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Witness: Ross Hohlt
Sponsoring Party: Ameren Transmission
Company of Illinois
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MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2018-0327

DIRECT TESTIMONY

OF

ROSS HOHLT

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

**St. Louis, Missouri
August 23, 2018**

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DIRECT TESTIMONY

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ROSS HOHLT

CASE NO. EA-2018-0327

1 **I. INTRODUCTION**

2 **Q. Please state your name, business address, and present position.**

3 A. My name is Ross Hohlt. My business address is 1901 Chouteau Avenue, St.
4 Louis, Missouri 63103. I am a Consulting Engineer in the Transmission Planning Department
5 within Ameren Services Company ("Ameren Services"). I am testifying in this proceeding on
6 behalf of Ameren Transmission Company of Illinois ("ATXI").

7 **Q. Please summarize your professional experience and educational**
8 **background.**

9 A. I graduated from Saint Louis University with a Bachelor of Science degree in
10 Electrical Engineering in 2008. In 2008, I joined Ameren Services as an Associate Engineer
11 in the Transmission Planning Department. Throughout the following ten years, I assumed
12 roles of increasing responsibility within the group. In 2012, I was promoted to Engineer. In
13 2014, I was promoted to Career Engineer, and, in 2017, I was promoted to my current role of
14 Consulting Engineer. I am a licensed Professional Engineer in the State of Missouri.

15 **Q. What are your duties and responsibilities in your present position?**

16 A. In my present position, I am responsible for reliability and economic analysis
17 of the bulk electric system in Missouri and Illinois and subsequent capital project scoping and
18 initiation, as well as supporting transmission business development activities, inter-regional
19 coordination between MISO and SPP, and resource adequacy assessments performed by SERC

1 and MISO. I also assist on special projects from time-to-time, such as the project that is the
2 subject of this proceeding.

3 **Q. Have you previously provided testimony before the Missouri Public**
4 **Service Commission?**

5 A. No, I have not.

6 **Q. What is the purpose of your testimony?**

7 A. The purpose of my testimony is to provide a transmission planning perspective
8 on the benefits of the proposed acquisition of assets from the City of Rolla acting by and
9 through its Board of Public Works (commonly referred to as Rolla Municipal Utilities or
10 "RMU") and the related construction of a new substation – the Dillon Substation – designed to
11 network the acquired facilities with assets owned by Union Electric Company d/b/a Ameren
12 Missouri ("Ameren Missouri") and Sho-Me Power Electric Cooperative ("Sho-Me"). The
13 proposed asset acquisition and construction activities (collectively "the Project") are described
14 in the direct testimony of ATXI witness Sean Black. I will discuss the benefits to the other
15 regional entities affected by the Project, including Ameren Missouri, RMU and the Sho-Me. I
16 will also discuss, from a transmission planning perspective, concerns with an alternative third-
17 party project proposal.

18 **Q. Are you sponsoring any schedules as a part of your direct testimony?**

19 A. Yes, I am sponsoring the following schedules:

- 20
 - **Schedule RH-01 (Confidential)** – a diagram showing the location of the
- 21 proposed Dillon Substation in relation to other Ameren Missouri circuits
- 22 and substations in the region.

1 • **Schedule RH-02 (Confidential)** – a diagram depicting an internal
2 alternative project design examined by ATXI.

3 • **Schedule RH-03 (Confidential)** - a diagram providing a general overview
4 of the third-party proposal.

