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) <u>File No. EA-2024-0302</u>
Section 393.170.1, RSMo. relating to)
Transmission Investments in Northwest and)
Northeast Missouri)

KEVIN AND ROCHELLE HIATT STATEMENT OF POSITION

COME NOW Kevin and Rochelle Hiatt and hereby set forth their statement of position in this matter:

1. Issue Presented: 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)?

The Commission has the authority to set line routes for lines, and has the authority to "impose such condition or conditions at it may deem reasonable and necessary" or to reject a CCN application if there is not an acceptable route for such line. Similarly, the Commission has the authority to address violations of Commission Rule 20 CSR 4240-20.045(6)(K), including by rejecting the CCN application for non-compliance.

2. Issue Presented: 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?

It is warranted for the Commission to require Ameren to re-route the line to the eastern

boundary of the Hiatt property as requested by the Hiatts and set forth in Exhibit 909 to their direct

testimony. The line as currently proposed will run very close to the Hiatts' home, but also avoid

their property by remaining just west of their property line. This effectively hits the Hiatts with a

double blow of both very close and noxious proximity of the line, but without an opportunity to

even be paid via condemnation for the inconvenience and nuisance caused to their property and

home by the proposed line. This is clearly unreasonable, and is not necessary or convenient for the

public service.

For these reasons, the Hiatts request that any CCN issued by the Commission in this matter

require ATXI to construct the line as requested by the Hiatts

Respectfully submitted,

/s/ Brent E. Haden

Brent E. Haden, Mo. Bar No. 54148

Haden & Colbert, LLC

827 E. Broadway

P.O. Box 7166

Columbia, MO 65201

Phone: (573) 442-3535

Fax: (888) 632-7775

e-mail: brent@showmelaw.com

Attorney for Kevin and Rochelle Hiatt

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/ Brent E. Haden

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