

**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) File No. EA-2024-0302
Under Section 393.170, RSMo relating to)
Transmission Investments in Northwest)
And Northeast Missouri.)

***Response of the Midcontinent
Independent System Operator, Inc. to
Staff Recommendation***

Summary

1. MISO agrees with Staff that the Commission should issue an order granting the Ameren Transmission Company of Illinois' ("ATXI") request for a Certificate of Convenience and Necessity for the Fairport-Denny-Iowa/Missouri border and Maywood-Mississippi River Crossing Projects ("Projects"). These Projects will improve the reliability of the transmission system in Missouri by resolving thermal issues and increasing transfer limits within the MISO region. Customers in Missouri will reap economic benefits from the Projects that outweigh their costs. However, the Commission should not condition approval of the Projects in the instant proceeding on the approval of the project that is the subject of Case No. EA-2025-0087. Such a condition could result in the delay of constructing the Projects and a corresponding delay in Missouri realizing the reliability and economic benefits provided by the Projects.

MISO as the Party Submitting this Response

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.”¹ “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 Fairport-Denny-Iowa/Missouri border (‘FDIM’) Project and the Maywood-Mississippi River Crossing (‘MMRX’) Project proposed by ATXI in its Application.”² MISO supports approval of the Application.³

Procedural Background

3. On July 16, 2024, ATXI filed the application in the instant case seeking a certificate of convenience and necessity (“CCN”). The FDIM and MMRX Projects are the first phase of the Missouri jurisdictional portion of the MISO Long Range Transmission Planning (“LRTP”) Tranche 1 portfolio of eighteen Multi-Value Projects (“MVPs”).⁴

4. MISO submitted its Application to Intervene on August 14, 2024. The Commission granted MISO’s Application to Intervene on August 27, 2024.⁵

¹ MISO Application to Intervene at Par. 2 (August 14, 2024).

² *Id.* at Par. 4.

³ *Id.* at Par. 5.

⁴ Application at 1-2.

⁵ Order Granting Applications to Intervene, File No. EA-2024-0302 (August 27, 2024).

5. On August 29, 2024, the Commission issued its Order Directing Status Report, directing Staff to “file a status report no later than September 30, 2024.” Staff subsequently filed its Status Report on September 30, 2024 and requested that the Commission grant Staff until December 20, 2024 to file its recommendation. The Commission granted Staff’s request.

6. The Staff Recommendation was filed on December 20, 2024.

7. On January 24, 2025, the Commission issued its Order Directing Filing ordering that “any other party who wishes to respond to Staff’s recommendations shall file their response no later than February 7, 2025.”

Staff Recognizes the Need for the Projects.

8. Staff stated that the “*Applicant* has met the applicable filing requirements for CCN applications for the authority to construct an asset subject to Commission rule 20 CSR 4240-20.045(6).”⁶ Staff recommended that the Commission “issue an order authorizing ATXI’s request for a CCN” for the FDIM and MMRX Projects subject to several conditions.”⁷ One such condition is that the “Commission’s granting of a CCN for Phase 1 Projects be conditioned on a CCN being granted for Phase 2” that is the subject of Case No. EA-2025-0087.⁸

9. In the memorandum attached to Staff’s Recommendation (“Staff Memorandum”), Staff stated that the FDIM and MMRX Projects “will resolve forecasted thermal issues in Missouri, increase transfer levels across MISO’s region, and improve grid resiliency

⁶ Staff Recommendation at Par. 4. (December 20, 2024).

⁷ *Id.* at Par. 5.

⁸ *Id.* at condition 12.

during extreme [weather] events.”⁹ Staff recommended that “the Commission find the projects are effectively a necessity”¹⁰

MISO Supports the Finding of Need for the Projects.

10. MISO agrees with Staff that the Projects are needed and are economically feasible. The LRTP Tranche 1 portfolio, including the Projects, “is necessary to continue to provide for the reliable and economic delivery of energy from the new mix of generation resources to load”¹¹

11. As Staff notes, the FDIM and MMRX Projects are needed to address thermal issues in Missouri.¹² The Projects, along with the rest of the LRTP Tranche 1 portfolio, will reduce loadings on approximately eight highly loaded system elements in Missouri.¹³ The Tranche 1 portfolio will also substantially increase the power transfer limit in the area from 1,640 megawatts (“MW”) to 6,000 MW.¹⁴

12. The FDIM and MMRX Projects will provide economic benefits to Missouri. Zone 5, which is made up of MISO member companies in Missouri, benefits are between 3.0 and 4.2 times the portfolio costs.¹⁵ These benefits include congestion and fuel savings, avoided capital cost of local resources, avoided transmission investment, resource adequacy savings, avoided risk of load shedding, and decarbonization.

