

**ORIGINAL**

ILLINOIS  
COMMERCIAL COMMISSION

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**ILLINOIS COMMERCE COMMISSION**

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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

**OBJECTION**

Now comes the City of LaSalle, a body politic and corporate, by and through its attorneys, Anthony C. Raccuglia & Associates, P.C., at the request of the Mayor of the City of LaSalle, and respectfully objects for the record to the suggested "Y" (yellow) alternative route for that which has been sometimes commonly referred to as the western portion of IP and AITC's route between LaSalle and Wedron; and in further support thereof, submit the following:

1. That the City of LaSalle was not itself provided any formal notice of the proposed October 18, 2007 status hearing; or the continued status hearing of October 29, 2007.
2. That the City of LaSalle was not aware that the route commonly referred to as the "Y" (yellow) alternative route was being considered by the Illinois Commerce Commission until Wednesday, October 24, 2007.
3. That the City of LaSalle had been aware a long time ago that the "Y" (yellow) alternative route was initially discussed, but the City of LaSalle was of the understanding that said route had long since been rejected and abandoned; and, again, the City was not aware that it might be considered by the Illinois Commerce Commission.
4. That additionally the proposed "Y" (yellow) alternative route traverses City right-of-

way; and thus it is respectfully suggested that, procedurally, from a due process standpoint, the City as a party having an interest in land not only from the land being part of the City, but also having a portion of the same be City right-of-way, should have been entitled to specific notice of consideration of the "Y" (yellow) alternative route as a landowner, and should not have had to learn of the scheduled status hearing regarding consideration of the "Y" (yellow) alternative route from third parties.

5. That the City of LaSalle has always been opposed to the "Y" (yellow) route for many reasons, including but not being limited to the following:

A. That the "Y" (yellow) route would impact two City of LaSalle residential subdivisions already partially developed, and in process of being developed; and through an additional residential subdivision in the planning stage, amongst other detriments to the "Y" (yellow) route.

B. That the "Y" (yellow) route would cause a greater disturbance, it is respectfully submitted, in reference to environmental concerns, including but not being limited to wildlife concerns, wetland concerns, affecting endangered species, and also involving significant costs, among other reasons.

6. That additionally a copy of communication from the City of LaSalle to AmerenIP as far back as June 12, 2006, indicating our opposition to the "Y" (yellow) route is attached hereto and made a part hereof as Exhibit "A".

Wherefore, for the aforesaid reasons, and for such others as may be enunciated at the time of any hearing on the matter, the City of LaSalle respectfully objects to placing the suggested transmission lines on the alternative "Y" (yellow) alternative route;

And also objects to any further consideration of that route, without a full hearing and explanation as to the legitimate reasons as to why the "Y" (yellow) route was originally rejected and no longer pursued by Illinois Power Company;

And also respectfully prays for such other and further relief as the Illinois Commerce Commission may deem just and appropriate in the circumstances.



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Art Washkowiak  
Mayor of the City of LaSalle



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James A. McPhedran  
Anthony C. Raccuglia & Associates, P.C.  
Corporate Counsel for the City of LaSalle

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Illinois Power Company )  
d/b/a/ AmerenIP )  
and Ameren Illinois Transmission Company ) 06-0706  
Petition for a Certificate of Public Convenience )  
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lines in LaSalle County, Illinois )

**PROOF OF SERVICE**

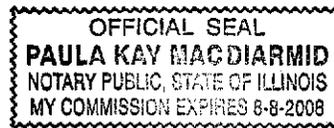
The undersigned certifies that she served a copy of the attached Petition for Leave to Intervene and Objection by mailing a copy of same and depositing same in the U.S. Mail at the U.S. Post Office in Peru, Illinois at 4:00 p.m. on October 29<sup>th</sup>, 2007, to the following:

PLEASE SEE ATTACHED SERVICE LIST.

Susan Heffele-Saethe

Subscribed and Sworn to before me this  
29<sup>th</sup> day of October, 2007.

Paula Kay MacDiarmid  
Notary Public



ANTHONY C. RACCULGIA & ASSOCIATES, P.C  
Attorneys-At-Law  
1200 Maple Drive  
Peru, Illinois 61354  
Telephone: 815-223-0230  
Facsimile: 815-223-0233

# Illinois Commerce Commission

Rod R. Blagojevich, Governor

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## Service List

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Service List for Case 06-0706  
Created on 10/26/2007

---

Albert D. Sturtevant, Atty. for Applicants  
Jones Day  
77 W. Wacker  
Chicago, IL 60601

Petitioner and Party of Record  
Added to Service List on 11/02/2006

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Christopher W. Flynn, Atty. for Applicants  
Jones Day  
77 W. Wacker, Ste. 3500  
Chicago, IL 60601-1692

Petitioner and Party of Record  
Added to Service List on 11/01/2006

---

Edward C. Fitzhenry  
Ameren Services Company  
PO Box 66149 (M/C 1310)  
1901 Chouteau Ave.  
St. Louis, MO 63166-6149

