

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

A Working Case to Investigate Plans)
to Build Electric Transmission in) File No. EW-2012-0369
Ameren Missouri's Service Territory)

STAFF REPORT

COMES NOW the Staff of the Missouri Public Service Commission (“Staff”), by and through the Staff Counsel’s Office and files this Staff Report. By Order of the Commission this Staff Report was due on Sunday, February 17, 2013, but on Friday, February 15, 2013, the Staff filed the Staff Request For Leave To File Staff Report On February 19, 2013. For this Staff Report, the Staff states as follows:

1. On November 1, 2010, Union Electric Company, d/b/a Ameren Missouri (“Ameren Missouri”) filed with the Commission a Verified Application To Extend Permission And Authority For Participation In Regional Transmission Organization establishing File No. EO-2011-0128 (In the Matter of the Application of Union Electric Company for Authority to Continue The Transfer of Functional Control of Its Transmission System to the Midwest Independent Transmission System Operator, Inc.). On November 17, 2011, the Staff, Ameren Missouri, Midwest Independent Transmission System Operator, Inc. (“MISO”), and Missouri Industrial Energy Consumers, Inc. (“MIEC”) filed with the Commission a Non-unanimous Stipulation And Agreement in File No. EO-2011-0128 in which Ameren Missouri and Ameren Transmission Company agreed to participate in an investigatory docket as follows:

B. Stipulations, 10. Terms of Continued Participation

i. Investigatory docket. Ameren Missouri and Ameren Transmission Company (“ATX”) (collectively, for purposes of this subparagraph i, "Ameren") agree to participate in an investigatory docket to be initiated by the MoPSC within 60 days after the effective date of the MoPSC’s order approving this 2011 Stipulation. The purpose of such investigatory docket shall be to investigate plans

during the next 10 years for Ameren or another Ameren affiliate to build transmission in Ameren Missouri's service territory. An "affiliate" for purposes of this subparagraph shall be defined according to the definition of "affiliated entity" in the MoPSC's Affiliate Transaction Rule applicable to electric utilities. Ameren agrees not to object to discovery requests relating to plans during the next 10 years for Ameren or another Ameren affiliate to build transmission in Ameren Missouri's service territory on the grounds that: (a) the discovery does not seek information that is relevant to such transmission issues; or (b) the data request seeks information that is not in Ameren's possession if the information is in the possession of an Ameren affiliate. By agreeing to participate in the docket Ameren is not waiving any applicable privilege and reserves the right to object if a discovery request asks for opinions (not facts or existing data), asks for legal conclusions, asks Ameren to perform analyses that do not already exist, or is vague, unduly burdensome, or overly broad. Ameren's agreement to participate in said investigatory docket is conditioned upon the investigatory docket being closed no later than 10 months after the MoPSC initiates it. Neither ATX nor any Ameren affiliate who provides information in connection with the investigatory docket shall be deemed to have conceded that the MoPSC has jurisdiction over them, or could otherwise compel them to participate in the investigatory docket or to provide such information, absent the agreement to do so reflected in this subparagraph i.

2. On November 18, 2011 the Office of the Public Counsel ("Public Counsel") filed its *Motion To Continue Hearing And Request For Expedited Treatment* and on that same date the Commission issued an *Order Granting Public Counsel's Motion To Continue Hearing* from November 21-22, 2011. On November 23, 2011, Public Counsel and the Missouri Joint Municipal Electric Utility Commission ("MJMEUC") filed Objections to the Non-unanimous Stipulation And Agreement. The evidentiary hearing was reset for February 9-10, 2012, and was held on February 9-10, 2012. The parties filed initial and reply briefs.

3. The Commission issued a Report And Order in File No. EO-2011-0128 on April 19, 2012, in which it found that Ameren Missouri's continued participation in the Midwest ISO through May 31, 2016, is in the public interest, subject to various conditions set out in Ordered Paragraph 2. On April 27, 2012, Ameren Missouri filed a Motion For Clarification Of Report And Order, and on May 17, 2012, the Commission issued an Order Granting Ameren

Missouri's Motion to Clarify Report And Order in which it withdrew and replaced Ordered Paragraph 2 of the Report And Order.¹ Although Subparagraph 2.R. was part of the replacement the Commission directed, there was no change in the language of Ordered Subparagraph 2.R. "New" Ordered Subparagraph 2.R. paraphrases the November 17, 2011, Non-unanimous Stipulation And Agreement section B. Stipulations, 10. Terms of Continued Participation, i. Investigatory docket, that appears above starting at the bottom of page 1 and continuing onto the first half of page two. Ordered Subparagraph 2.R. directs an investigation of the plans during the next 10 years for Ameren or another Ameren affiliate to build transmission in Ameren Missouri's service territory.

