

**REBUTTAL TESTIMONY
OF
JUSTIN RAMEY AND ANN RAYNOLDS**

**Ameren Transmission Company of Illinois
Docket No. 12-0598 (Rehearing)
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.**

November 25, 2013

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ILLINOIS COMMERCE
COMMISSION

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1 **INTRODUCTION**

2 **Q. Please state your name(s).**

3 **A.** My name is Justin Ramey and my name is Ann Raynolds. Our property is located
4 at 1236 e 1000 North Road Taylorville, Illinois, 62568. This address is located on
5 ATXI's proposed alternate route 2 from Pawnee to Pana.

6 **Q. On whose behalf are you testifying?**

7 **A.** We are testifying on behalf of ourselves, Justin Ramey and Ann Raynolds. From
8 this point forward, "we" and "us" shall represent Justin Ramey and Ann Raynolds.

9 **Q. Are you an intervenor in this hearing?**

10 **A.** Yes. We became intervenors on February 8, 2013.

11 **PURPOSE AND SCOPE**

12 **Q. What is the purpose of your rebuttal testimony on this rehearing?**

13 **A.** The rebuttal testimony addresses three topics:

- 14 1) Rebuttal to Staff's identified route between Pawnee and Mt. Zion via
15 Kincaid
16 2) Rebuttal to ATXI's proposed route Alternate Route 2 from Pawnee to Pana
17 3) Stipulation to ATXI's proposed route from Pawnee to Pana if chosen

18 **Q. Are you sponsoring any exhibits in your testimony?**

19 **A.** Yes. We sponsor the following:

- 20 • Raynolds/Ramey Exhibit 1.1 Raynolds/Ramey segment

21 **RESPONSE TO STAFF'S PAWNEE TO MT. ZION VIA KINCAID ROUTE**

22 **Q. What is your rebuttal to Staff's identified route from Pawnee to Mt. Zion via**
23 **Kincaid?**

24 A. We are in full support of Staff's proposed route from Pawnee to Mt. Zion via
25 Kincaid and believe it to be the least cost option and best alternative route for this
26 segment of the Illinois Rivers Transmission Project (based on twelve criteria to
27 evaluate routes set by Commission).¹

28 **Q. Do you feel that testimony given by Staff and ATXI has addressed all**
29 **possible configurations of the route from Pawnee to Mt. Zion via Kincaid?**

30 A. While we are in full support of Staff's proposed Pawnee to Mt. Zion via Kincaid
31 route, as part of our testimony, we would like to request clarification on the necessity
32 of a connection at the existing Kincaid substation. We feel that clarification of this
33 configuration will complete a comprehensive analysis of Staff's proposed route.

34 As stated in Mr. Kramer's testimony² on behalf of ATXI, dated November 13, 2013,
35 there are concerns with the technical capacities and the necessity of upgrades at the
36 Kincaid substation if this substation is used as a component of the proposed Staff
37 line. We question if Mr. Kramer's concerns could be fully negated if Staff's proposed
38 345 kV route consisted of a direct connection between the approved Pawnee
39 substation site and a Staff proposed Mt. Zion substation. As part of ATXI's proposed
40 alternate routes between Pawnee and Pana, the approved Pawnee substation site
41 should hypothetically be capable of supplying sufficient and reliable power to a
42 hypothetical Pana substation. This hypothetical capacity should then suggest that a
43 newly constructed and configured Pawnee substation should also be fully capable of
44 providing a sufficient and reliable 345 kV connection between the Pawnee and Mt.

