**STATE OF ILLINOIS**
**ILLINOIS COMMERCE COMMISSION**

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| AMEREN TRANSMISSION COMPANY OF ILLINOIS<br><br>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 |

**STOP THE POWER LINES COALITION'S MOTION FOR LEAVE TO FILE AN ALTERNATE ROUTE PROPOSAL *INSTANTER***

Stop the Power Lines Coalition ("Coalition") moves for leave to file *instanter* the attached Alternate Route Proposal and for Order Directing the Clerk to Issue Notice to Certain Affected Landowners. In support of its motion, the Coalition submits the Affidavit of Peggy Mills attached hereto as Exhibit 1. In further support of its motion, the Coalition states:

1. The schedule established in 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. Thus, the affected landowners only had 17 days to submit alternate routes and identify affected landowners.

2. On January 7, 2013, ATXI filed a Motion for Leave to file an Amended Landowner List and asked that an Order be issued allowing its request.

3. ATXI's Motion was granted in part by the Administrative Law Judges on January 16, 2013, and the Administrative Law Judge ordered that the ATXI petition only was completely filed as of January 7, 2013.

4. The Administrative Law Judges announced in their January 16 Order and at the January 17, 2013 status hearing that a revised case management order will be issued as a result. The Administrative Law Judge's further indicated that the revised schedule will be issued after January 24, 2013, when the Commission rules on the Administrative Law Judges' recommendation for a 75 day extension of the date for a Commission decision.

5. As reflected in the attached affidavit of Peggy Mills, the Coalition still had members joining in December, 2012, and lacked the expertise necessary to design alternatives and was forced to rely exclusively on volunteer help which simply was not available during and shortly after the holidays.

6. The Coalition has now completed two alternative routes that it supports. The Coalition's proposed Alternate Route Proposals are attached as Exhibit 2.

7. The Coalition now seeks leave to file its Alternate Route Proposals *instanter*.

8. ATXI identified all affected landowners only ten days ago for its Pana to Mt. Zion segment, and other parties have filed errata and corrections to their route designations since December 31, 2012.

9. If the Commission approves a 75-day extension for the decision date, the landowners who receive notice of the Coalition's alternate routes designation will have far more notice than the landowners notified after the December 31, 2012 date would have received had the original schedule held. The seventeen days that the Coalition was given to designate alternate routes and identify affected landowners under the original December 14, 2012 order was not enough time for the Coalition to meet that requirement.

10. Under the circumstances, and assuming the Commission grants a 75-day extension, no harm will result from the filing of an alternate route proposals and lists of affected landowners.

11. Fairness and equity demand the Coalition be allowed to file their Alternative Route Proposals.

WHEREFORE, the Coalition prays that it be given leave to file the attached Alternate Route Proposals *instanter*.

Respectfully submitted,

Dated: January 17, 2013

STOP THE POWER LINES COALITION

/s/ Edward R. Gower
Edward R. Gower
One of Its Attorneys

Edward R. Gower
Hinshaw & Culbertson LLP
400 South Ninth Street, Suite 200
Springfield, IL 62701
217-528-7375
egower@hinshawlaw.com

Adam Guetzow
Hinshaw & Culbertson LLP
222 N. LaSalle St., Suite 300
Chicago, IL 60601-1081
312-704-3129
aguetzow@hinshawlaw.com