

STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

TRI-COUNTY ELECTRIC )  
COOPERATIVE, INC., )  
 )  
Complainant, )  
 )  
vs. ) Case No. 05-0767  
 )  
ILLINOIS POWER COMPANY, d/b/a )  
AMEREN IP, )  
 )  
Respondent. )

Case No. 05-0767

CHIEF CLERK'S OFFICE  
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COMMERCIAL DISTRICT

PREPARED SUPPLEMENTAL REBUTTAL TESTIMONY OF ROBERT C. DEW, JR. P.E.  
IN SUPPORT OF TRI-COUNTY ELECTRIC COOPERATIVE, INC.

- 1 Q: Please state your name.
- 2 A: Robert C. Dew, Jr. P.E.
- 3 Q: Are you the same Robert C. Dew Jr. who has provided Prepared Direct Testimony filed
- 4 September 29, 2009, in this docket and Prepared Rebuttal Testimony filed January 28,
- 5 2010 in this docket?
- 6 A: Yes.
- 7 Q: Have you had an opportunity to review the Supplemental Testimony of Mike W. Tatlock
- 8 filed in support of Illinois Power Company dba AmerenIP as AmerenIP Exhibit 7 and the
- 9 exhibits attached thereto?
- 10 A: Yes.
- 11 Q: Have you also had an opportunity to review the Prepared Direct Testimony of Michael
- 12 Garden of Citation Oil & Gas Corp. filed in support of Illinois Power Company in this

1 docket as Ameren IP Exhibit 10 and the exhibits attached thereto?

2 A: Yes.

3 Q: Have you had an opportunity to review the Prepared Direct Testimony of Josh Kull of  
4 Citation Oil & Gas Corp filed in support of Illinois Power Company in this docket as  
5 Ameren IP Exhibit 11 and the exhibits attached thereto?

6 A: Yes.

7 Q: Have you had an opportunity to review the Prepared Direct Testimony of Robert C. Herr  
8 filed in this docket in support of Illinois Power Company as AmerenIP Exhibit 8 and the  
9 exhibits attached thereto?

10 A: Yes.

11 Q: With reference to the Mike W. Tatlock Supplemental Testimony, does that testimony  
12 consist primarily of two affidavits by Mike W. Tatlock, one affidavit identified as  
13 Respondent Exhibit 7.1 dated April 7, 2008 and one affidavit by Mike W. Tatlock  
14 identified as Respondent Exhibit 7.2 dated June 20, 2008 along with exhibits pertaining  
15 to the building materials for the IP Texas substation identified as AmerenIP Exhibit 1.1,  
16 the Electric Service Contracts between IP and Texaco for the Citation Oil Field and  
17 identified as AmerenIP Exhibit 1.3, the IP line data sheets for the Texas substation and  
18 identified as AmerenIP Exhibit 1.2, the Illinois Power Company Customer Terms and  
19 Conditions for Electric Service Schedule ILL I.C.C. No. 35 and identified as Exhibit E,  
20 documents identified as Illinois Power Company Electric Service Schedule ILL I.C.C.  
21 No. 35 entitled "Standards and Qualifications for Electric Service" and identified as  
22 Exhibit F, a document identified as Illinois Power Company "Rules, Regulations, and  
23 Conditions Applying to Electric Service" ILL I.C.C. No. 10 and identified as Exhibit G,

1 and portions of the Illinois Commerce Commission Administrative Code entitled "Title  
2 83: Public Utilities" Chapter 1, Illinois Commerce Commission, Sub-Chapter C: Electric  
3 Utilities, Part 410 Standards of Service for Electric Utilities and Alternative Retail  
4 Electric Suppliers and consisting of Sections 410.10 entitled "Definitions" and identified  
5 as Exhibit H?

6 A: Yes. The Supplemental Direct Testimony of Mike W. Tatlock consists of those general  
7 exhibits attached thereto. The text of Mr. Tatlock's Supplemental Direct Testimony  
8 does not contain any substantive material except to identify those exhibits.

