

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Power Company	)	
d/b/a AmerenIP	)	
and Ameren Illinois Transmission Company	)	
	)	06-0706
Petition for a Certificate of Public Convenience and	)	
Necessity, pursuant to Section 8-406 of the Illinois	)	
Public Utilities Act, to construct, operate and	)	
maintain new 138,000 volt electric lines in LaSalle	)	
County, Illinois	)	

CHIEF CLERK'S OFFICE  
 2007 FEB - 8 A 11: 14  
 ILLINOIS  
 COMMERCE COMMISSION

**PETITION FOR LEAVE TO INTERVENE**

Patricia Leary, as Executor of the estate of Margaret M. Kennedy and Trustee of the Margaret M. Kennedy Declaration of Trust dated June 24, 1997 (the "Margaret M. Kennedy 1997 Trust), pursuant to §200.200 of the Rules of Practice of the Illinois Commerce Commission (83 Ill. Admin. Code, 200.200), respectfully seeks leave to intervene and to be made a party in the above-captioned proceeding. In support of this Petition for Leave to Intervene, Patricia Leary states as follows:

1. The Margaret M Kennedy 1997 Trust owns farmland located in Wallace Township, Ottawa, Illinois, and legally described in Exhibit A, attached hereto (the "Property"), which Property is located within the LaSalle to Wedron to Ottawa 138kV electric transmission line/distribution facilities proposed by Illinois Power Company, d/b/a AmerenIP.
2. The Property is within the City of Ottawa planning area.
3. The City of Ottawa is in the process of adopting a revised Comprehensive Master Land Use Plan that reflects the Property as being residential.
4. A ruling by the Commission in this proceeding will affect the rights and interests of the Margaret M. Kennedy Trust and the Property, in that it would significantly adversely affect the use of the Property for residential purposes.

5. The proposed location of the electric transmission line intersects and divides the said property causing additional and further property devaluation.
6. No other party can adequately represent the interests of the Margaret M. Kennedy 1997 Trust in this docket, and therefore, Patricia Leary wishes to participate in the proceeding and present the position of the Margaret M. Kennedy 1997 Trust on this issue.
7. Patricia Leary requests that she be added to the service list in this proceeding as follows:

Patricia Leary  
301 W. Union Ave.  
Wheaton, IL 60187  
630-730-0634 (phone)

7. In compliance with Section 200.200(a) of the Commission's Rules of Practice, Patricia Leary states that she agrees to accept service by electronic means as provided in Section 200.1050 at the above email address.

WHEREFORE, Patricia Leary requests that she be permitted to intervene in this matter and be treated as a party to this proceeding pursuant to Section 200.200 of the Commission's Rules of Practice. This request is made and dated February 5, 2007

Respectfully Submitted,

Patricia Leary, as Executor of the Margaret M. Kennedy Estate and Trustee of the Margaret M. Kennedy Declaration of Trust dated June 24, 1997

By: \_\_\_\_\_

Patricia Leary

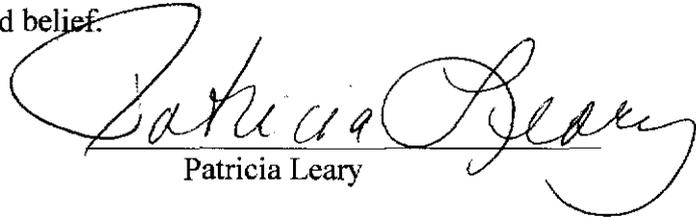
As Executor of the Margaret M.  
Kennedy estate and Trustee of the  
Margaret M. Kennedy Declaration of  
Trust, dated June 24, 1997

Patricia Leary  
301 W. Union Ave.  
Wheaton, IL 60187  
630-730-0634 (phone)

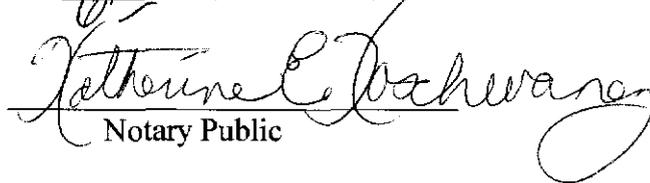
State of Illinois )  
 ) ss  
County of DuPage )

**VERIFICATION**

Patricia Leary, being first duly sworn, deposes and says that he is the Executor of the Margaret M. Kennedy estate and Trustee for the Margaret M. Kennedy Declaration of Trust dated June 24, 1997; that she has read the foregoing Petition for Leave to Intervene and knows the contents thereof; and that the statements therein contained are true to the best of her knowledge, information and belief.

