public statements and public-
10 facing documents regarding ATXI's great interest in obtaining public input into the routing process.
11 (See, for example, ATXI Schedule LD-D1 at pages 4, 27, 28, 30, 35, 42, 50). ATXI's routing
12 proposals to the PSC are not finalized until after input is received from landowners and other
13 stakeholders at these open house events that Mr. Harding mistakenly presumed he need not attend.

14 **Q. Relatedly, Mr. Harding tells the story of talking to a neighbor regarding said**
15 **neighbor's exchange with ATXI representatives at the April 9, 2024 open house in Grant**
16 **City. (Harding Dir., 7:8-30). How does ATXI regard conversations like this that Mr. Harding**
17 **describes and is also described in the FDIM Routing Study (Schedule JN-D1, p. 29)?**

18 A. Information from landowners such as the location of a residence, outbuildings,
19 environmental sensitivities, ecologically protected areas and species, private airstrips, and other
20 such sensitivities are vital information that ATXI and its team evaluate and weigh with other factors
21 to determine the most favorable route to propose to the PSC.

1 **Q. Mr. Harding claims that he had no opportunity to participate "in line location**
2 **on his property" until after this docket was opened and that he did not find out about "it"**
3 **from ATXI. (Harding Dir., 2:14-16). How do you respond to his assertions?**

4 A. It is hard to understand Mr. Harding's claims given that he confirms he received the
5 open house notification and the notification of filing from ATXI. He had the same access to
6 information and the ATXI team as did other potentially affected landowners. ATXI records indicate
7 that Mr. Harding did not reach out to the Project team until October 2024. Finally, Mr. Harding
8 cites the lack of timely notice to ****[REDACTED]****, as a reason to conclude his property would
9 not be affected. (Harding Dir., 5:4-6). I see no reason for Mr. Harding to conclude that both
10 properties had to be notified for the Project to have an impact on Mr. Harding's property.

11 **Q. Mr. Harding accuses his neighbors of organizing to attend the open house**
12 **apparently to conspire against him and to receive special treatment from ATXI**
13 **representatives (Harding Dir., 9:4-7, 9:30-39, 10:1-33). He also blames these same neighbors**
14 **for not telling the ATXI team about ****[REDACTED]**** house. (Harding Dir.,**
15 **8:21-32). He further believes that only certain neighbors know where the route is and are**
16 **not telling him. (Harding Dir., 11:13-14). Are Mr. Harding's assertions fair or reasonable?**

17 A. No. Mr. Harding wrongly criticizes ATXI and other landowners/stakeholders who,
18 unlike Mr. Harding, took the time to attend the open houses, ask questions, and provide information
19 that would be useful for purposes of developing a final route for the FDIM Project. Also, while I
20 am not an attorney and am not offering a legal opinion, I understand the Missouri Public Service
21 Commission's rules to require a public meeting to be held in each county where 25 or more
22 landowners would be directly affected by a proposed transmission line. Mr. Harding's argument

1 is criticizing ATXI for implementing and other landowners for availing themselves of the process
2 required by the Commission's rule.

3 **Q. How does ATXI approach and view interaction with landowners potentially**
4 **affected by the proposed Project?**

5 A. ATXI welcomes and encourages potentially affected landowners and other
6 stakeholders to provide any and all potentially helpful information to the team to facilitate routing
7 and other design decisions of the Project. Prior to ATXI settling on a route for which it would file
8 its Application, ATXI sought to collect as much information as possible to facilitate that decision.
9 That information was assembled and analyzed to determine the proposed route. If Mr. Harding
10 believes that some of his neighbors know more information about the Project than he knows, I
11 believe it could be a possibility that they are informed about the Project because they attended the
12 open houses and received information or contacted the ATXI team directly. That said, if his
13 neighbors did attend the open house or contact us directly, the team would indicate to them during
14 this time period and at all open houses, before filing a proposed route, that the maps represent a
15 study area and no routes are final or determined until PSC approval. These open house and online
16 maps used in public engagement contain the following disclaimer.

