BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of a Proposed Amendment to)	
Commission Rule Regarding Applications)	File No. EX-2018-0189
for Certificates of Convenience and Necessity.)	

COMMENTS OF AMEREN TRANSMISSION COMPANY OF ILLINOIS

COMES NOW Ameren Transmission Company of Illinois ("ATXI), and submits these comments on proposed rule 4 CSR 240-20.045, as requested by the Commission's Notice to Submit Comments, as follows:

- 1. As a non-incumbent transmission provider, the proposed rule impacts ATXI in a manner that is different in certain ways from the impact on traditional, Commission-rate regulated utilities like ATXI's affiliate, Union Electric Company d/b/a Ameren Missouri ("Ameren Missouri"). However, many of the provisions that would impact Ameren Missouri would also impact ATXI. Consequently, ATXI fully concurs in the Comments filed today by Ameren Missouri and will not repeat those points here. There is, however, one item that that uniquely applies to ATXI.
- 2. A definition of "non-incumbent electric provider" should be added to the rule (so as to avoid any uncertainty about what it means), as follows:

"Non-incumbent electric provider" means a Federal Energy Regulatory Commission-regulated transmission company that does not serve Missouri retail customers.

Respectfully submitted,

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