

Docket No. 00-0200  
ICC Staff Exhibit 1.0

DIRECT TESTIMONY  
OF  
RONALD LINKENBACK  
ENGINEERING DEPARTMENT  
ENERGY DIVISION  
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY  
DOCKET NO. 00-0200

An Application of Commonwealth Edison Company for a  
Certificate of Public Convenience and Necessity

August 15, 2000

1 1. Q. Please state your name and business address.

2 A. My name is Ronald Linkenback and my business address is 527 East  
3 Capitol Avenue, Springfield, Illinois 62701.

4 2. Q. By whom are you employed and in what capacity?

5 A. I am employed by the Illinois Commerce Commission as an Economic  
6 Analyst in the Electric Section of the Engineering Department of the Energy  
7 Division.

8 3. Q. Please state your experience and educational background.

9 A. I hold a Bachelor of Science degree in Electrical Engineering from Iowa  
10 State University. I am a registered Professional Engineer in the States of  
11 Ohio and California. I was employed as an Electrical Engineer with San  
12 Diego Gas & Electric Company for six years, then with the City of Highland,  
13 Illinois as the manager of the municipal electric system for seven years and  
14 prior to joining the Illinois Commerce Commission I worked for High Voltage  
15 Maintenance Corporation as the manager of the Cleveland Division.

16 4. Q. What are your responsibilities as an Economic Analyst in the Electric  
17 Section of the Energy Division's Engineering Department?

18 A. My primary responsibilities and duties are in the performance of analyses  
19 dealing with the day-to-day and long-term operations and planning of the  
20 electric utilities serving Illinois. This work includes reviewing cogeneration  
21 tariffs, determining the used and usefulness of utilities' capital additions to  
22 rate base, and reviewing utilities' applications for Certificates of Public  
23 Convenience and Necessity.

24 5. Q. What are your responsibilities in this docket?

25 A. On February 29, 2000, Commonwealth Edison Company (“ComEd”) filed an  
26 Application requesting a Certificate of Public Convenience and Necessity  
27 (“Certificate”), pursuant to Section 8-406 of the Illinois Public Utilities Act (  
28 the “Act”) to construct, own, operate, and maintain a new 138,000 volt (“138  
29 kV”) electric transmission circuit in Lake County, Illinois. I was directed by  
30 the Chief of the Electric Section to investigate and evaluate ComEd’s need  
31 for the Certificate.

32 6. Q. According to the Act, what criteria must a utility satisfy in order to receive a  
33 Certificate?

34 A. To obtain a Certificate, a utility must meet the criteria set forth in Section 8-  
35 406(b) of the Act, which states as follows:

36 **(1) that the proposed construction is necessary to provide**  
37 **adequate, reliable and efficient service to its customers and is**  
38 **the least-cost means of satisfying the service needs of its**  
39 **customers;**

40 **(2) that the utility is capable of efficiently managing and**  
41 **supervising the construction process and has taken sufficient**  
42 **action to ensure adequate and efficient construction and**  
43 **supervision thereof; and**

44 **(3) that the utility is capable of financing the proposed**  
45 **construction without significant adverse financial**  
46 **consequences for the utility or its customers.**

47 7. Q. Have you investigated and evaluated ComEd's application with regard to all  
48 three criteria?

49 A. No, only the first; my colleague Edmund W. Bliler will discuss the remaining  
50 two criteria in his Direct Testimony (ICC Staff Exhibit 2.0). My testimony will  
51 offer an opinion pertaining to the evidence that ComEd has submitted in this  
52 proceeding to meet the criteria of Section 8-406(b), Part 1, of the Act.

53 8. Q. Has ComEd met the criteria of Section 8-406(b)(1)?

54 A. Yes, for reasons that I will explain below, I believe that ComEd has met the  
55 criteria. ComEd's proposed project to construct a 138 kV electric  
56 transmission circuit is necessary to provide adequate, reliable, and efficient  
57 service to Indeck-Libertyville, L.L.C. ("Indeck"). The proposed project is the  
58 least-cost means of satisfying the service needs of Indeck.

59 9. Q. Please describe the proposed 138 kV transmission circuit project.

