

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

ILLINOIS COMMERCE COMMISSION )

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

**REPLY BRIEF**

**OF**

**Wind on the Wires**

Sean R. Brady  
Wind on the Wires  
P.O. Box 4072  
Wheaton, IL 60189  
T: 312-867-0609

JUNE 10, 2013

## TABLE OF CONTENTS

I.	INTRODUCTION.....	- 1 -
II.	REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY .....	- 1 -
III.	OVERALL NEED FOR THE PROPOSED FACILITIES.....	- 1 -
IV.	LEAST-COST AND THE PROPOSED TRANSMISSION LINE ROUTES .....	- 3 -
V.	MANAGING AND SUPERVISING THE CONSTRUCTION PROCESS.....	- 3 -
VI.	FINANCING THE PROPOSED CONSTRUCTION .....	- 3 -
VII.	OTHER SECTION.....	- 3 -
VIII.	CONCLUSION .....	- 4 -

Wind on the Wires, by and through its counsel, pursuant to Section 200.800 of the Commission's Rules of Practice (83 Ill. Adm. Code 200.800) and the schedule stated in the "Revisions to December 14, 2012 Case Management Plan" in the Administrative Law Judge's Notice of January 24, 2013, respectfully submits its Reply Brief in the above captioned matter.

## **I. INTRODUCTION**

Wind on the Wires' brief will respond to Rural Clark & Edgar County Concerned Citizens ("RCECCC") and the Ragheb Family on issues they raise in section III Overall Need for the Proposed Facilities.

## **II. REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY**

This Section is Intentionally Left Blank

## **III. OVERALL NEED FOR THE PROPOSED FACILITIES**

In its initial brief, Rural Clark & Edgar County Concerned Citizens ("RCECCC") raise the question as to whether the segment from the proposed Kansas substation site to the Indiana state line is necessary at this time and recommends that it not be approved. (Initial Brief of Rural Clark & Edgar County Concerned Citizens at 7). As support for its position RCECCC argues that there is no transmission siting approval proceeding ongoing in Indiana to interconnect the line in Indiana. (Id. at 6) This request should be denied. Basically, RCECCC is asking the Commission to direct Ameren Transmission Company of Illinois ("ATXI") to refile for approval of the final segment of the Illinois Rivers Project after the Indiana Utility Regulatory Commission approves the portion of the line under its jurisdiction. The Commission should not approve this chicken or egg scenario. ATXI and

Midcontinent Independent System Operator (“MISO”) have shown that the entire line is needed to meet the standards in section 8-406.1(f), and the line should be approved as submitted. (See Initial Brief of Ameren Transmission Company of Illinois (“ATXI IB”) at 5-15; Initial Post-Hearing Brief by the Midcontinent Independent System Operator, Inc. (“MISO IB”) at 4-10).

In its initial brief, the Ragheb Family states that the record does not contain better alternatives to the overall Illinois Rivers Project and that the Commission should look for such transmission lines before approving this project. While the Ragheb Family agrees that the Illinois Rivers Project improves system reliability and makes the electric market within Illinois more economic than status quo (Initial Brief of Intervenors Magdi, Barbara and Adam Ragheb (“Ragheb Family”)(“Ragheb Family IB”) at 4), they argue that

No quantitative data was presented in this case demonstrating that the benefit-to-cost-ratio of those options [referring to the Multi Value Project transmission lines the Midcontinent Independent Systems Operator reviewed and approved], interpreted to include a 765 kV AC or HVDC facilities, was lower than that of the 345 kV option. The presentation of such information would, in our opinion, make for a more-complete record in this case, and provide a definitive answer as to which project option provides the greatest benefit-cost ratio to Illinois ratepayers. (Ragheb Family IB at 2-3).

Pursuant to Section 8-406.1, the Commission is to review new high voltage electric service lines for compliance with the stated standards, however, the statute does not require the Commission to consider all potential permutations, nor to act as a transmission planning commission.

ATXI’s brief demonstrates how the Illinois Rivers Project complies with section 8-406.1, therefore, the Commission should not follow through on the Ragheb Family comments. (See MISO IB generally). In addition, MISO’s brief explains that a number of lines were looked at as part of the Multi Value Project (“MVP”) Analysis, including 765 kV

lines. In its analysis of the MVPs, MISO found the 765 kV lines were less suitable than 345 kV lines for “the stated purpose for which the MVP portfolio was created and designed to meet.” (MISO IB at 7 *citing* MISO Exh. 2.0(Rev.) at 6-7).

**IV. LEAST-COST AND THE PROPOSED TRANSMISSION LINE ROUTES**

This Section is Intentionally Left Blank

**V. MANAGING AND SUPERVISING THE CONSTRUCTION PROCESS**

This Section is Intentionally Left Blank

**VI. FINANCING THE PROPOSED CONSTRUCTION**

This Section is Intentionally Left Blank

**VII. OTHER SECTION**

This Section is Intentionally Left Blank

## VIII. CONCLUSION

WHEREFORE, Wind on the Wires respectfully requests that the Commission find that the Illinois Rivers Project [1] will promote the development of an effectively competitive electricity market that operates efficiently, and [2] provides costs and benefits equitable to all customers, which is consistent with the arguments set forth in our Initial Brief.

---

Sean R. Brady

Wind on the Wires  
Regional Policy Manager and  
Counsel  
P.O. Box 4072  
Wheaton, IL 60189  
312-867-0609

June 10, 2013