

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
(Rehearing)

Surrebuttal Testimony on Rehearing of

James R. Dauphinais

On behalf of

Moultrie County Property Owners (“MCPO”)

December 10, 2013



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Surrebuttal Testimony on Rehearing of James R. Dauphinais

1 **I. Introduction**

2 **Q PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.**

3 A James R. Dauphinais. My business address is 16690 Swingley Ridge Road,
4 Suite 140, Chesterfield, MO 63017.

5 **Q ARE YOU THE SAME JAMES R. DAUPHINAIS WHO FILED DIRECT TESTIMONY,**
6 **REBUTTAL TESTIMONY AND REBUTTAL TESTIMONY ON REHEARING IN THIS**
7 **PROCEEDING ON BEHALF OF MCPO?**

8 A Yes.

9 **Q WHAT IS THE SUBJECT MATTER OF YOUR SURREBUTTAL TESTIMONY?**

10 A I respond to the rebuttal testimony on rehearing of PDM/CFT witness Ms. Burns on
11 the selection of a route between Mt. Zion and Kansas. I also discuss the rebuttal
12 testimony on rehearing of ATXI witness Mr. Kramer on the powerflow analysis he
13 performed for the ICC Staff Option #1, Option #2 and Option #3 sites for the
14 proposed Mt. Zion substation. Finally, I also note the correction in ATXI witness Mr.
15 Hackman's rebuttal testimony on rehearing of ATXI's baseline cost estimate for
16 MCPO Route MZK from ATXI's proposed Sulphur Spring Road site for Mt. Zion
17 substation to Kansas substation (Route MZK) and identify revisions to some of the
18 cost estimate numbers provided in my rebuttal testimony on rehearing that result from
19 ATXI's correction.

20 My silence with regard to any other portions of the rebuttal testimony on
21 rehearing of these witnesses or any of the other rebuttal testimony on rehearing of
22 ATXI, ICC Staff or any other party in this proceeding, should not necessarily be taken
23 as an endorsement of any position taken by ATXI, ICC Staff or any other party has
24 taken in this proceeding.

25 **Q HAS THE REBUTTAL TESTIMONY ON REHEARING OF ATXI, ICC STAFF OR**
26 **ANY OTHER PARTY WITH RESPECT TO THE PANA TO MT. ZION TO KANSAS**
27 **PORTION OF THE ILLINOIS RIVERS PROJECT ("IRP") PROVIDED ANY NEW**
28 **INFORMATION THAT WOULD CHANGE YOUR REBUTTAL TESTIMONY ON**
29 **REHEARING CONCLUSIONS AND RECOMMENDATIONS?**

30 A No. I continue to stand by my rebuttal testimony on rehearing conclusions and
31 recommendations.

32 Q FOR THE CONVENIENCE OF THE COMMISSION, PLEASE SUMMARIZE THE
33 ROUTE NAMING CONVENTION YOU HAVE BEEN USING IN YOUR
34 TESTIMONIES ON REHEARING FOR THE VARIOUS MOULTRIE COUNTY
35 PROPERTY OWNER ("MCPO") AND CHANNON FAMILY TRUST ("CFT")
36 PROPOSED ROUTES FOR THE PORTION OF THE IRP BETWEEN MT. ZION AND
37 KANSAS.

