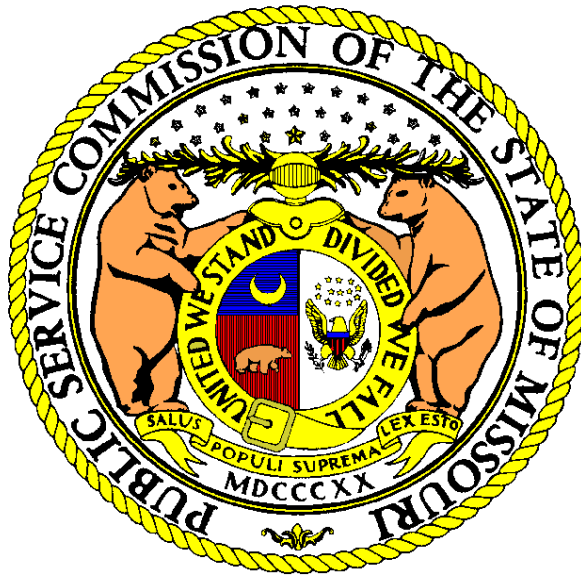


MISSOURI PUBLIC SERVICE COMMISSION

STAFF

REBUTTAL REPORT



AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2021-0087

*Jefferson City, Missouri
August 24, 2021*

**** Denotes Confidential Information ****

**TABLE OF CONTENTS OF
STAFF REBUTTAL REPORT
AMEREN TRANSMISSION COMPANY OF ILLINOIS
CASE NO. EA-2021-0087**

1
2
3
4
5
6
7
8
9

I. Executive Summary1
II. Application Summary2
III. Five Tartan Criteria.....3
Attachment A - Public Comments received since August 20, 202122
Appendix 1 - Staff Credentials22

STAFF REBUTTAL REPORT
AMEREN TRANSMISSION COMPANY OF ILLINOIS
CASE NO. EA-2021-0087

I. Executive Summary

On April 28, 2021, Ameren Transmission Company of Illinois (“ATXI”) filed the Application seeking a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, maintain and otherwise control and manage approximately 15 miles of a new 138 kV transmission line and a new 138 kV to 161 kV switching station (“Project”). The Project is located in Perry and Cape Girardeau counties.

Staff reviewed ATXI’s Application and Direct Testimony based on the five factors the Commission listed in *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994) (“Tartan Criteria”):

- Need,
- qualifications to own, operate, control and manage the facilities and provide the service,
- financial ability,
- economic feasibility, and
- promotion of the public interest.

In summary, based on Staff’s review: 1) the Project is needed for Citizens Electric Cooperative (“Citizens”) and Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) to continue to provide safe and adequate service to their customers; 2) ATXI is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project; 3) ATXI has the financial ability to undertake the Project; 4) the Project is economically feasible; and 5) the Project is in the public interest with the conditions recommended by Staff.

1 Staff's recommended conditions are presented in the public interest section of this report
2 and cover the following topics:

- 3 • Right-of-way acquisition process;
- 4 • residential structures currently occupied by the property owners;
- 5 • securing, tracking, and reporting of easements;
- 6 • construction, clearing, maintenance, repair, and right-of-way practices;
- 7 • various filing requirements; and an
- 8 • acknowledgement from Ameren Missouri regarding a previous
9 Commission order.

10 **II. Application Summary**

11 The Project for which ATXI is seeking a CCN consists of approximately 15 miles of a new
12 138 kV transmission line and a new 138 kV to 161 kV switching station. The Project is a portion
13 of a larger transmission project which is being jointly developed by ATXI and Wabash Valley
14 Power Alliance ("Wabash Valley"), referred to as the ATXI-Wabash Development or the
15 Limestone Ridge Project. The partnership between ATXI and Wabash Valley is governed by the
16 Joint Development Agreement and two additional contracts, the Fiber License agreement and the
17 Option to Purchase Agreement. The ATXI-Wabash Development will interconnect Wabash
18 Valley's existing Grand – Tower – Seminary 138 kV transmission line to its 161 kV Trail of Tears
19 and Charmin Bulk substations and to Ameren Missouri's existing 161 kV Wedekind – Trail of
20 Tears transmission line.¹

21 Ameren Missouri and Citizens Electric Cooperative are the local distribution companies
22 in the area of the project. Wabash Valley is the affiliated Generation and Transmission
23 cooperative that serves Citizens Electric Cooperative with power and transmission needs in
24 Southeast Missouri.

¹ Schedule SB-01, Page 1.

1 Wabash Valley's portion of the ATXI-Wabash development is not included in ATXI's
2 CCN request. Wabash Valley is responsible for constructing the new Wittenberg Substation
3 (located on the existing Grand-Tower-Seminary 138 kV transmission line), a second Trail of Tears
4 substation, and a new redundant 161 kV line between the existing Trail of Tears Substation and
5 Charmin Bulk Substation.

6 As a part of the ATXI-Wabash Development, Ameren Missouri plans to sell to Wabash
7 Valley a portion of the Wedekind to Charmin Bulk 161 kV transmission line. The segment is
8 approximately 1.5 miles and runs from the existing Trail of Tears Substation to the Charmin Bulk
9 Substation. Ameren Missouri will pursue the regulatory approvals necessary to consummate that
10 transaction. Wabash Valley intends to acquire the segment at Original Cost Depreciated Value.²

11 ATXI has filed with its Application and Direct Testimony the minimum filing requirements
12 of 20 CSR 4240-20.045(6).

13 **III. Five Tartan Criteria**

14 **Whether there is a need for the facilities and service**

15 The purpose of the ATXI-Wabash development is to strengthen local grid reliability for
16 the local distribution companies in the area, Ameren Missouri and Citizens Electric Cooperative.
17 ATXI identifies the primary purpose of the project is to provide a networked transmission source
18 that will support the Citizens' Trail of Tears substation and Citizens' adjacent retail load, a large
19 manufacturing facility, ** [REDACTED]

20 [REDACTED] ^{3,4} The additional networked connection is intended to benefit Ameren Missouri in

² Schedule SB-01, Page 1.

³ Direct Testimony of Sean Black, Page 6, Lines 4-7.

⁴ Schedule SB-01, Page 1.

1 other parts of its system, as “an additional source to the northern Cape Girardeau area which
2 provides additional voltage support and reliability to Ameren Missouri customers under some
3 system conditions.”⁵ Under the Joint Development Agreement, ATXI and Wabash Valley agreed
4 to jointly develop the ATXI-Wabash development “for the purpose of providing enhanced
5 reliability to Wabash Valley member load, ** [REDACTED] ** and
6 additional strategic flexibility to ATXI and/or Ameren Missouri to address potential, future
7 customer needs.”⁶ Further, ATXI has designed the foundations and structure to allow for the
8 future addition of a second 345 kV circuit to “provide ATXI and/or Ameren Missouri with a
9 strategic option to cost-effectively construct a future 345 kV project.”⁷ In summary, ATXI asserts
10 that: “[t]he Project will improve energy reliability and operational flexibility, provide additional
11 capacity to local manufacturing facilities and allow for efficient future expansion of the
12 transmission grid.”⁸

13 **Reliability and Operational Flexibility**

14 The existing transmission supply in the area consists of an existing Ameren Missouri
15 161 kV radial line (identified in the figure⁹ below as “Ameren MO Line to Wedekind”). This
16 161 kV line is the only transmission-voltage source to the existing Trail of Tears and Charmin
17 substations (owned by Citizens Electric). Wabash Valley (on behalf of Citizens Electric) is a

⁵ Schedule SB-01, Page 1.

⁶ Schedule SB-01, Page 12.

⁷ Schedule SB-01, Page 1.

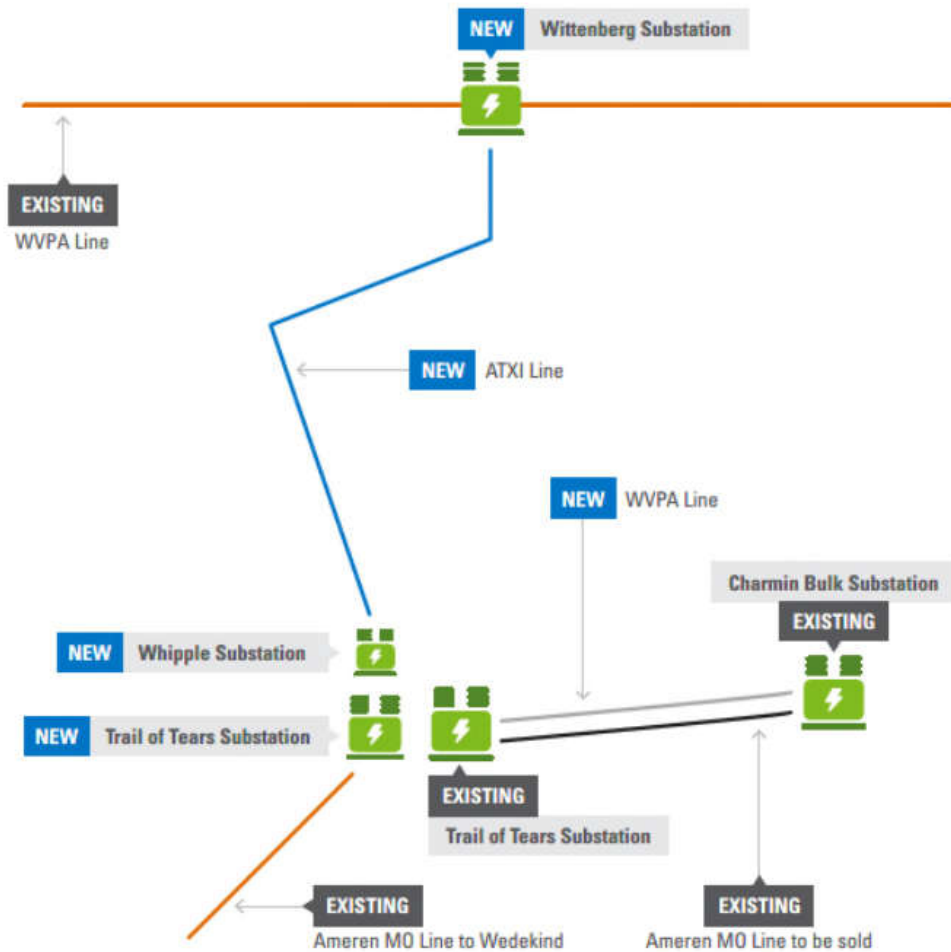
⁸ Direct Testimony of Sean Black, Page 19, Lines 7-9.

⁹ Direct Testimony of Sean Black, Page 10.