4. On May 17, 2012, the Commission issued in File No. EW-2012-0369 an Order Opening An Investigation Into Plans For Construction Of Electric Transmission Within Ameren Missouri's Service Territory. The Commission directed the Staff to lead a working group to investigate plans during the next ten years for Ameren Missouri, or another Ameren affiliate to build transmission in Ameren Missouri's service territory, and file a Report no later than

¹ Although Subparagraph 2.S. was part of the replacement the Commission directed, there was no change in the language of Ordered Subparagraph 2.S. "New" Ordered Subparagraph 2.S. states:

S. For transmission facilities located in Ameren Missouri's certificated service territory that are constructed by an Ameren affiliate that are subject to regional cost allocation by the Midwest ISO, for ratemaking purposes in Missouri, the costs allocated to Ameren Missouri by the Midwest ISO shall be adjusted by an amount equal to the difference between: (1) the annual revenue requirement for such facilities that would have resulted if Ameren Missouri's Commission-authorized ROE and capital structure had been applied and there had been no CWIP (if applicable), or other FERC Transmission Rate Incentives, including Abandoned Plant Recovery, recovery on a current basis instead of capitalizing pre-commercial operations expenses and accelerated depreciation, applied to such facilities and (ii) the annual FERC-authorized revenue requirement for such facilities. The ratemaking treatment established in this provision will, unless otherwise agreed or ordered, end with the Commission's next order regarding Ameren Missouri's participation in the Midwest ISO, another RTO, or operation as an ICT. (from paragraph 10j. of the stipulation and agreement)

February 17, 2013. In the intervening time, the Staff spoke with Public Counsel, MIEC, and MJMEUC.

5. On August 8, 2012, Ameren Transmission Company of Illinois (“ATXI”) filed a Petition for Declaratory Judgment in Cole County Circuit Court for the purpose of determining questions of actual controversy involving the jurisdiction of the Commission over ATXI, a wholly-owned electric transmission company and subsidiary of Ameren Corporation (“Ameren”), that will construct, own, and operate transmission lines used by others to transmit electricity in Missouri. ATXI is a corporation organized under the laws of Illinois with its principal office at 1901 Chouteau Avenue, St. Louis, Missouri.² On October 5, 2012, ATXI filed its Motion For Leave To File First Amended Petition For Declaratory Judgment and its First Amended Petition For Declaratory Judgment. Paragraph 9 of the First Amended Petition For Declaratory Judgment states that in 2011 the Midwest Independent Transmission System Operator, Inc.’s (“MISO’s”) Board approved the MISO Transmission Expansion Plan (MTEP11)

² ATXI is a “transco.” In Federal Energy Regulatory Commission (“FERC”) Order No. 679, the FERC defines transco to mean “a stand-alone transmission company that has been approved by the Commission and that sells transmission services at wholesale and/or on an unbundled retail basis.” [Paragraph 201].

The FERC issued its Order No. 679, Promoting Transmission Investment Through Pricing Reform on July 20, 2006, as a Final Rule in Docket No. RM06-4-000, 116 FERC ¶61,057. In paragraph 1 of its Final Rule, the FERC stated that pursuant to the directives in Section 1241 of the Energy Policy Act of 2005, which added new Section 219 of the Federal Power Act (“FPA”), 16 USC §824s, the FERC was providing in the Final Rule incentives for transmission infrastructure investment that would help insure the reliability of the bulk power system and reduce the cost of delivered power to customers by reducing transmission congestion.

