

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY)
d/b/a Ameren Illinois)
Petition for a Certificate of Public Convenience) Docket No. 21-_____
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 and Related)
Facilities in Logan County, Illinois.)

VERIFIED PETITION

As part of its overall goal to improve the efficiency and reliability of its electric delivery system, Ameren Illinois Company d/b/a Ameren Illinois (AIC or Company) is proposing to construct a new, approximately 8-mile 138 kV transmission line (the Logan County Connector), which will connect the existing Fogarty Switching Station and Limit Substation. AIC will also expand the Limit Substation and modify the Fogarty Switching Station (together, the Logan County Connector and the substation improvements are referred to as the “Project”). The Project will improve energy reliability for local customers in Lincoln and the surrounding Logan County area.

Pursuant to Section 8-406 of the Illinois Public Utilities Act (Act), 220 ILCS 5/8-406, AIC seeks issuance of a Certificate of Public Convenience and Necessity (Certificate) authorizing AIC to construct, operate and maintain the Logan County Connector. AIC also requests an Order under Section 8-503 of the Act, 220 ILCS 5/8-503, directing construction of the Project. In support of this Petition, Ameren Illinois states as follows:

INTRODUCTION

1. AIC is an Illinois corporation and wholly-owned subsidiary of Ameren Corporation (Ameren). AIC owns, operates, controls and manages within the State of Illinois certain transmission and distribution facilities for the furnishing or delivery of electricity, and is therefore a “public utility” within the meaning of Section 3-105(a)(1) of the Act. AIC is engaged in the business of supplying electric power and energy throughout its certificated service territory within the State of Illinois and is therefore also an electric utility within the meaning of Section 16-102 of the Act.

2. Ameren Services Company (Ameren Services) is a Missouri corporation and wholly-owned subsidiary of Ameren. Ameren Services provides administrative support and services to Ameren and its operating companies, affiliates and subsidiaries, including the planning and operation of transmission facilities owned by AIC.

PROJECT DESCRIPTION

3. The Project addresses capacity and reliability needs by improving energy reliability for local customers in Lincoln and the surrounding Logan County area. These communities are currently supported by two Ameren Illinois 138 kV transmission lines located generally to the west of Lincoln (see Ameren Ex. 1.0, Figure 1). An outage or other contingency event on either of these two lines could result in extended restoration times and community-wide impacts around Lincoln, including loss of load (i.e., outages). Thus, Ameren Illinois sees continuing to rely on only these two transmission sources as creating a reliability concern in the Lincoln / Logan County area.

4. Ameren Illinois is thus proposing to construct the Logan County Connector, a new, approximately 8-mile 138 kV transmission line between Fogarty Switching Station and the

Limit Substation, with 2000 Amp minimum summer emergency capacity rating. AIC will also rebuild the existing 138 kV Limit Substation as a new ring bus to allow for the termination of the new line and expansion of the distribution assets to allow for load growth in the area and make certain minor modifications to the Fogarty Switching Station which are necessary to integrate the new transmission line. Completion of the Project will address this reliability concern by creating an additional energy pathway to the east side of Lincoln, effectively creating a 138 kV loop that will allow AIC to maintain service during contingency events on the two existing 138 kV lines.

5. AIC has identified two routes for the Logan County Connector: the “Preferred Route” and the “Alternate Route.” A map of the proposed Preferred and Alternate Routes, including the location of substations and related facilities, is provided as Petition Exhibit A and is legally described in Petition Exhibit B. AIC has conducted a comprehensive Routing Study and analysis (Ameren Ex. 2.2) to support its selection of the proposed routes. The Preferred Route represents the best combination of engineering feasibility, least cost, efficiency and mitigation of impacts on surrounding areas.

CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

6. Section 8-406(b) of the Act requires the Commission grant the requested Certificate if proposed construction “will promote the public convenience and necessity” as determined by three criteria: (i) need for the project; (ii) managerial, supervisory and technical capability; and (iii) financial capability. 220 ILCS 5/8-406(b).

The Need for the Project

7. Section 8-406(b) requires that “[t]he Commission shall determine that proposed construction will promote the public convenience and necessity only if the utility demonstrates:

(1) that the proposed construction is necessary to provide adequate, reliable, and efficient service to its customers and is the least-cost means of satisfying the service needs of its customers or that the proposed construction will promote the development of an effectively competitive electricity market that operates efficiently, is equitable to all customers, and is the least cost means of satisfying those objectives” 220 ILCS 5/8-406(b).