1 wholesale distribution customer of Ameren Missouri.¹⁰ ** [REDACTED]

2 [REDACTED]¹¹ [REDACTED] **

3



4

5 A radial system has one power source, meaning that a power failure, short-circuit, or
6 downed line could interrupt service to the entire line. The ATXI-Wabash development will provide

¹⁰ “Fourth Revised Wholesale Distribution Service Agreement for Wabash Valley Power Association, Inc. (for Citizens Electric Corporation, a Member of Wabash Valley Power Association, Inc.)”

¹¹ Schedule SB-01, Page 1.

1 a networked system for Citizens electric customers in the area. Wabash Valley¹² describes the
2 benefits to Citizens as follows:

3 The Limestone Ridge project will provide substantial reliability benefits to
4 all members of Citizens in eastern Perry and northern Cape Girardeau
5 counties. It will improve energy reliability to local businesses, residences
6 and manufacturing facilities. In particular, it will enable Citizens Electric to
7 remove an aging 69 kV transfer scheme at Trail of Tears substation. This
8 will allow Citizens Electric to move openings in an existing 38-mile 69 kV
9 transmission line essentially splitting it in half to increase reliability for
10 residences and businesses in the Longtown to Jackson areas. Additionally,
11 the Limestone Ridge project will provide a second high voltage source to
12 the City of Altenburg as well as to a large manufacturing facility via the
13 Trail of Tears substation.

14 ** [REDACTED] ¹³

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED] **

21 ATXI notes the project is “not directly necessary for Ameren Missouri to meet NERC
22 Reliability Standards, Ameren’s local Planning Criteria as filed with FERC, or to deliver energy
23 from Ameren Missouri generating resources.”¹⁴ However, ATXI asserts the ATXI-Wabash
24 Development helps support Ameren Missouri’s local reliability by providing a third source of
25 supply to Ameren’s Wedekind Substation, which serves the northern Cape Girardeau area.^{15,16}

¹² Response to Staff’s Data Request No. 0005.3.

¹³ Response to Staff’s Data Request No. 0022.

¹⁴ Direct Testimony of Sean Black, Page 8, Lines 3-4.

¹⁵ Direct Testimony of Sean Black, Page 7, Lines 8-13.

¹⁶ Schedule SB-01, Page 1.

1 The ATXI-Wabash Development was studied in MISO Transmission Expansion Planning
2 (“MTEP”) 2020 as project number 17845. The ATXI-Wabash Development is identified in
3 MTEP 2020 as being driven by local planning criteria without Electric Reliability Organization
4 standard applicability. The development is not a reliability project identified by MISO because it
5 does “not meet the criteria to be considered as Baseline Reliability Projects (BRP), New
6 Transmission Access Projects, Market Efficiency Projects, or Multi-Value Projects.”¹⁷

7 Scheduling Ameren Missouri’s replacement of aging structures in poor condition is
8 complicated by the 161 kV line being a radial line. ** [REDACTED]

9 [REDACTED]
10 [REDACTED]
11 [REDACTED]¹⁸ [REDACTED]
12 [REDACTED] **¹⁹ In planning
13 outages to replace aging structures, certain commercial and industrial facilities in the region would
14 need to temporarily reduce power or halt operations because of a lack of networked transmission
15 supply. ** [REDACTED]

16 [REDACTED]
17 [REDACTED]
18 [REDACTED]
19 [REDACTED]
20 [REDACTED] **²⁰

¹⁷ MTEP 2020, Page 61.

¹⁸ ** [REDACTED]
[REDACTED] ** Response to Staff’s Data Request No. 0005.1.

¹⁹ Response to Staff’s Data Request No. 0005.1.

²⁰ Response to Staff’s Data Request No. 0005.1.

1 **Additional Capacity to Serve Load**

2 The ATXI-Wabash Development aims to provide value by “permitting economic
3 development by providing additional capacity to serve residential, commercial, and industrial
4 loads in the area”²¹ However, no formal analysis has been performed.²²

5 ** [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED] **²³

9 **Future 345 kV Project**

10 Although the initial project consists of an approximately 15-mile 138 kV line, ATXI plans
11 to install structures that are capable of carrying an additional circuit at 345 kV. ATXI asserts
12 that such a design “could, in the future, provide additional strategic value to the region.”²⁴
13 Either ATXI or Ameren Missouri would seek authority from the Commission for the future 345 kV
14 circuit. If the 345 kV line is approved in the future, Wabash Valley will have the option to
15 acquire the 138 kV circuit being contemplated under the requested CCN per the Option to
16 Purchase Agreement.

17 ATXI witness Sean Black explains the current Project “could become a strategic piece of
18 a larger regional expansion, which has been under consideration for years, and which would benefit
19 the Ameren system and the region as a whole.”²⁵

20 ** [REDACTED]

21 [REDACTED]

²¹ Direct Testimony of Sean Black, Page 10, Lines 12-17.

²² Response to Staff’s Data Request No. 0005.

²³ Response to Staff’s Data Request No. 0005.3.

²⁴ Direct Testimony of Sean Black Page 7, Lines 15-16.

²⁵ Direct Testimony of Sean Black Page 8, Lines 14-16.

1 [REDACTED]
2 [REDACTED]
3 [REDACTED]
4 [REDACTED]
5 [REDACTED]
6 [REDACTED]
7 [REDACTED]
8 [REDACTED]
9 [REDACTED]
10 [REDACTED]
11 [REDACTED] ** 26

12 ATXI’s intent is “to design, construct and seek real estate rights for double-circuit
13 structures in conjunction with this Project.”²⁷ The proposed design for the majority of structures
14 is a galvanized steel monopole. These double-circuit structures will be 100-160 feet tall and
15 self-supporting (i.e. will not use down wires), placed approximately 800-1,000 feet apart.²⁸
16 ATXI is requesting a 125 foot voluntary easement from landowners to accommodate the currently
17 requested 138 kV circuit and future additional 345 kV circuit.²⁹ However, ATXI represents that
18 in an eminent domain proceeding, ATXI would only have authority for the easement associated
19 with the 138 kV line (100 feet).³⁰

20 **Conclusion**

21 Staff concludes that the Project is needed to support the local reliability needs of Citizens
22 and provide operational flexibility to Ameren Missouri. Staff recommends the Commission
23 include in its order that any authority granted to ATXI pertains only to the application presented

²⁶ Response to Staff’s Data Request No. 0018.
²⁷ Direct Testimony of Sean Black Page 8, Lines 9-10.
²⁸ Direct Testimony of Jessica Timmermann, Page 4, Lines 14-19.
²⁹ Direct Testimony of Craig Hiser, Page 10, Lines 20-22.
³⁰ Direct Testimony of Craig Hiser, Page 11, Lines 8-13.

1 by ATXI and does not include any findings or authority grants related to the portions of the
2 ATXI-Wabash Development to be built by Wabash Valley or the assets described in the ATXI
3 application for which authority has not specifically been sought.

4 *Staff Witness: Claire M. Eubanks, PE*

5 **Whether the applicant is qualified to construct, install, own, operate, maintain,**
6 **and otherwise control and manage the Project**

7 ATXI, an affiliate of Ameren Corp., has been in business for over fourteen years and has
8 previously been granted Certificates of Need and Necessity from this Commission for several
9 projects dating back to 2015. ATXI has developed several Multi-Value Projects in Missouri and
10 Illinois including the Mark Twain, Illinois Rivers, and Spoon River projects. The Limestone Ridge
11 project is being constructed using a Design-Bid-Build process ATXI, as the owner, utilizes
12 Ameren Services to manage and supervise the Project. ATXI witness Mr. James Jontry provides
13 additional detail regarding the management and construction of the project on page 5 through
14 page 7 of his direct testimony.

15 ATXI will also utilize the operations and maintenance services of Ameren Services when
16 the Project is complete. Ameren Services operates maintains primary and back-up control centers
17 which are staffed by system operators certified by North American Electric Reliability Corporation
18 (“NERC”), the primary control center conducts operational switching and coordination with
19 interconnected systems. Ameren Services routinely patrols and coordinates scheduled
20 maintenance. Additionally, in the event of an unplanned outage, Ameren Services will follow its
21 documented procedures.³¹

³¹ Direct Testimony of James Jontry, Pages 12-14.

1 Further, Staff completed a review of the internal standards of Ameren Services related to
2 patrol and repair of its assets, vegetation management, and unplanned outages.³²

3 Staff concludes ATXI is qualified to construct, install, own, operate, maintain, and
4 otherwise control and manage the Project.

5 *Staff Witness: Claire M. Eubanks, PE*

6 **Whether the applicant has the financial ability for the undertaking**

7 ATXI's capital structure is composed of short-term debt, long-term debt, and common
8 equity.³³ The acquisition and initial capital cash flow requirements are planned to be financed by
9 either available cash on hand or short-term borrowings, which would be available under Ameren's
10 Utility Money Pool arrangement (the "Money Pool Arrangement").³⁴ The short-term borrowings
11 will be replaced by a permanent source of capital that includes a balanced blend of long-term debt
12 and common equity.³⁵ This financing plan is consistent with how ATXI finances its capital needs.

13 In the Money Pool Arrangement, Ameren Missouri, Ameren Illinois, and ATXI may
14 participate in the utility money pool as both lenders and borrowers.³⁶ ATXI issued \$450 million
15 senior unsecured long-term notes in 2017, and has a \$75 million, 3.65% promissory note due in
16 2025 outstanding, which was issued under a 2015 long-term borrowing agreement with Ameren.³⁷
17 In 2017, ATXI received an A2 credit rating from Moody's.³⁸

³² Attachments provided in response to Staff's Data Request Nos. 0009, 0010, 0011, and 0012.

³³ Staff's Data Request No. 0002.

³⁴ Staff's Data Request No. 0001.

³⁵ On Page 13, Lines 5-9, Black's Direct Testimony.

³⁶ Staff's Data Request No. 0001.

³⁷ On Page 14, Lines 1-9, Black's Direct Testimony.

³⁸ Staff's Data Request No. 0003.

ATXI is currently conducting multiple projects such as the Limestone Ridge project, which will not be completed and placed in-service until December 2023. In addition, by December 2023, ATXI will have certain debt issuances maturing and expects to issue additional long term debt.

