

Exhibit:
Issue(s): *Route Selection*
Witness: *Claire M. Eubanks, P.E.*
Sponsoring Party: *MoPSC Staff*
Type of Exhibit: *Corrected Surrebuttal*
Testimony
Case No.: *EA-2024-0302*
Date Testimony Prepared: *October 22, 2025*

MISSOURI PUBLIC SERVICE COMMISSION

INDUSTRY ANALYSIS DIVISION

ENGINEERING ANALYSIS DEPARTMENT

CORRECTED SURREBUTTAL TESTIMONY

OF

CLAIRE M. EUBANKS, P.E.

AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2024-0302

Jefferson City, Missouri
October 2025

1 **CORRECTED SURREBUTTAL TESTIMONY**

2 **OF**

3 **CLAIRE M. EUBANKS, P.E.**

4 **AMEREN TRANSMISSION COMPANY OF ILLINOIS**

5 **CASE NO. EA-2024-0302**
6

7 Q. Please state your name and business address.

8 A. Claire M. Eubanks and my business address is Missouri Public Service
9 Commission, P.O. Box 360, Jefferson City, Missouri, 65102.

10 Q. By whom are you employed and in what capacity?

11 A. I am employed by the Missouri Public Service Commission (“Commission”)
12 as the Manager of the Engineering Analysis Department, Industry Analysis Department,
13 Commission Staff Division.

14 Q. Are you the same Claire M. Eubanks that previously contributed to Staff’s
15 recommendation in this case?

16 A. Yes.

17 Q. What is the purpose of your surrebuttal testimony?

18 A. I respond to the rebuttal testimony of Ameren Transmission Company of Illinois
19 (“ATXI”) witnesses Sam Morris and James Nicholas regarding the various route options
20 available to the Commission.

ROUTE SELECTION

Q. Please explain Staff's position regarding the Phase 1 Projects.¹

A. Staff supports the Phase 1 Projects with certain conditions. In applying the Tartan criteria, Staff found 1) the Project is needed; 2) ATXI is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project; 3) ATXI has the financial ability to undertake the Project; and 4) the Project is economically feasible. Staff considers the evaluation of the separate Tartan criteria and whether, on balance, the project promotes the public interest. In its December 20, 2024, recommendation, Staff recommended various conditions related to right-of-way acquisition and micro-siting; reporting requirements; and landowner communications for current and future projects. ATXI, Staff, and several parties to this case reached an agreement on limited revisions to Staff's recommended conditions. Consistent with Staff's experience with transmission CCN cases similar to the present case, and to ensure the Project is in the public interest, Staff recommends the conditions contained in schedule CME-s1 be imposed by Commission order.

Q. What is Staff's position on the various routes proposed by landowners and ATXI in this case?

A. Several modifications discussed by ATXI in the rebuttal testimony of Sam Morris in response to landowner proposals in this case appear feasible. Staff intends to prepare a summary of proposed options based on the testimony of ATXI and landowners for the Commission's reference after additional discovery is complete.² Staff recommends that the Commission consider the following in its decision:

¹ Fairport to Denny to Iowa/Missouri Border ("FDIM") Project refers to the Missouri 16 portion of the Orient – Denny - Fairport route. The Maywood to Mississippi River Crossing Project 17 ("MMRX") Project refers to the Missouri portion of the Maywood - Meredosia route.

² See Schedule CME-s3.

1 1. Modifications that directly affect³ landowners who were not notified of the CCN
2 application prior to the April 18, 2025, intervention deadline should not be considered
3 by the Commission.

4 2. While cost impact is always a concern, ATXI estimates its total cost to construct the
5 Phase 1 Projects is \$120.5 million.⁴ Staff does not object to modifications, or combinations of
6 modifications, that together are anticipated to be less than approximately 1% to 2% of the total
7 estimated cost.

8 3. Where feasible, routing paths along existing roads, transmission corridors,
9 and property lines is good practice as it minimizes land impact.

10 Q. Regarding the selection of DO-28 as the proposed route, James Nicholas,
11 consultant for ATXI, notes that one factor ATXI considered was a hog farm on the south side
12 of 230th Road west of Highway N,⁵ further representing that “TRC was made aware of such
13 restrictions and properly considered the hog farm property a constraint.”⁶ Did Staff request
14 information from ATXI or its consultants regarding the specific access restrictions
15 for this property?

16 A. Yes. In response to Staff data request 12.2 ATXI represented that it “does not
17 have documentation available for this specific facility because it elected to avoid routing FDM
18 on the hog farm property.” In response to Staff data request 12.3, ATXI stated “Other than as
19 indicated in ATXI's response to MPSC Staff DR 0012.0, ATXI or its consultants have not had
20 communications with the property owners or representatives/facility managers of the hog farm,

³ Per 20 CSR 4240-20.045(5)(K)1., “[L]and is directly affected if a permanent easement or other permanent property interest would be obtained over all or any portion of the land or if the land contains a habitable structure that would be within three hundred (300) feet of the centerline of an electric transmission line.”

⁴ Application, paragraph 36.

⁵ James Nicholas rebuttal testimony, page 3, lines 13-14.

⁶ James Nicholas rebuttal testimony, page 10, lines 19-20. TRC Companies, Inc. (“TRC”) is a consultant for ATXI.

Corrected Surrebuttal Testimony of
Claire M. Eubanks, PE

1 and do not have records of contact from or with the property owners or representatives/facility
2 managers of the hog farm.” Schedule CME-s2 provides the data request responses related to
3 the hog farm property.

4 Q. Does this conclude your surrebuttal testimony?

5 A. Yes it does.

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)

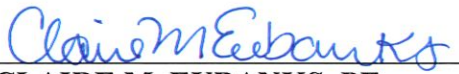
Case No. EA-2024-0302

AFFIDAVIT OF CLAIRE M. EUBANKS, PE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW CLAIRE M. EUBANKS, PE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Corrected Surrebuttal Testimony of Claire M. Eubanks, PE*; and that the same is true and correct according to her best knowledge and belief.

