

3. The Final Order wrongfully grants GBX's Verified Petition and, as a result, the Farm Bureau requests rehearing on the issues detailed hereinafter.

4. Pursuant to the Commission Rules of Practice, an application for rehearing may incorporate the "arguments made in prior pleadings and briefs" by specifying the document and page where such arguments were previously made to the Commission. 83 Ill. Adm. Code 220.880(b). As such, this Application incorporates arguments made in prior pleadings and briefs, and when doing so, specifies the location of said arguments pursuant to the Commission Rules of Practice.

II. Issues for Rehearing

A. Grain Belt Express Clean Line, LLC ("GBX") does not have the right to utilize Section 8-406.1 as an entity that is not a public utility.

The Commission should grant rehearing related to GBX's right to utilize Section 8-406.1 as an entity that is not a public utility, because as a non-public utility, GBX is not entitled to relief under this section. Plainly put, rehearing is required because (1) GBX admits that it is not a public utility under the PUA, (2) GBX is not a public utility as defined under Section 3-105 of the PUA, and (3) as a non-utility, GBX cannot apply for approval under Section 8-406.1 of the PUA.

On April 10, 2015, GBX filed an application under Section 8-406.1 of the Public Utilities Act ("PUA"), which section allows public utilities to seek approval to construct new high voltage transmission line projects on an expedited basis. GBX is not and does not allege in its application that it is a public utility. Section 8-406.1 states that "[a] public utility may apply for a certificate of public convenience and necessity pursuant to this Section for the construction of any new high voltage electric service line...." 220 ILCS § 5/8-406.1 (emphasis added). An entity

that is a “public utility” is a specific type of entity which the PUA defines and which has special rights and duties under the PUA, the rules and regulations of the ICC, and applicable case law.

On May 18 and 20, 2015, the Farm Bureau, Citizens & Property Owners (“CCPO”), Landowners Alliance of Central Illinois, NFP (“LACI”), and REX Encore Farms LLC moved to dismiss GBX’s application for a certificate under Section 8-406.1, on the basis and for the reason that GBX is not a public utility and, as a result, Section 8-406.1 of the PUA is not legally available to it. The ICC Staff filed a Response to Motions to Dismiss and agreed that GBX “is ineligible to submit Section 8-406.1 applications” and recommended that GBX’s application be dismissed without prejudice. On June 12, 2015, the Administrative Law Judge (“ALJ”) issued a Memorandum to this Commission also recommending that it grant the Motions to Dismiss and allow GBX leave to file an amended Application under Section 8-406 of the PUA.

During this Commission’s June 16, 2015 Open Meeting, Chairman Sheahan moved to deny the Motions to Dismiss, and without any discussion of the motion’s merits, of the ALJ’s Memorandum, or of the Chairman’s motion and recommendation, the ICC Commissioners voted 3-2 to deny the motions.¹ The Farm Bureau, LACI, and CCPO filed Motions to Reconsider the Commission’s decision, which the Commission denied on July 28, 2015, again on a 3-2 vote and without any discussion or explanation. The Final Order wrongly concludes that GBX may proceed under Section 8-406.1, absent a finding that GBX is a public utility under Section 3-105(a), and is contrary to both Illinois law and this Commission’s prior decisions.

As Commissioners McCabe and del Valle emphasize in their Dissenting Opinion, this is a case of first impression before the Commission, is a matter of great public importance, and the

¹ During the June 16th Open Meeting, after Chairman Sheahan moved to deny the motions to dismiss, Commissioner McCabe asked the ALJ if there has been any proceeding under Section 8-406.1 where the applicant did not assert that it was a public utility in its application. The ALJ confirmed that this is the first such case and that the motions raise a threshold issue, whether an entity has to be a public utility to file an application for expedited review. Commissioners McCabe and Del Valle voted against Chairman Sheahan’s motion.

