

**C. Pawnee – Mt. Zion**

**1. Pawnee – Mt. Zion via Kincaid**

As discussed above, connecting the Project through Kincaid does not adequately address the services needs of Decatur and elsewhere. Thus, a Kincaid route is not a route that the Commission should consider. Moreover, the Pana routes ATXI recommends have been thoroughly vetted, while the Kincaid to Mt. Zion route has not. Staff witness Mr. Rockrohr testifies that a connection in Kincaid would allow for a shorter route segment than a connection in Pana, and therefore a Kincaid route would cost less to construct. (ICC Staff Ex. 2.0, pp. 7-8.) But beyond these two factors, no witness has testified that the Kincaid route is superior for any of the 12 routing criteria. Mr. Rockrohr acknowledged that he did not have an opportunity to meet with landowners along the route he identified, so it is possible information may be presented that the route is not ideal or viable. (*Id.*) No environmental assessment has been performed for the route, and it is unknown how many residences are in proximity to it. Thus, from a routing perspective, no reason emerges to approve the entire Kincaid route.<sup>3</sup>

- a. Length of Line**
- b. Difficulty and Cost of Construction**
- c. Difficulty and Cost of Operation and Maintenance**
- d. Environmental Impacts**
- e. Impacts on Historical Resources**
- f. Social and Land Use Impacts**
- g. Number of Affected Landowners and other Stakeholders**
- h. Proximity to Homes and Other Structures**

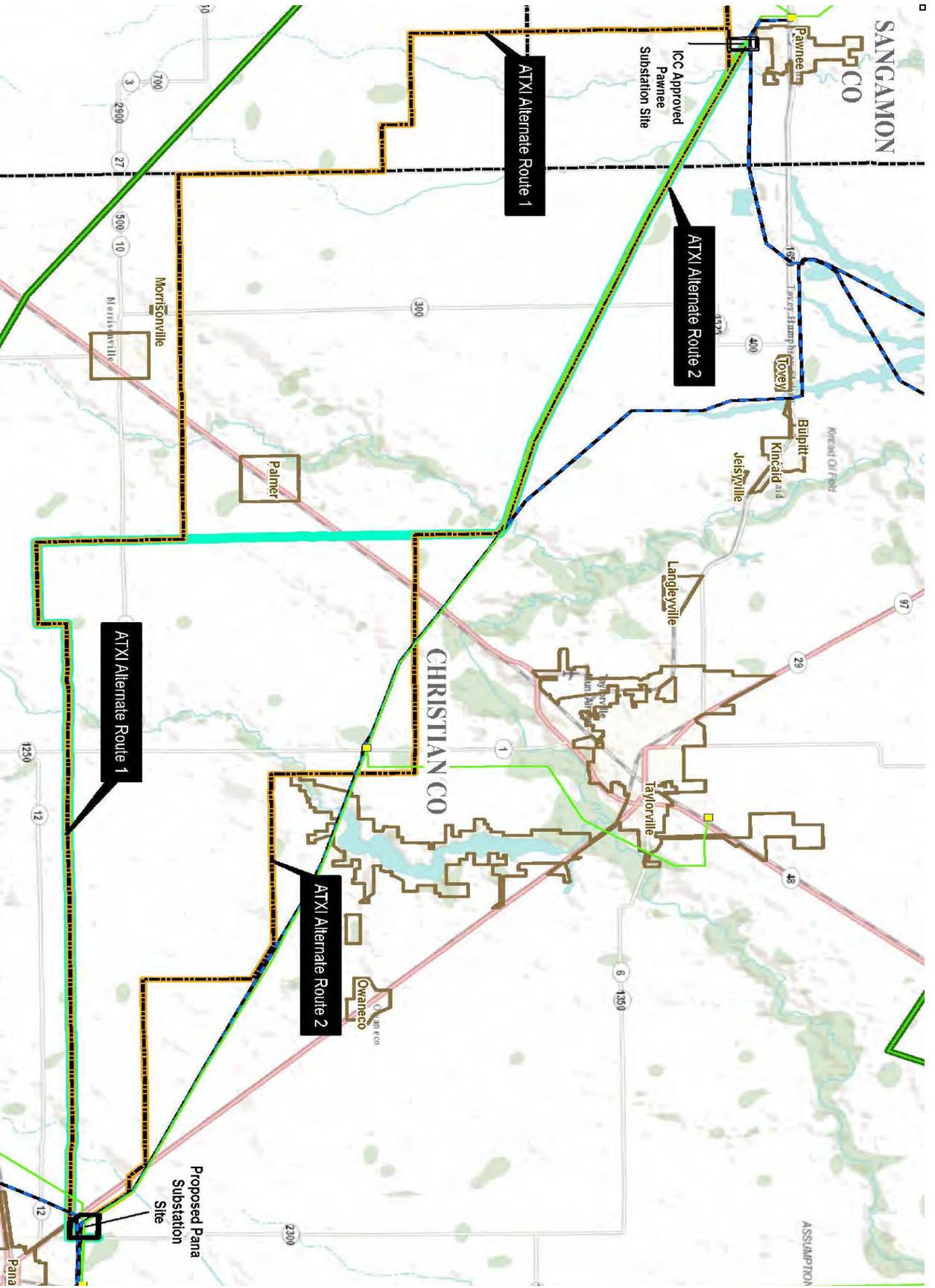
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<sup>3</sup> As discussed below, to utilize Staff substation option #2, ATXI proposes to use a segment of the Kincaid route east of ATXI's primary Pana to Mt. Zion route. ATXI did not identify any concerns with use of this portion of the Kincaid route. (ATXI Ex. 6.0 (RH), pp. 4-5.)



