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Exhibit No 053

Issues FERC 7-Factor Test Witness Edward C Pleiffer Sponsoring Party
Lype of Exhibit
Case No
Date Testimony Prepared

Sponsoring Party
Union Electric Company
Direct Testimony
LR-2008-23/9
April 1 2008

### MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. ER-2008-03/8

**DIRECT TESTIMONY** 

**OF** 

**EDWARD C. PFEIFFER** 

ON

**BEHALF OF** 

UNION ELECTRIC COMPANY d/b/a AmerenUE

> St Louis, Missouri April, 2008

> > America Exhibit No. 53
> >
> > Case No(s). El -2008-0318
> >
> > Date 12-8-08 Rptr 46

1		DIRECT TESTIMONY
2		OF
3		EDWARD C. PFEIFFER
4		CASE NO. ER-2008
5	Q.	Please state your name and business address.
6	Α	Edward C Pfeiffer, Ameren Services Company ("Ameren Services"), One
7	Ameren Plaz	ra, 1901 Chouteau Avenue, St. Louis, Missouri 63103
8	Q.	What is your position with Ameren Services?
9	Α	I am the Manager of the Electric Planning Department
10	Q.	Please describe your educational background, work experience and
11	duties of yo	ur position.
12	Α	After receiving Bachelor of Science and Master of Science degrees in Electric
13	Systems and	Science Engineering from Southern Illinois University in Carbondale, I began
14	my career w	1th Union Electric Company ("UE") in 1978 I worked for UE as an Engineer in
15	the Transm	ssion Planning Department for approximately 20 years 1 am a registered
16	professional	engineer in the State of Missouri
17		After the merger of Central Illinois Public Service Company and UE and the
18	formation o	f Ameren Services in connection with that merger, I became an employee of
19	Ameren Ser	vices and assumed my role as the Manager of the Electric Planning Department
20	Among other	er responsibilities, the Electric Planning Department is responsible for both
21	operational	and expansion planning for the Union Electric Company d/b/a AmerenUE
22	("AmerenUl	E" or "Company") transmission system The Electric Planning Department is
23	also respons	sible for compliance with applicable Federal Energy Regulatory Commission

- 1 ("FERC") requirements relating to the transmission system, including for the proper
- 2 classification of the Company's energy delivery facilities as distribution or as transmission in
- 3 accordance with FERC requirements

### 4 Q. What is the purpose of your direct testimony in this proceeding?

A The purpose of my testimony is to discuss AmerenUE's classification of its energy delivery facilities in accordance with the 7-Factor Test prescribed by the FERC, and to request a Commission determination confirming the Company's application of the 7-Factor Test to its energy delivery facilities. The Company is making this request solely to comply with a requirement in the Agreement of Transmission Facilities Owners to Organize the Midwest Independent Transmission System Operator, Inc., a Delaware Non-Stock Corporation (the "TO Agreement"), to which the Company is a party by virtue of its participation in the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO") Specifically, the TO Agreement requires the Company, as a "Transmission Owner" within the Midwest ISO, to request this determination from its state regulatory commission

### Q. What is the FERC 7-Factor Test?

A The 7-Factor Test was established by the FERC in its Order No 888 as a basis to determine the classification of facilities as either local distribution or transmission. The factors are as follows

