BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Metter of the Application of Ameron	`	
In the Matter of the Application of Ameren)	
Transmission Company of Illinois for a)	
Certificate of Convenience and Necessity)	
Authorizing it to Operate and Maintain an)	Case No. EA-2021-0167
Interconnection of the High Prairie Wind)	
Project with the Mark Twain Transmission)	
Line.)	

AMEREN TRANSMISSION COMPANY OF ILLINOIS' RESPONSE TO STAFF RECOMMENDATION

COMES NOW Ameren Transmission Company of Illinois ("ATXI"), and for its response to the Staff Recommendation to Approve Application filed on January 19, 2021, states as follows:

- 1. ATXI filed its Application in this case seeking a Commission determination that an additional certificate of convenience or necessity ("CCN") to operate and maintain an interconnection to the Mark Twain Transmission line (i.e., the Hughes Switchyard) was unnecessary or, alternatively, seeking an order granting an additional CCN.
- 2. In accordance with the Commission's orders in response to ATX's Application, the Commission's Staff filed its Recommendation opining that an additional CCN should be granted, that the 60-day notice requirement under Commission Rule 20 CSR 4240-4.017 be waived, and that certain other waivers, consistent with waivers previously granted to ATXI (given that it serves no retail customers and has no Missouri retail rates) be granted.
- 3. ATXI requests that the Commission issue its order granting the CCN as recommended by the Staff, as well as the waivers also addressed in Staff's recommendation.

WHEREFORE, ATXI submits this Response and prays that the Commission issue an order in accordance with paragraph 3 hereof.

Dated: February 4, 2021

Respectfully submitted,

JBL LAW, LLC

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Attorneys for Ameren Transmission Company of Illinois

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the
Staff of the Commission and the Office of the Public Counsel via electronic mail (email) on this 4th day
of February, 2021.

/s/ James B. Lowery James B. Lowery