As the Commission is well aware, the incentives of FERC Order No. 679 are not limited to rate of return but include other ratemaking mechanisms. The following paragraphs of FERC Order No. 679 address the following ratemaking mechanisms available to public utilities, including transcos: paragraph 85 - Return on Equity (“ROE”); paragraph 103 - Construction Work in Progress (“CWIP”) and Pre-Commercial Expenses; paragraph 123 - Hypothetical Capital Structure; paragraph 135 - Accelerated Depreciation; paragraph 155 - Recovery of Costs of Abandoned Facilities; paragraph 168 - Deferred Cost Recovery; paragraph 179 - Single-Issue Ratemaking. There are also paragraphs addressing incentives available solely to transcos: paragraph 206 - ROE Incentive; paragraph 242 - Accumulated Deferred Income Taxes (“ADIT”); and paragraph 251 - Acquisition Premiums for Transco Formation.

for certain Multi-Value Projects (“MVPs”). Paragraph 10 of the First Amended Petition For Declaratory Judgment relates that the MVPs approved by MISO’s Board in the MTEP11 include two multi-state projects of which ATXI will construct both the Missouri and Illinois portions. ATXI refers to the projects as the Illinois Rivers Project and the Mark Twain Project, both in Northeast Missouri. The Mark Twain Project will connect to the Illinois River Project at a substation located near Palmyra. According to Paragraph 14 of the First Amended Petition For Declaratory Judgment, the Missouri portion of the Mark Twain Project will run from Palmyra to a substation near Adair, Missouri to the Iowa border. Paragraph 13 of the First Amended Petition For Declaratory Judgment states that the Illinois Rivers Project is scheduled to be in service in segments beginning in 2016 and completed by June 1, 2019, and Paragraph 15 relates that the Mark Twain Project is scheduled to be in service not later than June 1, 2020.

6. The federal right of first refusal (“ROFR”) was in effect for the MVPs to be built in Missouri that were approved by the MISO Board in December 2011 for MTEP11. ROFR is the right of incumbent transmission owner to build transmission projects interconnected to its existing system. In his Surrebuttal Testimony in File No. EO-2011-0128, Staff witness Adam McKinnie explained that prior to Federal Energy Regulatory Commission (“FERC”) Order No. 1000, the definition of “owner”³ in the MISO Transmission Owners Agreement determines which entity has the right of first refusal to construct transmission. The term “owner,” as defined in the Midwest ISO TOA gives the “owner” and other transmission owning members of a particular holding company system the right and obligation to build transmission interconnecting to the existing holding company system. (Ex. 10, McKinnie Sur., p. 2, ln. 55 - p. 3, ln. 36; p. 6,

³ Article One Definitions, Section I, P. Owner. Version: 0.0.0 Effective: 7/31/2010 and APPENDIX B PLANNING FRAMEWORK. Version: 0:0:0 Effective: 7/31/2010. VI. Development of the Midwest ISO Transmission Plan.

Ins. 8-12). Ms. Maureen Borkowski explained in her Surrebuttal Testimony in File No. EO-2011-0128 under the Midwest ISO TOA, each of the Ameren transmission-owning companies, Ameren Missouri, Ameren Transmission Company of Illinois (“ATXI”), and Ameren Illinois Company (“AIC”), have the right and obligation to build a transmission project that connects to the Ameren combined system. (Ex. 5, Borkowski Sur., p. 8, ln. 21 - p. 9, ln. 2). Thus, whereas in File No. EO-2012-0367 Kansas City Power & Light Company (“KCPL”) and KCP&L Greater Missouri Operations Company (“GMO”) requested that the Commission find that no approval is required under Missouri law to novate the Notifications To Construct (“NTCs”) received from the Southwest Power Pool, Inc. (“SPP”) regarding the Iatan-Nashua 345-kV Transmission Project and the Sibley-Nebraska City Transmission Project or otherwise express no objection to or approve KCPL’s and GMO’s plans, presumably Ameren Missouri, ATXI, AIC, ATX, Ameren Services Company, Ameren or whichever Ameren entity would be authorized would assert that the applicable MISO documents do not require Ameren Missouri to seek Commission authorization pursuant to Section 393.190.1 RSMo. 2000 to transfer, assign, or otherwise dispose of any ROFR which is an asset.

7. In part in its Data Request No. 1 in File No. EW-2012-0369 to Ameren Missouri the Staff asked for a current list of all transmission projects approved, planned, or contemplated to be installed within Ameren Missouri's service territory by Ameren Missouri, an Ameren affiliate, or possibly a non-affiliated transmission company over the next ten years, and the Staff asked in its Data Request No. 4 in File No. EW-2012-0369 to Ameren Missouri to indicate the anticipated entity that will or is expected/contemplated to construct and/or own the facilities that will be newly constructed/upgraded/replaced within the Ameren Missouri service territory or

elsewhere in Missouri. The response that the Staff received to Staff Data Request No. 4 states as follows:

Ameren Transmission Company of Illinois intends to construct the Mark Twain project and the short Missouri section of the Illinois Rivers project. Ameren Missouri will build all other projects identified in the budget-forecast tab of the spreadsheet provided in in [sic] response to question #1.