¹Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

² Direct Testimony on Rehearing of Dennis D. Kramer submitted on Behalf of ATXI, November 13, 2013, p. 5

45 Zion substations.

46 **Q. Would a direct connection between the Pawnee and Mt. Zion substations**
47 **require the proposal of a new route?**

48 **A. Not to our knowledge, although we suspect that slight route modifications might**
49 **be necessary in order to bypass the existing Kincaid substation and the adjacent**
50 **power plant.**

51 **Q. Would a direct connection between the Pawnee and Mt. Zion substations**
52 **require more transmission line and increase construction costs?**

53 **A. Based on Staff's November 13, 2013 testimony³, our understanding is that a**
54 **direct connection between the Pawnee and Mt. Zion substations would require 5.2**
55 **additional miles of 345 kV line (when compared to Staff's utilization of 5.2 miles of**
56 **existing 345 kV line between Pawnee and Kincaid). However, a direct connection**
57 **between Pawnee and Mt. Zion would eliminate Mr. Kramer's: technical concerns,**
58 **reliability concerns, and the need for \$1.5 million in upgrades (cost to Illinois Ameren**
59 **customers) to the Kincaid substation.⁴ The direct connection between the Pawnee**
60 **and Mt. Zion substations would require a total of 46.2 miles of new transmission line;**
61 **19.9 fewer miles than the 66.1 miles required for the ATXI proposed Pawnee to Mt.**
62 **Zion via Pana route.⁵ Based on figures in exhibit 1.6 of Mr. Kramer's testimony⁶ we**

³ Direct Testimony of Greg Rockrohr submitted November 13, 2013, p. 8

⁴ Direct Testimony on Rehearing of Dennis D. Kramer submitted on Behalf of ATXI, November 13, 2013, ATXI Exhibit 1.6

⁵ The Pawnee-Pana segment would require approximately 32.3 miles of new 345 kV transmission line, and the Pana-Mt. Zion segment approximately 33.8 miles: a total length of 66.1 miles of new 345 kV transmission line. The alternative route that Staff submitted between Pawnee and Mt. Zion (via Kincaid) would require approximately 41 miles of new 345 kV transmission line. Direct Testimony of Greg Rockrohr submitted November 13, 2013, p. 8

⁶ Direct Testimony on Rehearing of Dennis D. Kramer submitted on Behalf of ATXI, November 13, 2013, ATXI Exhibit 1.6

63 derive that 5.2 additional miles of transmission line would cost approximately \$1.02
64 million, \$480,000 less than the \$1.5 million needed for a connection at the Kincaid
65 substation. This offset in cost strengthens the proposal of a direct Pawnee to Mt.
66 Zion route as the least cost alternative while negating Mr. Kramer's technical
67 concerns associated with the utilization of the Kincaid substation.

68 **Q. Is there any further rebut needed in regards to testimony submitted by Staff**
69 **or ATXI regarding the Pawnee to Mt. Zion via Kincaid route?**

70 A. We would like to rebut Mr. Kramer's testimony⁷ submitted on behalf of ATXI
71 stating that a new Pana substation should be approved as part of the Illinois Rivers
72 Transmission Project and that a new 345 kV transmission line should be constructed
73 to the Pana substation. First and foremost, a 345 kV line between Pawnee and Pana
74 already exists and we believe that ATXI has failed to present sufficient evidence to
75 substantiate the need for an additional 345 kV line that originates from the same
76 geographical area. Essentially, Mr. Kramer's argument is that the construction of an
77 additional 345 kV line would be necessary to obtain cost share assistance for a new
78 Pana substation. While we acknowledge Mr. Kramer's argument and ATXI's need to
79 address issues at the current Pana substation, we do not feel that the desire for cost
80 share substantiates the necessity of an additional 345 kV line in an area where one
81 already exists, nor do we believe sufficient evidence has been presented that
82 describes a new Pana substation as an essential component of the Illinois Rivers
83 Transmission Project. As noted in staff's testimony⁸, a 345 kV connection to the

⁷ Direct Testimony on Rehearing of Dennis D. Kramer submitted on Behalf of ATXI, November 13, 2013, p. 5

⁸ Direct Testimony of Greg Rockrohr submitted November 13, 2013, p. 10

84 Pana substation via the Mt. Zion substation would still be a viable option of future
85 development. However, we do not feel sufficient evidence has been presented that
86 warrants Pana substation maintenance as a necessary component of the Illinois
87 Rivers Transmission Project.