17 "DISCLAIMER: The information provided on this map is for
18 discussion purposes only. Ameren Transmission Company of
19 Illinois (ATXI), Missouri Joint Municipal Electric Utility
20 Commission (MJMEUC) and Ameren Missouri are not bound in
21 any way to the representations reflected on this map. This map
22 does not represent a final determination by ATXI, MJMEUC, and
23 Ameren Missouri as to route selection, and Ameren ATXI,
24 MJMEUC, and Ameren Missouri are not restricted or barred from
25 modifying or deviating from the routes proposed, or considering
26 new or different routes. Missouri Public Service Commission
27 (MoPSC) Staff or other parties may propose new or modified

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1 routes. All routes are subject to change pending MoPSC
2 approval."

3 **Q. Mr. Harding refers to the notification of filing letters that were sent on July 5**
4 **by ATXI as "a form letter" (Harding Dir., 3:28). He is concerned that several other**
5 **landowners received the same letter and claims that it "serve[d] to add confusion rather than**
6 **clarity" (Harding at 4, lines 3-6; 16-22). Can you explain the purpose of this letter that Mr.**
7 **Harding and several other landowners were sent on July 5, 2024?**

8 A. Yes. It is true that the letter follows a particular form and was sent to many
9 landowners. While I am not an attorney, as the Stakeholder Relations Manager I am responsible
10 for carrying out, as I understand them, ATXI's obligations under Missouri Administrative Code to
11 send notice to landowners affected by a proposed route filed with the PSC. Commission Rule
12 4240-20.045(6)(K)(1) provides that "land is directly affected if a permanent easement or other
13 permanent property interest would be obtained over all or any portion of the land or if the land
14 contains a habitable structure that would be within three hundred (300) feet of the centerline of an
15 electric transmission line." Pursuant to this requirement, as I described in my Direct Testimony,
16 ATXI sent notice to 128 unique landowners for a total of 192 distinct parcels that are affected by
17 the Phase 1 Projects (FDIM and MMRX) that are the subject of this proceeding. All of these
18 landowners own property within 300 feet of the proposed center lines of the Projects (Dettmers
19 Dir., p. 20). For Mr. Harding and his neighbors who received the letter, the proposed center line
20 will either cross their property directly or be located within 300 feet of their property.

21 **Q. Ms. McGinley (McGinley Dir., 7:13-20; 8:1-4; 14:11-13) and Mr. Harding**
22 **(Harding Dir., 10:24-29) commented on what appeared to them to be a different process in**

1 **ATXI engagement with landowners after an application is filed. Can you explain why**
2 **landowner engagement differs prior to ATXI filing an application and post-application?**

3 A. Prior to filing its application, ATXI sought as much public input as possible to
4 facilitate the decision-making process on a route to file with the PSC. Once the proposed route is
5 filed with the PSC, however, affected landowners are notified pursuant to PSC regulations of this
6 filing. Certainly, as a result of proceedings before the PSC some change in the route can occur.
7 However, it is difficult to change that route without justification as the proposed route is typically
8 chosen because it is determined to be the most favorable route given the information available to
9 ATXI. ATXI seeks to work with affected landowners to mitigate the impact of the line on their
10 property during this process and in real estate acquisition, but various considerations such as cost
11 and impact on other landowners must be considered as well, as ATXI witness Mr. Morris describes
12 in his rebuttal testimony.

13 **B. Tax Parcel Information**

14 **Q. Mr. Harding makes various assertions regarding how and whether ATXI**
15 **contacted the Worth County Assessor's Office in May 2024 to obtain updated landowner**
16 **information within 60 days of the expected filing of the Application in this proceeding. He**
17 **claims there is "zero evidence that ATXI gathered any records from the Worth County**
18 **Assessor's Office on May 21-22, 2024." He also cites a communication from a previous Worth**
19 **County Assessor to the Office of Public Council (OPC) that "there is no evidence or record**
20 **of nor any memory of ATXI or its consultants gathering records from that office." He further**
21 **says there is "no record in the Worth County Treasurers Office for any purchase of any**

1 **records from ATXI or its Consultants on any date close to May 21-22, 2024." (Harding Dir.,**
2 **12:10-23). How do you respond to these broad and serious charges he is making?**

