

**REBUTTAL TESTIMONY ON REHEARING
OF
GREG ROCKROHR**

**ENERGY ENGINEERING PROGRAM
SAFETY AND RELIABILITY DIVISION
ILLINOIS COMMERCE COMMISSION**

**Ameren Transmission Company of Illinois
Docket No. 12-0598 (Rehearing)**

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.

December 2, 2013

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1 **Introduction**

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

3 A. My name is Greg Rockrohr. My business address is 527 East Capitol Avenue,
4 Springfield, Illinois 62701.

5 **Q. Are you the same Greg Rockrohr who previously provided direct testimony**
6 **on rehearing in this docket?**

7 A. Yes. My prepared direct testimony on rehearing, Staff Ex. 2.0, was filed on
8 November 13, 2013.

9 **Q. What is the purpose of your rebuttal testimony in this rehearing?**

10 A. My rebuttal testimony responds to the direct testimony on rehearing of ATXI
11 witnesses Dennis Kramer, Jeffery Hackman, and Donell Murphy. My rebuttal
12 testimony may also reference the direct testimony and positions of other
13 intervening parties. If I exclude discussion of a specific ATXI or intervener
14 position from my rebuttal testimony, it should not be construed that I agree with
15 the position.

16

17 **Meredosia to Pawnee Segment Route Alternatives**

18 **Q. Has ATXI's or any other party's direct testimony in rehearing convinced**
19 **you that ATXI's Alternate Route should be used for the Meredosia to**
20 **Pawnee segment?**

21 A. No. It remains my position that the alternative route initially presented by
22 MSCLTF that is supported by MSSCLPG is superior to ATXI's Alternate route for
23 the Meredosia to Pawnee segment. With Table 1 on page 7 of ATXI Ex. 3.0

24 (RH), Ms. Murphy identifies the route initially presented by MSCLTF as the
25 MSSCLPG Route. Ms. Murphy's Table 1 illustrates that the MSSCLPG Route is
26 equal to or superior to the ATXI Alternate Route for nearly all the criteria listed.
27 Even impacts identified as equal within the table, such as social and land use
28 impacts and visual impact, would actually favor the MSSCLPG Route simply
29 because there would be 21 fewer miles of transmission line causing those
30 impacts. Also worth mentioning is the fact that ATXI's use of the shorter and less
31 costly MSSCLPG Route for the Meredosia to Pawnee segment would cause the
32 Robinettes' route modification to ATXI's Alternate Route, and any disagreements
33 about that modification, to become irrelevant. The only entry in Ms. Murphy's
34 table that I disagree with is in the row labeled "Difficulty/cost of operation and
35 maintenance." Ms. Murphy's table appears to ignore the difficulty/cost of
36 operation and maintenance of 21 miles of extra transmission line.¹

37 **Q. Why does ATXI object to using the shorter and less costly MSSCLPG**
38 **Route?**

39 A. Ms. Murphy explains that it is ATXI's preference that the proposed 345 kV
40 transmission line not parallel the existing 138 kV transmission line because other
41 route options are available.² Mr. Hackman explains his concern that, though
42 ATXI can construct the proposed transmission line parallel to existing lines, and
43 sometimes proposes to do so, "It is easier for both lines to go out, or to be taken
44 out, when they are close together."³ Mr. Hackman explains that, when ATXI

¹ Ms. Murphy's Table 1 on page 7 of ATXI Ex. 3.0 (RH) indicates a difference in length of 21 miles.

² ATXI Ex. 3.0 (RH), 9.

³ ATXI Ex. 2.0 (RH), 33.

