

**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 Convenience and Necessity)
under Section 393.170 RSMo. relating to) File No. EA-2022-0099
Transmission Investments in Southeast)
Missouri.)

**APPLICATION
AND
MOTION FOR EXPEDITED TREATMENT**

Ameren Transmission Company of Illinois (ATXI), pursuant to section 393.170 RSMo., 20 CSR 4240-2.060, and 20 CSR 4240-20.045, makes this application to the Missouri Public Service Commission (Commission) for a certificate of convenience and necessity (CCN) and related approvals authorizing ATXI to construct, acquire, own, operate and maintain certain transmission facilities in, around, and between the Cities of New Madrid and Sikeston, Missouri (the Project). The requested CCN and related approvals will enable ATXI to participate in a collaborative effort among ATXI, New Madrid, Sikeston (including the Sikeston Board of Municipal Utilities (SBMU)), and the Missouri Joint Municipal Electric Utility Commission (MJMEUC) (together, the Project parties) to simultaneously address the energy needs of New Madrid and Sikeston in a manner that not only benefits all Project parties and the region generally, but also will provide a platform for future benefits to customers in the Midcontinent Independent System Operator, Inc. (MISO) Ameren Missouri (AMMO) Pricing Zone.

I. The Applicant

1. ATXI is a corporation organized under the laws of Illinois with its principal office at 1901 Chouteau Avenue, St. Louis, Missouri 63103. It is a wholly-owned subsidiary of Ameren Corporation (Ameren). ATXI is duly authorized to do business in Missouri. A certified copy of ATXI’s Authority to Conduct Business in the State of Missouri is attached to this Application as

Appendix A.

2. ATXI is what is referred to as a transmission-only utility. It was initially created to help facilitate additional transmission development in Illinois. Today, ATXI generally pursues and develops transmission opportunities that create value for end-use customers, in the region in general, but that might not best fit into the project development portfolios of Ameren's traditional incumbent utility subsidiaries, ATXI's affiliates Union Electric Company d/b/a Ameren Missouri and Ameren Illinois Company d/b/a Ameren Illinois.

3. ATXI was first recognized by the Commission as a public utility in File No. EA-2015-0145. ATXI has a successful track record in developing several Multi-Value Projects and has also recently expanded its project portfolio to include opportunities like the ones ATXI recently developed in conjunction with the City of Rolla (File No. EA-2018-0327) and its collaboration with Citizens Electric Cooperative and Wabash Valley Power Alliance on the Limestone Ridge Project in Perry and Cape Girardeau Counties in Southeast Missouri (File No. EA-2021-0087).

4. In addition to the undersigned counsel, correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to:

Eric Dearmont
Director, Regulatory Affairs & Interconnection Policy
AMEREN SERVICES COMPANY
One Ameren Plaza
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St. Louis, Missouri 63166
(314) 554-3543
EDearmont@ameren.com

5. Other than matters that may be pending before the Federal Energy Regulatory Commission (FERC), ATXI has no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three (3) years that involve

customer service or rates.

6. ATXI has no overdue or unpaid annual reports or assessment fees.

7. An affidavit providing the authorized officer verification required by 20 CSR 4240-2.060(1)(M) is attached as **Appendix B** to this Application.

II. The Project

8. The City of New Madrid has been actively exploring opportunities that would drive economic development to the city and provide the associated benefits to its residents. To attract and effectively pursue such opportunities, New Madrid requires a direct connection to MISO to support their current, native load and to provide a platform for continued economic development and load growth in the future.

9. SBMU seeks to partner with ATXI (and MJMEUC) to construct new transmission facilities to ensure SBMU the flexibility necessary to most economically transmit the energy it generates. Uniquely situated at the seam between the Southwest Power Pool (SPP), MISO and Associated Electric Cooperative, Inc. (AECI) markets, SBMU specifically wants to utilize the system capabilities to support its own requirements while retaining the optionality to cost-effectively serve third-party customers located in the SPP, MISO and/or AECI markets.