3 A. Before I respond I would like to observe that this is one of several allegations that
4 Mr. Harding has made by inaccurately connecting selected data points to fit his narrative of ATXI's
5 alleged malfeasance because he chose not to attend our open house. While Mr. Harding's charges
6 are serious -- as his claims imply that ATXI did not comply with the requirement to provide notice
7 of its application to directly impacted owners as stated in the records of the county assessor's office
8 within 60 days of sending the notice² -- they are not correct. ATXI's consultants were directed to
9 devnetwedge.com by the Worth County Assessor's Office. (ATXI Response to Harding Data
10 Request No.'s 2 & 4). Acquiring information from devnetwedge.com did not cost our consultants
11 anything, so there is no receipt to document this acquisition of parcel data. The Worth County
12 Assessor's office, if they recall having talked with CLS representatives, would not necessarily have
13 known at the time that CLS was acting on behalf of ATXI for this Project and would have little
14 reason to connect CLS's work to ATXI and this Project. This account of our consultant's actions is
15 corroborated by the Worth County Assessor's email to OPC in which the Worth County Assessor
16 acknowledged that Worth County was directing information requests to the devnetwedge.com
17 website until October 2024. The Assessor discontinued that practice because it took away a source
18 of revenue for the county, and it did not provide a paper trail for entities that needed one. (See
19 Attachment 11 to The Office of the Public Counsel's *Response to Staff's Recommendations and*
20 *List of Concerns*, filed March 7, 2025 (EFIS Item No. 69)).

² The requirements Mr. Harding refers to in his testimony are not the same as those stated in the Commissions rule, 20 CSR 4240-20.045(6)(K)(a). The rule states that notice is to be provided to "owners of land, or their designee, as stated in the records of the county assessor's office, on a date not more than sixty (60) days prior to the date the notice is sent, who would be directly affected by the requested certificate."

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1 This information also rebuts Mr. Mathews' claims that "Devnet," as he calls it, is a third
2 party website and that ATXI's use of it to obtain landowner information "complicate[d] the issue
3 even more and "led to miscommunication." (Mathews Dir., 3:11-13). Devnetwedge.com is used
4 by many county tax assessors across the country, including Worth County, MO. ATXI's consultants
5 followed the Worth County Assessor's direction to this site to obtain updated landowner
6 information in May 2024 for the notification of filing letters sent on July 5, 2024.

7 **Q. Mr. Harding claims that ATXI did not use proper tax parcel numbers.**
8 **(Harding Dir., 3:32-35). He claims that "mayhem" in the community began with ATXI's**
9 **"failure to get current addresses to notify people (Harding Dir., 11:32-34). Mr. Mathews**
10 **similarly asserts that there was "misinformation and confusion" with the ATXI application**
11 **because the Worth County Assessor has adopted 2 sets of parcel numbers, "a parcel number**
12 **and an alternate number." He further claims that ATXI did not conduct due diligence.**
13 **(Mathews at 2:20-23). Did the Worth County change in parcel numbering lead to errors in**
14 **ATXI notifications sent to affected landowners?**

15 **A.** No. The parcel identification numbers used in ATXI's July 5 notifications are valid
16 parcel numbers utilized in the records of the Worth County Assessor. As explained in ATXI
17 Response to Harding Data Request No. 19, I generally understand that those parcel numbers
18 represent the Missouri Uniform Parcel Numbering System standard³ (which are also shown on
19 Worth County devnetwedge.com records as alternate parcel numbers, or APNs). I understand that
20 Worth County also uses a parcel number (PN) system which is a variation of the Uniform Parcel

³ The numbering system identifies the County, Map Township, Map Area, Section, and individual Parcel numbers but does not identify Quarter Section or Map Block numbers reflecting, to the best of ATXI's understanding, that Worth County does not use maps containing Quarter Section or Map Block numbers at this time.

