

**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. }

Case No.: 12-0598

**DIRECT TESTIMONY
OF
KELLY DODSWORTH**

Intervenor MSSCLPG Exhibit 3.0

1 **DIRECT TESTIMONY OF KELLY DODSWORTH**

2 **Q. PLEASE STATE YOUR NAME AND CURRENT RESIDENTIAL ADDRESS.**

3 A. Kelly B. Dodsworth. 4 Valevue Acres Drive, Jacksonville, Illinois 62650.

4 **Q. ARE YOU FAMILIAR WITH THE PROCEEDING IN WHICH YOU ARE**
5 **SUBMITTING THIS TESTIMONY?**

6 A. Yes, I am.

7 **Q. CAN YOU BRIEFLY DESCRIBE YOUR FAMILIARITY WITH THE**
8 **PROCEEDING IN WHICH YOU ARE SUBMITTING THIS TESTIMONY?**

9 A. Yes, I can. Illinois Commerce Commission Docket No.: 12-0598 is a proceeding initiated
10 by Ameren Transmission Company of Illinois (“ATXP”), seeking a Certificate of Public
11 Convenience and Necessity and an Order from the Commission to construct, operate, and
12 maintain a new high voltage electric service line and related facilities in the Illinois counties
13 of Adams, Brown, Cass, Champaign, Christian, Clark, Coles, Edgar, Fulton, Macon,
14 Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott, and Shelby. The original
15 Petition in this matter was filed on November 7, 2012. Because of some amendments to the
16 original Petition, the Administrative Law Judges in this matter ruled that the Petition should
17 be treated as if it were filed in total on January 7, 2013. I am a part of a group of intervenors
18 to this petition, collectively known as the Morgan, Sangamon, and Scott Counties Land
19 Preservation Group. Our group filed a Petition to Intervene in this matter which was granted
20 on December 31, 2012, and an Amended Petition to Intervene which was granted on March
21 1, 2013 and which reflects the composition of our group as it now exists. Our group is
22 represented by counsel and we are participating as an active party to this proceeding. I am

23 filing this testimony as a representative of the group and in accordance with the current Case
24 Management Order.

25 **Q. ARE YOU AUTHORIZED TO TESTIFY ON BEHALF OF, AND AS A**
26 **REPRESENTATIVE OF, THE MORGAN, SANGAMON, AND SCOTT COUNTIES**
27 **LAND PRESERVATION GROUP?**

28 A. Yes, I am.

29 **Q. BRIEFLY DESCRIBE THE COMPOSITION OF THE MORGAN, SANGAMON,**
30 **AND SCOTT COUNTIES LAND PRESERVATION GROUP.**

31 A. The Morgan, Sangamon, and Scott Counties Land Preservation Group is a collective of
32 eighteen (18) intervening interests to this proceeding. Each intervening interest represents
33 more than simply an individual or single parcel of land. We are a collective of what we
34 believe would otherwise represent 18 unique Petitions to Intervene in this proceeding. Our
35 group is made up of individuals, residents, landowners, farmers, and otherwise interested
36 parties, all with an interest in land along and/or upon the general path of the Project which
37 is the subject of this proceeding.

38 **Q. CAN YOU STATE AS SUCCINCTLY AS POSSIBLE WHAT OUTCOME THE**
39 **MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION**
40 **GROUP ADVOCATES IN THIS PROCEEDING?**

41 A. Yes, I can. Quite simply, the Morgan, Sangamon, and Scott Counties Land Preservation
42 Group advocates approval of the Petition as filed with approval given to ATXI's proposed
43 Primary Route. The Morgan, Sangamon, and Scott Counties Land Preservation Group
44 opposes approval of ATXI's proposed Alternate Route.

45 Q. CAN YOU ELABORATE AS TO THE MORGAN, SANGAMON, AND SCOTT
46 COUNTIES LAND PRESERVATION GROUP'S OPPOSITION OF THE
47 PROPOSED ALTERNATE ROUTE?