38 A The MCPO and CFT proposed routes from Mt. Zion to Kansas are as follows:

- 39 • Using ATXI's Sulphur Spring Road Mt. Zion substation location:
- 40 – **Route MZK** – MCPO's Mt. Zion to Kansas route.
- 41 – **Route CFT** – ATXI's Mt. Zion to Kansas route from ATXI's Sulphur
42 Spring Road Mt. Zion substation site to the junction with ATXI's Mt.
43 Zion to Kansas Alternate Route in East Nelson Township and then
44 ATXI's Mt. Zion to Kansas Alternate Route from the junction to Kansas
45 substation.
- 46 • Using ICC Staff's Option #1 Mt. Zion substation location:
- 47 – **Route MZK-1** – ATXI's Mt. Zion to Kansas Primary Route from ICC
48 Staff's Option #1 Mt. Zion substation site north to the junction with
49 MCPO's Mt. Zion to Kansas route and then MCPO's Mt. Zion to
50 Kansas route from the junction east to Kansas substation.
- 51 – **Route CFT-1** – ATXI's Mt. Zion to Kansas Primary Route from ICC
52 Staff's Option #1 Mt. Zion substation site to the junction with ATXI's Mt.
53 Zion to Kansas Alternate Route in East Nelson Township and then
54 ATXI's Mt. Zion to Kansas Alternate Route from the junction to Kansas
55 substation.
- 56 • Using ICC Staff's Option #2 Mt. Zion substation location:
- 57 – **Route MZK-2** – ATXI's Mt. Zion to Kansas Primary Route from ICC
58 Staff's Option #2 Mt. Zion substation site north to the junction with
59 MCPO's Mt. Zion to Kansas route and then MCPO's Mt. Zion to
60 Kansas route from the junction east to Kansas substation.
- 61 – **Route CFT-2** – ATXI's Mt. Zion to Kansas Primary Route from ICC
62 Staff's Option #2 Mt. Zion substation site to the junction with ATXI's Mt.
63 Zion to Kansas Alternate Route in East Nelson Township and then
64 ATXI's Mt. Zion to Kansas Alternate Route from the junction to Kansas
65 substation.

66 Maps for each of these six route options from Mt. Zion to Kansas are provided
67 in Mr. Reinecke's Exhibit 2.1 (RH). Routing factors and paralleling information for
68 each of the six routes is provided in Mr. Reinecke's MCPO Exhibits 2.2 (RH) and
69 2.3 (RH) as well as my MCPO Exhibits 1.2 (RH) through 1.4 (RH).

70 **II. Response Rebuttal Testimony**
71 **on Rehearing of PDM/CFT Witness Burns**

72 **Q HAVE YOU REVIEWED THE REBUTTAL TESTIMONY OF PDM/CFT WITNESS**
73 **MS. BURNS?**

74 A Yes.

75 **Q MS. BURNS COMPARES THE TOTAL LENGTH OF ROUTE MZK, MZK-1, MZK-2,**
76 **CFT, CFT-1 AND CFT-2 (PDM EXHIBIT 7.0 AT PAGE 4, LINES 54 THROUGH**
77 **PAGE 5, LINE 81). DO YOU DISPUTE ANY OF HER TOTAL LENGTH**
78 **NUMBERS?**

79 A Yes. At lines 73 through 74, she states Route CFT-2 is 9.0 miles shorter than Route
80 MZK-2. This is incorrect. Mr. Reinecke has determined Route MZK-2 has a total
81 length of 70.2 miles and Route CFT-2 has a total length of 61.9 miles (MCPO Exhibit
82 2.2 (RH) at page 1). Route CFT-2 is only 8.3 miles shorter than Route MZK-2.

83 **Q MS. BURNS PRESENTS ADDITIONAL TESTIMONY WITH REGARD TO**
84 **"OFF-COURSE ROUTING" (PDM EXHIBIT 7.0 AT PAGE 6). HOW DO YOU**
85 **RESPOND?**

86 A As I discussed at length in my rebuttal testimony on rehearing (MCPO Exhibit
87 1.0 (RH) at pages 20 through 22), deviation from a straight line course is a common

88 practice in transmission line routing when the adverse impacts to the public that are
89 avoided by that deviation outweigh the incremental adverse impact associated with
90 that deviation. Furthermore, her claim of “13.5 off-course, unnecessary miles” is
91 meaningless. A route that deviates from a straight line to avoid adverse impacts to
92 the public does not result in “unnecessary miles”. While deviations from a straight
93 line increase line length and estimated construction cost, what matters in selecting a
94 transmission line route is how the available routes compare with regard to all the
95 factors considered by the Commission in aggregate, not just total line length and
96 estimated construction cost. Finally, Routes MZK, MZK-1, MZK-2 are not 13.5 miles
97 longer than CFT’s shortest route -- Route CFT-1. They are only 8.1 miles (13.3%) to
98 9.6 miles (15.7%) longer than Route CFT-1.

