

Summary of Analysis of Opportunities for Route Paralleling

Route	Route Description	Length NOT Parallel to Existing Transmission Lines	Length NOT Parallel to Existing Transmission Lines / Major Roads / Railroads	Length NOT Parallel to Existing Transmission Lines / Major Roads / Railroads / Minor Roads / Utility	Length NOT Parallel to Existing Transmission Lines / Major Roads / Railroads / Utility / Section Lines
MZK	MCPO MZK from Sulphur Springs	54.5	53.0	49.3	39.8
MZK-1	MCPO MZK from Staff Option #1	56.0	52.5	48.5	39.8
MZK-2	MCPO MZK from Staff Option #2	55.5	50.0	48.5	39.8
CH	Channon Family Trust from Sulphur Springs	65.1	63.1	50.9	30.5
CH-1	Channon Family Trust from Staff Option #1	60.1	58.0	49.0	30.4
CH-2	Channon Family Trust from Staff Option #2	60.8	58.8	49.0	30.5
ATXIA	ATXI Alternate from Sulphur Springs	65.6	63.3	42.8	23.7
ATXIA-1	ATXI Alternate from Staff Option #1	65.1	63.1	42.3	23.0
ATXIA-2	ATXI Alternate from Staff Option #2	64.6	62.3	42.3	23.0

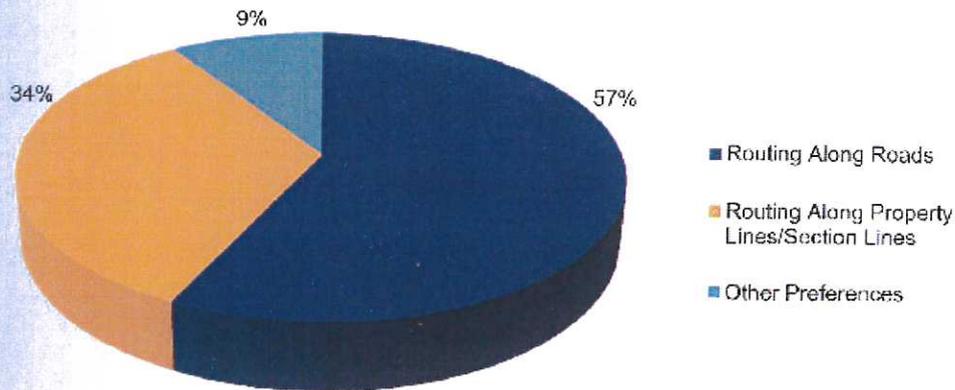
Scoring Key:	54.5	53.0	42.3	23.0
1.0 = In Relatively Superior Performance Band	65.1	63.3	50.9	39.8
2.0 = In Relatively Average Performance Band	38.1	55.5	45.1	28.6
3.0 = In Relatively Inferior Performance Band	61.8	59.9	48.0	34.2

82% of the Channon route follows existing corridors bisecting only 28 farm tracts; only 50% of the MCPO route follows existing corridors, and it bisects 103 farm tracts. PDM witness Burns prepared PDM Ex. 6.6, which summarizes paralleling opportunities on the Channon route and testified that it follows roads, section lines, and half-section lines coinciding with the property lines for 73% of the route (PDM Ex. 6.0, p.13, 1.259-261). An additional 9% of the route follows property lines which do not coincide with roads, section lines, or half-section lines (Id. 1.261-262). As a result, the Channon route bisects only 28 properties (Id.). By comparison, the MCPO route follows roads, section lines, and half-section lines coinciding with property lines for only 34%

of the route (Id. 1.269-271). Another 16% follows property lines, although these property lines do not coincide with roads, section lines, or half-section lines (Id. p.13, 1.271-272). The MCPO route bisects 80 properties, plus an additional 23 properties along the approximately 5.5-mile diagonal where the MCPO route parallels an existing transmission line, bisecting every parcel through which it passes (Id. p. 13, 1.272 - p.14, 1.280; see also PDM Ex. 8.8).

MCPO's route design disregards the public's preference for routing along roads, section lines and property lines. PDM Ex. 8.3 is MCPO's response to a data request listing the routing "opportunities" and routing "sensitivities" that MCPO considered in order of importance. MCPO's most important routing opportunity is "minimization of length not parallel to existing known electric transmission lines." Similarly, Mr. Dauphinais testified that paralleling of existing transmission lines was MCPO's "most important" routing opportunity (MCPO Ex. 1.0 (RH), p.16, 1.361-364, 376 to p.17, 1.382). MCPO's analysis does not reflect the public preference on siting opportunities. ATXI witness Murphy testified that "feedback suggested that greater preference be given to routing along roads" (ATXI Ex. 4.0, p.7, 1.150-151). ATXI Ex. 4.3, Appendix C, Part 8, p.6 (PDM Ex. 8.5) shows that public preference for routing along roads is rated at 57%, and routing along property lines/section lines is rated at 34%. All other parallel routing preferences are rated at 9%:

Preferences Related to Paralleling Linear Features



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Results of Phase II Exercise



MCPO witness Reinecke testified that half section lines were “not a defined opportunity in this proceeding” (MCPO Ex. 2.0, p.8, 1.173-174). Yet, as is abundantly clear from a review of MCPO Corrected Ex. 2.2, the route maps, the vast majority of the sections affected by the MCPO route are divided into half-sections and provide another opportunity to avoid bisecting properties when road and section line opportunities are not available. This is an opportunity MCPO ignored.

