

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Ameren Transmission Company of Illinois	:	
	:	
Petition for a Certificate of Public	:	
Convenience and Necessity, pursuant to	:	
Section 8-406.1 of the Illinois Public Utilities	:	
Act, and an Order pursuant to Section 8-503	:	
of the Public Utilities Act, to Construct,	:	12-0598
Operate and Maintain a New High Voltage	:	
Electric Service Line and Related Facilities	:	
in the Counties of Adams, Brown, Cass,	:	
Champaign, Christian, Clark, Coles, Edgar,	:	
Fulton, Macon, Montgomery, Morgan,	:	
Moultrie, Pike, Sangamon, Schuyler, Scott	:	
and Shelby, Illinois.	:	

APPENDIX A
TO MCPO BRIEF ON EXCEPTIONS
ON REHEARING

DATED: January 29, 2014

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X. MT. ZION-KANSAS SEGMENT

C. Moultrie PO Position¹

On rehearing, Moultrie PO analyzed a number of permutations of line routes for the Mt. Zion to Kansas segment of the IRP, based on the possible line routes that remain relevant at this stage of the proceedings and the viable options for the location of the Mt. Zion substation. It appears to Moultrie PO that the line routes that remain in play on rehearing at this time are the Moultrie PO/ATXI Stipulated Route (MZK, MZK-1 and MZK-2) and the PDM/CFT Routes (CFT, CFT-1 and CFT-2). Moultrie PO believes that for any of these routes and substation locations, the routes proposed by Moultrie PO significantly outperform all other potential routes, or permutations of them, when all relevant factors are considered. Moultrie PO asserts that the superiority of the MZK Routes is truly demonstrated when a primary consideration is given, as it should be, to the actual impact on human beings, reflected by the proximity of a large high voltage 345 kV lines to residential structures, as opposed to the mainly economic impacts on farmland, prime or otherwise. These impacts on human beings include, among others, health and safety concerns in the event a line goes down as the result of storms or other causes, and aesthetic and quality of life considerations resulting from having to view and live with high tension transmission structures within a few hundred feet of one's home. In this important criterion, Moultrie PO notes that all of the MZK routes impact nine fewer residential structures within 150 feet of the centerline, regardless of substation location, than the routes advocated by PDM/CFT. Within 500 feet of a centerline, Moultrie PO states the MZK routes impact nineteen fewer residential structures than the PDM/CFT routes. There are also no structures that have to be removed on the MZK route, while Moultrie PO contends there are as many as six (6) non-residential structures that will have to be removed on the PDM/CFT routes.

Based on Staff's proposed Option #2 site for the Mt. Zion substation, the parties are currently offering two route alternatives for the Mt. Zion to Kansas portion of the IRP. ATXI, Staff, Mt. Zion and Moultrie PO are supporting Route MZK-2, which consists of the ATXI Primary Route north from the Staff Option #2 site to the intersection with the May 10, 2013, ATXI/Moultrie PO stipulated route from Mt. Zion to Kansas, referred to in the direct testimony of Moultrie PO witness Mr. Dauphinais as "Route Segment Moultrie PO MZK", and then east on route segment Moultrie PO MZK to Kansas. This is the ATXI-Mt. Zion stipulated route from Mt. Zion to Kansas.

Moultrie PO notes that PDM/CFT is supporting a route which consists of ATXI's Mt. Zion to Kansas Primary Route from Staff's Option #2 substation site to the junction with ATXI's Mt. Zion to Kansas Alternate Route in East Nelson Township and then ATXI's Mt. Zion to Kansas Alternate Route from the junction to Kansas substation, the PDM/CFT Route. Other routes have been proposed in the past in this proceeding by

¹ The Commission notes that Moultrie PO included extensive discussion for this segment of the route based on the various Mt. Zion substation locations. As the Commission has opted for Staff Substation Option #2, that portion of Moultrie PO's discussion is all that will be included in the Order.

ATXI and Staff from the Staff Option #2 site for the Mt. Zion to Kansas portion of the IRP; however it appears to Moultrie PO that Route MZK-2 and PDM/CFT Route are the only routes currently being actively proposed by the parties for use with the Staff Option #2 site.

1. Length of the Line (Exception #1)

Moultrie PO states that Route MZK-2 is 8.3 miles (13.4 %) longer in length Route CHANNON-2 (Route CFT-2). All else being equal, Moultrie PO suggests notes that PDM/CFT suggests that because the Stipulated Route/Route MZK-2 is longer, it has greater impacts. Moultrie PO disagrees and observes that with regard to the Mt. Zion to Kansas segment, all else is not equal. Moultrie PO states that, despite being longer, the Stipulated Route/Route MZK-2 Moultrie PO suggests that the length of a route affects its cost and adverse impact; however, Moultrie PO believes that caution must be used when using length of a route as a factor as often all else is not equal. Moultrie PO submits that this in particular is the case for the segment from Mt. Zion to Kansas. impacts significantly fewer residential and nonresidential structures than the shorter PDM/CFT route (Route CFT-2). Moultrie PO also observes that its witnesses identified the substantial benefits of its route due to paralleling 14.7 miles of existing transmission lines in the form of mitigation of visual impacts, noise and environmental fragmentation, compared to the shorter PDM/CFT route where there is less such paralleling. Moultrie PO also notes that in phase one of these proceedings, the Commission suggested that it is "preferable" to parallel existing transmission lines where the choice is to place the line in an area that currently lacks any similar linear features, noting that a second line will have less visual impact than a line in an area currently untouched by transmission lines.

Moultrie PO also addressed PDM/CFT assertions that the Stipulated Route/Route MZK-2 involves unnecessary off course detours. Moultrie PO observes that the Stipulated Route/Route MZK-2 was designed to avoid residences and non-residential structures, does so with great success, and does not involve any "unnecessary" detours. Moultrie PO also notes that PDM/CFT made similar arguments to the Commission in phase 1 of these proceedings; that the Commission was not persuaded by this argument in that phase of the proceedings and that PDM/CFT has introduced no evidence in the rehearing proceedings that would justify acceptance of these arguments. Furthermore, Moultrie PO points out that the Commission has already approved routes for line segments in this case that have greater length than the other alternate routes considered for those line segments.

2. Difficulty and Cost of Construction (Exception #2)

To the best of Moultrie PO's knowledge, ATXI's witnesses have not identified any insurmountable difficulties with constructing Route MZK-2 or the PDM/CFT Route. In ATXI's response to data requests, baseline construction cost estimates for Routes MZK-2 and the PDM/CFT Route were provided, and the baseline cost estimate for Route MZK-2 is approximately \$15.2 million (12.7%) more than the PDM/CFT Route.

