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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2025-0087

DIRECT TESTIMONY

OF

MATT HOVEN

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

St. Louis, Missouri
December, 2024

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DIRECT TESTIMONY

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1 **I. INTRODUCTION AND BACKGROUND**

2 **Q. Please state your name and business address.**

3 A. My name is Matt Hoven. My business address is 1901 Choteau Ave., St. Louis,
4 Missouri 63103.

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

6 A. I am employed by Ameren Services Company (Ameren Services) as a Real Estate
7 Specialist in the Real Estate Department.

8 **Q. What are your responsibilities as Real Estate Specialist?**

9 A. My current job responsibilities include leading and coordinating real estate
10 requirements for linear transmission line projects. In this role, I coordinate and manage all required
11 real estate activities for transmission line projects on behalf of Ameren Corporation's (Ameren)
12 transmission-owning utilities, including Ameren Transmission Company of Illinois (ATXI). Those
13 real estate activities include, among other responsibilities, surveys, appraisals, acquisition of land
14 rights and permits, construction support, and damage settlements.

15 **Q. Please describe your educational and professional background.**

16 A. I graduated from Missouri State University in 1994 with a bachelor's degree in
17 finance. I have held a Missouri Real Estate Broker's license since the year 2000. I have been
18 employed by Ameren Services since January of 2002 and have been in the Real Estate department

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1 since being hired. I have held various positions within the Real Estate department including Real
2 Estate Representative, Senior Real Estate Representative, Senior Real Estate Agent, Real Estate
3 Supervisor, and currently Real Estate Specialist. My experience at Ameren Services includes
4 distribution projects, transmission projects, real property acquisition projects, and property
5 management and leasing. My current duties as Real Estate Specialist include leading electric
6 transmission projects with varying degrees of cost and complexity. I have been a member of the
7 International Right of Way Association (IRWA) since 2005. In 2007, I earned the SR/WA
8 designation (Senior Right-of-Way Agent) and in 2011 I earned the Negotiation/Acquisition
9 discipline with IRWA.

10 **Q. Have you previously testified before the Missouri Public Service Commission?**

11 A. No.

12 **II. PURPOSE OF TESTIMONY AND SCHEDULES**

13 **Q. Are you familiar with the electric transmission project for which ATXI is**
14 **requesting Commission approvals in this proceeding?**

15 A. Yes. ATXI, the Missouri Joint Municipal Electric Utility Commission (MJMEUC),
16 and Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) are working together to
17 build a more reliable and resilient energy grid for the future, and to construct, acquire, and operate
18 certain transmission assets as part of the Northern Missouri Grid Transformation Program (the
19 Program), which is described in the direct testimony of ATXI witness Mr. Shawn Schukar. The
20 Program encompasses the Missouri jurisdictional portion of 3 of the 18 Multi-Value Projects
21 (MVPs) approved by the Midcontinent Independent System Operator, Inc. (MISO) as part of its
22 Long-Range Transmission Planning (LRTP) Tranche 1 Portfolio incorporated into the 2021 MISO

