

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

Ameren Transmission Company of Illinois :  
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 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. :

No. 12-0598

Rebuttal Testimony on Rehearing of

**Rudolph "Rudi" K. Reinecke**

On behalf of

**Moultrie County Property Owners**



December 2, 2013

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

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**Rebuttal Testimony on Rehearing of Rudolph “Rudi” K. Reinecke**

**Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

A Rudolph “Rudi” K. Reinecke. My business address is 2150 South Central Expressway; Suite 110, McKinney, Texas 75070. I am currently employed as Vice-President and Project Manager for Integrated Environmental Solutions, LLC (“IES”).

**Q WHAT IS YOUR OCCUPATION?**

A I am an environmental consultant.

**Q ARE YOU THE SAME RUDOLPH “RUDI” K. REINECKE THAT FILED DIRECT TESTIMONY IN THIS PROCEEDING?**

A Yes, I am.

**Q WHAT IS THE PURPOSE OF YOUR REBUTTAL TESTIMONY?**

A The purpose of my testimony is to provide a summary of my analysis of the routing factor data for nine route alternatives between three Mt. Zion substation sites and the Kansas substation. I will also respond to the testimony of Coalition of Property

38 Owners and Interested Parties in Piatt, Douglas and Moultrie Counties, Channon  
39 Family Trust ("PDM") witness Mary Burns

40 **Q PLEASE PROVIDE A SUMMARY OF YOUR REBUTTAL TESTIMONY.**

41 A Through the process of this rehearing, Illinois Commerce Commission Staff ("Staff")  
42 has identified three alternative substation sites for the proposed Mount Zion  
43 substation location and the Channon Family Trust has identified a new alternative  
44 route between Mount Zion and Kansas. I have prepared a comparative analysis for  
45 the evaluation of routing factors for nine permutations of alternative routes which  
46 include three Mt. Zion substation location alternatives (i.e., Mount Zion Sulphur  
47 Spring Road, Staff Option 1 and Staff Option 2) and three route alternatives (i.e.,  
48 ATXI/MCPO Mount Zion to Kansas Stipulated Route or Route Segment MCPO MZK,  
49 Channon Family Trust Route from Mount Zion to Kansas, and the original Ameren  
50 Transmission Company of Illinois ("ATXI") Alternate from Mount Zion to Kansas  
51 Route). I will summarize these nine routes in relation to what was considered High  
52 Sensitivities in the previous proceedings. Next, I will define my methods for routing  
53 along opportunities as defined on page 4 of MCPO Exhibit 2.0 and how utilizing field  
54 lines or apparent property lines as a proxy for actual property lines is common in my  
55 experience with transmission line routing. Next, I discuss the use of Prime Farmland  
56 classification and how it is used for an assessment of impacts to farmland. Finally, I  
57 will summarize how the ATXI/MCPO Mount Zion to Kansas Stipulated Route best  
58 reflects the overall public input, despite the opinions of PDM witness Ms. Burns.

59 **Q WHAT EXHIBITS ARE YOU SPONSORING WITH YOUR REBUTTAL**  
60 **TESTIMONY?**

61 A I am sponsoring the following exhibits:

- 62 • MCPO Exhibit 2.1 (RH) Maps of Alternative Routes between Mount Zion  
63 and Kansas

- 64 • MCPO Exhibit 2.2 (RH) Alternative Route Comparison Data between  
65 Mount Zion and Kansas
- 66 • MCPO Exhibit 2.3 (RH) Summary of Paralleling Opportunities for  
67 Alternative Routes between Mount Zion and Kansas

68 **ALTERNATIVE ROUTE ANALYSIS**

69 **Q WHAT ROUTES DID YOU ANALYZE FOR THIS REBUTTAL TESTIMONY?**

70 A I evaluated the nine permutations of routes utilizing the combination of three Mount  
71 Zion substation locations and three routes between Mount Zion and Kansas. The  
72 three substations locations included the Mount Zion substation on Sulphur Spring  
73 Road and Staff's substation Options 1 and 2. The three routes included the  
74 ATXI/MCPO Stipulated route, Channon Family Trust route, and ATXI Alternate route  
75 between Mount Zion and Kansas.