action by three Commissioners to exercise jurisdiction under Section 8-406.1 in the face of recommendations to the contrary by both ICC Staff and the ALJ is unprecedented, contrary to Illinois law, and warrants rehearing and reversal by the Commission. “The majority opinion, ‘considers the arguments on the issue’ and then concludes that a non-public utility may apply for a CPCN under Section 8-406.1 without any discussion or analysis.” Dissenting Opinion, p. 2. The Farm Bureau, CCPO, LACI, REX Encore Farms, the ICC Staff, the ALJ, and Commissioners McCabe and del Valle repeatedly pointed out to this Commission, “[t]he majority’s conclusion that any non-public utility may ‘apply’ to be a public utility under 8-406.1 ignores the express language in Section 8-406.1(a)... and [n]o reasonable reading of ‘a public utility may’ would extend its meaning...to include entities not public utilities under the PUA that are not subject to Commission jurisdiction.” Dissenting Opinion, pp. 2-3. As the Farm Bureau, LACI, REX Encore Farms, the ICC Staff, the ALJ, and Commissioners McCabe and del Valle emphasize to the other Commissioners in their Dissenting Opinion, contrary to the Final Order, “[e]very order the Commission has heretofore entered under Section 8-406.1 included a finding that the applicant was a ‘public utility’ under the PUA.” Dissenting Opinion, p. 5

The majority of this Commission erroneously found, without analysis, that a non-public utility may be an applicant under Section 8-406.1 and this Commission should grant rehearing and reverse this finding as contrary to the PUA, all prior Commission precedent, and Illinois law. GBX admitted in its Verified Petition that it was not a public utility, and it is also clear that, based on the evidence in the record, the Commission erroneously concluded that GBX was a public utility. Neither during the pendency of the Commission proceedings, nor now, does GBX own, control, operate, manage, directly or indirectly, for public use, any plant, equipment, or property used, or to be used for or in connection with, electric transmission service in Illinois.

As further argument in support of its request for rehearing on the issues raised in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 11-26;
2. Reply Brief of Farm Bureau, p. 3;
3. Brief on Exceptions of Farm Bureau, pp. 3-6;
4. Initial Brief of LACI, pp. 10-14;
5. Reply Brief of LACI, pp. 2-6;
6. Brief on Exceptions of LACI, pp. 2-5;
7. Initial Brief of CCPO, pp. 6-7;
8. Reply Brief of CCPO, pp. 1-6;
9. Brief on Exceptions of CCPO, pp. 2-3;
10. Initial Brief of Mary Ellen Zotos (“Zotos”), pp. 2-3 and 12; and,
11. Brief on Exceptions of Zotos, p. 18.

B. GBX does not meet the Section 8-406.1(f) criteria for a CPCN.

1. The Project does not promote the development of an effectively competitive electricity market.

Section 8-406.1(f)(1) provides a pathway to a CPCN if an applicant establishes “that the Project will promote the development of an effectively competitive electricity market that operates efficiently, is equitable to all customers, and is the least cost means of satisfying those objectives.” GBX has not, and the Final Order makes the wrong conclusion. The evidence presented by GBX demonstrates that it does not have a clue whether customers will subscribe to its proposed project or whether it is necessary to promote the development of an effectively competitive marketplace. The evidence presented is not sufficient. GBX has not established that the Project is necessary to promote the development of an effectively competitive electricity market and therefore the Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 29-31;
2. Reply Brief of Farm Bureau, pp. 5-8;
3. Brief on Exceptions of Farm Bureau, pp. 6-10;
4. Initial Brief of LACI, pp. 15-34;
5. Reply Brief of LACI, pp. 10-13;
6. Brief on Exceptions of LACI, pp. 5-7;
7. Initial Brief of CCPO, pp. 10-11;
8. Reply Brief of CCPO, p. 2;
9. Brief on Exceptions of CCPO, pp. 4-5;
10. Initial Brief of Zotos, pp. 3 and 9-12;
11. Reply Brief of Zotos, pp. 2-4; and,
12. Brief on Exceptions of Zotos, pp. 8-10.

