

**ILLINOIS COMMERCE COMMISSION
DOCKET NOS. 06-0070 / 06-0071 / 06-0072 (CONSOLIDATED)**

**REBUTTAL TESTIMONY
OF
JOHN B. HOLLIBAUGH**

**Submitted On Behalf
Of
AMEREN COMPANIES**

May 26, 2006

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REBUTTAL TESTIMONY

OF

JOHN B. HOLLIBAUGH

Q. Please state your name, employer, job title, and business address.

A. My name is John B. Hollibaugh. I am employed by Ameren Services Company (“Ameren Services”) as its Managing Supervisor – AMR Implementation. My office is located at 370 S. Main Street, Decatur, Illinois, 62523. I have been employed by Ameren Services, and previously Illinois Power Company (“Illinois Power”), for a total of 32 years.

Q. What are your responsibilities as Managing Supervisor – AMR Implementation?

A. I am responsible for the implementation of automated metering reading in 14 of Ameren Companies’ Operating Centers in Illinois, collectively referred to as the AMR Illinois Expansion Project.

Q. Please describe your educational and professional credentials.

A. I earned a Bachelor of Science degree in Electrical Engineering from Southern Illinois University – Carbondale in 1973. During my employment with Ameren Services and Illinois Power, positions that I have held specifically related to the subject testimony include: Supervisor - Instrumentation Engineering (including responsibility for Electric Metering Standards), and Director –Asset Performance

23 and Compliance Management (including responsibility for Corporate Safety,
24 Electric and Gas Training, and Electric and Gas Operations Compliance).

25 **Q. What is the purpose of your rebuttal testimony?**

26 A. I am testifying in response to certain claims and statements made by IBEW
27 witnesses Matt J. Moore, Daniel F. Miller, and Tom Peterson, filed on behalf of
28 the IBEW Local Unions 51 and 702, regarding the Ameren Companies' proposed
29 Metering Services tariffs.

30 **Q. What does your rebuttal testimony conclude?**

31 A. The IBEW witnesses make many incorrect and misleading statements about the
32 skills, training, experience, and qualifications of employees of Cellnet and
33 Terasen, who will deploy the AMR system for the Ameren Companies. Contrary
34 to the IBEW's position, Cellnet and Terasen employees are abundantly qualified
35 to perform the limited scope of work that they are being hired to perform, and
36 they have and will perform this work in the manner required by Administrative
37 Code Part 410. Because each IBEW witness's testimony is essentially identical,
38 my conclusion applies to all of the IBEW testimonies.

39 **DESCRIPTION OF WORK AT ISSUE**

40 **Q. Exactly what work will be done by Cellnet and Terasen employees in**
41 **conjunction with deployment of the AMR system?**

42 A. Their work will be limited to very specific types of meters, specifically, self-
43 contained, socket, single-phase and network, consumption-only meters at 240-volt
44 and below. This is the type of meter that is installed on most homes, apartments,
45 and small businesses. The scope of work required to replace these types of meters

46 is very limited. The work essentially involves removing a non-automated meter
47 from a socket, inserting an automated meter in its place, and recording details
48 about the two meters. Various safeguards are taken to ensure that the process is
49 done safely, but that is the basic task.

50 **Q. IBEW witness Miller claims that Ameren has not stated whether it knows the**
51 **present level of skills, training, and experience that Cellnet or Terasen**
52 **personnel possess (Miller Lines 333-337). There are similar claims from**
53 **Moore (Lines 307-311) and Peterson (Lines 362-366). Is this true?**

54 A. No. Ameren provided this information over objection in the Supplemental
55 Response to Data Request No. IBEW 2-14, the Supplemental Response No. 2 to
56 Data Request No. IBEW 2-14, the Supplemental Response No. 2 to Data Request
57 No. IBEW 2-15, and the Supplemental Response No. 2 to Data Request No.
58 IBEW 2-19. As stated in the responses to these data requests, the Ameren
59 Companies will supervise and monitor the work of Cellnet and Terasen to ensure
60 that the persons who install and operate the AMR system observe the
61 requirements of Part 410, and that they otherwise utilize safe work practices and
62 perform tasks in a workmanlike manner.

