

Ameren Transmission Company of Illinois'
Response to Gregory and Theresa Pearce Data Requests
Docket No. 12-0598

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 Various Counties in the State of Illinois.

Data Request Response Date: 3/27/2013

Pearce 1.01

Please explain ATXI ethics policy regarding its dealings with landowners affected by its new transmission line projects. Please include the specific wording of the policy and where the policy can be accessed.

RESPONSE

Prepared By: Rick D. Trelz
Title: Real Estate Supervisor
Phone Number: (217) 562-1463

ATXI objects to this request as vague and overly broad. The term "ethics policy" is broad and undefined. ATXI further objects to this request to the extent it seeks information which is not relevant and which is not likely to lead to the discovery of admissible evidence. Subject to and without waiving these objections, ATXI responds as follows.

ATXI will comply with Part 300 of the Commission Rules of Practice and Procedure, "Guidelines for Land and Right-of-Way Acquisitions" (83 Ill. Adm. Code Part 300), as discussed on pages 4-5 of the direct testimony of Mr. Rick Trelz (ATXI Ex. 5.0). Further, any ATXI interaction with landowners is driven by Ameren's corporate values: integrity, respect, accountability, stewardship, teamwork and commitment to excellence. Ameren's corporate values are listed on its website at www.ameren.com.

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Data Request Response Date: 3/27/2013

Pearce 1.02

Please cite the direct benefits *specifically* to Gregory and Theresa Pearce, landowners in Sangamon County, of the project before, during or after the project, as researched by ATXI.

RESPONSE

Prepared By: Dennis D. Kramer
Title: Director, Transmission Policy & Planning
Phone Number: 314 554 2238

ATXI objects to this request as argumentative and speculative, and as vague, overly broad and unduly burdensome. The term "benefits" is broad and undefined. Further, this request is limited in neither time nor scope. Subject to and without waiving that objection, ATXI responds as follows.

Please see the discussion of the reliability and operational benefits of the Project in the direct testimonies of ATXI witnesses Dennis Kramer (ATXI Ex. 2.0) and Jeffrey V. Hackman (ATXI Ex. 3.0 (2d Rev.)). Please see the attached Illinois Rivers Transmission Project Fact Sheet.

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Pearce 1.03

Please cite the harms, dangers, detriments, and negative effects of the project to Gregory and Theresa Pearce's health and property value, as researched by ATXI. If no research was done to consider the Pearce's *specifically*, please explain why not.

RESPONSE

Objection. The data request is argumentative and makes assumptions which are not the proper subject of discovery. Further it is vague and uncertain in terms of what is meant or intended by harms, dangers, detriments, and negative effects or health and property value.

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Pearce 1.04

Will the home of Gregory and Theresa Pearce, landowners in Sangamon County Illinois, be powered by the project? Will Gregory and Theresa Pearce benefit directly from new electrical service? If not, please identify which counties will directly benefit from the project and would utilize the electricity.

RESPONSE

Prepared By: Jeffrey V. Hackman
Title: Director, Transmission Operations
Phone Number: 314-554-2839

It is very likely that electrical energy that “flows” on the Illinois Rivers Project will “power” the Pearce home, but obviously not by direct connection. The nature of the interconnected bulk electric system is somewhat like an interstate highway system. Interstate I-55 “serves” the Pearce home, although it is not their driveway. UPS delivering a package will use I-55, then one or more state highways, county roads, and ultimately the Pearce drive to serve their home. Illinois Rivers will benefit all the counties through which it passes, including Sangamon, and others as well through the benefits stated in the Direct Testimony of Ms. Borkowski in ATXI Exhibit 1.0.

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Data Request Response Date: 3/27/2013

Pearce 1.05

Pease produce all documents, studies, and consultations that Ameren reviewed to determine how the proximity of the transmission line would affect the property value of Gregory and Theresa Pearce's home *specifically, and to what extent the project would affect its value.*

RESPONSE

ATXI objects to this request as argumentative and speculative, and as vague, overly broad and unduly burdensome. ATXI further objects to this request because it asks for information which is not relevant and which is not likely to lead to the discovery of admissible evidence.

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Pearce 1.06

How much profit or money did ATXI earn in 2012? Please cite the source of your data. Please cite the ATXI employee who provides this response's name and his or her qualifications and position at ATXI.

RESPONSE

ATXI objects to this request as vague, argumentative and speculative. ATXI further objects to this request because it asks for information which is not relevant and which is not likely to lead to the discovery of admissible evidence.

