

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN TRANSMISSION COMPANY OF ILLINOIS	§	
	§	Docket No. 12-0598
Petition for A Certificate of Public Convenience and	§	
Necessity, pursuant to Section 8-406.1 of the Illinois Public	§	
Utilities Act	§	

**CITY OF CHAMPAIGN'S REPLY
TO AMEREN TRANSMISSION COMPANY OF ILLINOIS'
RESPONSE TO ALJs' DATA REQUEST ALJ 1.01**

The City of Champaign (Champaign) files this reply to Ameren Transmission Company of Illinois's (ATXI) response to the Administrative Law Judges' (ALJ) Data Request 1.01.

On December 19, 2012, ATXI filed its response to the ALJs' Data Request 1.01, which asked:

Why is the construction of a 345 kV transmission line between Sidney and Rising, Illinois part of the Illinois Rivers Project?

Please explain why the construction of this transmission line cannot be considered on a standalone basis in a separate docket.

In order to reduce the number of issues to be resolved under the shortened statutory deadline, would ATXI be willing to withdraw the Sidney to Rising portion of its Illinois Rivers Project? If not, please explain why.

ATXI responded that the Sidney to Rising line was "examined and analyzed simultaneously during the MISO MTEP process" and therefore is part of the Illinois Rivers Project. ATXI further responded that it was unwilling to withdraw the Sidney to Rising transmission line from this Docket. ATXI argued that, if the Sidney to Rising line were considered as a separate docket, it would delay the construction of the entire Illinois Rivers Project. ATXI's arguments do not justify keeping the Sidney to Rising line in this Docket, and Champaign supports severing that project into its own docket for the reasons outlined below.

I. The Sidney to Rising Proposed Line Is Physically Separate from the Illinois Rivers Project and It Is Appropriate for It to Have a Separate Docket.

Because the Sidney to Rising proposed line is physically separated from the Indiana to Missouri Illinois Rivers Project, requiring ATXI to file a new docket is appropriate and would not delay the construction of the cross-Illinois 345 kV line.

The Sidney to Rising transmission line is not physically connected to the proposed 345 kV line, which runs through Illinois from Indiana to Missouri. On the Illinois Rivers Project website, ATXI itself refers to the line as “an isolated approximately 28-mile long line linking the Rising and Sidney substations in the Champaign area.” www.ilriverstransmission.com/need (last visited December 23, 2012). ATXI’s own exhibits show that the dog-leg line west and south of Champaign is isolated from the cross-Illinois Rivers Project line. Both Exhibit A to ATXI’s Petition and ATXI Exhibit 2.4, copies of which are attached to this reply, graphically show that the line is physically separate and apart from the Illinois Rivers 345 kV line from Indiana to Missouri. In Docket No. 12-0080, Ameren itself described the Sidney to Rising line as a separate project that “consists of approximately 27 miles of 345 kV line between the AIC-owned Sidney and Rising substations.” Ameren Initial Brief, Docket No. 12-0080 at 12.

As a physically separate line and one that Ameren has itself described as a separate project, its consideration in a separate docket should not delay the cross-Illinois Rivers Project line. In fact, the Sidney to Rising line has its own separate set of issues that would complicate this Docket.

Because the Sidney to Rising line is physically separated from the cross-Illinois Rivers Project line and is a separate project, severing the Sidney to Rising line from this Docket is appropriate.

II. The Sidney to Rising Line Has Been in Planning Since the 1970s and This Commission Has Made Findings Relating to The Right of Way.

It is also appropriate to sever the Sidney to Rising line from this Docket because, unlike the cross-Illinois 345 kV Rivers Project, the Sidney to Rising line has been under consideration since the 1970s and much of the right of way has been acquired. In Docket No. 12-0080, Ameren's own witness testified that the 345 kV line from Sidney to Rising was first proposed in the 1970s and that much of the right of way was acquired in the 1970s. Ameren Exhibit 6.0, Foster Rebuttal at 7, a copy of which is attached to this reply. These facts are far different from the cross-Illinois Rivers Project. In addition, this Commission already has made some findings regarding the Sidney to Rising transmission line in Docket No. 12-0080. Judicial efficiency would be served by severing this separate line and its issues from this Docket.