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1 Numbering system which presents the same parcel numbers in a different format by dropping the
2 county (CNTY) number, keeping map township (TWP), map area (AREA), section (SEC), and
3 parcel (Parcel) numbers, and adding fields for the quarter section ($\frac{1}{4}$ SEC) and map block (BLK)
4 numbers (which ATXI understands do not exist at this time in Worth County and are entered as
5 zeros), and adopting uniform display formatting for each number component of the parcel
6 number. Given this information, I am not aware of anything that would lead to the belief that the
7 parcel numbers in the July 5 notice of filing are invalid or no longer used by the Worth County
8 Assessor. For consistency in the property records database ATXI was using for the FDIM Project,
9 ATXI used the established APN parcel identification number format in its July 2024 mailing to
10 affected landowners. I understand the PN format only recently started being utilized in Worth
11 County in connection with recent computer system upgrades (such as the Worth County
12 devnetwedge.com records). Moreover, as indicated above, ATXI recently obtained Mr. Harding's
13 and Mr. Mathews' own Property Record Cards directly from the Worth County Assessor's office.
14 Those cards contain the APN numbers utilized on ATXI's notices, as shown in Schedule LD-R2
15 and Schedule LD-R3.

16 **Q. Mr. Harding purports to call into question the notice of application ATXI sent**
17 **to certain other landowners, referencing the notice sent to **[REDACTED]**.**
18 **(Harding Dir., pp. 12-13). What is your response to these assertions?**

19 A. First, as I previously explained, ATXI obtained and used the name and address for
20 this parcel as stated in the records of the Worth County Assessor's office through
21 worthmo.devnetwedge.com. The notice of application was mailed to landowners on July 5, 2024,
22 which is a date 60 days after Monday, May 6, 2024 (the oldest date falling within the 60 day

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1 window under the rule for assessor's office records used to identify the names and addresses of
2 directly impacted landowners to receive notice of an application). I note that, even per the
3 assertions in Mr. Harding's testimony, this means **[REDACTED]** was the owner as
4 stated in the records of the Worth County Assessor's office on a date within the 60 day window.

5 **Q. Mr. Harding also raises questions with respect to certain parcels for which**
6 **ATXI did not send a notice on July 5, 2024 with respect to landowners **[REDACTED]**
7 **[REDACTED] **. (Harding Dir., p. 13).**

8 **What is your response to these assertions?**

9 A. Both of the parcels for these owners involved a split of an existing parcel which
10 ATXI did not know had occurred. The parent parcels still existed, so when ATXI obtained updated
11 information for these parcels the information obtained did not indicate there had been a change.
12 When ATXI became aware of these new parcels and landowners it sent notice via certified mail at
13 that time in accordance with the Commission's rule.

14 **Q. Several of the Landowner Intervenor witnesses with property in Worth**
15 **County have made assertions or raised issues regarding ATXI's notices of its open houses**
16 **and application filing and the landowner name and address information obtained to issue**
17 **those notices. Can you please explain the process and steps undertaken by ATXI and its**
18 **consultants to develop and maintain up to date Worth County landowner information related**
19 **to this Project?**

20 A. In response to Mr. Harding's Data Request No. 4, ATXI provided the following
21 detailed description of the process ATXI and its consultants undertook over 2023-2024 to obtain

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1 and maintain up-to-date names and mailing addresses of affected landowners for the open house
2 and application filing notices:

3 One of ATXI's consultants maintains a GIS database for the FDIM Project
4 containing various information regarding tax parcels in the study area for the
5 project, including parcels directly affected by the route proposed by ATXI in its
6 application. ATXI's consultant obtained parcel information from the Worth
7 County Assessor's office between February 2023 and April 2023, and uploaded
8 relevant parcel information to its database for the FDIM Project at that time. This
9 was an iterative process throughout the routing and public engagement phases,
10 from multiple sources all derived from county records. This data was updated
11 from time to time as new or additional information came to the attention of ATXI
12 or its consultant. In March of 2024, ATXI's consultant updated its data base with
13 Worth County Assessor information obtained through CoreLogic, a third-party
14 vendor, who obtains parcel data and property owner information from county
15 records. The updated database information was used for purposes of notification
16 to landowners in Worth County for the open houses in Grant City on April 9,
17 2024. As explained in ATXI's Response to MPSC 0022.0, "ATXI's consultants
18 queried each county assessor's office again [on the dates indicated] to generate a
19 list of landowners whose property is directly affected by, or within 300 feet of,
20 the Proposed Route, to provide notification of the filing of the application on ...
21 [the dates indicated]." As indicated in Response to Data Request Harding 2, the
22 Worth County Assessor's office directed ATXI's consultants to the
23 worthmo.devnetwedge.com website which was used to obtain assessor's office
24 records and information, including landowner information, for tax parcels in
25 Worth County, Missouri. All of this data was used to update ATXI's consultant's
26 database, which was then used for purposes of notifications to landowners of the
27 application issued on July 5, 2024."

