

MAY 8, 2013

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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.

CHIEF CLERK'S OFFICE

Docket No. 12-0598

NOTICE OF SUPPORT
by DONNA ALLEN
for the SECOND ALTERNATE ROUTE
PROPOSED by STOP THE POWER LINES COALITION (SPLC)

Intervenor, Donna Allen, hereby notifies the Illinois Commerce Commission and the parties to this proceeding of its support for an Alternate Route on the Kansas to Indiana State Line portion of this power line project proposed by Intervenor, STOP THE POWER LINES COALITION ("SPLC"). In support, Donna Allen states as follows:

1. On January 25, 2013, the Administrative Law Judges (ALJ's) assigned to this cause entered an order granting SPLC leave to propose alternate routes through Clark and Edgar Counties, the same area where Donna Allen owns property.
2. In its Proposal on January 17, 2013, SPLC indicated opposition to both the Primary and Alternate Routes through this area proposed by Petitioner, AMEREN TRANSMISSION COMPANY OF ILLINOIS ("AXTI"), and instead recommended two (2) alternate routes, both of which initially followed a line due east from the Kansas Substation, along existing power transmission lines.
3. The main objection of Donna Allen throughout the course of this proceeding is the use of ATXI's Alternate Route through Clark and Edgar Counties due to it's failure to use existing right-of-ways.
4. Donna Allen would note that the ICC Staff, through the direct testimony of Greg Rockrohr, has shown support for the Second Alternative Route proposed by SPLC. *See*, Direct Testimony of Greg Rockrohr, Lines 1060-81.
5. Donna Allen would also note that according to the testimony of ATXI Rebuttal Witness Jerry A. Murbarber, the second alternative route proposed by SPLC is the least cost alternative, compared to ATXI's Primary and Alternate Routes, by \$1,571,000. *See*, Rebuttal Testimony of Jerry A. Murbarger, Lines 50-52, ATXI Exhibit 16.3 (Page 8 of 9).

6. Therefore, Donna Allen supports SPLC's Second Alternative Route as submitted in (PART 3) Stop the Power Lines Coalition's Motion for Leave to File an Alternate Route Proposal Instantly on January 17, 2013, including Exhibits: C (Map of Grandview), C (Map of Kansas) and D, at least as the same encourages the use of the existing right-of-ways.

7. On May 1, 2013, ATXI submitted a Motion to File and Admit a Stipulation between ATXI, STPL, TLE, JDL, Thrift and Thompson, and Edgar County Intervenor. This Stipulation effectively eliminates ATXI's Primary route and empirically changes the case.

8. Also in the Motion, ATXI implies that their "Stipulated Route – Kansas to State Line" is fully supported by Direct Testimony of Staff Witness Greg Rockrohr. As stated in #4 above, Mr. Rockrohr has also shown support for SPLC's Secondary Route.

9. On May 6, 2013, ATXI filed a MOTION TO STRIKE NOTICE OF SUPPORT BY RURAL CLARK AND EDGAR COUNTY CONCERNED CITIZENS FOR THE ALTERNATIVE ROUTES PROPOSED BY STOP THE POWER LINES COALITION. In the motion they are trying to eliminate the evidence of support for an opposing route. You have to wonder why they are fighting so hard on this one section, when they have been making concessions and stipulations in many other areas.

10. On May 7, 2013, ATXI filed their BRIEF IN RESPONSE TO THE ADMINISTRATIVE LAW JUDGE RULING OF MAY 3, 2013. On page 7 in the last bullet point they state: "*STPL(SPLC) has agreed to withdraw support for its alternate route proposals. (Id. at 34.) As a result, no significant alternatives to ATXI's Primary and Alternate routes are now proposed for this portion.*" While SPLC has agreed to withdraw its support, that does not mean that the alternate route is stricken from the proceedings. SPLC's Alternate route is still a viable proposal. It was submitted in a timely fashion and all parties impacted have been notified. Also, as stated above, SPLC's Second Alternate Route has the least amount of impact on the environment, local communities and the ecosystem because it follows an existing right-of-way.

11. Although Donna Allen is aware that Direct Testimony was due on March 29, 2013, for the reasons set forth in above she respectfully requests that these statements to be admitted to the hearing.

12. For all of these reasons, Donna Allen would request that her support be noted of record in this Docket for SPLC's Second Alternative Route.

Respectfully submitted,



Donna M. Allen

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CERTIFICATE OF SERVICE

I, Donna Allen, Intervener, hereby certify that on May 8, 2013, I caused a copy of the foregoing **NOTICE OF SUPPORT** by **DONNA ALLEN** for the **SECOND ALTERNATE ROUTE PROPOSED** by **STOP THE POWER LINES COALITION (SPLC)** to be served by electronic mail to the individuals on the Commission's Service List for Docket No. 12-0598.



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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 8th day of May, 2013.



NOTARY PUBLIC