

**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. 12-598
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.)	

REBUTTAL TESTIMONY OF ERIC SPRAGUE

1 Q: What is your name and address?

2 **A: My name is Eric Sprague and my wife, Julia, and I live at 2378 E. 1900**
3 **North Road, Moweaqua, Illinois 62550.**

4 Q: How long have you lived at that address?

5 **A: We have lived there since 1997.**

6 Q: Please describe your property.

7 **A. We have 32.5 acres of timber land purchased in 2004 with another**
8 **adjoining 2 wooded acres on which our home is located.**

9 Q: Please tell us about your education and occupation.

10 **A. I am Director Asia/Pacific at Environmental Tectonics Corporation**
11 **and am a graduated from Florida Institute of Technology and hold an**
12 **Associate's Degree in Underwater Technology.**

13 Q: What is your interest in AXTI's transmission line project?

14 **A: Our property lies on and along the transmission line route for the**
15 **Pana to Mt. Zion segment which AXTI is proposing on rehearing in this**
16 **proceeding. Our property is shown on the document labeled Sprague**
17 **Exhibit 1.1, which is attached to and incorporated in my testimony.**

18 Q: Who prepared Sprague Exhibit 1.1 and what does it show?

19 **A. I prepared it starting with a Google Earth map which accurately**
20 **depicts the geographical, enviromental, and development characteristics of**
21 **the land as known to me through well over a decade living in the area. I**
22 **outlined our property in what appears as a yellow-green line. The portion**

23 **labeled “A” represents upland forest and the portion labeled “B”**
24 **represents bottomland forest.**

25 Q. What else do you want to point out about the map and your property?

26 **A. Our home is located in the Northwest corner of our property. Toward**
27 **the top of the outlined area is a vertically oriented clear, or light, piece of**
28 **property; this area is a cemetery, which is located just over 300 feet from**
29 **the Eastern edge of our property. The Eastern border of our property also**
30 **abuts N. 2400 E Rd (9th Road), a county road. An existing Shelby**
31 **Cooperative 13kV electric line is located and runs along this portion of 9th**
32 **Road.**

33 Q: Does Sprague Exhibit 1.1 accurately depict what it purports to depict as
34 you have described it?

35 **A: Yes, the map with my hand drawn additions is an accurate depiction**
36 **of the area and our property.**

37 Q: Are you sponsoring any other exhibits?

38 **A: Yes, I am also attaching to and incorporating into my testimony**
39 **Sprague Exhibit 1.2. This exhibit consists of two pages. Page 1 is a portion**
40 **of the AXTI-proposed route for this segment of the line; it was originally**
41 **presented by AXTI as AXTI Exhibit 4.2 (Part 61 of 100), Page 1 of 2. Page 2**
42 **shows two alternative routes for the Pana to Mt. Zion segment of the line.**
43 **AXTI has presented this document (page 2) as part of its witness Donell**
44 **Murphy’s direct testimony on rehearing, AXTI Exhibit 3.0 (RH), Page 14 of**
45 **22.**

46 Q: What is the significance of Sprague Exhibit 1.2?

47 **A: Page 1 of this exhibit shows that AXTI's proposed route for this**
48 **segment of the line tracks and parallels an existing 138kV transmission line**
49 **until it reaches a point East of our property. At that point the route shifts to**
50 **a westerly direction for over 1,000 feet until it reaches 9th Road. At 9th Road,**
51 **the route then shifts to the North and follows 9th Road, passing on and**
52 **along our property, then crossing 1900 North Road, and continuing over**
53 **1,000 feet further North until it shifts back to the East. When the line along**
54 **this easterly portion of the route reaches the 138kV line it resumes tracking**
55 **that line to the North. Page 2 of this exhibit displays the two alternative**
56 **routes for the Pana to Mt. Zion segment in their entirety.**