5 **II. BENEFITS OF THE PROJECT**

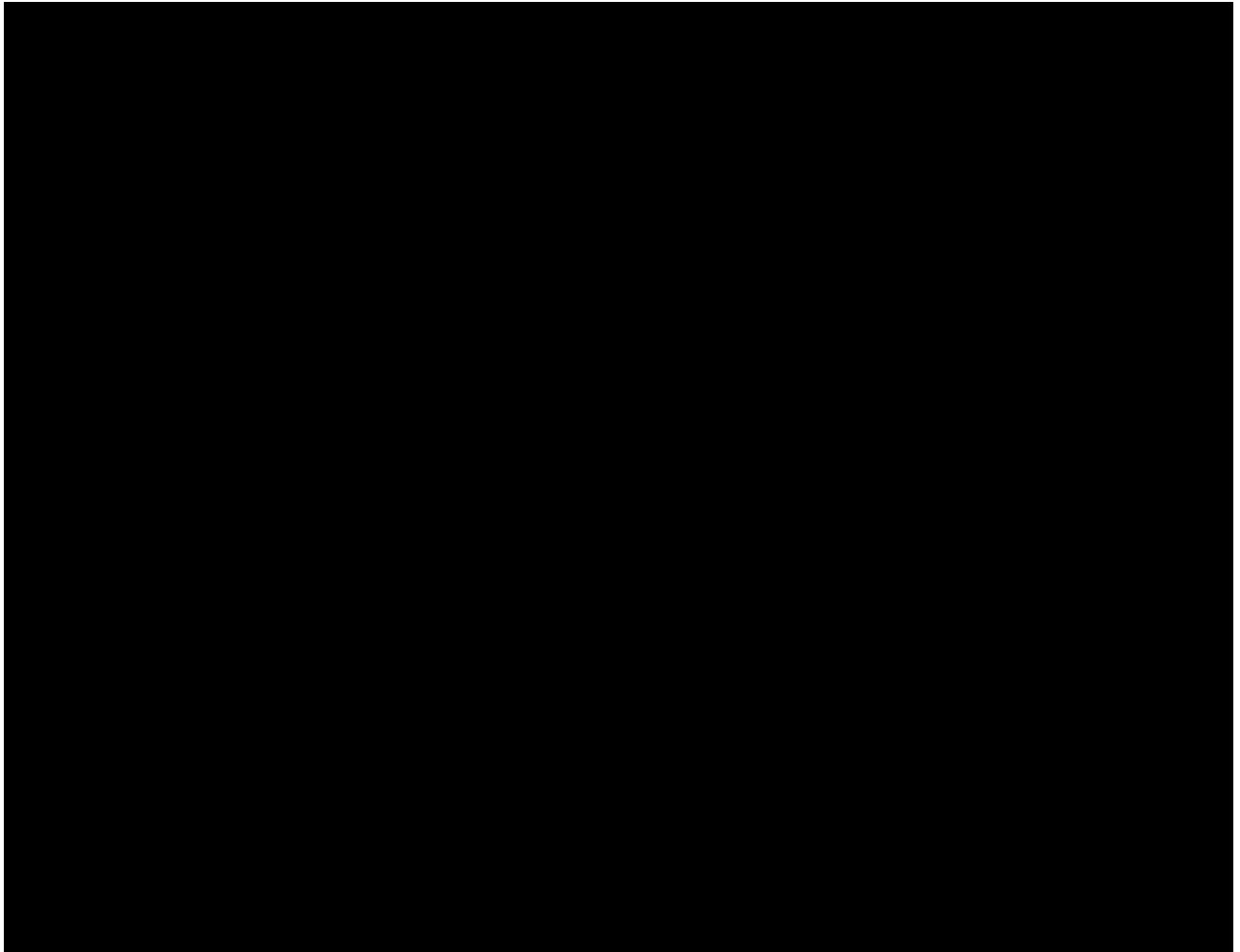
6 **Q. From a planning perspective, how does the Project increase reliability for**
7 **all entities involved?**

8 A. In general, the Project increases operational flexibility and ability to maintain
9 regional reliability with multiple facilities out of service. Specifically, the Project provides
10 benefits to Ameren Missouri by segmenting the Clark-Osage-2 line, thereby reducing fault
11 exposure to the Lakeside Substation and two Osage generating units. The Project provides
12 benefits to RMU because an outage of Ameren Missouri's double circuit transmission lines on
13 either side of the ring bus to be constructed at the new Dillon Substation would not result in
14 total RMU load outage at its Alfermann Substation, which is important to RMU and its
15 customers. Additional switching capability as a result of the installation of a 138 kV bus-tie
16 breaker at Alfermann also would allow RMU the ability to keep both of its 138/34 kV
17 transformers in service in the event of an outage of either 138 kV transmission source. That
18 also means both 138 kV lines at Alfermann would be able to remain in service in the event of
19 a transformer outage. Finally, the Project provides benefits to Sho-Me because installation of,
20 and connection to, a new 138/69 kV transformer would provide a new high-voltage source to
21 the coop's 69 kV system and address a projected reliability deficiency in the area.

