

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 06-0179

REBUTTAL TESTIMONY

OF

KIRITKUMAR S. SHAH

SUBMITTED ON BEHALF OF

ILLINOIS POWER COMPANY d/b/a AmerenIP

OCTOBER 16, 2006

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KIRITKUMAR S. SHAH

1 **I. Witness Identification**

2 **Q1. Please state your name and business address.**

3 A. My name is Kiritkumar (Kirit) S. Shah.

4 **Q2. Are you the same Kiritkumar Shah who provided Direct Testimony in this**
5 **proceeding?**

6 A. Yes.

7 **Q3. What is the purpose of your rebuttal testimony?**

8 A. The purpose of my rebuttal testimony is to respond to the Direct Testimony of Staff of the
9 Illinois Commerce Commission ("Staff") and to issues raised by certain Interveners.

10 **Q4. Please summarize the key conclusion of your testimony.**

11 A. The key conclusion of my testimony is that I agree with Mr. Ronald Linkenback's
12 testimony and his conclusion that the Project is needed and it is the least cost alternative.

13 **II. Response to Staff Witness Linkenback**

14 **Q5. With regard to Mr. Linkenback's testimony, pages 7-12, concerning the necessity of**
15 **the transmission project, do you have any comments on his statements?**

16 A. Yes. Mr. Linkenback's testimony on pages 7-12 shows that he has carefully reviewed the
17 evidence provided in my direct testimony and the responses to Staff's data requests and
18 has appropriately concluded that the Project is necessary.

19 **Q6. Do you agree with Mr. Linkenback's conclusion (page 7) that the project is needed to**
20 **provide service?**

21 A. Yes. I agree with Mr. Linkenback's conclusion that the project is needed to provide
22 reliable interconnection service to Prairie State Generating Company.

23 **Q7. With regard to Mr. Linkenback's testimony (pages 27-28) regarding least cost**
24 **alternatives, do you agree with his analysis and conclusion?**

25 A. Yes. I agree with his analysis and conclusion that Plan 6M is the least cost alternative and
26 offers the best design (transmission plan) for the Prairie State Facility.

27 **III. Response to Mr. Sabo**

28 **Q8. Mr. Sabo's testimony, pages 1-2, expresses concern about the export of electricity**
29 **from Prairie State to states outside of Illinois. Do you have any comment on this?**

30 A. Pursuant to Federal Energy Regulatory Commission ("FERC") Order No. 2003, and other
31 tariff requirements, AmerenIP is required to provide nondiscriminatory, standardized
32 generator interconnection service to any generator that requests to connect, and therefore
33 AmerenIP is obligated to supply generator interconnection service to the Prairie State
34 Facility. In order to accommodate the Prairie State Facility, Petitioners have proposed to
35 construct the Transmission Lines. The ultimate purchasers of electricity supplied by the
36 Prairie State Facility does not affect AmerenIP's obligation to supply generator
37 interconnection service to Prairie State.

38 **Q9. Mr. Sabo, along with a number of other Interveners, argues that Ameren should**
39 **have considered using underground line technology for the Transmission Lines.**
40 **What is your response?**

41 The issue of use of "low-impact" transmission enhancements, including underground
42 lines, that Mr. Sabo refers to is also addressed in Ms. Tracy Dencker's testimony.

43 However, I would note that, as described in my Direct Testimony, Ameren considered a
44 large number of planning options and alternatives in determining that the proposed
45 Transmission Lines represented the best option for connecting the Prairie State Facility.
46 With respect to the use of underground lines, from a planning perspective, such
47 technology is cost prohibitive for a project of this type and therefore would not a warrant
48 serious consideration. Underground technology for transmission purposes is still rarely
49 used in the industry. It is only used in areas of high congestion and/or very limited right-
50 of-way availability. Use of underground technologies would remove more agricultural
51 land from production and cause greater impact during construction than an overhead line.
52 Therefore, considering the higher cost and land impact, along with maintenance and
53 operating concerns, underground technologies are not appropriate for a project of this
54 type.

55 **Q10. Does this conclude your rebuttal testimony?**

56 A. Yes, it does.