

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

In the Matter of the Application of Ameren	)	
Transmission Company of Illinois for a	)	
Certificate of Convenience and Necessity	)	No. EA-2025-0087
Under Section 393.170, RSMo relating to	)	
Transmission Investments in North Central	)	
Missouri	)	

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

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

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

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

3. As a functioning RTO, MISO is the sole provider of transmission service for those entities such as Ameren Transmission Company of Illinois (“ATXI”), that have transferred functional control of their transmission assets to MISO. As the transmission

service provider, MISO has a responsibility for the planning and operation of the regional transmission grid, including the development of projects like the Denny – Zachary – Thomas Hill – Maywood (“DZTM”) Project proposed by ATXI in its Application. The DZTM Project is one of the projects approved by MISO as part of its regional portfolio of Multi Value Projects, also known as Long-Range Transmission Planning (“LRTP”) Tranche 1, that are intended to enhance the regional transmission system.

4. Based on the foregoing, MISO has an interest in the Application and in this proceeding that is different from that of the general public and from the other parties to this matter. MISO’s participation in this docket will bring forth information about attributes of the project under consideration that will assist the Commission in its decision-making. MISO supports completion of projects in the LRTP Tranche 1 portfolio, which includes the DZTM Project that is the subject of ATXI’s Application.

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

5. This Commission received earlier applications from ATXI in File Nos. EA-2015-0146 and EA-2017-0345 regarding the Mark Twain MVP project (two applications describing projects having essentially the same electrical characteristics), and received direct testimony from a MISO witness in each case in support of the applications. In File No. EA-2017-0345, the MISO direct testimony was submitted early in the proceeding such that other parties received early access to information that the MISO witness could provide.

6. The Commission received an earlier application from ATXI in File No. EA-2024-0302 regarding other Tranche 1 projects, a pending case in which MISO is participating regarding the need for the transmission upgrades.

7. Considering the foregoing, MISO respectfully submits that the Commission should have important information in the form of direct testimony from a MISO-sponsored witness, even though MISO is not the applicant in the case. The Commission staff, the Office of the Public Counsel, and other interested parties will also be served by having early access to the information provided in the MISO testimony in order to assist in the preparation of their positions.

8. Accordingly, and pursuant to 20 CSR 4240-2.015 (“Waiver of Rules”), there is good cause for the Commission to waive 20 CSR 4240-2.130 (“Evidence”), subpart (7), to the extent necessary to permit MISO to present early-filed, direct testimony in support of the Application, which will promote administrative efficiency and expedite these proceedings.

WHEREFORE, the relief sought by MISO, for good cause shown, is permission from the Commission to submit the attached Direct Testimony of Jeremiah Doner as early-filed, direct testimony in the above captioned case.

Respectfully submitted,

**/s/ William D. Steinmeier**

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Attorneys for Midcontinent Independent  
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**Certificate of Service**

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 12th day of December 2024 to the persons on the Commission's service list in this case.

**/s/ William D. Steinmeier**  
Attorney for Midcontinent Independent System  
Operator, Inc.