

**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 Public Convenience and Necessity to Construct,) Case No. EA-2021-0087
Install, Own, Operate, Maintain, and Otherwise)
Control and Manage a 138 kV Transmission Line)
and associated facilities in Perry and Cape)
Girardeau Counties, Missouri)

**APPLICATION TO INTERVENE OF
TERRY L. ("LIN") SCHOLL AND MARY FRANCES SCHOLL**

COMES NOW Terry L. ("Lin") Scholl and Mary Frances ("Fran") Scholl (the "Scholls"), pursuant to 20 CSR 4240-2.075 of the Missouri Public Service Commission's Rules of Practice and Procedure and this Commission's May 5, 2021, *Order Directing Notice and Setting Deadlines for Intervention Applications and Staff's Recommendation* ("Order"), and for its Application to Intervene respectfully states as follows:

1. The Scholls own five parcels in Altenburg, Missouri (the "Property"), totaling approximately 330 acres (250 acres of which they have owned for twenty years). The Property includes the Scholls' primary residence as well as other structures, including a 150 year old "pinned barn." Approximately 70 acres are utilized for agriculture, while other areas have been preserved primarily for hunting, timber harvesting and outdoor activity. The Scholls have invested significant time and resources in creating and preserving habitat for wildlife on their Property. Four of the Scholls's parcels, including the parcel with the Scholls' primary residence will be directly affected by the route proposed by ATXI. As such, the specific interests of the Scholls are different from the interests of the general public.

2. On April 28, 2021, ATXI filed an Application and Direct Testimony in support of its request for a certificate of convenience and necessity ("CCN") to construct, install, own,

operate, maintain, and otherwise control and manage a 138 kV transmission line and associated facilities in Perry and Cape Girardeau Counties, Missouri (the “Project”).

3. The Scholls seek intervention because the proposed transmission line would directly impact (and potentially adversely impact) the Scholls' Property.

4. How the Project impacts landowners is relevant to whether the project is in the public interest - an issue which the Commission will determine in this case. If the Commission grants ATXI the CCN, the Scholls support the imposition of certain conditions to protect property owners, and in particular, their own Property. At this time, the Scholls are reviewing ATXI's initial filings and are unsure of any additional positions it will take in this case.

5. Intervention by the Scholls will serve the public interest in providing unique information and insights to assist the Commission in developing a complete record in order to make its determination.

6. The Scholls' interest will not and cannot be adequately represented by any other party.

7. Correspondence or communications regarding this application, including service of all notices and orders of this Commission, should be addressed to:

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WHEREFORE, the Scholls respectfully requests that the Commission issue its order granting the Scholls' Application for Intervention and that the Scholls be made a party hereto with all rights to participate in this matter.