Should the Commission decide not to accept the modification, ATXI will work with Reynolds/Ramey during the final line design phase to address their concerns as best it can. As already explained in this proceeding, ATXI will coordinate with each landowner on pole placement and will make adjustments where feasible and appropriate to address site-specific concerns. (ATXI Ex. 16.0 (Rev.), p. 5.) Reynolds/Ramey will not be treated any differently.

ATXI Figure 3: Pawnee - Pana



Source: ATXI Ex. 3.0 (RH), p. 11, Figure 3.

**i. Length of Line**

	<b>ATXI Primary</b>	<b>ATXI Alternate Route 1</b>	<b>ATXI Alternate Route 2</b>
<b>Estimated Length in Miles</b>	34.4	38.5	32.3

(ICC Staff Ex. 1.0R, p. 39.)

**ii. Difficulty and Cost of Construction**

	<b>ATXI Primary</b>	<b>ATXI Alternate Route 1</b>	<b>ATXI Alternate Route 2</b>
<b>Estimated Baseline Cost</b>	\$65,868,000	\$78,780,000	\$65,018,000

(ATXI Ex. 16.3 (Rev.), p. 5.)

There is no record evidence indicating that Alternate Route 2 would be difficult to construct. To the contrary, as indicated by ATXI witness Ms. Donell Murphy, “[t]he land use crossed by [Alternate Route 2] is mostly agricultural with dispersed residential use and the terrain is mostly flat.” (ATXI Ex. 4.2, Part 1 of 100, p. 14.)

**iii. Difficulty and Cost of Operation and Maintenance.**

There is no record evidence indicating that the Alternate Route 2 would be more difficult to operate and maintain or that said route would be more costly to operate and maintain relative to the other routes proposed by ATXI along the Pawnee to Pana segment.

**iv. Environmental Impacts**

The Alternate Route 2 is expected to have minimal environmental impact. (See ATXI Ex. 4.0, pp. 8-10; see also ATXI Ex. 4.5, p. 3.) There is no record evidence indicating that the potential environmental impact resulting from construction of the Alternate Route 2 would be greater than that resulting from construction of the other routes proposed by ATXI along the

Pawnee to Pana segment.

**v. Impacts on Historical Resources**

There is no record evidence indicating that the Alternate Route 2 from Pawnee to Pana will substantially impact any historical resources. The Alternate Route 2 will not impact any known archeological sites and ATXI is unaware of any other historical resources that would prevent construction of the route. (*See* ATXI Ex. 4.5, p. 2.) ATXI will work with the IHPA to address issues that may arise during the construction process, and will obtain required permits or approvals, if any, before construction. (ATXI Ex. 4.0, p. 42.)

**vi. Social and Land Use Impacts**

The Alternate Route 2 reflects an optimum location for the Transmission Line in that it would limit societal and land use impacts. (*See* ATXI Exs. 4.0, pp. 8-10; 4.5, p. 1.) Such is true of all of ATXI's proposed routes, as each such route resulted from a comprehensive siting study and review. (*Id.*) Alternate Route 2 would not create social or land use impacts greater than those created by the other routes ATXI proposed along the Pawnee to Pana segment.

**vii. Number of Affected Landowners and other Stakeholders**

There are fewer landowners owning property within 250 feet of ATXI's Alternate Route 2 from Pawnee to Pana than there are landowners owning property within 250 feet of either the Primary or Alternate Route 1 along that same segment. (ATXI Ex. 5.4 (Rev.), pp. 17-20, 51-57.)

	<b>ATXI Primary</b>	<b>ATXI Alternate Route 1</b>	<b>ATXI Alternate Route 2</b>
<b>Potentially Affected Landowners</b>	142	183	127

(See ATXI Ex. 5.4 (2d Rev.), pp. 7-20, 51-57.)

**viii. Proximity to Homes and Other Structures**

None of the routes ATXI proposed would require displacement of any residences.

	<b>ATXI Primary</b>	<b>ATXI Alternate Route 1</b>	<b>ATXI Alternate Route 2</b>
<b>Residences within 0-75 feet of centerline</b>	0	0	0
<b>Residences within 75-150 feet of centerline</b>	6	11	7
<b>Residences within 0-500 feet of centerline</b>	14	27	17

(ATXI Ex. 3.1 (RH), p. 4.)

