

**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 Illinois 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

**INTERVENOR DEBPAH D. ROONEY'S RESPONSE TO
STAFF MOTION TO REVISE CASE MANAGEMENT PLAN; and**

**REPLY TO AMEREN TRANSMISSION COMPANY OF ILLINOIS'
RESPONSE TO STAFF MOTION TO REVISE CASE MANAGEMENT PLAN**

NOW COMES Intervenor, Deborah D. Rooney, by her counsel, and in Response to the Motion to Revise the Case Management Plan, filed by Staff of the Illinois Commerce Commission (Staff) and in Reply to the Response of Ameren Transmission Company of Illinois (ATXI) to the Staff Motion to Revise the Case Management Plan, and states as follows:

1. The Staff Motion to Revise the Case Management Plan should be denied.
2. The "compromise proposal" of ATXI should be denied.
3. Both the suggested Staff revision and the ATXI proposed compromise shorten by one week, from March 29, 2013 to March 22, 2013, the date by which Staff and Intervenor direct testimony must be submitted. Such a shortening of the time period within which the owners of real property sought to be taken by ATXI must prepare and submit direct testimony is both unnecessary and unfair.
4. ATXI itself filed its petition under statutory provisions providing for expedited procedures in order to unfairly burden such landowners and to deprive them of the opportunity adequately to prepare any defense when ATXI has had the current project in various phases of planning for a number of years. ATXI should not complain about a Staff effort to reduce any amount of time available to ATXI.

5. Staff has other counsel and other employees available who can fulfill the duties that Attorney Kelly A. Armstrong will be unable to attend to during the time period in question.

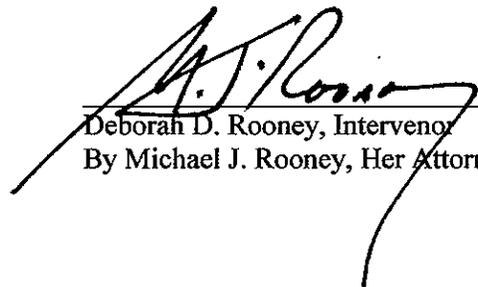
6. If such other counsel and other employees are not available to Staff, the request of Staff should be to extend any deadlines that negatively impact landowners, not to shorten such deadlines.

7. Paragraph 8 of Staff's Motion states, in part, "Accordingly, this request would not be prejudicial to any party." Such a statement is patently incorrect since many Intervenor are not themselves experienced in proceedings before the Illinois Commerce Commission and may be represented by counsel who are also not experienced in such proceedings.

8. The copy of the Staff Motion to Revise the Case Management Plan that was sent to the service list contains the following concluding sentence: "WHEREFORE Staff of the Illinois Commerce Commission respectfully requests that its Motion to Revise the Case Management Plan be granted in accordance with Administrative Law Judges grant ATXI's Petition insofar as it requests dismissal without prejudice of the Pana - Mt. Zion portion of the project." Such sentence contains a prayer that neither Intervenor Deborah D. Rooney nor her counsel understand and for which, therefore, further elucidation is requested.

WHEREFORE, Intervenor Deborah D. Rooney respectfully requests the Illinois Commerce Commission deny Staff's Motion to Revise the Case Management Plan; and further respectfully requests that ATXI's proposed compromise schedule also be denied; and further respectfully requests that if either the Staff proposal or the ATXI proposal is granted in part, that the original Case Management Plan date for submission of Staff and Intervenor Direct Testimony remain March 29, 2013.

Respectfully submitted,


Deborah D. Rooney, Intervenor
By Michael J. Rooney, Her Attorney

STATE OF ILLINOIS)
) SS
COUNTY OF KANE)

VERIFICATION

Deborah D. Rooney, being first duly sworn, deposes and says she is the Intervenor named in the accompanying Response to Staff Motion to Revise Case Management Plan and Reply to Ameren Transmission Company of Illinois' Response to Staff Motion to Revise Case Management Plan, that she has read the accompanying document, has knowledge of the facts stated therein and states that the matters set forth therein are true in substance and in fact.

Deborah D. Rooney

Deborah D. Rooney
40W897 Fox Creek Drive
St. Charles, IL 60175
630-584-8811

SUBSCRIBED AND SWORN TO before me, a Notary Public in the county and state aforesaid on this first day of February, 2013.

Elena Belsuzarri 2-1-13

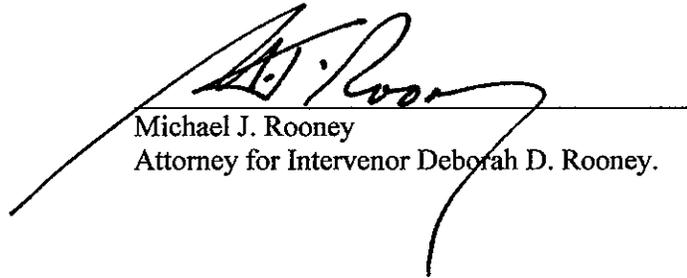
NOTARY PUBLIC



CERTIFICATE OF SERVICE

I, Michael J. Rooney, the attorney for Intervenor Deborah D. Rooney, certify that I caused to be served copies of the foregoing Response to Staff Motion to Revise Case Management Plan and Reply to the Response of Ameren Transmission Company of Illinois' to Staff Motion to Revise Case Management Plan via electronic delivery of email to the Parties of Record named on the Illinois Commerce Commission service list for ICC Docket 12-0598 on February 1, 2013.

Respectfully Submitted,



Michael J. Rooney
Attorney for Intervenor Deborah D. Rooney.

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