63 **Q. Each of the IBEW witnesses describes the training and qualifications of**
64 **various categories of IBEW workers and conclude that unless Cellnet and**
65 **Terasen employees have the same or comparable training and qualifications,**
66 **then these Cellnet and Terasen employees are not qualified to perform work**
67 **related to the AMR deployment. Do you agree?**

68 A. No. The work that Cellnet and Terasen employees will perform, as described
69 above, is very limited in scope in comparison to the job duties and descriptions of
70 IBEW personnel. For example, AmerenIP journeyman metermen,
71 AmerenCILCO journeyman metermen, and AmerenCIPS meter technicians work
72 with complicated programmable three-phase commercial electric meters. They
73 need to understand various mathematical and trigonometric concepts involving
74 phase angles, power factors, and the effects from reactive loads. They must wire
75 instrument transformers into metering circuits in a particular arrangement in order
76 to assure proper energy measurement. The Cellnet and Terasen employees, on the
77 other hand, handle no programming, no three-phase, no technical concepts, and
78 no wiring. Their work is limited to plugging and unplugging the socket meters,
79 with prudent precautionary steps. These lines of work are drastically different
80 from each other.

DISCUSSION REGARDING RELEVANT TRAINING

82 **Q. IBEW witness Miller discusses the responsibilities and training of an**
83 **AmerenCIPS journeyman lineman. Is that a reasonable comparison?**

84 A. No. The responsibilities and training for linemen are far broader than the limited
85 responsibilities to be assumed by personnel involved in the AMR deployment.
86 For example, AmerenCIPS linemen are trained to perform the following
87 functions, among others: (1) climbing poles; (2) driving trucks with trailers; (3)
88 operating basket controls; (4) digging holes with a line truck auger; (5) setting a
89 pole with a truck boom; (6) reading construction designs; (7) using air
90 compressors; (8) stubbing poles; (9) installing anchors; (10) establishing job site

Respondents' Exhibit 30.0
(Revised)

91 protection from traffic; (11) using cutters, presses, hoists, gins, capstans, kellem
92 grips, and various line tools; (12) recognizing, handling, and installing various
93 conductors, splices, sleeves, guys, cross-arms, insulators, and a variety of pole
94 hardware; (13) framing and constructing poles according to a variety of
95 construction standards; (14) installing, connecting, replacing, and removing
96 single-phase and three-phase line transformers in a variety of electrical
97 configurations; (15) installing, repairing, and removing streetlights; (16)
98 performing pole top rescue; (17) stringing, sagging, attaching, splicing, and
99 energizing overhead conductors; (18) installing and maintaining fuse links; (19)
100 installing and maintaining line disconnect switches; (19) fire fighting; (20)
101 recognizing, installing, replacing, and removing current and potential
102 transformers; (21) recognizing, installing, and replacing line capacitors; (22)
103 installing and maintaining services; (23) installing and replacing electric meters;
104 (24) PCB clean-up; (25) installing line guards; (26) following Workers Protection
105 Assurance procedures; (27) grounding circuits; (28) installing, replacing, and
106 removing lightning arrestors; (29) installing, replacing, and removing reclosers
107 and sectionalizers; (30) operating load-break tools; (31) line switching; (32)
108 primary circuit troubleshooting; (33) operating trenchers, backhoes, and boring
109 equipment; (34) installing, connecting, and splicing underground cables; (35)
110 installing, connecting, replacing, and removing pad-mounted transformers; (36)
111 installing, connecting, replacing, removing, and operating pad-mounted
112 switchgear. The personnel who will deploy the residential-type electric meters for
113 the AMR system will perform only the very limited meter exchange.