**ix. Proximity to Existing and Planned Development**

There is no record evidence indicating that the Alternate Route 2 from Pawnee to Pana is proximate to any existing or planned development.

**x. Community Acceptance**

The Alternate Route 2 from Pawnee to Pana, as well as ATXI's Primary and Alternate Route 1, resulted from a lengthy public input process. (See ATXI Ex. 4.8, Part 1 of 106.) Only one landowner opposes a small part of Alternate Route 2, based on generalized concerns about proximity of the line to their home, which may exist for any potentially affected landowner.

(Order at 83.)

**xi. Visual Impact**

Visual impacts, if any, will be substantially the same for any route along the Pawnee to Pana segment. There is no record evidence indicating that the recommended route is less

preferable from a visual impact perspective.

**xii. Presence of Existing Corridors**

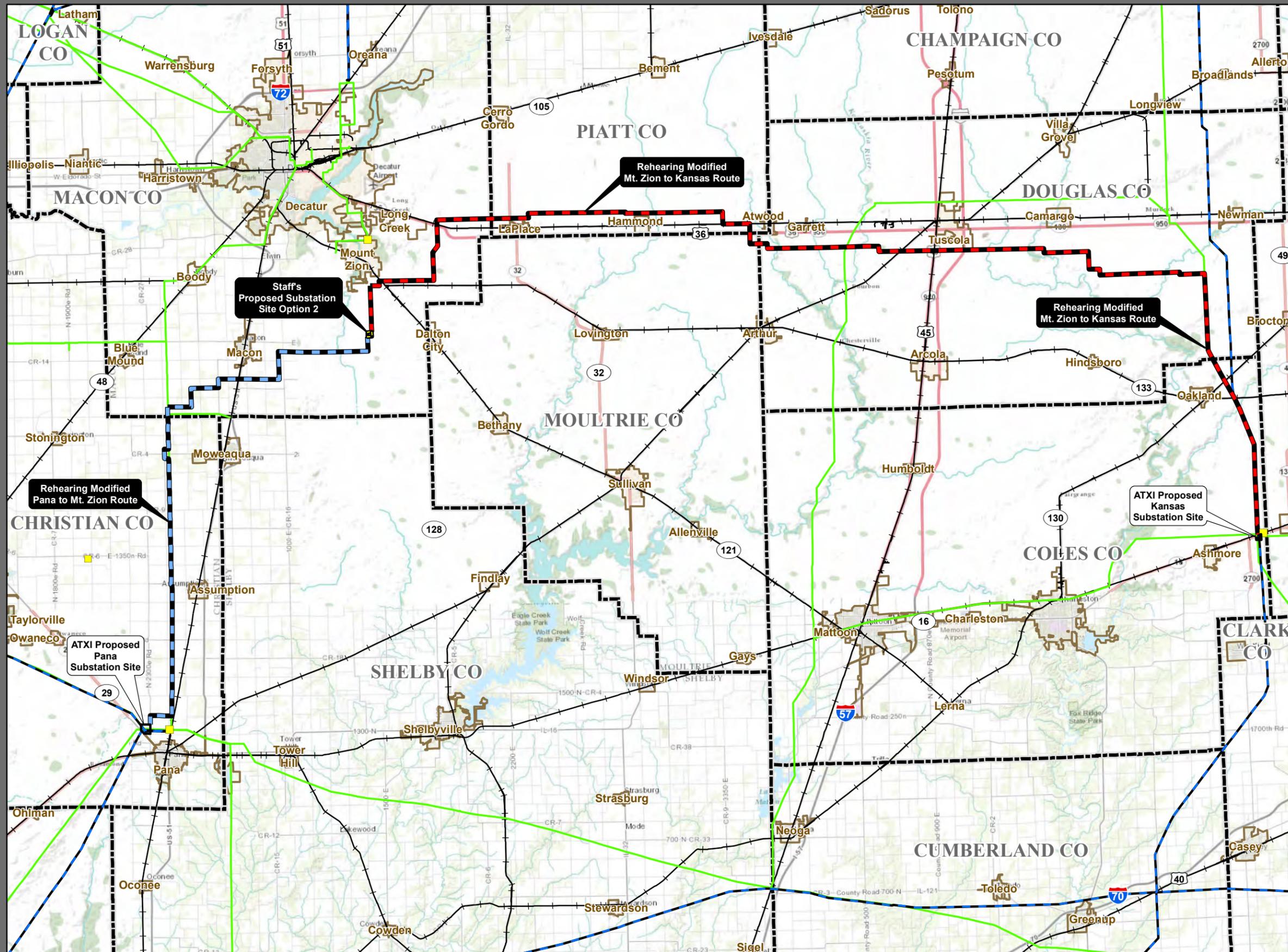
The Alternate Route 2 parallels an existing 138 kV transmission line for approximately 11 miles. (ATXI Ex. 4.2, Part 1 of 100, p. 14.) This route also parallels 138 kV lines along two additional stretches before terminating at the Pana substation. (*Id.*)

**b. Pana – Mt. Zion**

To utilize Staff substation Site Option #2, ATXI's Primary (Stipulated) Pana to Mt. Zion Route can be modified as follows: ATXI's proposed route would follow ATXI's Primary Route from the Pana substation until it meets Staff's proposed Kincaid route just north of the Christian/Macon County line. From that point, the route follows Staff's proposed Kincaid route until it meets Staff's Option #2 substation site, as shown on the following map. ATXI will refer to this route as the Modified Route.

