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Witness:	Shawn E. Schukar
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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2025-0087

DIRECT TESTIMONY

OF

SHAWN E. SCHUKAR

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

St. Louis, Missouri
December, 2024

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DIRECT TESTIMONY

OF

SHAWN E. SCHUKAR

FILE NO. EA-2025-0087

I. INTRODUCTION AND BACKGROUND

Q. Please state your name and business address.

A. My name is Shawn E. Schukar. My business address is 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. By whom are you employed and in what capacity?

A. I am Chairman and President of Ameren Transmission Company of Illinois (ATXI). I am also Senior Vice President, Transmission for Ameren Services Company (Ameren Services). Ameren Services provides professional services to Ameren Corporation's (Ameren) transmission-owning subsidiaries, including ATXI.

Q. Please describe ATXI.

A. ATXI is dedicated to electric transmission infrastructure investment. Today, ATXI owns and operates approximately 560 miles of high voltage electric transmission lines and related facilities in Illinois and Missouri for the purpose of reliably and economically moving electricity across the grid for public consumption. ATXI is a wholly owned subsidiary of Ameren. It is also a transmission-owning member of the Midcontinent Independent System Operator, Inc. (MISO), a member-based, not-for-profit Regional Transmission Organization (RTO) that manages the electric transmission grid within a region that includes portions of Missouri. As relevant to projects in Missouri, ATXI's transmission business is regulated in a comprehensive and complimentary

manner by both the Missouri Public Service Commission (Commission) at the state level and the Federal Energy Regulatory Commission (FERC) at the federal level.

Q. Please describe Ameren Services.

A. Ameren Services is also a wholly owned subsidiary of Ameren. Ameren Services operates as a centralized services company and was created to provide shared business and corporate services to Ameren's operating companies, including ATXI.

Q. What are your responsibilities as Chairman and President of ATXI?

A. I manage all aspects of ATXI's business. In this regard, I oversee the development and planning of new transmission for ATXI, including the second phase of the Northern Missouri Grid Transformation Program that is the subject of ATXI's application in this proceeding. I am also ultimately responsible for the operation of ATXI's transmission system and for policymaking related to that system.

Q. What are your responsibilities as Senior Vice President, Transmission for Ameren Services?

A. Among the many shared services that Ameren Services provides Ameren's operating companies, Ameren Services personnel provide Ameren's transmission-owning utilities—ATXI, Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois), and Union Electric Company d/b/a Ameren Missouri (Ameren Missouri)—planning, design, construction, engineering, and other transmission-related services. As the Senior Vice President, Transmission for Ameren Services, I oversee those Ameren Services personnel and the transmission services they provide. I am also responsible for transmission policy and regulatory activities related to

transmission on behalf of the Ameren operating companies, including the transmission-owning utilities' participation in the transmission-related aspects of MISO. And I am ultimately responsible for the operation of those utilities' integrated transmission systems, often collectively referred to as the "Ameren Transmission System."

Q. Please describe your professional and educational background.

A. I have more than 40 years' experience in the utility industry. I have worked for the Ameren family of companies since 1984, when I joined Illinois Power Company, a legacy utility of Ameren Illinois. I have held leadership positions overseeing, during that time, marketing, trading, and asset management, transmission, distribution and generation management, engineering, regulatory and risk management, and business and corporate planning functions, among others. Related to electric transmission specifically, my oversight has included regulatory and policy, development, operations, project management construction, engineering, and planning functions. I am a member of the Edison Electric Institute (EEI) CEO Business Continuity Task Force, Energy Delivery Public Policy Executive Advisory Committee, and EEI Unmanned Aircraft Systems Working Group. I have past served on the SERC Reliability Corporation Board. I have a master's degree in business administration from the University of Illinois at Urbana-Champaign, where I also earned a Bachelor of Science in engineering.

Q. Have you previously testified before the Commission?

A. Yes. I provided testimony on behalf of ATXI in Commission Dockets EA-2024-0302 (related to the first phase of the Northern Missouri Grid Transformation Program and its two projects, the Fairport-Denny-Iowa/Missouri border (FDIM) Project and the Maywood-Mississippi River Crossing (MMRX) Project), and EA-2018-0327 and EA-2017-0345 (related to the Mark

Twain Transmission Project), and Ameren Missouri in Commission Dockets ER-2008-0318 and ER-2007-0002. I have also provided testimony before the Illinois Commerce Commission and FERC.

II. PURPOSE OF TESTIMONY AND SCHEDULES

Q. What is the purpose of your direct testimony in this proceeding?

A. ATXI is working with the Missouri Joint Municipal Electric Utility Commission (MJMEUC) and Ameren Missouri, and collaborating with Associated Electric Cooperative, Inc. (AECI), on the Denny-Zachary-Thomas Hill-Maywood Project (DZTM Project or Project), which includes the construction of slightly over 200 miles of new 345 kV transmission lines or circuits along three transmission line segments. The first line segment of the DZTM Project will run approximately 102 miles or 107 miles (depending on the configuration option approved) from ATXI's new Denny Substation in DeKalb County to ATXI's existing Zachary Substation near Kirksville, Missouri (DZ Segment). The DZ Segment consists of two configuration options: a single circuit option (the DZ Single Circuit Option), which would mostly be routed adjacent to existing or planned AECI transmission line corridors; or a double circuit option (the DZ Double Circuit Option) to be undertaken in collaboration with AECI and pursuant to which ATXI would rebuild a section of an existing AECI 161 kV transmission line in a double circuit configuration and build a separate greenfield section in a double circuit configuration with a planned AECI 161 kV transmission line, in order to co-locate the vast majority of the DZ Segment being double-circuited with 161 kV facilities owned by AECI. The second line segment will be approximately 60 miles in length and will connect the existing Zachary Substation to ATXI's existing Maywood Substation near Palmyra, Missouri (ZM Segment). The vast majority of the ZM Segment will be

routed adjacent to an existing ATXI transmission line (the Mark Twain line) and partially within the transmission corridor. The DZTM Project's third line segment consists of rebuilding approximately 44 miles of an existing Ameren Missouri single circuit 161 kV transmission line to a double circuit line within and overlapping the existing transmission corridor from the Zachary Substation to AECI's existing Thomas Hill Substation in Randolph County, and will largely be collocated on double circuit structures with the Ameren Missouri 161 kV circuit (ZT Segment).

The DZTM Project constitutes the second phase (Phase 2) of the Northern Missouri Grid Transformation Program (Program), which represents the Missouri jurisdictional portion of 3 of the 18 Multi-Value Projects (MVPs) approved by MISO as part of its Long Range Transmission Planning (LRTP) Tranche 1 Portfolio incorporated into the 2021 MISO Transmission Expansion Plan (MTEP21), and is largely designed to be operated in conjunction with the two projects that constitute Phase 1 of the Program and are the subject of pending File No. EA-2024-0302.