The table below shows the actual ATXI capital structure as of 3/31/21 as well as the projected capital structure as of 12/31/23.³⁹

	Actual Capital Structure 3/31/2021		Projected Capital Structure 12/31/2023					
	Amount (\$M)	Percent (%)	Amount (\$M)		Percent (%)			
Equity	\$789.9	55.00%	**	██████	**	**	██████	**
Long Term Debt	\$525.0	36.56%	**	██████	**	**	██████	**
Short Term Debt	\$121.2	8.44%	**	██████	**	**	██████	**
Total	\$1,436.1	100.00%	**	██████	**	**	██████	**

Based on the total capitalization needs of ATXI including all aspects impacting the capital structure, Staff has not found any major issue that may impair ATXI’s ability to manage the balance of debt and equity in its capital structure to minimize its overall cost of capital and, at the same time, maintain financial strength and stability. Staff concludes that ATXI is financially capable of executing the project.

Staff Witness: Dr. Seoung Joun Won, PhD

Whether the proposal is economically feasible

ATXI represents that Project facilities will be included in ATXI’s transmission revenue requirement calculated under the MISO tariff and included in the MISO Schedule 9 rate for the

³⁹ Staff’s Data Request No. 0002.

1 AMMO Pricing Zone.⁴⁰ The ATXI revenue requirement associated with the Project will be
2 recovered from all transmission customers in the AMMO Pricing Zone, subject to the terms of the
3 FERC-approved Joint Pricing Zone Revenue Agreement (“JPZA”) in place between Ameren
4 Missouri, ATXI and Wabash Valley.⁴¹ Given the requirements of MISO for the timely payment
5 of Schedule 9 rates by transmission customers, Staff has no reason to question the economic
6 feasibility of ATXI concerning recovery of the revenue requirement associated with the Project.

7 Under the JPZA, each transmission owner submits and posts its revenue requirement
8 calculation under its FERC approved Attachment O formula rate template. Consistent with
9 Section 3.b of Schedule 9, MISO sums each Transmission Owner's net revenue requirement to be
10 collected from the AMMO Pricing Zone and divides by the total load in the AMMO Pricing Zone
11 to determine an annual rate per MW-Yr for Schedule 9. The annual charge is converted to a rate
12 per MW-Mo and billed each month to wholesale customers based on their load at time of the
13 system peak demand. MISO does not include Schedule 9 charges on the Ameren Missouri
14 transmission invoice related to Ameren Missouri Bundled Load as specified in Section 37.3a. of
15 the MISO Tariff. Ameren Missouri and Wabash update revenue requirement calculations each
16 June 1 based on the prior year's actual costs. ATXI updates its revenue requirement calculation
17 each January 1 and its formula is based on projected costs, which are subject to true-up to actual
18 costs.⁴² Using an estimate prepared by ATXI, the first-year cost to Ameren Missouri is
19 anticipated to be approximately \$3,792,898.⁴³

⁴⁰ See Confidential testimony of Sean Black, at Page 15.

⁴¹ See ATXI response to Staff's Data Request No. 0020.

⁴² See ATXI response to Staff's Data Request No. 0020.

⁴³ See ATXI response to Staff's Data Request No. 0020, which notes “However, the exact amount received by ATXI is a function of both the 12CP load divisor used to set the monthly AMMO Schedule 9 rate as well as actual retail and wholesale load in the AMMO pricing zone over the 12-month period. Since ATXI is using a projected ATTR with a true-up, any difference in recovery from actual costs will be reflected in future rates. Therefore, a more appropriate answer may be \$3.897 million reflecting ATXI incremental ATRR of \$4.229 million times Ameren Missouri's share

1 Staff notes that in the event any portion of the Project is within the Ameren Missouri service
2 territory, those portions are subject to Commission-approved provisions limiting the revenue
3 requirement applicable to Ameren Missouri. However, given that those provisions have been
4 determined by the Commission to be just and reasonable, any associated reduction in revenue
5 requirement ultimately collected by ATXI would not impair the economic feasibility of the Project.

6 *Staff Witness: Sarah L.K. Lange*

7 **Public Interest**

8 In that the public interest assessment involves essentially a reconsideration of the other
9 Tartan Criteria of need for the project, its economic feasibility, ATXI's qualifications and financial
10 ability to construct the project, Staff's assessment concludes that the Project, if conditioned as
11 recommended by Staff, is not detrimental to the public interest. In developing its recommended
12 conditions Staff considered the Routing Study efforts completed by ATXI and the public
13 comments received by the Commission.

of the load in the AMMO pricing zone of 92.16%. This estimate is based on the first 12 months of the facilities being placed in-service. However, since ATXI uses a projected revenue requirement, its rate base reflects a 13-month average balance of plant in-service. The estimated in-service date is December 1, 2023. Assuming this continues to be the expected in-service date, ATXI's projected 2023 revenue requirement would reflect 1/13th of this investment since Limestone Ridge would only be included in the 12/31/23 balance. The full investment would then be reflected in the projected 2024 revenue requirement and any true-up related to 2023 would be reflected in the projected 2025 revenue requirement." ATXI further represents that "All else equal, the difference in overall project cost between acquiring approximately 15 miles of 125-foot easement and 15 miles of 100-foot easement is roughly \$340,500 or less than 1% of the total cost. Given the relative immateriality, ATXI has not developed an ATRR reflective of that reduction (but could do so at the request of Staff). ATXI has not calculated a reduction in cost due to the potential for a 35-foot overlap. As explained in the response to Staff's Data Request No. 0019, ATXI will still need to acquire rights for a 100-foot easement, even if there is an overlap. Acquiring such rights includes compensation to the landowner and an encroachment agreement with the owner of the existing easement, Wabash Valley. It is unlikely that the costs associated with acquiring rights to a 100-foot easement with a 35-foot overlap will be significantly less than acquiring rights to a 100-foot easement without an overlap. However, the overlap is still beneficial because it reduces landowner impacts."

1 **Routing Study**

2 HDR Engineering, Inc. (HDR), on behalf of Ameren Transmission Company of Illinois
3 (ATXI), prepared a routing study to document the process used to identify the Proposed Route for
4 the Project. Starting in March 2020, the Routing Team began the integrated route selection and
5 stakeholder outreach process for the Project.

6 The phases of the route selection process detailed in this study are as follows:⁴⁴

7 1. Study Area Identification – During this phase, the project team would
8 identify the Project Area through delineation of an area between the Project
9 endpoints that would allow for a study of a geographically diverse range of
10 potential routes. The Study Area was shared with agencies at the
11 Community Representative Form meeting held in June 2020.

12 2. Potential Route Corridor Development – During this phase, narrowed
13 corridors were developed that utilize opportunities and removed areas
14 where transmission line development was not feasible. These corridors were
15 shared with agencies and public in August 2020 for input.

16 3. Potential Route Alternative Development - An extensive network of route
17 segments was identified largely within the route corridors. The route
18 segments were then comparatively evaluated to identify the most
19 advantageous segments. Potential Route Alternatives were identified by
20 creating end-to-end routes from the remaining route segments. The
21 Potential Route Alternatives were generally 600 feet wide. ATXI solicited
22 feedback on the Potential Route Alternatives from community
23 representatives, landowners, and other stakeholders at the targeted agency
24 meetings and Open Houses held in October 2020. Comments received at
25 these meetings and through other outreach tools were considered by the
26 Routing Team during the next stage of route development.

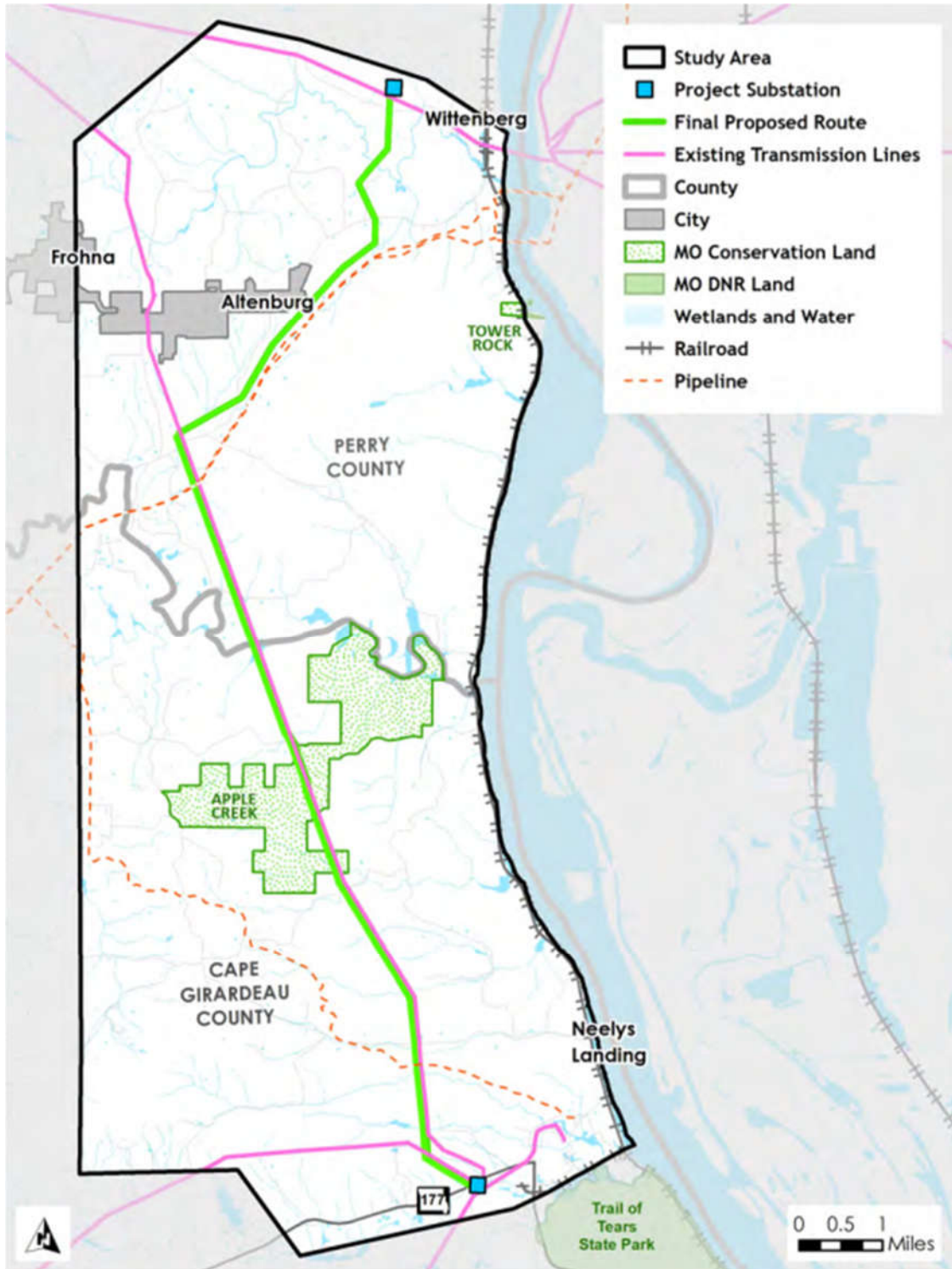
27 4. Proposed Route Development - A final route with several potential route
28 options was developed based on feedback from stakeholders and members
29 of the public. The Routing Team made an attempt to minimize impacts to
30 stakeholders while providing an economically feasible route. The final route
31 with options was shared with agencies and public in January 2021.