For other MISO contemplated projects (identified on tab 2 of the spreadsheet) Ameren Missouri would be expected to construct local reliability projects, while Ameren Transmission Company of Illinois would be expected to build large, regional projects such as MVPs and MEPs [Market Efficiency Projects].

8. Transmission projects in the MTEP are categorized by MISO pursuant to the following criteria for purposes of assigning cost responsibility and the resulting transmission service charges:

- A. Reliability Needs
 - 1) Baseline Reliability Projects
 - 2) New Transmission Access Projects
 - a) Generation Interconnection Projects
 - b) Transmission Delivery Service Projects
- B. Market Efficiency Projects (MEP)
- C. Multi-Value Projects (MVP)

(Ameren Missouri Response to Staff Data Request No. 3, File No. EW-2012-0369).

MVP and MEP projects have cost allocation shared regionally. In File No. EO-2011-0128, Ms. Borkowski related in her Surrebuttal Testimony, at page 6, lines 5-16, that Ameren Missouri intends to build projects MISO designates as Baseline Reliability, Generation Interconnection, and Transmission Delivery Service if the generation or transmission customer for whom the project is constructed is Ameren Missouri.

9. Ms. Borkowski testified in File No. EO-2011-0128 that ATX's construction of transmission in Missouri during the proposed period of Ameren Missouri's continued MISO

participation to May 31, 2016 would not render Ameren Missouri's continued Midwest ISO participation detrimental to the public interest from a purely "dollars and cents" perspective. She stated that the only relevant project is the Mark Twain Project, a 345-kV transmission line MVP extending from the Iowa border north of Kirksville and then south and east to Associated Electric Cooperative, Inc.'s ("AECI's") Palmyra substation. MTEP11 has this project in-service in 2020. Although ATX's projected cost to build this line is \$200 million, Ms. Borkowski testified that the amount forecasted or budgeted to be spent by 2016 on the line by ATX is approximately \$11 million. She noted regarding MVPs that Ameren Missouri is allocated 10% or less of the cost of the project. She said that assuming there is an incremental impact of ATX building the line rather than Ameren Missouri building the line (using the assumptions similar to those used by MIEC witness Mr. James R. Dauphinais in his analysis in his Rebuttal Testimony (Ex. 14 in File No. EO-2011-0128)), the net present value of the incremental impact to Ameren Missouri's customers over the 40-year life of the line of ATX building the line would be approximately \$1.6 million. (Ex. 6, Borkowski Supp. Sur., p. 2, ln. 7 - p. 3, ln. 21; Ex. 5, Borkowski Sur., p. 6, lns. 16-18).

10. The Staff noted in its Reply Brief in File No. EO-2011-0128 that in FERC Docket No. EL 10-80-000 Ameren Services Company ("Ameren Services") received authorization to use various transmission infrastructure investment incentives (and other ratemaking proposals) for its affiliates, including ATX, in connection with two of four new transmission projects in the first phase of a portfolio of projects called "Grand Rivers." (Ex. 13, Kind Sup. Reb., p. 11, lns. 18-23; FERC Docket No. EL 10-80-000, May 19, 2011, Order On Transmission Rate Incentives, 135 FERC ¶ 61,142). This Commission filed a Notice of Intervention in said FERC case. MIEC filed a Motion to Intervene, and MJMEUC filed a late motion to intervene and protest, and a

motion to accept the late-filed intervention and protest. FERC's May 19, 2011 authorization was conditioned on the two projects obtaining approval in the Midwest ISO Transmission Expansion Planning ("MTEP") process. In its May 19, 2011, Order On Transmission Rate Incentives in Docket No. EL 10-80-000, the FERC identified the two conditionally approved projects as the Illinois Rivers Project and the Big Muddy River Project and the two projects for which the requested rate incentives were denied, without prejudice, as the Spoon River Project and the Wabash River Project.