Even if the 14 miles of parallel transmission lines on the MCPO route is considered an advantage, the advantage is lost by the 13.5 mile detour to the north that the MCPO route takes. As the Commission, Staff and ATXI have all noted (discussed above), route design that

parallels existing transmission lines has numerous drawbacks. Yet even if such design were considered advantageous, the advantage is lost where this same MCPO route travels north and back south 13.5 miles before it ever begins to traverse the 11.25 miles south from the Option 1 site to the Kansas substation. It is one thing to argue, as on the Meredosia to Pawnee segment that the drawbacks of paralleling existing lines are offset by a substantial savings in route length and cost. Here, however, the drawbacks of paralleling on the MCPO route are in addition to more length and more cost.

Summary. The Channon and Staff routes clearly outperform the MCPO route in regard to the use of existing corridors, as MCPO admits. MCPO's routing does not respect the public's stated preference for routing along roads, section lines and property lines, splitting over 100 farm properties by cutting through the middle of farm after farm for over 27 miles.

Conclusion

The evidence and testimony clearly show that Staff's Option 1 site is the best location for the Mt. Zion substation site. The MCPO route would largely defeat the Commission's stated purpose in moving the substation south to that location.

The evidence and testimony also clearly show that 11 of the 12 factors favor the Channon and Staff routes over the MCPO route, and the data underlying the residences and structures factor is so uncertain, it cannot be reasonably relied on. Yet even if that factor supports the MCPO route, the combined economic impact of the other 11 factors simply eclipse any reasonable assessment of the impact of that single factor.

The Commission must exercise its judgment in evaluating the economic impact this factor presents, just as it must do so on the other factors. The Commission must consider what the loss in value is to a home where the impact is indirect, that is, the home does not need to be removed or relocated, and in most cases, the transmission line easement is across a roadway or not even located on the homesite. For example, if the Commission determined that such a loss would not exceed, on average, \$50,000 per residence, then this factor would have a total impact differential of well less than \$1 million, regardless of which party's residence counts are used.

The same consideration must be given to the other factors. The evidence is clear there is a \$17 million baseline cost differential. The Commission must consider what the loss in value to a farm is where the transmission line splits the farm, running right through the middle of a tract. This occurs 103 times on the MCPO route, 75 more times than on the Channon/Staff routes. This *direct* impact on a farm is at least as detrimental as the *indirect* impact on a residence. A differential of 75 farms, each suffering a \$50,000 impact, amounts to \$3.75 million.

Aside from the direct impact of farm splitting, MCPO states that its route impacts 1,118 more cultivated crop acres than the Channon route running from the Option 1 site. The Commission must consider what the loss in value is to an acre of impacted farmland. For example, if the Commission determined that prime central Illinois farmland is worth, on average, at least \$10,000/acre in central Illinois, and that there is an impact of at least 10% or \$1,000/acre, this impact differential amounts to over \$1 million.

The Commission must also consider what the loss is to the Amish community. While difficult to quantify this impact, it has a significant economic cost.

When farm impacts are considered, the construction cost differential, the additional operation and maintenance costs of the MCPO route, the economic costs to the Amish community, and all the other adverse impacts identified with the MCPO route, it is clear that any number of them individually exceed the impact differential of the residences. Weighed together, all these other factors simply eclipse any reasonable valuation for the impact to residences, clearly making the Channon and Staff routes the “least-cost” routes from Mt. Zion to Kansas.

Respectfully submitted,

Coalition of Property Owners and Interested Parties in Piatt, Douglas, and Moultrie Counties (“PDM”) and the Channon Trust,

By /s/ R. Kurt Wilke
One of Their Attorneys

R. Kurt Wilke - 06190769
Brittany Kink Toigo - 06306334
Barber, Segatto, Hoffee, Wilke & Cate
831 E. Monroe, P.O. Box 79
Springfield, IL 62705-0079
(217) 544-4868
(217) 544-5225 - fax
wilke@barberlaw.com
bk@barberlaw.com
225023

CERTIFICATE OF SERVICE

The undersigned, an attorney licensed to practice in the State of Illinois, hereby certifies that a copy of the foregoing instrument was filed and electronically served upon the individuals identified in the Illinois Commerce Commission's official service list for Docket No. 12-0598 on the 30th day of December, 2013.

/s/ R. Kurt Wilke