32 5. Final Route Identification - The Routing Team considered comments
33 received; and refined and finalized the Proposed Route.

⁴⁴ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 3.

1
2

This process produced the Proposed Route as shown in Figure 1.



3
4

Figure 1. Proposed Route⁴⁵

⁴⁵ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 22.

1 **Proposed Route**

2 The Route for the Proposed 138 kV line is 15.1 miles and will require approximately
3 299 acres of Right Of Way (“ROW”). The ROW for the Proposed Route crosses 48 distinct
4 landowners and 70 parcels. The Proposed Route parallels existing transmission infrastructure for
5 approximately 9.6 miles and parallels two pipelines for 2.45 miles.⁴⁶

6 There are no residences located within 150 feet of the Proposed Route. There is one
7 residence within 150–300 feet, nine residences within 300-500 feet, and 19 residences within
8 500-1000 feet of the Proposed Route.⁴⁷

9 There is no “prime farmland”,⁴⁸ but there is 13.9 acres of “prime farmland if drained”⁴⁹
10 and 31.1 acres of “farmland of state importance”⁵⁰ within the ROW of the Proposed Route.⁵¹

11 No public airports⁵² or navigational aids are located within three miles of the Proposed
12 Route, thus no impacts to either are anticipated.⁵³

13 A total of 28.9 acres of the ROW is within floodplain and an estimated 4 poles will be
14 placed in a floodplain. ATXI will coordinate with Missouri Emergency Management Agency
15 (“SEMA”) and county floodplain administrators to determine whether floodplain permits will be
16 required for the route if approved by the Missouri Public Service Commission.⁵⁴

⁴⁶ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 23.

⁴⁷ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 25.

⁴⁸ Prime farmland is a designation by the U.S. Department of Agriculture (USDA) used to define land (soil) that has the best physical and chemical characteristics for producing food, feed, forage, fiber, and oil seed crops.

⁴⁹ “Prime farmland if drained” is soil that has the same characteristics as prime farmland if it has been drained, which is typically done through tile drainage systems.

⁵⁰ “Farmland of statewide importance” is farmland or unique farmland that is also highly productive but with physical and chemical characteristics that are not as good as prime farmland.

⁵¹ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 28.

⁵² The Altenburg emergency helipad is within two miles of the Proposed Route. The route is located in a valley, approximately 140 – 180ft in lower elevation than the helipad location.

⁵³ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 26.

⁵⁴ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 22.

1 ATXI completed targeted geotechnical investigations along the Proposed Route. These
2 studies did not identify sinkholes or karst⁵⁵ concerns. Additional investigations will be completed
3 prior to construction.⁵⁶

4 **Resource Lands**

5 There are no known federal easements (e.g., United States Fish and Wildlife Service
6 [USFWS] or USDA Wetland Reserve Program) crossed by or within ¼ mile of the Proposed
7 Route. The Proposed Route may cross United States Department of Agriculture Conservation
8 Reserve Program (CRP) easements or Healthy Forests Reserve Program (HFRP); however, the
9 location of those easements is unknown as the information is confidential without landowners
10 providing their consent to the USDA to have the information released. ATXI real estate agents
11 will coordinate with landowners along the route, if approved by the Missouri Public Service
12 Commission, to determine whether the route crosses any CRP or HFRP easements. ATXI will also
13 coordinate with landowners and the USDA Farm Service Agency and USDA Natural Resource
14 Conservation Service so that the construction of the transmission line will comply with easement
15 requirements.⁵⁷

16 The Proposed Route crosses the Apple Creek Conservation area following an existing
17 69 kV line. 16.9 acres of ROW would be required within the conservation area. ATXI has been
18 coordinating with the Missouri Department of Conservation (MDC) and will seek the appropriate
19 approvals prior to construction of the project. The Proposed Route would also run adjacent to a
20 shooting and archery range within the conservation area; a local club operates at the range under
21 an agreement with MDC. No direct impact to the gun club is expected as the Proposed Route

⁵⁵ Karst is an area of limestone terrane characterized by sinks, ravines, and underground streams.

⁵⁶ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 31.

⁵⁷ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 29.

1 would be no closer to the range than the existing 69 kV line.⁵⁸ The proposed Route shifts to the
2 east to minimize impacts to the Apple Creek Shooting and Archery Range, and will share up to 15
3 feet of ROW with the re-aligned 69 kV line.⁵⁹

4 **Sensitive Habitat**

5 A review of the United States Fish and Wildlife Service (USFWS) Information for
6 Planning and Consultation (IPaC) identified the following species have been documented within
7 Perry and Cape Girardeau Counties: gray bat, Indiana Bat, northern long-eared bat, grotto sculpin
8 (cave fish), pallid sturgeon, Curtis' pearly mussel. The only documented habitat for grotto sculpin
9 is five large cave systems located over 9 miles to the northwest from the Proposed Route. ATXI
10 will coordinate with USFWS regarding species or habitat surveys that may be required if the
11 proposed route is approved by the Missouri Public Service Commission.⁶⁰

12 There are no known occurrences of state-listed threatened or endangered species within
13 ½ mile of the Proposed Route. The lake sturgeon and crystal darter were recorded as known
14 occurrences in the MDC Natural Heritage Program review of the study area and the Virginia
15 pennywort, a species of conservation concern, has been found in the Apple Creek Conservation
16 Area but greater than a mile from the Proposed Route. ATXI will coordinate with MDC regarding
17 necessary habitat surveys or best management practices that may be necessary to protect the
18 species if the proposed route is approved by the Missouri Public Service Commission. An eagle
19 nest has been recorded greater than ½ mile but less than 1 mile from the Proposed Route.⁶¹

20 *Staff Witness: Shawn E. Lange, PE*

⁵⁸ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 29.

⁵⁹ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 23.

⁶⁰ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 30.

⁶¹ EA-2021-0087 Dan Schmidt Direct Testimony Schedule ds-01, Page 30.

1 **Summary of Public Comments**

2 Public Comments addressed in this section are comments the Commission receives from
3 the public and are entered into the Commission’s Electronic Filing and Information System
4 (“EFIS”) as public comments. This section of the Staff’s Report addresses only the comments
5 submitted in EFIS and assigned a public comment (“P”) number. As of August 20, 2021, the
6 Commission received 27 public comments in EFIS. Of the 27 public comments, one was a petition
7 signed by 158 individuals, 17 were related to concerns with the Project, and nine were specific to
8 waiver of the in-person meeting requirement. The public comments received since August 20,
9 2021 is included in Attachment A. Additionally, the Commission held a virtual local public
10 hearing on August 17, 2021.

11 *Staff Witness: Claire M. Eubanks, PE*

12 **Recommended Conditions**

13 In summary, based on Staff’s review: 1) the Project is needed for Citizens Electric
14 Cooperative (“Citizens”) and Union Electric Company d/b/a Ameren Missouri (“Ameren
15 Missouri”) to continue to provide safe and adequate service to their customers; 2) ATXI is
16 qualified to construct, install, own, operate, maintain, and otherwise control and manage the
17 Project; 3) ATXI has the financial ability to undertake the Project; and 4) the Project is
18 economically feasible. Further, based on Staff’s experience with transmission CCN cases similar
19 to the present case, and to ensure the Project is in the public interest, Staff recommends the
20 following conditions be imposed by Commission order:

- 21 • Throughout the right-of-way acquisition process, ATXI will use all reasonable efforts to
22 abide by the depicted route on each of the parcels identified as of the filing of its
23 application as parcels over which an easement will be required, but will be allowed to
24 deviate from the depicted route in two scenarios:

- 1 a. First, if surveys or testing do not necessitate a deviation, ATXI may deviate from
2 the depicted route on a particular parcel if ATXI and the landowner agree, e.g.,
3 upon request of the landowner and ATXI's agreement with the request, or vice
4 versa.
5 b. Second, if ATXI determines that surveys or testing require a deviation, ATXI will
6 negotiate in good faith with the affected landowner and if agreement can be
7 reached ATXI may deviate from the depicted route on that parcel, as agreed with
8 the affected landowner.

9 With respect to any parcel other than the identified parcels where ATXI desires to
10 locate the line, whether because testing or surveys necessitate acquisition of an
11 easement on that parcel or for other reasons (e.g., a request from adjacent
12 landowners), ATXI will negotiate in good faith with the landowner of the affected
13 parcel over which ATXI has determined an easement is needed or desired and, if
14 agreement is reached, may deviate from the depicted route by locating the line on
15 the affected parcel but will notify the Commission of the deviation and parcels
16 affected prior to construction on that parcel.

17 If testing or surveys necessitate acquisition of an easement on such other parcel
18 and agreement is not reached, despite good faith negotiations, ATXI will file a
19 request with the Commission to allow it to deviate from the depicted route onto
20 the affected parcel and shall, concurrently with the filing of its request with the
21 Commission, send a copy of its request to the owner(s) of record of the affected
22 parcel via U.S. Mail, postage prepaid, as shown by the County Assessor's records
23 in the county where the affected parcel is located, or at such other address that has
24 been provided to ATXI by the owner(s). ATXI shall fully explain in that request
25 why ATXI determined the change in route is needed and file supporting testimony
26 with its request and the name(s) and 5 addresses of the owner(s) to whom it
27 provided a copy of its request. After Commission notice of the opportunity for a
28 hearing on the issue of whether the change in route should be approved is given to
29 the owner, Staff and OPC, and as well as an opportunity to respond, the
30 Commission will grant or deny the request.⁶²

- 31 • Absent a voluntary agreement for the purchase of the property rights, the transmission
32 line shall not be located so that a residential structure currently occupied by the property
33 owners will be removed or located in the easement requiring, for electrical code
34 compliance purposes, the owners to move or relocate from the property.
35 • Prior to the commencement of construction on a parcel, ATXI will secure an easement,
36 which will include a surveyed legal description showing the precise dimension, including
37 the length and width, for the permanent transmission line easement area for each affected
38 parcel. In addition, ATXI will track each easement grant by way of a spreadsheet that
39 identifies each parcel by Grantor and County, and which contains the recording
40 information for each parcel. Upon securing all necessary easements for the Project, ATXI
41 will file a copy of the spreadsheet with the Commission, to which a map will be attached.

