

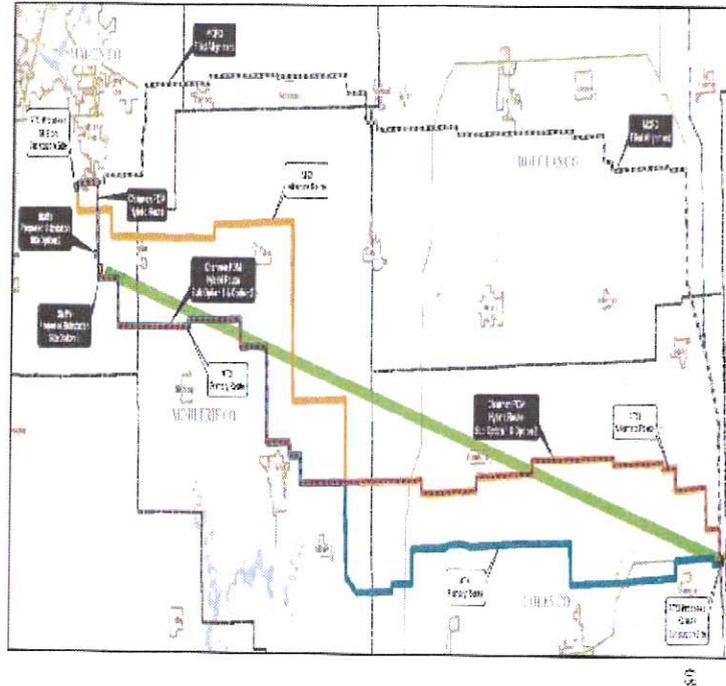
site to Kansas is 61.2 miles (PDM Ex. 7.0, p.4, 1.58-65). By comparison, the MCPO route from the Option 1 site to Kansas is 70.7 miles (Id. p.4, 1.66-71). Thus, the MCPO route is 9.5 miles longer than the Channon route (Id. p.5, 1.70-71).

The MCPO route unnecessarily detours miles offcourse to the north. In terms of latitude, the Kansas substation is 11.25 miles south of the Option 1 site (Id. p.6, 1.101-102). However, in order to avoid Moultrie County, the MCPO route travels 13.5 wasteful miles offcourse, heading 6.75 miles north from the Option 1 site to a point north of US Rt. 36, and then all of that same distance back south, before the MCPO route even begins to transit the 11.25-mile difference in latitude between the Option 1 site and the Kansas substation. ATXI stated in response to a data request that it did not even develop routes north of US Rt. 36 because:

[A]ny alternatives north of Route 36 would require additional line length (which would increase cost and create a greater potential for impact) to extend north and then back south.

PDM Ex. 8.6. Indeed, MCPO's routing through Piatt and Douglas Counties is so far afield that the petition and case caption do not even mention these two counties. The Commission, Staff, and ATXI have therefore all three expressed the viewpoint that the 345kV line should not detour north to Mt. Zion from the substation site "nearer a line between Pana and Kansas" (Final Order, p.84), yet this is exactly what MCPO proposes to do. Indeed, Mr. Rockrohr testified that adoption of the MCPO route would defeat the purpose in developing the more southern substation locations (Tr. p.326, 1.20 - p.327, 1.4). A straight line from Staff's Option 1 site to the Kansas substation (in green) overlaid on ATXI's graphic (ATXI Ex. 6.0 (RH), p.7, Figure 2) shows the off-course nature of the MCPO route:

Figure 2.



In the underlying proceeding, MCPO witness Rudolph Reinecke testified that he developed a shorter route in northern Moultrie County that affected fewer residences, but MCPO nevertheless pursued a longer and more off-course route to avoid Moultrie County:

- Q. You did study a route running one mile south of Route 36 that ran through northern Moultrie County, didn't you?
- A. Correct.
- Q. And you sent an e-mail on December 19th to Mr. Robertson, your client, and told him that this route on the south side of U.S. 36 appeared to be a better route for a number of reasons, did you not?
- A. Subject to check, yes.
- Q. I'd like to show you that, and I've marked this document as PDM Cross Exhibit 1.0. Is this an e-mail you sent to Mr. Robertson on December 19th?
- A. Yes.

- Q. And in this e-mail, you told Mr. Robertson that you have a route on the south side of U.S. 36 which appears to be better for a number of reasons, is that right?
- A. Yes.
- Q. And the first reason you stated as to why it would be a better route is because it was shorter, is that right?
- A. Correct.
- Q. And the second reason you stated that this route would be better is because it would have less impacts to structures than the northern route, is that correct?
- A. In context, yes, that is the statement.

Tr. of May 15, p. 613, l. 11-22; p. 614, l. 1-17. But MCPO never filed the more southerly route through Moultrie County that Mr. Reinecke had preferred.

