

Docket No. 12-0598  
Response to ATXI's  
First Set of Data Requests to ICC Staff

ICC Person Responsible: Greg Rockrohr  
Title: Senior Electrical Engineer, Safety & Reliability Division  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Telephone: 217/524-0695

**REQUEST ATXI-ICC 1.04:**

At page 8, lines 159 – 170 of his direct testimony, Mr. Rockrohr discusses ATXI's ability to manage and supervise the Project. In this regard:

- a) Is it Mr. Rockrohr's position that AMS service personnel are not capable of managing or supervising the Project? If yes, explain the basis for Mr. Rockrohr's response.
- b) Explain what Mr. Rockrohr means by "ATXI will continue to exist."

**RESPONSE:**

- a) No
- b) Mr. Rockrohr's testimony states: "...I would encourage ATXI in its rebuttal testimony to include additional information about its structure, including but not limited to succession planning information, in order to demonstrate that ATXI will continue to exist and be able to complete the Illinois Rivers Project even if Ms. Borkowski leaves." Mr. Rockrohr recommends that ATXI demonstrate that its ability to complete the Illinois Rivers Project is not dependent upon the actions of one individual. Specifically, Mr. Rockrohr suggests that ATXI demonstrate to the Commission that ATXI would still operate as a public utility in Illinois and complete the Illinois Rivers Project if Ms. Borkowski were to leave.

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**REQUEST ATXI-ICC 1.05:**

Is Mr. Rockrohr aware of any Commission order in which the Commission has found that Ameren Services was unable to provide adequate management and supervision of transmission line construction? If yes, identify the order(s).

**RESPONSE:**

Staff objects to this data request as it is overly broad and unduly burdensome. Without waiving said objection, Mr. Rockrohr is aware of no such order.

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**REQUEST ATXI-ICC 2.08:**

Has ATXI demonstrated a market demand and need for additional transmission service and capacity?

**RESPONSE:**

Yes. Mr. Rockrohr finds that the analysis performed by MISO and explained by MISO witness Jeffery R. Webb in MISO Ex. 1.0, and the analysis performed by Analysis Group, Inc., and explained by ATXI witness Rodney Frame in ATXI Ex. 9.0 demonstrate a need for an additional transmission line to promote the development of an effectively competitive electricity market that operates efficiently.

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**REQUEST ATXI-ICC 2.09:**

Has ATXI demonstrated that the Illinois Rivers Project will promote the development of an effectively competitive electricity market?

**RESPONSE:**

Yes. See Mr. Rockrohr's response to ATXI-ICC 2.08.

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**REQUEST ATXI-ICC 2.17:**

Is it Mr. Rockrohr's testimony that in general the Commission must consider the possible routing of all potential 138 kV transmission lines that might connect to an applicant's proposed transmission facilities to determine whether the Project satisfies the criteria set forth in Section 8-406 of the Public Utilities Act, about which Mr. Rockrohr testifies? If the answer to the preceding question is yes, please identify the specific criteria that require such an analysis.

**RESPONSE:**

No. Mr. Rockrohr also notes that he testified about the criteria set forth in Section 8-406.1 of the Public Utilities Act.

**ATXI-JDL 3.05** Referring to the Direct Testimony of Lori Spangler, lines 72-73, Ms. Spangler states: “According to the Illinois Rivers Transmission Project website there may not be structures within the easement.” Does Ms. Spangler agree the Illinois Rivers Transmission Project website, [www.ilriverstransmission.com](http://www.ilriverstransmission.com), states: “Property owners will retain full use of the property within the easement, though structures may not be built or trees planted within the easement.”? If she does not so agree, explain the basis for her disagreement.

**RESPONSE:** Ms. Spangler agrees that the exact wording on the Illinois Rivers Transmission Project website states “Property owners will retain full use of the property within the easement, though structures may not be built or trees planted within the easement.”

**ATXI-JDL 3.26** Has the JDL Tower ever collapsed? If so, state the date of the collapse and the reason for the collapse, and produce any Documents reflecting the collapse.

**RESPONSE:** The JDL Tower has never collapsed.

**ATXI-JDL 3.27** Identify all residences, buildings, or other structures within a 500-foot radius of the JDL Tower.

**RESPONSE:** Within a 500-foot radius of the JDL Tower, there is one trailer that is apparently being used as a residence, a small wooden shed, eight fenced areas, the JDL transmitter building, a large metal barn, a small metal shed, a building formerly used as an office, and six poles.

**ATXI-JDL 3.28** Is any of the land within a 500-foot radius of the JDL Tower actively used for Christmas tree farming purposes by Dahnke's Pine Patch?

**RESPONSE:** Yes. There is land within a 500-foot radius of the JDL Tower which is actively used for Christmas tree farming purposes by Dahnke's Pine Patch.

**ATXI-JDL 3.29** Are there any roads within a 500-foot radius of the JDL Tower?

**RESPONSE:** Yes, North 1030<sup>th</sup> Street is within a 500-foot radius of the JDL Tower.

**ATXI-JDL 3.31** Does Ms. Spangler agree the potential for collapse of the JDL Tower exists whether or not the Project is constructed? If her response is anything other than an unqualified “yes,” explain the basis for her response and produce any Documents Ms. Spangler relied on in formulating her response.

**RESPONSE:** Ms. Spangler agrees the potential for collapse of the JDL Tower exists whether or not the Project is constructed.

**ATXI-JDL 4.04** Identify any publications, presentations or studies that Mr. Ellis has prepared on the planning or design of transmission lines, and for each identify all entities who provided any funding for such publication, presentation or study.

