

Exhibit No. 12

ATXI – Exhibit 12
Testimony of Tara Green
Direct
File No. EA-2024-0302

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MISSOURI PUBLIC SERVICE COMMISSION

FILE NO. EA-2024-0302

DIRECT TESTIMONY

OF

TARA GREEN

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

St. Louis, Missouri
July, 2024

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DIRECT TESTIMONY

OF

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I. INTRODUCTION AND BACKGROUND

Q. Please state your name and business address.

A. My name is Tara Green. My business address is 1901 Choteau Ave., St. Louis, Missouri 63103.

Q. By whom are you employed and in what capacity?

A. I am employed by Ameren Services Company (Ameren Services) as a Real Estate Specialist in the Real Estate Department.

Q. What are your responsibilities as Real Estate Specialist?

A. My current job responsibilities include leading and coordinating real estate requirements for linear transmission line projects. In this role, I coordinate and manage all required real estate activities for transmission line projects on behalf of Ameren Corporation's (Ameren) transmission-owning utilities, including Ameren Transmission Company of Illinois (ATXI). Those real estate activities include, among other responsibilities, surveys, appraisals, acquisition of land rights and permits, construction support, and damage settlements.

Q. Please describe your educational and professional background.

A. I graduated with a Bachelor of Applied Management in 2007 and maintain a Real Estate Managing Broker License in Illinois. In 2014, I became a member of the International Right of Way Association (IRWA) and currently serve as the International Director for Chapter 37 (2023

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– 2024) as well as Secretary / Treasurer for Region 3 of the IRWA (2023 – 2025) and hold an RWA designation. In 2023, I became an active member of the American Society of Farm Managers and Rural Appraisers (ASFMRA) for the Illinois Chapter.

On February 19, 2014, I started working for Ameren in the Real Estate Department as a Real Estate Agent, then promoted to Senior Real Estate Agent in 2015, and am currently a Real Estate Specialist leading electric transmission projects with varying degrees of cost and complexity. During my career with Ameren, I have been real estate lead for the Vegetation Reclamation Program as well as multiple construction maintenance projects to ensure the reliability of our infrastructure.

Q. Have you previously testified before the Missouri Public Service Commission?

A. No. However, I have testified before the Illinois Commerce Commission in several proceedings on behalf of ATXI and Ameren Illinois Company.

II. PURPOSE OF TESTIMONY AND SCHEDULES

Q. Are you familiar with the electric transmission project that ATXI proposes in this proceeding?

A. Yes. ATXI is working to build a more reliable and resilient energy grid for the future, and to construct, acquire, and operate certain transmission assets as part of the Northern Missouri Grid Transformation Program (Program) described in the direct testimony of ATXI witness Shawn E. Schukar. This application concerns the first phase of the Program (Phase 1), which encompasses two projects: the Fairport-Denny-Iowa/Missouri Border Project (FDIM) and the Maywood-Mississippi River Crossing Project (MMRX). In this proceeding, ATXI is requesting certain approvals from the Commission to make the Program a reality and deliver its benefits to

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Missouri electricity customers. Although it is my understanding that the entire Program must be approved and constructed for its benefits to be fully realized, Phase 1 of the Program is broken down into the two Projects to align with the corresponding MISO projects, and for ease of discussion in ATXI's application is further broken down into line segments and substation components:

Phase 1 Line Segments

- FDIM
 - Fairport to Denny
 - Denny to the Iowa/Missouri Border
- MMRX
 - Maywood to Palmyra
 - Palmyra to the Mississippi River Crossing

Phase 1 Substation

- Denny (new)
- Maywood (upgrades)

FDIM includes the construction of approximately 44 miles of 345-kV transmission line and a new 345-kv substation and will route through DeKalb, Gentry, and Worth counties. The Fairport to Denny line segment is a new 1 mile, 345 kV transmission line from a new four-position ring bus substation to be named Denny in northwest Missouri to Associated Electric Cooperative Incorporated's (AECI) existing Fairport Substation in DeKalb County, Missouri. The Denny to Iowa/Missouri Border line segment is a new, 43 mile 345 kV transmission line from Denny Substation going north to the Iowa/Missouri border.

