BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

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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 to Transmission Investments in Northwest and Northeast Missouri

File No. EA-2024-0302

AMEREN TRANSMISSION COMPANY OF ILLINOIS' RESPONSE TO APPLICATION TO INTERVENE OF REBECCA MCGINLEY AND MCGINLEY-KRAWCYK FARMS

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company),

through its undersigned counsel, and in response to the Application to Intervene filed by Rebecca

McGinley (Mrs. McGinley) and McGinley-Krawczyk Farms, LLC (McGinley Farms) on May 6,

2025 (Second Application), states as follows:

1. Mrs. McGinley filed an Application to Intervene on April 18, 2025 (First

Application). In ATXI's Response to Applications to Intervene filed on April 28, 2025, the

Company stated as follows:

The Application to Intervene of Mrs. McGinley indicates McGinley-Krawczyk Farms, LLC owns the property in question. As such, ATXI is unclear if the intervention application is filed on behalf of Mrs. McGinley or McGinley Krawczyk Farms, LLC. ATXI submits that the application to intervene establishes that McGinley Krawczyk Farms, LLC has property along the proposed route but not Mrs. McGinley personally. As such, ATXI submits that Mrs. McGinley has not established a recognizable interest for intervention.

ATXI Response to Applications to Intervene (April 28, 2025, fn. 2).

2. The Second Application does not dispute that the property forming the basis of the application to intervene is owned by McGinley Farms, confirms that Mrs. McGinley is the sole member of McGinley-Krawczyk Farms, LLC., and indicates that intervention is sought on behalf of both Mrs. McGinley and McGinley farms. The Second Application also indicates that Mrs. McGinley and her family reside on one of the parcels in question.

3. In its Order Regarding Applications to Intervene and Directing Filing of Procedural Schedule issued May 7, 2025, the Commission ruled and made clear that the Order issued April 4, 2025, reopening intervention based on certain landowners who had not received notice, "was not a restrictive intervention period open to only those landowners, but rather a reopening of the intervention deadline for any person wishing to intervene." Based on the Commission's clarification, ATXI has no objection to the intervention request by McGinley Farms.

4. Based on the Second Application, ATXI continues to submit that Mrs. McGinley, as the sole member of McGinley Farms, has not established a recognizable interest for intervention separate from McGinley Farms, the owner of the property affected by the Company's Proposed Route.

WHEREFORE, ATXI does not object to the intervention request by McGinley Farms and respectfully request that the Commission issue an order denying the Second Application as to Applicant Mrs. McGinley.

Dated: May 9, 2025

Respectfully submitted,

AMEREN TRANSMISSION COMPANY OF ILLINOIS

By: <u>/s/ Carmen L. Fosco</u> One of its attorneys

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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 9, 2025.

<u>/s/. Carmen L. Fosco</u> Carmen L. Fosco