

**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 Public
Convenience and Necessity to
Construct, Install, Own, Operate,
Maintain, and Otherwise Control
and Manage a 138 kV Transmission
Line and associated facilities in
Perry County, Missouri

File No. EA-2025-0222

APPLICATION

Ameren Transmission Company of Illinois (ATXI), pursuant to section 393.170 RSMo., 20 CSR 4240-2.060, and 20 CSR 4240-20.045, makes this application to the Missouri Public Service Commission (Commission) for the following:

- A Certificate of Convenience and Necessity (CCN) authorizing ATXI to construct, install, own, operate, maintain, and otherwise control and manage a new, approximately four-mile, 138-kV transmission line and associated facilities in Perry County, Missouri (the Project or Grand Tower Crossing Project);
- Issuance of a Commission order granting the relief requested in this Application by March 1, 2026, so that the Project can be timely constructed and placed in-service in the fourth quarter of 2028; and

- For such other and further relief as may be appropriate.

In support of its Application, ATXI states as follows:

I. The Applicant

1. ATXI is a corporation organized under the laws of Illinois with its principal office at 1901 Chouteau Avenue, St. Louis, Missouri 63103. ATXI is duly authorized to do business in Missouri. A certified copy of ATXI's Authority to Conduct Business in the State of Missouri is attached hereto as **Appendix A.**

2. ATXI is what is referred to as a transmission-only utility. It was initially created to help facilitate additional transmission development in Illinois. Today, ATXI generally pursues and develops transmission opportunities that create value for end-use customers, in the region in general, but that might not best fit into the project development portfolios of Ameren's traditional incumbent utility subsidiaries, ATXI's affiliates Union Electric Company, d/b/a Ameren Missouri, and Ameren Illinois.

3. ATXI was first recognized by the Commission as a public utility in File No. EA-2015-0145. ATXI has a successful track record in developing several Multi-Value Projects and has also recently expanded its project portfolio to include opportunities like the ones ATXI recently developed in collaboration with Citizens Electric Cooperative and Wabash Valley Power

Alliance on the Limestone Ridge Project in Perry and Cape Girardeau Counties in Southeast Missouri (File No. EA-2021-0087).

4. In addition to the undersigned counsel, correspondence, communications, notices, orders, and decisions of the Commission with respect to this matter should be sent to:

Eric Dearmont
Director and Assistant General Counsel
AMEREN SERVICES COMPANY
One Ameren Plaza
1901 Chouteau Avenue
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(314) 554-3543
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5. Other than matters that may be pending before the Federal Energy Regulatory Commission (FERC), ATXI has no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three (3) years that involve customer service or rates.

6. ATXI has no overdue or unpaid annual reports or assessment fees.

7. An affidavit providing the authorized officer verification required by 20 CSR 4240-2.060(1)(M) is attached as **Appendix B** to this Application.

8. A 60-day notice with respect to the authority sought herein was filed on February 13, 2025, and assigned the above-captioned file number.

II. The Project

9. ATXI is seeking a CCN to construct, install, own, operate, maintain, and otherwise control and manage approximately four miles of 138-kV transmission line and related facilities (the Project) in Perry County, Missouri. The requested CCN and related approvals will enable ATXI to participate in a collaborative effort among ATXI, Citizens Electric Corporation (Citizens) and Ameren Illinois to construct a transmission line from Citizens' Wittenberg substation in Perry County, Missouri, to a new substation to be constructed adjacent to Ameren Illinois' existing Grand Tower substation in Illinois. ATXI intends to design the line in a manner that could, in the future, provide additional strategic value to the region. The line (meaning conductor) that will be energized as a part of the initial Project will be a single 138-kV line. ATXI intends, however, to design and install structures that are capable of being outfitted with an additional transmission circuit at a voltage of up to 345-kV in the future.

10. Citizens is a local distribution corporation in the Project area and a Midcontinent Independent System Operator (MISO) Transmission Owner that owns and operates the Wittenberg substation in Perry County, and Citizens will construct a new position at the existing Wittenberg substation to enable ATXI to connect the new 138-kV transmission line to the substation. Citizens does not require a CCN from the Commission to

construct this new position at its substation. Ameren Illinois is responsible for constructing the new transmission line within Illinois and the new substation at a site adjacent to its existing Grand Tower substation in Illinois, which will provide the connection point for the new transmission line. Consistent with Illinois law, Ameren Illinois will not require a CCN from the Illinois Commerce Commission to construct the new substation or line facilities. The responsibilities of the Project parties are more fully described in the direct testimony of ATXI witness Eric Paulek.

11. Acquisition of easement rights and construction of the Grand Tower Crossing Project is currently scheduled to begin in the second quarter of 2026 and the Project is anticipated to be completed and placed into service by the end of the fourth quarter of 2028.