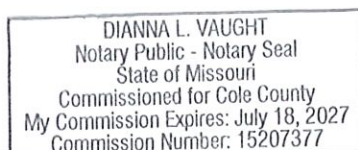
Further the Affiant sayeth not.

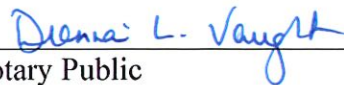


CLAIRE M. EUBANKS, PE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 22nd day of October 2025.





Notary Public

Staff Proposed Conditions with ATXI/Staff Agreed Revisions

Right-of-way Acquisition and Micro-siting

- 1) Throughout the right-of-way acquisition process, ATXI will use all reasonable efforts to follow the route(s) depicted in Attachment E of the Application. But ATXI will be allowed to deviate from the depicted route in two scenarios:
 - a. First, if surveys or testing do not necessitate a deviation, ATXI may deviate from the depicted route on a particular parcel if ATXI and each landowner on which the deviation will run agree. Either ATXI or landowner may initiate such a request to deviate.
 - b. Second, if ATXI determines that surveys or testing require a deviation, ATXI will negotiate in good faith with each affected landowner and if agreement can be reached, ATXI may deviate from the depicted route on the affected parcel(s), as agreed with the affected landowner(s).

With respect to any parcel other than the identified parcels where ATXI desires to locate the line, whether because testing or surveys necessitate acquisition of an easement on that parcel or for other reasons (e.g., a request from adjacent landowners), ATXI will negotiate in good faith with the landowner of each affected parcel over which ATXI has determined an easement is needed or desired and, if agreement is reached, may deviate from the depicted route by locating the line on the affected parcel(s) but will notify the Commission of the deviation and parcels affected prior to construction on that parcel.

If testing or surveys necessitate acquisition of an easement on such other parcel(s) and agreement is not reached, despite good faith negotiations, ATXI will file a request with the Commission to allow it to deviate from the depicted route onto the affected parcel(s) and shall, concurrently with the filing of its request with the Commission, send a copy of its request to the owner(s) of record of the affected parcel(s) via U.S. Mail, postage prepaid, as shown by the County Assessor's records in the county where the affected parcel is located, or at such other address that has been provided to ATXI by the owner(s). ATXI shall fully explain in that request why ATXI determined the change in route is needed and file supporting testimony with its request and the name(s) and addresses of the owner(s) to whom it provided a copy of its request. After Commission notice of the opportunity for a hearing on the issue of whether the change in route should be approved is given to the owner, Staff and OPC, and after an opportunity to respond, the Commission will grant or deny the request.

- 2) Absent a voluntary agreement for the purchase of the property rights, the transmission line shall not be located so that a residential structure currently occupied by the property owners will be removed or located in the easement, including for electrical code compliance purposes.

- 3) Prior to the commencement of construction on a parcel, ATXI will secure an easement, which will include a surveyed legal description showing the precise dimension, including the length and width, for the permanent transmission line easement area for each affected parcel. In addition, ATXI will track each easement grant by way of a spreadsheet that identifies each parcel by Grantor and County, and which contains the recording information for each parcel. Upon securing all necessary easements for the Project, ATXI will file a copy of the spreadsheet with the Commission, to which a map will be attached. For each parcel, the map and the spreadsheet will include a unique indicator that allows the Commission to see where on the map that parcel is located.
- 4) ATXI shall follow the construction, clearing, maintenance, repair, and right-of-way practices set out in Schedule TG-D4 filed with Tara Green's Direct Testimony.

Reporting requirements

- 5) ATXI shall file with the Commission in this case a legal description of the line segments when acquisition of the necessary land rights is finalized.¹
- 6) ATXI shall file the final Joint Use Assessment ("JUA") with the Commission in this case within 30 days of executing the agreement.
- 7) ATXI shall obtain all required government approvals and permits—e.g., any applicable land disturbance permits, Missouri State Highway Commission permits, or US Army Corps of Engineers permits— before beginning construction on the part of the Projects (FDIM and MMRX) where the approvals and permits are required, and shall file such approvals and permits with the Commission before beginning construction or, for approvals and permits obtained less than 90 days before beginning construction, within 90 days of receipt.
- 8) ATXI shall file with the Commission any agreement between ATXI and the pipeline companies that have assets being crossed by the Projects (FDIM and MMRX). The FDIM and MMRX routes do not parallel pipelines.
- 9) ATXI shall file with the Commission the annual report it files with FERC.
- 10) ATXI shall file any vegetation management filing made to FERC, NERC, or a regional reliability organization in EFIS as a non-case related filing.²

¹ Proposed descriptions are included in the Direct Testimony of Tara Green, Schedule TG-D1 and TG-D2.

² 20 CSR 4240-23.030(5).

- 11) ATXI shall obtain acknowledgement from Ameren Missouri that they remain bound by the following provision from the 4th Order Modifying the 2012 Report and Order in Case No. EO-2011-0128 with respect to the transmission facilities to be constructed as part of the Projects (FDIM and MMRX):

For transmission facilities located in Ameren Missouri's certificated service territory that are constructed by an Ameren affiliate and that are subject to regional cost allocation by MISO, for ratemaking purposes in Missouri, the costs allocated to Ameren Missouri by MISO shall be adjusted by an amount equal to the difference between:

- (I) The annual revenue requirement for such facilities that would have resulted if Ameren Missouri's Commission-authorized ROE and capital structure had been applied and there had been no construction work in progress (CWIP) (if applicable), or other FERC Transmission Rate Incentives, including Abandoned Plant Recovery, recovery on a current basis instead of capitalizing pre-commercial operations expenses and accelerated depreciation, applied to such facilities and
- (II) The annual FERC-authorized revenue requirement for such facilities. The ratemaking treatment established in this provision will, unless otherwise agreed or ordered, continue as long as Ameren Missouri's transmission system remains under MISO's functional control.