28 (ATXI Response to Harding DR No. 4).

29 The process undertaken by ATXI's consultants for the Projects at issue in this proceeding
30 is depicted in the table below:

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FDIM/MMRX PROJECTS LANDOWNER PARCEL DATA PULLS

County	PRE-MISO BID				OPEN HOUSE NOTIFICATION				NOTIFICATION of FILING		
	Date Queried/ Acquired	Vintage of Data	Method for Obtaining Data		Date Queried/ Acquired ¹	Vintage of Data ²	Method for Obtaining Data		Date Queried/ Acquired ³	Vintage of Data	Method for Obtaining Data
Worth	February-April 2023 ⁴	County data provided as of the time data was loaded to flash drive	Sent flash drives via mail to Worth Co. Assessor office to obtain countywide parcel cards. ⁵		March 2024	May 9, 2023	Corelogic, a third party vendor. Data directly obtained from county assessors ⁶		May 21, 2024 & May 22, 2024		Devnetwedge, used by county assessors, with information free to the public ⁷
Gentry	February-April 2023	County data provided as of the time data was loaded to flash drive	Sent flash drives via mail to Gentry Co. Assessor office to obtain countywide parcel cards		March 2024	June 7, 2022	Corelogic, a third party vendor. Data directly obtained from county assessors		May 23, 2024 & May 24, 2024		2023 tax card data from Gentry County as provided by Assessor office
Dekalb	February-April 2023	County data provided as of the time data was loaded to flash drive	Sent flash drives via mail to Dekalb Co. Assessor office to obtain countywide parcel cards		March 2024	Nov 11, 2023	Corelogic, a third party vendor. Data directly obtained from county assessors		May 21, 2024		Assessor Summary Report Dekalb County as provided by Assessor office
Marion	N/A	N/A	N/A		March 2024	4Q 2023 ⁸	Corelogic, a third party vendor. Data directly obtained from county assessors		May 15, 2024		Utilized online records available at https://marion.missouriassessors.com/search.php

¹ ATXI Response to OPC Data Request No. 12. ATXI Response to Harding Data Request No. 4.

² ATX Response to MPSC Data Request 22.1. ATXI Response to OPC Data Request No. 12.

³ ATXI Response to MPSC Data Request No. 22.1 for all counties.

⁴ ATXI Response to Harding Data Requests No. 4 & No. 16.

⁵ OPC Response, Attachments 4, 5 & 6 confirm and document CLS purchase of data 3/3/2023. OPC Response, Attachment 4 confirms Worth Co updates in July each year and certifies between Sept & Nov each year.

⁶ ATXI Response to Harding Data Request No. 4. OPC Response, Attachment 4 confirms Corelogic purchase of Worth County data on 9/6/2023.

⁷ ATXI Response to Harding Data Request No. 2 & No. 4. As of October 2024, Worth Co. no longer refers requests to this site because it is lost revenue for the county and does not provide users with a paper trail. See Attachment 11 of OPC Response (March 7, 2025).

⁸ Direct Testimony of Leah Dettmers at p 6.

Q. You have worked on planning and directing public engagement in support of Ameren transmission projects for about a decade. How would you generally describe your experience with obtaining timely and accurate landowner and parcel information from the counties in which Ameren entities, including ATXI, have undertaken transmission projects?