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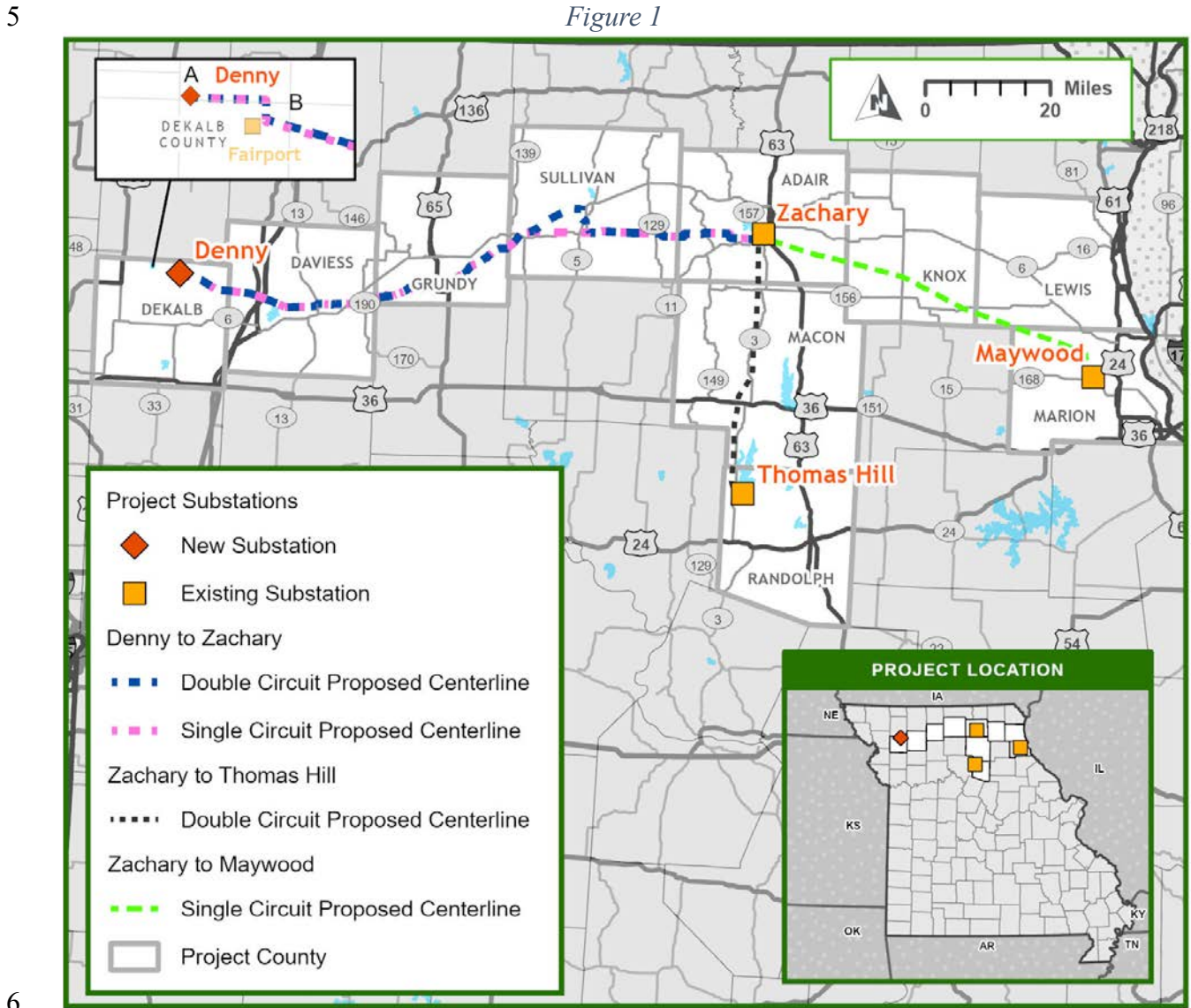
1 Transmission Expansion Plan (MTEP21). This proceeding concerns one of those projects, the
2 Denny-Zachary-Thomas Hill-Maywood (DZTM) Project (the Project or DZTM Project), which
3 constitutes the second phase (Phase 2) of the Program and is largely designed to be operated in
4 conjunction with the other two projects which constitute Phase 1 of the Program and are the subject
5 of pending File EA-2024-0302.

6 The DZTM Project includes the construction of slightly over 200 miles of new 345 kilovolt
7 (kV) transmission lines with three transmission line segments across ten Missouri counties:
8 DeKalb, Daviess, Grundy, Sullivan, Adair, Knox, Lewis, Marion, Macon, and Randolph. The first
9 line segment will run approximately 102 or 107 miles (depending on the design option approved
10 by the Commission) from ATXI's new Denny Substation in DeKalb County to ATXI's existing
11 Zachary Substation near Kirksville, Missouri (the DZ Segment). The DZ Segment consists of two
12 configuration options: a single circuit option (the DZ Single Circuit Option), which will mostly be
13 routed along existing or planned Associated Electric Cooperative, Inc. (AECI) 161 kV
14 transmission line corridors; or a double circuit option (the DZ Double Circuit Option), pursuant to
15 which ATXI will rebuild a section of an existing AECI 161 kV transmission line in a double circuit
16 configuration and build a separate greenfield section in a double circuit configuration with a
17 planned AECI 161 kV transmission line, in order to collocate the new 345 kV circuit on a single
18 set of structures for the vast majority of the DZ Segment. The second line segment will be
19 approximately 60 miles long and will connect the existing Zachary Substation to ATXI's existing
20 Maywood Substation near Palmyra, Missouri (the ZM Segment), routed adjacent to an existing
21 ATXI transmission line and partially within its existing easement corridor. The third line segment
22 consists of approximately 44 miles rebuilt on an existing Ameren Missouri 161 kV transmission
23 line from the Zachary Substation to AECI's existing Thomas Hill Substation in Randolph County

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1 (the ZT Segment) and will almost entirely be co-located on the same structures with Ameren
2 Missouri facilities. The Phase 2 DZTM Project is described in more detail in the direct testimonies
3 of ATXI witnesses Mr. Nick Rudis and Mr. Adam Molitor.

