

Ameren Transmission Company of Illinois's
Response to ICC Staff 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: 12/27/2012

ENG 2.05

Page 2 of 2 of ATXI Ex. 4.2 Part 27 shows ATXI's preferred route paralleling an existing 138 kV line that is adjacent to Reservoir Rd. east of Concord-Arenzville Rd., at which point the route jogs approximately 1/2 mile south and then east for 9/10th of a mile before returning back 1/2 mile north to Reservoir Rd. Please explain why ATXI did not instead choose a shorter route that parallels the existing 138 kV line along the Reservoir Rd. alignment for the entire distance across Page 2 of 2 of ATXI Ex. 4.2 Part 27. As part of the response, please provide the width of the existing rights-of-way for the 138 kV line along the Reservoir Rd. alignment.

RESPONSE

Prepared By: Donell Murphy
Title: Partner, Environmental Resource Management
Phone Number: 847-258-8912

Based on aerial interpretation, there is an existing building in the wooded area in the northwest portion of the intersection of Concord and Reservoir Roads. ATXI conservatively assumed this building is an existing residence. There is also an existing residence in the southwest portion of this same intersection. ATXI was not confident that the proposed transmission line could be placed such that neither of these residences would be displaced. As such, ATXI did not carry this route segment forward as a Proposed Route.

The easements for the existing 138 kV line along the Reservoir Rd. alignment were secured in the mid-1940's and do not specify a width. The only width referenced in these easements is for the right to cut or trim all trees and bushes growing upon the said land within fifty feet (50') of the said transmission line.

OFFICIAL FILE

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ILL. C. C. DOCKET NO. 12-0598
Staff-ATXI Int. Exhibit No. 1
Witness _____
Date 5/17/13 By MA

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Data Request Response Date: 1/9/2013

ENG 2.06R

Page 2 of 2 of ATXI Ex. 4.2 Part 41 and page 1 of 2 of ATXI Ex. 4.2 Part 42 show ATXI's alternate route in Divernon and Pawnee Townships southwest of ATXI's proposed Pawnee Substation site. A route that remained adjacent and parallel to the existing 138 kV transmission line that crosses Interstate 55 to the northeast (from about County Road 100 E until reaching County Road 2E) would be approximately 2 miles shorter than ATXI's alternate route. Please explain why ATXI chose not to propose a route that remained adjacent and parallel to the existing 138 kV line between County Road 100E on Page 2 of 2 of ATXI Ex. 4.2 Part 41 and County Road 2E on Page 1 of 2 of ATXI Ex. 4.2 Part 42?

RESPONSE

Prepared By: Donell Murphy

Title: Partner, Environmental Resource Management

Phone Number: 847-258-8912

ATXI's design preference is for transmission circuits to be located on separated rights-of-way for reliability, and operating, reasons. In some cases, "pinch points" occur, and the improved reliability benefits must be balanced against other societal costs, e.g. the separate right-of-way would need to be too close to homes, or go through a protected habitat. However, for the segment in question, no such "pinch point" occurred and separate rights-of-way were chosen.

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Data Request Response Date: 1/18/2013**

ENG 4.01

ATXI witness Rick D. Trelz explains that ATXI will seek to use overlapping easements, where feasible, in order to minimize the impact of the total easement area needed. (ATXI Ex. 5.0 at 7) Assuming ATXI's proposed 345 kV transmission line were constructed adjacent and parallel to an AIC-owned 138 kV transmission line that was constructed in the center of an existing 100-foot wide easement, please state how many feet of easement width, if any, would ATXI typically overlap, and what additional easement width would ATXI seek to acquire that would not overlap in order to obtain a 150-foot wide easement?

