

ILLINOIS COMMERCE COMMISSION

Docket No. 12-0598 (R)

REBUTTAL TESTIMONY

OF

MARY BURNS

Submitted on Behalf of the Coalition of Property Owners and Interested Parties in Piatt, Douglas
and Moultrie Counties, Channon Family Trust, and Identification of Channon Alternate Route

WITNESS IDENTIFICATION

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Q. Would you please state your name, address and basic background relevant to this proceeding?

A. My name is Mary Burns and my address is 10 Oakwood Dr., Springfield, Illinois. I am a member of the PDM intervenor group and am working with the Channon Family Trust intervenor group.

Q. Are you the same Mary Burns who presented direct testimony in this rehearing?

A. Yes, I am.

PURPOSE and SCOPE

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to respond to the direct testimony of Staff witness Greg Rockrohr and the Mt. Zion to Kansas routing options he notes at page 14 of his testimony.

ROUTE COMBINATIONS

Q. Did Staff introduce the concept of connecting its proposed route from Pawnee via Kincaid to Mt. Zion with the proposed routes from Mt Zion to Kansas?

A. Yes. Staff raised this issue (ICC Staff Exhibit 2.0, page 14, lines 291-303). Thus, a comparison of the Mt. Zion to Kansas proposed routes from the Staff proposed substation sites is

24 relevant. Staff notes that its proposed Pawnee to Mt. Zion route “meets up with ATXI’s Primary
25 Route for the Mt. Zion to Kansas segment directly south of the intersection of Henry Rd and E.
26 Andrews Street.” (ICC Staff Exhibit 2.0, p.14, 1.295-97). Staff notes that since ATXI’s
27 Alternate Route and MCPO’s alternate route MZK both meet up with ATXI’s Primary Route, all
28 or combinations of portions of any of these routes can be used to route the line on to Kansas.

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30 SUBSTATION SITES

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32 Q. Please identify the location of the Staff's preferred substation site.

33 A. The Staff Option 1 proposed site, which the Staff has indicated is its preferred site
34 (Channon-ICC 1.04), is located at the southeast corner of the intersection of Henry Road and E
35 Andrew Street in Macon County, Milam Township, section 34. (Notice and Identification of
36 Alternative Route from Pawnee to Mt. Zion through the Kincaid Substation Pursuant to
37 Commission Direction Dated October 2, 2013, Exhibit A, page 15)

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39 Q. Please identify the location of the ATXI proposed substation site.

40 A. The ATXI proposed site is located on Sulphur Springs Road in Macon County, Mt. Zion
41 Township, Section 17 and is located three-miles north and one and one-half miles west of the
42 Staff Option 1 site.

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44 Q. How would the Channon Hybrid Route connect to Staff's preferred Option 1 site?

45 A. The Channon Hybrid Route begins at Staff's preferred Option 1 site, so no additional
46 connection is necessary.

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48 Q. How would the MCPO alternate route MZK connect to Staff's preferred Option 1 site?

49 A. At its closest point, the MCPO route is three miles north of the Staff Option 1 site. The
50 MCPO route would have to connect to Staff's substation site by running from Sulphur Springs
51 Road three miles south on Henry Road (on ATXI's Primary Route).

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COMPARITIVE ANALYSIS

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LENGTH

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56 Q. From Staff's preferred Option 1 site, how does the Channon Hybrid Route compare in
57 length with the MCPO route?

58 A. The Channon Hybrid Route is substantially shorter. The Channon Hybrid Route, from
59 Staff's preferred Option 1 site to Kansas, is 61.2 miles. This is based on (1) the length of
60 ATXI's Primary Route from its proposed Sulphur Springs substation site to the point in Moultrie
61 County, East Nelson Township where ATXI's Primary and Alternate Routes intersect, which
62 ATXI estimates is 32.2 miles (Channon-ATXI DR 1.01(a)), (2) a reduction of that length by 5
63 miles, being the distance between the Sulphur Springs site and Staff's preferred Option 1 site, on
64 ATXI's primary route, and (3) the length of ATXI's Alternate Route from the intersection point
65 to the Kansas substation, which ATXI estimates is 34.0 miles (Channon-ATXI DR 1.01(b)). By
66 comparison, the MCPO route, from Staff's preferred Option 1 site to Kansas, is 70.7 miles. This
67 is based on (1) the length of MZK, which MCPO estimates is 69.2 miles (MCPO Ex. 2.3, p.1),
68 (2) a reduction of 1.5 miles, being the distance on Sulphur Springs Road between Henry Road
69 and ATXI's substation site, and (3) an addition of 3.0 miles, being the distance on Henry Road

70 from Sulphur Springs Road to Staff's preferred Option 1 site. Therefore, The Channon Hybrid
71 Route is 9.5 miles shorter than MCPO's route, from the Option 1 site to Kansas.

