

**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)	File No. EA-2024-0302
Under Section 393.170.1, RSMo Relating)	
to Transmission Investments in Northwest)	
and Northeast Missouri)	

MCGINLEY-KRAWCZYK FARMS, LLC’S POSITION STATEMENT

McGinley-Krawczyk Farms, LLC (“McGinley”), and files its Position Statement in response to the Commission’s *Order Regarding Amending Procedural Schedule* of September 9, 2025 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)?

McGinley’s Position: The Commission has the authority to address concerns raised by McGinley-Krawczyk Farms, LLC. Section 393.170.3, RSMo, authorizes the Commission to “impose such condition or conditions at it may deem reasonable and necessary” on applications for a certificate of convenience and necessity (“CCN”).

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?

McGinley's Position:

The Commission should order route modifications and impose conditions that prioritize protection of the McGinley occupied family residence. Specifically, the Commission should:

- 1. Require ATXI to Accept McGinley's Alternate Route: The Commission should mandate ATXI implement the McGinley modification that places transmission lines at least 1,000 feet from the McGinley residences. ATXI witness Sam Morris conditionally accepted this approach, stating ATXI "would not object to Commission approval" of route adjustments on parcels owned by properly noticed landowners.**
- 2. Impose Structure Placement Assurance: The Commission should prohibit ATXI from placing any transmission structures on parcel 10-05-16-06 to minimize impacts on the residential parcel.**

The requested modifications are technically feasible (ATXI acknowledges constructability), would add minimal distance (approximately 150 feet), and serve critical public interests by:

- Protecting an occupied family residence with young children from proximity to high-voltage infrastructure;**
- Preventing property devaluation specifically associated with transmission line proximity to residences; and**
- Addressing health and safety concerns regarding exposure for vulnerable populations.**

ATXI's own rebuttal testimony indicates willingness to accept Commission-ordered modifications on properly noticed parcels, removing any technical impediment to this relief. The Commission should exercise its authority to ensure routing decisions reflect appropriate priorities: occupied homes before vacant land, landowner rights before operational convenience.

Respectfully submitted,

ELLINGER BELL LLC

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served upon all of the parties of record or their counsel, pursuant to the Service List maintained by the Data Center of the Missouri Public Service Commission on October 17, 2025.

/s/ Stephanie S. Bell