Exhibit No.: Issue: Witness: Sponsoring Party:

Case No.:

Transmission John E. Grotzinger Missouri Joint Municipal Electric Utility Commission Case No. EA-2005-0180

MISSOURI JOINT MUNICIPAL ELECTRIC UTILITY COMMISSION

Case No. EA-2005-0180

SURREBUTTAL TESTIMONY

OF

JOHN E. GROTZINGER

Columbia, Missouri February, 2005

BEFORE THE PUBLIC SERVICE COMMISSION OF THE STATE OF MISSOURI

Application of Union Electric Company for a Certificate of Public Convenience and Necessity authorizing it to construct, install, own, operate, control, manage and maintain electric plant, as defined in § 386.020(14), RSMo. to provide electric service in a portion of New Madrid County, Missouri, as an extension of its existing certificated area

Case No. EA-2005-0180

AFFIDAVIT OF JOHN E. GROTZINGER

STATE OF MISSOURI)) ss. COUNTY OF BOONE)

I, John E. Grotzinger, of lawful age, and being duly sworn, do hereby depose and state:

 My name is John E. Grotzinger. I am presently Executive Director for Engineering & Operations of the Missouri Joint Municipal Electric Utility Commission, intervener in the referenced matter.

 Attached hereto and made a part hereof for all purposes is my surrebuttal testimony.

3. I hereby swear and affirm that my answers contained in the attached testimony to the questions therein propounded are true and correct to the best of my personal knowledge, information and belief.

John E. Grotzinger

Subscribed and sworn to before me, a Notary Public, this H day of February, 2005.

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CATHERINE GEBERT Boone County My Commission Expires January 29, 2008

	Surrebuttal Testimony John E. Grotzinger
1	Surrebuttal Testimony
2	Of
3	John E. Grotzinger
4	
5	Case No. EA-2005-0180
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10	Q. Please State your name, employer, and business address.
11	A. My name is John E Grotzinger. I work in Columbia, Missouri and I am employed by the
12	Missouri Joint Municipal Electric Utility Commission (MJMEUC) as Executive Director for
13	Engineering & Operations.
14	My business address is 2407 W Ash, Columbia, MO.
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16	Q. Are you the same John E. Grotzinger who filed rebuttal testimony in this case?
17	A. Yes I am.
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19	Q. What is the purpose of your surrebuttal testimony?
20	A. The purpose of my testimony is to address several items in Dr. Proctor's testimony. They
21	included addressing the changes to transmission congestion.
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Surrebuttal Testimony John E. Grotzinger

Q. Does MJMEUC oppose the Ameren/Noranda transaction?

A. No, I want to repeat this point. MJMEUC does not oppose this transaction; AmerenUE can alleviate the transaction's detrimental effects on transmissions and should simply make commitments to do so or be required to do so by the MoPSC.

Q. Do you have comments regarding the response offered in Dr Proctor's rebuttal testimony in answer to the question? "Will the transmission system experience any changes in congestion from AmerenUE serving the Noranda load versus Noranda being served from another supplier?"

A. Yes, there *will* be changes in flow patterns and transmission congestion. However, in Dr. Proctor's rebuttal page 25 beginning line 16 he only addresses the load side. The physics are such that Noranda's load will be supplied locally from the New Madrid generators whatever the contract sources and could theoretically be supplied from the New Madrid units even if islanded from the rest of grid with no connection to Ameren at all. Ameren or whoever serves as being the contracted source does not change the local flows to Noranda. However, this does not recognize how the contracted power supply sources change the broader regional flows and the transmission modeling that will determine availability of transmission to other utilities and customers. In Mr. Pfeiffer's testimony Attachment 2 page 3 he documents changes to flows on transmission branches by over 50 MW. This is based upon changing the modeled generation sources to reflect how the contracted generation sources will change. MISO modeling is expected to model generators that are contracted or otherwise obligated to provide for Noranda. In Dr. Proctor's testimony page 27 line 21 he acknowledges that east to west flows will be increased as part of the Noranda modeled transaction. My concern is that not only does it change the transmission congestion, which all generation shifts change, but by increasing the east to

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Surrebuttal Testimony John E. Grotzinger

west flow it negatively impacts utilities (including municipalities') ability to obtain firm transmission service in that direction.

Q Will other Missouri utilities find it more difficult to obtain long term firm transmission service if AmerenUE serves the Noranda Load?

A. In Dr Proctor's testimony page 28 line 2 he indicates that utilities located west of Ameren would find it more difficult to obtain transmission from the east. I agree that until transmission constraints are relieved transmission services from sources in Ameren or farther east will be more difficult to take west to AECI, Aquila(MPS), KCPL, etc. I noted in my testimony that MJMEUC was recently denied 5 MW from Ameren to MPS in my Attachment 1 indicating that there are already limitations in this direction. In my testimony I provided a plan to mitigate the impacts. The improvements I identified would offset any additional congestion impacts of the Ameren/Noranda transaction.

Q Does that conclude your testimony?

A. Yes it does.