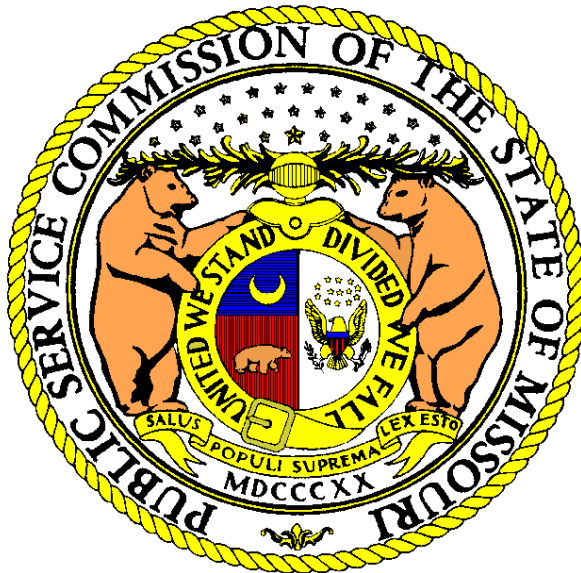


# MISSOURI PUBLIC SERVICE COMMISSION

## STAFF

## RECOMMENDATION



AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2025-0087

*Jefferson City, Missouri  
June 2, 2025*

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**AMEREN TRANSMISSION COMPANY OF ILLINOIS**

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# STAFF RECOMMENDATION

## AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2025-0087

### I. Executive Summary

On December 11, 2024, Ameren Transmission Company of Illinois (“ATXI”) filed an Application seeking a certificate of convenience and necessity (“CCN”) to construct, install, own, operate, control, manage, and maintain Phase 2 of the Northern Missouri Grid Transformation Program (“Phase 2 Project”). ATXI is partnering with both the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”) and Ameren Missouri in its development of the Northern Missouri Grid Transformation Program.

Staff reviewed ATXI’s Application and Direct Testimony based on the five factors the Commission listed in *In Re Tartan Energy*, 3 Mo.P.S.C.3d 173 (1994) (“Tartan Criteria”)<sup>1</sup>:

- Need,
- Qualifications to own, operate, control and manage the facilities and provide the service,
- Financial ability to provide the proposed service,
- Economic feasibility of the proposed project, and
- Promotion of the public interest.

In summary, based on Staff’s review: 1) the Phase 2 Project is needed; 2) ATXI is qualified to construct, install, own, operate, control, manage, and maintain the Phase 2 Project; 3) ATXI has the financial ability to undertake the Phase 2 Project; 4) the Phase 2 Project is economically feasible; and 5) the Phase 2 Project is in the public interest with the conditions recommended by Staff. As such, Staff recommends that the Commission grant ATXI a CCN for the Phase 2 Project.

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<sup>1</sup> This case is also filed under the Missouri Public Service Commission Electronic Filing and Information System (“EFIS”) as File No. GA-94-127.

Staff’s recommended conditions are presented in the public interest section of this report and cover the following topics:

- Right-of-way acquisition process and micro-siting;
- Reporting requirements; and
- Future landowner communications.

## **II. Application Summary**

The Northern Missouri Grid Transformation Program (“Program”) is Missouri’s jurisdictional portion of the Midcontinent Independent System Operator’s (“MISO”) Long-Range Transmission Planning (“LRTP”) Tranche 1 Portfolio, incorporated into the 2021 MISO Transmission Expansion Plan (“MTEP21”). The LRTP Tranche 1 Portfolio consists of 18 Mult-Value Projects (“MVPs”) across the MISO footprint. Of the 18 MVPs, 3 MVPs include footprints in Missouri:

- a) Orient – Denny – Fairport
- b) Denny – Zachary – Thomas Hill – Maywood
- c) Maywood - Meredosia

The Fairport to Denny to Iowa/Missouri Border (“FDIM”) Project refers to the Missouri portion of the Orient – Denny - Fairport route. The Maywood to Mississippi River Crossing (“MMRX”) Project refers to the Missouri portion of the Maywood - Meredosia route. The Denny – Zachary – Thomas Hill – Maywood route (“Project” or “DZTM Project”) is entirely in Missouri. ATXI has applied for two CCNs related to the Northern Missouri Grid Transformation Program.<sup>2</sup>

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<sup>2</sup> File No. EA-2024-0302 regarding Phase 1, and File No. EA-2025-0087 for Phase 2.

1           The subject of this CCN application is referred to in ATXI's application as the Phase 2  
2 DZTM Project. More specifically, the DZTM Project includes construction of slightly  
3 over 200 miles of new 345 kilovolt (kV) transmission line in the counties of Dekalb, Daviess,  
4 Grundy, Sullivan, Adair, Knox, Lewis, Marion, Macon and Randolph.<sup>3</sup>

5           In its Application, ATXI specifically seeks the Commission's decision on whether to  
6 approve the Denny – Zachary segment as a single circuit or a double circuit.<sup>4</sup> The single circuit  
7 option would be routed primarily along Associated Electric Cooperative, Inc. ("AECI")  
8 transmission line corridors.<sup>5</sup> The double circuit option would rebuild the existing 161 kV  
9 transmission line owned by AECI in a double circuit configuration. Additionally, a portion of this  
10 segment would be greenfield construction.<sup>6</sup> ATXI would construct its 345 kV line with double  
11 circuit structures to accommodate a future AECI 161 kV transmission line. In other words, if the  
12 Commission ordered the double circuit configuration, the new 345 kV ATXI line from Denny to  
13 Zachary would be primarily co-located on a single set of structures with existing or future 161 kV  
14 AECI transmission lines.<sup>7</sup> According to ATXI's application, the double circuit option is estimated  
15 to be \$48.5 million more than the single circuit option.<sup>8</sup> However, the double circuit option  
16 reduces new easement area.<sup>9</sup>

17           In addition to the granting of a CCN for the Phase 2 Projects, ATXI is seeking permission  
18 to transfer a 49% undivided interest in the DZTM Project assets to MJMEUC, in accordance with

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<sup>3</sup> 20 CSR 4240-20.045(6)(A) requires a description of the proposed route or site of construction. Application Appendix E, F, and G depicts the DZTM route.

<sup>4</sup> Application, Section IX, page 26.

<sup>5</sup> Direct Testimony of Dan Schmidt, page 4, line 12-13.

<sup>6</sup> Application, paragraph 22.

<sup>7</sup> Application, paragraph 22 and Direct Testimony of Dan Schmidt, page 9, line 19-20.

<sup>8</sup> Application, paragraph 39.

<sup>9</sup> Application, paragraph 23.

1 the terms of the Joint Ownership Agreement. The transfer of a minority interest to MJMEUC  
2 lowers the FDIM Project cost. Both ATXI's and MJMEUC's investment in the Project will be  
3 reflected in their respective Federal Energy Regulatory Commission ("FERC") jurisdictional  
4 formula rates. FERC formula rates are used to assess transmission charges to load in the  
5 Ameren Missouri Transmission Pricing Zone. More specifically, the competitive scope of the  
6 DZTM Project to be owned by ATXI assets are:

- 7 (1) Denny – Zachary 345 kV circuit and structures;
- 8 (2) Zachary to Maywood segment 345 kV circuit and structures; and,
- 9 (3) Zachary – Thomas Hill 345 kV circuit only.<sup>10</sup>

10 ATXI is not requesting a CCN for the Zachary substation. Stating in footnote 7 of  
11 the Application:

12 The scope of work at ATXI's Zachary Substation is excluded from the CCN  
13 request because it is not construction of a new substation. The upgrades at  
14 the existing ATXI Zachary Substation have been described for transparency  
15 and because their cost is included in the costs of the Phase 2 DZTM Project  
16 and the Program, but the upgrades do not require a new CCN as they  
17 represent upgrades to an existing certificated facility and do not constitute  
18 construction of a new asset.

19 As the Zachary substation was not included in the Application, Staff's recommendation to  
20 grant a CCN in this case does not include the Zachary substation.<sup>11</sup> Staff notes that it is not  
21 clear whether or not the work planned for the Zachary fits in the exemptions in 20  
22 CSR 4240-20.045(1)(C).

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<sup>10</sup> Application, page 3, footnote 2.

<sup>11</sup> Commission rule 20 CSR 4240-20.045(1)(B) states "[c]onstruction means: 1. Construction of new asset(s); or 2. The improvement, retrofit, or rebuild of an asset that will result in a ten percent (10%) increase in rate base as established in the electric utility's most recent rate case."

1           ATXI and MJMEUC have executed a Joint Ownership Agreement (“JOA”). As a part of  
2 the JOA, a list of specific assets to be transferred to MJEUC will be developed. Staff recommends  
3 ATXI file the final JOA as a compliance condition.<sup>12</sup> Staff further recommends that ATXI shall  
4 file the specific impact, if any, of the proposed transfer of the assets to be constructed on the tax  
5 revenues of the political subdivisions in which the proposed structures, facilities, or equipment are  
6 located.<sup>13</sup> The Joint Ownership Agreement, Schedule A, may satisfy this reporting condition if it  
7 additionally identifies the political subdivisions in which the proposed structures, facilities, or  
8 equipment are located.

9           With the transfer of interest in certain assets, MJMEUC will be a minority owner; however,  
10 ATXI will operate the assets. Additionally, MJMEUC will cover 49% of the ongoing operations  
11 and maintenance costs associated with assets in which it has an interest.<sup>14</sup> Staff recommends the  
12 Commission grant ATXI’s request to transfer a 49% undivided interest in the DZTM Project assets  
13 to MJMEUC.

14           ATXI’s partnership with Ameren Missouri relates to rebuilding approximately 44 miles  
15 of 161 kV line to a double circuit 161 kV/ 345 kV line.<sup>15</sup> ATXI will own, operate, and maintain  
16 the support structures and the 345 kV circuit while Ameren Missouri will continue to own, operate,  
17 and maintain the 161 kV line.<sup>16</sup> ATXI and Ameren Missouri will enter into a Joint Use Agreement  
18 (“JUA”) detailing each entity’s responsibilities regarding construction, ownership, operation, and  
19 maintenance.<sup>17</sup> Staff recommends ATXI file the final JUA as a compliance condition.

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<sup>12</sup> ATXI has agreed to this condition in paragraph 49 of the Application.

<sup>13</sup> 20 CSR 4240-10.105(F).

<sup>14</sup> Application, paragraph 51.

<sup>15</sup> Application, page 3.

<sup>16</sup> Application, page 3.

<sup>17</sup> Direct Testimony Nick Rudis, page 9, line 12; page 16, lines 13-18; and page 17, lines 1-3.

1 ATXI represents the total cost for the Phase 2 Project, including transmission line and  
2 substation, is approximately \$490.6 million.<sup>18</sup> The total expected cost to ATXI is estimated  
3 at \$313.7 million.<sup>19</sup> While Staff does not have all details related to the detailed scoping and cost  
4 estimation completed for Phase 2, ATXI provided (for the competitively bid portion of the Phase  
5 2 Project) \*\* [REDACTED]

6 [REDACTED] \*\*. Further, ATXI provided discussion in  
7 Nick Rudis' Direct Testimony<sup>20</sup> regarding the process Ameren Services took to develop the cost  
8 estimates using quantity takeoffs from its scoping reviews, extrapolating historical unit costs, and  
9 adjusting for known factors. Additionally, Ameren Services estimated a risk-based contingency.  
10 Mr. Rudis' discussion and the supporting information available to Staff is in line with  
11 industry practices.

12 The table below provides a further breakdown of estimated costs based on the information  
13 available to Staff as of the date of this report:

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<sup>18</sup> Page 7, Table: Program Costs in Thousands of Dollars, Greg Gudeman's Direct Testimony.

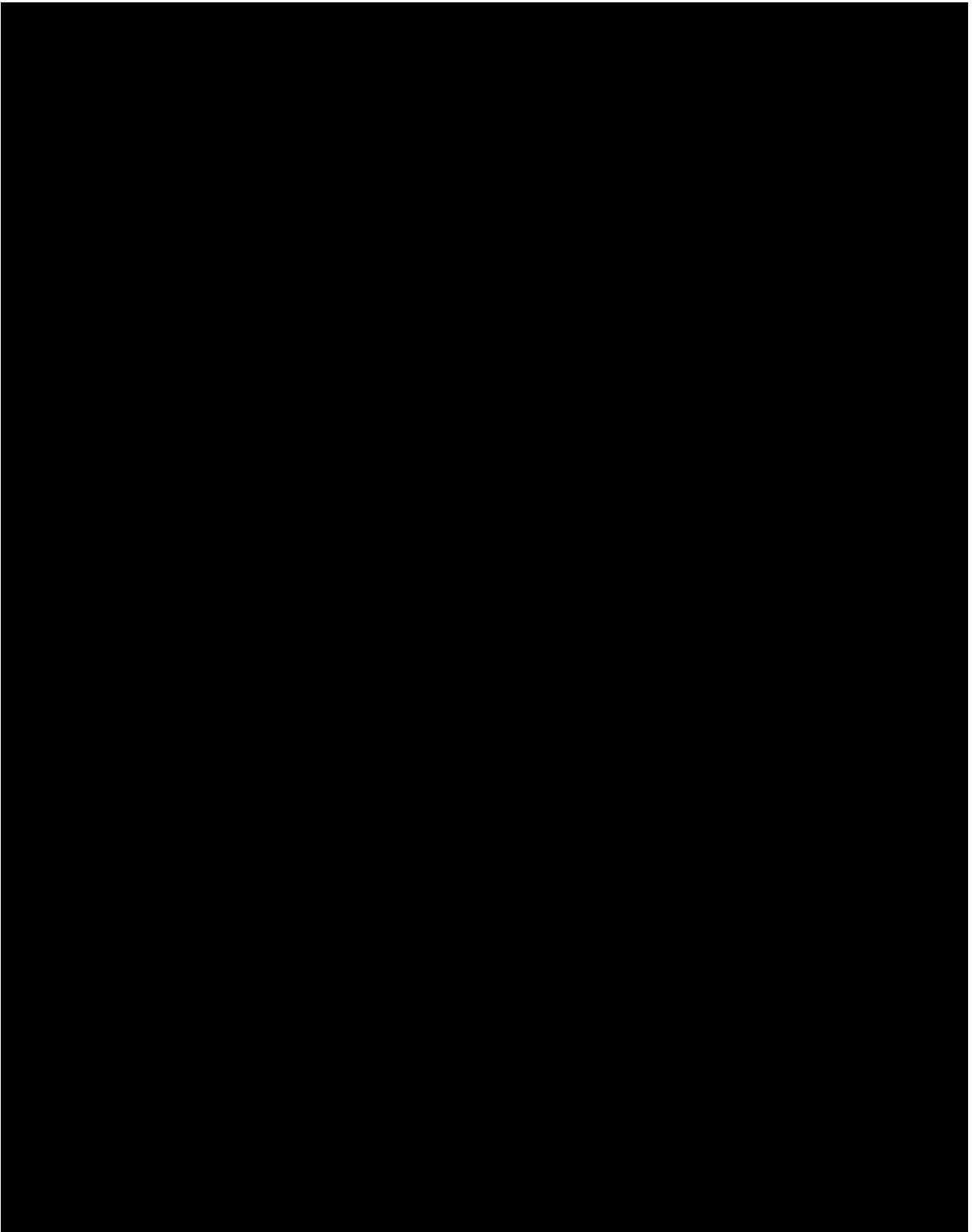
<sup>19</sup> Direct Testimony of Nick Rudis, page 25, lines 2-3.