The DZTM Project represents one of the MVPs approved by MISO as part of its LRTP Tranche 1 Portfolio for inclusion in the 2021 MISO Transmission Expansion Plan (MTEP21) and was eligible for MISO's Competitive Developer Selection Process. MISO issued a Request for Proposals (RFP) for DZTM on June 2, 2023. On April 2, 2024, MISO chose ATXI to be the Selected Developer for the DZTM Project and recognized MJMEUC as a project partner. ATXI partnered with MJMEUC on the DZTM Project and will transfer to MJMEUC a 49% interest in

the competitive portions of the Project to be owned by ATXI, detailed below,[1] shortly before the project is placed into service.

Tranche 1 included Project 10, which is the DZTM Project and, as discussed above, consists of two new single-circuit 345 kV transmission lines, a replaced 161 kV transmission line, a new 345 kV conductor-only circuit that will share structures with the replaced 161 kV line, and several new 345 kV line positions at related substations. All Project 10 facilities will be in Missouri.

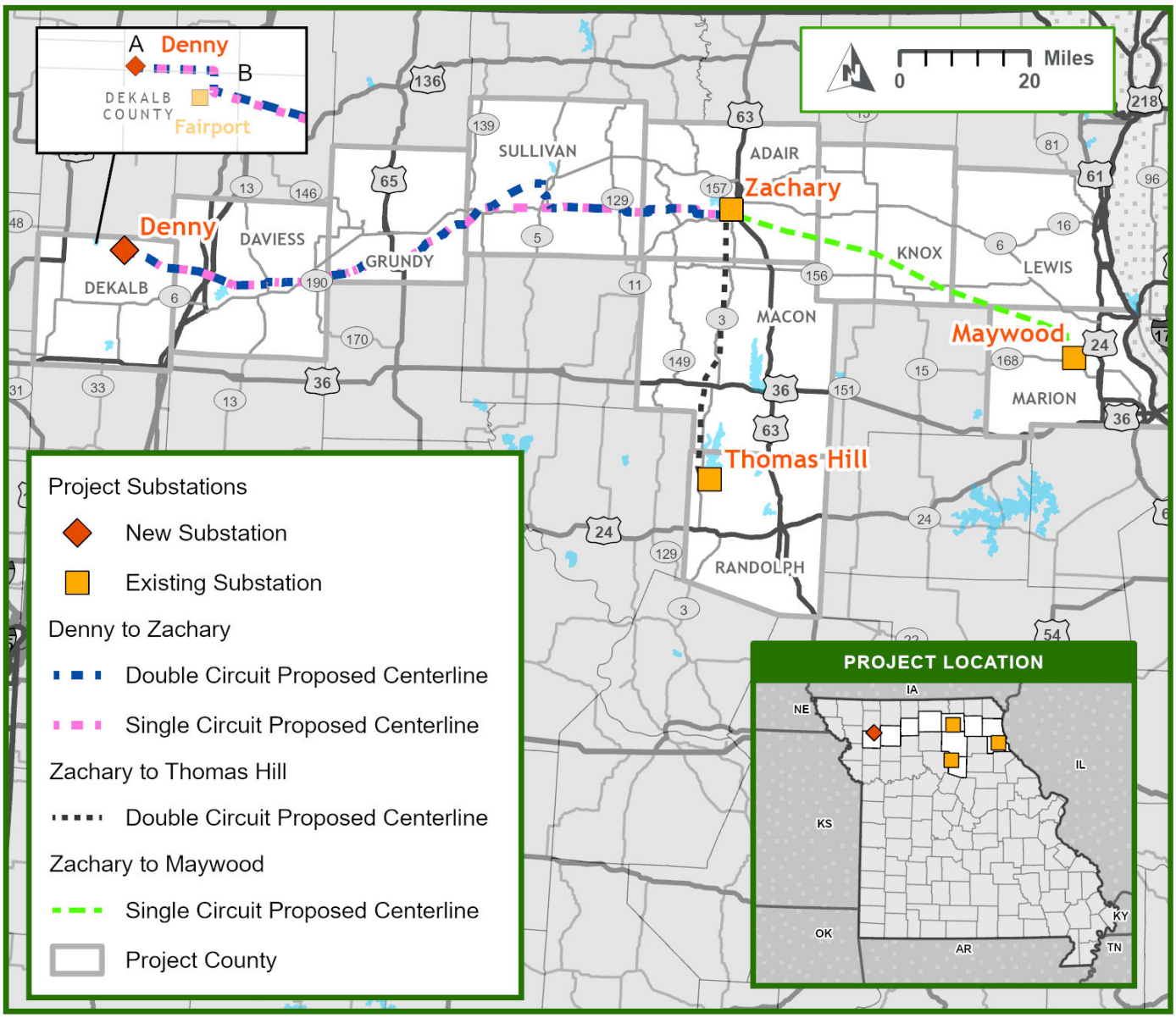
The two new 345 kV transmission lines and the new conductor-only 345 kV circuit were eligible for MISO's Competitive Developer Selection Process. These facilities consist of (1) a new single-circuit 345 kV transmission line that will run from ATXI's Denny Substation to ATXI's Zachary Substation, (2) a new single-circuit 345 kV transmission line that will run from Zachary to ATXI's existing Maywood Substation, and (3) new 345 kV conductor, insulators, and hardware on replaced transmission line structures that will run from Zachary Substation to AECI's Thomas Hill Substation and share 161/345 kV structures replaced by ATXI.[2]

The general location of the DZTM Project line segments is illustrated in the Figure 1 below:

[1] MJMEUC's ownership interest excludes the portions of the DZTM Project that were not subject to competitive development (i.e., directly assigned by MISO). The direct assigned scope of the DZTM Project includes the replacement structures and reinstallation of the Ameren Missouri 161 kV circuit on the DZ Segment. MJMEUC's ownership interest will also exclude AECI's 161 kV circuit on the DZ Segment if the DZ Double Circuit Option is approved by the Commission.

[2] The direct assigned scope of the DZTM Project includes the replacement structures and reinstallation of the Ameren Missouri 161 kV circuit on the ZT Segment.

Figure 1 – DTZM Project Overview



Among other benefits, the Program, including the Phase 2 DZTM Project, will support lower energy supply costs for Missouri customers, improve energy reliability for local communities and the surrounding region, promote access to diverse energy resources, and support the growth of economic development opportunities by adding needed transmission capacity in the State. This will help ensure continued energy reliability and resiliency for Missouri electricity

customers. In this proceeding, ATXI is requesting certain approvals from the Commission to make the Project, and the Program, a reality and deliver their many benefits to Missouri electricity customers.

The purpose of my direct testimony is to support the DZTM Project and ATXI's requested approvals. Toward that end, my testimony covers four topics. First, I introduce the other witnesses who are providing direct testimony in support of the DZTM Project and ATXI's requests, and who describe the Project in greater detail. Second, I provide an overview of the Program and the Phase 2 DZTM Project, including an overview of the need for the Project and its many benefits to Missouri and the broader Midwest region. Third, I identify the specific Commission approvals ATXI is requesting related to the Phase 2 DZTM Project and I explain, at a high level, why the Commission should grant those approvals. Finally, I address ATXI's other regulatory commitments related to the DZTM Project.