45 proposes to parallel existing transmission lines, it does so because
46 environmental, societal, and land use issues outweigh the reliability, operations,
47 and maintenance concerns that result from constructing parallel lines in close
48 proximity.⁴ While I agree that the factors Mr. Hackman mentions should be
49 considered prior to finalizing transmission line routing, ATXI's testimony that it
50 opposes the MSSCLPG Route based upon a preference, or a unilateral weighing
51 of various factors, is not convincing. Installing the proposed 345 kV line parallel
52 to the existing 138 kV line, as MSSCLPG proposes, would substantially reduce
53 the length and cost of the project, and would cause the proposed transmission
54 line to affect fewer landowners.⁵ In addition, the MSSCLPG route and ATXI's
55 Alternate Route would equally comply with North American Electric Reliability
56 Corporation ("NERC") Reliability Rules.⁶ Even after reading ATXI's direct
57 testimony on rehearing, it appears to me that ATXI's opposition regarding the
58 MSSCLPG Route for no better reason than it parallels an existing 138 kV
59 transmission line appears to me to be inconsistent with ATXI's support for
60 paralleling existing transmission lines for other segments of the project. As an
61 example, ATXI supports paralleling not only an existing 138 kV line as part of the
62 MCPO stipulated route between Mt. Zion and Kansas, but also an existing 345
63 kV line for several miles north of Kansas, so that all three transmission lines
64 would be in close proximity.⁷ I do not understand ATXI's objection to using the
65 MSSCLPG Route, especially after reviewing Table 1 on pages 7 and 8 of ATXI

⁴ ATXI Ex. 2.0 (RH), 32-33.

⁵ ATXI Ex. 3.0 (RH), Table 1, 7-8.

⁶ Tr., May 15, 2013, 624.

⁷ Ameren Transmission Company of Illinois, Final Order, Appendix D, 5 (August 20, 2013).

66 Ex. 3.0 (RH), which compares the MSSCLPG Route and ATXI's Alternate Route
67 based upon the factors outlined in the Commission's Final Order.

68 **Q. With regard to Table 1 in ATXI Ex. 3.0 (RH), do you understand ATXI's entry**
69 **on page 8 that is labeled "Acceptance by parties in proceeding" to be**
70 **complete?**

71 A. No. ATXI entered into a stipulation with MSCLTF and FutureGen, so it is correct
72 that MSCLTF and FutureGen would accept the ATXI Alternate Route, as shown
73 in the left column of Table 1. However, regarding the column on the right, it is my
74 understanding that MSCLTF and FutureGen, plus intervener Pearce, would also
75 accept the MSSCLPG Route.⁸ The reason for my understanding is that MSCLTF
76 initially proposed the MSSCLPG Route. FutureGen plainly states that the
77 MSSCLPG Route (same as MSCLTF route) would substantially resolve its
78 concerns.⁹ The Pearce family proposed an alternative to ATXI's Primary Route
79 that exactly coincides with a portion of the MSSCLPG Route.¹⁰ Since Staff also
80 favors the MSSCLPG Route, it seems clear that more parties would accept the
81 MSSCLPG Route than would accept the longer, more costly ATXI Alternate
82 Route.

83 **Pawnee to Kincaid to Mt. Zion Connection**

84 **Q. ATXI witness Dennis Kramer provides testimony expressing concern about**
85 **potential problems and costs associated with the Commission's approval**

⁸ Staff BOE, 6.

⁹ MSSCLPG Cross Ex. 1.0 (May 16, 2013): FutureGen response to data request MSSCLPG-FutureGen 2.01.

¹⁰ ATXI Ex. 13.5 (Rev), 4.

86 **of a route connecting Pawnee to a Mt. Zion area substation via Kincaid.¹¹**

87 **Would you summarize Mr. Kramer's concerns?**

88 A. I understand Mr. Kramer to testify that the following five potential problems/costs
89 could occur if ATXI were to implement a Pawnee to Kincaid to Mt. Zion
90 connection:

91 1. Substation facilities at Kincaid might need to be modified.

92 2. AIC's customers would bear all the costs of the relocating AIC's transmission
93 facilities at Pana, rather than 7% of the cost.¹²

94 3. The Pawnee to Kincaid to Mt. Zion connection would require more time to
95 implement than ATXI's proposal, and therefore likely would not address the
96 Decatur area reliability issues that ATXI identified until 2018.

97 4. The Pawnee to Kincaid to Mt. Zion connection might create system conditions
98 that could overload the new 345/138 kV transformer that ATXI plans to locate
99 in the Mt. Zion/Decatur area.

100 5. The Pawnee to Kincaid to Mt. Zion connection would not improve the stability
101 of Coffeen and Kincaid power plants to the same extent as ATXI's proposed
102 connection through Pana.

