

1 STATE OF ILLINOIS
2 ILLINOIS COMMERCE COMMISSION
3

4 Ameren Transmission Company of)
5 Illinois,)
6)
7 Petition for a Certificate of Public)
8 Convenience and Necessity, pursuant to)
9 Section 8-406.1 of the Illinois Public)
10 Utilities Act, and an Order pursuant to) Case No. 12-0598
11 Section 8-503 of the Public Utilities Act,)
12 To Construct, Operate and Maintain a New)
13 High Voltage Electric Service Line and)
14 Related Facilities in the Counties of Adams,)
15 Brown, Cass, Champaign, Christian, Clark,)
16 Coles, Edgar, Fulton, Macon, Montgomery,)
17 Morgan, Moultrie, Pike, Sangamon,)
18 Schuyler, Scott, and Shelby, Illinois.)
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20 AFFIDAVIT OF JOSEPH WOODALL
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22 (Submitted on Behalf of the Shelby County Landowners' Group)
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24 Now comes JOSEPH WOODALL, and after first being duly sworn upon his oath deposes

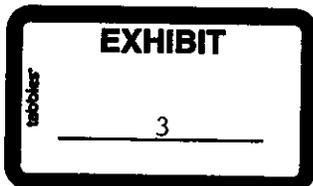
25 and says:

26 **Q.** Please state your name and address and occupation for the Record.

27 **A.** My name is Joseph Woodall. I reside at R.R. 1 Box 37, Shelbyville, Shelby County,
28 Illinois. I am the Supervisor of Rose Township, Shelby County, Illinois.

29 **Q.** What interest do you have in the pending litigation, I.C.C. docket number 12-0598?

30 **A.** First and foremost, I own a number of acres of farm-ground and woodlands which will be
31 directly affected by the proposed alternate route set forth by the Moultrie County Property
32 Owners. My ground is located south of Shelbyville, Illinois. Some of my property are bottom
33 lands flooded by the Kaskaskia River, the same ground upon which the Moultrie County
34 Property Owners propose to construct the alternate route.



35 Q. Are you familiar with the lands which are potentially affected by the alternate route
36 proposed by the Moultrie County Property Owners'?

37 A. Yes, I am. I have lived in Shelby County my entire life. Further, my land is located in
38 Rose Township and I regularly travel the roads and area which encompasses the potentially
39 affected land. Further, I am familiar with the topographic layout of the area in Shelby County
40 which is affected by the "alternate route" of the Moultrie County Property Owners.

41 Q. Could you please describe the terrain and/or topographic conditions of the area within the
42 affected lands of Shelby County?

43 A. Beginning in the Tower Hill, Illinois area, the land is gently rolling with areas of flat,
44 productive, agricultural farmland. Thereafter, the line will begin to pass through many acres of
45 hilly, wooded acreage. This hilly wooded acreage is comprised of oak/hickory woodlands; and,
46 further, supports numerous species of wildlife, including, but not limited to white-tailed deer and
47 wild turkeys, all of which provides for valuable hunting opportunities for the county residents
48 and, others alike.

49 Once the proposed route nears Shelbyville, Illinois, the line will pass through the
50 Kaskaskia River bottoms and across the River, a major tourist spot in Central Illinois. Many
51 individuals own river front property wherein they maintain cabins. Also, many visitors, and
52 residents alike, travel the river to fish, hunt, and boat on the river.

53 Also located in this area are the City of Shelbyville's water fields. The alternate route
54 proposed by the Moultrie County Property Owners, according to their map, would be placed
55 directly above the water fields, which are used to supply the City of Shelbyville with potable
56 water for their residents. Numerous water wells are placed on the water fields in order to tap the
57 aquifer which lies underneath. To my knowledge, the Moultrie County Property Owners have

58 failed to address the impact upon the water fields; and, further, have failed to determine if the
59 power poles can even be placed upon the lands without negatively impacting the water resources
60 of the City of Shelbyville.

61 Another concern I have about the proposed alternate route of the Moultrie County
62 Property Owners is that the line is to be constructed on bottom land (of which I own
63 approximately 26 acres) near the Kaskaskia River. The water flow of the River is managed by
64 the United States Corps of Engineers, and when the gates are opened to release 4,500 cubic feet
65 of water per second, my bottom grounds, along with the bottom grounds of other individuals,
66 will flood.