III. Summary of Direct Testimony

12. A list of ATXI witnesses providing direct testimony in support of this Application, and the subject matters covered are summarized in the following table:

Witness	Subject Matter
Eric C. Paulek	Mr. Paulek is the Project Manager assigned to the Project and will provide an overview of the Project, introduce other witnesses, describe the relationship between the Project parties, describe the Project schedule and estimated cost of the Project, explain ATXI's financing of the Project, and address how the Project satisfies the <i>Tartan</i> criteria, demonstrating

	that the Project is necessary and convenient for the public service.
Justin D. Wenk	Mr. Wenk is the Transmission Line Design Engineer in the Transmission Line Design Department and will testify to the design of the transmission line.
Dan Schmidt	Mr. Schmidt works for HDR, Inc. (HDR), a consulting firm ATXI hired to perform several tasks related to the Project. Mr. Schmidt will generally testify about how ATXI developed its proposed transmission line route and will sponsor the related route study.
Jennifer Spurlock	Ms. Spurlock is a Senior Real Estate Agent in the Real Estate Department and will testify to the real estate aspects of the Project, including ATXI's proposed easement acquisition strategies.
Leah Dettmers	Ms. Dettmers, Manager of Stakeholder Relations and Training, will testify about ATXI's pre-filing open house and public engagement efforts, as well as coordination with the local, state, and federal agencies regarding the Project.

IV. The Grand Tower Crossing Project is Necessary or Convenient for the Public Service (the *Tartan* factors¹).

13. The Commission traditionally analyzes an application for a CCN using the following factors:

- a. Need for the Project;
 - b. Economic Feasibility of the Project;
 - c. Ability of the Applicant to Finance the Project;
 - d. Qualifications of the Applicant to Construct the Project;
- and

¹ While a project is not required as a matter of law to meet the "*Tartan* Factors," the Commission has traditionally analyzed CCN applications using those factors. See *In Re Tartan Energy*, GA-94-127, 3 Mo.P.S.C.3d 173, 177 (1994).

e. Whether the Project is in the Public Interest.

An affirmative finding on the first four factors generally leads to the conclusion that the final factor, public interest, is satisfied.²

a. There is a need for the Grand Tower Crossing Project.

14. The Grand Tower Crossing Project is needed for several reasons. As the direct testimony of ATXI witness Eric Paulek explains, the Project will not only resolve NERC concerns for facilities owned by Citizens in the area, it will also provide Ameren Missouri customers increased reliability and resiliency in their own electric transmission service by allowing a means to re-route service should existing transmission lines suffer loss.

15. In sum, the proposed Grand Tower Crossing Project is an improvement that justifies its costs.³

b. The Grand Tower Crossing Project is economically feasible.

16. The Grand Tower Crossing Project is economically feasible. As explained in the direct testimony of ATXI witness Eric Paulek, the Grand Tower Crossing Project meets several needs and is an improvement justifying its cost. The cost of the Project will be shared between Ameren Missouri and Citizens customers, as well as other wholesale customers connected to the

² *Id.* at 189 (citing *In re: Intercon Gas, Inc.*, 30 Mo. P.S.C. 554, 561 (1991)).

³ *Id.*

Ameren transmission system in Missouri. The customer impact will be minimal and the benefits, in terms of regional reliability and strategic value, will outweigh those costs. Had Citizens executed a similar project without ATXI involvement, customers in the Ameren Missouri Pricing Zone would have similarly been allocated costs without receiving the added upside of future strategic benefits.

c. ATXI is able to finance the Grand Tower Crossing Project.

17. As explained in the direct testimony of ATXI witness Eric Paulek, ATXI has the financial capability to generate and raise the capital needed to develop the Project. ATXI will finance the Project with either available cash on hand or short-term borrowings which are available to the Company.

d. ATXI is qualified to construct the Project.

18. As explained in the direct testimony of ATXI witness Eric Paulek, ATXI is qualified to construct the Project and to operate it, given the financial, technical, and management expertise ATXI has developed over the course of its history constructing transmission facilities in Missouri and Illinois. Specifically, ATXI has constructed, either independently or in conjunction with other public utilities, over 560 miles of transmission lines in Iowa, Missouri, and Illinois.

e. The Grand Tower Crossing Project is in the public interest.

19. As discussed in ATXI witness Eric Paulek's direct testimony, construction of the Project promotes the public interest because in addition to the fact that it meets the first four *Tartan* factors, the Project promotes the public interest for other reasons, including because the Project increases reliability of service for Ameren Missouri customers, Citizens customers, and Ameren Illinois customers. In addition, constructing the line to readily accept the addition of a 345-kV transmission line in the future furthers the public interest for future Ameren Missouri customers by creating a cost benefit by avoiding costs associated with constructing an additional transmission line across the Mississippi River when the anticipated need for additional transmission arises.

