

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois)	
)	
Petition for a Certificate of Public Convenience)	No. 12-0598
and Necessity, pursuant to Section 8-406.1 of the)	
Illinois Public Utilities Act, and an Order pursuant)	
To Section 8-503of 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.)	

SUBMISSION OF ALTERNATE ROUTE

COMES NOW William M. Fiesler, individually and as the executor of the estate of Jennie E. Fiesler, Gas & Electric Service Co., Inc., Beverly C. McDonald, Be Mac Farms, Inc., Paula Cooley, Patricia C. McDonald, Steven A. McDonald, David A. McDonald, Juanita M. Rutherford, individually and as the executor of the estate of Glenn C. Rutherford, Dwight Ridgley, L.Sue Ridgley, William White, Roger White, LaVerne White, Alan White, Dale Karl, Larry Karl, Gladys Curry, Victoria Hood, Holly Hood Villaire, Donna Hood Pointer, Jacqueline Calamello, David Sheets, Ron Evans, Marge Evans, Steve Weber, Mountain View Ranch, L.L.C., Karen Monfre (hereinafter referred to as the Macon County Property Owners), by their attorneys, Bolen, Robinson & Ellis, LLP, and for their Submission of Alternate Route in the above-entitled matter state as follows:

1. ATXI has proposed running a 345 kV Transmission Line from a proposed substation in Pana, Illinois, north to a proposed substation in Mt. Zion, Illinois, and then east to a proposed substation in Kansas, Illinois.

2. As will be set forth in further detail in later submissions, the Macon County Property Owners assert that there has been no demonstrated need for the proposed substation in Mt. Zion, and therefore the line should stop at the Pana proposed substation.

3. Should the ICC deny that portion of ATXI's request to run a line from Pana north to Mt. Zion and east to Kansas, then the Macon County Property Owners submit that the burden should be on ATXI to submit a new petition that supports connecting Pana and Kansas with a 345 kV Transmission Line and provide an alternative route that does not go north to Mt. Zion.

4. Alternatively, if there is a demonstrated need to run a 345 kV Transmission Line from the proposed Pana substation to the proposed Kansas substation that can be addressed in this cause, then the Macon County Property Owners propose that ATXI upgrade or otherwise utilize the existing 138 kV Transmission Line that already runs southerly from Pana to Kansas as shown in Petition Exhibit A (Part 4 of 5).

5. Since the easements for the 138kV line from Pana to Kansas already exist, there should not be any effect on new landowners. Additionally, the ICC is presumably already in possession of the names and addresses of the property owners on those existing easements because they should have been submitted when that project was approved.

6. To the extent the Administrative Law Judges will require the re-submission of every landowner along the existing 138kV line easements from Pana to Kansas, the Macon County Property Owners request additional time to comply. ATXI has had 8 years and virtually unlimited resources to identify the landowners on its proposed path. The limited amount of time and resources available to Intervenors to provide alternative routes is insufficient and may violate due process principals.

7. Should the ICC persist in shifting the burden of identifying routes from ATXI to Staff and Intervenors, Macon County Property Owners also request additional time to identify an alternative route that travels along an abandoned Penn Central Rail Road bed which runs through Macon and Moultrie Counties.

WHEREFORE, the Macon County Property Owners herewith pray that the portion of ATXI's request to run a 345 kV Transmission Line from a proposed substation in Pana, Illinois, north to a proposed substation in Mt. Zion, Illinois, and then east to a proposed substation in Kansas, Illinois, be denied and ATXI be required to submit a new petition for an alternate route from Pana to Kansas should it choose to do so. Alternatively, the Macon County Property Owners propose that ATXI be required to upgrade or otherwise utilize the existing 138 kV Transmission Line easements running from Pana to Kansas for that portion of its proposed 345 kV Transmission Line, and to the extent required, request additional time to identify the landowners along these existing easements. The Macon County Property Owners further request additional time to identify an alternate route along an abandoned Penn Penn Central Rail Road bed which runs through Macon and Moultrie Counties.

DATED this 28th day of December, 2012

By: /s Christopher M. Ellis
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PROOF OF SERVICE

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Jennie E. Fiesler, Gas & Electric Service Co., Inc., Beverly C. McDonald, Be Mac Farms, Inc., Paula Cooley, Patricia C. McDonald, Steven A. McDonald, David A. McDonald, Juanita M. Rutherford, individually and as the executor of the estate of Glenn C. Rutherford, Dwight Ridgley, William White, Roger White, LaVerne White, Alan White, Dale Karl, Larry Karl, Gladys Curry, Victoria Hood, Holly Hood Villaire, Donna Hood Pointer, Jacqueline Calamello, David Sheets, Ron Evans, Marge Evans, Steve Weber, Mountain View Ranch, L.L.C., Karen Monfre (hereinafter referred to as the Macon County Property Owners), herewith certify that I did on the 28th day of December, 2012, electronically file with the Illinois Commerce Commission, a Submission of Alternate Route on behalf the Macon County Property Owners, and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis
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