

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

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

**MOTION OF WIND ON THE WIRES TO SUBMIT  
DIRECT TESTIMONY OF MICHAEL GOGGIN  
IN SUPPORT OF THE APPLICATION**

COMES NOW Wind on the Wires, by its counsel, and hereby petitions the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires to file direct testimony in the above captioned proceeding pursuant to 4 CSR 240-2.130(7) or as a waiver to the Commission rules pursuant to 4 CSR 240.2015. In support of this motion, Wind on the Wires states and alleges the following:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Our Board of Directors and members are comprised of wind and solar developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Wind on the Wires operate plants in Missouri and also have contracts to provide energy to utilities in Missouri.

2. Based on the foregoing, Wind on the Wires has an interest in the Application of Ameren Transmission Company of Illinois (ATXI) in this proceeding. Wind on the Wires will be directly impacted by the decision to grant or deny ATXI a certificate of convenience and necessity to build, own and operate a 345 kilovolt transmission line from Palmyra, Missouri to the Iowa border and its related substation. If the certificate of need is not granted, Wind on the Wires' members will be materially harmed because they lose the opportunity to build wind energy facilities in Missouri, Iowa, Illinois and other MISO states that could deliver cost effective renewable energy into Missouri, and other states served by MISO.
3. Wind on the Wires has submitted a petition to intervene in the instant proceeding.
4. Wind on the Wires will be supporting the certificate of convenience and necessity sought by ATXI.
5. On September 15, 2017 ATXI filed a "Motion for Adoption of Procedural Schedule and Motion for Expedited Treatment." If granted, said motion does not provide a date for filing supportive testimony but does have rebuttal testimony being filed on October 25, 2017. Submitting supportive direct testimony at this time is consistent with the motion filed by ATXI; it creates judicial efficiency and expedites the proceeding by allowing opponents of the application to respond to our testimony in rebuttal instead of surrebuttal.
6. To the extent necessary to allow Wind on the Wires to submit direct testimony, there is good cause to waive 4 CSR 240-2.130(7) pursuant to 4 CSR 240.2015. Allowing Wind on the Wires to file direct testimony will promote judicial efficiency and expedite these proceedings, as set forth in paragraph 5, herein.

Wherefore, Wind on the Wires seeks permission to submit the attached “Direct Testimony of Michael Goggin” in the above captioned case.

Respectfully submitted,

/s/ Deirdre K. Hirner  
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*Attorney for Wind on the Wires*

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on October 6, 2017.

/s/ Deirdre K. Hirner  
Attorney for Wind on the Wires