

**BEFORE THE ILLINOIS COMMERCE COMMISSION
STATE OF ILLINOIS**

**AMEREN TRANSMISSION)
COMPANY OF ILLINOIS)**

**Petition for a Certificate of Public)
Convenience and Necessity, pursuant)
To Section 8-406.1 of the Illinois Public)
Utilities Act, and an Order pursuant to)
Section 8-503 of the Public Utilities Act,)
To Construct, Operate and Maintain a)
New High Voltage Electric Service Line)
And Related Facilities in the Counties)
of Adams, Brown, Cass, Champaign,)
Christian, Clark, Coles, Edgar, Fulton,)
Macon, Montgomery, Morgan, Moultrie)
Pike, Sangamon, Schuyler, Scott, and)
Shelby, Illinois)**

Docket No. 12-0598

**VERIFIED PETITION TO INTERVENE
OF THE NATURE CONSERVANCY**

The Nature Conservancy, by and through its counsel Quarles & Brady LLP, pursuant to 83 Illinois Administrative Code Section 200.200, hereby petitions the Illinois Commerce Commission (“Commission”) to intervene in the instant proceeding, and in support of this Petition, state as follows:

1. The Nature Conservancy is a non-profit conservation organization incorporated in the District of Columbia. Its principal mission is to protect ecologically important lands and waters for nature and people.
2. The Nature Conservancy works in all 50 states and more than 30 countries. It has five offices located in Illinois.
3. In the instant proceeding, Ameren Transmission Company of Illinois ("Ameren") seeks permission to route a 345 kV electric transmission line across the State of Illinois. The route that Ameren proposes would locate a portion of that transmission line across or directly adjacent to land known as the Spunky Bottoms Preserve ("Preserve") located in Brown County, Illinois. The Preserve contains land owned in fee by The Nature Conservancy as well as privately owned property subject to

a conservation easement held by The Nature Conservancy. The Preserve is an Illinois Natural Areas Inventory site located on a restored floodplain adjacent to the Illinois River. The Preserve is home to approximately twenty threatened or endangered species, and both the Preserve and the surrounding land has great ecological value that would be impaired by siting Ameren's transmission line on the route currently proposed. The Nature Conservancy also has concerns regarding certain portions of the alternative route that Ameren proposes to the extent that such a route could adversely impact wetland mitigation areas. As a result, The Nature Conservancy has a substantial interest in the instant proceeding.

4. The Nature Conservancy wishes to participate as an active party in the instant proceeding and to present its position on the issues. Granting of the instant Petition to Intervene will not delay this proceeding.

5. The Nature Conservancy agrees to accept service by electronic means as provided for in Section 200.1050 of the Commission's Rules of Practice. (83 Ill. Adm. Code 200.1050). Please include on the service list the following representatives of The Nature Conservancy:

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6. The Nature Conservancy agrees to accept the status of the record as it exists as of the date of the instant Petition and to be bound by rulings and orders in the instant proceeding as of the date of the instant Petition.

WHEREFORE, The Nature Conservancy respectfully requests that the Commission grant the instant Petition to Intervene, permit it to participate in this proceeding, and grant such further additional relief as it deems appropriate.

Respectfully submitted,

THE NATURE CONSERVANCY

By: /s/Christopher J. Townsend
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