Landowner communication for current and future projects

- 12) Staff and ATXI acknowledge the Commission retains the authority to reopen this docket based on the outcome of the proceeding for Phase 2 of the Program. This condition shall not restrict ATXI's ability to exercise the authority granted in the CCN for the Phase 1 Projects, including engineering, environmental permitting, easement acquisition, right-of-way clearing, access, and line or substation construction until such time as the Commission reaches a determination with respect to Phase 2 of the Program, or thereafter assuming Phase 2 is approved. ATXI acknowledges that Staff may recommend any conditions or take any position it deems necessary in its recommendation regarding the Phase 2 program.
- 13) Staff recommends the Commission grant the CCN, subject to another virtual local public hearing for those landowners in the re-route area of DO-27 to DO-28 (generally between the corner of Highway N and Kent Lane to County Road 249), providing an opportunity to those landowners to express their concerns, if any, on the route.
- 14) ATXI shall, for all future transmission line projects in Missouri which require a CCN and also require a public meeting pursuant to 20 CSR 4240-20.045(K)(3), develop and maintain, using best efforts, route maps on its website(s) showing preferred and alternative routes that are known at that time and still under active consideration by the ATXI, as well as any related study areas. These maps shall include satellite imagery in sufficient detail

for affected landowners to locate their property. These maps shall be maintained from at least the date of any public meeting(s) held, when required, and shall display preferred and known alternative routes proposed in its application or discussed in its written testimony from the date an application is filed through the effective date of the Commission's Report and Order ruling on the subject CCN application (CCN Order) or the date ATXI discontinues development of the project, whichever occurs first. If public meetings are not required to be held, ATXI shall post maps beginning on the date it provides notice of the application to affected landowners. This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.

- 15) ATXI shall, for all projects referenced in Condition 14, include instructions for accessing the website and maps referenced in Condition 14 on all required notifications sent to affected landowners. This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.
- 16) ATXI shall, for all projects referenced in Conditions 14 and 15, refresh its data used to comply with 20 CSR 4240-20.045(6)(K)1 that identifies the owners of land directly affected by the requested certificate, including the preferred route and any known alternative route, and entitled to receive notice of its application. The refresh of the data shall be conducted within 90 days after filing an application for a CCN to confirm the identified parcels and owners of land directly affected by the requested certificate as of the date notice of the application was issued pursuant to 20 CSR 4240-20.045(6)(K)(1) and (2). If such refresh identifies a person entitled to receive notice of the application to whom ATXI did not send such notice, ATXI shall provide a notice to such person(s) in accordance with 20 CSR 4240-20.045(6)(K)(4). This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.

Ameren Transmission Company of Illinois
Response to MPSC's Data Request - MPSC 1
LRTP Missouri 1 (EA-2024-0302)

Dated Submitted: September 30, 2024

No.: MPSC1 0012.0

Please provide if ATXI has contacted the USDA-regulated hog farm mentioned on page 29 in schedule JN-D1 (FDIM Routing Study) regarding planned route DO-28. If so please provide a record of any correspondence.

RESPONSE

Prepared By: Leah Dettmers
Title: Stakeholder Relations & Training Manager
Phone No.: 314-366-1848
Date: September 30, 2024

On March 20, 2024, ATXI mailed notification of the FDIM Project to the property owner and informed them of the open houses in Worth County (held on April 9, 2024) and Gentry County (held on April 10, 2024). Please see Schedule LD-D1 at 3-4, attached to the direct testimony of Leah Dettmers, for the template letters/invites mailed to landowners.

On July 5, 2024, the property owner was mailed notice of ATXI's Application for a certificate of convenience and necessity for the Projects, which notified the landowner that the subject property is along the route for the proposed Projects. Please see MPSC 12.0 Attach 1 for the notices that were mailed to this landowner. Please see also Schedule LD-D1 at 70-72 for the template of this letter and attached maps.

To date, ATXI does not have any other records of contact from or with the property owners of the hog farm. It is worth noting that the parcels in question were determined to be adjacent to parcels within 300 feet of the proposed centerline of the Projects' proposed transmission lines but were not themselves within 300 feet of the proposed centerline. As a result, ATXI has had no further contact with this property owner related to the FDIM Project, and does not expect it will require an easement or access to this property for construction of the FDIM Project.

July 5, 2024

KC2 Real Estate, LLC
PO Box 856
Warsaw, North Carolina 28398
MO-GE-091.200.ADJ
02-02-10-01
Gentry

RE: Notice of Application – Ameren Transmission Company of Illinois (ATXI) - Northern Missouri Grid Transformation Program: Fairport-Denny-Iowa/Missouri border (FDIM) Project and Maywood-Mississippi River Crossing (MMRX) Project

Dear Sir or Madam:

ATXI recognizes the importance of keeping stakeholders informed about projects that will affect them. You are receiving this letter because public records show that you own property along the route of new transmission lines that ATXI is proposing to develop.

Specifically, those records indicate that you own property along the route of the FDIM Project, a new, approximately 44-mile 345 kV transmission line that ATXI will construct in Worth, Gentry and DeKalb counties, or its one new substation in DeKalb county, or the route of the MMRX Project, a new or rebuilt, approximately 9-mile 345 kV transmission line that ATXI will construct in Marion County. Attached for your review is a project map.

In the coming days, ATXI will submit an application to the Missouri Public Service Commission (PSC) for a Certificate of Convenience and Necessity and other necessary approvals for the FDIM and MMRX Projects. The expected timing for a PSC decision is mid-year 2025.

If approved by the PSC, easement negotiations will begin in with affected landowners mid-year 2025 with construction anticipated to start in 2026. Our goal is to have this project in service by mid-year 2028 and providing benefits to the communities, including – improving local and regional energy reliability, supporting lower energy supply costs, and promoting access to diverse energy sources.