103 **Q. How do you respond to Mr. Kramer's concern that the existing substation
104 facilities at Kincaid might need to be modified?**

105 A. I would agree with Mr. Kramer that modifications/additions at or near Kincaid
106 Substation would likely be required. Mr. Kramer's testimony at lines 332 to 356

¹¹ ATXI EX. 1.0 (RH), 5-9.

¹² ATXI Ex. 1.0, 8: ATXI witness Maureen Borkowski stated that Ameren Illinois' customers would bear approximately 7% of MVP costs.

107 makes it clear that ATXI and MISO have not fully vetted the option of providing a
108 Pawnee to Mt. Zion connection via Kincaid.¹³ Since Mr. Kramer indicates that
109 the existing multiple connections at the 345 kV ring bus at Kincaid is a
110 recognized existing concern,¹⁴ I would expect that MISO and PJM both would
111 embrace the study of a Pawnee to Kincaid to Mt. Zion connection as a potential
112 opportunity to remedy any existing negative operational characteristics caused
113 by the existing Kincaid ring bus. Indeed, in addition to the concerns that Mr.
114 Kramer expresses, Mr. Hackman discusses Special Protection Systems that
115 exist at Kincaid.¹⁵ Modifications at Kincaid could lead to the elimination of these
116 Special Protection Systems. I am concerned that by inflexibly focusing on
117 gaining expedited approval in this proceeding for the Pawnee to Pana to Mt. Zion
118 route segments that ATXI proposes to complete MISO Multi-Value Project #10
119 and #11, ATXI and MISO might fail to adequately consider an opportunity to also
120 provide a long-term solution for the existing Kincaid operating issues while
121 achieving the benefits of four of MISO's Multi-Value Projects at lower cost: a
122 solution that could provide substantial operational benefits for both MISO and
123 PJM.

124 **Q. How do you respond to Mr. Kramer's concern that AIC's customers will**
125 **have to bear the entire cost of relocation of AIC's transmission equipment**
126 **at Pana?**

¹³ Staff IB, 40.

¹⁴ ATXI Ex. 1.0 (RH), 14.

¹⁵ ATXI Ex. 2.0 (RH), 29.

127 A. I am surprised that ATXI is so confident that such relocation is necessary.
128 Previously, I submitted a data request to ATXI about its potential plans to
129 relocate AIC's existing equipment at Pawnee and Pana due to mining
130 subsidence, and I understood ATXI's response to indicate that ATXI had no
131 knowledge about AIC's equipment, and that AIC assets were not a part of this
132 docket.¹⁶ I do not understand why, now in rehearing, ATXI has suddenly become
133 not only concerned about the relocation of AIC's substation equipment that it
134 previously stated it knew nothing about, but is positive that a relocation of AIC's
135 facilities will be required. Without evidence of specific problems associated with
136 mining subsidence, I do not agree with ATXI that AIC and/or ATXI should
137 relocate existing facilities at Pana Substation simply because costs for doing so
138 would be shared throughout MISO. Relocation of AIC's existing transmission
139 equipment is very different from ATXI's proposal in its filing to install a new 345
140 kV bus and additional 345/138 kV transformer at Pana. Based upon ATXI's
141 response to Staff DR 2.14, it is my understanding that ATXI has no knowledge of
142 AIC's assets or that it would have any reason to relocate its existing facilities at
143 Pawnee and Pana.

144 **Q. How do you respond to Mr. Kramer's concern that the Pawnee to Kincaid to**
145 **Mt. Zion connection would likely not address the Decatur area reliability**
146 **issues that ATXI identified until 2018?**

147 A. I do not know whether a Pawnee to Kincaid to Mt. Zion connection could be
148 completed more quickly if necessary studies were given priority. In any case, if

¹⁶ ATXI response to Staff DR 2.14, included as Attachment A.

