

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 12-0598

DIRECT TESTIMONY

OF

RICHARD M. EHRHART

SUBMITTED ON BEHALF

OF

INTERVENER

N. KOHL GROCER COMPANY

MARCH 29, 2013

1 **ILLINOIS COMMERCE COMMISSION**

2 **DOCKET NO. 12-0598**

3 **Richard M. Ehrhart**

4 **Submitted on Behalf Of**

5 **Intervener N. Kohl Grocer Company**

6 **I. INTRODUCTION AND WITNESS QUALIFICATIONS**

7 **Q. Please state your name, business address and present position.**

8 **A.** My name is Richard M. Ehrhart, and I am one of the owners and the Treasurer of N.
9 Kohl Grocer Company (d/b/a Kohl Wholesale) (“N. Kohl Grocer” or the “Company”). My
10 business address is 130 Jersey St., Quincy, Illinois, 62301.

11 **Q. Please summarize your educational background and professional experience.**

12 **A.** I attended the University of Missouri pursuing an undergraduate degree in Electrical
13 Engineering, and am a Licensed Master Electrician. I have been employed by N. Kohl
14 Grocer since 1980, and currently serve as the Treasurer.

15 **Q. What are your duties and responsibilities in your present position?**

16 **A.** As an owner and Treasurer of N. Kohl Grocer, my duties include overseeing the
17 financial health and obligations of the Company, as well as overseeing infrastructure
18 improvements and the transportation aspects of our business.

19 **II. PURPOSE AND SCOPE**

20 **Q. Are you familiar with the Project proposed in the Petition filed by Ameren**
21 **Transmission Company of Illinois (“ATXI”) in this proceeding?**

22 **A.** Yes. ATXI is seeking a Certificate of Public Convenience and Necessity and a
23 Section 8-503 Order from the Illinois Commerce Commission (“Commission”) authorizing it

1 to construct, operate, and maintain a 345 kilovolt (“kV”) electric transmission line and
2 related facilities that will span from the Mississippi River just outside of Quincy, Illinois,
3 across the state to the Indiana state line (the “Project”).

4 **Q. What is the purpose of your testimony?**

5 **A.** The purpose of my testimony today is to describe N. Kohl Grocer’s interest and
6 development plans for several parcels of property located in Quincy, Illinois which would be
7 bisected by ATXI’s proposed Primary Route between the Mississippi River and the
8 Southeast Quincy Substation, and to describe the negative economic impacts that such a
9 crossing would have on the business of N. Kohl Grocer and the surrounding Quincy area.
10 Additionally, I will describe in greater detail the alternative route proposals that were
11 submitted by N. Kohl Grocer in its Alternate Route Proposal filed on December 28, 2012, as
12 well as the Errata thereto filed on January 13, 2013.

13 **III. BACKGROUND OF N. KOHL GROCER**

14 **Q. Please briefly describe the business of N. Kohl Grocer.**

15 **A.** N. Kohl Grocer provides wholesale grocery distribution services to restaurants,
16 hotels, supermarkets, schools, hospitals, nursing homes, retail groceries, caterers, taverns,
17 and many other businesses throughout Iowa, Missouri, Illinois, and Indiana. We are a
18 family-owned business that has been located in Quincy, Illinois since our founding in 1873.

19 **Q. Please briefly describe N. Kohl Grocer’s interest in this proceeding.**

20 **A.** N. Kohl Grocer owns two parcels of real estate located at 4611 Gardner Expressway,
21 just south of Quincy , Illinois, that would be bisected by ATXI’s Primary Route, as well as
22 three residential building lots that would also be impacted. We are currently in the process of
23 developing the two non-residential parcels as a new truck maintenance facility and a cutting

1 edge warehouse utilizing advanced wireless order selection technology. To date, the
2 Company has invested significant capital preparing the property for that purpose, which I
3 will detail further below.

4 **Q. Please describe N. Kohl Grocer's plans for this site.**

5 **A.** N. Kohl Grocer has been growing for a number of years. Company warehousing
6 operations are currently located at 3411 Gardener Expressway and at 130 Jersey St. The
7 Jersey St. facility was built in the early 1930s, and has a total of eight loading docks for our
8 100 trucks and the thousands of cases that we transport each day. As we have grown, it has
9 become clear that this facility can no longer efficiently accommodate our needs.
10 Accordingly, we purchased the property referenced in our prior answer with the intention of
11 constructing a new modern facility that could efficiently accommodate our expanding
12 business.

13 **Q. What is it about this site in particular that makes it suitable to N. Kohl Grocer's**
14 **needs?**

15 **A.** N. Kohl Grocer currently operates two facilities in the Quincy area, a dry warehouse
16 located at 130 Jersey Street, and a refrigerated warehouse located at 3411 Gardner
17 Expressway. As we have outgrown our Jersey Street dry warehouse, we plan to construct a
18 new purpose-built dry warehouse facility on the site that ATXI proposes to cross. It is
19 crucial that the two Gardner Expressway locations be in close proximity to one another since
20 we load product from the refrigerated warehouse onto a truck at that location and then shuttle
21 over to our other location to load product from our dry warehouse onto the same truck. We
22 do this every day for 100 trucks. Finding and purchasing the 4611 Gardner Expressway
23 location was crucial to our growth and development because the proximity of that location to

1 our other Gardner Expressway location will allow for much greater efficiencies in our
2 operations. Without these planned efficiencies, the Company will be at a significant
3 competitive disadvantage.

4 **Q. Has N. Kohl Grocer spent any money preparing this site for its intended**
5 **purpose?**

6 **A.** Yes. We have completed a significant amount of project development work,
7 including conducting an archaeological site survey, soil testing, environmental studies, and
8 hiring various site plan consultants to ensure the property is suitable for our proposed
9 facilities. Additionally, Ameren has furnished and installed the underground primary electric
10 service and junction boxes needed to service the new facility, at a cost of \$25,323.31 paid by
11 N. Kohl Grocer. We also have coordinated with the various other utilities to extend natural
12 gas, water, fire sprinkler water, cable TV, telephone and fiber to the site. All told, to date, we
13 have invested approximately \$80,000 in the development of the site for our purposes, not
14 including the approximately \$800,000 that we invested in the purchase of the parcels.

15 **Q. If N. Kohl Grocer is able to construct its new facility as planned, would there be**
16 **any benefits to the surrounding community?**

17 **A.** Yes. We currently have approximately 325 employees, with an average 2012 annual
18 wage of approximately \$42,300.00. This ranks us as the 13th largest non-governmental
19 employer in Adams County, Illinois. When we construct our new facility, we expect to
20 employ approximately 100 employees at that location alone. Additionally, we anticipate that
21 we will maintain the steady growth that we have experienced recently, and plan to add at
22 least 300 new employees over the next ten years.

1 **Q. If ATXI is authorized to proceed with its plan to construct a transmission line**
2 **across its Primary Route, would N. Kohl Grocer be able to operate its new facility on**
3 **the site?**

4 A. No. As you can see on the map attached as Exhibit A, ATXI's Primary Route bisects
5 our property diagonally in half. It would be impossible to operate the 150,000 square foot
6 warehouse facility that we require with a 345 kV transmission line running directly through
7 the heart of the property.

8 **Q. What is N. Kohl Grocer's schedule for beginning construction on this site?**

9 A. As described above, N. Kohl Grocer's growth is hindered by our current facility, and
10 thus it is vital that we relocate in the near future. Accordingly, we plan to begin construction
11 at the site that ATXI now proposes to cross as soon as possible during the 2013 construction
12 season.

13 **Q. Aside from the logistical concerns regarding a high-voltage transmission line**
14 **splitting your planned development parcel, do you have any other concerns regarding**
15 **the construction of an electric transmission line near the property?**

16 A. Yes. We have significant concerns about the impact of the line's electromagnetic
17 field (EMF) on our operations. In addition to potential deterioration of the cellular and
18 wireless data reception in our facility or in close proximity to our facility, we use a pretty
19 elaborate wireless infrastructure in our facility for the computers on our forklifts and for the
20 devices that each of our order pickers wears to receive picking instructions and confirm the
21 picking of the correct product for the orders. Interference with this network would severely
22 impact the accuracy of our orders and the efficiency of our workers.