60 A. ComEd is petitioning for a Certificate authorizing it to build, own, operate  
61 and maintain approximately 1.5 miles of new 138 kV transmission line.  
62 ComEd indicates that the new circuit is necessary because the Company  
63 received a request for transmission service from Indeck, an independent  
64 power producer. Indeck is expecting to produce approximately 300  
65 megawatts of electrical power and requires a new transmission line to  
66 connect its generator to ComEd's electric transmission system. The new  
67 transmission line will consist of one 138 kV circuit installed on an existing set  
68 of ComEd owned transmission structures. The existing structures are triple  
69 circuit steel lattice structures that have one open position. The new 138 kV  
70 transmission circuit will occupy this open position. The proposed circuit  
71 begins at the existing Libertyville Substation (TSS154), which is connected  
72 to ComEd's transmission system, and continues due west to the Indeck

73 facility substation, called Libertyville Energy Center (TSS933). With the  
74 exception of one span into the Indeck substation, the proposed 138 kV  
75 circuit will be installed on the existing ComEd owned structures and right-of-  
76 way.

77 **Necessity**

78 10. Q. Has ComEd provided information on why this project is necessary?

79 A. Yes. It indicates that Indeck, an independent electric power producer,  
80 requested ComEd provide transmission service.<sup>1</sup> The transmission service  
81 is needed to allow Indeck to have access to ComEd's transmission system.

82 11. Q. How have you applied the requirements of Section 8-406(b)(1) to determine  
83 if this project is needed?

84 A. This Certificate request is different from the typical Certificate because the  
85 proposed project is not required to reinforce or upgrade ComEd's  
86 transmission system. Instead, the project is necessary to connect a  
87 customer. Therefore, the need for the proposed project is driven by Indeck's  
88 request for service.

89 12. Q. Were you provided any verification of Indeck's plan to build a generating  
90 plant?

91 A. Yes, I was. ComEd has received a request for interconnection from Indeck; I  
92 have seen the letter of agreement signed by Indeck and ComEd on March 8,

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<sup>1</sup> Application, page 1, paragraph 2.

93 1999. The letter of agreement states the intent of the parties to proceed with  
94 the 138 kV project.<sup>2</sup>

95 13. Q. When is the Indeck facility expected to be ready to produce power?

96 A. ComEd's Application states that Indeck expects that the new facility will be in  
97 service by June 2001.

98 14. Q. Did ComEd state when they need to start construction to meet the scheduled  
99 start up dates of Indeck?

100 A. ComEd feels they need to be starting construction in approximately October  
101 2000 to have the transmission line in place to meet the Indeck start up  
102 schedule.<sup>3</sup>

103 15. Q. Are there any electric lines near the Indeck facility that ComEd can use to  
104 provide the required service?

105 A. Yes. There currently exists a 12 kV and a double circuit 345 kV line  
106 adjacent to the Indeck facility. The 12 kV circuit is too small to deliver  
107 the proposed 300 MW of power and the cost to connect the Indeck  
108 facility to either of the 345 kV lines would be much greater than costs  
109 associated with the proposed 138 kV line.

110 16. Q. Will the 138 kV interconnection provide adequate and reliable service to  
111 Indeck?

112 A. Based on the information available, it appears the proposed 138 kV project  
113 will provide adequate and reliable service to Indeck.

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<sup>2</sup> Response to Data Request ENG 1.1.

<sup>3</sup> Application, page 2, first sentence.

114 17. Q. Will the proposed transmission line serve other ComEd customers in  
115 addition to the Indeck generating facility?

116 A. Although the proposed 138 kV line could serve other ComEd customers, that  
117 is not ComEd's plan. ComEd stated that the 138 kV line will be dedicated to  
118 serve the Indeck facility.<sup>4</sup> ComEd stated that they did not have any previous  
119 immediate plans for the open position on the existing structure that will be  
120 used by the proposed 138 kV line.<sup>5</sup>

121 **Least-Cost Alternative**

122 18. Q. Is the 138 kV electric transmission circuit that ComEd is proposing the  
123 least-cost alternative?

124 A. Yes, it is my opinion that ComEd's proposed 138 kV transmission circuit will  
125 provide reliable service for the least cost.