10. To address New Madrid's and SBMU's energy needs, the Project parties have collaborated to develop the Project that is the subject of this Application.

11. The Project consists of four transmission facilities components:

a. The Comstock substation. ATXI will construct a new eight-position, 161 kV breaker substation on a parcel owned by Sikeston. This new substation will be owned jointly by ATXI, SBMU and MJMEUC. Once constructed, SBMU will acquire from ATXI discrete assets within the substation as well as 64% of the common substation assets. SBMU will use those assets to continue serving its retail customers' load located outside of MISO, as well as exporting power

to wholesale customers in the SPP, MISO and AECI regions. ATXI and MJMEUC will jointly own the remaining breakers, which MISO will functionally control, as well as the remaining 36% of substation common assets.

b. The Area Connections. To connect the Comstock substation to the existing system, ATXI will need to construct or modify six transmission lines adjacent to the new Comstock substation to connect the new substation to the grid. At the conclusion of the Project, ATXI and MJMEUC will have a cumulative 25% interest in the individual Area Connection that will connect the Existing Line (defined below) with the Comstock substation. SBMU will own and maintain the Area Connections that will connect the Comstock substation with the SWPA substation and with SBMU's other facilities. Ameren Missouri will continue to own the line connections that will be re-terminated into the Comstock substation.

c. The New Line. ATXI will construct an approximately 1.2-mile long single-circuit 161kV transmission line extending east from the existing Southwestern Power Association (SWPA) New Madrid substation to the existing MPL substation just outside of New Madrid. ATXI and MJMEUC will own the New Line. SBMU will operate and maintain the New Line. The New Line will be under MISO's functional control.

d. The Existing Line. SBMU owns an approximately 28-mile, 161 kV transmission line that extends south from SWPA's Sikeston substation and terminates at AECI's existing New Madrid substation. ATXI will acquire a 12.75% undivided interest in the Existing Line. MJMEUC will acquire a 12.25% undivided interest in the Existing Line. In total, ATXI and MJMEUC will acquire a 25% interest in the Existing Line. SBMU will continue to operate and manage the Existing Line.

12. The collaborative effort among the Project parties, and their respective commitments regarding the Project components, are memorialized in a variety of agreements,

three of which ATXI is specifically requesting the Commission's approval: (1) a Joint Ownership Agreement among ATXI, MJMEUC, and Sikeston (including SBMU); (2) a Construction Agreement between ATXI and SBMU; and (3) an Operation and Maintenance Services Agreement among ATXI, MJMEUC, and SBMU) These agreements are attached to the direct testimony of ATXI witness Sean Black (ATXI Exhibit 1.0) as **Confidential Schedules SB-D3, SB-D4, and SB-D5**, respectively. A table depicting the Project parties' various O&M commitments with respect to the assets, which will be appended to the executed O&M Agreement, is attached as **Confidential Schedule SB-D6** to Mr. Black's testimony. There are a variety of other, ancillary agreements among the Project parties necessary to effectuate their collaborative effort. Mr. Black's testimony identifies these agreements and notes the status of each as of this Application filing.

13. This Project will provide New Madrid a direct connection to MISO through transmission facilities to be owned by ATXI and MJMEUC, as members of MISO, to attract new development to New Madrid. It will allow SBMU to own transmission facilities that will give SBMU direct connectivity to SPP, MISO, and AECI. And it will address New Madrid's and Sikeston's municipal energy needs, all in a manner that not only benefits all parties and the region generally, but also will provide a platform for future benefits to customers in the MISO AMMO Pricing Zone.

14. The Project also positions Ameren well for potential future expansions of its existing system, and specifically, of the Existing Line, which could improve system reliability and allow Ameren Missouri to directly serve retail customers located in the Hayti/Portageville region, as well as improve system reliability to all customers in the region. A future expansion would also create an additional contract path between the North and South regions of MISO. That could in turn reduce payments under the Joint Operating Agreement in place between MISO and SPP, benefitting Ameren Missouri retail customers and any other retail or wholesale customers served

by the MISO transmission system.

