

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 Leon Corzine, by his attorneys, Bolen, Robinson & Ellis, LLP, and for his Submission of Alternate Route in the above-entitled matter state as follows:

1. Leon Corzine has filed this date a Petition for Leave to Intervene which has not yet been granted. In anticipating of that petition being granted, Leon Corzine files this Submission of Alternate Route in order to comply with the December 31, 2012, deadline.
2. 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.
3. As will be set forth in further detail in later submissions, there has been no demonstrated need for the proposed substation in Mt. Zion, and therefore the line should stop at the Pana proposed substation.
4. 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 Leon Corzine submits 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 Leon Corzine proposes 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, Leon Corzine requests 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, Leon Corzine also requests additional time to identify an alternative route that travels along Route 51 North.

WHEREFORE, Leon Corzine herewith prays 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, Leon Corzine proposes 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. Leon Corzine further request additional time to identify an alternate route along Route 51.

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 Leon Corzine, 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 Leon Corzine, and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis
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