

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 08-_____

DIRECT TESTIMONY

OF

TRACY J. DENCKER

SUBMITTED ON BEHALF OF

ILLINOIS POWER COMPANY, d/b/a AmerenIP

July 23, 2008

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I. INTRODUCTION AND WITNESS QUALIFICATIONS

Q1. Please state your name, address and position with Ameren Services Company (“Ameren Services”).

A. My name is Tracy J. Dencker. My business address is 1901 Chouteau Avenue, St. Louis, Missouri. I am a project engineer in Transmission Line Design for Ameren Services Company (“Ameren Services”) responsible for designing the new line described herein. Ameren Services provides various services to Illinois Power Company d/b/a AmerenIP (“AmerenIP”) and Ameren Illinois Transmission Company (“AITC”, together with AmerenIP, “Petitioners”). Prior to the merger of CIPSCO, Inc. and Union Electric Company, I was employed by Central Illinois Public Service Company.

Q2. How long have you been so employed?

A. I have been employed 16 years, first with AmerenCIPS, and now Ameren Services.

Q3. Will you state briefly your training and experience for the position you now hold?

A. I have a Bachelor degree in Electrical Engineering from the University of Missouri-Rolla. I have also attended industry-related seminars. I have 16 years of utility engineering experience, mostly as a transmission line design engineer for Ameren Services. I am currently an alternate member of the EEI

22 NESC/Electric Utilities Representatives Coordinating Task Force Subcommittee
23 4—Overhead Lines, Clearances.

24 **Q4. What are your duties and responsibilities in your present position?**

25 A. My primary responsibilities include project manager of the Prairie States project.
26 This includes managing and directing the consultants providing field and office
27 support for the environmental permitting portion of the project. My engineering
28 duties include line design, structure design, structure placement, and material
29 procurement, along with managing the transmission line portion of the project
30 schedule and budget. My other job duties not related to this project include
31 refining Ameren’s route selection matrix process and developing an Ameren
32 response policy for Electric and Magnetic Field measurements for addressing
33 customer questions and concerns, along with assisting new engineers in the group.

34 **II. PURPOSE AND SCOPE**

35 **Q5. Are you familiar with the Petition filed by AmerenIP and AITC in this
36 proceeding?**

37 A. Yes, Petitioners are requesting eminent domain authority with respect to 87
38 parcels (the “Unsigned Parcels”) to allow them to acquire all needed land rights
39 along the 30-mile transmission line route from AmerenIP’s Baldwin switchyard
40 to the AmerenUE’s Rush Island switchyard (the “Baldwin Rush Line”). The
41 Baldwin Rush Line crosses a total of 116 parcels of private land. It is one of the
42 three transmission line routes (the others being the Prairie South Line and the
43 Prairie West Line¹) approved by the Commission in Docket No. 06-0179.

¹ Petitioners are seeking eminent domain authority with respect to certain parcels on the Prairie West Line in Docket 08-0291.

44 **Q6. What is the purpose of your testimony in support of this Petition?**

45 A. The purpose of my testimony is to provide information regarding the route, design,
46 and schedule of construction of the Baldwin Rush Line. Specifically I explain
47 why it is imperative that the Commission authorize the Petitioners to exercise
48 eminent domain authority with regard to the Baldwin Rush Line. I also discuss
49 Petitioners' construction plan for the Baldwin Rush Line.

50 **III. PROJECT SCHEDULE**

51 **Q7. What is the current status of the Baldwin Rush Line?**

52 A. The design of the Baldwin Rush Line has been completed. The material
53 procurement process began in late May 2008 with the exchange of design
54 documentation for steel poles. The process of obtaining governmental approvals
55 and permits is now underway. Line construction is scheduled to start in March
56 2009.

57 **Q8. Please describe the status of the permits and approvals that you reference.**

58 A. As project manager I am aware that Ameren Services, on behalf of the Petitioners,
59 has received comments dated February 7, 2008, from the Illinois Historic
60 Preservation Agency ("IHPA") in reference to an archaeological Phase I
61 reconnaissance report for the Baldwin Rush Line. As a result of that report,
62 Ameren Services must perform a Phase II Cultural Resources survey on 2
63 parcels; the survey of the first parcel was started on May 22, 2008.

64 Ameren IP also filed a Incidental Take Permit "Conservation Plan" for the
65 Baldwin Rush Line with the Illinois Department of Natural Resources ("IDNR").
66 The public comment period was completed on May 16, 2008. Authorization is
67 expected by the end of July, 2008. Ameren Services retained the services of

68 MACTEC Engineering and Consulting, Inc. to perform pre-construction
69 biological surveying, along with biological monitoring during construction of the
70 transmission lines, including surveying and monitoring that may be required
71 under the proposed Baldwin – Rush Island Incidental Take Permit “Conservation
72 Plan”.

73 Ameren Services also submitted a Joint Application Form for a Section
74 404/10 Individual Permit for the Baldwin – Rush Island Line from the U.S. Army
75 Corp of Engineers (“USACE”) in late April, 2008. Ameren is in the process of
76 responding to the public’s comments.

77 In fulfillment of the Endangered Species Act, Section 7(a)(2) and
78 requirements under Section 404 of the Clean Water Act, Ameren Services has
79 further requested the USACE consult with the U.S. Fish and Wildlife Service
80 (“USFWS”) regarding biological impacts of the transmission line construction.
81 Pursuant to these requirements, Petitioners formally submitted the Prairie State
82 Interconnection Project Biological Assessment (“BA”) (which covers the entire
83 project and all three lines) on March 27, 2008. Petitioners received concurrence
84 on the BA on May 16, 2008.

