## Exhibit No. 828

## Ameren Transmission Company of Illinois Response to Intervenors'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: September 22, 2025

No.: Harding 36A

Here find a data request served on ATXI:

Referencing the attached maps:

A: What is the distance in linear feet from the residence (residence #4 in attachment "Structures.pdf") to the centerline of each of the following:

- 1. Harding Modification 2 (see MPSC 57.0 attach)
- 2. Harding Modification 3 (see MPSC 57.0 attach)

B: What is the distance in linear feet from the residence (residence #3 in attachment "Structures.pdf") to the centerlines of each of the following:

- 1. Harding Modification 2 (see MPSC 57.0 attach)
- 2. Harding Modification 3 (see MPSC 57.0 attach)

C: What is the distance in linear feet from each of the residences (residences #5 and #6 in attachment "Structures.pdf") to the centerline of the following:

1. Proposed Route DO-28 (see MPSC 57.0 attach)

## RESPONSE

" Prepared By: James Nicholas

Title: TRC Companies, Inc. - VP of National Energy Siting and Permitting

Phone No.: 513-235-9654

ATXI objects to this data request on the grounds and to the extent that it is vague, ambiguous, and confusing, including with respect to its use of names to identify referenced attachments which do not fully match the names of those attachments. ATXI also objects to this data request on the grounds and to the extent 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:

ATXI understands the references to "MPSC 57.0 attach" to mean "MPSC 57.0 Attach 1 (CONFIDENTIAL)." ATXI's responses reflect this understanding. ATXI also notes that the structure labeled 6 appears to be a barn rather than a residence.

- A.1. The distance in linear feet from residence #4 to the centerline of Harding Modification 2 is approximately 622 feet.
- A.2. The distance in linear feet from residence #4 to the centerline of Harding Modification 3 is approximately 622 feet.
- B.1. The distance in linear feet from residence #3 to the centerline of Harding Modification 2 is approximately 1,135 feet.
- B.2. The distance in linear feet from residence #3 to the centerline of Harding Modification 3 is approximately 1,135 feet.
- C.1. The distance in linear feet from structure #5 to the centerline of DO28 is approximately 750 feet. The distance in linear feet from structure #6 to the centerline of DO28 is approximately 740 feet.



