

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 a                             )  
Certificate of Convenience and Necessity             ) Case No.EA-2025-0028  
Authorization to Construct, Own, Operate,             )  
Control, Manage, and Maintain a New Substation     )  
And reconfigure an existing transmission             )  
Substation in Cooper County.                             )

**Motion To Intervene  
On Behalf Of Janice Payne, Gary Estes,  
Lynn Calicott, Blair Gardner**

Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner file this Motion to Intervene pursuant to Commission Rule 20 CSR 4240-2.75. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardiner state the following in support of their Motion:

1. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner are owners of Primary Residential properties as well as other structures located in Saline Township, Cooper County, Missouri. Union Electric Company d/b/a Ameren Missouri Cooper Substation and Transmission Line would pass within 300 feet of habitable structures located on our residential Properties.

2. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner ask that communications , orders, and decisions be sent to:

Janice Payne  
16597 V Hwy  
Wooldridge, MO 65287  
Cell: 660-466-0120 or 660-537-3275  
E-mail: [tandjpayne@gmail.com](mailto:tandjpayne@gmail.com)

3. The Commission issued an Order on October 18, 2024, directing Interested parties to intervene by November 5, 2024. This Motion was timely filed on November 04, 2024.
4. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner oppose Union Electric Company d/b/a Ameren Missouri's Application and Reserve the right to provide more detailed objections and rebuttal evidence To Union Electric Company d/b/a Ameren Missouri's proposals, evidence, and Testimony in this case.
5. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner oppose Union Electric Company d/b/a Ameren Missouri proposed New Substation and reconfiguration of an existing transmission Substation in Cooper County For the following reasons:
  - A. The New Substation and reconfiguration of an existing transmission Line will affect three primary residential properties that have been Occupied twenty plus years. There are two additional lots for future Residential properties. There are also three new subdivisions that have been developed in the last three years within a mile.
  - B. The New Substation and reconfiguration of an existing transmission Line will be within 300 feet of habited buildings.
  - C. The New Substation and reconfiguration of an existing transmission Line will decrease the value of the properties.

- D. Potential health risk to Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner and their families from exposure to the high voltage transmission lines, continuous light, and noise.
  - E. Potential interference with radio, satellite, cell, internet, and GPS services.
  - F. The potential unknown affect to local wildlife enjoyed by residents.
  - G. The New Substation and reconfiguration of an existing transmission Line will create an undesirable scenery that residents would be forced to view instead of a natural scenery.
  - H. Union Electric Company d/b/a Ameren Missouri owns 60.51 acres Located in the vicinity of the proposed location of the New Substation and reconfiguration of an existing transmission line. There are areas away from residential property that could be used to expand their new Substation and reconfiguration of an existing transmission Line. Union Electric Company d/b/a Ameren Missouri does not service our properties.
6. Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner have Interest that are different from the general public and those interest Would be adversely affected if Union Electric Company d/b/a Ameren Missouri's application is approved by the Commission.

Therefore, Janice Payne, Gary Estes, Lynn Calicott and Blair Gardner respectfully ask the Commission to grant their Motion to Intervene and allow us to participate in this case.

Respectfully submitted,  
Janice Payne, Gary Estes,  
Lynn Calicott and Blair Gardner  
16597 V Hwy  
Wooldridge, MO 65287  
Cell: 660-466-0120 or 660-537-3275  
E-mail: [tandjpayne@gmail.com](mailto:tandjpayne@gmail.com)

## Certificate of Service

I certify that true and accurate copies of this Motion were sent by e-mail or mail on November 04, 2024, to all parties on the official service list for this case.

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Janice Payne

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Gary Estes

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Lynn Calicott

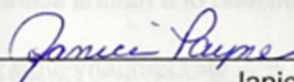
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Blair Gardner

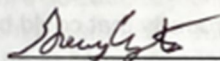
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## Certificate of Service

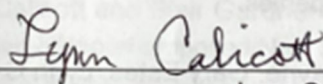
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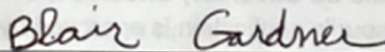
Janice Payne



Gary Estes



Lynn Calicott



Blair Gardner