

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

In the Matter of the Application of Ameren Transmission)
Company of Illinois for a Certificate of Public)
Convenience and Necessity Authorizing it to Construct,)
Install, Own, Operate, Maintain and Otherwise Control) File No. EA-2017-0345
and Manage a 345-kV Electric Transmission Line in from)
Palmyra, Missouri to the Iowa Border and an Associated)
Substation near Kirksville, Missouri.)

**NEIGHBORS UNITED AGAINST AMEREN’S POWER LINE’S
APPLICATION TO INTERVENE**

COMES NOW Neighbors United Against Ameren’s Power Line (Neighbors United) pursuant to 4 C.S.R. 240-2.075, and for its Application for Intervention in this case, states as follows:

1. Neighbors United is a Missouri not-for-profit corporation comprised of approximately 400 members, all residing in the counties affected by this proposed project.
2. Pleadings, notices, orders, and other correspondence concerning this matter should be addressed to:

Mr. Arturo A. Hernandez, III
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3. Neighbors United opposes the application submitted by Ameren Transmission Company of Illinois (ATXI) in this case.
4. ATXI is proposing to construct, install, own, operate, maintain and otherwise control and manage a 345-kV electric transmission line approximately 96 miles in length and running generally from a switching station near Palmyra, Missouri, and generally proceeding along

an existing east-west 161-kV transmission line corridor through Marion, Lewis, Knox and Adair counties to a new substation located near Kirksville, Missouri, and then generally proceeding along an existing north-south 161-kV transmission line corridor through Adair and Schuyler counties, to a connection point on the Iowa border.

5. This route is proposed to utilize existing easements that have been identified as belonging to other utilities or to cross properties owned by members of Neighbors United. This proposed route and the easements proposed to be utilized by ATXI in this project contradict sworn testimony of ATXI's witness given in the previous CCN application for this project, EA-2015-0146, regarding the reliability and cost effectiveness of the project and joint easement matters.
6. Membership in Neighbors United consists of persons who live or own property near the proposed routes identified 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 on or near the presently proposed route.
7. 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.
8. 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.
9. 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.

10. Intervention by Neighbors United is a sensible and practicable given their continued interest in the project. Including the continued interest stemming from their original intervention, and actions in EA-2015-0146.
11. 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 by any order in this case.
12. Moreover, the potential impact on Neighbors United members and their property makes it clear that its intervention is necessary to protect said interest.
13. Consequently, under 4 CSR 240.2.075, Neighbors United's intervention request should be granted.

WHEREFORE, Neighbors United Against Ameren's Power Line respectfully requests that the Commission grant its Application to intervene and that it be made a party hereto with all rights to participate in this matter.

Respectfully submitted,

GIBBS, POOL & TURNER, P.C.

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*ATTORNEYS FOR NEIGHBORS UNITED
AGAINST AMEREN'S POWER LINE*

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document, Neighbors United Against Ameren's Power Line's Application to Intervene was served via electronic mail (e-mail) or via regular mail on this 6th day of October, 2017 on counsel for all parties of record.

/s/ Arturo Hernandez