RESPONSE

**Prepared By: Jerry A. Murbarger
Title: Transmission Design Specialist
Phone Number: 217-424-8794**

ATXI objects to this request as vague. It is unclear what Staff means by "additional easement width [] ATXI [will] seek to acquire that would not overlap in order to obtain a 150-foot wide easement." To the extent this request assumes ATXI will require easements less than 150 feet where overlap may occur, that assumption is not correct. As stated in Mr. Murbarger's direct testimony (p. 7), ATXI will still require 150-foot easements when the Transmission Line parallels other electric transmission lines. The concept of "overlap" simply means that part of the 150 foot easement could occupy the same area as an existing easement.

Under the hypothetical above, there would be no overlap. There may be an opportunity for overlap if the 138 kV transmission line was constructed in the center of an existing easement that is wider than 100 feet. Such overlap, if any, could be up to or equal to the width of the existing easement beyond 100 feet divided by two. After the final route has been approved, if there are opportunities to overlap ATXI's 150-foot easement with an existing easement wider than 100 feet and maintain all clearance requirements, ATXI will do so.

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Data Request Response Date: 1/18/2013

ENG 4.03

Please provide or cite to all MISO documents/reports that identify specific locations for siting ATXI's proposed 345/138 kV substations and 345 kV transmission line segments.

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

The development of the MVP portfolio and the identification of its 345 kV transmission line segments and 345/138 kV substations was a multiple year collaborative effort between MISO, stakeholders, and MISO Transmission owners and potential substation sites were discussed at several meetings. The culmination of this extensive effort is contained in the "MISO Multi Value Project Portfolio Results and Analysis report" and the "MISO Transmission Expansion Plan 2011". Based upon the collaborative effort and analysis that was performed during the development of the MVP portfolio, these documents describe the general location of each of ATXI's proposed substations and 345 kV transmission line segments (see eg, MISO Multi Value Project Analysis Report, pp. 32-35).

MISO did not specify the specific, exact physical siting of the substations or 345 kV transmission line segments.

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Data Request Response Date: 1/18/2013

ENG 4.06

Please state whether AIC, ATXI, Ameren Services, and/or MISO studied whether any of AIC's existing 138 kV facilities will continue to be necessary and useful following completion of the Project. If no, why not? If yes, please identify AIC's 138 kV facilities (by location description) that will no longer be needed and provide a copy of the study that so demonstrates.

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

ATXI objects to this request to the extent it seeks information outside of ATXI's possession and control. Subject to and without waiving this objection, ATXI responds as follows.

ATXI has not undertaken a specific study of which of AIC's existing 138 kV facilities will continue to be necessary and useful following completion of the Project. All studies of the bulk electric system of which ATXI is aware included all existing AIC facilities, with the new facilities added to them. As such system performance was assessed with them energized and useful. As Mr. Kramer states in Direct Testimony, Exhibit 2.0, line 560-66, however, in order to insure the benefits from the Illinois Rivers Project can be provided reliably, some existing transmission equipment owned by Ameren Illinois would need to be replaced concurrent with the implementation of the Project. The decision on whether any existing facilities will need to be retired or removed would be made once the final decision is reached regarding line routing and substation location.

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Revised Response Date: 5/9/2013

ENG 5.02R

Referring to ATXI's response to Staff data request ENG 1.09, please explain why ATXI requires a breaker-and-a-half configuration to terminate its proposed 345 kV transmission line at each substation site. In providing your response to this data request, please provide a detailed explanation as to why ATXI and/or MISO determined that a different configuration would be inadequate: for example, a ring bus, or the 345 kV bus configurations/arrangements provided in response to Staff data request ENG 5.1.

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

ATXI objects to this request to the extent it asks for information outside ATXI's possession and control and as calling for speculation. Subject to and without waiving that objection, ATXI responds as follows. ATXI's engineering preference is to use breaker-and-a-half configuration for 345 kV with more than four connections. ATXI has determined that this configuration best serves maintenance, reliability and operational needs. The use of breaker-and-a-half configuration for certain substations in the Project is reflected in MTEP 11 Appendix A.

