

**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

**VERIFIED RESPONSE OF THE NATURE CONSERVANCY TO THE STOP
THE POWER LINES COALITION'S MOTION TO AMEND THE CASE
MANAGEMENT PLAN TO EITHER ELIMINATE THE DECEMBER 31, 2012
FILING REQUIREMENT OR TO EXTEND THE TIME FOR SAME**

The Nature Conservancy ("TNC"), by its attorneys Quarles & Brady LLP, and pursuant to the direction of the Administrative Law Judges, hereby responds to the Motion of the Stop the Power Lines Coalition ("Coalition") to Amend the Case Management Plan to either eliminate the December 31, 2012 filing requirement or to extend the time for such filing until February 11, 2013, when Staff and Intervenor Direct Testimony is due.

TNC supports at least some modification of the current case schedule relating to the filing of alternative route information. In further support of this response, TNC states:

1. The schedule set forth in Section IV of the Case Management Plan Order issued by the Administrative Law Judges on December 14, 2012 requires Staff and Intervenors to make

a filing by December 31, 2012 that identifies alternative routes they propose for the transmission line that is the subject of this proceeding.

2. The Case Management Plan states that Staff and Intervenors identifying an alternative route must provide the names and addresses of affected landowners.
3. On December 17, 2012, TNC propounded its First Set of Data Requests to Ameren Transmission Company of Illinois ("Ameren"). The data requests sought the names and addresses of landowners along an existing Ameren transmission line. The data requests were intended to facilitate TNC's identification and submission of an alternative route -- along with the identification and submission of the names and addresses of landowners affected by such routes -- by the December 31, 2012 filing deadline. Accordingly, TNC requested that Ameren respond to such requests by December 21, 2012.
4. Just today, counsel for Ameren indicated to TNC's counsel that it had responded to TNC's First Set of Data Requests. Although Ameren did not email those responses, TNC's counsel discovered Ameren's responses on the Ameren Extranet site (available at: <https://cwxi.ameren.com/default.aspx>). Copies of the Ameren responses are attached hereto as Exhibit A.
5. In its "responses," Ameren objects to the requests, stating that the names and addresses of landowners is "irrelevant and immaterial" to this proceeding. However, Ameren then states that Staff and Intervenors proposing an alternative route has an absolute obligation to furnish such information within a matter of days. Thus, notwithstanding its objection, Ameren itself recognizes that the name and address information is both relevant and material.

6. Despite Ameren's objection, TNC continues to operate under the current Case Management Plan and will use its best efforts to file its alternative route on December 31, 2012. However, given TNC's sincere interest in filing a thoughtful alternative route with accurate information and given that Ameren has failed to answer data requests that would provide information directly relevant and material to the alternative route filing, TNC believes that it would be appropriate to modify the December 31, 2012 alternative route filing due date.

WHEREFORE, TNC respectfully requests that an amended case management plan be issued that modifies the December 31, 2012 filing date for Staff and Intervenors to identify alternative routes and affected landowners. In the alternative, TNC requests that an amended case management plan order be issued that requires Staff and Intervenors to identify alternative routes and affected landowners in their Direct Testimony in this proceeding to be filed on February 11, 2013.

Respectfully submitted,

THE NATURE CONSERVANCY

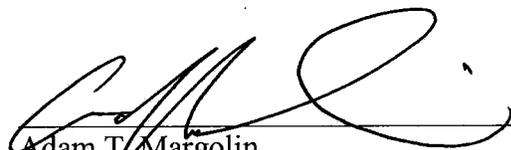
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STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

VERIFICATION

Adam T. Margolin, being first duly sworn, on oath deposes and says that he is one of the attorneys for The Nature Conservancy, that he has read the above and foregoing document, knows of the contents thereof, and that the same is true to the best of his knowledge, information, and belief.


Adam T. Margolin

Subscribed and sworn to me
this 28 of December 2012.





EXHIBIT A

**Ameren Transmission Company of Illinois
Response to The Nature Conservancy Data Requests
Docket Nos. 12-0598**

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 Various Counties in the State of Illinois.

Data Request Response Date: 12/31/2012

TNC 1.02

Please provide the name and address of each landowner (based upon relevant county property tax records) that would have been entitled to notice of this proceeding and/or notice of Ameren's proposed Primary or Alternate transmission line route if Ameren had proposed to locate the transmission line that is the subject of this proceeding (the "Proposed Line") along Ameren's existing 138,000-volt transmission line beginning at the intersection of Ameren's proposed Alternate Route for its Proposed Line and Ameren's existing 138,000-volt transmission line at the Meredosia Substation Siting Area, as illustrated on the Cass County Map available on Ameren's Illinois Rivers Project website (<http://www.ilriverstransmission.com/linkclick.aspx?fileticket=kVuTArD4XgU%3d&tabid=1509>) (the "Map") and running northeast and then north to the point where that 138,000-volt transmission line intersects with the proposed Alternate Route for Ameren's Proposed Line north of Hager Township, as illustrated on the Map.

RESPONSE

Objection. ATXI does not have the information requested, and is not otherwise obligated to produce the same. Further, the information is available in the public domain. Further, the information is irrelevant and immaterial. Further, pursuant to the Case Management Plan adopted on December 14, 2012, any Intervener electing to identify an alternate route must do so no later than December 31, 2012. In doing so, such Intervener must provide names and addresses of affected landowners if such landowners are not already affected by either ATXI's primary or alternative routes. As such, under the Case Management Plan the Intervener provides the information sought in this Data Request, all of which as stated is publicly available from the tax records as also noted by the ALJs Case Management Plan.

**Ameren Transmission Company of Illinois
Response to The Nature Conservancy Data Requests
Docket Nos. 12-0598**

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 Various Counties in the State of Illinois.

Data Request Response Date: 12/31/2012

TNC 1.03

Please provide the name and address of each landowner (based upon relevant county property tax records) that would have been entitled to notice of this proceeding and/or notice of Ameren's proposed Primary or Alternate transmission line route if Ameren had proposed to locate the transmission line that is the subject of this proceeding (the "Proposed Line") beginning at the point where Ameren's proposed Alternate Route intersects with Ameren's existing 138,000-volt transmission line north of Hageners Township as illustrated on the Cass County Map available on Ameren's Illinois Rivers Project website

(<http://www.ilriverstransmission.com/linkclick.aspx?fileticket=kVuTArD4XgU%3d&tabid=1509>) (the "Map") and running approximately north to the point where that existing 138,000-volt line intersects with the Primary and Alternate

Routes for the Proposed Line, southwest of Frederick Township as illustrated on the Map.

RESPONSE

Objection. ATXI does not have the information requested, and is not otherwise obligated to produce the same. Further, the information is available in the public domain. Further, the information is irrelevant and immaterial. Further, pursuant to the Case Management Plan adopted on December 14, 2012, any Intervener electing to identify an alternate route must do so no later than December 31, 2012. In doing so, such Intervener must provide names and addresses of affected landowners if such landowners are not already affected by either ATXI's primary or alternative routes. As such, under the Case Management Plan the Intervener provides the information sought in this Data Request, all of which as stated is publicly available from the tax records as also noted by the ALJs Case Management Plan.