However, Moultrie PO notes that Illinois customers will pay only 9% of the cost of the IRP due to MISO multi-value project cost sharing, therefore, those customers will only pay \$1.36 million more in costs for the additional costs for construction of MZK-2 over the PDM/CFT Route.

Moultrie PO also addressed PDM/CFT's assertion that the additional length of the Stipulated Route/Route MZK-2 will require ratepayers to incur significant additional cost to acquire easements for additional acreage associated with the longer route length. Moultrie PO states that the record shows that the baseline cost estimates of the routes prepared by ATXI already include right-of-way and environmental costs, so there would be no incremental costs over the baseline cost estimates for acquiring easements associated with the Stipulated Route/Route MZK-2 versus the PDM/CFT route.

Moultrie PO observes that PDM/CFT suggests that ATXI witness Hackman identified certain construction difficulties associated with paralleling existing transmission lines. Moultrie notes, however, that Mr. Hackman testified that the Stipulated Route/Route MZK-2 is constructible and in fact he recommends construction of this route. Moultrie PO further states that no party has specifically testified that the Stipulated Route/Route MZK-2 will be more difficult to construct than the PDM/CFT route, nor has there been any quantification of additional costs, if any, associated with constructing a new transmission line in parallel with an existing transmission line on the Stipulated Route/Route MZK-2.

3. Difficulty and Cost of Operation and Maintenance (Exception #3)

To the best of Moultrie PO's knowledge, none of ATXI witness identified any differences between Route MZK-2 and the PDM/CFT Route with regard to the difficulty and cost of maintenance. Moultrie PO noted several concerns raised by PDM/CFT with regard to this factor which PDM/CFT claims are associated with the Stipulated Route/MZK-2 Route, including operational and spacing concerns related to paralleling of existing lines, proportionate cost increases of a longer line and additional structures, accessibility and impedance concerns. Moultrie PO indicates it has addressed these concerns in its Initial and Reply Briefs and notes that: (i) such concerns are groundless and contrary to the evidence of other witnesses, and/or (ii) PDM/CFT has failed to quantify any of the additional costs that might be associated with the concerns, if any, or that any such costs are significant. Regarding alleged operational issues related to paralleling, PDM/CFT observes that ATXI Witness Hackman raised such concerns with regard to ATXI's recommendations relating to the Meredosia to Pawnee line segment. However, Moultrie PO notes that the uncontroverted testimony of Mr. Hackman clearly stated that the paralleling concerns associated with the Meredosia to Pawnee segment do not pertain to the Mt. Zion to Kansas segment and that ATXI's recommendation as to the Mt. Zion to Kansas segment is not therefore inconsistent with his recommendation regarding the Meredosia to Pawnee segment.

With regard to PDM/CFT's assertion that sufficient space has not been provided to mitigate transmission line paralleling issues, Moultrie PO observes that no witness, including PDM/CFT's own witnesses, testified to any such conclusion on the record in these proceeding, and that, despite PDM/CFT's representations as to Staff's statements on the issue, Staff supports the Stipulated Route/Moultrie PO Route. Moultrie PO also notes that an aerial photographs which PDM/CFT included in its Brief to demonstrate that there is insufficient space between the Stipulated Route/Route MZK-2 and existing transmission lines lacks a scale, so no determination can be made about what distances are actually involved, nor does PDM/CFT even define the terms it uses, such as "sufficient" space or "too close". However, it is clear from the photographs that two existing transmission lines already exist that are in very close proximity to one another. Furthermore, Moultrie PO points out that the ATXI construction expert has testified the stipulated Route MZK-2 was constructable and PXM/CFT offered no expert testimony on it own to the contrary.

Moultrie PO notes that, despite PDM/CFT's claim that Staff testified that the longer route is more costly to operate and maintain, Staff does not in fact take that position with regard to the Stipulated Route/Route MZK-2 in its Brief. Furthermore, Moultrie PO observes that PDM/CFT ignores ATXI Witness Hackman's unrefuted testimony that, once the transmission line structures are in the ground, minimal maintenance must be conducted. Mr. Hackman supported his conclusions, noting that repairs of such lines are not routine and that many of their wires haven't been touched in 80 years. With regard to alleged issues of impedance and exposure, Moultrie PO points out PDM/CFT's concerns were generic, unquantified, and provide no indication of the significance of the concerns. Moultrie PO further notes that ATXI, who must build and maintain the line, did not identify any differences between any of the MZK routes and the PDM/CFT Route with regard to the difficulty and cost of operation and maintenance.

4. Environmental Impacts (Exception #4)

~~— Moultrie PO witness Reinecke presented routing factors for the Route MZK-2 and the PDM/CFT Route for what he described as minimally disturbed areas in Moultrie PO Ex. 4.2 (RH) at 1 of 1. Moultrie PO notes that minimally disturbed areas were defined as an area within the 500-foot analysis corridor that has the least disturbed land (i.e., deciduous forest, developed open space, emergent herbaceous wetlands, grassland/herbaceous, open water, pasture/hay, and woody wetlands land uses) use that may contain undisturbed natural features. Moultrie PO notes that Route MZK-2 has 40 (11.0%) fewer acres of minimally disturbed areas in the 500-foot study corridor area than the PDM/CFT Route.~~

Moultrie PO believes that with regard to this factor, PDM/CFT basically engaged in a simplistic analysis which assumed that merely because the Stipulated Route/Route MZK-2 is longer, it has more environmental impacts than the PDM/CFT route. Moultrie PO opines that this is a false assumption and that both ATXI and Moultrie PO presented expert witnesses who actually performed routing analyses, contrary to PDM/CFT's

witnesses, which include no expert testimony. Moultrie PO notes that its witness Reinecke presented a routing factor analysis, consistent with the analyses performed by ATXI for the entire IRP, which actually attempts to identify and measure the specific environmental factors associated with each route, rather than simply assuming that a shorter route means fewer impacts. Moultrie PO observes that this analysis shows that, despite being longer, the Stipulated Route/Route MZK-2 actually results in less adverse environmental impact than the PDM/CFT route. This occurs for a number of reasons. First, the Moultrie PO route parallels existing transmission lines for about 14.7 miles compared to 1.0 mile for the PDM/CFT route, or 13.7 more miles than the PDM/CFT route. Thus, Moultrie PO maintains that this paralleling occurs for all of the additional length associated with the Stipulated Route/Route MZK-2 versus the PDM/CFT route (8.3 miles). Furthermore, Moultrie PO observes that, even after netting off the additional 8.3 miles of length of the Stipulated Route/Route MZK-2 versus the PDM/CFT route, 5.4 more miles of the Stipulated Route/Route MZK-2 parallels existing transmission lines than the PDM/CFT route. Moultrie PO notes that its witness Reinecke testified that as a result, the Stipulated Route/Route MZK results in less habitat fragmentation than the PDM/CFT route. Moultrie PO points out, generally the Channon Hybrid Route has 143 to 164 acres (depending on the substation site at Mt. Zion) fragmented woodlands, versus the Stipulated Route/Route MZK alternatives with 44 to 64 acres.

