

STATE OF ILLINOIS
 ILLINOIS COMMERCE COMMISSION
 2013 FEB - 11 A 10: 58

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.)

CHIEF CLERK'S OFFICE
 Docket No. 12-0598

OBJECTION AND RESPONSE TO PETITION TO INTERVENE

Now come the objectors, Mary Kathleen Hamblin, individually, and Gregory K. Hamblin and Mark W. Hamblin, as Trustees under a Declaration of Trust Dated January 11, 1990 (collectively "Hamblins"), by and through their attorneys, Featherstun, Gaumer, Postlewait, Stocks, Flynn & Hubbard, and in support of their Objection and Response to the Petition to Intervene by Janet Roney, the objectors state as follows:

I. THE ROUTE DISRUPTS FARMING OPERATIONS

1. The route proposed by Ameren Transmission Company of Illinois, the Petitioner, is proposed upon existing utility right-of-way and will not be disruptive to current or future farming operations in this area.
2. The route proposed by Janet Roney is going through valuable tillable farm ground owned by the Hamblins. The easements that are necessitated by the proposed alternate route for this electrical service line are 50 feet in width and will cross farm ground owned by Hamblins.
3. The poles for this transmission line have a very wide base. Ameren will most

likely protect the base with fencing or some type of barrier. This will make farming with large farming equipment very clumsy and potentially dangerous. Further, the alternative route will permanently remove some valuable farm ground from producing valuable food resources.

4. During maintenance of this alternative route, farming production will be disrupted and crops may be destroyed.

5. It appears to be completely counterproductive to disrupt the farm ground and the farming operations of these properties when an existing utility easement exists on the route proposed by Ameren, that does not disrupt the farming operation.

II. THE PETITIONER MUST BE REPRESENTED BY COUNSEL

6. The Petitioner, Janet Roney, represents that she is a landowner. However, the land referenced by Ms. Roney appears to be owned by the Roger and Janet Roney Trust.

7. A Trust, under the Illinois Code of Civil Procedure, must be represented by an attorney and may not be represented by an individual. The Lazy 'L' Family Preservation Trust v. First State Bank of Princeton, 167 Ill.App.3d 624 (1988).

8. Ms. Roney does not appear to be an attorney licensed and authorized to practice law in the State of Illinois or before this Commission.

III. THE PROPOSED ALTERNATIVE ROUTE FAILS TO ADHERE TO THE COMMISSION RULES

9. The Petition filed by Janet Roney is titled "Petition to Intervene" and in fact is an identification of an alternative route.

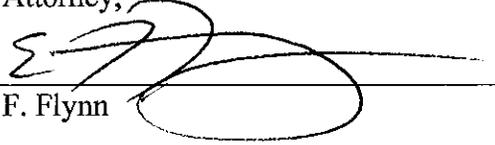
10. Pursuant to the rules in this case, the Petitioner is required to identify whether the alternative route impacts any new landowners apart from the landowners previously affected and to provide their name and address; the Petition filed by Janet Roney herein does not allege any of these facts.

11. The Petition is deficient because it fails to comply with the rules set forth by this Commission.

WHEREFORE, due to the substantive and technical reasons set forth herein, Petitioners pray that this Honorable Commission dismiss the Petition to Intervene or in the alternative, dismiss the alternate route proposed by Ms. Roney.

Respectfully submitted,

MARY KATHLEEN HAMBLIN,
INDIVIDUALLY, AND GREGORY K.
HAMBLIN AND MARK W. HAMBLIN, AS
TRUSTEES UNDER A DECLARATION OF
TRUST DATED JANUARY 11, 1990,
by their Attorney,



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CERTIFICATE OF SERVICE

I certify that on the ~~30th~~^{30^m} day of January, 2013, at 5:00 p.m., I e-mailed a copy of the foregoing in the manner set forth:

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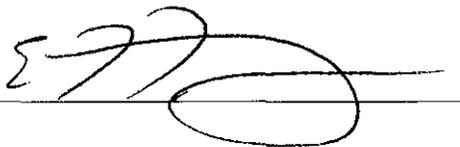
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A handwritten signature in black ink, appearing to read 'E. Flynn', is written over a horizontal line.