

PDM Ex. 8.8 – DR ATXI-PDM 3.01-3.18

RESPONSE TO

DATA REQUESTS

The below data requests are directed to PDM witness, Ms. Mary Burns:

ATXI-PDM 3.01 Provide Ms. Burns's resume or curriculum vitae.

Response: Please reference PDM Ex. 6.0 lines 6-10 and line 33.

ATXI-PDM 3.02 Please define the phrase "off-course routing" as that phrase is used throughout Ms. Burns's direct testimony. Is the term is a formal engineering term? If yes, please provide a citation to a text or treatise defining it.

Response: Please reference PDM Ex. 6.0 line 106 for definition specific to routing from Mt Zion to Kansas as that phrase is used by Ms. Burns. Ms. Burns is not an engineer.

ATXI-PDM 3.03 Please provide all calculations or analyses Ms. Burns conducted in support of her statement, at page 6, line 108 of her direct testimony, that the "MCPO route heads far to the north and is off-course 7.5 miles."

Response: Please reference MCPO Ex. 4.2 pages 1-4 and PDM Ex. 6.3.

ATXI-PDM 3.04 At page 6, lines 108-109 of her direct testimony, Ms. Burns states that the "Channon Hybrid Route heads in a southeasterly direction and uses limited off-course routing to stay aligned with section and half-section lines while avoiding obstructions." Please provide a map depicting each instance in which the Channon Hybrid Route uses "off-course routing."

Response: Please reference ATXI Ex. 4.2 Part 68 of 100, page 2 of 2; ATXI Ex. 4.2 Part 79 of 100, page 1 of 2; ATXI Ex. 4.2 Part 79 of 100, page 2 of 2.

ATXI-PDM 3.05 Please provide a map depicting each instance in which the MCPO route uses off-course routing.

Response: Please reference MCPO Ex. 4.2 pages 1-4

ATXI-PDM 3.06 At page 6, line 113 of her direct testimony, Ms. Burns states that the MCPO route travels additional miles “[f]or the purpose of avoiding Moultrie County.” Please explain the basis for this statement, including all Documents that support Ms. Burns’s statement.

Response: Please reference rebuttal testimony of Mr. Dennis Kramer, ATXI Ex. 11.0 page 4, lines 87-88 and lines 92-94:

“Mr. Dauphinais’ focus is exclusively upon attempting to prove that a new 345 kV transmission line does not need be constructed across Moultrie County.”

“He [Dauphinais] also briefly discusses the option of routing the Mt. Zion to Kansas 345 kV transmission line around Moultrie County or even using a single new 345 kV transmission line from Pana substation to serve the new Mt. Zion substation.”

Please reference rebuttal testimony of Mr. Dennis Kramer, ATXI Ex. 11.0 page 12, lines 265-268:

“It is my opinion his [Dauphinais] conclusion that there are alternatives is primarily driven by a need to find a planning rationale to eliminate any new transmission line from traversing Moultrie County and potentially impacting the members of the MCPO.”

ATXI-PDM 3.07 At page 8, lines 151-155 of her direct testimony, Ms. Burns states that the “most important societal and environmental impacts to be mitigated by parallel routing” is “minimize[d] crossing of farmland previously untouched by structures.” Please explain how Ms. Burns determined that minimal crossing of farmland was the “most important” factor to be

mitigated by parallel routing, and provide all Documents that support or otherwise relate to Your response.

Response: Ms. Burns' testimony does not make such a statement. Testimony states "Assuming parallel routing would in fact mitigate these impacts, public input suggests..." For recent examples of public input please reference the MSSCLPG Direct Testimony on Rehearing Ex. 5.0 through 12.0.

ATXI-PDM 3.08 At page 9, line 162 of her direct testimony, Ms. Burns states that "perceived benefits achieved by paralleling are canceled by the off-course miles" of the MCPO route. Please provide any study or other analysis You conducted in determining that benefits of parallel lines are "canceled."

