

ILLINOIS COMMERCE COMMISSION

DOCKET No. 12-0080

SURREBUTTAL TESTIMONY

OF

JERRY A. MURBARGER

Submitted On Behalf

Of

AMEREN ILLINOIS COMPANY

d/b/a Ameren Illinois

May 24, 2012

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7 **I. INTRODUCTION AND WITNESS QUALIFICATIONS**

8 **Q. Please state your name and business address.**

9 A. My name is Jerry A. Murbarger. My business address is 370 S. Main Street, Decatur,
10 Illinois, 62523-1479.

11 **Q. Are you the same Jerry Murbarger who provided direct testimony and rebuttal**
12 **testimony in this proceeding?**

13 A. Yes, I am.

14 **Q. What is the purpose of your surrebuttal testimony?**

15 A. The purpose of my surrebuttal testimony is to respond to ICC Staff witness Mr. Rockrohr
16 regarding his proposed modification to AIC's Primary Route.

17 **II. RESPONSE TO STAFF WITNESS MR. ROCKROHR**

18 **Q. What is Mr. Rockrohr's recommended modification to AIC's Primary Route?**

19 A. Mr. Rockrohr recommends the Commission grant AIC its requested certificate of public
20 convenience and necessity for the Transmission Line and an order pursuant to Section 8-503

21 with two modifications: (1) AIC should utilize dual circuit structures for the three-mile route
22 segment immediately south of Bondville Route 10 Substation; and (2) AIC should route the line
23 north to Curtis Road along the east side of I-57 and then east on the "existing [wood] structures
24 on the north side of Curtis Road between Duncan Road and Mattis Ave."

25 **Q. Do you have any clarifications about the location of the wood poles along Curtis**
26 **Road between Duncan Road and Mattis Avenue?**

27 A. Yes. The one mile segment of tall wood poles runs east from Duncan Road north of
28 Curtis Road for approximately one-half mile and then cuts south of Curtis Road and ends at
29 Mattis Avenue.¹ The segment of tall wood poles is a 12 kV distribution line. The existing 138
30 kV distribution line along Curtis Road from Mattis Avenue to Highway 45 is a separate segment
31 and is the "Existing Distribution Line" included in AIC's proposed primary route.

32 **Q. Could AIC build the transmission line with these modifications?**

33 A. Yes. AIC can construct the Transmission Line with these modifications, and will do so if
34 so ordered by the Commission and if it can obtain full cost. However, AIC's proposed primary
35 route is superior to Mr. Rockrohr's modified route for the reasons I explained in my rebuttal
36 testimony, and as also discussed by Mr. Foster and Ms. Murphy. The concerns I expressed in
37 rebuttal were, among other things, that constructing double circuit lines would increase the
38 Project's cost and that when maintenance is required on one line, both lines must be taken out of

¹ Mr. Rockrohr also states the wood poles are located "west of Interstate 57 on AIC's preferred route" in his rebuttal testimony, but I assume he meant to say "west of Mattis Avenue on AIC's preferred route." (ICC Staff Ex. 3.0, p. 14.)

39 service during the maintenance process. I believe the Commission should be aware of these
40 concerns if it adopts Mr. Rockrohr's recommended modification.

41 **Q. Are there other concerns?**

42 A. Yes. Regarding Mr. Rockrohr's proposed modification along Curtis Road, AIC had
43 planned to design the Primary Route from the point south of the Bondville Route 10 Substation
44 where the line turns east to the intersection of Curtis Road and Mattis Avenue as double circuit
45 to allow for a potential future 69 kV line. If AIC is ordered to use the existing wood structures
46 along Curtis Road, AIC will not be able to design a 138 kV/69 kV double circuit because the
47 wood structures cannot accommodate a third line in addition to the existing 12 kV line and
48 proposed 138 kV line. As a result, AIC will lose some flexibility in its future planning in this
49 area. For example, AIC could then have to build a new standalone 69 kV line to serve the
50 potential distribution substation in the vicinity of I-57 and Curtis Road discussed by Mr. Foster.

