

# BAKER & MILLER PLLC

ATTORNEYS and COUNSELLORS  
2401 PENNSYLVANIA AVENUE, NW  
SUITE 300  
WASHINGTON, DC 20037

TELEPHONE: (202) 663-7820  
FACSIMILE: (202) 663-7849



William A. Mullins

Direct Dial: (202) 663-7823  
E-Mail: [wmullins@bakerandmiller.com](mailto:wmullins@bakerandmiller.com)

December 19, 2006

**VIA HAND DELIVERY**  
**FILING CONTAINS COLOR**

The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, DC 20423-0001

218308

ENTERED  
Office of Proceedings

DEC 19 2006

Part of  
Public Record

Re: Finance Docket No. 34974  
Keokuk Junction Railway Co. d/b/a/ Peoria & Western Railway – Lease And  
Operation Exemption – BNSF Railway Company

Dear Secretary Williams:

Enclosed on behalf of Keokuk Junction Railway d/b/a/ Peoria & Western Railway ("KJRY") are an original and eleven copies of KJRY's Reply to the Motion for Extension of Time filed by Ameren Energy Fuels and Services Company on December 15, 2006 ("Reply"). Please note that Exhibit No. 1 constitutes a color map.

Please acknowledge filing of the attached Reply by date stamping the extra copy provided for that purpose and returning that copy with the courier for return to my offices. If there are any questions concerning this filing, please contact me by telephone at (202) 663-7823 or by e-mail at [wmullins@bakerandmiller.com](mailto:wmullins@bakerandmiller.com).

Sincerely,

William A. Mullins

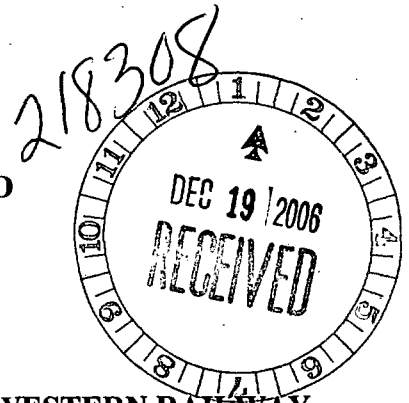
Enclosures

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

**STB FINANCE DOCKET NO. 34974**

**KEOKUK JUNCTION RAILWAY CO. D/B/A PEORIA AND WESTERN RAILWAY  
— LEASE AND OPERATION EXEMPTION —  
BNSF RAILWAY COMPANY**

**REPLY TO MOTION FOR EXTENSION OF TIME**



**ENTERED  
Office of Proceedings**

**DEC 19 2006**

**Part of  
Public Record**

**Daniel A. LaKemper  
Keokuk Junction Railway Co.  
1318 S. Johanson Road  
Peoria, IL 61607  
Tel.: (309) 697-1400  
Fax: (309) 697-8486**

**William A. Mullins  
Robert A. Wimbish  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave, NW  
Suite 300  
Washington, DC 20037  
Tel: (202) 663-7820  
Fax: (202) 663-7849  
Attorneys for Keokuk Junction Railway  
Co. d/b/a Peoria & Western Railway**

**DATED: December 19, 2006**

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

---

**STB FINANCE DOCKET NO. 34974**

---

**KEOKUK JUNCTION RAILWAY CO. D/B/A PEORIA AND WESTERN RAILWAY  
— LEASE AND OPERATION EXEMPTION —  
BNSF RAILWAY COMPANY**

---

**REPLY TO MOTION FOR EXTENSION OF TIME**

---

**Daniel A. LaKemper  
Keokuk Junction Railway Co.  
1318 S. Johanson Road  
Peoria, IL 61607  
Tel.: (309) 697-1400  
Fax: (309) 697-8486**

**William A. Mullins  
Robert A. Wimbish  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave, NW  
Suite 300  
Washington, DC 20037  
Tel: (202) 663-7820  
Fax: (202) 663-7849  
Attorneys for Keokuk Junction Railway  
Co. d/b/a Peoria & Western Railway**

**DATED: December 19, 2006**

**BEFORE THE  
SURFACE TRANSPORTATION BOARD**

---

**STB FINANCE DOCKET NO. 34974**

---

**KEOKUK JUNCTION RAILWAY CO. D/B/A PEORIA AND WESTERN RAILWAY  
— LEASE AND OPERATION EXEMPTION —  
BNSF RAILWAY COMPANY**

---

**REPLY TO MOTION FOR EXTENSION OF TIME**

---

Keokuk Junction Railway Co. d/b/a Peoria & Western Railway ("KJRY") hereby responds in opposition to the motion of Ameren Energy Fuels and Services Company ("Ameren") for an extension of time ("Motion") to respond to KJRY's petition for exemption ("Petition") filed in this proceeding on December 7, 2006. As discussed below, an extension of time under the circumstances is unwarranted and would prejudice a prospective KJRY customer located adjacent to Ameren's plant as well as KJRY itself.