22 **Q. Please comment further on the operational benefits of the Project as**
23 **applied to Ameren Missouri.**

1 A. The Rolla area is located roughly in the middle of the approximately 95-mile
2 Clark-Osage circuit. A line fault anywhere along that circuit would result in the loss of two
3 generating units at Osage and one of the two Lakeside Sub 138/34 kV transformers. Installing
4 a new substation along this circuit near Rolla reduces this exposure by approximately half.
5 The installation of the 138 kV capacitor bank located at the Dillon Substation and connection
6 to the adjacent Rivermines – Alfermann line would allow for increased voltage support to the
7 area in the event of line or generation outages. In addition, construction of the Dillon
8 Substation will provide additional switching capability, which will allow for greater operating
9 flexibility when Ameren Missouri and ATXI need to perform maintenance activities. As a
10 result, I view the Project as providing a substantial amount of reliability "upside" for Ameren
11 Missouri.

12 The following diagram [Confidential] shows the location of the proposed Dillon
13 Substation in relation to Ameren Missouri's Clark-Osage 2 circuit and other Ameren Missouri
14 substations in the region:



1

2 This diagram is also attached to my testimony as Schedule RH-01 (Confidential).

3 **Q. Is the Project required in order to comply with internal planning criteria**
4 **or to mitigate known or expected NERC compliance violations?**

5 A. No. Although I provide an overview of the operational benefits of the Project
6 to the involved entities, including Ameren Missouri, the Project is not required to comply with
7 internal planning criteria or to mitigate known or expected NERC compliance violations. But,
8 whether required or not, the Project has tangible benefits for Ameren Missouri and its
9 customers, as I discuss herein.

10 **Q. What operational benefits would the Project produce for RMU?**

1 A. Presently, RMU's Alfermann Substation is supplied via two 138 kV lines
2 connected independently to Ameren Missouri's Clark-Osage-2 and Rivermines-Maries-1 138
3 kV lines. These connections are hard taps, meaning there is no breaker protection. A fault on
4 either Ameren Missouri line would cause an outage to the connected RMU line. Because
5 Ameren Missouri's 138 kV lines are supported by common transmission towers, there is some
6 risk that both lines could be lost as a result of a single event. For example, if a vehicle were to
7 strike a tower where Ameren Missouri's lines cross Interstate 44 east of Rolla and cause
8 significant damage such that both lines would have to be taken out of service, the Alfermann
9 Substation would be totally disconnected from the transmission system¹. Segmenting these
10 lines and providing a dedicated position at Dillon Substation for the western supply line to
11 Alfermann will eliminate common tower risks to RMU's load and significantly reduce
12 exposure to single contingency events that would reduce Alfermann's load-serving capability.

13 **Q. Please comment further on the operational benefits the Project would**
14 **provide to Sho-Me.**

15 A. The Project provides benefits to Sho-Me because the construction of the Dillon
16 Substation would accommodate the installation of, and connection to, a new 138/69 kV
17 transformer at the existing Macedonia Substation. This new source to the local 69 kV network
18 would mitigate a projected reliability deficiency identified by Sho-Me. Allowing Sho-Me to
19 connect to a position that would be installed at the new Dillon Substation would help alleviate
20 these issues and add increased voltage support to the coop's system.

¹ I provide this example because this situation nearly materialized in August 2016. A truck traveling eastbound lost control and struck a lattice tower on the south side of the interstate. Although the accident caused significant damage to the structure, Alfermann did not lose service. We have, however, had difficulties scheduling permanent repairs to the facility, given the reliability issues implicated by the outages that would be required. These same concerns will not exist if the Project is constructed.