A. In my decade of experience in supporting Ameren transmission projects, I have observed that many of the smaller population, rural counties where we often develop projects tend to have more limited financial, labor and technological resources to establish and maintain an up-to-date digital or online source of landowner and parcel information from which to draw our list

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1 of landowners to invite to open houses and to notify affected landowners of an application.
2 Updates to such data, especially in counties with more limited resources, may be infrequent and
3 are unlikely to be updated in real time. The data that we obtain is a snapshot at a particular moment
4 in time and continually changes. Furthermore, documentation of parcel splits or land partitions,
5 such as the land transaction between Mr. Harding and **[REDACTED]**, requires updated GIS
6 data which may not be captured along with property sales. An example of the limited resources
7 of small counties has arisen in another pending project where we waited a month to obtain updated
8 landowner information from the county assessor for purposes of sending a required notification.
9 My description of these common circumstances in small rural counties is not intended to be a
10 criticism of them but merely an observation of the reality of the situation in counties with limited
11 resources.

12 **C. Mapping Information**

13 **Q. Mr. Harding asserts that he could determine from the map on the open house**
14 **invitation that "it didn't include any of my property within that map." (Harding Dir., 3:9-**
15 **10). He also said that "[i]t would be unreasonable to conclude anything else" other than that**
16 **"the line was going as depicted by the skinny line on the map that was advertised." (Harding**
17 **Dir., 4:35-37). Mr. Harding further claimed that he could tell that the closest DO-27 could**
18 **be to his property was on the extreme northwest corner which could have a guy wire.**
19 **(Harding Dir., 3:12-14). Was the map of Worth County contained in the open house**

1 **invitations and paid ads announcing the open houses designed to enable one to determine the**
2 **precise route of the Project?**

3 A. No. Given the small scale of the map in question it is nearly impossible to identify
4 with certainty the precise area of the Project and which parcels it would cross. Again, the map
5 shown did not depict any centerline or specific route for the transmission line. It was simply a map
6 to depict the localized area that could be affected by the Project. Landowners who received the
7 invitation were explicitly invited to attend the open house to provide input to guide ATXI's routing
8 process. Moreover, Mr. Harding's assertion that he could determine from the maps that a specific
9 parcel would have a guy wire is questionable because none of these maps showed a specific route
10 much less any possible placement of structures. In fact, Mr. Harding's statement indicates a lack
11 of understanding of the Project as the structures will be steel poles and not involve guy wires at
12 all.

13 Regarding the "skinny line" between the two study area rectangles, it is our practice to
14 notify the full study area beyond any corridors under consideration. ATXI also seeks to obtain
15 broad feedback from the community. A shift in the line could occur as a result of input from public
16 engagement as has occurred in this case. ATXI undertook these actions in good faith. The purpose
17 of the public engagement process, as I have discussed, is to gather information from the community
18 to help us to minimize sensitivities and optimize opportunities when feasible related to this
19 transmission Project. Furthermore, as I discuss below, maps used at the open houses and online
20 contain the map disclaimer language.

21 **Q. Mr. Harding claims that the map ATXI employed in its public outreach was**
22 **"the exact same map" that ** [REDACTED] ** used in its public outreach (Harding Dir. at 4, lines 27-28).**

1 **Did ATXI's public engagement for the FDIM Project rely on the map used by **[REDACTED]** for**
2 **the same project?**

3 A. No. While Mr. Harding does not specify precisely what map he is referring to, I
4 presume him to mean the small Worth County or FDIM 3 county maps ATXI used in mailings, ads
5 and other materials. I have no knowledge of the routing maps used by **[REDACTED]**. Our routing
6 consultants at TRC developed these maps for ATXI's use in public engagement. ATXI's
7 consultants did not coordinate with **[REDACTED]**, as ATXI and **[REDACTED]** were in competition to be
8 awarded this Project.

9 **Q. Mr. Mathews claims that "the records reflect that DO-27 was the one route that**
10 **had been represented at the regional meetings conducted by ATXI officials and their**
11 **representatives" (Mathews at 2, lines 17-19). Does the record in this proceeding reflect that**
12 **ATXI presented DO-27 at its public meetings for this project?**

