

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 06-0179

REBUTTAL TESTIMONY

OF

TRACY J. DENCKER

SUBMITTED ON BEHALF

OF

ILLINOIS POWER COMPANY d/b/a AMERENIP

OCTOBER 16, 2006

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6
7 **I. WITNESS IDENTIFICATION AND BACKGROUND**

8 **Q1. Please state your name.**

9 A. Tracy Dencker.

10 **Q2. Are you the same Tracy Dencker who provided Direct Testimony in this**
11 **proceeding?**

12 A. Yes.

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

14 A. The purpose of my rebuttal testimony is to respond to the Direct Testimony of Staff of
15 the Illinois Commerce Commission ("Staff") Witness Ronald Linkenback and to the
16 positions of certain Interveners as they relate to route selection and design issues.

17 **II. RESPONSE TO STAFF**

18 **Q4. With regard to Mr. Linkenback's discussion of the route (pages 13-27), he concludes**
19 **that with the exception of part of the route around the Village of Baldwin, the route**
20 **is reasonable. Do you agree with his assessment?**

21 A. Yes, this is the best route from our route selection report and matrix data.

22 **Q5. With the exception of the route around the Village of Baldwin, do you have any**
23 **comments on his analysis of the preferred route?**

24 A. Yes, Ameren agrees with Mr. Likenback' on the methodology that was used to develop
25 the proposed routes. Prairie South does not require right-of-way acquisition. Prairie
26 West avoids structures within 300 feet, unlike the two southerly alternates. For Baldwin

27 – Rush Island, Ameren considered proximity to dwellings, villages, environmental issues,
28 and geographical limitations.

29 **Q6. Mr. Linkenback recommends (pages 21-22) that for the Baldwin-Rush Line,**
30 **Ameren follow the "Red" alternative route for that portion of the Line from the**
31 **Baldwin Plant switchyard to the Kaskaskia River crossing. Do you agree with his**
32 **recommendation?**

33 A. No. Ameren does not believe Mr. Linkenback's proposed reroute represents the best or
34 most cost-effective route for the Baldwin-Rush Line.

35 **Q7. What was Ameren's rationale for the proposed "Green" route?**

36 A. By routing the "green" route along the western fringes of incorporated Village of
37 Baldwin, Ameren would not be encompassing the community on three sides of town -
38 north, east, and south. Ameren also recognized that the town of Sparta is in the process
39 of constructing two new motels, which are the first motels built in Randolph County in
40 over 20 years, according to the Randolph County Development Department. It appears
41 as though this commercial development is primarily due to the new World Shooting and
42 Recreational Complex. This complex resides approximately 5 miles east of Baldwin and
43 approximately 3 miles north of Sparta, and the "green" route was designed to avoid
44 interfering with this development. This portion of the proposed route is also 2.5 miles
45 shorter than the "brown" route alternative and 3.1 miles shorter than the "red" route
46 alternative, thus equating to \$ 3 to \$ 3.79 million dollars cost difference.

47 **Q8. Mr. Linkenback states (page 20) that Ameren's reasons for proposing the "Green"**
48 **route west of the Village of Baldwin are not sufficient. What is your response?**

49 A. The "green" route 3.1 miles shorter than Mr. Linkenback's proposed "red" route
50 adjustment around the Village of Baldwin. It is Ameren's commitment to find the least
51 cost method of providing service to its customers. This route adjustment would mean
52 approximately \$ 3-3.79 million additional dollars cost for the project. This adjustment
53 would also impact the project schedule, which is customer driven. The cost and
54 construction time would be directly related to the additional mileage.

55 **Q9. Mr. Linkenback states (page 19) that the alternative route reduces the impact on**
56 **dwelling better than the proposed route. What is your response?**

57 A. Although Mr. Linkenback's route may be in proximity to fewer residences, the
58 communities' needs along the entire route can outweigh those of a few individual
59 landowners. The selection of a route must consider the route's overall costs and benefits.

60 **Q10. Mr. Linkenback (page 21) gives a number of reasons why his alternate route is**
61 **superior to the proposed route. Do you agree with his assessment?**

62 A. No. Mr. Linkenback is of the opinion that the World Shooting and Recreational Complex
63 will not bring the amount of commercial business to the area that Ameren feels it will.
64 Potential community growth could also require expansion of the Village's water treatment
65 plant to the east. This is relevant to the Linkenback route adjustment due to the fact that
66 commercial growth would be on the east side of Baldwin, which is the direction of Mr.
67 Linkenback's route adjustment.

