

**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)	Docket No. 12-0598
to Section 8-503 of the Public Utilities Act, to)	(on Rehearing)
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.)	

PETITION FOR LEAVE TO INTERVENE

Pursuant to Section 200.200 of the Rules of Practice of the Illinois Commerce Commission ("Commission"), 83 Ill. Adm. Code 200.200, Eric and Julia Sprague ("Intervenors"), by their attorneys, Shay Kepple Phillips, Ltd., file this Petition for Leave to Intervene ("Intervention"), and seek authority thereby to intervene and participate fully as a party in the above-captioned proceeding. In support of their Intervention Intervenors state as follows:

1. Intervenors reside and own property at 2378 E. 1900 North Rd., Moweaqua, IL 62550. Their property, consisting of approximately 32.5 acres of timber land and 2 acres on which their residence lies, is located on and along a portion of the Pana to Mt. Zion segment of the route that Ameren Transmission Company of Illinois ("AXTI") is proposing on rehearing in this matter for its Illinois Rivers Project transmission line ("Transmission Line"). AXTI's intent to locate its Transmission Line along said route is evidenced by its prepared direct testimony on rehearing dated

November 13, 2013. A map showing Intervenors' property is attached hereto and incorporated herein as Sprague Ex. 1.1.

2. In response to the Commission's directive and the notice of Administrative Law Judge Albers on October 2, 2013, Commission Staff identified a transmission line route between Pawnee and Mt. Zion (via Kincaid) on October 16, 2013. Staff witness Rockrohr also offered testimony in support of said route in his written direct testimony on rehearing dated November 13, 2013. ICC Staff Exhibit 2.0, lines 123 – 314.

3. In the event the Commission's Order on Rehearing incorporates the Pawnee to Mt. Zion route for the Transmission Line, Intervenors' property will not be impacted. Consequently, Intervenors support said route.

4. In the event the Commission instead adopts AXTI's proposal for the Pawnee to Mt. Zion segment of the Transmission Line, and selects as the route for the Pana to Mt. Zion segment the route AXTI proposes, then Intervenors' property would be directly impacted. Specifically, most of the Pana to Mt. Zion segment route which AXTI proposes runs in a northerly direction alongside an existing 138kV transmission line. Just south of 1900 Road, however, the route turns in a westerly direction for a short distance, then turns back to the north where it passes on and along Intervenors' property, then turns to the east until it returns to and resumes its northerly route alongside the 138kV line. Two maps showing the portion of said segment, one of which is in the record in this proceeding as AXTI Exhibit 4.2 (Part 61 of 100), and the other of which is shown at p. 14 of Donell Murphy's direct testimony on rehearing, ATXI Exhibit 3.0 (RH), are attached hereto and incorporated herein as Sprague Exhibit 1.2.

5. Intervenor are prepared to file prepared testimony on December 2, 2013, the date set for rebuttal testimony to be filed, in support of their position that the Transmission Line should not be routed on and along their property, and will propose an alternative route for this relatively short portion of the Transmission Line segment that Intervenor believe better satisfies the routing criteria established in this proceeding.

6. Intervenor are therefore interested in the subject matter of this proceeding and may be affected by any order entered or other relief granted by the Commission.

7. No other party is able adequately to represent or protect the interests of the Intervenor.

8. No party will be unduly prejudiced by Intervenor's intervention and offering of testimony on the rebuttal testimony date, and their participation as parties in this proceeding. AXTI witnesses will have full opportunity to respond to Intervenor's position and testimony in their surrebuttal testimony to be filed on December 10, 2013.

9. Intervenor agree to accept service by electronic means as provided in Section 200.1050 of the Commission's Rule of Practice, 83 Ill. Adm. Code 200.1050.

10. Copies of all pleadings, notices, correspondence and other documents in this Docket should be sent to:

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11. Pending a ruling on this Petition for Leave to Intervene, Intervenors respectfully request that the Administrative Law Judge permit them to participate in this proceeding.

WHEREFORE, Eric and Julia Sprague respectfully request leave to intervene and to participate as a party in this proceeding.

Dated: November 25, 2013

Respectfully submitted,

By: 
William M. Shay
One of the Attorneys for Eric
and Julia Sprague

Attorneys for Intervenors:

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STATE OF ILLINOIS)

COUNTY OF PEORIA)

Verification

I, William M. Shay, being first duly sworn, hereby state that I am an attorney representing Eric and Julia Sprague, that I have read the foregoing Petition for Leave to Intervene and am familiar with its contents, and that the same are true and correct to the best of my knowledge, information and belief.