Q. Are you sponsoring any schedules with your direct testimony?

A. No.

Q. Are you offering any legal opinions in your direct testimony?

A. No. Although I refer to and offer my lay understanding of several Missouri statutes and regulations, I am not an attorney and none of my direct testimony is intended to offer any legal opinions.

III. INTRODUCTION OF OTHER WITNESSES

Q. Who are the other witnesses providing direct testimony in support of ATXI's application in this proceeding?

A. The other witnesses and the topics of their testimony are:

- **Nick Rudis, Project Manager, Ameren Services.** Mr. Rudis is the Project Manager for the Project, and he addresses aspects of the Project's construction. He generally explains the scope of the construction work for the Project, the expected construction cost, and the division of work and cost between ATXI, MJMEUC, Ameren Missouri, and AECI, as contemplated in the various commercial agreements between the entities. Mr. Rudis explains the differences in terms of costs, construction activity, and maintenance activity, between the DZ Double Circuit Option and the DZ Single Circuit Option. He also explains where construction will occur relative to the right-of-way for the Project. He also explains how ATXI, and specifically Ameren Services, who will construct the Project on ATXI's behalf, are capable of and will effectively manage and supervise construction of the Project, and the actions that ATXI will undertake to ensure adequate and efficient construction and supervision of the Project. Finally, Mr. Rudis explains the construction schedule and in-service dates.
- **Justin Davies, Director of Transmission Planning, Ameren Services.** Mr. Davies generally explains how the Ameren Services Transmission Planning group, on behalf of Ameren's transmission-owning utilities, including ATXI, studies and plans for the Ameren Transmission System in Missouri. His testimony provides additional support regarding how the Project meets the Tartan criteria related to need and public interest from an Ameren Transmission System perspective. Mr. Davies also explains Ameren

Services Transmission Planning's role in MISO's planning processes and its role in the MISO processes that drove the LRTP Tranche 1 Portfolio and the Project specifically. Additionally, Mr. Davies explains how, as a result of those processes, MISO and the Ameren Services Transmission Planning group determined that the Project is necessary. Mr. Davies also generally addresses additional reliability and system performance benefits of the Project.

- **Jeremiah Doner, Director of Cost Allocation and Competitive Transmission, MISO.**[3] Mr. Doner explains how and why the Program, including the Phase 2 DZTM Project, came to be. Specifically, he describes MISO's commitment to reliability and its various transmission planning initiatives. That commitment and certain of those initiatives drove MISO, in collaboration with transmission owners, including ATXI, and other stakeholders, to identify a regional transmission expansion plan within MISO, known as the LRTP Tranche 1 Portfolio (which includes the Missouri jurisdictional portion of which is the Program), needed to address the reliability implications of the Midwest region's changing energy fleet and the increasing and changing nature of customer demands. The Project comprises a part of the Missouri portion of that Tranche 1 transmission expansion plan. And he explains, at a high level, the regional benefits of the LRTP Tranche 1 Portfolio and how the costs of the portfolio are shared across customers in MISO's Midwest Subregion.

[3] It is ATXI's understanding that MISO intends to move to intervene and file the direct testimony of Mr. Jeremiah Doner in support of the Application shortly after ATXI's filing of its Application and direct testimony. All references to the direct testimony of MISO witness Mr. Jeremiah Doner reflect ATXI's understanding of his forthcoming testimony.

- **Dr. Todd Schatzki, Principal, Analysis Group, Inc.** Dr. Schatzki explains how the Program, including the Phase 2 DZTM Project, meets the Tartan criteria related to need, economic feasibility, and public interest. He explains the Program would be expected to provide the state of Missouri with many positive economic benefits in excess of its costs, thus demonstrating that the Program is necessary, in the public interest, and economically feasible. Dr. Schatzki also explains how the Program will serve to advance the State's environmental goals with respect to lower air emissions for Missouri.
- **Adam Molitor, Transmission Line Engineer, Ameren Services.** Mr. Molitor explains the design specifications for the Project's transmission lines and support structures. He also explains the right-of-way width that will be needed to accommodate the Project's transmission lines, including the easements that will be needed during construction of the Project. Mr. Molitor also explains the specific line work that will be undertaken to construct the line segments that collectively comprise the DZTM Project.
- **Greg Gudeman, Director of Transmission Financial & Regulatory Services, Ameren Services.** Mr. Gudeman explains the financing required for the Project, and the overall Program, and ATXI's ability to finance without adverse financial consequences. His testimony explains how ATXI meets the Tartan criteria related to financial ability and economic feasibility. Mr. Gudeman also explains how costs will be shared across MISO's Midwest Subregion and recovered via ATXI's FERC-regulated transmission rates from customers in that subregion, including customers in Missouri. He also explains the estimated level of costs that will be borne by all Missouri customers, including Ameren Missouri electric residential customers.

- **Matt Hoven, Real Estate Specialist, Ameren Services.** Mr. Hoven addresses real estate matters concerning the DZTM Project. Specifically, he explains the miles and width of the right-of-way required for the Project's transmission lines and describes the area traversed by the lines. He also generally explains the land rights that ATXI will need to construct the Project, and explains the potential effect that construction of the Project may have on landowners, and how Ameren Services, on behalf of ATXI, will mitigate that effect. He also discusses the differences with regard to property impacts with the DZ Double Circuit Option versus the DZ Single Circuit Option
- **Leah Dettmers, Manager of Stakeholder Relations and Training, Ameren Services.** Ms. Dettmers explains ATXI's compliance with certain pre-filing public meetings and notice requirements related to the Projects. Ms. Dettmers also describes ATXI's Public Engagement Team's extensive, multi-phased, multi-faceted, and deductive public outreach process for the Project, including how that process informed the routes analyzed by, and the proposed route ultimately chosen by, the Routing Team for the transmission lines. Ms. Dettmers also identifies ATXI's outreach efforts to consult with the pertinent federal, state, and local agencies for other, non-Commission regulatory approvals that may be required for the Project.
- **Dan Schmidt, Senior Project Manager, HDR, Inc.** Mr. Schmidt explains how ATXI's Routing Team selected the route that ATXI is proposing for the Project's transmission lines, which is referred to in this Application as the "Proposed Route," including the differences for the Proposed Route with the DZ Double Circuit Option and the DZ Single Circuit Option. Related, Mr. Schmidt sponsors the Routing Study for the Project, which describe in detail the processes, criteria, data, and other information that the

Routing Team used to analyze potential routes for the Project's line segments and ultimately select the Proposed Route. Additionally, Mr. Schmidt identifies certain criteria along the Proposed Route that may implicate other state and federal requirements related to construction along the Proposed Route.

IV. THE NORTHERN MISSOURI GRID TRANSFORMATION PROGRAM

A. Benefits and Need

Q. You testified that Phase 2 of the Program consists of the DZTM Project, described the Project and the Program, and further explained that the Project is part of MISO's LRTP Tranche 1 Portfolio. Can you further describe the relationship and purpose of the Project, the Program, and MISO's long range transmission plan?