76 **Q HAVE YOU PREPARED MAPS FOR THE NINE ROUTE PERMUTATIONS YOU  
77 EVALUATED?**

78 A Yes I have. Exhibit 2.1 (RH) consists of maps for each route I analyzed.

79 **Q HAVE YOU PREPARED ALTERNATIVE ROUTE COMPARISON DATA FOR THE  
80 VARIOUS ROUTE PERMUTATIONS YOU EVALUATED?**

81 A Yes I have. Exhibit 2.2 (RH) is similar in format to my MCPO Exhibit 2.3 in the original  
82 proceeding and presented in the same format as the routing matrices identified in  
83 ATXI Exhibit 4.5.

84 **Q WILL YOU PLEASE DESCRIBE HOW YOU PREPARED YOUR ROUTING  
85 ANAYSIS FOR THE NINE ALTERNATIVES IN MCPO EXHIBIT 2.1 (RH), 2.2 (RH),  
86 AND 2.3(RH)?**

87 A I used the same data I acquired for the original proceeding; I used digital spatial data  
88 obtained from ATXI-MCPO DR 3.05, Illinois Department of Natural Resources, and

89 Illinois State Archeological Survey. Additionally I used the updated residential and  
90 non-residential spatial data-set from ATXI-MCPO DR 3.05. All of this data was  
91 available in Geographic Information System (GIS) files so that the analysis involved  
92 programing the software to query length, area, and quantity information based on the  
93 routing factor data presented in the previous proceedings. The analysis took the data  
94 for the three routes between the Mount Zion Sulphur Spring Road substation to  
95 Kansas (i.e., ATXI/MCPO Stipulated route, Channon Family Trust route, and ATXI  
96 Alternate route) and updated them using the new Staff substation Options 1 and 2.

97 **Q WOULD YOU PLEASE SUMMARIZE THE RESULTS OF YOUR ANALYSIS?**

98 A For simplicity, I have provided a table (Table 1) that makes a comparison of the three  
99 routes out of the Sulphur Spring Road substation utilizing the Phase I and Phase II  
100 High Sensitivities that were described in MCPO Exhibit 2.0 pages 4-5 in the original  
101 proceeding. The second table (Table 2) summarizes the three routes utilizing the  
102 Staff Option 1 and 2 Mt. Zion substations; the two option sites were evaluated  
103 together due to their close proximity.

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**TABLE 1**  
**Summary of Phase I and Phase II High Sensitivities for the three Alternative Routes**  
**utilizing the Mount Zion Sulphur Spring Road Substation**

Sensitivity	Alternative Route		
	ATXI/MCPO Stipulated (Route MZK)	Channon Family Trust (Route CFT)	ATXI Alternate (Route ATXIA)
Cemeteries	0	0	0
Churches	0	0	0
Drainage Features <sup>1</sup>	72	59	60
Prime Farmland <sup>2</sup>	1773ac	1894ac	1882ac
Residential Areas <sup>3</sup>	16 66ac	35 171ac	44 179ac
Schools	2	4	2
Woodland	131ac	164ac	137ac

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115<sup>1</sup>Drainage features were identified in this table as streams<sup>2</sup>Prime Farmland used here is the same definition that was utilized by ATXI in the original proceeding.<sup>3</sup>Residential areas were identified by the sum of all residential structures within 500 feet of the route's centerline and the sum of the area of Low, Medium, and High Developed Land Use.

