

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

In the Matter of the Application of Ameren Transmission)
Company of Illinois for Other Relief or, in the)
Alternative, a Certificate of Public Convenience and)
Necessity Authorizing it to Construct, Install, Own,) Case No. EA-2015-0146
Operate, Maintain and Otherwise Control and Manage)
a 345,000-volt Electric Transmission Line from)
Palmyra, Missouri to the Iowa Border and an)
Associated Substation Near Kirksville, Missouri)

**MOTION TO INTERVENE ON BEHALF OF
NEIGHBORS UNITED AGAINST AMEREN'S POWER LINE**

Pursuant to 4 CSR 240-2.075, Neighbors United Against Ameren's Power Line (Neighbors United) hereby files its Motion to Intervene. In support of this Motion, Neighbors United states as follows:

1. Neighbors United asks that communications regarding this case be directed to its counsel, whose contact information is provided below.
2. Neighbors United is a Missouri not-for-profit corporation. As of June 17, 2015, Neighbors United had approximately 375 members.
3. Neighbors United opposes the application submitted by Ameren Transmission Company of Illinois (ATXI) in this case.
3. Membership in Neighbors United consists of persons who live or own property near one or more of the routes identified earlier by ATXI as potential alternatives for its proposed transmission line as well as residents of nearby communities concerned about the negative impacts of the proposed project. With

ATXI having now proposed a single route for the line, a majority of Neighbors United members live or own property near the presently proposed route.

4. Some of Neighbors United members live or own property on the right-of-way of the proposed line. The property of those members might therefore be subject to eminent domain proceedings if the Commission approves ATXI's Application. Other members live or own property close to or in the general vicinity of the proposed right-of-way, and would therefore be affected to varying degrees even if they do not own property on the immediate right-of-way of the proposed line. Neighbors United includes members from each of the five Missouri counties through which the propose right-of-way is located.

5. Intervention by Neighbors United is a sensible and practicable means for a large number of landowners to be given a voice in a proceeding in which they have a vital interest.

6. For the reasons stated above, Neighbors United and its members have interests which are different from that of the general public, and those interests would be adversely affected if ATXI's Application is approved by the Commission.

Wherefore, Neighbors United Against Ameren's Power Line respectfully asks the Commission to grant this Motion to Intervene.

Respectfully submitted,

/s/ Paul G. Henry

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing Motion was served this 18th day of June, 2015, by email to the following:

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