III. The Expedited CCN Process Does Not Allow Filing for Multiple Lines Under One Project.

A severance of the Sidney to Rising line also is appropriate because ATXI's annexation of the separate Sidney to Rising line is contrary to the intent of 220 ILCS 8-406.1, which provides for an expedited procedure for obtaining a certificate of public convenience and necessity "for the construction of any new high voltage electric service line and related facilities (Project)." The plain language of the statute is that the expedited process is applicable only for the construction of a "new high voltage electric service *line*." The language does not allow a utility to combine multiple *lines* into one "Project," as ATXI has done in this Docket. In interpreting a statute, this Commission must "give effect to the intent of the legislature," and the most reliable indicator of intent is the statute's plain language. *Boaden v. Dep't of Law Enforcement*, 171 Ill. 2d 230, 237 (1996). "There is no rule of statutory construction that authorizes a court to declare that the legislature did not mean what the plain language of the

statute says.” *Ultsch v. Ill. Mun. Ret. Fund.*, 226 Ill. 2d 169, 184 (2007). Had the Legislature intended the expedited filing process to include multiple, unconnected transmission lines, the language would have provided for such a filing. Here, however, the language defines a “Project” as a single line. 220 ILCS 8-406.1. ATXI should not be permitted to pancake separate projects into one expedited filing.

In light of the ALJs’ *sua sponte* request to ATXI to consider voluntarily withdrawing its filing for the Sidney to Rising line and for the reasons stated above, Champaign requests that the Sidney to Rising line be severed from this Docket.

Respectfully submitted,

CITY OF CHAMPAIGN

_____/Richard C. Balough/_____
Richard C. Balough

Richard C. Balough
Cheryl Dancey Balough
BALOUGH LAW OFFICES, LLC
1 N. LaSalle St. Ste. 1910
Chicago IL 60602-3927
312.499.0000
rbalough@balough.com
cbalough@balough.com

CERTIFICATE OF SERVICE

I, Richard C. Balough, do hereby certify that a true and correct copy of the foregoing Response by the City of Champaign, Illinois, has been sent via electronic means to all parties on the Illinois Commerce Commission’s edocket service list for this Docket on this 24th day of December 2012.