Second, Moultrie PO states that Mr. Reinecke described the concept of minimally disturbed areas in Moultrie PO Ex. 4.2 (RH) at 1 of 1, which were defined as an area within the 500-foot analysis corridor that has the least disturbed land, that is, land that has not already been disturbed in some manner (i.e., deciduous forest, developed open space, emergent herbaceous wetlands, grassland/herbaceous, open water, pasture/hay, and woody wetlands land uses) that may contain undisturbed natural features. Moultrie PO notes that Route MZK-2 has 40 (11.0%) fewer acres of minimally disturbed areas in the 500-foot study corridor area than the PDM/CFT Route.

Third, Moultrie PO observes that the routing analysis also shows that the Stipulated Route/Route MZK has 32 fewer acres of wooded areas within the 500 foot corridor than the PDM/CFT route, and that the PDM/CFT route contains 1.2 acres of protected habitat, a rookery, within the corridor that the Stipulated Route/Route MZK-2 does not.

Moultrie PO also addressed concerns raised by PDM/CFT with regard to the alleged impacts on a Native American archeological site it claims is crossed by the Stipulated Route/Route MZK-2. Moultrie observes that the evidence shows that this site has already been extensively cultivated and remains so, that the presence of the site would not prevent the line from being constructed in any event, and that the Commission has already determined that the presence of the site would not impair construction of the proposed route when similar issues were raised in phase one of these proceedings.

Moultrie PO also observed in its brief on exceptions that the specific environmental impacts identified by PCM/CFT appear to be isolated examples and are not part of a comprehensive routing analysis such as that presented by Moultrie PO in this case.

5. Impacts on Historical Resources (Exception #5)

Moultrie PO has presented routing factors related to historical resources for both Route MZK-2 and the PDM/CFT Route. Moultrie PO states that neither Route MZK-2 nor the PDM/CFT Route impact any National Register Historical Places, Known Historic Structures or Archeological Historic sites. Moultrie PO notes there are three known archeological sites within the 500-foot study corridor for Route MZK-2 and no archeological sites within the 500-foot corridor for the PDM/Channon Route. However, Moultrie PO submits that the Commission previously held that:

Of [the archeological sites] that may exist, none appear to impair the ability to construct any of the three lines. The MZK route does appear to be marginally preferable in that it is roughly two miles further from the historical Amish areas near the proposed routes.

August 20 Order at 98-99

Mr. Reinecke indicates in his direct testimony that only one of the archeological sites within the 500-foot study corridor of Route MZK is actually crossed by the easement for the Route, and Mr. Reinecke ultimately concluded the presence of this site would not prevent Route MZK from being constructed.

With regard to the potential impact on the Amish community and the village of Arthur, Moultrie PO notes, similarly to ATXI, that the impacts to Arthur would not be any worse along the Stipulated Route (MZK-2 Route) than along the PDM/CFT Hybrid Route. Specifically, with regard to proximity to Arthur, Moultrie PO notes that the closest distance between Arthur and the Stipulated Route/Route MZK-2 is approximately four miles. Moultrie PO also notes that PDM/CFT complain about the impact of the Stipulated Route/Route MZK-2 on the “northern gateway” to Arthur. The Stipulated Route/Route MZK-2 crosses the “northern gateway” at a point approximately nine miles from Arthur; and the PDM/CFT Hybrid route is about eight or nine miles south of Arthur on its “southern gateway”. With regard to the impact on the Amish community, however, Moultrie PO notes record evidence that the original ATXI alternate and primary routes through Moultrie County (the ATXI primary route through Moultrie County is part of the PDM/CFT Hybrid Route) would be within one quarter mile of existing Amish cultural facilities and farmsteads. MCPO observes that these Amish communities in Moultrie County isare more immediately affected than the Arthur Amish community which is literally miles from the Stipulated Route/Route MZK-2 at its closest point.

6. Social and Land Use Impacts (Exception #6)

Mr. Reinecke also presented routing factors related to social and land use impacts for Route MZK-2 and the PDM/CFT Route in Moultrie PO Ex. 2.2 RH Rev. at 1 and 2. Of the social and land use factors, Moultrie PO notes that ATXI identified the public as favoring the following as some of the high sensitivity factors in Phase I of ATXI's public meetings:

- Cemeteries
- Churches
- Prime Farmland
- Schools

Moultrie PO states that Route MZK-2 and the PDM/CFT Route have no churches or cemeteries within their 500-foot study corridors, and there is one school site along Route MZK-2 versus three school sites along the PDM/CFT Route. Moultrie PO notes that Route MZK-2 has 80.0 (4.7%) more acres of Prime Farmland, within its 500-foot study corridor, than the PDM/CFT Route.

Moultrie PO believes it should also be noted that Route MZK-2 is in proximity to the Tuscola Airport, however Moultrie PO notes the Commission has already taken this fact into account. In the August 20, 2013 Order, the commission concluded,

Other impacts under this criterion concern two airstrips: the Tuscola Airport along the MZK With regard to the Tuscola Airport, while the Commission does not take lightly the concerns of the airport owner, Moultrie PO's witness on this issue is persuasive. Construction of the MZK Route does not appear to be an impediment to the Tuscola Airport's continuing operation. Overall, the Commission finds that this criterion favors the MZK Route.

August 20 Order at 99

While Route MZK-2 is located 2070 feet south of the Tuscola Airport, Moultrie PO states that the record shows that Route MZK complies with the Illinois Department of Transportation's rules and regulations on airport hazards. (Title 92, Ch. B, Pt. 16, Sec. 16 of the Illinois Administrative Code). Furthermore, Moultrie PO notes that ATXI witnesses have testified that Route MZK is "constructable." Thus, Moultrie PO suggests that the record shows that Route MZK is constructable, can be constructed, and is consistent with Illinois airport hazard requirements, if those requirements are applicable.