A. Yes. Although the entire Program must be approved and constructed for its benefits to be realized, the facilities included in this filing comprise the second (and final) phase of the Program. The Phase 2 DZTM Project specifically comprises the second part of the Missouri portion of a regionally beneficial transmission expansion plan known as the LRTP Tranche 1 Portfolio. The LRTP Tranche 1 Portfolio was identified by MISO, working with other stakeholders, as necessary to address the challenges to the transmission grid in its footprint, which includes a portion of the grid in Missouri, posed by a changing energy landscape. The LRTP Tranche 1 Portfolio, including the Missouri portion, starts to accomplish this by adding needed transmission capacity to the grid. The added capacity ensures grid reliability and resiliency and promotes access across the region to and by a diversifying energy resource mix, in turn reducing costs both for generators and the electric consuming public in Missouri. Notably, the LRTP Tranche 1 Portfolio is the first of several tranches of regionally beneficial MISO transmission expansion plans that

address system constraints and will likely be needed to respond to and ready the grid for the changing energy landscape.

Q. What do you mean by the changing energy landscape?

A. I mean the significant transformation that the electric industry is experiencing, including in Missouri. Across MISO, state policies, utility resource plans, general environmental awareness, and consumer preferences are driving a cleaner, reduced carbon future. Within this broad footprint the availability of wind, solar, and other distributed and renewable generation resources is therefore expanding, while certain conventional generation resources, like coal generating stations, are winding down or retiring altogether, and other generating resources, like gas peaker units, are being developed to promote reliability. At the same time, customer demand for electricity as a primary energy source is growing. In addition to increased reliance on electricity generally, and related expectations for increased reliability, we are also seeing evolving types of use cases, such as consumption associated with beneficial electrification programs and electronic data storage. So too must the grid evolve to meets these demands and react to changing conditions and customer expectations.

Q. Why does the transmission grid need to be readied for that change?

A. Just as roads need to be built or expanded over time in response to the demands of our traveling society, so must the electric transmission grid that moves the energy that we all rely on every minute of every day be adapted to meet society's changing needs. The energy industry shift poses complex and urgent reliability challenges for the transmission grid that customers rely on for electricity. Therefore, MISO, Transmission Owners (TOs), states, and other stakeholders

responsible for ensuring the reliable and cost-effective delivery of electricity to the public need to work together to respond to the shift if they are to continue to meet their reliability commitments.

Q. Why does the grid need to be readied *now* for the future of energy?

A. Because the industry shift is happening now. Thus, MISO, TOs, states, and other stakeholders must plan today for the future of energy. A transitioning generation fleet and increasing customer demand for electricity is a present reality, so we must plan accordingly. That planning cannot be delayed, since transmission expansion plans like MISO's LRTP Tranche 1 Portfolio can take upwards of ten years to complete, from planning to in-service date.

Q. How did the Program come to be?

A. The Program, including the DZTM Project that makes up Phase 2 of ATXI's Program in Missouri, is the culmination of several multi-faceted, iterative, stakeholder-informed MISO initiatives to study and address the complex and urgent challenges to the grid posed by the changing energy fleet. Perhaps most notable of these initiatives is MISO's LRTP study, which is the most complex transmission study in MISO's history. MISO undertook the LRTP study beginning in 2019 to identify an updated regional transmission backbone that would ensure a reliable, resilient, and cost-effective transmission system as the resource mix in MISO changes over the next 20 years in response to utility, state, and federal goals and policies toward a reduced carbon future. The LRTP Tranche 1 Portfolio transmission expansion plan, including the Missouri portion that includes the DZTM Project, was specifically borne of the LRTP study. MISO witness Mr. Doner explains MISO's transmission planning processes in more detail, including the specific initiatives that precipitated the LRTP Tranche 1 Portfolio and, within it, this Project.

Q. Do you have any other comments in this regard?

A. Yes. The LRTP Tranche 1 Portfolio is notable because it represents the beginning of the next wave of regional transmission planning and is fundamental to the success of meeting future demands. As I mentioned, the LRTP Tranche 1 Portfolio is the first of several anticipated tranches of transmission expansion that will be needed to respond to and ready the grid for the changing energy fleet and increasing customer reliance on electricity. The LRTP Tranche 1 Portfolio is also notable, I believe, for yet another reason. It reflects substantial collaboration among MISO, TOs, including ATXI and Ameren Missouri, states, and other stakeholders toward collectively addressing regional grid challenges. This collaboration benefits customers insofar as it supports the continued development of an economically efficient, reliable, and resilient transmission grid across the MISO Midwest Subregion.

Q. How, specifically, does the Program, including the DZTM Project, ready the grid in Missouri?

A. The Program will add needed capacity to the Ameren Transmission System in Missouri. This will help facilitate the clean energy transition by promoting Missouri customer access to energy from more diverse resources and permitting generators in Missouri, and beyond, to more efficiently and effectively bring their product to market. It will also ensure sustained and foster improved reliability for Missouri communities as well as support lower energy supply costs into, out of, and within Missouri. As ATXI witness Mr. Davies explains, the Program is designed to accommodate the changing nature of the future grid and addresses identified thermal and voltage-instability issues in Missouri. He also explains that the Program will also enable new generation and facilitate transfers into and out of Missouri, reducing the overall Adjusted

Production Cost (APC) for customers. Finally, he explains that MISO found the Program will improve the overall voltage profile of the state, reducing the need to add reactive power resources.

Q. Did MISO quantify any of these benefits?

A. Yes. As explained in the direct testimony of MISO witness Mr. Doner, MISO quantified the LRTP Tranche 1 Portfolio's benefits on both a Midwest Subregion basis and by MISO local resource zone, including Zone 5, which encompasses the MISO-jurisdictional portion of Missouri, including much of Northern Missouri. MISO specifically quantified minimum and maximum net benefits[4] from regional congestion and fuel savings, avoided capital costs of local resources, avoided transmission investment, resource adequacy savings, avoided risk of load shedding, and decarbonization to the Midwest Subregion totaling $23.2-52.2 billion and to Zone 5 totaling $2.2-4.7 billion. MISO further found that these benefits far exceed MISO's estimated cost to implement the LRTP Tranche 1 Portfolio transmission expansion plan. MISO identified a benefit-to-cost ratio of the LRTP Tranche 1 Portfolio to the MISO Midwest Subregion of 2.6 to 3.8 times, and to MISO Zone 5 of 3.0 to 4.2 times.[5]

Q. Are there other benefits of the Program, including the DZTM Project, to Missouri specifically?

A. Yes, many. As ATXI witness Dr. Schatzki explains, the Program, including the Phase 2 DZTM Project, will provide certain economic and market benefits to Missouri, including lower wholesale electric energy prices and wholesale energy market payments, and reduced air

[4] The minimum values reflect 2022 net present values over a 20-year time period using a 6.9% discount rate. The maximum values reflect 2022 net present values over a 40-year time period using a 6.9% discount rate.

[5] The benefit-to-cost ratios are based on MISO's calculation of 2022 net present values over a 20-year time period using a 6.9% discount rate.

pollutant emissions. As ATXI witness Mr. Davies explains, Phase 2 will provide additional reliability and system performance benefits to the Ameren Transmission System that customers rely on for electricity service in Missouri, including resiliency in the face of extreme weather events, through enhanced operational flexibility of the grid and resource sharing across the areas.

