

**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.)

**RESPONSE OF AMEREN TRANSMISSION COMPANY OF ILLINOIS
TO MISO’S MOTION TO SUBMIT DIRECT TESTIMONY**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and for its response to the Motion of Midcontinent Independent System Operator, Inc. (MISO) to Submit Direct Testimony in Support of the Application, states as follows:

1. On December 11, 2024, ATXI filed an application with the Commission seeking an order granting a Certificate of Convenience and Necessity (CCN) pursuant to Section 393.170.1, RSMo. The CCN would authorize ATXI to construct, install, own, operate, control, manage, and maintain slightly over 200 miles of new 345 kV transmission circuits across the State of Missouri – referred to as the Denny-Zachary-Thomas Hill-Maywood Project, or DZTM Project. The DZTM Project constitutes 1 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). Application, pp. 1-2.

2. In support of its case-in-chief, ATXI filed the direct testimony of 9 witnesses. The Application and direct testimony of ATXI witness Mr. Shawn Schukar summarize ATXI’s testimony, and also summarizes and includes references to testimony to be submitted by Jeremiah Doner, Director of Cost Allocation and Competitive Transmission, MISO. Mr. Schukar’s testimony and the Application state:

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

(Schukar Direct, p. 10, fn. 3; Application, p. 11, fn. 2).

3. Consistent with these statements in ATXI's testimony and Application, on December 12, 2024, MISO filed an application to intervene as well as its Motion to Submit Direct Testimony in Support of the Application and Attached Direct Testimony of Jeremiah Doner (MISO's Motion).

4. ATXI supports MISO's Motion seeking leave to file direct testimony in support of the Application. MISO's Motion states "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." MISO's Motion, p. 3. ATXI concurs with and supports this statement.

5. ATXI and MISO have been transparent and timely in alerting the Commission, Staff, and all parties of their intent to submit the direct testimony of MISO in support of the Application. This proceeding is unique in that the DZTM Project which is the subject of ATXI's CCN request was developed through MISO's LRTP process. While the Company has submitted the testimony of multiple witnesses demonstrating how the DZTM Project satisfies the factors considered for approval of a CCN identified in *In re Tartan Energy Co., Report and Order*, Case No. GA-94-127, 1994 WL 762882 (Sept. 16, 1994), including supporting the need for, the reliability and economic benefits provided by, and economic feasibility of the DZTM Project, the

proposed direct testimony of MISO witness Mr. Doner provides additional background, context, and support regarding how the Project satisfies the *Tartan* factors.

6. Rather than causing potential harm or prejudice to any party, granting MISO's Motion and allowing it to file its proposed direct testimony will provide transparency, support development of a robust record for the Commission, and help avoid rather than cause potential harm to other parties by providing this important information supporting the Application up front so that Staff and all parties will have the opportunity to consider that information in providing their recommendations and/or testimony.

7. MISO also correctly notes that the relief it seeks here has been granted in other proceedings presenting similar facts. MISO's Motion, p. 2; *see In the Matter of the Application of Ameren Transmission Company of Illinois for a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345-kV Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri*, File No. EA-2017-0345, Transcript Volume 1 (Prehearing Conference – Jefferson City, MO – October 25, 2017), pp. 8-9 (November 6, 2017) (Granting MISO's motion to file direct testimony), and Order (December 8, 2017) (Granting Wind on the Wires Motion to File Direct testimony).

WHEREFORE, ATXI requests that the Commission grant MISO's Motion to submit direct testimony in this proceeding.

Dated: January 20, 2025

Respectfully submitted,

AMEREN TRANSMISSION COMPANY OF ILLINOIS

By: /s/ Carmen L. Fosco

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was served via electronic mail (e-mail) on the certified service list maintained by the Missouri Public Service Commission on its Electronic Filing Information System in this case on January 20, 2025.

/s/ Carmen L. Fosco _____

Carmen L. Fosco