

Residence 17. The next 3 residences are located in Section 28, but also on the same CR 2700E. The first of these is in the far northwest corner of Section 28, and is shown on MCPO Cross Ex. 1, image #19. This residence is 317 feet east of the MCPO route centerline. This residence was identified by MCPO, but not by Staff.



Residence 18. Residence 18 is located across the street to the east from Residence 16 above, and is also shown on MCPO Cross Ex. 1, image #20, 380 feet from the MCPO route centerline. MCPO identified this residence, but Staff did not.



Residence 19. Residence 19 is at the south border of Section 28 on CR 1700N and is shown on MCPO Cross Ex. 1, image #21. This residence is located 525 feet west of the MCPO route centerline and was not noted by either MCPO or Staff.



In addition to these 19 residences which are plainly verifiable from reference to Google maps, there are likely more residences in close proximity to the MCPO route. For example, on MCPO Cross Ex. 1, image #12, directly across CR 2700E from the residence identified by all three parties (PDM, MCPO, and Staff) are two driveways leading to structures that may well be residences. It is not sufficiently clear from aerial photography whether these structures are residences, but that is likely given that each is separately served by its own driveway off of CR 2700E.



None of the routes requires the displacement of any home, nor even any structure.

Regardless of the exact number of residences impacted by the routes, MCPO witness Reinecke confirmed that the Channon route would not require the displacement of a single residence (Tr p.230, l.13-16). He noted that there is only one residence within 100 feet of the centerline on the Channon route (Id. p.231, l.20-22). While Mr. Reinecke had testified that the Channon route would require the displacement of 6 non-residential structures (Id. p.231, l.23 - p.232, l.3), he acknowledged that adjusting the pole placement by as little as 25 feet would avoid displacement of 5 of those 6 structures (Id. p.232, l.22 - p.233, l.2). ATXI gave notice to landowners on a 250-foot wide corridor in order to allow up to 50 feet on either side for flexibility in placing the ultimate right-of-way (Id. p.233, l.3-8).⁹ With such flexibility of 50 feet on either side of the centerline of the Channon route, none of the non-residential structures identified by MCPO would need to be displaced (see PDM Cross Ex. 1).

A differential in residences of 9 (or even 15), none of which will be displaced, cannot justify the much greater financial cost to ratepayers of the MCPO route. Ms. Burns testified that her review of the routes disclosed that there were 21 residences within 530 feet or less of the MCPO centerline, as compared to 30 residences within the same corridor on the Channon hybrid route (PDM Ex. 8.0, p.32, l.677-683), resulting in a difference of 9. Based on Mr. Hackman's baseline cost estimates, the MCPO route costs \$17,746,000 more than the Channon route, which means the reduction of impact on nine residences comes at a cost of almost \$2,000,000 per residence, not counting any of the other costs associated with the extra length of the MCPO route.

⁹ ATXI witness Murphy testified that there was at least 50 feet of flexibility on either side of the easement to allow for flexibility in placing the ultimate right-of-way. See ATXI's response to DR MCPO-ATXI 6.01 (introduced into evidence as PDM Ex. 8.14).

Even if MCPO's residence count, which has been shown to be inaccurate, is accepted, the reduction of impact on the additional residences comes at a cost of well over \$1 million each.

This factor also cannot justify the greater adverse economic impacts to farmland that the MCPO route has. Impact to residences is not ranked as highly by the public as agricultural use sensitivities. Staff witness Rockrohr testified that impacts to farmland, from bisecting farms or placing support structures in the middle of cultivated fields, have an economic cost, just like there is an economic cost associated with placing a line near a residence (Tr. p.348, 1.22 - p.349, 1.7). PDM witness Burns also noted that farm values are impacted by the presence of obstructions such as electric towers, citing 2013 Illinois Farmland Values and Lease Trends, published by the Illinois Society of Professional Farm Managers and Rural Appraisers, p. 17 (PDM Ex. 6.0, p.16, 1.338-341). For each one of the 9 additional impacted residences on the Channon/Staff routes, the MCPO route crosses an additional mile of farmland. And importantly, on most of the impacted residences, the easement is not even located on the residential property. By contrast, the MCPO easement cuts right through the middle of 103 farm properties. This more direct, adverse impact to farms far outweighs the incremental impact on residences.

Summary. In regard to proximity to homes and other structures, no clear conclusion can be drawn because the Commission is left to make assumptions on data that is demonstrably inaccurate. But two points are clear: the MCPO route avoids houses by splitting over 100 farm properties, and the structure counts, whatever they may accurately be, do not warrant the \$17 million additional cost of the MCPO route.