1 **Q. Aside from the site at issue, are there other available parcels in the region that**
2 **provide a suitable alternative?**

3 **A.** No. Unfortunately, there are not many sites in Quincy that can serve a facility of the
4 size that we are planning to construct and have adequate additional property for expansion in
5 close proximity with our other existing facility. The only other logistically viable sites are
6 located within a floodplain to the south and west. If we were to locate our facility within that
7 floodplain, we could not obtain property insurance through a third-party insurer for the
8 improvement and the Company is not big enough to self-insure. Accordingly, alternative
9 sites are not an option, at least on the Illinois side of the Mississippi River.

10 **Q. Has N. Kohl Grocer ever expressed its concern about the location of the**
11 **proposed route to ATXI?**

12 **A.** Yes. I personally attended the public meetings held by ATXI relating to the Project
13 on May 23rd, 2012 and September 24, 2012. During the May 23rd, 2012 meeting ATXI only
14 provided a map depicting a 20 mile wide corridor which gave no indication of where the
15 transmission line would ultimately be located. It was at the September 24, 2012 meeting that
16 ATXI finally disclosed the proposed path for the transmission line. At that meeting, I told
17 Rick Trelz and Donell Murphy, both of whom were present, that N. Kohl Grocer opposed the
18 ATXI Primary Route and I asked them to change the Primary Route so that it did not impact
19 our development property.

20 **Q. Did you attempt to express N. Kohl Grocer's concerns subsequent to the public**
21 **meetings?**

22 **A.** Yes. I attempted to schedule meetings with representatives of ATXI to discuss the
23 negative impacts of the proposed Primary Route on N. Kohl Grocer's business, but was

1 unsuccessful. I then asked the Great River Economic Development Foundation (“GREDF”),
2 as a member of that organization, to try and facilitate a meeting with ATXI (or, more
3 accurately, Ameren Services). We were able to secure a meeting with David Burbridge of
4 Ameren Services and Lauren Zielke of ERM on October 25th, 2012, and I again voiced my
5 objections to the proposed Primary Route and explained in great detail the potential impacts
6 it would have on N. Kohl Grocer’s development plans. Ultimately, I was disappointed to see
7 that ATXI made no revisions to its proposed Primary Route in its November 7th 2012 filing.

8 **Q. Have any governmental entities recognized that this particular area is important**
9 **for business development?**

10 A. Yes. Our facility is located within an area that has been designated the “South
11 Quincy Development District.” The City of Quincy, Adams County, and the State of Illinois
12 have invested substantial public funds to improve the water, sewer, and road infrastructure in
13 the South Quincy Development District in an attempt to support economic development
14 projects in that area. To date, these expenditures have been in excess of twelve million
15 dollars (\$12,000,000).

16 **Q. Has the Adams County Board taken an official position regarding ATXI’s**
17 **Primary Route crossing through the South Quincy Development District?**

18 A. Yes. On November 13th, 2012, the Adams County Board passed a resolution
19 opposing ATXI’s Primary Route and supporting an alternative route proposed by the Great
20 River Economic Development Foundation (“GREDF”). A copy of that resolution is attached
21 hereto as Exhibit B. I will provide additional detail about this GREDF route below, as it is
22 the second of the three alternative routes that N. Kohl Grocer has proposed for Commission
23 consideration in this proceeding.

1 **Q. Has the Quincy City Council taken an official position regarding ATXI's**
2 **Primary Route crossing through the South Quincy Development District?**

3 **A.** Yes. On January 7, 2013, the Quincy City Council approved a resolution opposing
4 the ATXI Primary Route and supporting the alternative route proposed by GREDF. A copy
5 of that resolution is attached hereto as Exhibit C.

6 **Q. Have any other governmental entities taken an official position regarding**
7 **ATXI's Primary Route crossing through this area?**

8 **A.** Yes. The Mill Creek Water District currently holds an easement through N. Kohl
9 Grocer's parcels for a 14-inch water transmission line, and they have expressed concern
10 about potential problems that the ATXI transmission line could cause for the maintenance of
11 that water line. Additionally, they have concerns about the impact of the Primary Route
12 passing through the South Quincy Development District, as it will interfere with efforts to
13 promote that area for new or expanding companies. A copy of a letter from the Mill Creek
14 Water District detailing these concerns is attached hereto as Exhibit D.

15 **IV. Alternative Route Proposals**

16 **Q. Has N. Kohl Grocer submitted any alternative route proposals for the**
17 **Commission to consider?**

18 **A.** Yes. As discussed above, N. Kohl Grocer opposes ATXI's Primary Route because it
19 bisects our property. As alternatives to the ATXI Primary Route, we submitted three route
20 proposals in our Alternate Route Proposal filed on December 28, 2012, as well as the Errata
21 thereto filed on January 13, 2013. Also, as described below, in addition to the routes set
22 forth in our Alternate Route Proposal filing, the Company also supports one of the routes
23 proposed in this docket by Matt Holtmeyer Construction, Inc.

1 **Q. Please provide additional detail about N. Kohl Grocer’s primary proposed route.**

2 **A.** N. Kohl Grocer proposes that the Commission consider adopting a route that it has
3 prepared in conjunction with the Great River Economic Development Foundation
4 (“GREDF”). For the purposes of this testimony, I will refer to this route proposal as the
5 “NKG Primary Route.” An Exhibit depicting this route was attached to N. Kohl Grocer’s
6 Alternate Route Proposal filed on December 28, 2012 as Ex. A, and is also attached hereto as
7 Exhibit E. The NKG Primary Route follows the ATXI Alternate Route for all but about a
8 9400 foot segment from the centerline of the Mississippi River to the point where it connects
9 to the ATXI Alternate Route and follows the ATXI Alternate Route to the SE Quincy
10 Substation Site. Additionally, the 9400 foot portion of the NKG Primary Route that is
11 diverges from ATXI’s Alternate Route runs on a path that would have similar characteristics
12 to the ATXI Alternate Route.

13 **Q. Please provide additional detail about GREDF.**

14 **A.** GREDF is an economic development organization that has been in existence for
15 nearly thirty years in the Quincy area, and N. Kohl Grocer has been a member of the
16 organization since 2007. GREDF works in conjunction with the City of Quincy and the
17 Adams County Board to promote the retention, expansion and attraction of business in the
18 area. A letter from GREDF’s Interim President, Phil Conover, describing their interest in
19 this proceeding, is attached hereto as Exhibit F.

20 **Q. Has GREDF been involved in any discussion with ATXI regarding the proposed**
21 **transmission project?**

22 **A.** Yes. As you can see in GREDF’s letter, GREDF representatives attended all six of
23 the informational meetings held in Quincy in the months leading up to this docket. When the

1 details about ATXI's preferred route were finally disclosed during the sixth and final
2 meeting, GREDF discovered that ATXI was proposing to pass through the South Quincy
3 Development District and the site of N. Kohl Grocer's new facility. In an effort to prevent
4 this, prior to the ATXI's initiating this docket GREDF proposed the same alternate route that
5 N. Kohl Grocer is now proposing. As described by ATXI witness Donell Murphy on page
6 12 of her Direct Testimony, ATXI rejected that proposal because 1.5 miles of the route
7 would be located near five homes, and would require a crossing of the Mississippi River
8 other than at ATXI's proposed crossing. However, in response to Data Request No. NKG
9 2.10, ATXI explains that it bases its assumption that there are occupied homes in the area on
10 interpretations of aerial photographs and a tour of the area that was conducted by members of
11 GREDF. NKG disagrees with ATXI's analysis. There appear to be only 3 landowners that
12 would potentially be affected by this route, all of which have been notified and have not
13 intervened in this proceeding.

