

**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 to Section 8-) Docket No. 12-0598
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, Macon, Clark, Coles, Edgar, Fulton,)
Macon, Montgomery, Morgan, Moultrie, Pike,)
Sangamon, Schuyler, Scott and Shelby, Illinois.)

REBUTTAL TESTIMONY OF INTERVENOR PAULA D. COOLEY ON REHEARING

NOW comes Intervenor Paula D. Cooley, through her attorneys, and files her rebuttal testimony in this proceeding on rehearing.

Q: Please state your name?

A.: Paula Cooley

Q: Please explain the issues with the Federal Aviation Commission (FAA) that you believe make the Staff's latest recommendation for a substation north of W. Hilvety Rd (CR 2100N) and east of Rosedale Rd. the preferable alternative for a Mt. Zion area substation?

A: In discovery, we learned that "ATXI did not order nor is ATXI aware of any air case study from the FAA for the purpose of the Illinois Rivers Project in Macon County. Pending final route approval by the Commission, ATXI will obtain all required permits or approvals associated with this route in advance of construction." [See Exhibit 1, answer to Macon 3.01]. I made a public comment on August 20, 2013, meant to bring notice to FAA issues in Section 22 of Macon County. [See Exhibit 2, containing a my public comment and the lease at issue for the site described, which I incorporate herein by reference]. I have, twice, personally met with FAA



engineers on sight in Section 22 of Macon County and have driven the proposed primary and alternate routes with them. This was prior to Staff's introduction of the Kinkaid route and, until staff proposed substation options 1 and 2 on that route, appeared not to be terribly relevant. However, should either of these substation options occur (1 and 2), then the FAA issue would once again be in play. I have also spoken with 2 FAA flight study department specialists and the technical information in my public comment is from one of the specialists.

It appears, however, that the Hilvety substation and the lines coming and going from it would not be in close proximity to the active FAA Very High Frequency Omni-directional Range/Tactical Air Navigation facility on property owned by Juanita Rutherford (and more specifically described in my public comment), and would therefore not implicate the concerns with the FAA I previously expressed.

Q: Is your testimony that the Staff's latest Hilvety location for a substation is the least problematic meant to be a concession that a Mt. Zion area needs another substation?

A: No. To supplement my previous testimony as to Decatur's declining industrial outlook, please see Exhibits 3, 4 & 5. ADM is moving its global HQ out of Decatur. Caterpillar not only cut 460 jobs earlier this year but in September it sent out letters to white-collar workers as well. The attachment reads "...800 recent production-related job cuts that have already hit the Decatur plant." Additionally, according to Ameren, "AIC is expanding its Faries Park substation and in the process of constructing the new facilities. ADM is not building nor an owner of the AIC substation." [See Exhibit 1, answer to Macon 3.03]. Note the former EDC's president's comment in there-"This will go a long way toward stabilizing the electrical system out on that end of town". I submit that building any other substation near Decatur might fly in the face of "least cost" analogy. I reiterate the question of AIC's responsibility for and likelihood to hook up

to yet another new substation in the Decatur area. Note in Exhibit 6 "The capital investment will be somewhere between \$39 million and \$47 million" for the new Faries Park substation. How many of these do they need or can they afford? Mr. Rockrohr also voices this concern in lines 20-25 of his testimony on November 13, 2013.

Q: Do you have any other comments you wish the Commission and the ALJ's to consider when making their decision?

A: Yes. Basically, should the commission still see a need for a new substation, Greg Rockrohr's recommendation of the Hilvety site stands on the merits of his testimony. His three-pronged analysis of Pana, Moweaqua and Mt. Zion 138Kv connections make a lot of sense to me. No, I am not a transmission line planning specialist, but since people who are don't necessarily agree, maybe understanding it from a macro approach is preferable. Least cost is self-explanatory. Finally, a project of this magnitude will affect many future generations. I trust the Commission appreciates this and will exercise all due diligence in this process.

DATED this 2nd day of December, 2013

By: /s Christopher M. Ellis
Christopher M. Ellis
Jon D. Robinson
Timothy J. Tighe, Jr.
Bolen, Robinson & Ellis, LLP
202 South Franklin Street, 2nd Floor
Decatur, Illinois 62523
Phone: (217) 429-4296
Fax: (217) 329-0034
Email: cellis@brelaw.com
jrobinson@brelaw.com
ttighe@brelaw.com

PROOF OF SERVICE

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Paula D. Cooley, herewith certify that I did on the 2nd day of December, 2013, electronically file with the Illinois Commerce Commission, Rebuttal Testimony of Intervenor Paula D. Cooley on Rehearing and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis
Christopher M. Ellis
Bolen, Robinson & Ellis, LLP
202 South Franklin Street, 2nd Floor
Decatur, Illinois 62523
Phone: (217) 429-4296
Fax: (217) 329-0034
Email: cellis@brelaw.com