<sup>20</sup> Nick Rudis Direct Testimony, page 24, lines 2-18.



1

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ATXI has included within its Application and Direct Testimony the minimum filing requirements of Commission Rules 20 CSR 4240-2.060, 20 CSR 4240-20.045(6), and 20 CSR 4240-10.105. Attachment A includes the filing requirements and Staff's review.

Staff recommends additional reporting requirements which can be found within the list of conditions located in the Recommended Conditions section below.

Finally, ATXI requests a waiver from the following Commission rules:

- 20 CSR 4240-20.105 – rate schedule filing requirements;
- 20 CSR 4240-10.145 – annual reporting requirement;
- 20 CSR 4240-3.175 – depreciation study requirement; and,
- 20 CSR 4240-3.190 – reporting requirements for electric utilities and rural electric cooperatives.

Staff supports the Commission granting ATXI a waiver of the above-listed rules because ATXI does not have retail customers in Missouri and the above list of rules are not applicable to ATXI.

*Staff Witness: Claire M. Eubanks, PE*

### **III. Five Tartan Criteria**

#### **Whether there is a need for the facilities and service**

The primary purpose of the Denny – Zachary – Thomas Hill – Maywood (“DZTM”) Project is to complete Phase 2 of Missouri's jurisdictional portion of MISO's Long-Range Transmission Planning (“LRTP”) Tranche 1 Portfolio. In evaluating whether a project is needed under the Tartan factors, Staff considers the following questions:

- (a) Is the project both important to the public convenience and desirable for the public welfare?
- (b) Or, is the project effectively a necessity because the lack of the service is such an inconvenience?

1                   If the answer is yes for either of these questions, Staff concludes that the project is  
2 needed. Staff has concluded the CCN filed under Case No. EA-2024-0302 is effectively a  
3 necessity because the lack of the service is such an inconvenience.

#### 4 **Background**

5                   MISO is an organization that manages the electrical grid of a region including parts of 15  
6 U.S. states and the Canadian province of Manitoba. The MISO region includes a portion  
7 of Missouri.

8                   Upon noticing an increase in renewable energy being integrated into the grid, MISO  
9 conducted a Renewable Integration Impact Assessment (“RIIA”) in 2018. This assessment held a  
10 focus to “evaluate the impact of increasing amounts of wind and solar” on the grid, specifically  
11 system-wide. The study focused on being “policy and pace agnostic,”<sup>21</sup> meaning it sought to  
12 analyze the impact on the grid regardless of policy changes or the pace of renewable energy growth  
13 since MISO was unsure at the time what future policies would be and what the pace of the  
14 renewable energy integration would be.<sup>22</sup> MISO’s assessment discovered that system-wide  
15 renewable integration levels beyond 30%, with incremental transmission expansion, would cause  
16 “significant grid issues, including thermal overload issues on the Ameren system in Missouri,  
17 which degrade system performance.” But, the RIIA also found that “penetration levels of even  
18 50% or higher could be reliably achieved if MISO, Transmission Owners (“TOs”), and the states  
19 work together to develop and implement grid solutions that will support that level of  
20 renewables integration.”<sup>23</sup>

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<sup>21</sup> [20210303 RIIA Workshop Presentation](#), slide #4.

<sup>22</sup> [cdn.misoenergy.org/20210303 RIIA Workshop Recording544222.mp4](https://cdn.misoenergy.org/20210303_RIIA_Workshop_Recording544222.mp4), 8:50-9:50.

<sup>23</sup> EA-2024-0302 Application, Page 4, Paragraph 11.

1           This led MISO to begin collaborating with TOs and states to develop grid solutions called  
2 Multi-Value Projects (“MVPs”). MVPs are regional transmission projects with the goal for each  
3 project to “provide benefits in excess of costs throughout the MISO footprint or subregions with  
4 project expenses being broadly shared.”<sup>24</sup> But in order to do this, MISO needed a way to  
5 estimate how the grid would behave in the future so it developed what it calls “Series” which are  
6 groups of “forward-looking planning scenarios that provide outlooks to bridge what is known  
7 about the system today to what it could be in the future,” which it called “Futures.”<sup>25</sup> MISO  
8 collaborated with stakeholders to develop a cohort of three future-planning scenarios, which are  
9 now referred to as the Series 1 Futures. These three future-planning scenarios were named  
10 Future 1, Future 2, and Future 3. These Future scenarios “establish different ranges of economic,  
11 policy, and technological possibilities – such as load growth, electrification, carbon policy,  
12 generator retirements, renewable energy levels, natural gas price, and generation capital  
13 cost – over a twenty-year period.”<sup>26</sup>

14           Series 1 “was developed over an 18-month period beginning in mid-2019 through the end  
15 of 2020 and was the foundation of the LRTP Tranche 1 analysis, used to justify a \$10.3 billion  
16 portfolio of new transmission investments.”<sup>27</sup> Three of the developed MVPs have parts that  
17 are within Missouri’s jurisdiction, MVP 9, 10, and 11. The Orient – Denny – Fairport Project  
18 (MVP 9) crosses the border of Missouri into Iowa and the Maywood – Meredosia Project  
19 (MVP 11) crosses the border of Missouri into Illinois while the Denny – Zachary – Thomas

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<sup>24</sup> <https://www.misoenergy.org/planning/multi-value-projects-mvps/#t=10&p=0&s=Updated&sd=desc>, accessed 12/13/24.

<sup>25</sup> [MISO Futures One Pager538214.pdf](#), Page 1.

<sup>26</sup> <https://cdn.misoenergy.org/MISO%20Futures%20Summary%20Presentation538220.pdf>, Slide #2.

<sup>27</sup> Series 1A Futures Report, Page 2.

1 Hill – Maywood Project (MVP 10) is wholly within Missouri.<sup>28</sup> All three of these Projects are  
2 meant to connect to one another. The Denny – Zachary – Thomas Hill – Maywood Project  
3 (MVP 10) is the subject of this application which is named the DZTM Project or otherwise known  
4 as Phase 2 of Missouri's jurisdictional portion of MISO's Long-Range Transmission Planning  
5 (“LRTP”) Tranche 1 Portfolio.

6 A two-phase approach is being used to construct Missouri's jurisdictional portions of  
7 MVP 9, 10, and 11. Phase 1 consists of the FDIM and MMRX Projects. Phase 2 consists of the  
8 Denny – Zachary – Thomas Hill – Maywood (“DZTM”) Project. A separate CCN has been  
9 requested for the Phase 1 Projects under Case No. EA-2024-0302. In order for Missouri to receive  
10 the full anticipated benefits from MISO's LRTP Tranche 1 Portfolio, both Phase 1 and Phase 2  
11 will need to be approved by the Commission.<sup>29</sup>

## 12 **Resolve Forecasted Thermal Issues**

13 With the absence of both Phase 1 and Phase 2 Projects, MISO identified certain  
14 transmission elements, located within Missouri, that will be at risk of failure due to “Thermal  
15 Issues.”<sup>30</sup> Thermal issues, in reference to transmission elements, refers to situations where  
16 transmission lines or equipment become overloaded due to high levels of electrical current and  
17 become overheated. This can lead to reduced efficiency and failures.

18 These thermal issues were discovered by studying the grid using the Future 1 planning  
19 scenario which uses the most modest assumptions out of the three planning scenarios in Series 1.<sup>31</sup>

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<sup>28</sup> Application, Page 9 & Page 10, Figure 6-17

<sup>29</sup> Application, Page 1-2

<sup>30</sup> Justin Davies Direct Testimony, Page 21, Lines 2-15

<sup>31</sup> MTEP21. Page 21.

Future 1 assumes load growth over the 20-year period to be consistent with current trends and assumes that the footprint will develop in line with “100% of utility IRPs and 85% of utility announcements, state mandates, goals, or preferences.”<sup>32</sup> Studying Future 1 would highlight issues that are anticipated to occur within the MISO region if the demand for electricity remains consistent with current trends.

Figure 1 displays transmission elements forecasted to have thermal issues that were identified by MISO which the LRTP Tranche 1 portfolio relieved. The element was considered relieved “if its worst pre-project loading was greater than 95% of its monitored Emergency rating, its worst post project loading was less than 100% of its monitored Emergency rating, and the worst loading decreased by greater than 5% following the addition of the project.”<sup>33</sup> The elements along with their reduction in loading are displayed in the table below:

Figure 1 Transmission elements with forecasted thermal issues that the Tranche 1 Projects would resolve <sup>34</sup>

Monitored Facility	Area	% Loading	
		Base + West LRTP*	+ IA to MI Project + MO Projects
Overton 345/161 kV Transformer	AMMO	109	97
Overton – Sibley 345 kV Ckt. 1	AMMO	102	88
Huntsdale – Overton 1 161 kV Ckt. 1	AMMO	101	91
California 161 kV Bus 1 – Overton 2 161 kV Ckt. 1	AMMO	98	88
Huntsdale – Perche Creek 161 kV Ckt. 1	CWLD	97	87
McBaine Bus #2 – McBaine Tap 161 kV Ckt. 1	AMMO	97	85
Maurer Lake 161 kV Bus 1 – Carrollton 161 kV Ckt. 1	AMMO	96	70
California 161 kV Bus	AMMO	95	85

<sup>32</sup> MISO Futures Summary Presentation.

<sup>33</sup> MTEP21, Page 44.

<sup>34</sup> Direct Testimony of Justin Davies, Page 22, Lines 1.

## **Increase Transfer Levels Across MISOs Region**

In addition to resolving forecasted thermal issues, MISO stated that the LRTP Tranche 1 Portfolio can “increase transfer levels from East-West/West-East.”<sup>35</sup> MISO is specifically speaking of the transfer levels across the MISO region and not exclusively in Missouri. Generally, the benefits of increasing the transfer levels include:

- allowing the grid to better handle the increase in renewable energy generation since many renewable energy sources are variable and intermittent in nature;
- allowing the grid to transfer electricity more efficiently by reducing congestion which in turn optimizes the usefulness of the energy generated;
- allowing access to other energy generation sources across the region; and,
- potentially helping to reduce the risk of power outages due to the challenges associated with balancing the supply and demand of electricity using limited transfer capability.

In addition to the Tranche 1 Projects located in Missouri, there are also Tranche 1 Projects that will span from Iowa to Michigan called the East Central Corridor Solution. Using the Future 1 scenario, MISO determined that the introduction of the East Central Corridor Solution could increase the MISO region East-West/West-East transfer levels from 1,640 megawatts (“MW”) to 3,773 MW. The addition of the Missouri projects would further increase the transfer level from 3,773 MW to 6,000 MW.<sup>36</sup> This indicates that the Missouri jurisdictional projects could add a significant portion to the MISO region’s transfer capacity that it would otherwise lack with the absence of the Missouri jurisdictional projects, which is beneficial to Missouri.

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<sup>35</sup> MTEP21 Page 46.

<sup>36</sup> MTEP21 Page 46.

## **Improve Grid Resiliency During Extreme Weather Events**

Along with the benefit of increased transfer levels, ATXI states that the LRTP Tranche 1 Portfolio can improve the region's ability to respond to extreme weather events.<sup>37</sup> Although weather events were not initially one of the major reasons for constructing the LRTP Tranche 1 Portfolio of projects, the increase in transmission lines does provide additional routes of energy transfer in the case of a severe weather event. MISO emphasized this need in MISO's "The February Arctic Event, February 14-18, 2021," report saying "[t]he challenges faced during this extreme weather event, including transmission emergencies and generator outages, are a stark reminder of the need to continue transforming to ensure the MISO Region is ready for the current and future challenges facing the industry."<sup>38</sup>

## **Other Projects**

The Commission approved Invenergy's Grain Belt Express Project ("GBX") and this project was not included in MISO's analysis when it developed the LRTP Tranche 1 Portfolio. Invenergy filed a complaint under FERC Docket No. EL22-83-000 claiming that the GBX Project should have been included in MISO's base assumptions for the LRTP Tranche 1 Portfolio.

In response to Invenergy's complaint, MISO stated that the GBX Project was excluded from MISO's analysis because the GBX Project did not meet the requirements set forth in MISO's Tariff in order to be included in the base case assumptions for the LRTP Tranche 1 Portfolio. MISO stated that "[t]hese requirements ensure that only MHVDC<sup>39</sup> proposals that attained a

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<sup>37</sup> Direct Testimony of Justin Davies, Page. 23.

<sup>38</sup> MISO, The February Arctic Event Report, Page 5

<sup>39</sup> MHVDC is "Merchant High Voltage Direct Current"



1 sufficient level of certainty are included in MISO’s models to avoid distortions in the MTEP<sup>40</sup>  
2 analyses and cost shifts to MISO loads.”<sup>41</sup>

3 MISO completed its LRTP Tranche 1 portfolio and it was approved by the MISO board  
4 prior to the GBX Project obtaining the necessary requirements to be included in MISO’s base  
5 assumptions for the LRTP Tranche 1 Portfolio.<sup>42</sup> In addition to the LRTP Tranche 1 Portfolio,  
6 MISO stated that “key portions of the LRTP Tranche 2 process had already been concluded by  
7 the time the GBX TCA<sup>43</sup> was accepted by FERC in February 2024. MISO has no ability to go  
8 backwards in the LRTP planning process and make changes to the initial LRTP Tranche 2 models  
9 to accommodate the changing status of the GBX Line Project without significant rework and delay,  
10 which will affect other stakeholders.”<sup>44</sup> However, MISO plans on creating a sensitivity analysis  
11 to determine the impact of the GBX Project on the Tranche 2 portfolio and will include the GBX  
12 Project moving forward.<sup>45</sup>

13 Additionally, on March 13, 2025, MISO’s Independent Market Monitor (“IMM”),  
14 Potomac Economics Inc. (“Potomac Economics”) intervened in Invenenergy’s complaint with FERC  
15 stating that it had “substantial concerns” with the amount of independent oversight MISO has had  
16 in its LRTP process which Potomac Economics states have been “largely unaddressed by  
17 MISO”<sup>46</sup>. As MISO states on its website, “Potomac Economics continuously receives data that it  
18 uses to evaluate the performance of the markets and identify conduct by market participants or

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<sup>40</sup> MTEP is “MISO Transmission Expansion Planning”

<sup>41</sup> FERC 20240423-5030 EL22-83-000, Page 3.

<sup>42</sup> FERC 20240423-5030 EL22-83-000, Pages 3-4.

<sup>43</sup> TCA is “Transmission Connection Agreement”

<sup>44</sup> FERC 20240423-5030 EL22-83-000, Page 13 of Doner Affidavit.

<sup>45</sup> FERC 20240423-5030 EL22-83-000, Page 16 of Doner Affidavit.

<sup>46</sup> FERC 20250313-5220 EL22-83-000, Page 3.