8. As indicated, the existing system in the Lincoln area is currently supported by two Ameren Illinois 138 kV transmission lines located generally to the west of Lincoln. A storm event, planned outage or other contingency on either of these two lines could result in extended restoration times and creates a risk of loss of load (i.e., outages) in Lincoln and Logan County. Thus, continuing to rely on only these two transmission sources creates reliability concern in the Lincoln / Logan County area. In the event of outages on certain existing facilities, the distribution system would enter into an overload condition and would not have the capacity to serve the load to the community. This would result in system outages with a potential for extended restoration times – due to the need for material procurement and construction. Completion of the Project addresses this reliability risk by creating an additional energy pathway to the east side of Lincoln, effectively creating a 138 kV loop that will allow AIC to maintain service during these type of contingency events.

9. The Logan County Connector provides an additional benefit because one of the two existing lines into the city needs to be rebuilt. Building the new Logan County Connector would allow for the 138 kV line to be rebuilt without an extended outage to customers served by the downstream substations. Additionally, construction of the Logan County Connector would result in the rebuilt 138 kV line being networked into the transmission system, thus eliminating a radial line and providing an alternate feed to other existing substations in Lincoln, including the

Limit Substation.

10. The Project is thus necessary to ensure continued adequate, reliable and efficient service, and is the least cost means of satisfying the service needs of AIC's customers within the Lincoln and the surrounding Logan County, considering engineering factors and environmental and land use impacts.

Managerial, Supervisory and Technical Capability

11. Section 8-406(b) requires "that the [public] utility is capable of efficiently managing and supervising the construction process and has taken sufficient action to ensure adequate and efficient construction and supervision" of the construction. 220 ILCS 5/8-406(b).

12. AIC is capable of efficiently managing and supervising the construction process for the Logan County Connector. Ameren Services and its personnel, on behalf of AIC and other Ameren affiliates, have many years of experience successfully overseeing the construction of transmission lines and related facilities. In fact, Ameren Services and its predecessors have been constructing transmission lines for decades, and have managed construction, re-construction, and rebuilding of hundreds of miles of transmission line. Ameren Services is or was responsible, on behalf of ATXI and AIC, for managing and supervising the construction of several significant transmission line projects approved by the Commission, including ATXI's Illinois Rivers Project (ICC Docket 12-0598) and Spoon River Project (ICC Docket 14-0514), and AIC's Faraday – PPG Project (ICC Docket 15-0064), Bondville-SW Campus Project (ICC Docket 12-0080) and McLean County Reliability Project (ICC Docket 18-0455).

13. Ameren Services, and, specifically, an Ameren Services Project Management Team, will manage the design and construction of the Project on behalf of AIC. Ameren

Services' Project Controls and Scheduling group and Construction Services group will support the project management team for the Project. Ameren Services will also employ contractors in various capacities for the Project, as it does routinely for transmission projects. It may also engage outside firms, to the extent necessary, to assist with management of the Project. The Project team has the necessary experience to efficiently manage and supervise the design and construction of the Project.

14. Ameren Services' Transmission Construction Services group will have primary responsibility of Project job site supervision. In addition to this full-time supervision, employees engaged in design engineering, construction controls, and safety will monitor construction. Finally, contractors selected for use in construction of the Project will be managed through field inspections, testing (as required), and construction review.

Financial Capability

15. Section 8-406(b) requires "that the utility is capable of financing the proposed construction without significant adverse financial consequences for the utility or its customers." 220 ILCS 5/8-406(b).

16. AIC is capable of financing the Project without significant adverse financial consequences. The estimated cost of the Logan County Connector is \$13-14 million, depending on route. The total estimated cost to construct the Project is \$22 million (assuming the Preferred Route is approved). No individual customer or any other group will directly reimburse AIC. Project facilities will be included in the Ameren Illinois transmission revenue requirement calculated under the MISO Tariff and recovered through MISO Schedule 9 from all transmission customers in the Ameren Illinois pricing zone.

17. AIC will finance the initial capital cash flow requirements for the Project with either available cash on hand or short-term borrowings, which would be available through drawings under a committed credit agreement, commercial paper issuances or short-term borrowings under Ameren's Utility Money Pool arrangement. AIC will replace the short-term borrowings with a permanent source of capital that includes a balanced blend of long-term debt and common equity. AIC's access to up to \$1 billion short-term debt from multiple low-cost sources, coupled with its ability to acquire long-term debt at favorable rates and on favorable terms, ensures that it not only can finance construction of the Project, but also can finance it at competitive cost.

18. Given its relatively small size in terms of total capital dollars, this Project will not affect AIC's ability to finance its on-going needs. AIC can finance the Logan County Connector and Project without adverse consequences for itself or its customers.

