

ILLINOIS COMMERCE COMMISSION

DOCKET NO. 08-_____

REVISED DIRECT TESTIMONY

OF

TRACY J. DENCKER

SUBMITTED ON BEHALF OF

ILLINOIS POWER COMPANY, d/b/a AmerenIP

May 1, 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 ~~16~~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 ~~16~~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 ~~10~~ **4**
40 parcels (the "Unsigned Parcels") to allow them to acquire needed rights of way
41 along the 7.5 mile transmission line route (the "Prairie West Line") from the Prairie
42 State Facility west to AmerenIP's existing Baldwin-Stallings Line 4531 345 kV
43 transmission line. The Prairie West Line crosses 35 parcels of private land. It is
44 one of the three transmission line routes (the others being the Prairie South Line
45 and the Baldwin-Rush Island Line) approved by the Commission in Docket No.
46 06-0179.

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

48 A. The purpose of my testimony is to provide information regarding the route, design,
49 and schedule of construction of the Prairie West Line. Specifically I explain why it
50 is imperative that the Commission authorize the Petitioners to exercise eminent
51 domain authority with regard to the Prairie West Line. I also discuss Petitioners'
52 construction plan for the 30-mile Baldwin-Rush Island transmission line route.
53 Petitioners have developed the construction schedule such that they can proceed
54 with the Prairie West Line first, and then later or in conjunction therewith, proceed
55 with the Baldwin-Rush Island Line.

56 **III. PROJECT SCHEDULE**

57 **Q7. What is the current status of the Prairie West Line?**

58 A. The design of the Prairie West Line has been completed. Material procurement
59 began with the "Request for Proposal" for steel poles for the transmission line on
60 March 24, 2008. The process of obtaining governmental approvals and permits is
61 now underway. Construction ~~is scheduled to start~~started October 1, 2008.

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

63 A. As project manager I am aware that Ameren Services, on behalf of the Petitioners,
64 has received comments dated January 29, 2008, from the Illinois Historic
65 Preservation Agency ("IHPA") in reference to an archaeological Phase I
66 reconnaissance report conducted by Petitioners as required by Section 106 of the
67 National Historic Preservation Act of 1966, as amended, and its implementing
68 regulations, 36 CFR 800: "Protection of Historic Properties". Pursuant to these
69 comments, a Phase II archaeological submittal letter was sent to IHPA on April 17,

70 2009, with reference to Phase II field surveying on the Prairie State Facility
71 property, site 11WG-149, and for avoidance plans for the potentially eligible
72 historic site 11S-1731 on parcel SC-105, the Marguerite & Albert Grossman
73 property.

74 Ameren Services has also applied for a Nationwide Permit No. 12, Utility
75 Line Discharges, and Nationwide Permit No. 33, Temporary Construction, Access
76 and Dewatering, from the U.S. Army Corp of Engineers (“USACE”) on March 27,
77 2008. **Ameren received authorization May 19, 2008 from USACE.**

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

85 In addition, the Illinois Department of Natural Resources approved Ameren
86 IP’s Incidental Take Permit “Conservation Plan”, which was prepared in
87 accordance with the requirement that state government funded or authorized
88 projects assess whether the projects will impact Illinois listed endangered or
89 threatened species or their habitat. In compliance with the Incidental Take Permit,
90 Ameren Services retained the services of MACTEC Engineering and Consulting,
91 Inc. on April 1, 2008 to perform pre-construction biological surveying, along with
92 biological monitoring during construction.

93 **Q9. What is the current construction schedule for the Prairie West Line?**
94 A. Right-of-Way clearing is ~~scheduled to start~~started October 1, 2008 and will
95 continue through April 1, 2009 (as discussed below, right of way clearing must take
96 place in fall and winter months to avoid potential impacts on Indiana bat habitat).
97 Foundation construction is ~~also schedule to start~~started on October 1, 2008 in areas
98 where tree clearing is not required. Line construction (placement of towers and
99 actual transmission lines) is ~~scheduled to start in mid-January~~started December 29,
100 ~~2009~~2008. The target completion date for the Prairie West Line is November 20,
101 2009.

102 **Q10. What is the status of the Prairie South Line and Baldwin-Rush Island Lines?**

103 A. The Prairie South Line is being constructed in conjunction with the Prairie West
104 Line, and its status is approximately the same as that for the Prairie West Line,
105 discussed above.