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Data Request Response Date: 4/16/2013**

ENG 6.01

Please state whether ATXI considered utilizing the existing 345 kV transmission line between Pawnee and Kincaid by constructing a new 345 kV transmission line from Kincaid to Mt. Zion as an alternative to the Pawnee-Pana-Mt. Zion segments it proposes to construct with its petition in order to move electricity from west to east across Illinois. If ATXI did so, please provide the results of ATXI's and/or MISO's studies that caused ATXI to reject this alternative. If ATXI did not, why did ATXI not consider this alternative?

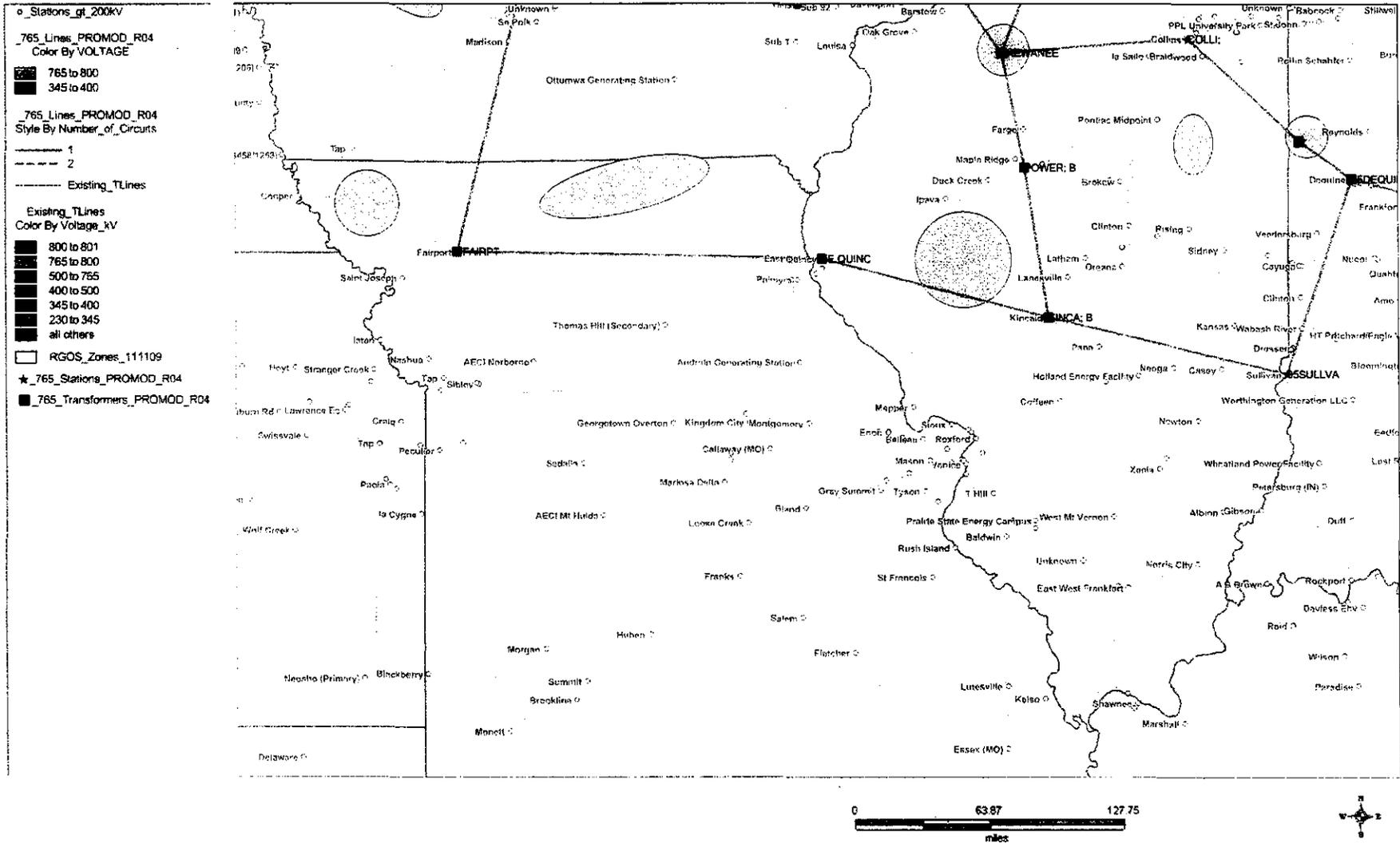
Prepared By: Dennis D. Kramer
Title: Director, Transmission Policy & Planning
Phone Number: 314-554-2238