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MMRX includes the construction of approximately nine miles of 345-kv transmission line from ATXI's existing Maywood Substation to the Mississippi River Missouri/Illinois border and upgrades to the Maywood Substation.¹ The Maywood to Palmyra line segment is a three mile line segment which will repurpose an existing ATXI 345 kV line/conductor for the new MMRX 345 kV circuit, and relocate that repurposed 345 kV circuit to a new right-of-way paralleling an existing ATXI double circuit transmission line from the Maywood Substation to a point near AECI's Palmyra Substation. The Palmyra to the Mississippi River Crossing line segment is an approximately six-mile line segment from the point near Palmyra Substation to the Mississippi River crossing at the Missouri/Illinois border, rebuilding an existing Ameren Missouri 161 kV transmission line as a double circuit line along its existing corridor and co-locating with the new 345 kV circuit. The Phase 1 Projects are described in more detail in the direct testimonies of ATXI witnesses Tracy Dencker and Adam Molitor.

Q. Please explain the Ameren Services' Real Estate Department's role and responsibilities related to the Phase 1 Projects.

A. The Ameren Services Real Estate Department supports all real estate efforts related to the Phase 1 Projects. We are a part of a team that includes, among other members, external consultants devoted to developing the route for the Phase 1 Projects. We assist in, plan for, and otherwise support open houses and other public outreach for the Phase 1 Projects. Additionally, we will support acquiring the land rights needed to construct the Phase 1 Projects through arms-length negotiations with landowners. We also support obtaining the non-environmental permits

¹ No additional real estate is required for Maywood Substation as the scope of work at Maywood does not require expansion onto new property.

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1 needed to construct the Phase 1 Projects through consultations with agencies. And we work to
2 address settlement and to restore real estate in the unintended and unlikely event of damages that
3 may occur during the construction process.

4 **Q. What is the purpose of your direct testimony in this proceeding?**

5 A. I address real estate matters concerning the Phase 1 Projects. Specifically, I cover
6 three topics. First, I explain the miles and width of the right-of-way required for the Phase 1
7 Projects' transmission lines and I describe the area traversed by the lines. Second, I generally
8 explain the land rights that ATXI will need to construct the Phase 1 Projects. Finally, I explain the
9 potential effect that the Phase 1 Projects may have on landowners' property, and how Ameren
10 Services will mitigate that effect.

11 **Q. Are you sponsoring any schedules with your direct testimony?**

12 A. Yes. I am sponsoring:

- 13 • Schedule TG-D1 – Legal Description for the FDIM Project's Proposed Route;
- 14 • Schedule TG-D2 – Legal Description for the MMRX Project's Proposed Route;
- 15 • Schedule TG-D3 (**Confidential**) – Landowner List; and
- 16 • Schedule TG-D4 – Agricultural Land (AG) Impact Mitigation Plan.

17 **Q. Are you offering any legal opinions in your direct testimony?**

18 A. No. Although I refer to and offer my lay understanding of several Missouri
19 regulations related to the Phase 1 Projects, I am not an attorney and none of my direct testimony
20 is intended to offer any legal opinions.

III. LAND RIGHTS NEEDED FOR THE PROJECT

A. Generally

Q. What is your understanding of the Proposed Route for the Phase 1 Projects?

A. ATXI witness Mr. Nicholas explains the route that ATXI is proposing for the Phase 1 Projects (its Proposed Route). ATXI's Proposed Route for the Phase 1 Project's transmission lines is shown on the map attached to ATXI witness Mr. Molitor's direct testimony as Schedule AM-D1. Schedules TG-D1 and TG-D2, which are attached to my testimony, are the legal descriptions for the Proposed Route's 150-foot-wide corridor relating to FDIM and the legal description for the Proposed Route's 150-foot-wide corridor on the Palmyra to the Mississippi River Crossing line segment, and 100-foot wide corridor along the 3 mile Maywood to Palmyra line segment of MMRX.