⁹ Staff Memorandum at 12:11-13 (December 20, 2024).

¹⁰ *Id.* at 12:20-21.

¹¹ ATXI sponsored Direct Testimony of Justin Davies at 17:17-20 (July 16, 2024).

¹² See *supra*, Par. 9.

¹³ ATXI sponsored Direct Testimony of Justin Davies at 20:10-13 (July 16, 2024) (*citing* Direct Testimony of Jeff L. Dodd, Schedule JLD-D3 at 59-60 (July 16, 2024)).

¹⁴ ATXI sponsored Direct Testimony of Jeff L. Dodd, Schedule JLD-D3 at 60 (July 16, 2024) (“Schedule JLD-D3”).

¹⁵ ATXI sponsored Direct Testimony of Jeff L. Dodd at 30:7-10 (July 16, 2024) (*citing* Schedule JLD-D3 at 5).

MISO Supports the Timely Approval of the Projects.

13. Granting a CCN should not be conditioned on the approval of Phase 2 in Case No. EA-2025-0087. Of course, MISO also supports the timely approval of the project in that case. However, ATXI is targeting an in-service date for the FDIM and MMRX Projects by June 2028, while the target for the Phase 2 facilities is December 2029.¹⁶ If this condition results in a delay in ATXI beginning construction of the Projects, the Applicant may be unable to meet the MISO expected in-service date of June 2030. ATXI's targeted in-service dates are set to "ensure sufficient scheduling flexibility to accomplish long-lead time tasks and to help hedge against prolonged or unforeseeable delays."¹⁷ A delay caused by the regulatory process in addition to a delay experienced by Ameren would mean that the in-service date for the Projects could extend beyond June 2030.

14. A pressing reliability need exists to proceed in a timely manner with the Projects. To achieve the intended benefits, it is important that the Projects be constructed as planned and the Commission timely approve the Projects in this proceeding. As Staff recognizes, the Projects are needed to address thermal issues, so the result of a delay in constructing the Projects would be a transmission system that is less secure, with additional voltage and transient stability limitations.

15. Delaying the construction of the Projects would also lead to a reduction in the economic benefits provided by the Program. The Projects, as part of Tranche 1, will provide economic benefits in excess of the cost of the Projects. A delay in constructing the Projects would delay and diminish Missouri customers' realization of those benefits.

¹⁶ ATXI sponsored Direct Testimony of Tracy Dencker at 34:3-5, 35:2-6 (July 16, 2024).

¹⁷ *Id.* at 35:2-5.

16. A delay in the in-service date for the Projects could also hinder the interconnection of new generation. Interconnection requests for new generation in MISO's 2022 Interconnection Queue cycle assume that the LRTP Tranche 1 portfolio will be made part of the existing transmission network. This queue cycle currently includes 2.7 gigawatts of new generation resources in Missouri.¹⁸ Those requests could be negatively impacted if the LRTP Tranche 1 projects, such as those at issue in the instant proceeding, are delayed.

¹⁸ See https://www.misoenergy.org/planning/resource-utilization/GI_Queue/gi-interactive-queue/. The interconnection requests in Missouri for the 2022 Interconnection Queue cycle can be found by setting the "state" filter to Missouri and searching "DPP-2022" in the search bar.

WHEREFORE, MISO supports the Commission granting the request for a Certificate of Convenience and Necessity for the Projects at issue in this proceeding without conditioning such grant on an approval in any other proceeding.

Respectfully submitted,

/s/ William D. Steinmeier

William D. Steinmeier, Mo Bar #25689
William D. Steinmeier, P.C.
2031 Tower Drive
Jefferson City, MO 65109
(573) 659-8672
wds@wdspc.com

/s/ Jeffery L. Small

Jeffrey L. Small
Senior Corporate Counsel
Midcontinent Independent System
Operator, Inc.
720 City Center Drive
Carmel, IN 46032
(317) 752-7149
jsmall@misoenergy.org

/s/ Max W. Meyer

Max W. Meyer, Mo Bar #75677
Associate Corporate Counsel
Midcontinent Independent System
Operator, Inc.
2985 Ames Crossing Road
Eagan, MN 55121
(952) 232-9130
mmeyer@misoenergy.org

Attorneys for Midcontinent Independent
System Operator, Inc.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was e-mailed on this 7th day of February 2025 to the persons on the Commission's service list in this case.

/s/ William D. Steinmeier

Attorney for Midcontinent Independent System Operator, Inc.