57 Q: Are you sponsoring any other exhibits?

58 **A. I also am sponsoring Sprague Exhibits 1.3, 1.4 and 1.5. Exhibits 1.3**
59 **and 1.4 each are maps of the area along AXTI's proposed route near our**
60 **property, and Exhibit 1.5 shows a comparison of alternative routes for the**
61 **transmission line along several factors. I will explain these exhibits in more**
62 **detail below.**

63 Q: What is the ICC Staff proposing for this segment of the line?

64 **A: As I understand it, as part of its determination in this proceeding, the**
65 **ICC directed the Staff to prepare a route for the line that would in effect be**
66 **a shortened route from Pawnee to Mt. Zion, bypassing Pana altogether and**
67 **avoiding our property. Staff witness Rockrohr offered testimony on**
68 **rehearing in support of this route. His explanation of the route and the**

69 reasons in support of it appear in his direct testimony on rehearing at lines
70 123 – 314. ICC Staff Exhibit 2.0.

71 Q: What is your position regarding the Staff's proposed route?

72 A: I am not a professional engineer and have not independently studied
73 Staff's proposed route, but my wife and I are in support of Staff's proposal,
74 as it appears it would save money, lessen the number of affected
75 landowners and amount of land traversed, and avoid our property.

76 Q: In the event the ICC determines that the Staff proposed route for this
77 segment of the line is not appropriate, and instead determines that a Pawnee-to-
78 Pana and Pana-to-Mt. Zion route is appropriate, what is your position as to the
79 route AXTI has proposed on rehearing?

80 A: I do not understand why the route for the line includes the "hitch"
81 (as shown in Sprague Exhibit 1.2, Page 1 of 2) in the middle of the South-to-
82 North portion, thereby crossing our property.

83 Q: Why do you oppose this portion of the route segment?

84 A: I oppose it for several reasons. Before stating my reasons for
85 opposing AXTI's proposed route in the area of the "hitch," I will state that it
86 is not clear to me where AXTI proposes to place the line within the "hitch"
87 area, as the routing information ATI provided is lacking in detail.
88 Consequently, the following factors in opposition to AXTI's proposed route
89 are based on assumptions about the location of the line based on my best
90 understanding of where AXTI intends it to be routed. First, the "hitch"
91 increases the length of the line, thereby increasing its cost. Secondly, it

92 causes the line to pass within less than 225 ft along 3 existing, occupied
93 homes and 2 of the 3 homes by less than 175 feet. Third, it would impinge
94 upon and require clear-cutting of a good deal of the timber on our property
95 which is registered with the Illinois Department of Natural Resources. Our
96 registered forester, Robert Clark of Clark Forestry Consulting, conducted a
97 Forest Management Plan in 2006 and identified our timber land consisting
98 of mature and new growth hardwood trees (Bur Oak, Northern Red Oak,
99 Shingle Oak, Pin Oak, Black Walnut, Shagbark Hickory, Wild Black Cheery,
100 American Elm, Osage Orange and Honey Locust). Fourth, the line would
101 have to be routed so as to avoid interfering with the existing Shelby
102 Electric line, and to do so it appears to me AXTI would have to place the
103 line further off of 9th Road (which is not accurately indicated on the AXTI
104 map) and further onto our property in order to achieve required clearances.
105 Fifth, the line would likely be located less than 300 feet from the cemetery I
106 described above. From a review of the record in this proceeding prior to
107 rehearing, residences, cemeteries and trees or wooded areas are all high
108 sensitivities as described by AXTI's routing expert witness Donell Murphy.
109 AXTI Exhibit 4.4 shows the prioritized routing criteria, and Ms. Murphy
110 testified in the original proceeding that as a result of feedback from the
111 public she had moved trees/woodlots from the moderate sensitivities
112 category up to the high sensitivities category. AXTI Exhibit 4.0, lines 152,
113 404, 517.