9 Q: With reference to the Mike W. Tatlock Affidavit dated April 7, 2008 and identified as  
10 Respondent Exhibit 7.1, did you notice certain items of interest to you in that Affidavit?

11 A: Yes. Mr. Tatlock discusses in general the Texas substation which I have already  
12 discussed in my direct and rebuttal testimony filed in this matter. In addition, Mr.  
13 Tatlock noted at page 2, paragraph 10 of the April 7, 2008 Affidavit that Texaco, Inc.  
14 owned four separate primary 12.47 kV distribution circuits emanating from the Texas  
15 substation to serve the Salem Unit Oil Field. Mr. Tatlock also pointed out in paragraph  
16 17 at page 4 of the April 7, 2008 Affidavit that Citation Oil had initially discussed with  
17 him the possibility of applying for a new point of delivery to serve the electrical energy  
18 needs of the gas plant which Citation was constructing and which are at issue in this  
19 docket. Mr. Tatlock also noted that after a meeting which he attended, Citation Oil  
20 through its representatives, Jeff Lewis and Ed Pearson, decided not to apply for a new  
21 point of delivery for the electric service to the gas plant, but rather to extend electric  
22 service to the new gas plant from Citation's existing privately owned distribution system  
23 that took electric service from IP at the Texas substation and transported it throughout the

1 Citation Oil Field. It is interesting to note that Mr. Tatlock also pointed out that IP did not  
2 construct any new distribution lines to provide electric energy to Citation Oil's gas plant.

3 Q: What, if anything else of interest did you note in the April 7, 2008 Affidavit of Mr.  
4 Tatlock?

5 A: I noted that in fact Citation Oil did discuss with IP the need to establish a new electric  
6 service connection point for providing electric service to the gas plant. This without any  
7 doubt indicates to me that both Citation and IP, including Mr. Tatlock as the engineer  
8 dealing with Citation at this time of reference for electric service to the gas plant, knew  
9 that there would have to be installed transformers to step down the 12.47 kV distribution  
10 line voltage to a voltage usable by the motors at the gas plant as well as the installation of  
11 necessary cut outs, fuses, electrical service conductors, and switches at the point where  
12 the electricity would leave the distribution line to be used by the motors at the gas plant.  
13 This is the classic definition of a point of delivery or service connection point within the  
14 electric industry. This discussion by Mr. Tatlock also makes it perfectly clear to me that  
15 both the representatives of Citation as well as Mr. Tatlock and the other representatives of  
16 IP dealing with this request by Citation for electric service to the gas plant were well  
17 aware of the standards within the electric utility industry for providing electric service. It  
18 also is abundantly clear to me from that conversation Mr. Tatlock had with the Citation  
19 representatives that Mr. Tatlock knew that since the Citation gas plant was located in  
20 Tri-County's service territory under the Service Area Agreement in question, the  
21 placement of the service connection point, that is the step down transformers, switches,  
22 service conductors, and other apparatus associated with the reduction of 12.47 kV  
23 distribution line voltage to a voltage usable by the gas plant electric motors, would be

1 located within Tri-County's service territory and under the Service Area Agreement  
2 would be Tri-County's electric service to provide. This explains to me why the various  
3 e-mail communications between Michael Tatlock and other representatives of IP as well  
4 as representatives of Citation during this time period noted very clearly that electric  
5 service to the gas plant should be provided by Tri-County under the Service Area  
6 Agreement and not IP and if Citation wanted IP to provide the electric service, Citation  
7 had to move the physical location of the gas plant so that it would be located within IP's  
8 service territory under the agreement.

9 Q: What if anything does the comment by Mr. Tatlock in his April 7, 2008 Affidavit at  
10 paragraph 18, page 4, wherein he states that Citation ultimately decided to extend its own  
11 distribution system to provide electric energy to the gas plant, indicate?