1 **Q. Would Sho-Me bear the cost of the real estate acquisition and line work**
2 **associated with this connection?**

3 A. Yes. Sho-Me would be responsible for costs associated with extending its
4 facilities to the new substation.

5 **III. ALTERNATIVE OPTIONS EXPLORED BY ATXI**

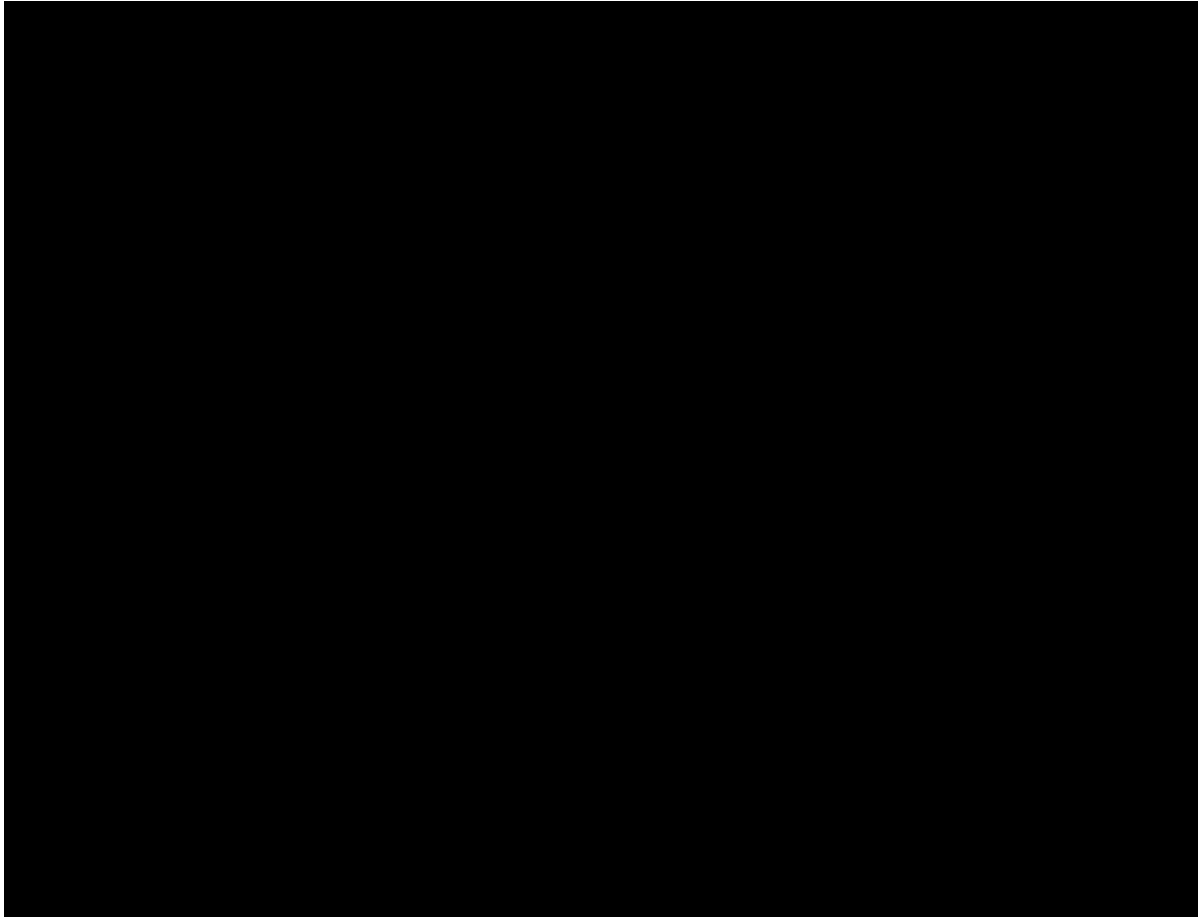
6 **Q. Did ATXI explore any alternatives to the Project that were ultimately**
7 **selected?**

8 A. Yes. ATXI explored two other possible alternatives – one internal alternative
9 and one third-party alternative - but ultimately concluded that those alternatives did not
10 accomplish all of the necessary objectives, or were not cost-effective.

