

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

In the Matter of the Application of Union)
Electric Company d/b/a Ameren Missouri)
For Permission to Transfer an Interest in) **File No. EM-2022-0292**
Transmission Assets under 393.190.1)

**STAFF’S SUGGESTION TO JOIN CITY OF HANNIBAL,
ASSOCIATED ELECTRIC COOPERATIVE, INC.,
AND AMEREN ILLINOIS COMPANY AS PARTIES**

COMES NOW the Staff of the Missouri Public Service Commission, by and through counsel, and requests the Missouri Public Service Commission (“Commission”) add the City of Hannibal (“Hannibal”), Associated Electric Cooperative, Inc. (“AECI”), and Ameren Illinois Company (“AIC”) as necessary parties to this case. For its Motion, Staff respectfully states as follows:

1. On April 19, 2022, Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) filed an application requesting Commission approval to transfer an undivided 49% interest in certain transmission facilities in, around, and near the City of Hannibal, Missouri. Ameren Missouri seeks to transfer these facilities to the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”). According to Ameren Missouri’s verified application, the requested transfer will enable Ameren Missouri to replace aged infrastructure and improve reliability in the Hannibal area and Northeast Missouri at a lower cost, which allows the use of a collaborative effort and cost sharing arrangement among Ameren Missouri, MJMEUC, and the City of Hannibal Municipal Utility.¹

¹ EM-2022-0292, EFIS Item No. 1, *Application of Union Electric Company d/b/a Ameren Missouri For Permission to Transfer an Interest in Transmission Assets*, pg. 1.

2. The Commission ordered that any application to intervene in this matter shall be filed no later than May 20, 2022; however, there has been only one application to intervene as of this date. MJMEUC filed its motion to intervene on May 19, 2022.

3. There are four transmission components to be constructed by Ameren Missouri, including the Finn Substation that will interconnect with the Hannibal system and the Associated Electric Cooperative, Inc. (“AECI”) system in northeast Missouri.² The Hannibal system is currently fed by the Marion Substation; however, with this project component, Hannibal’s connection will be relocated to the Finn Substation.³

4. The second component of the project is the reconstruction of 11.7 miles of Ameren Missouri’s existing Peno Creek-Spalding-2 transmission line from AECI’s Spalding Substation to the Finn Substation and from the Finn Substation to the Marion Substation; wherein, an ownership interest in the Spalding to Finn circuit will be transferred to MJMEUC (from AECI’s Spalding Substation to the Finn Substation).⁴

5. The third component is the construction of approximately 0.7 mile of a double circuit line interconnecting to Finn. One circuit, Finn-Oakwood, will be owned and operated (and paid for) by Hannibal and the other circuit will be owned and operated by Ameren Missouri with incremental costs being borne by Hannibal.⁵

6. The fourth component involves the installation of a new bus and circuit breaker at the Marion Substation; whereas, the substation will now have two sources of networked supply from the east via the Ameren Illinois Company (“AIC”) and from the west via the Spalding line. This will create a new Missouri-Illinois networked transmission

² *Id.*, at ¶7.

³ *Id.*

⁴ *Id.*, at ¶8.

⁵ *Id.*, at ¶9.

path, providing an additional source of supply from AIC's system to Finn and Ameren Missouri's system in northeast Missouri generally.⁶

7. Ameren Missouri's application identifies interconnecting with various systems owned or operated by others (Hannibal, AECl, MJMEUC, and AIC) and costs being borne by other systems (Hannibal and MJMEUC), making these entities necessary parties to this matter. In addition, during Staff's investigation/review of Ameren Missouri's application, it may become necessary for Staff to conduct discovery of these entities and to submit data requests to them; pursuant to the Commission's rule governing discovery, data requests may only be submitted to parties.

8. By adding these parties and opening up the possibility of data requests, Staff will be able to avoid the need to use more burdensome subpoena and subpoena *duces tecum* procedures to obtain information from non-parties.

WHEREFORE, Staff submits this Staff Recommendation for the Commission's information and consideration, and recommends that the Commission add City of Hannibal, Associated Electric Cooperative, Inc., and Ameren Illinois Company as necessary parties to this case.

Respectfully submitted,

/s/ J. Scott Stacey

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⁶ Id., at ¶10.

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been transmitted by electronic mail to counsel of record for Ameren Missouri on this 23rd day of May, 2022.

/s/ J. Scott Stacey