

ILLINOIS COMMERCE COMMISSION

Docket No. 12-0598 (R)

DIRECT TESTIMONY

OF

MARY BURNS

Submitted on Behalf of the Coalition of Property Owners and Interested Parties in Piatt, Douglas
and Moultrie Counties, Channon Family Trust, and Identification of Channon Alternate Route

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WITNESS IDENTIFICATION

Q. Would you please state your name, address and basic background relevant to this proceeding.

A. Yes. My name is Mary Burns and my address is 10 Oakwood Dr, Springfield, IL. I have a B.S. degree in mathematics from Eastern Illinois University, a Masters degree in Administration from Sangamon State University (now University of Illinois at Springfield), and a PhD in Quantitative Evaluation and Research Methodology from the University of Illinois at Urbana/Champaign.

I am a member of the PDM intervenor group, and am working with the Channon Trust intervenor group. I have followed the proceedings for case #12-0598 and throughout this proceeding have reviewed and analyzed documents and assisted in the preparation of documents pertaining to PDM. I prepared direct testimony for the original proceeding in this case. Before ATXI entered into a stipulation with MCPO, I was listed as a witness for ATXI. I have been a farmland owner for thirty years and am a third generation owner of the Piatt County farm on which I was raised.

Q. How does the ATXI Illinois Rivers Project personally affect you?

A. The ATXI stipulated route from Mt. Zion to Kansas cuts through a 160-acre parcel of prime, class A farmland owned by my brother and me and farmed as a single tract.

24 INTRODUCTION

25

26 **Q. What is the purpose of your testimony?**

27 A. ICC Staff has proposed a substation site about 3 miles south of Mt. Zion, which is on
28 ATXI's primary route to Kansas. The purpose of my testimony is to suggest that ICC Staff
29 consider the option of routing to Kansas on a hybrid of ATXI's primary and alternate routes, and
30 to show how that option compares to other options for routing to Kansas.

31

32 **Q. Are you offering testimony as an engineer or expert witness?**

33 A. No, I am not an engineer. I am not introducing new evidence or data to support a newly
34 formulated route. I am simply using record evidence and readily obtainable information to
35 compare options using existing routes that ATXI has developed.

36

37 **Q. Have you previously testified before the Illinois Commerce Commission?**

38 A. No.

39

40 MT. ZION SUBSTATION

41

42 **Q. For this rehearing have other witnesses introduced testimony related to the Mt.
43 Zion substation?**

44 A. Yes. Mr. Dan Long and Ms. Julie Miller have submitted what I believe to be compelling
45 testimony as to the lack of need for a Mt. Zion substation.

46

47 **Q. If the Commission determines that approval of a Mt. Zion substation is warranted,**
48 **do you have an opinion as to which of the competing locations is the best option?**

49 A. Yes. If the Commission decides there is a need for a substation, then Staff Option 1 is the
50 best choice for a location. For the Mt. Zion to Kansas segment, Staff Option 1 will result in
51 three-quarters of a mile less of 345kv route as compared to Staff Option 2 and will result in
52 approximately five (5) miles less of 345kv route as compared to the ATXI proposed site. For the
53 Pawnee/Kincaid to Mt. Zion segment, using Staff Option 1 will result in similar savings in route
54 length. In addition, based on Ms. Julie Miller's testimony, the further south the substation is
55 located, the potential for undesirable effects on the Village of Mt. Zion will be mitigated.

56

57 ALTERNATE ROUTE PROPOSAL

58

59 **Q. What is the Channon alternate route proposal from Mt. Zion to Kansas?**

60 A. The Channon alternate route is not a new route proposal; it is simply a hybrid of ATXI's
61 existing routes. The Channon Hybrid Route is the ATXI Primary Route from the Staff Option 1
62 substation site to Moultrie County, East Nelson Township where the ATXI Primary Route and
63 ATXI Alternate Route meet, near the junction of Sections 2, 3, 10 and 11. From there, the
64 Channon Hybrid Route is the ATXI Alternate Route to the Kansas substation. This hybrid is
65 consistent with Staff's placement of the Mt. Zion substation on the ATXI primary route to
66 Kansas. Midway to Kansas, ATXI's two routes intersect, and from that point either the primary
67 or alternate route can be used to reach Kansas. Staff should consider which of the two routes is
68 the best way to complete the segment to Kansas.