ATXI Figure 4: Pana - Mt. Zion - Kansas

Stipulation Exhibit B



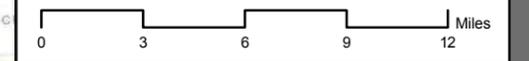
Illinois Rivers Project

Pana to Mt. Zion to Kansas

Legend

- Rehearing Modified Pana to Mt. Zion Route
- Rehearing Modified Mt. Zion to Kansas Route
- Staff Proposed Substation Site
- Existing Substation
- County Boundary
- Township Boundary
- Section Boundary
- Municipal Boundary
- Existing Transmission Line**
- 345,000 (V)
- 161,000 (V)
- 138,000 (V)

1:342,000



DATE: 12/06/13

DRAWN BY: JPS

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No party opposes the use of the Modified Route as a whole. Only one landowner, Mr. Eric Sprague, appeared on rehearing to express concerns with the Pana to Mt. Zion route. His concern is not with the route in its entirety, but the specific impact to his property. He wants ATXI to move structures so that the Transmission Line is on his neighbors' properties, and proposed three alternatives to accomplish this goal. (Sprague Ex. 1.0, pp. 7-14.) Of the three, Alternative 1 is not viable because it would continue to parallel an existing transmission line in such a manner as to require the displacement of at least one residence. (ATXI Ex. 3.2.) ATXI will work with Mr. Sprague during the final line design phase to address his concerns as best it can. As already explained in this proceeding, ATXI will coordinate with each landowner on pole placement and will make adjustments where feasible and appropriate to address site-specific concerns. (ATXI Ex. 16.0 (Rev), p. 5.) Mr. Sprague will not be treated any differently.

ATXI also recognizes that concerns were raised regarding the Kincaid route's relationship to certain property owned by the Macon County Conservation District, near where the Kincaid route crosses Highway 51 along the modified ATXI Pana to Mt. Zion route into Staff substation Site Option #2. (Tr. 376-77.) (See Figure 2.) At hearing, Mr. Rockrohr testified, "If ATXI cannot condemn the property and the property owner is unwilling to grant rights across it, that would render that route not viable." (Tr. 378.) A review of the location of the Macon County Conservation District property's location, however, shows the transmission line on the southern edge, and suggests it could simply be located across a property line to avoid the Macon County Conservation District property. (MCCD Exs. 1-3.) If the Commission determines that the presence of the Macon County Conservation District property is a bar to the Kincaid route, however, Staff substation Site Option #2 can still be utilized using some combination of existing proposed routes. (See Figure 2.) For example, a route using ATXI's

Primary Route from Pana to Mt. Zion to where it crosses ATXI's Alternate Route, then the Alternate Route, and then the tail end of the Kincaid Route would avoid the Macon County Conservation District property.

**i. Length of Line**

The Modified Route is 33.64 miles. (ATXI Ex. 5.1(RH) (Rev.), p. 1.)

**ii. Difficulty and Cost of Construction**

The estimated baseline cost to construct the Modified Route is \$59,853,000. (ATXI Ex. 5.1 (RH) (Rev.), p. 1.) There are no unique considerations along the Modified Route that would make it difficult to construct. (ATXI Ex. 3.0 (RH), p. 15.) From a routing perspective, there are no impediments to construction along the Modified Route from Pana to Mt. Zion (Staff's substation Option #2 as stipulated to between ATXI and Mt. Zion) via Staff's Kincaid route as the land is mostly agricultural and flat. (ATXI Ex. 6.0 (RH), p. 6.)

**iii. Difficulty and Cost of Operation and Maintenance**

There are no unique considerations along the Modified Route that would make it more difficult or costly to operate or maintain than any other. (ATXI Ex. 3.0 (RH), p. 15.)

**iv. Environmental Impacts**

The evidence shows the Modified Route will have minimal environmental impacts. (ATXI Exs. 4.5, p. 3, 4.0, pp. 8-10; 6.0 (RH), pp. 4-6.) Such impacts will occur regardless of the route approved by the Commission, in any event.

**v. Impacts on Historical Resources**

There is no record evidence that the Modified Route would impact any archeological or historical sites. (ATXI Ex. 4.5, p. 2.) Regardless of which route the Commission approves, ATXI will work with the IHPA to address issues that may arise during the construction process, and will obtain required permits or approvals, if any, before construction. (ATXI Ex. 4.0, p. 42.)