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73 Q. What would be the comparison in length of the two routes from Staff's Option 2 site?

74 A. The Channon Hybrid Route would still be 9.0 miles shorter than MCPO's route, from the
75 Option 2 site to Kansas.

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77 Q. What would be the comparison in length of the two routes from ATXI's proposed
78 substation site?

79 A. The Channon Hybrid Route would still be 3.0 miles shorter than MCPO's route.
80 MCPO's route is 69.2 miles, as noted above. The Channon Hybrid Route would be 66.2 miles
81 from ATXI's substation, as noted above.

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83 COST

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85 Q. If an average cost per mile, calculated from ATXI cost estimates, were used, what would
86 be the estimated cost for the Channon Hybrid Route and for the MCPO route, from the Staff
87 preferred Option 1 site?

88 A. Using a high average cost (\$1,934,239), the Channon Hybrid Route was estimated at
89 \$118,375,000 (PDM Ex. 6.0, Ex 6.2). Using the ATXI average for the MCPO route
90 (\$1,828,194, PDM Ex. 6.2) times 70.7 miles, the MCPO route is estimated at \$129,253,000.
91 Therefore, the MCPO route is \$10,878,000 more costly than the Channon Hybrid Route. This
92 cost difference results in spite of the fact that the MCPO route was given the benefit of the

93 lowest average cost while the highest average cost was applied to the Channon Hybrid Route
94 (PDM Ex. 6.2).

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OFF-COURSE ROUTING

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98 Q. How does connecting the MCPO route to Staff's preferred Option 1 site affect your
99 previous testimony on off-course routing?

100 A. Such a connection would further increase the off-course routing of the MCPO route, from
101 7.5 miles to 13.5 miles. The difference in latitude from the Staff Option 1 site to the Kansas
102 substation site is approximately 11.25 miles to the south. Thus, to accomplish this change in
103 latitude of 11.25 miles, the MCPO route would be required to travel 24.75 miles north and south,
104 meaning the MCPO route would have 13.5 off-course, unnecessary miles.

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PARALLEL ROUTING

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108 Q. From the Staff Option 1 proposed substation site, what are the mileage relationships
109 between the MCPO parallel routing and off-course routing?

110 A. The MCPO route parallels existing transmission lines for approximately 14 miles.
111 Because the MCPO route includes 13.5 off-course, unnecessary miles, any perceived benefits
112 achieved by paralleling are totally canceled. The MCPO route would actually result in an
113 increased negative impact. The MCPO route, therefore, would not provide net positive results
114 regarding paralleling.

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116 Q. What, if any effect will the MCPO route have on visual impact?

117 A. Any perceived visual benefits achieved by paralleling are also totally canceled by the off-
118 course miles and longer length of the MCPO route. The MCPO route would actually increase
119 visual impact due to its longer, unnecessary length. The MCPO route, therefore, would not
120 provide net positive results regarding visual impact.

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122 CONCLUSION

123 Q. What are your conclusions regarding your comparison of the Channon Hybrid Route and
124 the MCPO route from the Staff Option 1 proposed substation site?

125 A. The Channon Hybrid Route provides a net reduction in impact while the MCPO route
126 results in an increased negative impact. The Channon Hybrid Route is shorter and results in a
127 lower dollar cost. It follows a more direct route to the south and east rather than unnecessarily
128 traveling off-course to the north. Its shorter length translates into less environmental impact.
129 The Channon Hybrid Route efficiently utilizes the Staff Option 1 proposed substation site. The
130 Channon Hybrid Route supports the Staff's and the Commission's desire to move the Mt. Zion
131 substation further south. It supports the Staff's preferred substation site and is consistent with
132 Staff's placement of the Mt. Zion substation on the ATXI Primary Route to Kansas. The
133 Channon Hybrid Route supports the Commission's mandate in that it is the least cost and most
134 efficient route.

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136 Q. Does this conclude your rebuttal testimony?

137 A. Yes.

AFFIDAVIT

STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

I, MARY BURNS, after first being duly sworn on oath, depose and state that the testimony I have given is true and correct.

Mary Burns
Mary Burns

SUBSCRIBED and SWORN TO before me
this 2nd day of December, 2013.

Amanda M. Turnbull
Notary Public