48 A. Yes, I can. The Morgan, Sangamon, and Scott Counties Land Preservation Group
49 specifically opposes the proposed Alternate Route segment from Meredosia to Pawnee,
50 Illinois. The basis for our opposition is a desire to maintain the integrity of the primarily
51 farmland which comprises the land which is our interest. The proposed Alternate Route
52 would compromise not only the integrity and viability of the land itself, but also jeopardize
53 existing and heavily relied upon farming methods, as well as present environmental and
54 safety concerns to the area. In addition thereto, the land which is the interest of the Morgan,
55 Sangamon, and Scott Counties Land Preservation Group has been found to be quite
56 archaeologically significant. Pottery shards and a Hopewell Indian burial mound have, in
57 fact, been found directly in the path of the proposed Alternate Route. The land itself has
58 been the focus of documentation by the Illinois State Archaeological Survey (Ken
59 Farnsworth, Senior Research Editor). The proposed Alternate Route would be a clear
60 disruption of archaeologically significant land. The land proposed for the Alternate Route
61 is also affected by easements from the Panhandle Eastern Pipeline Company, LP. The
62 Panhandle Eastern Pipeline Company, LP has both a natural gas pipeline and a 12,000 acre
63 natural gas storage area that would be directly affected by the proposed Alternate Route.

64 Q. CAN YOU GIVE A BIT OF YOUR OWN PERSONAL INTEREST AS IT RELATES
65 TO THE PROCEEDING IN WHICH YOU ARE SUBMITTING THIS TESTIMONY
66 AND THE LAND WHICH IS THE BASIS FOR THE INTERVENTION OF THE

67 **MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION**
68 **GROUP?**

69 A. Yes, I can. I own land in both Scott and Morgan Counties, Illinois, which would all be
70 substantially affected by any installation of the proposed Alternate Route. I oppose the
71 proposed Alternate Route for all of the reasons stated above. The line will create woodland
72 fragmentation and destroy existing wildlife corridors. Native hill prairies fragmentation will
73 also occur on my property as the proposed Alternate Route would divide my property. On
74 a personal level, I purchased this land primarily to enjoy the recreational opportunities
75 afforded by such naturally pristine and intact land, activities such as morel mushroom
76 hunting, fishing, swimming, camping, wildlife observation, and deer, turkey, pheasant, quail,
77 dove, and rabbit hunting. Some of the most beautiful wildlife on my land is that surrounding
78 the pond on the ridge overlooking the Sandy Creek Valley. The proposed Alternate Route
79 would cut directly through this naturally occurring beauty.

80 **Q. CAN YOU DESCRIBE THE RELATIONSHIP YOU HAVE TO VARIOUS PARCELS**
81 **OF LAND THAT HAVE BEEN IDENTIFIED AS OF INTEREST TO THE**
82 **MORGAN, SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION**
83 **GROUP?**

84 A. Yes, I can. I own the following parcels: 07-17-300-001, 07-17-300-003, 07-18-400-003, 07-
85 19-200-002, 07-20-100-001, 14-23-400-001, and 14-24-300-006.

86 **Q. CAN YOU IDENTIFY BY NAME(S) AND ASSOCIATED PHYSICAL ADDRESS(ES)**
87 **AND/OR PARCEL NUMBER(S) THE OTHER MEMBERS OF THE MORGAN,**
88 **SANGAMON, AND SCOTT COUNTIES LAND PRESERVATION GROUP?**

