

**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) File No. EA-2024-0302
under Section 393.170.1, RSMo, Relating)
to Transmission Investments in Northwest)
and Northeast Missouri)

**AMEREN TRANSMISSION COMPANY OF ILLINOIS' SUPPLEMENTAL
RESPONSE TO KAZAKEVICIUS APPLICATION TO INTERVENE**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and in further response to the Application to Intervene filed by Paul Kazakevicius (Kazakevicius) on April 22, 2025 (4/22 Kazakevicius Application), states as follows:

1. Paul Kazakevicius had filed an Application to Intervene on April 16, 2025 (4/16 Kazakevicius Application). He also filed an Application to Intervene on April 22, 2025 (4/22 Kazakevicius Application) in response to the Order Setting Time to Correct Deficiency issued by the Commission on April 16, 2025.

2. The Commission issued an Order Directing Filing on April 23, 2025, ordering that “No later than May 2, 2025, any party who wishes to do so, shall file a response to the Application to Intervene filed by Mr. Kazakevicius on April 22.”

3. On April 28, 2025, ATXI filed a single response to all New Applications to Intervene filed by applicants in response to the Order Setting Intervention Deadline issued by the Commission on April 4, 2025, including responses to both the 4/16 Kazakevicius Application and the 4/22 Kazakevicius Application (ATXI 4/28 Response).

4. In the ATXI 4/28 Response the Company stated as follows:

14. The 4/22 Kazakevicius Application establishes that Mr. Kazakevicius is not a directly impacted landowner. He does not identify the specific property he owns and alleges only that the proposed transmission line

will be “Near” his property. ATXI is not aware of any property directly owned by Mr. Kazakevicius over which ATXI would require an easement for its proposed route or which is within 300 feet of the centerline of ATXI’s proposed route. ATXI is aware of property owned by Karma Unlimited, LLC, for which Secretary of State records indicate Mr. Kazakevicius is a member. The property owned by Karma Unlimited is approximately 2,700 feet from the centerline of ATXI’s proposed route. Based on the foregoing, Mr. Kazakevicius has not established that he has an interest which is different from that of the general public and which may be adversely affected by a final order arising from this case.

15. Mr. Kazakevicius is also not a person who was entitled to but did not receive notice of the application under 20 CSR 4240-20.045(6)(K). Nor is he a person who was entitled to notice of the application. The Commission’s April 4, 2025 Order is clear that the intent of that order was to address intervention for “some landowners who would be affected by the transmission line in this matter” but “did not receive notice from ATXI until seven months after that intervention deadline had passed.” Order (April 4, 2025). ATXI submits that given the clear intent of the April 4 Order and taking into account all portions of the Order, that Order extends the time for intervention only for affected landowners who were entitled to but did not initially receive notice of the application.

ATXI 4/28 Response, ¶¶ 14 and 15.

5. ATXI has continued its efforts to identify the specific property Mr. Kazakevicius references in the 4/22 Kazakevicius Application. That investigation has not disclosed any properties owned by Mr. Kazakevicius in his own name. However, that investigation has identified two additional contiguous parcels in Worth County owned by Karma Unlimited, LLC which appear to be the property he asserts is “Near” ATXI’s proposed route. Those parcels (Parcel ID 08-09.0-31-00-00-04.00 and Parcel ID 08-09.0-32-00-00-03.02) are not within 300 feet of the centerline of ATXI’s proposed route. Rather, the northwest corner of Parcel 08-09.0-31-00-00-04.00 is approximately 820 feet from the centerline of ATXI’s proposed route, with the southeast corner of that parcel approximately 3,470 feet from the centerline of ATXI’s proposed route. The northwest corner of Parcel 08-09.0-32-00-00-03.02 is approximately 1,130 feet from the centerline of ATXI’s proposed route, with the western and southwestern borders of that irregularly shaped parcel being approximately 3,650 feet and 4,080 feet from the centerline of ATXI’s proposed route.

6. This new information continues to support the positions taken by ATXI in the 4/28 ATXI Response in opposition to the 4/22 Kazakevicius Application, including that Mr. Kazakevicius has not established an appropriate interest to intervene or made a showing of good cause to intervene at this late date. In addition, since the property referenced by Mr. Kazakevicius is owned by a limited liability company, it is a legal entity that requires representation by counsel per the Commission's rules. 20 CSR 4240-2.040(5) ("A natural person may represent himself or herself. Such practice is strictly limited to the appearance of a natural person on his or her own behalf and shall not be made for any other person or entity.").

WHEREFORE, ATXI continues to respectfully request that the Commission issue an order denying the 4/22 Kazakevicius Application to Intervene.

Dated: May 2, 2025

Respectfully submitted,

/s/ Carmen L. Fosco
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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on May 2, 2025.

/s/ Carmen L. Fosco _____

Carmen L. Fosco