

**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.)

IBEW 1439's POST-HEARING BRIEF

Comes now International Brotherhood of Electrical Workers Local Union 1439 (IBEW 1439), through counsel, and respectfully submits its Post-Hearing Brief in the above referenced case.

1. *Does the Commission possess authority to approve ATXI's application?*

Yes. The Commission stated in its Order Regarding Motion to Dismiss that the Commission is the proper authority to issue a certificate of convenience and necessity ("CCN") according to Section 393.170.1, RSMo, and that ATXI is a proper entity to receive a CCN from the Commission.

2. *Does the evidence establish that the Mark Twain transmission line project, as described in ATXI's application in this docket, and for which ATXI is seeking a certificate of convenience and necessity ("CCN"), is "necessary or convenient for the public service within the meaning of that phrase in section 393.170, RSMo?"*

Yes. The Commission should grant ATXI a CCN, as sought in the Application in this docket. The Mark Twain Transmission project would have a positive economic impact on all communities and counties along the transmission line's route through the creation of jobs both in the areas of construction and maintenance and operations, as well as through a

commensurate on-going increase in property taxes. (Rebuttal Testimony of Michael Walter (Walter), p. 2, l. 28-p. 3, l. 37)

Moreover, additional power lines and an updated transmission system are necessary to carry the increasing load of renewable energy. (Walter, p. 3, ll. 38-43)

3. Do §§ 393.170 and 229.100, RSMo., require that before the Commission can lawfully issue the requested CCN the evidence must show the Commission that where the proposed Mark Twain transmission line project will cross public roads and highways in that county ATXI has received the consent of each county to cross them? If so, does the evidence establish that ATXI has made that showing?

No. This was already decided by the Commission in the November Order.

4. If the Commission decides to grant the CCN, what conditions, if any, should the Commission impose?

IBEW 1439 does not believe conditions, beyond those ATXI has consented to, need to be imposed.

Respectfully submitted,

/s/ Sherrie A. Hall
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Certificate of Service

The undersigned certifies that a true and correct copy of the foregoing was served on February 24, 2016, by United States mail, hand-deliver, email, or facsimile upon all parties by their attorneys of record as disclosed by the pleadings and orders herein.

/s/ Sherrie Hall