68 **Q11. What are the disadvantages of the alternate route Mr. Linkenback is proposing?**

69 A. As Mr. Linkenback states, the disadvantages of the "red" route are increased cost and the
70 additional time required to amend the petition. There would also be increased

71 construction time and additional facilities on the Ameren system that would require
72 maintenance in the future.

73 **Q12. Overall then, does Ameren prefer to keep the "green" route as it currently is**
74 **proposed?**

75 A. Yes. This route has been determined to create the least environmental, residential, and
76 agricultural impacts, at the least cost to Ameren and the customers of Illinois.

77 **Q13. Mr. Linkenback states (page 23) that the route through the area of the Fults**
78 **interveners is reasonable. Do you agree?**

79 A. Yes, the proposed route follows natural terrain contours that assist in traversing towards
80 the river bottoms, while avoiding two dwellings and state preserved land.

81 **Q14. Mr. Linkenback also specifically addresses (pages 25-26) the route in the Prange**
82 **Statement of Position. Do you agree with his conclusions?**

83 A. Yes, Ameren concurs that there are discrepancies with Mr. Prange's numbers.

84 **Q15. Do you have any additional concerns regarding the Prange route?**

85 A. Yes. I discuss the Prange route below.

86 **Q16. Mr. Linkenback also states that Ameren's reasons for rejecting the Red Bud and**
87 **Monroe County routes were reasonable. Do you agree with his assessment?**

88 A. Yes. As stated by Mr. Linkenback, the Red Bud route was approximately 15 miles
89 longer than the proposed route, and it followed along known endangered species habitat,
90 and it is poor engineering design practices to parallel rivers for extended lengths. The
91 Monroe County route has greater environmental and wetlands issues by paralleling Horse
92 Creek.

93

94 **III. RESPONSE TO INTERVENERS**

95 **Q17. Please describe generally how you will respond to the testimony and statements of**
96 **position filed by the Interveners in this case.**

97 A. Many of the Interveners raise similar issues. Therefore, where an issue is presented that
98 is common to a number of Interveners, I will address that issue generally. Where an
99 Intervener has raised individual concerns, I will address those issues on an Intervener-
100 specific basis.

101 **Route Selection**

102 **Q18. Many Interveners assert that the route selection process does not properly account**
103 **for the proposed routes' proximity to residences. Can you describe the methodology**
104 **Petitioners used to select the preferred and alternate routes proposed for the**
105 **Transmission Lines?**

106 A. Ameren performed a comprehensive routing study when developing the proposed routes.
107 The route selection process was described in response to Staff data request RDL 1.29 (see
108 AmerenIP Exhibit 9.01). The proximity of homes and occupied structures within 200
109 feet was rated as a "High Sensitivity" in this process.

110 **Q19. Can you describe in more detail how Petitioners' route selection took into account**
111 **the location of homes and structures?**

112 A. For our project boundary, the area was flown and photographed to produce high
113 resolution digital aerial imagery. This information was georeferenced to the section
114 corners in the public land survey system and added to the Geographic Information
115 Software ("GIS"). Aerial imagery was used to locate and identify buildings within the
116 project area. The building locations data were then refined to identify individual

117 residential structures. Homes were buffered at a distance of 200 feet and assigned a
118 sensitivity level of "high". A "high" sensitivity level was categorized as: areas of high
119 impact potential because of important or valued resources; resources assigned special
120 status; conflict with existing or planned use; and areas posing hazard to construction,
121 operation, or maintenance of the line. For purposes of the refinement of the assumed
122 centerlines, crossing these areas should be avoided, or minimized if complete exclusion is
123 difficult or impossible. Using these criteria, the "Green" route does affect the fewest
124 number of houses, when considering the project is not just from the Baldwin power plant
125 to the Kaskaskia River, but from the Baldwin power plant to the Rush Island power plant.

126 **Q20. Some Interveners also assert that the route selection did not consider social,**
127 **economic, or ecological impacts. Can you describe how Petitioners' route selection**
128 **took into account these factors?**

129 A. Layers of sensitivity were developed to address the potential impacts resulting from the
130 Transmission Lines. More specifically, sensitivity is that measure of probable adverse
131 response of each resource to direct and indirect impacts associated with the proposed
132 Transmission Lines. Overlays of resource sensitivity were used to produce a composite
133 GIS representation illustrating potential constraints and opportunities for alternative
134 transmission line corridors. Areas or features highly sensitive to disturbance from the
135 construction, operation, and maintenance of the transmission line represent the greatest
136 potential constraints or potentially significant changes to the human, natural, or cultural
137 environment. Three levels of sensitivity - high, moderate, and low, were used in GIS
138 representation.