12 A: This clearly indicates that IP and Citation were attempting to avoid the terms of the  
13 Service Area Agreement at issue in this case by allowing Citation to use its privately  
14 owned distribution system to take IP electricity from the Texas substation into the new  
15 service connection point established by Citation for the Citation gas plant all located in  
16 the Tri-County service territory. It is also important to remember that Citation did not  
17 have a distribution line located close enough to the Citation gas plant which was suitable  
18 for delivering electric service to the gas plant. Thus, Citation had to construct 4,119 feet  
19 of new 2/O ACSR three phase line and rebuild 1,161 feet of #4 CU three phase line to  
20 2/O ACSR three phase line in order to be able to distribute IP's electric energy i.e.  
21 electricity from the Texas substation to the service connection point for the gas plant  
22 located in Tri-County's service territory. It certainly appears from Mr. Tatlock's April 7,  
23 2008 Affidavit that IP and Citation concluded they could avoid the requirements of the

1 IP/Tri-County Service Area Agreement if IP did not construct a distribution line, but  
2 allowed Citation to construct a new distribution line and rebuild older, inadequate  
3 distribution lines to deliver IP's electricity to the new gas plant located in Tri-County's  
4 service territory allowing IP to do indirectly what it could not do directly.

5 Q: Is this conclusion by you, that IP is trying to be the electric service provider for the  
6 Citation gas plant located in Tri-County service territory by indirect methods through use  
7 of the Citation private distribution line, supported by any other testimony in this docket?

8 A: Yes. I have reviewed the deposition of Keith Malmedal, PHD., P.E. who presented  
9 direct testimony on behalf of IP in this docket as IP Ameren Exhibit 5. In that deposition  
10 taken on December 2, 2009 commencing at line 24 of page 39 through page 43, Mr.  
11 Malmedal specifically stated that if IP owned the 12.47 kV distribution line used to  
12 deliver the IP electricity from the Texas substation to the Citation gas plant and the  
13 service connection point for the gas plant, then the step down transformers, cut outs,  
14 fuses, electrical service conductors, switches and associated equipment would be the  
15 service connection point for the gas plant all of which are located in Tri-County service  
16 territory. A copy of pages 39-43 of Mr. Malmedal's deposition is attached to my  
17 Supplemental Rebuttal Testimony as Exhibit G-2. Thus, it is very clear that Citation  
18 representatives and IP representatives met and determined that they believed they could  
19 circumvent the rules of the Service Area Agreement between Tri-County and IP by  
20 having Citation construct a new distribution line and upgrade an older existing  
21 distribution line in order to deliver IP electricity from the IP Texas substation to the  
22 Citation gas plant situated in Tri-County's service territory.

23 Q: What, if anything, else does the Mike W. Tatlock's affidavit dated June 20, 2008

1 comment about?

2 A: Mr. Tatlock referred to various electric service contracts between IP and Texaco with  
3 respect to the Citation oil field and various IP electric tariffs to note that all of those  
4 documents referenced that the “point of delivery” for electric energy would be identified  
5 for purposes of those documents as the place where the electricity was handed off to the  
6 customer. In addition, Mr. Tatlock references Sections from Title 83 entitled “Public  
7 Utilities, Part 410 entitled “Standards of Service for Electric Utilities and Alternative  
8 Retail Electric Suppliers” to note that “point of delivery” is defined in those Rules as the  
9 point where the electric lines of the utility connect with the facilities of the customer.

10 Q: What, if anything, would you note with respect to those comments by Mr. Tatlock?

11 A: I would note that none of the contracts for electric service between IP and Texaco and IP  
12 and Citation include Tri-County as a party to those contracts. Neither do those contracts  
13 reference any of the terms of the Service Area Agreement between Tri-County and IP at  
14 issue in this case. Likewise, the Service Area Agreement between Tri-County and IP at  
15 issue in this case does not reference those existing electric service contracts between IP  
16 and the customer in this case, Citation or Texaco. In addition, Mr. Tatlock’s reference to  
17 the Part 410 of the administrative rules applicable to The Standards of Service for Electric  
18 Utilities and Alternative Retail Electric Suppliers fails to include Part 410.20 entitled  
19 “Application” which clearly states that the standards of service for electric utilities and  
20 alternative retail electric suppliers does not apply to any electric cooperative that is  
21 operating within its own service territory. I attach a copy of Part 410.20 to my  
22 Supplemental Rebuttal Testimony as Exhibit G-1.