1 MISO that may compromise the efficiency or distort the outcomes of the markets.”<sup>47</sup> Potomac  
2 Economics states that the problem with ignoring the GBX project is that MISO has “likely both  
3 overstated MISO’s future transmission needs and overstated the benefits of Tranches 1 and 2.1.”<sup>48</sup>

4 But, MISO submitted an answer to Potomac Economics, filed on March 28, 2025, stating  
5 that MISO disagreed that the benefits of Tranches 1 and 2.1 are overstated and that “IMM provided  
6 no analysis to support this brash claim.”<sup>49</sup> MISO also stated that claims regarding MISO  
7 neglecting to address Potomac Economics’ concerns are inaccurate, stating that it provided  
8 “multiple responses to IMM feedback both directly and indirectly, conducted additional resource  
9 expansion scenarios to address specific IMM concerns, provided opportunities for the IMM to  
10 present to stakeholders and the MISO Board, as well as provided written responses to the IMM’s  
11 comments.”<sup>50</sup> The Invenergy complaint is on-going and more information will likely come to the  
12 surface as the case continues forward. The Invenergy complaint is mentioned further in Staff  
13 Witness J Luebbert’s section of this report. While Staff does view this as valuable information for  
14 the Commission to consider when determining whether or not to approve the overall CCN, for this  
15 portion of the Report in evaluation of the need of the project, Staff believes the project is still  
16 effectively a necessity for the above-mentioned reasons.

## 17 **Conclusion**

18 In conclusion, the DZTM Project is needed to complete Phase 2 of the Missouri  
19 jurisdictional portions of MISO’s LRTP Tranche 1 Portfolio. MISO’s LRTP Tranche 1 Portfolio  
20 is an initiative aimed at benefiting the entire MISO region which includes a portion of Missouri.

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<sup>47</sup> [MISO Independent Market Monitor, accessed 5/29/2025](#)

<sup>48</sup> [MISO Independent Market Monitor, accessed 5/29/2025](#)

<sup>49</sup> FERC 20250328-5374 EL22-83-000, Page 4

<sup>50</sup> FERC 20250328-5374 EL22-83-000, Page 4

MISO has shown through extensive study that the Tranche 1 portfolio, including the DZTM Projects, will resolve forecasted thermal issues in Missouri, increase transfer levels across MISO's region, and improve grid resiliency during extreme weather events.

The Commission should be made aware that the presence of the LRTP Tranche 1 Portfolio Projects in Missouri could influence the anticipated usefulness of the GBX Project from Missouri's perspective and alternatively the presence of the GBX Project could influence the anticipated usefulness, from Missouri's perspective, of the LRTP Tranche 1 Portfolio Projects located within Missouri's jurisdiction.

For these reasons, Staff recommends the Commission find that the projects are effectively a necessity because the lack of the service is such an inconvenience.

*Staff Witness: Malachi Bowman*

**Whether the applicant is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project**

ATXI is an affiliate of Ameren Corporation (Ameren Corp.), and obtained a Certificate of Authority to conduct business in the State on August 1, 2012.<sup>51</sup> The Commission has previously granted CCN's, dating back to 2015, that were developed as part of the MISO's MVPs in Missouri and Illinois, stemming from MISO's LRTP initiative to develop an updated regional transmission trunk-line – also referred to as a “transmission backbone”. Some previous examples of ATXI transmission line projects in Missouri include:

- Limestone Ridge project in collaboration with the Wabash Valley Power Alliance;
- Mark Twain Transmission Project; and,
- Missouri component of the Illinois Rivers Project.

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<sup>51</sup> ATXI was first recognized by the Commission as a public utility in File No. EA-2015-0145.

1 ATXI will utilize Ameren Services for construction management and supervision of the  
2 ATXI – Phase 2 projects. ATXI witness Nick Rudis provides further detail about the construction  
3 management, operation, and maintenance of the Phase 2 projects in his Confidential Direct  
4 Testimony on pages 33-42, including a discussion of the Ameren Services documented procedures  
5 in the event of an unplanned outage. ATXI provided Staff with JUA’s specific to each entity’s role  
6 between ATXI and Ameren Services; ATXI and MJMEUC; and, Ameren Services, Northeast  
7 Missouri Electric Cooperative, Inc. (Northeast Power), and Associated Electric Cooperative, Inc.  
8 (“AECI”). Each JUA was reviewed by Staff. The various JUA’s detail each entity’s obligations  
9 regarding ownership, operation, repair, vegetation management, routine patrols, etc., and have  
10 been reviewed by Staff.<sup>52</sup> Staff recommends the Commission order ATXI to file the final JUAs  
11 with the Commission in this case within 30 days of executing the agreements.

12 Phase 2 of the Northern Missouri Grid Enhancement Project is similar to the type of  
13 infrastructure that was built as part of the Mark Twain Transmission Project and Illinois Rivers  
14 Project by ATXI (i.e., construction of 345 kV transmission lines). Given the resources and  
15 construction expertise ATXI had available to construct these two similar and recent projects, Staff  
16 concludes that ATXI is qualified to construct, install, own, operate, maintain, and otherwise  
17 control and manage the Project.

18 *Staff Witness: Donald Fontana, PE*

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<sup>52</sup> EA-2025-0087 ATXI Rudis\_Schedule NR-D3 CONFIDENTIAL FINAL; ATXI Rudis\_Schedule NR-D4 CONFIDENTIAL FINAL; ATXI Rudis\_Schedule NR-D6 CONFIDENTIAL FINAL.

**Whether the applicant has the financial ability for the undertaking**

Considering ATXI and Ameren Corp's financial capacity, the Applicant has the financial ability for the requested CCN.<sup>53</sup>

ATXI estimates the total cost to construct the Program, including the Allowance for Funds Used During Construction ("AFUDC"), to be \$611.1 million, which comprises \$120.5 million for the Phase 1 Projects and \$490.6 million for the Phase 2 Project.<sup>54</sup> As noted above, prior to being placed in-service, ATXI will transfer a 49% interest in the FDIM Project and a 49% interest in the competitive portion of the DZTM Project to MJMEUC, leaving 51% to ultimately be funded by ATXI long-term, or \$397.9 million.<sup>55</sup> ATXI is targeting an in-service date for all Phase 1 facilities by June 2028 and for all Phase 2 facilities by December 2029.<sup>56</sup> The total expected cost of the Program that ATXI will need to finance during construction is approximately \$568 million.<sup>57</sup> However, MJMEUC will own 49% of FDIM and the competitive portion of DZTM once these Projects are complete, which will reduce ATXI's long-term financing of the Program to \$397.9 million.<sup>58</sup> During construction, ATXI will finance the initial capital cash flow requirements with available cash on hand, equity in the form of retained earnings or short-term borrowings under Ameren's Utility Money Pool arrangement up to the \$300 million limit, while maintaining the targeted 60% equity ratio.<sup>59</sup> Over time, as the level of short-term borrowings

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<sup>53</sup> Footnote 1, The Application. While the DZTM Project includes upgrades to ATXI's Zachary Substation, that work is not part of the formal CCN.

<sup>54</sup> Page 7, Table: Program Costs in Thousands of Dollars, Greg Gudeman's Direct Testimony.

<sup>55</sup> Page 6, lines 11-15, Greg Gudeman's Direct Testimony.

<sup>56</sup> Page 7, lines 7-8, Greg Gudeman's Direct Testimony. Paragraph 40 in the Application, the Phase 2 DZTM Project by March 2027 and anticipates that the DZTM Project will be in service by October 2029.

<sup>57</sup> Page 7, lines 5-6 Greg Gudeman's Direct Testimony.

<sup>58</sup> Page 8, lines 3-5, Greg Gudeman's Direct Testimony.

<sup>59</sup> Page 8, lines 7-9, and Page 9, lines 11-14 and 17-18, Greg Gudeman's Direct Testimony.

1 increase, ATXI will replace short-term borrowings with a permanent source of capital that includes  
2 a balanced blend of long-term debt and common equity.<sup>60</sup> ATXI's capital structure may be  
3 periodically rebalanced with infusions of equity to maintain a long-term target capital structure  
4 of 60% equity and 40% debt.<sup>61</sup>

5 For 2024 through 2028, Ameren's cumulative capital expenditures are projected to range  
6 from \$21.0 billion to \$22.8 billion.<sup>62</sup> ATXI's forecasted capital expenditures for the 2024–2028  
7 period total approximately \$2.5 billion.<sup>63</sup> S&P and Moody's have both rated Ameren Corp. as  
8 investment grade. S&P assigned Ameren Corp. a rating of "BBB+," while Moody's rated them  
9 as "Baa1."<sup>64</sup> Furthermore, ATXI demonstrates financial strength, as evidenced by its Moody's  
10 A2 issuer credit rating, based in large part on the supportive FERC regulatory framework and the  
11 strength of ATXI's credit metrics.<sup>65</sup>

12 Additionally, to investigate the financial impact of the Projects, Staff conducted pro forma  
13 analysis using financial ratios such as Debt to Earnings before Interest, Taxes, and  
14 Depreciation/Amortization ("EBITDA") and Funds from Operations ("FFO") to Debt. As shown  
15 in Table 1, Staff found that there is no significant change in Ameren Missouri's financial risk  
16 profile due to the Projects.<sup>66</sup>

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<sup>60</sup> Page 8, lines 9-11, Greg Gudeman's Direct Testimony.

<sup>61</sup> Page 9, lines 4-6, Greg Gudeman's Direct Testimony.

<sup>62</sup> SEC Form 10-K, Ameren Corporation, filed February 29, 2024.

<sup>63</sup> Staff Data Request No. 0004.

<sup>64</sup> S&P Capital IQ Pro, retrieved January 18, 2025.

<sup>65</sup> Pages 8-10, Greg Gudeman's Direct Testimony.

<sup>66</sup> S&P's Ratings Services, RatingsDirect, "Criteria Methodology: Business Risk/Financial Risk Matrix Expanded"

**Table 1. ATXI Financial Ratios<sup>67</sup>**

	As of December 31, 2023			Pro Forma		
FFO / Debt (%)	**		**	**		**
Debt / EBITDA (x)	**		**	**		**
Debt / Capital (%)	**		**	**		**

ATXI is a transmission-only company with a low business risk profile. ATXI will only need to finance 51% of the final costs of FDIM and the competitive portion of DZTM, which lowers the total amount ATXI will need to finance to only \$397.9 million.<sup>68</sup> Considering the proposed cost, which is less than 2% of Ameren Corp.'s and ATXI's capital expenditure over five years, and the financial impact of the projects, it is reasonable to conclude that ATXI has the financial ability to own, operate, and maintain the Project.

*Staff Witness: Seoung Joun Won, PhD*

**Whether the proposal is economically feasible**

On pages 16 and 17 of Dr. Todd Schatzki's Direct Testimony, he states that the Project is feasible because:

- FERC has reviewed and approved the revenue requirement for recovery through the MISO Tariff, thus providing ATXI with a means to recover Phase 2 DZTM Project development and operation costs;
- ATXI has provided a plan to finance the Phase 2 DZTM Project, demonstrated the ability to finance the Phase 2 DZTM Project, and indicated its willingness to finance the Phase 2 DZTM Project;
- The Phase 2 DZTM Project lowers wholesale market prices and costs of production, creating a more efficient wholesale market and greater access for Missouri to renewable and other energy sources from throughout the MISO footprint, in turn reducing costs for electric customers in Missouri.

<sup>67</sup> Staff's Data Request Nos. 0001 and 0002.

<sup>68</sup> Page 11, lines 12-14, Greg Gudeman's Direct Testimony.

1 This testimony is nearly identical to the Phase 1 Projects discussed in their application in  
2 Case No. EA-2024-0302. As Staff stated in that case, while ATXI's first point is about economic  
3 feasibility, the second concerns financial ability, and the third is a public interest factor of the  
4 Tartan criteria.

5 Like the prior projects in Case No. EA-2024-0302, the proposed Project has been  
6 approved as part of the 2021 MISO Transmission Expansion Plan. Since the filing in Case  
7 No. EA-2024-0302, Staff has become aware that MISO's IMM, Potomac Economics, filed  
8 comments and a motion to intervene in FERC Docket No. EL22-83-000. The IMM alleges that  
9 ignoring the GBX project "likely both overstated MISO's future transmission needs and overstated  
10 the benefits of Tranches 1 and 2.1."<sup>69</sup> While the IMM continued to allege that the benefit-cost  
11 ratio to Tranche 2.1 was less than 0.4, no estimate was provided for Tranche 1, which includes  
12 ATXI's proposed projects in this case. Staff would also note that on March 6, 2025, Missouri  
13 Attorney General Andrew Bailey sent a letter to the Department of Government Efficiency urging  
14 them "...to immediately investigate and cancel federal funding for the nearly \$5 billion in waste  
15 from the GBE..."<sup>70</sup> It is unclear what impact this may have on the GBE project, and as Invenergy  
16 has not sought intervention in this case, Staff does not have information about Invenergy's analysis  
17 on ATXI's proposed Projects in particular.

18 Additionally, on March 28, 2025, MISO responded to the IMM in FERC Docket  
19 No. EL22-83-000. MISO disputes the claims made by the IMM above concerning the benefit-cost  
20 ratio. Specifically, MISO stated that its sensitivity analysis showed no change to the MISO  
21 Tranche 2.1 projects should the Grain Belt Express be included. MISO also stated that reopening

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<sup>69</sup> Motion to Intervene and Comments of Potomac Economics, Ltd. on Mississippi Public Service Commission. et al.'s Motion for Expedited Review re Invenergy Transmission LLC's 08/08/2022 Complaint in FERC Docket No. EL22-83. p. 3

<sup>70</sup> Bailey, Andrew. "Re: Grain Belt Express." March 6, 2025. [2025.03.06-Letter-to-DOGE-GBE.pdf](#) (14MAR25).



1 the LRTP Tranche 1 or Tranche 2.1 base modeling process, which would violate its tariff, could  
2 result in members of MISO, including Ameren Missouri, having to pay for upgrades that would  
3 be needed to reliably interconnect the GBX Line to the MISO Transmission System.<sup>71</sup>

4 In summary, the benefit cost ratio of the MISO Tranche 1 Projects for Missouri, which  
5 includes ATXI's proposed Projects, is 3.0 to 4.2.<sup>72,73</sup> While Staff has concerns that the benefits of  
6 MISO's Tranche 1 projects are overstated, none of that analysis is specific to ATXI's proposed  
7 Projects. Staff lacks the resources to properly evaluate alternative resource solutions to see if the  
8 improvement justifies the cost to MISO Zone 5 customers. However, Staff agrees that the benefits  
9 of the proposed Projects to ATXI likely exceed ATXI's costs because the Projects have been  
10 approved by FERC for recovery through the MISO Tariff.