88 **RESPONSE TO ATXI's PROPOSED ALTERNATE ROUTE 2 FROM PAWNEE TO**

89 **PANA**

90 **Q. Have you submitted prior testimony in regards to the proposed ATXI**
91 **alternate route 2 from Pawnee to Pana?**

92 A. No. ATXI did not notify us as potentially affected landowners in the Illinois Rivers
93 Transmission Project. This absence of notice allowed insufficient time to develop
94 and file testimony before today. However, detailed concerns were conveyed via
95 public comments that were acknowledged in the Commission's final order on August
96 20, 2013.

97 **Q. Do you support ATXI's proposed alternate route 2 from Pawnee to Pana in**
98 **its currently proposed configuration?**

99 A. No. As previously stated above, a 345 kV line between Pawnee and Pana already
100 exists and we believe that ATXI has failed to present sufficient evidence to
101 substantiate the need for an additional 345 kV line. Mr. Kramer argued that the
102 construction of an additional 345 kV line between Pawnee and Pana would be
103 necessary to obtain cost share assistance for a new upgraded Pana substation.
104 While we acknowledge Mr. Kramer's argument and ATXI's need to address issues at
105 the current Pana substation, we do not feel that the desire for cost share
106 substantiates the necessity of an additional 345 kV line in an area where one already

107 exists, nor do we believe sufficient evidence has been presented that describes a
108 new Pana substation as an essential component to a reliably functioning Illinois
109 Rivers Transmission Project. Also, as stated previously, we believe that the Staff's
110 proposed Pawnee to Mt. Zion via Kincaid route is the least cost option and best
111 alternative route for this segment of the Illinois Rivers Transmission Project (based
112 on twelve criteria to evaluate routes set by Commission⁹). Furthermore, we feel that
113 insufficient time was available to landowners (before the Commission's final August
114 20, 2013 ruling) to provide proper testimony regarding additional segment options on
115 ATXI's alternate route 2.

116 **Q. Are you proposing a segment option for this route?**

117 **A. Yes.** We believe that without the inclusion of the following Raynolds/Ramey
118 proposed segment option, ATXI's alternate route 2 from Pawnee to Pana fails to fully
119 represent a least cost configuration that adequately addresses the Commission's
120 twelve criteria¹⁰. In response to this, our recommended segment option for this route
121 is shown as Exhibit 1.1 and is hereafter referred to as the Raynolds/Ramey
122 segment. The relevant portion of ATXI's Alternate Route 2 from Pawnee to Pana
123 was depicted under this name on the Illinois Rivers Transmission website as of
124 January 3, 2013¹¹ and will hereafter be referred to as ATXI's Alternate Route 2.
125 ATXI's Alternate Route 2, without the Raynolds/Ramey segment modification, runs
126 roughly west to east from Illinois 48 to a corner structure approximately 0.5 miles

⁹ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

¹⁰ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

¹¹ Ameren Illinois Rivers Project proposed Routes Christian County
<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained
9/16/2013.

127 east of 1250 East Road. Along this west to east segment, ATXI's alternate route 2
128 transects an existing 345 kV line and then parallels 1000 North Road for
129 approximately 2.23 miles between 1075 East Road (a short segment road
130 connecting 1025 North and 1000 North Road) and 0.5 miles east of 1250 East Road.
131 ATXI's alternate route 2 utilizes a corner structure 0.5 miles east of 1250 East Road
132 and turns south to parallel an existing 138 kV line for approximately 1 mile between
133 1000 North Road and 900 North road where it again intersects the existing 345 kV
134 line (ATXI's route parallels the 138 kV line for approximately 0.82 miles before it
135 continues on to 900 North Road). The Raynolds/Ramey segment would eliminate 2
136 transmission line spans of ATXI's alternate route 2: one 2.78 mile span along 1000
137 North Road, and one 1 mile span that parallels the 138 kV line between 1000 North
138 road and 900 North Road. As shown in exhibit 1.1, the Raynolds/Ramey segment
139 would instead, intersect and parallel ATXI's existing 345 kV transmission line for
140 2.94 miles between the northwest quarter of T12N, R2W, section 17 and the
141 southeast quarter of T12N, R2W, section 15 where it would rejoin ATXI's proposed
142 alternate route 2.

