

**OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION**

ORIGINAL

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Ameren Illinois Company)
d/b/a Ameren Illinois)
Petition for an Order pursuant to)
Section 8-509 of the Public Utilities)
Act Authorizing Use of Eminent)
Domain Power)

Docket No. 14-0652

CHIEF CLERK'S OFFICE
2014 NOV 14 A 11:00
ILLINOIS COMMERCE COMMISSION

PETITION TO INTERVENE

NOW COME James Agatucci and Jeanne Agatucci (collectively, the "Interveners"), by and through their attorneys, Westervelt, Johnson, Nicoll & Keller, LLC, and for their Petition to Intervene, state as follows:

1. A verified petition was filed by Ameren Illinois Company d/b/a Ameren Illinois ("Ameren") initiating this proceeding on October 28, 2014 in which Ameren seeks an order pursuant to Section 8-509 of the Public Utilities Act authorizing the use of eminent domain.

2. The names, addresses, and telephone numbers of the Interveners are:

James Agatucci
5806 N. Heinz Ln.
Edwards, IL 61528
[(309) 689-7530]

Jeanne Agatucci
5806 N. Heinz Ln.
Edwards, IL 61528
[(309) 689-7530]

3. Interveners own land and reside on or near land which is subject to this proceeding, and Interveners will be substantially affected by any decision of the Illinois Commerce Commission in this proceeding.

4. Interveners petition to intervene and be treated as active parties to this proceeding to protect their interests in this proceeding.

5. Interveners agree to accept service by electronic means as provided for in 83 Ill. Admin. Code 200.1050 by service upon Interveners' attorney at rholzgra@wjnkllaw.com.

6. In Ameren's verified petition initiating this proceeding, Ameren proposes a schedule under which Staff and Intervener Direct Testimony would be due by November 13, 2014, which day is the same day as the Prehearing Conference.

7. A schedule under which Staff and Intervener Direct Testimony is due on the same day as the Prehearing Conference will not allow parties to this proceeding sufficient time in which to present their testimony.

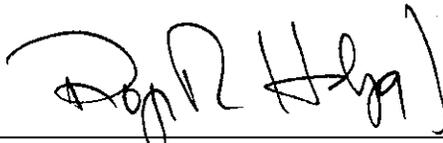
WHEREFORE, James Agatucci and Jeanne Agatucci respectfully request that they be granted leave to join as active parties to this proceeding and that any schedule adopted in this proceeding provide all parties with sufficient time in which to present their testimony.

Respectfully Requested,

James Agatucci and Jeanne Agatucci

WESTERVELT, JOHNSON, NICOLL & KELLER, LLC

By: _____



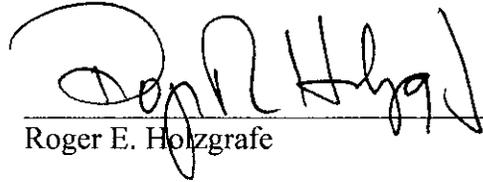
One of Their Attorneys

Roger E. Holzgrafe
Westervelt, Johnson, Nicoll & Keller, LLC
411 Hamilton Blvd, Ste 1400
Peoria, IL 61602
Telephone: (309) 671-3550
Facsimile: (309) 671-3588

VERIFICATION

STATE OF ILLINOIS }
 }SS
COUNTY OF PEORIA }

I, Roger E. Holzgrafe, being first duly sworn, state that I am an attorney representing James Agatucci and Jeanne Agatucci, that I have read the foregoing Petition to Intervene and am familiar with its contents, and that the matters set forth therein are true and correct to the best of my knowledge, information, and belief.



Roger E. Holzgrafe

Subscribed and Sworn to before me
this 12th day of November, 2014.



Notary Public



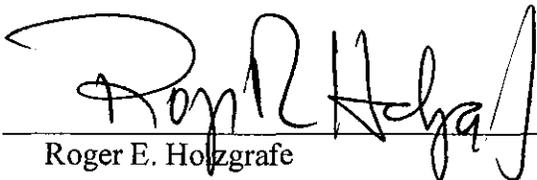
**STATE OF ILLINOIS
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Ameren Illinois Company)	
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)	Docket No. 14-0652
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NOTICE OF FILING

YOU ARE HERBY NOTIFIED that we have on the 12th day of November, 2014, forwarded to the Chief Clerk of the Illinois Commerce Commission, for filing in the above-captioned docket, the Petition to Intervene of James Agatucci and Jeanne Agatucci, a copy of which is hereby served upon you.

WESTERVELT, JOHNSON, NICOLL & KELLER, LLC

By: 
Roger E. Holzgrafe

Roger E. Holzgrafe
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Facsimile: (309) 671-3588

CERTIFICATE OF SERVICE

The undersigned certifies that on November 12, 2014, a copy of the foregoing document was served upon the individuals listed below by:

- Enclosing it in an envelope, properly addressed as indicated below, with first class postage prepaid at Peoria, Illinois; or
- Via electronic means (e-mail)*.
- Personal service.

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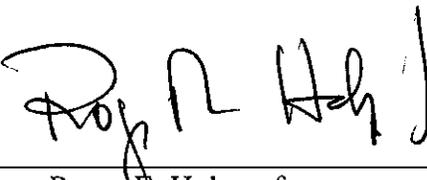
Richard C. Cramer Trust
c/o Barbara Cramer, Trustee
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Hanna City, IL 61536

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Roger E. Holzgrafe