## 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-2015-0145
Maintain and Otherwise Control and Manage a	)	
345,000-volt Electric Transmission Line in Marion	)	
County, Missouri, and an Associated Switching Station	)	
Near Palmyra, Missouri.	)	

## RESPONSE TO STAFF RECOMMENDATION

COMES NOW Ameren Transmission Company of Illinois (ATXI), by and through its counsel, and for its response to the recommendation filed by the Staff on April 20, 2015 ("Staff Recommendation") states as follows:

- 1. If the Commission determines that it possesses jurisdiction to grant a certificate of public convenience and necessity ("CCN") to ATXI for the Missouri portion of the Illinois Rivers Project which is the subject of ATXI's Application in this case and grants the CCN instead of dismissing the Application for lack of jurisdiction, ATXI agrees to the condition recommended by the *Staff Recommendation*, to wit: ATXI agrees to follow the construction, clearing, maintenance, repair, and right-of-way practices regarding landowners and land management outlined in its response to Staff Data Request No. 22, which is appended to the *Staff Recommendation*.
- 2. As outlined in its Application, and as also recommended by the Staff in the *Staff Recommendation*, ATXI also requests that any Commission order granting a CCN to ATXI for the Illinois Rivers Project also grant ATXI a waiver of (a) the rate schedule filing requirement of 4 CSR 240-3.145, (b) the annual reporting requirement of 4 CSR 240-3.165, (c) the depreciation study requirement of 4 CSR 240-3.175, and (e) the reporting requirements of 4 CSR 240-

3.190(1), (2) and 3(A)-(D). As provided for in the Application, and as also recommended by the Staff, ATXI confirms that it agrees to file with the Commission the annual report it files with the Federal Energy Regulatory Commission.

Respectfully submitted,

/s/ James B. Lowery

James B. Lowery, Mo. Bar #40503
Michael R. Tripp, Mo. Bar #41535
SMITH LEWIS, LLP
P.O. Box 918
Columbia, MO 65205-0918
(T) 573-443-3141
(F) 573-442-6686
lowery@smithlewis.com
tripp@smithlewis.com
Attorneys for Ameren Transmission Company of Illinois

## **CERTIFICATE OF SERVICE**

I do hereby certify that a true and correct copy of the public version of the foregoing Response has been e-mailed this 24<sup>th</sup> day of April, 2015, to all parties of record.

/s/ James B. Lowery

An Attorney for Ameren Transmission Company of Illinois