11 *Staff Witness: J Luebbert*

### 12 **Whether the proposal is in the Public Interest**

13 Staff's public interest assessment in this case involves the evaluation of all other Tartan  
14 Criteria: need for the project, its economic feasibility, the qualifications and financial ability of the  
15 entity requesting a CCN. Staff considers the evaluation of the separate Tartan criteria and whether,  
16 on balance, the project promotes the public interest. Additionally, Staff reviews the project and  
17 whether there are any considerations not covered by the other Tartan Criteria that should be  
18 considered in the public interest assessment. In this case, these considerations<sup>74</sup> include ATXI's

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<sup>71</sup> MISO's Motion for Leave to Answer and Answer of the Midcontinent Independent System Operator, Inc., 3/28/2025 in FERC Docket No. EL22-83. p. 14

<sup>72</sup> MISO noted that the low and high range of the benefit/cost ratios by Cost Allocation Zone are driven by changing two assumptions in the 20-year present value analysis: 1) increasing the Value of Lost Load ("VOLL") from \$3,500/MWh (low) to \$23,000/MWh (high); and increasing the price of carbon from \$12.55/ton (low) to \$47.80/ton (high).

<sup>73</sup> MTEP21 Report Addendum: Long Range Transmission Planning Tranche 1 Executive Summary, Figure 3, Page 4. [MTEP21 Addendum-LRTP Tranche 1 Report with Executive Summary625790.pdf](#) (25NOV2024)

<sup>74</sup> In EA-2024-0302 Staff responded to ATXI's testimony on economic development, for the sake of brevity, Staff maintains its argument in EA-2024-0302.

1 routing study, public engagement, and proposed route selection. Additionally, Staff provides an  
2 overview of consumer comments received by the Public Service Commission and at the local  
3 public hearing (“LPH”). Finally, Staff recommends a number of conditions to the granting of  
4 the CCN.

## 5 **Routing Studies and Public Engagement**

6 Staff reviewed testimony and exhibits from ATXI witnesses that conducted the routing  
7 study and public engagement components for the Phase 2 Denny-Zachary-Thomas Hill-Maywood  
8 (Phase 2 - DZTM) portion of the ATXI Northern Missouri Grid Transformation project.<sup>75</sup>

## 9 **Routing Study Overview**

10 ATXI used HDR, Inc. (“HDR”) as the primary routing consultant, to conduct their overall  
11 routing study, and to determine potential environmental impacts of the various study routes. That  
12 information was then used to identify and propose the most favorable routes to pursue in a more  
13 detailed manner for the Phase 2 DZTM projects. ATXI also utilized work from their routing  
14 consultant for Phase 1 of the project, TRC Companies, Inc. (“TRC”), to complete the initial stage  
15 of the routing study, which was then expanded upon by HDR.<sup>76</sup>

16 ATXI witness Dan Schmidt provided testimony on various components of the HDR route  
17 study, and described the criteria that was used to determine the final route selection for each of the  
18 three segments of this project. Witness Schmidt is employed by HDR, and stated in his direct  
19 testimony that the goal of the routing study was to identify and compare potential transmission

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<sup>75</sup> ATXI witness Dan Schmidt submitted testimony and exhibits for the routing study, and ATXI witness Lea Dettmers submitted testimony and exhibits for the public engagement components.

<sup>76</sup> Note: In the June 2, 2023, ATXI proposal to MISO, TRC served as the Routing Consultant as referenced on Pg. 84, Sec. 3.B.1 of the Confidential Attachment to DR 14.

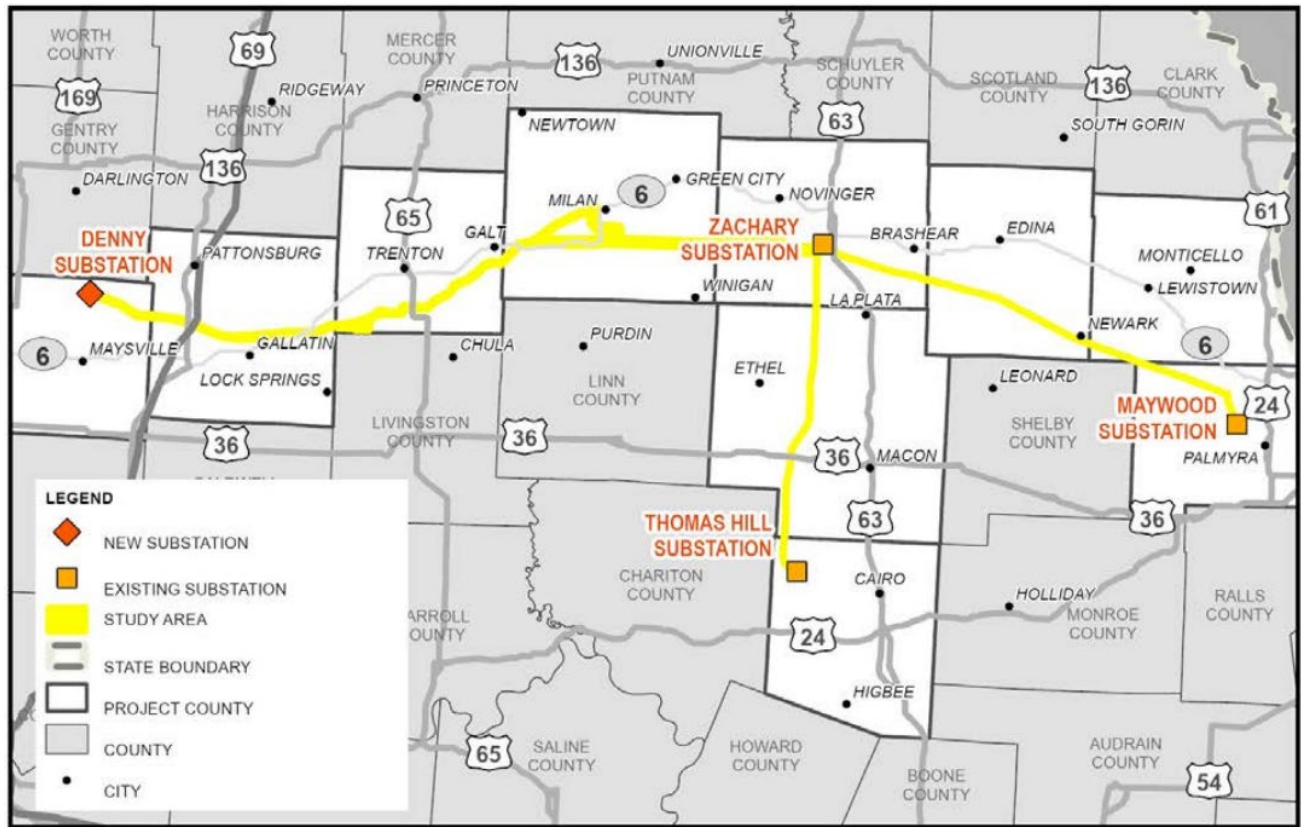
1 line routes and to minimize the overall impacts to land use, ecological, and cultural features, as  
2 much as reasonably possible, while also considering economic impacts and the technical feasibility  
3 of various potential routes.<sup>77</sup>

4 MISO used a competitive bid process for development of various segments of the Phase 2  
5 DZTM project.<sup>78</sup> Ameren and other potential bidders were required to submit their proposed  
6 routes to MISO for judging against the other route submittals. The initial route selection process  
7 that was used for submittal to MISO by ATXI and TRC was done in stages. Starting with a large  
8 study area, ATXI and TRC used what they termed “relevant constraint and opportunity criteria”  
9 to begin reducing the overall study area into a series of approximate routes, also referred to as  
10 corridors. As the study and evaluation progressed, the various corridors were reduced into routes.  
11 Next, the various routes were compared, and what was determined as the best option through  
12 quantitative and qualitative review emerged. ATXI and TRC arrived at two route proposals  
13 through the general route development process. Due to the fact that they were competing against  
14 other bidders, there were no stakeholder and landowner engagement efforts carried out for the  
15 general phase of the competitive process that MISO used. Award of the Phase 2 DZTM project  
16 ultimately went to ATXI. The routes approved by MISO that evolved into the Northern Missouri  
17 Phase 2 Study Area are shown below:

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<sup>77</sup> See EA-2025-0087 Direct Testimony of Dan Schmidt, and, ATXI Schmidt\_Schedule DS-D1 FINAL.

<sup>78</sup> See EA-2025-0087 Direct Testimony of Nick Rudis, pages 13 and 14, lines 15-18, and lines 1-3 for a description by line segment.



Northern Missouri Phase 2 Study Area<sup>79</sup>

The development group for the next phase of the project's routing study was composed of HDR's routing staff and its GIS mapping staff, as well as ATXI's transmission line engineering, project management, environmental compliance management, construction management, public outreach, and vegetation management, in addition to its land and Right-of-Way groups. The route development effort conducted by these groups transitioned from identifying a study area into performing a route review of the general routes, consisting of:

- Review of existing data and collection of additional data as needed, such as locating residences on their potential route maps, updating parcel data to have more current ownership information, etc.

<sup>79</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 FINAL.pdf.

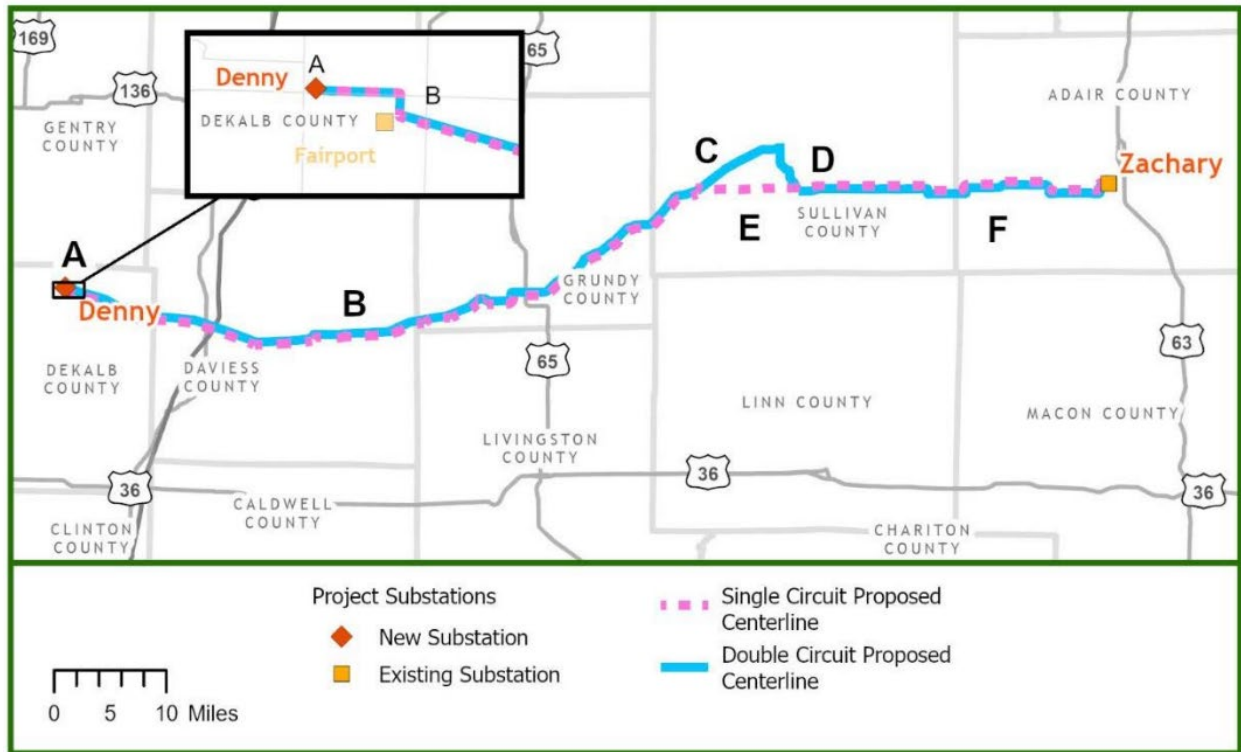
- Development of a general study area of the MISO-approved route. This allowed the study area to be shared with all stakeholders as well as the overall public. At this stage, HDR and ATXI collected feedback of the route, and verified accuracy of the data which had been gathered from the stakeholders.
- HDR and ATXI performed a more detailed study of the general route approved by MISO and identified any areas that might be affected adversely, including: homes, agricultural operations, environmentally impacted areas, etc.
- When adversely affected areas were identified, alternative routes were developed.
- Lastly, the most highly suitable overall route to be proposed for Phase 2 of the project was finalized.

ATXI and HDR broke the proposed route into three segments, which can be visualized on the route map and better detailed in the table below, denoted by the various line segments A, B, C, D, E, and F.

The preliminary Denny to Zachary segment was developed with two route options; a single circuit option (DZ-SC), and a double circuit option (DZ-DC). The proposed DZ-SC route would begin the route in a double circuit (Line Segment A) configuration from the new Denny substation for approximately 0.90 miles to a point where it would meet an existing AECI 161 kV transmission line. The proposed single circuit segment (Line Segment B) would then essentially follow an existing AECI 161 kV transmission line as a single circuit, for approximately 61.36 miles. Next (Line Segment E), it would follow a proposed 161 kV greenfield route as a single circuit, for approximately 8.68 miles, and then follow (Line Segment F) along the north side of a proposed AECI 161 kV transmission line as a single circuit, for approximately 24.81 miles to the Zachary substation.

1           The proposed DZ-DC route would run as a double circuit (Line Segment A) from the new  
2 Denny substation for approximately 0.90 miles to a point where it would meet an existing  
3 AECI 161 kV transmission line. The proposed segment (Line Segment B) would then double  
4 circuit with the existing AECI 161 kV line for approximately 61.24 miles. The proposed route  
5 (Line Segment C) would continue as a double circuit, for approximately 8.55 miles, and would  
6 require re-building the existing AECI 161 kV transmission line to a point slightly south of AECI's  
7 existing Locust Creek substation. Next, the proposed line would double circuit with AECI's  
8 proposed 161 kV transmission line (Line Segment D) for approximately 4.02 miles to a point near  
9 the intersection of State Highways 5 and 6. Finally, the proposed route (Line Segment F) would  
10 double circuit with AECI's proposed 161 kV transmission line for approximately 24.71 miles to  
11 the Zachary substation.

1



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**Denny Substation to Zachary Substation Single & Double Circuit Route Map<sup>80</sup>**

<sup>80</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, Pg. 3, ATXI Schmidt\_Schedule DS-D1 FINAL.pdf.

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Section	Length (miles)	Description
A	0.90	Double circuit from new Denny Substation to a point east of Fairport where it meets the existing AECl 161 kV line
B-SC	61.36	Single circuit proposed route would follow the existing AECl 161 kV line from just east of Fairport Substation to a point where the proposed route crosses State Highway W northeast of Humphreys, Missouri in Sullivan County.
B-DC	61.24	The proposed route would double circuit with the existing AECl 161 kV line from just east of Fairport Substation to a point where the proposed route crosses State Highway W northeast of Humphreys, Missouri in Sullivan County.
C	8.55	Double circuit proposed route that continues to rebuild the existing AECl 161 kV line northeast up to just south of AECl's Locust Creek Substation.
D	4.02	The proposed route would double circuit with AECl's proposed 161 kV line from just south of Locust Creek Substation to a point 1.30 miles east-northeast of the intersection by state highway 5 and 6 in in Township in Sullivan County
E	8.68	Single circuit greenfield proposed route that runs to the east and eliminates going up to Locust Creek Substation. Would replace Section C and D.
F-SC	24.81	Single circuit proposed route would follow the north side of AECl's proposed 161 kV line east to Zachary Substation.
F-DC	24.71	The proposed route would double circuit with AECl's proposed 161 kV line east to Zachary Substation.