139 **Q21. Certain Interveners also assert that Petitioners only considered cost when selecting**
140 **a route for the Transmission Lines. Is this correct?**

141 A. No, this is not correct. Cost is one factor Ameren considered out of many. Ameren also
142 considered issues such as proximity to residences, towns, major river crossings,
143 agricultural land loss, and effects on natural resources.

144 **Q22. Certain Interveners also express concern that transmission line pole placement will**
145 **interfere with the use of their property, and particularly with farming activities.**
146 **What is your response?**

147 A. Ameren has taken this concern into account with the proposed single pole design. The
148 proposed single pole design will eliminate the 20 plus foot pole spacing between a two-
149 pole "H" structures. The Illinois Department of Agriculture has agreed that our single
150 pole design is optimal. During detailed engineering, every effort will be made to
151 minimize the number of structures in farm fields.

152 **Q23. Certain Interveners have also asserted that routing of the Transmission Lines across**
153 **their fields will interfere with the use of GPS devices for farming. Will Petitioners**
154 **address this concern?**

155 A. Ameren does not feel that the transmission lines will interfere with the operation of GPS
156 equipment. If interference issues arise, Ameren will work with the landowner to mitigate
157 the problem.

158 **Use of Underground Lines**

159 **Q24. Why was underground technology not proposed for the Transmission Lines?**

160 A. This issue is also discussed by Mr. Kirit Shah. However, from a route design point of
161 view, underground technology is estimated to cost 6 to 10 times more than the overhead

162 equivalent. In addition, Ameren does not have the equipment or personnel trained in
163 maintaining or repairing underground transmission. Also, it is not uncommon for repairs
164 to such lines to have to be made at the manufacturer's facilities. This requires removing
165 the failed section and sending it off-site for an extended period of time. The line would
166 thus have an extended outage. As a result, underground lines were not considered a
167 practical alternative.

168 **Karst Topography**

169 **Q25. Certain Interveners express concern about the line route running through karst**
170 **topography. Do you feel these concerns are justified?**

171 A. Karst topography does add some additional design concerns. Ameren has the
172 engineering expertise to construct and maintain transmission lines across Karst
173 topography. Ameren has committed to performing detailed geotechnical studies along
174 the proposed route to identify and avoid karst areas that are unsuitable for line
175 construction, operation, or maintenance. Ameren has on retainer Kelron Environmental
176 and Geotechnology, Inc. for hydrogeologic support. Geotechnology, Inc. would perform
177 the geophysical investigation and exploratory drilling for this project, while Kelron
178 would provide the assessment and potential design considerations and alternatives for
179 mitigating potential groundwater impacts during investigation and construction of said
180 transmission line.

181 **Response to Dynegy Witness Gregory Mason**

182 **Q26. Dynegy Witness Mason (pages 4-5) expresses concern that Ameren's proposed route**
183 **through the Baldwin Plant will place adverse constraints on the operations at the**
184 **Baldwin Plant and recommends certain changes. What is your response?**

185 A. Ameren met with Dynegy plant personnel on July 12, 2006 to discuss this matter. It is
186 my understanding that Ameren has alleviated Dynegy's concerns by routing the line on
187 the east side of the drainage ditch where the line would head in a southwardly direction
188 out of the plant. The line would also parallel the existing pole line on Dynegy property.
189 By having the proposed line on the east side of the drainage ditch, Dynegy could use the
190 area on the west side of the ditch for material laydown.

191 **Response to IBEW**

192 **Q27. IBEW Witness Daniel Miller (page 5) states that Ameren has not provided any**
193 **information regarding personnel who will actually construct the transmission lines.**
194 **Is such information available?**

195 A. The construction of the line will be performed by one or more of Ameren's alliance
196 contractors. The specific contractor who will perform the work has not yet been
197 identified. Personnel employed by the alliance contractor(s) selected will be fully
198 competent to perform this work.

199 **Q28. Mr. Miller says that it is incumbent on Ameren to disclose to the Commission who**
200 **will construct the transmission lines and describe their qualifications. Do you agree**
201 **with this statement?**

202 A. The alliance contractors currently under contract with Ameren have up to 30+ years of
203 experience working on similar projects through out the Ameren system. They are fully
204 qualified to perform this work.