51 **Q. What is Mr. Rockrohr's view on the added cost of constructing dual circuit lines?**

52 A. He believes that AIC can save approximately \$3 million of the aggregate cost of the
53 Transmission Line and the Sidney–Rising line by using dual circuit tower along a three mile
54 route segment.

55 **Q. Is this correct?**

56 A. His estimate of the difference in cost between construction of dual circuit towers and
57 standalone 345 kV and 138 kV lines along the three mile section he references is correct.
58 However, his testimony that there will be cost savings is based on the assumption that the
59 Commission approves the Sidney-Rising line along the same route as the Transmission Line. If

60 this assumption proves incorrect, and the Sidney-Rising line is constructed on another route,
61 construction of dual circuit line will actually add \$6 million cost to the aggregate cost of the two
62 lines.

63 **Q. Does Mr. Rockrohr recognize this concern?**

64 A. In part. He states “if Ameren determines that its preferred route for the 345 kV Sidney to
65 Rising transmission line will not share this route segment, there would be no reason to use the
66 dual circuit towers.” However, the decision on which route to use is ultimately the
67 Commission’s decision, not AIC’s. Thus, I do not think it is correct to say that the decision on
68 which route is used for Sidney-Rising is just AIC’s determination.

69 **Q. Does Mr. Rockrohr acknowledge your concern about the maintenance issue?**

70 A. Yes. He states that maintenance should not be a deterrent for using dual-circuit towers
71 for the proposed limited distance of three miles, since required maintenance in such a short
72 section should be very infrequent.

73 **Q. Do you have any comments on his position?**

74 A. Regardless of how short the section would be, or how infrequent maintenance may be
75 required, if the right condition or incident occurred at a time when line loads were heavy on
76 either of the two lines, taking one line out of service to do maintenance on the other would not be
77 desirable from a reliability standpoint.

78 **Q. Mr. Rockrohr states that although AIC has not yet filed a petition to construct the**
79 **345 kV Sidney to Rising transmission line, the Commission should consider both that line**
80 **and the Transmission Line in this docket. Do you agree?**

81 A. As Mr. Foster explains, a future Sidney-Rising line and the Bondville Transmission Line
82 are two separate projects with separate purposes. It is my understanding that the Sidney-Rising
83 line is part of a larger project, which has only just begun the statutorily required public meeting
84 process, which is required to last at least approximately six months. Put another way, it is at
85 least six months before AIC could even file a petition seeking a certificate and order for that
86 project. It would then be at least another five months before the Commission issued an order on
87 Sidney-Rising. I don't believe it is reasonable to condition the routing of the Transmission Line
88 on the outcome of another project, with different factors and concerns, when the outcome of that
89 other project remains uncertain.

90 **Q. Will AIC nevertheless consider the potential route location of the Sidney-Rising line**
91 **when constructing the Transmission Line?**

92 A. Yes. To the extent feasible and if applicable information is available, AIC will consider
93 the potential location of the Sidney Rising line when constructing the Transmission Line. For
94 example, if the Commission orders AIC to construct dual circuit structures in this proceeding,
95 but AIC determines that the Sidney-Rising line proposed routes would not follow the dual circuit
96 route, if that information is available in time to be considered when equipment is being ordered
97 for the Transmission Line, AIC would take that information into consideration.

98 **Q. What is the minimum width of right-of-way required for a 345 kV line?**

99 A. The minimum width of right-of-way required for a 345 kV line is 150 feet.

100 **Q. Would AIC be required to seek additional easements if ordered to build the 138 kV**
101 **and 345 kV line on the same right-of-way using dual circuit towers?**

102 A. Yes. AIC would have to acquire additional land rights in order to provide the necessary
103 clearances for both the 138 kV and 345 kV lines. If the Commission directs AIC to build the
104 dual circuit towers, it should also then direct AIC to acquire 150 foot easements in this segment
105 to accommodate the possibility of a future 345 kV line.

106 **III. CONCLUSION**

107 **Q. Does this conclude your surrebuttal testimony?**

108 A. Yes, it does.