Should you have questions about the proposed route or would like to share additional information about your property, please contact the project team at 1.833.799.1633, by email at Connect@AmerenMOGrid.com or visit the project website at Ameren.com/AmerenGridMO.com to learn more about this project. If you have questions for the Missouri Public Service Commission please call 573.751.3234 or for the Office of the Public Counsel, please call 573.751.4857.

Public collaboration remains a top priority for our team and we appreciate your participation throughout our engagement process. Thank you for your time and feedback as we develop this important program to ensure safe, reliable and affordable energy for Northern Missouri.

Sincerely,



Tracy Dencker
Senior Project Manager, ATXI

July 5, 2024

KC2 Real Estate, LLC
PO Box 856
Warsaw, North Carolina 28398
MO-GE-094.200.ADJ
02-02-03-02
Gentry

RE: Notice of Application – Ameren Transmission Company of Illinois (ATXI) - Northern Missouri Grid Transformation Program: Fairport-Denny-Iowa/Missouri border (FDIM) Project and Maywood-Mississippi River Crossing (MMRX) Project

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Public collaboration remains a top priority for our team and we appreciate your participation throughout our engagement process. Thank you for your time and feedback as we develop this important program to ensure safe, reliable and affordable energy for Northern Missouri.

Sincerely,



Tracy Dencker
Senior Project Manager, ATXI

Ameren Transmission Company of Illinois's
Response to MPSC Data Request - MPSC 1
LRTP Missouri 1 (EA-2024-0302)

No.: 0012.1

Regarding the hog-farm discussed at page 29 of TRC's FDIM routing study and page 21 of James Nicholas' direct testimony. 1. TRC and James Nicholas indicates the hog farm facility is located southeast of the intersection of Highway N and 230th road. Please confirm that the hog farm is located to the southwest of the intersection of Highway N and 230th road. 2. Please identify all parcels associated with the hog farm facility.

RESPONSE

Prepared By: James Nicholas

Title: TRC Companies, Inc. – VP of National Energy Siting and Permitting

Phone No.: 513-235-9654

Date: 12/19/2024

1. The hog farm facility is located to the southwest of the intersection of Highway N and 230th Road.
2. Please see MPSC 12.1 Attach.

Ameren Transmission Company of Illinois's
Response to MPSC Data Request - MPSC 1
LRTP Missouri 1 (EA-2024-0302)

No.: 0012.3

In response to data request 12, ATXI states: “ATXI does not have any other records of contact from or with the property owners of the hog farm”. Does ATXI or its consultants have records of contact from or with the property owners or representatives/facility managers of the hog farm? If so, please provide.