23 Q: Have you had an opportunity to determine what accepted engineering practices would

1 require for providing electric service to the Citation gas plant and the eight compressor  
2 sites?

3 A: Yes. Accepted engineering practices would require an electric provider, such as IP or  
4 Tri-County, to provide the necessary step down transformers, switches, cut outs, fuses,  
5 electric service conductors, and associated equipment required to safely reduce the  
6 voltage brought in at 12.47 kV on the electric distribution line from the substation to a  
7 voltage usable by the electric motors at the gas plant and each of the seven gas  
8 compressor sites at issue in this docket. To do otherwise would destroy the electric  
9 motors used at each of those sites and would not provide the type of dependable electric  
10 service demanded by customers including Citation.

11 Q: Did you have an opportunity to review the Prepared Direct Testimony of Michael Garden  
12 of Citation Oil & Gas Corp. on behalf of IP filed as AmerenIP Exhibit 10 in this docket?

13 A: Yes.

14 Q: Did you also have an opportunity to inspect the Citation distribution line at the Citation  
15 Oil field as well as representative examples of Citation oil wells, water pumping stations,  
16 and other Citation apparatus operated by electric motors?

17 A: Yes. I made an inspection on June 3, 2010 accompanied by representatives from  
18 Tri-County and IP under the guidance of Michael Garden, Senior Production Foreman for  
19 Citation at the Citation Oil field, Salem, Illinois.

20 Q: During that inspection, were you allowed to examine representative portions of the  
21 Citation electric distribution system?

22 A: Yes.

23 Q: Would you describe the Citation electric distribution system you observed on June 3,

1 2010 with the exception of that portion of the electric distribution system used to serve  
2 the Citation gas plant which you have already described in your direct and rebuttal  
3 testimony?

4 A: The Citation electrical distribution system consists of wooden poles, wooden crossarms,  
5 aluminum and copper conductors, transformers, etc. used to supply 3-wire, 12.47 kV  
6 electricity to the oil field equipment. The construction is similar to RUS/REA  
7 construction except that it is a 3-wire system instead of a 4-wire multi-grounded system.  
8 The system has been in existence for many years based upon my visual inspection of a  
9 portion of the system.

10 Q: What, in your opinion, is the general condition of the electric distribution system utilized  
11 by Citation?

12 A: The general condition of the Citation electric distribution system is such that it does not  
13 comply with the standards utilized by the electric cooperatives including Tri-County  
14 Electric Cooperative, Inc. In many cases, I observed distribution transformers with  
15 inadequate elevation allowing for inadequate clearance underneath the same, the  
16 distribution line was not maintained to those standards customary to electric cooperative  
17 electric distribution systems, and would because of its condition be more susceptible to  
18 electric outages caused by storms, animals or other customary causes for electric outages.

19 Q: In your opinion, how does the general condition of the Citation electric distribution  
20 system compare to the type of electric distribution system that would be used by  
21 Tri-County if it was providing the electric service to the gas plant and the eight  
22 compressor sites?

23 A: The Tri-County electric distribution system that would be used to provide electric service

1 to the Citation gas plant and seven of the eight Citation gas compressor sites would be  
2 built and maintained to higher standards and would meet or exceed all requirements of  
3 the National Electric Safety Code (NESC). As a result, there would be less chance of  
4 electric outages on the Tri-County electric distribution system facilities than on the  
5 Citation electric distribution facilities.

6 Q: Were you able to determine how many circuits are utilized to provide electricity through  
7 the Citation oil field by means of the Citation electric distribution system?

