

AmerenIP's and Ameren Illinois Transmission Company's  
Response to PROTED 80 Data Requests  
ICC Docket No. 06-0706  
Petition for Certificate of Public Convenience and Necessity

- PROTED 80 No. 4.4:** It appears from a review of AmerenIP Exhibit 11.05 that, at the Maze Preserve, Ameren has placed PROTED 80 Alt 1 on the south side of the property line rather than the north side of the property line.
- a. Is there any reason that Ameren believes that PROTED 80 Alt 1 cannot be placed on the north side of property line at the Maze Preserve?
  - b. Explain every reason that Ameren placed PROTED 80 Alt 1 on the south side of the property line at the Maze Preserve.

- Response:**
- a. Objection. The data request presupposes that Ameren has some obligation to conduct additional analyses, studies or work with regard to PROTED's work product or position. Such is not the proper subject of discovery. Without waiving objection, theoretically, the line could be routed on north side of property line at the Maze Preserve. Ameren believes, however, that there are several reasons why good engineering practice would result in the PROTED 80 Alt 1 route being placed on the south side of the property line. The line was placed on the south side of the road just west of the Maze Woods reserve (North 34<sup>th</sup>) to avoid overbuilding the 34kV line located on the north side of the road that includes a 90 degree corner structure. The line was placed on the south side of the road just east of the Maze Woods reserve (North 3409) to avoid a residence that is located very close to the north side of the road.
  - b. See (a). The PROTED 80 Alt 1 route was located along the south side of the roads to the east and to the west of Maze Woods Reserve; however, the route was shifted to be placed along the property line for the cross-country portion that includes the Maze Woods Reserve. This was the same approach that Ameren used for the route alternatives that they proposed as well. In order to compare the PROTED 80 routes to the Ameren routes, Ameren used the same procedures for determining route location as they did for their own routes. This procedure includes using property lines for cross-country sections when possible and avoiding residences that fall either on or very close to the easement when feasible. The property lines that were used for the route placement was obtained from the LaSalle County GIS parcel database. The boundary of the Maze Woods Land and Water Reserve as shown Ameren IP Exhibit 11.05 was obtained

from the Illinois Department of Natural Resources and there appears to be discrepancy of about 20 feet in this area between the two databases. This could only be resolved by performing property corner surveys on these parcels after obtaining access permission.

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** (314) 206-0503  
**Date:** August 20, 2007

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Response to  
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Petition for Certificate of Public Convenience and Necessity

**RDL 1.26:** Describe how each criterion AmerenIP employed for the line routing and siting evaluation was determined and how AmerenIP prioritized each criterion.

**Response:** A range of objectives guided the selection of these transmission line routes and included, but were not limited to, the following:

- Length of the line
- Difficulty and cost of construction
- Difficulty and cost of operation and maintenance
- Environmental Impacts
- Impacts on historical resources
- Social and land use impacts
- Number of affected landowners and other stakeholders
- Proximity to homes and other structures
- Proximity to existing and planned development
- Community acceptance
- Visual impact
- Presence of existing corridors

Unfortunately, the simple act of listing criteria implies order of importance. In fact, not every criterion can be optimized, and compromises must be carefully chosen. Ameren believes that line routing cannot be reduced to weighting factors and the application of an arithmetic formula. Judgment must be applied, and will be ratified or modified during the course of approval.

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** (314) 205-0503  
**Date:** December 14, 2006

AmerenIP's and Ameren Illinois Transmission Company's  
Response to  
IL 71 Resistors' Data Request  
ICC Docket No. 06-0706  
Petition for Certificate of Public Convenience and Necessity

**IL 71**

**Resistors 3-6:** Please provide a copy of any documents in Ameren's possession that establishes the factors and/or criteria that Ameren personnel are required or recommended to consider when selecting or ranking the primary and alternative routes for proposed electric transmission lines.

**Response:** Ameren objects to this request on the grounds that it calls for a legal conclusion as to what factors and/or criteria are required to be considered. Subject to and without waiving this objection, Ameren responds as follows: Though not dispositive when selecting or ranking transmission routes, Ameren is mindful of a document produced by the ICC Staff to train new Staff engineers and to introduce the certification process to persons outside of the Commission. This document outlines the typical certification process, the information needed to be submitted, and contains a list of applicable laws and rules pertaining to certificate filings. See IL 71 Resistors 3-6 Attach A.

In order to comply with the applicable regulations and ICC Staff guidelines, Ameren has developed a series of data sheets that are used to ensure that the appropriate information is examined for each of the route alternatives. These data sheets are contained in the followings attachments:

- IL 71 Resistors 3-6 Attach B is the ICC Section 8-406 Hearings sheets which include the Project Construction & Cost Data Sheet, the Land Use Data Sheet, and the State Agency Compliance sheet.
- IL 71 Resistors 3-6 Attach C is the Data Sheets for Petitions to Illinois Commerce Commission.
- IL 71 Resistors 3-6 Attach D is the Agricultural Review Criteria.

These sheets are used as checklists for the routing data when completing ICC petition document and petition exhibits, the direct testimony exhibits, and the route matrices (AmerenIP Exhibits 3.3 and 4.3).

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** 314-206-0503  
**Date:** March 2, 2007

**Illinois Commerce Commission Staff**

# **Electric Transmission Line Certification Process**



**written by Brian Collins  
Electric Section - Engineering Department  
Energy Division**

**Revised March 2003**

# The Electric Transmission Line Certification Process

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# The Electric Transmission Line Certification Process

## Introduction

*This is not an official Illinois Commerce Commission document. It is intended to help train new Staff engineers and to introduce the certification process for persons outside the Commission. The only official documents relating to the certification process are the statutes and administrative rules referenced herein.*

This document will give the reader a better understanding of the typical processes in an electric transmission line certificate case. We explain how utilities decide when they need new transmission lines. We discuss the methods of studying electric transmission systems and capital improvements. We also explain the responsibilities and procedures of each Commission staff division involved in the processing of a certificate application. The filing phase, the local public forums, the public evidentiary hearings, and the staff investigations are covered. However, this is only a guide to the typical process. Each certificate application will have unique aspects.

This document is organized into sections related to the utilities and each staff division involved in the application process. In each section, we discuss laws and Commission rules that apply to that part of the process. Appendix A at the end of this document lists all laws and rules that apply to certificate filings.

## Electric Transmission Line Certificate Process

### Typical Utility Process

Electric utilities build new transmission lines when needed to help provide adequate, efficient, and reliable service to customers at the least cost. Utility engineers routinely study transmission systems to find out if they are meeting customers' needs. When a utility learns that it needs a new transmission line, it may file a request for a Certificate of Public Convenience and Necessity with the Commission. A utility files for a Certificate pursuant to Section 8-406 of the Illinois Public Utilities Act [220 ILCS 5/8-406]. The exact circumstances of the utility's new construction will help the utility decide if it needs a Certificate. A utility will file for a Certificate after it has performed many steps, such as analyzing its system and identifying any system areas that are weak; planning system improvements to correct the identified weak areas; studying various alternatives that will correct the system problems and choosing the least-cost alternative; and considering input from the community, public, and landowners regarding the utility's plan to solve its system problems.

#### ***What Electric Transmission Systems Do***

Since the beginning of the electric utility industry, utilities have built transmission systems to deliver electricity from their generating stations to their customers. Transmission lines historically served two purposes: (1) moving large amounts of electricity from the generating stations to the various regions of the utility's service territory and (2) moving power from regional feeders into local communities.

The transmission lines that move power from generating stations to service territory regions are called collectively the "grid". Utilities usually operate transmission grids at between 765,000 and 138,000 volts, with 345,000 and 138,000 volts being the most common. The grid gets its name from the pattern it makes on a map. The grid is a network of lines, each connected to other lines, to form a fishnet or spider web of

interconnected lines that can add to each other's capabilities and move electricity over many different paths from one location to another. If one line is out of service, the electricity can flow over other lines to get where it is needed.

Transmission lines that move electricity from regional grid lines into communities are not always backed up by other transmission lines. In some instances, a utility will extend a single transmission line into a community and terminate the line at a substation. This type of transmission line is called a radial line. Utilities usually operate radial lines at 138,000, 69,000, or 34,500 volts.

In other cases, transmission lines that move electricity from regional grid lines into communities are backed up by at least one additional line. A community with a transmission line running through it, to and from terminals in other communities, is served by such an arrangement, called a looped line. A looped line provides greater service reliability than a radial line, but can cost more. The term "looped" means that the transmission line is connected to a source of power at both ends with the load in the middle. With the necessary switches installed, the line can provide power to the community from either direction.

In the mid-1900s, utilities began to see advantages to connecting their transmission systems together to form multi-state grids. These were called regional power pools. The Mid-American Interconnected Network (MAIN) is a regional power pool and most Illinois utilities are members. The Mid-Continent Area Power Pool (MAPP) also reaches into the Quad Cities area of Illinois. These organizations are in the process of being replaced by independent system operators, but many of their purposes and goals will remain. The Federal Energy Regulatory Commission ("FERC") is in control of this change.

With the invention of regional power pools, transmission lines had a new job. Now they had to move electricity from outside a utility's system to customers inside a utility's system or from one utility, across a second utility's system, to a third utility. However,

utilities have considered the power pool function to be secondary to the transmission grid's main purpose of moving power from generators to customers within a utility service territory. Generally, utility grids have served the power pool function with only relatively minor modifications to existing lines. Utilities have built very few new transmission lines solely for purposes of interconnection and power pooling.

As competition and open access to transmission lines takes the place of price regulation of generation, transmission lines will have another new function. A utility grid will be called upon to delivery to a retail customer, inside the utility's service area, the electricity the retail customer has purchased from new sources, either inside or outside the utility's service area. A utility's grid will also be asked to move increasing amounts of electricity across the grid from off-system suppliers to off-system purchasers, both retail and wholesale. The existing utility grids could prove inadequate for this function. As utilities like CIPS found out in planning for the unusual 1997 summer electricity transfers brought on by numerous nuclear plant outages in the Midwest, FERC Order 888 forces utilities to accommodate movement of wholesale electricity transactions across their systems. This new development could change the way utilities plan to use their transmission systems.