114 Q: Where should this portion of the Pana to Mt. Zion segment be located?

115 **A: I have 3 alternative routes which I would propose. One is for AXTI to**
116 **continue North along the existing 138kV line, thereby removing the hitch in**
117 **the line (“Sprague Alternative 1”). This would have the benefit of**
118 **shortening the route by what I estimate would be 1/2 mile, and removing**
119 **four right-angle turns, thereby saving what must be a significant amount of**
120 **money from the added labor and equipment required for a longer length**
121 **transmission line with added turns. It would also utilize the existing major**
122 **electric transmission line corridor, which AXTI has identified as an**
123 **opportunity in Ms. Murphy’s routing criteria. ATXI Exhibit 4.4.**

124 **Q: Do you know of any impediments if, under Sprague Alternative 1, AXTI**
125 **were to route the line along the existing 138kV line rather than utilize the “hitch”?**

126 **A: One house (owned by Billy Adams) exists that I know of just North**
127 **and West of where the 138kV line crosses 1900 North Road. I am aware of**
128 **no other impediments.**

129 **Q: What other alternate routes would you propose?**

130 **A: I believe, based on my knowledge of the area, that the line could**
131 **alternatively be routed with a reduced “hitch” as AXTI has proposed.**
132 **Instead of routing it as far to the West, all the way to 9th Road, AXTI could**
133 **terminate the westerly portion about ½ the distance they have proposed. At**
134 **that point the route would turn to the North, continue across 1900 North**
135 **Road (as they have proposed), then turn East just before it encounters a**
136 **forested area located South of and adjacent to the route AXTI has**
137 **proposed. The route would continue running parallel to this segment of the**

138 **AXTI–proposed route, until reaching the 138kV line, and then resuming the**
139 **path to the North alongside the 138kV line (“Sprague Alternative 2”).**
140 **Sprague Exhibit 1.3 illustrates the existing 138kV line, AXTI’s proposed**
141 **route for this portion of the ine, and Sprague Alternative 2.**

142 Q: What attributes or advantages would Sprague Alternative 2 have?

143 A: It would avoid all occupied residences, affect very few trees, and
144 avoid other sensitivities of which I am aware. While it would retain a “hitch”
145 it would represent a shorter overall route, likely by about 1/3 mile, and thus
146 should save money compared to AXTI’s proposed route. It also would
147 avoid the cemetery and the Shelby Cooperative electric line.

148 Q. Do you have another alternative route to propose?

149 A. A variation on the proposal I described in the previous question and
150 answer is shown on Sprague Exhibit 1.4. This alternative (“Sprague
151 Alternative 3”) is the same as Sprague Alternative 2 except that, instead of
152 turning to the West off of the 138kV line routing path at the point at which
153 AXTI’s proposed route (and Sprague Alternative 2) turns, the line would
154 continue further North along the 138kV line until it reaches 1900 North
155 Road. At that point the line’s route would turn to the West and run along
156 the South side of 1900 North Road. It would then turn to the North at the
157 same point at which Sprague Alternative 2 route crosses 1900 North Road.
158 The line would thereafter track the same route as Sprague Alternative 2.

159 Q. What else does Sprague Exhibit 1.4 show?

160 **A. Sprague Exhibit 1.4 also shows residences and other factors**
161 **affected by the route that AXTI proposes and the alternative routes that my**
162 **wife and I are proposing.**

163 Q. What impacts are shown for AXTI's proposed route for this position of the
164 Pawnee to Mt. Zion segment?

165 **A. In addition to what I stated above in explaining our opposition to this**
166 **portion of the route segment, other negative factors exist applicable to this**
167 **route and are illustrated on Sprague Exhibit 1.4. AXTI's proposed route**
168 **would locate the line approximately 220 feet from an existing residence**
169 **owned by Paul Dial. Dial's residence is just South of the point at which**
170 **AXTI's proposed route within the "hitch," heading in a westerly direction,**
171 **turns 90 degrees to the North. Although it is not clear to me, it appears the**
172 **AXTI proposed route would require the line to be located West of the**
173 **existing Shelby Electric line; and given that the Shelby Electric line is**
174 **already located along the West side of 9th Road, the transmission line as**
175 **AXTI has proposed it would move the line further off and to the West of 9th**
176 **Road in order to provide adequate clearance under applicable electric**
177 **safety codes from the Shelby Electric line. Such routing would place the**
178 **line further onto my wife's and my property as well as other properties**
179 **along this portion of the route, one disadvantage of which would result in**
180 **even more timber clearing.**

