## 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 Convenience and Necessity	)	Case No. EA-2022-0099
Under Section 393.170 RSMo. relating to	)	
Transmission Investments in Southeast	)	
Missouri.	)	

## APPLICATION TO INTERVENE OF THE MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

COMES NOW the Missouri Joint Municipal Electric Utility Commission ("MJMEUC"), by and through counsel, pursuant to Commission Rule 20 CSR 4240-2.060, and respectfully files its Application to Intervene in this matter. In support of this Application, MJMEUC states as follows:

- 1. On December 21, 2021, Ameren Transmission Company of Illinois ("ATXI") filed an Application and Motion for Waiver ("Application") for a Certificate of Convenience and Necessity ("CCN") and related approvals authorizing ATXI to construct, acquire, own, operate and maintain certain transmission facilities in, around, and between the Cities of New Madrid and Sikeston, Missouri (the "Project"). On December 23, 2021, the Commission issued its Order setting a deadline of January 24, 2022, for filing Applications for Intervention.
- 2. MJMEUC is a joint action agency and a body corporate and politic of the State of Missouri and, as such, is not subject to the jurisdiction of the Commission. MJMEUC is authorized by §§393.700 to 393.770, R.S.Mo. to construct, operate and maintain jointly owned transmission and generation facilities for the production and transmission of electric power for its members, to purchase and sell electric power and energy, and to enter into agreements with

any person for the transmission of electric power. MJMEUC is organized on a state-wide basis

to promote efficient wheeling, pooling, generation, and transmission arrangements to meet the

power and energy requirements of the municipal electric utilities in the State of Missouri.

MJMEUC's membership includes seventy municipal entities in Missouri and four advisory

members in Arkansas. Together, MJMEUC's members serve some 347,000 retail electric

customers.

3. Correspondence, communications, orders and the decision in this matter should be

addressed to:

Douglas L. Healy

Terry M. Jarrett

Healy Law Offices, LLC 3010 E. Battlefield, Suite A

Springfield, MO 65804

doug@healylawoffices.com

terry@healylawoffices.com

Telephone: (417) 864-7018

4. As ATXI noted in its Application, MJMEUC is a Project party.

5. Both New Madrid and Sikeston, who are Project parties, are members of

MJMEUC.

6. As a Project party to the Agreement, MJMEUC has an interest that is different

from that of the general public, in that it could be directly affected by any decision of this

Commission regarding the issuance of a CCN and related necessary approvals to ATXI to

participate in and complete the Project. MJMEUC has a direct and immediate interest in this

proceeding that is not currently represented in this matter.

7. MJMEUC supports ATXI's Application and Motion for Expedited Treatment.

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WHEREFORE, MJMEUC respectfully requests that the Commission grant its Application to Intervene on its behalf and on behalf of its members, entitling it to fully participate in this proceeding.

Respectfully Submitted,

HEALY LAW OFFICES, LLC

Douglas J Haly

Bv:

Douglas L. Healy, #51630 Terry M. Jarrett, #45663

3010 E. Battlefield, Suite A Springfield, MO 65804 doug@healylawoffices.com terry@healylawoffices.com Telephone: (417) 864-7018

ATTORNEYS FOR MJMEUC

## **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 30<sup>th</sup> day of December, 2021.

Douglas L. Healy