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COMMISSION

2013 APR 19 A 11: 15

April 18, 2013

CHIEF CLERK'S OFFICE

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  
TO MOTION TO STRIKE  
PORTIONS OF CERTAIN INTERVENORS' DIRECT TESTIMONY AND FOR AN  
EXPEDITED RULING

*As stated by Ameren, "Striking the following inadmissible portions of written testimony prior to hearing will facilitate the efficiency of the evidentiary process and will help preserve the integrity of the evidentiary record in this matter: • Donna Allen, pp. 2:33 ("the Allen family and the Dawson family"); 6:135-36; 6:139-41; 7:174-85, Ex. 3, & Ex. 4; 9:218-21 & Ex. 5. A number of intervenor witnesses purport to represent the views or positions of other parties or entities with respect to the Illinois Rivers Project ("Project"). This is impermissible for a number of reasons. In those instances in which the witness testifies to the views or positions held by another person, the testimony constitutes inadmissible hearsay..."*

I apologize for my unfamiliarity with the laws and regulations regarding this proceeding. However, I would hope that the system was not designed to eliminate comments from the average Illinois citizen.

My testimony included the submission of two letters written by Illinois residents on our behalf. (p. 7:181-185, Ex. 3 & Ex. 4) Since they do not own land that is directly impacted by the proceeding they did not choose to intervene but instead offered to submit their testimony through my petition to intervene.

Also in my testimony on p. 9, 216-221 and Ex. 5, I included correspondence with the Federal Highway Authority. Although I ran out of time to submit an alternate route (as explained in my "RESPONSE TO AMEREN TRANSMISSION COMPANY OF ILLINOIS' MOTION TO STRIKE CERTAIN INTERVENORS' UNTIMELY ALTERNATE ROUTE PROPOSALS", I feel that the information regarding I-70 should be considered.

I quote from Response to Donna Allen's First Set of Data Requests to ICC Staff, REQUEST Allen-Rockrohr 1.05: "*Mr. Rockrohr's understanding is that the Interstate 70 corridor is more than 10 miles south of the Kansas substation site, and therefore Mr. Rockrohr does not believe the Interstate 70 corridor to be a viable routing option for the Kansas to Indiana State Line segment of ATXI's proposed project.*"

However, if you look at the proposed routes on the map below, the I-70 corridor (highlighted in blue) falls right in between the proposed primary and alternate routes.



I do not see how the inclusion of the I-70 corridor has been overlooked as a viable option.

Whereas, for the reasons set forth above, I, Donna Allen, respectfully request that the Commission does not strike the following portions of my testimony; p. 7:181-185, Ex. 3 & Ex. 4; and p. 9:216-221 and Ex. 5.

A handwritten signature in cursive script, appearing to read "Donna Allen".

Respectfully submitted,  
Donna Allen, Intervenor

CERTIFICATE OF SERVICE

I, Donna Allen, Intervenor, hereby certify that on April 18, 2013, 1) I mailed a hard copy of this document to the ICC Chief Clerks Office; 2) I caused a copy of the foregoing RESPONSE TO AMEREN TRANSMISSION COMPANY OF ILLINOIS' 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 12-0598.



Donna Allen, Intervenor

*Verified by Vaishali Raju 4/18/13*