14 **Q. Does N. Kohl Grocer support any other modifications to the ATXI Alternate**
15 **Route?**

16 **A.** Yes. With the exception of the 9400 feet beginning at the Mississippi River, which
17 resolves N. Kohl Grocer's objections, the NKG Primary Route is identical to the ATXI
18 Alternate Route. However, one of the other parties to this proceeding, Matt Holtmeyer
19 Construction, Inc. ("Holtmeyer Construction") filed an Alternate Route Proposal on March
20 1st, 2013, that indicates that they object to later portions of the ATXI Alternate Route. To
21 address their objections, Holtmeyer Construction has proposed a deviation from the Alternate
22 Route depicted on its Exhibits C1 and C2 to their March 1st, 2013 filing (the "Holtmeyer
23 Route"). After reviewing this proposal, as long as the first 9400 feet of the NKG Primary

1 Route remain unchanged, N. Kohl Grocer would be willing to support a modification to the
2 NKG Primary Route to make it consistent with the Holtmeyer Route.

3 **Q. Does N. Kohl Grocer believe that the NKG Primary Route provides a better**
4 **alternative for the Commission in this proceeding?**

5 **A.** Yes. The NKG Primary Route avoids any interference the site N. Kohl Grocer's new
6 facility, and more broadly the South Quincy Development District as a whole. Additionally,
7 I believe that the NKG Primary Route accomplishes ATXI's goal of maximizing straight-line
8 runs for the transmission line, as it eliminates two ninety-degree turns, and it also passes
9 through areas that should minimize the amount of vegetation management and tree-trimming
10 that would be required for ATXI. Additionally, if the Commission decides to alter the NKG
11 Primary Route to make it consistent with the Holtmeyer Route, it would potentially resolve
12 the objections of two parties to this proceeding and avoid severe economic harm to the
13 region.

14 **Q. Please provide additional detail about N. Kohl Grocer's second proposed route.**

15 **A.** In the event that the Commission does not approve the NKG Primary Route described
16 above, N. Kohl Grocer next would propose that the Commission consider adopting a route
17 that runs along existing Ameren Illinois / CIPS transmission right-of-ways in the area.
18 Specifically, N. Kohl Grocer asks the Commission to consider the route depicted on the map
19 attached hereto as Exhibit G, which has been prepared by N. Kohl Grocer. This proposed
20 route runs along existing Ameren Illinois/CIPS Transmission Line No. 1 right-of-way which
21 currently carries an existing 161/138 kilovolt transmission line. The existing Transmission
22 Line No. 1 the 161/138 kilovolt line has been in service about 30-40 years and is installed on
23 wooden pole structures. By installing replacement double circuit towers (as depicted on

1 ATXI Ex. 7.2) and obtaining a 132 foot width right-of-way, ATXI should be able to
2 incorporate the new 345 kilovolt line along the route from the Mississippi River to the site of
3 the SE Quincy Substation. Presumably, Ameren Illinois (CIPS) could let ATXI use one of
4 these two existing rights-of-way for a negotiated lease amount.

5 **Q. Does N. Kohl Grocer believe that these routes are preferable to ATXI's**
6 **proposed Primary Route?**

7 **A.** Yes. In addition to the fact that these proposed routes would lessen the impact on the
8 South Quincy Development District and avoid the site of N. Kohl Grocer's new facility,
9 N. Kohl Grocer believes that either of these two routes should present a lower cost and
10 shorter route between the Mississippi River crossing and the SE Quincy Substation than
11 ATXI's Primary Route.

12 **Q. Please describe the existing right-of-ways that would be needed for these routes.**

13 **A.** It is difficult for N. Kohl Grocer to provide much analysis regarding the right-of-ways
14 that currently exist, as ATXI has objected to our data requests for plat information that would
15 show the actual available right-of-way they control along this path, as well as our requests for
16 a concise legal description of the vacant right-of-ways that would allow us to determine their
17 widths. However, presumably these right-of-ways are set forth in the legal descriptions that
18 encumber all the real estate along the route in question, and the existing transmission lines
19 along those routes are obviously visible. Thus, it is probably safe to assume that the
20 existence of prior right-of-ways held by ATXI or Ameren Illinois are known to the property-
21 owners along those routes.

1 **Q. Are there any additional advantages for these routes that should be taken into**
2 **consideration?**

3 **A.** Yes. First, N. Kohl Grocer assumes that new double circuit towers would be safer and
4 more secure against wind loads than the existing wooden poles. Second, either of these routes
5 would require the clearance of an existing right-of-way path so that annual maintenance
6 expense should be less. Third, the existing right-of-way paths and transmission lines have
7 been in existence for 30-40 years. Modification of these lines from a wooden pole to double
8 circuit monopole towers should reduce the impact on the public. Finally, having two circuits
9 on this route with the very substantial foundations and heavy duty steel structures proposed
10 should reduce concerns for wind damage outages and falling tree or falling limb damage
11 outages, thus increasing reliability.

12 **Q. Please describe N. Kohl's Grocer's position regarding the ATXI Alternate**
13 **Route.**

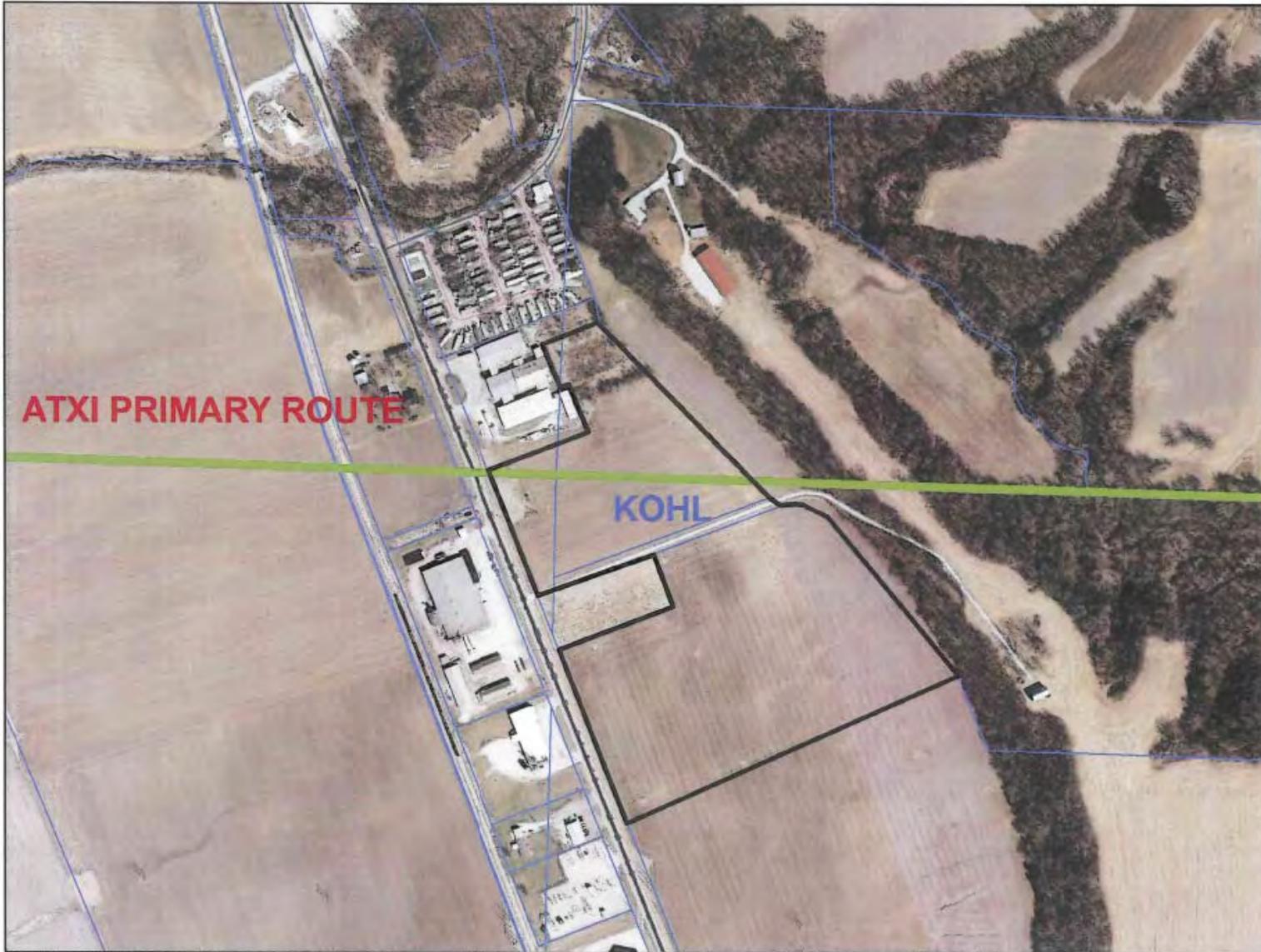
14 **A.** In the event that the Commission rejects the other routes that have been proposed by
15 N. Kohl Grocer in this proceeding, N. Kohl Grocer would ask that the Commission approve
16 the Alternate Route put forth by ATXI in this proceeding as depicted on the maps in ATXI's
17 Ex 4.2 Part 1, page 27 of 27. ATXI's Alternate Route avoids the N. Kohl Grocer property.

