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.	)	Docket No. 12-0598

RESPONSE OF RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS TO THE MOTION TO STRIKE CERTAIN INTERVENORS' UNTIMELY ALTERNATE ROUTE PROPOSALS

Intervenor, RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS ("RCECCC"), by its attorney, William F. Moran, III, would request that an order be entered denying the Motion to Strike Certain Intervenors' Untimely Alternate Route Proposals filed in this cause by Ameren Transmission Company of Illinois ("ATXI"), at least as said motion relates to the Direct Testimony of George Orin on behalf of RCECCC. In support, RCECCC states as follows:

1. On March 14, 2013, RCECCC, was granted leave to intervene in this cause.

2. On Wednesday, March 27, 2013, RCECCC filed the direct testimony of one of its members, George Orin, in support of its positions.[1]

3. On April 11, 2013, ATXI filed a motion to strike a portion of Mr. Orin's testimony, claiming that the same was an untimely proposal of an alternate route.

[1] At present, a motion for leave to e-Docket this testimony *nunc pro tunc* to March 27, 2013, is pending in this docket. ATXI does not contest this motion, so RCECCC is filing this response with the expectation that its previous motion will be allowed and the testimony filed.

4. The testimony of Mr. Orin at issue provides support for the use of the right-of-ways of the existing power lines which exit the Kansas Substation heading in an easterly direction. One of the existing power lines heads almost due east from the substation, while the other first moves east, then south, and then southeast. These right-of-ways are depicted by green lines shown on a chart which is included in Paragraph 4A of Mr. Orin's testimony. If ATXI's proposed new power line were to follow either of these right-of-ways, the lines would not cross the properties owned by the members of RCECCC.

5. The testimony of Mr. Orin asserts that these existing power lines were constructed and are being operated by "Ameren." As such, the intention was not to suggest alternative routes to the proposed power line, but to make the point to the Commission that the "least cost" alternative would be for ATXI to follow its existing lines. While Mr. Orin's testimony does not cite to any studies or professional analysis in support of the suggested proposition, the same is based upon common sense and practicality, as more fully described in his testimony.

6. Further, while not directly stated, Mr. Orin's argument in principal, which ATXI is attempting to strike, supports the two (2) alternate routes suggested by Intervenor, Stop the Power Line Coalition, both of which start with a section which runs due east from the Kansas Substation along the existing power lines.[2] RCECCC has to assume that these alternate routes were suggested on a timely basis, and all notice and procedural requirements for consideration of the routes have been met. As such, RCECCC would suggest that the testimony at issue of Mr. Orin can and should be admissible in this proceeding in support of the alternate routes suggested by Stop the Power Line Coalition, as the same run through rural Clark and Edgar Counties.

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[2] The proposed alternate routes made by the Stop the Power Line Coalition are also described on Pages 50 to 51 of the Direct Testimony of Greg Rockrohr (Lines 1051-64), who is the Staff's witness

7. The primary purpose of Mr. Orin's testimony was to oppose the Alternate Route proposed by ATXI through the property owned by the members of RCECCC. This land is not presently burdened by high voltage power lines, and provides a tranquil rural existence for the members of the group. The general point Mr. Orin was trying to make in the allegedly objectionable paragraph is that whenever possible, the routes of existing power lines should be considered for the installation of new lines, as the underlying property has already been burdened and devalued. RCECCC would suggest that this is a practical perspective which should remain in the record for the Commission's consideration.

WHEREFORE, Intervenor, RCECCC, would request that an order be entered denying the Motion to Strike Certain Intervenors' Untimely Alternate Route Proposals filed in this cause by Ameren Transmission Company of Illinois, at least as said motion relates to the Direct Testimony of George Orin on behalf of RCECCC, and for any and all further relief which is just and equitable in this situation.

Respectfully submitted,

RCECCC, Intervener

By: /s/William F. Moran, III
Its attorney

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CERTIFICATE OF SERVICE

I, William F. Moran, III, Counsel for Intervener, hereby certify that on April 18, 2013, I caused a copy of the foregoing **RESPONSE OF RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS TO THE MOTION TO STRIKE CERTAIN INTERVENORS' UNTIMELY ALTERNATE ROUTE PROPOSALS** to be served by electronic mail to the individuals on the Commission's Service List for Docket No. 12-0598.

/s/ William F. Moran, III
Counsel for Intervener

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