**BACKGROUND**

On August 4, 2006, KJRY filed a verified notice of exemption (the "Notice") pursuant to the provisions at 49 CFR 1150.41, et seq., to lease and operate a line of railroad approximately 42.1 miles in length that is currently owned by BNSF Railway Company ("BNSF"). In response to a request from Ameren Energy Fuels and Services Company ("Ameren"), on August 10, 2006, the Board issued a "housekeeping stay" to seek further information and is so doing prevented KJRY from consummating the proposed transaction until further Board order. Between August 10 and November 17, KJRY and Ameren engaged in numerous discussions in an effort to resolve Ameren's concerns. These discussions did not result in a settlement, as Ameren rejected

KJRY's various offers, including an offer to freeze rates for future Union Pacific ("UP")/KJRY movements.<sup>1</sup> On November 17, 2006, Ameren filed a petition to reject KJRY's notice or to revoke the exemption ("Petition to Revoke"). On December 7, KJRY replied to the Petition to Revoke and also filed a Petition for Exemption seeking authority for the same transaction. KJRY also filed a request for a Protective Order. On December 13, Ameren requested that specific terms of the proposed Protective Order be stricken and KJRY replied on December 14. On December 15, eight days after receiving the Petition for Exemption, Ameren filed the subject Motion. KJRY hereby replies in opposition.

### **ARGUMENT**

Ameren's Motion seeks an extension until January 8<sup>th</sup> or until 20 days after issuance of a Protective Order, whichever is later. The alleged basis for the extension request is that Ameren's outside counsel and its consultant need to see the Highly Confidential version of the Petition for Exemption, including unredacted versions of Dr. Brennan's verified statement and the lease agreement in order to "move forward" with its arguments. Careful examination of Ameren's Motion in light of the circumstances surrounding its tactics in this proceeding reveals that Ameren's Motion should be denied. Ameren misunderstands the nature of the petition for exemption process, has access to any information necessary for it to make its arguments, and any further delay is contrary to the interests of the other shippers on the line.

---

<sup>1</sup> KJRY's offer would have resolved Ameren's major concern that KJRY would raise rates for UP/KJRY movements to Ameren's Duck Creek plant, thus preventing Ameren from benefiting from the competition between UP/KJRY's and BNSF's routes into Duck Creek. By rejecting this offer, it would appear that Ameren's true objective has nothing to do with competition. Rather, Ameren is using the Board and its procedures to prevent the transaction from going forward so that Ameren can buy or lease the line for itself and control movements into and out of an industrial plant that is adjacent to Duck Creek.

Ameren presumes that it is automatically entitled to reply to the Petition before the Board rules on the merits and that, therefore, the Board should waive its normal rules to give Ameren additional time to respond. But this premise is incorrect, because Ameren misunderstands the nature of an exemption proceeding. While Ameren's arguments may be appropriate if the transaction were being considered under the application process, they are not appropriate here.

The petition for exemption process is designed to be an expedited process and is not designed to allow the public an automatic right to participate. 49 CFR 1121.4 specifically notes that exemption proceedings are informal and that "public comments are generally not sought during consideration of exemption proposals." Ameren would turn this regulation on its head and require the Board to grant whatever time is necessary for the public to file comments simply because Ameren has asked for it. While the Board may seek additional information from the public if it so desires, this is a decision for the Board to make and they can only do so if certain findings are made. The rules simply don't require the Board to change its regulations or grant waivers to provide additional time so that Ameren can make whatever arguments Ameren desires to make whenever it wants to make them.<sup>2</sup>

Notwithstanding the fact that the petition for exemption procedures do not provide for public input unless the Board so decides, Ameren relies on 49 CFR 1104.13 as authority for its right to reply to the Petition. This regulation gives Ameren the right to file a reply to any motion or petition no later than 20 days after the filing of any such motion or petition. As such, Ameren does have a right to file a reply on December 27, but nothing in that regulation gives Ameren the right to delay the process as Ameren suggests.