With regard to impacts on prime farmland, Moultrie County PO observes that it utilized the Federal definition of "prime farmland", which has been consistently used by ATXI, Moultrie County, and other parties, as well as the Commission, to analyze such impacts with regard to all other line segments throughout the first phase of these

proceedings. Based on this definition, Moultrie County PO states that there is little difference between the routes, with Route MZK-2 affecting only 91 additional acres of prime farmland than Route CFT-2. Moultrie County observes that, on rehearing, PDM/CFT introduced a different definition of "prime farmland". This new definition makes assumptions about farming practices that may or may not actually be implemented on what it defines as "potential Prime Farmland" soils. Moultrie County PO notes that, regardless of the definition of prime farmland utilized, there is not a significant difference in the amount of prime farmland affected by either route.

With regard to PDM/CFT's claim that the Stipulated Route/Route MZK-2 "splits" more farm properties, Moultrie Country PO notes uncontroverted testimony from ATXI and MCPO witnesses that, other than for the footprint of the foundations of the transmission line structures, no agricultural land will be permanently removed from cultivation (or farming operations significantly impaired) because a transmission line traverses farmland. Moultrie PO also observes that, of the proposed primary route easement area of approximately 4,489 agricultural acres, only 1.55 acres of actual farmland will be taken out of production.

7. Number of Affected Landowners/Stakeholders (Exception #7)

To the best of Moultrie PO's knowledge, this information has not been quantified for either Route MZK-2 or the PDM/CFT Route.

8. Proximity to Homes and Other Structures (Exception #8)

~~— Moultrie PO indicates that the evidence shows that within 75 to 150 feet, the PDM/CFT Route has 9 residences, while Route MZK-2 has none; and in total, within 500 feet, Route MZK-2 has 19 (61.3%) fewer residences than the PDM/CFT Route. Within 75 feet of the centerline, it appears to Moultrie PO that Route CHANNON-2 has 6 non-residential structures while Route MZK-2 has none, and in total, within 500 feet, Route MZK-2 specifically has 72 (55.8%) fewer non-residential structures than Route CHANNON-2 specifically.~~

Moultrie PO indicates that, although much has been done to obfuscate the record on this issue, fundamentally the overwhelming weight of the evidence on the record makes absolutely clear the number of residential and non-residential structures that are within a 500 foot corridor for the Stipulated Route/Route MZK-2 and the PDM/CFT route (Route CFT-2 or CHANNON-2). In fact, with the exception of 1 residential structure that PDM/CFT questions, ATXI, Moultrie PO, and PDM/CFT are basically in agreement on the number of structures within the 500-foot corridor for both routes. A 500 foot corridor has been used by ATXI and other parties to analyze these issues for all other line segments and by the Commission as well in phase one of these proceedings. The evidence shows that within 75 to 150 feet, the PDM/CFT Route has 9 residences, while Route MZK-2 has none; and in total, within 500 feet, Route MZK-2 has 12 residences within the 500 foot corridor, while the PDM/CFT route has 31 (or thirty if the one residence PDM/CFT questions along its route is not counted.) Thus the

Stipulated Route/Route MZK has 19 (61.3%) fewer residences than the PDM/CFT Route (or fewer 18 if the one questioned residence is not included). Within 75 feet of the centerline, it appears to Moultrie PO that Route CHANNON-2 (i.e., the PDM/CFT route) has 6 non-residential structures while Route MZK-2 has none, and in total, within 500 feet, Route MZK-2 specifically has 72 (55.8%) fewer non-residential structures than Route CHANNON-2 specifically. PDM/CFT has introduced no evidence to contest this non-residential structure count. Moultrie PO also notes that, while Staff's approach is somewhat different, Staff nonetheless concludes that the Stipulated Route/Route MZK-2 Route comes in close proximity (which Staff does not clearly define) to only three residential structures, while the PDM/CFT route comes in close proximity to 15 residences.

Moultrie PO opines that part of the confusion on this issue results from the fact that, on rehearing, PDM/CFT utilized a wider 530 foot corridor to analyze how many residential and non residential structure were impacted by the Stipulated Route/Route MZK-2, but used the more narrow 500 foot corridor to analyze the structures on its own route. Based on this asymmetric analysis, PDM/CFT then attempts to confuse the issue by claiming ATXI and Moultrie PO somehow "missed" residences along the Stipulated Route/Route MZK-2. Moultrie PO notes that there are no "missed" residences and that in fact the residences to which PDM/CFT refers are located outside of the traditional 500 foot corridor utilized heretofore in these proceedings and which PDM/CFT itself used to determine the residential count along its own route.

Moultrie PO also notes that it based its routing analysis on rehearing on updated data and routing information provided by ATXI, which utilized the 500 foot corridor. In developing this information, Moultrie PO observes that ATXI flew over and visually inspected the Stipulated Route/Route MZK-2. Thus Moultrie PO and ATXI are in total agreement with regard to the residential and on non-residential counts. Moultrie PO also observes that neither it nor ATXI utilized Google photography for its analysis on rehearing. On the other hand, it appears that PDM/CFT did use Google photography and that this photography was apparently dated between April and May of 2012, or almost 2 years old. Moultrie PO also noted that PDM/CFT presented a series of 18 Google photographs in its brief, alleging certain structures within the 530 foot corridor, but that none of the photographs contain a scale, so it is not possible to determine from them the accuracy of the distances that PDM/CFT reports.

Despite attempts to confuse the record, Moultrie PO states that the record is clear that, along the 500 foot corridor, there are 19 additional residential structures along the PDM/CFT route (or 18 excluding the one contested residence on the PDM/CFT route) and 72 additional non residential structures than along the Stipulated Route/Route MZK-2.

9. Proximity to Existing and Planned Development (Exception #9)

Moultrie PO notes that Staff witness Rockrohr has testified in his surrebuttal testimony that Route CHANNON-2 (PDM/CFT Route) passes through an area of planned development; specifically, Route CHANNON-2 passes through a development area along Highway 121, east of Sullivan. To the best of Moultrie PO's knowledge, Route MZK-2 does not pass through any areas of planned development. Moultrie County PO also maintains that PDM/CFT's concerns that the Stipulated/MZK-2 route would have negative visual impacts on existing developments and would limit opportunities for growth in six towns are groundless. Moultrie County PO observes that, to the best of its knowledge, none of these communities (unlike the Village of Mt. Zion) have intervened in these proceedings and that no witness, including PDM/CFT witnesses, have testified to or presented any evidence that would support PDM/CFT unsubstantiated claims. (MCPO Reply Brief pg 40) Moultrie County PO also notes that the Stipulated Route/Route MZK-2 was specifically routed to avoid and minimize impacts to urban areas. In Moultrie PO's view, MZK-2 outperforms the PDM/CFT (CHANNON-2) route on this criterion.

