

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 EDWARD CORLEY AND THE EDWARD CORLEY TRUST IN SUPPORT OF THE ATXI-MCPO STIPULATED ROUTE FROM MOUNT ZION TO KANSAS**

COMES NOW, Edward Corley and Edward Corley Trust (“Corley”) in Support of the ATXI-MCPO Stipulated Route from Mount Zion to Kansas on rehearing, and in support thereof, states as follows:

**I. Introduction**

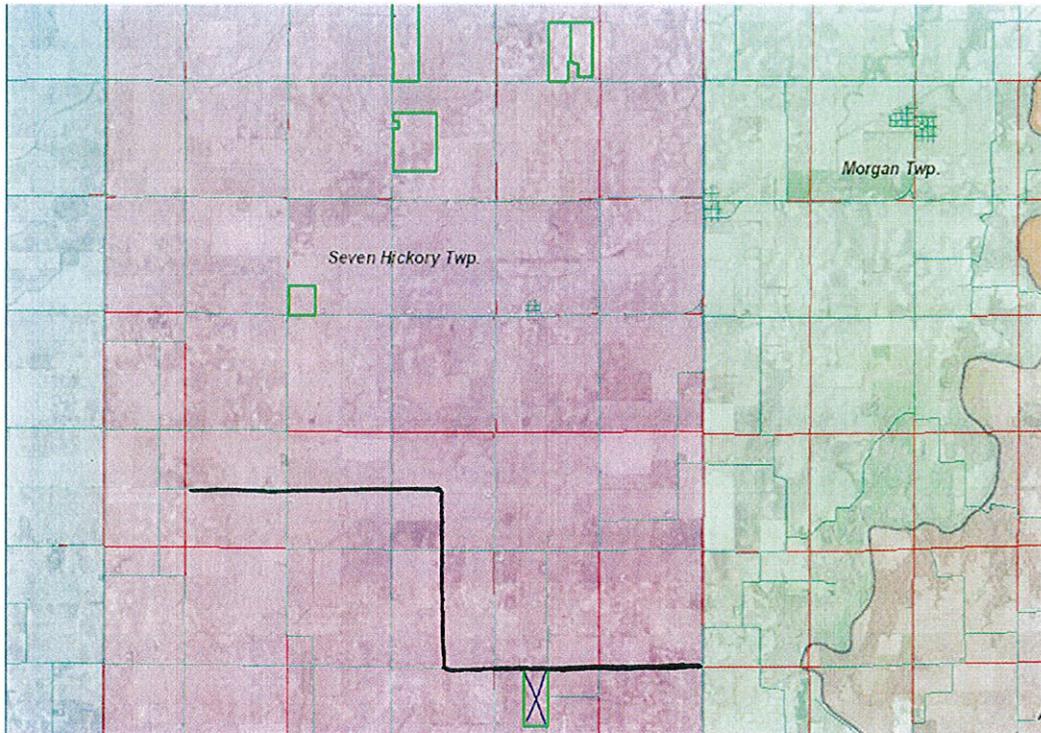
Corley files its initial brief in support of the ATXI-MCPO Stipulated Route from Mount Zion to Kansas. Corley owns to properties in Seven Hickory Township, Coles County, Illinois. The first property, PIN 12-0-00612-000, consists of 80 acres (the “Eighty Acres”), in which ATXI’s Primary Route crosses at the north border. The second property, PIN 12-0-00042-000, consists of 135.78 acres (the “135 Acres”), in which ATXI’s Alternative Route splits the farm in two. There was no evidence submitted by any of the Intervenors to change the original decision of the Illinois Commerce Commission (the “Commission”), and accordingly, the Commission should grant the ATXI-MCPO Stipulated Route as the route from Mt. Zion to Kansas.

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

### A. The Properties

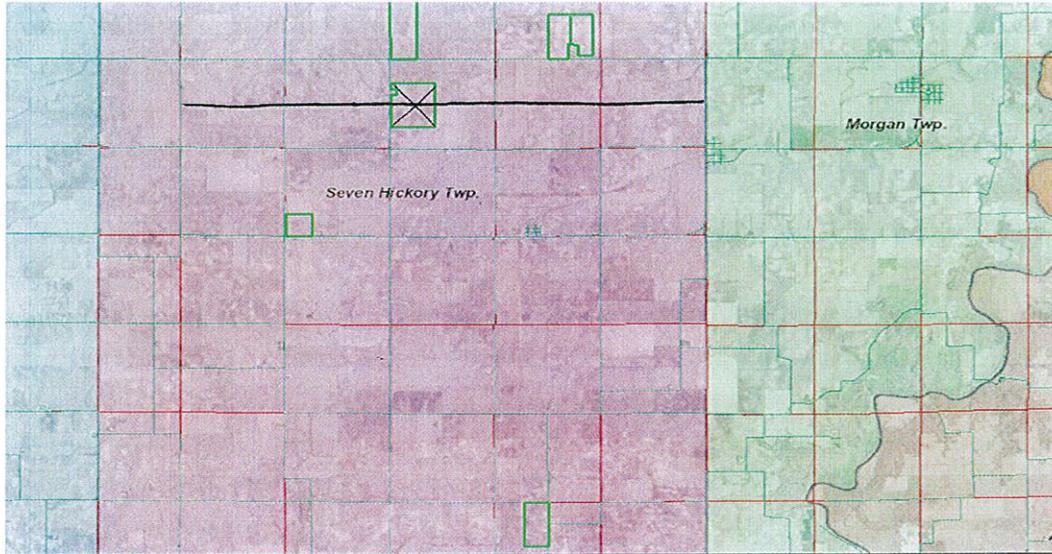
#### 1. The Eighty Acres.