Response: Please reference response to ATXI-PDM 3.03 and PDM Ex. 6.1

ATXI-PDM 3.09 At page 9, lines 168-169 of her direct testimony, Ms. Burns states that "perceived visual benefits achieved by paralleling are cancelled by the of-course miles" of the MCPO route. What about the benefits are "perceived"? Please provide any study or other analysis You conducted in determining that visual benefits are "canceled."

Response: Please reference response to ATXI-PDM 3.08

ATXI-PDM 3.10 At page 10, line 199 of her direct testimony, Ms. Burns states that "farmland today is bought and sold on the basis of its PI." Please explain the basis for this statement, including all experience Ms. Burns has in transactions concerning farmland or other real estate, and provide all Documents that support or otherwise relate to Your response.

Response: Please reference the 2013 Illinois Farmland Values and Lease Trends published by the Illinois Society of Professional Farm Managers and Rural Appraisers. Ms. Burns owns prime Illinois farmland, attends farmland auctions and has purchased farmland at auction.

ATXI-PDM 3.11 Please provide a copy of the 2013 Illinois Farmland Values and Lease Trends, published by the Illinois Society of Professional Farm Managers and Rural Appraisers, described on page 11, lines 212-214 of Ms. Burns's direct testimony.

Response: This publication is available at www.ispfmra.org.

ATXI-PDM 3.12 Provide all maps created or developed by Ms. Burns in conducting her analysis of the route alternatives, including those depicting the "rectangular drawing[s], 150-foot wide and generally the length of a township," the "field borders," and the "soil data," each described at page 11, lines 220 through 229 of Ms. Burns's direct testimony.

Response: These maps were provided in response to MCPO-PDM 1-1 to 1-3 data request.

ATXI-PDM 3.13 At page 12, lines 234 and 235 of her direct testimony, Ms. Burns states that 98% of the acres within the easement area of the Channon Hybrid Route and the MCPO route "are prime." Please define the term "prime" as used therein.

Response: Please reference PDM Ex. 6.0 lines 208 to 212.

ATXI-PDM 3.14 Provide Ms. Burn's understanding of the amount of prime farmland that would be taken out of production for (1) the Channon Hybrid Route and (2) the MCPO route. Be sure to provide the calculation used to derive the amount.

Response: Objection - Ms. Burns did not testify regarding the amount of prime farmland that would be taken out of production.

ATXI-PDM 3.15 At page 12, lines 249-250 of her direct testimony, Ms. Burns states that 98% of the route's easement areas are prime farmland, "whether you use a 500-foot corridor, a 150-foot easement area, or just the tower footprint." Please provide all analyses and calculations relied upon by Ms. Burns in making this statement, and Documents that support or otherwise relate to this statement.

Response: See response to ATXI-PDM 3.12

ATXI-PDM 3.16 At page 14, lines 278-280 of her direct testimony, Ms. Burns states: "In addition to the 80 bisected properties previously reported, all properties along the approximate 5.5 mile long diagonal of parallel routing are bisected." Please state the number of properties "along the approximate 5.5 mile long diagonal of parallel routing" that are bisected, and provide all Documents that You relied upon in developing Your response.

Response: At least 23 properties are bisected, using the MCPO Google Earth route provided in discovery by MCPO and township plat maps, which are readily available.

ATXI-PDM 3.17 Please define and quantify the term "severe turns" as that term is used at page 16, line 336 of Ms. Burns's direct testimony.

Response: Deadend Structures 15-degrees to 90-degrees defined in ICC Staff Ex. 1.0 Attachment H

ATXI-PDM 3.18 At page 18, line 369 of her direct testimony, Ms. Burns states that the MCPO route splits "16 of the 18 properties in its path." Please define the term "properties," as used therein, and state the number of landowners who own these properties.

Response: Property as defined in this context is a tract of farmland such that the section and ownership of the tract is unique from the section and ownership of contiguous tracts. The eighteen properties are represented by seventeen unique ownerships.