

**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)

Case No. EA-2025-0087

MOTION TO INTERVENE OF CLEAN GRID ALLIANCE

Clean Grid Alliance, by its counsel, hereby petitions the Public Service Commission of the State of Missouri (“PSC” or “Commission”) for an order permitting Clean Grid Alliance to intervene in this proceeding under 20 CSR 4240-2.075 as an interested entity. In support of this Motion to Intervene, Clean Grid Alliance states and alleges the following:

1. Clean Grid Alliance is a not-for-profit corporation organized and existing under the laws of the State of Minnesota. Clean Grid Alliance is a collaborative organization dedicated to renewable energy’s fair access to the electric transmission system and market throughout the Midwest. Clean Grid Alliance’s Board of Directors and members are comprised of wind, solar, and battery storage developers, environmental organizations, wind and solar energy experts, clean energy advocates, and businesses providing goods and services to the renewable energy industry in Missouri and across the country. Members of Clean Grid Alliance operate

and are seeking to build and interconnect wind, solar, and energy storage facilities in Missouri and MISO.

2. Clean Grid Alliance's office is located at 570 Asbury Street, Suite 201, St. Paul, MN 55104, with a phone number of 651-644-3400. Notice and mailings may be sent or electronically mailed to:

Elizabeth A. Wheeler (WI State Bar #1056625)
Senior Counsel, Director of Regulatory Advocacy
Clean Grid Alliance
570 Asbury Street, Suite 201
St. Paul, MN 55104

Telephone: 651-644-3400
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and

Judith Anne Willis (MO Bar# 63327)
The Law Office of Judith Anne Willis
P.O. Box 106088
Jefferson City, MO 65110

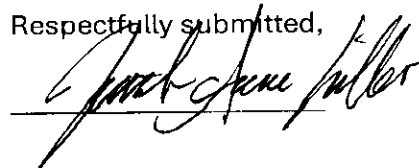
Telephone: 573-301-8082
Email: jaw@anniewillislaw.com

3. This motion is brought within the deadline to seek intervention established in the *Order Directing Notice, Setting Intervention Deadline, and Setting Time For Responses* in this proceeding that was issued on December 13, 2024.
4. Clean Grid Alliance and its members will be directly impacted by the issuance or denial of the certificate of convenience and necessity requested by Ameren Transmission Company of Illinois (ATXI) in this proceeding. The proposed project will provide transmission capacity required to increase region-wide renewable energy

penetration while increasing system reliability and avoiding thermal overload. The transmission lines proposed in this proceeding are required for Clean Grid Alliance's members to build and interconnect planned wind, solar, and storage facilities in Missouri and within the larger MISO footprint. Thus, Clean Grid Alliance's interests may be adversely affected by a final order arising from this case.

5. Clean Grid Alliance generally supports ATXI's request for a Certificate of Convenience and Necessity in this proceeding. Clean Grid Alliance reserves the right to take a position on specific issues as this case proceeds.
6. No other party or entity interested in this proceeding can adequately represent the interests of the Clean Grid Alliance because its interests differ from those of the general public and other intervenors.
7. Clean Grid Alliance has previously been granted intervention in the following cases at the Missouri Public Service Commission: EA-2014-0207, EA-2016-0358, EA-2017-0345, ET-2018-0063, EA-2023-0017, EA2024-0020, EO-2021-0021, EO-2018-0038, and EA-2024-0302.
8. Clean Grid Alliance's intervention will serve the public interest by assisting the development of a full and complete record for the Commission's decision in this case. Wherefore, Clean Grid Alliance seeks an order granting intervention and the opportunity to provide additional information that will serve the public interest.

Respectfully submitted,



Jack Anne Fuller

Judith Anne Willis (MO Bar # 63327)

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Attorney for Clean Grid Alliance

CERTIFICATE OF SERVICE

The undersigned certifies that this Motion was electronically served upon all parties to this case on January 10, 2025.

A handwritten signature in black ink, appearing to read "Judith Anne Willis", written over a horizontal line.

Judith Anne Willis
Attorney for Clean grid Alliance