69

70 **Q. Does the Channon Hybrid Route affect any new property owners?**

71 A. No. This route utilizes existing segments of ATXI's proposed routes. ATXI has
72 provided names and addresses for the notification of all affected property owners along its route
73 proposals and all such owners have previously been notified. ATXI has also previously filed
74 detailed mapping for these route segments.

75

76 COMPARATIVE ANALYSIS

77

78 LENGTH

79 **Q. How does the proposed Channon Hybrid Route compare in length with the**
80 **MCPO/ATXI stipulated route from Mt. Zion to Kansas, which will hereafter be referred to**
81 **as the "MCPO route"?**

82 A. The Channon Hybrid Route is the shorter route. PDM Ex. 6.1 shows that the length for
83 the Channon Hybrid Route is eight (8) miles shorter than the MCPO route.

84

85 COST

86 **Q. Did ATXI provide cost estimates for the various route proposals for the Mt. Zion to**
87 **Kansas segment?**

88 A. Yes. ATXI included cost estimates with the Murbarger Rebuttal Testimony (ATXI
89 Exhibit 16.3, page 7). For each of the routes for which ATXI presented cost estimates, these
90 estimates and the associated route miles were used to calculate an average cost per mile and are
91 presented in PDM Ex. 6.2.

92

93

94 **Q. If an average cost per mile, calculated from ATXI cost estimates, were used, what**
95 **would be the estimated cost of the proposed Channon Hybrid Route?**

96 A. As summarized in PDM Ex. 6.2 and using cost estimates provided by ATXI, the highest
97 average cost per mile is for the ATXI Primary Route (\$1,934,239). Using this high average and
98 a length of 61.2 miles, the Channon Hybrid Route would cost \$118,375,000.

99

100 **Q. How does this cost compare to the MCPO route cost?**

101 A. The ATXI estimated cost for the MCPO route is \$126,511,000 which is \$8,136,000 more
102 costly than the estimate for the Channon Hybrid Route.

103

104

OFF-COURSE ROUTING

105 **Q. Does the MCPO route result in off-course routing?**

106 A. Yes. Because Kansas is southeast of Mt. Zion, any routing to the north is off-course.
107 From the ATXI proposed substation site the MCPO route heads far to the north and is off-course
108 7.5 miles. As a comparison, the Channon Hybrid Route heads in a southeasterly direction and
109 uses limited off-course routing to stay aligned with section and half-section lines while avoiding
110 obstructions.

111

112 **Q. How do off-course routing preferences by MCPO affect route length?**

113 A. For the purpose of avoiding Moultrie County, the MCPO route travels unnecessary
114 additional miles resulting in added length and cost to make off-course route preferences possible.

115 (PDM Ex. 6.3).

PARALLEL ROUTING

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Q. Did ATXI present testimony regarding parallel routing and if so, what did ATXI conclude?

A. Yes. ATXI witness Hackman provided testimony regarding parallel routing (ATXI Ex. 12.0, page 4 – 10, lines 68 – 201) and concluded the following:

ATXI Ex. 12.0, page 10, lines 196-201

Q. What do you conclude about paralleling transmission lines as it relates to the Project?

A. Since the Project provides local area reliability benefits, and the existing AIC circuits were generally built for local area reliability, paralleling should only be used in very limited circumstances in order to mitigate risks of common-mode failures that could lead to outages for customers.

Q. Were issues raised regarding the balancing of parallel routing (to existing transmission lines) with societal and environmental impacts?