An Executive Summary of my testimony is attached hereto as Attachment A

1	1	Local distribution facilities are normally in close proximity to retail
2 3	2	customers
<i>3</i>	2 3	Local distribution facilities are primarily radial in character  Power flows into local distribution systems, it rarely, if ever, flows out
5	4	When power enters a local distribution systems, it is not reconsigned or
6	·	transported on to some other market
7	5	Power entering a local distribution system is consumed in a comparatively
8		restricted geographical area
9	6	Meters are based at the transmission/local distribution interface to measure
10	_	flows into the local distribution system
11	7	Local distribution systems will be of reduced voltage
12	0	Has Amount IE applied the EEDC 7 Factor Test in classifying its analysis
13	Q.	Has AmerenUE applied the FERC 7-Factor Test in classifying its energy
14	delivery faci	hties between distribution and transmission?
15	Α	Yes The Midwest ISO TO Agreement defines an "Owner" as "a utility or
16	other entity v	which owns, operates, or controls facilities for the transmission of electricity in
17	interstate cor	nmerce (as determined by the Midwest ISO by applying the 7-Factor Test set
18	forth in FER	C Order No 888, 61 Fed Reg 21,540, 21,620 (1996), or any successor test
19	adopted by t	he FERC) and which is a signatory to [the TO] Agreement." TO Agreement,
20	Article I, Sec	ction J The TO Agreement requires that the facilities comprising an Owner's
21	transmission	system, defined in accordance with the FERC 7-Factor Test, be identified in
22	Appendix H	of the TO Agreement AmerenUE has applied the FERC 7-Factor Test in
23	classifying it	s energy delivery facilities between distribution and transmission and provided
24	the Midwest	ISO with a list of AmerenUE's transmission system facilities, which in turn has
25	been identifi	ed in Appendix H of the TO Agreement, as required by its terms The list of
26	AmerenUE's	transmission system facilities is attached to my testimony as Schedule ECP-E1
27	Q.	Does this conclude your direct testimony?
28	Α	Yes, it does

## BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

In the Matter of Union Electr d/b/a AmerenUE for Authori Tariffs Increasing Rates for E Service Provided to Custome Company's Missouri Service	ty to File Electric ers in the	) ) ) )	Case No ER-2008
AFF	IDAVIT OF E	EDWARD C	. PFEIFFER
STATE OF MISSOURI	)		
CITY OF ST. LOUIS	) ss )		
Edward C Pfeiffer, being fire	st duly sworn o	on his oath, s	tates
1 My name is E	dward C Pfeif	fer I work i	n the City of St Louis, Missouri, and
I am employed by Ameren Se	ervices Compa	ny as the Ma	anager of the Electric Planning
Department			
2 Attached here	to and made a	part hereof f	or all purposes is my Direct
Testimony on behalf of Union Electric Company d/b/a AmerenUE consisting of 3 pages,			
Attachment A, and Schedule ECP-E1, all of which have been prepared in written form for			
introduction into evidence in the above-referenced docket			
3 I hereby swea	r and affirm th	at my answe	rs contained in the attached testimony
to the questions therein propounded are true and correct			
			100/1/
			Edward C Pferfer
Subscribed and sworn to before me this / day of April, 2008			
	(	Deles	* Patterior
My commission expires			/ Notary Public
	NOTARY P Sto St My Commiss	RA K PATTERSON PUBLIC NOTARY the of Missouri Lous County sion Expires Oct hission # 044822	3) 2008

## **EXECUTIVE SUMMARY**

### Edward C. Pfeiffer

Manager of the Electric Planning Department for Ameren Services Company

\* \* \* \* \* \* \* \* \*

The purpose of my testimony is to discuss AmerenUE's classification of its energy delivery facilities in accordance with the 7-Factor Test prescribed by the Federal Energy Regulatory Commission ("FERC") and to obtain a Commission determination confirming the Company's application of the 7-Factor Test to its energy delivery facilities. The Company is making this request solely to comply with a requirement in the Agreement of Transmission Facilities Owners to Organize the Midwest ISO (the "TO Agreement"), to which the Company is a party by virtue of its participation in the Midwest Independent Transmission System Operator, Inc. ("Midwest ISO") Specifically, the TO Agreement requires the Company, as a "Transmission Owner" within the Midwest ISO, to obtain this determination from its state regulatory commission.

AmerenUE has classified its energy delivery systems in accordance with the FERC 7-Factor Test. AmerenUE has provided a list of its transmission facilities classified according to the FERC 7-Factor Test to the Midwest ISO, as required by the Midwest ISO TO Agreement. That list is identified in Appendix H of the TO Agreement, as required by Appendix H, and is also attached to my direct testimony as Schedule ECP-E1