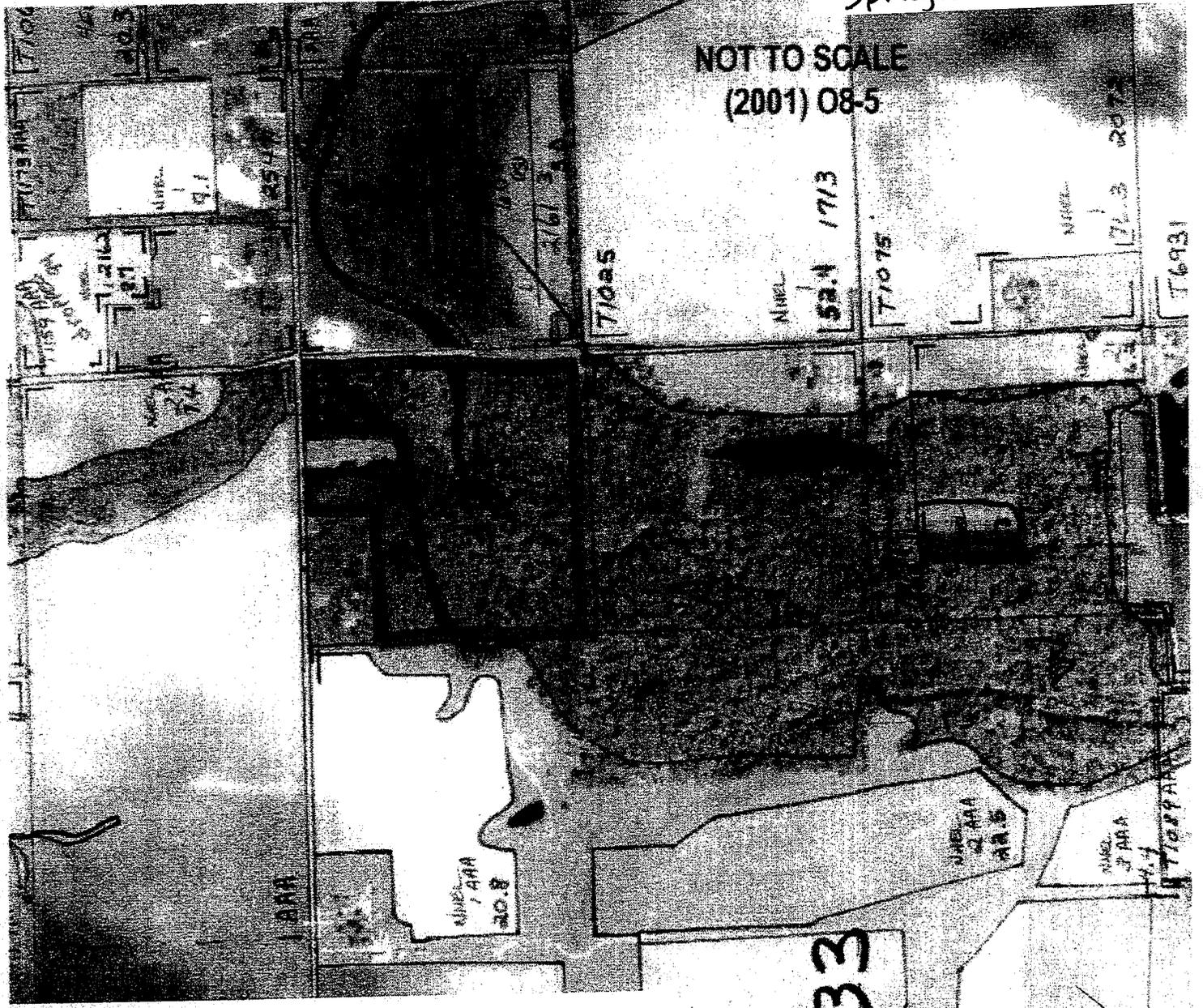
William M. Shay

Subscribed and Sworn to
Before me this 25th day of
November, 2013

Mardona K. Shay
Notary Public



NOT TO SCALE
(2001) 08-5



ERIC SPRAGUE

NE 1/4, NE 1/4 SEC. 33
T14N, R1E
CHRISTIAN COUNTY

—A UPLAND FOREST

—B BOTTOMLAND FOREST

↑ 34.5 acres
1" = 660'

AAA 20.8
AAA 21.8
AAA 22.8

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Figure 4.