89 A. Yes, I can. Paul & Janie Bergschneider: Owners - 846 Franklin-Alexander Road, Franklin,
90 IL 62638; Managers - Parcel Nos.: 15-19-300-009, 15-19-300-005, 15-19-400-001, 15-20-
91 300-011, 15-20-200-005, 15-20-200-003, 15-20-100-002, 15-20-200-006; Tenants - Parcel
92 Nos.: 15-21-100-001, 15-21-300-001, 15-29-200-014, 15-28-300-001, 15-29-400-002, 15-
93 28-100-008, 15-29-200-015, 15-28-100-009. Joseph & Barbara Bergschneider: Owners - 852
94 Franklin-Alexander Road, Franklin, IL 62638, Parcel No.: 15-19-300-008, Owners and
95 Farmers - Parcel Nos.: 15-19-300-009, 15-19-300-005, 15-19-400-001, 15-20-300-011, 15-
96 20-200-005, 15-20-200-003, 15-20-100-002, 15-20-200-006, Tenants - Parcel Nos.: 15-20-
97 200-008, 15-20-200-009, 15-21-100-001, 15-21-300-001, 15-29-200-014, 15-28-300-001,
98 15-29-400-002, 15-28-100-008, 15-29-200-015, 15-28-100-009. Jeff & Peggy
99 Bergschneider: Owners - 831 Dodsworth Rd., Parcel No.: 14-24-300-003, Co-Tenants with
100 Scot Bergschneider - Parcel Nos.: 15-19-100-003, 15-19-200-007, 15-19-200-004. Scot
101 Bergschneider: Owner - 795 Contrary Lane, Parcel Nos.: 15-32-200-022, 15-19-400-011.
102 Curt Willard Dodsworth: Owner - 890 Dodsworth Road, Parcel Nos.: 14-24-300-005, 14-24-
103 200-004. Jan F. Caruthers - Parcel No.: 26-24-100-002. John D. Bergschneider - Parcel
104 Nos.: 15-19-100-003, 15-19-200-007, 19-04-100-002, 19-04-300-005. Scott & Lillian
105 Gordley - Parcel Nos.: 15-30-400-001, 15-30-200-003, 15-30-100-003, 15-30-300-001, 27-
106 09.0-300-010, 27-09.0-400-017, 27-16.0-100-004, 27-16.0-200-001, 27-16.0-200-005, 27-
107 16.0-400-002, 27-16.0-400-003, 27-21.0-100-003, 27-21.0-200-001, 27-16.0-300-005.
108 Robert H. & Marilyn P. Bergschneider - 849 Contrary Lane, Waverly, IL 62692, Owner -
109 Parcel No.: 15-19-200-004. Paula D. Harms - 3N967 Babson Lane, St. Charles, IL 60175 -
110 Parcel Nos.: 15-20-200-008, 15-21-300-001, 15-20-400-006. Thomas J. & Helen R.

111 Bergschneider - Owner - 734 Franklin-Alexander Road, Franklin, IL 62638. Rhea Family
112 Farms LP: Duewer Farm - Parcel Nos.: 15-22-300-002, 15-22-300-002, Burnett Farm -
113 Parcel No.: 19-28-100-007. Robert & Marietta Worrell: Owners, 405 James Creek Lane,
114 Jacksonville, IL, Parcel Nos.: 06-24-290-002, 07-19-100-004, 07-19-100-005, 07-19-200-
115 003, 07-19-200-005, 07-18-400-004, 07-18-400-002, 07-18-400-003, 07-18-300-005, 12-21-
116 200-002, 12-21-400-001, 12-21-100-003. Rita Walsh, Linda Cline.

117 **Q. HAVE YOU HAD AN OPPORTUNITY TO REVIEW THE DIRECT TESTIMONY**
118 **BEING FILED CONTEMPORANEOUSLY WITH YOUR OWN, ON BEHALF OF**
119 **PAUL BERGSCHNEIDER AND STEVE RHEA, AND IF SO, DO YOU HAVE ANY**
120 **PARTICULAR OPINION ABOUT THE SAME?**

121 A. Yes, I have and I do. I have reviewed in detail the Direct Testimony of both Paul
122 Bergschneider and Steve Rhea. In fact, all members of our group have reviewed all of the
123 Direct Testimony that is being filed on March 29, 2013 on behalf of the Morgan, Sangamon,
124 and Scott Counties Land Preservation Group. Our group represents a unified front and we
125 all agree completely with, and support, the Direct Testimony being filed on behalf of our
126 group. In fact, if called to testify, any member of our group could attest to the Direct
127 Testimony as filed or, in the alternative, could testify in substantially the same material
128 fashion.

129 **Q. DOES THIS CONCLUDE YOUR TESTIMONY?**

130 A. Yes, it does.