The Eighty Acres will be impacted by ATXI's Primary Route. The below map depicts where ATXI's Primary Route impacts the Eighty Acres.

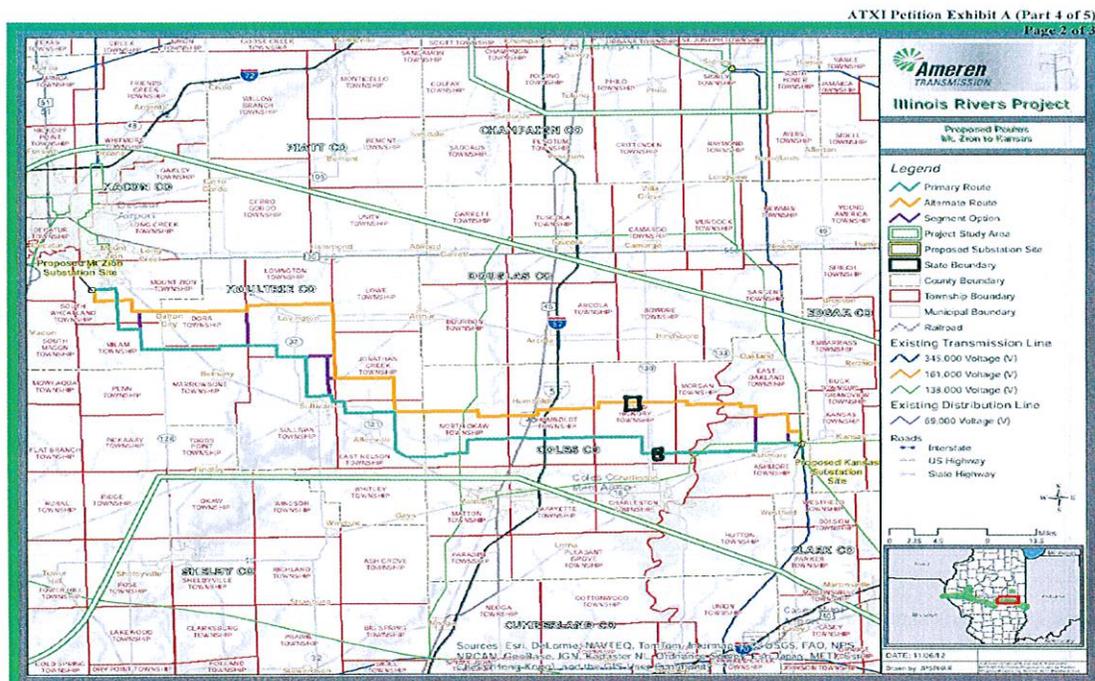


#### 2. The 135 Acres

The 135 Acres will be impacted by ATXI's Alternative Route, as supported by the Coalition of Property Owners and Interested Parties in Piatt, Douglas, and Moultrie County ("PDM"). As shown on the below map, ATXI's Alternative Route splits Corley's farm in two.



Corley's properties, in the context of the overall project, is located in the area shown in black, in ATXI's Exhibit A to its Petition.



## B. Environmental Impacts

Corley 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 lines present for a farmers farming operations.

If the Commission grants the Petition, then Corley requests that the Commission utilize the ATXI-MCPO Stipulated Route because of the negative impact that ATXI's Primary and Alternative Route will have on Corley's farming operations. There has been testimony in this docket regarding the negative environmental impact on farming operations, which include:

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. There has been testimony that the soil will experience a reduction in yields for up to seven years.
2. **Field Efficiency:** The possible placement of transmission line towers on the property will have a negative impact on field efficiency.
3. **Weed Control:** If the towers are placed on the Property, Corley 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, Ins. 45-68.

Moreover, ATXI's Proposed 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), and Page 13 of the Second Corrected Rebuttal Testimony on Rehearing and Exhibit 3 of James Dauphinais.

Finally, ATXI's alternative route splits the 135 Acres in two. The Commission should take into account the negative impact of farm splitting when considering the route. In this instance, ATXI's proposed Alternative Route literally splits the Corley farm in half, which makes Corley's farming operations inefficient, and will diminish the value of his property. The negative environmental impact should weigh against ATXI's Alternative Route in this regard.

### **III. Conclusion**

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



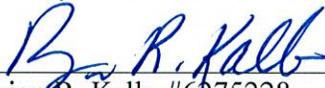
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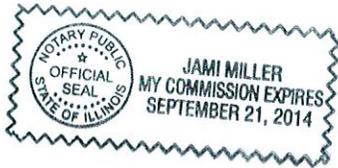
PROOF OF SERVICE

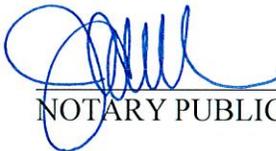
STATE OF ILLINOIS        )  
  ) SS  
COUNTY OF MADISON    )

I, Brian R. Kalb, BEING AN ATTORNEY ADMITTED TO PRACTICE IN THE State of Illinois and one of the attorneys representing, hereinwith certify that I did on the 30th day of December, 2013, served the **BRIEF ON REHEARING OF EDWARD CORLEY AND THE EDWARD CORLEY TRUST 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.



  
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NOTARY PUBLIC