_____/Richard C. Balough/_____

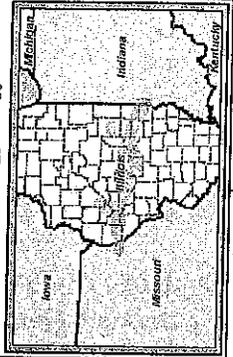


Illinois Rivers Project

Proposed Routes

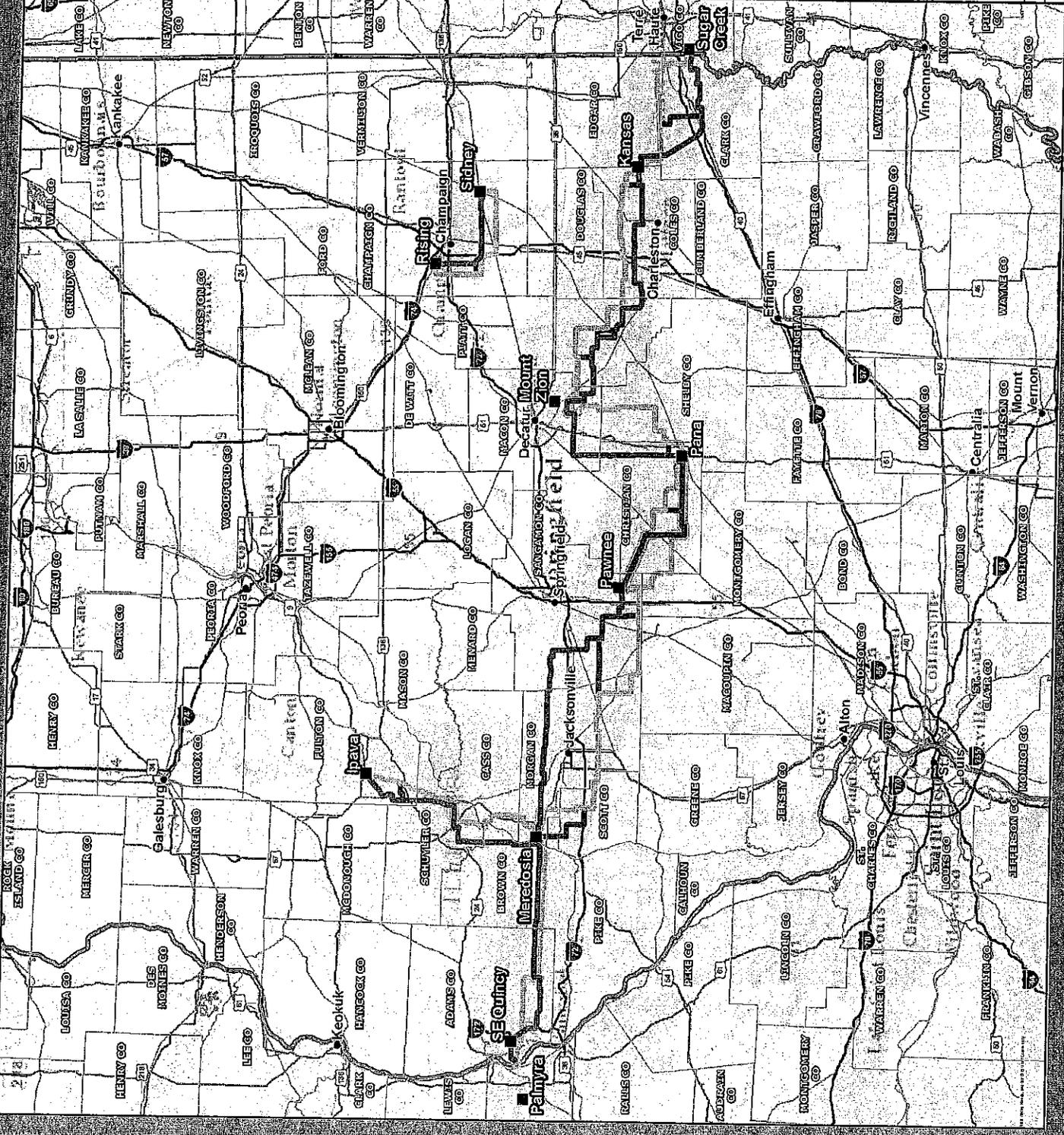
Legend

- Primary Route
- Alternate Route
- Segment Option
- Project Study Area
- Substation Connection Point
- State Boundary
- County Boundary
- Railroad
- Roads
- Interstate
- US Highway
- State Highway

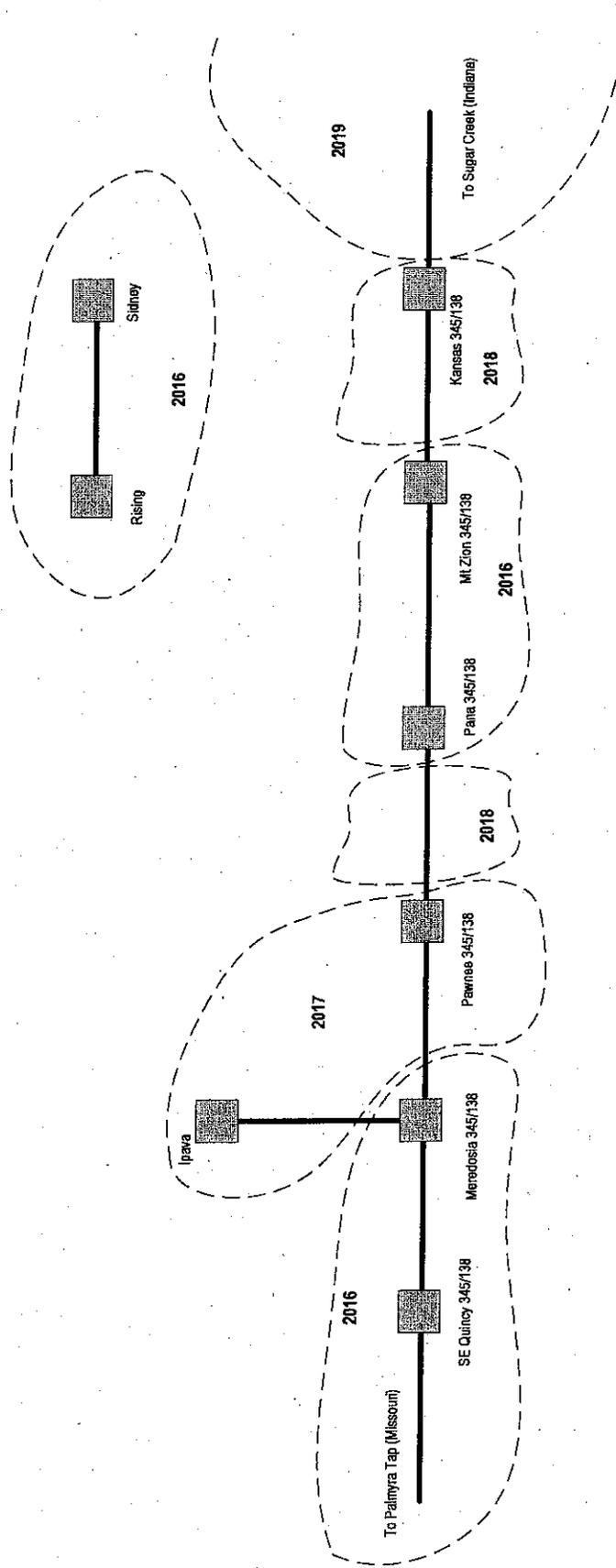


DATE: 11/06/12

Drawn by: S.BLITZSTEIN



Illinois Rivers 345 kV development



All new 345 kV circuits to be rated at 3000 A minimum under summer emergency conditions

