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Chairman Scott, Commissioner Colgan, Commissioner McCabe, Commissioner del Valle, Commissioner  
Maye  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

ILLINOIS  
COMMERCE COMMISSION  
JAN 17 2014  
Office of Chairman  
And Commissioners

Re: Case 12-0598

Dear Chairman and Commissioners:

I am Jan Lommele. I am writing to express my opposition to the proposed MCPO route through Piatt and Douglas Counties. I am a retired Chief Actuary from one of the largest professional services firms in the world and have 40 years of experience in my field. One of the major responsibilities of my professional life was to review the highly technical work of others in a financial reporting context and provide state and federal regulatory opinions on the degree to which the work was done in accordance with professional standards. After retirement, I was a visiting professor at the University of Illinois where I taught actuarial science to students and graduate students. I am a fifth generation owner of a farm in the Atwood area which has been in the Lommele name since 1865. I am pleased to be able to comment on this case, and I appreciate the complex issues which the ICC needs to address to make their decision. I know many (about 500) parties are deeply concerned about the MCPO route, and the waste and unnecessary impact it presents. I hope these comments are helpful to the Commissioners. I know it takes a huge amount of time to be fully informed on these complex issues.

I respectfully request that the ICC Chairman and Commissioners read and understand the testimony and case briefs, which are compelling in demonstrating that the MCPO route is a gross waste of ratepayers' money, and creates additional unnecessary adverse impact over the Channon/Staff routes. The Channon/Staff routes should be selected and the MCPO line proposal should be abandoned. While there are many components of waste and downright selfish interests that go into the MCPO route, a few of the highlights of the components are bulleted below:

- The MCPO route is 9.5 miles longer from substation option 1, unnecessarily wasting of ratepayers' money and causing unnecessary adverse environmental impacts
- The MCPO route wastes ratepayers' money as it costs \$17 million more to construct than the Channon/Staff routes
- The MCPO route travels 13.5 miles off course, 6.75 north and then 6.75 back south, causing additional unnecessary environmental impacts over the Channon/Staff routes
- MCPO's witness, R. Reinecke, testified that he had a route south of Route 36 which appeared to be better for a number of reasons, but MCPO never filed the more southerly route which would have gone through Moultrie County. It appears that MCPO simply wanted a route out of Moultrie County, and did not care about ratepayers' paying for waste or additional environmental impacts
- An ATXI witness, D Kramer, testified that MCPO's route was "primarily driven by a need to find a planning rationale to eliminate any route from traversing Moultrie County"
- The MCPO route creates hazards by unnecessarily crossing Route 36 twice, crossing existing power lines, and running parallel and very close to other lines for over one fifth of the total distance. Testimony indicates that this can create problems for maintenance and create reliability issues such as a storm bringing down two lines at once.
- ATXI stated in response to a data request that it did not develop routes to the north of Route 36 because that would require additional line length, which would increase cost and create a greater

potential for impact. MCPO's wasteful routing through Piatt and Douglas Counties is so far afield that the petition and case caption for the line construction do not even mention these two counties.

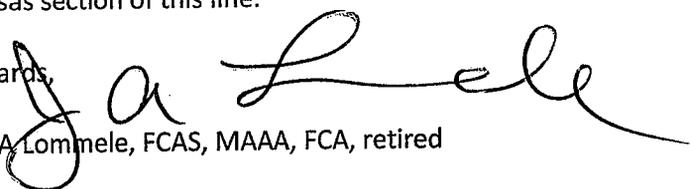
- Because the MCPO route is over 9 miles longer, easements will have to be purchased for 173 more acres of land, which is an additional waste of ratepayers' money and causes additional adverse environmental impacts.
- A common sense view of the geography of the MCPO line indicates that it will cost more to maintain a line 9 miles longer than another over similar geography (which we have in this part of the country), and the testimony in the case does not indicate otherwise. This is a waste of ratepayers' money.
- More miles of line on the MCPO means more structures to build and more line to maintain, which ought to indicate to the ICC and ATXI that the MCPO route is a waste of resources.
- The testimony indicates that from an engineering perspective, a longer line is less efficient than a shorter line, because there is less impedance.
- It makes no sense for the MCPO line to run through a native American archaeological site registered with the University of Illinois Archaeological Survey.
- The rehearing testimony showed unequivocally that the MCPO route is closer to and cuts through the historic Amish area and key access roads of Arthur than the Channon/Staff routes. Given the cultural attitudes of the Amish people, this is an adverse impact to a key historical area in the State of Illinois. Over 80 residents from the Arthur community area are members of the PDM group opposing the MCPO route (which has relatively few members). In the ICC's Final Order, it noted that affected communities and stakeholders had not intervened, and now there are over 500 parties from along the MCPO route who have intervened to show their opposition to the MCPO route.
- B Doan, who manages the Arthur Amish Community Welcome Center, testified that the MCPO line would cut through the triangle of the Amish community (Arthur, Tuscola, and Arcola) and have a negative effect on tourism. To say the least, a 345kV line running through this area is a travesty for the appeal of an area that exhibits what life was like when life was simpler and we had less technology.
- Dr. Emanuel, Director of the Aviation Institute at the University of Illinois, testified that the MCPO route would have an adverse impact on the Tuscola Airport for students and staff in the University's aviation training program. Towers that are 80 to 140 feet tall and only about 2,000 feet from the runway would pose a potentially fatal hazard to students who are learning to control small airplanes.
- On rehearing, MCPO admits that its route impacts more prime farmland than the Channon/Staff routes. Farmland in the PDM area is a valuable, diminishing resource in our country, and we cannot afford to unnecessarily take such land out of production. And, the MCPO route splits 103 farm properties, almost four times as many properties as the Channon/Staff routes. This will have an extremely adverse impact on sensitive and valuable agricultural land if the ICC allows the MCPO route to be constructed.
- According to testimony, MCPO's data shows that its route impacts 40% more farmland than the Channon/Staff routes.
- Unreliable aerial data has been used to estimate the impact of the number of residences affected by the respective routes, and both sides (MCPO versus Channon/Staff) admit this. MCPO made a demonstrably false assertion that three schools were affected by the Channon/Staff route; they admitted there were errors in their data. The testimony showed that many residences on the MCPO route were missing from their assertions on the number of residences affected by the MCPO route. This is a factor which cannot be reliably determined due to using data with material errors and the indications should be viewed with limited if any weight. However, none of the routes requires the displacement of any home.

- Eleven of twelve factors clearly favor the Channon and Staff routes over the MCPO route, and the one factor going the other way on residences impacted is based on data with material errors. It would seem that the ICC Chairman and any ICC Commissioner who was reasonable in viewing the considerations could only conclude that the Channon/Staff route is a much better value for ratepayers' money and the parties impacted than the MCPO route.

If there were a potential argument that Illinois ratepayers should not be concerned about the money because they will not pay all of it, my response is "waste is waste" and how much trouble have we created in our country with the attitude "it's not my money"?

Again, I respectfully request that you chose either the Channon or the Staff route for the Mt. Zion to Kansas section of this line.

Regards,

  
Jan A. Lommele, FCAS, MAAA, FCA, retired