**vi. Social and Land Use Impacts**

The Modified Route will affect agricultural and rural land. (ATXI Exs. 3.0 (RH), p. 16; 6.0 (RH), p. 6.)

**vii. Number of Affected Landowners and other Stakeholders**

The Stipulated Route from which the Modified Route is derived would impact approximately 118 landowners. (ATXI Ex. 3.0 (RH), p. 15.) There is no indication that the number of landowners affected by the Modified Route would be materially different.

**viii. Proximity to Homes and Other Structures**

The Modified Route would not require displacement of any residences. (ATXI Exs. 3.0 (RH), p. 16; 3.1 (RH), p. 4.) There is no indication that the number of proximity to residences of the Modified Route would be materially different from the Stipulated Route.

**ix. Proximity to Existing and Planned Development**

The Stipulated Route is not near any existing or planned development. (ATXI Ex. 3.0 (RH), p. 16; 6.0 (RH), p. 6.)

**x. Community Acceptance**

The Modified Route, as a whole, is unopposed on rehearing.

**xi. Visual Impact**

The visual impacts, if any, will be substantially the same for any route. There is no record evidence that the Modified Route is less preferable considering visual impact than any other route proposed for this portion of the Project.

**xii. Presence of Existing Corridors**

The Modified Route utilizes county roads and property lines and parallels an existing 138 kV transmission line. (ATXI Exs. 4.2 (Part 1 of 100), p. 15; 13.7, p. 1.)

**D. Mt. Zion – Kansas**

In the initial proceeding, ATXI and MCPO stipulated to MCPO’s proposed route from Mt. Zion to Kansas (identified by MCPO as Route MZK). (Order at 86.) The Commission approved a portion of this route from the Macon/Piatt County border to the existing Kansas substation. (*Id.*) It did not approve a location for the Mt. Zion substation, or a route from that substation to the Macon County line.

On rehearing, ATXI and MCPO continue to recommend the Stipulated Route. Staff supports this route as well. (ICC Staff Ex. 4.0, pp. 17-18.) ATXI proposes a slight adjustment to the west end of the route to accommodate the Staff Mt. Zion substation Site Option #2 that was agreed to by ATXI and the Village of Mt. Zion: from Staff’s Option 2 substation site, the modified route uses ATXI’s Primary Mt. Zion to Kansas Route north to connect to the MCPO Stipulated route, which continues on to connect to the Mt. Zion to Kansas approved route. (*See* Figure 4) MCPO considers this adjustment acceptable. (MCPO Ex. 1.0 (RH) 2C, pp. 24-25.) Mt. Zion supports this modified version of the Stipulated Route. (Stip. Ex. 1 (RH).) MCPO refers to this modified route as “MZK-2.” For simplicity, ATXI will continue to refer to the MZK-2 as the “Stipulated Route.”

PDM and the Channon Family Trust (PDM/Channon) oppose the Stipulated Route regardless of which substation location is approved, and recommend the Commission reverse its August 2013 Order and advocate a route that would consist of the western portion of ATXI’s Primary Route, until it intersects with ATXI’s Alternate Route. From this point of intersection, their route proposal would then follow ATXI’s Alternate Route to the Kansas Substation. (PDM Ex. 6.0, pp. 4-5.)

ATXI can construct all of the routes proposed for this portion of the Project if ordered to do so. However, the approved route from Mt. Zion to Kansas came about as a compromise, by

ATXI, MCPO and Shelby County Landowners' Group. (Shelby County Land Owners' Group Exs. 1.1 (Amended) – 3.4.) The Stipulated Route incorporates the approved route, and is essentially the same as the route supported by those parties. The Village of Mt. Zion now supports the Stipulated Route as well. (Stip. Ex. 1 (RH).) PDM/Channon is the only group to oppose the Stipulated Route. But PDM/Channon has not presented any evidence on rehearing that warrants reversing the Commission's approval of the Stipulated Route.

Ultimately, the question for the Commission is what weight to give the 12 criteria with respect to these routes. No party disputes that the Stipulated Route is somewhat longer and more expensive to construct than PDM/Channon's hybrid route. (*See e.g.* MCPO Ex. 3.0 (RH), pp. 8-10.) But one key factor weighs heavily in favor of selecting the Stipulated Route, and it is a factor that the Commission considers one of the most important: proximity to residences. The Commission has previously approved transmission routes that are longer and more expensive to avoid being in proximity to residences.

Although the Staff proposal is longer and thus more costly, it provides, among other things, *an important benefit of avoiding the siting of high-voltage transmission lines in close proximity to residential dwellings.* Under the Staff proposal, there will be no dwellings within 500 feet of the line; whereas, under the Ameren proposal the line would be within 200 feet of two dwellings – a land use factor of “high sensitivity” according to Ameren's own selection process -- and within 500 feet of another three as described in testimony from Staff and the affected landowners. *The Commission believes this consideration is especially important inasmuch as the line in question is not a low or medium voltage line; rather, it is a high-voltage 345 kV line.*

*Ill. Power Co.*, Docket 06-0179, Order at 16-17 (May 16, 2007) (emphasis added).

