

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

In the Matter of the Application of Ameren Transmission)
Company of Illinois for a Certificate of Public)
Convenience and Necessity Authorizing it to Construct,)
Install, Own, Operate, Maintain and Otherwise Control) Case No. EA-2017-0345
and Manage a 345-kV Electric Transmission Line from)
Palmyra, Missouri, to the Iowa Border and an Associated)
Substation Near Kirksville, Missouri)

MOTION TO INTERVENE of WIND ON THE WIRES

COMES NOW Wind on the Wires, by its counsel, and hereby moves the Public Service Commission of the State of Missouri ("PSC" or "Commission") for an order permitting Wind on the Wires to intervene in the above captioned proceeding under 4 CSR 240-2.075 as an interested entity. In support of this motion, Wind on the Wires states and alleges as follows:

1. Wind on the Wires is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Wind on the Wires is a collaborative organization dedicated to renewable energy's fair access to the electric transmission system and market throughout the Midwest. Wind on the Wires' Board of Directors and members are comprised of wind and solar developers, environmental organizations, wind energy experts, tribal representatives, clean energy advocates, and businesses providing goods and services to the wind industry in Missouri and across the country. Members of Wind on the Wires operate plants in Missouri and also have contracts to provide energy to utilities in Missouri. Wind on the Wires is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104. Notice and mailings may be sent to:

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and

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2603 Huntleigh Place
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2. This motion is brought within the deadline to seek intervention established in the Commission's Order Directing Notice, Setting Intervention Deadline issued on September 18, 2017.
3. Wind on the Wires will be directly impacted by the decision to grant or deny Ameren Transmission Company of Illinois ("ATXI") a certificate of convenience and necessity to build, own and operate a 345 kilovolt transmission line from Palmyra, Missouri to the Iowa border and its related substation. If the certificate of need is not granted, Wind on the Wires' members will be materially harmed because they lose the opportunity to advocate for the Mark Twain line which will enable the construction of wind energy facilities in Missouri, Iowa, Illinois and other MISO states that could deliver cost effective renewable energy into Missouri, and other states served by MISO.
4. Wind on the Wires will be supporting the certificate of convenience and necessity sought by ATXI.
5. No other party or entity interested in this proceeding can adequately represent the interests of Wind on the Wires because our interest differs from those of Midcontinent Independent System Operators, Inc. Granting Wind on the Wires'

intervention will advance the interests of justice and will in no way impair the prompt consideration and resolution of this matter by the Commission.

6. Wind on the Wires' intervention will serve the public interest by assisting the development of a full and complete record for the Commission's decision in this case.

Wherefore, Wind on the Wires seeks permission to intervene and provide additional information, which will serve the public interest in the referenced case.

Respectfully submitted,

/s/ Deirdre K. Hirner
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Attorney for Wind on the Wires

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on October 6, 2017.

/s/ Deirdre K. Hirner
Attorney for Wind on the Wires