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#### **Denny to Zachary Segment Description by Section<sup>81</sup>**

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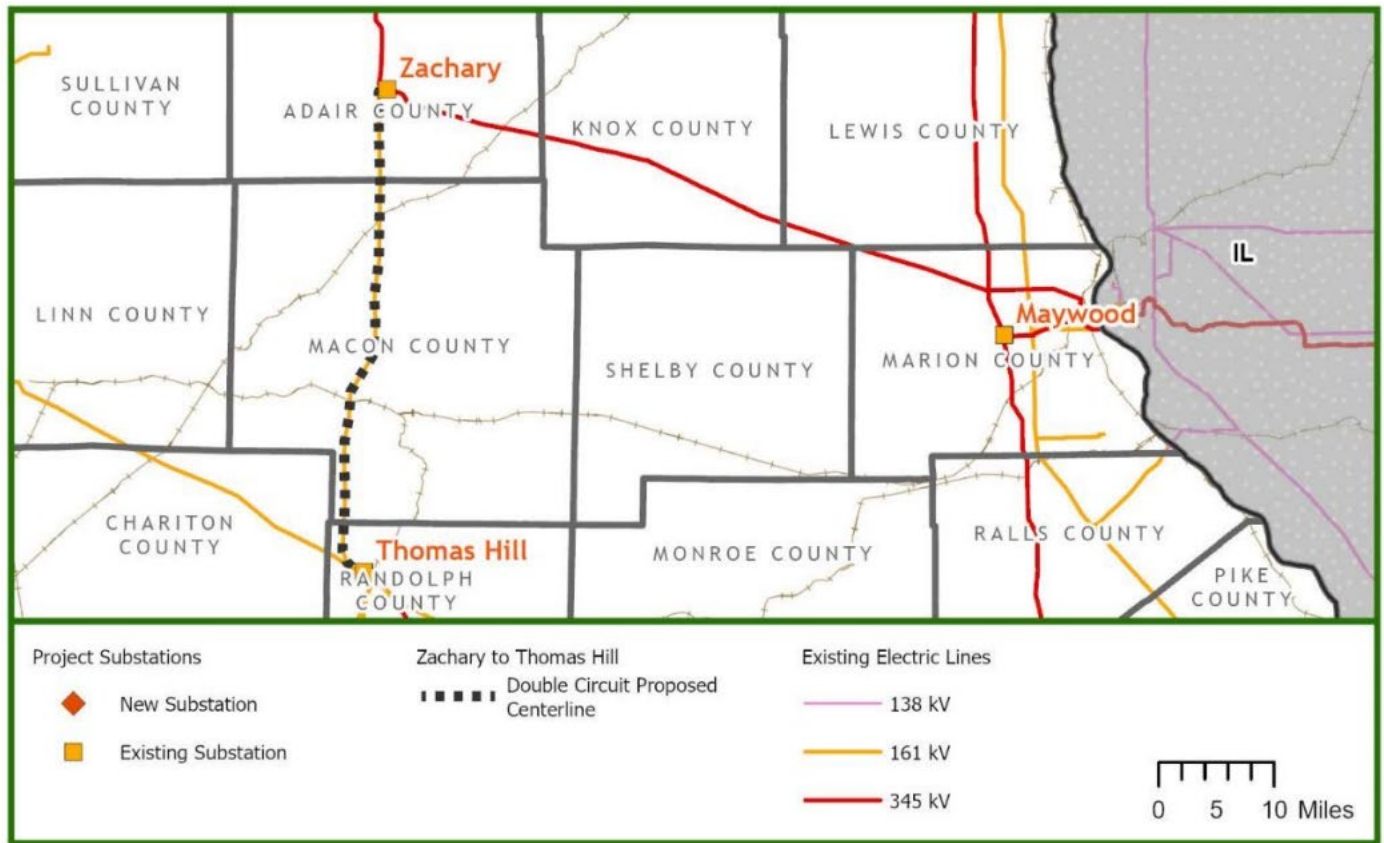
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8

The preliminary Zachary to Thomas Hill segment ("ZT") is proposed as rebuilding approximately 44 miles of an existing Ameren Missouri 161 kV single circuit transmission line. This will involve co-locating the new ATXI owned 345 kV transmission line onto new ATXI-owned double circuit structures along with the Ameren Missouri-owned 161 kV transmission line.

<sup>81</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 FINAL.pdf.

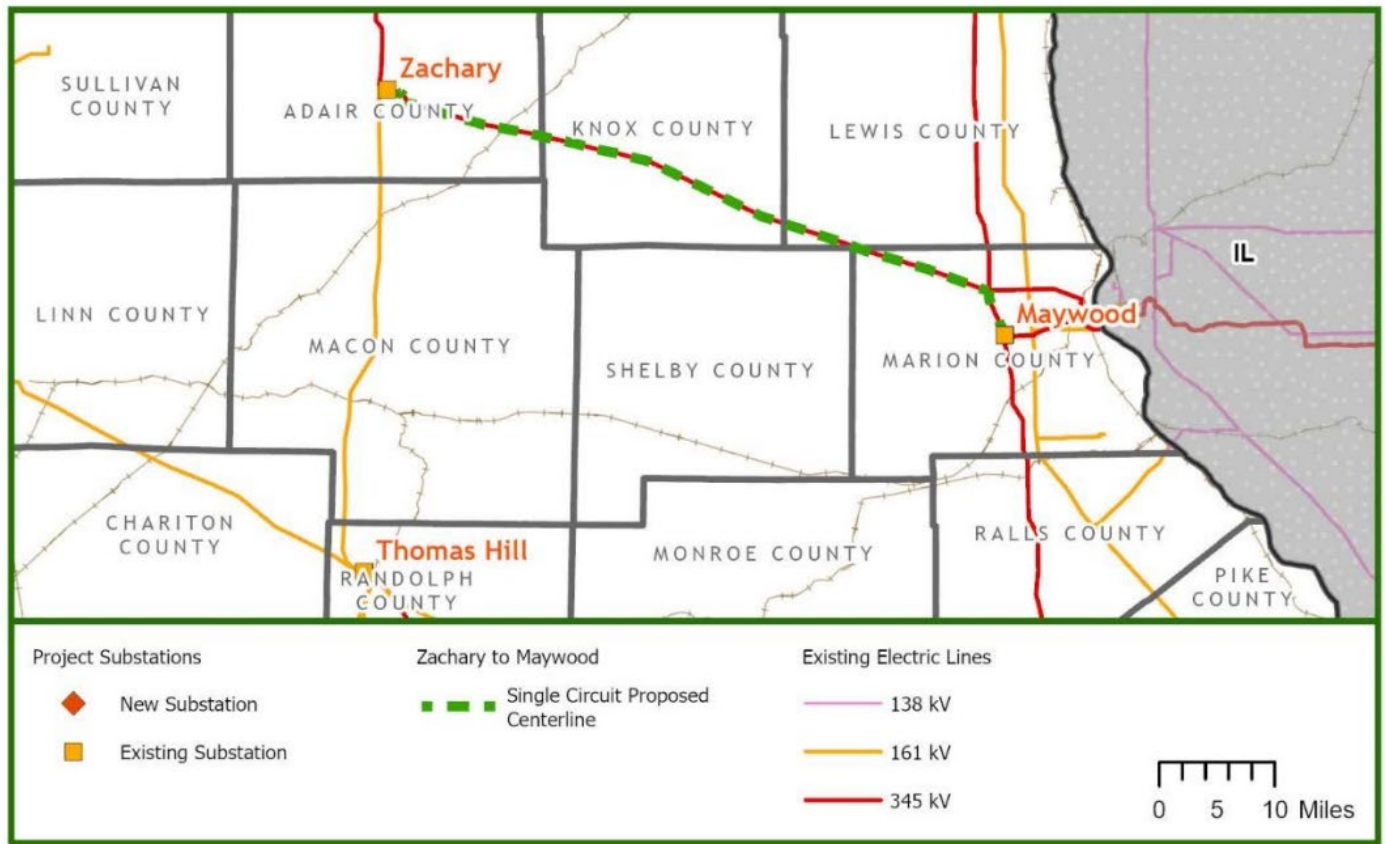




**Zachary Substation to Thomas Hill Substation Route Map<sup>82</sup>**

The preliminary Zachary to Maywood segment (“ZM”) is proposed as a new single circuit 345 kV transmission line that will be approximately 60 miles long, and will connect the existing Zachary substation to ATXI’s existing Maywood substation.

<sup>82</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 FINAL.pdf.



**Zachary Substation to Maywood Substation Route Map<sup>83</sup>**

After the preliminary routes evolved and took shape enough that visual aids could be developed, project education formats referred to as Community Resource Forums (“CRF’s”) were held in five different locations across the studied area. The CRF’s were held between local governmental representatives, and, ATXI, and HDR staff where the study area was displayed. The meeting venues were useful for ATXI to incorporate feedback, and to further refine the proposed routes. A couple months after the CRF’s were conducted, ATXI held two Open House meetings per day in each of the ten counties that landowners within the study area were invited to attend. These meetings gave landowners the opportunity to learn more about the project and to offer their input and feedback regarding the proposed routes. The information gathered at the meetings was then

<sup>83</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 Final.pdf

1 used by ATXI and HDR to finalize the routes. The consistent message which ATXI reports being  
2 conveyed by landowners at the Open House meetings was that the need to grant additional  
3 Right-of-Way should be minimized.

4 For the DZ segment of the project, ATXI and HDR staff determined that the need of new  
5 additional Right-of-Way could be reduced by 66 percent, if the DZ-DC option were used, which  
6 would co-locate and combine the existing AECI 161kV transmission line with the proposed  
7 ATXI 345 kV transmission line onto new structures as much as possible or feasible. According to  
8 ATXI, MISO favors the single circuit option, which, if approved, would necessitate ATXI  
9 requesting additional Right-of-Way for the DZ segment. The ZT segment will be a double  
10 circuit 345/161 kV transmission line, and will most likely not require any deviations from the  
11 proposed final route given that it is following an existing line path. The ZM segment will  
12 essentially follow an existing 345 kV transmission line and an existing 161 kV transmission line  
13 from the Zachary substation to the Maywood substation. There are two locations where the  
14 alignment would potentially be moved slightly from the initial route alignment, in order to provide  
15 more clearance from an existing house and to eliminate the crossing of a pond. Tables with route  
16 summaries provided in Mr. Schmidt's schedules to his direct testimony are included below:<sup>84</sup>

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<sup>84</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 FINAL.

DZ Segment Route Summary<sup>85</sup>

Criteria Type	Routing Criterion	Measure (unit)		DZ-SC Single Circuit Route	DZ-DC Double Circuit Route
	Length	Miles		102	107
	Angle Structures	Light (1-15 deg.)	(count)	56	64
		Medium (15-30 deg.)		25	23
		Light Heavy (30-60 deg.)		15	14
		Heavy (>60 deg.)		15	19
Right-of-way	Total ROW needed	Area	(acreage)	1851	1928
	ROW Overlap with existing Transmission Lines			12	1309
	New ROW Encumbered			1839	619
Residence and Non-Residential Structures	Residences (distance interval from route centerline)	0-75'	(count)	0	0
		75-150'		3	1
		150-300'		15	9
		300-500'		24	26
		500-1,000'		102	88
	Non-Residential Structures	0-75'	2	6	
	Landowners	Crossed by ROW	258	289	
	Parcels		329	386	
Miscellaneous Land Use Features	Religious Facilities and Cemeteries	Within 1000 feet	(count)	3	3
	Local Parks or Recreation Lands			3	3
	Mines & Quarries			3	6
Land Cover	Aquatic Environment	Area within ROW	(acreage)	40	31
	Cropland			1266	1396

Criteria Type	Routing Criterion	Measure (unit)		DZ-SC Single Circuit Route	DZ-DC Double Circuit Route
	Developed			33	27
	Forested			431	376
	Grassland			7.6	12
Agriculture	USDA Classified Farmland	Prime Farmland	Area within ROW <sup>1</sup> (acreage)	185	168
		Prime Farmland if Drained		580	591
		Farmland of State Importance		559	573
		Total of all Farmland Classes		1324	1333
Resource Lands	MDC or DNR Lands	Crossed by ROW <sup>1</sup>	(count)	0	0
		Area Crossed by ROW	(acreage)	0	0
		Within 1 Mile of Route	(count)	3	3
Hydrology	Non-Forested Wetlands	Within ROW	(acreage)	41	40
	Forested Wetlands	Within ROW	(acreage)	29	20
	Streams	Crossed	(count)	186	194
	Floodplain (Special Flood Hazard Areas)	Acres by ROW	Area	171	176

<sup>85</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, ATXI Schmidt\_Schedule DS-D1 FINAL.pdf.

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ZT Segment Route Summary<sup>86</sup>

Criteria Type	Routing Criterion	Measure (unit)		Proposed Route
	Length	Miles		44
	Angle Structures	Light (1-15 deg.)	(count)	42
		Medium (15-30 deg.)		4
		Light Heavy (30-60 deg.)		1
		Heavy (>60 deg.)		3
Right-of-way	Total ROW needed	Area	(acreage)	800
	ROW Overlap with existing Transmission Lines			533
	New ROW Encumbered			267
Residence and Non-Residential Structures	Residences (distance interval from route centerline)	0-75'	(count)	1
		75-150'		1
		150-300'		7
		300-500'		7
		500-1,000'		35
	Non-Residential Structures	0-75'	1	
	Landowners	Crossed by ROW	152	
Parcels	222			
Miscellaneous Land Use Features	Religious Facilities and Cemeteries	Within 1000 feet	(count)	2
	Local Parks or Recreation Lands			0
	Mines & Quarries			Within 1000 feet
Land Cover <sup>1</sup>	Aquatic Environment	Area within ROW	(acreage)	2.7
	Cropland			539
	Developed			9.4
	Forested			213
	Grassland			17
Agriculture	USDA Classified Farmland	Prime Farmland	Area within ROW <sup>1</sup> (acreage)	8.7
		Prime Farmland if Drained		131
		Farmland of State Importance		158
		Total of all Farmland Classes		297
Resource Lands	MDC or DNR Lands	Crossed by ROW	(count)	1
		Area Crossed by ROW	(acreage)	22.7
		Within 1 Mile of Route	(count)	5
Hydrology	Non-Forested Wetlands	Within ROW	(acreage)	18
	Forested Wetlands	Within ROW	(acreage)	0.5
	Streams	Crossed	(count)	77
	Floodplain (Special Flood Hazard Areas)	Acres by ROW	Area	35

<sup>1</sup> – Land cover data was obtained from the National Use Land Cover (NLCD). Aquatic environment classes include Emergent Herbaceous Wetlands, woody wetlands and surface water classes. Cropland classes include cultivated crops and hay field or other agricultural classes. Grassland classes include herbaceous lands. Forested classes include deciduous, coniferous, upland and partial canopy, and floodplain forest. Developed classes include high density, low / medium density, and urban open space. Barren class represents barren lands.

2

<sup>86</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, Pg. 30, Schmidt\_Schedule DS-D1 FINAL.pdf.