2. The Project is not least cost.

GBX has not established that the Project is the least cost option and the Final Order draws the wrong conclusion. In fact, as detailed in the arguments incorporated below, other alternative options exist which would be least cost. GBX is asking for a back-up plan for its field of dreams approach to recovering costs, by coming back to the Commission to comply with the financing condition proposed in the Final Order. The Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 31-33;
2. Reply Brief of Farm Bureau, pp. 8-9;
3. Brief on Exceptions of Farm Bureau, pp. 6-10;
4. Initial Brief of LACI, pp. 15-34;
5. Reply Brief of LACI, p. 13;
6. Brief on Exceptions of LACI, pp. 5-7;
7. Initial Brief of CCPO, pp. 11-12;
8. Reply Brief of CCPO, p. 5;
9. Brief on Exceptions of CCPO, pp. 4-5, 7-8, and 23;
10. Initial Brief of Zotos, pp. 12-18; and,
11. Brief on Exceptions of Zotos, pp. 8-10; 10-17.

3. GBX does not have the capability to efficiently manage and supervise the construction process as required by Section 8-406.1(f)(2).

GBX has presented no evidence that it is capable of efficiently managing and supervising the construction of the Project. The Final Order draws the wrong conclusion. GBX is a start-up company that has never built a transmission line. GBX's parent and sister companies have also never built a transmission line. Berry, Tr. 255. Because of the Final Order, a \$2.75B transmission construction project will be managed in Illinois by a small group of people with little relevant experience, and who could theoretically be managing up to \$10B of similar work all over the country. Illinois residents should not be forced to be a part of this new, risky business scheme. GBX has failed to present sufficient evidence, has therefore not met its statutory burden, and this issue should be reheard by the Commission.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 34-36;
2. Reply Brief of Farm Bureau, p. 9;
3. Brief on Exceptions of Farm Bureau, pp. 15-16;
4. Initial Brief of LACI, p. 34;
5. Initial Brief of CCPO, pp. 12-13;
6. Reply Brief of CCPO, pp. 4-5;
7. Brief on Exceptions of CCPO, pp. 8-9; and,
8. Brief on Exceptions of Zotos, pp. 18-20.

4. GBX does not have the capability to finance the construction of the Project without significant adverse financial consequences as required by Section 8-406.1(f)(3).

Clean Line's sole strategy for raising funds for its numerous projects around the country is private equity. For its \$10B national business venture, Clean Line raises money, runs out of money, and then it goes and asks investors for money again. Clean Line characterizes it as "project financing" because it does not raise new tranches of funds or commitments until it hits

certain project milestones and needs cash. With this plan, at no time has Clean Line or any of its subsidiaries had capital commitments for all of Clean Line's projected project costs, collectively or singularly. A conclusion that GBX established before the issuance of the Final Order that it had the ability to finance the Project is against the manifest weight of the evidence. GBX has not met its statutory burden regarding sufficient financing, the Final Order draws the wrong conclusions, and this issue should be reheard by the Commission.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 36-41;
2. Reply Brief of Farm Bureau, p. 10;
3. Brief on Exceptions of Farm Bureau, pp. 16-18;
4. Initial Brief of LACI, pp. 34-35;
5. Reply Brief of LACI, pp. 6-9, 13-16, and 17-19;
6. Initial Brief of CCPO, pp. 13-15;
7. Reply Brief of CCPO, pp. 4-5;
8. Brief on Exceptions of CCPO, pp. 9-12; and,
9. Brief on Exceptions of Zotos, pp. 18-20.