99 **Q MS. BURNS ALSO PRESENTS ADDITIONAL TESTIMONY WITH RESPECT TO**
100 **PARALLEL ROUTING (PDM EXHIBIT 7.0 AT PAGE 6, LINE 10 THROUGH PAGE**
101 **7, LINE 120). HOW DO YOU RESPOND?**

102 A First, I would note some of her numbers are incorrect. Route MZK has a total length
103 of 69.2 miles of which 14.7, not 14, miles parallel existing transmission lines (Exhibit
104 MCPO 2.3 (RH) at page 1). Route CFT-1 has a total length of 61.1 miles of which
105 only 1.0 mile parallels existing transmission lines. While Route MZK is 8.1 miles
106 longer than Route CFT-1, all 8.1 miles of that additional length, plus an additional
107 5.6 miles of length, parallel existing linear infrastructure that already has generally
108 similar visual, noise and environmental fragmentation impact. Thus, it can be said
109 that Route CFT-1, compared to Route MZK, introduces 13.7 more miles of new
110 visual, noise and environmental fragmentation impact where such impact does not
111 already exist. Furthermore, as I discussed at length in my rebuttal testimony on

112 rehearing (MCPO Exhibit 1.0 (RH) at pages 22 through 23), the issue, as with all
113 others pro or con, must be considered on a holistic basis. Ms. Burns does not do so.

114 **Q MS. BURNS INDICATES IN HER CONCLUSION THAT ROUTE CFT-1 SUPPORTS**
115 **THE COMMISSION'S DESIRE TO MOVE THE MT. ZION SUBSTATION FURTHER**
116 **SOUTH (PDM EXHIBIT 7.0 AT PAGE 7, LINES 129 THROUGH 131). HAS THE**
117 **COMMISSION ISSUED ANY ORDER SPECIFYING A DESIRE TO MOVE THE**
118 **MT. ZION SUBSTATION FURTHER SOUTH?**

119 A No, it has not.

120 **Q MS. BURNS ALSO INDICATES IN HER CONCLUSION THAT THE**
121 **COMMISSION'S MANDATE IS TO SELECT THE LEAST COST AND MOST**
122 **EFFICIENT ROUTE (PDM EXHIBIT 7.0 AT PAGE 7, LINES 132 THROUGH 134).**
123 **IS THAT THE COMMISSION'S MANDATE?**

124 A No. As I discussed in my direct testimony in this proceeding (MCPO Exhibit 1.0 at
125 page 6), Section 8-406.1(f) of the Public Utilities Act specifies what the Commission
126 must consider in granting a Certificate of Public Convenience and Necessity
127 ("CPCN") for a proposed transmission line including the selection of a route for that
128 proposed transmission line. Furthermore, with respect to the "least-cost means of
129 satisfying service needs" portion of Section 8-406.1(f), the Commission in its August
130 20, 2013 Order in this proceeding indicated:

131 "Resolving the question of least-cost involves a comprehensive
132 consideration and balancing of the overall costs and externalities of
133 each proposed route against the benefits of each proposed route. The
134 costs and externalities include not just a financial tally for manpower
135 and equipment, but also the impact on local residences and resources
136 and present and future land uses." (August 20, 2013 Order at page
137 14).

138 As an example, as I discussed in my direct testimony in this proceeding (MCPO
139 Exhibit 1.0 at page 21) in Docket No. 06-0179, the Commission selected a route that
140 had a higher estimated construction cost, but a lower number of residences in
141 proximity.