205 **Q29. Do you have any other comments on Mr. Miller's testimony?**

206 A. Due to the uncertainty of the upcoming Ameren construction workload and the lack of
207 specific information regarding the exact timing of the construction schedule for this

208 project, it is not possible to provide the name of the specific contractor(s) that will
209 construct this project.

210 **Response to Baldwin Intervenors**

211 **Q30. Have you reviewed the testimony of the Baldwin Intervenors?**

212 A. Yes.

213 **Q31. Do they express general concerns about the route?**

214 A. Yes. The majority of their concerns are the location to the proposed route in proximity to
215 residences, declining property values, and direction of community growth in Baldwin.

216 **Q32. What is your response to their concerns?**

217 A. Very few residences are in close proximity to the proposed line. There are three
218 residences that reside within 200 feet of the proposed transmission centerline. There are
219 two additional residences that reside within 200 - 300 feet of the proposed transmission
220 centerline. With respect to community impacts, Ameren has 345kV transmission lines,
221 such as the Baldwin – Stallings Line # 4531, which traverse through communities such as
222 Maryville Illinois, and Ameren does not feel that transmission lines prevent community
223 growth. A transmission line is not like a vertical wall that inhibits development.
224 Buildings and structures may be constructed adjacent to the power line right-of-way, just
225 not within the right-of-way. Mr. Geoff Jones' rebuttal testimony addresses property
226 values.

227 **Q33. Several Intervenors have asserted that Ameren's selection of the route to the west of**
228 **the Village of Baldwin considered only the relative cost of the proposed alternatives**
229 **and did not take into account such factors as proximity to residences. How do you**
230 **respond?**

231 A. As I discussed above, Ameren did consider the proximity of residences. Ameren also
232 considered comments from our December 7, 2005 informational workshop on
233 encompassing the community of Baldwin on three sides of the town.

234 **Q34. Several Interveners also assert that the Village of Baldwin's development is to the**
235 **west and not the east, and therefore there is no basis for trying to route the**
236 **transmission lines on the west side of Baldwin. What is your understanding of**
237 **Baldwin's concerns about development to the east of the Village?**

238 A. The direct community benefits of the World Shooting and Recreational Complex have
239 not been fully derived yet, due to the recent opening of the complex in July 2006.
240 However, in data response RDL 1.1, Mr. Schoenbeck, replying for the Village of
241 Baldwin, states that there is a possibility that AmerenIP's proposed transmission route(s)
242 to the east of the Village could possibly conflict with future expansion of the Village's
243 water treatment facility located to the southeast of the Village. As stated in data response
244 RDL 1.6, sewer service is not available at this time for population growth towards the
245 Kaskaskia River.

246 **Response to Fults Interveners**

247 **Q35. Have you reviewed the testimony of the Fults Interveners?**

248 A. Yes. Their general concerns are: proximity to homes, karst topography, erosion, the US
249 Government CRP Forestry Program, pole placement, and future irrigation systems

250 **Q36. What is your response to their concerns?**

251 A. I addressed the issue of the routes' proximity to homes and karst topography above. With
252 regard to soil erosion, Ameren will follow the recommendations of the county Soil and
253 Water Conservation District if the landowner does not suggest a reasonable erosion

254 control method or does not suggest a method of erosion control. In addition, as discussed
255 in the rebuttal testimony of Geoff Jones, Ameren has worked with CRP Programs in the
256 past and will compensate the property owner as appropriate. Finally, Ameren will work
257 directly with Mr. Hartman and Mr. Obernagel to avoid conflict with their proposed
258 irrigation system.

259 **Response to Prange Statement of Position**

260 **Q37. Have you reviewed Mr. Prange's statement of position?**

261 A. Yes.

262 **Q38. What route does he recommend?**

263 A. Mr. Prange's route (the "Black" route) is generally similar to the Monroe County route.
264 His route addresses the portion of the proposed line between the Kaskaskia and
265 Mississippi Rivers. This route is a hybrid of the brown and red routes, with a connector
266 between the two.

267 **Q39. What is his rationale for selecting this route?**

268 A. His rationale for selecting this route is to reduce the line's proximity to homes, the Fults
269 Hill Prairie Preserve, and to the cemeteries near the community of Fults. His claims also
270 briefly address Karst topography and the spread of invasive species on cleared right-of-
271 way.