10. Community Acceptance (Exception #10)

Moultrie PO states that Route MZK-2 was a compromise among many parties, who include ATXI, Moultrie PO, Village of Mt. Zion, STPL, and Shelby County. Of the 15 parties who represent property owners along any of the routes proposed from Mt. Zion to Kansas, Moultrie PO suggests that only PDM opposes the stipulated route from Mt. Zion to Kansas. Moultrie PO also notes that the only "community" along the Mt. Zion to Kansas route to intervene in these proceedings is Mt. Zion, which supports the Stipulated Route/Route MZK-2 Route. Moultrie PO also observes that, although PDM claims 500 "intervenors" are part of its group, it is safe to assume that the population of Mt. Zion is substantially in excess of 500 and that "if this is a numbers game", more people potentially impacted by the Mt. Zion to Kansas route support some version of the Stipulated Route/Route MZK, and have expressly indicated that support through the Village of Mt. Zion's intervention and participation in this case. Moultrie PO notes that of all active parties in the case, addressing the Mt. Zion to Kansas routing issue, expressed support for the Stipulated Route/Route MZK, and none have expressed support for the adoption of the PDM/CFT Route. Moultrie PO observes that these parties represent a diverse group of interests over a broad geographic area encompassing several counties.

11. Visual Impact (Exception #11)

Moultrie PO witness Dauphinais discussed the use of the existing linear features to avoid introducing new visual impact where none already exists. Moultrie PO states that Route MZK-2 parallels 13.7 (1,370.0%) more miles of existing transmission lines than the Route CHANNON-2.40. Moultrie PO notes that the Commission, in its Final Order at page 100, concluded that “Running the two lines parallel to one another will minimize the 345 kV line’s visual impact.

Moultrie PO addressed PDM/CFT’s position that the greater length (8.3 Miles), additional towers and alleged close proximity to multiple villages of the Stipulated Route/Route MZK means that the PDM-/CFT route is superior for this routing factor. Moultrie PO notes that witness Dauphinais discussed the use of existing linear features to avoid introducing new visual impacts where none already exist. Moultrie PO states that Route MZK-2 parallels 13.7 (1,370.0%) more miles of existing transmission lines than the PDM/CFT route. This means that all of the additional length of the Stipulated Route/Route MZK-2 compared to the PDM/CFT route is parallel to existing transmission lines. It also means that, even deducting the additional length, the Stipulated Route/Route MZK-2 parallels about 5.4 more miles of existing transmission lines than the PDM/CFT route. Thus, Moultrie PO observes that the PDM/CFT route introduces about 5.4 more miles of visual impacts where similar visual impacts do not already exist, than the Stipulated Route/Route MZK-2. Moultrie PO further notes that the Commission in its Final Order at page 100 concluded that “Running the two lines parallel to one another minimizes the 345 kV’s visual impact.” Moultrie PO also noted that in its Final Order, the Commission also found that visual impacts favored the Stipulated Route/Route MZK-2 because nearly a quarter of its length paralleled existing transmission lines, which minimized the line’s visual impact. Moultrie PO states that the Commission’s findings that visual impacts still favor the Stipulated Route/Route MZK-2 because of its extensive paralleling is still well supported in the record on rehearing.

Moultrie PO also addressed PDM/CFT’s suggestion that Staff witness Rockrohr testified that a shorter route means less visual impacts. Moultrie PO notes that what Mr. Rockrohr actually testified to is that, all else being equal, such might be the case. However, Moultrie PO notes, where one route parallels significantly more miles of significant existing linear features such as existing transmission lines, as does the Stipulated Route/Route MZK, all else is clearly not equal. As to PDM/CFT’s concerns regarding additional towers and spans or proximity to multiple towns associated with the Stipulated Route/Route MZK-2, Moultrie PO notes that there is nothing new with regard to these issues compared to the original proceeding, where the Commission concluded that the installation of new poles and spans parallel to existing transmission lines reduces visual impact. Moultrie PO observes that, on rehearing, it is clear that the Stipulated Route/Route MZK-2 still parallels existing transmission lines for about 5.4 more miles than the PDM/CFT route, even after accounting for the total additional length of the Stipulated Route/Route MZK.

12. Presence of Existing Corridors (Exception #12)

~~Moultrie PO notes that Mr. Dauphinais discusses the importance of considering the paralleling of existing linear features in terms of the length of the route not paralleling such features. By example, he showed that this is important because the routes being compared can potentially have significantly different lengths causing a significantly longer route to potentially have less impact than a shorter route because the longer route also has more total miles of paralleling. Moultrie PO states that he also discussed at length that when evaluating such linear feature paralleling, it is important to work from the most significant type of existing linear feature to the least significant type of existing linear feature, and he also explained that not all existing linear features are the same with regard to their degree of visual impact, noise impact, environmental fragmentation and/or agricultural fragmentation.~~

~~———— Moultrie PO believes that the MZK Route is superior to the PDM/CFT Route with regard to paralleling opportunities since existing transmission lines, major roads and railroads represent existing linear infrastructure with much more significant visual impact, noise impact, environmental fragmentation than minor roads, other utility right-of-way or section lines.~~

~~———— Mr. Dauphinais summarized his analysis of opportunities for route paralleling by noting that Route MZK-2 has 5.3 (6.3%) fewer miles not parallel to existing transmission lines than the PDM/CFT Route, thereby increasing the opportunities to minimize incremental adverse impacts. Moultrie PO suggests that only when section lines are added into the analysis does the PDM/CFT Route have less distance not paralleling existing linear features; however this better performance of paralleling section lines is only be achieved by placing a significant number of additional residences both within 150 feet and within 500 feet of the proposed transmission line on the PDM/CFT Route.~~

Moultrie PO notes that its witness Mr. Dauphinais testified that the primary purpose of paralleling existing linear features is to take advantage of significant existing visual, noise, environmental fragmentation and/or agricultural fragmentation impacts in order to avoid the introduction of new such impacts where they do not already exist. Mr. Dauphinais also testified that, in this regard, not all linear features are the same with regard to their impact on these factors. Mr. Dauphinais noted that a section line may potentially reflect an agricultural boundary but, by itself, does not necessarily have any significant existing visual or noise impact or present existing environmental fragmentation. Therefore, Moultrie PO argues, the use of section lines, without the additional presence of more significant existing linear features, does little to nothing to mitigate the impacts associated with the introduction of a new transmission line. On the other hand, Moultrie PO observes, an existing transmission line of the same size or greater than the proposed line provides a very significant amount of existing impact that helps to mitigate the impact of the new transmission line. Mr. Dauphinais also discusses the importance of considering the paralleling of existing linear features in terms of the length of the route not paralleling such features. By example, he showed that this is important because the routes being compared can potentially have significantly different lengths causing a significantly longer route to potentially have less impact than a shorter route because the longer route also has more total miles of paralleling.

