

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of the Application of Union	)	
Electric Company d/b/a Ameren	)	
Missouri Company for a Certificate of	)	
Convenience and Necessity to Construct,	)	
Own, Operate and Maintain Upgrades to	)	File No. EA-2026-0058
the Transmission System in Montgomery	)	
and Callaway Counties, Missouri.	)	
	)	

**MOTION TO INTERVENE  
BY THE HADEN FAMILY TRUST**

COMES NOW the Haden Family Trust dated February 14, 2008 (the “Haden Family Trust”), and pursuant to Rule 20 CSR 4240-2.075 respectfully moves for intervention as a party in this matter. In support of this application, the Haden Family Trust states as follows:

1. The Haden Family Trust owns real property in Callaway County, Missouri that will be directly impacted by the line proposed by Union Electric Company d/b/a Ameren Missouri (“Ameren”) in its Application for a certificate of convenience and necessity for the Montgomery-Callaway Connector Project (the “Project”), as such term is defined in the Application.
2. Correspondence, communications, orders and the decision in this matter should be addressed to Missouri Soybean Association’s attorney Brent Haden at:

Brent E. Haden  
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827 E. Broadway, Suite B  
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3. On November 18, 2025, the Commission issued an Order directing interested parties to move to intervene in this matter by December 12, 2025, and thus this Application is timely.
4. As a landowner that will be directly impacted by the Project, the Haden Family Trust is *opposed* to the granting of a CCN in this matter. As a preliminary matter, Ameren's own Application and attendant testimony makes clear that this Project is only proposed to service the Tiger Connector Project for Grain Belt Express, LLC, which in turn is a project which to this date has yet to begin construction and may not ever be constructed. At the very least this Application is premature at best.

In addition, given that it has become ever more clear that Grain Belt Express, LLC's Tiger Connector Project will not bring any benefit to the state of Missouri or its citizens, the CCN requested for the Project at issue in this matter clearly does not meet any statutory or precedential requirement for the granting of a CCN under Missouri law.

Ameren has also clearly disregarded and acted indifferently to the rights and interests of private property owners along the proposed route of the Project. Ameren's employees and agents acted dishonestly at landowner meetings preceding the filing of the Application, and the testimony of its own siting expert makes clear that Ameren has prioritized its own interests and the interest of the government over any consideration of landowner rights in this matter.

The Haden Family Trust moves for intervention in this matter to protect its interests from abuse by Ameren through the Project. The Haden Family Trust also moves to intervene to incidentally protect the public at large from abuse by Ameren through a zealous and vigorous litigation of the claims at issue in this matter.

5. The interest of Haden Family Trust, as a landowner along the Project's proposed line, has an interest in this matter that is clearly different than the public interest and may be adversely affected by a final order in Ameren's favor.
6. The Haden Family Trust ***opposes*** the Application filed by Ameren and reserves the right to provide the Commission with more detailed positions on the Haden Family Trust's proposals and testimony submitted in this case, and in opposition to Ameren's Application.
7. The Haden Family Trust also believes that its intervention and participation in this proceeding would serve the public interest by clarifying the issues under consideration, ensuring completeness of the record, and assisting the Commission in its decision-making in this case. The Haden Family Trust moves to become a party to this case for all purposes.

WHEREFORE, the Haden Family Trust respectfully requests that the Commission grant its Motion to Intervene in this matter, entitling it to fully participate in this proceeding.

Respectfully submitted,

HADEN & COLBERT LLC



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Dated: December 3, 2025

### **CERTIFICATE OF SERVICE**

I hereby certify the copies of the foregoing have been mailed, e-mailed or hand delivered to all parties on the official service list for this case on this 3<sup>rd</sup> day of December, 2025.

A handwritten signature in blue ink, appearing to read "Brent E. Haden", is positioned above a horizontal line.

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Brent E. Haden, Mo. Bar No. 54148