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ILLINOIS COMMERCE COMMISSION STATE OF ILLINOIS

ORIGINAL

ILLINOIS COMMERCE COMMISSION

2011 APR -11 A 10:26

CHIEF CLERK'S OFFICE

ILLINOIS COMMERCE COMMISSION

SOUTHERN ILLINOIS POWER COOPERATIVE )  
an Illinois not-for-profit Corporation and an )  
electric cooperative. )

For Authority to exercise the right of )  
eminent domain pursuant to 220 ILCS 30/13 )  
and 30/13.5 of the Electric Supplier Act. )

Docket No. 10-0711

**RESPONSE TO PETITION**

Illinois Land of Lakes, LLC, by and through its attorney, Edward J. Heller of Reed, Heller & Mansfield, responds to Petition, saying:

1 - 5. Illinois Land of Lakes, LLC, Respondent, neither admits nor denies the allegations of paragraphs 1 through 5, inclusive, and states that it lacks sufficient knowledge thereof so as to form a belief as to the truth or falsity thereof and so therefore demands strict proof.

6. Illinois Land of Lakes, LLC, Respondent, admits that SIPC must obtain easements and/or right of ways from property owners. Respondent denies that the transmission line plan of construction shows that the transmission line will be constructed in a manner so as to minimize the impact on land usage and cultivated farm ground. Respondent neither admits nor denies the remaining allegations of paragraph 6 and states that it lacks sufficient knowledge thereof so as to from a belief as to the truth or falsity thereof and so therefore demands strict proof.

7 - 9. Illinois Land of Lakes, LLC, Respondent, neither admits nor denies the remaining allegations of paragraphs 7 through 9, inclusively, and states that it lacks sufficient knowledge thereof so as to from a belief as to the truth or falsity thereof and so therefore demands strict proof.

10. Illinois Land of Lakes, LLC, Respondent, denies the allegations of Paragraph 10.

11. Illinois Land of Lakes, LLC, Respondent, admits that SIPC commissioned appraisals but denies that the offer of compensation was reasonable.

12. Illinois Land of Lakes, LLC, Respondent, denies the allegations of Paragraph 12.

13. Illinois Land of Lakes, LLC, Respondent, denies the allegations of Paragraph 13.

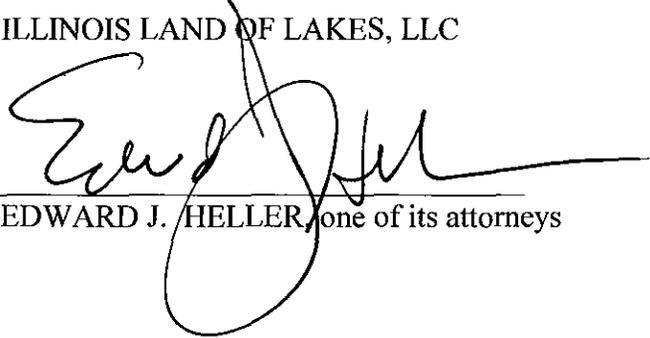
14 - 17. Illinois Land of Lakes, LLC, Respondent, neither admits nor denies the remaining allegations of paragraphs 14 through 17, inclusively, and states that it lacks sufficient knowledge thereof so as to form a belief as to the truth or falsity thereof and so therefore demands strict proof.

18. Illinois Land of Lakes, LLC, Respondent, denies the allegations of paragraph 18.

WHEREFORE, Illinois Land of Lakes, LLC, Respondent, requests that Petition be denied.

ILLINOIS LAND OF LAKES, LLC

BY:

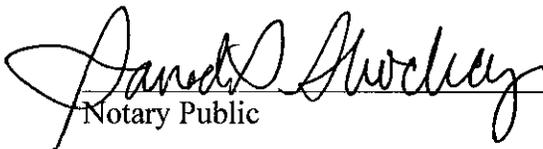
  
EDWARD J. HELLER, one of its attorneys

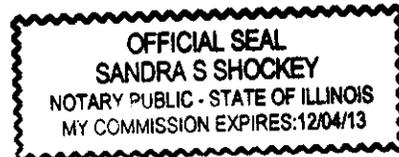
**CERTIFICATION**

CLAY FUHRHOP manager of LAND OF LAKES, LLC, under penalties as provided by law pursuant to Section 1-109 of the Code of Civil Procedure, being first duly sworn upon oath deposes and states that he has read the above and foregoing document by him subscribed and that the facts contained therein are true to the best of his knowledge and belief.

  
\_\_\_\_\_  
CLAY FUHRHOP

Subscribed and sworn to before me this  
30<sup>th</sup> day of March, 2011.

  
\_\_\_\_\_  
Notary Public



## PROOF OF SERVICE

The undersigned certifies that a copy of the forgoing was served upon the attorney of record to the above cause by enclosing a copy of same in an envelope addresses to said attorney at the following address:

Gary A. Brown, Atty. for Southern Illinois  
Power Cooperative  
Sorling, Northrup, Hanna, Cullen and  
Cochran, Ltd.  
Ste. 800, Illinois Building  
607 E. Adams St.  
Springfield, IL 62705  
[gabrown@sorlinglaw.com](mailto:gabrown@sorlinglaw.com)

Don E. Prosser, Atty. for Landowners  
Gilbert Huffman Prosser Hewson & Barke, Ltd.  
PO Box 1060  
102 S. Orchard Dr.  
Carbondale, IL 62901  
[attorneys@southernillinoislaw.com](mailto:attorneys@southernillinoislaw.com)

W. Scott Ramsey, President & General  
Manager

Southern Illinois Power Cooperative  
11543 Lake of Egypt Rd.  
Marion, IL 62959  
[sramsey@sipower.org](mailto:sramsey@sipower.org)

Lisa M. Tapia, Administrative Law Judge  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701  
[ltapia@icc.illinois.gov](mailto:ltapia@icc.illinois.gov)

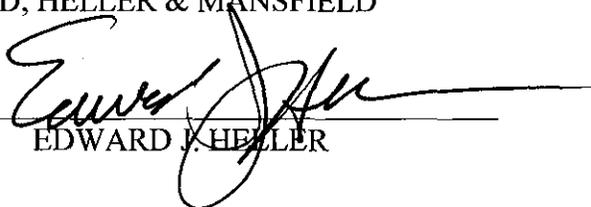
Jerry Tice, Atty. for Southern Illinois Power Cooperative  
Grosboll Becker Tice Tippey & Barr  
101 E. Douglas  
Petersburg, IL 62675  
[ticej@ticetippeybarr.com](mailto:ticej@ticetippeybarr.com)

Carmen Turner  
3888 Moake School Rd.  
Marion, IL 62959  
[carmen.turner@va.gov](mailto:carmen.turner@va.gov)

Janis Von Qualen  
Office of General Counsel  
Illinois Commerce Commission  
527 E. Capitol Ave.  
Springfield, IL 62701  
[jvonqual@icc.illinois.gov](mailto:jvonqual@icc.illinois.gov)

as disclosed by the pleadings, with postage fully prepaid thereon, and by depositing said envelope in a United States Post Office mail box in Murphysboro, Illinois, on the 30 day of March, 2011, at 5:00p.m.

REED, HELLER & MANSFIELD

BY: 

EDWARD J. HELLER

REED, HELLER & MANSFIELD, Attorneys at Law  
1100 Walnut St., P.O. Box 727  
Murphysboro, IL 62966  
Telephone: (618)687-2376, Facsimile: (618)684-5554  
[rhmg@rhmglaw.com](mailto:rhmg@rhmglaw.com)