143 **Q. Have you attempted to use the criteria that the Commission identified in its**
144 **August 20, 2013, Final Order¹² to compare the Raynolds/Ramey segment to**
145 **ATXI's Alternate route 2?**

146 **A. Yes, the following is the list of twelve criteria set forth by the Commission in the**
147 **ruling on August 20, 2013 used to compare the Raynolds/Ramey segment to ATXI's**
148 **Alternate route 2.**

¹² Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

149 **1. Length of Line**

150 The Raynolds/Ramey segment is 2.94 miles long; 0.84 miles shorter than
151 ATXI's proposed alternate route 2.

152 **2. Difficulty and Cost of Construction**

153 The Raynolds/Ramey segment would be the least cost option for this portion
154 of ATXI's proposed alternate route 2 and the inclusion of the
155 Raynolds/Ramey segment would reduce the total cost associated with ATXI's
156 alternate route 2. The difficulty and cost of construction for the
157 Raynolds/Ramey segment would be less than the respective portion of
158 ATXI's alternate route 2 due to: shorter line length, the utilization of an
159 existing transmission line corridor, the necessity of fewer transmission line
160 structures, and ATXI's ability to maximize pole spacing on an
161 undeveloped/nonresidential route. The Raynolds/Ramey segment may also
162 be less expensive and easier to construct due to the elimination of 1 corner
163 structure (located approximately 0.5 miles east of 1250 East Road).¹³ Exhibit
164 1.1 would suggest fewer trees along the proposed Raynolds/Ramey segment
165 as well, which could further reduce project costs while expediting project
166 completion. We believe the Raynolds/Ramey segment delivers a significant
167 level of cost reduction for the Illinois Rivers Transmission Project and for
168 Ameren Illinois area customers by providing the least cost option for this
169 portion of ATXI's proposed alternate route 2.

¹³ Ameren Illinois Rivers Project proposed Routes Christian County
http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap_Christian obtained
9/16/2013.

170 **3. Difficulty and Cost of Operation and Maintenance**

171 We do not believe there would be an appreciable difference in the difficulty
172 and cost of operations and maintenance between the Raynolds/Ramey
173 segment and AXTI's alternate route 2.

174 **4. Environmental Impacts**

175 We are unaware of any significant impacts regarding the environmental
176 criterion for either route. However, as stated previously, an existing, already
177 disturbed transmission line corridor would be utilized as part of the
178 Raynolds/Ramey segment. Use of the existing corridor would limit or
179 eliminate the need to impact new and undisturbed habitat. Also, as stated
180 previously, exhibit 1.1 would suggest that fewer trees would need to be
181 removed along the proposed Raynolds/Ramey segment.

182 **5. Impacts on Historical Resources**

183 The Raynolds/Ramey residence and barn located at 1236 E 1000 North Road
184 were built in 1880 and plans are in place to restore these structures as
185 potential candidates for the National Register of Historic Places in Illinois.

186 **6. Social and Land Use Impacts**

187 Other than residences, the land use in this area is primarily agricultural. 1000
188 E North Road is a narrow, one lane country road that will require ATXI
189 support structures to be located on cultivated acres. Said cultivated acres do
190 not currently have any transmission lines or support structures on them and
191 related farming operations are currently uninhibited by transmission line
192 structures of any kind. Although the Raynolds/Ramey segment would also

193 require support structures on cultivated acres, these acres have already been
194 impacted by support structures present as part of existing 138 kV and 345 kV
195 transmission lines. Current farming operations on the cultivated acres of the
196 Raynolds/Ramey segment have also already been impacted due to the
197 presence of the existing transmission lines. No transmission structures on
198 the Raynolds/Ramey segment should be required in fields that are currently
199 without transmission line development. Furthermore, the Raynolds/Ramey
200 segment should affect fewer cultivated acres than ATXI's alternate route 2
201 due to: shorter line length, the need for fewer structures and the ability of
202 ATXI to maximize pole spacing due to the reduction or elimination of close
203 proximities to existing overhead lines and residences.

