

**BEFORE THE PUBLIC SERVICE COMMISSION  
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 ) **File No. EA-2015-0146**  
Necessity Authorizing it to Construct, )  
Install, Own, Operate, 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. )

**POSITION OF IBEW LOCAL 1439 ON AMENDED PROCEDURAL SCHEDULE**

Comes now IBEW Local 1439 (Local 1439), through counsel, in response to the Commission's Order dated December 2, 2015, and states as follows:

1. Local 1439 shares Ameren's concern that any delay in the hearing and resolution of this matter – now unavoidable – be made as minimal as possible so that it does not jeopardize the viability of the construction and operation of the transmission line.

2. Local 1439 also joins Ameren in requesting a closer examination of the necessity of the discovery and delay requested by Neighbors United.

WHEREFORE, Local 1439 supports stricter discovery limitations and tighter briefing deadlines than those recently approved by the Commission.

Respectfully submitted,

/s/ Sherrie Hall  
SHERRIE HALL, MBN 40949  
EMILY R. PEREZ, MBN 62537  
HAMMOND and SHINNERS, P.C.  
7730 Carondelet Avenue, Suite 200  
St. Louis, Missouri 63105  
(314) 727-1015 (Telephone)  
(314) 727-6804 (Fax)

sahall@hammondshiners.com (email)  
eperez@hammondshiners.com (email)  
Attorneys for IBEW Local 1439

**Certificate of Service**

The undersigned certifies that a true and correct copy of the foregoing was served on December 3, 2015, by United States mail, hand-delivery, email, or facsimile upon all parties by their attorneys of record.

/s/ Sherrie Hall