18 **VI. Conclusion**

19 **Q. Does this conclude your direct testimony?**

20 **A.** Yes, it does.

EXHIBIT A



This map is made available as a public service. This is not a legal land survey and is for reference purposes only. Adams County is not responsible for any inaccuracies herein contained.

EXHIBIT B

RESOLUTION

TO THE HONORABLE COUNTY BOARD

Ladies and Gentlemen:

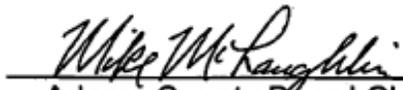
WHEREAS, Ameren Transmission Company of Illinois (ATXI) plans to construct a new 345 kilovolt transmission line known as the Illinois Rivers Project that will interconnect Missouri, Illinois and Indiana which will cross Adams County; and

WHEREAS, ATXI's proposed primary route on map sectors R0, R1 and R2 could hinder future development in the South Quincy Industrial Area; and

WHEREAS, the Great River Economic Development Foundation (GREDF) has proposed an alternative route which would be less intrusive on the valuable South Quincy Industrial Area.

NOW, THEREFORE, BE IT RESOLVED, that the County Board of Adams County hereby opposes ATXI's proposed primary route on map sectors R0, R1 and R2 in the South Quincy Industrial Area and supports an alternative route proposed by GREDF.