4 The Phase 2 DZTM Project is depicted in the overview map contained in Figure 1 below:



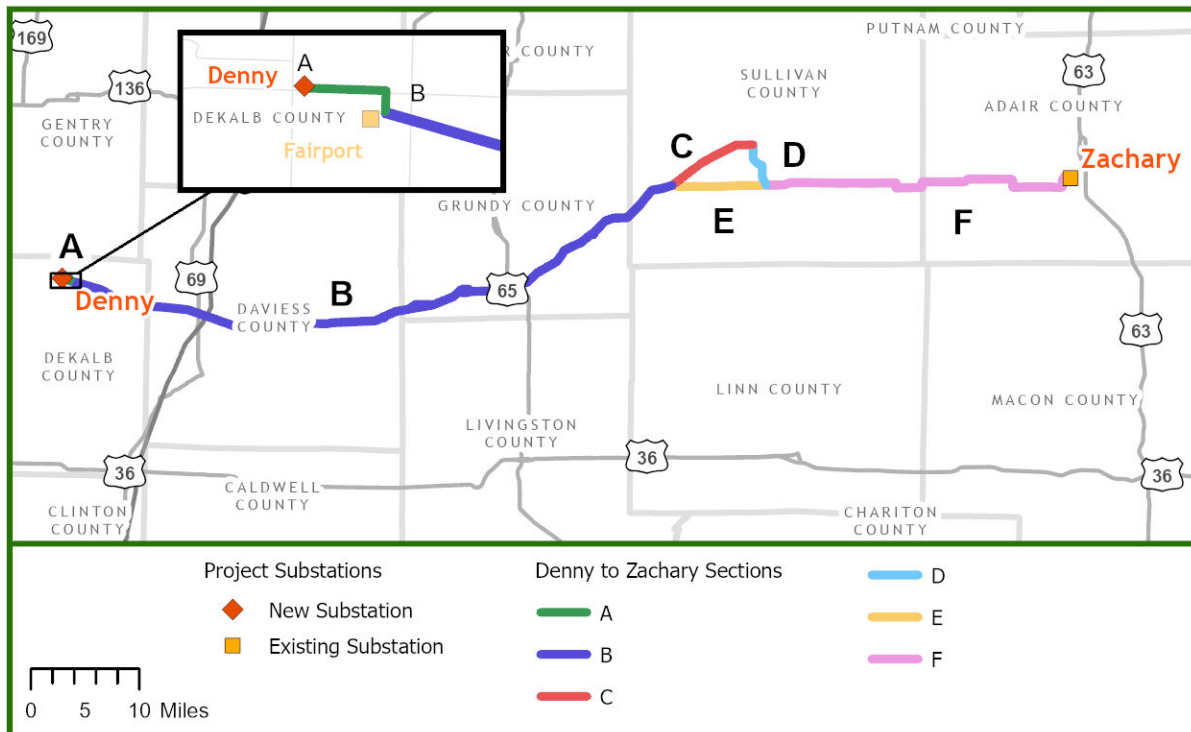
6
7 In this proceeding, ATXI is requesting certain approvals for the Phase 2 DZTM Project
8 from the Commission to make Phase 2 a reality and deliver the Program's benefits to Missouri
9 electricity customers.

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1 Q. Can you further describe the single circuit and double circuit configuration
2 and routing options for the DZ Segment?

3 A. Although it is my understanding that the entire Program must be approved and
4 constructed for its benefits to be realized, the Phase 2 DZTM Project, as discussed above, consists
5 of three line segments, with the DZ Segment having single and double circuit configuration/routing
6 options which are identified, respectively, as the DZ Single Circuit Option and the DZ Double
7 Circuit Option.¹ The DZ Segment is depicted in the overview map contained in Figure 2 below
8 which is broken out into Sections labeled A through F to more precisely identify the differences in
9 the route and scope of work for the DZ Single Circuit Option and the DZ Double Circuit Option.

10 *Figure 2*



11

¹ MISO selected the DZ Single Circuit Option. 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.

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1 The DZ Single Circuit Option in Figure 2 consists of Sections A, B, E, and F, while the DZ
2 Double Circuit Option consists of Sections A, B, C, D, and F. The DZ Single Circuit Option would
3 mostly be routed on single circuit structures along the south side of existing (Sections B) or planned
4 new (Section F) AECI transmission line corridors. The DZ Double Circuit Option would co-locate
5 the new 345 kV circuit on a single set of structures for the vast majority of the entire DZ Segment.
6 Sections B and C of the DZ Double Circuit Option would rebuild an existing AECI 161 kV
7 transmission line in a double circuit configuration and be co-located with AECI's line. Sections D
8 and F of the DZ Double Circuit Option would construct a new greenfield double circuit line for
9 co-location with a planned new AECI 161 kV transmission line. A more detailed description of
10 each Section for the two options is contained in the direct testimony of ATXI witnesses Mr. Adam
11 Molitor and Mr. Dan Schmidt.

12 **Q. Please explain the Ameren Services' Real Estate Department's role and**
13 **responsibilities related to the Phase 2 DZTM Project.**

14 A. The Ameren Services Real Estate Department supports all real estate efforts related
15 to the Phase 2 DZTM Project. We are a part of a team that includes, among other members, external
16 consultants devoted to developing the route for the Phase 2 DZTM Project. We assist in, plan for,
17 and otherwise support open houses and other public outreach for the Phase 2 DZTM Project.
18 Additionally, we will support acquiring the land rights needed to construct the Phase 2 DZTM
19 Project through arms-length negotiations with landowners. We also support obtaining the non-
20 environmental permits needed to construct the DZTM Project through consultations with agencies.
21 And we work to address through mutually agreeable damage payments or restoration of real estate
22 in the unintended and unlikely event of damage that may occur during the construction process.