**RESPONSE:** Mr. Ellis has not prepared any publications, presentations or studies on the planning or design of transmission lines.

**ATXI-JDL 4.05** Identify any electrical engineering organizations of which Mr. Ellis is an active member.

**RESPONSE:** Mr. Ellis does not belong to any electrical engineering organizations.

**ATXI-JDL 4.07** Identify any transmission power lines that Mr. Ellis has designed.

**RESPONSE:** Mr. Ellis has not designed any transmission power lines.

**ATXI-JDL 4.08** Identify any transmission power line route evaluation and siting analyses that Mr. Ellis has conducted.

**RESPONSE:** Mr. Ellis has not conducted any transmission power line route evaluation or siting analyses.

**ATXI-JDL 4.19** Does Mr. Ellis expect the JDL Tower to collapse? If the response is anything other than an unqualified “no,” explain the basis for Mr. Ellis’ response and state the date Mr. Ellis anticipates the JDL Tower to collapse.

**RESPONSE:** No, Mr. Ellis does not expect the JDL Tower to collapse.

**ATXI-JDL 4.23** Does Mr. Ellis agree there are buildings within a 500-foot radius of the JDL Tower? If the response is anything other than an unqualified “yes,” explain the basis for Mr. Ellis’ response and produce any Documents Mr. Ellis reviewed in formulating his response. If the response is an unqualified “yes,” identify the buildings Mr. Ellis believes are within a 500-foot radius of the JDL Tower.

**RESPONSE:** Yes. The buildings within a 500-foot radius of the JDL Tower are the JDL transmitter building, a residential trailer, a small wooden shed, a large metal barn, a small metal shed and a building formerly used as an office.

**ATXI-JDL 4.24** Does Mr. Ellis agree there is a Christmas tree farm within a 500-foot radius of the JDL Tower? If the response is anything other than an unqualified “yes,” explain the basis for Mr. Ellis’ response and produce any Documents Mr. Ellis reviewed in formulating his response.

**RESPONSE:** Yes, there is a Christmas tree farm within a 500-foot radius of the JDL Tower.

**ATXI-JDL 4.25** Explain, in Mr. Ellis' opinion, the potential consequences if the JDL Tower were to fall on any building identified in the response to 4.23 or on the Christmas tree farm identified in the response to 4.24.

**RESPONSE:** If the tower were to fall on a building, the roof and possibly more of the building would be destroyed.

**ATXI-JDL 4.26** Does Mr. Ellis agree the JDL Tower could collapse whether or not the Primary Route is constructed? If the response is anything other than an unqualified “yes,” explain the basis for Mr. Ellis’ response and produce any Documents Mr. Ellis reviewed to formulate his response.

**RESPONSE:** Yes, Mr. Ellis agrees the JDL Tower could collapse whether or not the Primary Route is constructed.

**ATXI-JDL 4.57** Has Mr. Ellis performed any empirical studies or analyses that support his opinion it is “likely” any radio frequency radiation from corona discharge or arcing will cause noise to JDL Broadcasting, Inc.’s sensitive equipment? (JDL Ex. 2.2, p. 1.) If so, produce a copy of any such study or analysis.

**RESPONSE:** No.

**ATXI-MCPO 4.15**

Is Mr. Dauphinais aware of any reliability concerns associated with co-location of electric transmission lines? If the answer is yes, explain what such concerns are, and produce all Documents Mr. Dauphinais relied on to support his response.

**Response:**

Please see the response to Data Request ATXI-MCPO 4.14. In addition, Mr. Dauphinais would note that co-location of electric transmission lines on common structures can introduce a new NERC Standard TPL-003-0a Category C.5 event. Powerflow and stability analysis would be required to ensure the newly introduced NERC Category C.5 event does not introduce a new reliability problem.

**ATXI-STPL 2.28** State whether any studies or analyses were performed by Mr. David Bush or Stop the Power Lines Coalition, or whether Mr. Bush had any studies or analyses performed on his behalf, concerning the effects of lime dust on electric transmission lines. If such studies or analyses were performed, provide such studies and all Documents relating to or relied upon in conducting such studies.

**RESPONSE:** Mr. Bush has not authorized any studies or analyses concerning the effects of lime dust on electric transmission lines.

**ATXI-STPL 3.03** Referring to his Direct Testimony, line 106, has Mr. Bush prepared any cost study or analysis that support his opinion the cost of line operations and maintenance will be increased by the continual presence of lime dust? If so, produce a copy of any such study or analysis.

**Response:** Mr. Bush has not prepared any cost study or analysis for this project that support his opinion that the cost of line operations and maintenance will be increased by the continual presence of lime dust.

**ATXI-STPL 3.04** What knowledge or evidence does Mr. Bush have that the projected costs for the Primary Route as presented by ATXI in this proceeding do not include increased costs for line operations and maintenance due to the proximity of the Primary Route to quarry mining operations?

**Response:** None.

**ATXI-STPL 3.08** Is Mr. Bush aware of any federal or state laws, rules, or regulations or of any limestone mining industry standards that pertain to the proximity of limestone mining operations to a property line? If so, identify any such federal or state laws, rules, or regulations or of any limestone mining industry standards.

**Response:** No.

**ATXI-STPL 3.09** Is Mr. Bush aware of any federal or state laws, rules, or regulations or of any limestone mining industry standards that pertain to the proximity of the “blasting” attendant to quarry operations? If so, identify any such federal or state laws, rules, or regulations or of any limestone mining industry standards.

**Response:** No.