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, Operate and Maintain a New High Voltage Electric Service Line and Related Facilities in the Counties of Adams, Brown, Cass, Champaign, Macon, Clark, Coles, Edgar, Fulton, Macon, Montgomery, Morgan, Moultrie, Pike, Sangamon, Schuyler, Scott and Shelby, Illinois.	)	Docket No. 12-0598

APPLICATION FOR REHEARING OF THE MACON COUNTY PROPERTY OWNERS

The Macon County Property Owners ("Intervenors"), pursuant to Section 10-113 of the Illinois Public Utilities Act (220 ILCS 5/10-113) and Title 83, Section 200.880 of the Illinois Administrative Code (83 Ill. Adm. Code 200.880), submit this Application for Rehearing of the Commission's February 20, 2014, Second Order on Rehearing in this matter. The Second Order on Rehearing constitutes an "order on the merits" within the meaning of 83 Ill. Adm. Code. 200.880(a), and this Application is filed within 30 days of service of the Second Order on Rehearing, as required by Section 200.880(a). As provided in Section 200.880(d), Intervenors respectfully request a ruling on this Application within 20 days.

I. ISSUES FOR WHICH REHEARING SOUGHT

Intervenors seek rehearing on the choice of Option #2 over Option #1 for the Mt. Zion susbstation. Intervenors also request the Commission to reconsider the ALJ's decision not to admit into evidence certain photographs propounded by Intervenor Paula Cooley on rehearing.

III. ARGUMENT IN SUPPORT OF REHEARING

The Illinois Rivers Project approval process has been ongoing for almost two years in the public forum and for seven plus in the private arena. Because of its immense span of terrain stretching from Missouri to Indiana, it has taken many twists and turns along the way. The most recent PO addressed the final decisions which were subject to rehearing. One of these was to choose substation Option #2. Intervenors respectfully request that the Commission reconsider this decision in light of the fact that their choice of the PDM/Channon route necessitates a comparison of

substation Option #1 and Option #2. Option #1 was not given sufficient consideration in the decision. The following comparison uses the Commission's twelve point agenda to demonstrate why Option #1 is preferable to Option #2.

a) Length of Line: Option #1 will result in three-quarters to a mile less of 345 kV line as compared to Option #2, and will result in about 5 miles less of 345 kV line as compared to ATXI's Sulphur Springs Road site. [PO, Sec. VII. D.; Staff Identification of Alternate Route from Kincaid to Mt. Zion, Ex. A., p. 15].

b) Difficulty and Cost of Construction: A mile less 345kV line will result in savings. Using the previously submitted estimate of $2,000,000 per mile, that Option #1 results in a savings of up to $2,000,000. Option #1 also presents a less difficult construction as it does not involve crossing any roads, while Option #2 involves crossing Macon County HIghway #32 (Andrews Road) not once, but twice within 1/4 mile of each other. The criss crossing of 138kV lines (see (c) below) would also necessarily add to the difficulty of construction.

c) Difficulty and Cost of Operation and Maintenance: Shorter length translates into reduced operation and maintenance costs. Extra mileage=more structures and wire=increased maintenance. Rick Trelz testified that the 345kV line averages 5.4 to 5.5 support structures per mile (Tr. of 5/14, p. 406, 1.17).

Furthermore, it would appear that diverting the line north to get to Option #2 would require twice crossing a set of 138kV lines which are located on the north side of the county highway running east-west. ATXI argued in its brief in the underlying proceeding that additional operational and maintenance concerns are presented where the proposed transmission line crosses an existing transmission line. See ATXI Initial Brief, p. 62-63, where ATXI argued that such a crossing "increases the reliability risks associated with one or more of the following: common structure, shield wire failure affecting lower conductors, conductor or insulator failure resulting in conductor vertical displacement and external common-mode failure event". Intervenors cannot help but think that the two crossings being 1/4 mile apart would potentially magnify any adverse situation.

d) Environmental Impacts: ATXI witness Murphy testified with respect to another segment of the transmission project that the competing routes (and in this brief, substations and their attached routes) had no unique environmental considerations, but that the shorter route "would result in incrementally less ground disturbance" (ATXI Ex. 3.0, p. 7, Table 1). Mr. Rockrohr testified that he agreed that statement would be true for comparing any two routes (Tr. p. 343, 1.10-12). Therefore, ATXI and staff agree that when all other environmental factors are equal, a shorter route will have less environmental impact than a longer route.

In her testimony, Ms. Cooley objected to Option #2 location due to potential adverse effects on her land and other land in the Mt. Zion 1 drainage district, which is located downstream from the Option #2 site. Ms. Cooley and Intervenors maintain this position.