ZM Segment Route Summary<sup>87</sup>

Criteria Type	Routing Criterion	Measure (unit)		Proposed Route
	Length	Miles		60
	Angle Structures	Light (1-15 deg.)	(count)	28
		Medium (15-30 deg.)		8
		Light Heavy (30-60 deg.)		1
		Heavy (>60 deg.)		5
Right-of-way	Total ROW needed	Area	(acreage)	1090
	ROW Overlap with existing Transmission Lines			704
	New ROW Encumbered			386
Residence and Non-Residential Structures	Residences (distance interval from route centerline)	0-75'	(count)	0
		75-150'		0
		150-300'		7
		300-500'		27
		500-1,000'		41
	Non-Residential Structures	0-75'	3	
	Landowners	Crossed by ROW	169	
Parcels	266			
Miscellaneous Land Use Features	Religious Facilities and Cemeteries	Within 1000 feet	(count)	4
	Local Parks or Recreation Lands			0
	Mines & Quarries			0
Land Cover	Aquatic Environment	Area within ROW	(acreage)	58
	Cropland			798
	Developed			14
	Forested			184
	Grassland			9
Agriculture	USDA Classified Farmland	Prime Farmland	Area within ROW <sup>1</sup> (acreage)	139.3
		Prime Farmland if Drained		249.1
		Farmland of State Importance		232.9
		Total of all Farmland Classes		621.3
Resource Lands	MDC or DNR Lands	Crossed by ROW <sup>1</sup>	(count)	2
		Area Crossed by ROW <sup>1</sup>	(acreage)	7.9
		Within 1 Mile of Route	(count)	3
Hydrology	Non-Forested Wetlands	Within ROW <sup>1</sup>	(acreage)	32.3
	Forested Wetlands	Within ROW <sup>1</sup>	(acreage)	25.3
	Streams	Crossed	(count)	143
	Floodplain (Special Flood Hazard Areas)	Acres by ROW	Area	235.4

<sup>1</sup> – Land cover data was obtained from the National Use Land Cover (NLCD). Aquatic environment classes include Emergent Herbaceous Wetlands, woody wetlands and surface water classes. Cropland classes include cultivated crops and hay field or other agricultural classes. Grassland classes include herbaceous lands. Forested classes include deciduous, coniferous, upland and partial canopy, and floodplain forest. Developed classes include high density, low / medium density, and urban open space. Barren class represents barren lands.

<sup>87</sup> See File No. EA-2025-0087, Direct Testimony of Dan Schmidt, Pg. 36, Schmidt\_Schedule DS-D1 FINAL.pdf.

**Public Engagement Overview**

In April 2024, ATXI began holding a series of public information meetings for the Phase 2 – DZTM project after it was notified by MISO that its project bid had been selected. ATXI witness Leah Dettmers testified about the Community Engagement process and local Open House meetings, conducted by ATXI and its consultant, HDR, to provide landowners along the proposed route segments, as well as members of the public the opportunity to provide input. ATXI accomplished this process by the use of in-person and virtual meetings, and through various types of written correspondence that was mailed to property owners.<sup>88</sup> A summary of the various methods used to interact with landowners and the general public includes the following:

Outreach:

- 1) Two in-person open houses per affected county were held;
- 2) Use of a website dedicated to the project;
- 3) Use of a self-paced, self-guided virtual open house with interactive mapping tool, parcel maps, and a comment feature; and
- 4) Other ways to learn about & provide feedback on the project, such as mailers and route preference descriptors and surveys.

Community Representative Forums: Two meetings were held in the west region of the project, and three were held in the east region of the project from July 23 – 25, 2024.

In Person Public Engagement Open Houses: See page 11, Section B of the direct testimony of Witness Leah Dettmers. Twenty open house meetings were held during August 2024 in 10 different counties (two per day per county).<sup>89</sup>

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<sup>88</sup> See EA-2025-0087; ATXI Dettmers Direct FINAL testimony; ATXI Dettmers\_Schedule LD-D1FINAL; and, ATXI Dettmers\_Schedule LD-D2 FINAL.

<sup>89</sup> Staff members attended the August 22, 2024 public meeting in Randolph County.

1           Invitations to the August 2024 public meetings were mailed on postcards with a map of the  
2 project to approx. 1,300 landowners and 200 stakeholders.<sup>90</sup>

3           ATXI published a general notice of the project and the public meetings within the affected  
4 counties in multiple local newspapers prior to each of the meetings.

5           ATXI's Public Engagement Team mailed letters with project information to each County  
6 Clerk where the project would be occurring.

7           ATXI sent the same notification letter and project map to 200 local, state, and federal  
8 officials, including a designated Commission staff member, and designated staff members of the  
9 Missouri Farm Bureau and local cooperatives.

10           In total, approximately 300 people were listed on sign in sheets from the August 2024  
11 meetings. Per Leah Dettmers, some meeting attendees opted not to sign in, so there were more  
12 attendees than there are signatures on the sign in sheets.

13           From August 21, 2024 – November 1, 2024, the dedicated project website had over 1,400  
14 views of the web page from approximately 1,000 unique visitors.

15           From August 21, 2024 – November 1, 2024, over 1,100 users looked at the virtual open  
16 house presentation on the dedicated project website. The PDF for the virtual open house was also  
17 clicked on 1,165 times during the same time period.

### 18           **Consumer Comments**

19           As of May 30, 2025, the Commission received six consumer comment letters and emails  
20 entered into EFIS, related to this case.<sup>91</sup> One of those comments was a letter from State Senator  
21 Rusty Black, that was co-signed by Cindy O'Laughlin, President Pro Tem; Mazzie Christiansen,

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<sup>90</sup> See File No. EA-2025-0087, Direct Testimony of Leah Dettmers, Pg. 28, ATXI Dettmers\_Schedule LD-D1 FINAL.pdf

<sup>91</sup> See summary in Attachment B of this report.



State Representative; Danny Busick, State Representative; and, Dean Van Schoiack, State Representative, on behalf of their constituents, and fully in support of the double circuit option. The five other consumer comments received were generally opposed to the project, but one of those five referenced the Local Public Hearing that was held in Milan on April 22, 2025, and stated the majority of landowners in attendance at the LPH desired that if the project had to proceed, their preference would be the double circuit option.

### **Double Circuiting**

MISO approved the proposed DZ transmission line segment to be constructed as a single circuit line. At Community Representative Forums and at Open Houses and from on-line forums, the preference of a single circuit option versus a double circuit option was asked of the attendees. The table below shows the majority of respondents favor the double circuit option.<sup>92</sup> ATXI has requested that the Commission consider approving the double circuit option. If approved, ATXI would then seek concurrence from MISO for this option.

#### **Results of Survey of Landowners and Community Representatives**

##### **Regarding MISO Option A and Double Circuit Option B**

<b>Set of Responses</b>	<b>Number of Responses to Question</b>	<b>Percent Favoring MISO Option A</b>	<b>Percent Favoring Double Circuit Option B</b>
<b>CRF Surveys<sup>1</sup></b>	<b>19</b>	<b>0%</b>	<b>100%</b>
<b>Public Surveys<sup>2</sup></b>	<b>114</b>	<b>9.6%</b>	<b>90.4%</b>
<b>CRF &amp; Public Surveys<sup>3</sup></b>	<b>133</b>	<b>8.3%</b>	<b>91.7%</b>
<ol style="list-style-type: none"><li>1. Number of responses reflects 22 CRF comment forms completed at Community Representative Forums, less 3 CRF comment forms submitted without a response to this question.</li><li>2. Number of responses reflects 123 responses received via public comment forms submitted at open houses and thereafter and from online responses, less 9 public comment forms submitted without a response to this question.</li><li>3. Number of responses reflects 22 comment forms completed at Community Representative Forums (CRF), plus 123 responses received via public comment forms submitted at open houses and thereafter and from online responses, less 3 CRF and 9 public comment forms submitted without a response to this question.</li></ol>			

<sup>92</sup> See File No. EA-2025-0087, Direct Testimony of Leah Dettmers, Pg. 29, ATXI Dettmers\_Schedule LD-D1 FINAL.pdf

**Summary**

Staff recommended the Commission condition granting of the CCN for Phase 1 of the Northern Missouri Grid Transformation Project upon the Commission also granting a CCN for Phase 2 of the Project. As of, May 20, 2025, the Commission has not issued an order granting the CCN for Phase 1. ATXI has completed a routing study of the Phase 2 DZTM project, and it has have conducted and documented its Public Engagement process. The Commission has been asked to approve the double circuit option for the DZ segment of Phase 2 of the overall project.

A double circuit configuration would require the acquisition of significantly less Right-of-Way (619 acres for the DZ-DC option versus 1,839 acres for the DZ-SC option),<sup>93</sup> and appears to be the preferred option by those people who responded to ATXI's survey form. Additionally, a majority of attendees at the April 22, 2025, in-person LPH in Milan, Missouri, and some of the attendees of the virtual LPH on April 23, 2025, stated that if the project were approved, they would want to see the double circuit option approved. However, according to ATXI's application, the double circuit option is estimated to cost \$48.5 million more than the single circuit option.<sup>94</sup>

In an effort to obtain information to aid the Commissioners in deciding whether to recommend the single circuit or the double circuit option, Staff asked three Data Request's, two to ATXI and one to MISO, pertaining to how costs would be allocated to customers within the MISO service area, and requesting the cost differential per kilowatt-hour ("kWh") for the single circuit versus double circuit options. In Data Request 0022 (attached in Schedule A), ATXI estimates that for the first year revenue requirement, the difference in rate for the double circuit option is

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<sup>93</sup> See File No. EA-2025-0087, Application, paragraph 23.

<sup>94</sup> See File No. EA-2025-0087, Application, paragraph 39.

approximately \$0.0106/MWh (\$0.0000106/KWh), using the MISO estimated load for the year 2030. This would be in addition to the single circuit option's first year revenue rate of \$0.1040/MWh using the same MISO-estimated load for the year 2030. Data Request's 0015 and 0016 (also attached in Schedule A) explain the cost allocation from the perspectives of ATXI and MISO. The double circuit option is highly preferred by landowners over the single circuit option. Staff recommends the Commission approve the double circuit option, noting that MISO would have to concur with a Commission recommendation in order to move forward with it.

*Staff Witness: Donald Fontana, PE*

### **Recommended Conditions**

In summary, based on Staff's review: 1) the Project is needed; 2) ATXI is qualified to construct, install, own, operate, maintain, and otherwise control and manage the Project; 3) ATXI has the financial ability to undertake the Project; and 4) the Project is economically feasible. Further, based on Staff's experience with transmission CCN cases similar to the present case, and to ensure the Project is in the public interest, Staff recommends the following conditions be imposed by Commission order:

### **Right-of-way Acquisition and Micro-siting:**

- 1) Throughout the right-of-way acquisition process, ATXI will use all reasonable efforts to follow the route(s) depicted in Appendix E, Appendix F, and, Appendix G of the Application. But ATXI will be allowed to deviate from the depicted route in two scenarios:
  - a. First, if surveys or testing do not necessitate a deviation, ATXI may deviate from the depicted route on a particular parcel if ATXI and each landowner on which the deviation will run agree. Either ATXI or landowner may initiate such a request to deviate.
  - b. Second, if ATXI determines that surveys or testing require a deviation, ATXI will negotiate in good faith with the affected landowner and if agreement can be reached, ATXI may deviate from the depicted route on that parcel, as agreed with the affected landowner(s).

With respect to any parcel other than the identified parcels where ATXI desires to locate the line, whether because testing or surveys necessitate acquisition of an easement on that parcel or for other reasons (e.g., a request from adjacent landowners), ATXI will negotiate in good faith with the landowner of each affected parcel over which ATXI has determined an easement is needed or desired and, if agreement is reached, may deviate from the depicted route by locating the line on the affected parcel(s) but will notify the Commission of the deviation and parcels affected prior to construction on that parcel.

If testing or surveys necessitate acquisition of an easement on such other parcel(s) and agreement is not reached, despite good faith negotiations, ATXI will file a request with the Commission to allow it to deviate from the depicted route onto the affected parcel(s) and shall, concurrently with the filing of its request with the Commission, send a copy of its request to the owner(s) of record of the affected parcel(s) via U.S. Mail, postage prepaid, as shown by the County Assessor's records in the county where the affected parcel is located, or at such other address that has been provided to ATXI by the owner(s). ATXI shall fully explain in that request why ATXI determined the change in route is needed and file supporting testimony with its request and the name(s) and addresses of the owner(s) to whom it provided a copy of its request. After Commission notice of the opportunity for a hearing on the issue of whether the change in route should be approved is given to the owner, Staff and OPC, and after an opportunity to respond, the Commission will grant or deny the request.

2) Absent a voluntary agreement for the purchase of the property rights, the transmission line shall not be located so that a residential structure currently occupied by the property owners will be removed or located in the easement, including for electrical code compliance purposes.

3) Prior to the commencement of construction on a parcel, ATXI will secure an easement, which will include a surveyed legal description showing the precise dimension, including the length and width, for the permanent transmission line easement area for each affected parcel. In addition, ATXI will track each easement grant by way of a spreadsheet that identifies each parcel by Grantor and County, and which contains the recording information for each parcel. Upon securing all necessary easements for the Project, ATXI will file a copy of the spreadsheet with the Commission, to which a map will be attached. For each parcel, the map and the spreadsheet will include a unique indicator that allows the Commission to see where on the map that parcel is located.

4) ATXI shall follow the construction, clearing, maintenance, repair, and right-of-way practices consistent with what was proposed by the Company for the Phase 2 projects.<sup>95</sup>

#### **Reporting requirements:**

5) ATXI shall file with the Commission in this case a legal description of the line segments when acquisition of the necessary land rights is finalized.

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<sup>95</sup> Provided in Case No. EA-2024-0302 ATXI Schedule TG-D4 FINAL (for the Phase 1 Project).

6) ATXI shall file the final Joint Ownership Agreement and Joint Use Agreement with the Commission in this case within 30 days of executing the agreements.

7) ATXI shall file the specific impact, if any, of the proposed transfer of the assets to be constructed on the tax revenues of the political subdivisions in which the proposed structures, facilities, or equipment are located.<sup>96</sup> The Joint Ownership Agreement, Schedule A, may satisfy this reporting condition if it additionally identifies the political subdivisions in which the proposed structures, facilities, or equipment are located.

8) ATXI shall file with the Commission in this case all required government approvals and permits—e.g., any applicable land disturbance permits, Missouri State Highway Commission permits, or US Army Corps of Engineers permits— before beginning construction on the part of the Project (DZTM) where the approvals and permits are required, and shall file such approvals and permits with the Commission before beginning construction or, for approvals and permits obtained less than 90 days before beginning construction, within 90 days of receipt.

9) ATXI shall file with the Commission any agreement between ATXI and the pipeline companies that have assets being crossed by the Projects (DZTM).

10) ATXI shall file with the Commission the annual report it files with FERC.

11) ATXI shall file any vegetation management filing made to FERC, NERC, or a regional reliability organization in EFIS as a non-case related filing.

