

**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, Operate, ) File No. EA-2015-0146  
Maintain and Otherwise Control and Manage a )  
345,000-volt Electric Transmission Line from Palmyra, )  
Missouri, to the Iowa Border and Associated Substation )  
Near Kirksville, Missouri.<sup>1</sup> )

**MOTION FOR ORDER SCHEDULING PRE-HEARING CONFERENCE AND  
TO ESTABLISH DATE FOR RESPONSE TO INTERVENTION REQUESTS**

COMES NOW Ameren Transmission Company of Illinois (ATXI), by and through its counsel, and for its motion for order scheduling pre-hearing conference and to establish a date by which responses to intervention requests shall be filed, states as follows:

1. On May 29, 2015, ATXI filed the Application that is the subject of this case seeking, alternatively, a finding that the Commission lacks jurisdiction over ATXI or, if the Commission determines it has jurisdiction over ATXI, a Commission order for a certificate of public convenience and necessity for the transmission line project described in the Application. On December 9, 2014, ATXI had previously filed the 60-day notice required by 4 CSR 240-4.020(2).

2. In addition to the relief described above, ATXI's Application also requested that the Commission "schedule a prehearing conference to occur as soon as possible after the close of the intervention period to be established, and order the parties to propose a procedural schedule that will allow the Commission to issue an order effective no later than January 31, 2016."

3. On June 2, 2015, the Commission issued its *Notice and Order* which set an intervention application deadline of June 22, 2015, and which also indicated that evidentiary

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<sup>1</sup> The project for which the CCN is sought in this case also includes a 161,000-volt line connecting to the associated substation to allow interconnection with the existing transmission system in the area.

hearings would not be necessary unless the Staff or the Office of the Public Counsel requested a hearing or unless intervention requests, if made, are granted.

4. Based upon the Commission's prior practice, ATXI believes it is likely that intervention requests will be made, that at least some of them will be granted and that at least some of the interveners will request a hearing regarding the Application. It is for that reason that ATXI requested that the Commission proceed to schedule a prehearing conference upon the filing of the Application instead of postponing scheduling such a conference until after the intervention deadline had passed.

5. As outlined in ATXI's pre-filed testimony filed concurrently with its Application, the project schedule is such that it is important that this case be resolved by a final Commission order to be effective no later than January, 2016, or sooner if possible. ATXI believes that anticipating the need for a prehearing conference and the establishment of a procedural schedule that will allow evidentiary hearings to be timely held is an important step toward obtaining a timely order and desires to avoid undue delay in proceeding to get a procedural schedule established. In the unlikely event that it appears that a hearing will not be required, the prehearing conference could be cancelled.

6. ATXI has consulted with the Staff and the Office of the Public Counsel, both of which have authorized the undersigned counsel to state that they agree that it is highly likely that evidentiary hearings will be needed to resolve this case and that a prehearing conference should be scheduled to occur promptly after the intervention deadline has passed and after sufficient time has lapsed so that any responses to intervention requests can be filed.

WHEREFORE, ATXI respectfully requests that the Commission set June 29, 2015, as a deadline for responses to any intervention requests that are filed after June 19, 2015 (but by the

intervention deadline of June 22), and that it schedule a prehearing conference for the purpose of facilitating the establishment of a procedural schedule for this case with the conference to occur the week of July 6, 2015 (but not on July 9, 2015, when a workshop in File No. EW-2011-0139 is scheduled to occur).

Respectfully submitted,

*/s/ James B. Lowery* \_\_\_\_\_

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**CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the public version of the foregoing Application has been e-mailed, this 12th day of June, 2015, to the Missouri Public Service Commission Staff and to the Office of the Public Counsel.

*/s/ James B. Lowery* \_\_\_\_\_  
**An Attorney for Ameren Transmission  
Company of Illinois**