

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN TRANSMISSION COMPANY OF ILLINOIS)

Petition for a Certificate of Public Convenience and)
Necessity, pursuant to Section 8-406.1 of the)
Illinois Public Utilities Act, and an Order pursuant)
to Section 8-503 of the Public Utilities Act, to)
Construct, Operate and Maintain a New High)
Voltage Electric Service Line and Related Facilities)
in the Counties of Adams, Brown, Cass,)
Champaign, Christian, Clark, Coles, Edgar, Fulton,)
Macon, Montgomery, Morgan, Moultrie, Pike,)
Sangamon, Schuyler, Scott and Shelby, Illinois)

Docket No. 12-0598

Rebuttal Testimony of

James R. Dauphinais

On behalf of

Moultrie County Property Owners ("MCPO")

April 12, 2013



12 My silence with regard to any other portion of Ms. Burns direct testimony, or
13 the direct testimonies of the Illinois Commerce Commission (“ICC” or “Commission”)
14 Staff or other intervenors in this proceeding, should not be taken as an endorsement
15 of any position that the ICC Staff or intervenors have taken in this proceeding.

16 **Q HAS THE DIRECT TESTIMONY OF ICC STAFF AND INTERVENORS WITH**
17 **RESPECT TO THE PANA TO KANSAS PORTION OF THE ILLINOIS RIVERS**
18 **PROJECT (“IRP”) PROVIDED ANY NEW INFORMATION THAT WOULD CHANGE**
19 **YOUR DIRECT TESTIMONY CONCLUSIONS OR RECOMMENDATIONS?**

20 A No. I continue to stand by my direct testimony conclusions and recommendations.

21 **Q PLEASE SUMMARIZE MS. BURNS’ TESTIMONY WITH REGARD TO “SHORT**
22 **SPANS.”**

23 A Ms. Burns testifies that the MCPO Mt. Zion to Kansas alternative route uses eight (8)
24 “short spans” of 0.25 miles or less. Among the claims she makes is that the “short
25 spans” require additional poles.

26 **Q HOW DO YOU RESPOND?**

27 A The term “span” has a very specific meaning in the industry. It is the distance
28 between two transmission line structures. It is not the distance of a route segment
29 between two right angle structures, which appears to be how Ms. Burns is using the
30 term.

31 Ameren Transmission Company of Illinois (“ATXI”) at ATXI Exhibit 7.0, page
32 3, line 57 identified the typical span length for the IRP as approximately 700 feet or
33 0.133 miles. This is far shorter than 0.25 miles. Thus, the eight route segments

34 between right angle structures that Ms. Burns identified as “short spans” do not
35 necessarily involve a significantly shorter than typical distance between transmission
36 structures. In fact, only one of the eight route segments in question would likely
37 involve an additional transmission line structure beyond those that would otherwise
38 be required. This specific route segment has a length approximately 430 feet. This
39 distance, being significantly shorter than 700 feet, would likely cause the need for an
40 additional structure beyond that which would otherwise be necessary.

41 The remaining seven of the eight route segments are all approximately
42 1,200 feet to 1,400 feet in length. While they will each likely need a tangent
43 transmission structure in their middle, that will not likely increase the total number of
44 structures needed because the resulting span lengths of approximately 600 to
45 700 feet are not much less than the ATXI-identified typical span distance of 700 feet.

46 **Q WILL THE RIGHT ANGLE TURNS ASSOCIATED WITH THE EIGHT ROUTE**
47 **SEGMENTS REQUIRE EXPENSIVE HEAVY TURNING ANGLE STRUCTURES?**

48 A Yes. However, this has already been taken into consideration in the cost estimates
49 for the MCPO Mt. Zion to Kansas alternative route that I have developed and
50 presented in MCPO Exhibit 1.4. These cost estimates were also provided to PDML in
51 response to discovery on March 20, 2013.

52 As shown in MCPO Exhibit 1.4, I have estimated the cost of the MCPO Mt.
53 Zion to Kansas alternative route to be only \$2.1 million (or 1.3%) more expensive
54 than the estimated cost of the ATXI Mt. Zion to Kansas primary route.

55 **Q IS MS. BURNS' PROPERTY IN CLOSE PROXIMITY TO ANY OF THE EIGHT**
56 **ROUTE SEGMENTS SHE DESCRIBES AS BEING "SHORT SPANS?"**

57 A No. The farmland and homestead site in Unity Township that she identifies is located
58 over 2-1/2 miles from any of the eight route segments she describes as "short spans."
59 In addition, her homestead is located at least 1,000 feet away from any portion of the
60 MCPO Mt. Zion to Kansas alternative route.

61 **Q DOES THIS CONCLUDE YOUR REBUTTAL TESTIMONY?**

62 A Yes, it does.

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