### 345 kV Lines

LINE NAME	
Belleau-Montgomery-6	
Bland-Franks-3	
Callaway-Bland-1	
Callaway-Loose Creek-2	
Kelso-Lutesville-1	
Labadie-Bland-3	
Labadie-Montgomery-4	
Labadie-Tyson-1	
Labadie-Tyson-2	
Loose Creek-Franks (AECI)-1	Note 2
Lutesville-St Francois-1	j
Mason-Labadie-3	İ
Mason-Labadie-4	
Mason-Sioux-7	,
Montgomery-Callaway-7	ŀ
Montgomery-Callaway-8	
Montgomery-Spencer Creek-1	
Montgomery-Overton-5	Note1
Palmyra Tap-Palmyra	ł
Palmyra Tap-Substation T-1	
Rush Island-St Francois-1	ſ
Rush Island-St Francois-2	ł
Rush Island-Tyson-1	
Rush Island-Tyson-2	[
Spencer Creek-Palmyra Tap	
Sioux-Belleau-6	}
Substation T-Hills-6	]
Sioux-Roxford-5	}

### 161 kV Lines

LINE NAME	
LINE NAME	
Adair-Appanoose(MEC)-2	Note 2
Barnett(AECI)-California-1	Note 2
Big Creek(AECI) - Warrenton -3	Note 2
California-Overton-1	
Cape-Joppa(EEI)-1	Note 2
Cape-Kelso-2	
Cape - Kelso - 3	i
Clark - Cominco - 2	1
Clark - Pilot Knob - 1	1
Cottleville(AECI) - Highway N	Note 2
Dardenne(AECI - Highway N	Note 2
Eldon - Barnett(AECI) - 1	Note 2
Fletcher (AECI)- Cominco-1	Note 2
Fletcher (AECI)- Pilot Knob-2	Note 2
Fletcher (AECI)- Sweetwater-3	Note 2
General Motors - Point Prairie-3	1
Guthrie - Overton - 3	1
Kelso - Miner - 2	1
Kelso - Stoddard - 3	1
Maurer Lake-Carrollton(KCPL)-4	Note 2
Mid Rivers - Cottleville(AECI) -1	Note 2
Mid Rivers-Enon(AECI)-1	Note 2
Miner - Sikeston (SPA)- 1	Note 2
Missouri City(KCPL)-Maurer Lake-5	Note 2
Montgomery - Guthrie - 3	]
Moreau-Apache Flats 161 kV	
Osage - Eldon - 1	ł
Overton - Moberly - 1	}
Overton-Sedalia(MPS)-1	Note 2
Palmyra-N Marblehead-1	
Palmyra - Viele (ALTW)- 2	Note 2
Pike - Palmyra - 2	
Point Prairie-Big Creek(AECI)-3	Note 2
Salisbury (KCP&L) -Moberly-10	Note 2
Thomas Hill(AECI)-Adair-1	Note 2
Troy(AECI) - Pike - 1	Note 2
Warrenton - Montgomery - 3	3

### 161/138 kV Lines

LINE NAME		
Belleau - General Motors - 3		
Belleau - Troy(AECI) - 1		
Rivermines-Cape-1		

- --- Dardenne 138/161 kV transformer in series with line
- --- Dardenne 138/161 kV transformer in series with line. Note 2
- --- Fredericktown 138/161 kV transformers in series with line
- Note 1. McCredie Tap on Montgrmery-Overton-5 is a tie with AECI
- Note 2. This line is owned by UE and the non-Ameren company who's abbreviation is in parentheses

#### 138 kV Lines

### LINE NAME Arnold-Meramec-3 Ashley-Venice-2 Belleau - General Motors - 3 Belleau - Pike - 1 Baumgartner-Watson-1 Berkeley-Sioux-1 Berkeley-Sloux-2 Cahokia-Ashley-2 Cahokia-Central-1 Cahokia-Central-2 Cahokia-Meramec-1 Canokia-Meramec-2 Campbell-Maline-1 Campbell-Maline-2 Central-Watson-1 Clark-Osage-2 Clark-Pea Ridge-3 Conway-Tyson-3 Conway-Tyson-4 Dupo Ferry-Selma-1 Franklin-Tegeler-1 Grand Tower-Perryville-1 Gray Summit-Franklin-1 Gray Summit-Franklin-2 Hall Street-Ashley-1 Huster-McClay-1 Huster-Belleau-3 Maries-Osage-1 Marshall-Lakeshire-4 Marshall-Tyson-1 Marshall-Tyson-2 Mason-Gray Summit-1 Mason-Gray Summit-2 Mason-McClay-9 Mason-Meramec-1 Mason-Meramec-2

