STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois	)	
	)	
Petition for 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	)	No. 12-0598
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.	)	

BRIEF ON REHEARING OF LOUISE BROCK-JONES LIMITED PARTNERSHIP IN SUPPORT OF THE ATXI-MCPO PROPOSED ROUTE FROM MOUNT ZION TO KANSAS

COMES NOW, the Louise Brock-Jones Limited Partnership in Support of the ATXI-MCPO Stipulated Route from Mount Zion to Kansas on rehearing, and in support thereof, states as follows:

I. Introduction

The Louise Brock Limited Partnership (the "Partnership") filed its initial brief supporting ATXI's proposed route from Mount Zion to Kansas. The Partnership did not hear any evidence offered at rehearing to change its position. Indeed, after considering the proposed routes from the Coalition of Property Owners and Interested Parties in Piatt, Douglas, and Moultrie Counties ("PDM"), the Channon Family Trust, and the Village of Mount Zion, the evidence has bolstered the Partnership's position, not diminished it. The Partnership owns approximately 240 acres of prime farmland in Coles County (the "Property"). The Property is on ATXI's originally proposed

Primary Route. Because the proposed transmission line will have an adverse impact on the Partnership's farming operations, the Partnership respectfully requests the Commission deny ATXI's Petition, but if the Commission grants ATXI's Petition, the Commission should adopt ATXI's proposed route as depicted in Figure 5 of Donnell Murphy's Direct Testimony on Rehearing (ATXI Ex. 3.0 (RH)) (the "ATXI-MCPO Route") for this portion of the project. For purposes of this Brief, the Partnership will only address the environmental impacts element of the least-cost analysis.

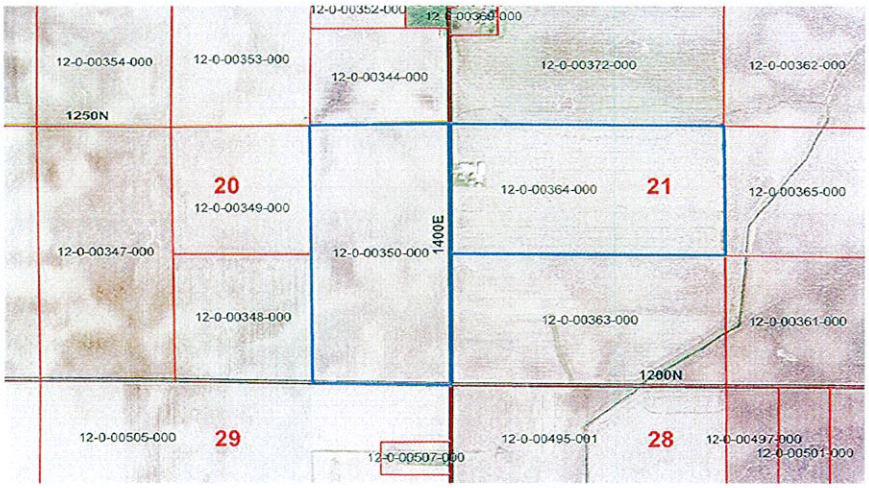
II. Environmental Impacts of the ATXI's Proposed Transmission Line on the Partnership's Property

A. The Property

The Partnership own two areas of land in Coles County (north of Charleston) that will be impacted by ATXI's Primary Route. The first parcels are adjacent to each other and have the PIN numbers: 12-0-00462-000 and 12-0-00610-000, a map of which is attached to the Partnership's direct testimony as Exhibit 1.1.

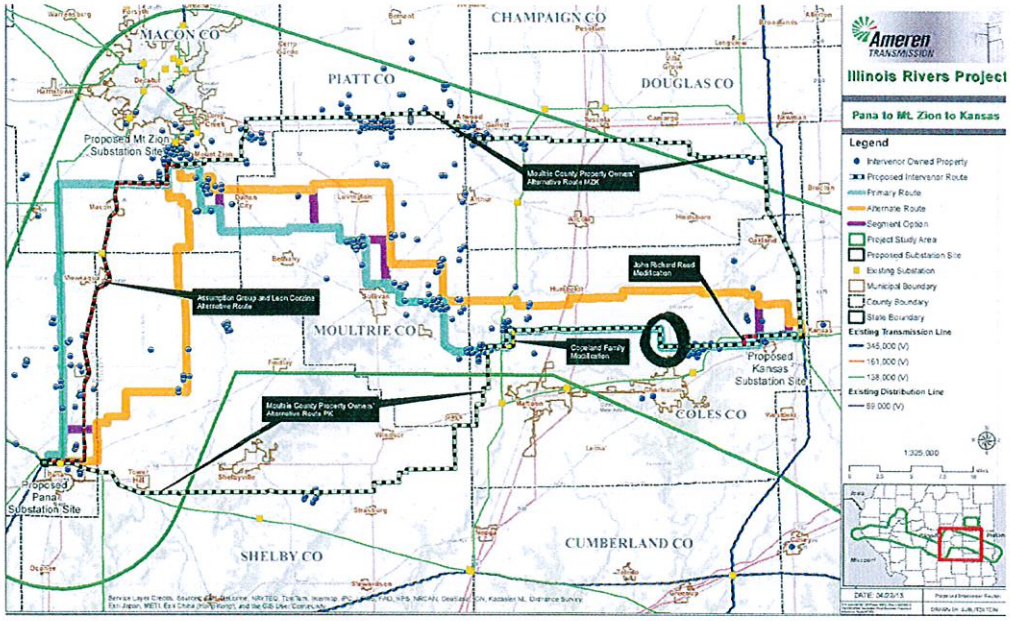
ATXI's proposed Primary Route splits the Partnerships' farm between the Section 26 and Section 35 line.