142 **Q MS. BURNS ALSO CONCLUDES ROUTE CFT-1 PROVIDES A “NET**
143 **REDUCTION” IN IMPACT WHILE THE MCPO ROUTE RESULTS IN AN**
144 **INCREASED NEGATIVE IMPACT (PDM EXHIBIT 7.0 AT PAGE 7). HOW DO YOU**
145 **RESPOND?**

146 **A** She made a similar conclusion in her direct testimony on rehearing. As I indicated in
147 my rebuttal testimony on rehearing, this is simply inaccurate (MCPO Exhibit 1.0 (RH)
148 at page 24). Ms. Burns has not performed a “net reduction” analysis at all. As I have
149 just noted, the Commission has indicated the selection of a route involves a
150 comprehensive consideration and balancing of the overall cost and externalities of
151 each proposed route against the benefits of each proposed route. Simply
152 (i) comparing total length, (ii) comparing estimated construction cost and (iii) asserting

153 there is less “environmental impact” due to shorter length¹ does not amount to a
154 comprehensive consideration and balancing of the overall cost and externalities of
155 each proposed route against the benefits of each proposed route. Such a
156 comprehensive consideration and balancing involves considering the detailed
157 characteristics of the route alternatives that have been compiled by experts such as
158 Mr. Reinecke and ATXI witness Donnell Murphy as they roll up under the categories
159 of characteristics the Commission used in its August 20, 2013 Order including the
160 relative severity of the adverse impacts associated with those characteristics. It is
161 unreasonable to simply state less length means less environmental impact. This
162 especially true when one considers that Routes MZK, MZK-1 and MZK-2 introduce
163 13.7 less miles of new visual, noise and environmental fragmentation impact where it
164 does not already exist than Route CFT-1. It is also unreasonable to completely
165 ignore the proximity of each route alternative to residences and non-residential
166 structures.

167 As I discussed in my rebuttal testimony on rehearing, the principal incremental
168 adverse impacts of Routes MZK, MZK-1 and MZK-2 compared to Route CFT-1 (the
169 best performing of the six CFT and ATXIA route options) are as follows:

¹It should also be noted that Ms. Burns does not define her use of the term “environmental impact.” It is not clear whether she is referring to: (i) the total acreage of the 500 foot analysis corridor for routes, (ii) all of the factors considered by the Commission in aggregate besides total length and construction cost or (iii) adverse impact to the subset of the factors the Commission considers that relate to adverse impact to natural features in the environment such as deciduous forest, wooded areas, wetlands, open water, streams, lakes, protected species, rookeries and natural areas. With regard to total acreage, that is not a measure of environmental impact, but rather simply another way of stating total length since total acreage is simply the product of total length and the 500 foot study corridor width. With regard to all of the factors considered by the Commission in aggregate besides total length and construction cost, as I showed in my rebuttal testimony on rehearing, and will show again below, the MCPO routes outperform the CFT routes in this regard despite the MCPO routes have additional total length. With regard to adverse impact on natural features in the environment, Mr. Reinecke concludes in his surrebuttal testimony on rehearing (MCPO Exhibit 4.0 (RH)) that the MCPO and CFT routes have comparable adverse impact on natural features in the environment despite the MCPO routes having additional total length in comparison to the CFT routes.

- 170 • 8.1 miles (13.3%) to 9.6 miles (15.7%) of additional route length (MCPO
171 Exhibit 2.2 (RH) at page 1);
- 172 • \$14.4 million (12.2%) to \$17.8 million (15.0%) of greater estimated
173 baseline construction cost (ATXI Exhibit 5.1 (RH) at page 2 and MCPO
174 Exhibit 1.5 (RH)); and
- 175 • 90 (5.3%) to 108 (6.4%) more acres of Prime Farmland within the 500 foot
176 analysis corridor (MCPO Exhibit 1.2 (RH)).

177 In exchange, versus Route CFT-1, Routes MZK, MZK-1 and MZK-2 have:

- 178 • 15 (48.4%) to 19 (61.3%) fewer residences within 500 feet of the
179 centerline of the route (MCPO Exhibit 1.2 (RH));
- 180 • 14 (66.7%) to 16 (76.2%) fewer residences within 300 feet of the
181 centerline of the route (*Id.*);
- 182 • 7 (77.8%) fewer residences within 150 feet of the centerline of the route
183 (*Id.*);
- 184 • 1 (33.3%) to 2 (66.7%) fewer schools within the 500 foot analysis corridor
185 (*Id.*);
- 186 • 77 (60.0%) to 78 (60.5%) fewer non-residential structures within 500 feet
187 of the centerline of the route (MCPO Exhibit 2.2 (RH) at page 4);
- 188 • 46 (71.9%) to 54 (84.4%) fewer non-residential structures within 300 feet
189 of the centerline of the route (*Id.*);
- 190 • 19 (79.2%) to 22 (91.7%) fewer non-residential structures within 150 feet
191 of the centerline of the route (*Id.*);
- 192 • 6 fewer non-residential structures within the 150 foot easement of the
193 route that might have to be removed (*Id.*);² and
- 194 • 11.7 (8.2%) to 32.6 (22.8%) fewer acres of wooded areas within the
195 500 foot analysis corridor (MCPO Exhibit 1.3 (RH)).

