PDM Ex. 8.11 – DR Channon-MCPO 1.04

Ameren Transmission Company of Illinois
ICC Docket 12-0598 (On Rehearing)

Moultrie County Property Owner's Responses to
The Channon Trust's First Data Request

CHANNON-MCPO 1.04: For the ATXI-MCPO stipulated route from ATXI's proposed Mt. Zion substation site on Sulphur Springs Road to the Kansas substation site, please provide the following:

(a) Please provide the length in miles for this route;

(b) Please provide the number of property owners within 250 feet of the route centerline;

(c) Please provide the number of property owners within the 150-foot easement area;

(d) Please provide the number of cultivated farmland tracts which are bisected;

(e) For each residential structure within 500 feet of the route centerline, please state the location of that structure by township and section, and state whether that structure is located within 0-75 feet, 70-150 feet, 150-300 feet, or 300-500 feet of the route centerline;

(f) For each non-residential structure within 500 feet of the route centerline, please state the location of that structure by township and section, and state whether that structure is located within 0-75 feet, 70-150 feet, 150-300 feet, or 300-500 feet of the route centerline;

(g) Please provide the same items of data for this route as were presented in ATXI Ex. 4.5, pages 1-4, in the same format as ATXI Ex. 4.5;

(h) Please state the number of structures (poles) by type on this route (using the definitions presented in ICC Staff Ex. 1.0 Attachment H);

(i) For running angle and dead-end structure types on this route, please identify the approximate location of each by township and section;

(j)

(1) Please state the distance in miles that this route is located upon or immediately adjacent to a roadway corridor.

(2) Please provide state the distance in miles that the remaining portion of this route (that is, excluding those parts of the route included in (1)) is located upon or immediately adjacent to section lines.

(3) Please state the distance in miles that the remaining portion of this route (that is, excluding those parts of the route included in (1) and (2)) is located upon or immediately adjacent to half (1/2) section lines.

(4) Please state the distance in miles that the remaining portion of this route (that is, excluding those parts of the route included in (1) through (3)) is located upon or immediately adjacent to property lines.

(k) Please provide the "base cost" estimate for this route, including the detail for actual material cost, labor cost, engineering cost, real estate cost and environmental cost, as those terms were used by ATXI witness Murbarger (hearing transcript of May 14, 2013, page 355, line 21 to page 356, line 2). Provide all detail analysis to show how such estimates were made.

RESPONSE:

MCPO generally objects to question 1.04 as vague and ambiguous and unduly burdensome because many of its subparts ask for analyses that MCPO has not performed and/or utilize undefined terms susceptible to different interpretations. For example, subpart (d) asks for the number of "cultivated farmland tracts" without providing Channon's definitions of "cultivated farmland tracts". It also refers to "bisected" tracts, but fails to define that term. Nothwithstanding the objection , and without waiving it, MCPO states as follows:

(a) Please refer to MCPO Exhibit 2.3, page 1.
(b) MCPO does not have the requested information. MCPO has not performed the analysis required to make the determination. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. The requested information has not been created as a routing factor for this proceeding.
(c) MCPO does not have the requested information. MCPO has not performed the analysis required to make the determination. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. The requested information has not been created as a routing factor for this proceeding.
(d) MCPO does not have the requested information. MCPO has not performed the analysis required to make the determination. MCPO essentially used the same routing data and factors used by ATXI. MCPO has not performed the analysis required to make that determination used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. The requested information has not been created as a routing factor for this proceeding.
(e) MCPO does not have the requested information. MCPO has not performed the analysis necessary to make this determination. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. MCPO assessed residential structures and assigned them spatial locations as presented in MCPO-ATXI Data Response 7.01. MCPO Exhibit 2.3 presents the tally of residential structures based on 0-75 feet, 70-150 feet, 150-300 feet, or 300-500 feet of the route centerline.

(f) MCPO does not have the requested information. MCPO has not performed the analysis necessary to make this determination. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. MCPO assessed non-residential structures and assigned them spatial locations as presented in MCPO-ATXI Data Response 7.01. MCPO Exhibit 2.3 presents the tally of non-residential structures based on 0-75 feet, 70-150 feet, 150-300 feet, or 300-500 feet of the route centerline.

(g) Please refer to MCPO Exhibit 2.3.

(h) Please see the Docket No. 12-0598 Hearing Transcript at pages 572 through 574.

(i) MCPO has not developed a tabulation of the approximate location by township and section for running angle and dead-angle structure types on their route. This information may be estimated from the maps provided of this route in Docket No. 12-0598 MCPO Corrected Exhibit 2.2. However, please note that as ATXI witness Jerry A. Murbarger testified in his rebuttal testimony in Docket No. 12-0598, the exact locations of individual transmission structures will not be determined by ATXI until the detailed design phase which does not occur until after a route is approved by the Commission (ATXI Exhibit 16.0 (Rev.) at page 4).

(j) (1) Please refer to MCPO Exhibit 2.6.

(2) Please refer to MCPO Exhibit 2.6.

(3) MCPO does not have the requested information. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. The requested information has not been created as a routing factor for this proceeding.

(4) MCPO does not have the requested information. MCPO essentially used the same routing data and factors used by ATXI and presented and used that data in the manner in which it was presented and used by ATXI in ATXI Exhibit 4.5. The requested information has not been created as a routing factor for this proceeding.

(k) MCPO relies on the estimate provided by ATXI witness Murbarger, ATXI Ex. 16.3 (Rev.), page 7 of $126,511,000. MCPO does not have the detailed cost analysis underlying that ATXI estimate.