III. Summary of Direct Testimony

15. The witnesses providing direct testimony in support of ATXI's Application, and the subject matter of their testimony, are:

Witness	ATXI Exhibit No.	Direct Testimony Subject Matter
Sean Black	1.0	Mr. Black is the Director of Transmission Business Development for Ameren Services Company (Ameren Services), the services company affiliate of ATXI. He provides an overview of the Project, including general descriptions of the transmission facilities that ATXI proposes to construct, acquire, and operate; summarizes the Project parties' respective commitments with respect to the Project facilities; generally explains the Project's cost and financing, including the costs of the Project's components that will be allocated to customers within the MISO AMMO Pricing Zone; addresses ATXI's landowner notice efforts; and describes the Project's benefits, particularly in light of the "Tartan Criteria" that the Commission typically considers in assessing CCN requests, including why the Project is necessary and convenient for the public service.
Stephanie Thomson	2.0	Ms. Thomson is a Project Manager for Ameren Services and, specifically, the Project that is the subject of this Application. She explains the construction and operation management process and construction schedule for the Project's three new construction components and identifies the costs of those new facilities and the partial interest that ATXI will acquire in the Existing Line.
Jessica Timmermann	3.0	Ms. Timmermann is a Supervising Engineer in Ameren Services' Transmission Line Design Department. She describes the line-related elements of the Project.
Curtiss Frazier	4.0	Mr. Frazier is a Principal Engineer in Ameren Services' Transmission Substation Department. He explains the new Comstock substation that ATXI will construct as part of the Project.

IV. Filing Requirements under 393.170.1 RSMo. and 20 CSR 4240-20.045(6)

16. ATXI requests a CCN authorizing it to:
- a. construct and install the Comstock substation;

- b. construct and install the Area Connections; and
- c. construct and install the New Line.

These transmission facilities are collectively referred to as the “New Facilities.”

17. In addition to the information provided above, this Application and the associated direct testimony satisfies the filing requirements of 20 CSR 4240-20.045(6) with respect to the New Facilities, as follows.

18. Per 20 CSR 4240-20.045(6)(A), a description of the site of the new Comstock substation is provided in the direct testimony of Mr. Frazier, and a depiction of the site is provided as **Confidential Schedule CF-D1** to that testimony. Descriptions of the sites and routes for the Area Connections and New Line are provided in the direct testimony of Ms. Timmermann, and depictions of the sites and routes are provided as **Schedules JT-D5 and JT-D2**, respectively, to that testimony.

19. Per 20 CSR 4240-20.045(6)(B), list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in Section 319.015, RSMo., that the proposed construction will cross is attached as **Appendix C** to this Application.

20. Per 20 CSR 4240-20.045(6)(C), descriptions of the plans and specifications for the New Facilities, and identification of the operational features of the New Facilities once fully operational and used for service, are collectively provided in the direct testimonies of Ms. Timmermann and Mr. Frazier. The estimated costs for the complete scope of the Project, as well as the portions of the total Project costs to be allocated to ATXI and to the MISO AMMO Pricing Zone, is provided in the direct testimony of Ms. Thomson.

21. Per 20 CSR 4240-20.045(6)(D), the Project schedule, including the projected beginning of construction date and the anticipated fully operational and used for service date of

the New Facilities, is provided in the direct testimony of Ms. Thomson.

22. Per 20 CSR 4240-20.045(6)(E), the only common plant to be included in the Project is certain communication equipment within the new Comstock substation, which will be used for processing electric data for multiple Ameren subsidiaries.

23. Per 20 CSR 4240-20.045(6)(F), ATXI's plans for financing the New Facilities are explained in the direct testimony of Mr. Black.