106 For the Baldwin - Rush Island Line, as project manager I am aware that
107 Ameren Services, on behalf of the Petitioners, has received comments dated
108 February 7, 2008, from the IHPA in reference to an archaeological Phase I
109 reconnaissance report for the Prairie South Line. Ameren Services also submitted a
110 Joint Application Form for a Section 404 Individual Permit for the Baldwin - Rush
111 Island Line from USACE in late April, 2008. Ameren IP's Incidental Take Permit
112 "Conservation Plan" for the Baldwin - Rush Island Line is in the process of the 30
113 day public comment period, which will expire on May 3, 2008. As discussed above,
114 Ameren Services retained the services of MACTEC Engineering and Consulting,
115 Inc. to perform pre-construction biological surveying, along with biological

116 monitoring during construction of the transmission lines, including surveying and
117 monitoring that may be required under the proposed Baldwin - Rush Island
118 Incidental Take Permit "Conservation Plan".

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

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

125 **Q12. What is the construction schedule for the Baldwin-Rush Island Line?**

126 A. Right-of-way clearing is ~~scheduled to start on November 16, 2008~~ started January 5,
127 2008 ~~2009~~ and will continue through March 31, 2009. Foundation construction is
128 also ~~scheduled~~ scheduled to start on ~~November 16, 2008~~ February 17, 2008 ~~2009~~ in areas
129 where tree clearing is not required. Line construction for the Baldwin-Rush Island
130 Line (placement of towers and actual transmission lines) is scheduled to start ~~in~~
131 ~~mid-March~~ June 1, 2009. The target completion date for the Baldwin - Rush Island
132 Line is October 1, 2010.

133 **Q13. Would the failure to obtain all necessary easements along the Prairie West**
134 **Line in a timely manner delay the Prairie West Line construction schedule?**

135 A. Yes. If Petitioners are unable to acquire the needed easements, the construction
136 schedule will be delayed. Such a delay could have substantial implications for the
137 successful completion of the Prairie West Line, as well as the completion of the
138 entire transmission line project approved in Docket No. 06-0179.

139 **Q14. What would be the impact of a delay in the construction schedule of the**
140 **Prairie West Line?**

141 A. Delays in the start of right-of-way clearing would mean a possible six month delay
142 to the project because this route traverses through Indiana bat habitat, and Federal
143 rules and regulations prohibit tree removal from April 15th through September 15th
144 in the area of this project. The Landowner E parcel, for example, requires
145 extensive tree removal that would be delayed until the fall of 2009 if right of way
146 clearing was delayed past April 15, 2009. This would delay the completion of the
147 remaining construction tasks and delay the Prairie West Line's in-service date into
148 2010. In addition, system outages on the existing Baldwin - Stallings 345kV line,
149 which the Prairie West Line is tying into and which would be necessary to allow
150 interconnection of the lines, would have to be adjusted and approved through the
151 Midwest Independent Transmission System Operator ("MISO") if there is a delay.
152 System outages are not scheduled during the summer peak loading
153 conditions/season of June 1st through September 15th. After September 15th
154 outages may be obtained only when outside temperatures and system load have
155 declined. If delays progress into mid-2010, Prairie State and its customers could
156 potentially have to wait additional time to before the plant could be electrically tied
157 into the transmission system. (The effects of a delay may be costly: Prairie State has
158 informed Ameren that each month of delays in connecting the plant correlates to
159 approximately \$35 million in lost potential earnings.) Construction delays would
160 also potentially mean an additional season of crop damage, because actual
161 construction of the Prairie West Line is scheduled to begin in the spring of 2009,

162 but if construction carries on into 2010 then construction would affect that year's
163 crops also. As a result, there is an immediate need for eminent domain authority, as
164 discussed by Petitioners' other witnesses.

165 **Q15. Could delay to the Prairie West Line construction schedule cause delays to the**
166 **construction schedule of Project as a whole?**

167 A. Yes, delays to the Prairie West Line could affect construction labor and equipment
168 available to build the other lines, and so delay the Project as a whole.

169 **IV. ROUTE DESIGN**

170 **Q16. Please provide a general description of Petitioners' process for designing the**
171 **route of the Prairie West Line.**

172 A. In Docket No. 06-0179, the Commission ordered that the Prairie West Line be built
173 on the route proposed by Petitioners in that case (as shown on Ameren Exhibit 1.1,
174 attached to Mr. Trelz's testimony). Based on the approved route, the specific route
175 was designed using the following methodology. Methods used for the siting
176 analysis include review of readily available existing data pertaining to land use,
177 biological resources, cultural resources, and water resources. Data sources
178 primarily include the public domain and information available internally at Ameren.
179 Data collection was followed by routing analysis and mapping using criteria
180 established by the planning team. Geographic Information System ("GIS")
181 software was utilized to map available data and locate areas potentially sensitive to
182 siting the transmission line. Aerial photography was utilized to further validate
183 routing opportunities and constraints. Engineering and environmental specialists
184 conducted field reconnaissance of the project area. Information pertinent to each

185 resource area was then factored into a composite sensitivity analysis to further
186 refine selection of the most feasible route design for the proposed transmission line.

187 **Q17. Does this conclude your prepared direct testimony?**

188 A. Yes.