**TABLE 2**  
**Summary of Phase I and II High Sensitivities for the three Alternative Routes utilizing**  
**the Mount Zion Staff Option Substations**

Sensitivity	Alternative Route		
	ATXI/MCPO Stipulated (Routes MZK-1 and MZK-2)	Channon Family Trust (Routes CFT-1 and CFT-2)	ATXI Alternate (Route ATXIA-1 and ATXIA-2)
Cemeteries	0	0	0
Churches	0	0	0
Drainage Features <sup>1</sup>	73	54	60
Prime Farmland <sup>2</sup>	1781-1792ac	1684-1701ac	1797-1808ac
Residential Areas <sup>3</sup>	12 64-66ac	31 154-156ac	42 174-177ac
Schools	1	3	2
Woodland	111ac	143ac	96ac

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119<sup>1</sup>Drainage features were identified in this table as streams<sup>2</sup>Prime Farmland used here is the same definition that was utilized by ATXI in the original proceeding.<sup>3</sup>Residential areas were identified by the sum of all residential structures within 500 feet of the route's centerline and the sum of the area of Low, Medium, and High Developed Land Use.

120 When all three routes utilizing the Sulphur Spring Road substation are compared  
121 utilizing this matrix, the ATXI/MCPO Stipulated route outperforms both the Channon  
122 Family Trust and ATXI Alternate routes in all categories, except drainage features. If  
123 the Staff Option 1 or 2 substations are utilized, the ATXI/MCPO Stipulated route still  
124 performs better than the Channon Family Trust Route and the ATXI Alternate route  
125 on three of the five Phase I and II High Sensitivity factors excluding cemeteries and  
126 churches, as there are no cemeteries or churches along any of these routes. The  
127 Channon Family Trust route has fewer effects on Prime Farmland than either the  
128 ATXI/MCPO Stipulated route or the ATXI Alternate route, the ATXI Alternate route  
129 has less effects on woodlands than the ATXI/MCPO Stipulated route and the  
130 Channon Family Trust route. In summary, the ATXI/MCPO Stipulated route still  
131 performs better in relation to the Phase I and II High Sensitivities, in the aggregate,  
132 than the Channon Family Trust route and the ATXI Alternate route

133 **Q ARE THERE ANY OTHER DIFFERENCES AMONG THE ROUTES YOU**  
134 **ANALIZED?**

135 A Yes. There is a significant difference in the number of non-residential structures  
136 affected by the ATXI/MCPO Stipulated route and the number of structures affected by  
137 the Channon Family Trust route and ATXI Alternate route. Specifically the  
138 ATXI/MCPO Stipulated route has fewer than half the number of structures within 500  
139 feet of the centerline of the Channon Family Trust route and almost three times less  
140 than the ATXI route. What is more important to note is that while MCPO route will not  
141 result in any non-residential structure relocations, the Channon Family Trust and  
142 ATXI Alternate routes could result in the relocation of 6 and 8 structures, respectively,  
143 that are with 75 feet of the centerline of those routes.

144 **Q DID YOU PROVIDE A COMPARITAVE ASSESSMENT OF THE LENGTHS OF**

145 **PARALLELING OPPORTUNITIES FOR EACH OF THE NINE ROUTE**  
146 **ALTERNATIVES?**

147 A Yes this assessment is summarized in MCPO Exhibit 2.3 (RH). In MCPO Exhibit 1.0  
148 (RH), Mr. Dauphinais used this data to evaluate paralleling opportunities for the  
149 subject routes.

150 **PROPERTY BOUNDARIES AND PARALLEL ROUTING**

151 **Q HAVE YOU READ MARY BURN'S TESTIMONY?**

152 A Yes I have.

153 **Q WHAT ARE YOUR OPINIONS REGARDING MS. BURNS' TESTIMONY?**

154 A Ms. Burns testimony is primarily focused on agricultural impacts. Although she  
155 references length, cost, off-course routing, parallel routing, and visual effects, her  
156 discussions appear to focus primarily on impacts to agriculture. I noticed that she  
157 fails to refer to any of the other public input obtained from the public meetings held by  
158 ATXI on the Illinois River's project.