24. ATXI is not subject to 20 CSR 4240-22, as it is not an electric utility that sold more than one (1) million megawatt-hours to Missouri retail electric customers in calendar year 2009. Accordingly, the 20 CSR 4240-20.045(6)(G) requirement to describe how the Project relates to the utility's adopted preferred plan is not applicable to ATXI.

25. Per 20 CSR 4240-20.045(6)(H), an overview of ATXI's plan regarding competitive bidding for the design, engineering, procurement, construction management, and construction of the New Facilities is provided in the direct testimony of Ms. Thomson.

26. Per 20 CSR 4240-20.045(6)(I), an overview of ATXI's plans for operating and maintaining the New Facilities is provided in the direct testimony of Ms. Thomson.

27. Per 20 CSR 4240-20.045(6)(J), an overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of the New Facilities is provided in the direct testimony of Ms. Thomson.

28. An affidavit certifying compliance with the notice requirements to landowners directly affected by the routes and locations of the New Facilities, as applicable, in 20 CSR 4240-20.045(6)(K) is attached as **Appendix D** to this Application. The affidavit includes a list of all directly affected landowners to whom notice was sent.¹

¹ ATXI is filing confidential and public versions of Appendix D. The confidential version contains the names and addresses of landowners and is confidential pursuant to 20 CSR 4240-2.135(2)(A)(1).

29. ATXI has not yet determined what assets, permits or other authorizations may be required from any affected governmental bodies in order to commence construction of the New Facilities. If any are required, ATXI will provide them when they are available, consistent with Missouri law, as permitted under 20 CSR 4240-20.045(3)(C).

V. Filing Requirements under 393.170.2 RSMo. and 20 CSR 4240-20.045(5)

30. As explained, the Existing Line in which ATXI will acquire an interest will continue to be operated and maintained by SBMU. Nevertheless, ATXI requests a CCN authorizing ATXI operate the Existing Line, to the extent such authorization is required.

31. Per 20 CSR 4240-20.045(5)(A), a description of the Existing Line is provided in the direct testimony of Ms. Timmermann.

32. Per 20 CSR 4240-20.045(5)(B), Mr. Black explains the value of ATXI's interest in the Existing Line.

33. Per 20 CSR 4240-20.045(5)(C), Mr. Black explains the purchase price for that interest and ATXI's plans for financing the acquisition and operation of the interest, which are the same as for the New Facilities.

34. Per 20 CSR 4240-20.045(5) (D), the plans and specifications for the Existing Line are provided in the direct testimony of Ms. Timmermann and a depiction of the Existing Line is attached as **Schedule JT-D1** to that testimony.

VI. Project Benefits – The Tartan Factors

35. The “Tartan Factors,” which are typically relied on by the Commission in evaluating CCN requests, support issuance of the CCN that ATXI requests, as follows.

36. There is need for the service ATXI proposes to provide through the Project.

37. This Project will provide New Madrid a direct connection to MISO through transmission facilities to be owned by ATXI and MJMEUC, as members of MISO, to attract new

development to New Madrid. It will allow SBMU to own transmission facilities that will give SBMU direct connectivity to SPP, MISO, and AECI. And it will address New Madrid's and Sikeston's municipal energy needs, all in a manner that not only benefits all parties and the region generally, but also will provide a platform for future benefits to customers in the MISO AMMO Pricing Zone.

38. The Project also positions Ameren well for potential future expansions of its existing system, and specifically, of the Existing Line, which could improve system reliability and allow Ameren Missouri to directly serve retail customers located in the Hayti/Portageville region, as well as improve system reliability to all customers in the region. A future expansion would also create an additional contract path between the North and South regions of MISO. That could in turn reduce payments under the Joint Operating Agreement in place between MISO and SPP, benefitting Ameren Missouri retail customers and any other retail or wholesale customers served by the MISO transmission system

39. The reliability and economic benefits that the Project will provide are explained in the direct testimony of Mr. Black.

