

**BEFORE THE ILLINOIS COMMERCE COMMISSION  
STATE OF ILLINOIS**

**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 )**

**Docket No. 12-0598**

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**REBUTTAL TESTIMONY OF K. DOUGLAS BLODGETT**

Director of River Conservation for  
The Nature Conservancy, Illinois Chapter

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On behalf of The Nature Conservancy

**THE NATURE CONSERVANCY**

**April 12, 2013**

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**REBUTTAL TESTIMONY OF K. DOUGLAS BLODGETT**

1 **Q. Please state your name and business address with The Nature Conservancy.**

2 A. My name is K. Douglas Blodgett. My business address is 11304 N. Prairie Road,  
3 Lewistown, Illinois 61542, which is The Nature Conservancy’s Illinois River  
4 Program Office.  
5

6 **Q. Did you submit Direct Testimony in this proceeding?**

7 A. Yes. On March 29, 2013, I submitted Direct Testimony (TNC Ex. 1.0-1.1) on  
8 behalf of The Nature Conservancy. Direct Testimony on behalf of The Nature  
9 Conservancy was also submitted on March 29, 2013 by Dr. Jeff Walk (TNC Ex.  
10 2.0-2.5) and Professor Michael Patrick Ward (TNC 3.0-3.1).

11

12 **Q. What is the purpose of your Rebuttal Testimony?**

13 A. The purpose of my Rebuttal Testimony is threefold:

14 First, and most importantly, this testimony confirms that The Nature Conservancy  
15 has entered into a Stipulation with Ameren Transmission Company of Illinois  
16 ("Ameren" or "ATXI") regarding a preferred route for that portion of ATXI's  
17 proposed line extending from Meredosia, Illinois, north into southern Schuyler  
18 County, Illinois (a portion of the Meredosia to Ipava, Illinois, segment as  
19 originally identified in Exhibit A (part 2 of 5), p. 3 of Ameren's Petition).

20 Second, this testimony acknowledges the Illinois Commerce Commission  
21 ("Commission") Staff testimony that supported The Nature Conservancy's  
22 proposed Alternative Route.

23 Finally, this testimony indicates the extent of any opposition to The Nature  
24 Conservancy's Direct Testimony filed on March 29, 2013.

25

26 **Q. Please explain the Stipulation that The Nature Conservancy has entered into  
27 with Ameren.**

28 A. The Nature Conservancy and Ameren have entered into a Stipulation regarding a  
29 preferred route for that portion of ATXI's proposed line extending from  
30 Meredosia, Illinois, north into southern Schuyler County, Illinois. That  
31 Stipulation was filed by Ameren on e-Docket on April 11, 2013, together with a  
32 Motion to File and Admit the Stipulation. Attached to this testimony as TNC Ex.

33 4.1 is a copy of the Stipulation, together with Exhibit A thereto (a map detailing  
34 the route which is the subject of the Stipulation).

35

36 **Q. What is the purpose of the Stipulation?**

37 A. As the Commission is aware, The Nature Conservancy has expressed concerns  
38 regarding potential substantial negative impacts posed by the construction of a  
39 transmission line by Ameren. In particular, The Nature Conservancy has  
40 identified concerns about impacts to the Spunky Bottoms Preserve located in  
41 Brown County. (*See generally* TNC Ex. 1.0 (TNC witness Mr. Blodgett); TNC  
42 Ex. 2.0 (TNC witness Dr. Walk); TNC Ex. 3.0 (TNC witness Professor Ward).)  
43 In addition, The Nature Conservancy has identified concerns about impacts to a  
44 wetland mitigation bank site owned by the Illinois Department of Transportation  
45 ("IDOT") and upland bluff habitat located in Brown and Schuyler Counties. (*See*  
46 *id.*) In an effort to address these issues, The Nature Conservancy engaged in  
47 productive negotiations with Ameren. The result of those negotiations is the  
48 Stipulation, pursuant to which The Nature Conservancy and Ameren have agreed  
49 on a preferred "Stipulated Route" from Meredosia to southern Schuyler County.  
50 As shown in Exhibit A to the Stipulation, the Stipulated Route avoids both the  
51 Spunky Bottoms Preserve and the IDOT wetland mitigation bank site.  
52 Recognizing the contingencies of litigation, and in an effort to narrow the  
53 contested issues in this proceeding, The Nature Conservancy acknowledges that  
54 there is support in the record for the adoption of the Stipulated Route and that the  
55 Stipulated Route is preferred over the other routes that have been suggested in this

56 proceeding. Accordingly, while preserving its rights in accordance with the terms  
57 of the Stipulation, The Nature Conservancy withdraws support for other routes  
58 and supports the Stipulated Route.

59

60 **Q. Did the Direct Testimony of Staff or any other party comment upon The**  
61 **Nature Conservancy's original position?**

62 A. Yes. Staff witness Greg Rockrohr, Case Manager in the Commission's Energy  
63 Engineering Program, Safety and Reliability Division, testified that based on the  
64 information he reviewed and primary cost drivers with which he is familiar, The  
65 Nature Conservancy's "Alternate 1" would be the best route choice for the  
66 Meredosia to Ipava segment. As noted above, in an attempt to narrow issues in  
67 this case, The Nature Conservancy has entered into a Stipulation with Ameren  
68 under which the Stipulated Route is The Nature Conservancy's preferred route.  
69 However, The Nature Conservancy wishes to express its appreciation for the work  
70 and consideration by Mr. Rockrohr and Staff in formulating the analysis offered  
71 by Mr. Rockrohr on Staff's behalf.

72

73 **Q. Did the Direct Testimony of Staff or any other party take issue with The**  
74 **Nature Conservancy's original position?**

75 A. With one exception noted herein, it does not appear that any testimony submitted  
76 on March 29, 2013 is adverse to The Nature Conservancy's position in this matter  
77 or its Direct Testimony. The one exception appears to be the testimony on behalf

78 of the Korsmeyer Family Trust, which advocates in favor of Ameren's Primary  
79 Route in Schuyler County where the Korsmeyer Family Trust property is located.

80

81 **Q. What is your response to the testimony of the Korsmeyer Family Trust?**

82 A. Again, The Nature Conservancy has entered into a Stipulation with Ameren under  
83 which it supports the Stipulated Route. However, pursuant to paragraph 9 of the  
84 Stipulation and to preserve its rights, The Nature Conservancy reiterates that it  
85 strongly opposes the Ameren Primary Route generally for the reasons that were  
86 comprehensively explained in my Direct Testimony and the Direct Testimony of  
87 Dr. Walk and Professor Ward. The Nature Conservancy's opposition is based  
88 largely on the anticipated adverse effects of the Primary Route on the  
89 Conservancy's Spunky Bottoms Preserve and adjacent bluff habitats in Brown  
90 County, Illinois. It does not appear that the testimony on behalf of the Korsmeyer  
91 Family Trust takes into account the environmental impacts of Ameren's Primary  
92 Route.,

93 **Q. What is The Nature Conservancy's current position in this proceeding?**

94 A. Pursuant to the Stipulation between The Nature Conservancy and Ameren, The  
95 Nature Conservancy believes it has resolved concerns regarding the route for that  
96 portion of Ameren's proposed Transmission Line extending from Meredosia north  
97 into southern Schuyler County. In an effort to resolve certain concerns raised by  
98 the Parties, The Nature Conservancy withdraws its support for its previously  
99 identified Alternatives to this segment, and requests that the Commission approve  
100 the Stipulated Route.

101

102 **Q. Does this conclude your Rebuttal Testimony?**

103 **A. Yes.**