5. Conditions relating to grant of the CPCN.

The Final Order imposes a number of post-hearing conditions. Imposing the conditions is synonymous to swearing in a first year law student to practice law and issuing him an ARDC card, but not allowing the law student to exercise his lawyer status until he takes professionalism classes and passes a bar exam three years later. Better put, these conditions are items which should have been established by GBX as present and satisfactory in order to meet the statutory burden for Section 8-406.1 relief, but they did not. To not characterize these conditions as preconditions forces the Commission to invent its own process not detailed in the controlling statute and is a step outside of its bounds, despite the well-established principle that administrative bodies only have that jurisdiction conferred by the legislature, and may not

expand such jurisdiction. The Final Order allows GBX to delay in meeting its statutory burden. This should not be accepted, and these issues should be reheard by the Commission.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 41-42;
2. Reply Brief of Farm Bureau, p. 10;
3. Brief on Exceptions of Farm Bureau, pp. 18-19;
4. Initial Brief of LACI, pp. 35-37;
5. Reply Brief of LACI, pp. 14-16;
6. Initial Brief of CCPO, pp. 15-17;
7. Reply Brief of CCPO, p. 4;
8. Brief on Exceptions of CCPO, pp. 12-14;
9. Initial Brief of Zotos, pp. 19-20;
10. Reply Brief of Zotos, pp. 3-4; and,
11. Brief on Exceptions of Zotos, pp. 18-20.

C. GBX has not established that it is entitled to relief under Section 8-503.

Initially, it needs to be recognized that GBX is not eligible for Section 8-503 relief as a non-utility for the reasons stated previously herein. Secondly, it should be acknowledged that providing GBX with Section 8-503 relief is premature given all of the proposed contingencies which must be met prior to construction commencing, like having adequate financial commitments, adequate employees, etc. Because the issues related to Section 8-406.1 should be reheard as detailed above, the Section 8-503 issues should consequently be reheard. The Final Order gets it wrong on Section 8-503, and the Commission should rehear all issues related to Section 8-503.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 46-48;
2. Reply Brief of Farm Bureau, p. 12;
3. Brief on Exceptions of Farm Bureau, pp. 24-25;
4. Initial Brief of LACI, pp. 55-56;
5. Reply Brief of LACI, p. 19;
6. Initial Brief of CCPO, p. 19; and,
7. Brief on Exceptions of CCPO, pp. 20-21.

D. GBX's Accounting-Related Requests

1. Use of the FERC Uniform System of Accounts

The Farm Bureau asserts that GBX's requests related to FERC Uniform System of Accounts should have been denied as moot in the Final Order when its Verified Petition should have been denied for the reasons detailed herein. Therefore, the Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, p. 48;
2. Reply Brief of Farm Bureau, p. 12;
3. Brief on Exceptions of Farm Bureau, pp. 25-26;
4. Initial Brief of LACI, p. 56;
5. Reply Brief of LACI, p. 19;
6. Brief on Exceptions of CCPO, pp. 21-22; and,
7. Brief on Exceptions of Zotos, pp. 11-17.

2. Request to Maintain Books and Records Outside of Illinois

The Farm Bureau asserts that GBX's requests related to maintain books and records outside of Illinois should have been denied as moot in the Final Order when its Verified Petition should have been denied for the reasons detailed herein. Therefore, the Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, p. 48;
2. Reply Brief of Farm Bureau, p. 12;
3. Brief on Exceptions of Farm Bureau, pp. 25-26;
4. Initial Brief of LACI, p. 56;
5. Reply Brief of LACI, p. 19; and,
6. Brief on Exceptions of CCPO, pp. 21-22.

3. Request for Proprietary Treatment of Certain Information

The Farm Bureau asserts that GBX's requests related to proprietary treatment of certain information should have been denied as moot in the Final Order when its Verified Petition should have been denied for the reasons detailed herein. Therefore, the Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, p. 48;
2. Reply Brief of Farm Bureau, p. 12;
3. Brief on Exceptions of Farm Bureau, pp. 25-26;
4. Initial Brief of LACI, p. 56;
5. Reply Brief of LACI, p. 19; and,
6. Brief on Exceptions of CCPO, pp. 21-22.

