

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois )  
)  
Petition for 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 ) No. 12-0598  
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. )

ADAMS COUNTY PROPERTY OWNERS AND TENANT FARMERS  
ALTERNATE TRANSMISSION LINE ROUTE PROPOSALS

COME NOW the Adams County Property Owners and Tenant Farmers (“ACPO”) and  
for their Alternate Transmission Line Proposals, state as follows:

I. Introduction

As an initial matter, ACPO objects to ATXI’s Petition and requests the Commission deny  
the same. If the Commission approves the Petition over the ACPO’s objection, then ACPO  
submits the following three alternative routes for the Commission’s consideration and approval.

Moreover, ACPO filed a motion to extend the deadline to provide alternative routes. As  
of the time of this filing, the ALJ has not ruled on ACPO’s motion. ACPO submits its alternative  
routes pursuant to the Case Management Plan in place at the time of this submission. ACPO  
reserves the right to amend or modify its alternative routes if the ALJ grants its motion for an  
extension of time.

II. Alternate Route No. 1

ATXI has provided numerous maps with its Petition, and has provided property owners maps during town hall meetings. Some of the maps ATXI provided outline existing transmission line routes in Adams County. ATXI currently has a 138,000 V transmission line running near the route ATXI proposed for its Primary Route and Alternate Route. Attached hereto as **Exhibit 1** is a map titled "Proposed Routes Adams County". The Proposed Routes Adams County Map shows the 138,000 V transmission line. The 138,000 V route runs approximately two miles north of, and parallel to, the current Primary route. ACPO has marked Exhibit 1 to show the proposed alternative transmission line. ACPO shall refer to the route in **Exhibit 1** as ACPO Alternative Route 1, and requests the Commission adopt said route as an alternative to the routes proposed by ATXI.

III. ACPO Alternative Route No. 2.

ACPO objects to ATXI's Primary Route. If, however, the Commission accepts a version of ATXI's Primary Route over ACPO Alternative Route 1, then ACPO requests the Commission adopt a version of the Primary Route that has the least impact on property owners along the route. As the Primary Route is currently proposed, it would place the transmission line unreasonably close to the farm operation and homestead of Edward Behrensmeyer. To avoid such an intrusion, ACPO proposes ACPO Alternative Route No. 2, which is attached hereto as **Exhibit 2**. The name and address of affected landowners is attached hereto is attached hereto as **Exhibit 3**.

IV. ACPO Alternative Route No. 3.

ACPO objects to ATXI's Alternative Route. If, however, the Commission accepts a version of ATXI's Alternative Route over the Primary Route or ACPO Alternative Route 1, then ACPO requests the Commission adopt a version of the Alternative Route that has the least impact on property owners along the route. As the Alternative Route is currently proposed, it would place the transmission lines unreasonably close to the dairy operation of Mr. Greg Edwards and the home of Katherine and Jerry Thomure. To avoid such an intrusion, ACPO proposes ACPO Alternative Route No. 3, which is attached hereto as **Exhibit 4**. The name and address of affected landowners is attached hereto as **Exhibit 5**.

DATED this 31st day of December, 2012.

RESPECTFULLY SUBMITTED



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Brian R. Kalb, #6275228  
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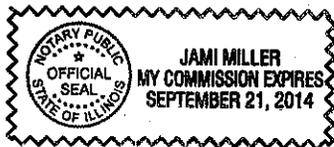
STATE OF ILLINOIS        )  
  ) SS  
COUNTY OF MADISON     )

VERIFICATION

Brian R. Kalb, being first duly sworn, deposes and says he is one of the practicing attorneys in the firm of Byron Carlson Petri & Kalb, LLC, and one of the attorneys for LARRY AND TERRI GROCE, BRENT AND JACQUELINE MAST, STEVE MAST, KEITH C. FLESNER, JOHN AND BETTY PETERS, EDWARD G. BEHRENSMEYER, DAVID G. LEWIS, GREGORY L. EDWARDS, ARSENIUS AND ELEANOR FLESNER, MARVIN AND DENISE MILLER, MELVIN LOOS, AND FRED AND CONNIE LOOS, LOOS FARM SUPPLY, INC., ALEXANDER HOUSE, RICHFIELD FARMS, INC., CENTER SCHOOL FARMS, STUART KAISER, BETTY J. SPECKHART, RUTH PETERS, KATHERINE AND JERRY THOMURE, MARK PETERS and IRENE L. WEBSTER (hereinafter referred to as the "ADAMS COUNTY PROPERTY OWNERS AND TENANT FARMERS"), and he is duly authorized to execute this Alternative Transmission Line Route Proposals; that he has read the above and foregoing document, has knowledge of the facts stated therein and herewith states that the matters set forth therein are true in substance and in fact.

By:   
Brian R. Kalb, #6275228  
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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 31st day of December, 2012.

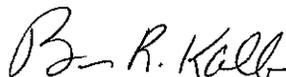


  
NOTARY PUBLIC

PROOF OF SERVICE

STATE OF ILLINOIS        )  
                                  ) SS  
COUNTY OF MADISON     )

I, Brian R. Kalb, BEING AN ATTORNEY ADMITTED TO PRACTICE IN THE State of Illinois and one of the attorneys representing ADMS COUNTY PROPERTY OWNERS AND TENANT FARMERS, hereinwith certify that I did on the 31st day of December, 2012, electronically file with the Illinois Commerce Commission, Adams County Property Owners and Tenant Farmers Alternate Transmission Line Route Proposals, and electronically served the same upon the persons identified on the Commission's official service list.



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