67 Once the proposed route clears the Kaskaskia River bottoms, it appears to run through
68 gently rolling hills, until finally reaching prime, agricultural farmland. Along, the route, the line
69 appears to affect numerous homes and farms, however, I am unable to discern the exact number
70 without the Moultrie County Property Owners' submitting the exact location of their proposed
71 route.

72 **Q.** What affect will the proposed route(s) of Ameren Transmission Company of Illinois have
73 upon your interests and other interests of those in the Shelby County Landowner's Group?

74 **A.** Ameren Transmission Company of Illinois' proposed routes have no direct impact upon
75 my land or the land of anyone else in the Shelby County Landowner's Group. The route(s)
76 chosen by Ameren, for the Pana to Mt. Zion and Mt. Zion to Kansas routes, avoid the
77 recreational areas, woodlands, and agricultural farmland, while the "alternate route" advanced by
78 the Moultrie County Property Owners' does not.

79 **Q.** Are you aware of any public bodies in Shelby County which have adopted a position in
80 this matter?

81 A. Yes. I am personally aware that Rose, Shelbyville, and Ash Grove Townships have
82 passed Resolutions in support of Ameren's proposed routes and in opposition of the alternate
83 route proposed by the Moultrie County Property Owners. In fact, I presented the resolution, a
84 copy of which I attach hereto as Exhibit A, to the Rose Township Board for consideration and
85 adoption. *See also* Exhibits B and C, attached hereto.

86 Q. Is Exhibit A a true and accurate copy of the original Resolution which was passed by the
87 Rose Township Board of Trustees?

88 A. It is.

89 Q. Was the Resolution passed by a unanimous vote of the Rose Township Board of
90 Trustees?

91 A. It was. All Trustees were present, and after discussion, the Resolution was passed by a
92 unanimous, affirmative, vote.

93 Q. Was the Shelbyville Township Resolution passed by a vote of the Shelbyville Township
94 Board of Trustees?

95 A. It was. I have examined the original and it was signed by the Supervisor and attested to
96 by the township clerk.

97 Q. Was the Ash Grove Township Resolution passed by a vote of the Ash Grove Township
98 Board of Trustees?

99 A. It was. I examined the original and it was signed by the Supervisor and attested to by the
100 township clerk.

101 Q. Are you aware of any other governmental entities which are considering adopting a
102 position in this matter?

103 A. The Shelby County Board has on its April Board Meeting, public agenda, their
104 consideration of adopting a Resolution in substantially the same format. In fact, I have received
105 a copy of the same from the Shelby County Zoning Administrator, who prepared the Resolution,
106 and I attach the same hereto as Exhibit D.

107 Q. Does Exhibit D accurately reflect the position of the Shelby County Board as you
108 understand it?

109 A. It does.

110 Q. Have you been approached by any other residents of Rose Township, or Shelby County
111 for that matter, who are directly, or indirectly, affected by the proposed alternate route of the
112 Moultrie County Property Owners?

113 A. Yes, numerous residents of the Township I represent are directly affected by the proposed
114 route of the Moultrie County Property Owners. Many of my constituents have expressed their
115 concerns about the affect the lines will have on their land, the potential decrease in their property
116 values, and the affect the lines may have on tourism and wildlife in Shelby County. Further,
117 residents have expressed concerns that the Moultrie County Property Owners are proposing an
118 alternate route in an area which was not included in the original study area of Ameren, as
119 evidenced by the map prepared by Ameren Transmission Company of Illinois, attached hereto
120 and marked as Exhibit E.

121 Q. Does this conclude your direct testimony?

122 A. It does.

123 Further affiant saith not.

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JOSEPH WOODALL

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SUBSCRIBED AND SWORN to before me this 21st day of March, 2013.