11 **Q. Please describe in further detail the internal alternative ATXI explored.**

12 A. The internal alternative we considered would have required ATXI to construct
13 a new substation close to RMU's Alfermann Substation and then utilize the majority of RMU's
14 138 kV lines (the ones ATXI is proposing to acquire in this transaction) to loop Ameren
15 Missouri's Clark-Osage-2 circuit into and out of the new substation. This would have resulted
16 in two short, radial connections supplying Alfermann from the ATXI substation. Sho-Me
17 could then have tied into their nearby 69kV lines located to the west of the proposed substation
18 site.

19 On a map, this alternative would have looked something like the following:



1

2 This diagram is also attached to my testimony as Schedule RH-02 (Confidential).

3 **Q. What was the estimated cost of this alternative?**

4 A. Detailed cost estimates were never developed, but the high-level planning
5 estimate that was developed at the time this alternative was being considered was roughly
6 comparable to the high-level planning estimate of the option that was ultimately selected.

7 **Q. Why then was this option not selected?**

8 A. ATXI ultimately decided not to move forward with this option because it did
9 not accomplish all of the objectives sought by the affected parties. Having only two
10 transmission supplies to the new substation, the source to Sho-Me's 69 kV network would have
11 been weaker than the solution ultimately selected. In addition, RMU would have been left

1 with a total of approximately 1.5 miles of 138 kV conductor radially supplying the Alfermann
2 Substation, which was not preferable.

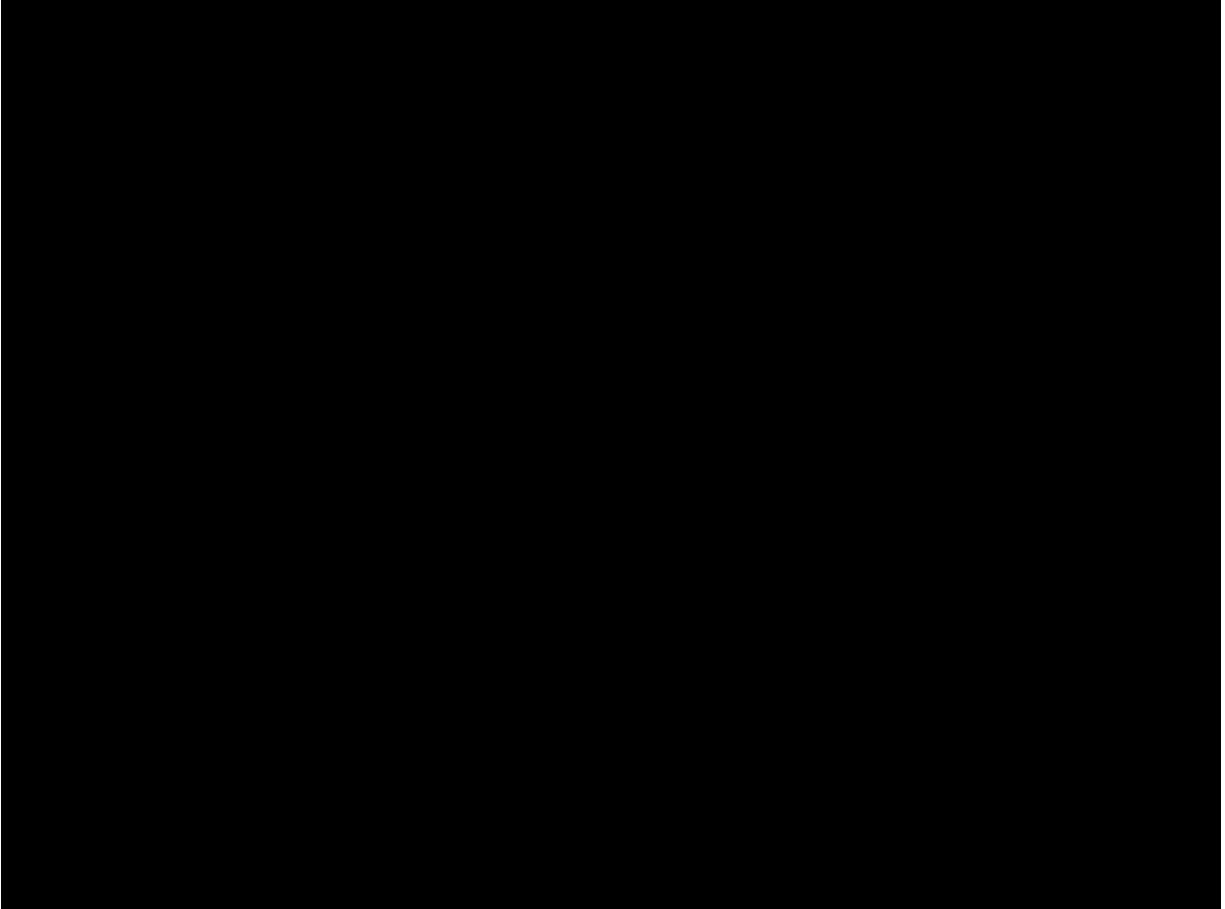
3 **Q. Are you aware of the third-party proposal referenced in Sean Black's**
4 **direct testimony?**