159 **Q PLEASE SUMMARIZE MS. BURNS TESTIMONY WITH REGARDS TO PROPERTY**  
160 **BOUNDARIES.**

161 A Ms. Burns has submitted an analysis with regards to paralleling opportunities, which  
162 introduce calculations for paralleling factors that have not been previously identified  
163 or used in this proceeding. These include the use of ½ section lines and property  
164 lines. She further quantifies the number of properties that are bisected by the  
165 ATXI/MCPO Stipulated route and the Channon Family Trust route. Additionally she  
166 criticizes me for not calculating the length of property lines and ownership of farm  
167 tracts. As a result, she testifies that I could not have properly routed the MCPO route  
168 following the public interest factors without having knowledge of the property  
169 boundaries. She further criticizes the MCPO route for "zigzag design" that disregards

170 the property lines and “splitting of farm tracts.”

171 **Q WHY DID YOU NOT ROUTE THE MCPO LINE ALONG OR QUANTIFY THE USE**  
172 **OF ½ SECTION LINES?**

173 A I did not specifically utilize ½ section lines for a routing opportunity because this was  
174 not a defined opportunity in this proceeding. Furthermore, not every section is  
175 divided into ½ sections and as a result they are even less likely than a section line to  
176 represent an indicator of linear disturbance that is desirable for transmission line  
177 paralleling. However, the ATXI/MCPO Stipulated route does implicitly utilize ½  
178 section lines for a portion of the project as it coincided with field lines

179 **Q WHY DIDN'T YOU USE THE PLAT BOOKS IN THE PROCESS OF ROUTING THE**  
180 **MCPO ROUTE?**

181 A It is common practice in my experience in the routing process to not utilize information  
182 that identifies the property ownership, as it has the potential to bias the routing  
183 consultant. The plat books only provide approximate property boundaries; the scale  
184 of the graphics makes it difficult to determine the exact property limits. The plat  
185 books are often out of date as soon as they are published, because the ownership or  
186 parcel boundaries could have changed due to the selling or subdividing properties.  
187 Finally, I want to follow and did follow common practice, based on my experience, in  
188 this industry.

189 **Q DID ATXI HAVE THE PROPERTY BOUNDARY INFORMATION WHEN THEY**  
190 **INITIALLY ROUTED THEIR LINES BETWEEN MT. ZION AND KANSAS?**

191 A To the best of my knowledge they did not. Data I received from ATXI-MCPO DR 3.05  
192 did not include property line information. Ms. Murphy's testimony in the original  
193 proceeding does not indicate that she utilized property ownership maps to route  
194 ATXI's Primary and Alternate routes.

195 **Q HOW DO ROUTING CONSULTANTS INCORPORATE CONCERNS ABOUT**

196 **PROPERTY LINES INTO THEIR ANALYSIS?**

197 A In my experience, it is an accepted practice to assume property lines along roads and  
198 fence lines or field lines. Generally, routing consultants refer to these as apparent  
199 property lines. For the reasons stated above, routing consultants should not be  
200 provided with maps revealing the identity of individual owners to determine the exact  
201 property line because of the potential for bias. In this case, field lines were used as a  
202 proxy for property boundaries within the boundaries of individual sections. The field  
203 boundaries were identified primarily from recent aerial photography through  
204 photograph interpretation of different color signatures of crops, crop age, or changes  
205 in direction of cultivation.

206 **Q DID YOU UTILIZE PROPERTY LINES IN THE DEVELOPMENT OF THE MCPO**  
207 **ROUTE?**

208 A I used field lines as a proxy for property lines. The MCPO route follows existing field  
209 lines where possible, but not at the cost of ignoring other high sensitivities, such as  
210 residential and non-residential structures, woodlands, and schools.

211 **Q DID YOU CALCULATE THE PORTIONS OF THE LENGTH OF THE NINE**  
212 **ALTERNATIVE ROUTES THAT PARALLELED PROPERTY LINES?**

213 A No. In order to do so properly, a survey would be necessary.

214 **Q HOW DID MS. BURNS CALCULATE PARALLELING PROPERTY LINES AND THE**  
215 **NUMBER OF TRACTS BISECTED?**

216 A According to her methods identified in her Rehearing Testimony she appeared to  
217 utilize only field borders as identified by Farm Services Agency that was dated from  
218 2008 and an undated aerial photograph. With the use of these tools, Ms. Burns'  
219 estimates on paralleling property lines and tracts bisected are at best a rough  
220 estimate.