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

2 A. I address various real estate matters concerning the Phase 2 DZTM Project.
3 Specifically, I cover three topics. First, I explain the miles and width of the right-of-way required
4 for the Phase 2 DZTM Project’s transmission lines, and I describe the area traversed by the lines.
5 Second, I generally explain the land rights that ATXI will need to construct the Phase 2 DZTM
6 Project. Finally, I explain the potential effect that the Phase 2 DZTM Project may have on
7 landowners’ property, and how Ameren Services will mitigate that effect.

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

9 A. Yes. I am sponsoring:

- 10 • Schedule MH-D1 – Legal Description for the DZTM Project’s Proposed Route
11 for the DZ Segment with the DZ Single Circuit Option;
- 12 • Schedule MH-D2 – Legal Description for the DZTM Project’s Proposed Route
13 for the DZ Segment with the DZ Double Circuit Option;
- 14 • Schedule MH-D3 – Legal Description for the DZTM Project’s Proposed Route
15 for the ZM Segment;
- 16 • Schedule MH-D4 – Legal Description for the DZTM Project’s Proposed Route
17 for the ZT Segment;
- 18 • Schedule MH-D5 (**Confidential**) – Landowner List; and
- 19 • Schedule MH-D6 – Agricultural Land (AG) Impact Mitigation Plan.

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

21 A. No. Although I refer to and offer my lay understanding of several Missouri
22 regulations related to the Phase 2 DZTM Project, I am not an attorney, and none of my direct
23 testimony is intended to offer any legal opinions.

1 **III. LAND RIGHTS NEEDED FOR THE DZTM PROJECT**

2 **A. Generally**

3 **Q. What is your understanding of the Proposed Route for the Phase 2 DZTM**
4 **Project?**

5 A. ATXI witness Mr. Schmidt explains the route that ATXI is proposing for the Phase 2
6 DZTM Project (the Proposed Route) for its three segments, including the differences between the
7 DZ Single Circuit Option and the DZ Double Circuit Option for the DZ Segment. ATXI's Proposed
8 Route for the Phase 2 DZTM Project's transmission lines is shown on Figure 1 above. The legal
9 descriptions for the Proposed Route's 150-foot-wide corridor for the Phase 2 DZTM Project are
10 contained in the following schedules attached to my testimony:

- 11 • Schedule MH-D1 – Legal Description for the DZTM Project's Proposed Route for the
12 DZ Segment with the DZ Single Circuit Option;
- 13 • Schedule MH-D2 – Legal Description for the DZTM Project's Proposed Route for the
14 DZ Segment with the DZ Double Circuit Option;
- 15 • Schedule MH-D3 – Legal Description for the DZTM Project's Proposed Route for the
16 ZM Segment; and
- 17 • Schedule MH-D4 – Legal Description for the DZTM Project's Proposed Route for the
18 ZT Segment.

19 **Q. Please generally describe the area to be traversed by the Proposed Route.**

20 A. The land traversed by the Phase 2 DZTM Project's transmission lines would be
21 mainly agricultural. Both row crop and pastureland are the dominant land uses in these areas.

1 **Q. Describe the easements required for the 150-foot corridors along the Proposed**
2 **Route.**

3 A. To accommodate the construction and future maintenance of the DZTM Project,
4 ATXI will need to acquire new 150-foot-wide easements, including easement rights for the
5 installation and maintenance of lines consisting of wires, cables, conduits, fixtures, appliances, and
6 other appurtenances thereto, for slightly over 200 miles of line. For Section A of the DZ Segment
7 (see Figure 2), ATXI will utilize the same 150-foot easement it is acquiring for the FDIM Project.
8 If the DZ Single Circuit Option is approved, the corridor for the ZT Segment will require 150 feet
9 of new greenfield easement that will generally abut the south edge of AECI's existing and planned
10 easement for its 161 kV line for Sections B and F and will not follow any existing corridor for
11 Section E (see Figure 2). If the DZ Double Circuit Option is approved, the required 150-foot
12 easement for Sections B, C, D, and F (see Figure 2) would include 50 feet of new greenfield
13 easement and 100 feet of brownfield easement that would overlap AECI's existing or planned
14 161 kV line easement. The new 50-foot easement would primarily be to the south of the existing
15 easement. The ZT corridor will require a 150-foot easement which includes 50 feet of new
16 greenfield easement and 100 feet of brownfield easement that would overlap Ameren Missouri's
17 existing 161 kV line easement. The new 50-foot easement would be substantially on the west side
18 of the existing easement. The ZM corridor will require a 150-foot easement which generally
19 includes approximately 52 feet of new greenfield easement and 98 feet of brownfield easement
20 that would overlap ATXI's existing 345 kV line easement. The new 52-foot easement would be to
21 the south of the existing easement.

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1 **Q. Will any other land rights be needed to construct the Phase 2 DZTM Project?**

2 A. Yes, most likely. Depending on site circumstances, off-easement access rights, such
3 as temporary construction rights required during the construction process, may be needed outside
4 of the right-of-way area. Further, ATXI may need ingress and egress rights for future access to the
5 transmission lines to safely operate and maintain the facilities. The standard easement agreement
6 that the Ameren Services Real Estate Department uses to acquire easement rights covers these
7 access, ingress, and egress rights.