### ***Transmission System Planning***

Utilities collect load data from each substation. Utility load forecasters consider these historic loads, past load growth rates, specific large-customer load changes (load increases or decreases), and local government forecasts to estimate the future load on each major substation component. For local loads, utility load forecasters may consider demographics; economic forecasts; population growth; household growth; employment growth; building permits; planned residential, commercial, and industrial developments; and local and regional long-range plans.

Utilities have complex computer programs that engineers use to study the operation of electric transmission grids. These computer models require large amounts of information about the transmission system, sources of electricity, and load forecasts.

These models tell engineers how much electricity is flowing through each component of the grid and the voltage level at each point on the grid. The engineers identify overloaded equipment and voltages outside the acceptable range. Engineers can also use these models to test the grid's ability to handle future load changes and equipment outage conditions. When engineers find a problem, they identify all possible alternative solutions to the problem and begin the next phase of planning.

### ***Planning Criteria***

A transmission system plan should meet the following criteria:

- Avoid equipment damage.
- Avoid widespread service interruptions, even when unplanned events occur.
- Provide a robust design that considers load forecast uncertainty and changes in system operating requirements.

Utility engineers must plan transmission systems to move needed electricity, without becoming overloaded or damaging equipment, while maintaining required voltage levels and remaining stable. Transmission systems must do these things under normal and emergency conditions with near perfect reliability.

### ***Limiting the Alternatives to Be Studied***

Among the alternatives to building a new transmission line are the switching load to lines carrying less load, upgrading existing lines, and a variety of demand-side management techniques. Utilities may not want to study every available alternative in detail. Some alternatives will be obviously uneconomical to the trained and experienced planner. Other alternatives may not meet all planning and design criteria. To be adequate an alternative must provide the needed capacity and voltage levels and must be achievable within the critical period. Alternatives must also fit into a utility's long-range plans to expand the transmission system.

### ***Choosing the Least-Cost Alternatives***

The method utilities use to compare the cost of alternatives is the Present Value of future Revenue Requirements study (PVRR). A PVRR study estimates the present

value of all investments and expenses for each alternative over a period that often extends 20 or more years into the future. Utilities will favor the alternative with the lowest PVRR unless some other critical factor is involved.

### ***Interaction with Community, the Public, and Landowners***

Most utilities recognize that the public is interested in electric transmission line projects and can often provide useful information that can help utilities avoid some intervener opposition before the Commission. Of course, the level of interaction between the utility and the public varies depending on the type of proposed transmission line, its proposed route, and whether the utility needs to purchase right-of-way. For example, the level of public interest in a new short 138,000 volt overhead line in a heavily industrialized or rural area will be substantially less than for a new overhead 345,000 volt line proposed for a major city street with mixed residential and commercial zoning.

Utilities commonly communicate with the public use meetings with local government officials and community leaders, newsletters, and public forums. For a very large project, a utility may use a formal community working group. In the community working group, the utility meets with a panel of government, civic, business, environmental, and educational leaders representing different interests, perspectives, and geographic areas in the region. The utility considers the group's suggestions before selecting a plan for submission to the Commission.

In cases where utilities must purchase rights-of-way for a proposed route, utilities conduct themselves in accordance with the Commission's Guidelines for Right-of-Way Acquisitions [83 Illinois Administrative Code Part 300]. For example, utilities distribute landowner information packets before approaching property owners from whom the utilities must, or reasonably anticipate that they must, acquire property rights. The packets include information about the nature of, and need for, utilities' proposals, as well as information about landowner's rights as enumerated in Part 300. The packets also advise landowners that a utility representative will be contacting them and identifies a utility person from whom they can obtain additional information in the meantime.

### ***Typical Right-of-Way Requirements***

Right-of-way requirements vary from line to line. In every case, however, utilities construct new lines in accordance with the Commission's rules for Construction of Electric Power and Communications Lines [83 Illinois Administrative Code Part 305], which adopt the standards of the National Electrical Safety Code ("NESC"). The NESC specifies minimum clearance requirements that will dictate the minimum width of required right-of-way.

### ***Route Selection***

The route selection process varies considerably from case to case. The necessary terminals of a line were identified by the utility during the planning process. In other words, to perform its function the line must begin and end at specific and non-negotiable locations, but the route the line takes to join these points subject to study and change. In choosing a route, utilities consider factors including topography, existing rights-of-way, ease and cost of right-of-way acquisition, ease of line construction and maintenance, existing and planned land use, etc. The Commission has stated its preference for routes using existing rights-of-way.

### ***Eminent Domain***

Utilities attempt to avoid condemnation of property. When a utility is unable to acquire right-of-way for its electric transmission line route, the utility will file a request with the Commission asking for the right to use eminent domain. Section 8-509 of the Public Utilities Act [220 ILCS 5/8-509] allows utilities to exercise the right of eminent domain as long as the utility has an order under Section 8-503 of the Illinois Public Utilities Act [220 ILCS 5/8-503]. This section of the Act orders a utility to construct its proposed electric transmission line. The utility must have a Commission order under Section 8-503 in addition to a Certificate before it can go to court and use eminent domain authority. In most cases where a utility foresees using the power of eminent domain, the utility in its application will simultaneously ask for a Commission order under Section 8-503 while seeking a Certificate under Section 8-406.

### ***The Certificate Filing***

When utilities have satisfied themselves that they have planned as well as they can and that they have considered landowner and public input appropriately, it is time to determine if they require a certificate of public convenience and necessity. This is often a hard question without a clear answer. The Public Utilities Act does not provide clear guidelines or criteria for projects requiring certificates. In the mid-1980s, the Commission's General Manager requested that all Illinois electric utilities seek Certificates for new lines operated at or above 138,000 volt. However, utilities are under no legal obligation to honor that request. Generally, utilities file for a certificate if a new high-voltage line will have its own supporting poles or towers and will not be attached to existing structures.

According to the Commission's Rules of Practice [83 Illinois Administrative Code Part 200], a utility can make its certificate filing with the Commission's Chief Clerk either with paper documents or by using the Commission's e-Docket system, which is publicly accessible using the Internet World Wide Web at <http://www.icc.state.il.us>. In the case of paper documents, the Chief Clerk will place the record of the case in the e-Docket database using an electronic document scanner.

## The Commission's Process

### **Chief Clerk**

When a utility files a Certificate application in accordance with Part 200, the Commission's Chief Clerk verifies that the application meets Commission requirements and begins processing as follows:

- assigning a docket number;
- scanning any paper application documents into the e-Docket system; and
- adding the application caption to the Report of Public Utility Daily Filings on the ICC E-mail bulletin Board.

The Commission's Chief Administrative Law Judge assigns an Administrative Law Judge ("ALJ") to the case.

The ALJ contacts the utility and the assigned Commission staff divisions to establish an agreed upon date, time, and location for the first status hearing. The Chief Clerk will verify that there is an available hearing room for each hearing and that the court reporting service is notified of each hearing. The Chief Clerk will also send a letter notifying all parties of the date, time, and location of the first hearing.

As hearings in the case progress, the Chief Clerk sends copies of the ALJ's rulings, hearing notices, continuances, notices of Commission actions, and the ALJ's Proposed Order to the parties. The Chief Clerk also takes and transcribes minutes of any Commission meetings concerning the application. When the Commission enters an order, the Chief Clerk sends copies to the parties.

If the utility or some other party decides to appeal the Commission's order, the Chief Clerk processes the notice of appeal. The Chief Clerk forwards appeal information to the Commission's Office of General Counsel, then types, duplicates, assembles, certifies, and mails the docket record to the reviewing court.

### ***Administrative Law Judge***

The ALJ contacts the Commission staff and the utility to set a status hearing date and time. The ALJ uses the status hearing to identify the parties that intend to be active in the proceeding and to set a schedule for the proceeding. Parties to a typical electric utility certificate application proceeding include the filing utility, the staff, and some number of interveners (usually owners of real-estate near the proposed route). At the status hearing, the ALJ works with the staff, the utility, and other parties to set a schedule for the filing of testimony and briefs and the cross-examination of witnesses.

During the period between the first status hearing and the filing of testimony, the parties engage in discovery of information from each other. Sometimes disputes arise. When they do, the ALJ settles the disputes by ruling on motions filed by the parties.

The ALJ works with the Chief Clerk to schedule Commission hearing rooms for future dates. When those dates arrive, the ALJ officiates while the parties take turns calling their witnesses and cross-examining the witnesses of other parties. When all parties have had an opportunity to enter evidence into the record, the ALJ marks the record "Heard and Taken". That means that the record is complete and no one can add evidence unless the Commission votes to reopen the record.

Following the evidentiary phase of the case, the ALJ sets a schedule to allow the parties to file legal briefs and to file replies to the legal briefs of the other parties. At that point, the docket is in the hands of the ALJ who must use the evidence in the record and the contents of the parties' legal briefs to write a Proposed Order granting or denying the application.

The ALJ must use Section 8-406 of the Public Utilities Act to decide if the utility has presented convincing evidence that the Commission should grant the application. Subsection 8-406(b) requires a utility to demonstrate three elements:

- the proposed construction is necessary to provide adequate, reliable, and efficient service to its customers and is the least-cost means of satisfying the service needs of its customers;
- the utility is capable of efficiently managing and supervising the construction process and has taken sufficient action to ensure adequate and efficient construction and supervision thereof; and
- the utility is capable of financing the proposed construction without significant adverse financial consequences for the utility or its customers.

After the ALJ finishes preparing the Proposed Order, the Chief Clerk sends the proposed order to the parties. Staff is not formally served with a copy of the proposed order. The parties then have an opportunity to file briefs that tell the ALJ where they think the Proposed Order should be changed. These briefs are called Briefs on Exceptions. Each party also has an opportunity to reply to every other party's Brief on Exceptions. The record of the case and all the parties' briefs are available to the Commission for its review.

After reviewing all the comments in the last round of briefs from the parties, the ALJ makes any needed changes to the proposed order before sending it to the Commission. The ALJ may also brief Commissioners on facts in the case in an open public meeting.

### ***Public Affairs Division***

The Public Affairs Division learns of new certificate filings through the weekly Manager's Meetings at the Commission.

When a utility files an application for an electric transmission line certificate of public convenience and necessity, the Public Affairs Division decides if it should hold public forums. In making that decision, the Public Affairs Division consults with the Executive Director and the Chief Administrative Law Judge and considers any recommendations from the Energy Division. If the Public Affairs Division decides that it should hold public forums, then it must decide how many to hold and where and when to hold them.