221 **Q MS. BURNS COMPLAINS THE MCPO ROUTE "ZIGZAG" IN DISREGARD OF**

222 **PROPERTY LINES. PLEASE EXPLAIN YOUR ROUTING APPROACH?**

223 A The MCPO route was laid-out to best reflect all of the public input factors, not just  
224 agriculture use areas. As stated before, there are other High Sensitivities that the  
225 public were concerned about and the MCPO route was designed to balance all of the  
226 factors. The MCPO route's alignment was adjusted to avoid churches, cemeteries,  
227 schools, residential and non-residential structures, an airport, developed areas, and  
228 to be aligned with opportunities. As a result, the MCPO route provides better factors  
229 on nearly all of the Phase I and II High Sensitivities.

230 **Q DOES THE MCPO ROUTE "SPLIT" FARM TRACTS?**

231 A Since a survey of the property boundaries has not been conducted for the tracts  
232 along the MCPO route, I do not know how the ATXI/MCPO Stipulated route lies in  
233 relation to farm tract boundaries. Due to the nature of the region, any alternative  
234 between Mount Zion and Kansas will traverse through farm tracts. From my  
235 understanding, ATXI will not be acquiring ownership of the 150-foot corridor; ATXI will  
236 only be acquiring an easement. Therefore, the property owners of each of these farm  
237 tracts will retain the ownership of the tract and ability to continue to farm within this  
238 easement. The ownership of the properties will not be split by the transmission line.

239 **AGRICULTURE IMPACTS**

240 **Q ARE YOU FAMILIAR WITH THE ROUTING FACTOR "PRIME FARMLANDS"?**

241 A Yes, this is one of the factors for evaluating the impacts to agriculture use areas. This  
242 is a data set that ATXI obtained from U.S. Department of Agriculture (USDA) Natural  
243 Resource Conservation Service (NRCS), which classifies the soil series as to whether  
244 they have the potential to meet the definition of Prime Farmland.

245 **Q WHAT IS THE STANDARD USED FOR CLASSIFYING FARMLAND FOR THE**  
246 **PURPOSE OF ANALYZING TRANSMISSION LINE ROUTING?**

247 A In my experience, the USDA NRCS Prime Farmland classification is the only  
248 standard that has been used.

249 **Q WILL YOU PLEASE DESCRIBE HOW YOU HAVE USED PRIME FARMLAND**  
250 **CLASSIFICATION IN THE PAST?**

251 A I have analyzed more than fifty routing projects for roads, transmission lines, and pipe  
252 lines utilizing this same standard. In every one of these projects, we obtained the soil  
253 classifications from USDA NRCS to assess any potential effects on Prime Farmland.

254 **Q IS THIS THE SAME STANDARD THAT HAS BEEN USED TO DATE IN THIS**  
255 **PROCEEDING?**

256 A Yes. In this project, we obtained the data set from ATXI, and ATXI obtained it from  
257 USDA NRCS. The estimate of impacts to Prime Farmland was calculated by the  
258 amount of these classified prime farmland soils that are within the 500-foot analysis  
259 corridor.

260 **Q DID MS. BURNS INTRODUCE A DIFFERENT WAY OF CALCULATING PRIME**  
261 **FARMLAND IMPACTS?**

262 A Yes, she is utilizing a productivity index that is based on the University of Illinois  
263 standards and practices of the Illinois Society of Professional Farm Managers and  
264 Rural Appraiser. Basically, Ms. Burns states that the University of Illinois at Urbana-  
265 Champaign utilize these productivity indices to determine prime farmland, which  
266 basically indicates that nearly all farmland in this region is classified as prime for this  
267 definition. Therefore, this methodology does not aid in differentiating a route based  
268 on farmland impacts.

