

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

**AMEREN TRANSMISSION COMPANY OF ILLINOIS'
RESPONSE TO REVISED CONDITIONS**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and in response to the Order issued April 10, 2025, by the Missouri Public Service Commission (Commission), providing that "[n]o later than May 2, 2025, any party who wishes to do so, shall file a response to the revised conditions within the Joint Status Report filed on March 7, 2025," states as follows:

1. On March 7, 2025, in response to a Commission order issued February 10, 2025, ATXI, Staff of the Commission (Staff), Clean Grid Alliance, Midcontinent Independent Operator, Inc. (MISO), Missouri Joint Electric Utility Commission, Renew Missouri Advocates, and Sierra Club filed a Joint Status Report stating, *inter alia*, that: (i) "ATXI and Staff have reached agreement on limited revisions to Staff's recommended Conditions" attached as Appendix A to the Joint Status Report; and (ii) all signatories to the Joint Status Report have reviewed the Revised Conditions agreed upon by Staff and ATXI and do not object to the Commission granting the requested [certificate of convenience and necessity (CCN)] and other relief requested in the Application on the basis of the Company's direct testimony and Staff's Recommendation with the Revised Conditions agreed upon by Staff and ATXI."

2. ATXI continues to agree to and support the Revised Conditions attached to the Joint Status Report and entry of an order granting the requested CCN subject to the Revised Conditions;

no other signatory to the Joint Status Report has advised ATXI that it has modified or revised its position supporting the Revised Conditions and entry of an order granting the requested CCN subject to the Revised Conditions.

3. Counsel for ATXI has communicated with the Office of the Public Counsel (OPC) since the prehearing conference held on April 9, 2025, and expressed its willingness to engage in discussions with OPC regarding its concerns and any additional conditions it may want to propose. While ATXI and OPC have engaged in discussions since April 9, 2025, the discussions to date have not resulted in any specific additional proposed conditions for ATXI to consider, and ATXI and OPC have not reached any specific agreement or understanding at this time. ATXI understands that OPC intends to file a response to the Revised Conditions on May 2, 2025.

4. ATXI notes that no party, including OPC, has questioned that the Company has shown that the FDIM and MMRX Projects for which it seeks a CCN are needed and will provide benefits to Missouri citizens and customers. *See* Transcript (April 9, 2025), p. 8, lines 18-22. In the event that an evidentiary hearing or procedural schedule is determined to be needed to advance this proceeding to a final order, either because any of the pending applications to intervene are allowed¹ and/or because of OPC's or any other party's response to the Revised Conditions requests or continues to request an evidentiary hearing, ATXI respectfully requests that this matter be set for an additional prehearing conference as soon as possible to avoid further delay for this case which has been pending more than nine (9) months.

¹ In ATXI's Response to the New Applications to Intervene filed on April 28, 2025, it respectfully requests that the New Applications to Intervene be denied since none of those applicants were persons who did not receive or had issues with the original notice of the Company's application and a showing of good cause for intervening at this late date has not been made.

WHEREFORE, ATXI respectfully requests that the Commission accept this response to the Revised Conditions contained in the Joint Status Report filed on March 7, 2025.

Dated: May 2, 2025

Respectfully submitted,

/s/ Carmen L. Fosco

Albert D. Sturtevant (practicing *pro hac vice*)

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***Attorneys for Ameren Transmission Co
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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