Dated this 13th day of November, 2012



Adams County Board Chairman

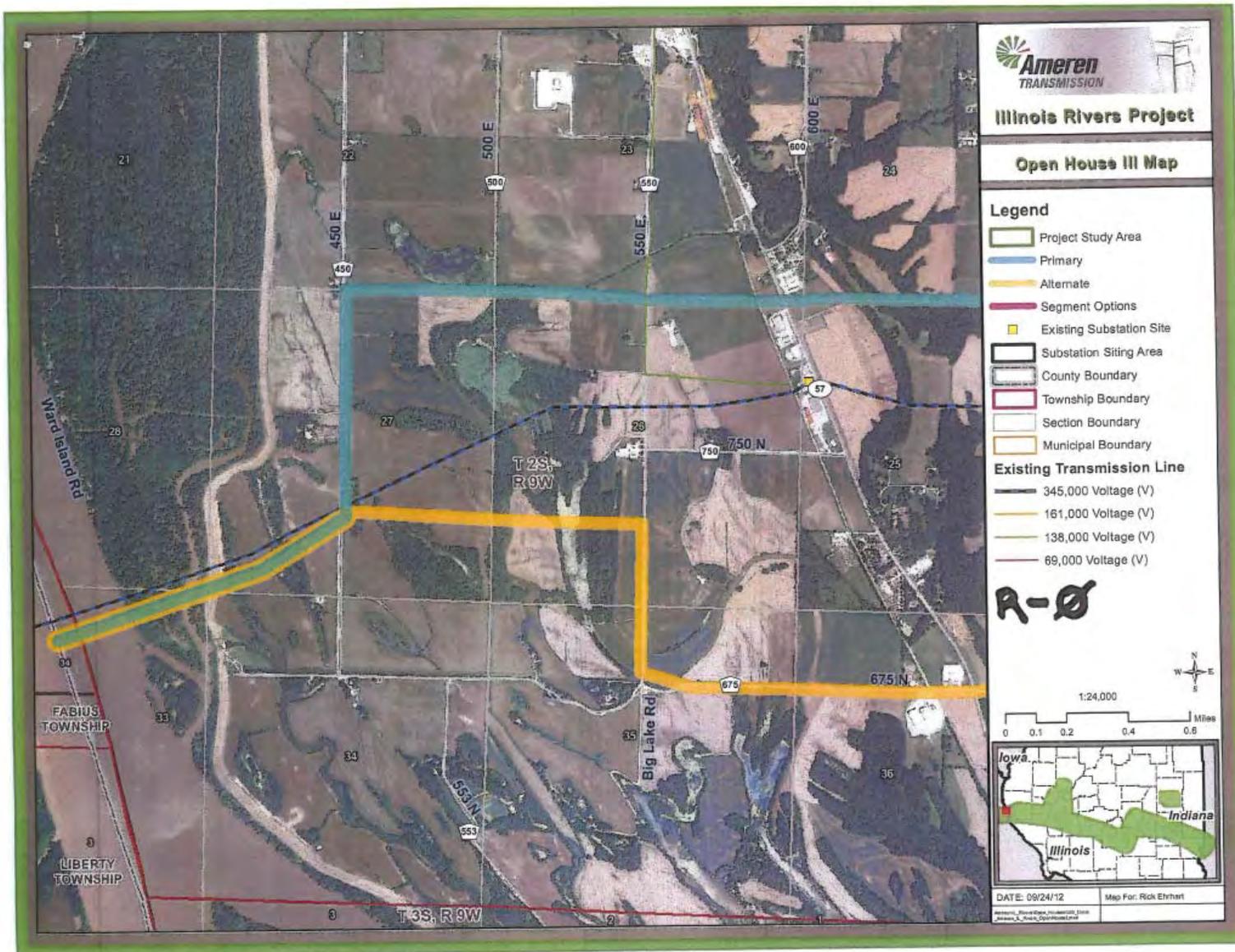


Adams County Clerk

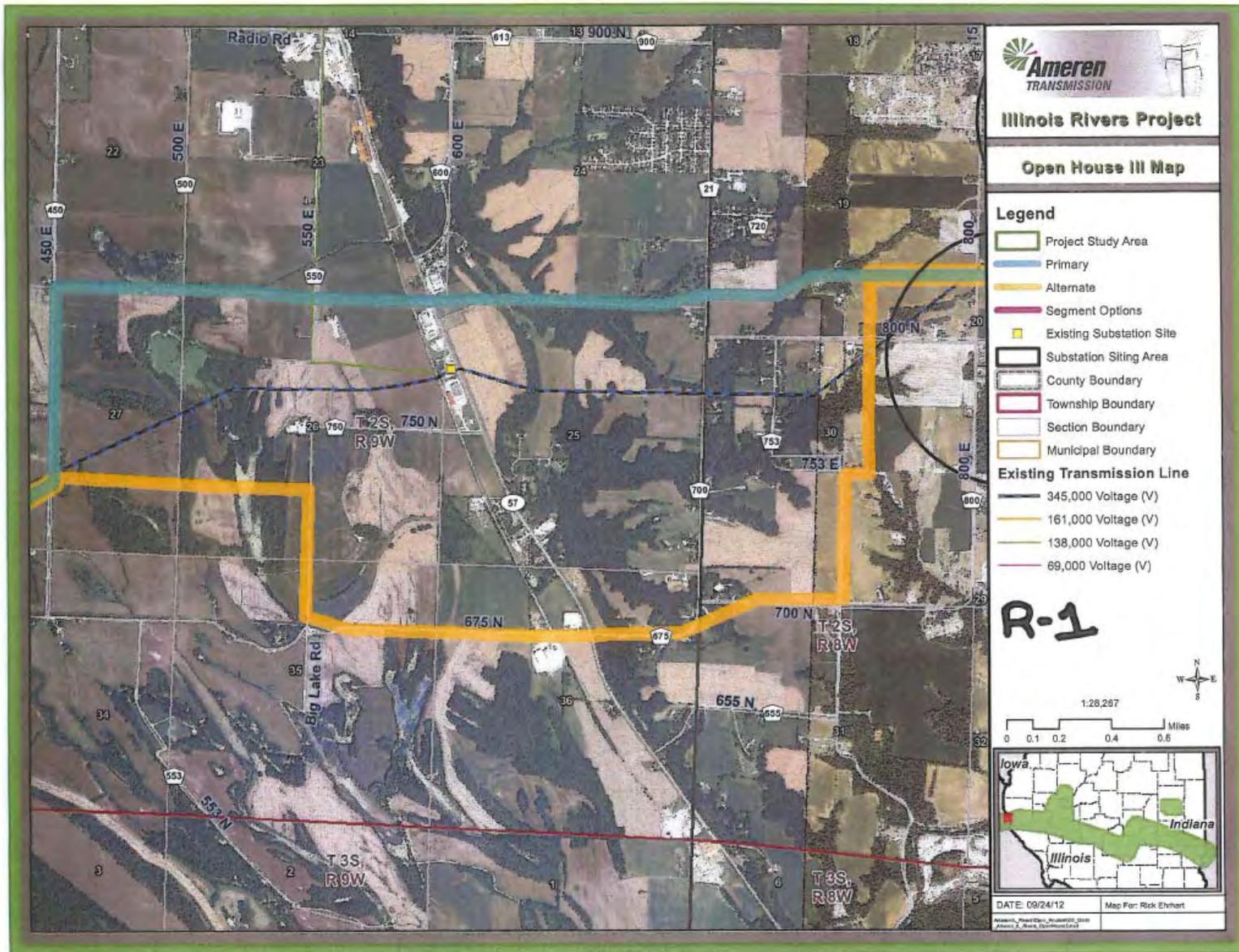


-H1-

Ex. R0



Ex. R1



Ex. R2

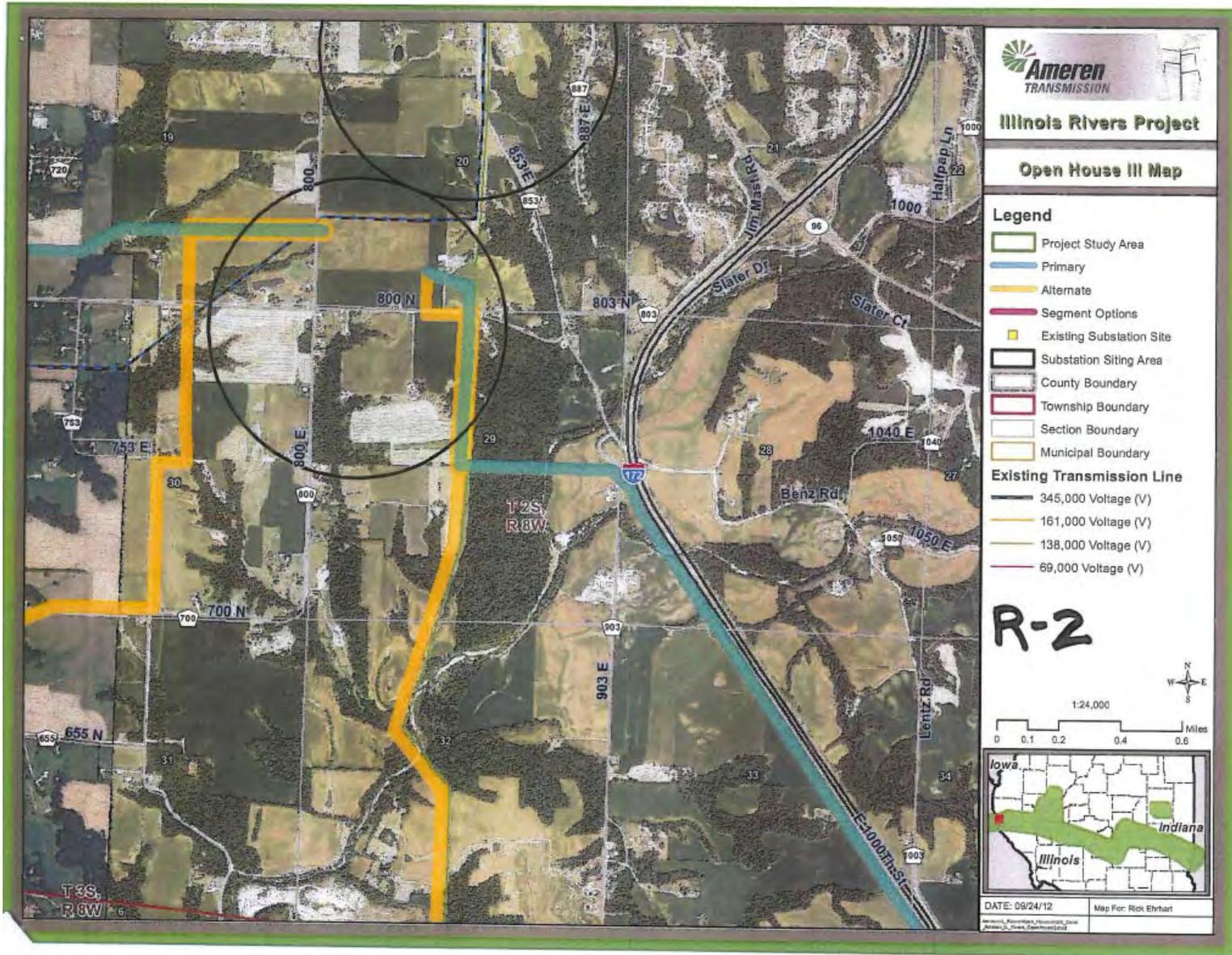


EXHIBIT C

RESOLUTION AMEREN TRANSMISSION LINE

WHEREAS, Ameren Transmission Company of Illinois (ATXI) plans to construct a new 345 kilovolt transmission line know as the Illinois Rivers Project that will interconnect Missouri, Illinois and Indiana which will cross Adams County; and

WHEREAS, ATXI's proposed primary route on map sectors R0, R1 and R2 could hinder future development in the South Quincy Industrial Area; and

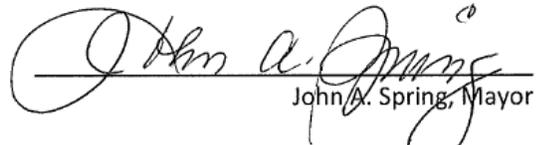
WHEREAS, The City of Quincy has invested public infrastructure in the South Quincy Development Area that would be negatively impacted by ATXI's proposed primary route; and

WHEREAS, the Great River Economic Development Foundation (GREDF) has proposed an alternative route which would be less intrusive on the valuable South Quincy Industrial Area.

NOW, THEREFORE, BE IT RESOLVED, that the City of Quincy hereby opposes ATXI's proposed primary route on map sectors R0, R1 and R2 in the South Quincy Industrial Area and supports an alternative route proposed by GREDF.

This Resolution shall be in full force and effect from and after its passage, as provided by law.

