

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	:	No. 12-0598
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.	:	

**RESPONSE TO MOTION FOR CLARIFICATION**

COME NOW the Moultrie County Property Owners (“MCPO”) by their attorneys, Lueders, Robertson & Konzen, and for their response to the Motion for Clarification of Tarble Limestone Enterprises, et al., (“Tarble”) state as follows:

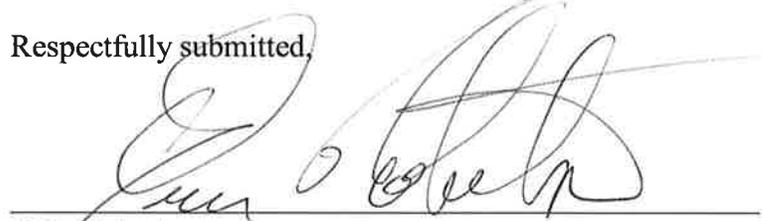
1. That MCPO is sympathetic to the Tarble Motion for Clarification. However, granting such a Motion without qualification has unintended consequences and therefore, the Motion should not be granted without qualification.
2. In this case the Commission has determined that one of the subjects on rehearing is the location of the Mt. Zion substation and the transmission routing to and from potential substation sites to and from the transmission routes proposed in this case.
3. The Illinois Commerce Commission Staff has proposed three alternative substation locations in its direct testimony on rehearing in this case. Routing to and from these substation locations to proposed routes from Mt. Zion to Kansas is an issue yet to be determined in the case.
4. There are specific routing proposals now on the table in this case that could be used alone

or in combination with one another to gain access to the different Mt. Zion substation locations identified in the Staff's direct testimony on rehearing from the various routes that have actually been proposed.

5. No party should be prohibited from suggesting or recommending combinations of existing routing proposals for connecting the suggested substation locations to any of the routes previously identified in this case.

WHEREFORE, MCPO respectfully requests that the Motion only be approved if other parties are not prohibited from making routing proposals that are consistent with and may incorporate elements of one or more existing routing proposals in the record as they may relate to connecting those routes to the location of the Mt. Zion substation.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Eric Robertson', is written over a horizontal line. The signature is fluid and cursive.

Eric Robertson  
Lueders, Robertson & Konzen  
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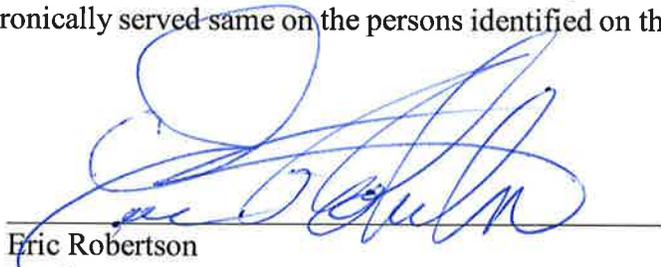
79557.1

**PROOF OF SERVICE**

STATE OF ILLINOIS       :  
                                  :  
                                  :  
COUNTY OF MADISON    :

SS

I, Eric Robertson, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for the Moultrie County Property Owners, herewith certify that I did on the 20th day of November, 2013 electronically file with the Illinois Commerce Commission the Response to Motion for Clarification of MCPO, and electronically served same on the persons identified on the Commission's official service list.



Eric Robertson  
Lueders, Robertson & Konzen, LLC  
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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 20th day of November, 2013.



Notary Public