126 19. Q. What is the cost to construct the transmission line proposed by ComEd to  
127 provide Indeck access to ComEd's transmission system?

128 A. The total estimated direct cost for the 138 kV transmission line is \$490,000  
129 in year 2000 dollars.<sup>6</sup> ComEd will design, build, own, operate and maintain  
130 the line.

131  
132 The cost for the entire project, including the transmission line, engineering  
133 and substation work, is approximately \$1,500,000. ComEd has stated that  
134 Indeck has agreed to reimburse ComEd for the entire cost of this project.<sup>7</sup>

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<sup>4</sup> Response to Data Request ENG 1.2.

<sup>5</sup> Mr. Lorenz's Direct Testimony, page 5, lines 99-100.

<sup>6</sup> Mr. Koszyk's Direct Testimony, Page 6, Line 10.

<sup>7</sup> Response to Data Request ENG 1.6.

135 20. Q. Will ComEd be reimbursed for costs incurred if the Indeck plant is not built?

136 A. In a letter of agreement, signed by both Indeck and ComEd, Indeck agreed  
137 to reimburse ComEd for all costs and expenses incurred by ComEd in  
138 performing the work through the date of termination.<sup>8</sup>

139 21. Q. Are there any areas along the proposed route that will require ComEd to  
140 utilize a type of construction that would be considered non-standard by the  
141 industry?

142 A. No. ComEd does not anticipate having to use any non-standard construction  
143 techniques along the proposed transmission route.

144 **Transmission Line Route**

145 22. Q. Did ComEd consider any alternative line routes to serve the Indeck plant.

146 A. Yes, ComEd did briefly look at alternative 138 kV line routes. ComEd's  
147 recommended line route is on existing transmission right-of-way that is  
148 adjacent to the Indeck facility, is the shortest route and is the least cost route.  
149 For these reasons ComEd did not consider it necessary to strenuously  
150 review alternate line routes.<sup>9</sup> I agree with their decision.

151 23. Q. Did you inspect the proposed route?

152 A. Yes, on March 14, 2000, I conducted an inspection of the proposed route  
153 with Mr. Mark Lorenz, an employee of ComEd.

154 24. Q. What observations or conclusions did you make based on the visual  
155 inspection of the proposed route?

156 A. I concur with ComEd's selection of the proposed route to provide Indeck  
157 access to the transmission system. The proposed route is the most direct  
158 and it has minimal impact on the public.

159 25. Q. Has ComEd complied with the advance notification requirements of 83  
160 Illinois Administrative Code Part 305?

161 A. Yes. ComEd provided information indicating that the local utilities, property  
162 owners, governmental agencies and municipalities along the route have  
163 been notified.<sup>10</sup>

164 26. Q. Will the proposed transmission line require the acquisition of any land in fee?

165 A. No. With the exception of the one span of 138 kV into the Indeck facility, the  
166 new circuit will be installed on existing ComEd owned structures. ComEd is  
167 obtaining the needed property rights from Indeck for the one span of 138 kV  
168 line.<sup>11</sup>

169 27. Q. Will ComEd have to acquire any right-of-way easements for the proposed  
170 transmission line?

171 A. No.

172 28. Q. Has ComEd met all the criteria under Section 8-406(b), Part 1, of the Act in  
173 order to obtain a certificate?

174 A. Yes.

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<sup>8</sup> Response to Data Request ENG 1.1.

<sup>9</sup> Mr. Lorenz's Direct Testimony, page 4, lines 80-84.

<sup>10</sup> Application, Attachments C and D and Mr. Jones' Direct Testimony, pages 5-6, lines 115-145.

<sup>11</sup> Application, page 3, paragraph 9.

175 29. Q. What is your recommendation?

176 A. Given my review of ComEd's Application and taking my colleague Edmund  
177 W. Bliler's Direct Testimony into account, I recommend that ComEd be  
178 granted a Certificate of Public Convenience and Necessity to build, own,  
179 operate and maintain the approximately 1.5 miles of new 138 kV  
180 transmission line.

181 30. Q. Does this conclude your testimony?

182 A. Yes, it does.