Q. Please generally describe the area to be traversed by the Proposed Route.

A. The land traversed by the Phase 1 Projects' transmission lines would be mainly agricultural. Both row crop and pastureland are the dominant land uses in these areas.

Q. Will easements be required for the 150-foot and 100-foot corridors along the Proposed Route?

A. Yes. I describe those more fully below.

Q. Will any other land rights be needed to construct the Phase 1 Projects?

A. Yes, most likely. Depending on site circumstances, off-easement access rights, such as temporary easements required during the construction process, may be needed. Further, ATXI may need ingress and egress rights for future access to the transmission lines to safely operate and

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1 maintain the facilities. The standard easement agreement that the Ameren Services Real Estate
2 Department uses to acquire easement rights covers these access, ingress, and egress rights.

3 **Q. What is the minimum right-of-way width that would be required for**
4 **construction easements, if any are needed?**

5 A. During the installation of the wires, the construction contractor may need to set up
6 equipment off the right-of-way for the lines. Depending on where this might occur, there may be
7 a need for construction easements, which would be up to and including an additional 150 feet in
8 width.

9 **Q. What about access rights to maintain vegetation near the transmission lines?**

10 A. Vegetation management is necessary for the reliability of the lines and public safety.
11 Accordingly, the Ameren Services Real Estate Department's standard easement agreement
12 contains language that allows it to trim, cut, clear, and remove trees and shrubs on or near the
13 easement area that may endanger the safety of or interfere with the right to maintain the reliability
14 of the transmission line.

15 **Q. What is the status of the land rights acquisition for the Project?**

16 A. As I explain further below, ATXI will not pursue easements from landowners until
17 it obtains its certificate and other approvals from the Commission.

B. FDIM Project

Q. What land rights are required for the FDIM line segments (Fairport to Denny and Denny to the Iowa/Missouri border)?

A. To accommodate the construction and future maintenance of these segments, ATXI will need to acquire 150-foot-wide easements, including easement rights for the installation and maintenance of below-grade communication line or lines consisting of wires, cables, conduits, fixtures, appliances, and other appurtenances thereto, including above-ground cabinets and field markers along with all necessary and appurtenant land rights, for approximately 44 miles of line.

Q. Why is a 150-foot-wide right-of-way width needed for the FDIM Project?

A. A 150-foot-wide right-of-way is the typical right-of-way width for 345 kilovolt (kV) transmission line and the minimum width required to construct and safely maintain the line for the Proposed Route's length. ATXI witness Adam Molitor explains the reasons for selecting the 150-foot width further in his direct testimony.

Q. How many parcels of property and landowners will be affected along this segment?

A. As shown on Schedule TG-D3, approximately 158 parcels of property will be affected along this segment, affecting approximately 103 landowners. ATXI owns one parcel along this route which will be the future Denny Substation site.

Q. What land rights does ATXI require for the Denny Substation?

A. ATXI has purchased, in fee, 40 acres of property to be used for the Denny Substation.

1 **C. MMRX Project**

2 **Q. What land rights are required for the MMRX Project?**

3 A. The Maywood to Palmyra line segment will require a 100-foot-wide easement, as
4 ATXI has existing rights and can overlap its existing easement in this area. The Palmyra to
5 Mississippi River Crossing line segment will require a 150-foot-wide easement. Ameren Missouri
6 currently has land rights in this area, however, ATXI will be obtaining its own land rights on top
7 of these existing easement areas to accommodate this new circuit.

