Mr. Reinecke testified, "Those are the locations of the school sites that were provided to us. I cannot confirm whether there are schools there or not" (Id p.276, l.20 - p.277, l.1).

Mr. Reinecke confirmed that one of the school sites is in Marrowbone Township, Section 11, where the route runs up the west side and then east across the top of Section 11, on Rt.1500N (Tr. p.248, l.12-21). He then confirmed that there are no structures present anywhere in the north part of Section 11 (Id. p.249, l.3-8).

Mr. Reinecke confirmed that the second school site is in Humbolt Township, Section 11, where the route again runs across the top of Section 11 on Rt. 1500N (Id. p.249, l.9-20). He then confirmed that there are no structures within 37 feet of Rt. 1500 in that location (Id. p.250, l.7-10).

Mr. Reinecke testified that the third school site is in North Okaw Township, Section 9, where again the route runs along the north side of the section on Rt. 1500N (Id. p.250, l.11-20). Mr. Reinecke identified a structure on the south side of Rt. 1500N (Id. p.251, l.20-22), but could not testify whether such structure was a residence or something else (Id. p.252, l.2-7). Mr. Reinecke testified that he had possibly included that structure as a residence (Tr. p.253, l.4-7), and then testified as follows:

> Q. And since you have already testified that the route runs on the north side of 1500N, how can it be that this residence is, as you state, 14 feet from the centerline of the route?
>
> A. The school site data were data dots. I did not visually confirm whether or not they are active schools at those specific points.

(Tr. p.253, l.12-14). Staff witness Rockrohr testified that he did not find any schools on the Channon or Staff routes (Id. p.358, l.4-6).

MCPO's data on nonresidential structures is as unreliable as its data on schools. Mr. Reinecke's testimony on non-residential structures also underscores the unreliability of MCPO's

analysis. Mr. Reinecke testified that he did not physically view the structures other than by looking at them on an aerial map (Tr p.233, l.9-11). When asked about a structure identified in Section 9 of North Okaw Township, Mr. Reinecke testified that the route centerline was on the north side of Rt. 1500N (Tr. p.235, l.24 - p.236, l.5). However, he claimed one of his structures was 70 feet from the route centerline, and insisted it was on the south side of 1500N (Id p.236, l.6-10). When asked, "If the route is on the north side of 1500N, and if you say there is a structure within 70 feet of the centerline, doesn't that structure necessarily have to be on the north side of the road?," Mr. Reinecke insisted it did not, because the transmission line easement would be in the roadway (Id. p.239, l.21 to p.240, l.3, l.21-23).

Mr. Reinecke could not identify the type of structure or the specific location of any of the structures he had identified (Tr. p.241, l.3-10, l.17-23). Mr. Reinecke could only testify that all of the six structures he identified were either barns or grain silos (Id. p.242, l.6-9).

MCPO's analysis of "newly impacted homes" is also faulty. Mr. Reinecke testified that he noted how many homes on the MCPO route were already impacted by an existing transmission line because with respect to such homes "the impacts are reduced" (Tr. p.259, l.6-8). When asked why he did not make a similar deduction for homes on the Channon route that are previously affected by an existing transmission line, he testified, "Because there weren't any" (Id. p.259, l.9-13). But then Mr. Reinecke confirmed that there is an existing 138kV line running right through the middle of Sections 9 and 10 of North Okaw Township, where he had identified several homes as being proximate to the Channon route (Tr. p.260, l.6-15).

Aerial maps show at least 19 residences, and likely more, on the MCPO route. PDM witness Burns testified that she identified more residences along the MCPO route than either Staff

or MCPO did. She did this by reference to Google maps, using the MCPO route overlay provided by MCPO (see MCPO Cross Ex. 1, citing MCPO's Attachment 2 to DR PDML-MCPO 1.1, Part 1 "Mt. Zion to Kansas Rt."). She provided close-up aerial shots of these residences, which are contained in MCPO Cross Ex. 1. This exhibit lists residences Ms. Burns located within 530 feet of the MCPO route. She testified that to include a house 490 feet from the line but exclude one 520 feet from the line was hairsplitting, when the towers are 80 to 140 feet tall (PDM Ex. 8.0, p. 32, l.671-72). In addition, ATXI maintains 50 feet of flexibility on either side of the easement area to adjust the route centerline (see fn. 9 below).

The Commission can and should verify the accuracy of all the parties' varying residence counts by reference itself to Google maps, which will easily confirm that Ms. Burns' testimony is correct, and that both Staff and MCPO missed residences in close proximity to the MCPO route.[8] On the following pages, each of these easily verifiable residences is identified.

Residence 1. Upon leaving the Staff's proposed substation sites, the MCPO route travels north on Henry Road, and there is a residence, discussed above, which is in Mt. Zion Township, Section 15, on Henry Road just south of Wheeler Road. This home site is shown on MCPO Corrected Ex. 2.2, p.1 (immediately east of the "Rd" in Henry Rd). This residence was confirmed

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[8] Under Commission Rule 200-840(a)(7), the Commission may take administrative notice of all matters of which circuit courts may take judicial notice. In *People v. Stiff*, 391 Ill.App.3d 494, 503-04, 328 Ill.Dec. 664, 904 N.E.2d 1174 (5th Dist. 2009), the Appellate Court referenced Google Maps as a means of identifying two locations and the distance between them. The Illinois Appellate Court has held that it may use mapping services, such as Google Maps, whose accuracy cannot reasonably be questioned, to take judicial notice of distances between points. *People v. Clark*, 406 Ill.App.3d 622, 346 Ill.Dec. 386, 940 N.E.2d 755 (2nd Dist. 2010). In that case, the court stated, "Moreover, case law supports the proposition that information acquired from mainstream internet sites, such as MapQuest and Google Maps, is reliable enough to support a request for judicial notice." 406 Ill.App.3d at 633, 940 N.E.2d 755 at 766, 346 Ill.Dec. at 397.

by Mr. Rockrohr, who also confirmed that MCPO failed to include this house on its list of residences, as noted above.

Residence 2. The next residence is in Mt. Zion Township, Section 7, shown on MCPO Corrected Ex. 2.2, p.2, and is directly under the "7" identifying Section 7 of Mt. Zion Township on that map. A close-up of this residence is shown on PDM Cross Ex. 1, image #4. This residence was noted by both MCPO and by Staff. This residence is 170 feet east of the MCPO route centerline (MCPO Cross Ex. 1).

Residence 3. The next residence is located in Cerro Gordo Township, Section 29, and is located on CR 400E, just south of the MCPO route centerline. This area is shown on MCPO Corrected Ex. 2.2, p. 5. A close-up of this residence is shown on PDM Cross Ex. 1, image #14. This residence is 504 feet south of the MCPO route centerline (Id.). This residence was not identified by either MCPO or Staff.

Residence 4. The next 6 residences are all located in areas shown on MCPO Corrected Ex. 2.2, p. 9. The first four residences are located in Garrett Township, Section 5, and are found on CR 125E on both the north and south sides of the MCPO route. PDM Cross Ex. 1, image #5 shows one of the two residences on the south side of the route, being 139 feet south of the line. PDM witness Howard Kamm testified that his home on CR 125E is 135 feet from the MCPO route (PDM Ex. 2, p.1).