196 In addition, while 8.1 to 9.6 miles of additional length is needed for Routes
197 MZK, MZK-1 and MZK-2 versus Route CFT-1, all of that additional length, plus an
198 additional 4.1 to 5.6 miles of existing length is closely parallel to existing electric
199 transmission lines, which helps to mitigate the visual, noise and environmental

²There are no non-residential structures within the 150 foot easement of Routes MZK, MZK-1 and MZK-2.

200 fragmentation of the new transmission line by placing it where similar such visual,
201 noise and environmental fragmentation already exists.

202 Finally, as I discussed in my rebuttal testimony on rehearing (MCPO Exhibit
203 1.0 (RH) at page 19), it is important to recognize the limited nature of the adverse
204 impact to Prime Farmland being placed within the 500 foot analysis corridor.
205 Specifically, the placement of a new transmission line in cultivated lands or pasture
206 land (even where there is Prime Farmland) only removes from production the land at,
207 and very close to, the foundation of the structures. In addition, the overhead wires
208 between the structures neither remove land from production nor introduce any
209 significant agricultural fragmentation.

210 In sum, the adverse impacts avoided by Routes MZK, MZK-1 and MZK-2
211 exceed the incremental adverse impacts associated with those routes versus Route
212 CFT-1, which, as I noted in my rebuttal testimony on rehearing, is the best performing
213 of the three CFT routes (Routes CFT, CFT-1 and CFT-2). In other words, analyzed
214 on a holistic basis, Routes MZK, MZK-1 and MZK-2 all have better routing factor
215 performance in aggregate than Routes CFT, CFT-1 and CFT-2.

216 **III. Mt. Zion Powerflow Analysis of ATXI Witness Kramer**

217 **Q IN ITS REBUTTAL TESTIMONY ON REHEARING, DID ATXI PRESENT ANY**
218 **POWERFLOW ANALYSIS REGARDING THE VIABILITY OF THE ICC STAFF**
219 **OPTION #1, OPTION #2 AND OPTION #3 SITE FOR MT. ZION SUBSTATION?**

220 **A** Yes. Mr. Kramer presents the results of the powerflow analysis in his rebuttal
221 testimony on rehearing (ATXI Exhibit 4.0 (RH) at pages 6 through 9), Exhibit
222 4.1 (RH), Exhibit 4.2 (RH), Exhibit 4.3 (RH) and Exhibit 4.4 (RH). His powerflow
223 analysis showed ICC Staff's Option #1 and Option #2 sites for Mt. Zion substation are

224 not as effective, as ATXI's proposed Sulphur Spring Road site for Mt. Zion substation
225 with respect to the low voltage issue that is being addressed by Mt. Zion substation
226 (*Id.* at pages 6 through 7). It also showed that the ICC Staff Option #3 site was not
227 sufficient to address the low voltage issue (*Id.* at pages 7 through 8). These results
228 are generally consistent with my rebuttal testimony on rehearing conclusions with
229 respect to the location of Mt. Zion substation.