ATXI objects to this request as seeking information outside of its possession and control. Subject to and without waiving this objection, ATXI responds as follows.

ATXI did not specifically consider a Kincaid - Mt. Zion 345 kV line as an alternative to the Pawnee-Pana-Mt Zion portion of the Illinois River Project. However the MISO multi-year RGOS and MVP portfolio development process examined numerous system configurations including the attached drawing which is one of several iterations considered (see ENG 6.01 Attach). Some additional configurations considered are described on page 35 of the MISO MVP Report and pages 62 and 63 of the MTEP11 Report. The RGOS and MVP development meetings were open to all stakeholders and ComEd transmission planners were participants with the opportunity to provide input during the evaluation of various potential system configurations (see Attachment A to Rebuttal Testimony of Jeff Webb, MISO).

ATXI can confirm discussions were held regarding additional connections to the Kincaid substation during the RGOS and MVP development meetings, however ATXI cannot find documentation of the meetings where additional connections to the Kincaid substation was determined to not be the preferred system configuration.

765_Ameren_Area



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Supplemental Data Request Response Date: 5/14/2013**

ENG 6.01S

Please state whether ATXI considered utilizing the existing 345 kV transmission line between Pawnee and Kincaid by constructing a new 345 kV transmission line from Kincaid to Mt. Zion as an alternative to the Pawnee-Pana-Mt. Zion segments it proposes to construct with its petition in order to move electricity from west to east across Illinois. If ATXI did so, please provide the results of ATXI's and/or MISO's studies that caused ATXI to reject this alternative. If ATXI did not, why did ATXI not consider this alternative?

RESPONSE

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

ATXI objects to this request as seeking information outside of its possession and control. Subject to and without waiving this objection, ATXI responds as follows.

In its role as Transmission Planner for ATXI and AIC, Ameren Services is familiar with the Commonwealth Edison Kincaid substation. The Kincaid substation utilizes a seven position ring-bus configuration which presents several operational and reliability challenges.

Among the more major issues with that type of configuration is that a Category C3 contingency event could result in two non-adjacent circuit breakers opening and result in a "splitting" of the ring bus into two electrically separate sections. This situation can have negative impacts on system reliability and market efficiency.

Additionally, performing maintenance activities is a challenge because removing a ring bus component for maintenance results in a situation where a single equipment failure could result in splitting the bus into two sections and result in the previously listed negative impacts.

These known issues would be factors in any decision on whether or not to connect to the Kincaid substation.

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Data Request Response Date: 4/22/2013**

ENG 7.05

Please identify all reasons ATXI believes constructing the Meredosia to Ipava segment using the stipulated route would be superior to constructing the segment using The Nature Conservancy's first alternative route submitted with its January 3, 2013, corrected filing.

RESPONSE

**Prepared By: Donell Murphy
Title: Partner, Environmental Resources Management
Phone Number: 847-258-8912**

The stipulated route would be superior to constructing the segment using The Nature Conservancy's first alternative route for several reasons. First, the Stipulated Route represents the agreement of the interested parties (ATXI and The Nature Conservancy) for this route area. Under the terms of the Stipulation The Nature Conservancy has withdrawn its support for its first alternate route. The Nature Conservancy agrees that the Stipulated Route is the preferred route for that area.

