

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

ILLINOIS POWER COMPANY, )  
d/b/a AmerenIP, and )  
AMEREN ILLINOIS TRANSMISSION COMPANY )  
) )  
Petition for (i) a Certificate of Public Convenience and )  
Necessity, pursuant to Section 8-406(a) of the Public )  
Utilities Act; (ii) a Certificate of Public Convenience )  
and Necessity, pursuant to Section 8-406 of the Public )  
Utilities Act, authorizing construction, operation and )  
maintenance of new 345,000 volt electric lines in )  
Monroe, Randolph, St. Clair, and Washington Counties, )  
Illinois; (iii) an order pursuant to Section 8-503 of the )  
Public Utilities Act approving construction of new )  
transmission facilities; (iv) approval of an Agreement )  
between affiliated interests; and (v) other relief as may )  
be necessary. )

Docket No. 06-0179

**MOTION FOR LEAVE TO FILE REVISED EXHIBITS**

Illinois Power Company d/b/a AmerenIP ("AmerenIP") and Ameren Illinois Transmission Company (together, "Ameren"), pursuant to 83 Ill. Admin. Code Sections 200.190(a) and 200.875(c), hereby move for leave to file, as late-filed exhibits, AmerenIP Exhibits 3.1A (Revised), 3.1B (Revised), 3.1C (Revised) and 6.1A (Revised) ("Revised Exhibits," filed concurrently herewith). In support of this motion, Ameren states as follows:

1. AmerenIP Exhibits 3.1A, 3.1B and 3.1C are legal descriptions of the primary proposed (green), first alternate (brown), and second alternate (red) routes for the Baldwin-Rush Island transmission line route, as filed March 3, 2006. AmerenIP Exhibit 6.1A is the legal description of the revised primary (green) route for the Baldwin-Rush Island line, as filed May 9, 2006.

2. Section 200.875(c) of the Commission's rules provides, "Nothing in this Section shall be construed to limit the discretion of the Hearing Examiner or Commission, for good cause

shown, to consider late-filed exhibits for admission into evidence." 83 Ill. Admin. Code § 200.875(c). As explained below, Ameren has good cause to request the admission of the Revised Exhibits.

3. In the process of preparing AmerenIP Exhibit 18.0, which depicts Staff's proposed route for the Baldwin-Rush Island route of the transmission lines, Ameren became aware that the previously filed legal descriptions for the Baldwin-Rush Island line were not correct. The Revised Exhibits reflect the correct legal descriptions for the Baldwin-Rush Island line. A copy of each of the Revised Exhibits, showing the changes from the previously filed versions in redline form, is included as Appendix A hereto

4. Ameren requests, in order to ensure the completeness and accuracy of the record, that the Revised Exhibits be accepted as late-filed exhibits in this proceeding. Nothing in the Revised Exhibits alters the location of the primary and alternate routes of the Baldwin-Rush Island line as shown in AmerenIP Exhibits 3.1 and 6.1, or changes the number or identity of landowners affected by the routes. Ameren believes that the Revised Exhibits do not represent a material change to the evidence of record in this proceeding, and that the filing of the Revised Exhibits will not prejudice any party.

WHEREFORE, for the above reasons, Illinois Power Company d/b/a AmerenIP and Ameren Illinois Transmission Company request leave to file AmerenIP Exhibits 3.1A (Revised), 3.1B (Revised), 3.1C (Revised) and 6.1A (Revised) as late-filed exhibits in this proceeding.

Dated: December 21, 2006

Respectfully submitted,

ILLINOIS POWER COMPANY d/b/a  
AmerenIP, and  
AMEREN ILLINOIS TRANSMISSION  
COMPANY

By: /s/ Albert D. Sturtevant  
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