A., Yes. ATXI witness Hackman testified regarding these issues pertaining to the MCPO route that utilizes approximately 14 miles of parallel routing.

Hackman cross 05/17/2013, page 1022, lines 8 – 22; page 1023 lines 1 - 8

Q. Now, in your cross-examination today, you talked about the balancing of societal/environmental impacts against Ameren's concerns about paralleling and sometimes that balance tipped in favor of the societal/environmental impacts --

139 A. *That's --*

140 Q. *-- to justify paralleling; is that correct?*

141 A. *That's correct.*

142 Q. *Now, would it be correct to say that Ameren's balancing -- I'm sorry -- that the*
143 *balancing of concerns about paralleling and reduced environmental and societal*
144 *impacts associated with MCPO's Mount-Zion-to-Kansas route -- that -- strike that.*
145 *That -- in balancing the environmental -- let me try to figure out how I want to say*
146 *this. Would it be correct that, in conducting that balancing here, ATXI concluded that*
147 *the reduced societal and environmental impacts associated with MCPO's Mount-Zion-*
148 *to-Kansas route justified paralleling in this particular instance?*

149 A. *Yes, that's exactly how we came to that conclusion.*

150

151 Q. **What are the most important societal and environmental impacts to be mitigated by**
152 **parallel routing?**

153 A. Assuming parallel routing would in fact mitigate these impacts, public input suggests that
154 routing should minimize crossing farmland previously untouched by structures such as those
155 used for this 345kv project.

156

157 Q. **What are the mileage relationships between the MCPO parallel routing and off-**
158 **course routing?**

159 A. The MCPO route parallels existing transmission lines for approximately 14 miles.
160 Because the MCPO route is off-course 7.5 miles, it unnecessarily traverses additional farmland.
161 In addition, the MCPO route is longer in length which results in more easement acres. Thus, any

162 perceived benefits achieved by paralleling are canceled by the off-course miles and longer length
163 of the MCPO route. The MCPO route, therefore, cannot and does not provide net positive
164 results regarding paralleling.

165

166 **Q. What, if any effect will the MCPO route have on visual impact?**

167 A. The MCPO route parallels existing transmission lines and it was argued that this may
168 result in some reduction in visual impact in the area where paralleling exists. But any perceived
169 visual benefits achieved by paralleling are canceled by the off-course miles and longer length of
170 the MCPO route. The MCPO route therefore cannot and does not provide net positive results
171 regarding visual impact.

172

173 QUANTITY and QUALITY of FARMLAND

174 **Q. What is the definition of prime farmland as used by ATXI to determine the number**
175 **of prime acres in its route corridor?**

176 A. Based on ATXI's response to DR 1.05 (a), ATXI uses The Natural Resource
177 Conservation Service (NRCS) definition of soil types as identified in ATXI Exhibit 4.3,
178 Appendix A, pages 53-87. ATXI Exhibit 4.3 categorizes soil types into two broad categories,
179 "Potential Prime Farmland" and "Hydric." This categorization would best describe the
180 unmanaged state of farmland, especially for soils classified as "Hydric" (but potentially prime)
181 and described as "Prime, if drained."

182

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184

185 **Q. Is there a different and more refined method for the categorization of farmland that**
186 **recognizes current agricultural management practices?**

187 A. Yes. Productivity Indexes (PIs) were developed. This information is readily available –
188 see Table S2 rev. Productivity of Illinois Soils under Optimum Management, Slightly Eroded, 0
189 to 2 Percent Slopes, Optimum Crop Productivity Ratings for Illinois Soil, by K.R. Olson and
190 J.M. Lang, Office of Research, College of Agricultural, Consumer and Environmental Sciences
191 (ACES), University of Illinois at Urbana-Champaign.

