## 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 Convenience and Necessity under Section	)	) File No. EA-2022-0099
393.170 RSMo. Relating to Transmission	)	
Investments in Southeast Missouri.	)	

# MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION STATEMENT OF POSITION

**COMES NOW** the Missouri Joint Municipal Electric Utility Commission (MJMEUC), and hereby submits its Statement of Position, as follows:

#### **STATEMENT OF POSITION**

MJMEUC supports the *Statement of Position of Ameren Transmission Company of Illinois (ATXI)* in this litigation which states the numerous benefits of the Project to all parties and customers of this Project and the inequity of pancaked rates to the customers of the Sikeston Board of Municipal Utilities. *See also Surrebuttal Testimony of John Grotzinger*.

As to the issue of whether the Project can and should be placed in a special Midcontinent Independent System Operator transmission pricing zone, in addition to the concerns raised by ATXI, MJMEUC does not believe that MISO Transmission Owners Agreement will allow ATXI to create such a zone. *See Surrebuttal Testimony of John Krajewski*.

WHEREFORE, MJMEUC hereby prays that this Commission grant the relief requested, pursuant to any jurisdiction the Commission may possess in this matter, and submits its Statement of Position.

Respectfully Submitted,

### HEALY LAW OFFICES, LLC

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**ATTORNEYS FOR MJMEUC** 

#### **CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed, emailed or hand-delivered to all parties on the official service list for this case on this 4<sup>th</sup> day of May, 2022.

/s/ Douglas L. Healy
Douglas L. Healy