40. The construction of the New Facilities is economically feasible, as Mr. Black explains. Specifically, the Project (based on New Madrid's current, native load) will generate transmission service revenues that produce net benefits to customers in the AMMO Pricing Zone over 20 years. Future load growth, should it materialize, is expected to create a further net positive financial benefit for customers in the AMMO Pricing Zone (i.e., it could generate more revenues than costs).

41. ATXI has the financial capability to construct the New Facilities, as Mr. Black also explains.

42. ATXI is qualified to construct and operate the Project. As further explained by Mr.

Black, ATXI has already developed and today reliably, safely, and efficiently owns and operates hundreds of miles of 161 kV and 345 kV electric transmission line and numerous breaker stations. This experience qualifies ATXI to construct, install, own, operate, maintain, and control the Project.

43. The Project will promote the public interest for the reasons explained in this application and the accompanying testimony. Notably, when, like here, the first four of the Tartan Factors are satisfied, the Commission's practice is to generally conclude, without more, that the last factor—the public interest—is also served by granting the CCN.

VII. Other Matters

44. On October 1, 2021, ATXI filed a 60-day notice of this Application as required by 20 CSR 4240-4.017.

45. Because ATXI will not provide retail service to end-use customers and will not be rate-regulated by the Commission, the Commission has waived the rate schedule filing requirements of 20 CSR 4240-20.105, the annual reporting requirement of 20 CSR 4240-10.145, the depreciation study requirement of 20 CSR 4240-3.175, and the reporting requirements of 20 CSR 4240-3.190, for good cause. ATXI will continue to file with the Commission the annual report it files with FERC.

VIII. Conditional Request

46. 20 CSR 4240-20.045(3)(C) provides that “If any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.”

47. As explained in Mr. Black's testimony, the JOA, Construction Agreement, and

O&M Agreement have not yet been executed by the Project parties, although the parties have reached agreement in principle and the agreements' execution is imminent. Thus, ATXI does not anticipate any material changes to any agreement from the versions provided with Mr. Black's testimony. And ATXI will provide the Commission and its Staff with the final versions of the agreements (and any ancillary agreements in which the Commission or its Staff is interested), once executed. To the extent that any particular agreement that ATXI requests specific approval of or that the Commission or its Staff seeks to review is not finalized and executed before the Commission should, in its discretion, grant a CCN in this proceeding, however, ATXI requests that the Commission grant the CCN conditioned upon ATXI providing the final executed copy of that agreement. To be clear, ATXI anticipates being able to provide executed copies of the three main agreements – the JOA, Construction Agreement, and O&M Agreement – during the pendency of the case.

48. ATXI recognizes that its request for a CCN before all of the agreements have been executed is not typical. While ATXI had intended for all agreements to be final before filing its application, the complexity of the transaction coupled with the timing of the municipalities' needs made such an approach impracticable. Accordingly, ATXI is requesting a CCN for this Project at this junction so as not to delay construction and the resulting benefits of the Project to New Madrid and SBMU.

IX. Motion for Expedited Treatment

49. ATXI requests that the Commission grant this Application as soon as reasonably practical, but in any event no later than May 2, 2022.

50. As discussed above, the proposed Project is necessary to meet the energy needs of Sikeston and New Madrid. To meet these needs, the Project is on a very aggressive schedule—construction needs to commence by June 2023. While, the Project parties have been in discussions

for several years to develop a project to meet those needs and unlock the benefits described above and in Mr. Black's direct testimony, as a result of complications due to the COVID-19 pandemic, a significant load addition that was expected to be added behind-the-meter at New Madrid, has not yet materialized as originally anticipated. The Project parties nevertheless worked hard to amend the Project scope and keep the Project on track. Some of the Project parties will start to experience significant monetary damages if the Project in-service date extends past the June 2023 target.