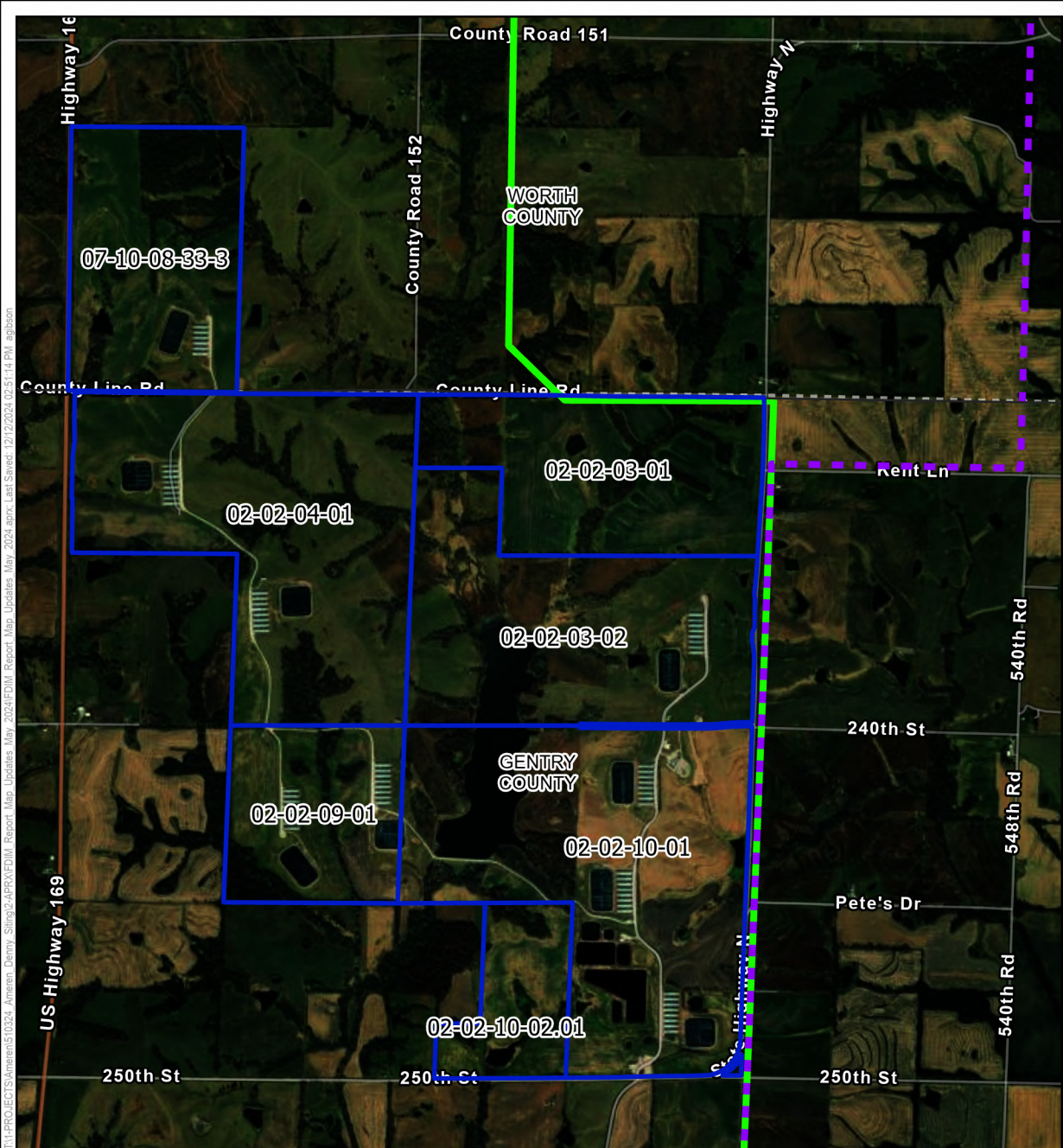
RESPONSE

Prepared By: Leah Dettmers

Title: Manager of Stakeholder Relations & Training

Phone No.: 314-366-1848

Other than as indicated in ATXI's response to MPSC Staff DR 0012.0, ATXI or its consultants have not had communications with the property owners or representatives/facility managers of the hog farm, and do not have records of contact from or with the property owners or representatives/facility managers of the hog farm.



DECEMBER 2024



- HOG FARM PARCELS
- COUNTY BOUNDARY
- NEW PROPOSED ROUTE DO-28
- ORIGINAL PROPOSED ROUTE DO-27



Case No. EA-2024-0302
Schedule CME-s2
Page 6 of 10

1:30,000 1" = 2,500 feet

Ameren Transmission Company of Illinois's
Response to MPSC Data Request - MPSC 1
LRTP Missouri 1 (EA-2024-0302)

No.: 0036.0

Provide the date ATXI selected DO-28 as its preferred route for the FDIM line segment.

RESPONSE

Prepared By: James Nicholas

Title: TRC Companies, Inc. – VP of National Energy Siting and Permitting

Phone No.: 513-235-9654

Date: 12/19/2024

Route option numbered DO-28 was selected as the Proposed Route for the FDIM Project on or around May 14, 2024.

Ameren Transmission Company of Illinois's
Response to MPSC Data Request - MPSC 1
LRTP Missouri 1 (EA-2024-0302)

No.: 0012.2

Regarding the hog farm discussed at page 29 of TRC's FDIM routing study. TRC states: "This presented access issues both for construction and ongoing line maintenance, as the facility restricts access due to contamination concerns." Provide all documentation available to ATXI or its consultant that supports the statement that the facility restricts access.

RESPONSE

Prepared By: Tracy Dencker
Title: Senior Project Manager
Phone No.: 314-861-4790

ATXI does not have documentation available for this specific facility because it elected to avoid routing FDIM on the hog farm property. However, ATXI is aware of the heavily regulated nature of the animal agricultural industry and facilities engaged in livestock production. Strict measures can be implemented and are typically in place to protect the health and wellness of animals and humans, prevent disease and biological hazards, reduce impacts on quality of water and air, and to ensure the safety of the food supply. Property used for large livestock production facilities, Animal Feeding Operations (AFO) or Concentrated Animal Feeding Operations (CAFO), is likely to require the Company to follow procedures to minimize or reduce the introduction or spread of hazards that could affect the health and wellness of the animals, people, and environment, which would limit Company's ability to safely operate and maintain the line. The Proposed Route for the FDIM Project avoids the risk by avoiding the hog farm.

For example, AFOs and CAFOs can, and typically do, have restrictive access requirements, such as requiring advance notice to access the property, limited entry points, limiting or restricting the number of outside visitors to the farm, and documenting/record keeping of visitors. They can also place limitations on the location and movement of vehicles and equipment, and may require monitoring or escort by farm personnel.

Additionally, enhanced tracking and biosecurity measures can be required such as cleaning, washing, or disinfecting vehicles, equipment, or clothing before and after leaving the farm. Training of Company or contractor personnel may also be required.

Current or former waste lagoons present on the property pose environmental, health, and safety concerns, and can present a challenge for design (structure spotting) and construction (access and excavation for structure installation).

Below is a list of sources/resources that identify guidelines and best practices for the swine and pork supply industry:

1. United States Department of Agriculture – Swine Industry Manual:
https://www.aphis.usda.gov/sites/default/files/swine_industry_manual.pdf
2. Missouri Department of Agriculture – Secure Pork Supply Plan:
<https://agriculture.mo.gov/animals/health/pdf/secure-pork-supply-brochure.pdf>
3. Secure Pork Supply Plan for Continuity of Business:
https://www.securepork.org/Resources/Secure-Pork-Supply_Plan_for_COB.pdf

Ameren Transmission Company of Illinois
Response to MPSC 's Data Request
LRTP Missouri 1 (EA-2024-0302)

No.: 0012.3

In response to data request 12, ATXI states: “ATXI does not have any other records of contact from or with the property owners of the hog farm”. Does ATXI or its consultants have records of contact from or with the property owners or representatives/facility managers of the hog farm? If so, please provide.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Date.)

Prepared By: Leah Dettmers

Title: Manager of Stakeholder Relations & Training

Phone No.: 314-366-1848

Other than as indicated in ATXI's response to MPSC Staff DR 0012.0, ATXI or its consultants have not had communications with the property owners or representatives/facility managers of the hog farm, and do not have records of contact from or with the property owners or representatives/facility managers of the hog farm.

	New affected landowner that did not receive notice of the CCN application prior to April 18, 2025?	Cost impact as compared to DO-28?	Where feasible, routed along roads, corridors, or property lines?
Harding Modification 1	Yes ¹	Not estimated, anticipated to be more expensive than the proposed route. ²	No ³
Harding Modification 2	Yes ⁴	\$800,000 ⁵	Yes ⁶
Harding Modification 3	Yes ⁷	\$300,000 - \$500,000 ⁸	Yes ⁹
Harding Modification 4	Yes ¹⁰	Similar cost to Harding Modification 1 ¹¹	Yes ¹²

¹ Response to Staff data request 54.

