

**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE
STATE OF MISSOURI**

EDWARD J. BUSCH AND)	
ANDREA B. BUSCH)	
9620 W. Clarksboro)	
Liberty, Missouri 64068)	
)	
Complainants,)	
)	
vs.)	
)	
UNION ELECTRIC COMPANY / D/B/A)	
AMEREN MISSOURI)	
101 Madison)	
PO Box 780)	
Jefferson City, Missouri 65102)	
)	
Respondent.)	

**FORMAL COMPLAINT
AND/OR MOTION TO
REOPEN OR RECONSIDER ITS ORDER GRANTING CERTIFICATE OF
CONVENIENCE AND NECESSITY, FILE NO. EA-2013-0316**

Complainants Edward J. and Andrea B. Busch reside at 9620 W. Clarksboro, Liberty, Missouri 64068.

1. Respondent Union Electric Company d/b/a Ameren Missouri ("Ameren"), is a public utility under the jurisdiction of the Public Service Commission of the State of Missouri ("Commission"). Ameren is an "electric corporation" and a "public utility" as defined in section 386.020(15), (43), RSMo (Supp. 2011).

2. That Ameren is subject to the jurisdiction of this Commission under chapter 386 and 393, RSMo. The Commission has jurisdiction over the subject matter of this

Complaint as it involves an Order granting a Certificate of Convenience and Necessity (CCN) in case number EA-2013-0316.

3. That Ameren is attempting to construct a high voltage transmission line in Liberty, Clay County, Missouri. This proposed power line will run from the LMV plant in Liberty to the end of Ameren's service area, then 885 feet onto property that is located in KCP&L's service area. The 885 feet of the proposed power line is directly south of the Clarksboro/Windsor Estates subdivision.

4. That this proposed power line will be next to the property Complainants live on and own in the Clarksboro/Windsor Estates subdivision and would cause a significant impact on thier property and health.

5. That Complainants had no notice that Ameren was seeking a CCN from the Commission and the CCN which was granted on January 3, 2013. Had notice been given, Complainants would had objected and made comments known to the Commission as would have other residents of the Clarksboro/WIndsor Estates subdivision.

6. That it appears that 4 CSR 240 does not require notice to be given when Ameren proposes to build a power line outside of its service area. The lack of notice violates basic Due Process standards for Complainants and others who are affected by the proposed power line.


7. That no construction has started on this project.

8. That to our knowledge, no easement has been obtained by Ameren on the seven (7) properties which the proposed power line will go through.

9. At this time, we have filed informal complaints with the Commission. Since we are not customers of Ameren and the proposed power line is not on our property, we have no means to address Ameren.

WHEREFORE, Complainants seek the Commission to hear this formal complaint and/or reopen case number AE-2013-0316 to take testimony and evidence from Complainants, property owners of the Clarksboro/Windsor Estates subdivision, and other citizens who object to the construction of this power line.

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