The second area of land are adjacent to each other and have the PIN Numbers 12-0-00350-000 and 12-0-00-364-000, a map of which is attached to the Partnership's Direct Testimony as Exhibit 1.2:



ATXI's proposed Primary Route travels north of Sections 20 and 21.

The Partnerships' Property, in the context of the overall project, is located in the area circled in black, in ATXI's Exhibit 13.7:



B. Environmental Impacts

The Partnership objects to ATXI's petition because of its intrusion on prime Illinois farmland. If the Commission grants the Petition, there will be numerous farmers adversely effected by significant obstacles the transmission line presents for a farmers farming operations.

If the Commission grants the Petition, then the Partnership requests that the Commission utilize the ATXI-MCPO Route because of the negative impact that ATXI's Primary Route will have on the Partnership's farming operations. The negative environmental impact on the Partnership's farming operations are as follows:

1. Soil Compaction: The transmission line towers will involve disrupting the soil. When construction equipment is continually operated over farm ground, there is a loss of yield at the location of the construction. When a person operates heavy equipment over farm ground, it impacts the ability of plant roots to penetrate to the soil to reach water and nutrients (e.g., fertilizer), which results in lesser or no yield. The Partnership is of the opinion that the soil will experience a reduction in yields for up to seven years.
2. Drainage: The Partnership has drainage tiles in the vicinity of the proposed Primary Route. The construction of the lines will likely disrupt or destroy the drainage tiles.
3. Aerial Spraying: The Partnership uses aerial spraying in its farming operations. The proposed placement for the Primary transmission line route will split the Property identified in Exhibit 1.1 in half. Both sides of the Property are used for agricultural purposes. The transmission line will make it difficult or impossible to conduct effective aerial spray applications. The Partnership does top air spraying which is 100 feet wide. Certain corn hybrids do need a fungicide application done by airplane at the time of tassel, which is done every year.

4. Field Efficiency: The possible placement of transmission line towers on the property will have a negative impact on field efficiency.
5. Weed Control: If the towers are placed on the Property, the Partnership will have to perform weed control on and around the towers. The presence of weeds reduces yield because the weeds will consume water and nutrients otherwise utilized by the corn or soybeans.

Direct Testimony of Intervener Louise Brock Jones, Exhibit 1.0, pgs. 2-3, lns. 45-68.

Moreover, the ATXI-MCPO Stipulated Route has the least impact on agriculture, overall. As set forth in the Donnell Murphy's chart, ATXI Ex. 3.1 (RH), the ATXI-MCPO Route impacts the least amount of prime farmland as compared to ATXI's proposed primary or alternative routes. See also Tables 1 and 2 from the Rebuttal Testimony on Rehearing of Rudolph K. Reinecke, MCPO Exhibit 2.0 (RH).

The Partnership acknowledges that not all of its concerns are not necessarily unique given the large number of farmers impacted by ATXI's Petition. The Partnership believes that the ATXI's proposed Primary Route will have a greater negative impact on its property because ATXI splits the Partnership's farm. By splitting the Partnership's farm, the Partnership will incur long term aggravation and annoyance that other farmers may not experience if the transmission line simply followed the edge of the farmers' property. Given the foregoing, the Partnership believes that the ATXI-MCPO Stipulated Route identified in Figure 5 of Donnell Murphy's Direct Testimony on Rehearing (ATXI Ex. 3.0 (RH)) best balances the concerns raised by the Intervenors in this docket.

III. Conclusion

As stated above, the Partnership objects to ATXI's Petition. If the Commission grants the Petition, the Partnership respectfully requests the Commission adopt the ATXI-MCPO Route.

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PROOF OF SERVICE

STATE OF ILLINOIS)
) SS
COUNTY OF MADISON)

I, Brian R. Kalb, BEING AN ATTORNEY ADMITTED TO PRACTICE IN THE State of Illinois and one of the attorneys representing LOUISE BROCK-JONES LIMITED PARTNERSHIP, hereinwith certify that I did on the 30th day of December, 2013, served the **BRIEF ON REHEARING OF LOUISE BROCK-JONES LIMITED PARTNERSHIP IN SUPPORT OF THE ATXI-MCPO PROPOSED ROUTE FROM MOUNT ZION TO KANSAS** by sending same by electronic mail.

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SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 30th day of December, 2013.

NOTARY PUBLIC OFFICIAL SEAL STATE OF ILLINOIS
JAMI MILLER
MY COMMISSION EXPIRES SEPTEMBER 21, 2014

NOTARY PUBLIC