Additionally, although ATXI has not quantified the related dollars, I would expect Phase 2 to generally provide two other benefits to Missouri. First, transmission projects of this size can reasonably be expected to create jobs and otherwise promote economic development opportunities in Missouri. Second, the DZTM Project will also provide a source of additional revenues for Missouri in the form of property, sales, and income taxes.

B. Cost

Q. What will the Program and the Phase 2 DZTM Project cost to construct?

A. ATXI estimates that the total cost to construct the entire Program, including Phase 1 and Phase 2, is $611.1 million.[6] ATXI estimates that its total cost to construct just Phase 2 is, depending on a single circuit configuration or a double circuit configuration on the DZ Segment, $442.1 million[7] or $490.6 million[8]. These estimates include, respectively, all Program or Phase 2 construction, both transmission line and substation work, as well as needed real estate rights. ATXI witness Mr. Rudis explains the estimated costs, including how they were derived.

[6] Program costs, as used in this filing, differ slightly from the total cost of LRTP Tranche 1 Portfolio scope located in Missouri, due to the fact that there is a relatively small amount of work and costs that ATXI is not responsible for constructing or funding (approximately $15.5 million in upgrades to AECI facilities, based on MISO cost estimates).

[7] Total DZTM Project cost using the DZ Single Circuit Option configuration on the DZ Segment.

[8] Total DZTM Project cost using the DZ Double Circuit Option configuration on the DZ Segment.

Q. Who will pay for the DZTM Project?

A. ATXI will initially fund the DZTM Project costs. ATXI partnered with MJMEUC on the DZTM Project and will transfer a 49% ownership interest in the competitive portions of the DZTM Project facilities that will be owned by ATXI to MJMEUC before the Project is placed into service. Payment responsibility is further explained in the direct testimony of ATXI witness Mr. Rudis. ATXI will later recover its investment via transmission rates approved by FERC. MJMEUC will flow its Project costs through its own formula rate. Because the DZTM Project is part of a regionally beneficial transmission plan, it is eligible for regional cost sharing, and MISO divided the LRTP Tranche 1 Portfolio into eighteen integrated MVPs for that purpose. In 2022, FERC approved a cost allocation approach for the LRTP MVPs. Consistent with that approach, Missouri customers in the AMMO Pricing Zone will pay for only a portion of the Project (and Program)—approximately 7.25% of their total cost—with the remainder to be paid for across MISO's Midwest Subregion. To put these charges into context, the Program's year one cost per electric residential customer will be approximately 16 cents per month. ATXI witness Mr. Gudeman and MISO witness Mr. Doner explain further how the total costs are allocated and recovered across the MISO Midwest Subregion, including from customers in Missouri.

C. <u>Route, Siting, and Public Input</u>

Q. Where will the DZTM Project be sited in Missouri?

A. The overview and detailed maps attached to ATXI's Application as **Appendices E, F, and G** shows the Proposed Route for DZTM. As shown on those maps, the DZTM Project spans across ten Missouri counties: DeKalb, Daviess, Grundy, Sullivan, Adair, Knox, Lewis, Marion, Macon, and Randolph.

The Denny-Zachary line segment will run approximately 102 miles (single circuit configuration) or 107 miles (double circuit configuration) from ATXI's new Denny Substation in DeKalb County to ATXI's existing Zachary Substation near Kirksville, Missouri. The DZ Single Circuit Option would mostly be routed adjacent to existing or planned AECI transmission line corridors. The double circuit option, which would be undertaken in collaboration with AECI, would be located within an existing AECI transmission corridor for a majority of the line segment, but would also include a portion of greenfield construction within a new corridor.

The ZM Segment will connect the existing Zachary Substation near Kirksville, to ATXI's existing Maywood Substation near Palmyra, Missouri, routed adjacent to ATXI'S existing transmission line and partially within its corridor.

The Zachary-Thomas Hill line segment consists of rebuilding an existing Ameren Missouri single circuit 161 kV transmission line to a double circuit line partially within the existing transmission corridor, from the Zachary Substation to AECI's existing Thomas Hill Substation in Randolph County, Missouri.

ATXI witness Mr. Schmidt describes the Proposed Route for the Project in more detail.

Q. Was the Proposed Route informed by public input?

A. Yes. As explained by ATXI witnesses Mr. Schmidt and Ms. Dettmers, in April 2024 – following selection of ATXI as the developer for the DZTM Project by MISO – ATXI conducted its public engagement campaign, including an in-person public meeting in each county where the DZTM Project is located. Based on the information collected at the meetings, the Routing Team re-evaluated the initial routes it had identified for each of the DZTM line segments to ensure they were the most advantageous overall. ATXI witness Ms. Dettmers explains ATXI's public outreach

process in depth and attaches to her direct testimony an Engagement Summary detailing ATXI's public engagement efforts and the public input it solicited as a result.

Q. Generally, how will the DZTM Project affect the land traversed by the transmission lines?

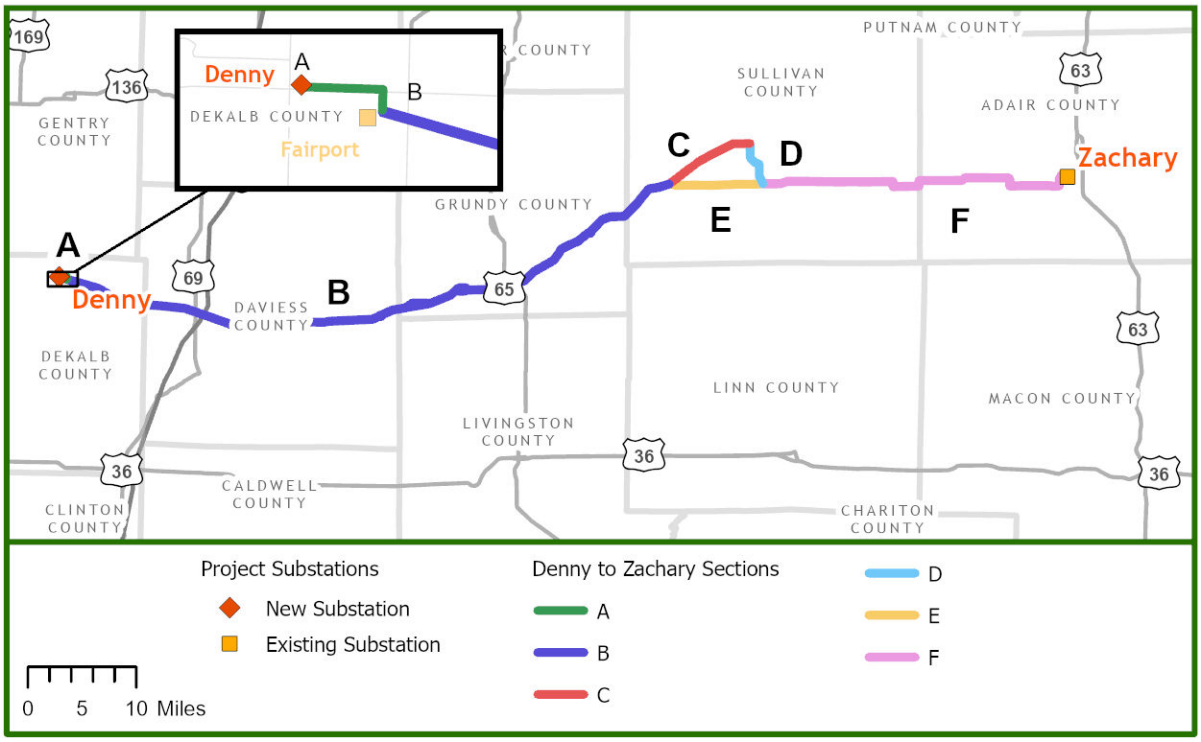
A. As explained by ATXI witness Mr. Schmidt, the goal of ATXI's route selection process was to identify and compare transmission line routes that achieve the aims of the project while minimizing the overall impacts on land use, ecological, and cultural features, including attempting to utilize corridors for the route along or adjacent to existing linear infrastructure, or within existing corridors, to the extent practical, while also considering economic and technical feasibility. The typical, permanent right-of-way required for the Project will be 150 feet in width, which is the standard needed to accommodate 345 kV transmission lines per the National Electric Safety Code (NESC) clearances and ATXI's vegetation management requirements. Accordingly, easements of that width will be needed for most of the Proposed Route for ATXI to safely construct, own, operate, and maintain the Project transmission lines. ATXI witnesses Mr. Molitor and Mr. Hoven explain further the real estate needs for the Project and the impact of the Project on the land it traverses.