149 ATXI could not complete the Pawnee to Kincaid to Mt. Zion connection until
150 2018, and ATXI knows that in advance, it appears to me that ATXI could modify
151 the sequence of route segment construction that is indicated on ATXI Ex. 2.4.
152 Specifically, ATXI could consider constructing the segment that connects the new
153 Mt. Zion area substation to Kansas sooner in order to reinforce the Decatur
154 supply by 2016. In any event, ATXI's proposed new 345/138 kV substation in the
155 Decatur area, regardless of its exact location, will not provide the planned
156 reliability improvement to the Decatur area without AIC's 138 kV transmission
157 line connections, which will take time to design and construct, and which are not
158 part of this proceeding. As I explained in my direct testimony on rehearing, I
159 propose a substation site that would intercept existing 138 kV lines that supply
160 the Decatur area so that additional 138 kV lines would not be immediately
161 necessary.¹⁷

162 **Q. How do you respond to Mr. Kramer's concern that, due to the existing bus**
163 **configuration at Kincaid Substation, the Pawnee to Kincaid to Mt. Zion**
164 **connection might result in an overload of the 345/138 kV transformer**
165 **planned for the Decatur area?**

166 A. I have not independently conducted a power flow analysis, and do not know the
167 specific power flows that would cause the condition to which Mr. Kramer refers.
168 Even so, I have no reason to doubt Mr. Kramer's conclusion that overloads could
169 occur at the Mt. Zion area substation transformer because of an unplanned

¹⁷ Staff Ex. 2.0, 9-10.

170 opening of two breakers at the Kincaid ring bus.¹⁸ The modifications to the
171 existing 345 kV configuration at Kincaid Substation that I previously discussed
172 could alleviate this concern.

173 **Q. How do you respond to Mr. Kramer's concern that the Pawnee to Kincaid to**
174 **Mt. Zion connection would not improve the stability of Coffeen and Kincaid**
175 **power plants to the same extent as ATXI's proposed connection through**
176 **Pana?**

177 A. Mr. Kramer's explanation indicates to me that both the Pawnee to Kincaid to Mt.
178 Zion connection and the Pawnee to Pana to Mt. Zion connection that ATXI
179 recommends would improve stability of power plants, but that the Pawnee to
180 Pana to Mt. Zion connection would lead to a greater improvement.¹⁹ Mr. Kramer
181 did not indicate, and I do not know, whether both of these routes would provide
182 improvement adequate to eliminate MISO's concerns about instability at Coffeen,
183 as expressed in Mr. Webb's testimony that Mr. Kramer cites on page 8 of ATXI
184 Ex. 1.0 (RH). Furthermore, if ATXI uses the Option 3 substation site included
185 with my direct testimony, an existing 138 kV transmission line would connect the
186 existing Pana Substation to ATXI's proposed 345 kV transmission line, which
187 could potentially further improve stability of the power plants, especially
188 Coffeen.²⁰

¹⁸ ATXI Ex. 1.0 (RH), 11-12.

¹⁹ *Id.*, 8-9.

²⁰ Staff Ex. 2.0, Attachment A.

189 **Q. How can the Commission determine in this proceeding whether a Pawnee**
190 **to Kincaid to Mt. Zion connection is the least cost route for segments**
191 **between Pawnee and Mt. Zion?**

192 A. I do not know. Based upon the testimony of Mr. Kramer and Mr. Hackman, ATXI
193 needs to communicate and work with ComEd and PJM to complete studies
194 necessary to determine required modifications. ATXI should fully study the costs
195 associated with a Pawnee to Kincaid to Mt. Zion connection, and once cost
196 estimates to fully implement a Pawnee to Kincaid to Mt. Zion connection are
197 known, ATXI should compare those costs and benefits to its estimate for using a
198 Pawnee to Pana to Mt. Zion connection. I am concerned that ATXI and MISO
199 did not adequately study a Pawnee to Kincaid to Mt. Zion prior to ATXI's initial
200 filing in this docket. I understand that coordinating with another utility (ComEd)
201 that is a member of a different RTO (PJM) may require additional planning and
202 time. However, ATXI is proposing to take through condemnation the property of
203 many Illinois landowners and place large transmission towers on, and
204 transmission conductors across, it. Though I am not an attorney, it is my
205 understanding that ATXI must use the least cost route, and I do not know how
206 the Commission can reach a conclusion about the least cost route with any
207 confidence if it only has received some of the information that it needs. ATXI Ex.
208 1.6 indicates to me that constructing the Pawnee to Kincaid to Mt. Zion
209 connection would likely result in construction costs that are \$45.4 million lower
210 than the Pawnee to Pana to Mt. Zion connection (\$202.9 million – \$157.5
211 million), and would result in a line that is approximately 25 miles shorter. Of the