204 **7. Number of Affected Landowners and other Stakeholders and 8.**
205 **Proximity to Homes and other Structures**

206 The primary benefit of the Raynolds/Ramey segment is that it would avoid 5
207 affected residences by moving the 345 kV transmission line significantly
208 further from 5 homes located directly on or near 1000 North Road. More
209 specifically, ATXI's alternate route 2¹⁴ is proposed to pass very close (less
210 than 150 ft.) to at least 2 of the 5 affected residences on 1000 North Road,
211 one being the Raynolds/Ramey residence located at 1236 East 1000 North
212 Road. This type of impact to residences should be avoided without question
213 when there are other segment options available on this portion of ATXI's

¹⁴ Ameren Illinois Rivers Project proposed Routes Christian County
<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained
9/16/2013.

214 alternate route 2 that can provided the same 345 kV service at a lower cost
215 while also more efficiently meeting the Commissions twelve criteria.¹⁵ The
216 Raynolds/Ramey segment provides both of these benefits by providing a
217 lower cost alternative while simultaneously meeting the Commission's twelve
218 criteria¹⁶ far more comprehensively than ATXI's alternate route 2. The
219 superiority of the Raynolds/Ramey segment is further strengthened by the
220 fact that there are no affected residences within 1000 ft. of the
221 Raynolds/Ramey segment.

222 **9. Proximity to Existing and Planned Development**

223 We are unaware of any additional existing or planned development along
224 either route.

225 **10. Community Acceptance and 11. Visual Impact**

226 The Raynolds/Ramey segment would move the proposed ATXI alternate
227 route 2 transmission line a significant distance south, away from 5 residences
228 on or near 1000 North Road. As previously stated, ATXI's alternate route 2 is
229 proposed to pass very close (less than 150 ft.) to at least 2 of the 5 affected
230 residences on 1000 North Road¹⁷. Many safety and health concerns are
231 associated with and have been expressed through public comment in regard
232 to transmission structures and lines located within 150 ft. of residences. By
233 locating the 345 kV transmission line on the Raynolds/Ramey segment,
234 concerns related to safety and health impacts would be eliminated for

¹⁵ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

¹⁶ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

¹⁷ Ameren Illinois Rivers Project proposed Routes Christian County

<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.

235 residences located on this portion of the Illinois Rivers Transmission Project.
236 Furthermore, both the direct and indirect property devaluation of 5 residences
237 on or near 1000 North Road would be completely avoided on the
238 Raynolds/Ramey segment and the visual impact associated with the Illinois
239 Rivers Transmission Project would be virtually eliminated for said residences.
240 The Raynolds/Ramey segment will also parallel existing transmission lines in
241 an undeveloped area that lies at least 1000 ft. from any residence in Christian
242 County. Increased distances from the Illinois Rivers Transmission line and the
243 fact that transmission lines are already present along the Raynolds/Ramey
244 segment would suggest that no property devaluation will be imposed to
245 residences on the Raynolds/Ramey segment. The utilization of an existing
246 transmission line corridor in an undeveloped/nonresidential area would also
247 support our argument that the visual impact associated with high voltage
248 transmission lines on the Raynolds/Ramey segment is already present as
249 part of the existing transmission line system and this visual impact will not be
250 significantly compounded by the location of the Raynolds/Ramey segment.
251 As previously stated above, both the Raynolds/Ramey segment and ATXI's
252 alternate route 2 would need to utilize cultivated acres as part of their routes.
253 However, we also stated above that the Raynolds/Ramey segment should
254 affect fewer cultivated acres than ATXI's alternate route 2 due to: shorter line
255 length, the need for fewer structures and ATXI's ability to maximize pole
256 spacing due to the reduction or elimination of close proximities to existing
257 overhead lines and residences. With the above reasoning in mind, we are

258 confident to conclude that the Raynolds/Ramey segment would yield greater
259 community acceptance than ATXI's alternate route 2.