Q. Are there design and route options for the Commission's consideration with respect to the DZ Segment?

A. Yes. As discussed above, ATXI is presenting the Commission with two options (one a double circuit configuration and the other a single circuit configuration) for the design and route of the DZ Segment identified, respectively, as the DZ Double Circuit Option and the DZ Single

Circuit Option. MISO selected the DZ Single Circuit Option.[9] If the Commission were to approve the DZ Double Circuit Option, ATXI would seek a change order from MISO to approve use of that option. The DZ Segment is depicted in the overview map contained in Figure 2 below, which is broken out into Sections labeled A through F to more precisely identify the differences in the route and scope of work for the DZ Single Circuit Option and the DZ Double Circuit Option.

Figure 2



The DZ Single Circuit Option consists of Sections A, B, E, and F, while the DZ Double Circuit Option consists of Sections A, B, C, D, and F. The DZ Single Circuit Option would mostly be routed on single circuit structures along the south side of existing (Sections B) or planned new (Section F) AECI transmission line corridors. The DZ Double Circuit Option would co-locate the

[9] ATXI originally submitted a double circuit option to MISO which it determined was beyond the scope of its request for proposals.

new 345 kV circuit on a single set of structures for the vast majority of the entire DZ Segment. Sections B and C of the DZ Double Circuit Option would rebuild an existing AECI 161 kV transmission line in a double circuit configuration and be co-located with AECI's line. Sections D and F of the DZ Double Circuit Option would construct a new greenfield double circuit line for co-location with a planned new AECI 161 kV transmission line. A more detailed description of each Section for the two options is contained in the direct testimony of ATXI witnesses Mr. Molitor and Mr. Dan Schmidt.

Q. What information is ATXI providing for the Commission's consideration with respect to the DZ Double Circuit Option and the DZ Single Circuit Option?

A. The DZ Double Circuit Option results in approximately $19.1 million in additional net costs after cost sharing, as discussed in the direct testimony of ATXI witness Mr. Rudis, but produces certain benefits with respect to reduced property impacts, as discussed in the direct testimony of ATXI witnesses Mr. Hoven, Mr. Molitor, and Mr. Rudis. The DZ Double Circuit Option requires approximately 1,220 less new easement area acres[10] than the DZ Single Circuit Option (619 vs. 1,839) since it overlaps ATXI's existing or planned transmission corridors, which is roughly a 66.3% decrease in new easement area acres. It also results in lower construction activity impacts since both ATXI's and AECI's new lines for Sections D and F would be built together as part of a single construction project under the DZ Double Circuit Option, whereas under the DZ Single Circuit Option Section F would be subject to separate construction projects

[10] The reference to "new easement area acres" refers to easement area not previously encumbered by an existing or otherwise planned easement by ATXI or another entity. For example, if all or part of a required easement area was not encumbered by an existing easement or would not be encumbered by an easement that is planned notwithstanding the DZTM Project, but would be encumbered by a new easement for the applicable line segment/option, then the applicable easement area would constitute new easement acres.

by two different companies at two different times. The DZ Double Circuit Options also reduces the number of structures on landowner property since both lines would share a single set of structures, which also reduces structure maintenance activity. From a property impact perspective, having a single construction project with the DZ Double Circuit Option instead of two separate construction projects with the DZ Single Circuit Option can be expected to have less impact on public roads, less soil compaction, and lower overall amounts of construction equipment and activity. Similarly, the reduced level of maintenance activity associated with the DZ Double Circuit Option would result in a corresponding reduction to associated property impacts.

As discussed by ATXI witness Mr. Hoven, the DZ Double Circuit Option, with a narrower footprint, less structures, and less/lower construction/maintenance impacts, would have less vegetation clearing and could have less impact on farming activities, farm production, irrigation pivots, and the potential of noxious weeds and crop loss in agricultural areas. As discussed in the direct testimony of ATXI witness Ms. Leah Dettmers, the feedback ATXI has obtained from its public engagement activities indicates a substantial preference for the DZ Double Circuit Option.

D. Construction Work Scope

Q. Generally, what is the scope of work for the Project within its right-of-way?

A. The transmission line scope of work generally consists of two types of construction, greenfield (new) construction and brownfield (rebuild) construction.

Brownfield construction will occur on the ZT Segment, where ATXI will rebuild approximately 44 miles of an existing Ameren Missouri 161 kV transmission line to a double circuit 345 kV/161 kV transmission line.

On the ZM Segment there will be approximately 60 miles of greenfield construction.

On the DZ Segment, the amount of greenfield or brownfield construction depends on the configuration. For the DZ Single Circuit Option configuration, approximately 101.7 miles would be greenfield construction. For the DZ Double Circuit Option configuration, co-locating with AECI's 161 kV line, this would entail approximately 71 miles of brownfield construction and 35.9 miles of greenfield construction. Mr. Rudis describes in more detail the types of construction and the lengths in his direct testimony.

Q. Who, specifically, will build the Projects?

A. Ameren Services transmission personnel will manage and supervise construction of the DZTM Project on behalf of ATXI and its Program partners. As it does regularly for large transmission construction projects, Ameren Services will employ independent contractors and consultants to construct Phase 2. Ameren Services intends to use primarily union contractors. Further, Ameren Services' goal, on behalf of ATXI, is to use subcontractors and material suppliers local to the Project area, such as local lumber yards, concrete suppliers, and suppliers for miscellaneous items needed during construction, to the extent practicable. Ameren Services will also seek to provide opportunities for meaningful participation in the Project construction by Minority Business Enterprises (MBE) and minority and women tradespersons, including via programs established by primary contractors. Once in service, Ameren Services transmission personnel will also operate and maintain the Project facilities. ATXI witness Mr. Rudis explains this further.

