

Exhibit: Issue(s)	CCN for Ameren High Prairie Project
Type of Exhibit:	Written Surrebuttal Testimony
Witness:	Dr. Janet Haslerig
Sponsoring Party:	Missouri Department of Conservation
File No.:	EA-2018-0202
Date Testimony Prepared:	Sept. 28, 2018

**MISSOURI PUBLIC SERVICE COMMISSION**

**FILE NO.EA-2018-0202**

**WRITTEN SURREBUTTAL TESTIMONY**

**OF**

**DR. JANET HASLERIG**

**ON**

**BEHALF OF**

**MISSOURI DEPARTMENT OF CONSERVTION**

**SEPTEMBER 28, 2018**

**\*\*\*DENOTES HIGHLY CONFIDENTIAL INFORMATION\*\*\***

**SURREBUTTAL TESTIMONY OF DR. JANET HASLERIG**  
**MISSOURI DEPARTMENT OF CONSERVATION**  
**CASE NO. EA-2018-0202**

1 **Q. Please state your name, title and business address.**

2 A. Janet Haslerig, Ph.D., Resource Scientist, Missouri Department of Conservation, P.O.  
3 Box 180, Jefferson City, Missouri 65102-0180.

4 **Q. Have you previously submitted testimony in this proceeding before the Missouri**  
5 **Public Service Commission?**

6 A. Yes. I submitted Rebuttal Testimony on August 20, 2018. My professional background  
7 and qualifications are contained in that prior testimony.

8 **Q. What is the purpose of your Surrebuttal Testimony?**

9 A. My Surrebuttal Testimony is provided in response to portions of the rebuttal testimony of  
10 the Office of the Public Counsel ("OPC").

11 **Q. Do you agree with OPC's recommendations as set forth by Dr. Marke in his**  
12 **Rebuttal Testimony?**

13 I agree that Ameren should have to obtain an incidental take permits for both bats and eagles,  
14 and that monitoring and reporting is important as well. However, I have additional concerns  
15 about the locations of the turbines.

1 **Q. Please explain.**

2 **A.** Based upon shapefiles received from Ameren on September 19, 2018 (Response to MDC  
3 Data Request No. 17), I have determined that there are \*\*\* \_\_\_\_\_

4 \_\_\_\_\_ \*\*\* that are within 2-miles of turbines.

5 *See* Figure 1 below. This additional information affirms and elevates my previous concerns and  
6 recommendations. Based upon this additional information, I recommend that there be a two-mile  
7 buffer around known (present and future) eagle and unknown raptor nests (until or if a definitive  
8 identification can be determined to eliminate these nests as potential bald eagle nests) within the  
9 Project Area. By "buffer," I mean land where turbines cannot be constructed (or if already  
10 constructed, cannot operate). Two miles is necessary to protect eagles from collisions within  
11 their adjacent foraging area. This buffer should also protect any nearby alternate nests.

Figure 1. Eagle, Raptor Nests and Turbines \*\*\*

1 \*\*\*

2 **Q. Does the additional information you received about nest and turbine locations affect**  
3 **your previous recommendations or concerns?**

4 **A.** Yes. Based upon my review of the data, I have confirmed that there are \*\*\* \_\_\_\_\_  
5 \_\_\_\_\_ \*\*\* that are in the Project Area and located from \*\*\* \_\_\_\_\_  
6 \_\_\_\_\_ \*\*\* miles from turbines and \*\*\* \_\_\_\_\_ \*\*\*  
7 within \*\*\* \_\_\_\_\_ \*\*\* of the Project Area. This additional information confirms my previous  
8 concerns and supports my recommendation to conduct post-construction monitoring of eagle  
9 fatality and disturbances in accordance with United States Fish and Wildlife Service Eagle  
10 Conservation Plan Guidelines.

1 Q. Does this conclude your testimony?

2 A. Yes.

BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI

In the Matter of the Application of Union Electric  
Company d/b/a Ameren Missouri for Permission and  
Approval and a Certificate of Convenience and Necessity  
(Authorizing it to Construct a Wind Generation Facility )

Case No. EA-2018-0202

AFFIDAVIT OF DR. JANET HASLERIG

STATE OF MISSOURI )

COUNTY OF COLE )

Dr. Janet Haslerig being first duly sworn on her oath, states:

1. My name is Dr. Janet Haslerig. I work in Jefferson City, Missouri, and am employed at the Missouri Department of Conservation as a Resource Scientist.
2. Attached to this affidavit and made apart hereof for all purposes is my Written Surrebuttal Testimony (testimony) on behalf of Missouri Department of Conservation. The testimony consists of \_\_\_pages, which have been prepared in the appropriate format to be introduced into evidence in the case above.
3. I hereby swear and affirm that my answers contained in the attached testimony to the questions promulgated therein are true and correct.

  
\_\_\_\_\_  
Dr. Janet Haslerig

Sworn to and subscribed before me this 28<sup>th</sup> day of September, 2018.

  
\_\_\_\_\_  
Notary Public

My Commission Expires: 11-13-19