8 **Q. What about access rights to maintain vegetation near the transmission lines?**

9 A. Vegetation management is necessary for the reliability of the lines and public safety.
10 Accordingly, the Ameren Services Real Estate Department's standard easement agreement
11 contains language that allows ATXI to trim, cut, clear, and remove trees and shrubs on or near the
12 easement area that may endanger the safety of or interfere with the right to maintain the reliability
13 of the transmission line. In areas where ATXI will be obtaining overlapping easements, it plans to
14 use existing access routes wherever possible.

15 **Q. What is the status of the land rights acquisition for the DZTM Project?**

16 A. As I explain further below, for the DZ Segment and ZM Segment ATXI will not
17 pursue easements from landowners until it obtains its certificate and other approvals from the
18 Commission. ATXI plans to pursue easements from willing landowners on the ZT line segment,
19 which includes 100 feet of brownfield easement and 50 feet of greenfield easement, prior to
20 obtaining its certificate and other approvals from the Commission. These easements will primarily
21 overlap with existing Ameren Missouri right-of-way and, as a result, present greater route certainty
22 than for the other segments.

1 **B. The DZ Segment**

2 **Q. What land rights are required for the DZ Segment of the DZTM Project?**

3 The DZ Segment will have approximately 101.7 miles of line with the DZ Single Circuit
4 Option or 106.8 miles of line with the DZ Double Circuit Option. As previously discussed, the DZ
5 Single Circuit Option consists of Sections A, B, E, and F in Figure 2, while the DZ Double Circuit
6 Option consists of Sections A, B, C, D, and F. Section A of the DZ Segment is the same for both
7 options, with ATXI utilizing the same 150-foot easement it is acquiring for the Phase 1 FDIM
8 Project. For the DZ Double Circuit Option, AECI currently has land rights in this area for Sections
9 B and C and will acquire land rights for Sections D and F; however, ATXI will be obtaining its
10 own 150-foot easement which, with a few limited exceptions where space limitations require
11 deviations from AECI's existing or planned lines, will be on top of AECI's existing or to be
12 acquired easements to accommodate this new circuit. ATXI's easement would overlap the 100-
13 foot AECI easement and require an additional 50 feet of greenfield easement. For the DZ Single
14 Circuit Option, ATXI would need to acquire 150 feet of greenfield easement for Sections B, E, and
15 F which would be adjacent to AECI's right-of-way for Sections B and F and not follow any existing
16 corridor for Section E.

17 **Q. Why is a 150-foot-wide right-of-way width needed for the DZ Segment of the**
18 **DZTM Project?**

19 A. A 150-foot-wide right-of-way is the typical right-of-way width for 345 kV
20 transmission line and the minimum width required to construct and safely maintain the line for the
21 Proposed Route's length. ATXI witness Mr. Adam Molitor explains the reasons for selecting the
22 150-foot width further in his direct testimony.

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1 **Q. How many parcels of property, landowners, and acres will be affected along**
2 **the DZ Segment?**

3 A. The answer depends on whether the DZ Single Circuit Option or DZ Double Circuit
4 Option is approved. As reflected on Schedule MH-D5 (**Confidential**), approximately 386 parcels
5 of property will be affected along the DZ Segment if the DZ Double Circuit Option is approved,
6 and 329 parcels will be affected if the DZ Single Circuit Option is approved. Approximately 289
7 landowners would be affected on the DZ Segment if the DZ Double Circuit Option is approved,
8 and approximately 258 landowners if the DZ Single Circuit Option is approved. If the DZ Double
9 Circuit Option is approved, the DZ Segment will require approximately 1,928 total easement acres
10 of which approximately 619.0 acres will be greenfield easement; and if the DZ Single Circuit
11 option is approved, it will require approximately 1,851 total easement acres of which
12 approximately 1,839 acres will be greenfield easement. ATXI owns one parcel along this route
13 which will be the future Denny Substation site.

14 **Q. Will ATXI require additional land rights for the Denny Substation or the**
15 **Zachary Substation?**

16 A. No. The new Denny Substation is being constructed under Phase 1 to accommodate
17 the DZ Segment of the DZTM Project. ATXI has sufficient land rights for the modifications at the
18 Zachary Substation; and, as I understand it, the scope of work at that substation is all taking place
19 within the fence.