Moultrie PO states that Mr. Dauphinais also discussed at length that when evaluating such linear feature paralleling, it is important to work from the most significant type of existing linear feature to the least significant type of existing linear feature, and he also explained that not all existing linear features are the same with regard to their degree of visual impact, noise impact, environmental fragmentation and/or agricultural fragmentation. Moultrie PO observes that Mr. Dauphinais testified that the greatest weight should be placed on the length of the line that does not parallel existing transmission lines, and that on this basis, the Stipulated Route/Route MZK-2, which has only 55.5 miles that do not parallel existing transmission lines, is superior to the PDM/CFT route (Route CFT-2), which includes 60.8 miles that do not.

Moultrie PO believes that, when the relative significance of the linear features with regard to visual impacts, noise impacts, environmental or agricultural fragmentation is correctly considered, the MZK Route is superior to the PDM/CFT Route with regard to paralleling opportunities since existing transmission lines, major roads and railroads represent existing linear infrastructure with much more significant impacts in these areas than minor roads, other utility right-of-way or section lines.

Mr. Dauphinais summarized his analysis of opportunities for route paralleling by noting that Route MZK-2 has 5.3 (6.3%) fewer miles not parallel to existing transmission lines than the PDM/CFT Route, thereby increasing the opportunities to minimize incremental adverse impacts. Moultrie PO suggests that only when section lines are added into the analysis does the PDM/CFT Route have less distance not paralleling existing linear features. However, as noted above, Moultrie PO maintains that these

section lines add little to nothing in terms of utilizing significant linear features to minimize incremental adverse impact. Moultrie PO argues that the Stipulated Route, Route MZK-2 has better performance than the PDM/CFT route with regard to minimizing the portion of the line that is not parallel to existing transmission lines, and that it also performs better with regard the portion of the line that parallels other more significant linear features such as major roads and railroads. In addition, Moultrie PO notes that any alleged paralleling benefit provided by minor roads, or section lines is only achieved by placing a significant number of additional residences both within 150 feet and within 500 feet of the proposed transmission line on the PDM/CFT Route.

Moultrie PO notes that PDM/CFT again asserts that ATXI raised concerns about paralleling existing transmission lines and that this is somehow inconsistent with ATXI's support of the Stipulated Route/Route MZK-2. This issue has been addressed earlier, but Moultrie PO again reiterates that ATXI witness Hackman specifically testified that the same factors that make paralleling existing transmission lines a concern with regard to the Meredosia to Pawnee segment do not exist with regard to the Mt. Zion to Kansas segment.

Moultrie PO suggests there is a serious question with regard to how PDM/CFT's witness derived the number of bisected farm tracts. Moultrie PO notes that this information utilized only Farm Service Agency information dated from 2008 and an undated aerial photograph. It also notes that the only way to properly know if a line actually bisects a property is by conducting a survey. Moultrie PO observed that its witness, Mr. Reinecke testified that the ownership of farm tracts will not be split because ATXI will only acquire an easement, and that the owners of the tracts will retain ownership as well as the ability to continue farming operations within the easement. Furthermore, Moultrie PO again noted the limited nature of the impacts on farmland placed within the 500 foot analysis corridor, observing that the placement of the transmission line only removes from production the land at, or very close to, the foundations of the associated transmission line structures, which ATXI witnesses indicated would involve for the entire Illinois Rivers Project only about 1.55 acres of actual farmland out of about 4,489 acres of farmland associated with ATXI's Primary Route.

Moultrie PO also addressed PDM/CFT's assertions that the Stipulated Route/Route MZK-2 disregards a claimed public preference of routing along roads, section lines, and property lines. Moultrie PO notes that about 20% of its entire route closely parallels existing minor roads and section lines, which does not even consider the portion of the route that parallels existing transmission lines that in turn may simultaneously closely parallel major road or section lines. Moreover, Moultrie PO observes that both ATXI and Moultrie PO witnesses noted the inherent conflict associated with paralleling existing roadways because that also tends to be where residences are located as well. Moultrie PO believes it and ATXI's routing analysis associated with the Stipulated Route/Route MZK-2 and the PDM/CFT route has appropriately balanced these competing issues.

Moultrie PO also takes issue with PDM/CFT's assertions that its route impacts far fewer landowners. Moultrie PO and ATXI have both observed that there is no record evidence on rehearing regarding the number of landowners along this line segment that would indicate one route is better than the other. The length of a route alone cannot be used as a substitute to make a determination with regard to this factor.

G. Commission Conclusion (Exception #13)

The Commission has reviewed each party's position for this segment of the project, and believes each has attempted to summarize the evidence as it has been presented. ~~The Commission will again express its dismay regarding the apparent confusion regarding the number of homes and other buildings impacted by each proposed route. The Commission notes that this proceeding has been going on for over a year, and it seems that it is still not settled on where a home is in relation to a proposed route, and whether it will be impacted or not. The apparent reliance on Google Earth™ to determine such issues, while less expensive, seems a questionable practice to the Commission. With that being said, †The Commission will attempt to analyze the criteria it has previously considered in determining the most appropriate choice.~~

As to the "Length of the Line," or the "Difficulty and Cost of Construction," it appears uncontroverted that the PDM/CFT and Staff Routes are preferable to the Moultrie PO Route. As to the "Length of the Line," there is no dispute that the Moultrie PO route (Stipulated Route/Route MZK-2) is approximately 8.3 miles longer than the PDM/CFT route. The Commission notes, however, that while this is a routing factor to consider, it does not follow that simple line length is the only or determinative factor that can or should be considered in determining which route is preferable.

With regard to the "Difficulty and Cost of Construction," it appears uncontroverted that the Stipulated Route/Route MZK-2 exceeds the cost of the PDM/CFT route by approximately \$15.2 million (12.7%). However, Illinois customers will pay only 9% of the IRP due to the MISO multi-value project cost sharing, therefore Illinois ratepayers will only pay \$1.36 million more in costs for the additional costs for construction of the Stipulated Route/Route MZK-2 over the PDM/CFT route. Contrary to PDM/CFT's assertions it appears that the costs of acquiring additional easements associated with the longer Stipulated Route/Route MZK are already included in the baseline cost estimates of ATXI and do not represent additional costs associated with the Stipulated Route/Route MZK-2. Although the cost of the Stipulated Route/Route MZK-2 to Illinois ratepayers will be approximately \$1.36 more than for the PDM/CFT route, and, therefore constitutes a slight advantage to the PDM/CFT route on this aspect of this criterion, it does not appear this difference is significant in light of the other advantages of the Stipulated Route/Route MZK-2, particularly with regard to the substantially reduced impact of that route on residential and non-residential structures. With regard to the part of this factor relating to the difficulty of construction, the Commission concludes that the evidence fails to demonstrate that the Stipulated Route/Route MZK-2

will be any more difficult to construct than the PDM/CFT route. As to the "Difficulty and Cost of Operation and Maintenance," it appears there is no material difference between the routes in question.