⁶² Staff understands ATXI is committed to this procedure per the Direct Testimony of Craig Hiser, Page 6-7.

1 For each parcel, the map and the spreadsheet will include a unique indicator that allows
2 the Commission to see where on the map that parcel is located.

- 3 • ATXI shall follow the construction, clearing, maintenance, repair, and right-of-way
4 practices set out in Schedule CH-03 filed with Craig Hiser’s Direct Testimony.
- 5 • ATXI shall file with the Commission in this case all required government approvals and
6 permits—e.g., any applicable land disturbance permits, Missouri State Highway
7 Commission permits, or US Army Corps of Engineers permits—before beginning
8 construction on the part of the Limestone Ridge project where the approvals and permits
9 are required.
- 10 • ATXI shall file with the Commission any Memorandum of Agreement between ATXI
11 and MDC related to the proposed Route through Apple Creek Conservation Area.
- 12 • ATXI shall file with the Commission all pipeline interference studies performed as well
13 as any agreement between ATXI and the pipeline companies that have assets being
14 crossed or assets being paralleled by the Limestone Ridge Project.
- 15 • ATXI shall file with the Commission the annual report it files with FERC.
- 16 • Obtain acknowledgement from Ameren Missouri that they remain bound by the
17 following provision from the 3rd Order Modifying the 2012 Report and Order in Case No.
18 EO-2011-0128:

19 For transmission facilities located in Ameren Missouri’s certificated service
20 territory that are constructed by an Ameren affiliate and that are subject to
21 regional cost allocation by MISO, for ratemaking purposes in Missouri, the costs
22 allocated to Ameren Missouri by MISO shall be adjusted by an amount equal to
23 the difference between: (I) the annual revenue requirement for such facilities that
24 would have resulted if Ameren Missouri’s Commission-authorized ROE and
25 capital structure had been applied and there had been no construction work in
26 progress (CWIP) (if applicable), or other FERC Transmission Rate Incentives,
27 including Abandoned Plant Recovery, recovery on a current basis instead of
28 capitalizing pre-commercial operations expenses and accelerated depreciation,
29 applied to such facilities and (ii) the annual FERC-authorized revenue
30 requirement for such facilities. The ratemaking treatment established in this
31 provision will, unless otherwise agreed or ordered, end with the Commission’s
32 report and order at the conclusion of the case to be filed by Ameren Missouri on
33 or before March 15, 2023, regarding its continued participation in MISO, switch
34 to participation in another RTO, or operation as an [Independent Coordinator of
35 Transmission].⁶³

36 *Staff Witness: Claire M. Eubanks, PE*

37 **Attachment A - Public Comments received since August 20, 2021**

38 **Appendix 1 - Staff Credentials**

⁶³ Sponsoring Staff witness Kimberly K. Bolin.

Search Criteria/Related Case/Tracking No.:EA-2021-0087

Public Comment No.	Company Name	Name	City	State
P202100161	Ameren Transmission Company of Illinois-Investor(Electric)	Anonymous NA	Altenburg	MO
Comments: (DF)Caller is very concerned about the damage the Limestone Ridge Project may cause. She is worried about the health of the families, in proximity of the proposed high voltage lines. She is also concerned that during the construction of such a project, the roads and bridges will be damaged. She states that along with the endangered species of wildlife present in area, existing cattle farms will be disturbed.				
P202100190	Ameren Transmission Company of Illinois-Investor(Electric)	NA NA	Frohna	MO
Comments: (DF)Attached is Correspondence from Mr. Phil R. Dormeyer, Esquire, regarding the City of Frohna, Missouri and objections to the Limestone Ridge Project. Mr. Dormeyer is writing on behalf of the Mayor and Board of Alderman for the City of Frohna.				
P202100203	Ameren Transmission Company of Illinois-Investor(Electric)	Randy Schilling	NA	MO
Comments: (DF)See attached Public Comment.				
P202100206	Wabash Valley Power Association, Inc.-Cooperative(Electric)	Mary Scholl	Altenburg	MO

Comments: Objection to Ameren Request to Waiver in-person Public Hearing for Limestone Ridge Project We have had this project railroaded through with little input from the landowners and residents of Perry County. Further deviation from public input requirements will destroy any faith the public have in the efficacy of the project. Public, in-person hearings can safely be conducted after vaccinations for COVID have been administered and with social distancing.

P202100207	Ameren Transmission Company of Illinois-Investor(Electric)	Arlysss Schmidt	Altenburg	MO
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Comments: Ameren request to waiver public, in-person hearings re proposed Limestone Ridge Project routing option. I strongly object to this action. We have had this project railroaded through with little input from landowners of Perry County MO. Further deviation from public input requirements will only destroy faith the public will have in the efficacy of project. Public, in-person hearings are essential & can safely be conducted after vaccinations for COVID are administered.

P202100208	Ameren Transmission Company of Illinois-Investor(Electric)	Ron Schmidt	Alyenburg	MO
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Comments: I just learned that Ameren requested to waiver public in-person hearings on the proposed Limestone Ridge Project. What don't they want us to know. This whole project I don't understand why Amerem is building a line between two Wabash substations over Citizens Electric territory.

P202100209	Ameren Energy Communications, Inc.-(All)	Ron Schmidt	Altenburg	MO
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Comments: I just learned that Ameren requested to waiver public in-person hearings on the proposed Limestone Ridge Project. What don't they want us to know. This whole project I don't understand why Ameren is building a line between two Wabash substations over Citizens Electric territory. i

P202100210	Ameren Transmission Company of Illinois-Investor(Electric)	Bradley Schmidt	NA	MO
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Comments: (DF)See attached Public Comment.

P202100211	Ameren Transmission Company of Illinois-Investor(Electric)	Randy NA	NA	MO
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Comments: (DF)Petition - We, the residents of Perry County, Missouri, are opposed to Ameren's Limestone Ridge Project. We intend to take every legal action available to protect our property, our families, our heritage, and our future. 158 signatures, printed names and addresses attached. See attachment.

P202100212		Sara Bohnert	Altenburg	MO
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Comments: My family's property is going to adversely be affected by this project. There should be an in-person public hearing on this so that we can all be a part of the decision making. If it cannot be in-person right now, then it should be rescheduled so that we can attend. This will affect a lot of people, families, & businesses in a negative way for a long time.

P202100213	Citizens Electric Corporation-Investor(Electric)	Melvin Schilling	Frohna	MO
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Comments: We oppose approving Ameren's request to waive the public in-person meeting requirement for the Limestone Ridge Project proposed for Perry County. We believe that the COVID pandemic is being used to avoid public discussion of the Limestone Ridge Project. Ameren's attempt to substitute an online webinar for an in person public meeting has been deficient: rural East Perry County is lacking in adequate Internet service; the webinar format is unbalanced in the favor of the presenter, Ameren.

P202100214	Citizens Electric Corporation-Investor(Electric)	Jeffrey Schilling	Altenburg	MO
Comments: I am opposed to the granting a waiver to require an in public meeting about the Ameren Limestone Ridge Project. The current social restrictions arising from the COVID crisis should not be used by Ameren to deny local communities the opportunity to understand and debate the impact of the proposed 12-20 miles of new power line easements. This project involves the power of Eminent Domain, and every care needs be observed in its conduct.				
P202100216	Ameren Transmission Company of Illinois-Investor(Electric)	Tom Hannegan	Jefferson City	MO
Comments: Please see attached letter for comments pertaining to this case.				
P202100217	Citizens Electric Corporation-Investor(Electric)	gary pierce	Altenburg	MO
Comments: I am totally against high power transmission lines being planned for the Perry County / Altenburg area by Ameren Missouri/Citizens Electric and Wabash Power companies. These would be a huge detriment to our living and our health. This is highly opposed by everyone i have spoken to in regards to this proposal. If it were brought to vote (as it should be) it would be turned down immediately. If you would like more input on my behalf you are welcome to contact me. Gary Pierce sipropgroup@att.net				
P202100218	Ameren Missouri-Investor(Electric)	Edgar Emery	Lamar	MO
Comments: Regarding docket EA-2021-0087, I have been contacted by Mr. Randy Schilling regarding Ameren's request to waive the required public hearing. I agree with his concerns that an element of those affected will be unable to be fully informed without the in-person meeting. Individual landowners can attend such a meeting safely and are able to determine for themselves whether their attendance is justified. Please do not waive the in-person meeting requirement.				
P202100219	Ameren Transmission Company of Illinois-Investor(Electric)	Mark Petzoldt	n/a	MO
Comments: Public comments attached				
P202100220	Ameren Transmission Company of Illinois-Investor(Electric)	Bob Crites	n/a	MO
Comments: see attached				
P202100221	Ameren Transmission Company of Illinois-Investor(Electric)	Mary Crites	Altenburg	MO
Comments: (tb) Mary stated a public meeting needs to happen in this case so they can voice their concerns & ask questions. They think Ameren is trying to snowball this in with the pandemic. The case should be postponed until it is deemed safe to have the public meetings.				
P202100222	Ameren Transmission Company of Illinois-Investor(Electric)	Linda Strauser	Jackson	MO
Comments: (co) Customer called indicating she is apart of a Century Farm in this area. Her brother and sister in law bought land, and were going to build here; however, one of the lines will be running over their house. They also wont be able to hunt here because the woods will be deteriorated. They're all concerned. They would like for this to be put on hold until we can meet in person under our constitutional rights. There are lots of unique things about this community, and don't need high power lines.				
P202100223	Ameren Transmission Company of Illinois-Investor(Electric)	Rick Francis	Jefferson City	MO
Comments: Asks that the PSC reject the request from Ameren to waive in-person public meetings.				
P202100226		Randy Schilling	Frohna	MO
Comments: See attached				
P202100234	Ameren Transmission Company of Illinois-Investor(Electric)	randy schilling	St. Charles	MO
Comments: Several of East Perry's Family 100 year Centennial Farms will be impacted by the Limestone Ridge Project including the Bock, Buchheit, Degenhardt, Dreyer, Gerler, Grebing, Hunt, Kassel, Koenig, Leible, Lichtenegger, Lorenz, Meier, Meyer, Mueller, Oberndorfer, Palisch, Preusser, Roth, Ruehling, Schilling, Schmidt, Stueve, Unger, Weber and many others. Please support our heritage farms and families by routing around these properties. If this project is necessary, use existing right-of-ways.				
P202100250	Ameren Transmission Company of Illinois-Investor(Electric)	Randy Schilling	Saint Charles	MO
Comments: If East Perry needs more electric power capacity and greater resiliency, a better solution would be to upgrade the existing electricity grid using the existing transmission easements. With the closure of the Grand Tower Power Center, there is no longer a local power source. Spending \$60+ million on an orphaned 138kv (345kv) line and creating new right-of-ways through many of our heritage farms is unnecessary and cost too much.				