And in this case, the Stipulated Route impacts substantially fewer residences. Depending on the count methodology, the Stipulated Route impacts from 3 to 12 residences, while the PDM/Channon hybrid impacts 15 to 35. (ICC Staff Ex. 4.0, p. 15; MCPO Ex. 4.0 (RH), p. 4.) This difference is significant and material, and based on past Commission decisions justifies an

extra nine miles and additional cost.<sup>4</sup>

The Stipulated Route also resolves the concerns of the clear majority of the parties affected by the various routes proposed for the Mt. Zion to Kansas portion of the Project. Of the 15 parties who own property along any of the routes proposed from Mt. Zion to Kansas, only PDM/Channon Trust oppose the Stipulated Route from Mt. Zion to Kansas. (ATXI Ex. 7.0 (RH), p. 9.) Staff also agrees the Stipulated Route is the best choice of the three route options for this portion of the Project. (ICC Staff Ex. 4.0, p. 17.) ATXI recognizes the Commission has said that despite any stipulation it will examine the record, however, the record supports the Stipulated Route. Moreover, the Stipulated Route is not simply a matter of stipulation signatories, but represents a compromise among these parties who had a variety of concerns with the routes they and others were proposing. Because of these factors, and more importantly the weight of the record, ATXI recommends the Commission re-approve the Stipulated Route, including the connection into Staff's Option 2 substation location, identified as Route MZK-2.

**1. Length of Line**

	<b>Recommended/ Stipulated Route (MZK-2)</b>	<b>PDM/Channon Hybrid Route</b>
<b>Estimated Length in Miles</b>	70.2	61.9

ATXI Ex. 5.1 (RH) (Rev.), p. 2; MCPO Ex. 2.2 (RH) (Rev.), p. 1.)

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<sup>4</sup> According to MCPO, this is eight miles. (MCPO Ex. 2.2 (RH).)

## 2. Difficulty and Cost of Construction

	<b>Recommended/ Stipulated Route (MZK-2)</b>	<b>PDM/Channon Hybrid Route</b>
<b>Estimated Baseline Cost (approx.)</b>	\$135M	\$120M

(ATXI Ex. 5.1 (RH) (Rev.), p. 2; MCPO Ex. 1.5 (RH).)

## 3. Difficulty and Cost of Operation and Maintenance

There is no record evidence the Stipulated Route would be more difficult or costly to operate and maintain relative to the other routes proposed. The record on rehearing also contains no meaningful distinction between the proposed routes regarding the difficulty or cost of operating and maintaining each that would warrant reversal of the Commission's approval of the Stipulated Route.

## 4. Environmental Impacts

The Stipulated Route has 32.6 fewer acres of wooded areas in the 500-foot corridor area than the PDM/Channon Hybrid Route. (MCPO Ex. 1.3 (RH).) There are also 1.2 acres of protected habitat within 500-feet of the PDM/Channon Hybrid route, but none within 500-feet of the Stipulated Route. (*Id.*) The Stipulated Route parallels more length of existing transmission lines where the elements have already been impacted. (MCPO Ex. 4.0 (RH), p. 2.) Because of this, the Stipulated Route has 40 (11.0%) fewer acres of minimally disturbed areas in the 500-foot study corridor than the PDM/Channon Hybrid Route. (MCPO Ex 4.2 (RH).) PMD/Channon have not offered any evidence on rehearing that would warrant reversal of the Commission's approval of the Stipulated Route.

## 5. Impacts on Historical Resources

The Commission found that impacts to historical resources, if any, would not impair the

ability to construct the Stipulated Route or either of ATXI's Primary and Alternate Routes in their entirety. (Order at 99.) There is no record evidence on rehearing considering impacts on historical resources that would warrant reversal of the Commission's approval of the Stipulated Route. Regardless of which route is approved, however, ATXI will work with the IHPA to address issues that may arise during the construction process, and will obtain required permits or approvals, if any, before construction. (ATXI Ex. 4.0, p. 42.)

#### **6. Social and Land Use Impacts**

The predominant land use along the routes proposed for this segment is agricultural in nature. The Stipulated Route impacts slightly more acres of prime farmland than the PDM/Channon Hybrid. (MCPO Ex. 1.3 (RH).) However, in its August 2013 Order, the Commission found that "the impact of a transmission line through area farm fields would be comparable regardless of the particular route." (Order at 99.) In addition, MCPO witness Mr. Reinecke also notes that social and land use impacts of the MZK routes can be mitigated where it follows previously fragmented natural features including existing transmission. (MCPO Ex. 4.0 (RH), pp. 2-3.)

PMD/Channon have not offered any evidence on rehearing on this criterion that would warrant reversal of the Commission's approval of the Stipulated Route.

