

**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.)	

Midcontinent

***Independent System Operator, Inc. Response to the Revised Conditions
within the Joint Status Report Filed on March 7, 2025***

Summary

1. The Midcontinent Independent System Operator, Inc. (“MISO”) supports issuance of 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”). MISO is a signatory to the Joint Status Report filed on March 7, 2025 that recommends issuance of a certificate, and that recommendation is the subject of the Commission Order issued on April 10, 2025. 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. The conditions stated in the Joint Status Report will permit the Applicant to move forward with construction of these important Projects if the Commission acts to approve the Certificate of Convenience and Necessity (“CCN”).

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.

Background Filings

3. On July 16, 2024, ATXI filed the application in the instant case seeking a 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”).³ MISO submitted its Application to Intervene on August 14, 2024, and the Commission granted MISO’s Application to Intervene on August 27,

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

² *Id.* at Par. 4.

³ Application at 1-2.

2024.⁴ MISO stated its support for approval of the Application in its Application to Intervene.⁵

4. The Commission directed the filing of a Staff Recommendation, which was filed by Staff on December 20, 2024. In response to the Commission's January 24, 2025 Order Directing Filing[s] in response to the Staff Recommendation, MISO agreed with Staff regarding the need for the Projects, supporting the issuance of a CCN.⁶ However, MISO stated that "[g]ranting a CCN should not be conditioned on the approval of Phase 2 in Case No. EA-2025-0087," as recommended by Staff.⁷ A Staff Report has yet to be issued in Case No. EA-2025-0087. MISO supports the timely approval of the project described in Case No. EA-2025-0087, but the condition would likely result in unwarranted delay in ATXI beginning construction of the Projects.⁸

5. The Commission issued an Order Directing Filing of Status Report on February 10, 2025. On March 7, MISO joined with other parties (including Staff) that did not oppose the Revised Conditions attached to a Joint Status Report.⁹ The Revised Conditions attached to the Joint Status Report will permit the Applicant to move forward with construction of these important Projects.¹⁰

⁴ Order Granting Applications to Intervene, File No. EA-2024-0302 (August 27, 2024).

⁵ MISO Application to Intervene at Par. 5 (August 14, 2024).

⁶ Response of MISO to Staff Recommendation at Par. 10-11 (February 7, 2025).

⁷ *Id.* at 13.

⁸ *Id.*

⁹ Joint Status Report, Appendix A (March 7, 2025).

¹⁰ The Revised Conditions state that ATXI will "not [be] restrict[ed] [in its] ability to exercise the authority granted in the CCN for the Phase 1 Projects, including engineering, environmental permitting, easement acquisition, right-of-way clearing, access, and line or substation construction until such time as the Commission reaches a determination with respect to Phase 2 of the Program. . . ." *Id.* at Par 12.

MISO Supports Timely Approval of the Projects.

6. ATXI is targeting an in-service date for the FDIM and MMRX Projects by June 2028.¹¹ ATXI's dates are set to "ensure sufficient scheduling flexibility to accomplish long-lead time tasks and to help hedge against prolonged or unforeseeable delays."¹² Issuance of an order granting a CCN, subject to the Revised Conditions, will permit ATXI to begin construction of the Projects in time to meet ATXI's targeted in-service date. However, any further delay in issuing such an order may harm that timetable since seasonal considerations exist in the construction timeline.¹³

7. At the time of the prehearing conference on April 9, 2025, no party disputed the need for the Projects. The signatories to the Joint Status Report, which included every party at the time aside from the Office of Public Counsel ("OPC"), stated that they "do not object to the Commission granting the requested CCN."¹⁴ The OPC represented at the prehearing conference that "we do need this line. . . ."¹⁵

8. The only issues that have been disputed involve routing issues and landowner notice. However, the OPC's landowner issues have been addressed,¹⁶ including additional notice to landowners.¹⁷ The extensions to the intervention deadline have not elicited any unambiguous statement by a prospective party that the Projects are not needed.¹⁸ The CCN should be issued as provided in the Joint Status Report.

¹¹ ATXI sponsored Direct Testimony of Tracy Dencker at 34:3-5, 35:2-6 (July 16, 2024).

¹² *Id.* at 35:2-5.

¹³ Transcript of Prehearing Conference at 11:9-14 (April 9, 2025) ("Transcript").

¹⁴ Joint Status Report at Par. 18 (Mar. 7, 2025).

¹⁵ Transcript at 8:20-21.

¹⁶ *See generally*, Reply of ATXI to OPC Response to Staff Recommendation (March 21, 2025).

¹⁷ Transcript at 5:15-20.

¹⁸ Six applications to intervene were submitted after the prehearing conference was held on April 9, 2025. Paul Kazakevicius stated that he is an "advocate for renewable energy. . . ." (Kazakevicius Application to

WHEREFORE, MISO supports the Commission granting Applicant's request for a Certificate of Convenience and Necessity for the Projects at issue in this proceeding.

Respectfully submitted,

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Intervene at Par. 2, April 16, 2024). His refiled pleading states that he “fully support[s] the construction of transmission lines,” but has concerns over placement near homes. (Kazakevicius Application to Intervene at Par. 4, April 22, 2024). Rebecca McGinley states that she seeks to “protect . . . her own Property.” (Application to Intervene at Par. 5, April 18, 2025). Kevin and Rochelle Hiatt are concerned about the distance from their home to the proposed line. (Hiatt Application to Intervene at Par. 3, April 18, 2025; refiled Application to Intervene at Par. 2, April 27, 2025). F. Neil Mathews states that use of the “western (DO-27) route” would mean “that the project can proceed without opposition from me.” (F. Neil Mathews Application to Intervene at 2, April 18, 2025). David Gregory recognizes that the Projects “contribute to [a] larger cause” but that affected land “has been intended to be used for home building. . . .” (Application to Intervene at Par. 5, April 18, 2025). Mark Harding’s intervention states that he can assist in “determining the best path. . . .” (Harding Application to Intervene at Par. 3, April 17, 2024). Mr. Harding mentions a route that was “used when applying for and winning the bid from MISO.” (*Id.* at Par 5). MISO considers the seriousness of bidders to construct a project during the bidding process, but MISO’s determination of a successful bidder is not accompanied by any obligation to construct a particular route.

/s/ Max W. Meyer

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CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was e-mailed on this
2nd day of May 2025 to the persons on the Commission's service list in this case.

/s/ William D. Steinmeier

Attorney for Midcontinent Independent System
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