---

<sup>2</sup> Under 49 CFR Part 1121, KJRY was not even required to serve Ameren a copy of its December 7<sup>th</sup> Petition. KJRY nevertheless served Ameren. In so doing, KJRY's has provided Ameren with more notice than is required by the rules.

Indeed, none of the precedents cited by Ameren support such a right or stand for the proposition that a party is entitled to extend its 20 day period for filing initial comments on a petition for exemption. Finance Docket No. 34536 involved an extension of time to supplement a petition to revoke, not to extend the 20 day period. The other cases, Docket No. AB-33, Finance Docket Nos. 34335, 34281, 42072, 42071, and 33200 likewise do not involve 20-day extensions for the filing of reply to a petition for exemption. (In fact, most of these cases involved extensions of time far more modest than that requested here by Ameren.) Ameren does not cite even one case that squarely supports the relief it is requesting nor can it. The petition for exemption process is not intended, absent further Board request for additional information, to provide a forum for the public to gather evidence, extend deadlines, and then file that evidence. As such, Ameren should make whatever arguments it would like to make on December 27 and then allow the Board to decide whether to seek additional information and allow further time for filing further evidence. That is the proper procedure to follow in a petition for exemption case.

The fact is, however, that Ameren already has had more than sufficient time to analyze its arguments and present its case as it has done in the Notice of Exemption proceeding. It doesn't need additional time or to view the "Highly Confidential" version of the Petition for Exemption to "move forward" with its response or its arguments. Ameren conveniently overlooks the fact that the issues surrounding KJRY's potential lease of the BNSF line have been around since August. What is more, Ameren has had an almost entirely unredacted copy<sup>3</sup> of the lease for months and could have hired a consultant to analyze the lease, develop arguments, and present

---

<sup>3</sup> The only information redacted from the copy of the lease that was provided to Ameren in the Finance Docket No. 34918 proceeding were the actual dollar amounts, such as the per-car monetary amounts that BNSF would pay KJRY and the actual dollar lease amounts KJRY pays to BNSF. Ameren does not need these actual dollar amounts to make its case.

its views of the competition issues months ago. Having chosen instead to sit idle while all of the relevant data has long been available to it, Ameren wants an extension that would both effectively reward Ameren for such a choice and further delay the Board's processes. Having chosen its litigation tactics, Ameren should be required to live with them.

Ameren claims to need the Highly Confidential version of the Petition to make its case, but this is not true. Other than the actual per-car amounts that BNSF intends to pay KJRY and the actual lease amounts KJRY would pay BNSF, there is nothing in Dr. Brennan's verified statement that has not been in Ameren's possession for months. The legal comments are entirely public, and as noted, Ameren has had the lease agreement for months. Ameren can make its arguments, as they already did in the Finance Docket No. 34918 proceeding, without the specific dollar amounts in Dr. Brennan's statement. Indeed, the lack of access to these specific dollar amounts has not prevented Ameren from fully making its competitive arguments in the related proceeding. It is curious that Ameren now says they cannot "move forward" without this information when it has proven to be fully capable of moving forward in the past.

Indeed, if anything, Ameren has all the information necessary to make its case. Ameren knows what the UP/KJRY overall through rate is (KJRY only has knowledge of its required portion) and Ameren knew what BNSF's rate was at the time Ameren opted for UP/KJRY service. Ameren will know what BNSF's quoted through rate will be in the future (the lease does not allow KJRY to participate in BNSF's pricing to Duck Creek or to know BNSF's rate) and Ameren that will know UP/KJRY quoted rates in the future. Thus, to the extent that Ameren alleges competitive harm, Ameren alone possesses the data necessary to prove its case. Ameren doesn't need additional time to accumulate this information.

Granting an extension of time and/or further delaying the approval of the lease transaction will harm other shippers that intend to use the line and who support the transaction. Ameren would have the Board believe that only its interest in the transaction is the only relevant consideration, but the public interest demands more. There are two active shippers, Hitchcock Scrap and United Paving & Construction, located on the line, but these shippers currently have to transload their inbound and outbound movements due to the suspension of service by BNSF.<sup>4</sup> Both of these shippers support the transaction and have requested expedited consideration due to the fact that direct rail service via KJRY would produce significant transportation savings. The Board should consider the costs to these shippers of any continued delay.