192

193 These indexes recognize that high quality farmland is optimally managed, and included within
194 that management are long-standing drainage practices that have allowed “potential prime
195 farmland” to achieve its optimal potential. For each identified soil type, the assigned PI provides
196 for a relative comparison of soil quality and productivity. This methodology more fairly reflects
197 the realities of agricultural practices and how those practices have resulted in the realization of
198 the full and true potential of soil quality in the Mt. Zion to Kansas geographical area. As a
199 reflection of the importance of PIs, farmland today is bought and sold on the basis of its PI.

200

201 **Q. How are PIs used to define “prime?”**

202 A. Each of the approximately 800 soil types in Illinois is assigned a PI. The optimum PIs
203 vary in value from a low value of 47 to a high value of 147, which represents the highest quality.
204 The term “prime” is a general term used to refer to higher quality farmland. It is further refined
205 into three classes, based on the optimum PI. The prime classes and the PI range associated with
206 each are as follows:

207

208 Class A for PIs of 133-147,
209 Class B for PIs of 117-132, and
210 Class C for PIs of 100-116.

211

212 Soils with an optimum PI of less than 100 are not considered “prime.” This information is
213 readily available – see 2013 Illinois Farmland Values and Lease Trends, Published by the Illinois
214 Society of Professional Farm Mangers and Rural Appraisers, page 15.

215

216 **Q. Please describe the process you used to determine the quantity and quality of**
217 **farmland in the 150-foot easement for both the Channon Hybrid Route and the MCPO**
218 **route.**

219 A. Mapping software was used to determine the total acres present for each optimum PI
220 represented by the soils in the route easement area. Segments along the path of the route were
221 bounded by a rectangular drawing, 150-foot wide and generally the length of a township. The
222 Channon Hybrid Route was mapped from the Staff Option 1 proposed substation site to the
223 Kansas substation. The MCPO route was mapped from the ATXI proposed substation site to the
224 Kansas substation. I used maps provided by Surety™ Customized Online Mapping, ©Agri
225 Data, Inc. 2012. Field borders were provided by Farm Services Agency as of 5/21/2008. Aerial
226 photography was provided by Aerial Photography Field Office. Soils data was provided by
227 University of Illinois at Champaign-Urbana. Table: Optimum Crop Productivity Ratings for
228 Illinois Soil by K. R. Olson and J. M. Lang, Office of Research, ACES, University of Illinois at
229 Champaign-Urbana, Version: 1/2/2012, Amended Table S2 B811 (Updated 1/10/2012).

230

231 **Q. What was determined to be the quantity and quality of farmland in the easement**
232 **area for the Channon Hybrid Route and the MCPO route?**

233 A. PDM Ex. 6.4 shows that the Channon Hybrid Route includes 1113 acres of land in the
234 easement of which 1088 acres (98%) are prime. The same exhibit shows the MCPO route
235 includes 1258 acres in the easement of which 1238 acres (98%) are prime. Thus, the MCPO
236 route traverses through 150 more acres of prime land. For the Class A component of prime, the
237 Channon Hybrid Route easement includes 830 acres, while the MCPO route easement includes
238 979 acres. Thus, the MCPO route easement covers 149 more acres of Class A farmland than the
239 Channon Hybrid Route.

240
241 **Q. Does this analysis raise questions relating to previously reported data?**

242 A. Yes. PDM Ex. 6.5 summarizes the cultivated and prime acres reported by MCPO in the
243 MCPO route (MCPO Ex. 2.3, pages 1 - 2) and reported by ATXI in the ATXI Primary and
244 Alternate Routes (ATXI Ex. 4.5, pages 1 - 2) for a 500-foot corridor. In DR Channon-MCPO
245 1.02(a) MCPO states that MCPO used the ATXI definition of “prime.” Although MCPO
246 reported that its route contains more cultivated cropland, MCPO stated that its route contains less
247 prime land than either ATXI route. Again, this does not fairly and accurately reflect the realities
248 of the farmland in the MCPO corridor. The mapping analysis confirms that 98% of all these
249 route’s easement areas are “prime” farmland. This is true whether you use a 500-foot corridor, a
250 150-foot easement area, or just the tower footprint. Ninety-eight percent (98%) of this land is
251 prime, and therefore a longer route will necessarily involve more prime farmland than a shorter
252 route. MCPO’s claim that its route affects fewer prime acres than ATXI’s routes is simply false

253 when the University of Illinois standards and the practices of the Illinois Society of Professional
254 Farm Managers and Rural Appraiser are considered.

