

**Ameren Transmission Company of Illinois's
Response to William McMurtry Data Requests
Docket No. 14-0514**

Petition for a Certificate of Public Convenience and Necessity, pursuant to Section 8-406 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 in the Counties of Peoria and Knox, Illinois.

Data Request Response Date: 3/27/2015

WM-ATXI 4.01

AXTI's original filing dated August 21, 2014 had Route B at \$97.0 million. ATXI response to ENG 1.05, dated September 24, 2014 and ATXI Exhibit 12.0, page 5 of 13, dated March 5, 2015 showed Route B at \$97.9 million. ATXI Response to SP 1.15, question h, Page 4 of 4, dated October 20, 2014, had the cost of Route B at \$99.7 million. Response to WM-ATXI 3.08, dated January 30, 2015 gave the expected range of costs for Route B as \$94.1 million to \$105.2 million, which gives a mean of \$99.7 million.

- a. What is the range of probable contingency cost for Route B and the cost range for the transmission line Route B at the \$97.0 million figure?
- b. How much of the Route B contingency cost is devoted to addressing Mines as stated in Ameren Exhibit 14.0, Page 9 of 15, Lines 182 thru 194?
- c. What is the range of probable contingency cost for Route B and the cost range for the transmission line Route B at the \$97.9 million figure?
- d. What is the range of probable contingency cost for Route A, and the cost range for the transmission line Route A at the original date of filing \$92.3 million figure?
- e. How much of the Route A contingency cost is devoted to addressing the 37 recorded mines (pointed out in the WM Exhibit 13, Fox Creek Opening AML narrative) as stated in Ameren Exhibit 14.0, Page 9 of 15, Lines 178 thru 194.

OFFICIAL FILE

RESPONSE

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ILL. C. C. DOCKET NO. 14-0514
McMurtry Cross Exhibit No. 3
Witness Greg Rookroff
5/12/15 S. Randolph

ATXI submitted a corrected response to SP 1.15 subsection h on March 12, 2015.

While it is accurate to say that the arithmetic mean, or average, of \$94.1 million and \$105.2 million is \$99.7 million, it is inaccurate to assume that this is the mean of the probable costs for Route B. The mean of the expected range of costs for Route B is \$97.9 million. For an asymmetrical probability distribution, such as the distribution for the contingency costs of Route B, the mean of the minimum and maximum of the range will not coincide with the mean of the entire distribution. Thus the expected value (or mean) of Route B contingency costs will not be the same as the arithmetic mean of minimum and maximum values in the range. Said another way, the probability distribution for the estimated contingency cost for the Transmission Line is

not symmetrically distributed; therefore, the mean of those contingency costs, and thus the cost of the Transmission Line, is not halfway between the range.

- a. The range of probable contingency cost for Route B was \$15.3 million to \$26.4 million. The expected range of costs for Route B was \$93.2 million to \$104.3 million.
- b. Objection. What is meant by "addressing" is vague and ambiguous. Further the data request assumes facts not in evidence, calls for speculation, and misrepresents Mr. Molitor's testimony as suggesting undocumented mines will impact the Transmission Line.
- c. The probable contingency cost and cost range were provided in ATXI's response to WM-ATXI 3.08.
- d. The range of probable contingency cost for Route A was \$13.3 million to \$22.7 million. The expected range of costs for Route A was \$87.4 million to \$96.8 million.
- e. Objection. What is meant by "addressing" is vague and ambiguous. Further the data request assumes facts not in evidence, calls for speculation, and misrepresents Mr. Molitor's testimony as suggesting the 37 mines will impact the Transmission Line.