

**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

PUBLIC COUNSEL’S MOTION FOR CLARIFICATION

COMES NOW the Office of Public Counsel (“Public Counsel”) and moves the Commission to clarify its *Order Granting Motion to Submit Direct Testimony and Directing Staff Recommendation* as follows:

1. On January 28, 2025, the Commission issued its *Order Granting Motion to Submit Direct Testimony and Directing Staff Recommendation* wherein, after allowing the Midcontinent Independent System Operator, Inc. (MISO) to intervene by order dated January 23, 2025, over the request of its Staff to deny MISO’s motion to do so, it allowed MISO to prefile the direct testimony of its witness Jeremiah Doner in support of Ameren Transmission Company of Illinois’ a/k/a ATXI application without explanation other than its statement, “The Commission has reviewed the pleadings and finds good cause to waive Commission Rule 20 CSR 4240-2.130(7), pursuant to Commission Rule 20 CSR 4240-2.015, allowing MISO to submit direct testimony.”

2. The Staff’s opposition to granting MISO’s motion states “Staff does not object to MISO’s intervention, but strongly objects to MISO’s motion to submit direct testimony.” Staff asserted that MISO “fails to truly demonstrate “good cause” for” filing direct testimony.¹

3. Unable to ascertain the Commission’s rationale for its finding of “good cause to waive Commission Rule 20 CSR 4240-2.130(7), pursuant to Commission Rule 20 CSR 4240-

¹ Response of Staff to MISO Motion to Submit Direct Testimony, Case No. EA-2025-0087, January 17, 2025, EFIS No. 37.

2.015,” and the likelihood of similar circumstances arising in the future—a regional transmission organization or independent system operator seeking to file direct testimony to support a transmission builder’s application for Commission authority to build a line—Public Counsel feels compelled to request the Commission to clarify its order by stating its basis for its finding of good cause to allow MISO to prefile direct testimony supporting ATXI’s application. Public Counsel is not arguing that there is no such basis; only that the Commission has not provided one.

Wherefore, the Office of Public Counsel moves the Commission to clarify its *Order Granting Motion to Submit Direct Testimony and Directing Staff Recommendation* by stating its basis for its finding of good cause to allow MISO to prefile direct testimony supporting ATXI’s application.²

Respectfully,

/s/ Nathan Williams

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing have been mailed, hand-delivered, transmitted by facsimile or electronically mailed to all counsel of record this 29th day of January 2025.

/s/ Nathan Williams

² Public Counsel notes that ATXI potentially could have offered MISO’s witness’ testimony as part of its direct filing, and, potentially, MISO could offer its witness’ testimony in rebuttal or surrebuttal.