

**Ameren Transmission Company of Illinois'  
Response to MCPO Data Requests  
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, 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 Various Counties in the State of Illinois.  
Data Request Response Date: 5/9/2013**

MCPO 15.02

Please refer to Mr. Kramer's Rebuttal Testimony (ATXI Exhibit 11.0) at lines 470 through 538 and Mr. Frame's Direct Testimony (ATXI Exhibit 9.0) at lines 285 through 378.

- a) Please provide a complete copy of all analyses performed by, or on behalf of, Ameren Services or AIC or ATXI that demonstrates that the Illinois Rivers Project ("IRP") constructed with the Oreana 345/138 kV Reinforcement in place of ATXI's proposed Mt. Zion substation will result in:
  - i) a lower power import capability in MW into the combined ATXI and AIC transmission system than the IRP constructed with ATXI's proposed Mt. Zion substation;
  - ii) a lower power transfer capability in MW from the portion of the MISO market footprint located north and west of the combined ATXI and AIC transmission system to the combined ATXI and AIC transmission system than the IRP constructed with ATXI's proposed Mt. Zion substation; and/or
  - iii) a lower power transfer capability in MW from the portion of the MISO market footprint located north and west of the combined ATXI and AIC transmission system to the portion of the MISO market footprint located south and east of the combined ATXI and AIC transmission system than the IRP constructed with ATXI's proposed Mt. Zion substation.
- b) Please provide a complete copy of all analyses performed by, or on behalf of, Ameren Services or AIC or ATXI that examines a full year of system operation using a production cost model (such as PROMOD) that demonstrates the benefits identified in ATXI Exhibits 9.3 through 9.6 for the IRP constructed with ATXI's proposed Mt. Zion substation would not also be provided for the IRP constructed with the Oreana 345/138 kV Reinforcement in place of ATXI's proposed Mt. Zion substation.

**OFFICIAL FILE**

**RESPONSE**

Response to subpart a) only:  
Prepared By: Dennis D. Kramer  
Title: Director, Transmission Policy and Planning  
Phone Number: 314 554 2238

A.L.C.C. DOCKET NO. 120598  
 MCPO CR Exhibit No. 3  
 Witnesses \_\_\_\_\_  
 Date 5-15-13 Reporter UP

a)

- i) ATXI has not performed the described analysis. ATXI has not had such an analysis performed on their behalf. Furthermore, ATXI does not think such analysis is warranted because Illinois Rivers Project constructed with the Oreana 345/138 kV Reinforcement in place of ATXI's proposed Mt. Zion substation is inferior from a reliability standpoint and more costly to Ameren Illinois ratepayers.
- ii) See response to subpart a) i).
- iii) See response to subpart a) i).

**Response to subpart b) only:**

**Prepared By: Rodney Frame**

**Title: Affiliate, Analysis Group, Inc.**

**Phone Number: 202-530-3991**

- b) ATXI has not performed the described analysis. ATXI has not had such an analysis performed on their behalf.