V. Filing Requirements under 393.170.1, RSMo., and 20 CSR 4240-20.045(6).

20. As required by 20 CSR 4240-20.0456(6), ATXI provides the following:

- a. The Project route of the new transmission line in Perry County, Missouri, is depicted in **Appendix C** to this Application, and the legal description of the proposed route is attached as **Schedule JS-01** to the direct testimony of ATXI witness Jennifer Spurlock (20 CSR 4240-20.045(6)(A));

b. A list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and non-regulated utilities, railroad tracks, and each underground facility, as defined in Section 319.015, RSMo., that the proposed construction will cross is attached as **Appendix D** to this Application (20 CSR 4240-20.045(6)(B));

c. The Project's scope of the construction, the Project's estimated cost (and the portion of those total Project costs to be allocated to ATXI and to the Ameren Missouri Pricing Zone), and the operational features once the transmission line is fully operational and in-service are discussed by ATXI witness Eric Paulek; the existing Project specifications and existing drawings can be found in **Schedules JDW-01** through **JDW 04** of ATXI witness Justin Wenk's direct testimony (20 CSR 4240-20.045(6)(C));

d. The projected beginning construction date is Fall 2027, and the anticipated fully operational and used for service date of the Project is December 31, 2028 (20 CSR 4240-20.045(6)(D));

e. The Grand Tower Crossing Project has no common plant (20 CSR 4240-20.045(6)(E));

f. ATXI's plans for financing the Grand Tower Crossing Project are included in the direct testimony of ATXI witness Eric Paulek (20 CSR 4240-20.045(6)(F));

g. ATXI is not subject to 20 CSR 4240-22, as it is not an electric utility that sold more than one (1) million megawatt-hours to Missouri retail electric customers in calendar year 2009. See 20 CSR 4240-202.080(1). Accordingly, the requirement to describe how the Project relates to the utility's adopted preferred plan is not applicable to ATXI (20 CSR 4240-20.045(6)(G));

h. An overview of ATXI's plan for the Project regarding competitive bidding for the design, engineering, procurement, construction management, and construction of the Project is provided in the direct testimony of ATXI witness Eric Paulek. (20 CSR 4240-20.045(6)(H));

i. ATXI witness Eric Paulek provides an overview of plans for operating and maintaining the Project in his direct testimony (20 CSR 4240-20.045(6)(I));

j. Plans for the restoration of safe and adequate service after significant, unplanned/forced outages of the Project are discussed in the direct testimony of ATXI witness Eric Paulek (20 CSR 4240-20.045(6)(J)); and

k. An affidavit certifying compliance with the notice requirements to landowners directly affected by the routes and locations of the Project, as applicable, is attached as **Appendix E** to

this Application; the affidavit includes a list of all directly affected landowners to whom notice was sent.⁴ (20 CSR 4240-20.045(6)(K)).

21. ATXI has not yet determined what assents, permits or other authorizations may be required from any affected governmental bodies in order to commence construction of the new transmission line. If any are required, ATXI will provide them when they are available, consistent with Missouri law, as permitted under 20 CSR 4240-20.045(3)(C).

VI. Conditional Request

22. 20 CSR 4240-20.045(3)(C) provides that “If any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.”

23. As explained in ATXI witness Paulek's testimony, an amendment to the JDA has not yet been executed by the Project parties, although the parties have reached agreement in principle and the agreement's execution is imminent. The material changes that form the basis of the amendment are described in Mr. Paulek's testimony. ATXI will provide the Commission and

⁴ ATXI is filing confidential and public versions of **Appendix E**. The confidential version contains the names and addresses of landowners and is confidential pursuant to 20 CSR 4240-2.135(2)(A)(1).

its Staff with the executed copy of the final version of the amendment agreement, once executed. To be clear, ATXI anticipates being able to provide an executed copy of the amendment to the JDA during the pendency of the case.

24. ATXI recognizes that its request for a CCN before all agreements have been executed is not typical. While ATXI had intended for all agreements to be final before filing its application, the complexity of the transaction coupled with the timing of the parties' needs made such an approach impracticable. Accordingly, ATXI is requesting a CCN for this Project at this junction so as not to delay construction and the resulting benefits of the Project to Ameren Missouri customers, as well as the customers of Citizens and Ameren Illinois.

VII. Other Matters

25. Because ATXI will not provide retail service to end-use customers and will not be rate-regulated by the Commission, ATXI requests that the Commission waive the depreciation study requirement of 20 CSR 4240-3.175, the reporting requirements of 20 CSR 4240-3.190(1), (2) and 3(A)-(D), the annual reporting requirement of 20 CSR 4240-10.145, the rate schedule filing requirement of 20 CSR 4240-20.105, for good cause.

26. ATXI will continue to file with the Commission the annual report it files with the Federal Energy Regulatory Commission.

27. ATXI is not seeking expedited treatment of this Application, but for the purposes of planning, requests an order from the Commission by March 1, 2026, which is in line with a typical timeline for processing a CCN application of this nature. The importance of receiving an order from the Commission by March 1, 2026, to meet the Project's scheduled in-service date of December 31, 2028, is discussed in the direct testimony of ATXI witness Paulek.

WHEREFORE, ATXI respectfully requests the Commission grant its request for a CCN for the Project and take such other action as it determines the law requires for approval of all aspects of the Project.

Respectfully submitted,

/s/ Jason Kumar

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the foregoing was served on the Staff of the Commission and the Office of the Public Counsel via electronic mail (e-mail) on this 1st day of May, 2025.

/s/ Michael R. Tripp

Attorney for Ameren Transmission
Company of Illinois