## 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.	)	
•	)	

## APPLICATION TO INTERVENE BY MISSOURI FARM BUREAU FEDERATION

COMES NOW the Missouri Farm Bureau Federation ("MOFB"), by and through undersigned counsel, and pursuant to Rule 20 CSR 4240-2.075 respectfully applies for intervention as a party in this matter. In support of this application, Missouri Farm Bureau Federation states as follows:

- 1. On November 10, 2025, Union Electric Company d/b/a Ameren Missouri ("Ameren") filed an "Application for Certificate of Convenience and Necessity to Construct, Own, Operate and Maintain Upgrades to the Transmission System in Montgomery and Callaway Counties" ("Ameren's Application") authorizing Ameren to (1) construct, install, own, operate, control, manage and maintain approximately 28 miles of new 345 kV transmission line and any associated necessary facilities to connect to the Burns substation in Callaway County to the Montgomery substation in Montgomery County, (2) because the new double circuit line is required to connect Grain Belt Express, LLC's Tiger Connector Transmission Line to the Burns substation.
- 2. 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.

- 3. The Missouri Farm Bureau Federation is a nonprofit corporation in good standing organized under the laws of Missouri. MOFB is the state's largest and oldest general agricultural organization, with a mission to improve the quality of life for Missouri's farmers and ranchers and all rural Missourians. MOFB has over 157,000 members statewide, 141 offices in 113 counties, and each county Farm Bureau is run by its local members.
- 4. Correspondence, communications, orders and the decision in this matter should be addressed to MOFB's counsel Kayden Guymon at:

Kayden K. Guymon MISSOURI FARM BUREAU FEDERATION 701 S. Country Club Dr. Jefferson City, MO 65102 (573) 893-1409 kayden.guymon@mofb.org

- 5. Missouri Farm Bureau Federation has long defended property owners and property rights in cases involving takings of farms or ranches using eminent domain and is therefore 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 to this date, is a project which has yet to begin construction and may not ever be constructed. Thus, as the very least, this Application is premature at best. In addition, given that it has become ever clearer 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.
- 6. The interest of MOFB and its members, and MOFB's position as a protector of property rights for farmers and ranchers, are different than the public interest and may be adversely affected by a final order in Ameren's favor.

7. MOFB *opposes* the Application filed by Ameren and reserves the right to provide

the Commission with more detailed positions on Ameren's proposals and testimony submitted in

this case, and in opposition to Ameren's Application.

8. MOFB believes that its intervention and participation on behalf of its members 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, and MOFB wishes to become a party to this case for all purposes.

WHEREFORE, Missouri Farm Bureau Federation respectfully requests that the

Commission grant its Application to Intervene in this matter, entitling it to fully participate in this

proceeding.

Respectfully submitted,

MISSOURI FARM BUREAU FEDERATION

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Dated: December 12, 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 12<sup>th</sup> day of December, 2025.

Kayden K. Guymon, Mo. Bar No. 71908

Kajdu K. Lynnon