8 **Q. How many parcels of property and landowners will be affected along these**
9 **segments?**

10 A. As shown on Schedule TG-D3, approximately 34 parcels of property will be
11 affected along the MMRX segments, affecting approximately 25 landowners.

12 **Q. Will ATXI require additional land rights for the Maywood Substation?**

13 A. No. As previously noted, ATXI has sufficient land rights for the modifications at
14 Maywood Substation, and, as I understand it, the scope of work there is taking place within the
15 fence.

16 **IV. LANDOWNER NOTICE AND LAND RIGHTS ACQUISITION PROCESS**

17 **Q. What is Schedule TG-D3 (Confidential)?**

18 A. Schedule TG-D3 (**Confidential**) is a list containing the name and address of each
19 owner of record of the land upon or across which ATXI proposes to construct the Phase 1 Projects,
20 and obtain a permanent easement or other permanent property interest, as disclosed by the county
21 assessors offices' records, as of not more than 60 days prior to the date notice was provided to such

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landowners, as I discuss below, of the application. The landowner list in Schedule TG-D3 (Confidential) also includes the names of all owners of land within 300 feet on each side of the centerline of the transmission lines (or a 600-foot wide notification corridor), in compliance with the requirements of 20 CSR 4240-20.045(6)(K)(1). For the purposes of this proceeding, ATXI has also included parcel numbers on the list, as many landowners own more than one parcel along the Proposed Route.

Q. Have the landowners listed on Schedule TG-D3 (Confidential) been notified about the Phase 1 Projects?

A. Yes, ATXI mailed all landowners within the Study Area for the Program postcard notices regarding the Phase 1 Projects. Additionally, ATXI witness Ms. Dettmers explains that letters have been sent to all affected landowners pursuant to 20 CSR 4240-20.045(6)(K)(1).

Q. Did ATXI invite these landowners to be involved in the siting of the Program's transmission lines?

A. Yes, ATXI invited these landowners to participate in the public outreach and routing processes through in-person open houses, a virtual open house, and a Program website, all of which provided feedback opportunities for landowners, as explained by Ms. Dettmers.

Q. Have potentially affected landowners been notified about right-of-way easement acquisition?

A. ATXI has not yet begun negotiating right-of-way easements for Phase 1. ATXI intends to begin negotiations with landowners once Commission approvals are received and the route is certain.

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1 **Q. How will ATXI acquire the easement rights that they need to construct the**
2 **Program's transmission lines?**

3 A. After a certificate order and other Commission approvals are received, Ameren
4 Services Real Estate Department representatives will contact the owners of the land from whom
5 easement rights are needed to construct the Phase 1 Projects' transmission and communication
6 lines to negotiate purchase of the required easements. Each landowner will be assigned to one land
7 acquisition representative contact. These representatives initially will contact the landowners in
8 person, if possible.

9 **Q. What information will be given to landowners at that time?**

10 A. The representatives will explain to the landowners the reason for the contact and
11 the purpose of the Phase 1 Projects, and they will answer any questions the landowners might have.
12 In addition, the representatives will give the landowners at that initial meeting a written statement
13 of the purpose of the Phase 1 Projects, a small-scale map and aerial photography of the easement
14 area needed, the acreage and length of the easement needed, and information regarding the type
15 and location of the facilities that will be constructed or moved within the easement area, as
16 appropriate. Landowners will also be provided a copy of a proposed easement purchase agreement
17 and/or the easement document.

18 **Q. Will Ameren Services personnel offer to purchase the easements at that initial**
19 **meeting?**

20 A. It will depend on whether the easement is in an area where there is existing Ameren
21 Missouri transmission infrastructure and, as such, Ameren Missouri presently holds an easement
22 there, or whether the easement is in an area not yet traversed by a transmission line. In the former,

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1 “brownfield” case, generally yes, compensation will be offered and Ameren Services will explain
2 the basis of the offer. In the latter, “greenfield” case, the purpose of the initial meeting will be to
3 obtain survey permissions. Upon further survey and field studies, Ameren Services will begin
4 negotiations with greenfield landowners and explain the basis of the offer as explained above in a
5 similar fashion as the brownfield negotiations.

