

**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.)

NEIGHBORS UNITED’S MOTION TO STAY EVIDENTIARY HEARING

COMES NOW Neighbors United Against Ameren’s Power Line (Neighbors United), by and through the undersigned counsel, and for its Motion respectfully states as follows:

1. On January 5, 2016, the undersigned submitted a Sunshine request to the Missouri Public Service Commission for records relevant to the above stated case. The Sunshine request is attached hereto.

2. On the same day, the Commission’s Secretary replied to the Sunshine request by email stating “I will provide you with either a final response, or an update on the progress of our search, by 1/20/2016.” The Commission’s response is also attached hereto. At the time of this filing (10:15 p.m., 1/20/2016), the Commission has not provided the undersigned with a final response or an update on the progress of the search.

3. The Sunshine request was filed on the undersigned’s good faith belief that the Commission’s records contain documents that will materially affect the outcome of this case, including but not limited to, information regarding the necessity of wind resources in Missouri to meet future state and federal requirements.

4. Neighbors United requests the evidentiary hearing in this case be stayed until the relevant records, or a privilege log as to why the Commission is withholding the records, is provided to the undersigned. The Commission's next scheduled agenda session is January 27, 2016.

WHEREFORE, Neighbors United files this Motion to Stay the Evidentiary Hearing in this matter until the Sunshine request is responded to pursuant to Missouri Sunshine Law, Chapter 610.

Respectfully submitted,

HERNANDEZ LAW FIRM, LLC

By: **/s/ Jennifer Hernandez**
Jennifer Hernandez, MO Bar No. 59814
1802 Sun Valley Drive
Jefferson City, Missouri 65109
Phone: 573-616-1486
Fax: 573-342-4962
E-Mail: jennifer@hernandezlegal.com

ATTORNEY FOR NEIGHBORS
UNITED AGAINST AMEREN'S POWER
LINE

Certificate of Service

I certify that a true copy of the above and foregoing was served to all counsel of record by electronic mail this 20th day of January 2016.

/s/ Jennifer Hernandez
Jennifer Hernandez

Arturo A. Hernandez III, J.D.
Licensed in:
Missouri
Federal Western District of Missouri
Certified Guardian ad Litem, Missouri



Jennifer L. Hernandez, J.D., M.S.E.L.
(Of Counsel)
Licensed in: Missouri
Certified Guardian ad Litem, Missouri

HERNANDEZ LAW FIRM
LLC
ATTORNEYS AND COUNSELORS AT LAW

January 5, 2016
Sent via email

Secretary of the Missouri Public Service Commission
Attention: Data Center
P.O. Box 360
Jefferson City, MO 65102
recordsrequest@psc.mo.gov

Re: Sunshine Records Request

Dear Secretary Woodruff:

This is a request for records under the Missouri Sunshine Law, Chapter 610, Revised Statutes of Missouri. I request that you make available to me: all records that relate to:

- 1) Any and all records that relate to the Mark Twain Transmission Project. This request includes, but should not be limited to, correspondence of Commissioners on the Board of the Organization of MISO States, Commission employees (such as Adam McKinnie and Walter Cecil), correspondence with other OMS members, or correspondence with MISO itself regarding the Mark Twain Transmission Project specifically or the Multi Value Portfolio it is included in; and
- 2) Any and all records that relate to the Midcontinent States Environmental and Energy Regulators (MSEER) Group including, but not limited to, documents regarding the modeling of Missouri compliance with the Clean Power Plan.

Please include in the search all records for Commission employees or Commission Staff employees assigned to special Commission projects, such as Claire Eubanks on the MSEER project.

I request that the records responsive to my request be copied and sent to me at the following address: Hernandez Law Firm, LLC, Attn: Jennifer Hernandez, 1802 Sun Valley Drive, Jefferson City, MO 65109.

Please let me know in advance of any search or copying if the fees will exceed \$200.00. If you have any questions regarding this request please let me know.

