

January 11, 2014

Mr. Doug Scott
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

ILLINOIS
COMMERCE COMMISSION
JAN 21 2014
Office of Chairman
And Commissioners

RE: ICC Case 12-0598/Opposition to proposed reroute through Douglas and Platt Counties

Dear Commissioner Scott,

CASE #12-0598

Below is your Mission Statement

The ICC's mission is to pursue an appropriate balance between the interest of consumers and existing and emerging service providers to ensure the provision of adequate, efficient, reliable, safe and least-cost public utility services.

For all of the following reasons, the ICC should reject the MCPO-proposed reroute through Douglas and Platt Counties and select either the Channon or Staff route, both of which are comprised of Ameren's carefully studied and properly vetted original routes through Moultrie County:

- First and foremost, the Channon/Staff routes are "the least cost" and they clearly outperform the MCPO route on 11 of the 12 statutory factors the ICC is supposed to use to decide this case.
- In regard to the deciding factors, the MCPO route is over 9 miles longer than the Channon/Staff routes.
- The MCPO route would cost \$17 million more to construct than the Channon/Staff routes.
- The MCPO route would include 50 more towers and spans than the Channon/Staff routes, thereby increasing maintenance costs, environmental and visual impacts, damage to property, the chance for weather-related outages, and danger to the public.
- The MCPO route splits 103 family farms (4x the Channon/Staff routes) by placing these massive towers and high-voltage lines right through the middle of cultivated field after cultivated field for over 27 miles! In stark contrast, the Channon/Staff routes reflect public input by attempting to follow roads, section lines, and property lines.
- The MCPO route would place these massive towers and high-voltage lines unnecessarily close to multiple towns (within 1/4 to 1/2 mile in several cases), negatively impacting property values, community aesthetics, and future community growth and development.
- The MCPO route would include SIX 90° turns in just over 2 miles while crossing over US 36 and the Arthur Road into the Amish Community. Running these massive high-voltage towers and lines through the gateway to the Amish Community would be

devastating to this unique, historic area and would forever destroy the area's beautiful, rural sight lines, which annually draw visitors from around the globe.

- Regarding opposition, over 500 Individual Intervenors representing communities *across* the 70+ mile MCPO route have formally recorded their opposition to the MCPO route with the ICC.
- Those 500+ Intervenors represent over 10 times the number of people who are supporting the MCPO route.
- In contrast, the Channon/Staff routes align with the interests of *every* Intervening party in this rehearing (except for MCPO), and based on the lower cost of the Channon/Staff routes, Ameren and Illinois ratepayers would benefit from them as well.
- The MCPO route travels miles off course to the north and negatively impacts more cropland, more property owners, and far more communities.
- The MCPO route, with its massive towers, runs directly across the historic Amish community, right through a registered Native American archeological site, and right next to the widely used Tuscola airport, which is used as a training site for over 91 University of Illinois Flight School students.
- Looking back, the MCPO route through Platt and Douglas Counties was developed by SIX Moultrie County property owners in less than *three weeks*, and *NO public forums or public meetings have ever been held in connection with the MCPO route*.
- In stark contrast, the Channon/Staff routes follow Ameren's original, properly vetted routes through Moultrie County, which Ameren spent *years* studying, reviewing, publicizing, and refining based on feedback from multiple public forums and a review of 32 different geographic sensitivities.
- As an additional outrage and as a final piece of evidence displaying how *far off course* the MCPO route travels, Platt and Douglas Counties *were never even selected* by Ameren as project routing sites, and they were *not even included* in Ameren's formal petition to the ICC.

In conclusion, the Channon *and* Staff routes outperform the MCPO route on 11 of the 12 statutory factors, clearly making them "the least cost" options in this rehearing. As a result, the ICC should reject the longer, more costly, and far more destructive MCPO route through Douglas and Platt Counties!

Respectfully,



Elizabeth Jones

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Atwood, IL 61913