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1 **Q. Can you further explain the primary differences between the double circuit**
2 **option and the single circuit option for the DZ Segment with respect to property impacts?**

3 Compared to the DZ Single Circuit Option, the DZ Double Circuit option is approximately
4 5 miles longer (107 vs. 102), affects approximately 57 more parcels (386 vs. 329) and 31 more
5 landowners (289 vs. 258), requires approximately 77 more total easement area acres (1,928 vs.
6 1,851), and requires approximately 1,220 less new easement area acres² (619 vs. 1,839).³ The DZ
7 Double Circuit Option is a little longer and affects more parcels/owners than the DZ Single Circuit
8 Option primarily because it follows AECI's existing and planned lines for Sections C and D in
9 Figure 2 (which take a slightly longer route by running up to and down from AECI's Locust Creek
10 Substation), whereas Section E of the DZ Single Circuit Option does not travel up to and down
11 from the Locust Creek Substation. Conversely, the DZ Double Circuit Option requires
12 substantially less new easement area acres than the DZ Single Circuit Option because the new line
13 would be co-located on a single set of structures with AECI's line and overlap AECI's existing and
14 planned easement areas. To put this in percentage terms, the DZ Double Circuit Option would
15 require approximately 4.2% more total easement area acres, and approximately 66.3% less new
16 easement area acres, than the DZ Single Circuit Option.

17 In addition, as explained in the direct testimony of ATXI witnesses Mr. Molitor and Mr.
18 Rudis, the DZ Double Circuit Option would utilize a single set of steel monopole structures for

² 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.

³ The parcel and landowner counts are based on the parcels/owners for which a permanent easement or other permanent property interest would be obtained over all or any portion of the land.

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1 both ATXI's and AECI's lines, while the DZ Single Circuit Option would add steel monopoles for
2 ATXI's new line but would not eliminate or be structure matched with AECI's wood H frame
3 structures. ATXI witnesses Mr. Rudis and Mr. Molitor also explain that, under the DZ Double
4 Circuit Option, ATXI's and AECI's new lines for Sections D and F would be built together as part
5 of a single construction project, whereas under the DZ Single Circuit Option Section F would be
6 subject to separate construction projects by two different companies at two different times.
7 Similarly, they explain that less maintenance activity would be required for two lines on a single
8 set of structures (DZ Double Circuit Option) versus two separate lines (DZ Single Circuit Option).
9 As a result, from a property impact perspective, having a single construction project with the DZ
10 Double Circuit Option instead of two separate construction projects with the DZ Single Circuit
11 Option can be expected to have less impact on public roads, less soil compaction, and lower overall
12 amounts of construction equipment and activity. Similarly, the reduced level of maintenance
13 activity associated with the DZ Double Circuit Option would result in a corresponding reduction
14 to associated property impacts. Thus, the DZ Double Circuit Option, with a narrower footprint,
15 less total structures, and less/lower construction/maintenance impacts, would have less vegetation
16 clearing and is expected to have less impact on farming activities, farm production, and irrigation
17 pivots as well as reduce the potential of noxious weeds and crop loss in agricultural areas. Finally,
18 as discussed in the direct testimony of ATXI witness Ms. Leah Dettmers, as of October 23, 2024,
19 91.5% of the surveys received from the open houses and online submittal process prefer the Double
20 Circuit option.

1 **C. The ZM Segment**

2 **Q. What land rights are required for the ZM Segment of the DZTM Project?**

3 A. The ZM Segment will have approximately 59.6 miles of line. ATXI currently has
4 land rights in this area; however, ATXI will be obtaining new land rights on top of these existing
5 easement areas to accommodate this new circuit. The corridor for the ZM Segment will require a
6 150-foot easement which generally includes approximately 52 feet of new greenfield easement
7 and 98 feet of brownfield easement that would overlap ATXI's existing 345 kV line easement. The
8 new 52-foot easement would be to the south of the existing easement.

9 **Q. How many parcels of property, landowners, and acres will be affected along**
10 **the ZM Segments?**

11 A. Approximately 266 parcels of property will be affected along the ZM Segment, and
12 approximately 169 landowners. It will require approximately 1,090 total easement acres, of which
13 approximately 385.5 acres will be greenfield easement.

14 **Q. Will ATXI require additional land rights for the Zachary Substation or the**
15 **Maywood Substation?**

16 A. No. As previously noted, ATXI has sufficient land rights for the modifications at
17 the Zachary Substation and, as I understand it, the scope of work there is taking place within the
18 fence. Similarly, ATXI has sufficient land rights for the modifications at the Maywood Substation
19 and, as I understand it, the scope of work there is taking place within the fence as part of Phase 1
20 work for the Maywood-Mississippi River Crossing (MMRX) Project.

1 **D. The ZT Segment**

2 **Q. What land rights are required for the ZT Segment of the DZTM Project?**

3 A. The ZT Segment will have approximately 44.2 miles of line. Ameren Missouri
4 currently has land rights in this area; however, ATXI will be obtaining its own land rights on top
5 of these existing easement areas to accommodate this new circuit. The corridor for the ZT Segment
6 will require a 150-foot easement which includes approximately 50 feet of new greenfield easement
7 and 100 feet of brownfield easement that would overlap Ameren Missouri's existing line easement.
8 The new 50-foot easement would primarily be on the west side of the existing easement.

9 **Q. How many parcels of property, landowners, and acres will be affected along**
10 **the ZT Segments?**

11 A. As shown on Schedule MH-D5 (**Confidential**), approximately 222 parcels of
12 property will be affected along the ZT Segment, and approximately 152 landowners. It will require
13 approximately 800 total easement acres, of which approximately 267 acres will be greenfield
14 easement.