85 **Q9. What is the current construction schedule for the Baldwin Rush Line?**

86 A. Right-of-way clearing is scheduled to start on November 16, 2008 and continue
87 through March 31, 2009. Foundation construction is also schedule to start on
88 November 16, 2008 in areas where tree clearing is not required. Line
89 construction for the Baldwin Rush Line (placement of towers and actual

90 transmission lines) is scheduled to start in mid-March 2009. The target
91 completion date for the Baldwin Rush Line is October 1, 2010.

92 **Q10. Is this the same as the construction schedule for the Prairie West Line?**

93 A. No. The construction schedule for the Prairie West Line anticipates completion
94 of the line substantially (approximately 10 months) sooner than the Baldwin Rush
95 Line. For this reason, Petitioners filed a petition with the Commission seeking
96 eminent domain authority for certain parcels on the Prairie West Line on May 1,
97 2008. Right-of-way clearing for the Prairie West Line is scheduled to start
98 October 1, 2008 and continue through April 1, 2009 (as discussed below, right of
99 way clearing must take place in fall and winter months to avoid potential impacts
100 on Indiana bat habitat). Foundation construction is also schedule to start on
101 October 1, 2008 in areas where tree clearing is not required. Line construction
102 (placement of towers/poles, insulators, and conductor) is scheduled to start in
103 mid-January, 2009. The target completion date for the Prairie West Line is
104 November 20, 2009.

105 **Q11. What is the construction schedule for the Prairie South Line?**

106 A. The construction schedule for the Prairie South Line is identical to the Prairie
107 West Line, with one exception: the target completion date for the Prairie South
108 Line is October 15, 2009. The various labor and material contracts will be
109 awarded for the Prairie South Line and the Prairie West Line as one project, with
110 two different charge account tasks.

111 **Q12. Would the failure to obtain all necessary easements along the Baldwin Rush**
112 **Line in a timely manner delay the Baldwin Rush Line construction schedule?**

113 A. Yes. If Petitioners are unable to acquire the needed easements, the construction
114 schedule will be delayed. Such a delay could have substantial implications for the
115 successful completion of the Baldwin Rush Line, as well as the completion of the
116 entire transmission line project approved in Docket No. 06-0179. Delay in
117 completing the transmission line would lead to delay in start-up and testing of the
118 generation units of the Prairie State generating plant, which would ultimately lead
119 to delay in full commercial operation of the plant.

120 **Q13. What would be the impact of a delay in the construction schedule of the**
121 **Baldwin Rush Line?**

122 A. Delays in the start of right-of-way clearing would mean a possible six month
123 delay to the project because this route traverses through Indiana bat habitat and
124 hibernacula locations. Federal rules and regulations prohibit tree removal from
125 April 15th through September 15th in Indiana bat habitat and April 1 through
126 November 15th in areas within 5 miles of known Indiana bat hibernacula locations
127 (caves). This could delay the completion of the remaining construction tasks and
128 delay the Baldwin Rush Line's in-service date into March 2011. Also, system
129 outages are not scheduled during the summer peak loading conditions/season of
130 June 1st through September 15th. After September 15th outages may be obtained
131 only when outside temperatures and system load have declined. If delays
132 progress into early 2011, Prairie State and its customers could potentially have to
133 wait additional time before the plant could be at maximum operational capacity,

134 due to the need to complete start-up and testing. (The effects of a delay may be
135 costly: Prairie State has informed Ameren that each month of delays in connecting
136 the plant correlates to approximately \$35 million in lost potential earnings.)
137 Construction delays would also potentially mean an additional season of crop
138 damage, because actual construction of the Baldwin Rush Line is scheduled to
139 begin in the spring of 2009, but if construction carries on into 2011 then
140 construction would affect not only 2010 but also 2011 year's crops. As a result,
141 there is an immediate need for eminent domain authority, as discussed by
142 Petitioners' other witnesses.

143 **Q14. Could delay to the Baldwin Rush Line construction schedule cause delays to**
144 **the construction schedule of Project as a whole?**

145 A. Yes, delays to the Baldwin Rush Line could affect construction labor and
146 equipment available to build the other lines, and so delay the Project as a whole.

147 **IV. ROUTE DESIGN**

148 **Q15. Please provide a general description of Petitioners' process for designing the**
149 **route of the Baldwin Rush Line.**

150 A. In Docket No. 06-0179, the Commission ordered that the Baldwin Rush Line be
151 built on the route shown on Ameren Exhibit 1.1 (attached to Mr. Trelz's
152 testimony in this proceeding). Based on the approved route, the specific route
153 was designed using the following methodology. Methods used for the siting
154 analysis include review of readily available existing data pertaining to land use,
155 biological resources, cultural resources, and water resources. Data sources
156 primarily include the public domain and information available internally at
157 Ameren. Data collection was followed by routing analysis and mapping using

158 criteria established by the planning team. Geographic Information System
159 (“GIS”) software was utilized to map available data and locate areas potentially
160 sensitive to siting the transmission line. Aerial photography was utilized to
161 further validate routing opportunities and constraints. Engineering and
162 environmental specialists conducted field reconnaissance of the project area.
163 Information pertinent to each resource area was then factored into a composite
164 sensitivity analysis to further refine selection of the most feasible route design for
165 the proposed transmission line.

166 **Q16. Does this conclude your prepared direct testimony?**

167 A. Yes.

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