P202100251 Ameren Transmission Company of Randy Schilling Saint Charles MO
Illinois-Investor(Electric)

Comments: Many of the landowners impacted by this project have poor or no internet to properly participate in online activity about this project. Landowners deserve the right for an in-person meeting. Questions about this project are not being answered by Ameren and the project team. Having 3 electric utilities running redundant transmission lines across our heritage farms is excessive and not necessary. The community of East Perry needs more transparency on this project. www.saveeastperry.com

P202100283 Ameren Transmission Company of Diane Schmidt NA MO
Illinois-Investor(Electric)

Comments: (DF)Dear Sir: This project is not something we want on or near our property. Please do not approve the route. Diane Schmidt 573 824 5558

P202100433 Ameren Transmission Company of Melody Mouser NA MO
Illinois-Investor(Electric)

Comments: (DF)Ms. Mouser is against the proposed high voltage line, route, going through her property and/or her neighbors land. See attached email.

P202200034 Ameren Transmission Company of Tommy Petzoldt Frohna MO
Illinois-Investor(Electric)

Comments: (DF)East Perry Lumber Co. (EPLC) and Pondarosa Ranch Inc.(PRI) are opposed to the Application filed by Ameren Transmission Company of Illinois (ATXI) with the Missouri Public Service Commission (PSC) for a certificate of convenience and necessity. See attached for entire P.C.

Total Public Comment(s): 27

From:
Sent: Friday, December 18, 2020 7:23 PM
To: LimestoneRidgeProject
Cc: Silvey, Ryan; bill.eigel@senate.mo.gov; bob.onder@senate.mo.gov
Subject: Grand Tower Energy Shut Down/LimestoneRidge Project
Attachments: Correspondence to Ameren Missouri.pdf

Follow Up Flag: Follow up
Flag Status: Flagged

What impact does the shut down of Grand Tower Energy have on LimestoneRidge Project? This project is not needed and should not use eminent domain that would scar our heritage family farms and destroy the historic and scenic communities of Altenburg and Frohna, Missouri. If needed, this project should go south along existing railroad right of way. The railroad path is much shorter and would bypass much of the community. The negative economic impact to the tourism and local farming communities would be significant. Because this project simply cuts through East Perry County, there is little to no public benefit to the community. In fact, it is likely to be paid for with higher energy rates. This project should not be supported. For the majority of landowners impacted by this project, there has been no in person community meeting provided by Ameren. There are still some landowners that are unaware that this project will directly impact their property. This area has poor or no broadband internet and Zoom calls are not appropriate for life changing decisions that this project will bring to the community. Many of these farms have been in the same families going back to Missouri's statehood. If there where ever an agreement against the use of eminent domain, it would be the LimestoneRidge Project. Stay off the LimestoneRidge and take the common sense route by following the railroad south.

Please respond.

Sincerely,

Randy Schilling
Schilling Family Farms

https://thesouthern.com/news/local/grand-tower-energy-center-has-shut-down-company-releasing-few-details/article_ccf581c5-89db-5d2b-8444-1b1c126c0397.html?utm_medium=social&utm_source=email&utm_campaign=user-share

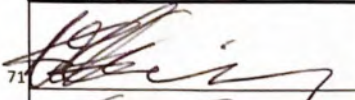
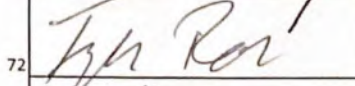
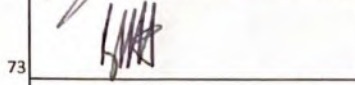
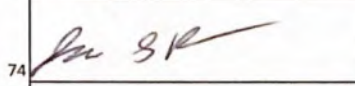
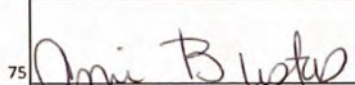
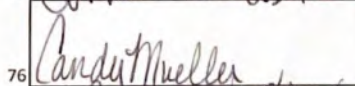
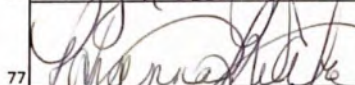
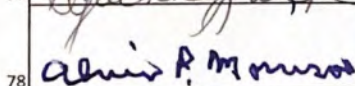
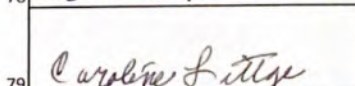
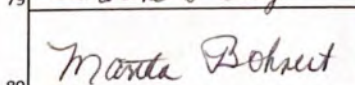
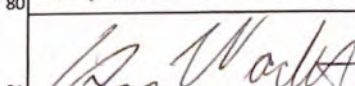
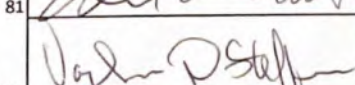
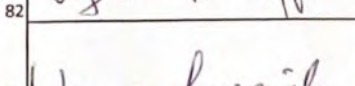
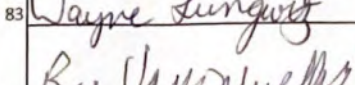
Sent from my iPhone

From: bschmidt@atnapa.com
To: [Missouri Public Service Commission](#)
Subject: limestone ridge project
Date: Friday, December 25, 2020 10:11:37 AM

My name is Bradley Schmidt. My property and my family will be effected by the limestone ridge project. I have recently learned that Ameren has requested to not have the in person public hearings, this is against standard procedure as I understand it. Do not take away our voice. I'm sure Ameren will cite covid as the reason for this request. We could stay 6 feet apart , there are mask available and now there is a vaccine. Treatments are getting better. If covid is such a big concern then the project should be delayed several months to get a better handle on covid. Don't let Ameren take my voice. There are a lot of problems with this project, lack of communication is one of the bigger problems. Make them have the public meetings. Thank you from Bradley Schmidt, land owner ,voter , tax payer and citizen.

Petition

We, the residents of Perry County, Missouri, are opposed to Ameren's Limestone Ridge Project. We intend to take every legal action available to protect our properties, our families, our heritage, and our future.

Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
71 	MEL SCHILLING	191 WORTHAMBER LN. FROHNA, MO. 63748
72 	Tyler Rovens	6556 main st Frohna MO 63748
73 	Ryan Hunt	552 Hwy C Altenburg MO 63732
74 	Jacob S Pohlman	10769 Hwy A Altenburg mo 63732
75 	Ami Bustos	9190 main st Altenburg MO 63732
76 	Candy Mueller	132 Hahn St. Altenburg MO 63732
77 	Roxanna Weber	1300 K ST Altenburg MO 63732
78 	Alvin P. Morrison	659 PCR 432 Frohna mo 63748
79 	Cardine Littge	239 Well St Altenburg MO 63732 Frohna
80 	Martka Behner	292 PCR 432 Altenburg, MO 63732
81 	Ben Wlachter	8576 Main St Altenburg, MO 63732
82 	Vaughn Steffens	711 PCR 439 Frohna Mo 63748
83 	Wayne Lungutz	667 PCR 432 Frohna, mo. 63748
84 	Harry Mueller	Frohna MO 11 11

Petition

We, the residents of Perry County, Missouri, are opposed to Ameren's Limestone Ridge Project. We intend to take every legal action available to protect our properties, our families, our heritage, and our future.

Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
15 <i>Bruce Engert</i>	Bruce Engert	11045 Hwy C Frohna Mo 63748
16 <i>Adam Meier</i>	Adam Meier	623 Hwy Y Altenburg MO
17 <i>Thomas Schierer</i>	THOMAS W. SCHIERER	117 PCR 452 ALTENBURG MO
18 <i>Russell Krull</i>	Russell Krull	68 Mill St Frohna 63748
19 <i>Mackensie Krull</i>	Mackensie Krull	68 mill st Frohna 63748
20 <i>Amanda Krull</i>	Amanda Krull	189 Sun Valley Court Jackson MO 63752
21 <i>Boyd France</i>	Boyd France	44 mill st Frohna MO 63748
22 <i>Jim Schmidt</i>	Jim Schmidt	1230 PCR 452 Altenburg MO 63732
23 <i>Ron Schmidt</i>	Ron Schmidt	401 PCR 450 Altenburg MO
24 <i>Andrew Lichtens</i>	Andrew Lichtens	1544 Hwy Y Altenburg MO,
25 <i>Karen Clifton</i>	Karen Clifton	1419 PCR 430 Frohna MO 63748
26 <i>Zachary Heest</i>	Zachary Heest	2638 PCR 430 Frohna, MO 63745
27 <i>Lynda Strauser</i>	Lynda Strauser	1304 Oak St Jackson, MO 63755
28 <i>Lorine Palisch</i>	Lorine Palisch	1708 Paul Revere Cape Girardeau, MO 63701

Petition

We, the residents of Perry County, Missouri, are opposed to Ameren's Limestone Ridge Project. We intend to take every legal action available to protect our properties, our families, our heritage, and our future.

Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
113 <i>Leslie L. Orton</i>	Leslie Leroy Orton	9112 Main St Altenburg
114 <i>Gary Sachs</i>	GARY SACHS	8404 Main St ALTEBURG, MO
115 <i>Tammy Palisich</i>	Tammy Palisich	8107 Main St, Altenburg, MO
116 <i>Jeff Dehler</i>		P.O. Box Altenburg, Mo
117 <i>Jim Dettmer</i>	Jaimie Dettmer	9177 main St Altenburg MO
118 <i>James Kuchw</i>	JAMES Kuchw	294 Wild Turkey Lane Frohna MO
119 <i>Sandy Bartels</i>	Sandy Bartels	294 Wild Turkey Lane Frohna MO
120 <i>James Schlimpert</i>	James Schlimpert	76 Redbird Lane Altenburg MO
121 <i>Larry Burroughs</i>	Larry Burroughs	345 PCR 426 Frohna, MO. 63748
122 <i>Joseph Koenig</i>	Joseph Koenig	1908 PCR 436 Frohna mo. 63748
123 <i>Holly Benton</i>	Holly Benton	10813 Highway C Frohna, MO 63748
124 <i>Stuart Ruchling</i>	Stuart Ruchling	Frohna MO 63748
125 <i>Ruth Burroughs</i>	Ruth Burroughs	345 PCR 426 Frohna, MO. 63748
126 <i>Tim Naeger</i>	TIM Naeger	9845 Altenburg MO 63732

Petition

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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
57 <i>Claudine Leimbach</i>	Claudine Leimbach	10057 Main St Attenburg Mo 63732
58 <i>Kimberly Rolens</i>	Kimberly Rolens	6550 Main St. Frohna, MO. 63748
59 <i>Leslie Fritsche</i>	Leslie Fritsche	70 Brookway Frohna, MO 63748
60 <i>Steve Schimpf</i>	Steve Schimpf	PO Box 61 no Attenburg
61 <i>Ron Roberts</i>	Ron Roberts	6556 MAIN STREET FROHNA
62 <i>Gerard R. Fienberg</i>	GERARD R. FIENBERG	8639 MAIN ST ALTENBURG, MO. 63732
63 <i>Jennifer A. Kull</i>	Jennifer A. Kull	68 Mill St Frohna, MO 63748
64 <i>Denise Morrison</i>	Denise Morrison	659 PCR 432 Frohna Mo 63748
65 <i>Michael Pitz</i>	Michael Pitz	120 PCR 451 Frohna MO
66 <i>Warren Schmidt</i>	WARREN SCHMIDT	9465 Main St Attenburg MO 63732
67 <i>Richard Scholl</i>	Richard Scholl	1335 PCR 428 Frohna Mo 63748
68 <i>Colleen Steffens</i>	Colleen Steffens	711 PCR 439 Frohna MO 63748
69 <i>Mike Roth</i>	MIKE ROTH	248 PCR 337 Frohna MO. 63748
70 <i>Mary Schilly</i>	MARY SCHILLY	191 NORTHANGER FROHNA MO 63748

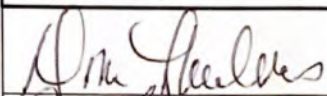

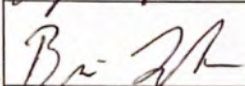
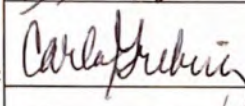
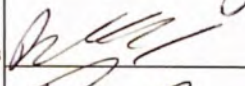
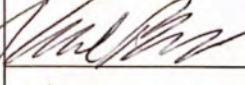
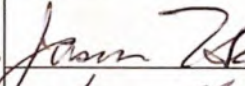
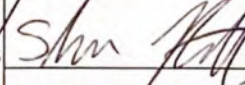
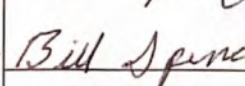
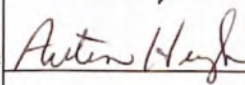
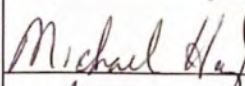
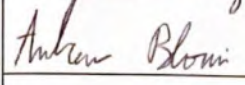
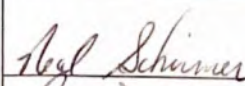
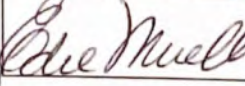
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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
199 Dan Petzoldt	Dan Petzoldt	1498 Hwy 4 Attenburg, MO. 63732
100 Robert Martin	Robert Martin	9335 Main St. Attenburg MO, 63732
101 Lori Schlimpert	Lori Schlimpert	76 Redbird Ln Attenburg, mo 63732
102 Lawson Rutgefelt	LAWSON RUTGELT	6341 US HY 61 JACKSON, MO 63755
103 Juanita Kaufmann	Juanita Kaufmann	155 Fair Rd Attenburg MO 63732
104 Ronald Wiggins	ROSWALD WIGGINS	PO BOX POCAHONTAS MO 63779
105 Jeff Schilling	JEFF SCHILLING	631 STONEHILL LN 63732
106 Kirby Klaus	Kirby Klaus	12210 S Hwy 61 Uniontown mo. 63783
107 Cathy Klaus	Cathy Klaus	12210 S Hwy 61 Uniontown. mo. 63783
108 Tim Buchheit	Tim BUCHHEIT	602 S. Main Perryville Mo 63775
109 Heather Kassel	Heather Kassel	9096 Main St Attenburg MO 63732
110 Travis Kassel	Travis Kassel	9094 Main St Attenburg MO 63732
111 Joseph Holt	Joseph Holt	8949 Main Attenburg
112 Michele Holt	Michele Holt	8949 Main Attenburg

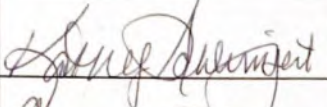
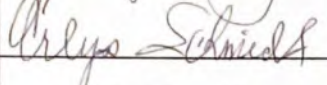
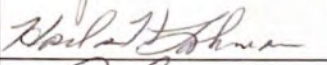
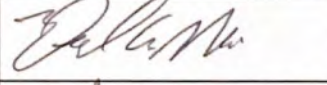
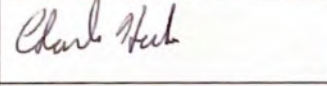
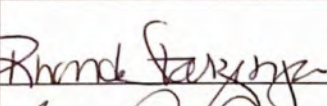
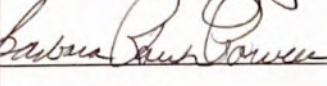
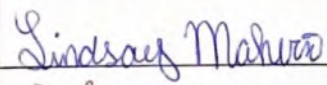
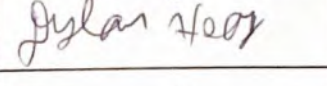
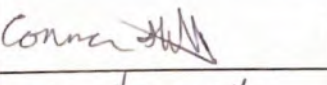
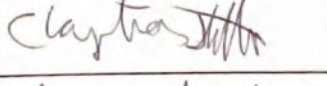
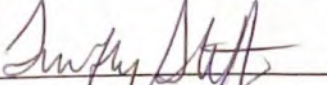
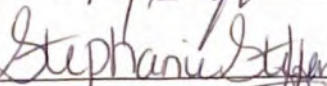
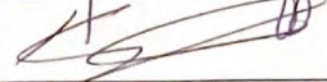
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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
659 	Donna Lueders	4255 Hwy. A Uniontown, MO 63783
660 	Doyle Lueders	4255 Hwy A Uniontown mo 63783
661 	Brian Lohmann	983 PCR 432 Frohna mo 63748
662 	Carla Grebner	8349 Main St Altenburg 63732
663 	David Adams	9084 main Altenburg mo 63732
664 	Daniel Bowers	10004 Main Street Altenburg MO 63732
665 	Jason Hedt	677 PCR 414 Frohna MO 63748
666 	Shannon Retzlaff	39 Greentop Lane Frohna, MO, 63748
667 	BILL SPENCER	3944 PCR 438 FROHNA MO 63748
668 	Autumn Hughey	P.O. Box 24 Altenburg, MO 63732
669 	M. chael Hughey	P.O. Box 24 Altenburg MO 63732
670 	Andrew Blouin	866 Hwy C Altenburg MO, 63732
671 	Neal Schirmer	526 PCR 446 Altenburg mo 63732
672 	Edith Muelber	PER 9401 PCR 438 Frohna MO 63748

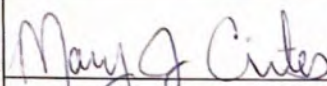
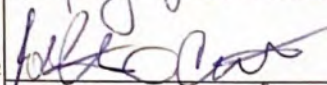
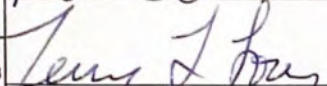
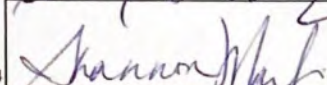
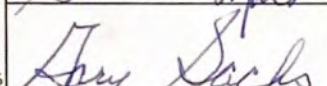
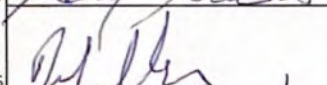
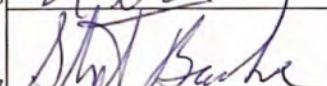
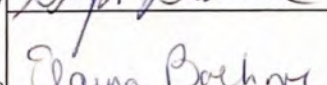
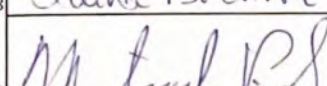
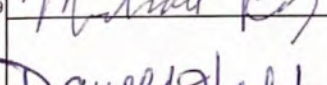
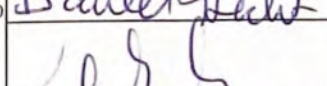
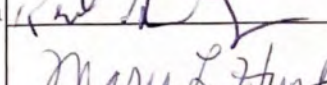
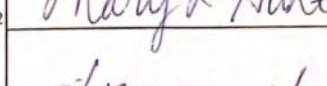
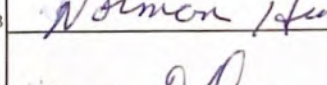
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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
85 	KATHY Schlimpert	9303 Main St. Altenburg
86 	Arlyss Schmidt	401 PCR 450 Altenburg
87 	HARLAN H. LOHMAN	181 PROSSWIND LN Perryville Mo
88 	David Mahurin	8597 Main St. Altenburg, MO
89 	Charles Hecht	2505 PCR Frohna MO
90 	Rhonda Starzinger	417 Marnoseann Dr 63704 Apt 8, Cape Girardeau MO
91 	Barb Powell	250 Church St Jackson MO 63755
92 	Lindsay Mahurin	8597 main St Altenburg, MO 63732
93 	DYLAN HECHT	2505 PCR 430 Frohna MO 63748
94 	Connor Steffens	P.O. Box 41 Frohna, MO 63748
95 	Clayton Steffens	P.O. BOX 41 Frohna, MO 63748
96 	Timothy Steffens	PO Box 41 Frohna MO 63748
97 	Stephanie Steffens	PO Box 41 Frohna 63748
98 	Kyle A. Schmidt	150 WEST ST. Frohna MO 63748

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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
1 	Mary J. Crites	153 Amethyst Lane Jackson, MO 63755
2 	Bob Crites	153 Amethyst Lane Jackson, MO 63755
3 	Terry Lorenz	396 PCR 343 Farrar, MO
4 	Shannon Martin	9335 Main St Attenburg, MO 63732
5 	Gary Sachs	9404 Main St Attenburg, MO 63732
6 	NEAL SCHERREN	10135 STATE Hwy C ATTENBURG
7 	Stephen Boehme	3328 PCR 438 Frohna MO, 63748
8 	Elaine Boehme	3328 PCR 438 Frohna Mo 63148
9 	Michael Pitz	120 PCR 451 Frohna Mo
10 	Darrell Becht	6619 PCR 430 Frohna MO 63748
11 	Kent Greban	8349 Main Street Attenburg Mo 63732
12 	Mary L Hunt	552 Hwy C Attenburg MO 63732
13 	NORMAN R HUNT	552 Hwy C
14 	BRIAN DRZYCA	1001 SUNSET DR. PERRYVILLE MO