The amount of construction involved and the expected public reaction to the project affect the perceived need for public forums. If a member of the public or a government official requests a public forum, then the Public Affairs Division will most likely hold one.

A Public Affairs Division staff member officiates at public forums, explains how forums work, and introduces any utility officials available for questions. The first part of the public forum allows members of the public to make statements and be heard. Speakers are not sworn and the statements are not evidence, but a court reporter records all statements. The Chief Clerk places a copy of the transcript in the file for the docket. The transcripts are available for public inspection.

The second part of a public forum is to allow questions from the public and answers from the utility. No record is kept.

### ***Energy Division***

The Electric Section of the Engineering Department in the Energy Division assigns one or two staff engineers to work on new applications for electric transmission line certificates of public convenience and necessity. If two staff engineers are assigned, one engineer's assignment is limited to issues related to the route the utility is proposing for the line while the other engineer's assignment concerns the utility's reasons for building the line. If only one engineer is assigned he is responsible for both the need and route issues.

On a daily basis Engineering Department support staff review the report of daily public utility filings on the bulletin board and make note of any filings that may involve staff from the department. When an application for a transmission line appears in the daily filing report, the support staff will notify the Department Manager and the Electric Section Supervisor. After getting notice of the filing, the Electric Section Supervisor retrieves a copy of the application from e-Docket and reads it. The Electric Section

Supervisor will then make the staff assignments and notify the Manager and support staff. Support staff will then notify the Clerk's Office of the staff assignments.

The staff engineers assigned to the application read the application and any pre-filed testimony that accompanies the application. In most cases, the staff engineers will ask the Section Supervisor to request that an attorney from the Office of General Counsel be assigned to the application. The Section Supervisor forwards the request to the Manager of the Energy Division. The Manager sends the request to the Manager of the Office of General Counsel. Some time later, the staff engineers learn the name of the assigned staff attorney(s). If the staff engineers do not request an attorney, then the Manager of the Office of General Counsel does not assign an attorney to the application.

The staff engineer verifying the utility's reasons for building the line must use Section 8-406 of the Public Utilities Act as the criteria for deciding to support or oppose the utility's application. Subsection 8-406(b) requires a utility to demonstrate three elements:

- that the proposed project is necessary to provide adequate, reliable, and efficient service to the utility's customers at the least cost;
- that the utility is capable of efficiently managing and supervising the construction of the project and has taken sufficient action to ensure adequate and efficient supervision and construction thereof; and
- that the utility is capable of financing the construction of the project.

In addition to Subsection 8-406 (b), the staff engineer reviewing the route uses 83 Illinois Administrative Code Parts 300 and 305 and the Illinois Department of Agriculture's rules related to the Farmland Preservation Act [8 Illinois Administrative Code 700, Appendix J] as the criteria for supporting or opposing the proposed route of the electric transmission line. In a Certificate case, this staff engineer must determine if the electric line is reasonably routed to:

- inconvenience the fewest people to the least extent possible;

- minimize impact on farmland and the amount of land taken out of crop production;
- and serve potential customers.

While the following discussion outlines the major information required to review a utility's petition, the engineer must use his judgment as to additional information he may require.

After reading the application and the utility's direct testimony, staff engineers usually have several unanswered questions. To get answers, staff engineers write data request questions and send them to the assigned staff attorney. The staff attorney reads the questions and, after making any suggestions for improvement, sends the questions to the utility's attorney. After a period of weeks, the utility returns its answers through the reverse route. The staff engineers use the utility's answers to help evaluate the application.

If the data request answers do not clear up the staff engineers' questions, then they may decide to call the utility's witnesses and speak directly to them. Direct oral communication is sometimes a better tool for understanding an application, but it requires the staff engineers to take good notes to document the information exchange.

Staff engineers must also travel to the intended project site and examine the proposed route and the surrounding area. The engineer reviewing the route issues is interested in the route itself, any alternative routes that the utility has identified, any alternative routes that interveners have identified, and any additional alternative routes that seem worth investigating as the engineer inspects the area. The engineer verifying the need for the utility to construct the line is looking for physical evidence that supports or contradicts the facts included in the utility's explanation of the need for the line.

Staff engineers also attend all or most of the public forums held by the Public Affairs Division. Staff engineers listen to the public's questions and the utility's answers. They also listen to the statements made by members of the public and talk to those speakers

about topics that may deserve some further investigation. The staff engineers are seeking information that supports or contradicts the information that the utility has provided to them.

To determine if the application meets the first criteria in Subsection 8-406(b) of the Public Utilities Act (necessary to provide adequate, reliable, and efficient service), the staff engineer studies the evidence in the utility's direct testimony and identifies all conditions on the utility's system that the utility asserts are inadequate, unreliable, or inefficient. Examples of inadequacies are low voltage and utility equipment overloads. Examples of unreliable conditions are circuit loads too high to allow automatic transfers of load and old equipment nearing the end of its useful life. Utilities have not cited inefficiencies as reasons for building new transmission lines, but have cited inefficiencies as reasons to select one project over another. Examples of inefficiency have included increased maintenance costs and increased loss of energy in the lines (line losses).

After identifying the inadequacies or the unreliability that the utility lists as justification for the new line, the engineer must verify the facts concerning those conditions. To verify those conditions, the staff engineer relies on utility information about:

- historic loads on utility equipment;
- forecasted loads on utility equipment;
- historic voltage levels; and
- the utility's computerized load flow studies that predict the current and voltage on every piece of utility equipment on the system.

To verify the above information the engineer must request actual voltage or load data for selected pieces of equipment.

If the staff engineer concludes that conditions exist or will soon exist that prevent the utility from providing adequate and reliable service, then the need for some corrective

action is established. However, the staff engineer has not yet identified the least-cost corrective action. The staff engineer does not yet know if the project for which the utility has applied is the least-cost means of correcting the condition.

To identify the least-cost project, the staff engineer examines the list of alternative projects that the utility identified and studied. Then the staff engineer evaluates the utility's transmission system and the service area to see if there are other alternatives that the utility missed. If new alternatives exist, the staff engineer asks the utility to study them and determine if the proposed project is still the least-cost. Finally, the staff engineer verifies that the utility correctly completed its cost studies of each alternative. The Company provides the staff engineer with the numbers used in the cost studies of each alternative. The staff engineer's review ensures that the Company has used reasonable methods in completing its cost studies. As part of this review, the staff engineer should request support for specific costs in the study such as poles, conductor, insulators, etc. The engineer need not verify the support for all costs, but should spot check the cost of various items.

The tool that the staff engineer uses to identify the least-cost plan is the Present Value of future Revenue Requirements (PVRR) study. These studies allow engineers to consider all investments and costs on an equal basis, regardless of when they are incurred. The alternative with the lowest PVRR is the least-cost.

If the staff engineer agrees with the utility that the proposed project is the least-cost means for the utility to provide adequate and reliable service, then the staff engineer writes direct testimony that explains the staff investigation and supports the utility's application. If the staff engineer does not agree, then the staff engineer writes direct testimony that explains why the utility should not build the proposed project. The staff engineer's direct testimony may also make recommendations to the utility about altering its planned project so that it becomes the best plan.

For most Illinois electric utilities, the staff engineer will give only limited attention to the second criteria in Subsection 8-406(b) (capable of managing and supervising the construction). It seems obvious that a utility with hundreds or thousands of miles of existing transmission lines is quite able to manage and supervise the construction of new lines. However, the staff engineer will study the utility's direct testimony on this point and send data request questions if appropriate.

Engineers will not consider the third criteria in Subsection 8-406(b) (capable of financing the proposed construction). Staff financial analysts examine this issue, as detailed later.

The staff engineer reviewing the route must identify the information given to landowners as required under 83 Illinois Administrative Code Part 300. This staff engineer must also determine why the proposed route is better than any alternate routes. He does this by looking at any studies used to compare the proposed route to alternate routes and reviewing the criteria used to rank the alternatives and the procedure for ranking. If the utility performed no studies, he asks why.

This staff engineer looks for exhibits provided by the utility summarizing procedures used by the utility to obtain right-of-way.

As required by Section 305.60 of 83 Illinois Administrative 305, the staff engineer makes sure that the utility has identified all other utilities whose facilities may be adversely affected by the construction along the route. The staff engineer also identifies all wetland locations and designated flood plain areas and confirmed this information with the Illinois Department of Natural Resources, as required under the Interagency Wetland Policy Act of 1989 [20 ILCS 830] and the Rivers, Lakes and Streams Act [615 ILCS 5], and with the Army Corps of Engineers, as required under the Code of Federal Regulations; Title 33 – Navigation and Navigable Waters; Chapter II – Corps of Engineers, Department of the Army [33 CFR 203-384].

In addition, the staff engineer also identifies all parks, forest preserves, national forests, wildlife refuges, and scenic areas along the route and determines if the utility has the permission from the Department of Natural Resources for its proposed route to be near these locations. The engineer also verifies that the utility has terminated the Endangered Species Consultation Process with the Illinois Department of Natural Resources as well as required under Chapter 17 Illinois Administrative Code 1075, 530 ILCS 10/11 - Illinois Endangered Species Act and 525 ILCS 30/17 - Illinois Natural Areas Preservation Act.

The staff engineer verifies that the utility has consulted other state agencies for their approval of the utility's proposed route. The engineer verifies that the utility has obtained an Agricultural Impact Mitigation Agreement with the Illinois Department of Agriculture as required under 505 ILCS 75. The engineer checks to ensure that the utility has summarized the acres of land required for construction of the proposed electric line by current zoning classification (residential, commercial, industrial, farming, other.)

The engineer verifies that the utility has obtained all river, stream, and lake crossing permits from the U.S. Army Corps of Engineers as required under CFR 401 and from the Illinois Department of Transportation as required under 20 ILCS 830. In addition, the engineer verifies that the utility has identified any historic or archaeological areas requiring the Illinois Historical Agency's approval as required under 20 ILCS 3420.

The staff engineer also looks for evidence provided by the Company that ensures that the utility will construct, operate, and maintain the proposed electric transmission as required by the Commission in 83 Illinois Code Part 305. In this code part, the Commission has adopted the National Electric Safety Code as the standard for utilities to construct their proposed electric transmission lines.