181 Q. What other impacts would AXTI's proposed route have?

182 **A. As can be seen clearly from Sprague Exhibit 1.4, as the line proceeds**
183 **North it traverses our property and passes along the cemetery I mentioned**
184 **above. Shortly after it crosses 1900 North Road to the North, the line would**
185 **pass approximately within 165 feet of a residence owned by Bailey. It also**
186 **should be noted that AXTI's proposed route would require clearing a**
187 **significant amount of forested land from the Southern end of this portion of**
188 **the line point extending across our property, then across 1900 North Road**
189 **and for another distance North of 1900 North Road, requiring the clearing**
190 **of approximately 1,765 linear feet of forested area in total. Then, at the**
191 **Northern end of this portion of the line, where it turns to the East, it passes**
192 **within approximately 100 feet from the Zindel residence, running on or**
193 **along the Zindel property (located inside, to the Southwest of, the corner of**
194 **the North-to-East turn of the line) on two sides (West and North).**

195 Q. Please describe Sprague Alternative 1 further.

196 **A. This routing alternative would have the transmission line continue**
197 **North along the route of the existing 138kV line thereby eliminating the**
198 **“hitch” entirely. The existing line passes near an existing residence just**
199 **North of 1900 Road owned by Billy Adams, 2421 1990 East North Road, and**
200 **runs approximately 75 feet to the East of another nearby residence owned**
201 **by Harold and Patricia Adams, 2419 East North Road. If the new line**
202 **continued along the route of the existing 138kV line, it presumably would**
203 **similarly impact those residences.**

204 Q. Please describe Sprague Alternative 2 further.

205 **A. This routing alternative is shown on Sprague Exhibit 1.3. It makes**
206 **the turn toward the West just as AXTI's proposed route does but instead of**
207 **proceeding all the way to 9th Road, it turns North just short of ½ the**
208 **distance to 9th Road. Heading North, it crosses a narrow tree line and then**
209 **vacant ground. The route crosses 1900 North Road, and continues North**
210 **on farm ground of Harold and Patricia Adams, East of and adjacent to a line**
211 **of trees that runs North-South, and is to the West of the Adams residence.**
212 **At this point it also is East of a vacated residential structure on**
213 **neighboring property owned by M. Galloway; which home has been**
214 **unoccupied since 1993. The route continues North until just before it**
215 **reaches a forested area, where it turns to the East and runs along the**
216 **northern border of farm ground of the Adams. It continues until it rejoins**
217 **and runs North along the route of the existing 138kV line.**

218 **Q. Please describe the Sprague Alternative 3 route further.**

219 **A. This routing alternative is shown on Sprague Exhibit 1.4. It is**
220 **identical to Sprague Alternative 2 except that the point at which the route**
221 **turns to the West, off of the route of the existing 138kV line, is further**
222 **North, at 1900 North Road. At this point the route runs parallel to and along**
223 **the South side of 1900 North Road. By placing the line on open land along**
224 **the South side of the Road, it is further away from the residences of Billy**
225 **Adams and Harold and Patricia Adams. This route turns to the North at the**
226 **same location as the Sprague Alternative 2 route.**

227 **Q. How were Sprague Exhibits 1.3 and 1.4 prepared?**

228 **A. I prepared these exhibits recently. I started with map printouts of the**
229 **relevant areas using Google Maps. I then added the lines and descriptions**
230 **using functions available. I used a Google distance function to measure**
231 **distances, and in some cases checked distances by measuring them**
232 **personally. My knowledge of the area from living there so long also helped**
233 **me in developing these exhibits.**

