

**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 Public Convenience and	)	
Necessity to Construct, Install, Own, Operate,	)	Case No. EA-2025-0222
Maintain, and Otherwise Control and Manage	)	
A 138-kV Transmission Line in Perry County,	)	
Missouri	)	

**MOTION FOR LEAVE TO FILE RESPONSE TO
OFFICE OF PUBLIC COUNSEL’S REQUEST FOR CONDITIONS**

COMES NOW Ameren Transmission Company of Illinois (ATXI) and requests leave to file a response to the October 24, 2025 request by the Office of Public Counsel to impose certain conditions on the Certificate of Convenience and Necessity (CCN) that ATXI requests in this proceeding. In support of its motion, ATXI states as follows:

1. After obtaining a two-week extension of time to respond, OPC filed its Response to Staff Recommendation on October 24, 2025.
2. In its response, OPC requests that this Commission impose two conditions on the CCN requested in this case before granting it to ATXI.
3. Both conditions ask the Commission to dictate particular easement language in the standard easement that ATXI uses to negotiate rights with the landowner. The first condition asks the Commission to impose line voltage language in the easement; the second asks the Commission to

remove certain language regarding third-party use of the line from the easement, and presumably, from the negotiation process with the landowner. Importantly, OPC argues that the easement language regarding third-party use violates Missouri law. ATXI disputes this assertion.

4. ATXI requests that it be granted an additional five business days within which to respond to OPC's request for conditions, thereby making ATXI's response to these requests due Friday, October 31, 2025.

5. This request is not being made to hinder or otherwise delay the proceeding.

WHEREFORE, ATXI respectfully requests that the Commission issue its order granting ATXI five business days within which it may file its response to the requested conditions, setting the deadline for such a response on Friday, October 31, 2025.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing will be emailed to all counsel of record this 24th day of October 2025.

/s/ Michael R. Tripp