#### **7. Number of Affected Landowners and Stakeholders**

There is no record evidence on rehearing regarding the number of landowners and stakeholders along this segment that indicates one route is superior over the other.

## 8. Proximity to Homes and Other Structures

	<b>Recommended/ Stipulated Route (MZK-2)</b>	<b>PDM/Channon Hybrid Route</b>
<b>Residences within 0-75 feet of centerline</b>	0	0
<b>Residences within 75- 150 feet of centerline</b>	0	9
<b>Residences within 0-500 feet of centerline</b>	12	31

(ATXI Ex. 3.1 (RH); MCPO Exs. 1.2, 2.2 (RH).)

The Stipulated Route has 72 fewer non-residential structures within 500 feet, 46 fewer within 300 feet, and 19 (61.3%) fewer within 150 feet of its centerline than the PDM/Channon Hybrid Route. (MCPO Ex. 2.2 (RH), p. 4.) There are also no non-residential structures within the 150-foot easement of the Stipulated Route. (*Id.*) In comparison, the PDM/Channon Hybrid Route has six non-residential structures within the 150-foot easement that may be displaced. (*Id.*)

## 9. Proximity to Existing and Planned Development

There is no record evidence the recommended Route MZK-2 is proximate to any existing or planned development. The PDM/Channon Route passes through a development area along Highway 121, east of the community of Sullivan. (ICC Staff Ex. 4.0, p. 17.)

## 10. Community Acceptance

ATXI, MCPO, the Shelby County Landowners Group, Staff and the Village of Mt. Zion support the Stipulated Route from Mt. Zion to Kansas. Of the 16 parties who own property along any of the routes proposed from Mt. Zion to Kansas, only PDM/Channon Trust oppose the Stipulated Route from Mt. Zion to Kansas. (ATXI Ex. 7.0 (RH), p. 9.) The Stipulated Route

also resolves the concerns of the clear majority of the parties affected by the various routes proposed for the Mt. Zion to Kansas portion of the Project and remains the optimal route option.

## **11. Visual Impact**

MCPO witness Mr. Dauphinais discussed the use of the existing linear features to avoid introducing new visual impact where none already exists. (MCPO Ex. 1.0 (RH) 2C, p. 16.) In this regard, he testified Route MZK-2 parallels 13.7 more miles of existing transmission lines than the PDM/Channon Route (MCPO Ex. 2.3 (RH).) Notably the Commission observed in its August 2013 Order, that running lines in parallel minimizes the 345 kV line's visual impact. (Order at 100.)

## **12. Presence of Existing Corridors**

Route MZK-2 parallels US Highway 36, and parallels 14.7 miles of existing 138 kV and 345 kV transmission lines. (ICC Staff Ex. 4.0, p. 17; MCPO Exs. 1.0 (RH) 2C, p. 10; 1.2.) MCPO performed an analysis that determined route MZK-2 has that relatively superior performance with regard to minimizing the portion of their length that does not parallel existing transmission lines, Major Roads or Railroad. (MCPO EX. 1.0 (RH), pp. 14-19.) Thus, although the PDM/Channon Hybrid follows roads, property lines, section lines and ½ section lines, (PDM Ex. 6.0, p. 13), the record does not support reversing the Commission's conclusion on the Mt. Zion to Kansas route for this criterion.

## **V. Certificate for Other Substations**

### **A. Resolved**

The Commission declined to approve new or expanded substations at Kansas, Sidney and Rising, but noted that it would revisit the issue "should new or additional evidence be presented to the Commission on rehearing . . . demonstrating the necessity of such a substation." (*Id.*) Rehearing presented the opportunity for ATXI to further explain the need for new or expanded

substations. Staff now agrees that ATXI's proposed substations should be approved at Kansas, Sidney and Rising.

### **1. Kansas Substation Site**

AIC's existing substation at Kansas is undersized to meet the needs of the Project. (ATXI Ex. 2.0 (RH), p. 15.) Therefore, ATXI plans to install a 345 kV breaker-and-a-half bus, a second 345/138 kV transformer, a 138 kV bus, and associated equipment at an expanded Kansas substation. (*Id.* at 13.) The breaker-and-a-half configuration was specified for the Kansas substation because the substation will initially have six connections. (ATXI Ex. 1.0 (RH), p. 29.) Good engineering practice dictates a breaker-and-a-half configurations in new 345 kV buses that have, or are likely to have, five or more connections, (*Id.* at 25-26.) Because space is not available to accommodate this configuration, ATXI has acquired property rights for 30 acres adjacent to the existing Kansas substation. (ATXI Ex. 2.0 (RH), p. 15.) Staff has no objection to ATXI's plans to expand the Kansas substation to install a six-position 345 kV bus with a breaker-and-a-half configuration. (ICC Staff Ex. 3.0, p. 13.)