In regards to the issue of "Visual Impact," the Commission notes that each route will consist of the same type of construction, across mostly the same type of property. The route supported by Moultrie PO, ATXI, the LBJ Partnership and the Corley's is longer by 8.3 miles; however that Route a portion of that extra length will parallel an existing transmission line for 14.7 miles, thereby mitigating some of the visual impact from the extra length and providing an additional 5.3 miles of visual impact mitigation. The Commission believes there is little difference between the routes in considering this criterion slightly favors the Stipulated Route/Route MZK.

When considering the criterion of "Community Acceptance," the Commission accepts that there is no clear and finite definition of what constitutes "community acceptance", and that a number of factors could be considered in analyzing this factor. PDM/CFT claims that its intervenor group contains 500 intervenors from Piatt and Douglas Counties who support its position. However, while a relevant consideration, the Commission declines to reduce this factor to a "numbers game". The Commission is certainly not bound by such stipulations. However, the quality and nature of the interests represented, as well as, the demonstrated willingness and ability of parties with clear interests to negotiate their differences and reach reasonable compromises and accommodations of those interests are also important factors. As ATXI noted, while the PDM intervenor group may contain 500 names, there is no record evidence clearly defining the interests of those intervenors and whether or how they are actually impacted by the Stipulated Route or any other route. On the other hand the Stipulated Route/Route MZK-2 represents an accommodation, and a balancing of interests, among numerous parties representing a host of divergent interests, including the utility responsible for the overall project, the Village of Mt. Zion, Moultrie PO, Shelby County Landowners Group, as well as the Commission Staff. No active party to these proceedings, other than PDM/CFT, opposed the Stipulated Route/Route MZK-2. The Commission is of the opinion that, on balance, the evidence favors the Stipulated Route/Route MZK-2 with regard to this factor. it is unclear exactly what should be considered, and how it should be determined which route has more "Community Acceptance." Moultrie PO and ATXI note that they have come to an agreement on a route, and it is supported by certain other intervenors. PDM/CFT however, points to the number of landowners that have joined its petition in this proceeding. In considering the evidence presented in this proceeding, the Commission believes there is no clear preference between the routes presented.

The Commission will next turn its attention to "Environment Impacts," one of the more contested areas for this segment of the project. ATXI and Moultrie PO have submitted unrefuted testimony from route analysts that, despite being longer, the Stipulated Route/Route MZK-2 results in less habitat fragmentation because it parallels more miles of existing transmission lines where such fragmentation has, to some extent, already occurred, than the PDM/CFT route; that the longer Stipulated Route/Route

MZK-2 nonetheless has fewer acres of minimally disturbed land than the PDM/CFT route; and that the longer Stipulated Route/Route MZK-2 affects fewer acres of woodland than the PDM/CFT route, which route also contains a protected habitat (a rookery) which the Stipulated Route/Route MZK-2 does not. In light of this uncontroverted evidence, PDM/CFT's assumption that the Stipulated Route/Route MZK-2 has greater environmental impacts than the PDM/CFT route simply because it is longer cannot be sustained. ATXI and Moultrie PO claim that the route they support has fewer wooded acres involved, as well as paralleling in part an existing transmission line. PDM/CFT also argues that as the route it supports is shorter, the environmental impact should be lessened, and suggest that the area where the Moultrie PO Route will be located threatens a forested flood plain, as well as a grove of hybrid black walnut trees. As to the walnut trees The Commission agrees with Moultrie PO that this issue appears more appropriately related to economic impacts on agricultural operations, rather than environmental issues. The Commission also notes that it is unclear from the record how construction of a transmission line of the type and design at issue in these proceedings would have a material impact on a wooded flood plain. On balance, the Commission believes that the weight of the evidence in these proceedings favors the Stipulated Route/Route MZK-2 with regard to this routing factor. ~~believes based on the evidence presented, that neither route is clearly preferable to the other when considering "Environmental Impacts."~~

When considering "Impacts on Historical Resources," the Commission notes that it previously found that no impacts would impair the ability to construct the Stipulated Route supported by Moultrie PO and ATXI, or ATXI's Primary or Alternate Routes. PDM/CFT suggests on rehearing that the Moultrie PO Route (Stipulated Route/Route MZK-2) will come too close to the "Amish community" in Arthur and will impact tourist trips to the area. The record, however, shows ATXI however believes that both the Stipulated Route/Route MZK-2 and the PDM/CFT Rroutes are approximately the same distance from Arthur. Therefore, and the impacts, if any, will depend on which direction a person takes in traveling to Arthur to determine which route is preferable in regards to Arthur. With regard to the potential impact on the Amish community, however, uncontested record evidence shows that the PDM/CFT Hybrid Route, which largely incorporates the original ATXI primary routes through Moultrie County, would come within one quarter mile of existing Amish cultural facilities and farmsteads. Although there is also a suggestion of historical artifact sites in the Moultrie PO Route path, the Commission accepts ATXI's assertion that it can span any sites and will obtain any required permits or approval before construction. In the first phase of these proceedings, the Commission found that this routing factor marginally favored the Moultrie PO Route. No evidence has been introduced on rehearing that would support changing this conclusion, and the fact that the PDM/CFT Hybrid Route would come within one quarter mile of existing Amish cultural facilities and farmsteads in Moultrie strengthens it. The Commission will again express its frustration that after months of testimony and investigation, there is dispute between the parties as to which route is closer to a town such as Arthur. This seems a basic fact that should not be subject to interpretation. After considering the evidence presented, the Commission is unable to

~~determine any clear preference between the routes based on the criterion of "Impacts on Historical Resources."~~