212 \$157.5 million associated with ATXI's cost for the Pawnee to Kincaid to Mt. Zion,
213 \$32.9 million is ATXI's estimate for AIC's cost to relocate existing Pana
214 Substation equipment, which, as I previously discussed, may not be necessary if
215 the Pawnee to Kincaid to Mt. Zion connection is used. \$88.3 million in cost
216 savings is significant, and some of this savings could potentially be used to
217 address existing operational issues at the Kincaid substation that Mr. Hackman
218 discusses.²¹ In summary, ATXI raises several potentially valid concerns
219 regarding use of a Pawnee to Kincaid to Mt. Zion connection, and repeatedly
220 stresses that cost sharing throughout MISO means ATXI could construct a more
221 costly project that actually costs Illinois customers less.²² Nonetheless, it
222 remains my opinion that the Pawnee to Kincaid to Mt. Zion connection potentially
223 represents a lower cost route, overall. In addition, I do not know how costs for
224 Kincaid modifications/upgrades that improve transmission system operations for
225 two RTOs would be allocated.

226 **ATXI's Proposed Substations**

227 **Q. Did ATXI provide additional information regarding its proposed substation**
228 **designs?**

229 A. Yes. Mr. Kramer provides useful information regarding potential designs for the
230 345 kV bus at ATXI's proposed substations, and ATXI's reason for preferring a
231 breaker-and-a-half arrangement.²³ In addition, Mr. Hackman provides useful
232 information regarding ATXI's proposed individual substation sites, along with

²¹ ATXI Ex. 2.0 (RH), 29.

²² ATXI Ex. 1.6 includes columns showing that after cost allocation to customers of other MISO participating utilities, Ameren Illinois' customers would bear 9% of most project costs. ATXI previously stated that Ameren Illinois' customers would bear approximately 7% of the cost. ATXI Ex. 1.0, 8.

²³ ATXI Ex. 1.0 (RH), 21-30.

233 diagrams showing overlays of breaker-and-a-half bus arrangements at the
234 existing and proposed sites.²⁴ Previously, I stated: "...it appears that, after
235 modifications, ATXI could terminate its 345 kV transmission line at AIC's existing
236 substations at Ipava, Kansas, Sidney, and Rising, rather than at additional
237 substations that ATXI proposes to construct."²⁵ While I do not understand why
238 ATXI waited until rehearing to provide clarifying information about its substations,
239 the updated information ATXI provided causes me to modify my prior
240 recommendation regarding several of ATXI's proposed substations.

241 **Q. What is your opinion regarding ATXI's plans for its proposed Ipava**
242 **substation site?**

243 A. I have not changed my opinion regarding Ipava. Instead of constructing an
244 entirely new substation as ATXI proposes, I continue to believe that ATXI can
245 and should terminate its proposed 345 kV transmission line at AIC's existing
246 Ipava substation. ATXI witness Mr. Kramer explains that a single ring bus
247 configuration would work well when no more than four connections are made to
248 the bus.²⁶ The Ipava substation will initially have three connections: (1) the
249 existing line to Duck Creek power plant; (2) the proposed line to Meredosia; and
250 (3) the existing 345/138 kV transformer. Mr. Kramer explains that ATXI plans to
251 construct an entirely new 345 kV substation (switchyard) at Ipava to provide
252 adequate space in the future for up to six 345 kV positions using a breaker-and-
253 a-half configuration. ATXI's plan would allow up to three additional 345 kV

²⁴ ATXI Ex. 2.0 (RH), 6-19.

²⁵ Staff Ex. 1.0, 3-4.

²⁶ ATXI Ex. 1.0 (RH), 23.

