

**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,)	Docket No. 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.)	

**PETITION TO INTERVENE OF
LOCKHART LIVING TRUST DATED AUGUST 26, 1996,
CHERYL GIVEN AND RHONDA BROCKETT**

Now come Lockhart Living Trust Dated August 26, 1996, Cheryl Given and Rhonda Brockett (hereinafter, “Lockhart”, “Given” and “Brockett”), by their attorneys, The Law Offices of Elizabeth D. Sharp, P.C. and Rowland & Moore LLP, and pursuant to 83 Ill. Admin. Code 200.200, for their Petition to Intervene in this proceeding, state as follows:

1. Lockhart, Given and Brockett are the owners of are the owners of an 121 acre parcel of an historic family farm located in Christian County, Illinois (the “Property”) that is directly and significantly negatively affected by the Commission’s Second Order on Rehearing concerning Ameren Transmission Company of Illinois (hereinafter “ATXI”) Alternate Route 2 of the Pawnee-Pana segment of a new High voltage transmission line as part of the Illinois Rivers Project.

2. Lockhart, Given and Brockett simultaneously with this Petition for Leave to Intervene are filing an Application for Rehearing on the Second Rehearing Order entered

in this docket. In support of their Application for Rehearing are the affidavits of Lockhart, Given and Brockett, which are incorporated by reference herein in support of this Petition for Leave to Intervene.

3. Significantly, at no time did Lockhart, Given or Brockett or any Property owner receive any notice of this proceeding or any prior notice of any of the proposed routes through the Pawnee-Pana segment until after the Commissions' Second Rehearing Order. (See, Lockhart Aff. ¶18-28, Given Aff. ¶¶ 7-12; and Brockett Aff. ¶¶ 7-13). As detailed in their affidavits, the first they learned of the Alternate Route 2 was when Given received a certified letter on March 8, 2014 from ATXI advising her that the Commission had approved ATXI's Alternate Route 2. (See Given Aff, ¶ 7 and Given Aff. Ex. 3; Lockhart Aff. ¶26; Brockett Aff. ¶ 9).

4. As detailed in the affidavits of Mr. Lockhart, Ms. Given and Mrs. Brockett, and as argued and set forth in their Application for Rehearing, Lockhart, Given and Brockett were not given proper or adequate notice of this proceeding. The Property owners were precluded from taking any role or introducing any evidence in the portion of this proceeding addressing the routes proposed by ATXI for the Pawnee-Pana Segment of the Illinois Rivers Project, including the Alternate Route 2 and the modification for Alternate Route 2 that was approved by the Commission in the Second Order on Rehearing.

5. As detailed in the affidavits of Mr. Lockhart, Ms. Given and Mrs. Brockett, and as argued and set forth in their Application for Rehearing, the Pawnee- Pana Segment Alternate Route 2, as modified, has a severely negative impact on the Property:

- The limited access and need to protect the fragile 100 year old drain tile system will add to the difficulty and cost of construction as well as operation and maintenance;
- Construction and operation and maintenance of the transmission towers and line will impact the single, limited access to the farm needed for its operations;
- Construction and operation and maintenance of the transmission towers and line will most likely damage the fragile 100 year old drain tile system, creating an irreparable damage to farming operations;
- The transmission line would impact an historic resource;
- The transmission line would be proximate to planned development;
- The transmission line would have an adverse visual impact, and;
- The transmission line would add to already significant existing easement corridors already burdening the property.

See, Lockhart Aff. ¶¶ 28-49; Given Aff, ¶14; Brockett Aff. ¶13.

6. No other party can adequately protect the interests of Lockhart, Given and Brockett.

7. Lockhart, Given and Brockett agree to accept service by electronic means.

8. Correspondence and other communications in regard to this matter should

be served upon the following parties:

Elizabeth D. Sharp
 The Law Offices of Elizabeth D. Sharp, P.C.
 200 South Wacker Drive, Suite 2300
 Chicago, IL 60606
 Office: (312) 346-1726
 Fax: 312-346-2069
 lsharp@sharp-law.com

Stephen J. Moore
 Thomas H. Rowland
 Kevin D. Rhoda
 Rowland & Moore LLP

200 West Superior Street, Suite 400
Chicago, Illinois 60654
Voice: (312) 803-1000
Fax: (312) 803-0953
steve@telecomreg.com
tom@telecomreg.com
krhoda@telecomreg.com

WHEREFORE, for the foregoing reasons, Lockhart Living Trust dated August 26, 1996, Cheryl Given and Rhonda Brockett request that their Petition to Intervene be granted and that they be accorded full party status in this docket.

Dated: March 24, 2014

Respectfully submitted,
Lockhart Living Trust dated August 26, 1996,
Cheryl Given and Rhonda Brockett

/s/ Elizabeth D. Sharp
By: Elizabeth D. Sharp

Elizabeth D. Sharp
The Law Offices of Elizabeth D. Sharp, P.C.
200 South Wacker Drive, Suite 2300
Chicago, IL 60606
Office: (312) 346-1726
Fax: 312-346-2069
lsharp@sharp-law.com

Stephen J. Moore
Thomas H. Rowland
Kevin D. Rhoda
Rowland & Moore LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654
(312) 803-1000 (voice)
(312) 803-0953 (fax)
steve@telecomreg.com
tom@telecomreg.com
krhoda@telecomreg.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Lockhart Living Trust dated August 26, 1996, Cheryl Given and Rhonda Brockett's Petition to Intervene has been served upon the parties reported by the Clerk of the Commission as being on the service list of this docket, on the 24th day of March 2014 by electronic mail or U.S. Mail postage prepaid from Chicago, IL to parties without an electronic mail address.

/s/ Stephen J. Moore _____
Stephen J. Moore
Rowland & Moore LLP
200 West Superior Street
Suite 400
Chicago, Illinois 60654
(312) 803-1000
steve@telecomreg.com

ATTORNEY FOR Lockhart Living Trust