### **2. Sidney Substation Site**

The Sidney substation presents issues similar to the Kansas substation. In Sidney, ATXI must install a 345 kV breaker-and-a-half bus, a second 345/138 kV transformer, a 138 kV bus, and associated equipment. (ATXI Ex. 2.0 (RH), p. 15.) The breaker-and-a-half configuration was specified because the Sidney substation will initially have five connections. (ATXI Ex. 1.0 (RH), p. 29.) As in Kansas, there is not enough land at the Sidney site to accommodate this configuration. (*See* ATXI Exs. 2.6 (RH), 2.7 (RH).) ATXI has acquired property rights for 39 acres adjacent to the existing Sidney substation, where the new equipment can be installed. (ATXI Ex. 2.0 (RH), p. 16.) Staff agrees that expansion of the site is necessary. (ICC Staff Ex. 3.0, p. 13.)

### **3. Rising Substation Site**

The need to expand the Rising substation also arises from a lack of space necessary to accommodate a breaker-and-a-half configuration. (ATXI Ex. 2.0 (RH), p. 18.) The Rising substation will have fewer than four connections initially, but ATXI anticipates that additional connections will likely be made in the future because of the substation's proximity to new generation resources and the MISO-PJM seam. (ATXI Ex. 2.0 (RH), p. 29.) What is different about Rising in comparison to the other two substations is that enough real estate is available at the existing AIC Rising substation to accommodate additional equipment. (*Id.* at 19.) Staff has no objection to ATXI's plans to expand the Rising substation. (ICC Staff Ex. 3.0 (RH), p. 14.)

#### **B. Contested**

##### **1. Ipava Substation Site**

The Commission previously found that AIC's existing Ipava substation was "sufficiently sized and capable of expansion such that it could handle the additional facilities required" by the Project. (Order at 55.) ATXI's evidence on rehearing proves otherwise.

Staff and ATXI agree that the buildable area at the existing AIC Ipava substation is not large enough to accommodate a six-position 345 kV breaker-and-a-half bus. (ICC Staff Ex. 3.0, p. 13.) But Staff because Staff believes that a substation capable of expansion to six positions is "wholly unnecessary," and recommends instead that ATXI terminate the Meredosia to Ipava transmission line at AIC's existing Ipava substation, after expanding that substation to accommodate a four-position ring bus. (*Id.*) AIC's existing Ipava substation currently has two connections. The Project would add a third, leaving only one spare connection.

Staff's proposal for a scaled-down Ipava substation would meet the immediate needs of the Project. But it would not meet future needs for additional connections that could occur at Ipava, due to its location near the MISO-PJM seam or due to potential system upgrades needed

following generation retirements. (ATXI Ex. 8.0 (RH), pp. 13-14.) ATXI's proposal would meet both immediate and future service needs. Although the new substation property would be configured to be expandable to accept six connections, only the four ring bus connections will be included in the Project costs. (ATXI Exs. 1.0 (RH), pp. 25-26; 2.0 (RH), p. 9.) It is far more economical to plan for six connections now than to build only four connections now, and an entirely new substation when it becomes necessary to have additional connections. The Commission should therefore approve ATXI's planned Ipava substation.

## **2. Pana Substation Site**

ATXI believes that the need for a new Pana substation is not contested, once the issue of whether the project should be routed through Pana or Kincaid is resolved. As far as ATXI is aware, no party disputes that if the Commission approves routes in and out of Pana, a new Pana substation is necessary.

Dated: December 30, 2013

Respectfully submitted,

Ameren Transmission Company of Illinois

By: /s/ Albert D. Sturtevant

One of their Attorneys

Edward C. Fitzhenry  
Matthew R. Tomc  
Eric E. Dearmont  
**AMEREN SERVICES COMPANY**  
One Ameren Plaza  
1901 Chouteau Avenue  
St. Louis, Missouri 63166  
(314) 554-3533  
(314) 554-4014 (fax)  
efitzhenry@ameren.com  
mtomc@ameren.com  
edearmont@ameren.com

Mark A. Whitt  
Shannon K. Rust  
**WHITT STURTEVANT LLP**  
88 East Broad Street, Suite 1590  
Columbus, Ohio 43215  
(614) 224-3911  
whitt@whitt-sturtevant.com  
rust@whitt-sturtevant.com

Albert D. Sturtevant  
Anne M. Zehr  
Rebecca L. Segal  
Hanna M. Conger  
**WHITT STURTEVANT LLP**  
180 N. LaSalle Street, Suite 2001  
Chicago, Illinois 60601  
(312) 251-3017  
sturtevant@whitt-sturtevant.com  
zehr@whitt-sturtevant.com  
segal@whitt-sturtevant.com  
conger@whitt-sturtevant.com

**CERTIFICATE OF SERVICE**

I, Albert Sturtevant, an attorney, certify that December 30, 2013, I caused a copy of the foregoing *Ameren Transmission Company of Illinois' Initial Brief on Rehearing* to be served by electronic mail to the individuals on the Commission's Service List for Docket 12-0598.

*/s/ Albert D. Sturtevant*

Attorney for Ameren Transmission  
Company of Illinois