8 A: Yes. There are four circuits. The deposition of Michael Garden, taken June 3, 2010,  
9 which I have reviewed, notes that there are four main circuits for electric service to the  
10 Citation oil field. The voltage is 12.5 kV or 12,500 volts on each of the distribution  
11 circuits. The circuits were identified by Mr. Garden as the Magnolia circuit which brings  
12 electricity to a majority of the north end of the oil field and serves oil wells as well as gas  
13 compressor sites numbers 1 and 5. The Texas circuit which serves part of the western  
14 portion of the oil field and part of the north end of the oil field as well as part of the south  
15 end of the oil field. It provides electric service to gas compressors sites numbers 2 and 3.  
16 The Plant circuit which provides electricity to the gas plant and the water plant as well as  
17 some oil wells served directly from the primary line. The Plant circuit appears as a red  
18 line on IP Exhibit No. 10.2 and is the circuit which was both upgraded and added to by  
19 Citation in order to provide electric service to the gas plant. The South circuit serves the  
20 south battery located adjacent to the gas plant and also serves a majority of the oil wells  
21 in the south end of the field as well as gas compressor sites numbers 4, 6, 7 and 8. The  
22 references by Mr. Garden to the circuits are at page 12 through 18 and pages 55 through  
23 57 of Mr. Garden's deposition, a copy of which is attached to my Supplemental Rebuttal

1 Testimony as Exhibit G-3. During Mr. Garden's deposition he also identified in red  
2 pencil the location of each of the Citation distribution circuits by name, Magnoila, Texas,  
3 Plant, and South, on IP Exhibit 10.2 which he sponsored and which I attach to my  
4 Prepared Supplemental Rebuttal Testimony as Exhibit G-4.

5 Q: What, if anything, were you able to determine upon observing the representative well  
6 sites with regard to the electric motors and electric facilities used to operate the same?

7 A: I was shown representative sites of operating oil wells. All were powered by electric  
8 motors. The majority of the electric motors appeared to be 25 horsepower, although Mr.  
9 Garden in his deposition explained that the electric motors operating oil wells ranged  
10 from 15 horsepower to a few 40 horsepower and 50 horsepower electric motors. See Mr.  
11 Garden's deposition pages 18-19 and attached to my Prepared Rebuttal Testimony as  
12 Exhibit G-3.

13 Q: Would you please explain the electrical facilities that you observed that were used to  
14 operate the electric motors for operation of the oil wells observed by you during the  
15 inspection of the Citation oil field on June 3, 2010?

16 A: The electric facilities used to provide electrical service to the various oil wells consisted  
17 of overhead three-phase banked transformers with generally overhead service drops  
18 providing three-phase 480 volt service to the oil well pumps. The pumps that I inspected  
19 ranged from 25 HP to 40 HP and were used to drive the typical oil well pumps located in  
20 the oil field.

21 Q: In IP Exhibit 11 consisting of the Prepared Direct Testimony of Josh Kull, a Citation Gas  
22 & Oil Corp. employee, he indicated there had been a number of oil wells added to the  
23 Citation oil field from the 1970's to the present time. In that regard, do you know how

1 many oil wells are currently operating in the Citation oil field?

2 A: I know only what the Citation employees have testified to in their depositions and their  
3 testimony filed in this case. They have indicated there are approximately 310 operating  
4 oil wells in the Citation oil field and that has remained fairly constant since prior to the  
5 time Citation acquired the Salem oil field. I was also advised that additional oil wells  
6 may be opened and operated and oil wells will be permanently capped or temporarily  
7 abandoned as part of the ongoing operation.

8 Q: With the information you have learned, would there be much change in the electrical load  
9 required by the Citation oil field with the addition of oil wells from time to time?

10 A: No. A typical oil well would require a small electrical load each time a well is connected  
11 to the system and there would not be much if any change in the total electric load required  
12 for operating the Citation oil field.

13 Q: What, if anything, would the effect of adding loads such as the gas plant and water plant,  
14 which you observed, have on the overall electric load requirements for the Citation oil  
15 field?

16 A: Those types of loads when added would create a much larger demand for electricity and  
17 there would be a need to check the electric distribution system used to serve those loads  
18 and possibly upgrade or build additional electric distribution systems such as what was  
19 done to provide the electric service to the Citation gas plant. Also, Citation would have  
20 to check with its electrical provider to determine if such an additional large electrical load  
21 could be added to the system without causing difficulties for the provider of the electricity  
22 to Citation.