Of a more urgent nature is yet another new source of traffic. Central Illinois Energy Cooperative, Inc. ("CIE") is constructing an ethanol plant adjacent to Duck Creek. As the photograph attached as Exhibit No. 1 to this Reply shows, this plant is under extensive active construction. When completed, the plant is projected to generate up to 2,000 carloads per year. If the lease goes forward, CIE will be able to move this traffic via either UP/KJRY or BNSF/KJR,<sup>5</sup> putting it in the same position as Ameren. But unlike Ameren, who sees conspiracies and nefarious purposes, CIE sees the benefits of the proposed transaction and has

---

<sup>4</sup> As noted in the Petition, the line is currently inactive due to BNSF suspending active movements over the line approximately a year ago. Since that time, no track maintenance has been done and the line has deteriorated. In fact, the major purpose of the lease is to restore the line, bring it back to operating conditions, restore service, and provide rail opportunities for new shippers. Yet, the longer the regulatory process takes, the more expensive such undertakings will become.

<sup>5</sup> BNSF did not place any paper barriers on the proposed lease transaction. Accordingly, CIE would enjoy the benefits of UP and BNSF competition to its plant, with KJRY being the railroad physically serving the plant. It is ironic that BNSF, hearing the Board's concerns over paper barriers, especially those of Commissioner Mulvey, is being punished by the delay caused by Ameren's unjustified conspiracy theories.

asked the Board to expedite its consideration of the Petition.<sup>6</sup> Indeed, the City of Canton, through its mayor, Rodney W. Heinze, has urged the proposed KJRY-BNSF lease transaction to be approved as soon as possible, noting the importance of KJRY service to meet CIE's needs. See Exhibit 2, attached hereto.

And what has Ameren's reaction been to CIE's rail transportation needs? Ameren has said that if the transaction goes forward, it will cancel the lease that it had entered into with CIE allowing CIE to use a portion of Ameren's industrial spur. Ameren has also stated that it may allow the lease to continue but if, and only if, CIE receives service only from BNSF, not from KJRY. Thus Ameren is content to force CIE to remain captive to BNSF or to cut CIE off from rail service completely. These are not the actions of a shipper that claims to be a good corporate citizen concerned over the public interest.<sup>7</sup>

Because of the holidays, KJRY would have been willing to grant an extension to January 8 but no later. However, given the importance of CIE's situation, it was necessary for KJRY to consult first with CIE about the extension request, with the aim of negotiating a mutually acceptable extension of time with Ameren. Unfortunately, KJRY never had such an opportunity. As Exhibit 3 (a copy of the e-mail from Ameren's counsel seeking KJRY's support or

---

<sup>6</sup> KJRY currently is moving construction materials and plant components over its existing east-west line to a point near Canton, where the traffic completes its move to the plant via truck. KJRY understands that certain plant components that will need to be transported by rail to the work site are too large for final transfer by truck. Accordingly, delay in the handling of this petition equally delays a resolution among KJRY, Ameren, and CIE of the transportation issues confronting CIE. Delay also jeopardizes CIE's construction schedule and put tens of millions of dollars in private investment, several million dollars of taxpayers' investment, and many badly needed local jobs at risk.

<sup>7</sup> Ameren's argument that delay does not hinder CIE because BNSF is obligated to serve CIE whether or not the lease goes forward rings hollow. BNSF is not serving the line, has suspended service for over a year, and has made no assurances to CIE that service would be restored. See Exhibit C to the Petition.

nonobjection to the extension request) shows, KJRY was given a mere 2 hours to consent to Ameren's request for an extension.<sup>8</sup> Despite this unreasonable deadline, KJRY nevertheless attempted to contact CIE regarding the extension. CIE, however, objected to the extension request. See Exhibit 4, which is a copy of CIE's e-mail objecting to the extension request. Given Ameren's conduct toward CIE and CIE's pressing need for rail service, it is not surprising that CIE would object. With CIE's objection, KJRY could not in good faith support even a modest extension to January 8.