ILLINOIS COMMERCE COMMISSION

DOCKET No. 12-0080

REBUTTAL TESTIMONY

OF

RICK L. FOSTER

Submitted On Behalf

Of

AMEREN ILLINOIS COMPANY

d/b/a Ameren Illinois

April 25, 2012

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1 **ILLINOIS COMMERCE COMMISSION**

2 **DOCKET No. 12-0080**

3 **REBUTTAL TESTIMONY**

4 **OF**

5 **RICK L. FOSTER**

6 **Submitted On Behalf Of**

7 **Ameren Illinois**

8 **I. INTRODUCTION**

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

10 A. My name is Rick L. Foster and my business address is 370 South Main Street,
11 Decatur, Illinois 62523.

12 **Q. Are you the same Rick Foster who provided Direct Testimony in this**
13 **proceeding?**

14 A. Yes, I am.

15 **Q. What is the purpose of your rebuttal testimony?**

16 A. My rebuttal testimony responds to ICC Staff witness Mr. Rockrohr's request to
17 provide additional information regarding AIC's plans for other transmission lines in the
18 Champaign area, specifically a 345 kV line between its Sidney and Rising substations.

19 **II. RESPONSE TO MR. ROCKROHR**

20 **Q. Briefly describe Mr. Rockrohr's recommendations in his direct testimony.**

21 A. Mr. Rockrohr testifies (p. 10) that a project is needed to reinforce AIC's 138 kV
22 system to mitigate the risk of voltage collapse in the Champaign area in 2015. He agrees
23 with AIC's conclusion that its proposed 138 kV transmission line would adequately
24 address the risk of voltage collapse in the Champaign area in 2015. However, Mr.
25 Rockrohr recommends AIC provide additional information regarding: (1) AIC's plans for
26 other transmission lines in the Champaign area, especially a 345 kV line between its
27 Sidney and Rising substations; (2) AIC's inclusion in its Petition of an alternative project
28 route that appears to be higher cost than other alternative mitigation options; and (3)
29 AIC's decision to not use a possibly less costly route for the transmission line parallel to
30 I-57 and near a location where it plans to construct a substation in the future. I will
31 respond to recommendation (1) and Mr. Murbarger and I will respond to (2). Mr.
32 Murbarger and Ms. Murphy will respond to (3) in their rebuttal testimonies.

33 **Q. Please summarize your response to his concerns from a planning perspective.**

34 A. The proposed Transmission Line represents the best, and least cost option, for
35 mitigating the risk of voltage collapse in the Champaign area by 2015. To the extent
36 there is concern about the relative cost of AIC's proposed alternate route, other mitigation
37 options are inferior in their ability to address the voltage collapse risk in a timely manner
38 and might produce, once route design and public participation processes are complete,
39 alternate routes just as expensive as the one in this proceeding. The proposed
40 Transmission Line is required even if a Sidney to Rising 345 kV line is constructed. In
41 terms of common routing, AIC is willing, if so directed by the Commission, to construct
42 the Transmission Line to accommodate a future Sidney to Rising 345 kV line on the

43 same route as the Transmission Line. However, in so directing the Commission should
44 be cognizant of AIC's preference to have transmission lines on separate routes, to
45 mitigate the impact of outage events and to facilitate maintenance scheduling.

46 **Q. What is Mr. Rockrohr's position regarding AIC's plans for other potential**
47 **transmission lines in the Champaign area?**

48 A. He believes AIC's routing for the planned Sidney to Rising 345 kV line is
49 relevant to this proceeding because the same landowners might be affected by both routes
50 and because it is possible that cost savings for both projects might be realized if AIC
51 were to place the 138 kV and 345 kV lines on the same right-of-ways or on the same
52 structures. He claims that AIC has not clearly explained whether it considered combining
53 the 138 kV and 345 kV transmission line projects for either planning or construction
54 purposes.