23 Q: Did you have a chance to review the Prepared Supplemental Testimony of Jeffrey Lewis

1 of Citation Oil & Gas Corp. filed in support of Illinois Power as AmerenIP Exhibit 9?

2 A: Yes.

3 Q: Did you note that Mr. Lewis testified at page 1 lines 9-14, page 2 lines 1-23, page 3 lines  
4 1-22, and page 4 lines 1-4, in his Prepared Supplemental Testimony filed as AmerenIP  
5 Exhibit 9 that you had failed to address the concerns raised by Mr. Lewis in his direct  
6 testimony filed as AmerenIP Exhibit 4, page 6, lines 15 through 22, and also raised in his  
7 letter of July 8, 2005 to Todd Masten of IP wherein he notes it is critical to the operation  
8 of the Citation's Salem oil field that they receive electricity from only one supplier?

9 A: Yes. I am aware of his testimony in that regard.

10 Q: Did you learn anything from the testimony given by Michael Garden on June 3, 2010 at  
11 his deposition relative to the various electric motors and electric systems operated by  
12 Citation through use of its Citation owned electric distribution system?

13 A: Yes.

14 Q: What, if anything did you learn in that regard?

15 A: I learned that in fact the Citation electric distribution system has four different circuits  
16 and that each circuit has various electrical operated apparatus connected to it. For  
17 instance, the Magnolia electric service serves the majority of the oil wells in the north end  
18 of the field as well as gas compressor sites numbers 1 and 5. In addition, there is the  
19 Texas circuit which serves oil wells in part of the north field, wells in the eastern part of  
20 the oil field, and wells in the western part of the oil field and in addition, serves gas  
21 compressor sites numbers 2 and 3. The third circuit is called the Plant circuit which  
22 serves the gas plant at issue in this case and the water plant which has a large electrical  
23 load as well a few oil wells. The fourth circuit is called the South circuit which serves

1 the oil collection facilities in the south end of the field called the South Battery and a  
2 majority of the oil wells in the south end of the field as well as gas compressor sites  
3 numbers 4, 6, 7, and 8. (See Mr. Garden's deposition marked Exhibit G-3 pages 55-57). I  
4 also learned that the Citation electric distribution system suffers occasional outages due to  
5 storms, lightening strikes and other physical interferences with the distribution of  
6 electricity as well as outages caused by mechanical failure. (See Mr. Garden's deposition  
7 marked Exhibit G-3 pages 44-48). I also learned that Citation does not have any method  
8 whereby if a circuit is out, that it can back feed electric power to the wells and other  
9 mechanical devices operated from that electrical circuit and that if an outage on one  
10 circuit occurs and there is still electric power on the other circuits, that Citation usually  
11 keeps those other circuits operating and the devices located on them operating. I also  
12 learned that the longest outage Citation has experienced on any particular circuit since  
13 Mr. Garden has been with Citation, that is over the last eight years, was an outage on the  
14 Texas circuit that lasted for 36 hours. (See Mr. Garden's deposition marked Exhibit G-3  
15 pages 49-50). Mr. Garden also noted that they have had outages on the Plant circuit also.

16 Q: Based upon the information obtained from Michael Garden in his deposition of June 3,  
17 2010 as well as Mr. Gardens Direct Testimony, is Mr. Lewis correct when he states in his  
18 Prepared Supplemental Testimony marked AmerenIP Exhibit 9 at page 3, commencing  
19 with line 20 through 22 and page 4, commencing with lines 1 through 4 that you  
20 incorrectly stated the gas plant is on one circuit and gas wells were on different circuits?