The staff engineer reviewing the route also verifies that the utility has provided the required data per the Farmland Preservation Act [505 ILCS 75]. This data includes the following:

- what part of the route will be placed on public land and what part will be placed on private land;
- how many easements and fee simple acquisitions are required by the utility on privately owned land for both the proposed route and alternate routes;
- the width of the easement needed for the proposed route and alternate routes;
- the location of the easements and fee simple acquisitions required on privately owned land for the proposed route and alternate routes; and
- the current land use of the required easements and fee simple acquisitions on privately owned land.

The staff engineer also ensures that the utility has specified what steps it will take to repair and restore the land upon which the utility proposes to construct its electric transmission line as required under 505 ILCS 75. These steps as required by the Farmland Preservation Act include:

- identifying the amount of top cover that will be placed above any buried facilities;
- investigating for any field tile damaged by construction operations anywhere within the construction easements; and
- identifying methods the utility will employ in repairing damaged field tile, restoring soil productivity, restoring surface drainage, controlling excessive erosion both during and after construction, and removing all construction debris after construction is complete.

The utility must also explain its responsibility in correcting or compensating landowners for damages to private property or crops caused by construction and future maintenance or repair of the electric transmission line.

After the staff engineer responsible for reviewing the proposed route has considered all of the above criteria, and has examined all reasonable alternative routes, he writes

direct testimony either supporting or opposing the route chosen by the utility for its proposed electric transmission line.

After the staff engineers file their direct testimony, the utility or the interveners may ask them some data request questions. The staff engineers answer these questions to the best of their ability and in a timely fashion.

If necessary, the utility files its rebuttal testimony. The utility could be rebutting the positions of interveners or staff. After studying the utility's rebuttal testimony, the staff engineers may choose to send some additional data request questions to the utility.

The ALJ schedules the cross-examination hearing for a date a few weeks after the utility file its rebuttal testimony. At that hearing, the ALJ swears in every witness and presides over a courtroom-like proceeding where every party can ask questions of every other party's witnesses. A court reporter records every word spoken, except when the ALJ declares that the discussions are off the record. Even then, the ALJ usually summarizes the content of the off-the-record discussions for the record, when the ALJ goes back on the record. When every party has had an opportunity to ask all the questions they wish, the ALJ marks the record "Heard and Taken" and announces an agreed upon schedule for briefing the record.

After the last hearing, the staff engineers begin working on the staff's Initial Brief. The staff engineers will summarize the evidence relating to their issues and try to explain the staff's position to the ALJ in writing. When the staff engineers are finished writing the first draft of the staff brief, they send it to the assigned staff attorney. The staff attorney edits the brief, adds an introduction, and returns it to the staff for one last review. On or before the filing date, the staff attorney files the staff brief with the Chief Clerk and sends it to all other parties to the case.

If the Commission grants oral argument to the utility or an intervener, then the staff engineers work with the staff attorney to prepare an oral presentation that the staff

attorney will deliver to the Commission. The staff engineers attend the oral argument to help the staff attorney answer any questions that the Commissioners might ask. After oral argument, the staff engineers' active participation in the case is finished.

### ***Financial Analysis Division***

The Commission's Financial Analysis Division, Finance Department will assign an analyst to review the utilities evidence concerning the utility's capability of financing the proposed construction without significant adverse financial consequences for the utility or its customers, as required by Subsection 8-406(b) of the Public Utilities Act. Though his issues are fewer, the financial analyst's investigation methods will be similar to those explained above for engineers. The financial analyst will file direct testimony presenting his conclusions.

### ***Office of General Counsel***

The Commission's Office of General Counsel does not assign an attorney to an application for an electric transmission line certificate of public convenience and necessity unless the Energy Division makes a request. In nearly every case, the Energy Division will make the request.

The staff attorney assigned to the certificate case represents the staff at all hearings and assists staff in developing a schedule for the case. The staff attorney offers legal advice to the staff concerning certain issues in the Certificate case. The staff attorney reviews all staff data requests and written testimony. The staff attorney also writes the legal briefs with help from the engineers and financial analysts. On behalf of staff, the staff attorney also sends out staff data requests to utilities and interveners and helps staff obtain a timely response. The staff attorney files all staff testimony and briefs with the Commission's Chief Clerk using the e-Docket system and sends these documents to all other parties to the case.

During hearings, the staff attorney, with assistance from staff, writes questions and cross-examines both company and intervener witnesses. If the Commission grants oral

argument, the staff attorney prepares Staff's oral comments and presents them to the Commission.

### ***Commission***

After the ALJ has issued a Proposed Order, the Commission reviews it. In reviewing the ALJ's Proposed Order, the Commission has available to it all information contained on the case record, including all testimony and transcripts of the hearings. The Commission also has all briefs filed during the case available to it in making its decision.

The ALJ's Proposed Order outlines the issues in the case and contains the ALJ's recommendation on each issue. The Commission begins deliberations and, in open sessions, they discuss the issues in the case, the positions of the parties, and specifically, the ALJ's Proposed Order. The ALJ redrafts the Proposed Order as necessary to reflect Commission majority positions. The Commissioners vote on the Proposed Order during a Bench Session and then issue a Final Order.

## Appendix A

Here is a list of the laws and regulations governing certificates of Public Convenience and Necessity:

20 ILCS 830	Interagency Wetland Policy Act
20 ILCS 3420	Illinois State Agency Historic Resources Preservation Act
220 ILCS 5/8-406	Illinois Public Utilities Act, Certificates of Public Convenience and Necessity
220 ILCS 5/8-503	Illinois Public Utilities Act, Authority of ICC to Order Facilities Construction
220 ILCS 5/8-509	Illinois Public Utilities Act, Eminent Domain Authority
220 ILCS 5/8-510	Illinois Public Utilities Act, Land Surveys
505 ILCS 75	Farmland Preservation Act
520 ILCS 10/11	Illinois Endangered Species Protection Act
525 ILCS 30/17	Illinois Natural Areas Preservation Act
615 ILCS 5	Rivers Lakes and Streams Act
8 Ill. Adm. Code 700	Farmland Preservation Act
17 Ill. Adm. Code 1075	Consultation Procedures for Assessing Impacts of Agency Actions on Endangered and Threatened Species and Natural Areas
83 Ill. Adm. Code 200	Illinois Commerce Commission Rules of Practice
83 Ill. Adm. Code 300	Guidelines for Rights of Way Acquisition
83 Ill. Adm. Code 305	Construction of Electric Power and Communication Lines
33 CFR 203-384	Code of Federal Regulations; Title 33 – Navigation and Navigable Waters; Chapter II – Corps of Engineers, Department of the Army

## Appendix B

Here is a list of the events that take place during a routine application for a Certificate of Public Convenience and Necessity for an electric transmission line.

1. A utility determines that it has a need for additional electric transmission capacity and makes plans to construct new facilities.
2. The utility may choose to meet with members of local governments and with community leaders to explain its transmission line plans and involved local citizens in the planning process.
3. The utility may choose to discuss its plans with the staff of the Illinois Commerce Commission (“ICC”) as some point before it files an application for a Certificate.
4. When the utility selects its preferred transmission line route, it will send out information packets to land owners whose land may be under the new line.
5. The utility files its application for a certificate with the ICC’s Chief Clerk.
6. The ICC’s Chief Clerk assigns the application case a docket number.
7. From this point forward, parties interested in the case can file petitions to intervene.
8. An ICC Administrative Law Judge (“ALJ”) set a location, date, and time for a status hearing in the case and posts the notice. The location will be in either the Springfield or Chicago ICC headquarters building. The date is usually two to four weeks after the filing, and the time is usually about 10:00 A.M.
9. At the status hearing, the ALJ sets a schedule for the remainder of the case, at least through the testimony and hearings phases.
10. In some cases, but not in every case, the ICC will hold local public forums in communities affected by the utility’s plans. The purpose is to allow local citizens to make their opinions known and to ask questions of the utility, who will have representatives at the forum.
11. The utility files its written direct testimony on the date set by the ALJ (usually a few weeks after the status hearing).

12. The ICC staff and any interveners who choose to do so file written direct testimony on the date set by the ALJ (usually a few weeks after the utility files its direct testimony).
13. The utility files its written rebuttal testimony on the date set by the ALJ (usually two or three weeks after the ICC staff files its direct testimony).
14. The ICC's ALJ presides over a hearing where the attorneys for each party take turns asking cross-examination questions of each witness who filed testimony in the case.
15. All parties to the case file simultaneous initial briefs of the case on the date set by the ALJ (usually three or four weeks after the hearing ends).
16. All parties to the case file simultaneous reply briefs on the date set by the ALJ ( about ten days after the initial briefs are filed).
17. The ALJ issues a proposed order granting or denying the utility's application (no set time or time limit).
18. All parties to the case file simultaneous briefs on exceptions to the proposed order on the date set by the ALJ (usually two or three weeks after the proposed order is issued).
19. All parties to the case file simultaneous replies to exceptions on the date set by the ALJ ( about ten days after the briefs on exceptions are filed).
20. The ICC deliberates the issues in the case and passes an order ending the case.
21. From utility application to ICC order, the process can take several months to complete. Some cases have taken over one year.

**I.C.C. SECTION 8-406 HEARINGS**  
**Sheet No. 1 – Project Construction & Cost Data**

**ILLINOIS POWER COMPANY d/b/a AmerenIP**

Project: \_\_\_\_\_ Docket No. \_\_\_\_\_

Location: \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Route Information	Proposed Route (RED)	Alternate Route (BROWN)	Alternate Route (GREEN)
-------------------	----------------------	-------------------------	-------------------------

1. Length of Proposed Line in Miles:			
a) Average Span Length.....			
b) Maximum Span Length.....			
c) Average Pole Height.....			
d) Nominal Right-of-Way Width .....			

2. Estimated Project Costs:			
a) Cost of Proposed Line(s) .....	\$	\$	\$
b) Cost of Land and Right-of-Way.....	\$	\$	\$
c) Cost of Substation(s).....	\$	\$	\$
d) Other: _____	\$	\$	\$
e) Total Additional Costs .....	\$	\$	\$

3. Right-of-Way Information: (Easement/Fee)			
a) Total Number of Landowners.....			
b) Total Number of Parcels .....			
c) Landowners Signed as of _____,			
d) Parcels Signed as of _____,			
e) Percent Owners Signed as of _____,			
f) Percent Parcels Signed as of _____,			
g) Percent Mileage Signed as of _____,			

4. Other Utilities Within 500 Feet:			
a) _____			
b) _____			
c) _____			
d) _____			
e) _____			
f) _____			
g) _____			
h) _____			

**I.C.C. SECTION 8-406 HEARINGS**  
**Sheet No. 2 – Land Use Data**

**ILLINOIS POWER COMPANY d/b/a AmerenCIPS**

Project: \_\_\_\_\_ Docket No. \_\_\_\_\_

Location: \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Route Information	Proposed Route (RED)	Alternate Route (BROWN)	Alternate Route (GREEN)
-------------------	-------------------------	----------------------------	----------------------------

1. Type of Right-of-Way:

a) Public .....			
b) Private Easement.....			
c) Fee Simple .....			