The photographs which Ms. Cooley propounded support this position, which is why she also requests reconsideration of their admission on rehearing.

e) Impacts on Historical Resources: There do not appear to be any significant differences regarding this factor.

f) Social and Land Use Impacts: Using Option #2 results in more structures, which creates more impact on land use, particularly farming operations.

g) Number of Affected Landowners and Other Stakeholders: Option #2 would result in at least one additional landowner being affected (the owner of the land for Option #2) and numerous other stakeholders potentially affected by any adverse effect on the already overly burdened Mt. Zion Drainage District #1. The record indicates no specific intervenor concerns with Option #1 as compared to Option #2.

h) Proximity to Homes and Other Structures: Option #1 is further from the VOR and for this reason provides a slight preference over Option #2 should applicable FAA provisions be later found to conflict with Staff Option #2 and ATXI and the Commission be unable to remedy the situation. Also, should future additional lines to the substation be added, Option #1 would hold a logistical preference over Option #2 for configuring those lines and maintaining distance from the VOR. Finally, lines to Option #2 will pass very close to a residence. Attached is a map which shows the residence. Because this residence is not clear in maps that were previously submitted (also attached), it has apparently not even been considered in this decision.

i) Proximity to Existing and Planned Development: There do not appear to be any significant differences regarding this factor.

j) Community Acceptance: Ultimately, Staff preferred the Moweaqua site, ATXI preferred the original Sulphur Spings site, PDM/CFT preferred Option #1, and the Village of Mt. Zion stipulated to Option #2 over Sulphur Springs. Given the route selection in the PO of PDM/CFT and the choice between Option #1 or Option#2, Staff preferred Option #1 and ATXI is apparently indifferent despite stipulating to Option #2 as part of a compromise with the Village of Mt. Zion. In the stipulation, ATXI forfeited Sulphur Springs in order to keep the MCPO route. The Village of Mt. Zion forfeited the PDM/CFT route (which is approximately 3 miles further away from the village) in order to move the substation away from Sulphur Springs. In the Village testimony of Julie Miller, they are completely neutral between Option #1 and #2. [Rebuttal Testimony of Julie Miller, Village of Mt. Zion, PDM-MZ Exhibit 4.0, filed December 2, 2013]. As well, in Maureen Borkowski's testimony for ATXI, ATXI is completely neutral between Option #1 and Option #2. [ATXI Exhibit 10.0 (RH), filed December 10, 2013, p. 8, lines 173-174, p. 9. lines 175-178].

Accordingly, the common denominator of the stipulations was the MCPO route. The remaining parties either prefer Option #1 or are indifferent. Since the MCPO route was not chosen, then Option #1 should be favored over Option #2.

k) Visual Impact: As referenced above in (b), using Option #2 site would have 345kV lines traversing a county highway twice and only 1/4 mile apart. Using Option #1 site would have no 345Kv crossing the county highway. Of note is that from Andrews Road north along Henry Road is completely devoid of any electrical lines, as is the staff route coming into either Option #1 or Option #2. Choosing Option #2 would have a negative visual impact more than would Option #1.

l) Presence of Existing Corridors: There do not appear to be any significant differences regarding this factor.

IV. CONCLUSION

In light of a home being located so close to the power lines when using Option #2 and the fact using Option #1 would bring the lines in approximately 1/4 mile southeast of this house, this factor alone is of paramount significance; if to no one else but the family living in the home. This issue, and the above analysis, favors Option #1 in 9 of the 12 of the Commission's own decision-making points and are neutral in the other 3. With all due respect to the Commission, Option #2 has no redeeming qualities and does have 9 shortcomings, the 2 most offensive being (1) proximity to a residence which was heretofore not discussed (because it did not appear in the photos) and (2) lack of least cost concern. Due to the above factors, the Macon County Property Owners respectfully suggest that Option #1 is a better choice than Option #2 for the Mt. Zion substation and request that the Commission choose Option #.

DATED this 21st day of March, 2014

By: /s Christopher M. Ellis

Christopher M. Ellis
Jon D. Robinson
Timothy J. Tighe, Jr.
Bolen, Robinson & Ellis, LLP
202 South Franklin Street, 2nd Floor
Decatur, Illinois 62523
Phone: (217) 429-4296
Fax: (217) 329-0034
Email: cellis@brelaw.com
jrobinson@brelaw.com
ttighe@brelaw.com

PROOF OF SERVICE

I, Christopher M. Ellis, being an attorney admitted to practice in the State of Illinois, and one of the attorneys for Macon County Property Owners, herewith certify that I did on the 20th day of March, 2014, electronically file with the Illinois Commerce Commission, Intervenors' Brief on Exceptions, and electronically served same upon the persons identified on the Commission's official service list.

/s Christopher M. Ellis
Christopher M. Ellis
Bolen, Robinson & Ellis, LLP
202 South Franklin Street, 2nd Floor
Decatur, Illinois 62523
Phone: (217) 429-4296
Fax: (217) 329-0034
Email: cellis@brelaw.com

VERIFICATION

I, Paula Cooley, Intervenor and one of the Macon County Property Owners, being first duly sworn, states that she has read the forgoing Application of Rehearing on the Macon County Property Owners, that she is familiar with the statements made therein, and that he statements made therein are true and correct to the best of her knowledge.

Paula Cooley
Paula Cooley

STATE OF ILLINOIS)
) SS
COUNTY OF MACON)

SUBSCRIBED and SWORN to before me this 20th day of March, 2014.

"OFFICIAL SEAL"
DONNA J. WHITSETT
NOTARY PUBLIC, STATE OF ILLINOIS
MY COMMISSION EXPIRES 07-21-2017

Donna J. Whitsett
Notary Public