  
Patricia Leary

Subscribed and sworn to before me  
this 6<sup>th</sup> day of February 2007.

  
Notary Public



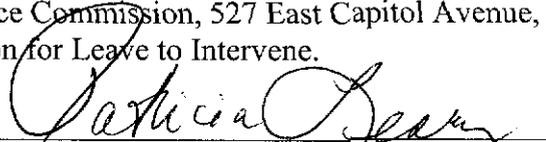
**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Power Company	)	
d/b/a AmerenIP	)	
and Ameren Illinois Transmission Company	)	
	)	06-0706
Petition for a Certificate of Public Convenience and	)	
Necessity, pursuant to Section 8-406 of the Illinois	)	
Public Utilities Act, to construct, operate and	)	
maintain new 138,000 volt electric lines in LaSalle	)	
County, Illinois	)	

**NOTICE OF FILING**

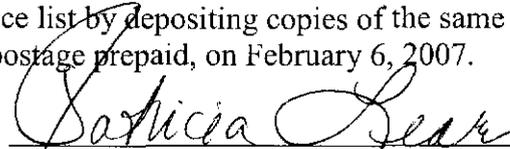
To The Service List Attached:

PLEASE TAKE NOTICE that on this date, February 6, 2007, I sent via FedEx for filing with the Chief Clerk of Illinois Commerce Commission, 527 East Capitol Avenue, Springfield, Illinois 62701, the attached Petition for Leave to Intervene.

  
\_\_\_\_\_  
Patricia Leary, as Executor of the  
Estate and Trustee of the Margaret  
M. Kennedy Declaration of Trust  
dated June 24, 1997

**CERTIFICATION OF SERVICE**

I hereby certify that copies of the foregoing Petition for Leave to Intervene were served upon the parties on the attached service list by depositing copies of the same in the U.S. Mail in Naperville, Illinois, first class postage prepaid, on February 6, 2007.

  
\_\_\_\_\_  
Patricia Leary, as Executor and Trustee

Patricia Leary  
301 West Union Avenue  
Wheaton, Illinois 60187  
630-730-0634  
trishleary@aol.com

Reports Menu

**Browse a Docket**

HELP

[Change](#) | [Docket Details](#) | [Docket Sheet](#) | [Staff Assigned](#) | **[Service List](#)** | [Case Schedule](#) | [Documents](#)ILLINOIS COMMERCE COMMISSION  
Service List in 06-0706 for 2/6/2007[Home](#) | [Add to Favorites](#) | [Mailing Labels](#)

Address	Type	Party of Record	Date Added	Date Removed
Frederick J. Blue 3168 E. 9th Rd. Utica, IL 61373	INT	Yes	11/16/2006	
John L. Cantlin Atty. for Robert B. and Linda J. Dolder John L. Cantlin and Associates 760 E. Etna Rd. Ottawa, IL 61350  E-Mail: <a href="mailto:cantlin@cantlinlaw.com">cantlin@cantlinlaw.com</a>	INT	Yes	1/10/2007	
Erika Dominick Paralegal Legal Dept. Ameren Services Company (m/c 1310) 1901 Chouteau Ave. St. Louis, MO 63103  E-Mail: <a href="mailto:edominick@ameren.com">edominick@ameren.com</a>	MIS	Yes	11/3/2006	
Edward C. Fitzhenry Ameren Services Company PO Box 66149 (M/C 1310) 1901 Chouteau Ave. St. Louis, MO 63166-6149  E-Mail: <a href="mailto:efitzhenry@ameren.com">efitzhenry@ameren.com</a>	PET	Yes	11/1/2006	
Christopher W. Flynn Atty. for Applicants Jones Day 77 W. Wacker, Ste. 3500 Chicago, IL 60601-1692  E-Mail: <a href="mailto:cwflynn@jonesday.com">cwflynn@jonesday.com</a>	PET	Yes	11/1/2006	
Troy A. Fodor	INT	Yes	1/23/2007	