Respectfully,



Jennifer Hernandez
Hernandez Law Firm, LLC



MISSOURI PUBLIC SERVICE COMMISSION

RECORDS REQUEST FORM

REQUESTOR'S INFORMATION	
REQUESTOR'S NAME: Jennifer Hernandez on behalf of Neighbors United Against Ameren's Power Line	
COMPANY NAME: Hernandez Law Firm, LLC	
MAILING ADDRESS: (MUST PROVIDE STREET ADDRESS IF REQUESTING PRIORITY OR OVERNIGHT DELIVERY) 1802 Sun Valley Drive	
CITY/STATE/ZIP: Jefferson City, MO 65109	
PHONE: 573-616-1486	FAX: 573-342-4962
EMAIL: jennifer@hernandezlegal.com	
BILLING INFORMATION <input checked="" type="checkbox"/> CHECK HERE IF SAME AS ABOVE	
BILLING CONTACT NAME:	
COMPANY NAME:	
BILLING ADDRESS:	
CITY/STATE/ZIP:	
PHONE:	FAX:
EMAIL:	
DOCUMENT & DELIVERY INFORMATION	
DESCRIPTION OF DOCUMENT(S) BEING REQUESTED: (ATTACH ADDITIONAL SHEETS IF NECESSARY) Please see Records Request Form attached	
CASE NUMBER OR TRACKING NUMBER:	
DOCUMENT FORMAT: <input type="checkbox"/> PAPER <input type="checkbox"/> ELECTRONIC (AVAILABILITY VARIES BY DOCUMENT TYPE AND YEAR)	
CERTIFIED COPY: <input type="checkbox"/> YES <input type="checkbox"/> NO	
PREFERRED DELIVERY METHOD:	
<input type="checkbox"/> REGULAR MAIL <input type="checkbox"/> EMAIL <input type="checkbox"/> FAX <input type="checkbox"/> PICK-UP <input type="checkbox"/> PRIORITY/OVERNIGHT MAIL*	
*RECIPIENT WILL BE BILLED FOR PRIORITY OR OVERNIGHT DELIVERY. PLEASE PROVIDE THE FOLLOWING. ACCOUNT NUMBER:	
ACCOUNT TYPE: <input type="checkbox"/> UPS <input type="checkbox"/> FEDEX <input type="checkbox"/> OTHER (SPECIFY) _____	
SEND REQUESTS TO: MISSOURI PUBLIC SERVICE COMMISSION DATA CENTER P.O. Box 360 JEFFERSON CITY, MO 65101 FAX: 573-522-6176 EMAIL: RECORDSREQUEST@PSC.MO.GOV	CHARGES: AN ACTUAL-COST FEE FORMULA IS APPLIED FOR COPIES. CHARGES WILL NOT EXCEED 10 CENTS PER PAGE. FOR CERTIFIED COPIES, AN ADDITIONAL \$1 PER CERTIFIED SHEET WILL BE APPLIED. AN INVOICE FOR FEES WILL BE ISSUED TO THE BILLING CONTACT LISTED ABOVE.
QUESTIONS: PLEASE CALL THE DATA CENTER AT 573-751-7496	



Commissioners

DANIEL Y. HALL
Chairman

STEPHEN M. STOLL

WILLIAM P. KENNEY

SCOTT T. RUPP

MAIDA J. COLEMAN

Missouri Public Service Commission

POST OFFICE BOX 360
JEFFERSON CITY, MISSOURI 65102
573-751-3234
573-751-1847 (Fax Number)
<http://www.psc.mo.gov>

SHELLEY BRUEGGEMANN
General Counsel

MORRIS WOODRUFF
Secretary

WESS A. HENDERSON
Director of Administration

NATELLE DIETRICH
Staff Director

January 5, 2016

VIA E-MAIL: jennifer@hernandezlegal.com

Jennifer Hernandez
Hernandez Law Firm, LLC
1802 Sun Valley Drive
Jefferson City, MO 65109

Re: Sunshine Request of 1/5/2016

Dear Jennifer Hernandez:

The Commission has received your request under Missouri's Sunshine Law for:

Any and all records that relate to the Mark Twain Transmission Project and the Midcontinent States Environmental and Energy Regulators

The Commission will search our records to determine whether we have the information that you have requested. Once we have completed our search, we will examine what we find to determine what information we may disclose to you.

Missouri's Sunshine Law, specifically Section 610.026, RSMo (Cum. Supp. 2013), allows a state agency to charge a fee for copying costs and research time required to fulfill records requests. If our preliminary search of our records reveals that such a fee will be required, I will contact you to determine how you wish to proceed before you incur any such fees.

I will provide you with either a final response, or an update on the progress of our search, by 1/20/2016. Please let me know if you have any questions. You can reach me by e-mail at morris.woodruff@psc.mo.gov, or by phone at 573-751-2849.

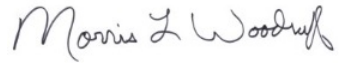
Jennifer Hernandez

January 5, 2016

Page 2

Please contact me with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Morris L. Woodruff".

Morris L. Woodruff

Secretary of the Commission