SIGNED:



John A. Spring, Mayor

ATTEST:



Jenny Hayden, City Clerk

STATE OF ILLINOIS
County of Adams,
City of Quincy

} ss. I, VIRGINIA HAYDEN, City Clerk and Ex-Officio Town Clerk

of the City and Town of Quincy, County of Adams, State of Illinois do hereby certify that the foregoing and hereto attached contains a full, true and correct copy of RESOLUTION

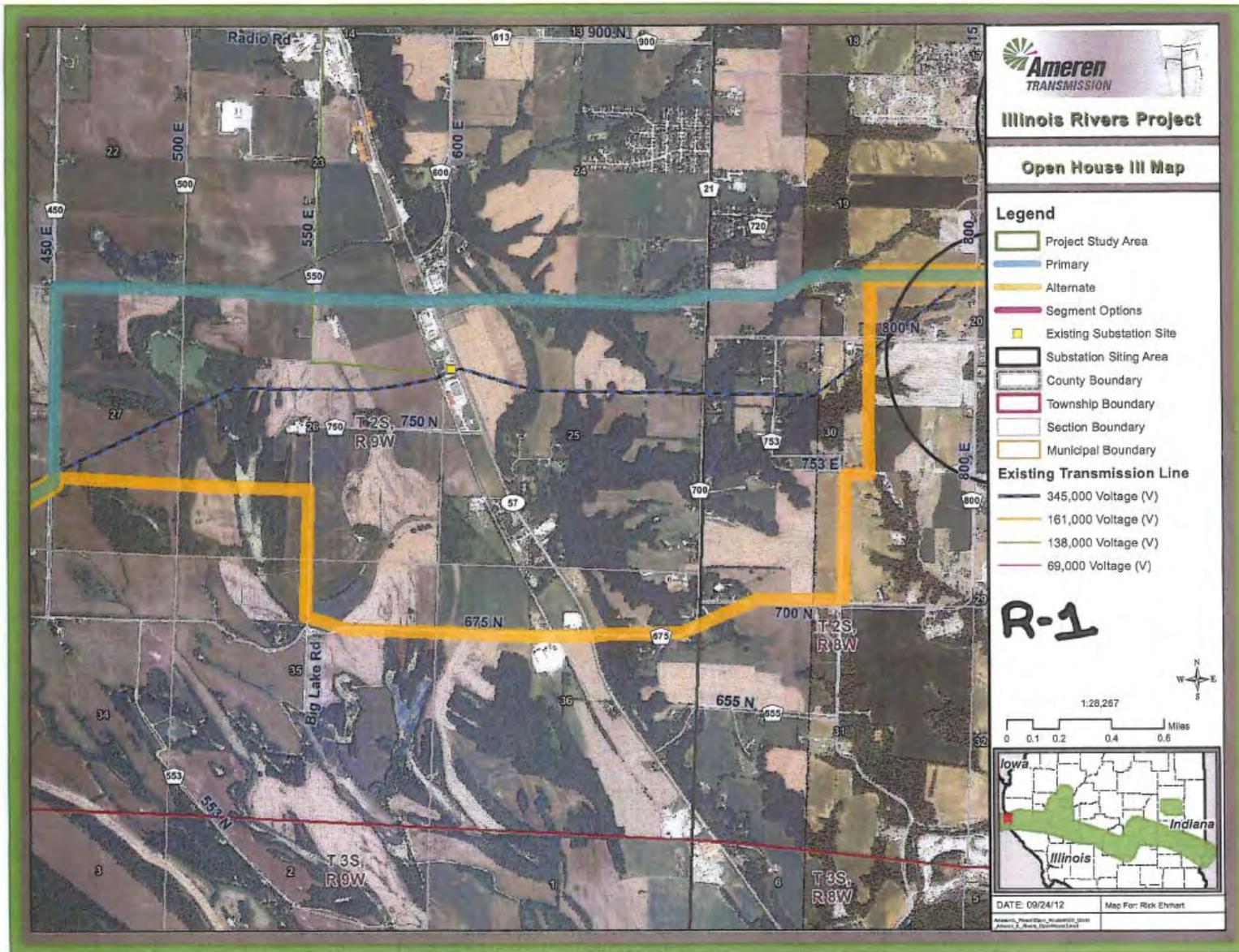
RESOLUTION ON AMEREN TRANSMISSION LINE PRIMARY ROUTE ON MAP SECTORS R0, R1 AND R2 IN THE SOUTH QUINCY INDUSTRIAL AREA IS OPPOSED BY CITY OF QUINCY AND SUPPORTS AN ALTERNATIVE ROUTE PROPOSED BY GREDF.

as the same appears of Record and on the files in my office remaining.

IN WITNESS WHEREOF, I have hereto set my hand and affixed the corporate seal of the said City of Quincy, Adams County, Illinois, this 11th day of January, 2013.

Virginia Hayden City Clerk
Per _____ Deputy

Ex. R1



Ex. R2

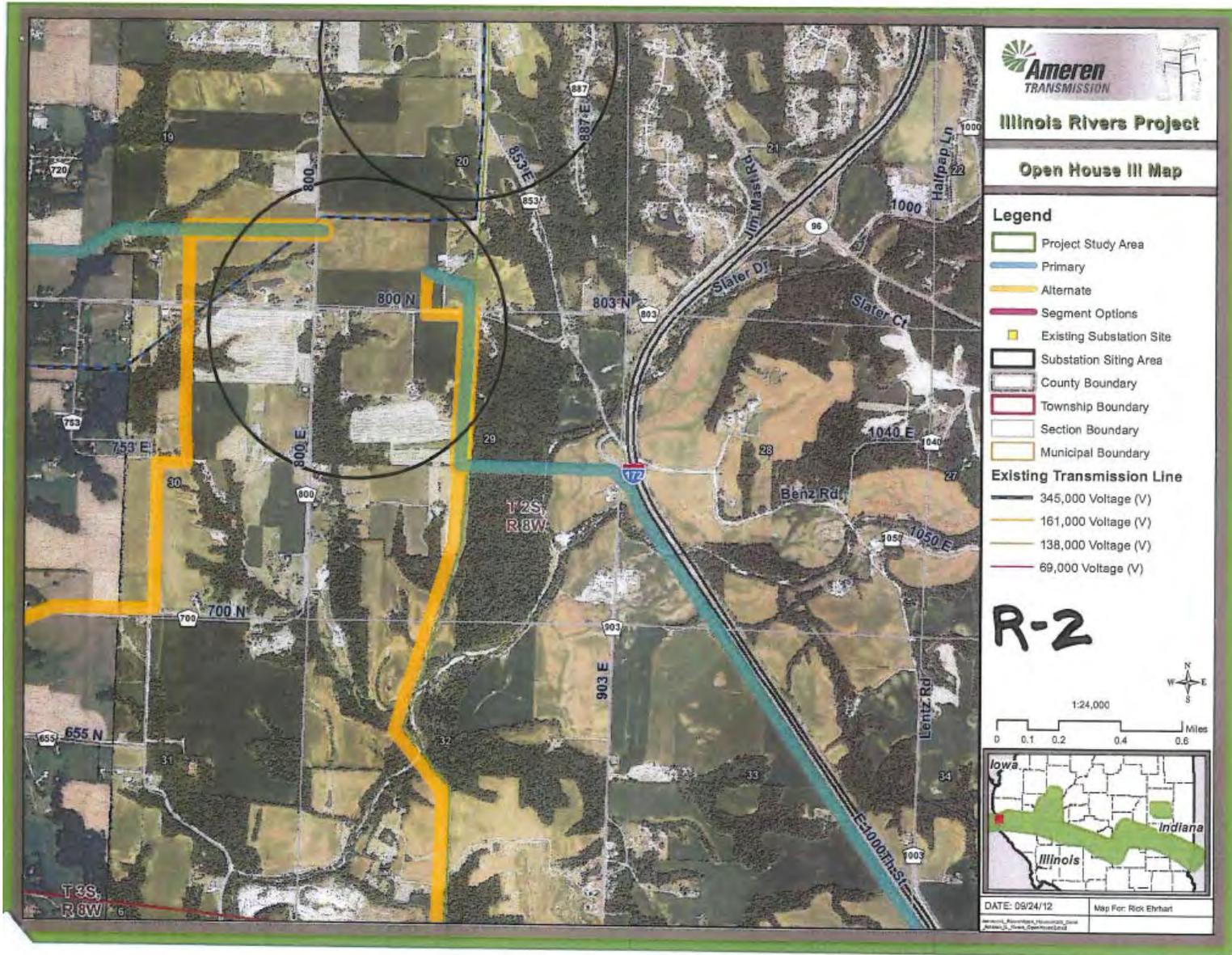


EXHIBIT D



Mill Creek Water

PHONE 217-224-9343

6415 HICKORY GROVE NTH

EMAIL milcrk2@adams.net

QUINCY ILLINOIS 62305-8776

January 17, 2013

**Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701**

**Re: Docket 12-0598
ATXI345 KV Line**

Attention: Administrative Law Judges, John D. Albers & Stephen Yoder:

Mill Creek Water District located at 6415 Hickory Grove North, Quincy, Illinois 62305 in Adams County, Illinois is involved in the distribution of potable water to 2190 services located adjacent to the south and east sides of the City of Quincy, Illinois.