269 **Q WHAT DO YOU MEAN THAT THIS CLASSIFICATION OF SOILS BASED ON**  
270 **PRODUCTIVITY INDEXES RESULTS IN NEARLY ALL OF THE FARMLAND IN**  
271 **THE REGION BEING CLASSIFIED AS PRIME?**

272 A According to Ms. Burns' calculations, 98 percent of both the ATXI/MCPO Stipulated

273 route and the Channon Family Trust route traverse soil types with PI's greater than  
274 100, and are considered prime farmland according to the Illinois Society of  
275 Professional Farm Managers and Rural Appraiser. Therefore, in this case, all one  
276 has to do is look at the length of the route to estimate the approximate amount of  
277 prime farmland will be impacted.

278 **Q DO YOU AGREE WITH THIS METHOD AND MS. BURNS CALCULATIONS FOR**  
279 **ESTIMATING PRIME FARMLAND IMPACTS?**

280 A No. First of all, the majority of the route for the Illinois Rivers Project has already  
281 been decided utilizing an estimation of impacts to Prime Farmland using the USDA  
282 and NCRS standards, not the productivity indexes Ms. Burns uses. Secondly, it  
283 appears that the USDA and NRCS standards are more sensitive with regard to  
284 accounting for the differences in the soils than Ms. Burns' method, which concludes  
285 that two geographically separate routes of different lengths have exactly the same  
286 percentage of prime farmlands.

287 As for Ms. Burns' calculations, they appear to be biased in their illustration of alleged  
288 differences between the ATXI/MCPO Stipulated route and the Channon Family Trust  
289 route. Her prime farmland comparisons of the ATXI/MCPO Stipulated route and  
290 Channon Family Trust route utilized two extremes – ATXI/MCPO Stipulated route  
291 starting at the Sulphur Spring Road Substation versus the Channon Family Trust  
292 route utilizing the Staff substation Option 1. If you utilized the same starting point of  
293 Sulphur Spring Road substation, the difference in prime farmland as defined by Ms.  
294 Burns affected by the two routes is a negligible 58 acres. I used Ms. Burns' formula  
295 for calculating acres of prime farmland affected by the two routes.<sup>1</sup> Under Ms. Burns  
296 formula there are 1179 acres of prime farmland along the 66.2 mile Channon Family

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<sup>1</sup> This is calculated utilizing Ms. Burns' formula: route length in miles x 18.18 acres per mile in the 150-foot transmission line easement x percent of prime farmland = Acres of prime farmland effected

297 Trust route initiating at the Mount Zion Sulphur Spring Road substation compared to  
298 1238 acres of prime farmland along the 69.2-mile ATXI/MCPO Stipulated route  
299 initiating at the Sulphur Spring Road substation (1238 – 1179 = 58).

300 **Q DOES MS. BURNS INTRODUCE AN ADDITIONAL FACTOR FOR MEASURING**  
301 **IMPACTS TO FARMLAND?**

302 A Yes, she references the placement of towers within farmland will negatively impact  
303 the ease of farming. She states that poles placed in a farm tract, will negatively  
304 impact the farming operation that translates into economic effects to the landowner.

305 **Q DO YOU AGREE THAT TRANSMISSION TOWERS LOCATED WITHIN A FARM**  
306 **TRACT WILL IMPACT THE EASE OF FARMING AND RESULT IN DECREASED IN**  
307 **ECONOMIC BENEFITS TO THE LAND OWNER?**

308 A Yes, however, this needs to be kept in perspective. The vast majority of the  
309 transmission towers for the entire Illinois Rivers Project will be placed in farm tracts,  
310 whether near the property boundaries or in the middle of the field. So therefore, all of  
311 the farm tracts will be negatively impacted along every route.

312 Additionally, the economic effects for a single farm tract or all of them collectively  
313 along a route will not substantially affect the overall viability of the enterprise. This is  
314 easily observed through looking at land in the area that has one or more existing  
315 transmission lines through the middle of farm tracts and cultivation practices are still  
316 occurring. There are several examples of ongoing farming operations with two  
317 existing transmission lines both along field lines and through the middle of a field  
318 shown on pages 17 through 20 in MCPO Exhibit 2.2. Another great example of how  
319 farming continues to be economically viable with transmission lines routed through a  
320 farm tract is identified on page 1 of MCPO Exhibit 2.1 between the existing and  
321 proposed Pana substations. There are two 345kV and two 138kV lines in this farm

322 tract, with the poles scattered (not aligned with each other). If farming on these tracts  
323 can be maintained with this number of obstructions, then it can be maintained on the  
324 tracts along the route between Mount Zion and Kansas also.