On July 6, 2012 in FERC Docket No. ER12-2216-000 Ameren Services Company made a filing on behalf of its affiliates AIC and ATXI, and with MISO requested authorization and submitted revisions to MISO's Open Access Transmission, Energy, and Operating Reserve Markets Tariff to:

(A) provide transmission rate incentives pursuant to Order No. 679 in connection with the Spoon River and Mark Twain transmission projects (the "Projects"). The rate incentives requested are 100% recovery of construction work in progress ("100% CWIP Recovery), and (b) recovery of abandoned plant costs ("Abandoned Plant Recovery"). Ameren Services also requests authorization for ATXI to use a hypothetical capital structure while the Projects are being constructed, and for authorization to assign the requested incentives to any Ameren entity that undertakes the development and construction of the projects, including the Ameren Companies and their successors and assigns. As Ameren Services will explain below, both Projects have been approved as Multi Value Projects ("MVPs") in the MISO Transmission Expansion Plan ("MTEP") and granting these two transmission rate incentives is fully consistent with Commission policy; and

(B) amend Tariff Attachment O-AIC in order to transition AIC from a transmission revenue requirement calculated on an historic basis to one that is forward looking, on the same terms and conditions that the Commission previously has accepted for other MISO Transmission Owners, including ATXI, and to make the necessary Tariff revisions to implement the requested rate incentives.

(July 6, 2012, Filing Letter, p. 1; Footnote omitted). On November 14, 2012, the FERC issued in FERC Docket No. ER12-2216-000, Order On Transmission Rate Incentives And Formula Rate Proposal, 141 FERC ¶ 61,121, in which the FERC granted Ameren Services Company's request for (1) transmission rate incentives, (2) authority to assign such incentives to any Ameren Services Company affiliate that undertakes the Projects, and (3) approval of Ameren Services Company's revised Attachment O-AIC and GG.

11. An example of the Reliability Needs Projects that Ameren Missouri intends to construct is the filing it made at this Commission on December 6, 2012, which established File No. EA-2013-0089. Ameren Missouri, pursuant to Section 393.170 RSMo. 2000, filed for permission and approval of an Application for a line certificate of convenience and necessity ("CCN") authorizing it to construct, install, own, operate, maintain and otherwise control and manage 6-miles of a 12-mile a 345,000-volt electric transmission line not within Ameren Missouri's existing certificated service territory in Cape Girardeau County, Missouri. (Introductory paragraph and Paragraph 5 of Application in File No. EA-2013-0089.)

Ameren Missouri states in its Application in File No. EA-2013-0089 that the project is required to meet Ameren Missouri's transmission needs; it is part of a regional transmission plan approved by MISO; and under certain circumstances will prevent voltage collapse that could result in an outage of load in the Cape Girardeau area, and under North American Electric Reliability Corporation ("NERC") Category C contingency events Ameren Missouri is required to take action to correct. (Paragraph 6 of Application in File No. EA-2013-0089.)

12. On August 31, 2012, Transource Missouri, LLC filed an Application and Direct Testimony for a line certificate of convenience and necessity authorizing it to construct, finance,

own, operate, and maintain the Iatan-Nashua and Sibley-Nebraska City 345-kV electric transmission projects that established File No. EA-2013-0098. Also on August 31, 2012, KCPL and GMO filed an Application and Direct Testimony for approval to transfer certain transmission property to Transource Missouri, LLC and for other related determinations. Interventions were granted, the cases were ordered consolidated, a full procedural schedule was set, and evidentiary hearings are scheduled for the first week of April 2013. The same Staff members who have been working on File Nos. EA-2013-0098 and EO-2012-0367 are assigned to File No. EW-2012-0369.

13. On January 14, 2013, the parties to File Nos. EO-2012-0135 (In the Matter of the Application of Kansas City Power & Light Company for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.) and EO-2012-0136 (In the Matter of the Application of KCP&L Greater Missouri Operations Company for Authority to Extend the Transfer of Functional Control of Certain Transmission Assets to the Southwest Power Pool, Inc.) jointly proposed consolidation and a full procedural schedule. The cases were ordered consolidated and evidentiary hearings are scheduled for the first week of June 2013. Rebuttal testimony is due to be filed in these cases on March 4, 2013. The same Staff members who have been working on File Nos. EA-2013-0098 and EO-2012-0367 are assigned to File Nos. EO-2012-0135 and EO-2012-0136.