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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
645 <i>Angela Oberndorfer</i>	Angela Oberndorfer	10949 Hwy A Altenburg 1370 Hwy C
646 <i>D. B.</i>	David Braeuner	Altenburg MO 63732 9451 Main
647 <i>Carol Wunderlich</i>	Carol Wunderlich	Altenburg MO 63732 8992 MAIN
648 <i>Glenn Borgfield</i>	GLENN BORGFIELD	ALTENBURG, MO 63732 11083 Hwy A
649 <i>Kathy Haertling</i>	Kathy Haertling	Altenburg, Mo 1369 Hwy C
650 <i>Mark Petoldt</i>	MARK PETOLDT	Altenburg, MO 63732
651 <i>Jessica Lohmann</i>	JESSICA LOHMANN	983 PCR 432 Frohna MO 63748
652 <i>Sally Buerck</i>	Sally Buerck	168 Church St. Altenburg Mo 63732 3442 PCR 438
653 <i>Julie Spencer</i>	Julie Spencer	Frohna, Mo 63748
654 <i>Daniel Foster</i>	Daniel Foster	9144 Main St. Altenburg, MO 63732
655 <i>Garry Lungwitz</i>	GARRY LUNGWITZ	5652 main Frohna Mo 63748
656 <i>Doris Lungwitz</i>	DORIS LUNGWITZ	5652 Main Frohna Mo 63748
657 <i>Gary Schlichting</i>	Gary Schlichting	3969 PCR 438 Frohna, Mo. 63748
658 <i>Carla Braeuner</i>	Carla Braeuner	1370 Hwy Altenburg MO 63732

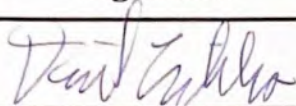
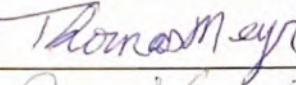
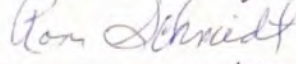
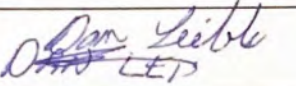
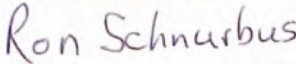
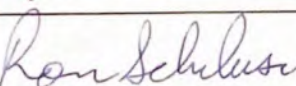
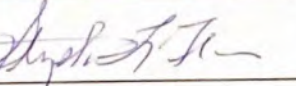
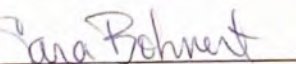

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	Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
127		DELLA Dreyer	36 SAXON Mem Dr
128		Kimberly D Fritsch	70 Birdsong Dr. Frohna MO 63748
129		Josh Engert	1688 PCR 334
130		Monica Robert	5604 Main St. Frohna Mo 63748
131	MARK ROBERT		5604 MAIN ST FROHNA
132		BRONENKANT GARRETT	5604 main Street FROHNA, MO
133	Darry Pierce	GARY PIERCE	1151 Hwy C ALTENBURG
134	Larry Pierce	Larry Pierce	1151 Hwy C ALTENBURG
135	Michael F Pierce	MICHAEL F Pierce	1151 Hwy C ALTENBURG
136		Kent Luckey	845 PCR 454 Altenburg MO 63732
137	Laura Luckey	Laura Luckey	845 PCR 454 Altenburg, MO 63732
138		Earl Weber	1155 PCR 430 Frohna MO 63748
139			
140			

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Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
29 	David Lichtenberg	2267 Hwy Y Frohna MO 63748
30 	Thomas Meyer	9587 Main St Altenburg MO 63732
31 	Ron Schmidt	401 PER 450 824-5216 63732
32 	DAN LEIBLE	2884 HWY 4 FROHNA MO 824-5771
33 		
34 	Ron Schnurbusch	180 Astilbe LN Jackson MO 63755
35 	Stephen L Thurm	512 West St Frohna Mo 63748
36 	Sara Bohnert	CR 456 Altenburg, MO 63732
37 	Randall Schilling	678 STONESHILL Altenburg MO 63732
38		
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	Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
43	<i>Rodney Barber</i>	Rodney Barber	7138 Main St Altenburg Mo
44	<i>Mary F. Scholl</i>	MARY "FRAN" SCHOLL	633 Chestnut Oak, Altenburg Mo 63732
45	<i>Terry L Scholl</i>	TERRY (LIN) SCHOLL	" " " "
46	<i>[Signature]</i>	Bradley Schmidt	1933 Hwy Y Frohna Mo. 63748
47	<i>Cynthia Schmidt</i>	Cynthia Schmidt	1933 Highway Y Frohna, MO 63748
48			
49			
50			
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Petition

We, the residents of Perry County, Missouri, are opposed to Ameren's Limestone Ridge Project. We intend to take every legal action available to protect our properties, our families, our heritage, and our future.

Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
183 <i>James Oberdorfer</i>	James Oberdorfer	1094 PCR 428 Frohne, Mo.
184 <i>Kari Boettcher</i>	Kari Boettcher	# 454 Hwy C Attenburg, MO
185 <i>Julie Wilson</i>	Julie Wilson	8272 main St. Attenburg MO
186 <i>Mike Oberdorfer</i>	Mike Oberdorfer	5626 Main Street Frohne, MO 63748
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Petition

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	Signature	Printed name (please make legible)	Printed address (Address is required for legal petition)
673	<i>Dale Roth</i>	Dale Roth	1140 Hwy A Attenburg MO 63732
674	<i>Faye Schmidt</i>	Faye Schmidt	1230 PCR 452 Attenburg, 63732
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Name Mark Petzoldt

Email * markpetzoldt1475@gmail.com

Phone (573) 768-5593
Number

Name Citizens Electric Corporation
of
Utility *

Feedback/Comment *

Case Number is EA-2021-0045

In regards to stopping the public meetings with the Limestone Ridge Project, I believe that it is in the best interest of the community that we have open discussions about this project. This project will forever change the serenity of this historical landscape, the East Perry County region has an unique heritage, these proposed routes are going to be situated on lands that many are Century Farms. Land that we have grown up on, and cherished the beauty of this area. This area has been established since 1839. Your project will destroy this heritage.

And actually what will this project really do for East Perry County.. nothing, but destroying the landscape with towers that are transmitting electric from Illinois to P&G... Your first promotion said that it would help the area. Actually how will it, help this immediate area? And what is the environmental impact going to be with this kind of voltage running through our landscape?

The community needs to have input.

Respectfully,
Mark Petzoldt

OPC team,

I am contacting you in reference to the Limestone Ridge Project. This project impacts East Perry and Cape county residents and landowners.

I recently received word that Ameren has petitioned the Public Service Commission to allow Ameren not to hold public in person meetings for this project.

The impacted communities are concerned that up to this point our voices have been silenced and muted by using a global pandemic and the safety measures related to this pandemic to advance this project past the point where our voices can be heard.

This project impacts entire communities in a historic area. Many farms and homes along the proposed route are heritage farms and homesteads that have been in families since it was settled in 1839. The heritage of this area has been documented in books and film that tell of the efforts made to preserve the history and culture passed down through generations. Many families have worked, lived and died on these family homesteads and should be given the chance to be heard.

Please contact me with any information or advice you can share regarding this project.

Thank you I'm advance.

Sincerely,

Bob Crites
Lead Engineer
Spartech LLC

I am requesting that the Public Service Commission reject Ameren Transmission Company of Illinois's request to waive a Commission Rule that would require it to conduct an in-person public meeting with affected landowners before filing its application for a certificate of convenience and necessity to construct and operate a transmission line in parts of Perry and Cape Girardeau Counties, Missouri. Many of the landowners are elderly and with poor or no internet and are not properly informed about this project. An in-person meeting is required to properly educate the community about the impacts that this project will have on the East Perry County community. Many of these farms have been in the same families going back to the mid 1800's and the landowners deserve the right to be fully informed about this project. Please vote NO to the request from Ameren Transmission Company of Illinois. COVID is no excuse to not to properly inform Missouri citizens about their property rights.

Sincerely,

Randy Schilling

Schilling Family Farms

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) Case No. EA-2021-0087
of Public Convenience and Necessity to Construct,)
Install, Own, Operate, Maintain, and Otherwise)
Control and Manage a 138 kV Transmission Line)
and associated facilities in Perry and Cape)
Girardeau Counties, Missouri)

AFFIDAVIT OF SEOUNG JOUN WON, PhD

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SEOUNG JOUN WON, PhD and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Rebuttal Report*; and that the same is true and correct according to his best knowledge and belief.

Further the Affiant sayeth not.

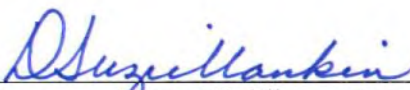


SEOUNG JOUN WON, PhD

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August 2021.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070



Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION
OF THE STATE OF MISSOURI

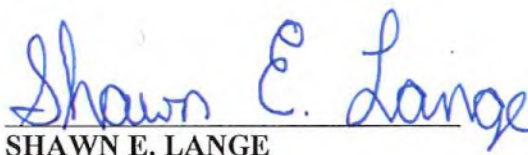
In the Matter of the Application of Ameren)
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of Public Convenience and Necessity to Construct,)
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Control and Manage a 138 kV Transmission Line)
and associated facilities in Perry and Cape)
Girardeau Counties, Missouri)

AFFIDAVIT OF SHAWN E. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SHAWN E. LANGE and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Rebuttal Report*; and that the same is true and correct according to his best knowledge and belief.

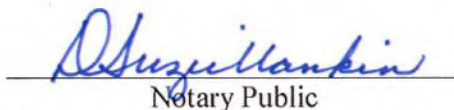
Further the Affiant sayeth not.


SHAWN E. LANGE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August 2021.

D. SUZIE MANKIN Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: April 04, 2025 Commission Number: 12412070


Notary Public

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Ameren)
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Control and Manage a 138 kV Transmission Line)
and associated facilities in Perry and Cape)
Girardeau Counties, Missouri)

AFFIDAVIT OF SARAH L.K. LANGE

STATE OF MISSOURI)
) ss.
COUNTY OF COLE)

COMES NOW SARAH L.K. LANGE and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Rebuttal Report*; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Sarah L.K. Lange
SARAH L.K. LANGE

JURAT

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 24th day of August 2021.

D. SUZIE MANKIN
Notary Public - Notary Seal
State of Missouri
Commissioned for Cole County
My Commission Expires: April 04, 2025
Commission Number: 12412070

D. Suzie Mankin
Notary Public