51. Further, while ATXI appreciates that this is an aggressive schedule, and that ATXI is requesting a CCN in an expedited fashion – a request ATXI takes very seriously – this Project is unique given the limited number of landowners it will affect and the status of negotiations with those individuals. Again, the new construction associated with the Project is limited to two areas: the corridor of the New Line and the area at and around the new Comstock substation, including the Area Connections there. With respect to the work at and around the new Comstock substation, with the exception of a few spans of line along one of the Area Connections, the real estate interest for which Sikeston has already acquired, all of the work at and around the substation will be on property owned by Sikeston or SWPA. ATXI intends to acquire an easement or license from those parties to facilitate construction. With respect to the New Line, those facilities affect only four unique landowners, who own a total of seven distinct parcels. ATXI has already obtained voluntary options from each of those landowners. ATXI will exercise these options and convert them into easements in a manner consistent with the Project construction schedule. In other words, ATXI is essentially extending the MISO border some 20 miles south, but only directly affecting four to five disinterested landowners, the majority of whom have already conveyed or committed to convey the land rights needed to construct the Project.

52. In light of its request for expedited treatment of this Application, ATXI commits to expedited discovery response periods, to facilitate Commission Staff's review and investigation of

the Application.

WHEREFORE, ATXI respectfully requests that the Commission (1) grant ATXI a Certificate of Convenience and Necessity pursuant to § 393.170.1 authorizing ATXI to:

- a. construct and install the Comstock substation;
- b. construct and install the Area Connections; and
- c. construct and install the single-circuit 161kV New Line;

(2) grant ATXI a Certificate of Convenience and Necessity pursuant to § 393.170.2 authorizing ATXI to operate the Existing Line, to the extent required; (3) approve the Joint Operating Agreement, Construction Agreement, and Operation and Maintenance Agreement among the Project parties; (4) grant ATXI's motion for expedited treatment of this Application; and (5) grant such other and further relief as the Commission deems just and reasonable.

Respectfully submitted,

AMEREN TRANSMISSION COMPANY OF ILLINOIS

By: /s/ Geoffrey F. Grammer

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Geoffrey F. Grammer, Esq.
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the following via electronic mail (e-mail) on this 21st of December 2021.

Office of Staff Counsel
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staffcounsel@psc.mo.gov

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/s/ Geoffrey F. Grammer

Geoffrey F. Grammer, Counsel for
Ameren Transmission Company of Illinois

Appendix A

STATE OF MISSOURI



John R. Ashcroft
Secretary of State

CERTIFICATE OF GOOD STANDING

I, John R. Ashcroft, Secretary of State of the STATE OF MISSOURI, do hereby certify that the records in my office and in my care and custody reveal that

AMEREN TRANSMISSION COMPANY OF ILLINOIS

F01245931

A Illinois entity was created under the laws of this State on 8/1/2012, and in Good Standing, having fully complied with all the requirements of this office.

IN TESTIMONY WHEREOF, I hereunto set my hand and cause to be affixed the GREAT SEAL of the State of Missouri.
Done at the City of Jefferson, the 23rd day of April, 2021.


Secretary of State

Certification Number: CERT-IN78393



Appendix B


**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 under Section 393.170,)
RSMo relating to Transmission Investments)
in Southeast Missouri.)

Case No. EA-2022-0099

AFFIDAVIT

1. My name is Shawn E. Schukar. I am Chairman and President of Ameren Transmission Company of Illinois, the Applicant in the above-captioned proceeding.
2. I have read the above and foregoing Application and the statements contained therein are true and correct to the best of my information, knowledge, and belief.
3. I am authorized to make this statement on behalf of Ameren Transmission Company of Illinois.
4. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.