55 **Q. What is the Sidney to Rising 345 kV line project?**

56 A. This project is a Midwest ISO ("MISO") Multi Value Project (MVP). It is
57 described in the MISO MVP Portfolio Analysis Full Report. The project consists of
58 approximately 27 miles of 345 kV line between the AIC-owned Sidney and Rising
59 substations. It is expected to promote wind generation moving from the west to the east
60 into Indiana. It will mitigate constraints by keeping the power on the 345 kV system
61 rather than pushing it into the 138 kV system at the Rising Substation, which causes
62 overloads on the Rising transformer and nearby 138 kV lines supplied from Rising. This
63 project will mitigate one bulk electric system NERC Category A thermal constraint, one
64 NERC Category B constraint and three NERC Category C constraints.

65 **Q. Has MISO approved the Sidney to Rising 345 kV line project?**

66 A. MISO board of directors unanimously approved the MTEP11 Appendix A which
67 contains seventeen Multi Value Projects on December 8, 2011. The Sidney to Rising 345
68 kV line is included in the Multi Value portfolio.

69 **Q. In conducting its cost benefit analysis related to Sidney to Rising 345 kV line,
70 did MISO assume the Bondville 138 kV Transmission Line was in service?**

71 A. Yes. The Southwest Campus to Bondville 138 kV line was included in the
72 models used to evaluate the proposed Multi Valued Projects.

73 **Q. What does it mean for a project to have MISO approval?**

74 A. Board of director approval makes the project a candidate for cost sharing among
75 MISO customers. The costs of the Multi Value Projects will have a uniform 100 percent
76 regional allocation based on withdrawals and will be recovered from regional customers
77 (not just Illinois) through a monthly energy usage charge. In other words, the cost of a
78 Sidney Rising 345 kV line would be recovered from a broader base of customers than
79 AIC's customers. The cost of the Transmission Line, by contrast, will be recovered from
80 AIC customers only.

81 **Q. Did AIC consider the Sidney to Rising 345 kV line project in its planning for
82 the proposed Transmission Line in this case?**

83 A. Yes. In the January 2012 Champaign Area Transmission Assessment study,
84 Ameren Exhibit 1.20, the Sidney to Rising 345 kV line was included in the all the 2021
85 summer power flow models.

86 **Q. Could both the 138 kV and 345 kV lines be placed on the same right-of-ways**
87 **or on the same structures?**

88 A. Yes. As discussed by Mr. Murbarger, AIC would be willing to construct the
89 Transmission Line on structures that could accommodate a future 345 kV line if so
90 ordered by the Commission.

91 **Q. From a planning perspective, what is your view of combining two lines on**
92 **one route?**

93 A. Of course, having the two lines share a route would depend on the Commission
94 approving such a shared route when authorizing a future 345 kV line. I believe this is
95 feasible and do not believe that any planning criteria would likely be violated, based on
96 current information. However, there are reliability concerns with putting two
97 transmission lines in the same corridor. Having two lines in the same proximity increases
98 the probability that the adjacent lines will be impacted by the same outage event. This is
99 especially crucial in instances where the multiple lines support a common load pocket.
100 There are situations where transmission lines must share common towers or common
101 corridors through congested areas or to circumvent natural barriers; however, where
102 feasible, it is desirable to separate the lines as much as possible.

103 Also there are concerns about scheduling maintenance on common tower circuits.
104 To perform maintenance on one circuit both circuits must be removed from service. For
105 these conditions, the system operator will require that there will be no criteria violations
106 for the next contingency. This makes maintenance scheduling difficult even at off-peak
107 load levels.

108 I would also point out that the need drivers of this project and a Sidney Rising 345
109 kV line are very different. The 138 kV Transmission Line is needed to support local
110 voltage while the Sidney to Rising 345 kV line is needed to support transfers of
111 generation across the system. While the Sidney to Rising 345 kV line does provide
112 support to the local Champaign area load, this support alone does not represent the entire
113 justification for the line.

114 **Q. Mr. Rockrohr suggests that there could be possible costs savings if both the**
115 **138 kV and 345 kV lines are placed in the same right-of-ways or on the same**
116 **structures – i.e. on the same route. Do you agree?**

117 A. Costs savings may be possible when considering the total cost of the two projects
118 in aggregate. Since the 138 kV Transmission Line has an earlier in-service date,
119 however, there would be higher construction costs for building the proposed
120 Transmission Line to accommodate a potential future 345 kV line (though potentially
121 lower construction costs for completing the Sidney to Rising 345 kV line). Since the
122 Transmission Line is not a candidate for MISO cost sharing, this could ultimately place
123 more financial burden on AIC customers. For example, constructing three miles of dual
124 circuit structures from the Bondville Substation to the point where the primary route turns
125 east, would increase the cost of the Transmission Line by an additional \$6 million. The
126 ability to allocate the costs of dual circuit structures to the MISO rate-base is not a
127 certainty at this point. Thus, AIC customers might disproportionately bear cost of adding
128 dual circuit structures.