In addition, MCPO witness James Dauphinais agreed in the underlying proceeding that the MCPO route takes “a detour to the north” (Tr. of May 15, p.580, l.7-10). Mr. Dauphinais testified that his instructions were to look “beyond Moultrie County” (Id. p.558, l.10). ATXI witness Dennis Kramer testified that MCPO’s route was “primarily driven by a need to find a planning rationale to eliminate any route from traversing Moultrie County” (ATXI Ex. 11.0, p.12, l.266).

Another drawback to the MCPO northern detour is that the route must make two, entirely unnecessary, highway crossings over US Rt. 36. US Rt. 36 is a major highway in central Illinois.

Summary. The Channon and Staff routes are clearly the favored routes on this factor, as the MCPO route is over 9 miles longer.

2. Difficulty and Cost of Construction.

The Commission’s prior finding. The Commission found that the MCPO route had the lowest overall construction costs, despite its length (Final Order, p.98). That conclusion is clearly no longer supported by the record, as ATXI has estimated the construction of the competing routes

and found that the baseline construction cost of the MCPO route is \$17,000,000 higher than the baseline construction cost of the Channon/Staff routes, from Staff's Option 1 site (Tr. p.331, 1.4-7).

Staff agrees the MCPO route is more costly. Mr. Rockrohr agreed that the MCPO baseline cost is about \$17,000,000 more than the Channon and Staff routes (Id.). Staff did not note any unique features of either route that would make one route more difficult to construct than the other (Tr. p.331, 1.12-16), and therefore this factor clearly favors the Channon and Staff routes over the MCPO route (Tr. p.331, 1.17-19). In addition, Mr. Rockrohr agreed with the testimony of ATXI witness Trelz that on a route that is nine miles longer in length, there would be approximately 48 to 50 more structures and spans to construct (Tr. p.334, 1.6-8, p.335, 1.2-3).

ATXI testified that the MCPO route is more costly. PDM Ex. 8.2 is a data response prepared by ATXI witness Jeffrey Hackman showing that from Staff's Option 1 site, the baseline cost for the MCPO route is \$135,915,000, the most expensive of all of the route combinations. The baseline cost of the Channon route is \$118,169,000, the least expensive of all the route combinations.

RESPONSE

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a)	\$127,836,000	127,836,000	
b)	\$118,169,000	118,169,000	← CFT 1
c)	\$119,728,000	119,728,000	
d)	\$135,915,000	135,915,000	← AZK 1
e)	\$134,894,000	134,894,000	
f)	\$127,569,000	127,569,000	
g)	\$126,646,000	126,646,000	

Based on this exhibit prepared by ATXI, the MCPO route is \$17,746,000 more costly to construct than the Channon route. And this is just a baseline cost differential. Because the MCPO route is over 9 miles longer, it will require some 173 more acres of easement than the Channon route (PDM Ex. 8.0, p.11, l.198-201). There is a significant additional cost to ratepayers for ATXI to acquire easements over an additional 173 acres, and such acquisition costs must include not just the easement value, but also compaction damages and damages to the remainder.

ATXI witness Hackman testified that paralleling existing transmission lines has no practical reduction in the cost of construction of a new 345kV line (ATXI Ex. 12.0, p.5, l.97-103). Not only is there no construction cost savings, Mr. Hackman identified construction difficulties that exist when constructing the new line parallel to an existing line (ATXI Ex. 12.0, p.6, l.110-121).

Summary. All components of this factor related to difficulty and cost of construction clearly favor the Channon and Staff routes over the MCPO route, by a margin of at least \$17 million.

3. Difficulty and Cost of Operation and Maintenance.

The Commission's prior finding. The Commission found in the underlying proceeding that the difficulties associated with the operation and maintenance of the competing routes did not appear to vary significantly (Final Order, p.98). The evidence on rehearing no longer supports this conclusion. First, the Commission stated that the problems caused by constructing parallel transmission lines can be avoided if sufficient space is provided between the lines (Id.). However, the testimony on rehearing is that the easement for the MCPO route is immediately adjacent to the easements for the existing transmission lines (Tr. p.341, l.21; p.342, l.6). This can easily be seen on MCPO Cross Ex. 1, image 12:



Therefore, sufficient space has not been provided to avoid or mitigate the problems caused by parallel transmission lines. Second, the MCPO route, being over 9 miles longer, will require some 50 additional support structures and spans over the number required for the Channon/Staff routes (Tr. of 5/14, p.406, l.17), and this fact alone renders the MCPO route more costly to operate and maintain over the life of the transmission line.

Staff confirms there is no spacing between the MCPO route and existing lines. Mr. Rockrohr stated that Staff's understanding is that the MCPO proposal is for the easement area of the MCPO line where it parallels existing transmission lines to abut the easement areas for those existing