13 A. No. This is another incorrect claim by Mr. Mathews. In fact, ATXI responded to
14 several data requests from Staff and OPC that neither DO-27, DO-28, nor any other routes were
15 presented on public-facing materials at the open houses, online, or in mailed materials or
16 advertisements. *See e.g.,* ATXI Responses to: MPSC Data Request No. 0020.1; OPC Data Request
17 No. 0016.0(b); OPC Data Request 0020.0(C); OPC Data Request No. 0020.1; and OPC Data
18 Request No. 0022. No specific transmission route selection was presented within any of the public
19 material during this public engagement time period. Further, as discussed above all maps at the
20 open houses and online contained the following disclaimer:

21 "DISCLAIMER: The information provided on this map is for
22 discussion purposes only. Ameren Transmission Company of
23 Illinois (ATXI), Missouri Joint Municipal Electric Utility
24 Commission (MJMEUC) and Ameren Missouri are not bound in

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1 any way to the representations reflected on this map. This map
2 does not represent a final determination by ATXI, MJMEUC, and
3 Ameren Missouri as to route selection, and Ameren ATXI,
4 MJMEUC, and Ameren Missouri are not restricted or barred from
5 modifying or deviating from the routes proposed, or considering
6 new or different routes. Missouri Public Service Commission
7 (MoPSC) Staff or other parties may propose new or modified
8 routes. All routes are subject to change pending MoPSC
9 approval."

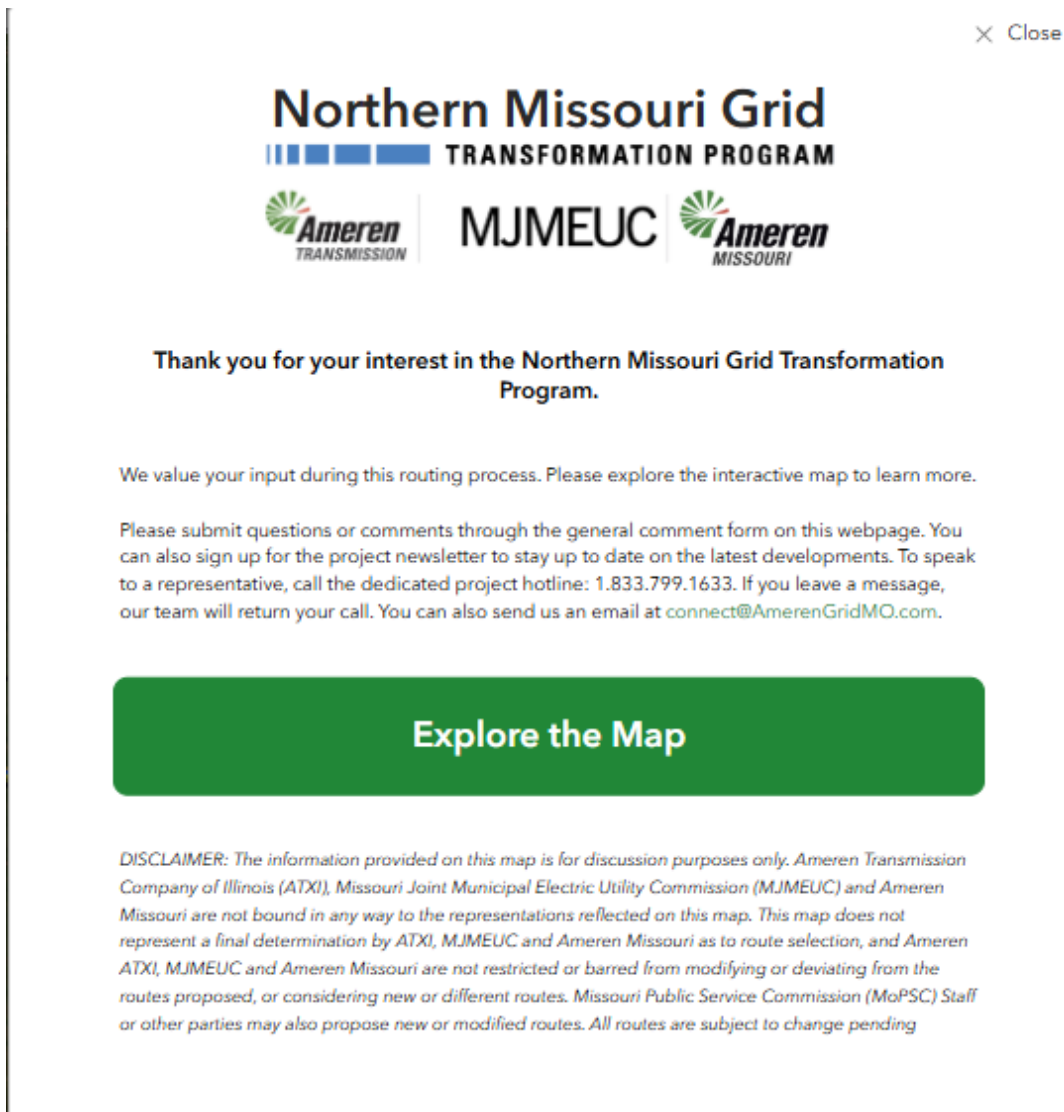
10 **Q. Mr. Harding claims that through data request responses, ATXI "admit[ted]**
11 **they didn't have any maps displayed other than the same old skinny line/orange rectangle**
12 **map" from May 14, 2024 through July 16, 2025 (Harding Dir., 12:3-7). How do you respond**
13 **to Mr. Harding's assertions?**