Petitioner and Party of Record  
Added to Service List on 11/01/2006

---

Erika Dominick, Paralegal  
Legal Dept.  
Ameren Services Company  
(m/c 1310)  
1901 Chouteau Ave.  
St. Louis, MO 63103

Miscellaneous  
Added to Service List on 11/03/2006

---

Janis Von Qualen  
Office of General Counsel  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Miscellaneous and Party of Record

ICC

Illinois

Illinois Commerce Comm.  
527 East Capitol Ave  
Springfield, IL 62701  
(217) 782-7295

Added to Service List on 11/09/2006

---

James V. Olivero  
Office of General Counsel  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Miscellaneous and Party of Record  
Added to Service List on 11/09/2006

---

Jackie K. Voiles  
607 E. Adams St.  
Springfield, IL 62739

Petitioner and Party of Record  
Added to Service List on 11/13/2006

---

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

Petitioner and Party of Record  
Added to Service List on 11/13/2006

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William M. Shay, Atty. for SHOCK  
Howard & Howard Attorneys P.C.  
One Technology Plaza  
211 Fulton St., Ste. 600  
Peoria, IL 61602

Intervenor  
Added to Service List on 11/16/2006  
Removed from Service List on 07/11/2007

---

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

Intervenor  
Added to Service List on 11/16/2006  
Removed from Service List on 07/13/2007

---

Frederick J. Blue  
3168 E. 9th Rd.  
Utica, IL 61373

Intervenor and Party of Record  
Added to Service List on 11/16/2006

---

Ron Linkenback, Case Manager  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Miscellaneous and Party of Record  
Added to Service List on 11/17/2006

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

Intervenor and Party of Record  
Added to Service List on 11/28/2006

---

Eric M. Madiar, Atty. for Illinois 71 Resistors  
Freeborn & Peters LLP  
217 E. Monroe St., Ste. 202  
Springfield, IL 62701

Intervenor and Party of Record  
Added to Service List on 12/29/2006

---

Michael J. Scotti III, Atty. for Illinois 71 Resistors  
Freeborn & Peters LLP  
217 E. Monroe St., Ste. 202  
Springfield, IL 62701

Intervenor and Party of Record  
Added to Service List on 12/29/2006

---

John L. Cantlin, Atty. for Robert B. and Linda J. Dolder  
John L. Cantlin and Associates  
760 E. Etna Rd.  
Ottawa, IL 61350

Intervenor and Party of Record  
Added to Service List on 01/10/2007

---

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

Intervenor and Party of Record  
Added to Service List on 01/23/2007

---

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

Intervenor and Party of Record  
Added to Service List on 01/23/2007

---

Patricia Leary, For Estate of Margaret M. Kennedy and  
Margaret M. Kennedy Declaration of Trust  
301 W. Union Ave.  
Wheaton, IL 60187

Intervenor and Party of Record

Added to Service List on 02/08/2007

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Brien J. Nagle, Successor Trustee of LeRoy J. Nagle  
Declaration of Trust  
Nagle & Higgins, P.C.  
222 S. Mill St., Ste. 200  
Naperville, IL 60540

Intervenor and Party of Record

Added to Service List on 02/09/2007

---

Herbert J. Klein, Atty. for Village of North Utica  
Law Office of Herbert J. Klein  
925 Shooting Park Rd., Ste. A  
Peru, IL 61354

Intervenor and Party of Record

Added to Service List on 02/13/2007

---

Keith R. Leigh, Atty. for City of Ottawa  
Pool Leigh & Kopko, P.C.  
628 Columbus St., Ste. 208  
Ottawa, IL 61350

Intervenor and Party of Record

Added to Service List on 04/05/2007

---

Anita L. Kopko, Atty. for City of Ottawa  
Pool Leigh & Kopko, P.C.  
628 Columbus St., Ste. 208  
Ottawa, IL 61350

Intervenor and Party of Record

Added to Service List on 04/05/2007

---

Matthew R. Tomc  
Ameren Services Company  
PO Box 66149, MC 1310  
1901 Chouteau Ave.  
St. Louis, MO 63166

Intervenor and Party of Record

Added to Service List on 05/11/2007

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Irene Schindel  
5 Notre Dame Dr.  
Naperville, IL 60540

Intervenor and Party of Record

Added to Service List on 06/15/2007

---

Walter J. Zukowski, Atty. for LaSalle-Peru Township High School Dist. # 120  
Zukowski Law Offices  
PO Box 484  
817 Peoria St.  
Peru, IL 61354

Intervenor and Party of Record

Added to Service List on 06/19/2007

---

William M. Shay, Atty. for SHOCK  
Attorney at Law  
456 Fulton St., Ste. 203  
Peoria, IL 61602-1220

Intervenor and Party of Record  
Added to Service List on 07/11/2007

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John D. Albers, Administrative Law Judge  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701

Miscellaneous and Party of Record  
Added to Service List on 10/19/2007

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Number of Entries: 28