Second, The Nature Conservancy's first alternative route would locate the proposed 345 kV transmission line along an existing 138 kV line for a considerable distance. As previously addressed in the direct testimony of Mr. Hackman and identified in ATXI responses to data requests, locating the proposed transmission line along existing transmission facilities creates reliability concerns. ATXI has and would consider placement of the proposed transmission line along existing transmission corridors in areas where no other viable routing opportunity that allows for a reduction in the potential for impact is available. That is not the case in the Meredosia to Ipava area.

Further, routing the proposed transmission line along the existing transmission line as proposed by The Nature Conservancy would not reduce or minimize impacts presented by the Conservancy or other intervenors in this area. The proposed transmission line would be located in newly acquired right-of-way. Trees would still need to be removed in this right-of-way. Concerns associated with the topography and land uses along either of ATXI's proposed routes between Meredosia and Ipava would apply to any route identified within this area.

As such, since there is no significant net reduction in the potential for impact along The Nature

Conservancy's first alternative route, reliability concerns associated with this route can be avoided if ATXI's Alternate Route were utilized instead, and ATXI's Alternate Route best represents all factors considered within ATXI's comprehensive route siting analysis – including the incorporation of public input and the agreement between ATXI and The Nature Conservancy to resolve issues of concern, ATXI's Alternate Route between Meredosia and Ipava would be superior to The Nature Conservancy's first alternative route.

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Supplemental Response Date: 5/10/2013

ENG 7.05S

Please identify all reasons ATXI believes constructing the Meredosia to Ipava segment using the stipulated route would be superior to constructing the segment using The Nature Conservancy's first alternative route submitted with its January 3, 2013, corrected filing.

RESPONSE

**Prepared By: Donell Murphy
Title: Partner, Environmental Resources Management
Phone Number: 847-258-8912**

See also ATXI Ex. 13.0, pp. 21-30, ATXI Ex. 18.0 and ATXI Ex. 19.0.

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Data Request Response Date: 5/10/2013

ENG 8.08

Referring to lines 185-195 of ATXI Ex. 12.0, when analyzing its system contingencies to verify NERC compliance, please state whether ATXI would analyze transmission lines that occupy parallel but separate and non-overlapping rights-of-way in a different manner than it would analyze transmission lines that do not occupy parallel but separate and non-overlapping rights-of-way. If yes, please describe and explain the special contingency analysis that ATXI would undertake for these lines.

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

Two transmission lines that are parallel but do not occupy a common right-of-way (and therefore are not on a common structure) are analyzed as a Category C3 Contingency Event. The event sequence would be: 1) failure of a system element followed by, 2) manual system adjustment followed by, 3) failure of a second system element. If more than two lines have these characteristics, Ameren Services as the Transmission Planner may analyze the impact of multiple lines failing simultaneously. Generally there is less risk in having separate rights-of-way that are physically separated by several miles but Ameren Services recognizes that sometimes using common or adjacent rights-of-way is the preferred solution.

Two transmission lines that are on a common structure (and therefore are on a common right-of-way) are analyzed as a Category C5 Contingency Event. The event sequence would be the simultaneous failure of both lines on the common structure without allowance for manual adjustment between each line's failure. Therefore Ameren Services as the Transmission Planner seeks to minimize the situations where two or more lines are on a single structure for considerable distances because the simultaneous loss of lines on a common structure must be considered. However Ameren Services recognizes that sometimes having two circuits on a single structure is the preferred solution.