255

256 ROADS, SECTION LINES, AND PROPERTY LINES

257 **Q. Have you compared the Channon Hybrid Route and the MCPO route in terms of**
258 **how each follows roads, section lines and property lines?**

259 A. Yes. PDM Ex. 6.6 summarizes this data for the Channon Hybrid Route. This route
260 follows roads, section lines and ½ section lines coinciding with property lines for 73% of the
261 route. Another 9% of the route follows property lines although those property lines do not
262 coincide with roads, section or ½ section lines. The route bisects only 28 properties.

263

264 **Q. How does your analysis compare with ATXI's analysis?**

265 A. ATXI's responses to DR 1.01(j) and DR 1.02(j) are consistent with my analysis.

266

267 **Q. How does the MCPO route compare?**

268 A. PDM Ex. 6.7 summarizes this data for the MCPO route. First, results are reported for the
269 segment of the route that does not parallel existing transmission lines. This segment of the
270 MCPO route follows roads, section lines and ½ section lines coinciding with property lines for
271 only 34% of the route. Another 16% of this segment follows property lines although those
272 property lines do not coincide with roads, section or ½ section lines. This segment bisects 80
273 properties.

274

275 Results are then reported for the entire MCPO route which includes the segment using parallel
276 routing. The route follows roads, section lines and ½ section lines coinciding with property lines
277 for only 40% of the route. Another 13% of the route follows property lines although those
278 property lines do not coincide with roads, section or ½ section lines. In addition to the 80
279 bisected properties previously reported, all properties along the approximate 5.5 mile long
280 diagonal of parallel routing are bisected.

281

282 **Q. What are your conclusions from this analysis?**

283 A. Based on public input during meetings held by ATXI, ATXI witness Donell Murphy
284 testified that agricultural use areas were rated as having the highest sensitivity at 47% (ATXI Ex.
285 4.3 (Part 1 of 5) page 8). Agricultural use areas were rated even higher than existing residences
286 (rated at 35%) and wooded areas (rated at 3%).

287

288 Based on public input during the same meetings, opportunities to parallel roads were rated at
289 57%, and to parallel property lines were rated at 34% (ATXI Ex. 4.3 (Part 1 of 5) page 8).

290

291 Based on this analysis and Ms. Murphy's testimony, the ATXI route segments comprising the
292 Channon Hybrid Route reflect an attempt by ATXI to respect public input and eliminate as much
293 as possible the splitting of farm properties. On the other hand, the MCPO route does not fairly
294 reflect public input. This is consistent with what Donell Murphy testified:

295 *ATXI Exhibit 13.0, page 53, lines 1143-1150*

296 **Q. Why do the alternatives proposed by MCPO not present viable alternatives for**
297 **the Mt. Zion-Kansas portion of the Project?**

298 A. *As discussed above, the alternatives identified by MCPO between Mt. Zion and*
299 *Kansas do not appear to have been developed with equal and non-subjective*
300 *consideration of all environmental routing criteria evaluated within ATXI's route siting*
301 *analysis. They do not fairly reflect public input. They extend outside of ATXI's study*
302 *area, on the basis only that doing so will increase geographic diversity, though the land*
303 *use and geography within MCPO's study area is no different than within ATXI's.*

304

305 Even excluding the miles of route parallel to existing transmission lines, the MCPO route cuts
306 through 27 miles of farmland splitting 80 farm properties, of which 98% of the acres are prime,
307 and of which 78% are Class A prime, some of the best farmland in Illinois.