Laura M. Heuerman (Seal)
Notary Public

RESOLUTION

(In Opposition to the Proposed Alternate Ameren Transmission Line)

February 4, 2013

WHEREAS, there is currently pending before the Illinois Commerce Commission, a Petition for a Certificate of Public Convenience and Necessity by Ameren Transmission Company of Illinois to construct high voltage transmission lines across portions of the State of Illinois as found in the Illinois Commerce Commission's docket number 12-0598; and,

WHEREAS, certain interveners have proposed alternate routes to the one preferred and proposed by Ameren Transmission Company of Illinois; and,

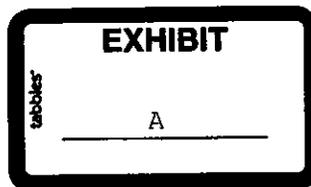
WHEREAS, the Moultrie County Property Owners have proposed a "Potential Route No. 2 (Pana to Kansas)" which, if approved will transverse significant acreage located within Rose Township, Shelby County, Illinois; and,

WHEREAS, the Macon County Property Owners have also proposed the use and/or upgrade of existing lines from Pana to Kansas, which, if approved will transverse significant acreage located within Rose Township, Shelby County, Illinois; and,

WHEREAS, the proposed alternate routes will have a significant impact upon the value of real estate in Rose Township, Shelby County, Illinois, which currently encompasses valuable farm land and scenic wildlife habitat surrounding Lake Shelbyville, a popular tourist attraction for hunting, fishing, boating, and camping; and,

WHEREAS, the initial route proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the people and real estate of Rose Township, Shelby County, Illinois; and,

WHEREAS, the initial route, proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the tourism of Lake Shelbyville and the surrounding area.

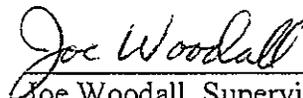


NOW, THEREFORE, be it, and the same is hereby RESOLVED, as follows:

A. The People of the Township of Rose, Shelby County, Illinois, oppose the construction of any transmission line which will transverse the property encompassed within Rose Township, Shelby County, Illinois; and,

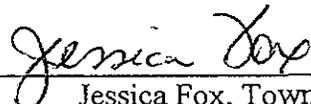
B. The People of the Township of Rose, Shelby County, Illinois, hereby approve of the initial proposed route submitted by Ameren Transmission Company of Illinois in their Petition for a Certificate of Public Convenience and Necessity to the Illinois Commerce Commission.

Dated this 4th day of February, 2013, at Rural Shelbyville, Rose Township, Shelby County, Illinois, pursuant to the affirmative vote of a majority said Township's Supervisor and Trustees.



Joe Woodall, Supervisor
Rose Township,
Shelby County, Illinois

Attest:



Jessica Fox, Town Clerk

RESOLUTION

(In Opposition to the Proposed Alternate Ameren Transmission Line)

February 4, 2013

WHEREAS, there is currently pending before the Illinois Commerce Commission, a Petition for a Certificate of Public Convenience and Necessity by Ameren Transmission Company of Illinois to construct high voltage transmission lines across portions of the State of Illinois as found in the Illinois Commerce Commission's docket number 12-0598; and,

WHEREAS, certain interveners have proposed alternate routes to the one preferred and proposed by Ameren Transmission Company of Illinois; and,

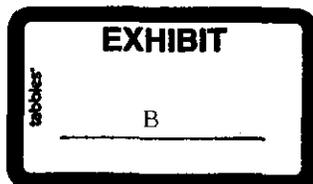
WHEREAS, the Moultrie County Property Owners have proposed a "Potential Route No. 2 (Pana to Kansas)" which, if approved will transverse significant acreage located within Shelbyville Township, Shelby County, Illinois; and,

WHEREAS, the Macon County Property Owners have also proposed the use and/or upgrade of existing lines from Pana to Kansas, which, if approved will transverse significant acreage located within Shelbyville Township, Shelby County, Illinois; and,

WHEREAS, the proposed alternate routes will have a significant impact upon the value of real estate in Shelbyville Township, Shelby County, Illinois, which currently encompasses valuable farm land and scenic wildlife habitat surrounding Lake Shelbyville, a popular tourist attraction for hunting, fishing, boating, and camping; and,

WHEREAS, the initial route proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the people and real estate of Shelbyville Township, Shelby County, Illinois; and,

WHEREAS, the initial route, proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the tourism of Lake Shelbyville and the surrounding area.

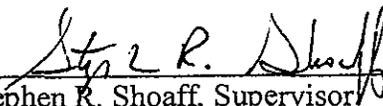


NOW, THEREFORE, be it, and the same is hereby RESOLVED, as follows:

A. The People of the Township of Shelbyville, Shelby County, Illinois, oppose the construction of any transmission line which will transverse the property encompassed within Shelbyville Township, Shelby County, Illinois; and,

B. The People of the Township of Shelbyville, Shelby County, Illinois, hereby approve of the initial proposed route submitted by Ameren Transmission Company of Illinois in their Petition for a Certificate of Public Convenience and Necessity to the Illinois Commerce Commission.