2. Width of Right-of-Way (feet):

a) Total Width .....			
b) Distance from Centerline Easement to Edge of Public Right-of-Way .....			
c) Centerline of Easement is the Approximate Centerline of the Support Structure .....			

3. Present Land Use:  
(To Be Acquired by Easement) (Acres)

a) Cropland.....			
b) Pasture .....			
c) Timberland .....			
d) Other Agricultural .....			
e) Nonagricultural .....			

4. Present Land Use:  
(To Be Acquired by Fee) (Acres)

a) Cropland.....			
b) Pasture .....			
c) Timberland .....			
d) Other Agricultural .....			
e) Nonagricultural .....			

5. Direct benefits of the construction to the farms in the area of land used by the utility. \_\_\_\_\_  
 \_\_\_\_\_  
 \_\_\_\_\_

6. Land Adjacent/Parallel To:

a) Railroad Right-of-Way.....			
b) Highway Right-of-Way .....			
c) Drainage Ditches, Etc. ....			
d) Miscellaneous Other _____			

**I.C.C. SECTION 8-406 HEARINGS**  
**Sheet No. 3 – Land Use Data Continued**

**ILLINOIS POWER COMPANY d/b/a AmerenCIPS**

Project: \_\_\_\_\_ Docket No. \_\_\_\_\_

Location: \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Route Information	Proposed Route (RED)	Alternate Route (BROWN)	Alternate Route (GREEN)
-------------------	----------------------	-------------------------	-------------------------

7. Rivers and Other Waterways Crossed:

a) _____ River.....			
b) _____ River.....			
c) Other: _____			
d) Other: _____			

8. Major Highways Crossed:

a) Route _____			
b) Route _____			
c) Route _____			

9. Structures Within 200 Feet of Centerline of Line:

a) Occupied Houses.....			
b) Unoccupied Houses.....			
c) Barns and Farm Buildings.....			
d) Other Buildings: _____			
e) Miscellaneous Other: _____			

10. Anticipated Location of Support Structures:

a) Cropland.....			
b) Pasture.....			
c) Timberland.....			
d) Other Agricultural.....			
e) Public Right-of-Way.....			
f) Along or Within Utilization Lines (e.g. roads, field borders, grassy waterways, etc.).....			
g) Other: _____			

**I.C.C. SECTION 8-406 HEARINGS**  
**Sheet No. 4 – Land Use Data Continued**

**ILLINOIS POWER COMPANY d/b/a AmerenCIPS**

Project: \_\_\_\_\_ Docket No. \_\_\_\_\_

Location: \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Route Information	Proposed Route (RED)	Alternate Route (BROWN)	Alternate Route (GREEN)
-------------------	----------------------------	-------------------------------	-------------------------------

11. Damages to Private Property:

- a) Construction debris will be removed from the construction site upon completion of the job.....
- b) Ruts and alterations to surface drainage caused by the construction of this project will be resolved with the affected landowner(s) in a fair and equitable manner .....
- c) Significant erosion and/or measurable soil compaction to cropland, resulting from the construction of this project, will be resolved with the affected landowner(s) in a fair and equitable manner .....
- d) Drainage tiles which are damaged as a result of the construction of this project will be repaired using approved methods .....
- e) The commitment to correct damages to private property extends beyond the construction of this project, to associated construction, maintenance or repairs which may occur in the future .....


**I.C.C. SECTION 8-406 HEARINGS**  
**Sheet No. 5 – State Agency Compliance**

**ILLINOIS POWER COMPANY d/b/a AmerenCIPS**

Project: \_\_\_\_\_ Docket No. \_\_\_\_\_

Location: \_\_\_\_\_ Exhibit No. \_\_\_\_\_

Route Information	Proposed Route (RED)	Alternate Route (BROWN)	Alternate Route (GREEN)
-------------------	-------------------------	----------------------------	----------------------------

1. State Parks and Conservation Areas:

a) Line Crosses Thru.....			
b) Adjacent to Line .....			
c) Within 1 Mile of Line.....			
d) 1 to 5 Miles from Line.....			
e) Total of Above .....			

2. Airports and Restricted Landing Areas:

a) Adjacent to Line .....			
b) Within 1 Mile of Line.....			
c) 1 to 5 Miles from Line.....			
d) Total of Above .....			

3. Will proposed construction become a controlling obstruction to the use of the above airports as defined in FAA and State Regulations relative thereto?.....

--	--	--

4. Will the proposed line(s) follow or cross designated "flood plain" areas? .....

a) Will the line cause interference with said "flood plain" areas? .....		

5. With reference to the above matters, Company has letters of approval from:

a) Department of Conservation Division of Lands Management .....			
b) Illinois Historic Preservation Agency.....			
c) Department of Transportation Division of Aeronautics .....			
d) Illinois Institute of Natural Resources.....			

**DATA SHEET**  
**PETITIONS TO ILLINOIS COMMERCE COMMISSION**

1. Drawing No.
  
2. List the names of all railroads and public utility companies whose facilities will be or are crossed or paralleled within a distance of 200 feet by Company facilities. For facilities not owned by utility companies, list the name and address of the owner or owners. If a cooperative, partnership or switching service telephone line is involved which is represented by an officer, either secretary or president, list the name and address of such officer.

3. List all commercial airports, restricted landing strips, heliports, etc. within five miles of the Company project, the owner or administrator's name and address, the legal description of the location of the facility, the distance and direction of the facility, the distance and direction of the facility from the nearest point of the project, the direction of all runways and indicate whether or not the project will be the controlling obstacle to the approach of the runways and if not, why.





13. Estimated costs. (List line construction, retirement and maintenance cost for each phase of project such as voltage, type of construction, etc. Also list construction and retirement cost of each substation involved. List the cost of ROW and clearing for each phase of the project. Show the total cost for all phases of line, substation and ROW clearing and the total cost of the entire project).

14. Percent of total length right-of-way secured to date.

Number of property owners and number secured to date.

Provide list of property owners.

15. List all state parks, recreation areas, conservation areas, forests, etc. within five miles of project and what effect, if any, the project will have on each.

## AGRICULTURAL REVIEW CRITERIA FOR ELECTRIC TRANSMISSION PROJECTS

The factors listed below are areas of concern which need to be addressed in order for the Illinois Department of Agriculture to properly complete its review of the agricultural impacts associated with electric transmission projects.

For the project as a whole, the Department will require the following information:

1. Purpose of the proposed transmission line. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
2. Location map showing each alternative route. (See Map)
3. Origin and terminus points. (See Map)
4. Length (miles):  
Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_
5. Voltage to be carried. \_\_\_\_\_  
\_\_\_\_\_
6. Total cost of each alternative route:  
Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_
7. Type of support structures. \_\_\_\_\_  
\_\_\_\_\_
  - a. Alternative support structures which could be used (indicate preferred type).  
\_\_\_\_\_  
\_\_\_\_\_
  - b. Average cost of each structure type (including the cost of foundations).  
\_\_\_\_\_  
\_\_\_\_\_
  - c. Average span anticipated for each structure type.  
\_\_\_\_\_  
\_\_\_\_\_
  - d. Width of easement required for each structure type.  
\_\_\_\_\_  
\_\_\_\_\_

- e. Square feet of easement required for placement of each structure type.  
\_\_\_\_\_  
\_\_\_\_\_
- f. Description of the foundation required for each structure type. (If applicable)  
\_\_\_\_\_  
\_\_\_\_\_
8. Summary statement regarding the abandonment and removal of any transmission line that is being replaced. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
9. Damages to private property:
- a. Construction debris will be removed from the construction site upon completion of the job. Yes \_\_\_\_\_ No \_\_\_\_\_
  - b. Ruts and alterations to surface drainage caused by the construction of this project will be resolved with the affected landowner(s) in a fair and equitable manner. Yes \_\_\_\_\_ No \_\_\_\_\_
  - c. Significant erosion and/or measurable soil compaction to cropland, resulting from the construction of this project, will be resolved with the affected landowner(s) in a fair and equitable manner. Yes \_\_\_\_\_ No \_\_\_\_\_
  - d. Drainage tiles which are damaged as a result of the construction of this project will be repaired using approved methods. Yes \_\_\_\_\_ No \_\_\_\_\_
  - e. The commitment to correct damages to private property extends beyond the construction of this project, to associated construction, maintenance or repairs which may occur in the future. Yes \_\_\_\_\_ No \_\_\_\_\_
10. Utility's position on placement of guy wires for structures located on or near rowcrop land. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
11. Direct benefits of the proposed transmission line for the farming community in the immediate vicinity of the route. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_
12. Anticipated time schedule to be followed on project. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

13. Any other miscellaneous information unique to the project which may have a bearing upon the project's agricultural impacts. \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**ALTERNATIVE ROUTE**

For each alternative route, the Department will require the following information:

1. Number of farming units on which easements are required.

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

2. Will any land be purchased via fee simple acquisition? If so:

a. Location - \_\_\_\_\_

b. Acres - \_\_\_\_\_

c. Current land use - \_\_\_\_\_

d. Purpose for the land purchase - \_\_\_\_\_

\_\_\_\_\_

3. Will irrigated land be impacted? If so:

a. Location - \_\_\_\_\_

b. Acres - \_\_\_\_\_

4. Will any above-ground fixtures be required other than support structures? If so:

a. Location - \_\_\_\_\_

b. Size of land tract needed for each fixture. \_\_\_\_\_

\_\_\_\_\_

5. Anticipated number of support structures to be located on: (do for each structure type identified on part 7.a. of the previous page)

a. Rowcrop land:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

b. Pasture land:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

c. Woodland:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

d. Existing utilization lines:

1. Public right-of-way:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

2. Field borders:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

3. Fence rows:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

4. Farm roads:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

5. Other land:

Proposed - \_\_\_\_\_  
Alt. #1 - \_\_\_\_\_  
Alt. #2 - \_\_\_\_\_

AmerenIP's and Ameren Illinois Transmission Company's  
Response to  
Illinois Commerce Commission Data Requests  
ICC Docket No. 06-0706  
Petition for Certificate of Public Convenience and Necessity

- RDL 2.1:** Referencing Ameren's response to data request RDL 1.19(b):
- (a) Please provide a summary of public input Ameren received and considered in choosing the preferred route for the La Salle to Wedron 138kV line.
  - (b) Provide a summary of public input Ameren did not consider when choosing the preferred route for the La Salle to Wedron 138kV line.