308

309 **Q. Why does the MCPO route split so many more farms than the ATXI routes?**

310 A. Under cross examination witness Reinecke was asked how many parcels and how many
311 landowners are affected by the MCPO route, apparently a route for which he had major design
312 responsibility.

313 *Reinecke cross on 05/15/2013, page 616, lines 20-22; page 617, lines 1-12*

314 **Q. How many parcels of land does your easement area for the route from Mt. Zion**
315 **to Kansas cross?**

316 A. *I do not know.*

317 **Q. Who would know that, if not you?**

318 MR. ROBERTSON: *I'm sorry. Can you speak up a little bit? I don't hear so well*
319 *anymore. Your voice is very soft.*

320 MR. WILKE: *I asked him who would know that if not him since he designed the route.*

321 *THE WITNESS: I don't know that anybody would at this point.*

322 **Q. How many landowners are affected by the easement area for the Mt. Zion to**
323 **Kansas route that you're proposing?**

324 **A. I do not know.**

325

326 A readily available source for determining individual property boundaries for tracts of farmland
327 and ownership of those tracts is the plat books published for Illinois counties and detailing this
328 information by township. Based on witness Reinecke's response, it appears that source material
329 delineating property boundaries was not utilized during MCPO's design process. Without
330 knowledge of where property lines are located, a route designer cannot possibly follow property
331 lines.

332

333 **Q. Is there an additional way route design can negatively impact farmland that is**
334 **relevant to a comparison of the Channon Hybrid Route and MCPO route?**

335 **A. Yes.** The placement of electric transmission towers upon farmland negatively impacts
336 the ease of farming. Further impact results when turns, especially severe turns, are placed
337 within the boundaries of a single tract. Ease of farming translates into economic benefit for a
338 landowner. As stated in the 2013 Illinois Farmland Values and Lease Trends, Published by the
339 Illinois Society of Professional Farm Managers and Rural Appraisers, at page 17, "Good
340 productivity farms that are square or rectangular with few easements or obstructions, such as
341 electric towers, remain competitive with higher productivity tracts."

342

343 The Agricultural Impact Mitigation Agreement addresses the requirement to minimize the
344 placement of transmission poles upon agricultural land (ATXI Ex. 5.2 p. 3 par 1(B)). The
345 number and placement of poles affect the amount of land taken out of production. The practice
346 of placing severe turns, especially two such turns, within a single farm tract should raise
347 compliance issues with this requirement of the Mitigation Agreement.

348

349 The ATXI route maps (ATXI Ex. 4.2) that display the segments used for the Channon Hybrid
350 Route show no occurrences of 90-degree (dead end) turns within the boundaries of single farm
351 tracts. On the other hand, the MCPO route maps (MCPO Ex. 2.2, Part 1, pages 1-7; Part 2,
352 pages 8-14; Part 3, pages 15-20) show 12 instances of turns within the boundaries of farm tracts.

353

354 **Q. What conclusions have you drawn from examining the MCPO placement of severe**
355 **turns within a single farm tract?**

356 A. The apparent reason for the MCPO zigzag design is to avoid some entity in the
357 immediate path of the route but, in the process, property lines are disregarded, resulting in the
358 splitting of farm properties.

359

360 To demonstrate, a few examples are noted as seen on the January 2, 2013 route map (MCPO
361 Corrected Ex. A, pages 1 - 7) and the March 29, 2013 route map (MCPO Ex. 2.2, Part 1, pages
362 1-7; Part 2, pages 8-14; Part 3, pages 15-20). The January map shows the route on
363 approximately the same latitude as the Tuscola Airport runway. It appears that in an attempt to
364 skirt this situation, two 90-degree turns are placed on a single tract approximately two miles to
365 the west. As a second example, when compared to the January route map, the March route map

366 shows a new path for the route above LaPlace in Piatt County, Cerro Gordo Township. The
367 change in routing, apparently to avoid a residence or two, results in this “refined” route no longer
368 following a road but instead, turning north, then turning east and cutting across an additional six
369 miles of prime, Class A farmland, splitting 16 of the 18 properties in its path.