Project Route and Land Rights

19. AIC has conducted a comprehensive Routing Study and analysis to support its selection of the Logan County Connector Routes. The Routing Study is provided as Ameren Ex. 2.2 to the testimony of AIC witness Dan Schmidt.

20. AIC will need to acquire easements for the Logan County Connector, including all necessary and appurtenant land rights, such as rights of ingress and egress and access for vegetation management. As designed, the Preferred and Alternate Routes will require new permanent easements of 100 feet in width (except in certain circumstances where the Routes parallel road or interstate right of way), which is necessary to maintain all National Electrical Safety Code clearances. AIC may, depending upon route designation and final design, require

additional access or temporary construction easements. AIC requests that the Commission expressly find that the requested right-of-way width of 100 feet is reasonable and appropriate.

21. AIC is not seeking eminent domain authority in this proceeding. AIC will seek to acquire all necessary land rights by negotiation. However, to the extent land rights cannot be acquired after reasonable attempts to do so, AIC will seek approval to exercise eminent domain.

22. AIC is committed to working with landowners to mitigate the impact of the Logan County Connector on their interests. When feasible and consistent with the Commission-approved route location or by agreement of affected landowners, therefore, AIC may want to make adjustments to the Logan County Connector's route alignment or pole locations. In Docket 04-0514, the Commission acknowledged AIC's affiliate, ATXI's, "commitment to work with landowners to mitigate the impact of the [Spoon River Project] on their interests ..." and directed the utility to make similar adjustments for other similar pole placement concerns "[w]hen feasible and consistent with the Commission approved route location or by agreement of affected landowners..." Docket 14-0514, Final Order, Sept. 16, 2015, pg. 43-44. AIC therefore requests that it be similarly authorized to adjust the Logan County Connector's route alignment or pole locations, when feasible and consistent with the Commission-approved route location or by agreement of all affected landowners, without need for further Commission approval.

NOTIFICATIONS AND INFORMATIONAL REQUIREMENTS

23. While not seeking a Certificate under Section 8-406.1 of the Act, AIC is providing Section 8-406.1 informational requirements to facilitate Commission Staff's review, as shown in Ameren Ex. 1.1.

24. In accordance with Section 8-406(h) of the Act, 220 ILCS 5/8-406(h), AIC has

held a minimum of two pre-filing public meetings to receive public comment concerning the Logan County Connector in each county where the Logan County Connector is to be located, no earlier than six months prior to the date of this filing. The public meetings were held between February and May of 2021. Notice of each public meeting was published in a newspaper of general circulation within the affected county once a week for three consecutive weeks beginning no earlier than one month prior to the date of the first public meeting. Copies of the notices are included with the filing as Petition Exhibit C (also in Exhibit 3.1 to the testimony of Emily Hyland).

25. AIC also provided written notice of each public meeting, including a description of the Logan County Connector, to the clerk of each county where the Logan County Connector is to be located. Copies of the county clerk notices are included with the filing as Petition Exhibit D (also in Exhibit 3.1 to the testimony of Emily Hyland).

26. AIC also invited a representative of the Commission to each pre-filing public meeting in accordance with Section 8-406(h).

27. AIC established a dedicated website for the Logan County Connector at www.ameren.com/illinois/company/logan-county-connector prior to the first public meeting. The website address was and will be included in all public notices associated with the Logan County Connector and Project.

28. Pursuant to 220 ILCS 5/8-406(i) and 83 Ill. Admin. Code § 200.150(h), and in accordance with past Commission directives, a list containing the names and addresses of each owner of record of privately owned tracts of land, as identified in the records of the relevant county tax assessor, included in the right-of-way over which the AIC seeks to construct the

Preferred and Alternate Routes of the Logan County Connector, is included as Petition Exhibit E. Petition Exhibit E also includes the names and addresses certain other persons or entities potentially impacted by the Logan County Connector.

29. The Informational Packet required by 83 Ill. Admin. Code § 300.20 was submitted to the Commission on June 28, 2021.

30. In accordance with 83 Ill. Admin. Code Part 300.30, all landowners from whom rights-of-way must be acquired, as shown by the Records of the Tax Collector, will be sent a notice letter and “Statement of Information from the Illinois Commerce Commission Concerning Acquisition of Rights of Way by Illinois Utilities,” at least fourteen (14) days prior to any contact by AIC representatives for the purpose of seeking a right-of-way. The information contained in the letter and the Statement of Information will comply with the requirements of 83 Ill. Admin. Code Part 300.30.