**Response:** Refer to RDL 2.1 Attachment A "Ameren Log of Contacts", RDL 2.1 Attachment B "LaSalle-Wedron Public Workshop Questionnaire", and RDL 2.1 Attachment C "LaSalle-Wedron Public Workshop Comments".

All input received from meetings with local officials and interest groups, and individual contacts were taken into account in making a final route determination. RDL 2.1 Attachment A shows a compilation of contacts that Ameren has made during the routing process for this line.

More than 400 invitations to the Public Workshops held on March 29-30, 2006, at the North Waltham School were mailed out. Ameren's records indicate that 126 properties (31%) were represented by attendance at the workshops. RDL 2.1 Attachment B is a copy of the questionnaire that all workshop attendees were invited to complete and return. RDL 2.1 Attachment C is a summary of the results from these questionnaires with the personal contact information withheld for confidentiality purposes as indicated on the questionnaires.

While it would be convenient to assign commentary to "did consider" or "did not consider", no such categorization can be made. In general, Ameren acted on public comment that resulted in a line routing that was more economical, more likely to receive favorable public reaction and/or mitigated a concern that Ameren was previously unaware of.

For example, the primary route for the LaSalle to Wedron line was changed from paralleling 33<sup>rd</sup> Road to the I-80 corridor because public opinion favored following the existing transportation corridor and also to alleviate public concerns about locating transmission lines near elementary schools. Ameren's deference to the public and the stated concerns about the line's location with respect to the schools should not be construed as agreeing to the allegations of claimed health hazards. Indeed, it remains Ameren's contention that such claims are a matter of perception only and not grounded in science.

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** (314) 206-0503  
**Date:** January 23, 2007





**Ameren Transmission Line Comment Sheet  
LaSalle – Fox River (Wedron) 138,000-Volt Line (March 29-30, 2006)**

Thank you for joining us today. After you have reviewed the information presented at today's workshop, please take a few minutes to complete this comment sheet and deposit it in the comment box adjacent to the refreshment area.

1. Do you feel the need for this project has been adequately explained?

Yes    No    Uncertain

If no, what additional information do you need?

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2. Do you have any concerns about the routes presented?

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3. Would you like an Ameren representative to contact you?

Yes    No

4. Do you have any additional comments?

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Please complete the following. Information will be kept confidential.

Name \_\_\_\_\_

Address \_\_\_\_\_

Best time of the day to reach me \_\_\_\_\_

Please call me at this number \_\_\_\_\_

	Q1	Q1 Comments	Q2 Comments	Q3	Q3 Comment	Q4 Comments
1	y		It would seem that the 2nd alternate next to Route 80 would be more efficient for future load grow	n		
2	y	We don't want you in our area. You wouldn't want in your yard	Yes. Go Rt 80 - devaluating homes farms & property - farm ground, school, health, etc	n		go rt 80 - we don't want it
3	y		This question was answered for me	n		
4	y		I would rather have the route follow an fence row in the middle of the section rather than have it follow the road.			
5	u	crop and land reimbursement when constructed but what about 10-20 years from now. What about yearly leasing of property right of way?	future development of land, homes, land values			would it be easier to push for Alt#1 and use existing right of way and not have to pay as much in claims to property owners. Less headaches maybe
6	u		Don't think these routes are the best	y		need to talk more about money as far long term
7	y		I see on one of the alternate routes it goes through fields north from LaSalle, Why couldn't we have more of that work, to stay away from people. Keep people happy			I like the route along Interstate 80. You would make more people happy. That route goes past 3 schools - 600 hundred children out plus staff. Stay away from the school route.
8	n	Health concerns, radiation from power lines, there is a effect on equipment & homes	to close to house & school - property value prop when next to pipeline or not saleable homes - go across fields not road ways	n		not my farm
9	y		yes, the primary route and alternate #2 are shown bisecting a 100' wide right of way we are in the process of reclaiming for industrial development. We have already reclaimed approx 10 acres of the tract	y		Alternative #1 would be a much more acceptable alternative. The primary and alternate #2 both require a huge amount of tree removal as well as excavation and site work.
10	y		As long as it stays on the north side of County Hwy 33	n		none
11	n	cost of the route is not the most important factor	yes! Move away from the homes & schools regardless of the costs!	y		change the route!
12	y		No	n		
13	y		not at this time	n		none
14	u		yes, alternate route 2 would seem to be safer for the residences	n		Primary route is too close to schools
15	u		I don' think a highly populated route w/high traveled road is not smart	n		feel 2nd route seems more feasible
16	y		Our concern is the pipeline that runs near the primary route will shift the poles out further into the field. The pipeline runs near the road from Route 23 west along 33rd road for 1 1/2 miles	y		we are really not happy with any of the routes because they will effect us on all 3 routes. It would also be interesting to hear from farmers who have these poles thru there property and if they are happy with eh way things have turned out. I wonder if it effected there property values
17	u		Yes, proximity to 3 elementary schools and the potential of being in the wrong place if Ottawa develops and needs to build infrastructure	y		please follow up on the extension of 33rd Road to the east connecting 18th Rd and 19th Road. Also the development of the ***** property east of Rt 23

	Q1	Q1 Comments	Q2 Comments	Q3	Q3 Comment	Q4 Comments
18	y u	How compensation for land devaluation will be handled	Environment effect on crop, livestock and children ( 3 schools on route)			
19	y		not right now	n		
20	u	on 33rd road you already have poles on the north side. Replace with bigger poles run all wires on them	yes we already have a pipeline on 33rd road	n		what happens if a farm tool hits the pole? Do you fix the machinery?
21	u		very concerned with the route. I don't want any power poles on my property. There is a set of poles on the north side of road. Why have another?	n		property values down. Future use of my property. Traffic hazard, farm equipment & automobile health concerns noise
22	y		yes	y		
23			north side of section 24 Dayton Township - 36" natural gas pipeline - very close to green line			
24	y		they were answered	n		It would be appreciated if the people on each of these routes would be notified as to what route was chosen
25	y		none	n		
26	y		why 33rd road with the most homes & 3 schools located on this road			stay on Rt 80 - not to many homes on this route.
27	y	there must be a better route	yes			I do not want to sell or give up any of my farms
28	y		will the poles & lines hold up when Illinois Cement gets to the area around them? They DO DYNAMITE REGULARLY. Alternate route would affect my 2 locations. I have cattle on one & understand they can be effected.			
29	y		Passing by 3 school, subdivisions, animals on most farms on primary route. Devalues property. Route 80 doesn't have all the adverse concerns.			
30	y	personal health next to lines, crop damage when maintenance done		n		
31	y		how much of my property will be taken up	y		I would just like to know when a final decision on which route is made
32	y		yes - I think a better and less intrusive route between LaSalle & Ottawa would be along the railroad by the canal. Two utilities have already successfully secured this ROW for their lines. Ottawa could then be looped to Wedron and then Marseilles which would provide for an even better backup freed taking both Hennepin and the other main feed from the south into the loop.	n		I think the loop is important but could be placed in a less intrusive area which would also increase the stability and backup
33	y		yes, health issues. 3 schools on primary route. Plus individual homes & property values down. Use the Rt 80 route.			
34	y		as long as the poles are on the north side of 33rd Road I have no concerns. I would like to be contacted if the route changes	n		

	Q1	Q1 Comments	Q2 Comments	Q3	Q3 Comment	Q4 Comments
35	y		Yes I do. Your preferred route goes right down the middle of my farm 1/2 mile. I guess you want me to farm around your poles for the rest of my life.	y		Please do use your alternative routes
36	y		n/a	n		no
37	y		yes, alternate Route #2 is the only acceptable route, 9 miles of the route is along Rt 80 Most of which has a frontage road already. 33rd Road may need to be 4 lane someday	n		please contact me with the date of the Springfield hearing
38	y		Gas lines, field drainage tiles, lines so near the house, traffic on N 33rd	n		
39	y		no	n		n
40	u	Are you buying ROW or using County ROW for the Line?	Yes - Why run this by 3 schools? Couldn't I-80 ROW be utilized saving you money? It would avoid the schools & many more homes			Will we hear a hum? What are the safety factors involved having 138,000 volts 200' from my home? I don't even use your power. It won't be on my land but I would have to look at it & tolerate the unknowns.
41	y		no	no		no
42	y			n		
43	y		Adequate compensation for easements should the alternate route be chosen	n		n
44	u		Well I'd rather it wasn't there	y		yes if you're gonna throw away the aerial photos - could I have one or two #1 & 2
45	y		Primary route is wrong. 1st going by 3 schools 2nd - right on top of 3 main gas lines 3rd - the value of my land would drop dramatically	y		MAKE SURE THEY CONTACT ME. You need to follow a main hiway, like the warden Blacktop - your substation is in Wedron
46	y		yes I would prefer alternate route along Rt 80	y		worried about TV reception, aerial spraying of crops. Long term danger of children's health of high voltage lines, fear of strong winds knocking pole over on house or school across the road.
47	y		yes use alternate route one along Rt 80	y		Worried about aerial applications along the power lines. Concerned about school children especially case of high winds or tornados
48	y		no	n		very well presented!
49	n	why the need?	yes	y		
50	y		power lines in immediate proximity to three? Schools. Is it really worth the accommodation to you?	y		why avoid the front yard of two schools and no the 3rd?
51	y		location of high pressure gas lines & proximity to transmission line	n		We appreciate the sensitivity to design & the effect on the environment. We will welcome continued information on the progress of the project.
52	y		Yes. 1. As school superintendent I am very concerned that this route goes by 3 schools 2. Is there a possibility that the EMF will interfere with our T! line (phone/computer SBC) 3. our satellite signals?	y		What happens if there are problems i.e. satellite or T! etc. after the lines go in? Who will rectify the issues and/or care they be rectified? Our voice would like to be heard - Route 80 would seem to be a better choice for lines as supposed to schools & homes
53	y	If everything is true & you can back it up - if we were to have a problem it would be your word against ours.	Rt 80 where there is nothing in the way would be ideal - we're going from LaSalle to Ottawa - point A to point B. not difficult to understand			our satellite dishes - mobile phones - anything that may require satellite - GPS - on our equipment both now & in the future