14 A. I stated in my Direct Testimony that the interactive map was available during the
15 public engagement period from April 8 through April 26, 2024. (Dettmers Dir., p. 13). The open
16 house invitation also notified recipients of the interactive map availability dates. (Schedule LD-
17 D1, p. 4). The team nonetheless tabulated public engagement via the website, email and other
18 virtual sources through June 1, 2024. (Dettmers Dir., p. 14). As per PSC staff Recommendation
19 Number 14 in this proceeding, ATXI has re-activated the interactive map with the comment feature
20 and posted the route alternative (DO-27) discussed in testimony on the interactive map.

21 **Q. Ms. Hiatt explained that, since her family was out of town during the April 9,**
22 **2024, open house in Grant City, they visited the Program website. While they found "some**
23 **information," she says they "did not find interactive maps different from the map in the**
24 **flyer." (Hiatt Dir., 9:23, 10:1). Mr. Harding similarly states that he only saw maps like those**

1 **in the postcard invitation to the open house. (Harding Dir., 3:8, 9). How do you respond to**
2 **Ms. Hiatt's and Mr. Harding's assertions?**

3 A. As I discussed above, ATXI made the interactive map available during the public
4 engagement period from April 5 to April 26, 2024. Unfortunately, it appears that the interactive
5 map may have been difficult for some people to find and access. In fact, PSC staff recommends in
6 Condition 15 that ATXI be required to provide "instructions for accessing the website and maps
7 referenced in Condition 14 on all required notifications sent to affected landowners." (Appendix
8 A, Joint Status Report filed by ATXI on behalf of parties March 7, 2025). That being stated, Mr.
9 Harding admits to reviewing the map online (Harding Dir., 3:7, 24), which held an information
10 box – Explore Map- that clearly indicates ATXI and other entities are not bound by these maps
11 which are for discussion purposes only and do not represent a final determination as to route
12 selection. Furthermore, as shown below, the interactive map pop-up feature also states that visitors
13 can contact the Project via the hotline or email.



1

2 **D. Other Issues**

3 **Q. Mr. Harding refers to activity logs of public engagement contacts produced in**
4 **response to Staff data requests and suggests that the absence of a statement in an activity log**
5 **means it did not occur. (Harding Dir., p. 7). Is this a reasonable or fair use or inference from**
6 **the activity logs?**

7 **A. No, it is not. The intent of the activity logs is to make a record of all direct**
8 **communications to and from the Project team via telephone, email, mail, or in person meetings.**

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1 However, for larger public meetings such as an open house, it is not feasible to make a record of
2 every communication with every attendee. An effort is made to make a record of communications
3 providing substantive information, such as the existence of a building or the location of drain tile.
4 And certain stations at an open house – such as the GIS station -- are set up to record and make a
5 record of the information received. But the activity logs are not a transcript of all communications,
6 particularly at an open house. It would not be reasonable to infer or suggest that the absence of a
7 communication at an open house in an activity log means or suggests it did not occur.

8 **IV. CONCLUSION**

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

10 **A. Yes.**