

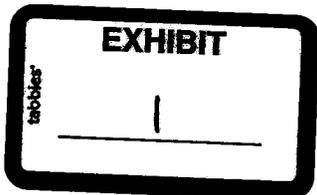
**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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

AFFIDAVIT OF PEGGY MILLS

1. My name is Peggy Mills. If called to testify in this proceeding, I could and would testify to the following facts based on my personal knowledge.
2. I am a founding member and one of the organizers of the Stop the Power Lines Coalition (“Coalition.”) The coalition is comprised of landowners in Clark County who will be adversely affected if the proposed 345 kV Transmission were constructed along the proposed primary route.
3. The Coalition began its search for counsel shortly after the Petition in this proceeding was filed on November 7, 2012. That took some time, and, while we have retained counsel, we are still in the process of raising the funds through contributions to pay for the legal fees associated with our representation.
4. Our counsel was on vacation when the Case Management Plan was issued via email in the afternoon of Friday, December 14. The Coalition did not receive notice of the Case



Motion to Amend Case Management Plan to Either Eliminate the
December 31, 2012 Filing Requirement or to Extend the time for the Same
ICC Dkt. No. 12-0598

Management plan contents until Monday, December 17, when advised by counsel who also forwarded a copy of the Plan.

5. It is not practical for the coalition to agree upon an alternative route for the proposed transmission and identify all affected landowners in the two weeks before the end of the year, which span Christmas and the intervening week prior to New Year's Day. The Coalition intends to make decisions by majority rule, and we are largely dependent on volunteer efforts and analysis. It is not practical or reasonable to expect us to complete the required analysis between December 17 and December 31, vote on the proposed route and identify the affected landowners. Put simply, our volunteers and members are focused in part on preparations, family events and potential travel during the holidays. Furthermore, for a group of this type, two weeks would not be enough time even if it did not include the Christmas holiday and week before the New Year.

6. Furthermore, the holidays are a problem in communicating with others. For example, one idea that the Coalition is exploring is possibly trying to route the transmission line within the right of way of Interstate 70. The Illinois Department of Transportation ("IDOT") owns that right of way, and has administrative rules governing the location of utilities in interstate right of way. It took our counsel two days to obtain a clarification from IDOT of its rules. The issues, as I understand, among others include the issue of whether there is sufficient right of way outside the access control area to accommodate and service the proposed transmission line. While I could be surprised, I suspect that with IDOT employees' vacation schedules there is absolutely no way we can obtain information from IDOT and do the requisite analysis by December 31. Furthermore, if we spend our time on that option and it proves to not be feasible, we will not have adequate time to explore other alternatives.

7. The Coalition simply cannot explore all potentially feasible alternatives and meet the December 31, deadline.

FURTHER AFFIANT SAYETH NOT.



Peggy Mills

Subscribed and Sworn to before me a Notary Public this 26 day of December, 2012.



Notary Public

