

Exhibit No. 820

Mark Harding – Exhibit 820
Data Request Harding 13
File No. EA-2024-0302

Ameren Transmission Company of Illinois
Response to Intervenor's Data Request - Harding
EA-2024-0302

Application of ATXI for a Certificate of Convenience and Necessity under Section 393.170.1,
RSMo. relating to Transmission Investments in Northwest and Northeast Missouri

Dated Submitted: July 23, 2025

No.: Harding 13

PHYSICAL INSPECTION OF REROUTE AREA AT 46 HWY

(A) At anytime between April 9 and May 15 2024, did ATXI or its consultants physically visit any of the parcels shown in the map below? Specifically within the area 150' either way of the centerline of the DO-28 as seen currently on Ameren.com interactive map for this project.

Landowners for the parcels in the photo below are identified within ATXI as follows:

1. [REDACTED]
2. [REDACTED]
3. [REDACTED]
4. [REDACTED]



(B) Other than the July 5 2024 letter, did ATXI or its consultants make any effort to contact any of the landowners of these properties between April 9 and July 16 2024?

(C) Were the efforts to contact (if any) successful?

If yes, please provide the dates of the contact and the methods used and a brief description of the engagement.

If ATXI did not make any attempt to contact these landowners, please explain why not.

Note: The green line in the photo dissecting these 4 properties is the DO 28 route at 46 highway approximately 3 1/2 miles east of Grant City Missouri as currently displayed on Ameren.com

RESPONSE

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ATXI objects to this data request on the grounds that it was not properly served on counsel for ATXI. ATXI also objects to this data request on the grounds and to the extent that it is vague, ambiguous, confusing, overly broad, or unduly burdensome, or assumes, suggests, or implies that ATXI or its consultants had a right of entry agreement or any right to enter upon any of the parcels referenced in this data request, or assumes, suggests, or implies a legal or other requirement to contact landowners beyond the notices required by Missouri Public Service Commission rules. ATXI also objects to the vague and ambiguous reference to the unidentified map embedded in the data request, which is not a copy of the interactive map available on the Company's Project website as implied and suggested by the data request, as well as the undefined reference to landowners "identified within ATXI." ATXI also objects to this data request on the grounds that it seeks information related to matters which are beyond the scope of the grant of intervention to Mr. Harding which was limited per the *Order Regarding Applications To Intervene and Directing Filing Of Procedural Schedule* issued May 7, 2025, to "the issue of routing concerns affecting [his] property," and as such asks for information that is not relevant and is unlikely to lead to the discovery of admissible evidence.

Subject to and without waiving the foregoing objections, ATXI responds as follows:

(A) ATXI and/or its consultants did conduct field review as part of its routing analysis.

However, ATXI did not, and currently does not, have the rights to access private property, and, therefore, would not have been allowed to physically visit any of the parcels

specifically within the area 150 feet either way of the centerline of the DO-28 route during the time period referenced in this request.

(B) ATXI and its consultants sent open house invitations on March 20, 2024, to all of the landowners in question (with the exception of [REDACTED], who was mailed notice of filing on November 7, 2024) to invite them to the April 9, 2024 open houses in Grant City, Worth County. ATXI and its consultants sought to engage with any and all potentially affected landowners at this open house public meeting. (See ATXI Schedule LD-D1 at 1, 4). In addition, ATXI also published advertisements in local newspapers in each county where the FDIM Project is located, including Worth County, announcing the in-person open houses and online engagement opportunities. Each ad ran once a week for three weeks prior to the open houses to inform the landowners and the general public of these upcoming events. These ads are included in ATXI Schedule LD-D1 (at pp. 24-27). ATXI also issued a press release announcing the schedule for its open houses on April 8, 2024. This press release is included in ATXI Schedule LD-D1 (at p. 28).

(C) The the term "success" is vague, ambiguous, and undefined, and as such it is unclear what standard or metric the request seeks to apply to assess the effectiveness of its notification methods. However, in response to the ATXI's outreach efforts, 34 persons attended the Worth County open houses on April 9, 2024, and 9 public comments were received from these events. (See ATXI Schedule LD-D1 at 1-2). All comments from the open houses and through the period in question are documented in ATXI's Response to Staff Data Request No. 0025 Attach (CONFIDENTIAL).