12) ATXI shall obtain acknowledgement from Ameren Missouri that they remain bound by the following provision from the 3rd Order Modifying the 2012 Report and Order in Case No. EO-2011-0128:

For transmission facilities located in Ameren Missouri's certificated service territory that are constructed by an Ameren affiliate and that are subject to regional cost allocation by MISO, for ratemaking purposes in Missouri, the costs allocated to Ameren Missouri by MISO shall be adjusted by an amount equal to the difference between:

(I) The annual revenue requirement for such facilities that would have resulted if Ameren Missouri's Commission-authorized ROE and capital structure had been applied and there had been no construction work in progress ("CWIP") (if applicable), or other FERC Transmission Rate Incentives, including Abandoned Plant Recovery, recovery on a current basis instead of capitalizing pre-commercial operations expenses and accelerated depreciation, applied to such facilities and

(II) The annual FERC-authorized revenue requirement for such facilities. The ratemaking treatment established in this provision will, unless otherwise agreed or ordered, continue as long as Ameren Missouri's transmission system remains under MISO's functional control.

**Other:**

13) Staff recommends the Commission's granting of a CCN for Phase 2 Projects be conditioned on a CCN being granted for Phase 1.

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<sup>96</sup> 20 CSR 4240-10.105(F).

- 14) ATXI shall, for all future transmission line projects in Missouri which require a CCN and also require a public meeting pursuant to 20 CSR 4240-20.045(6)(K)3, develop and maintain, using best efforts, interactive route maps on its website(s) showing preferred and alternative routes that are known at that time and still under active consideration by the ATXI, as well as any related study areas. These maps shall include satellite imagery in sufficient detail for affected landowners to locate their property. These maps shall be maintained from at least the date of any public meeting(s) held, when required, and shall display preferred and known alternative routes proposed in its application or discussed in its written testimony from the date an application is filed through the effective date of the Commission's Report and Order ruling on the subject CCN application (CCN Order) or the date ATXI discontinues development of the project, whichever occurs first. If public meetings are not required to be held, ATXI shall post maps beginning on the date it provides notice of the application to affected landowners. This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.
- 15) ATXI shall, for all projects referenced in Condition 12, include instructions for accessing the website and maps referenced in Condition 12 on all required notifications sent to affected landowners. This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.
- 16) ATXI shall, for all projects referenced in Conditions 12 and 13, refresh its data used to comply with 20 CSR 4240-20.045(6)(K)1 that identifies the owners of land directly affected by the requested certificate, including the preferred route and any known alternative route, and entitled to receive notice of its application. The refresh of the data shall be conducted within 90 days after filing an application for a CCN to confirm the identified parcels and owners of land directly affected by the requested certificate as of the date notice of the application was issued pursuant to 20 CSR 4240-20.045(6)(K)1 and (6)(K)2. If such refresh identifies a person entitled to receive notice of the application to whom ATXI did not send such notice, ATXI shall provide a notice to such person(s) in accordance with 20 CSR 4240-20.045(6)(K)4. This condition shall be applied to all ATXI applications for a CCN filed after the Commission grants a CCN in this proceeding, should be considered independently, and any deficiencies related to this condition should not, on its own, affect the validity of a CCN granted in this proceeding.
- 17) If the Commission grants a CCN in this proceeding, ATXI shall notify all previously notified landowners (whether or not the landowner is directly affected by the final route selected by the Commission) within 30 days of the effective date of the Commission's Order granting a CCN in this proceeding. Any such notice shall include the requirements set forth in 20 CSR 4240-20.035(6)(K)2 and indicate whether the Commission approved the single circuit or double circuit option.

*Staff Witness: Claire M. Eubanks, PE and Donald Fontana PE*

- 1      **Attachment A - Summary of Application Filing Requirements**
- 2      **Attachment B - Public Comments received through May 30, 2025**
- 3      **Appendix 1 - Staff Credentials**

**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 to )  
Transmission Investments in North Central )  
Missouri )

Case No. EA-2025-0087

**AFFIDAVIT OF MALACHI BOWMAN**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

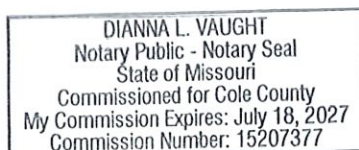
**COMES NOW MALACHI BOWMAN** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Report form; and that the same is true and correct according to his best knowledge and belief.

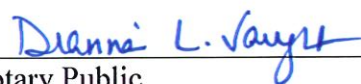
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**MALACHI BOWMAN**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29<sup>th</sup> day of May 2025.



  
\_\_\_\_\_  
Notary Public



**BEFORE THE PUBLIC SERVICE COMMISSION**  
**OF THE STATE OF MISSOURI**

In the Matter of the Application of Ameren	)	
Transmission Company of Illinois for a	)	Case No. EA-2025-0087
Certificate of Convenience and Necessity	)	
under Section 393.170.1, RSMo, Relating to	)	
Transmission Investments in North Central	)	
Missouri	)	

**AFFIDAVIT OF CLAIRE M. EUBANKS, PE**

STATE OF MISSOURI	)	
	)	ss.
COUNTY OF COLE	)	

COMES NOW CLAIRE M. EUBANKS, PE, and on her oath declares that she is of sound mind and lawful age; that she contributed to the foregoing *Staff Recommendation* in Report form; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

  
CLAIRE M. EUBANKS, PE

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 2<sup>nd</sup> day of June 2025.



  
Notary Public

**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 to )  
Transmission Investments in North Central )  
Missouri )

Case No. EA-2025-0087

**AFFIDAVIT OF DONALD A. FONTANA, PE**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

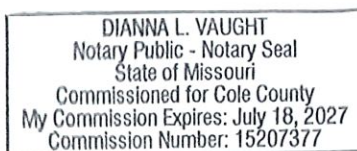
**COMES NOW DONALD A. FONTANA, PE**, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Report form; and that the same is true and correct according to his best knowledge and belief.

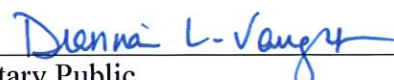
Further the Affiant sayeth not.

  
**DONALD A. FONTANA, PE**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 30<sup>th</sup> day of May 2025.



  
Notary Public

**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 to )  
Transmission Investments in North Central )  
Missouri )

Case No. EA-2025-0087

**AFFIDAVIT OF J LUEBBERT**

STATE OF MISSOURI )  
 ) ss.  
COUNTY OF COLE )

**COMES NOW J LUEBBERT** and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Report form; and that the same is true and correct according to his best knowledge and belief.

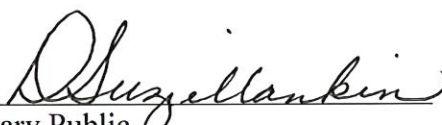
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**J LUEBBERT**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 2<sup>nd</sup> day of June 2025.



  
\_\_\_\_\_  
Notary Public

**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 to )  
Transmission Investments in North Central )  
Missouri )

Case No. EA-2025-0087

**AFFIDAVIT OF SEOUNG JOUN WON, PhD**

STATE OF MISSOURI     )  
                                      )  
COUNTY OF COLE     )     ss.

**COMES NOW SEOUNG JOUN WON, PhD**, and on his oath declares that he is of sound mind and lawful age; that he contributed to the foregoing *Staff Recommendation* in Report form; and that the same is true and correct according to his best knowledge and belief.

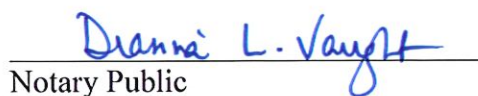
Further the Affiant sayeth not.

  
\_\_\_\_\_  
**SEOUNG JOUN WON, PhD**

**JURAT**

Subscribed and sworn before me, a duly constituted and authorized Notary Public, in and for the County of Cole, State of Missouri, at my office in Jefferson City, on this 29<sup>th</sup> day of May 2025.

DIANNA L. VAUGHT Notary Public - Notary Seal State of Missouri Commissioned for Cole County My Commission Expires: July 18, 2027 Commission Number: 15207377
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\_\_\_\_\_  
Notary Public

## **Attachment A – Summary of application requirements**

ATXI filed their Application pursuant to Section 393.170.1, RSMo, 20 CSR 4240-2.060, and 20 CSR 4240-20.045 to the Missouri Public Service Commission (“Commission”) for a certificate of convenience and necessity (“CCN”) authorizing it to construct, install, own, operate, control, manage, and maintain the proposed projects and, pursuant to Section 393.190.1, RSMo, 20 CSR 4240-2.060, and 20 CSR 4240-10.105, makes this application to the Commission for permission and authority to transfer an undivided 49% interest in certain transmission facilities for the DZTM Project to the Missouri Joint Municipal Electric Utility Commission (“MJMEUC”). More specifically, ATXI requests 49% of the following facilities be transferred: (1) Denny – Zachary 345 kV circuit and structures; (2) Zachary to Maywood segment 345 kV circuit and structures; and (3) Zachary – Thomas Hill 345 kV circuit only.

### **20 CSR 4240-2.060**

20 CSR 4240-2.060(1)(A) requires the legal name of each applicant, a brief description of the legal organization of each applicant, whether a Missouri corporation, foreign corporation, partnership, proprietorship, or other business organization, the street and mailing address of the principal office or place of business of each applicant and each applicant’s electronic mail address, fax number and telephone number, if any.

- Application, paragraph 1. ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(B) requires if any applicant is a Missouri corporation, a Certificate of Good Standing from the secretary of state.

- ATXI is a corporation organized under the laws of Illinois with its principal office at 1901 Chouteau Avenue, St. Louis, Missouri 63103. It is a wholly owned subsidiary of Ameren Corporation (Ameren). ATXI is duly authorized to do business in Missouri. A certified copy of ATXI’s Authority to Conduct Business in the State of Missouri was attached to the Application as Appendix A.
- ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(C) requires if any applicant is a foreign corporation, a certificate from the secretary of state that it is authorized to do business in Missouri.

- This requirement does not apply.

20 CSR 4240-2.060(1)(D) requires if any applicant is a partnership, a copy of the partnership agreement.

- This requirement does not apply.

20 CSR 4240-2.060(1)(E) requires if any applicant does business under a fictitious name, a copy of the registration of the fictitious name with the secretary of state.

- ATXI does not do business under a fictitious name in Missouri.



20 CSR 4240-2.060(1)(F) requires if any applicant is a political subdivision, a specific reference to the statutory provision and a specific reference to any other authority, if any, under which it operates.

- This requirement does not apply.

20 CSR 4240-2.060(1)(G) requires if any applicant has submitted the applicable information as set forth in subsections (1)(B)–(F) of this rule in a previous application, the same may be incorporated by reference to the case number in which the information was furnished, so long as such applicable information is current and correct.

- This requirement does not apply.

20 CSR 4240-2.060(1)(H) requires a brief statement of the character of business performed by each applicant.

- ATXI provides a brief statement in Application Paragraph 3 noting that “ATXI is engaged in the construction, ownership, and operation of interstate transmission lines that transmit electricity for public use. ATXI was first recognized by the Commission as a public utility in File No. EA-2015-0145.”
- ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(I) requires name, title, address, and telephone number of the person to whom correspondence, communications, and orders and decision of the commission are to be sent, if other than to the applicant’s legal counsel. Name, title, address and telephone number of legal counsel and paralegal was provided.

- The required information is on page 27 of the Application.
- ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(J) requires if any applicant is an association, other than an incorporated association or other entity created by statute, a list of all of its members.

- This requirement does not apply to ATXI.

20 CSR 4240-2.060(1)(K) requires a statement indicating whether the applicant has any pending action or final unsatisfied judgments or decisions against it from any state or federal agency or court which involve customer service or rates, which action, judgment, or decision has occurred within three (3) years of the date of the application.

- ATXI represents that other than matters that may be pending before the Federal Energy Regulatory Commission (“FERC”), ATXI has no pending actions or final unsatisfied judgments or decisions against it from any state or federal court or agency within the past three (3) years involving customer service or rates.
- ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(L) require a statement that no annual report or assessment fees are overdue.

- ATXI has no overdue or unpaid annual reports or assessment fees.
- ATXI has satisfied this requirement.

20 CSR 4240-2.060(1)(M) requires all applications shall be subscribed and verified by affidavit under oath by one (1) of the following methods: if an individual, by that individual; if a partnership, by an authorized member of the partnership; if a corporation, by an authorized officer of the corporation; if a municipality or political subdivision, by an authorized officer of the municipality or political subdivision; or by the attorney for the applicant if the application includes or is accompanied by a verified statement that the attorney is so authorized.

- An affidavit providing the authorized officer verification required by 20 CSR 4240-2.060(1)(M) is attached as Appendix B to the Application.
- ATXI has satisfied this requirement.

## **20 CSR 4240-20.045**

20 CSR 4240-20.045(3)(A) requires the application shall include facts showing that granting the application is necessary or convenient for the public service.

- ATXI has satisfied this requirement.

20 CSR 4240-20.045(3)(B) requires if an asset to be operated or constructed is outside Missouri, the application shall include plans for allocating costs, other than regional transmission organization/independent system operator cost sharing, to the applicable jurisdiction.

- Phase 2 is entirely within Missouri.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(3)(C) requires if any of the items required under this rule are unavailable at the time the application is filed, the unavailable items may be filed prior to the granting of authority by the commission, or the commission may grant the certificate subject to the condition that the unavailable items be filed before authority under the certificate is exercised.

- ATXI has not yet determined what assets, permits or other authorizations may be required from any affected governmental bodies in order to commence construction of the New Facilities. If any are required, ATXI will provide them when they are available, consistent with Missouri law, as permitted under 20 CSR 4240-20.045(3)(C).
- Staff has also recommended a condition related to reporting of permits.

20 CSR 4240-20.045(6)(A) requires a description of the proposed route or site of construction.

- The proposed route for the DZTM Project is shown in Appendix E, F, and F of the Application:
  - Appendix E: Denny - Zachary Double Circuit Option and the Denny to Zachary Single Circuit Option;
  - Appendix F: Denny to Zachary Segment; and
  - Appendix G: Zachary to Thomas Hill Segment.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(B) requires a list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and nonregulated utilities, railroad tracks, and each underground facility, as defined in section 319.015, RSMo, which the proposed construction will cross.

- List of Utilities and Railroads is contained in Appendix C to the Application. ATXI developed the list from GIS and public data. Many owner/operators are not identifiable. ATXI represents it will continue to verify utilities as Project Development continue.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(C) requires a description of the plans, specifications, and estimated costs for the complete scope of the construction project that also clearly identifies what will be the operational features of the asset once it is fully operational and used for service.

- This information was collectively provided in the direct testimonies of ATXI witness Rudis and ATXI witness Molitor, and Schedules NR-D1 (Confidential), AM-D1, and GE-D2 (Confidential). The estimated costs for the complete scope of the Phase 1 Projects and the Program, as well as the portions of the total Phase 1 Projects and Program costs to be allocated to ATXI and to the MISO AMMO Pricing Zone, were provided in the direct testimony of ATXI witness Rudis and ATXI witness Gudeman. ATXI estimates that the total cost to construct the Program, including the Phase 1 and Phase 2 Projects, is \$611.1 million. ATXI estimates that its total cost to construct just the Phase 2 Projects is \$490.6 million<sup>1</sup>. These estimates include, respectively, all Program or Phase 2 Project construction, both transmission line and substation work, as well as needed real estate rights.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(D) requires the projected beginning of construction date and the anticipated fully operational and used for service date of the asset.

