

**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 )  
Public Utilities Act, and an Order pursuant to Section 8- ) Docket No. 12-0598  
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, Macon, Clark, Coles, Edgar, Fulton, )  
Macon, Montgomery, Morgan, Moultrie, Pike, )  
Sangamon, Schuyler, Scott and Shelby, Illinois. )

**RESPONSE TO APPLICATION FOR REHEARING  
OF AMEREN TRANSMISSION COMPANY OF ILLINOIS**

**NOW COMES** Intervenor Leon Corzine (Corzine), through his attorneys, and for his Response to Application for Rehearing of Ameren Transmission Company of Illinois, states as follows:

1. Ameren Transmission Company of Illinois, Inc. (ATXI), filed a timely application for rehearing of the Commission's August 20, 2013, Order in this matter.
2. Section 200.880 of Title 83 of the Illinois Administrative Code, which governs applications for rehearings, states that "[t]he application shall state the reasons therefore and shall contain a brief statement of proposed additional evidence, if any, **and an explanation why such evidence was not previously adduced.**" 83 Ill.Admin.Code 200.880 (emphasis added).
3. ATXI's Application for Rehearing must be denied because it contains no explanation why the evidence it proposes to submit was not previously adduced. An Application for Rehearing serves the same purpose as a motion to reconsider, and "[a] motion to reconsider 'should not be allowed in the absence of a reasonable explanation of why [the new evidence] was not available at the time of the original hearing.'"

Martinez, 372 Ill.App.3d 515, 522 (1st Dist. 2007)(Quoting *Delgatto v. Brandon Associates, Ltd.*, 131 Ill.2d 183, 195 (1989)).

WHEREFORE Intervenor Leon Corzine prays that the Application for Rehearing of Ameren Transmission Company of Illinois be denied.

DATED this 23rd day of September, 2013

By: /s Christopher M. Ellis  
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### **PROOF OF SERVICE**

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Intervenor Leon Corzine, herewith certify that I did on the 23rd day of September, 2013, electronically file with the Illinois Commerce Commission, a Response to Application for Rehearing of Ameren Transmission Company of Illinois, and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis  
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