230 **IV. ATXI's Correction of the Baseline Cost Estimate**
231 **For MCPO Route MZK from ATXI's Proposed Sulphur**
232 **Spring Road Site for Mt. Zion Substation to Kansas Substation**

233 **Q PLEASE EXPLAIN THE COST ESTIMATE CORRECTION ATXI MADE IN THE**
234 **REBUTTAL TESTIMONY ON REHEARING OF MR. HACKMAN.**

235 A On page 2 of ATXI Exhibit 5.1 (RH), Mr. Hackman presented a correction to ATXI's
236 baseline cost estimate for MCPO Route MZK from ATXI's proposed Sulphur Spring
237 Road site for Mt. Zion substation to Kansas substation to Kansas substation (Route
238 MZK). Specifically, Mr. Hackman has raised the baseline cost estimate for Route
239 MZK from \$126,511,000 to \$132,531,000. All of my testimony herein reflects ATXI's
240 correction.

241 **Q DOES THIS AFFECT THE ATXI BASELINE COST ESTIMATES FOR EITHER**
242 **ROUTE MZK-1 OR ROUTE MZK-2 THAT YOU PRESENTED IN YOUR REBUTTAL**
243 **TESTIMONY?**

244 A No. ATXI's correction in its rebuttal testimony on rehearing only affects the baseline
245 cost estimate for Route MZK. The current baseline cost estimates for Routes MZK-1
246 and MZK-2 were provided in ATXI's revised response to Data Request MCPO-ATXI
247 17.01. Those cost estimates were included in my MCPO Exhibit 1.5 (RH) and relied

248 upon in my rebuttal testimony on rehearing for Routes MZK-1 and MZK-2. They have
249 not been changed or updated by ATXI.

250 **Q DOES ATXI'S CORRECTION TO ITS BASELINE COST ESTIMATE FOR ROUTE**
251 **MZK IN ANY WAY AFFECT THE CONCLUSIONS OR RECOMMENDATIONS**
252 **CONTAINED IN YOUR REBUTTAL TESTIMONY ON REHEARING?**

253 A No, it does not.

254 **Q WILL REVISIONS BE MADE TO YOUR REBUTTAL TESTIMONY ON REHEARING**
255 **TO REFLECT ATXI'S CORRECTION OF ITS COST ESTIMATE FOR ROUTE MZK?**

256 A Yes. The revisions will be as follows:

- 257 • MCPO Exhibit 1.0 (RH), page 12, line 277:
 - 258 – Change “16.3 (Rev.)” to “5.1 (RH).”
- 259 • MCPO Exhibit 1.0 (RH), page 14, line 325:
 - 260 – Change “\$8.3 million (7.1%)” to “\$14.4 million (12.2%).”
- 261 • MCPO Exhibit 1.0 (RH), page 18, line 423:
 - 262 – Change “\$8.3 million (7.1%)” to “\$14.4 million (12.2%).”
- 263 • MCPO Exhibit 1.0 (RH), page 21, line 481:
 - 264 – Change “\$8.3 million (7.1%)” to “\$14.4 million (12.2%).”
- 265 • MCPO Exhibit 1.2 (RH), Route MZK:
 - 266 – Change “\$126.51” in yellow to “\$132.53” in orange.
- 267 • MCPO Exhibit 1.3 (RH), Route MZK:
 - 268 – Change “\$126.51” in yellow to “\$132.53” in orange.

269 A revised version of each of the exhibits referenced above will be filed with the
270 Commission to reflect ATXI's correction.

271 **V. Conclusions and Recommendations**

272 **Q HAS THE REBUTTAL TESTIMONY ON REHEARING OF ATXI, ICC STAFF OR**
273 **ANY OTHER PARTY WITH RESPECT TO THE PANA TO MT. ZION TO KANSAS**
274 **PORTION OF THE ILLINOIS RIVERS PROJECT ("IRP") PROVIDED ANY NEW**
275 **INFORMATION THAT WOULD CHANGE YOUR REBUTTAL TESTIMONY ON**
276 **REHEARING CONCLUSIONS AND RECOMMENDATIONS?**

277 A No, it has not. I continue to recommend the Commission select ATXI's proposed
278 Sulphur Spring Road site for Mt. Zion substation. In addition, regardless of the site
279 for Mt. Zion substation chosen by the Commission, I continue to recommend the
280 Commission select MCPO's proposed route from Mt. Zion substation to Kansas
281 substation.

282 **Q DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY ON REHEARING?**

283 A Yes, it does.

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