² Response to Staff data request 54.

³ Sam Morris rebuttal, page 8, lines 11-13. Confidential response to Staff data request 57 Attachment 1 (map).

⁴ Response to Staff data request 54.

⁵ Sam Morris rebuttal page 9, line 2.

⁶ Confidential response to Staff data request 57 Attachment 1 (map).

⁷ Response to Staff data request 54.

⁸ Response to Staff data request 54.

⁹ Confidential response to Staff data request 57 Attachment 1 (map).

¹⁰ Response to Staff data request 59

¹¹ ATXI response to Staff data request 59.

¹² Confidential response to Staff data request 57 Attachment 1 (map).

	New affected landowner(s) that did not receive notice of the CCN application prior to April 18, 2025?	Cost impact as compared to DO-28?	Where feasible, routed along roads, corridors, or property lines?
Hiatt Modification	No ¹³	\$1,700,000 ¹⁴	No ¹⁵
McGinley Modification 1	Yes ¹⁶	Increase ¹⁷	No ¹⁸
McGinley Modification 2	No ¹⁹	Increase ²⁰	No ²¹
DO-27	Yes. However, ATXI sent notice of an LPH in response to Commission order. ²²	Increase ²³	Yes ²⁴

¹³ Response to Staff data request 55.

¹⁴ Sam Morris rebuttal page 12, line 21.

¹⁵ Sam Morris rebuttal page 12, lines 21-22.

¹⁶ Sam Morris rebuttal page 13, line 13-14.

¹⁷ Sam Morris page 15, line 8.

¹⁸ Sam Morris rebuttal page 13, line 11. Response to Staff data request 57. Attachment 2 (map).

¹⁹ Sam Morris page 13, line 19.

²⁰ Sam Morris page 15, line 8.

²¹ Response to Staff data request 57. Attachment 3 (map).

²² EA-2024-0302, ATXI Status Report filed January 13, 2025, EFIS Item 54.

²³ Sam Morris page 16, line 14-16.

²⁴ Schedule JN-D1, Page 22 of 54.

Ameren Transmission Company of Illinois
Response to MPSC's Data Request - MPSC
EA-2024-0302

Application of ATXI for a Certificate of Convenience and Necessity under Section 393.170.1,
RSMo. relating to Transmission Investments in Northwest and Northeast Missouri
Dated Submitted: August 22, 2025

No.: MPSC 0050

Please clarify which alternative route (DO-27, DO-28, etc.) the McGinley-Krawczyk Farms, LLC Property is directly affected by. Physical address is 3752 State Highway H, Darlington, Missouri 64438. Land is directly affected if a permanent easement or other permanent property interest would be obtained over all or any portion of the land or if the land contains a habitable structure that would be within three hundred (300) feet of the centerline of an electric transmission line.

RESPONSE

Prepared By: James Nicholas

Title: TRC Companies, Inc. – VP of National Energy Siting and Permitting

Phone No.: 513-235-9654

The corridor/alignment for DO-27 and the Proposed Route (DO-28) are the same in this area, so there is no difference in impact on McGinley's property between them.

Ameren Transmission Company of Illinois
Response to MPSC's Data Request - MPSC
EA-2024-0302

Application of ATXI for a Certificate of Convenience and Necessity under Section 393.170.1,
RSMo. relating to Transmission Investments in Northwest and Northeast Missouri
Dated Submitted: September 08, 2025

No.: MPSC 0054

1) Does Harding Modification 1, Harding Modification 2, and Harding Modification 3, as referred to in Sam Morris' direct testimony, affect landowner(s) that did not receive notice prior to April 18, 2025? If so, provide the parcel numbers and describe the affect for each modification separately. 2) What is the cost impact of Harding Modification 1 as compared to DO-28? 3) What is the cost impact of Harding Modification 3 as compared to DO-28?

RESPONSE

Prepared By: Sam Morris

Title: Senior Manager, Major Projects, Ameren Services Company

Phone No.: 314-861-4819

- 1) The route adjustments identified as Harding Modification 1, Harding Modification 2, and Harding Modification 3 in the rebuttal testimony of ATXI witness Sam Morris, represent route adjustments proposed or identified by Mr. Harding in his testimony or attachments to his testimony, with Harding Modification 3 including an ATXI suggested modification to Harding Modification 2 for a portion of the proposed adjustment located fully within the borders of property owned by Mr. Harding. Since these route adjustments represent the proposals of someone other than ATXI, ATXI does not know the precise centerline of the route adjustment intended by the party making these proposals. ATXI's responses to this data request reflect and are based on its understanding of the identified route adjustments proposed by others. This question asks ATXI whether the referenced modifications "affect landowner(s) that did not receive notice prior to April 18, 2025." ATXI understands "affect" as used in this question to have the same meaning as the definition of "directly affected" contained in 20 CSR 4240-20.045(6)(K). Similarly, ATXI understands the "notice" as used in this question to refer to the notice of an application referenced in 20 CSR 4240-20.045(6)(K). The data request does not specify what period of time should be used for identifying the owner of the affected land. ATXI understands the data request to refer to owners of the affected land on a date not more than sixty (60) days prior to July 5, 2024.

