

## **Attachment A – Summary of Application Filing Requirements**

ATXI filed an Application pursuant to Section 393.170.1, RSMo, 20 CSR 4240-2.060 and 20 CSR 4240-20.045 for a Certificate of Convenience and Necessity (CCN) to construct, install, own, operate, maintain, and otherwise control and manage a new, approximately four-mile, 138-kV transmission line and associated facilities in Perry County, Missouri (the Project or Grand Tower Crossing Project).

### **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 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.

- A certified copy of ATXI's Certificate of Good Standing is attached to the Application as Appendix A.
- ATXI 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 2 noting that “ATXI is what is referred to as a transmission-only utility. It was initially created to help facilitate additional transmission development in Illinois. Today, ATXI generally pursues and develops transmission opportunities that create value for end-use customers, in the region in general, but that might not best fit into the project development portfolios of Ameren’s traditional incumbent utility subsidiaries, ATXI’s affiliates Union Electric Company, d/b/a Ameren Missouri, and Ameren Illinois.”
- 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.

- The required information is contained in paragraph 3 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 identifies the testimony of Eric C Paulek as demonstrating the Project is necessary and convenient for public service. 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.

- 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 stated in its application in paragraph 21, 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 Grand Tower Crossing (“GTX”) Project. 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).

- An amendment to the JDA has not yet been executed by the Project parties, although the parties have reached agreement in principle and the agreement's execution is imminent.

According to Paulek's direct testimony page 6 lines 16-19.

- 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 GTX Project is shown in Appendix C of the Application:
  - Appendix C: Final Proposed Route Grand Tower Crossing Project.pdf.
- 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 D to the Application. ATXI developed the list from GIS and public data. 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 Paulek. The estimated costs for the completion of the GTX Project be allocated to ATXI

and to the MISO AMMO Pricing Zone, were provided in the direct testimony of ATXI witness Paulek. ATXI estimates that the total cost to construct the GTX Project, is between \*\* [REDACTED] \*\* and \*\* [REDACTED] \*\*.

- 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 GTX Project's schedule, including the projected beginning of construction date and the anticipated fully operational and used for service date of the GTX Project, was provided in the direct testimony of ATXI witness Paulek page 16 line 21- page 18 lines 1-13. ATXI intends to commence construction of the GTX Project by Fall of 2026 and anticipates that those projects will be in service by December 31, 2028.<sup>1</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 GTX Project in the Application Paragraph 20 (e).
- ATXI has satisfied this requirement.

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

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<sup>1</sup> EA-2025-0222 Application Paragraph 20.

- ATXI's plans for financing the New Facilities were provided and explained in the direct testimony of ATXI witness Paulek page 22 line 18- page 24 line 23.
- 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 Paulek page 13 line 6- page 14 line 21.
- 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 Paulek page 25 line 18-page 26 line 17.
- 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 Paulek page 26 line 7- page 27 line 14.
- 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 witness Spurlock provided a copy in Schedule JS-03 Confidential to listing all directly affected landowners.
- ATXI has satisfied this requirement.