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 Necessity under and Section) RSMo. 393.170.1. relating to Transmission Investments in) Northwest and Northeast Missouri))

Case No. EA-2024-0302

THE OFFICE OF THE PUBLIC COUNSEL'S RESPONSE TO REVISED CONDITIONS

COMES NOW the Office of the Public Counsel ("OPC" or "Public Counsel") and for its Response to Revised Conditions, states as follows:

The OPC's Comments on Joint Status Report Conditions

As of today, the OPC's stance remains unchanged from the day of the April 9th prehearing conference. After a thorough review of the conditions that Ameren Transmission Company of Illinois ("ATXI") and Public Service Commission Staff ("Staff") negotiated, the OPC approves of, and appreciates, the conditions that the parties have agreed to in the *Joint Status Report*. In the Public Counsel's view, the additional conditions regarding applications for transmission line projects will provide affected members of the public with more clarity. Further, conditions such as ¶16 will reduce—if not eliminate—notice concerns such as the ones that the OPC had here.

However, the Public Counsel remains concerned about our ability to further ensure that affected landowners are not missed or ignored in this process. Moreover, the issue of public communication regarding these lines and their placement persists. The OPC looks forward to continuing to have those discussions with the parties in this case.

Finally, the Public Counsel would like to acknowledge the pending applications to intervene in this case. There are six (6) applications to intervene awaiting the Public Service Commission's ("Commission's") approval, so the Public Counsel believes it would be inappropriate for this office to seek any final determination. If the Commission grants one (1) or more of these applications to intervene, then those intervenors must be able to choose whether they support the conditions, as well. At this time, these possible intervenors have not had access to all of the information that the OPC and the signatories to the *Joint Status Report* has had. Therefore, the Public Counsel believes the Commission should not determine how to handle the conditions spelled out in *Joint Status Report* until the Commission makes a determination on the applications to intervene.

WHEREFORE, the OPC submits this Response to the Revised Conditions filed on March 7, 2025.

Respectfully,

By: <u>/s/ Anna Kathryn Martin</u>

Anna Kathryn Martin (Mo Bar #72010) Associate Counsel P. O. Box 2230 Jefferson City MO 65102 (573) 526-1445 (573) 751-5562 FAX <u>anna.martin@opc.mo.gov</u>

CERTIFICATE OF SERVICE

I hereby certify that copies of the forgoing have been mailed, emailed, or hand-delivered to all counsel of record this 2nd day of May, 2025.

/s/ Anna Martin