6 **Q. How will the Ameren Services Real Estate Department determine the**
7 **compensation that it will offer to landowners to acquire easements for the Phase 1 Projects’**
8 **transmission lines?**

9 A. Although the Ameren Services Real Estate Department has not yet determined
10 specifically what compensation it will offer for any particular easement needed to construct the
11 lines, the compensation offer will be based on valuation data provided by a third-party independent
12 licensed appraiser. Ameren Services intends to obtain an overall market study for each county it
13 traverses covering the route for the Phase 1 Projects’ transmission lines that is approved by the
14 Commission. The Ameren Services Real Estate Department will review any third-party appraisals
15 that landowners provide it during negotiations. In addition, Ameren Services representatives will
16 be available to discuss the easement purchase with each landowner, as needed.

17 **Q. Will ATXI need eminent domain authority to construct the Phase 1 Projects?**

18 A. It is ATXI’s goal to obtain the land rights needed for the Phase 1 Projects by
19 negotiation. However, if negotiations are not successful, ATXI may need to pursue condemnation.
20 The Ameren Services Real Estate Department will make all reasonable efforts to acquire the
21 necessary land rights by negotiation, and will seek to exercise eminent domain only if determined
22 that land rights cannot be acquired through negotiation.

1 **V. POSSIBLE PROPERTY DAMAGE: MITIGATION AND REMEDIATION**

2 **Q. How will ATXI address damage to private property, if any, resulting from**
3 **construction related to the Phase 1 Projects?**

4 A. The Ameren Services Real Estate Department is responsible for the restoration of,
5 or payment for, any damages to landowners' and tenants' property, including crops, caused by the
6 construction. Initially, pre-payment for damages may be offered to landowners at the time of
7 easement negotiations. Ameren Services personnel will also notify each landowner before
8 construction commences on their property. Then, upon completion of construction, Ameren
9 Services will assess the property for any damage not repaired or previously compensated for. The
10 Ameren Services Real Estate Department will also provide each landowner an Ameren Services
11 representative to contact to report damages, if any, and to work with towards mutually agreeable
12 remediation or compensation. Please refer to Schedule TG-D4 for ATXI's proposed AG Impact
13 Mitigation Plan.

14 **Q. Will landowners be compensated for any property damage caused by future**
15 **maintenance of the Phase 1 Projects' transmission lines?**

16 A. The standard language in the easement that the Ameren Services Real Estate
17 Department uses provides that the transmission facilities' owner shall be responsible for actual
18 damages occurring on the easement area as a result of the construction, operation, maintenance, or
19 repair of the Phase 1 Projects' facilities, and shall, at its discretion, either repair and restore or
20 reimburse the owner for such loss or damages.

**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 and Approval)
to Transfer an Interest in Transmission Assets)
Under 393.190.1, RSMo relating to)
Transmission Investments in Northwest and)
Northeast Missouri.)

File No. EA-2024-0302

AFFIDAVIT

1. My name is Tara Green. I am a Real Estate Specialist in the Real Estate Department for Ameren Services Company, which is a subsidiary of Ameren Corporation and an affiliate of Ameren Transmission Company of Illinois, the Applicant in the above-captioned proceeding.

2. I have read the above and foregoing Direct Testimony and the statements contained therein are true and correct to the best of my information, knowledge, and belief.

3. I am authorized to make this statement on behalf of Ameren Transmission Company of Illinois.

4. Under penalty of perjury, I declare that the foregoing is true and correct to the best of my knowledge and belief.

/s/ Tara Green

Tara Green
Real Estate Specialist, Real Estate
Department, for Ameren Services Company

On behalf of Ameren Transmission
Company of Illinois

Date: *July 16, 2024*