31. AIC representatives will, subsequent to the fourteen (14) day notice mentioned previously, contact landowners, in person if possible, and discuss the Project in detail and inform them of the reason for the contact and the purpose of the Project, in accordance with the requirements of Part 300. Compensation will be offered, and the basis of that compensation will be explained to the affected landowners. Appraisals will be provided as applicable. AIC representatives will be available for discussion and negotiation as required by each landowner. Because AIC is responsible for the restoration of, or payment for, its damages to the property of landowners and tenants, each landowner will be notified prior to commencement of construction, and each property will be assessed for damage by AIC. Each landowner will be provided an AIC representative to contact to report damages.

32. Information required under 83 Ill. Admin. Code §§ 305.50(a)-(d) is provided on Petition Exhibit F.

33. Pursuant to 83 Ill. Admin. Code § 305.60, notice of the filing of this Petition has been sent to the utilities and railroads whose names and addresses are set forth in the list in Petition Exhibit G.

REQUEST FOR ORDER PURSUANT TO SECTION 8-503

34. Section 8-503 of the Act provides that whenever the Commission finds that additions to existing plant are necessary and ought reasonably be made, or that a new structure or structures ought to be erected, the Commission “shall make and serve an order authorizing or directing that such additions . . . be made, or structure or structures be erected” 220 ILCS 5/8-503.

35. Transmission reinforcements to support the Logan County Connector include the expansion of the Limit Substation and modification to the Fogarty Switching Station. The Limit Substation expansion and modification to the Fogarty Switching Station are necessary to connect the Logan County Connector to the grid.

36. The expansion of the existing Limit Substation will consist of building a new ring bus substation. The Fogarty Switching Station must install a new circuit breaker to allow for the proposed Logan County Connector.

37. For the reasons stated in this Petition and as is explained in AIC’s Direct Testimony and exhibits, construction of the Project, including the Logan County Connector, is necessary to ensure adequate, reliable and efficient service to AIC’s customers in the Lincoln and the surrounding Logan County area. The Limit Substation expansion and modification to

the Fogarty Switching Station are necessary to connect the Project to the grid.

38. Therefore, the Commission should authorize or direct construction of the Project pursuant to Section 8-503 of the Act.

REQUEST FOR SCHEDULE

39. The Logan County Connector is scheduled to be placed in service in 2023. AIC has developed a construction schedule that will allow it to meet the in-service date. In support of the in- service dates for the Project, AIC requests that the Commission issue a final order in this proceeding no later than March, 2022.

SUMMARY OF TESTIMONY

40. AIC supports this Petition with the pre-filed testimony of the following witnesses regarding the subject matters noted, which is filed simultaneously with this Petition:

<u>Ameren Exhibit No.</u>	<u>Witness</u>	<u>Subject of Testimony</u>
Ameren Exhibit 1.0	Ajay Jayaprakash	Logan County Connector (LCC) and Project overview; Need for LCC and Project; Managerial ability and supervision of construction; Cost of LCC and the Project; Ability to finance; Technical design; Required right of way; Regulatory commitments.
Ameren Exhibit 2.0	Dan Schmidt (HDR)	Siting and route selection process for LCC and the Project; Overview of environmental / cultural impact analysis.

Ameren Exhibit 3.0	Emily Hyland (HDR)	Public input process; Regulatory approvals and agency coordination.
Ameren Exhibit 4.0	Denise Thompson	Real estate matters.

REQUEST FOR RELIEF

WHEREFORE, Ameren Illinois respectfully requests that the Illinois Commerce Commission issue a final order no later than March, 2022: (i) granting a Certificate for the Logan County Connector pursuant to Section 8-406 of the Act, 220 ILCS 5/8-406; (ii) authorizing or directing construction of the Project pursuant to Section 8-503 of the Act, 220 ILCS 5/8-503; (iii) finding that the requested right-of-way width of 100 feet is reasonable and appropriate; and (iv) granting such other and further relief as the Commission deems just and necessary and as requested herein.

DATED: July 2, 2021

Respectfully submitted,

Ameren Illinois Company
d/b/a Ameren Illinois

/s/ Albert Sturtevant

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ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY)
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Necessity, pursuant to Section 8-406 of the Illinois Public)
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the Public Utilities Act, to Construct, Operate and)
Maintain a New High Voltage Electric Service Line and)
Related Facilities in Logan County, Illinois.)

VERIFICATION BY CERTIFICATION

Under penalties as provided by law pursuant to § 1-109 of the Code of Civil Procedure, 735 ILCS 5/1-109, the undersigned certifies that the statements set forth in this instrument are true and correct to the best of their knowledge and belief formed after a reasonable inquiry, except as to matters therein stated to be on information and belief and as to such matters the undersigned certifies as aforesaid that they verily believe the same to be true.


Eric Dearmont