

**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	}	Case No.: 12-0598
Act, to Construct, 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.	}	

MOTION FOR STAY

NOW COMES the Morgan, Sangamon, and Scott Counties Land Preservation Group (hereinafter referred to as "MSSCLPG"), by and through its attorneys, Edward D. McNamara, Jr. and Joseph H. O'Brien of McNamara & Evans, and hereby moves that the Illinois Commerce Commission immediately stay the Second Order on Rehearing entered herein on February 20, 2014 (hereinafter referred to as "Order") and in support thereof states as follows:

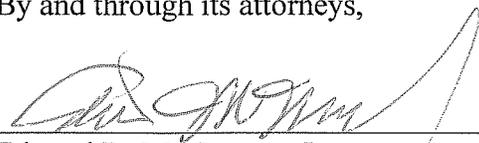
1. That the undersigned intervenor (MSSCLPG) has participated in these proceedings both at hearing and on rehearing and is filing a Notice of Appeal and Notice of Filing of Appeal with the Commission and with the Fourth Appellate District Court of Illinois respectively.
2. MSSCLPG consists of property owners and tenants who will be affected by that portion of the Order relating to the segment of the project between Meredosia and Pawnee, Illinois.
3. That MSSCLPG has been informed and believes, and represents on information and belief, that ATXI will attempt to proceed and negotiate to acquire certain interests in real property for the construction of the power line contemplated by the Order in the foreseeable future,

and prior to the resolution of any appeal. Please see representative letter from ATXI (redacted) dated March 5, 2014 attached hereto as Exhibit A.

4. That MSSCLPG has reviewed certain records of the Appellate Court for the Fourth Appellate District of Illinois indicating that at least two other intervenors to this proceeding have already filed Notices of Appeal. MSSCLPG is further advised that additional petitioners-appellants will be filing Notices of Appeal with reference to the Order.
5. MSSCLPG would respectfully request that this Commission declare the Order be stayed and of no effect until such time as any/all appeals have been fully litigated and that an order staying the effectiveness of the Order will conserve the energies of all parties. MSSCLG further respectfully submits that such an order of stay will save the time and money of the litigants and this Commission. No party will suffer prejudice by the grant of an order staying the effectiveness of the Order.

WHEREFORE, MSSCLPG moves that this Commission enter an order staying the effectiveness of the Second Order on Rehearing entered herein on February 20, 2014 and for such further relief as may be deemed necessary under the circumstances.

Respectfully Submitted,
Morgan, Sangamon, and Scott Counties
Land Preservation Group,
By and through its attorneys,



Edward D. McNamara, Jr.
Joseph H. O'Brien

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VERIFICATION

STATE OF ILLINOIS }
 }SS
COUNTY OF SANGAMON }

Edward D. McNamara, Jr., being first duly sworn, deposes and says that he is authorized to execute this Motion for Stay; that he has read the above and foregoing document, has knowledge of the facts stated therein; and herewith states that the matters set forth therein are true in substance and in fact.

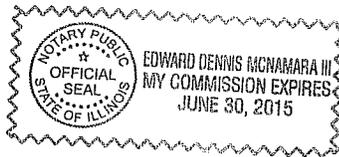


Edward D. McNamara, Jr.

Subscribed and Sworn to before me
this 19th day of March, 2014.



Notary Public



CERTIFICATE OF SERVICE

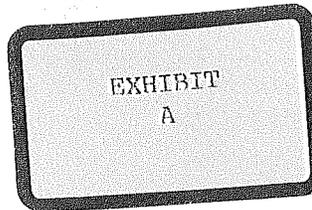
Edward D. McNamara, Jr., an attorney, hereby certifies that he served copies of the foregoing Motion for Stay on the individuals shown on the attached Service List, via electronic mail, on March 19, 2014.



Edward D. McNamara, Jr.

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Ameren Services

March 5, 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: ILLINOIS RIVERS PROJECT

Dear Property Owner:

Ameren Transmission Company of Illinois ("ATXI") has received authorization from the Illinois Commerce Commission to construct a new 345,000 volt electric transmission line through portions of Illinois. The Commission issued a Certificate of Public Convenience and Necessity in Docket No. 12-0598 in orders dated August 20, 2013 and February 20, 2014 that approve a route for the transmission line. The Certificate and the Orders authorizing ATXI to construct the transmission line were granted under Sections 8-406.1 and 8-503 of the Public Utilities Act. This transmission line, which is known as the Illinois Rivers Project, will affect property you own.

The Illinois Rivers Project is part of a group of Multi-Value Projects that were approved by the regional electric transmission organization known as the Midcontinent Independent System Operator (MISO) of which ATXI is a member. Multi Value Projects have been identified as providing a number of material benefits to the regional and Illinois electric transmission system. Specifically, the Illinois Rivers Project will facilitate the delivery of renewable energy from wind generation in Illinois and throughout the Midwest. This project will also strengthen the transmission system and improve electric service reliability to homes and businesses in the central Illinois region. Another major benefit of the project will be relief from load congestion, making the system more efficient and thereby reducing costs.

The transmission line will be constructed using single-shaft steel poles and will be built to meet all regulatory and safety requirements. The poles will be placed on concrete foundations, and their height will range from 80 to 140 feet with the typical distance between the poles being approximately 700 feet.

ATXI seeks to negotiate the purchase of an easement or other land rights for the new transmission line across land that you own in Morgan County, Illinois. A Contract Land Staff representative, working as a contractor on ATXI's behalf, will contact you sometime after March 19, 2014 to schedule a meeting to discuss the project in detail and to negotiate a fair and reasonable agreement with you for the easement rights ATXI is seeking. If you would like to contact Contract Land Staff sooner to arrange a mutually agreeable time for an appointment, please call Amanda Sloan at (877) 686-6205 or write to them at 3200 Pleasant Run, Suite C, Springfield, IL 62711.

Enclosed is a "Statement of Information from the Illinois Commerce Commission Concerning Acquisition of Rights of Way by Illinois Utilities" and a project overview map for your information. For more information about the Illinois Rivers project, or for a list of contractors that might be contacting you regarding the easement on your property, please see the Project Website at www.ilriverstransmission.com.

We look forward to meeting with you to discuss the project in detail.
Sincerely,

Rick Trelz, Manager, Real Estate
Ameren Transmission Company of Illinois

Enclosures: Illinois Rivers Project map

Statement of Information from the Illinois Commerce Commission

ATXI 9001

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PO Box 66149

St. Louis, MO 63166-6149

Ameren.com