- The Phase 2 Projects schedule, including the projected beginning of construction date and the anticipated fully operational and used for service date of the New Facilities, was provided in the direct testimony of ATXI witness Rudis and Schedule NR-D2 to that testimony. ATXI intends to commence construction of Phase 2 by March 2027 and anticipates that those projects will be in service by October 2029.<sup>2</sup>
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(E) requires a description of any common plant to be included in the construction project.

- ATXI represents that there is no common plant included in the Phase 2 Project.<sup>3</sup>
- ATXI has satisfied this requirement.

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<sup>1</sup> EA-2025-0087 Application Paragraph 39.

<sup>2</sup> EA-2025-0087 Application Paragraph 40.

<sup>3</sup> EA-2025-0087 Application Paragraph 41.



20 CSR 4240-20.045(6)(F) requires plans for financing the construction of the asset.

- ATXI's plans for financing the New Facilities were provided and explained in the direct testimony of ATXI witness Gudeman.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(G) requires a description of how the proposed asset relates to the electric utility's adopted preferred plan under 4 CSR 240-22.

- ATXI is not subject to, and does not have a Preferred Resource Plan under, 20 CSR 20 4240-22, as it is a transmission-only utility and is not an electric utility that sold more than one (1) million megawatt-hours to Missouri retail electric customers in calendar year 2009. Accordingly, the 20 CSR 4240-20.045(6)(G) requirement to describe how the Projects relate to the utility's adopted preferred plan is not applicable to ATXI.

20 CSR 4240-20.045(6)(H) requires an overview of the electric utility's plan for this project regarding competitive bidding, although competitive bidding is not required, for the design, engineering, procurement, construction management, and construction of the asset.

- The overview of ATXI's plan regarding competitive bidding for the design, engineering, procurement, construction management, and construction of the New Facilities was provided in the direct testimony of ATXI witness Rudis.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(I) requires an overview of plans for operating and maintaining an asset.

- ATXI's overview of plans for operating and maintaining the New Facilities was provided in the direct testimony of ATXI witness Rudis.
- ATXI has satisfied this requirement.

20 CSR 4240-20.045(6)(J) requires an overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of an asset.

- ATXI's overview of plans for restoration of safe and adequate service after significant, unplanned/forced outages of the New Facilities is provided in the direct testimony of ATXI witness Rudis.
- Additionally, ATXI provided relevant practices, procedures, and/or standards documenting its transmission facilities practices in response to Data Request No. 0012.
- ATXI has satisfied this requirement.

20 CSR 4240- 20.045(6)(K) requires an affidavit or other verified certification of compliance with the following notice requirements to landowners directly affected by electric transmission line routes or transmission substation locations proposed by the application. The proof of compliance shall include a list of all directly affected landowners to whom notice was sent.

- ATXI provided an affidavit certifying compliance in Appendix D to the Application and listing of all directly affected landowners. Additionally, on April 21, 2025, ATXI filed an additional affidavit regarding notice in accordance with 20 CSR 4240-20.045(6)(K)4. Staff further notes that to date the Commission has not received Comments related to notification issues for Phase 2.
- ATXI has satisfied this requirement.

## **20 CSR 4240-10.105**

20 CSR 4240-10.105(1)(A) A brief description of the property involved in the transaction, including any franchises, permits, operating rights, or certificates of convenience and necessity.

- ATXI will transfer an undivided 49% interest in the assets comprising the competitive portion of the DZTM Project facilities that will be owned by ATXI, together with a partial assignment of an undivided 49% interest in the easements.<sup>4</sup> ATXI provided the Joint Ownership Agreement in Confidential Schedule NR-D4. Schedule A will be populated at the time of Closing to list the specific assets. ATXI represents that it commits to provide the final copy as a compliance condition<sup>5</sup>.
- ATXI has satisfied this requirement.
- Staff has included ATXI's commitment in its recommended list of conditions.

20 CSR 4240-10.105(1)(B) A copy of the contract or agreement of sale.

- ATXI provided the Joint Ownership Agreement in Confidential Schedule NR-D4.
- ATXI has satisfied this requirement.

20 CSR 4240-10.105(1)(C) The verification of proper authority by the person signing the application or a certified copy of resolution of the board of directors of each applicant authorizing the proposed action.

- ATXI provided Appendix B which is an affidavit of Shawn Schukar.
- ATXI has satisfied this requirement.

20 CSR 4240-10.105(1)(D) The reasons the proposed sale of the assets is not detrimental to the public interest.

- ATXI provided reasons the proposed sale of the assets is not detrimental in the Application paragraphs 49 to 51. ATXI argues the existence of the benefit of lowering the DZTM Project cost via the transfer of interest in certain assets to MJMEUC demonstrates the transfer is not detrimental to the public interest. Further, ATXI represents that the transfer of this interest will not prevent or hinder the continuation of safe and adequate service by ATXI to Missouri customers.
- ATXI has satisfied this requirement.

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<sup>4</sup> EA-2025-0087 Application, paragraph 52.

<sup>5</sup> EA-2025-0087 Application, page 24, footnote 9.

20 CSR 4240-10.105(1)(E) If the purchaser is subject to the jurisdiction of the commission, a balance sheet and income statement with adjustments showing the results of the acquisitions of the property.

- MJMEUC is not subject to the rate making jurisdiction of the Commission.
- ATXI has satisfied this requirement.

20 CSR 4240-10.105 (F) A statement of the impact, if any, the sale, assignment, lease, or transfer of assets will have on the tax revenues of the political subdivisions in which any structures, facilities, or equipment of the companies involved in that sale are located.

- ATXI states: “The specific impact, if any, of the proposed transfer of the assets to be constructed on the tax revenues of the political subdivisions in which the proposed structures, facilities, or equipment are located are not available at this time and will be provided later in this proceeding pursuant to 20 CSR 4240-10.105(3).”<sup>6</sup>
- ATXI further represents: “The exact value of the assets proposed to be transferred to MJMEUC within each political subdivision exempt from property taxes is not currently available but will be the year after the project goes into service in 2030.”<sup>7</sup>
- To ensure that Staff and the Commission receive the impact of the transfer of assets on tax revenues of each political subdivision, Staff recommends the Commission order ATXI to provide, after the Project is in-service, ATXI shall file the specific impact, if any, of the proposed transfer of the assets to be constructed on the tax revenues of the political subdivisions in which the proposed structures, facilities, or equipment are located. The Joint Ownership Agreement, Schedule A, may satisfy this reporting condition if it additionally identifies the political subdivisions in which the proposed structures, facilities, or equipment are located.
- ATXI has satisfied this requirement.

Sections (2) and (3) of the subject rule are not applicable.<sup>8</sup>

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<sup>6</sup> EA-2025-0087 Application Paragraph 52.

<sup>7</sup> Response to Staff Data Request No. 0017.

<sup>8</sup> EA-2025-0087 Application Paragraph 53.



RECEIVED  
April 23, 2025  
Data Center  
Missouri Public  
Service Commission

## MISSOURI SENATE

### SENATOR RUSTY BLACK

DISTRICT 12

MISSOURI STATE CAPITOL BUILDING  
201 W. CAPITOL AVE., ROOM 420  
JEFFERSON CITY, MO 65101

April 22<sup>nd</sup>, 2025  
Missouri Public Service Commission  
200 Madison Street  
Jefferson City, MO 65102

Dear Commissioners,

As the Missouri Public Service Commission reviews Ameren Transmission Company of Illinois' application for the DZTM Project, I respectfully urge your support for the proposed co-location strategies outlined in the filing. These thoughtful infrastructure solutions reflect a forward-looking approach to transmission development that prioritizes efficiency, environmental stewardship, and most importantly, responsible land use.

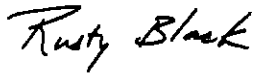
The proposed co-location along the ZT segment, where a new 345 kV line would share existing structures with an Ameren Missouri 161 kV line, exemplifies a smart use of existing corridors. By upgrading within the current right-of-way, Ameren can significantly reduce the need for additional land acquisition, avoid unnecessary disruption to private property owners, and streamline construction timelines – all while preserving system reliability and safety.

Similarly, the proposed co-location along the DZ segment, in partnership with Associated Electric Cooperative, Inc. (AECI), offers a practical model of utility collaboration. Combining efforts to rebuild and co-locate lines where feasible not only minimizes environmental impact but also maximizes the benefit of ratepayer investments. Many constituents and landowners have voiced support for co-location as a way to reduce the cumulative footprint of utility infrastructure on private lands and avoid unnecessary disruptions. Their concerns highlight the need for thoughtful planning that respects both community interests and environmental stewardship.

In light of these benefits, I respectfully encourage the Commission to support Ameren's request to implement co-location in the DZTM Project. These measures reflect the kind of innovative, cooperating planning that Missouri should continue to promote as we modernize and expand our energy infrastructure.

Thank you for your time and consideration in this matter.

Sincerely,



Rusty Black  
State Senator



Cindy O'Laughlin  
President Pro Tem



Mazzie Christensen  
State Representative



Danny Busick  
State Representative



Dean Van Schoiack  
State Representative

Comment

P202502205

Date Filed

4/14/2025 2:29 PM

Submitted By

Tiffany Hildebrand

Name

Roger Brown

Address

undisclosed  
Undisclosed, MO 00000

Phone

(Cell)  
(660) 349-0299

Email Address

Related Submission No.

EA-2025-0087

Company

Ameren Transmission Company of Illinois (Electric) (Investor)

Comments

"I am against this. They took land 5 years ago and said that was it. Now they want more including a of house that may fall within the easement. We have a tenant that is living in that house and has been there for 45 years. This has been our land since 1952. I didn't like it the first time they took and easement and this is not right!"

Attachments ▼

No Attachments Found

Comment  
P202502638

**Date Filed**  
4/22/2025 9:53 AM

**Submitted By**  
Mariya Stewart

**Name**  
Rachelle Chadwick

**Address**  
23247 State Hwy DD  
Gallatin, MO 64640

**Phone**

**Email Address**  
chadwick.missy@gmail.com

**Related Submission No.**  
EA-2025-0087

**Company**  
Ameren Transmission Company of Illinois (Electric) (Investor)

**Comments**  
"I am sending this email in regards to ATXI's proposed route for the DZTM Project. I am not in favor of having ATXI place lines on my property. We have a farm of 23 acres in which our house, machine shed, and fireworks stand is located. The remaining 15 acres we farm. Placing power poles would either be put right in my yard or in the field that we depend on for our income. We have a small farm, so in turn, we use every ounce of it. This is my reasoning for not placing power poles on my property."

Attachments ▼

No Attachments Found

Comment  
P202502197

**Date Filed**  
4/14/2025 12:09 PM

**Submitted By**  
Justin Edwards

**Name**  
Lloyd Cleaver

**Address**  
22419 Oak Lake Trail  
Kirksville, MO 63501

**Phone**

**Email Address**

**Related Submission No.**  
EA-2025-0087

**Company**  
Ameren Transmission Company of Illinois (Electric) (Investor)

**Comments**  
Lloyd has had property in family for over 40 years. He is a pilot, and a private landing strip is in his plans for his property along with a son building his house. The lines cannot go through his property and is opposed to any lines being placed on his property.

Attachments ▼

No Attachments Found



Public Service Commissioners,

I attended a recent public meeting in Milan regarding the ATXI project. I heard a lot of landowners speak their minds and ask questions of Ameren. The general consensus seems to be opposition to this project for many reasons. I did hear an overwhelming majority of landowners voice a desire to see the double circuit, single pole option if this project proceeds.

Ameren is a huge public utility and as such, seems to get whatever they want. They have been shutting down coal powered generation through out Missouri and are seeking to decommission the Callaway Nuclear generating facility as well. These have all proven to be dependable, stable energy resources and yet the general direction seems to be towards undependable "green" energy.

These new "green" energy sources destroy the environment and create many new problems particularly for local landowners. "Green" energy has been politicized and that never ends well for the common folks. This is a very big topic and not quite the direction I wish to go today.

I want to speak for myself as a small landowner and for others whose voices I heard in Milan. I do not trust that Ameren is being transparent with their intentions for what this new backbone of transmission will support in the future. I know because I have spoken with at least one large landowner in Grundy county who has signed up 630 acres for a possible solar farm that Ameren is pursuing and doing so quietly to the tune of over 4000 acres altogether. Ameren understands all too well that the local folks do not want to see these blights in their backyards. Ameren and others throw crazy monetary figures at landowners to entice them to sell out. Fairly disingenuous in my opinion and it leaves out the smaller landowners such as myself who will be stuck looking at the blights. I will also be stuck paying taxes on something I cannot use and cannot sell.

This new backbone that Ameren is proposing will not provide energy to anyone local by their own admission. The new push for large data centers to support AI is driving much of this deal. My understanding is that these data centers consume huge amounts of energy.

What happens to the folks who have lived on and worked their land for decades in many cases? What happens to someone like us, who purchased our rural, quiet home so we could enjoy the peace and quiet of the country? Now we get a possible sub-station and a big, shiny new transmission line in our backyard. Dreams and livelihoods will be destroyed by yet another huge entity seeking to push their will regardless of the cost.

Let's take Missouri in a different direction of using what we have responsibly and actually taking care of the folks who live in the rural areas as well. Let's not allow Ameren or any other large public utility or large corporation to steal Americans land and dreams from them. The pursuit of these unstable "green" energy means is not good for Missouri or the world as was demonstrated recently in Spain/Portugal when their grid went down. Please stop allowing Ameren and others like them to ruin good peoples lives with their empty promises.

Thank you,

Dawn McLaughlin

**From:** [John Sextro](#)  
**To:** [OPC Service](#); [pscinfo@psc.mo.gov](mailto:pscinfo@psc.mo.gov)  
**Subject:** DZTM Project and Local Hearing on Ameron Transmission lines across Northern Missouri- Land (12-9.2-31-08)  
**Date:** Friday, April 18, 2025 11:58:39 AM

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Dear Office of Public Counsel

I am sending this letter in an email because I cannot attend the public hearing on the 22nd or 23rd of April. I will be traveling in CT and not have access to get on a virtual call. I am submitting concerns and questions in regard to this 345-KV Transmission line through DeKalb County.

I like my electricity service and convenience, and realize the need for expansion, however, I have concerns around a few key areas. In 2020 I purchased my farm for enjoyment, beauty, and as an investment towards retirement. This new 345-KV project lowers the value of all three attributes.

The power company will expand to increase their capacity and their future income for years. By doing this expansion it will lower my property value significantly. In addition, it will take away the beauty of what was there, forever. Moving from the current system that is slightly visible, to a much taller system that can be seen from all four corners of my 110 acres. No future prospective buyer wants land with high power lines dominating every view, not to mention added health concerns or lumber that is striped away.

My farm represents part of my annual income and future retirement. Now due to this project, my investment will be defaced by Ameron and thus significantly reduced in its value affecting my personal income and future retirement.

What is being done to protect my farm's investment and future worth.

John Sextro  
(816) 588-6450