5 A. Yes, I am generally aware that RMU previously had discussions with another
6 transmission developer that proposed acquiring RMU's 138 kV assets and developing another
7 project in the area.

8 **Q. What is your understanding of the scope of that project?**

9 A. Although I was not privy to specifics, such as routing, it is my general
10 understanding that the third-party proposal involved disconnecting one of the RMU's lines
11 from Ameren Missouri's transmission system and connecting to Sho-Me via a new substation
12 and approximately 19 miles of new 161 kV line. A second new substation also would have
13 needed to have been constructed near the Phelps Substation to avoid the creation of a three-
14 terminal line on the Ameren Missouri Rivermines-Maries circuit.

1 Conceptually, this project would have looked something like the following:



2

3 This diagram is also attached to my testimony as Schedule RH-03 (Confidential).

4 **Q. Would a project of this magnitude have cost significantly more than the**
5 **one being proposed by ATXI?**

6 A. Yes. A project of this magnitude would have cost significantly more than
7 ATXI's current proposal – perhaps as much as double.

8 **Q. Would a project of this nature have provided the same benefits to all of the**
9 **parties involved?**

10 A. No, this alternative lacked the more robust operational benefits the selected
11 Project would provide to Ameren Missouri. While this project would have added breaker

1 protection to Ameren Missouri's Rivermines-Maries circuit, from a reliability perspective, it
2 would be much more beneficial to segment the Clark-Osage circuit for the reasons cited above.
3 This electrical configuration also introduced a possible double contingency scenario where the
4 RMU's load would be supplied by the Sho-Me's 69 kV network, which the system would not
5 have been able to support at most expected load levels.

6 **Q. Does this conclude your direct testimony?**

7 A. Yes, it does.

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

In the Matter of the Application of Ameren)
Transmission Company of Illinois for Authority)
To Acquire Electric Transmission Facilities from)
Rolla Municipal Utilities and for a Certificate of)
Public Convenience and Necessity to Own,)
Operate, Maintain, and Otherwise Control)
And Manage those Facilities.)

File No. EA-2018-0327

AFFIDAVIT OF ROSS HOHLT

STATE OF MISSOURI)
) ss
CITY OF ST. LOUIS)

Ross Hohlt, being first duly sworn on his oath, states:

1. My name is Ross Hohlt. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as Consulting Engineer in the Transmission Planning Department.
2. Attached hereto and made a part hereof for all purposes is my Direct Testimony on behalf of Ameren Transmission Company of Illinois consisting of 11 pages, and accompanying Schedule(s), if any, all of which have been prepared in written form for introduction into evidence in the above-referenced docket.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct.



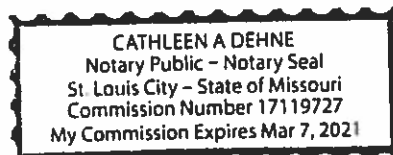
Ross Hohlt

Subscribed and sworn to before me this 13th day of August, 2018.



Notary Public

My commission expires: 3/7/2021



**SCHEDULE RH-01
IS CONFIDENTIAL
IN ITS ENTIRETY**

**SCHEDULE RH-02
IS CONFIDENTIAL
IN ITS ENTIRETY**

**SCHEDULE RH-03
IS CONFIDENTIAL
IN ITS ENTIRETY**