#### 138 kV Lines

LINE NAME		
McClay-Belleau-1		
Meramec-Baumgartner-1		
Meramec-Sandy Creek-1		
Meramec-St Francois-2		
Meramec-Watson-2		
Page-Berkeley-1		
Page-Berkeley-2		
Page-Mason-1		
Page-Mason-2		
Page-Sioux-4		
Page-Warson-5		
Page-Warson-6		
Rivermines-Cape-1		
Rivermines-Clark-2		
Rivermines-Maries-1		
St Francois - New Bourbon-1		
St Francois-Rivermines-1		
St François-Rivermines-2		
St Francois-Rivermines-3		
St Genevieve-Rivermines-1		
Sandy Creek-St Francois-1		
Selma-Rivermines-2		
Sioux-Huster-1		
Sioux-Huster-3		
Sioux-Maline-3		
Sioux-Maline-4		
Sioux-Roxford-1		
Sioux-Roxford-2		
Sioux-South Quincy-4		
Tegeler-Osage-1		
Tyson-Arnold-3		
Tyson-Meramec-4		
Venice-Campbell-1		
Venice-Campbell-2		
Warson-Mason-3		
Warson-Mason-4		

Note 2. This line is owned by UE and the non-Ameren company who's abbreviation is in parentheses

### **Substations at Production Plants**

	For Specified Voltage(s) Only
SUBSTATION NAME	kV
CALLAWAY PLANT	345
LABADIE PLANT	345
MERAMEC PLANT	138
OSAGE PLANT	138
RUSH ISLAND PLANT	345
SIOUX PLANT	345/138

### **Substations - Voltage Tie**

- Japonanono Tonago no		
	For Specified	
	Voltages Only	
SUBSTATION NAME	kV	
BELLEAU	345/138	
CAMPBELL	345/138	
CLARK	161/138	
DARDENNE	138/161	
FREDERICKTOWN	161/138	
GRAY SUMMIT	345/138	
KELSO	345/161	
MASON	345/138	
MONTGOMERY	345/161	
OSAGE	138/161	
OVERTON	345/161	
ST FRANCOIS	345/138	
TYSON	345/138	
WILDWOOD	345/138	

Substations - Switching and Bulk

Substations - Switching a	
	For Specified
SUBSTATION MAKE	Voltage Only
SUBSTATION NAME	kV
ADAIR ARNOLD	161
	138
ASHLEY	138
BAUMGARTNER	138
BERKELEY	138
BLAND	345
BLANCHETTE	138
BOYD BRANCH	138
BRUSHY CREEK	138
CALIFORNIA	161
CAMPBELL	345
CAPE GIRARDEAU	161
CENTRAL	138
COMINCO MINE	161
CONWAY	138
ELDON	161
EUCLID	138
FRANKLIN	138
GASCO	138
GENERAL MOTORS	161
GUTHRIE	161
HALL STREET	138
HIGHWAY N	161
HUNTER	138
HUSTER	138
LAKESHIRE	138
LOOSE CREEK	345
LOY MARTIN	161
LUTESVILLE	345
MALINE	138
MARION	138 & 161
MARSHALL	138
MAURER LAKE	161
MCCLAY	138
MID RIVERS	161
MINER	161
MOBERLY	138
NORTH FARMINGTON	138
PAGE	138
PHELPS	138
PIKE	161
PILOT KNOB	161
POINT PRAIRIE	161
	161

Substations - Switching and Bulk

Cabatations - Owitening and Daik		
gr gr	For Specified	
er	Voltage Only	
SUBSTATION NAME	kV	
RIVERMINES	138	
SANDY CREEK	138	
SELMA	138	
SPENCER CREEK	345	
STODDARD	161	
SWEETWATER	161	
VIBURNUM	161	
TEGELER	138	
WARRENTON	161	
WARSON	138	
WATSON	138	