Q. You stated that the 345 kV transmission lines will require new 150-foot-wide rights-of-way. Is ATXI seeking new easements of that width?

A. The DZTM Project will require 150-foot-wide right-of-way for the 345 kV circuits to comply with NESC clearances. ATXI plans to acquire new, 150-foot-wide easements for the entire length of the Proposed Route for the Project, including all necessary and appurtenant land rights, such as rights of ingress and egress and access for vegetation management.

However, although ATXI ultimately requires 150 feet of right-of way clearance for its 345 kV lines, and intends to acquire easements in its name for the full 150-foot right-of-way as part of the Project, for a substantial length of DZTM the easements required will overlap with existing transmission corridor easements. This will occur on the ZT Segment, the ZM Segment, and, if selected, the DZ Segment with the DZ Double Circuit Option.

ATXI witness Mr. Hoven explains further the approach to obtaining new easements for the Project in his direct testimony.

Q. Which utility, specifically, will seek the new easements?

A. Ameren Services real estate personnel will, on behalf of ATXI, seek new easements naming ATXI as grantee. ATXI witness Mr. Hoven also explains this.

Q. Do you have any other comments in this regard?

A. Yes. As ATXI witness Mr. Hoven explains, ATXI hopes to acquire all necessary land rights for the Project by negotiation. And it is committed to working with landowners toward that end, to the extent feasible, and to mitigate the impact of the Project on property interests.

Q. When will the Project be constructed?

A. MISO's completion date for its LRTP Tranche 1 Portfolio transmission expansion plan is June 2030. To accommodate that in-service date and any contingencies, Phase 2 is scheduled to be in service by December 2029. Ameren Services has developed preliminary construction schedules and milestones for each of the Phase 1 Projects that provide reasonable flexibility to accommodate any contingencies. ATXI witness Mr. Rudis describes these activities and the Phase 2 DZTM Project's construction schedule in more detail.

E. MJMEUC Partnership

Q. You explained that ATXI partnered with MJMEUC on the DZTM Project. Can you describe the nature and purpose of that partnership?

A. MJMEUC is a municipal joint action energy agency formed under the Joint Municipal Utility Commission Act to obtain sufficient, economical electrical power supply, energy management, and transmission services for the benefit of member municipal utilities. ATXI's and MJMEUC's partnership pertains to all facilities within the DZTM Project that were subject to MISO's competitive development selection process and will be owned by ATXI. In general, ATXI will construct, operate, and maintain these facilities, but will transfer an undivided 49% interest to MJMUEC, with ATXI retaining an undivided 51% interest. ATXI and MJMEUC memorialized their respective commitments in a Joint Ownership Agreement (JOA). In simple terms, the JOA establishes that MJMEUC will contribute 49% of the costs to construct the competitive portions of the DZTM Project, as well as 49% of the costs to operate and maintain the FDIM facilities jointly owned with ATXI, with ATXI being responsible for 51% of such costs.

The partnership is mutually beneficial to MJMEUC and ATXI. For example, involving MJMEUC enables them to bring the benefits of the DZTM Project to the members/municipalities they serve. MJMEUC also benefits from ATXI's expertise in construction, operation, and maintenance of transmission projects. ATXI and, in turn Missouri customers, benefit from MJMEUC's lower cost of debt and preferable tax treatment. Thus, the partnership with MJMEUC enables MJMEUC and ATXI to provide reliability benefits and economic value for their transmission systems/members/customers, and to use Ameren Services' transmission expertise to construct, operate and maintain those projects, at lower overall costs to each partner (and to the customers who are served by these projects), relative to pursuing such projects individually. In fact, the partnership with MJMEUC and its resulting cost benefits was identified by MISO as one of the reasons for its decision to choose ATXI as the transmission developer on the DZTM Project.

ATXI's partnership with MJMEUC on the DZTM Project is explained in greater detail in the direct testimony of Mr. Rudis.

F. AECI Collaboration

Q. You explained that ATXI is collaborating with AECI on portions of the DZTM Project. Can you describe the nature and purpose of that collaborative effort?

A. ATXI's and AECI's collaboration pertains to the facilities within the DZ Segment, specifically on the DZ Double Circuit Option should the Commission approve this configuration/route. If approved or selected by the Commission, ATXI and AECI will rebuild an existing AECI 161 kV line to a double circuit line with ATXI's new 345 kV circuit, and construct a new double circuit 345 kV/161 kV greenfield section, co-locating ATXI's 345 kV with AECI's 161 kV in a new corridor.

ATXI and AECI are finalizing a Joint Use Agreement (JUA), detailing the shared investment in and joint use of the double circuit option on the DZ Segment. Under the terms of the proposed agreement, ATXI would construct the Project on behalf of AECI. AECI will own 100% of their 161 kV circuit and ATXI will own the structures and new 345 kV circuit (along with its partner MJMEUC as detailed in the previous section). In many respects, the collaboration is similar to the collaboration between ATXI and AECI on the Maywood to Zachary segment of the previous Mark Twain Transmission Project.

The collaboration is mutually beneficial to AECI and ATXI. AECI benefits by replacing aging AECI infrastructure and further extending their transmission service for their members and customers. ATXI benefits from the use of AECI's existing corridor on the rebuild section and overlapping with AECI's existing rights-of way to reduce the line's impact. AECI and ATXI both benefit from double circuiting in AECI's new, planned transmission corridor to reduce the overall footprint of the transmission corridor, compared with two single circuit transmission lines. Both AECI and ATXI benefit from a lowered cost to construct the greenfield facilities, and reduced costs for line and right-of-way maintenance by sharing in the expenses.

ATXI has presented this double circuit option to the public for opinion and is submitting it to the Commission for consideration. The results of public feedback and opinion are discussed in detail in the direct testimony of ATXI witness Ms. Dettmers.

V. COMMISSION APPROVALS AND WAIVERS

Q. What approvals is ATXI requesting from the Commission related to Phase 2?

A. ATXI is requesting approval for Phase 2 under two specific sections of the Revised Statutes of Missouri, Sections 393.170.1 and 393.190, and two sections of the Code of State

Regulations, 20 CSR 4240.20.045 and 20 CSR 4240-10.105. ATXI is also requesting the Commission to waive several requirements of its rules for good cause. I address the approvals and waiver requests below.