The availability of sufficient and reliable electricity just like potable water is important to the citizens of the area. We are supportive of the general concept of additional transmission capacity in the Quincy area. We do however have some concerns about the specific location of the primary route near Quincy. One of our concerns is the primary route 345 line runs on the section line between sections 24 & 25 in the west part of Melrose Township, Adams County, Illinois T2S-R8W. Mill Creek Water District recently completed a 14 inch water transmission line in the exact same location, which is the only connection for finished water for our 2190 customers. This will cause problems during construction of the 345 line and in the future when maintenance may be needed to be performed by Ameren Transmission and /or Mill Creek Water District to their facilities.

Mill Creek would recommend the Illinois Commission to adopt the alternate route of the GREDF preferred route from the Mississippi River to the Southeast Quincy Substation. The alternate route will also impact Mill Creek's Distribution system but not to the magnitude of the primary route.

Another concern is the Ameren Transmission 345 line primary route crosses through the South of Quincy Development Area which in several cases compromises the site for industrial development? The City of Quincy and Adams County have expended significant monies in infrastructure development to make this area attractive for new or expanding companies. These jobs could provide the income necessary to support themselves and yes pay for their water service.

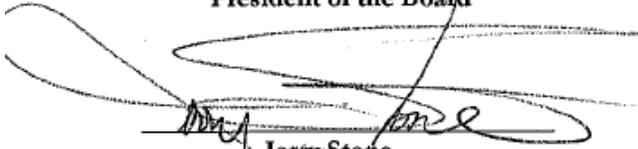
We do not envy the arduous task facing you at this point but ask for your sagacious attention and consideration for selection of the alternate or GREDF route from the Mississippi River crossing to the Southeast Quincy substation site.

Sincerely,

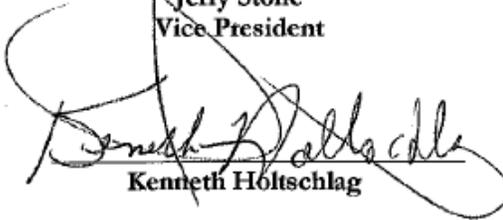
Mill Creek Water District Board of Directors



Gerald E. Christner
President of the Board



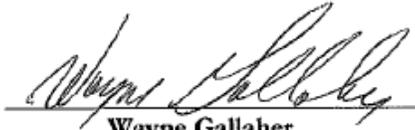
Jerry Stone
Vice President



Kenneth Höltschlag



Robert Scott



Wayne Gallaher

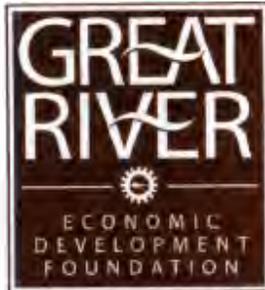


Mark Gochl



Richard Wentura

EXHIBIT F



January 18, 2013

Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

Re: Docket 12-0598
ATXI 345 KV Line

Attention: Administrative Law Judges, John D. Albers & Stephen Yoder:

Great River Economic Development Foundation (GREDF) is the organization, in conjunction with the City of Quincy and Adams County Board, to promote the retention, expansion and attraction of industry and business in the area, thereby aiding the quality of life for the citizens. GREDF has been in existence for over 27 years and is well regarded and respected in the area and throughout the tri-state region.

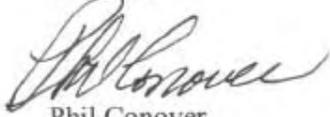
GREDF was originally excited to hear about Ameren Transmission Company of Illinois (ATXI) plans to bring additional electric transmission capacity to our area. GREDF representatives attended all six (6) of the informational meetings held in Quincy. During the first five (5) meetings no detail was shown of the exact location of 345KV line from the Mississippi River Crossing to the southeast Quincy substation site. At the sixth and last meeting detail was presented and GREDF representatives were stunned by what they saw. The primary route selected would severely compromise projects in progress such as the Kohl Grocer expansion and impede future development of the area southwest of Quincy known as the South Quincy Development District. The City of Quincy and County of Adams have invested significant monies (approximately \$12,000,000) to make the specific area attractive for industrial development, as well as extending Enterprise Zone designation into the area. Given the short time frame of the last meeting we had no immediate response to an alternate route. We did suggest later to ATXI an alternate which their consultant did not like.

The alternate proposed by GREDF would cross the Mississippi River slightly south of the primary route proposed by ATXI and proceed in an almost straight line east for approximately one and a half miles where it would then follow the ATXI alternate route to the southeast Quincy substation site.

The GREDF preferred route should be less costly to construct and maintain as it eliminates two 90 degree turns and has less tree clearing and trimming needed. (See attachment A & B)

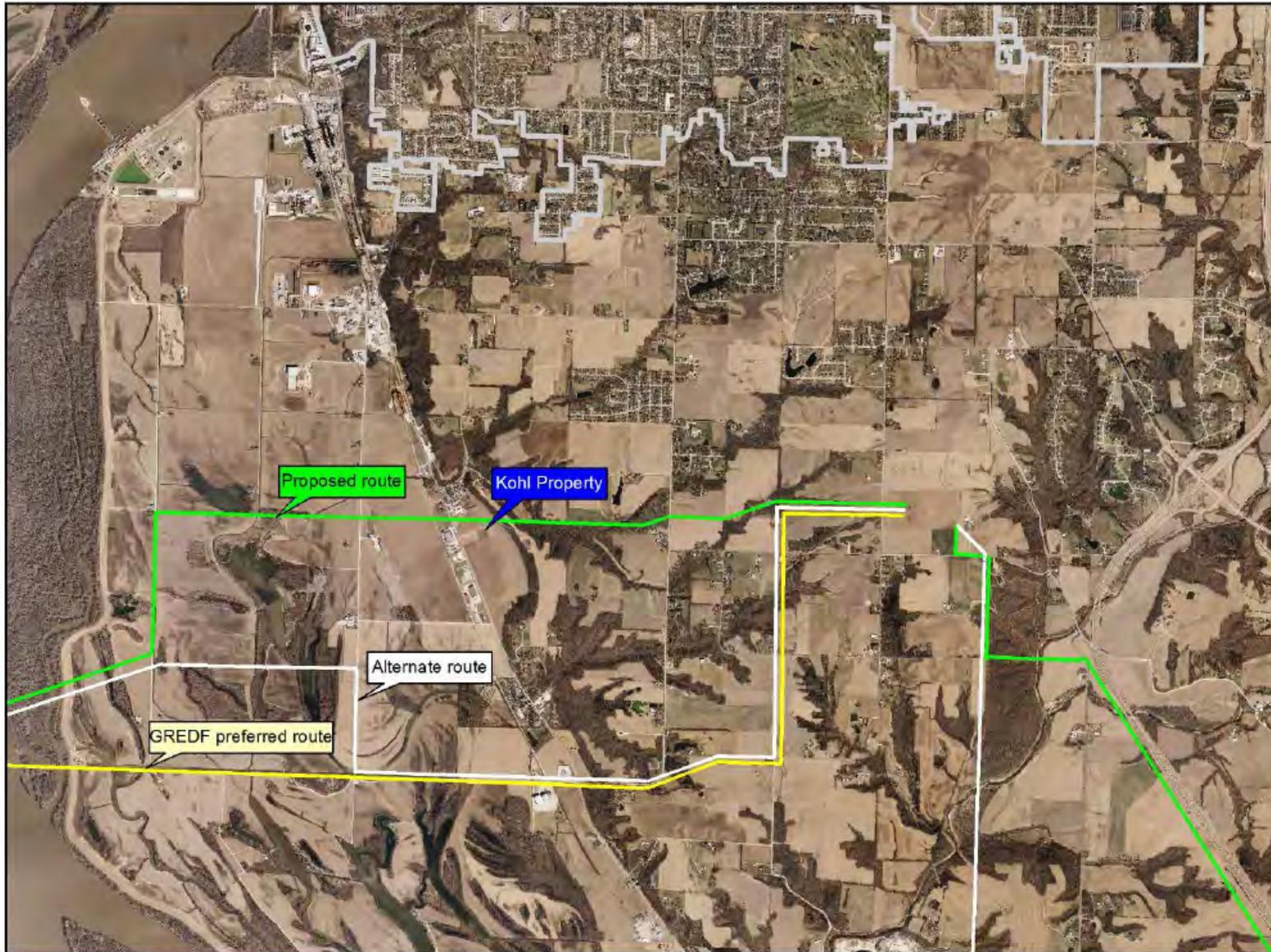
GREDF would ask the Illinois Commerce Commission and the ALJ hearing officers and staff to seriously consider the one and a half mile change in the route to remove the primary route proposed 345KV line from present and future development of the South Quincy Development area.