15 **Q. Will ATXI require additional land rights for the Zachary Substation or the**
16 **Thomas Hill Substation?**

17 A. No. As previously noted, ATXI has sufficient land rights for the modifications at
18 Zachary Substation, and, as I understand it, the scope of work there is taking place within the fence.
19 The Thomas Hill Substation is owned by AECI and AECI will be responsible for making those
20 modification and acquiring any additional land rights which are required.

1 **IV. LANDOWNER NOTICE AND LAND RIGHTS ACQUISITION PROCESS**

2 **Q. What is Schedule MH-D3 (Confidential)?**

3 A. Schedule MH-D3 (**Confidential**) is a list containing the name and address of each
4 owner of record of the land that is directly affected by the Phase 2 DZTM Project ATXI proposes
5 to construct, including owners impacted by the separate route options for the DZ Segment
6 identified as the DZ Single Circuit Option and the DZ Double Circuit Option, as disclosed by the
7 county assessors offices' records, as of not more than 60 days prior to the date notice of the
8 Application in this proceeding was provided to such landowners. It is my understanding that, under
9 Commission Rule 4240-20.045(6)(K)(1), "land is directly affected if a permanent easement or
10 other permanent property interest would be obtained over all or any portion of the land or if the
11 land contains a habitable structure that would be within three hundred (300) feet of the centerline
12 of an electric transmission line." The landowner list in Schedule MH-D3 (**Confidential**) includes
13 all landowners required by the Commission's Rule and also includes the names of all owners of
14 land within a minimum of 300 feet on each side of the centerline of the transmission lines (or a
15 600-foot wide notification corridor). For Sections D and F of the DZ Segment, from outside
16 AECI's Locust Creek Substation to ATXI's Zachary Substation (about 35 miles), Schedule MH-
17 D3 also includes landowners whose land is within a minimum of five hundred (500) feet on either
18 side of the centerline (or a 1,000-foot wide notification corridor). For the purposes of this
19 proceeding, ATXI has also included parcel numbers on the list, as many landowners own more
20 than one parcel along the Proposed Route. As explained in the direct testimony of ATXI witness
21 Ms. Leah Dettmers, the landowners listed in Schedule MH-D3 (**Confidential**) received notice of
22 ATXI's Application in this proceeding.

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1 **Q. Why did ATXI identify a wider corridor of affected landowners for Sections D**
2 **and F of the DZ Segment?**

3 A. Under the DZ Single Circuit Option, Section F of the DZ Segment will be routed
4 next to a planned AECI 161 kV transmission line corridor. Under the DZ Double Circuit Option,
5 Sections D and F of the DZ Segment will consist of new greenfield construction in a double circuit
6 configuration with a planned AECI 161 kV transmission line. Accordingly, ATXI's Proposed Route
7 for Sections D and F of the DZ Segment is based on AECI's current proposed route for its planned
8 line, and either follows or overlaps AECI's current proposed route for its planned line. It is my
9 understanding that AECI is subject to different regulatory requirements than ATXI and, as a result,
10 has already started negotiating easements with landowners along Sections D and F of the DZ
11 Segment for its proposed line, but has not finalized its proposed route. AECI has advised ATXI
12 that any changes to its current proposed route resulting from its ongoing negotiations with
13 landowners are likely to remain within five hundred (500) feet on either side of its current proposed
14 centerline. The wider corridor of affected landowners for Sections D and F of the DZ Segment is
15 intended to accommodate any changes to ATXI's Proposed Route that may be needed to account
16 for changes, if any, to AECI's proposed route.

17 **Q. Have the landowners listed on Schedule MH-D3 (Confidential) been**
18 **previously notified about the Phase 2 DZTM Project?**

19 A. Yes, ATXI mailed all landowners within the Study Area for the Phase 2 DZTM
20 Project postcard notices regarding the DZTM Project. All landowners listed on Schedule MH-D3
21 **(Confidential)** were within the Study Area. Additionally, the direct testimony of ATXI witness

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1 Ms. Dettmers explains that letters have been sent to all affected landowners pursuant to 20 CSR
2 4240-20.045(6)(K)(1).

3 **Q. Did ATXI invite these landowners to be involved in the siting of the Phase 2**
4 **DZTM Project's transmission lines?**

5 A. Yes, ATXI invited these landowners to participate in the public outreach and routing
6 processes through in-person open houses, a virtual open house, and a Program website, all of which
7 provided feedback opportunities for landowners, as explained by ATXI witness Ms. Dettmers.

8 **Q. Have potentially affected landowners been notified about right-of-way**
9 **easement acquisition?**

10 A. ATXI has not yet begun negotiating right-of-way easements for the Phase 2 DZTM
11 Project. For both the DZ Segment and the ZM Segment, ATXI intends to begin negotiations with
12 landowners once Commission approvals are received and the route is certain. For the ZT Segment,
13 ATXI intends to begin negotiations with landowners in 2025.