272 **Q40. Have you investigated the route Mr. Prange proposed?**

273 A. Yes. Mr. Prange states that he understands that the "put it in his yard, not in mine"
274 argument solves nothing and accomplishes less. However, it appears that Mr. Prange's
275 alignment does exactly that. Mr. Prange is a resident of Fults and his proposed alignment
276 is completely removed from the proximity of the town. Mr. Prange has chosen to

277 examine the proposed transmission line's proximity to homes using one eighth and one
278 quarter mile measurements. Ameren cannot reproduce Mr. Prange's results. This is due,
279 at least in part, to his inaccurate representations of Ameren's route alignments. Therefore,
280 Ameren questions whether the Black route really would be in proximity to fewer
281 residences.

282 With respect to the proximity of the proposed line to Fults Hill Nature Preserve,
283 Ameren has had extensive negotiations with the Illinois Department of Natural Resources
284 and the Illinois Nature Preserve Commission. These negotiations established the
285 proposed route, which results in acceptable impacts to both parties. Ameren understands
286 that invasive and exotic species can be an issue with cleared right-of-ways, and are
287 working with the above two agencies. Ameren's proposed alignment would not cross the
288 St. John's Cemetery property or property associated with the cemetery. Lastly, Ameren is
289 well aware of the Karst topography in the project area. Many infrastructure types,
290 including residential development, exist in Karst areas. Ameren has committed to
291 performing detailed geotechnical studies along the proposed route to identify and avoid
292 karst areas that are unsuitable for line construction, operation, or maintenance.

293 **Q41. Does AmerenIP endorse the Black route?**

294 A. No. AmerenIP does not support the Black route. AmerenIP does not believe the Black
295 route offers a better alternative to any of Ameren's proposed routes.

296 **Q42. What is the reaction of the landowners who would be affected by Mr. Prange's**
297 **"Black" route?**

298 A. Their reaction is varied. However, several Interveners whose property would be affected
299 by the Black Route, including Interveners Richard and Eugene Stadter, Martha Church,

300 Margarette Schrader, Thomas and Annette Steibel and Anthony and Rachel Steibel, have
301 expressed opposition to the route, often for many of the same reasons as other Interveners
302 have expressed opposition to the preferred "Green" route or other route options. For
303 example, these Interveners express concern with impacts to property values, impacts to
304 woodland and other natural features, routing through karst terrain, and proximity to
305 residences. Thus I question whether selecting the Black route would eliminate the types
306 of concerns expressed by various Interveners, or simply transfer those concerns from one
307 set of Interveners to another.

308 **Response to Mr. Sabo**

309 **Q43. Mr. Sabo is concerned (pages 4-5) that Ameren did not use a "weighted GIS-based**
310 **corridor siting methodology" for the transmission lines. What is your response?**

311 A. This statement is not correct. Ameren used "weighted GIS-based corridor siting
312 methodology" for transmission line route selection. This information was provided in
313 staff data request RDL 1.29. (See AmerenIP Ex. 9.01.)

314 **Q44. Mr. Sabo also asserts (page 7) that Exhibit 3.4 is incorrect with respect to the route**
315 **near Lehr Road. Is his assertion correct?**

316 A. The Exhibit 3.4 which Mr. Sabo attaches was not generated by Ameren. It is apparent
317 that Mr. Sabo has imposed AmerenIP Exhibit 3.4 from prefiled testimony onto an aerial
318 plan view of property in Washington and St. Clair counties. AmerenIP Exhibit 3.4 does
319 not indicate a scale factor for distance in the "Legend." Moreover, the purpose of this
320 exhibit is to show the general location of utilities within our proposed corridor, and assist
321 in their notification.

322 **Q45. Mr. Sabo's testimony, page 5, expresses concern about the route crossing a coal**
323 **mine abandoned in 1966 by Midland Electric Coal Corp page What is your response?**

324 A. Ameren has the engineering expertise to construct and maintain transmission lines across
325 abandoned coal mines.

326 **Q46. Mr. Sabo, pages 7-8, asserts that Ameren has not ensured compliance with certain**
327 **noise pollution laws. Is this correct?**

328 A. No. Petitioners will construct and operate the Transmission Lines in accordance with all
329 applicable regulatory requirements, including any regulatory requirements related to
330 noise. Mr. Sabo has offered no evidence that the Transmission Lines would not comply
331 with the requirements of 35 Illinois Admin. Code Parts 900 or 901, to the extent
332 applicable, or any other applicable requirement relating to noise.