370

371 Apparently, the modification at LaPlace resulted in the route being too close in proximity to the
372 Hammond Cemetery and a small residence. In order to avoid this problem, it appears that
373 MCPO added two additional 90-degree turns within one farm tract, resulting in moving the route
374 off the quarter-section line. From this point, the route continues across the remainder of Piatt
375 County, again cutting across six miles of prime, Class A farmland, and again splitting another 16
376 properties.

377

378 INTERVENOR SUPPORT FOR THE CHANNON HYBRID ROUTE

379

380 **Q. Which intervenor groups are aligned with the Channon Hybrid Route?**

381 A. Tarble Limestone Enterprises, Coles County Landowners, Reed Interests and Coles and
382 Moultrie County Land Interests all stated support for the ATXI Alternate Route as that route
383 affects their interests in Coles County and southeastern Moultrie County. The Channon Hybrid
384 Route uses the ATXI Alternate Route in this area, and therefore aligns with these intervenors’
385 interests.

386

387 The Coalition of Property Owners and Interested Parties in Piatt, Douglas and Moultrie Counties
388 (PDM) and the Channon Family Trust both support the Channon Hybrid Route.

389

390 ATXI, notwithstanding its stipulation, has filed the routing which comprises the Channon Hybrid
391 Route, and ATXI has testified extensively in support of that routing.

392

393 The Village of Mt. Zion and the Macon County Property Owners have both indicated that they
394 do not want 345kV lines running near the Village of Mt. Zion, and their interests therefore
395 appear to be aligned with the Channon Hybrid Route.

396

397 **Q. How many members belong to the Coalition of Property Owners and Interested**
398 **Parties in Piatt, Douglas and Moultrie Counties?**

399 A. The PDM supplemental appearance filed earlier this week confirms that in addition to the
400 36 original members of the PDM intervenor group identified in PDM's Petition to Intervene, 429
401 additional members have joined PDM, bringing the total number of property owners and
402 interested parties in PDM to 465.

403

404

CONCLUSION

405

406 **Q. What are your conclusions regarding your comparison of the Channon Hybrid**
407 **Route and the MCPO route for the Mt. Zion to Kansas segment?**

408 A. The Channon Hybrid Route provides a net reduction in impact while the MCPO route
409 results in a net increase in impact. The Channon Hybrid Route is shorter and results in a lower
410 dollar cost. The Channon Hybrid Route follows a more direct route to the south and east rather
411 than traveling off-course to the north. The Channon Hybrid Route's shorter length translates into

412 less environmental impact such as affecting fewer acres of prime (and Class A) farmland. The
413 Channon Hybrid Route splits significantly fewer farm tracts and avoids placing turning
414 structures in the middle of farm fields. The Channon Hybrid Route satisfies all intervenor
415 concerns excepting only those of MCPO, which simply objects to any route within Moultrie
416 County.

417

418 **Q. Do you conclude that the Channon Hybrid Route supports the Staff and**
419 **Commission position?**

420 A. The Channon Hybrid Route supports the Staff's and the Commission's stated desire to
421 move the Mt. Zion substation further south. It supports the Staff's preferred substation site and
422 is consistent with Staff's placement of the Mt. Zion substation on the ATXI Primary Route to
423 Kansas. The Channon Hybrid Route supports the Commission's mandate in that it is the least
424 cost and most efficient route.

425

426 **Q. Does this complete your testimony?**

427 A. Yes.

AFFIDAVIT

STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

I, MARY BURNS, after first being duly sworn on oath, depose and state that the testimony I have given is true and correct.

Mary Burns
Mary Burns

SUBSCRIBED and SWORN TO before me
this 12th day of November, 2013.

Adrienne Cappelli Ettinger
Notary Public