325 **Q DO YOU AGREE WITH MS. BURNS' ASSESSMENT THAT THE MCPO ROUTE**  
326 **DOES NOT COMPLY WITH THE TERMS OF THE AGRICULTURAL IMPACT**  
327 **MITIGATION AGREEMENT (ATXI Exhibit 5.3)?**

328 A No. She refers to this agreement as a requirement to minimize the placement of  
329 transmission poles upon agricultural land during this route selection process. The  
330 agreement appears to be specific to construction activities. The agreement minimizes  
331 the placement of transmission poles on agriculture land during the design and  
332 construction phase.

### 333 CONCLUSIONS

334 **Q WHAT ARE YOUR CONCLUSIONS REGARDING THE NINE ROUTE**  
335 **ALTERNATIVES BETWEEN MOUNT ZION AND KANSAS?**

336 A Regardless of which Mount Zion substation site is selected, the ATXI/MCPO  
337 Stipulated route represents the best balance of all of the routing factors described in  
338 the public input process. If the Sulphur Spring Road substation is selected, the  
339 ATXI/MCPO Stipulated route has better routing factors for four of the five High  
340 Sensitivity factors than either Channon Family Trust or ATXI Alternate routes  
341 (excluding cemeteries and churches because there are none on either route). If one  
342 of the Staff Option 1 or 2 substation locations is selected, the ATXI/MCPO Stipulated  
343 route has better routing factors for three of the five High Sensitivity factors than either  
344 Channon Family Trust or ATXI Alternate routes.

345 **Q WHAT ARE YOUR CONCLUSIONS REGARDING MS. BURNS CRITICISMS OF**  
346 **THE ATXI/MCPO STIPULATED ROUTE?**

347 A Ms. Burns general criticism of the ATXI/MCPO Stipulated route is that it adversely  
348 affects farmland more than the Channon Family Trust route. She is simplifying the  
349 farmland impact by using a different definition of prime farmland than used for the  
350 evaluation of the rest of the Illinois Rivers Project and when you compare the routes  
351 properly (i.e., using the same starting point of the Sulphur Spring Road substation),  
352 the difference in her prime farmlands is not significant. She further does not want to  
353 acknowledge that the Channon Family Trust route may require the relocation of 6  
354 non-residential structures, which appear to be all associated with farm operations.  
355 However the ATXI/MCPO Stipulated route does not require the relocation of any  
356 structures.

357 Ms. Burns indicates that the placement of poles on farm tracts will affect the ease of  
358 operations and ultimately the economics; however, there are several instances in  
359 which farming still occurs, with not just one, but four transmission lines riddling a field  
360 with poles. The amount of land that will be permanently removed from cultivation is  
361 simply the area of the tower foundation, and this area has been minimized through  
362 the use of a monopole design. Ultimately, after a route is selected, the number of  
363 poles will be minimized during the design and construction phase of the project to  
364 comply with the Agriculture Impact Mitigation Agreement.

365 She is basing her testimony of comparison between the two routes primarily on the  
366 fact that 47 percent of public input favored routing a line away from agriculture use  
367 areas. What she is failing to realize is that a route is selected based on all of the  
368 routing factors, not just one consideration. Public input also had significant concerns  
369 with a route near residential areas along with concerns for woodlands, cemeteries,  
370 churches, drainage features, prime farmland, and schools. Ms. Burns emphasis on  
371 the evaluation of primarily prime farmland impacts, one factor out of many, has

372 demonstrated significant flaws in the development in her opinion that the Channon  
373 Family Trust route is better than the ATXI/MCPO Stipulated Route.

374 **Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

375 **A** Yes, it does.

376