Sincerely,

A handwritten signature in black ink, appearing to read "Phil Conover". The signature is fluid and cursive, with a large initial "P" and "C".

Phil Conover
Interim GREDF President

Attachment A



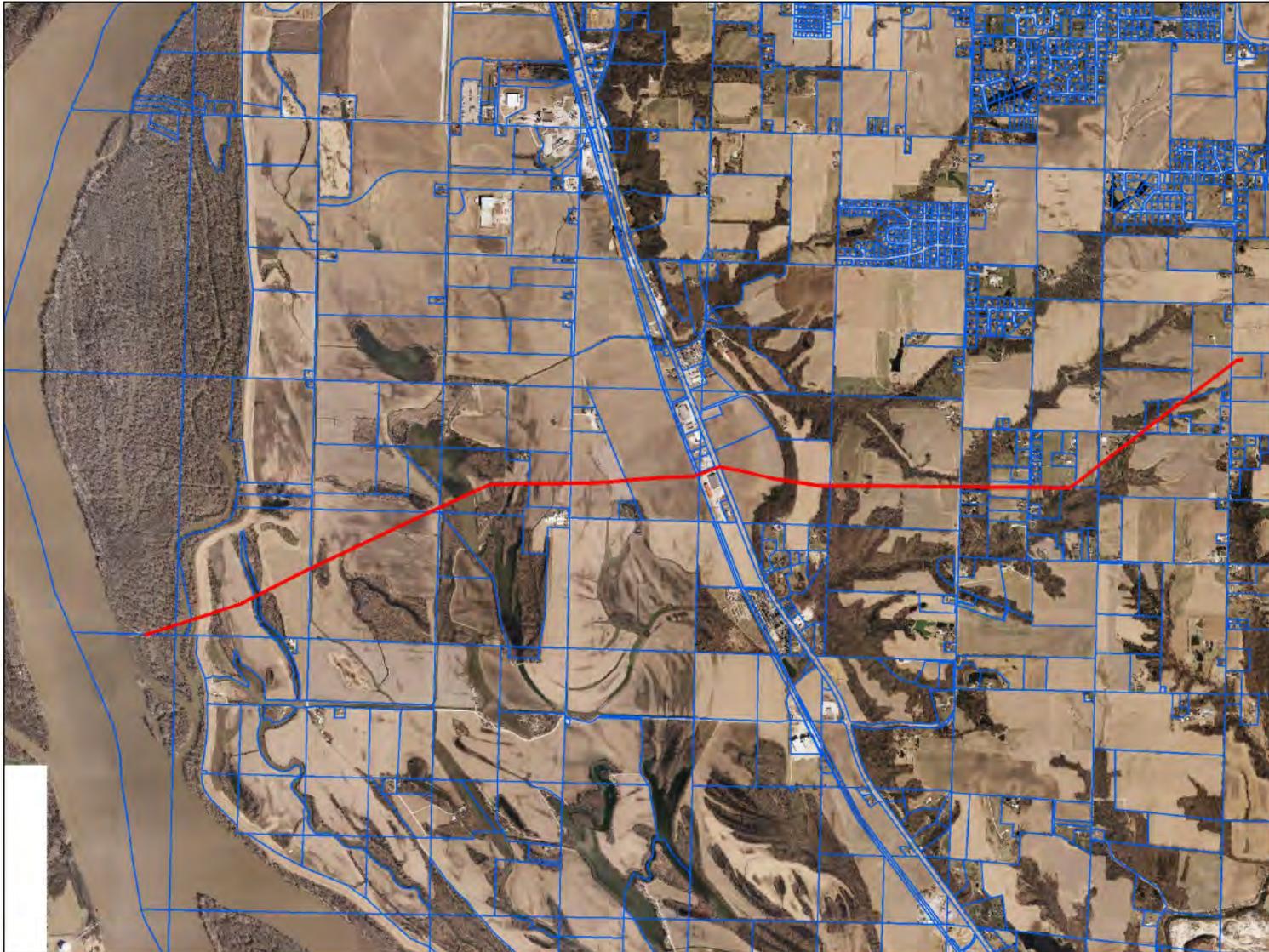
This map is made available as a public service. This is not a legal land survey and is for reference purposes only. Adams County is not responsible for any inaccuracies herein contained.

Attachment B



This map is made available as a public service. This is not a legal land survey and is for reference purposes only. Adams County is not responsible for any inaccuracies herein contained.

EXHIBIT G



**State of Illinois
Illinois Commerce Commission**

AMEREN TRANSMISSION COMPANY OF)
ILLINOIS)
)
Petition for 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) Docket No. 12-0598
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.)

NOTICE OF FILING

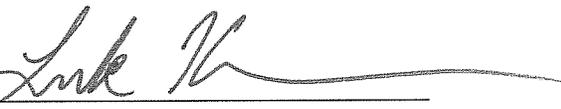
To: All Persons on the Attached Service List

Please take notice that on March 29, 2013, I, Luke A. Hagedorn, attorney for N. Kohl Grocer Company, filed an original of the Direct Testimony of Richard M. Ehrhart with the Chief Clerk's Office of the Illinois Commerce Commission via the e-docket system.

Dated: March 29, 2013

Respectfully submitted

N. KOHL GROCER COMPANY

By: 

One of its Attorneys

Luke A. Hagedorn
Polsinelli Shughart PC
6201 College Boulevard, Suite 500
Overland Park, KS 66211
LHagedorn@Polsinelli.com
(913)234-7416

CERTIFICATE OF SERVICE

I, Luke A. Hagedorn, certify that I served this Notice of Filing, and its accompanying Direct Testimony of Richard M. Ehrhart, to each person named on the Illinois Commerce Commission's service list, on March 29, 2013, by electronic mail.

A handwritten signature in black ink, appearing to read "Luke A. Hagedorn", is written over a horizontal line.

Luke A. Hagedorn
Polsinelli Shughart PC
6201 College Boulevard, Suite 500
Overland Park, KS 66211
LHagedorn@Polsinelli.com
(913)234-7416