

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

In the Matter of the Application of Ameren Transmission)
Company of Illinois for Other Relief or, in the Alternative,)
a Certificate of Public Convenience and Necessity)
Authorizing it to Construct, Install, Own, Operate,) File No. EA-2015-0146
Maintain and Otherwise Control and Manage a)
345,000-volt Electric Transmission Line from Palmyra,)
Missouri, to the Iowa Border and Associated Substation)
Near Kirksville, Missouri.¹)

**ATXI'S MOTION FOR RECONSIDERATION BY THE FULL COMMISSION OF THE
ORDER GRANTING MOTION TO AMEND PROCEDURAL SCHEDULE**

COMES NOW Ameren Transmission Company of Illinois (“ATXI” or the “Company”),
by and through counsel, and under 4 CSR 240-2.160(2), files this limited Motion for
Reconsideration (by the full Commission, if necessary) of a portion of the Regulatory Law
Judge’s delegated November 25, 2015 *Order Granting Motion to Amend Procedural Schedule*
 (“Order”). In support of its motion for reconsideration, ATXI states as follows:

1. In its November 24, 2014 Response in Opposition to Motion to Amend
Procedural Schedule, ATXI explained its opposition to moving the evidentiary hearing dates, but
also indicated that it was mindful that the Commission generally attempts to accommodate
scheduling concerns when it can. ATXI also acknowledged the Staff’s and the Office of the
Public Counsel’s (“OPC”) lack of opposition to the proposed schedule change.

2. However, ATXI also pointed out the significantly negative impact on its ability to
meet the in-service deadline established by MISO, even if an order granting a CCN is issued
within a few weeks after the last event to occur under the proposed revised procedural schedule.
A prime example of the difficulty the delays the evidentiary hearing rescheduling and a briefing

¹ The project for which the CCN is sought in this case also includes a 161,000-volt line connecting to the associated substation to allow interconnection with the existing transmission system in the area.

schedule deep into March 2016 presents for completing the project by the in-service date is the need to complete studies of certain endangered bat species that may nest along part of the proposed route. Those studies can only be completed between May 15th to August 15th when the bats are in their summer roosting habitat, and can only be effective if sufficient right-of-way has been obtained. Every week of delay in the schedule delays right-of-way acquisition activities and places the ability to complete the required surveys in jeopardy. If the survey window is missed, the entire project may be delayed a year.

3. ATXI also noted that the purported reasons given by Neighbors United for the revised schedule did not justify an open-ended and unlimited opportunity to conduct further discovery that could have been conducted at any time over the past several months.

4. For those reasons, as more fully outlined in ATXI's November 24 Response, ATXI requested the Commission (if the change in the evidentiary hearing dates requested by Neighbors United was to be made) to modify the briefing deadlines proposed by Neighbors United and to adopt a couple of alternative terms regarding discovery, as follows:

- Set the deadline for initial briefs to February 19, 2016, and for reply briefs to March 4, 2016.²
- Set the last day to notice depositions to December 28, and set a deadline for depositions to be completed of January 15, 2016.
- Set the last day to request written discovery to December 11, 2015, and limit further written discovery to discovery directed toward new information contained in surrebuttal testimony only.
- Set the deadline for filing any motions to compel discovery to December 31, 2015.

² The hearing transcripts should be expedited so that they are fully available no later than February 1, 2016.

5. The Company hereby requests reconsideration of the Order (by the full Commission, if necessary), but only as to those items reflected in the bullet points set forth in ¶ 3 above. The Company also wishes to reiterate the importance of avoiding further delays in the schedule, and of a prompt ruling once briefing is complete. The revised evidentiary hearing schedule has added approximately three months to the processing of this case beyond that requested when ATXI filed its application, and if the briefing schedule is not shortened as requested herein, more than two months will be added by pushing the possibility of a Commission order until well into April, 2016. To put that into perspective, such a schedule will have taken as long as it takes to complete an entire general rate case before the Commission.

WHEREFORE, ATXI respectfully requests reconsideration (by the full Commission if necessary) of the Order, and requests that the Order be modified as set forth in the bulleted items in ¶ 3 above.

Respectfully submitted,

/s/ James B. Lowery

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CERTIFICATE OF SERVICE

I do hereby certify that a true and correct copy of the public version of the foregoing Motion to Compel Discovery has been e-mailed, this 30th day of November, 2015, to counsel for all parties of record.

/s/ James B. Lowery

**An Attorney for Ameren Transmission
Company of Illinois**