129 **Q. Has AIC ever performed a routing study of a future Sidney to Rising 345 kV**
130 **line?**

131 A. Yes, however, the study is outdated. When the Sidney to Rising 345 kV line was
132 first proposed in the 1970's a routing study was completed; however, there have been
133 many developments in the Champaign area that would demand a new routing study. At
134 this point, it is unknown how much of the original route would be deemed to be
135 acceptable under the current routing evaluation process and right-of-way requirements.

136 **Q. Did AIC acquire rights-of-way for a potential Sidney to Rising 345 kV line?**

137 A. Yes. Much of the right-of-way along the original 345 kV line route was acquired
138 in the 1970s. This existing corridor could be considered in future routing studies for
139 building the Sidney to Rising 345 kV line. However, I would note that there are now a
140 number of concerns with use of this route for a 345 kV line. The standard width of right-
141 of-way has increased from 132 feet to 150 feet for 345 kV lines, requiring AIC to obtain
142 additional right-of-way. Also it has come to AIC's attention that several land owners
143 have built structures on these easements. These issues would have to be addressed if a
144 Sidney to Rising 345 kV line were built on this route.

145 **Q. What do you conclude?**

146 A. AIC is willing to build the Transmission Line using structures that would
147 accommodate a future 345 kV line if the Commission so orders. Certainly in other cases
148 transmission lines must share common towers or corridors due to existing infrastructure
149 or natural barriers. In directing that dual circuit structures be used, however, I believe the

150 Commission should be cognizant of the preference, from a reliability and maintenance
151 scheduling perspective, to keep transmission lines on separate towers and corridors.

152 **Q. Mr. Rockrohr also states that he does not know if the 138 kV line will still be**
153 **necessary if AIC first built the Sidney to Rising 345 kV line. Please respond.**

154 A. A Sidney Rising 345 kV line would not be, by itself, sufficient to address the
155 voltage collapse risk I discussed in my direct testimony. The base case model used in the
156 Champaign Area Transmission System Study included the Sidney to Rising 345 kV line.
157 With this line in service the Champaign Area load is still subject to voltage collapse
158 under multiple contingency conditions as discussed in Section E.4 of Exhibit 1.20.
159 Therefore an additional 138 kV line (the Transmission Line) is still needed to mitigate
160 this condition even if the Sidney to Rising 345 kV was in service.

161 **Q. Is routing the Sidney-Rising line through the Southwest Campus Substation**
162 **and adding a 345/138 kV transformer there a viable alternative as suggested by Mr.**
163 **Rockrohr (p. 12)?**

164 A. There are numerous shortcomings associated with this mitigation option. There is
165 not enough room at the Southwest Campus substation to accommodate the installation of
166 a 345/138 kV transformer. Building the Transmission Line provides a second supply to
167 both the Southwest Campus Substation and the Bondville Substation. If the second
168 supply to Southwest Campus Substation were provided via extension of a 345 kV line
169 from the Sidney-Rising 345 kV line, a similar arrangement would be needed to provide a
170 second supply to Bondville Substation. That would require another 345 kV breaker
171 station in the Sidney-Rising 345 kV line, a 345 kV line to Bondville Substation, and a

172 345/138 kV transformer at Bondville Substation. The Existing Distribution Line could
173 not be utilized and therefore additional right-of-way would have to be obtained through a
174 very narrow corridor. This routing change may also change the status of the Sidney to
175 Rising 345 kV line as a regional project to a local project and jeopardize the cost sharing
176 aspect of the project, therefore placing more financial burden on AIC customers. AIC
177 would also expect more resistance to a higher voltage line being constructed near
178 residential and commercial developments. The target in-service date for the Sidney-
179 Rising 345 kV line is 2016. There would therefore be a delay associated with relying on
180 a connection to the Sidney-Rising 345 kV line to provide support for the 138 kV
181 Southwest Campus Substation, which would degrade the reliability for the area.

182 **Q. Describe generally Mr. Rockrohr's concern with the project options AIC has**
183 **identified in its Petition.**

184 A. Mr. Rockrohr is concerned that AIC's proposed alternate route cost is greater than
185 the cost of each of AIC's mitigation options set forth in the Champaign Area
186 Transmission System Study.