14 **Q. How will ATXI acquire the easement rights that it needs to construct the Phase**
15 **2 DZTM Project's transmission lines?**

16 A. When easement negotiations begin, Ameren Services Real Estate Department
17 representatives will contact the owners of the land from whom easement rights are needed to
18 construct the Phase 2 DZTM Project's transmission lines to negotiate purchase of the required
19 easements. Each landowner will be assigned to one land acquisition representative contact. These
20 representatives initially will contact the landowners in person, if possible.

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1 **Q. What information will be given to landowners at that time?**

2 A. The representatives will explain to the landowners the reason for the contact and
3 the purpose of the Phase 2 DZTM Project, and they will answer any questions the landowners
4 might have. In addition, the representatives will give the landowners at that initial meeting a
5 written statement of the purpose of the Phase 2 DZTM Project, a small-scale map and aerial
6 photography of the easement area needed, the acreage and length of the easement needed, and
7 information regarding the type and location of the facilities that will be constructed or moved
8 within the easement area, as appropriate. Landowners will also be provided a copy of a proposed
9 easement purchase agreement and/or the easement document.

10 **Q. Will Ameren Services personnel offer to purchase the easements at that initial**
11 **meeting?**

12 A. It will depend on whether the easement is in an area where there is existing Ameren
13 Missouri transmission infrastructure and, as such, Ameren Missouri presently holds an easement
14 there, or whether the easement is in an area not yet traversed by a transmission line. In the former,
15 “brownfield” case, generally yes, compensation will be offered and Ameren Services will explain
16 the basis of the offer. In the latter, “greenfield” case, the purpose of the initial meeting will be to
17 obtain survey permissions. Upon further survey and field studies, Ameren Services will begin
18 negotiations with greenfield landowners and explain the basis of the offer as explained above in a
19 similar fashion as the brownfield negotiations.

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1 **Q. How will the Ameren Services Real Estate Department determine the**
2 **compensation that it will offer to landowners to acquire easements for the Phase 2 DZTM**
3 **Project's transmission lines?**

4 A. Although the Ameren Services Real Estate Department has not yet determined
5 specifically what compensation it will offer for any particular easement needed to construct the
6 lines, the initial compensation offer will be based on valuation data provided by a third-party
7 independent licensed appraiser. Ameren Services intends to obtain an overall market study for each
8 county the Phase 2 DZTM Project traverses covering the route for the Project's transmission lines
9 that is approved by the Commission. The Ameren Services Real Estate Department will also
10 review any third-party appraisals or other objective valuation data that landowners provide it
11 during negotiations. In addition, Ameren Services representatives will be available to discuss the
12 easement purchase with each landowner, as needed.

13 **Q. Will ATXI need to pursue eminent domain to construct the Phase 2 DZTM**
14 **Project?**

15 A. It is ATXI's goal to obtain the land rights needed for the Phase 2 DZTM Project by
16 negotiation. However, if negotiations are not successful, ATXI may need to pursue condemnation.
17 The Ameren Services Real Estate Department will make all reasonable efforts to acquire the
18 necessary land rights by negotiation and will seek to exercise eminent domain only if it is
19 determined that land rights cannot reasonably be acquired through negotiation.

1 **V. POSSIBLE PROPERTY DAMAGE: MITIGATION AND REMEDIATION**

2 **Q. How will ATXI address damage to private property, if any, resulting from**
3 **construction related to the Phase 2 DZTM Project?**

4 A. The Ameren Services Real Estate Department is responsible for the restoration of,
5 or payment for, any damage to landowners' and tenants' property, including crops, caused by the
6 construction. Initially, pre-payment for damages may be offered to landowners at the time of
7 easement negotiations. Ameren Services personnel will also notify each landowner before
8 construction commences on their property. Then, upon completion of construction, Ameren
9 Services will assess the property for any damage not repaired or previously compensated for. The
10 Ameren Services Real Estate Department will also provide each landowner an Ameren Services
11 representative to contact to report damages, if any, and to work with towards mutually agreeable
12 remediation or compensation. Please refer to Schedule MH-D4 for ATXI's proposed Agricultural
13 Impact Mitigation Plan.

14 **Q. Will landowners be compensated for any property damage caused by future**
15 **maintenance of the Phase 2 DZTM Project's transmission lines by ATXI?**

16 A. The standard language in the easement that the Ameren Services Real Estate
17 Department uses provides that the transmission facilities' owner shall be responsible for actual
18 damages occurring on the easement area as a result of the construction, operation, maintenance, or
19 repair of the subject facilities, and shall, at its discretion, either repair and restore or reimburse the
20 owner for such loss or damages.

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

AFFIDAVIT

1. My name is Matt Hoven. I am a Real Estate Specialist in the Real Estate Department for Ameren Services Company, which is a subsidiary of Ameren Corporation and an affiliate 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/ Matt Hoven
Matt Hoven
Real Estate Specialist, Real Estate
Department, for Ameren Services Company

On behalf of Ameren Transmission
Company of Illinois

Date: December 11, 2024