E. The Verified Petition is moot as a result of the actions by the Missouri Public Service Commission.

Construction of the Project in Illinois is contingent upon the grant of authority from regulatory bodies in Kansas, Missouri, and Indiana, in addition to the Commission. Without the requisite authority from all applicable regulatory bodies, the Project cannot be constructed as proposed in the Final Order. The denial of GBX's Application for a Certificate of Convenience

and Necessity by the Missouri Public Service Commission (“MPSC”) should have rendered the granting of the Verified Petition moot in this proceeding. As the Farm Bureau previously argued before this Commission, the denial of GBX’s Application by the MPSC, along with the recent Circuit Court of Caldwell County Order which held that GBX has no authority to construct the proposed line through Caldwell County, Missouri, there will be no construction in Illinois by GBX due to the denials in Missouri. This Commission should consider additional evidence on this issue which occurred after the close of the evidentiary hearings, as described in Exhibit A, the Affidavit of Paul A. Agathen, a Missouri attorney who represents the Missouri Landowners Alliance (“MLA”). The Final Order erred on this issue. Thus, the Commission should rehear this issue.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 49-50;
2. Reply Brief of Farm Bureau, pp. 12-24;
3. Brief on Exceptions of Farm Bureau, pp. 26-27;
4. Initial Brief of LACI, pp. 12, 24, 33-34, 45-47, 50-51, and 56-59;
5. Reply Brief of LACI, pp. 8 and 19-20;
6. Brief on Exceptions of LACI, pp. 5-7 and 11-15;
7. Initial Brief of CCPO, pp. 2-3 and 19;
8. Reply Brief of CCPO, pp. 5-6;
9. Brief on Exceptions of CCPO, pp. 22-23; and,
10. Reply Brief of Zotos, p. 2.

F. The Final Order is an improper issuance of an advisory opinion.

The decision to grant the CPCN requested in the Verified Petition in the Final Order cannot be carried into effect because the Project line cannot be built through the state of Missouri as proposed. The Commission’s Final Order renders an improper advisory opinion. The Commission does not have the authority to provide advisory opinions. See *Securus*

Technologies, Inc. v. Illinois Commerce Comm'n, 2014 IL App (1st) 131716, ¶ 47 *appeal denied*, 20 N.E.3d 1263 (Ill. 2014). At best, the mootness of the Verified Petition makes the pleading an improper request for a declaratory ruling. The Verified Petition is neither captioned nor otherwise formed as a request for a declaratory ruling by the Commission. As such, the Final Order improperly rendered an advisory opinion and/or a declaratory ruling, and these issues should be reheard by the Commission.

As further argument in support of its request for rehearing in this section, the Farm Bureau by reference expressly restates and reincorporates the following arguments related to this issue as if fully restated herein:

1. Initial (Corrected) Brief of Farm Bureau, pp. 50-52;
2. Brief on Exceptions of Farm Bureau, pp. 26-27;
3. Initial Brief of LACI, pp. 56-59;
4. Reply Brief of LACI, pp. 19-20; and,
5. Brief on Exceptions of LACI, pp. 11-15.

WHEREFORE, the ILLINOIS AGRICULTURAL ASSOCIATION a/k/a the Illinois Farm Bureau, respectfully requests oral argument on this Application, that the Commission enter an Order approving this Application by ordering a rehearing on the issues detailed herein, and for such other and further relief as may be just and proper.

**Illinois Agricultural Association a/k/a
the Illinois Farm Bureau**

**Illinois Agricultural Association a/k/a the
Illinois Farm Bureau**

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One of Its Attorneys

By: Charles Y. Davis
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VERIFICATION

STATE OF ILLINOIS)
) SS
COUNTY OF SANGAMON)

Charles Y. Davis, being first duly sworn, deposes and says that he is authorized to execute this Application for Rehearing; 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 and correct in substance and in fact.

Charles Y. Davis
Charles Y. Davis

SUBSCRIBED AND SWORN to before me this 14th day of December, 2015.

Kristina Leigh Miller
Notary Public



PROOF OF SERVICE

The undersigned certifies that a copy of the foregoing instrument was served upon:

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via electronic transmission on this 14th day of December, 2015.