A. Section 393.170.1, RSMo and 20 CSR 4240-20.045

Q. Why is ATXI requesting approvals under Section 393.170.1, RSMo, and 20 CSR 4240-20.045?

A. It is my understanding that an electric utility without a certificated service area must generally have a line Certificate of Convenience and Necessity (CCN) from the Commission under Section 393.170.1, RSMo, authorizing the utility to construct, install, own, operate, control, manage, and maintain electric transmission infrastructure in Missouri. ATXI currently does not serve retail customers or have a CCN that would cover the portions of the Phase 2 DZTM Project that ATXI will construct, install, own, operate, control, manage, and maintain. Accordingly, ATXI is requesting a CCN and authorization under Section 393.170.1, RSMo, for its Phase 2 DZTM Project facilities. It is my understanding that 20 CSR 4240-20.045 is a rule adopted by the Commission that outlines the requirements for applications to the Commission for a CCN pursuant to Section 393.170.1, RSMo.

Q. What does Section 393.170, RSMo, require for issuance of a CCN?

A. I am not an attorney; however, it is my understanding that, among other things, Section 393.170 requires an applicant for a CCN to demonstrate that the proposed construction is "necessary or convenient for the public service." It is also my understanding that the Commission has stated that it will apply five criteria in CCN cases to determine whether the proposed service is necessary or convenient for the public service, commonly referred to as the Tartan factors:

(1) There must be a need for the service the applicant proposes to provide; (2) The applicant's proposal must be economically feasible; (3) The applicant must have the financial ability to provide the service; (4) The applicant must be qualified to provide the proposed service; and (5) The proposed service must be in the public interest.[11]

Q. Is ATXI providing the required Section 393.170 information?

A. Yes. The collective testimony of the ATXI witnesses and the MISO witness that I introduced above provide information demonstrating that the DZTM Project meets the requirements of Section 393.170, RSMo, and the Tartan factors. In sum, as explained throughout that testimony, the DZTM Project is necessary to provide continued adequate, reliable, and efficient electric transmission service to customers in Missouri and the MISO Midwest Subregion. Additionally, Ameren Services transmission personnel, who will construct, operate, and maintain the Project on behalf of ATXI have demonstrated construction supervisory and managerial experience and expertise, including related to transmission expansion projects of similar magnitude. Finally, ATXI has the financial wherewithal to construct, own, operate, and maintain the Project.

B. Section 393.190, RSMo and 20 CSR 4240-10.105

Q. Why is ATXI requesting approval under Section 393.190, RSMo, and 20 CSR 4240-10.105?

A. As I previously explained, ATXI has partnered with MJMEUC on the DZTM Project and, per the JOA, will transfer a 49% interest in certain Project facilities to MJMEUC

[11] *In re Tartan Energy Co.*, Report and Order, Case No. GA-94-127, 1994 WL 762882 (Sept. 16, 1994).

before the project is placed into service. It is my understanding that Section 393.190, RSMo, requires Commission approval prior to an electric utility transferring electric transmission infrastructure assets to another entity. Accordingly, ATXI is requesting approval of the proposed transfer to MJMEUC for the competitive portion of the DZTM Project facilities, as discussed above. It is my understanding that 20 CSR 4240-10.105 is a rule adopted by the Commission that outlines the requirements for applications to the Commission for the authority to sell, assign, lease, or transfer assets.

C. Waiver of Certain Commission Rule Requirements

Q. Is ATXI requesting other relief in connection with its request for a CCN for Phase 2?

A. Yes. It is my understanding that the Commission may grant a variance from or waive a requirement of its rules for good cause pursuant to 20 CSR 4240-2.205. Because ATXI will not provide retail service to end-use customers in Missouri and will not be rate-regulated by the Commission, certain requirements in the Commission's rules are neither applicable nor needed for ATXI and it requests that the Commission waive the depreciation study requirement of 20 CSR 4240-3.175, the reporting requirements of 20 CSR 4240-3.190(1), (2) and 3(A)-(D), the annual reporting requirement of 20 CSR 4240-10.145, and the rate schedule filing requirement of 20 CSR 4240-20.105, for good cause. ATXI will continue to file with the Commission the annual report it files with FERC.

VI. OTHER REGULATORY COMMITMENTS

Q. Will ATXI comply with all applicable rules and requirements of the Commission regarding construction of the DZTM Project?

A. Yes. As with any transmission project, ATXI and Ameren Services personnel on behalf of ATXI will comply with all applicable rules and requirements of the Commission regarding construction of the Project, including, specifically, 20 CSR 4240-18.010 governing Safety Standards for Electrical Corporations and adopting certain Parts of the NESC for the construction of electric power lines. ATXI witness Mr. Molitor addresses these requirements in his direct testimony.

Q. What notice has ATXI provided landowners who are directly affected by the Proposed Route and the new substation for the DZTM Project?

A. ATXI has included with its Application, as **Appendix D,** the verification of that landowner notice required by Commission Rule 4240-20.045(6)(K)(1). A list of the directly, or potentially, affected landowners to whom the notice was sent is provided as a confidential attachment to that appendix. A copy of the letter that ATXI sent to the landowners on said list as notice of its application is provided as **Schedule LD-D2** to the direct testimony of ATXI witness Ms. Dettmers.

Q. Has ATXI considered the potential impact of its Proposed Route on historical sites and environmentally delicate areas?

A. Yes. Ameren Services on behalf of ATXI assessed the Project areas as it concerns the potential impact on historical, environmental, and other similarly sensitive land uses as part of its routing analysis in an effort to minimize any such impact, as discussed in greater detail by ATXI

witnesses Ms. Dettmers and Mr. Schmidt. That said, the Proposed Route for DZTM takes advantage of existing transmission corridors for a significant length of the Project to mitigate potential impact on sensitive land uses.

Q. Will ATXI obtain all necessary permits, including environmental permits and river, stream, and lake crossing permits, prior to any construction requiring those permits?

A. Yes. Ameren Services on behalf of ATXI will obtain all required environmental permits prior to engaging in construction activities requiring those permits, as discussed by ATXI witnesses Ms. Dettmers and Mr. Schmidt.

Q. Will ATXI obtain all necessary highway and railroad crossing permits prior to any construction requiring those permits?

A. Yes. Again, Ameren Services on behalf of ATXI will obtain all required permits, including any permits required by the Missouri Department of Transportation, prior to engaging in construction activities requiring those permits, as discussed by ATXI witnesses Ms. Dettmers and Mr. Schmidt.

Q. Will ATXI also obtain required local approvals applicable to the Project before any construction requiring those approvals?

A. Yes. ATXI intends to obtain all required approvals, including for example the county assents required by Section 229.100, RSMo, prior to engaging in construction activities requiring those approvals.

VII. CONCLUSION

Q. What do you conclude regarding the Phase 2 DZTM Project and ATXI's

requested Commission approvals for the Project?

A. The Commission should approve ATXI's application and grant ATXI the CCN and relief that ATXI requests related to the Phase 2 DZTM Project, which is necessary or convenient for the public service. For the reasons I have explained, the LRTP Tranche 1 Portfolio transmission expansion plan, including the Missouri portion containing the DZTM Project, is critical and will improve reliability in Missouri and the MISO Midwest Subregion, bolster resilience and save customers money.

Q. Does this conclude your direct testimony?

A. Yes.

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 393.170.1, RSMo. relating to Transmission Investments in North Central Missouri.	))))))	File No. EA-2025-0087

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 Direct Testimony 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.

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

Date: December 11, 2024