In considering the criterion of "Social and Land Use Impact," the Commission notes that it found that this criterion favored the Moultrie PO Route as it affected the least amount of farmland, and it would not affect the Tuscola Airport. PDM/CFT now argues that the evidence on rehearing has shown that this criterion now favors the PDM/CFT Route. Moultrie PO contends however, that its evidence shows that the Moultrie PO Route will not conflict with the Tuscola Airport, despite the testimony from the PDM/CFT witness. The Commission notes that this witness apparently uses the airport in question, and is not an official associated with the airport. It appears from the evidence that the route which Moultrie PO has presented the Commission with, will impact more farmland, being longer; and also appears to split more farms, rather than traveling along roads or section lines. However, the uncontroverted evidence shows that the additional acres of prime farmland affected by the Moultrie PO Route, regardless of the definition of "prime farmland" used, is insignificant, especially in relation to the entire affected acreage of the project. This evidence also shows that the "splitting" of farmland in this case does not result in taking any significant farmland out of production or materially impairing farming operations. The Commission believes that, the evidence presented does not show a significant advantage of one route over the other, particularly where the slightly greater number of affected prime farmland acres and the "splitting" of farmland effects of the Moultrie County PO route also results in fewer impacts on residential structures. Furthermore, impacts on farm land are mitigated by the ATXI design and construction methods for the transmission line itself. shows that there is a preference for the PDM/CFT and Staff Routes when considering this issue.

With regard to ~~When considering~~ the criteria of "Number of Affected Landowners and Stakeholders," there is no record evidence on rehearing regarding the number of landowners and stakeholders along this segment indicating that one route is superior to the other.

Concerning ~~"Proximity to Homes and Other Structures," and "Proximity to Existing and Planned Development,"~~ the Commission notes that a great deal of time was spent by the parties at hearing attempting to determine how many houses and where buildings were in relation to the proposed routes. Staff suggests that the PDM/CFT and Staff Routes would be closer to more residences, which is noted in ATXI's table on this issue. The Commission also notes that PDM/CFT believes the evidence presented is questionable, and that various structures were missed along the Moultrie PO Route. PDM/CFT also contends that the greater length of the Moultrie PO Route means it will necessarily affect more landowners.

TABLE 1

Route Alternative	Residential Structures				
	Cumulative Quantity by Band				
	0-75	0-150	0-300	0-500	Total
MZK-2 - MCPO MZK from Staff Option #2	0	0	5	12	12
CFT-2 - Channon Family Trust from Staff Option #2	0	9	21	31	31

Source: MCPO Ex 2.2 (RH) Revised at page 4 of 4

The Commission concludes that the record is clear as to how many residential and non residential structures are located within the 500 foot corridor with regard the Stipulated Route/Route MZK-2 and the PDM/CFT. The following table best reflects the great weight of the evidence with regard to these relationships and strongly favors the Stipulated Route/Route MZK-2 with regard to this routing factor. Even if the one residence PDM/CFT questions on its route is not counted, it does not materially impact this conclusion. The ATXI and Moultrie PO analysis is based on information updated on rehearing consisting of visual inspections and flyovers, while the PDM/CFT analysis appears based in large part on dated Google photography which appears to lack any scale. The ATXI and Moultrie PO analysis is also based on the 500 foot corridor which has been utilized consistently to analyze all other route segments heretofore. PDM/CFT's use of a 530 foot corridor to analyze structures along the Stipulated Route/Route MZK-2 but a 500 foot corridor to analyze structures along its own route is inconsistent and inappropriate. On this routing factor, the Commission finds, consistent with its Order in phase 1 of these proceedings that the evidence strongly favors the Stipulated Route/Route MZK.

With regard to the Proximity to Planned Development, PDM/CFT also lists several apparently small towns to which the Moultrie PO Route comes in proximity. Without evidence of specific developments planned in those various smaller communities, the Commission is hesitant to give that argument much weight. Regardless of which route is approved, the Commission notes that the evidence does not appear to reflect that any residences will need to be removed. The Commission is unable to find, based on the evidence presented, that either route is preferable when considering these criteria.

The Commission agrees with Moultrie PO that the primary purpose of paralleling corridors with existing linear features is to take advantage of existing visual, noise, environmental fragmentation and/or agricultural fragmentation impacts in order to avoid introducing new such impacts where they do not already exist. The Commission also agrees that not all linear features have equally significant existing impacts and that an appropriate way to analyze this factor is to focus on minimizing the length of the new

~~transmission line route that that does not parallel significant existing linear features. The Commission further agrees that the paralleling of existing transmission lines of similar or greater size are far more significant in avoiding the introduction of new adverse visual, noise, and environmental impacts where it does not already exist than does the paralleling of section lines. The Commission believes that when the relative significance of the linear features with regard to visual and noise impacts, as well as environmental fragmentation, the Stipulated Route/Route MZK-2, which includes 14.7 miles that parallel existing transmission lines, is superior to the PDM/CFT route which includes 1.0 mile that parallels such lines. The greater degree of paralleling significantly exceeds the additional 8.3 miles length of the Stipulated Route/Route MZK-2 versus the PDM/CFT route. To the extent section lines should be considered in this analysis, the mitigation benefit of paralleling existing transmission lines is clearly much more significant than the mitigation benefit of paralleling section lines. Moreover, any such great section line paralleling by the PDM/CFT route comes at the cost of significantly greater residential and non-residential structure impacts. The Commission also notes that there is no record evidence on rehearing that would support PDM/CFT's claim regarding the number of property owners along the routes. For these reasons, the Commission believes that the Stipulated Route/Route MZK-2 is superior to the PDM/CFT route with regard to this criterion. The last criterion to consider is the "Presence of Existing Corridors." All parties agree that the Moultrie PO Route parallels US Highway 36 and existing transmission lines for a portion of its length. The Commission notes that PDM/CFT argues that this runs counter to ATXI's arguments on the Meredosia-Pawnee segment, where ATXI argued that paralleling raised possible costs of construction, raised the risk of dual outage, and in some cases made maintenance more difficult. In contrast, PDM/CFT suggests that its route follows more natural corridors, such as roads and section lines, while impacting far fewer landowners. The Commission finds that it must agree with PDM/CFT that its route is preferable to the Moultrie PO Route when considering this criterion. The PDM/CFT route follows more corridors such as property lines, section lines, and roads, while avoiding the dangers of parallel lines that ATXI has previously argued is an adverse attribute. The Commission also notes that the PDM/CFT Route apparently affects fewer landowners and is shorter.~~

Based on the evidence presented to the Commission on this segment of the project, the Commission believes that the preferable route is the Stipulated Route/Route MZK-2~~PDM/CFT Route with Staff's modification~~. It is clearly the least-cost option which has been presented to the Commission, it presents no difficulties in construction or maintenance, and affects fewer property owners than the other options presented. It also appears to better utilize existing corridors such as roads, section lines, and property lines.