187 **Q. Is his concern warranted?**

188 A. No. Mr. Rockrohr is comparing the cost of AIC's alternate route in this case,
189 which AIC was required by statute to develop, with the costs of the options AIC
190 considered to mitigate the risk of voltage collapse in the Champaign area in 2015. As
191 Ameren Exhibit 1.20 shows, AIC has evaluated the options to mitigate voltage collapse
192 in the Champaign area. It is important to recognize that AIC's proposed mitigation option
193 – i.e. the Transmission Line - was identified as the best and least cost alternative to

194 address the voltage collapse issue in the Champaign area, as discussed in the Champaign
195 Area Transmission System Study (and Mr. Rockrohr admitted it is the least cost of the
196 mitigation options in response to data request AIC-ICC 1.07). The selection of the
197 preferred option was based on several aspects, including but not limited to: capital cost
198 estimates, constructability constraints, availability of existing facilities and right-of-ways
199 and the potential for meeting long-term growth as discussed in Section A of Exhibit 1.20.
200 In short, dollar cost was not the sole basis for picking the preferred mitigation option.

201 Selection of another mitigation project proposed in the Champaign Area
202 Transmission System Study would not deliver the best solution to the voltage collapse
203 issue and could require the addition of a second 138 kV line as part of the solution. By
204 contrast, the mitigation option selected by AIC produced the best solution over the long
205 term. The fact that the dollar amounts associated with the other mitigation options are
206 less than the alternate route cost in this case does not mean those mitigation options are
207 appropriate from the perspective of best meeting the Champaign area's service needs. In
208 addition to being least cost, the selected mitigation option is preferable for other reasons.
209 For example, three of the other four transmission options require construction of a second
210 138 kV line, since a second source would be needed to supply both the Bondville and
211 Southwest Campus substations by 2021. Although the need for a second source to
212 Bondville was not identified for the Southwest Campus to Sidney option by 2021, it
213 would likely be needed within a few years thereafter. Construction of a second Bondville
214 to Rising 138 kV line could result in the placement of the three separate lines on the same
215 properties. Moreover, there are additional long term costs associated with the four
216 mitigation options not selected by AIC that were not included in the project option costs

217 shown in Ameren Exhibit 1.20. Since the rejected options did not provide for an
218 additional source in the vicinity of the I-57-Curtis Road interchange, a new 69 or 138 kV
219 line may have to be constructed south from Bondville or west from Windsor to meet
220 future load growth. If those costs were reflected in the other mitigation options, the costs
221 of those options would increase.

222 Alternative routes were only developed for the preferred mitigation option, and
223 not for the other options considered in the Champaign Area Transmission System Study.
224 No siting study has been completed to determine what environmental, societal,
225 geographical or other barriers might be associated with the other mitigation options. Also
226 the options have different terminals and thus would constitute a different line than the
227 proposed Transmission Line. It is possible that, were routes to be studied and designed
228 for some other mitigation project option, those routes would cost as much or more than
229 the alternate route proposed for the Transmission Line. Thus one cannot compare the
230 costs of preferred and alternate routes developed for the selected plan with the costs of
231 the other project options.

232 **Q. Please discuss further the purpose of the study in Ameren Exhibit 1.20.**

233 A. The purpose of the study was to develop a comprehensive long-term transmission
234 plan for the Champaign area. AIC evaluated five transmission mitigation options to
235 address the need for system reinforcement as discussed in Ameren Exhibit 1.20. Based
236 on the study, AIC selected the preferred mitigation option and proceeded with route
237 design and siting analysis. Each of the mitigation plans presented in Exhibit 1.20 consists
238 of several projects. Projects vary by location, classification, in-service date or need

239 driver. Each of the mitigation plans consists of both transmission and distribution
240 projects. The in-service date also varies between the projects.

241 **Q. How does AIC calculate the cost of a mitigation project?**

242 A. The planner defines the scope of the project. The planner would specify the
243 terminals, the capacity and timing for a new transmission line. The design team develops
244 estimates for each component based on standard design specifications and costs. For
245 example, they would determine the specific route, length of wire, number and type of
246 poles, connectors, insulators, substation equipment needed and then using standard
247 software compute the capital, labor and financing costs of the project. The transmission
248 line construction component of the mitigation option costs typically reflects the shortest
249 distance between terminals, i.e., the "best case" scenario. The mitigation option costs do
250 not reflect the results of any routing siting analysis or public participation process results,
251 which may end up requiring longer routes for a project than those reflected in a particular
252 mitigation option.

253 **Q. What happens next from a planning perspective?**

254 A. Once the study is completed and approved by management, the design group
255 performs a detailed engineering study that includes the assessments of potential routes
256 and public informational meetings.

