

**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)	Docket No. 12-0598
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.)	

BRIEF OF GREGORY AND THERESA PEARCE

Now come GREGORY and THERESA PEARCE, Sangamon County landowners within the geographical area subject to this proceeding and pro se intervenors, (hereinafter the “Pearces”). We hereby submit our brief in support of Ameren Transmission Company of Illinois’ (hereinafter ATXI) Rebuttal Recommended Route, then our first alternative route and lastly, our second alternative route herein say:

I. INTRODUCTION

On November 7, 2012, ATXI pursuant to Section 8-406.1 and 8-503 of the Illinois Public Utilities Act, 220 ILCS 5/8-406.1, 8-503, petitioned the Illinois Commerce Commission (the “Commission”) for the issuance of a Certificate of Public Convenience and Necessity authorizing ATXI to construct, operate, and maintain a new 345kv transmission line, and related facilities in the areas of the state of Illinois. Thereafter, the Pearces petitioned and were granted leave to intervene in the proceedings.

II. REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

Section 8-406.1(f) of the Public Utilities Act (“Act”), 220 ILCS 5/8-406.1, requires the Commission to grant the requested Certificate “if the Project will promote the public convenience and necessity” as determined by three criteria: (i) need for the project, (ii) managerial, supervisory and technical capability; and (iii) financial capability. ATXI has met these obligations and presented adequate evidence to the Commission justifying the issuance of a Certificate of Public Convenience and Necessity.

III. OVERALL NEED FOR THE PROPOSED FACILITIES

The Pearces support ATXI in their efforts to obtain a Certificate of Public Convenience and Necessity except that we object to ATXI’s unmodified Primary Route.

IV. LEAST-COST AND THE PROPOSED TRANSMISSION LINE ROUTES

D. Meredosia – Pawnee

1. Length of the Line and
2. Difficulty and Cost of Construction and
7. Number of Affected Landowners and other Stakeholders

Gregory and Theresa Pearce support ATXI’s Rebuttal Recommended Route as the most viable route for the Meridosia – Pawnee segment. We do however respectfully disagree with the Revised Rebuttal Testimony of ATXI’s Donell Murphy (ATXI Exhibit 13.0c 2d Rev. Pages 31-33) regarding our first and second alternative routes.

Our first alternative route, a short segment following an existing ACI 138kv corridor, is shorter with fewer dead end structures, and impacts the same number of residences on an established transmission corridor, as ATXI's primary route. (Pearce Exhibit 1 (F); ICC Staff Exhibit 1.0R lines 763-776) .Likewise, we also believe our second alternative route to be viable. That modification to the primary route moves the line a half section north in the same field as ATXI proposed, then back to its original primary route. (Pearce Exhibit 1 (G)). This modification avoids two residences at the cost of two dead end structures. ATXI's route modification around the EWPP Floodplain Easement is a similar modification. "Each adjustment is very minor. Therefore, no other sensitivities are significantly impacted by the adjustments. There is little cost difference between the unadjusted and adjusted routs" (ATXI Exhibit 13.0c 2d Rev. Page 66, lines 1413-1425).

8. Proximity to Existing and Planned Development

Gregory and Theresa Pearce also strongly disagree with ATXI's Rick Trelz (ATXI Exhibit 15.0 Pages 13-16 Lines 261-324). ATXI's claim is to compensate those with whom they will have an easement agreement with. However, they are failing to state that there will be no compensation to property owners along the easement whose property values surely will be affected. In regards to our property value, Mr. Trelz's faulty assertion that because no specific analysis has been conducted on our property or on the Illinois Rivers Project in general, our property devaluation shouldn't be considered. (Pearce Exhibit 1(M 1.05)).Until the power line is constructed, and an

appraisal and/or sale are complete, there is no definitive, quantifiable amount of devaluation. That time is too late. We are not nameless, faceless, dots on a map. We are people who have worked 23 years for our home and may lose thousands of dollars that can't be quantified and proven until the loss of equity has actually happened. This is the reason we have submitted, and are standing by our two alternate route proposals and are praying for your consideration.

Very importantly, our daughter, Emily, has Down syndrome which increases her risk of developing childhood leukemia by 14 times, without constant exposure to a high voltage transmission line. She has had a series of health concerns. Some of which are ongoing. She continues to have abnormal blood cell counts. We as parents do not want her to have to fight for her life yet again. A risk of leukemia is something we don't take lightly (Pearce Exhibit 1 (Part 8)).

As Emily's parents it would be unconscionable for us to ignore the possible health risks to our child. It would be negligent for us as parents to ignore the fact that ATXI would not route these transmission lines near schools, hospitals, day care centers and retirement homes, but would allow the lines to pollute our daughter's bedroom as she sleeps or the yard she plays in. We would have to move to reduce that risk.

V. Managing and Supervising the Construction Process

Gregory and Theresa Pearce believe that ATXI possess the managerial and technical expertise to construct and operate this project.

VI. Financing the Proposed Construction

Gregory and Theresa Pearce believe ATXI is capable of financing this project.

Respectfully submitted,

Gregory and Theresa Pearce
Pro se Intervenors
Sangamon County Landowners

STATE OF ILLINOIS :
 :
 COUNTY OF SANGAMON :

VERIFICATION

We, being property owners on the primary route of Ameren's Illinois Rivers Transmission Project, have read the above and foregoing document, have knowledge of the facts stated herewith and state that the matters set forth therein are true in substance and in fact.

Gregory Pearce Theresa Pearce
Gregory Pearce and Theresa Pearce
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SUBSCRIBED AND SWORN to me, a Notary Public, on this 1st day of
June, 2013



Casey Blakeley

Notary Public

PROOF OF SERVICE

STATE OF ILLINOIS :
 : SS
COUNTY OF SANGAMON :

We, being property owners on the primary route of Ameren's Illinois Rivers Transmission Project, herewith certify that we did on the 1st day of June, 2013, electronically file with the Illinois Commerce Commission, our initial brief, and electronically served same upon the persons identified on the Commission's official service list.

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SUBSCRIBED AND SWORN to me, a Notary Public, on this 1st day of June, 2013.



Casey Blakeley
Notary Public