Harding Modification 1:

Harding Modification 1 (as defined in ATXI's rebuttal testimony) affects the owners of land who were not directly affected by ATXI's proposed route in its application and, as a result, ATXI did not notify the owners of those parcels of its application. The parcel

numbers and effect of the route adjustment on such parcels, based on ATXI's understanding of Harding Modification 1, are as follows:

<u>Parcel Number</u>	<u>How Parcel Affected by Route Adjustment</u>
07-07-07-36-1	The line would run along the full length of the western border of this parcel.
07-07-07-36-2	Depending on exact placement of centerline intended by the proposed modification, parcel potentially affected along the full length of its eastern border.
07-07-07-25-5	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel.
07-07-07-25-2.01	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel.
07-07-07-25-1	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel. The line would then be located on the next parcel to the north. There may be some portion of the ROW for the line which would over property located along the northern border of this parcel from the point where it exists the property to the eastern border of the parcel,
07-07-06-24-2	The line would enter and run along the southern border of the parcel to the east border of the parcel for less than half length of the southern border of the parcel.
07-08-04-19-1	The line would run along the full length of the southern border of this parcel.
07-08-09-30-2	ATXI does not believe this parcel would be directly affected by the route adjustment because the 150' ROW should be located fully within the next parcel to the north and there are no habitable structures on this parcel to ATXI's knowledge within 300' of the centerline of the proposed adjustment. However, it is possible that after conducting an actual survey of this area some portion of the 150' ROW could extend over the northern border of this parcel.

ATXI also notes that while the owner of parcel number 07-07-07-36-5 was provided notice of ATXI's application, Harding Modification 1 would move the location of the line on this parcel and increase the length of the line on this parcel from approximately 700

feet across the southeast corner of the parcel to more than 2,600 feet from the southern to the northern border of this parcel.

Harding Modification 2:

Harding Modification 2 affects an owner of land who was not directly affected by ATXI's proposed route in its application and, as a result, ATXI did not notify the owner of that parcel of its application. The parcel number and effect of the route adjustment on such parcel, based on ATXI's understanding of Harding Modification 2, are as follows:

<u>Parcel Number</u>	<u>How Parcel Affected by Route Adjustment</u>
07-08-09-30-4	ATXI understands that the ROW for the line (but not the centerline of the line) would extend across the southeast corner of this parcel.

ATXI also notes that while the owner of parcel number 07-08-09-31-2 was provided notice of ATXI's application, Harding Modification 2 would move the location of the line on this parcel and increase the length of the line on this parcel from approximately 1,450 feet across the southeast portion of the parcel to more than 2,500 feet from the southern to the northern border of this parcel.

Harding Modification 3:

Please see the response for Harding Modification 2. As noted above, Harding Modification 3 included an ATXI suggested modification to Harding Modification 2 for a portion of the proposed adjustment located fully within the borders of property owned by Mr. Harding. Thus, the response for Harding Modification 3 is the same as the response for Harding Modification 2.

Note: ATXI has received Staff data request MPSC 59.0 which identifies another modification proposed by Mark Harding (depicted in EFIS Item No. 47 in docket EA-2024-0302, on page 1 of Exhibit 2 of the Albany, MO local public hearing). For ease of reference and consistency with the numbering/naming convention used in ATXI's rebuttal testimony, we have identified this additional modification as "Harding Modification 4." It is also included and depicted in the map attached to Staff data request MPSC 57.0 file "MPSC 57.0 Attach 1 (CONFIDENTIAL)."

- 2) ATXI has not estimated the costs associated with Harding Modification 1. An accurate cost estimate would require more detailed design, which may be influenced by conversations with landowners who would be affected in a new or different way. However, to facilitate evaluation, ATXI notes that it appears that Harding Modification 1 would increase the overall length of the line by approximately 0.75 miles. Due to the increased length of the circuit, it is estimated that Harding Modification 1 would require 3-5 additional tangent structures. Generally, the number of angle structures appears to be relatively comparable. Harding Modification 1 would increase the angle of two structures from approximately 45-60 degrees to 90 degrees, which can significantly increase the costs associated with construction. It does appear that Harding Modification 1 may allow

the reduction or elimination of one light or medium angle structure. However, given the increased overall length of the circuit, increased number of structures, and increased turning angle on structures, ATXI estimates that Harding Modification 1 would be more expensive than the proposed route. I would further note that a number of factors including changes to construction access, tree clearing, geotechnical conditions, and specifics related to wire pulling activities have not been reviewed.

- 3) Harding Modification 3 requires an additional heavy angle structure and approximately 2-3 additional medium angle structures depending upon final configuration and structure spotting. ATXI has estimated that the cost for this design change is likely between \$300,000 and \$500,000.

Ameren Transmission Company of Illinois
Response to MPSC's Data Request - MPSC
EA-2024-0302

Application of ATXI for a Certificate of Convenience and Necessity under Section 393.170.1,
RSMo. relating to Transmission Investments in Northwest and Northeast Missouri
Dated Submitted: September 05, 2025

No.: MPSC 0055

1) Does the Hiatt Modification, as referred to in Sam Morris' direct testimony, affect landowner(s) that did not receive notice prior to April 18, 2025? If so, provide the parcel numbers and describe the affect.

RESPONSE

Prepared By: Sam Morris

Title: Senior Manager, Major Projects, Ameren Services Company

Phone No.: 314-861-4819

The route adjustments identified as the Hiatt Modification represents a route adjustment proposed or identified on behalf of Mr. and Mrs. Hiatt in Mrs. Hiatt's testimony or attachments to her testimony. Since this route adjustment represents the proposal of someone other than ATXI, ATXI does not know the precise centerline of the route adjustment intended by the party making the proposal. ATXI's response to this data request reflects and is based on its understanding of the identified route adjustment proposed by others. This question asks ATXI whether the referenced modification "affect landowner(s) that did not receive notice prior to April 18, 2025." ATXI understands "affect" as used in this question to have the same meaning as the definition of "directly affected" contained in 20 CSR 4240-20.045(6)(K). Similarly, ATXI understands the "notice" as used in this question to refer to the notice of an application referenced in 20 CSR 4240-20.045(6)(K). The data request does not specify what period of time should be used for identifying the owner of the affected land. ATXI understands the data request to refer to owners of the affected land on a date not more than sixty (60) days prior to July 5, 2024.

