**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 ) No. EA-2017-0345

Necessity Authorizing it to Construct, )

Install, Own, Operate, Maintain and )

Otherwise Control and Manage a 345-kV )

Electric Transmission Line from Palmyra, )

Missouri to the Iowa Border and an )

Associated Substation Near Kirksville, )

Missouri )

**INTERNATIONAL BROTHERHOOD**

**OF ELECTRICAL WORKERS LOCAL 2, AFL-CIO’S FIRST SET OF DATA REQUESTS TO STAFF AND INTERVENING PARTIES**

International Brotherhood of Electrical Workers Local 2, AFL-CIO (“Local 2”), propounds the following Data Request to Missouri Public Service Commission Staff (“Staff”) and all intervening parties in the above captioned proceeding under 4 CSR 240-2.090.

1. “Commission” or “PSC” means the Missouri Public Service Commission.
2. “Docket” means case no. EA-2017-0345
3. This Data Request continues to the maximum extent allowed under the applicable rules of the Missouri Supreme Court and the Commission until such time as the record in the Docket is marked “Heard and Taken.” Any Supplemental or Corrected responses should be so labeled and show the date of the supplement or correction.
4. If the party responding to this Data Request is an association, coalition, or other group (whether formed permanently or on an *ad hoc* basis), this Data Request is (except as expressly stated otherwise) directed both to the group as an entity and to each member thereof. A separate response is required of the group and a member if the answer for the group and for that member differs in any respect. If an answer is the same for the group and all members, the group may respond and so state.
5. Please use best efforts to respond to this Data Request as soon as practicable and provide responses as soon as they become available. **Please serve complete responses to this Data Request on counsel for IBEW Local 2.**

**Data Request**

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To the extent not already served on IBEW Local 2, please provide copies of all of responses (together with any attachments, supplements, or corrections thereto) to Data Requests propounded by Staff or any other party. Heretofore, please serve such copies of such responses on IBEW Local 2 simultaneously with your submission of the response to the requesting party.

s/s Patrick K. Shinners

PATRICK K. SHINNERS

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 7th day of November, 2017 to the persons on the Commission’s service list in this case.

s/s Patrick K. Shinners

Attorney for IBEW, Local Union No. 2