In the end, it appears that Ameren's goal is not to reach a settlement, but rather to delay and obstruct the process regardless of the costs to other shippers, BNSF, and KJRY in the form of added legal expenses and higher prospective rehabilitation costs. The basis for the extension appears to be one of Ameren's own making. Outside of its tactics in the Finance Docket No. 34918 proceeding, the first of Ameren's obvious delay tactics here was its effort to strike portions of the requested Protective Order. This maneuver did nothing but extend the wrangling between the parties and prevent Ameren from obtaining the redacted information from the Petition that it claims to need. Moreover, in light of its decision to quibble over the proposed Protective Order, Ameren was fully aware that the Board would need some time to address the matter. Considering KJRY's clearly-articulated bases for seeking expedited handling of its Petition, Ameren would have acted appropriately and responsibly if it had requested an extension of time concurrently with its attack on the proposed Protective Order. Instead, having already consciously thrown delay into the process by bickering over the Protective Order, Ameren has admittedly waited until the last possible day (under the strictures of 49 CFR 1104.7(b)) to seek

---

<sup>8</sup> Given that Ameren has known for some time that it wanted an extension, and obviously spent a significant amount of legal time and expense to draft its nine page extension request (eight days), one would have thought KJRY would be given more than 2 hours to respond.

an extension for filing its reply. The Board should not suborn such delay tactics under the circumstances by granting in full Ameren's extension request.

Ultimately, Ameren has not made its case for such a substantial extension of time. As noted, it already has all of the information necessary to prepare and file a comprehensive reply to the Petition. Even if it were true that examination of redacted material was somehow necessary for Ameren to respond fully to the Petition, this redacted material (which is very limited scope, involving only the fixed per-car fees that BNSF proposes to pay to KJRY and the rent that KJRY would pay to BNSF) constitutes but a very small portion of the Petition and the argument in favor of the Petition. Granting Ameren such a lengthy extension clearly would give Ameren a procedural windfall. Through such an extension, Ameren would enjoy considerable additional time to formulate its reply. As discussed above, most, if not all, of Ameren's a reply would not depend upon Ameren's examination and/or discussion of the redacted material. Thus, there is no justifiable reason to grant Ameren 20 days *from the date of the issuance of the Protective Order* to file its reply – it cannot conceivably need 20 days from the receipt of that limited material to complete its reply.

Because it is readily apparent that Ameren desires to buy or lease the line for its own use, Ameren's true motive here is to prevent the transaction from going forward so that it can force a transaction to its own liking, either through a bargain basement sale by BNSF or through the OFA process, which would be triggered by BNSF's abandonment of the line, which could happen if the lease is not allowed to go forward.. The public interest demands more. The best way to serve that public interest is to deny the extension and allow the transaction to be consummated.

## CONCLUSION

KJRY's Petition provided a complete and thorough depiction of the proposed transaction, supplied detailed expert testimony, and presented legal analysis to show why the exemption was appropriate. Consistent with the Board's rules under 49 CFR Part 1121, the Board can and does move forward with such petitions for exemption without seeking public input and without providing parties an expanded time frame to file comments. If Ameren desires to comment, it should do so within the timeframes provided by the rules. It has more than enough information to make its initial case and to request the Board to seek additional information. Further delay only serves to disadvantage other interested shippers and contribute to the deterioration of the line. For these reasons, Ameren's request for an extension of time to file a reply to KJRY's Petition should be denied.

Respectfully submitted,

Daniel A. LaKemper  
Keokuk Junction Railway Co.  
1318 S. Johanson Road  
Peoria, IL 61607  
Tel.: (309) 697-1400  
Fax: (309) 697-8486



William A. Mullins  
Robert A. Wimbish  
BAKER & MILLER PLLC  
2401 Pennsylvania Ave, NW  
Suite 300  
Washington, DC 20037  
Tel: (202) 663-7820  
Fax: (202) 663-7849

Attorneys for Keokuk Junction Railway Co. d/b/a  
Peoria & Western Railway

December 19, 2006

## **CERTIFICATE OF SERVICE**

I hereby certify that I have on this 19<sup>th</sup> Day of December 2006, caused the foregoing Reply to Motion for Extension of Time in Finance Docket No. 34974 to be served upon all known parties of record by first class mail, postage prepaid, or by more expeditious means.

