# 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-2014
Maintain and Otherwise Control and Manage a	)	
345,000-volt Electric Transmission Line in Marion	)	
County, Missouri, and an Associated Substation near	)	
Palmyra, Missouri.	)	

### **NOTICE**

COMES NOW Ameren Transmission Company of Illinois (ATXI) and, without conceding that ATXI is subject to the jurisdiction of the Missouri Public Service Commission or otherwise required to file this notice, hereby submits the notice contemplated by 4 CSR 240-4.020(2), thereby giving notice that it may file a conditional application for a certificate of public convenience and necessity, pursuant to Section 393.170, RSMo. (2000), seeking a determination that the Commission lacks authority to issue such a certificate to ATXI, but requesting in the alternative that if the Commission determines that it possesses such authority, the Commission issue such a certificate authorizing it to construct, install, own, operate, maintain and otherwise control and manage a 345,000-volt electric transmission line approximately 7 miles in length and running generally from a new substation to be constructed near Palmyra, Missouri, and extending across the Mississippi River to Quincy, Illinois, across Marion County in Missouri. The new transmission line and substation project is a part of a Midcontinent Independent System Operator, Inc.-approved multi-value project (MVP) and is a part of a new transmission line running from Missouri to Indiana.

Since a hearing is required when Section 393.170.3, RSMo., applies, if the Commission were to assert jurisdiction, this would be a contested case and the Commission's rules would contemplate this notice. Aside from the jurisdictional issue, the other principal issue in this case if jurisdiction is asserted is whether the proposed electric transmission line is necessary or convenient to the public service.

Respectfully submitted,

## /s/ Michael R. Tripp

Michael R. Tripp, Mo. Bar #41535 James B. Lowery, Mo. Bar #40503 SMITH LEWIS, LLP P.O. Box 918 Columbia, MO 65205-0918 (T) 573-443-3141 (F) 573-442-6686 tripp@smithlewis.com lowery@smithlewis.com

Attorneys for Ameren Transmission Company of Illinois

# **CERTIFICATE OF SERVICE**

The undersigned certifies that true and correct copies of the foregoing have been e-mailed or mailed, via first-class United States Mail, postage pre-paid, to the service list of record this

Staff Counsel's Office Missouri Public Service Commission P.O. Box 360 200 Madison Street, Suite 800 Jefferson City, Missouri 65102 staffcounselservice@psc.mo.gov Office of the Public Counsel P.O. Box 2230 200 Madison Street, Suite 650 Jefferson City, MO 65102-2230 opcservice@ded.mo.gov

### /s/ Michael R. Tripp

An Attorney for Ameren Transmission Company of Illinois