114 Consequently, there is no reason why these personnel should need to demonstrate
115 that same qualifications and training as an AmerenCIPS lineman.

116 **Q. Are you aware of any relationship between the IBEW Locals and Terasen,**
117 **one of the companies cited in the IBEW testimony and whom the IBEW**
118 **witnesses claim will use unqualified employees?**

119 A. It is my understanding that the IBEW Locals 51 and 702 have reached an
120 agreement with Terasen and will be representing Terasen employees for this
121 AMR deployment. These employees will be trained in the same manner as if they
122 were non-union employees.

123 **Q. The IBEW witnesses claim that 40 hours of training is not adequate for the**
124 **personnel who will deploy the residential-type electric meters for the AMR**
125 **system (Miller Lines 354-372, Moore Lines 328-348, and Peterson Lines 384-**
126 **404). Do you agree?**

127 A. No. As stated previously, the personnel who will deploy the residential-type
128 electric meters for the AMR system will have a very limited scope. The closest
129 classification the Ameren Companies have to this limited line of work is the
130 AmerenIP meter changer. The total classroom time AmerenIP requires for its
131 meter changers is just under 80 hours, which includes training for electric meters
132 *and gas meters*. Because the work to be performed during the AMR deployment
133 encompasses fewer tasks and is of a more limited scope than ordinarily performed
134 by a meter changer, the Ameren Companies are confident that 40 hours of initial
135 training is sufficient.

136 **Q. Have the Ameren Companies discussed the AMR project with Staff?**

137 A. Yes. Ameren representatives, including myself, met with selected Staff members
138 on October 26, 2005. In that meeting Staff urged us to include a provision in the
139 services agreement with Cellnet requiring compliance with the Administrative
140 Code Part 410, "Standards of Service For Electric Utilities."

141 **Q. Did Ameren include such a provision in its services agreement?**

142 A. Yes.

DISCUSSION REGARDING PART 460

144 **Q. Each of the IBEW witnesses claims that Administrative Code Part 460, not**
145 **Part 410, applies to the work of Cellnet and Terasen and, therefore, these**
146 **contractors must become certified as Meter Service Providers ("MSPs"). Do**
147 **you agree?**

148 A. I do not agree. First, as I just testified, Staff has expressed the view that Part 410
149 applies; no mention was made of Part 460 at our October 2005 meeting. Second,
150 though I am not attorney and I am not offering a legal opinion, the plain language
151 of the regulation excludes utilities. Part 460.20 ("Application") specifically
152 states: "This Part shall not apply to...any electric utility's operation within the
153 utility's service territory." Cellnet and Terasen are not subject to certification
154 under Part 460 because they will be performing work on behalf of the Ameren
155 Companies, and not on their own behalf as Meter Service Providers (MSPs).
156 Frankly, this is not an unusual circumstance. There are other aspects involving
157 the provision of meter services where from time to time Ameren uses other
158 vendors or third parties.

159 **Q. Does Part 460 preclude service or technology companies from performing**
160 **selected meter work on behalf of Illinois utilities in their service territories?**

161 A. I have read and am familiar with Part 460 and have found nothing in the
162 regulation that makes any such prohibition.

163 **Q. Do the Ameren Companies already have service or technology companies**
164 **performing selected meter work on their behalf?**

165 A. Yes. J. F. Electric and Terasen currently provide meter reading services on behalf
166 of the Ameren Companies. J. F. Electric personnel set, remove, and replace
167 electric meters. Neither of these entities are certified as MSPs to perform these
168 limited functions, nor to my knowledge has the Commission ever said that they
169 need to be.

