

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

In the Matter of the Application of Ameren)	
Transmission Company of Illinois for a)	
Certificate of Convenience and Necessity)	
under Section 393.170.1, RSMo, Relating)	File No. EA-2024-0302
to Transmission Investments in Northwest)	
and Northeast Missouri)	

**RESPONSE OF AMEREN TRANSMISSION COMPANY OF ILLINOIS
TO MARK HARDING REQUEST FOR COMMISSION ORDER**

COMES NOW Ameren Transmission Company of Illinois (ATXI or the Company), through its undersigned counsel, and for its response to Mark Harding’s Request for Commission Order filed June 30, 2025 (Request), states as follows:

1. The Request filed by Mr. Harding states, in its entirety, as follows: “COMES NOW Mark Harding respectfully submits the following: I request the Commission to order Ameren/ATXI to remove the DO-27 route from the Company’s Interactive map on their website OR alternatively instruct the Company that DO-27 is a viable option route for this CCN request.”

2. “Ameren” is not defined in the Request, but the instant proceeding was filed by ATXI, not any other “Ameren” entity, and no other “Ameren” entity is a party to this proceeding. To the extent the Request seeks relief against some entity other than ATXI it is improper and beyond the jurisdiction of the Missouri Public Service Commission (MPSC or Commission) in this proceeding.

3. As to the request to remove route DO-27, one of 28 route alternatives assessed by the Company as part of its route selection study (RSS) process but not proposed by the Company in its Application, from the Company’s interactive map on its website, the request has no legal basis and should be denied. The Request points to no statute or law supporting the requested relief and seeks relief which is beyond the jurisdiction of the Commission.

4. Nor does the Request mention the context of the display of DO-27 on the Company's interactive map. One of Staff's proposed conditions in its Recommendation in this proceeding is a requirement that ATXI, "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(K)(3), develop and maintain, using best efforts, 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." Joint Status Report, Appendix A, Condition 14 (March 7, 2025) (EFIS Item 68). Revised Condition 14 also provides as follows: "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." *Id.* (emphasis added). DO-27 was not proposed in ATXI's Application but was discussed in its pre-filed written direct testimony explaining its route selection process. *See* Direct Testimony of ATXI witness Mr. James Nicholas.

5. In addition, Revised Condition 13 recommended the Commission grant the CCN subject to holding a virtual local public hearing for those landowners along DO-27. The Commission granted the request and ordered a virtual local public hearing be held on January 16, 2025. Order Setting Local Public Hearing and Directing Notice (December 31, 2024) (EFIS Item 53).

6. ATXI included DO-27 on its interactive map prior to the additional local public hearing because it was consistent with the above-described conditions and so landowners along DO-27 would be aware of its location.

7. As to the request to instruct the Company that DO-27 is a viable option route for this CCN request, the Request offers no support or reasoning for this requested relief, and it should be denied. The Company has not proposed route alternative DO-27 in its application. At best, the relief sought in the Request regarding DO-27 is premature. ATXI also submits that any alternate route or route adjustment involving new parcels will raise significant notice issues. Accordingly, DO-27 is not a viable option at this time.

8. ATXI also notes that in its Response to Mark Harding Request for Clarification filed on June 18, 2025, as EFIS Item 119, it explained why Mr. Harding's argument that DO-27 was an alternate route lacked merit and was contrary to law. ATXI incorporates by reference its arguments presented in its Response to Mark Harding Request for Clarification. An order has not yet been issued regarding the Request for Clarification.

WHEREFORE, ATXI requests that the Commission deny the Request for Commission Order for the reasons stated above.

Dated: July 10, 2025

Respectfully submitted,

/s/ Carmen L. Fosco

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing document was mailed, hand-delivered, or transmitted by facsimile or electronic mail to counsel and *pro se* parties of record as reflected on the certified service list maintained by the Commission in its Electronic Filing Information System on July 10, 2025.

/s/. Carmen L. Fosco

Carmen L. Fosco