Shawn E. Schukar
Chairman and President
Ameren Transmission Company of Illinois

December 17, 2021

Date

Appendix C

New Line

<u>Company</u>	<u>Type</u>	<u>Contact</u>
M&A Electric Power Coop	Electric	573-785-9651
SEMO Electric Coop	Electric	800-813-5230
Ozark Border Electric Coop	Electric	573-785-4631
Liberty Utilities	Gas	855-644-8134
Union Pacific	Rail	888-877-7267

Overhead Electric Crossings

<u>Latitude</u>	<u>Longitude</u>
36°35'11.23"N	89°34'5.65"W
36°34'52.13"N	89°34'8.28"W

Underground Electric Crossings

<u>Latitude</u>	<u>Longitude</u>
36°35'16.25"N	89°33'53.60"W

Railroad Crossings

<u>Latitude</u>	<u>Longitude</u>
36°35'10.45"N	89°34'5.42"W

Underground Gas Line Crossings

<u>Latitude</u>	<u>Longitude</u>
36°35'13.06"N	89°34'5.11"W

Substation/Area Connections

<u>Company</u>	<u>Type</u>	<u>Contact</u>
ATT Transmission	Comms	800-252-1133
ATT Distribution	Comms	314-275-0020
City of Sikeston Street Dept	Storm, Drainage	573-475-3732
SEMO Electric Coop	Electric	573-471-5821
Sikeston Municipal Utilities	Electric, Sewer, Water	573-471-3328
Richland Drainage District	Drainage	573-471-6688

Overhead Electric Crossings

<u>Latitude</u>	<u>Longitude</u>
36°52'35.05"N	89°37'36.21"W
36°52'33.49"N	89°37'36.18"W
36°52'32.97"N	89°37'36.20"W
36°52'44.29"N	89°37'24.98"W
36°52'37.83"N	89°37'28.44"W

Underground Electric Crossings

<u>Latitude</u>	<u>Longitude</u>
36°52'45.85"N	89°37'29.22"W

36°52'44.08"N	89°37'29.13"W
36°52'42.85"N	89°37'29.07"W
36°52'42.57"N	89°37'29.03"W
36°52'41.35"N	89°37'28.97"W
36°52'37.90"N	89°37'28.49"W
36°52'37.92"N	89°37'28.18"W

Underground Communications Crossings

<u>Latitude</u>	<u>Longitude</u>
36°52'32.86"N	89°37'36.21"W

Underground Waterline Crossings

<u>Latitude</u>	<u>Longitude</u>
36°52'43.20"N	89°37'27.14"W

Underground Sewer, Drainage

<u>Latitude</u>	<u>Longitude</u>
36°52'33.09"N	89°37'35.99"W
36°52'43.75"N	89°37'26.28"W
36°52'43.38"N	89°37'26.32"W

Appendix D

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RSMo relating to Transmission Investments)
in Southeast Missouri.)

Case No. EA-2022-0099

AFFIDAVIT

1. My name is Eric Dearthmont. I am the Director of Regulatory Affairs & Interconnection Policy for Ameren Services Company, which is a subsidiary of Ameren Corporation and an affiliate of Ameren Transmission Company of Illinois (ATXI), the Applicant in the above-captioned matter.

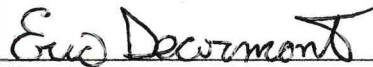
2. At the time of filing its application in this proceeding, ATXI is providing notice of its application to all owners of land, or their designee, as stated in the records of the county assessor's office no more than sixty (60) days prior to the date the notice was sent, who would be directly affected by ATXI's requested certificate, as required by 20 CSR 4240-20.045(6)(K)(1) and (2).

3. A true and accurate copy of ATXI's form notice letter is attached and is included as an exhibit to the Direct Testimony of ATXI witness Mr. Sean Black (ATXI Exhibit 1.0) in this proceeding.

4. A CONFIDENTIAL list of all directly affected landowners, as that term is defined by 20 CSR 4240-20.045(6)(K)(1), to whom ATXI sent the above referenced notice is also attached.

5. I am authorized to make this statement on behalf of ATXI.

6. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.



Eric Dearthmont
Director – Regulatory Affairs & Interconnection Policy
Ameren Services Company

12-17-21

Date

**The Attachment to the Affidavit of Eric Dearmont contains
customer-specific information and is Confidential in its entirety**

20 CSR 4240-2.135(2)(A)(1)