

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 08-_____

REVISED DIRECT TESTIMONY

OF

TRACY J. DENCKER

SUBMITTED ON BEHALF OF

ILLINOIS POWER COMPANY, d/b/a AmerenIP

July 23, 2008 (Rev. January 28, 2009)

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4 I. INTRODUCTION AND WITNESS QUALIFICATIONS

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

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

15 **Q2. How long have you been so employed?**

16 A. I have been employed ~~46~~17 years, first with AmerenCIPS, and now Ameren
17 Services.

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

20 A. I have a Bachelor degree in Electrical Engineering from the University of
21 Missouri-Rolla. I have also attended industry-related seminars. I have ~~46~~17 years
22 of utility engineering experience, mostly as a transmission line design engineer for
23 Ameren Services. I am currently an alternate member of the EEI NESC/Electric

24 Utilities Representatives Coordinating Task Force Subcommittee 4-Overhead
25 Lines, Clearances.

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

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

36 **II. PURPOSE AND SCOPE**

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

39 A. Yes, Petitioners are requesting eminent domain authority with respect to 8738
40 parcels (the “Unsigned Parcels”) to allow them to acquire all needed land rights
41 along the 30-mile transmission line route from AmerenIP’s Baldwin switchyard to
42 the AmerenUE’s Rush Island switchyard (the “Baldwin Rush Line”). The Baldwin
43 Rush Line crosses a total of 116 parcels of private land. It is one of the three
44 transmission line routes (the others being the Prairie South Line and the Prairie
45 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.

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

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

52 **III. PROJECT SCHEDULE**

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

54 A. The design of the Baldwin Rush Line has been completed. The material
55 procurement process began in late May 2008 with the exchange of design
56 documentation for steel poles. The process of obtaining governmental approvals
57 and permits is now underway. Line construction is scheduled to start ~~in~~
58 ~~March~~June 1, 2009.

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

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

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

69 expected by the end of July, 2008. Ameren Services retained the services of
70 MACTEC Engineering and Consulting, Inc. to perform pre-construction biological
71 surveying, along with biological monitoring during construction of the
72 transmission lines, including surveying and monitoring that may be required under
73 the proposed Baldwin - Rush Island Incidental Take Permit "Conservation Plan".

74 Ameren Services also submitted a Joint Application Form for a Section
75 404/10 Individual Permit for the Baldwin - Rush Island Line from the U.S. Army
76 Corp of Engineers ("USACE") in late April, 2008. Ameren ~~is in the process of~~
77 ~~responding~~has responded to the public's comments, and received a provisional
78 permit from the USACE in December 2008.

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

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

88 A. Right-of-way clearing ~~is scheduled to start~~started on November 16~~2008~~January 5,
89 ~~2008~~2009 and will continue through March 31, 2009. Foundation construction is
90 also ~~scheduled~~scheduled to start on November 16~~2008~~February 17, 20082009 in areas
91 where tree clearing is not required. Line construction for the Baldwin Rush Line

92 (placement of towers and actual transmission lines) is scheduled to start in
93 ~~mid-March~~June 1, 2009. The target completion date for the Baldwin Rush Line is
94 October 1, 2010.

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

96 A. No. The construction schedule for the Prairie West Line anticipates completion of
97 the line substantially (approximately 10 months) sooner than the Baldwin Rush
98 Line. For this reason, Petitioners filed a petition with the Commission seeking
99 eminent domain authority for certain parcels on the Prairie West Line on May 1,
100 2008. Right-of-way clearing for the Prairie West Line ~~is scheduled to start~~started
101 October 1, 2008 and will continue through April 1, 2009 (as discussed below, right
102 of way clearing must take place in fall and winter months to avoid potential impacts
103 on Indiana bat habitat). Foundation construction ~~is also schedule to start~~started on
104 October 1, 2008 in areas where tree clearing is not required. Line construction
105 (placement of towers/poles, insulators, and conductor) ~~is scheduled to start in~~
106 ~~mid-January~~started December 29, 20092008. The target completion date for the
107 Prairie West Line is November 20, 2009.

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

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

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

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

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

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

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

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

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

150 **IV. ROUTE DESIGN**

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

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

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

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

169 A. Yes.

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