	Q1	Q1 Comments	Q2 Comments	Q3	Q3 Comment	Q4 Comments
54	y		I don't like the primary route going past the schools and also going past my family farm - depreciating our land	n		I would like to see one of the alternate routes used, not going past the schools
55	y		Why over so many homes - go to less populated area to run you power			Will the magnetic field affect DirecTV satellite service? If it does, who pays to fix the problem (if any) & is there a grace period to find any problems throughout the year. Does the field of energy created affect tree growth or human health
56	n	less populated routes need to be considered, no matter what the cost of the obstacles	Yes! Only route by Route 80 should be considered, areas are too populated should go along empty fields or along Interstate to avoid lawsuits !!!	y		Use only route 80 should be considered and altered if necessary, first& second choices should not be considered going down 33rd Road. Who is going to be responsible for health risk of the people & children living under
57	y		primary route is located on north side of my residential subdivision - I am concerned for my 13 lots and the 7 lots that have been purchased	y		I would be very opposed to the power liens switching to the south side of the road at my subdivision
58	y		no	n		
59	y			n		your letter and maps list ***** as the property owner. She died last year. Property now owned by ***** and *****. ***** primary contact
60	y		yes I don't want to see more poles in front of my house. How much will it affect my property value? It will	y	if it has to do with new information not covered here tonight.	I'd like to see it follow the interstate. If growth expands along Rt 80, how many smaller substations will we have feeding this growth off of 33rd Road How much more land will be affected in our area due to others new growth.
61	y		no	n	not until my route becomes the favored route	
62	n	why aren't buying the lines an option?	y			
63	y	it has been explained but I still have many concerns	yes I have 2 small children that will be playing outside under these power lines. Please place the line on the opposite side of the road	y		the alternate routes (either one) would be better than the one they are proposing. Too many risks are involve regarding children. Why would you put a line like this on a road with 3 schools?
64	y		real estate values	n		
65	y	I see that you believe in this project considering the population changes around this area	Yes, I do. We have a rental house in the SW corner of Section 14 Waltham Township LaSalle County, Il. The house is <u>less</u> than 100' from the center of the road			*****, our son, lines there (*****). I believe it is unacceptable to live so close to something which affect human health.
66	y	Route 1 would cause problems for a future airstrip next to my house	would vote for alternative #2 as the best route in keeping everything close to Rt. 80			if pole line on 33rd road it should be on the south side at road 3 intersection to keep away from cows - the farthest away from houses the better. Stagger the power line back & forth across the road. Keep N 33rd Road power line on the south side
67	y		I am concerned that the house my family lives in is closer than 100 feet. This is not acceptable			There is no guarantee that the magnetic field that this much voltage produces is not a health danger.
68	y		yes follow Route 80!	n		follow I-80!
69	y		yes, health concerns and lack of compensation & control over devaluation of our property which is on the opposite side of the road where the poles will sit.			

**LITTLE VERMILLION RIVER WATERSHED  
PLANNING COMMITTEE**

*"A PROJECT OF THE LASALLE COUNTY SOIL & WATER CONSERVATION DISTRICT"*

1691 N 31<sup>ST</sup> ROAD, OTTAWA, IL 61350

PHONE: 815-433-0551, EXT. 3

FAX: 815-433-0665

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June 20, 2006

Leigh E. Morris  
Ameren Corporation  
607 East Adams Street  
Springfield, IL 62739-0001

Dear Mr. Morris,

At our meeting on Monday June 19<sup>th</sup>, various members brought up concerns about the new Ameren primary North La Salle – Fox River Transmission Line proposal. Our group has environmental concerns about the effects of construction in the Little Vermilion River Valley and Watershed.

Our mission statement and goals demand that we be proactive in preserving our Watershed. We would like to work with you as this line will cross the Little Vermilion River.

To this end, we are inviting your plan designers to address our group and present your strategy for this new line.

Looking forward to hearing from you soon. Enclosed is a copy of our mission statement and plan.

Best regards,



Tim Postula  
Secretary

June 22, 2006

There have been many changes in the City of La Salle in the last 15 years. While some have been for the better, many have not. It is time to take a stand, look toward growth and quality of life and insist that Ameren follow the Industrial Park to I-80. There is no other way to protect the health, safety and property values of the citizens.

- 1) All previous plans went north thru Civic Industrial Park
- 2) No new cuts thru the Little Vermilion River Valley- follow I-80
- 3) No additional degrading, slumping or disturbance of Carus or Illinois Cement property-- Including the Superfund site.
- 4) Schools up north (ie. Dimmick, Waltham, Wallace) were spared but now we will damage La Salle's schools thru health issues and loss of TIF monies and property values.
- 5) This is only the beginning, the number of lines and voltage will double or triple in the next few years.
- 6) La Salle's east side residents have already suffered thru the Electrical Utilities Superfund cleanup, how can you put them in harm's way again and further devalue their homes?
- 7) Future developers will not trust the City to protect their investments and will go elsewhere.
- 8) SEVERAL 100 HOMES ARE ALONG THIS ROUTE  
Proceeding north thru Civic Industrial Park has many positives.

- 1) It will not effect any homes
- 2) It will not effect any schools
- 3) It will protect the TIF and residential development to the east.
- 4) It will protect the Little Vermilion River Valley
- 5) It will give Ameren easy access to the lines for installation and maintenance
- 6) It will significantly shorten the route
- 7) It will be positive PR for Ameren-showing their concern for our community

This is not an overall rejection of the route, but it requires a modification of the first 3 miles.

Nancy Jasiak  
462 N. 2929th Road      La Salle, Il 61301

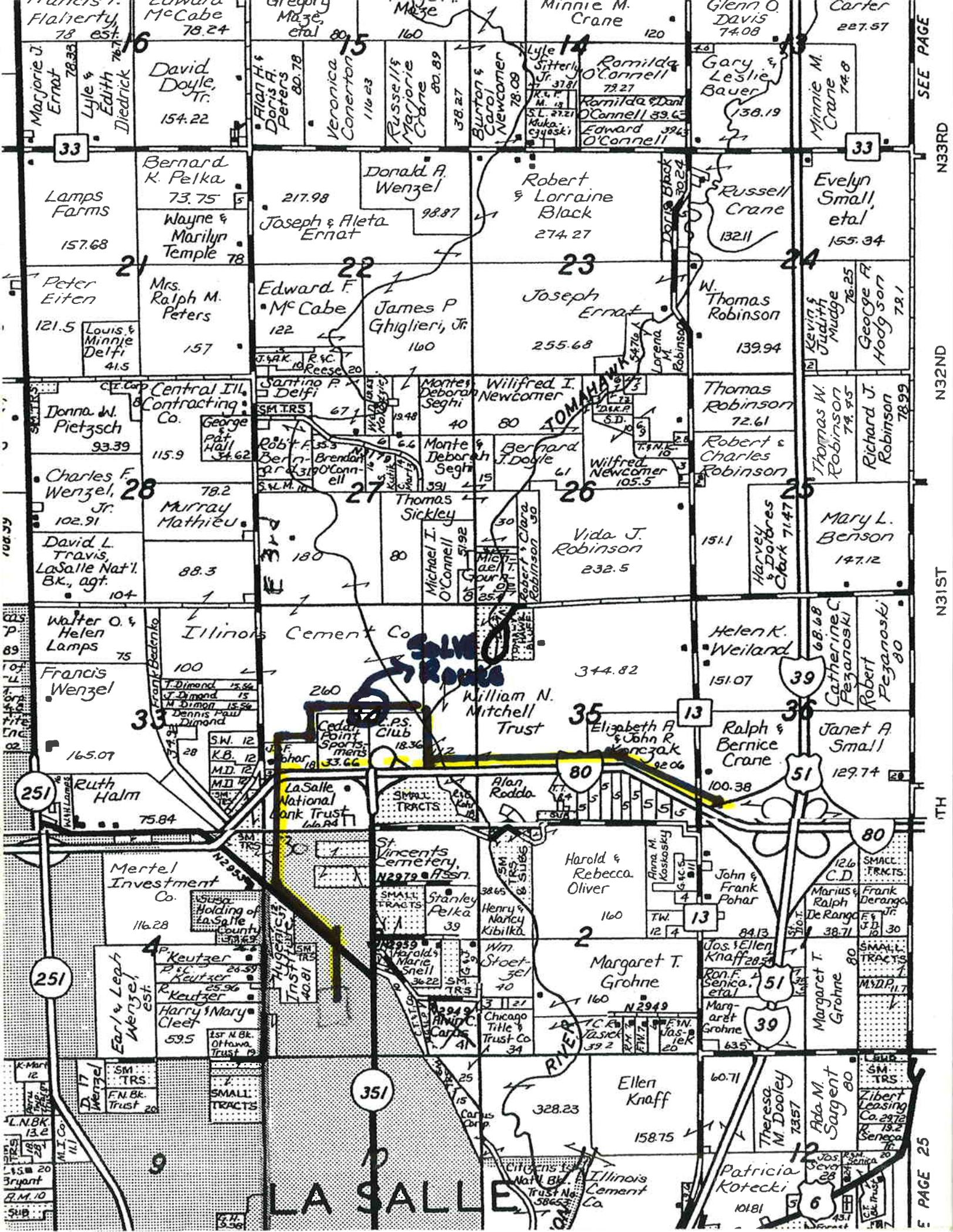
## PROPOSED ROUTE FOR AMEREN I P POWER LINE FOR THE LA SALLE AREA

Proceed north from La Salle Substation across Raccuglia. Then north-west along the north side of Raccuglia to a point approximately 250' east of East 3<sup>rd</sup> Road. Then north along the west property line of Air Products and continue north across 30<sup>th</sup> road. Then north along the west property line of Northern Illinois Mack and continue north across U.S. Interstate Route 80.