260 **12. Presence of Existing Corridors**

261 As previously described, the Raynolds/Ramey segment would utilize an
262 existing transmission line corridor and parallel 2.94 miles of existing
263 transmission line. Although ATXI has expressed reliability concerns
264 associated with paralleling existing transmission lines¹⁸, ATXI's own proposed
265 alternate route 2 between Pawnee and Pana will require paralleling for more
266 than 17 miles¹⁹ of existing transmission line. As previously stated, the
267 Raynolds/Ramey segment would eliminate 0.82 miles of ATXI's alternate
268 route 2 where it is proposed to parallel a 138 kV line between 1000 North
269 Road and 900 North Road. The Raynolds/Ramey segment would, however,
270 parallel 2.94 miles of existing 345 kV line but the segment would only
271 effectively add 2.12 miles of parallel transmission line to ATXI's alternate
272 route 2. While we understand ATXI's concerns with paralleling transmission
273 lines, we believe that these concerns are fully negated by the fact that ATXI's
274 proposed alternate route 2 also includes more than 17 miles of new line that
275 would parallel existing 138 kV and 345 kV line along an existing corridor. In
276 fact, the majority of these 17 plus miles of ATXI alternate route 2 lines are
277 proposed to parallel upstream portions of the same transmissions line
278 proposed to be paralleled in the Raynolds/Ramey segment. This fact further

¹⁸ Second Revised Rebuttal testimony of Donell Murphy ATXI exhibit 13.0 (2d. Rev), p.24

¹⁹ Ameren Illinois Rivers Project proposed Routes Christian County

<http://www.ilriverstransmission.com/Portals/23/Images/CountyOverviewMap> Christian obtained 9/16/2013.

279 negates ATXI's reliability concerns with paralleling existing transmission lines
280 on the Pawnee to Pana route.

281 **Q. Would you be in support of ATXI's alternate route 2 if the Raynolds/Ramey**
282 **segment was incorporated as a component of the approved route?**

283 **A. Yes. In its current configuration, we believe that ATXI's alternate route 2 from**
284 **Pawnee to Pana fails to fully represent a least cost configuration that adequately**
285 **addresses the Commission's twelve criteria²⁰. However, we believe that, through the**
286 **utilization of Commission's twelve criteria²¹, we have adequately established the**
287 **superiority of the Raynolds/Ramey segment when compared to the respective**
288 **portion of ATXI's alternate route 2. Therefore, if the Raynolds/Ramey segment**
289 **option was approved for the respective portion of ATXI's alternate route 2, we would**
290 **then believe the route to meet the Commission's twelve criteria²² and only then,**
291 **would we be in full support of the ATXI alternate route 2.**

292 **STIPULATION TO ATXI's ALTERNATE ROUTE 2 FROM PAWNEE TO PANA**

293 In the event that the Illinois Commerce Commission rules in favor of ATXI's alternate
294 route 2 from Pawnee to Pana and in the event this ruling does not include the
295 proposed Raynolds/Ramey segment as described above, we find it necessary to
296 enter the following stipulation:

297 We request that the centerline of Illinois Rivers Transmission Line does not
298 pass within 400ft of any property line associated with the Raynolds/Ramey
299 residence at 1236 E 1000 North Road, Taylorville IL 62568.

²⁰ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

²¹ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

²² Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

300 **CONCLUSION**

301 While we maintain our support of Staff's proposed route from Pawnee to Mt. Zion via
302 Kincaid as the best alternative, we also understand that a Pawnee to Mt. Zion via
303 Pana route may be selected if sufficient evidence (based on the Commission's
304 twelve criteria²³) is presented to include it as part of the Illinois Rivers Transmission
305 Project. In the event that a Pawnee to Mt. Zion via Pana route is found necessary by
306 the Commission, we believe that we have sufficiently established the necessity of
307 the Raynolds/Ramey segment as part of ATXI's alternate route 2 between Pawnee
308 and Pana if this route is to meet the Commission's twelve criteria for purposes of
309 evaluating routes.

310 **Q. Does this conclude your rebuttal testimony?**

311 **A. Yes.**

²³ Final Order, Twelve criteria for purposes of evaluating proposed routes. August 20, 2013, p.15