14. The Staff assigned to File No. EW-2012-0369 have also worked in various capacities on the recent Ameren Missouri rate increase case, File No. ER-2012-0166, the KCPL and GMO rate increase cases, File Nos. ER-2012-0174 and ER-2012-0175, respectively, and The Empire District Electric Company rate increase case, File No. ER-2012-0345. Certain of these Staff members are now working on the Laclede Gas Company rate increase case, File No. GR-

2013-0171, and the Laclede Gas Company acquisition of Missouri Gas Energy case, File No. GM-2013-0254. The Staff has placed its time and effort in these cases and the Transource Missouri cases, File Nos. EA-2013-0098 and EO-2012-0367, and the KCPL-SPP and GMO-SPP cases, File Nos. EO-2012-0135 and EO-2012-0136. Also, Commission technical Staff that was at one time available to work as part of the Staff in cases before the Commission, now assists the Commissioners in their work and, therefore, are no longer available to work as part of the Staff in these cases.

The Staff does not seek to indicate that File No. EW-2012-0369 is not a significant proceeding, but as an “EW” case it is not a case a utility or some other entity initiated that requires Commission action by a certain statutory or other time sensitive date. Arguably, the investigation that otherwise might have occurred regarding ATX and ATXI is instead occurring regarding Transource and Transource Missouri in File Nos. EA-2013-0098 and EO-2012-0367, cases which were not anticipated at the time of the November 17, 2011 Non-unanimous Stipulation And Agreement in File No. EO-2011-0128. One clear difference between Transource / Transource Missouri and ATX / ATXI is that Transource / Transource Missouri are not ultimately wholly owned by one entity as are ATX / ATXI, Ameren transmission company entities.

15. In the Non-unanimous Stipulation And Agreement filed with the Commission on November 17, 2011, in File No. EO-2011-0128, Ameren Missouri, a signatory party, and ATX agreed to a 10 month investigation, as did the Staff, MIEC, and MISO, the other signatory parties. By Public Counsel and MJMEUC objecting to the Non-unanimous Stipulation And Agreement, pursuant to Commission Rule 4 CSR 240-2.115(2)(D) Stipulations and Agreements, it became “merely a position of the signatory parties to the stipulated position, except that no

party shall be bound by it. All issues shall remain for determination.” In its Report And Order in File No. EO-2011-0128, the Commission ordered the investigation occur within the context of the 10 month time frame set out in the November 17, 2011 Non-unanimous Stipulation And Agreement.

Now that February 17, 2013 has been reached and the Staff has filed a Report, the question arises as to what the Commission does now? Public Counsel and Staff have just in the last few days submitted some additional data requests, responses to which are due before the 10 month investigation period ends in March 2013. Thus, there is just under one month left of the 10 months of the investigation; what, if anything, occurs after the 10 months end? Does the Commission close this EW-2012-0369 file or does it keep this file open for further activity?

There are various issues raised by the First Amended Petition For Declaratory Judgment now pending in Cole County Circuit Court that the Commission may not want to or be able to address at the same time in a proceeding before the Commission. However, there is a separate and distinct statutory provision by which the Commission now has jurisdiction over ATXI, as it is now engaged in the construction or the process of construction of a transmission line or lines - Section 386.310.1 RSMo. 2000, which gives the Commission safety jurisdiction over any such line or lines. (Regarding the reporting of certain safety matters, the third sentence of Section 393.140(9) RSMo. 2000 and 4 CSR 240-3.190(3), (4), (5), and (6) are also relevant.) As a consequence, the Commission may desire to keep this EW-2012-0369 file open or establish a new file to direct and receive the filing of quarterly reports by ATXI addressing the progress of the planning, design, and construction of the Mark Twain and Illinois Rivers transmission lines, including matters such as easement and right of way acquisition and other ATXI contact with the public, in a manner that the Commission has ordered regarding filings made by KCPL and GMO

in File No. EO-2012-0271 respecting the process of the construction of the Iatan-Nashua 345-kV transmission line.

WHEREFORE the Staff files the instant Staff Report.

Respectfully submitted,

/s/ Steven Dottheim
Steven Dottheim
Chief Deputy Staff Counsel
Missouri Bar No. 29149
(573) 751-7489 (Telephone)
(573) 751-9285 (Fax)
steve.dottheim@psc.mo.gov (e-mail)

Attorney for the Staff of the
Missouri Public Service Commission
P. O. Box 360
Jefferson City, MO 65102

CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing *Staff Report* have been transmitted electronically to all counsel of record this 20th day of February, 2013.

/s/ Steven Dottheim