234 **Q. Do Sprague Exhibits 1.3 and 1.4 accurately depict what they purport to**
235 **depict?**

236 **A. Yes, they do.**

237 **Q. What is Sprague Exhibit 1.5 and how was it prepared?**

238 **A. I created this exhibit, which is in table form. It shows the impacts of**
239 **the AXTI proposed route and the 3 alternative routes we propose, along**
240 **what I believe are relevant factors, showing the impact if any attributable to**
241 **each respective route alternative for each factor. The values and amounts**
242 **in the exhibit were determined by me using available information and**
243 **based on my knowledge.**

244 **Q. What conclusions do you draw from Sprague Exhibit 1.5?**

245 **A. I believe that based on my testimony above and this table that the**
246 **AXTI routing “hitch” is the most unfavorable routing alternative based on**
247 **the relevant routing factors and considerations. This route impacts 3**
248 **occupied residences, is within 100 feet of an occupied residence, and**
249 **impacts a cemetery. This route also will result in the clearing of 1,765 linear**
250 **feet (at a width commensurate with the easement width AXTI needs). It will**

251 **have to be sited so as to avoid interfering with the Shelby Electric**
252 **distribution line. This route also is the longest of all the alternatives.**
253 **Existing residences, cemeteries and areas of trees are all high sensitive**
254 **category routing factors for this project according to AXTI's routing expert.**

255 Q. Which of the other alternatives do you recommend, if any?

256 A. I believe that Sprague Alternative 1, which has the new line track the
257 existing 138kV line, would be the shortest and most economical. While it
258 would be located very close to one existing residence, that residence is
259 already impacted in a similar manner by the existing 138kV line. If AXTI and
260 the Commission believe that this routing alternative is not acceptable, then
261 I believe that Sprague Alternative 3 is the most favorable. As Sprague
262 Exhibit 1.5 shows, it is located across a road (1900 North Road, an existing
263 infrastructure factor) and approximately 290 feet from the nearest occupied
264 residence, it requires no tree-clearing, and is a shorter length than the
265 route represented by Sprague Alternative 2.

266 Q: Mr. Sprague, why didn't you propose these alternate routes previously,
267 rather than now during this rehearing phase of the proceeding?

268 A: The notification we received from the ICC in October 2013 stated the
269 Pana and Mt. Zion route had been denied by the ICC. As a result of that
270 notification we deemed it not necessary to hire counsel to intervene until
271 we received notice from the ICC in November 2013 that AXTI was again
272 seeking their proposed route of Pana to Mt. Zion.

273 Q. In conclusion, what is your recommendation regarding AXTI's proposed
274 Pana-to-Mt. Zion transmission line segment?

275 **A. My recommendations are, first, that the ICC adopt the ICC Staff's**
276 **recommended route from Pawnee to Mt. Zion, bypassing our property**
277 **completely (assuming the ICC finds a need for this segment at all).**
278 **Secondly, if the ICC Staff's recommendation is not adopted, and instead**
279 **the ICC agrees with AXTI that a Pawnee-to-Pana and Pana-to-Mt. Zion**
280 **segment is needed and appropriate, then I recommend that the "hitch" in**
281 **the line as it is routed North from Pana be eliminated, and that line continue**
282 **to follow the existing 138kV line until it reaches the point at which it turns**
283 **toward Mt. Zion; this is Sprague Alternative 1. Third, if this**
284 **recommendation is not adopted, I recommend that Sprague Alternative 3**
285 **be adopted, which both shortens and narrows the "hitch" in the line.**
286 **Fourth, if this recommendation is not adopted, I recommend that Sprague**
287 **Alternative 2 be adopted, which reflects a "hitch" which has the same**
288 **points of departure from and the rejoining of the 138kV line as AXTI's**
289 **proposed route, but which narrows, and thereby shortens the total length**
290 **of, the hitch in the line.**

291 Q: Does this conclude your testimony?

292 **A: Yes.**