333 **Q47. Mr. Sabo testimony (page 2), recommends using underground line technology to**
334 **construct the transmission lines. Do you have any comments on this technology?**

335 A. The underground line technology which Mr. Sabo discussed in his testimony, as
336 presented by TransEnergieUS, is based on DC (direct current), not AC (alternating
337 current) technology. I performed a search on the Cross Sound Cable project that is
338 mentioned in Mr. Sabo's exhibit from TransEnergieUS. The installation was in the
339 northeast, and the project had a DC power design to control the flow of power, making it
340 possible to operate the transmission line more like a toll road. Ameren is not trying to
341 limit power flow through the proposed new lines. DC voltages also require AC – to – DC
342 converter stations at both ends of termination. The AC – to – DC converter stations
343 required at the termination points are not only expensive, but also large. Ameren is

344 attempting minimize our Baldwin switchyard expansion as not to impose on Dynergy's
345 facility operations. Large converter end equipment would not assist in this objective.

346 **Q48. Mr. Sabo stated (pages 5-6) that Ameren failed to consider certain low-impact**
347 **transmission enhancements. What is your response?**

348 A. One possible low-impact that Mr. Sabo is referencing is to make more intensive use
349 of existing electrical rights-of-ways. This would imply building the new Prairie West
350 line on the existing rights-of-way corridor of Ameren's Baldwin – Mt. Vernon 345kV
351 line. This existing rights-of-way corridor is not wide enough for three 345kV
352 transmission lines, one existing and the proposed double circuit new line. This type
353 of construction, three circuits side by side, would also increase the potential damage
354 and outage time in the event of a natural disaster such as a tornado. During
355 construction and/or maintenance there would not be adequate clearances between line
356 circuits to work safely without line outages, which are becoming increasingly more
357 difficult to arrange in today's electrical market.

358 The second possible low-impact that Mr. Sabo is referencing is underground
359 lines. This issue is addressed above and in the testimony of Mr. Shah.

360 The third possible low-impact that Mr. Sabo is referencing is work within a
361 substation, which is addressed in Mr. Shah's testimony regarding the need for the
362 project. Minor substation work is not a substitute for the project.

363 **Response to Phegley**

364 **Q49. The Phegleys' state that (pages 3-4) that there has been almost no new development**
365 **to the east of Baldwin and most of the development has been to the west. Do you**
366 **agree with this assessment?**

367 A. The Phegley's statement may be true historically. However, the World Shooting and
368 Recreational Complex recently opened east of Baldwin in July 2006.

369 **Q50. Mr. and Mrs. Phegley state (page 2) that the map showing the location of their home**
370 **is wrong. Is this correct?**

371 A. I do not know what map the Phegley's are referring to. Ameren has provided an
372 easement exhibit to the Phegley's which was developed from an aerial survey that was
373 taken in March of 2005. More recent high resolution aerial photography, required for
374 detailed terrain modeling was taken in January of 2006. The 2006 data agrees with the
375 2005 original information. From this information, the Phegley's home would be
376 approximately 650 feet away from the proposed centerline of the transmission line.

377 **Response to Kloepper**

378 **Q51. Baldwin Intervener Kloepper states (pages 3-4) that your testimony refers to a route**
379 **selection criteria whereby Ameren tried to avoid being less than 1.5 miles from an**
380 **incorporated area, but the route crosses the incorporated area of Baldwin. How do**
381 **you respond to her concerns?**

382 A. Ameren could not avoid locating possible routes less than 1.5 miles from the incorporated
383 community of Baldwin without significant financial impacts. Ameren did, however,
384 adjust our proposed route to avoid "boxing in" Baldwin along three sides of the
385 community.

386 **Response to Liefer**

387 **Q52. Intervener Liefer (pages 5-6) states that the Village of Baldwin in a Resolution dated**
388 **February 21, 2006 wanted to protect both its eastern and western borders, not just**
389 **the eastern. Do you agree?**

390 A. The Village of Baldwin prefers to have the route be placed to the north. The response to
391 Staff data request RDL 1.44, attached as AmerenIP Exhibit 9.02, addresses why the
392 proposed new transmission line does not follow north, away from the town of Baldwin.