  
\_\_\_\_\_  
Robert A. Wimbish

EXHIBIT 1



**CITY OF CANTON**

2 North Main, Canton, Illinois 61520 • Telephone (309) 647-0065 • Facsimile (309) 647-2348  
Rodney W. Heinze, Mayor

December 8, 2006

The Honorable Vernon A. Williams  
Secretary  
Surface Transportation Board  
1925 K Street, N.W.  
Washington, D.C. 20423-0001

RE: STB Finance Docket No.34918  
STB Finance Docket No. 34974  
*Keokuk Junction Railway Co., d/b/a Peoria & Western Railway – Lease and  
Operation Exemption – BNSF Railway Co.*

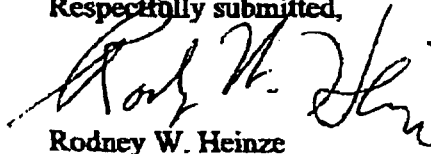
Dear Secretary Williams:

I am writing to support the proposed lease of the BNSF line between Vermont, Canton and Farmington, Illinois to Keokuk Junction Railway Co., d/b/a Peoria & Western Railway ("KJRY").

As you know, KJRY purchased and restored service to the former Toledo, Peoria & Western Railway line through Canton last year. KJRY has made a considerable investment in rehabilitating that line and is working with us to promote economic growth in the area. The restoration of service to the BNSF line through Canton (which has not been operated in many years) will assist a number of local businesses, including the new Central Illinois Energy ("CIE") plant currently being built south of the City of Canton. It is critical to the economic revitalization of our area that viable rail service be available to our businesses, and, in particular, new businesses such as CIE.

Many local farmers and residents have invested in CIE, and I understand that CIE needs direct rail service in the very near future. I urge the Board to act quickly to grant KJRY authority to operate this Line, so the CIE's plant can be completed on schedule.

Respectfully submitted,



Rodney W. Heinze



"Brown, Sandra L."  
<Sandy.Brown@troutmansanders.com>

12/15/2006 11:59 AM

To <wmullins@bakerandmiller.com>

cc

bcc

Subject Extension of Time Request

Bill,

As you and I briefly discussed on Wednesday, Ameren intends (TODAY) to request an extension of time in FD NO. 34974. The request is based upon the fact that Ameren and its expert need to see the Highly Confidential version of the Petition in order to fully respond and the fact that several major holidays occur during the normal 20 days. We are asking that the extension be granted until 20 days after the protective order is imposed or Jan. 8, whichever is later. While you have stated in a recent email to me that Ameren's decision to object to the language of the protective order in FD 34974 "does not bode well for constructive conversations in the future between us or our clients" I am nonetheless, attempting again to seek your consensus on a motion Ameren intends to file. Just so we are very clear, 49 CFR 1104.7(b) requires that Ameren file its request by today. So if I do not hear back from you by 2:00 pm, we will need to move forward on filing the request today without your response and we intend to tell the Board that we did not receive a response from you. If you do respond, please be aware that we intend to inform the Board of your response.

Thank you.

*Sandra Brown*

**Troutman Sanders LLP**

401 Ninth Street, NW, Suite 1000

Washington, DC 20004

(202) 274-2959 - Direct line

(202) 841-0067 - Mobile

(202) 654-5603 - Direct fax

Firm web site: <http://www.troutmansanders.com>

---

IRS Circular 230 disclosure: To ensure compliance with requirements imposed by the IRS, we inform you that any tax advice that may be contained in this communication (including any attachments) is not intended or written to be used, and cannot be used, for the purpose of (i) avoiding any penalties under the Internal Revenue Code or (ii) promoting, marketing or recommending to another party any transaction(s) or tax-related matter(s) that may be addressed herein.



lakemper@mtco.com  
12/15/2006 12:17 PM

To wnullins@bakerandmiller.com  
cc jm1carr@aol.com  
bcc  
Subject [Fwd: RE: BNSF Lease to KJRY]

----- Original Message -----  
Subject: RE: BNSF Lease to KJRY  
From: "Mike Smith" <msmith@centralillinoisenergy.com>  
Date: Fri, December 15, 2006 11:16 am  
To: lakemper@mtco.com  
Cc: jwerth@centralillinoisenergy.com  
"Toni Dillefeld" <tonid@centralillinoisenergy.com>  
-----

Mr. LaKemper:

As I stated in my letter to the STB and confirmed in our phone conversation this morning, any further delays in an STB decision is extremely detrimental to the construction project of Central Illinois Energy.

Michael W. Smith  
Central Illinois Energy  
PO Box 111  
Canton, IL 61520  
309/668-3299  
309/647-6350 (fax)  
309/224-2701 (cell)  
msmith@centralillinoisenergy.com