

**ILLINOIS COMMERCE COMMISSION**

**DOCKET NO. 07-\_\_\_\_\_**

**DIRECT TESTIMONY**

**OF**

**KENNETH W. LYNN**

**SUBMITTED ON BEHALF**

**OF**

**CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS**

**OCTOBER 2007**

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**I. INTRODUCTION AND WITNESS QUALIFICATIONS**

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**Q1. Please state your name, business address and present position.**

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A. Kenneth W. Lynn, 1901 Chouteau, St. Louis, MO, 63103. I am employed by Ameren Services Company ("Ameren Services") as a Senior Environmental Scientist in the Environmental, Safety and Health ("ES&H") Department. Ameren Services provides technical, financial and other advisory services to Ameren Corporation's ("Ameren") subsidiaries, including Central Illinois Public Service Company d/b/a AmerenCIPS ("AmerenCIPS").

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**Q2. Please summarize your educational background and professional experience.**

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A. I received a Bachelor of Science degree in Biology from Southern Illinois University-Edwardsville in 1982. I received a Master of Science degree in Biology from the Southern Illinois University-Edwardsville in 1988. I began my employment with then Union Electric Company in 1985 in the Environmental Services Department.

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**Q3. What are your duties and responsibilities in your present position?**

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A. My duties primarily include development and implementation of environmental compliance strategies for Ameren operations as they relate to existing and proposed projects. Examples would be the preparation of appropriate documentation identifying potential impacts to designated state natural areas regulated by the Illinois Nature Preserves Commission ("INPC"), endangered or

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22 threatened species impacts jointly regulated by the Illinois Department of Natural  
23 Resources ("IDNR") and the United States Fish & Wildlife Service ("USFWS"),  
24 wetlands impacts regulated by the U.S. Army Corps of Engineers (USACE"), and  
25 state cultural resources regulated through the Illinois Historic Preservation  
26 Agency ("IHPA").

## 27 **II. PURPOSE AND SCOPE**

28 **Q4. Are you familiar with the Petition filed by AmerenCIPS in this proceeding?**

29 A. Yes. It is my understanding that the project proposed by AmerenCIPS  
30 ("Petitioner") in the Petition may involve potential impacts to the environment.

31 **Q5. What is the purpose of your testimony in support of this Petition?**

32 A. The purpose of my testimony is to provide an overview regarding applicable  
33 environmental and historical regulatory requirements associated with this project.

## 34 **III. ENVIRONMENTAL ACTIVITIES**

35 **Q6. What responsibilities does ES&H have in connection with locating a new  
36 transmission line like this one?**

37 A. ES&H evaluates the project for potential impact(s) and environmental permitting  
38 issues so that the project engineer can then make an informed decision in  
39 choosing the final construction route and address the selected route's  
40 environmental issues.

41 **Q7. Did AmerenCIPS evaluate the environmental impacts of the proposed line?**

42 A. Yes. Several alternative routes were developed, utilizing criteria based on  
43 existing site features, such as wetlands, roadways, buildings, and infrastructure.  
44 Environmental considerations were one factor utilized in selecting the preferred  
45 route. With regard to environmental considerations related to route selection,  
46 AmerenCIPS retained a consultant, Natural Resources Consulting ("NRC"), to

47 assist in developing data related to environmental considerations, analyzing  
48 environmental impacts, and coordinating consultations and permitting with state  
49 and federal regulatory agencies. This analysis and coordination is discussed in  
50 more detail in the testimony of Mr. Tom Girman (AmerenCIPS Exhibit 5.0).  
51 Retaining a consultant to provide technical expertise and assistance for projects  
52 like these is common business practice for AmerenCIPS.

53 **Q8. Has AmerenCIPS consulted with the appropriate state and federal agencies**  
54 **regarding the environmental and historical aspects of the project?**

55 A. Yes. As described by Mr. Girman, AmerenCIPS has consulted with Illinois  
56 Department of Natural Resources, US Fish and Wildlife Service, the Illinois  
57 Historic Preservation Agency, the U.S. Army Corps of Engineers (USACE), U.S.  
58 Environmental Protection Agency (USEPA) Region 5, and Illinois Environmental  
59 Protection Agency (IEPA). AmerenCIPS is working with these agencies to  
60 address the issues of concern for them.

61 **Q9. Will AmerenCIPS comply with the applicable rules and permitting**  
62 **requirements of the agencies listed above ?**

63 A. Yes. AmerenCIPS will comply with all applicable rules and permitting  
64 requirements of these agencies. In addition, AmerenCIPS will work closely with  
65 these agencies to ensure all their or historical resources concerns are addressed as  
66 appropriate.

67 **Q10. Does this conclude your prepared direct testimony?**

68 A. Yes, it does.