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**PREPARED REBUTTAL TESTIMONY
OF
VERN G. MAAS
ON BEHALF OF
CENTRAL ILLINOIS LIGHT COMPANY
DOCKET NO. 00-0710
(REVISED)**

1 Q1: Please state your name and business address.

2 A1: My name is Vern G. Maas and my business address is 300 Liberty Street, Peoria,
3 Illinois, 61602.

4 Q2: By whom are you employed and in what capacity?

5 A2: I am employed by Central Illinois Light Company ("CILCO" or "the Company") as a
6 Team Leader responsible for a multi-functional team of Gas Regulation and
7 Measurement, Gas Storage Facilities, Gas Control, Gas Metering and Gas
8 Transmission Engineering.

9 Q3: Please describe your qualifications and work experience?

10 A3. Specific responsibilities include but are not limited to overseeing operation and
11 maintenance of Gas Storage Fields, Gas Regulator Stations, Industrial & Commercial
12 Metering Installations, Gas Meter Shop, Transmission Engineering, Gate Stations or
13 Purchase Points with pipeline suppliers, measurement, odorization and system
14 pressures. I have been with Central Illinois Light Company since 1964, approximately
15 37 years, working as a Journeyman in Gas Operations, crew leader, foreman in Gas
16 Regulation, Supervisor Field Services, Supervisor Gas Flow Pressure Control,
17 Supervisor Gas Control Dispatch Unit, Supervisor Gas Construction and Distribution,
18 Supervisor Customer Alliance Services and Gas Metering, Supervisor Gas

19 Transmission Engineering. I have worked in all aspects of Gas Operations in design,
20 construction and operation of Natural Gas Distribution, Transmission, Underground
21 Storage and Metering. I helped develop the Gas Apprentice Program. I worked on
22 Code Compliance to set standards of operation and contributed to the development of
23 CILCO's Operation and Maintenance Manual to comply with State and Federal
24 Regulations. I taught classes at state meetings at the request of the Illinois Commerce
25 Commission and the Missouri Public Service Commission.

26 Q4. What is the purpose of your rebuttal testimony?

27 A4. The purpose of my rebuttal testimony is to explain the operating conditions that led
28 CILCO to incur the Delivered Storage Service and balancing charges from NGPL on
29 November 23 and 24, 2000. Staff witness Anderson proposed an adjustment to
30 disallow recovery of these costs through the PGA.

31 Q5. Do you agree with Mr. Anderson that "[c]hanging orifice meter plates is a routine task
32 normally performed in the fall and spring of the year?"

33 A5. I agree with Staff witness Dennis Anderson that changing orifice plates is a routine
34 task and I can understand his thinking and concern that changing orifice plates is
35 normally performed in the spring and fall at many installations as system loads change.
36 However, Princeton Gate Station is not typical, and unlike small gate stations, the
37 orifice plates are not normally changed seasonally. Princeton is unique in its design as
38 the metering here is owned by CILCO, and the supplier (NGPL) takes a signal from
39 our meters. One of the reasons the orifice plates at Princeton are not seasonally
40 changed is due to system load balancing with ANR Pipeline, Panhandle Eastern
41 Supply from the south, and storage field injection/withdrawal schedules. This enables

42 CILCO to normally keep the flow rates within the desired limits.

43 Q6. Please describe the operational conditions existing at the time that CILCO incurred the
44 NGPL charge in November 2000?

45 A6. Operational conditions were impacted by warming temperatures; the average
46 temperature went from 18 degrees on November 21 to 40 degrees on November 24.
47 Our system pipeline pressures were packing up and we were starting to have problems
48 moving gas into our system. NGPL's pressures were also starting to drop off affecting
49 what the metering will pass at Princeton.

50 Q7. Do you agree that "routine monitoring of telemetering data" should have enabled
51 CILCO to avoid the NGPL charges?

52 A7. No, I do not. Telemetering data was being monitored very closely. System changes
53 were occurring due to temperatures warming, causing pipeline pressures to build on
54 our system, packing lines in the north. Dispatchers did notice the changes, and at 8:00
55 p. m. on Friday night after Thanksgiving, November 24, we discussed the various
56 options for getting the gas into our system. We decided to call out a technician from
57 his home to go to Princeton at the northern most point of CILCO's system and change
58 the orifice plates. We also called out a Glasford Storage Field technician to start a
59 larger compressor to inject more gas into the field. Unfortunately, NGPL's inlet
60 pressure to Princeton continued to fall and by midnight had decreased by
61 approximately 70 psi. At 1:30 a. m. the dispatcher contacted NGPL and asked them if
62 they could increase pressure to us. We do not control pressure at Princeton as there is
63 no regulation, but have to rely on the supplier's pipeline pressure. NGPL Pipeline
64 pressures did not start to increase until approximately 6:00 a. m. November 25. We

65 were unable to receive all the gas nominated for a short time, however due to the
66 system changes that were made, all of the gas nominated for the remaining Holiday
67 weekend was received into CILCO's gas pipeline system.

68 Q8. Does this complete your prepared rebuttal testimony?

69 A8. Yes, it does.