393 **Response to Seboldt**

394 **Q53. The Seboldts (pages 1-12, paras. 1-4) recommend the route proposed by Mr. Prange**
395 **and suggest that by moving the route south, the line would traverse a river bottom**
396 **area where the population is more sparse and would avoid an area of dense karst**
397 **topography. What is your response?**

398 A. Moving the proposed line south will not avoid the karst topography, as shown on data
399 response RDL 1.50(b)'s map of karst areas (attached as AmerenIP Exhibit 9.03). Moving
400 the line south to have additional line exposure in the river bottom area is also poor design
401 practices.

402 **Q54. The Seboldts (page 3 para. 1, 3, 4) express concern about storm water runoff**
403 **impacting their land and topsoil, the building of permanent roads, and the**
404 **placement of poles in their fields. How do you respond to these concerns?**

405 A. Detailed design work is not complete. However, Ameren will follow the
406 recommendations of the county Soil and Water Conservation District if the landowner
407 does not suggest a reasonable erosion control. Ameren may have to build temporary
408 roads, but not permanent roads. Ameren will remove temporary roads unless the
409 landowner prefers the road to remain. Ameren will make every effort to minimize the
410 number of poles located in fields. Ameren welcomes information provided by the
411 landowner where structure placement would be crucial to farming activities.

412 **Q55. Will Ameren make an effort to preserve land and topsoil during construction?**

413 A. Ameren's agreement with the Illinois Department of Agriculture, Section 8 Repair of
414 Damaged Soil Conservation Practices states: "If the company is responsible for repairing
415 any damaged soil conservation practices, the repairs will be made in accordance with the
416 specification of the county Soil and Water Conservation Districts (unless the landowner
417 and the Company agree to other repair specifications)."

418 **Response to Pigg**

419 **Q56. The Piggs state that although they do not know the line's exact location, it will be in**
420 **"close proximity" to their residence. Is this correct?**

421 A. The proposed transmission centerline will be approximately 650 feet away from the
422 Pigg's residence.

423 **Response to Vogt**

424 **Q57. The Vogt's specifically recommend (para. 5) that the line be moved a few hundred**
425 **feet to the west. What is your response?**

426 A. The proposed transmission centerline will be approximately 500 feet away from the
427 Vogt's residence. By adjusting the line west the proposed line would be moving closer to
428 the Pigg residence. The proposed centerline alignment has an angle point in this vicinity.
429 Major line adjustments would be difficult. The proposed 150 foot right-of-way corridor
430 will not eliminate the tree wind block that the Vogts mention to the north and west side of
431 their property. The proposed transmission line crosses the southern tip of the Vogt's
432 property, and maintains a tree buffer to the homestead.

433 **Q58. The Vogt's also recommend the Brown route along the river bottoms. What is your**
434 **response?**

435 A. The proposed Brown route would not eliminate the centerline concerns that Mr. Vogt
436 expresses due to the fact that it would still touch the southern tip of the Vogt property.
437 Mr. Vogt's reference to river bottoms is along the Prange Black route. Moving the line
438 south to have additional line exposure in the river bottom area is poor design practices.

439 **Response to Guebert**

440 **Q59. Can you comment on the "Blue" route proposed by Intervener Jeffrey Guebert in**
441 **his Statement of Position?**

442 A. Yes. One general comment on the "blue" route is that it does not alleviate the concerns
443 of the Village of Baldwin as the proposed route crosses through the incorporated area of
444 their community. From an engineering prospective, the angle point in T4S R7W S22
445 falls in a swale in the middle of cultivation. Placing an angle structure at this location
446 could affect field drainage. Just south of the third angle point near the Kaskaskia River,
447 this proposed route would cross over the top of structures/buildings on Mr. Ratz's
448 property. These would require removal. Two of the three additional angle point
449 locations that this route depicts all fall in areas that appear to be in close proximity to a
450 water source and would require additional foundation design. For the above reasons, this
451 route is not a preferred route.

452 **Response to Fulton**

453 **Q60. Intervener Leo Fulton asserts (page 2, para. 7) that the preferred route in Randolph**
454 **County affects substantially more properties and residences than reasonable**
455 **alternatives. Is this correct?**

456 A. The primary route in Randolph County affects 1 additional residence compared to the
457 two proposed alternates.

458 **Q61. Mr. Fulton also states that Petitioners' documents do not note the unincorporated**
459 **town of Prairie. What is your response?**

460 A. That is correct. There are many small communities that are not listed on AmerenIP
461 Exhibits 6.1 and 6.2. Examples of this are the communities of Kidd and Ames in Monroe
462 County. However, the residences in those communities would have been considered
463 under the route siting methodology I discuss above.