21 A: No, Mr. Lewis is not correct according to Mr. Garden. Mr. Garden stated the gas  
22 compressor sites numbers 1 and 5 are on the Magnolia circuit, gas compressor sites  
23 numbers 2 and 3 are on the Texas circuit, gas compressor sites numbers 4, 6, 7 and 8 are

1 on the South circuit, and the gas plant is on the Plant circuit. Thus, the gas plant is on  
2 one circuit and the gas compressor sites that provide gas to the gas plant are all on other  
3 circuits. In addition, Mr. Lewis has testified in his Prepared Supplemental Testimony  
4 AmerenIP Exhibit 9 at page 2 commencing with line 13 through line 23 and page 3, lines  
5 1 through 5, that Citation does not maintain automated switches so that electric power can  
6 be shut down should electric power be interrupted to any one of the gas compressor sites  
7 and/or the gas plant and not to the other. Since Citation does not now maintain  
8 automated switches for shutting down electric power to gas compressor sites and the gas  
9 plant when power fails on one of the circuits providing electricity to any one of those  
10 facilities, Citation is currently, in my opinion, at risk of causing mechanical harm to the  
11 gas plant or the gas compressor sites even though it has only one electric power provider.  
12 Thus, the reasons given and the examples used by Mr. Lewis of potential problems to the  
13 Citation gas plant and gas compressor sites caused by having two different electric  
14 suppliers as set forth in his Prepared Supplemental Testimony marked Ameren IP Exhibit  
15 9 at page 1 line 12 through 14, and page 2, lines 1 through 12, can occur even now with  
16 only one electric provider. For example, Mr. Lewis states that if electricity to the gas  
17 plant which is provided currently through the Citation Plant circuit goes down, the gas  
18 compressor sites which receive electricity from the Magnolia circuit, the Texas circuit  
19 and the South circuit, would continue to produce gas that the plant could not collect and  
20 process allowing the gas to release into the atmosphere, wasting a valuable resource.  
21 That example given by Mr. Lewis could occur under the current arrangement Citation has  
22 for electric power provided by only one electric supplier if in fact Citation lost electric  
23 power to the gas plant through the Plant circuit. Likewise, the example by Mr. Lewis

1 that if power to the gas producing wells was lost and the power continued to the gas plant,  
2 the equipment at the plant would overheat and sustain damage. Under Citation's current  
3 electrical operation with only one electric provider, that problem could exist with electric  
4 power lost on any one or more of the Magnolia circuit serving gas compressor sites  
5 numbers 1 and 5, the Texas circuit serving gas compressor sites numbers 2 and 3, and the  
6 South circuit serving gas compressor sites numbers 4, 6, 7 and 8 resulting in the loss of  
7 gas provided to the gas plant and the gas plant overheating and sustaining damage. On  
8 the other hand, if Tri-County were authorized to provide electric service to the gas plant  
9 and seven of the eight gas compressor sites, Citation would be in no different situation  
10 than it currently is if it lost electric power on any one of the circuits or from its electrical  
11 provider, Tri-County. The only way to protect against the problems raised by Mr. Lewis  
12 in his Prepared Supplemental Testimony identified as AmerenIP Exhibit 9 is to provide  
13 automated switches that shut down those facilities when other facilities processing the gas  
14 loose electric power or have internal pressure and volume controls available to protect the  
15 equipment.

16 Q: Did you have a chance to review the Prepared Direct Testimony of Robert C. Herr filed as  
17 AmerenIP Exhibit 8 in support of Illinois Power Company in this docket?

18 A: Yes.

19 Q: Does the testimony of Mr. Herr deal with any matters regarding the providing of electric  
20 service to the Citation Salem oil field?

21 A: No. The testimony of Mr. Herr relates to state laws dealing with the right of oil  
22 companies operating oil fields removing oil from reservoirs through leases and the right  
23 of the operators and the owners of the mineral interests to combine their interests forming

1 various units so that all share in the ability to remove the oil from the reservoir in a  
2 manner which maximizes recovery of oil from the reservoir. Nothing in that testimony  
3 deals with the use of electric power provided by electric providers operating under  
4 electric service territory agreements whereby each of their respective service territories  
5 are defined in such a manner so that each electric provider has the exclusive right to  
6 provide all electric service to those customers located within the electric provider's  
7 electric service territory.

