

**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

**THE NATURE CONSERVANCY'S CORRECTED
IDENTIFICATION OF AN ALTERNATIVE ROUTE**

The Nature Conservancy, by its attorneys Quarles & Brady LLP, and pursuant to the Case Management Plan, hereby identifies an alternative route to the primary and alternate routes proposed by Ameren Transmission Company of Illinois ("Ameren") for the transmission line that is the subject of this proceeding.

In further support of The Nature Conservancy's alternative route, The Nature Conservancy states:

1. On November 7, 2012, Ameren filed a Petition with the Illinois Commerce Commission ("Commission") seeking permission to route a transmission line across the State of Illinois. In its Petition, Ameren identified a primary and alternate route for the transmission line.

2. The schedule set forth in Section IV of the December 14, 2012 Case Management Plan requires Commission Staff and Intervenors to make a filing by December 31, 2012 that identifies alternative routes for the transmission line that is the subject of the proceeding. The Nature Conservancy has identified significant issues associated with Ameren's primary and alternate routes for the transmission line, and has identified two potential routes for the transmission line that address those issues. Accordingly, The Nature Conservancy is submitting the instant filing with two maps and property owner information.
3. The focus of The Nature Conservancy's concern in this proceeding relates to Ameren's proposed "spur" line that would begin at approximately the Meredosia Substation Siting Area and run north and to the northeast. In particular, The Nature Conservancy opposes Ameren's primary route for that portion of the proposed transmission line located in Brown County because it would have a substantial adverse impact on important Illinois natural resources, including at and around a site known as the Spunky Bottoms Preserve (a/k/a the Merwin Preserve at Spunky Bottoms) (the "Preserve"). The Preserve contains land owned in fee by The Nature Conservancy as well as privately owned land subject to conservation easements, and the Preserve is an Illinois Natural Areas Inventory site located on a restored floodplain adjacent to the Illinois River. The Preserve is home to approximately 20 threatened and endangered species, and both the Preserve and the surrounding land have great ecological value that would be impaired by siting Ameren's transmission line on the primary route currently proposed. Locating the transmission line on Ameren's primary route would adversely impair not only the Preserve but also nearby

tracts of bluff and upland forests. Accordingly, The Nature Conservancy opposes Ameren's primary route.

4. With respect to Ameren's alternate route for the "spur" line, The Nature Conservancy opposes some segments of Ameren's alternate route in Cass, Brown, and Schulyer Counties because of adverse impacts that the alternate route would have on the Illinois Department of Transportation's LaGrange Wetland Mitigation Bank (the "IDOT Wetland Bank") and additional contiguous tracts of bluff and upland forests in Schulyer County.
5. Accordingly, The Nature Conservancy proposes two alternatives for the Commission's consideration (although The Nature Conservancy would also be open to other alternatives that avoid The Nature Conservancy's areas of concern). Both of The Nature Conservancy's alternatives are modifications to Ameren's alternate route for that portion of the proposed transmission line located in Cass, Brown, and Schulyer Counties; both of The Nature Conservancy's proposed routes would avoid the IDOT Wetland Bank; and both would reduce upland habitat fragmentation in Schulyer County.
 - a. The first and most preferable alternative route identified by The Nature Conservancy is shown on the map in Exhibit A attached hereto and made a part hereof. Exhibit A also includes the affected landowner list for The Nature Conservancy's preferred alternative route. The Nature Conservancy's preferred route would follow an existing 138 KV Ameren line, which would have the advantage of resulting in little or no new habitat fragmentation.
 - b. The second alternative route suggested by The Nature Conservancy is shown in Exhibit B attached hereto and made a part hereof. Exhibit B also includes the affected landowner list for this alternative route. The Nature Conservancy's

second alternative route also would follow part of the same existing 138 KV Ameren line that is followed in The Nature Conservancy's preferred alternative, but would not follow the part of that line that currently is located at Beardstown and would not cross the Illinois River at the same location as the existing 138 KV Ameren line; instead, it would create a new segment primarily across agricultural lands, crossing the Illinois River south of Beardstown.

WHEREFORE, The Nature Conservancy respectfully requests that the Commission:

1. Reject Ameren's proposed routes with respect to the "spur" line that would begin at approximately the Meredosia Substation Siting Area and run north and northeast; and
2. Adopt The Nature Conservancy's preferred alternative route, as depicted in Exhibit A hereto; or
3. Alternatively, adopt The Nature Conservancy's second alternative route, as depicted in Exhibit B hereto.

Respectfully submitted,

THE NATURE CONSERVANCY

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