

**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)	Case No. EA-2024-0302
393.170.1, RSMo. relating to)	
Transmission Investment in)	
Northwest and Northeast Missouri)	

THE OFFICE OF THE PUBLIC COUNSEL’S STATEMENT OF POSITION

COMES NOW the Office of the Public Counsel (“OPC” or “Public Counsel”)

and for its *Statement of Position*, 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 4240-20.04[5](6)(K)?¹

The affected landowners’ concerns fall into two camps: 1) the proximity of Ameren Transmission Company of Illinois’ (“ATXI’s”) proposed transmission route to their home and 2) ATXI’s failure to meet the notification requirements in 20 CSR 4240-20.045(6)(K). Missouri law grants the Public Service Commission (“Commission”) the authority to “impose such condition or conditions at it may deem reasonable and necessary” on applications for a certificate of convenience and necessity (“CCN”).² Using that stated authority, the Commission promulgated the rule defining the notice requirements a utility requesting a CCN to meet.³ Therefore, the Commission’s authority expands to both of the cited landowner concerns.

¹ The original *List of Issues* erroneously referred to 20 CSR 4240-20.046, which does not exist in Missouri regulation.

² Section 393.170.3, RSMo.

³ Rule 20 CSR 4240-20.045

However, its remedies are limited by ensuring the due process and property rights of other potentially impacted landowners are not violated.

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 the OPC does not take a position on this issue at this time, it reserves the right to do so after the close of evidence.

WHEREFORE, the OPC respectfully files its *Statement of Position* for the Commission's consideration.

By: /s/ Anna Kathryn Martin
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CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this Seventeenth (17th) Day of October, 2025.

/s/ Anna Martin