8 Q: Does Mr. Herr mention in his testimony anything with regard to the Citation electric  
9 distribution system?

10 A: Yes. On page 4 at lines 3 through 8, Mr. Herr states that Texaco chose to operate its own  
11 electric distribution system throughout the field so that it could standardize its  
12 installations and employ its own electricians trained in electrified oil field facilities,  
13 motors and equipment. However, that statement fails to note that electric service  
14 providers are in the business of providing electricity to their respective customers  
15 utilizing electric distribution systems that are far more involved than the electric  
16 distribution system used by Citation and, before it Texaco, in the Citation oil field. In  
17 addition, all electric providers have many trained linemen who construct and maintain  
18 those electric facilities so that electricity is provided in a dependable and safe manner to  
19 all customers. Further, Mr. Herr ignores the fact that Tri-County has many miles of  
20 electric distribution lines located throughout the Citation oil field and most of those lines  
21 are located in close proximity to many of the Citation facilities utilizing electric service in  
22 the Citation oil field. The Tri-County electric distribution facilities are constructed and  
23 maintained pursuant to higher standards than the Citation electric distribution facilities

1 appear to be that I observed on my June 3, 2010 inspection of the Citation electric  
2 distribution system at the Citation Salem oil field.

3 Q: What, if any, information regarding use of electricity by the Citation Salem unit oil field  
4 appears in Mr. Herr's Prepared Direct Testimony in support of Illinois Power Company  
5 marked Ameren IP Exhibit 8?

6 A: At page 4, lines 11 through 22, Mr. Herr refers to traditional wells that require electricity  
7 for their pumping operations utilizing electric motors ranging between 5 horsepower and  
8 50 horsepower and certain water pumping stations using electric motors with as much as  
9 2500 horsepower. However, based upon my June 3, 2010 inspection of Citation's Salem  
10 oil field, most of the oil wells are operated by electric motors with 25 horsepower and  
11 those types of electric installations do not create a large electric load. Citation does have  
12 at least one large water pumping station with a large electric load which I understand  
13 from my inspection of the field has been in place and operating for a long time. Mr. Herr  
14 makes a limited reference to prior projects conducted by Texaco, a prior owner of the  
15 Citation oil field, which utilized large electrical motors for operation of the wells and  
16 other apparatus used to operate the project. However, it is my understanding that those  
17 projects were not in operation when Citation acquired the oil field and my June 3, 2010  
18 inspection of the oil field did not disclose any large project of the nature described by Mr.  
19 Herr on page 6, lines 1 through 11 of his Prepared Direct Testimony marked AmerenIP  
20 Exhibit 8.

21 Q: Can an electric provider such as Tri-County provide adequate and dependable electric  
22 service to the electric facilities of Citation utilized for operating their gas plant and the  
23 seven gas compressor sites located within Tri-County's service territory?

1 A: Yes. It is clear that Tri-County has adequate capacity with its Salem substation located  
2 virtually adjacent to the IP/Texas substation. Further, Tri-County's electric distribution  
3 lines are located adjacent to the Citation gas plant and also adjacent to the seven gas  
4 compressor sites at issue in this case. In addition, Tri-County has numerous miles of  
5 electric distribution lines located throughout the Salem oil field serving residential and  
6 farm customers. The Tri-County electric distribution system is a 12.47 kV distribution  
7 system, which is the same voltage as the Citation distribution system, and Tri-County's  
8 electric distribution system is constructed and maintained to the high standards required  
9 by rural electric cooperatives and the National Electric Safety Code (NESC).

10 Respectfully Submitted,

11 Robert C. Dew, Jr. P.E.

Tricountydewsupplementalsurrebuttaltestimony/jtelec

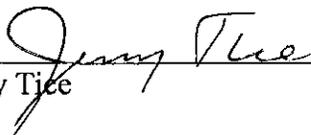
PROOF OF SERVICE

I, JERRY TICE, hereby certify that on the 12th day of July, 2010, I deposited in the United States mail at the post office at Petersburg, Illinois, postage fully paid, a copy of the Supplemental Prepared Rebuttal Testimony of Robert C. Dew, Jr. P.E. in Support of Tri-County Electric Cooperative, Inc. and attached hereto, addressed to the following persons at the addresses set opposite their names:

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\_\_\_\_\_  
Jerry Tice