The Hiatt Modification affects an owner of land who was not directly affected by ATXI's proposed route in its application and, as a result, ATXI did not notify the owner(s) of that parcel of its application. The parcel number for that land is 07-08-04-17-2. ATXI has not confirmed the name(s) of the owner(s) of that parcel but understands that parcel was and is owned by Mr. and Mrs. Hiatt. The other parcels affected by the Hiatt Modification are parcel numbers 07-08-04-17-2.02, 07-08-03-8-4, and 07-08-03-8-2. Those parcels did not require an easement or other permanent property interest for ATXI's proposed route contained in its application but received notice of ATXI's application because they were within 300 of the centerline of ATXI's proposed route. The Hiatt Modification would move the line onto parcel numbers 07-08-04-17-2.02, 07-08-04-17-2, 07-08-03-8-4, and 07-08-03-8-2 for the full length of the proposed route adjustment whereas no part of the line or its right-of-way would be located on those parcels under ATXI's proposed route.

Case No. EA-2024-0302

INFORMATION CONTAINED

IN

MPSC 57.0 COVERSHEET (MAPS)

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Case No. EA-2024-0302

INFORMATION CONTAINED

IN

MPSC 57.0 ATTACHMENT 1

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Case No. EA-2024-0302

INFORMATION CONTAINED

IN

MPSC 57.0 ATTACHMENT 2

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Case No. EA-2024-0302

INFORMATION CONTAINED

IN

MPSC 57.0 ATTACHMENT 3

HAS BEEN DEEMED

CONFIDENTIAL

IN ITS ENTIRETY

Ameren Transmission Company of Illinois
Response to MPSC's Data Request - MPSC
EA-2024-0302

Application of ATXI for a Certificate of Convenience and Necessity under Section 393.170.1,
RSMo. relating to Transmission Investments in Northwest and Northeast Missouri
Dated Submitted: September 12, 2025

No.: MPSC 0059

Refer to item 47 in docket EA-2024-0302. Page 1 of Exhibit 2 of the Albany, MO local public hearing. a) Does the modification proposed by Mr. Harding on Page 1 of Exhibit 2 affect landowner(s) that did not receive notice prior to April 18, 2025? If so, provide the parcel numbers and describe the affect. b) What is the cost impact of the modification proposed by Mr. Harding on Page 1 of Exhibit 2 as compared to DO-28? c) Does ATXI believe the modification proposed by Mr. Harding on Page 1 of Exhibit 2 to be constructible and technically feasible? Why or why not?

RESPONSE

Prepared By: Sam Morris

Title: Senior Manager, Major Projects, Ameren Services Company

Phone No.: 314-861-4819

- a) As noted in ATXI's response to Data Request No. MPSC 0057, the route modification referenced in this data request and depicted in EFIS Item No. 47 in docket EA-2024-0302, on page 1 of Exhibit 2 of the Albany, MO local public hearing, has been identified by ATXI as "Harding Modification 4" for ease of reference and consistency with the numbering/naming convention used in ATXI's rebuttal testimony. Harding Modification 4 is depicted in MPSC 0057.0 Attach 1 (Confidential). Since this route adjustment represents the proposal of someone other than ATXI, ATXI does not know the precise centerline of the route adjustment intended by the party making this proposal. ATXI's responses to this data request reflect and are based on its understanding of the identified route adjustment proposed by others. This question asks ATXI whether the referenced modification "affects landowner(s) that did not receive notice prior to April 18, 2025." ATXI understands "affect" as used in this question to have the same meaning as the definition of "directly affected" contained in 20 CSR 4240-20.045(6)(K). Similarly, ATXI understands the "notice" as used in this question to refer to the notice of an application referenced in 20 CSR 4240-20.045(6)(K). The data request does not specify what period of time should be used for identifying the owner of the affected land. ATXI understands the data request to refer to owners of the affected land on a date not more than sixty (60) days prior to July 5, 2024.

The referenced route adjustment affects the owners of land who were not directly affected by ATXI's proposed route in its application and, as a result, ATXI did not notify the owners of those parcels of its application. The parcel numbers and effect of the route

adjustment on such parcels, based on ATXI's understanding of this route modification identified as Harding Modification 4, are as follows:

<u>Parcel Number</u>	<u>How Parcel Affected by Route Adjustment</u>
07-07-07-36-1	The line would run along the full length of the western border of this parcel.
07-07-07-36-2	Depending on exact placement of centerline intended by the proposed modification, parcel potentially affected along the full length of its eastern border.
07-07-07-25-5	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel.
07-07-07-25-2.01	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel.
07-07-07-25-1	The line would run between the southern and northern borders of this parcel approximately in the middle of the parcel. The line would then be located on the next parcel to the north. There may be some portion of the ROW for the line which would over property located along the northern border of this parcel from the point where it exists the property to the eastern border of the parcel,
07-07-06-24-2	The line would enter and run along the southern border of the parcel to the east border of the parcel for less than half length of the southern border of the parcel.
07-08-04-19-1	The line would run along the full length of the southern border of this parcel.
07-08-09-30-2	ATXI does not believe this parcel would be directly affected by the route adjustment because the 150' ROW should be located fully within the next parcel to the north and there are no habitable structures on this parcel to ATXI's knowledge within 300' of the centerline of the proposed adjustment. However, it is possible that after conducting an actual survey of this area some portion of the 150' ROW could extend over the northern border of this parcel.

ATXI also notes that while the owner of parcel number 07-07-07-36-5 was provided notice of ATXI's application, this route modification would move the location of the line on this parcel and increase the length of the line on this parcel from approximately 700

feet across the southeast corner of the parcel to more than 2,800 feet from the southeast corner of the parcel to the northern border of this parcel.

- b) ATXI has not estimated the costs associated with Harding Modification 4. Generally, cost impacts would be comparable with Harding Modification 1. Impacts of that modification are further described in ATXI's response to Data Request No. MPSC 0054.
- c) Based upon preliminary analysis of this route modification, it is considered both constructible and technically feasible. However, as noted in the response to Part 1 of this request, there are a number of affected landowners that did not receive notice of the application.