Dated this 4th day of February, 2013, at 7:30 p.m., Shelbyville Township, Shelby County, Illinois, pursuant to the affirmative vote of a majority said Township's Supervisor and Trustees.



Stephen R. Shoaff, Supervisor
Shelbyville Township,
Shelby County, Illinois

Attest:



Ron Koehler, Town Clerk

RESOLUTION

(In Opposition to the Proposed Alternate Ameren Transmission Line)

March 12, 2013

WHEREAS, there is currently pending before the Illinois Commerce Commission, a Petition for a Certificate of Public Convenience and Necessity by Ameren Transmission Company of Illinois to construct high voltage transmission lines across portions of the State of Illinois as found in the Illinois Commerce Commission's docket number 12-0598; and,

WHEREAS, certain interveners have proposed alternate routes to the one preferred and proposed by Ameren Transmission Company of Illinois; and,

WHEREAS, the Moultrie County Property Owners have proposed a "Potential Route No. 2 (Pana to Kansas)" which, if approved will transverse significant acreage located within Ash Grove Township, Shelby County, Illinois; and,

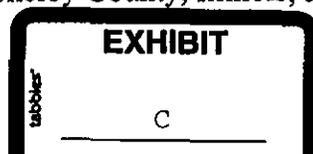
WHEREAS, the Macon County Property Owners have also proposed the use and/or upgrade of existing lines from Pana to Kansas, which, if approved will transverse significant acreage located within Ash Grove Township, Shelby County, Illinois; and,

WHEREAS, the proposed alternate routes will have a significant impact upon the value of real estate in Ash Grove Township, Shelby County, Illinois, which currently encompasses valuable farm land.

WHEREAS, the initial route proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the people and real estate of Ash Grove Township, Shelby County, Illinois; and,

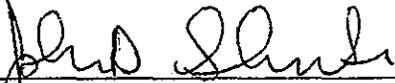
NOW, THEREFORE, be it, and the same is hereby RESOLVED, as follows:

A. The People of the Township of Ash Grove, Shelby County, Illinois, oppose the construction of any transmission line which will transverse the property encompassed within Ash Grove Township, Shelby County, Illinois; and,

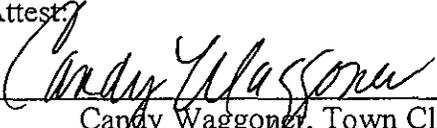


B. The People of the Township of Ash Grove, Shelby County, Illinois, hereby approve of the initial proposed route submitted by Ameren Transmission Company of Illinois in their Petition for a Certificate of Public Convenience and Necessity to the Illinois Commerce Commission.

Dated this 12 day of March, 2013, at 2013, Ash Grove Township, Shelby County, Illinois, pursuant to the affirmative vote of a majority said Township's Supervisor and Trustees.



John D. Shuemaker, Supervisor
Ash Grove Township,
Shelby County, Illinois

Attest:


Candy Waggoner, Town Clerk

Resolution Number:

WHEREAS, there is currently pending before the Illinois Commerce Commission, a Petition for a Certificate of Public Convenience and Necessity by Ameren Transmission Company of Illinois to construct high voltage transmission lines across portions of the State of Illinois as found in the Illinois Commerce Commission's docket number 12-0598; and,

WHEREAS, interveners have proposed alternate routes to the one preferred and proposed by Ameren Transmission Company of Illinois; and,

WHEREAS, the proposed alternate routes will have a significant impact upon the value of real estate in Shelby County, Illinois; and,

WHEREAS, the initial primary route proposed by Ameren Transmission Company of Illinois, will have no adverse impact upon the people and real estate of Shelby County, Illinois; and,

NOW, THEREFORE, BE IT HEREBY RESOLVED by the County Board of Shelby County assembled this 10th day of April, 2013, hereby support the initial primary proposed route submitted by Ameren Transmission Company of Illinois in their Petition for a Certificate of Public Convenience and Necessity to the Illinois Commerce Commission.

Duly adopted and approved this ____ day of _____, _____.

Bruce Cannon, Chairman
County of Shelby, State of Illinois

Attest:

Jessica Fox, Shelby County Clerk