Atty. for IMEA  
Troy A. Fodor, P.C.  
913 S. Sixth St.  
Springfield, IL 62703

E-Mail: [troyafodor@aol.com](mailto:troyafodor@aol.com)

---

E. M. Fulton Jr. Atty. for IMEA Troy A. Fodor, P.C. 913 S. Sixth St. Springfield, IL 62703	INT	Yes	1/23/2007
--	-----	-----	-----------

---

Ron Linkenback Case Manager Illinois Commerce Commission 527 E. Capitol Ave. Springfield, IL 62701	MIS	Yes	11/17/2006
--	-----	-----	------------

E-Mail: [rlinkenb@icc.illinois.gov](mailto:rlinkenb@icc.illinois.gov)

---

Eric M. Madiar Atty. for Illinois 71 Resistors Freeborn & Peters LLP 217 E. Monroe St., Ste. 202 Springfield, IL 62701	INT	Yes	12/29/2006
--	-----	-----	------------

E-Mail: [emadiar@freebornpeters.com](mailto:emadiar@freebornpeters.com)

---

Joseph D. Murphy Atty. for Intervenors Meyer Capel, a Professional Corporation 306 W. Church St. PO Box 6750 Champaign, IL 61826-6750	INT	Yes	11/28/2006
--	-----	-----	------------

E-Mail: [jmurphy@meyercapel.com](mailto:jmurphy@meyercapel.com)

---

James V. Olivero Office of General Counsel Illinois Commerce Commission 527 E. Capitol Ave. Springfield, IL 62701	MIS	Yes	11/9/2006
---	-----	-----	-----------

E-Mail: [jolivero@icc.illinois.gov](mailto:jolivero@icc.illinois.gov)

---

Michael J. Scotti III Atty. for Illinois 71 Resistors Freeborn & Peters LLP 217 E. Monroe St., Ste. 202 Springfield, IL 62701	INT	Yes	12/29/2006
---	-----	-----	------------

E-Mail: [mjscotti@freebornpeters.com](mailto:mjscotti@freebornpeters.com)

---

Michael S. Seneca	INT	Yes	11/16/2006
-------------------	-----	-----	------------

Atty. for SHOCK  
 Howard & Howard Attorneys, P.C.  
 211 Fulton, Ste. 600  
 Peoria, IL 61602

E-Mail: [mss@h2law.com](mailto:mss@h2law.com)

William M. Shay Atty. for SHOCK Howard & Howard Attorneys P.C. One Technology Plaza 211 Fulton St., Ste. 600 Peoria, IL 61602	INT	Yes	11/16/2006
--	-----	-----	------------

E-Mail: [wms@h2law.com](mailto:wms@h2law.com)

Albert D. Sturtevant Atty. for Applicants Jones Day 77 W. Wacker Chicago, IL 60601	PET	Yes	11/2/2006
--	-----	-----	-----------

E-Mail: [adsturtevant@jonesday.com](mailto:adsturtevant@jonesday.com)

Steven R. Sullivan Sr. Vice President Illinois Power Company d/b/a AmerenIP One Ameren Plz. 1901 Chouteau Ave. PO Box 66149, MC 1300 St. Louis, MO 63166-6149	PET	Yes	11/13/2006
---	-----	-----	------------

E-Mail: [srsullivan@ameren.com](mailto:srsullivan@ameren.com)

Jackie K. Voiles Illinois Power Company d/b/a AmerenIP 607 E. Adams St. Springfield, IL 62739	PET	Yes	11/13/2006
--	-----	-----	------------

E-Mail: [jvoiles@ameren.com](mailto:jvoiles@ameren.com)

Janis Von Qualen Office of General Counsel Illinois Commerce Commission 527 E. Capitol Ave. Springfield, IL 62701	MIS	Yes	11/9/2006
---	-----	-----	-----------

E-Mail: [jvonqual@icc.illinois.gov](mailto:jvonqual@icc.illinois.gov)

Service List Entries: 18