257 **Q. How does AIC calculate the cost of a route alternative?**

258 A. The route costs are determined based on the routes found most appropriate
259 through the detailed engineering study and public participation process. Typically the
260 only difference in cost between the preferred and alternate routes will be the difference in

261 transmission line costs resulting from different line lengths. The costs at the terminal
262 substations on either end are usually the same regardless of the route. In this case the
263 substation costs would be slightly lower for the alternate route since there would be no
264 changes at the Windsor Substation. Transmission line costs could vary due to length,
265 terrain, soil conditions, turns, obstacles requiring taller poles, etc.

266 **Q. Why is it inappropriate to compare the estimated cost of an individual route**
267 **alternative to the estimated cost of a mitigation project?**

268 A. The two costs are produced by different processes and are used for different
269 purposes. The mitigation option costs in Exhibit 1.20 are based on planning estimates
270 and include a number of projects, as I discussed above. These costs are used for the
271 planning purpose of comparing mitigation options and typically use a "best case"
272 scenario for a route. The alternate route costs, which are typically driven primarily by the
273 transmission line costs, are based on detailed route design and siting studies and the
274 results of the public participation process. These costs reflect the "realities on the
275 ground," as it were – actual routing constraints and public preference for where the route
276 should go. They reflect construction cost estimates, not planning estimates. The
277 alternate route costs are intended to guide the Commission in selecting the least cost
278 *route* of the two routes required to be proposed. They are not intended to be used to
279 select the least cost *mitigation option* – that is the purpose of the planning estimate costs
280 set forth in Ameren Exhibit 1.20.

281 **Q. Could AIC perform a detailed evaluation of another mitigation option for**
282 **Champaign and still have the project in service by 2015?**

283 A. No. However, such an evaluation is not needed, because, as I discussed above,
284 AIC has selected the best mitigation option from the options in the Champaign Planning
285 Study.

286 **Q. What would be the result of a delay in the in 2015 service date?**

287 A. As I explained in direct testimony, if the in-service date is delayed, the probability
288 of a voltage collapse and loss of the entire Champaign area load will increase since the
289 time the load will exceed the critical levels will be longer. In addition, AIC will not be
290 able to meet the criteria specified in its FERC-filed transmission planning criteria.

291 **Q. Mr. Rockrohr states that AIC plans to supply customers near the**
292 **intersection of I-57 and Curtis Road with a new substation. Is this accurate?**

293 A. AIC expects future load growth around the Curtis Road and I-57 interchange
294 based on the City of Champaign's development plans. Eventually a new distribution
295 substation will be needed in the vicinity of the interchange. AIC has not determined the
296 location or in-service date of the new distribution substation. However, it is not expected
297 that a new substation would be needed for several years.

298 **III. RESPONSE TO MR. HELTON**

299 **Q. Why does Mr. Helton believe the alternate route is the better option?**

300 A. Mr. Helton believes that building the line along the alternate route will satisfy
301 future growth need in the southern area of Savoy.

302 **Q. Doesn't this project already address this need?**

303 A. Yes. The Savoy area is served from the 69 kV system via the Southwest Campus
304 Substation from the north and the Tuscola Substation from the south. The proposed
305 Transmission Line will improve the reliability of the source from the Southwest Campus
306 Substation, irrespective of which route is selected.

307 **Q. Does the alternate route better address the future electric demand in the**
308 **south Savoy area than the primary route, as Mr. Helton's testimony suggests?**

309 A. No. Since the Savoy area is served from the 69 kV system, the location of the
310 138 kV line is immaterial to the meeting their load requirements.

311 **Q. Does AIC have any plans for future projects that will also address the need to**
312 **accommodate for growth south of Savoy?**

313 A. No. AIC has no plans to build a bulk supply substation in the Savoy area that
314 would be served from the 138 kV system. The long-term plan is to continue to serve the
315 Savoy load via the 69 kV system.

316 **Q. From a planning perspective, is there any validity to his assertions?**

317 A. Transmission system projects are generally pursued to serve overall growth in
318 large load pockets such as the Champaign or Decatur areas. Distribution substations are
319 usually located close to customer loads. Typically bulk substations are built near
320 transmission lines and then connected to the distribution substations via subtransmission
321 lines. Short extensions of the transmission line may be required depending on the
322 availability of adequate sites for these bulk substations. Therefore it is not necessary to
323 build transmission lines near individual loads. The exception would be large industrial

324 loads such as steel mills and ethanol plants which may be directly connected to the
325 transmission system.

326 **IV. CONCLUSION**

327 **Q. Does this conclude your prepared rebuttal testimony?**

328 **A. Yes, it does.**