254 connections.²⁷ It remains my position that ATXI could instead terminate its single
255 new 345 kV transmission line using a 4-position ring bus at AIC's existing Ipava
256 Substation location. Doing so would provide a vacant position for a future 345 kV
257 termination, should a need arise, and the unnecessary expense and land
258 consumption resulting from a new and separate substation site would be avoided.
259 To be clear, I agree with Mr. Hackman that the physical area required for a 6-
260 position 345 kV breaker-and-a-half bus configuration would likely exceed the
261 available buildable area at the existing Ipava Substation,²⁸ but I find it to be
262 wholly unnecessary for ATXI to design for a 6-position breaker-and-a-half bus
263 configuration at Ipava. Instead, ATXI could position a less costly 4-position ring
264 bus in the available buildable space in and adjacent to AIC's existing Ipava
265 Substation. Again, doing so would still provide a spare 345 kV termination
266 position for future use.

267 **Q. What is your position regarding ATXI's plans for its proposed Kansas**
268 **substation site?**

269 A. Mr. Kramer explains that the Kansas substation will initially have six connections
270 to its 345 kV bus.²⁹ I do not object to ATXI's plans to expand AIC's existing
271 Kansas substation to accommodate a six position 345 kV bus with breaker-and-a
272 half configuration, as shown on ATXI Ex. 2.4 (RH) and ATXI Ex. 2.5 (RH).

273 **Q. What is your position regarding ATXI's plans for its proposed Sidney**
274 **substation site?**

²⁷ *Id.*, 27-28.

²⁸ ATXI Ex. 2.0 (RH), 9-10.

²⁹ ATXI Ex. 1.0 (RH), 29.

275 A. Mr. Kramer explains that the Sidney substation will initially have five connections
276 to its 345 kV bus.³⁰ I do not object to ATXI's plans to expand AIC's existing
277 Sidney substation to accommodate a six position 345 kV bus using breaker-and-
278 a half configuration, as shown on ATXI Ex. 2.6 (RH) and ATXI Ex. 2.7 (RH).

279 **Q. What is your position regarding ATXI's plans for its proposed Rising**
280 **substation site?**

281 A. Mr. Kramer explains that the Rising substation will initially have three
282 connections to its 345 kV bus.³¹ ATXI's plans to initially construct Rising using a
283 ring bus designed so that it can be easily modified to a breaker-and-a-half
284 configuration. Unlike at Ipava, ATXI was able to acquire adequate space
285 adjacent to AIC's existing Rising substation to accommodate a future 6-position
286 breaker-and-a-half configuration. Therefore, I do not object to ATXI's plans to
287 expand AIC's existing Rising substation to accommodate a future six position
288 345 kV breaker-and-a-half bus configuration, as shown on ATXI Ex. 2.8 (RH) and
289 ATXI Ex. 2.9 (RH).

290 **Q. Does this question conclude your prepared rebuttal testimony on**
291 **rehearing?**

292 A. Yes it does.

³⁰ *Id.*

³¹ *Id.*

Ameren Transmission Company of Illinois's
Response to ICC Staff 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: 12/27/2012

ENG 2.14

ATXI witness Jeffrey V. Hackman explains that ATXI's proposed Pawnee Substation and Pana Substation sites were selected after ATXI learned about and observed mine subsidence in the area caused by a roof-and-pillar mine. (ATXI Ex. 3.0 (Rev.) at 14-15.)

- a) Are AIC's existing substation at Pawnee and/or Pana in the area of observed mining subsidence discussed by Mr. Hackman?
- b) When were AIC's existing substations at Pawnee and Pana initially constructed?
- c) Historically, has AIC, Ameren Services, or ATXI determined that mining subsidence caused problems at AIC's existing substation at Pawnee or Pana? If yes, please identify and explain those problems. If no, please identify and explain any specific potential concerns associated with mining subsidence that caused ATXI to select alternative substation sites rather than sites that are adjacent to AIC's existing substations at Pawnee and Pana.

RESPONSE

Prepared By: Jeffrey V. Hackman

Title: Manager – Transmission Operations

Phone Number: 314-554-2839

- a) Yes
- b) ATXI has no knowledge of that and AIC's assets are not a part of this Docket.
- c) ATXI has no knowledge of problems AIC may have experienced. ATXI reviewed time-lapse evidence which showed subsidence and consulted with experts who counseled that the construction of a major Bulk Electric System facility on the old mine area was ill-advised without stabilization, and as discussed in ATXI Ex 3.0, a new site was preferable to stabilization.