There are other analyses that Ameren Services would perform per NERC TPL standards to evaluate risks and consequences of:

- Loss of all lines on a common right-of-way (Category D7)
- Loss of a towerline with three or more circuits (Category D6)
- Events that could result in the simultaneous outage of multiple lines that may be on separate, non-parallel right-of-ways.
 - Loss of a substation (one voltage level plus transformers) (Category D8)
 - Failure of a bus section (Category C1)

- Failure of a circuit breaker (Category C2)

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Data Request Response Date: 5/6/2013

ENG 8.13

Referring to lines 173-180 of ATXI Ex. 13.0:

- a) If ATXI were to use the N. Kohl Grocer's second alternate route proposal for the River to SE Quincy segment, please state whether ATXI is certain that the proposed 345 kV line would need to cross an existing 161 kV transmission line at least two times to avoid displacing residences. If no, why is ATXI not certain? If yes, please provide a map showing the residences, the 161 kV transmission line, and the location of the right-of-way that would require the displacement of the two residences.
- b) Please explain what alternatives, other than crossing the 161 kV transmission line twice, ATXI would consider using in order to avoid displacement of residences if the Commission ordered ATXI to use the N. Kohl Grocer's second alternate route proposal. In ATXI's response, please explain whether ATXI could place the two transmission lines on a common structure in order to pass through this finite area.
- c) If ATXI were to use the N. Kohl Grocer's second alternate route proposal for the River to SE Quincy segment, please state whether ATXI is certain that inadequate space exists for the proposed 345 kV line to cross State Highway 57 without displacement of at least one resident? If no, why not. If yes, please provide a map showing the residence and the location of the right-of-way that would require the displacement of the residence.
- d) Please explain what alternatives for the State Highway 57 crossing, other than displacing a residence to obtain an additional 150 foot right-of-way, that ATXI would consider if the Commission ordered ATXI to use the N. Kohl Grocer's second alternate route proposal. In ATXI's response, please explain whether ATXI could place the two transmission lines on a common structure in order to pass through this finite area.

RESPONSE

Prepared By: Donell Murphy a) and c); Jeffrey V Hackman b) & d)
Title: Partner, Environmental Resources Management
Phone Number: 847-258-8912

a) ATXI is certain that the proposed Transmission Line would have to cross an existing 138 kV transmission line two times to avoid displacing two residences, while also allowing for appropriate separation between the two lines. Ms. Murphy incorrectly referred to this line as 161 kV previously. It is 161 kV west of the substation along Highway 57 and 138 kV east of Highway 57. The two assumed residences of question both occur east of Highway 57. The attached maps show the location of these two assumed residences.

b) ATXI objects to this request as calling for speculation. Subject to and without waiving this objection, ATXI responds as follows. If directed by the Commission in the Final Order in this Docket to use the N. Kohl Grocer second alternative route, which is no longer supported by N. Kohl Grocer per the stipulation, ATXI could consider: whether the line could go over a portion of the property on which the residence(s) exist by shifting slightly and adding structures to minimize blowout while maintaining field levels, whether the line could go over the residence(s) directly at a very high elevation, and whether the two lines could be placed on a common structure. There may be other alternatives which would be possible once further field investigation where conducted. As to the option for both circuits to be on a common structure, there is no physical reason that the arrangement can not be constructed. However, the cost of this option has not been studied, the ability to take an extended outage on the existing circuit for construction has not been evaluated during the time this segment of Illinois Rivers is expected to be constructed, and no planning has been done to evaluate this option.

c) ATXI is certain that the proposed Transmission Line would displace an assumed existing residence if it were required to cross Highway 57 on the north side of the existing substation. The attached map shows the location of this assumed residence.

d) see b)

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Data Request Response Date: 5/6/2013**

ENG 8.20

Referring to lines 668-669 of ATXI Ex. 13.0, please state whether the sole reason for Ms. Murphy's conclusion that the Pearce Family's "primary" alternative route is not viable is the fact that the Pearce Family's "primary" alternative route parallels an existing 138 kV line.

RESPONSE

**Prepared By: Donell Murphy
Title: Partner, Environmental Resources Management
Phone Number: 847-258-8912**

No. There is no net reduction in the potential for impact to existing residences along the Pearce Family's primary alternative route yet this route would affect property owners other than the Pearce's. Whether the proposed 345 kV line were located on either the north or the south side of the existing 138 kV line, there would be two assumed residences within 500 feet. This is no different from the two assumed residences within 500-feet of ATXI's Primary Route.