

**BEFORE THE PUBLIC SERVICE COMMISSION
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) No. EA-2017-0345
Convenience and Necessity Authorizing it to)
Construct, Install, Own, Operate, Maintain and)
Otherwise Control and Manage a 345,000-volt)
Electric Transmission Line in from Palmyra,)
Missouri to the Iowa Border and Associated)
Substation near Kirksville, Missouri.)

**MOTION OF MIDCONTINENT INDEPENDENT SYSTEM OPERATOR, INC.
TO SUBMIT DIRECT TESTIMONY IN SUPPORT OF
THE APPLICATION AND ATTACHED
DIRECT TESTIMONY OF JAMESON T. SMITH**

The Midcontinent Independent System Operator, Inc. (“MISO”) filed its Application to Intervene, stating (in part) the following:

1. MISO is a not-for-profit corporation organized and existing under and by virtue of the laws of Delaware, with its principal place of business at 720 City Center Drive, Carmel, Indiana 46032.

2. MISO is a regional transmission organization (“RTO”) that monitors and controls the bulk electric system for its transmission owner members and system users, and provides all customers with open access transmission service. The Federal Energy Regulatory Commission (“FERC”) approved MISO as the nation’s first RTO on December 20, 2001. On February 1, 2002 MISO began providing regional transmission service for the movement of bulk power over the transmission facilities within its footprint. MISO has operated real-time and day-ahead energy markets since April 2005, and an ancillary services market since January 2009.

3. As a functioning RTO, MISO is the sole provider of transmission service for those entities such as Union Electric Company, d/b/a/ Ameren Missouri, that have transferred functional control of their transmission assets to MISO. As the transmission service provider,

MISO has a responsibility for the planning and operation of the regional transmission grid, including the development of projects like the Mark Twain Project proposed in the Application filed in this proceeding by Ameren Transmission Company of Illinois (“ATXI”). The Mark Twain Project is one of the projects approved by MISO as part of its regional portfolio of Multi Value Projects that are intended to upgrade and enhance the regional transmission system.

4. Based on the foregoing, MISO has an interest in the Application and in this proceeding that is different from that of the general public and from the other parties to this matter. MISO’s participation in this docket will bring forth information about attributes of the project under consideration that will assist the Commission in its decision-making. MISO supports completion of projects in the Multi Value Project portfolio, which includes the Mark Twain Project that is the subject of the Application.

Additionally, in support of this Motion to Submit Direct Testimony in Support of the Application, MISO states the following:

5. This Commission received an earlier application from ATXI, resulting in a Report and Order in File No. EA-2015-0146, issued on April 27, 2016.

6. MISO’s support for the application in the instant case is based upon a project description having essentially the same electrically characteristics as the project that was the subject of File No. EA-2015-0146 (*i.e.* the line route has been adjusted, but electric service is essentially unaltered).

7. The Report and Order in File No. EA-2015-0146 discusses MISO (rebuttal and sur-rebuttal) testimony in the earlier case in some detail, especially in the “Need” portion that begins at paragraph 9 of the Report and Order.

8. Considering the foregoing, the Commission should have important information in the form of direct testimony from a MISO-sponsored witness, even though MISO is not the

applicant in the case. The Commission staff, the Office of the Public Counsel, and other interested parties will also be served by having early access to the information provided in the MISO testimony in order to assist in the preparation of their positions.

9. Accordingly, and pursuant to 4 CSR 240-2.015, there is good cause for the Commission to waive 4 CSR 240-2.130(7) to the extent necessary to permit MISO to present direct testimony, which will promote administrative efficiency and expedite these proceedings.

WHEREFORE, THE RELIEF SOUGHT by MISO, for good cause shown, is permission from the Commission to submit the attached Direct Testimony of Jameson T. Smith as direct testimony in the above referenced case.

Respectfully submitted,

/s/ Karl Zobrist

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 28th day of July 2017 to the persons on the Commission's service list in this case.

/s/ Karl Zobrist _____
Attorney for Midcontinent Independent System
Operator, Inc.