170 **Q. Do the Ameren Companies currently utilize automated systems?**

171 A. Yes. The AmerenCIPS areas of Alton and East St. Louis (formerly AmerenUE)
172 have utilized a Cellnet AMR system for several years. Cellnet's system provides
173 automated meter reading services, but Cellnet is not registered as an MSP, and to
174 my knowledge no one has ever suggested that it need be. In a number of cases the
175 Ameren Companies teleport meter consumption data from the meter to an
176 Ameren central server, even though the Ameren Companies do not own or
177 maintain the phone lines. The telephone companies, to my knowledge, are not
178 MSPs, and I am not aware of anyone claiming that they need to be.

179 **Q. The IBEW witnesses claim that the proposed meter service tariffs for the**
180 **respective Ameren Companies are in part "false" (Miller Lines 261-288,**
181 **Moore Lines 236-263, and Peterson Lines 291-318). Do you agree?**

182 A. Not at all. The cited text states that the Ameren Companies will “own, furnish,
183 install...and maintain all Company meters and all associated equipment used for
184 retail billing and settlement purposes in its service area” (Miller Lines 264-266,
185 Moore Lines 239-241, and Peterson Lines 294-296). The Ameren Companies
186 will in fact continue to own, furnish, install and maintain all the electric meters.
187 The “associated equipment” referenced in this text includes parts of the metering
188 circuits that affect the metering functions, such as current transformers, potential
189 transformers, and connected wiring. These devices are the associated equipment
190 that affect the functions of the electric meter used for retail billing and settlement
191 purposes, specifically, measuring electric energy consumption accurately and
192 displaying it on the meter, as required by Part 410. Ameren Companies will
193 continue to own, furnish, install, and maintain this associated equipment.

194 **Q. Are the AMR modules and related communications equipment an integral**
195 **part of the meters or an integral part of electric service?**

196 A. No. This should be obvious from the fact that the Ameren Companies (and their
197 predecessors) have furnished service since the invention of electricity without
198 metering consumption through an AMR system. The AMR modules and related
199 communication network are not necessary to deliver service or to operate the
200 meter. The modules simply allow the meter to be read electronically. The AMR
201 system (modules and network) automatically transmits the progress of the meters
202 but does not affect the basic energy measurement functions or the accuracy of
203 those meters. The Ameren Companies will continue to own the meters and

204 associated metering equipment, and the Ameren Companies are responsible for
205 their accuracy.

206 **CONCLUSION**

207 **Q. The IBEW witnesses recommend that the Commission not approve the**
208 **proposed the Ameren Companies' meter service tariffs as "just and**
209 **reasonable" and furthermore recommend that the Commission require the**
210 **Ameren Companies to use the services of a Commission-certificated MSP or**
211 **bar the Ameren Companies from using Cellnet or Terasen to provide**
212 **metering services until both entities have become certificated under Part 460**
213 **(Miller Lines 449-458, Moore Lines 425-434, and Peterson Lines 494-503).**
214 **Do you agree?**

215 A. No. The IBEW is obviously attempting to interject labor jurisdictional issues into
216 these rate proceedings. None of the IBEW witnesses claim that the Ameren
217 Companies will not perform metering services; that any rate or charge for
218 metering services will be unjust or unreasonable; or that any aspect of the
219 metering tariffs is in any way relevant to whether any costs that the Ameren
220 Companies seek to recover in rates were prudently incurred. Instead, the
221 witnesses claim that the Ameren Companies' proposed metering tariffs are unjust
222 and unreasonable because the companies propose to secure the services of private
223 contractors and oversee those private contractors to do certain limited meter work
224 that the IBEW believes its membership at the utility has the exclusive right to
225 perform. Most notably the IBEW recognizes it will lose meter reading work as a
226 result of automation. The Commission should not discourage automation and the

227 improved customer service benefits that it brings. There is no reasonable
228 argument that the training to be provided for the AMR project is insufficient as
229 compared to comparable work of Ameren Company utility personnel. This whole
230 argument boils down to a labor dispute, and the Commission should deny all
231 IBEW recommendations.

232 **Q. Does this conclude your rebuttal testimony?**

233 A. Yes.

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