At this point the Ameren engineers should determine the most feasible route eastward, whether it is along the north right of way line of Interstate 80 or if the line should go further north around the south property line of Illinois Cement Company before returning to Interstate Route 80 and then continuing east along the north right of way line of Interstate Route 80.

Important advantages of this route are as follows;

1. Schools- none affected
2. Homes- none affected
3. Environmental- Minimum impact on Little Vermilion River Valley by crossing adjacent to the north Interstate 80 bridge.
4. Economic-
  - a. Raccuglia already has 3 phase power lines on both sides so property values along Raccuglia should not be affected.
  - b. Crossing north thru the industrial park takes the power line along side lot lines and back lot lines of the industrial owners. No buildings need to be removed.



SEE PAGE

N33RD

N32ND

N31ST

TH

E PAGE 25

Flaherty 78 est. 16  
Marjorie J. Ernat 76.33  
Lyle & Edith Diedrick 76.71  
David Doyle, Tr. 154.22

Gregory Maze, etal 80.15  
Veronica Conerton 116.23  
Russell & Marjorie Crane 80.89  
Burton & Carol Newcomer 78.08

Minnie M. Crane 120  
Lyle 14  
Sitterly Jr. 37.81  
Romilda O'Connell 78.27  
Romilda & Dan O'Connell 59.53  
Edward O'Connell 39.23

Glenn O. Davis 74.08  
Gary & Leslie Bauer 138.19  
Minnie M. Crane 74.0

Lamps Farms 157.68  
Peter Eiten 121.5  
Louis & Minnie Delfi 41.5

Bernard K. Pelka 73.75  
Wayne & Marilyn Temple 78

Donald A. Wenzel 217.98  
Joseph & Aleta Ernat 98.87  
Edward F. McCabe 122  
James P. Ghiglieri, Jr. 160

Robert & Lorraine Black 274.27  
Joseph Ernat 255.68  
W. Thomas Robinson 139.94

Russell Crane 132.11  
Evelyn Small, etal 155.34  
Kevin & Judith Mudge 76.25  
George F. Hodgson 79.1

Mrs. Ralph M. Peters 157

Edward F. McCabe 122

James P. Ghiglieri, Jr. 160

Joseph Ernat 255.68

W. Thomas Robinson 139.94

Donna W. Pietzsch 93.39

Central Ill. Contracting Co. 115.9  
George post Hall 34.62

Santino P. Delfi 67.1  
Monte Deborah Seghi 40  
Monte & Deborah Seghi 39.1

Wilfred I. Newcomer 80  
Bernard J. Doyle 61  
Wilfred Newcomer 105.5

Thomas Robinson 72.61  
Robert & Charles Robinson  
Thomas W. Robinson 79.95  
Richard J. Robinson 78.99

Charles F. Wenzel, Jr. 102.91  
David L. Travis, LaSalle Nat'l. Bk., agt. 104

Murray Mathieu 88.3

Thomas Sickley 80  
Michael I. O'Connell 51.92

Vida J. Robinson 232.5

Mary L. Benson 147.12

Walter O. & Helen Lamps 75  
Francis Wenzel 165.07  
Ruth Halm 75.84

Illinois Cement Co. 100

William N. Mitchell Trust 344.82

Elizabeth A. & John R. Kanczak 92.06

Helen K. Weiland 151.07  
Ralph & Bernice Crane 100.38  
Janet A. Small 129.74

Earl & Leah Wenzel, est. 59.5  
Harry & Mary Cleet 59.5

Mertel Investment Co. 116.28  
K. Keutzer 26.59  
R. Keutzer 25.96  
Harry & Mary Cleet 59.5

LaSalle National Bank Trust 16.84  
St. Vincent's Cemetery, N2979 Assn. 38.65  
Stanley Felka 39  
Henry & Nancy Kibilka 39

Harold & Rebecca Oliver 160  
Margaret T. Grohne 160

John & Frank Pohar 84.13  
Marius & Ralph DeRango 38.71  
Margaret T. Grohne 80

L.N.B.K. 13.2  
Bryant 15.20  
R.M. 10

SM. TRS.  
F.N.B.K. Trust 20  
SMALL TRACTS

LA SALLE

Ellen Knaff 158.75

Theresa M. Dooley 73.57  
Ada M. Sargent 80  
Patricia Kotecki 101.81  
Zibert Leasing Co. 29.78

AmerenIP's and Ameren Illinois Transmission Company's  
Response to  
Illinois Commerce Commission Data Requests  
ICC Docket No. 06-0706  
Petition for Certificate of Public Convenience and Necessity

- RDL 3.1:** Did Ameren investigate burying any portion of either proposed 138kV transmission line?
- a) If yes, what portion(s) were investigated and why was the alternative(s) not selected.
  - b) If no, explain why Ameren did not consider burying any portion of the transmission lines.

- Response:**
- a) No portions of either line were investigated to be placed underground.
  - b) Although the technology for this type of construction certainly exists for 138kV, underground transmission lines cost 6 to 10 times as much as the overhead equivalent. In addition, Ameren does not have the equipment or personnel trained in maintaining or repairing underground transmission. Also, it is not uncommon for repairs to such lines to be made at the manufacturer's facilities. This requires removing the failed section and sending it off-site for an extended period of time. This would result in the line having an extended outage. The combination of these cost, maintenance, and reliability issues led Ameren to not consider underground lines as a practical alternative.

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** (314) 206-0503  
**Date:** February 20, 2007

AmerenIP's and Ameren Illinois Transmission Company's  
Response to  
Illinois Commerce Commission Data Requests  
ICC Docket No. 06-0706  
Petition for Certificate of Public Convenience and Necessity

**RDL 3.4:** Are the total cost estimates listed on Exhibits 3.3 and 4.3 item 2 considered planning or budgetary cost estimates? Explain what Ameren considers the difference in accuracy between planning class estimates, budget estimates and job order (work order) estimates.

**Response:** The total cost estimates listed in AmerenIP Exhibits 3.3 and 4.3 item 2 would be considered to be budgetary cost estimates. The costs shown in these exhibits reflect what is included in the approved Ameren budget for these line and substation projects.

Ameren typically uses the following degrees of accuracy and contingency allowances for the various levels of estimates:

Estimate Type	Accuracy Range	Contingency Allowance
Planning	± 40%	30%
Budgetary	± 30%	20%
Work Order (90% design)	± 10%	10%

These accuracy ranges and contingency allowances agree very well with the published estimating guide from the Department of Energy (DOE). RDL 3.4 Attachment A is a copy of Table 4-1 "Degrees of Accuracy" from the DOE *Cost Estimating, Analysis, and Standardization Guide (DOE G 430.1-1)*. RDL 3.4 Attachment B is a copy of Table 11-1 "Contingency Allowance Guide By Type of Estimate" from the same DOE guide. The Ameren work order estimate level corresponds to the DOE Title II Design level which assumes design is 60-100% complete. The planning and budgetary levels are designated the same by Ameren and the DOE.

**Supplemental Response:** Ameren inadvertently failed to file Attachments A & B with its original response on February 20, 2007. Attached are Attachments A & B.

**Prepared By:** Douglas Emmons  
**Title:** Career Engineer  
**Phone:** (314) 206-0503  
**Date:** March 8, 2007

<b>TABLE 4-1</b>		
<b>DEGREES OF ACCURACY</b>		
<b>TYPE</b>	<b>PURPOSES</b>	<b>ACCURACY RANGE</b>
<b>Conventional Construction</b>		
Planning/Feasibility or Order of Magnitude Estimate  (Proposal)	<ol style="list-style-type: none"> <li>1. Scoping Studies.</li> <li>2. Preliminary budget estimates of Total Project Cost.</li> <li>3. Support Key Decision 0.</li> </ol>	± 40%
Budget/Conceptual Design Estimate  (Equipment Factored)	<ol style="list-style-type: none"> <li>1. Ensure project feasibility.</li> <li>2. Develop reliable project cost estimate.</li> <li>3. Establish baseline project definitions, schedules, and costs.</li> <li>4. Support Key Decision 1.</li> </ol> <p style="text-align: center;">(Design 10% to 15% Complete)</p>	± 30%
Title I Estimate	<ol style="list-style-type: none"> <li>1. Verify that Title I design details still remain within the project funding.</li> <li>2. Support Key Decision 2.</li> </ol> <p style="text-align: center;">(Design 25% to 35% complete)</p>	± 20%
Title II or Definitive Estimate  (Detailed)	<ol style="list-style-type: none"> <li>1. Estimate construction costs as accurately as possible, prior to the commencement of competitive bidding and construction activities.</li> <li>2. Support Key Decision 3.</li> </ol> <p style="text-align: center;">(Design 60% to 100% Complete)</p>	- 5% to + 15%
Construction Estimate	<ol style="list-style-type: none"> <li>1. Estimate is based on bid information.</li> </ol> <p style="text-align: center;">(Design 100% complete)</p>	- 5% to + 10%

Estimate types “a” through “e” in Table 11-1 are primarily an indication of the degree of completeness of the design. Type “f,” current working estimates, found in Table 11-2, depends upon the completeness of design, procurement, and construction. Contingency is calculated on the basis of remaining costs not incurred. Type “g,” the Independent Estimate, may occur at any time, and the corresponding contingency would be used (i.e., “a,” “b,” etc.).

<b>Table 11-1. Contingency Allowance Guide By Type of Estimate</b>	
<b>Type of Estimate</b>	<b>Overall Contingency Allowances % of Remaining Costs Not Incurred</b>
PLANNING (Prior to CDR) Standard Experimental/Special Conditions	20% to 30% Up to 50%
BUDGET (Based upon CDR) Standard Experimental/Special Conditions	15% to 25% Up to 40%
TITLE I	10% to 20%
TITLE II DESIGN	5% to 15%
GOVERNMENT (BID CHECK)	5% to 15% adjusted to suit market conditions
CURRENT WORKING ESTIMATES	See Table 11-2
INDEPENDENT ESTIMATE	To suit status of project and estimator's judgment

The following factors need to be considered to select the contingency for specific items in the estimate while staying within the guideline ranges for each type of estimate.

**1. Project Complexity**

Unforeseen, uncertain, and unpredictable conditions will exist. Therefore, using the DOE cost code of accounts for construction, the following percents are provided for planning and budget estimates. They are listed in order of increasing complexity:

- Land and Land Rights 5% to 10%
- Improvements to Land/Standard Equipment 10% to 15%