464 **Q62. Mr. Fulton states (page 3,¶ 8) states "visual inspection reveals that over 75**
465 **residences lie within 450 yards of the primary route, between the Kaskaskia River**
466 **and the Randolph-Monroe County line." How do you respond?**

467 A. The transmission line corridors were routed to minimize impact on communities. As
468 previously stated, homes were buffered at a distance of 200 feet and assigned a sensitivity
469 level of "high" in our GIS routing study. For purposes of the refinement of the assumed
470 centerlines, crossing high sensitivity areas should be avoided or minimized if complete
471 exclusion is difficult or impossible. A distance of 1350 feet was not considered a
472 reasonable criteria for a buffering distance from homes or structures.

473 **Q63. Mr. Fulton states (page 4,¶ 11) states "The proposed routing does not take**
474 **advantage of the limited developability, lower elevation and level ground**
475 **surrounding the intersection of Illinois Route 3 and Horse Creek." How do you**
476 **respond?**

477 A. From the description Mr. Fulton mentions of this area, Horse Creek must flood and/or
478 backup in this location. Thus this would not be a location that residential or commercial
479 buildings could develop on. Areas prone to flooding can pose challenges to transmission

480 line structures and foundations due to pressure of water flow, debris buildup, and
481 scouring of the soil overburden weakening the foundations.

482 **Q64. Mr. Fulton states (page 4,¶ 13) states "Petitioners incorrectly state that the primary**
483 **route bisects the distance between the incorporated boundaries of Red Bud and**
484 **Ruma." How do you respond?**

485 A. From page 5 of the April 12, 2006 document provided to Ameren's Mr. John Barud by
486 Red Bud, it appears that the southern corporate boundary of the community is the north ¼
487 section of Section 16, T4S R8W. This document was filed with the ICC from Red Bud,
488 and is on the ICC website. Ameren's proposed transmission line traverses in an east-west
489 direction along the southern ¼ section line of Section 21, T4S R8W. The proposed
490 route is not exactly ½ the distance between the communities of Red Bud and Ruma,
491 however Ameren considered issues such as proximity to residences, towns, major river
492 crossings, agricultural land loss, and effects on natural resources when performing our
493 routing study.

494 **Q65. Mr. Fulton states (page 5,¶ 17) states "The primary route fails to maximize the use**
495 **of the natural boundary between the communities of Red Bud and Ruma: the valley**
496 **surrounding Horse Creek." How do you respond?**

497 A. The majority of this natural boundary that Mr. Fulton describes is forested area that may
498 be associated with drainage into Horse Creek. Areas prone to flooding can pose
499 challenges to transmission line structures and foundations due to pressure of water flow,
500 debris buildup, and scouring of the soil overburden weakening the foundations. Also
501 taken into consideration is the potential for cultural resource occurrences which are
502 strongly correlated with proximity to reliable water sources such as Horse Creek.

503 **Q66. Mr. Fulton states (page 6, ¶ 18) states "The current primary route represents an**
504 **unnecessary risk of interfering with highly desirable, unsubsidized, economic**
505 **growth and development in the Red Bud area." How do you respond?**

506 A. As stated above, Ameren does not feel that transmission lines prevent community growth.
507 Buildings and structures may be constructed adjacent to the power line right-of-way, just
508 not within the right-of-way.

509 **Q67. Mr. Fulton's statement, page 2, ¶ 5, suggests that Ameren's decision to provide a**
510 **buffer around IDNR property amounts to a concession that the Transmission Lines**
511 **will have an adverse impact on the surrounding area. Do you agree?**

512 A. No. As explained in my Supplemental Direct Testimony (AmerenIP Ex. 6.0), the route
513 was changed to respond to specific concerns raised by the Illinois Nature Preserves
514 Commission), an entity of the Illinois Department of Natural Resources, regarding
515 present and future interests in the Fults Hill Prairie Nature Preserve in the bluff area near
516 Fults. As a designated nature preserve, the Fults Hill Prairie Nature Preserve is a
517 sensitive site requiring additional consideration in the routing process. However, the
518 changing of the route around such a particularly sensitive area does not amount to a
519 concession that the Transmission Line routes in general have an adverse impact.

520 **Q68. Does this conclude your rebuttal testimony?**

521 A. Yes.