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Data Request Response Date: 3/27/2013

Pearce 1.07

How much more money or profit does ATXI project to earn the first year the transmission line is operational than it made in 2012? Please cite the person's name, and his or her position and qualifications in ATXI who provides this information. Please state the projected increase in a dollar amount.

RESPONSE

ATXI objects to this request as vague, argumentative and speculative. ATXI further objects to this request because it asks for information which is not relevant and which is not likely to lead to the discovery of admissible evidence.

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Data Request Response Date: 3/27/2013

Pearce 1.08

List ten instances in detail, in which the Illinois Commerce Commission has ordered ATXI to move transmission lines away from an Illinois rural residence that is further than a half mile away from its nearest neighbor and not located in a subdivision. If this information can not be provided, please explain in detail why.

RESPONSE

Prepared By: Dennis D. Kramer
Title: Director, Transmission Policy & Planning
Phone Number: 314-554-2238

ATXI objects to this request because it is vague, speculative and asks for information which is not relevant and which is not likely to lead to the discovery of admissible evidence. Subject to and without waiving that objection, ATXI responds as follows.

The Illinois Commerce Commission has not expressly ordered ATXI or its predecessor to specifically move a proposed transmission line route away from an Illinois rural residence that is further than a half mile away from its nearest neighbor and not located in a subdivision.

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Data Request Response Date: 3/27/2013

Pearce 1.09

Is there a limit to the increase in kilovolts that the 345 kv transmission line could be upgraded to in the future? Please explain *in detail*.

RESPONSE

Prepared By: Dennis D. Kramer
Title: Director, Transmission Policy & Planning
Phone Number: 314 554 2238

ATXI objects to this request as seeking information not relevant or material to this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. ATXI further objects to this request as calling for speculation with respect to the electric planning needs in Illinois. Subject to and without waiving that objection, ATXI responds as follows.

At present there are no plans to increase the nominal operating voltage of the transmission line.

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Data Request Response Date: 3/27/2013

Pearce 1.10

Is there a possibility in the future of double circuiting the 345kv transmission line. Please explain *in detail*.

RESPONSE

Prepared By: Jeffrey V. Hackman
Title: Director, Transmission Operations
Phone Number: 314-554-2839

ATXI objects to this request as speculative, vague, overly broad and unduly burdensome. Subject to and without waiving that objection, ATXI responds as follows.

There are no plans to double circuit the transmission line. However, significant large load additions, changing load patterns, a significant change in the national energy mix, and other factors all could create conditions where a second line would be needed. However, based on reasonable "sensitivity cases" and projected planning, this is not expected.

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Data Request Response Date: 3/27/2013

Pearce 1.11

In the future, is there a possibility of a third, fourth, etc. transmission line being built in Sangamon County being discussed by Ameren? Please explain in detail all future plans of new transmission lines or upgrades of transmission lines in Sangamon County. If any information is omitted, please explain in detail why.

RESPONSE

ATXI objects to this request as vague, overly broad and unduly burdensome. ATXI objects to this request as seeking information not relevant or material to this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. ATXI further objects to this request as calling for speculation with respect to the electric planning needs in Sangamon County.

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Pearce 1.12

If the future plans referenced in 1.10 are in the affirmative, would those transmission lines in Sangamon County be dual circuited, or would they be in a new right of way? Please explain all plans.

RESPONSE

ATXI objects to this request as seeking information not relevant or material to this proceeding, and not reasonably calculated to lead to the discovery of admissible evidence. ATXI further objects to this request as calling for speculation with respect to the electric planning needs in Sangamon County.

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Pearce 1.13

Why are minimum distances from schools, hospitals and day care centers required of ATXI when planning transmission lines, but it is then permissible for those same school students to spend more hours in proximity to the transmission line if it is within 150 feet of their bedroom window in their home?

RESPONSE

Prepared By: Donell Murphy

Title: Partner, Environmental Resources Management

Phone Number: 847-258-8912

ATXI objects to this request in that the request is vague and uncertain. Further the data request is argumentative and not the proper subject of discovery. Further the data request seeks information that is not relevant, material, or likely to lead to the discovery of admissible evidence. Without waiving objection ATXI identified each of these features, in addition to existing residential areas, as sensitivities (please see ATXI Exhibit 4.4). The results of ATXI's public process suggested that of these features, existing residential areas were considered a higher sensitivity (please see generally ATXI Exhibits 4.3 and 4.4). ATXI has identified that no structures or buildings are allowed within ATXI's right-of-way.