

**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 8-503 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

MOTION FOR CLARIFICATION

Tarble Limestone Enterprises (“Tarble”), Coles County Landowners (“CCL”) and the Reed Interests (“Reed”) move for entry of an order clarifying that the only potential transmission line routes that may be addressed in rebuttal or surrebuttal testimony or the evidentiary hearing in this case are either routes approved in the August 20, 2013 Final Order routes identified in the applications for rehearing and related direct testimony, or routes identified by ICC Staff in response to the directive in the Final Order. In support of their motion, the movants attach the Affidavit of Edward R. Gower. In further support of their motion, movants state:

1. Tarble, CCL and Reed all own land in southeastern Coles County on which the original Primary Route in the segment between the Mt. Zion and Kansas substations is located.
2. The ATXI/MCPO Stipulated Route that was approved in the Final Order for the eastern part of the Mt. Zion to Kansas substations segment is not located on the movants’ land and would not use that land for construction of the transmission line.
3. No rehearing applicant has proposed in a rehearing application, or recommended in direct testimony, that the route for the transmission line be located on ATXI’s Primary Route in southeastern Coles County where it would cross the movants’ property.

4. The route proposed by ICC Staff pursuant to the directive in the Final Order does not propose locating the transmission line on the movants' property.

5. However, given the uncertainty over the scope of permissive rebuttal testimony concerning the Mt. Zion to Kansas segment, it is conceivable although unlikely that a party might propose a route that uses the Primary Route where it crosses the movants' property even though such a route was not approved in the Final Order, proposed by any rehearing applicant, or proposed by Staff in response to the directive in the Final Order.

6. Tarble has acquired additional property rights since Jerald Tarble submitted direct testimony on March 29, 2013 that further supports Mr. Tarble's testimony that the costs of the Primary Route are understated in the estimates provided by Ameren Transmission Company of Illinois ("ATXI"). Tarble also has continued its quarrying business since direct testimony was submitted in March, including quarrying under property that is on the Primary Route in southeastern Coles County.

7. Absent some clarification as to the scope of permissible testimony, Tarble will file rebuttal testimony to protect its interests because it does not know whether any other party will advocate use of its property, and Tarble, CCL and Reed will be forced to review all other parties' rebuttal testimony and continue to participate in this case, including possible participation at the hearing.

8. An order clarifying that the only permissible routes that may be addressed in rebuttal and surrebuttal testimony or the evidentiary hearing are routes approved in the August 20, 2013 Final Order, proposed in rehearing applications or related direct testimony, or proposed by ICC Staff in response to the Commission's directives in the Final Order will reduce expense to and the emotional toll on the movants and perhaps other parties similarly situated, and is in the

