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November 13, 2013

Ms. Elizabeth Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capital Avenue  
Springfield, Illinois 62701

Re: Rehearing on Illinois Rivers Project, Docket No. 12-0598

Dear Ms. Rolando:

On September 19, 2013, the Midcontinent Independent System Operator, Inc. ("MISO") filed an Application for Rehearing. In that Application, MISO stated its concern that the Order issued on August 20, 2013 deferred approval for certain segments and substations of the Illinois Rivers Project ("IRP" or "Project") proposed by Ameren Transmission Company of Illinois ("ATXI"). The Order granted a Certificate of Public Convenience and Necessity for only portions of the Project.<sup>1</sup>

Based upon the Order's conclusion that there is a general need for the entire Project, but the Order's failure to grant a Certificate of Public Convenience and Necessity for each segment and substation of the Project, MISO requested that the ICC's findings be reconsidered on rehearing to approve the entire IRP. The IRP should be approved to provide the benefits, without delay, that the Project was designed to provide. In the event that the ICC sought additional support for portions of the Project, MISO requested that the ICC grant rehearing to take additional evidence to resolve any outstanding issues.<sup>2</sup> The IRP should be constructed and connected in a timely manner to eliminate any gaps in the transmission line, and rehearing should help resolve the outstanding issues in a timely fashion.<sup>3</sup>

As the Commissioners noted at the October 2, 2013 Bench Session, and as the administrative law judges explained in their related memorandum, MISO's rehearing recommendations were similar to those stated by ATXI.<sup>4</sup> ATXI, however, also discussed the location of the transmission line and related routing issues. ATXI is the entity that can provide the ICC with the additional evidence that supports the timely completion of the Project that is

<sup>1</sup> Order at 133 (August 20, 2013).

<sup>2</sup> MISO Application for Rehearing at 4 (September 19, 2013).

<sup>3</sup> ALJ Memorandum at 2-3 (September 25, 2013); Bench Session Minutes at 28-30 (October 2, 2013).

<sup>4</sup> Id.

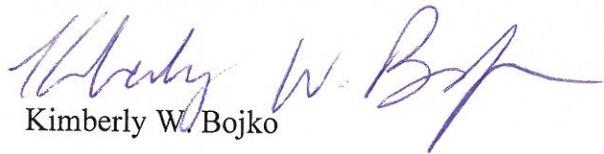
Ms. Elizabeth Rolando  
November 13, 2013  
Page 2

CARPENTER LIPPS & LELAND LLP

emphasized in MISO's rehearing request. Accordingly, MISO is not submitting additional testimony at this time; but, instead, will rely upon the existing record as the record is supplemented by ATXI.

MISO, however, reserves its right to file rebuttal testimony if necessary.

Respectfully submitted,



Kimberly W. Bojko

Attorney for MISO

cc: Parties of Record