Exhibit No.:	
Issues:	Public Comment Summary
Witness:	Natelle Dietrich
Sponsoring Party:	MO PSC Staff
Type of Exhibit:	Rebuttal Testimony
Case No.:	EA-2015-0146
Date Testimony Prepared:	October 21, 2015

MISSOURI PUBLIC SERVICE COMMISSION

COMMISSION STAFF DIVISION

REBUTTAL TESTIMONY

OF

NATELLE DIETRICH

AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2015-0146

Jefferson City, Missouri
October 2015

BEFORE THE PUBLIC SERVICE COMMISSION

OF THE STATE OF MISSOURI

In the Matter of the Application of Ameren Transmission Company of Illinois for Other Relief or, in the Alternative, a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345,000-volt Electric Transmission Line from Palmyra, Missouri to the Iowa Border and an Associated Substation Near Kirksville, Missouri	)))))))))	Case No. EA-2015-0146

AFFIDAVIT OF NATELLE DIETRICH

STATE OF MISSOURI)
) **ss**
COUNTY OF COLE)

COMES NOW Natelle Dietrich and on her oath declares that she is of sound mind and lawful age; that she contributed to the attached Rebuttal Testimony; and that the same is true and correct according to her best knowledge and belief.

Further the Affiant sayeth not.

Natelle Dietrich

Subscribed and sworn to before me this 21st day of October, 2015.

SUSAN L. SUNDERMEYER
Notary Public - Notary Seal
State of Missouri
Commissioned for Callaway County
My Commission Expires: October 28, 2018
Commission Number: 14942086

Notary Public

REBUTTAL TESTIMONY

OF

NATELLE DIETRICH

AMEREN TRANSMISSION COMPANY OF ILLINOIS

CASE NO. EA-2015-0146

Q. Please state your name and business address.

A. My name is Natelle Dietrich. My business address is 200 Madison Street, Jefferson City, MO 65101.

Q. By whom are you employed and in what capacity?

A. I am employed by the Missouri Public Service Commission as Staff Director.

Q. Please describe your education and relevant work experience.

A. I received a Bachelor of Arts Degree in English from the University of Missouri, St. Louis and a Master of Business Administration from William Woods University. During the early years of my tenure with the Commission, I worked in many areas of telecommunications regulation. In October, 2007, I became the Director of Utility Operations. The division was renamed the Tariff, Safety, Economic and Engineering Analysis Department in August 2011. In that position, I oversaw the technical staff of the Energy, Water and Sewer, Telecommunications and Manufactured Housing Units. On October 1, 2015, I was named the Staff Director, which includes oversight of the technical staff, auditing staff and Staff Counsel's Office.

My responsibilities include activities related to implementing sound energy policy in Missouri. I was the lead director for the Commission's rulemakings on the implementation and rewrite of the Missouri Energy Efficiency Investment Act, the Chapter 22 rewrite and the

Commission's regulations related to renewable energy. I am the director on activities related to transmission issues, cybersecurity and infrastructure security issues and environmental compliance issues. Relevant activities relate to general transmission issues, Missouri compliance efforts respecting the Federal Clean Power Plan (Section 111(d)), energy efficiency, demand-side management, demand response and smart grid. I was a member of the Missouri Delegation to the Missouri/Moldova Partnership through National Association of Regulatory Utility Commissioners ("NARUC") and the U.S. Agency for International Development.

I am a member of the NARUC Staff Subcommittee on Telecommunications, and in that capacity I have served as First Vice Chair and assisted on the Federal Legislation Subgroup. I serve on the Staff of the Federal/State Joint Board on Universal Service, as lead Staff for the Missouri Universal Service Board and was a member of the Governor's MoBroadbandNow taskforce.

Q. Have you previously testified before the Commission?

A. Yes. My Case Summary is attached as Attachment ND-R-1.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to provide a high level summary of the written public comments submitted to the Commission's Electronic Filing and Information System ("EFIS") in response to ATXI's request for a certificate of public convenience and necessity authorizing it to construct, own, operate, maintain, control and manage electric transmission facilities from a substation near Palmyra, Missouri, and extending through Marion, Shelby, Knox and Adair Counties, to a new substation located near Kirksville, Missouri (the Zachary Substation) and proceeding through Schuyler County to a connection point on the Iowa

border, together with a 2.2-mile connector line from the Zachary Substation to Ameren Missouri's Adair Substation. The summary will not include a summary of comments submitted to the docket sheet via filings and will not address comments made through testimony at the local public hearings.

Q. How many public comments were submitted to EFIS?

A. As of October 20, 2015, there are approximately 3,000 public comments in EFIS. It should be noted that the EFIS field "Total Public Comment(s)" indicates there are 1,266 comments; however, there are petitions with approximately 1,700 signatures that were entered as batches of approximately 25-50 signatures per batch so the additional 1,700 signatures are not reflected individually in the "Total" field of EFIS.

Q. Can you provide an estimate of the number of comments that support the request versus the number of comments that are opposed to the request?

A. Yes, I can provide an estimate. EFIS does not have an easy way to sort the comments by "support" or "against"; however, I have reviewed all the comments submitted in the case file. Based on that review, I would estimate there are less than 10 comments providing support for the request, and over 2,900 opposed to the request. Without providing any commentary on the positions put forth in the comments, the reasons presented for the positions will be summarized later in my testimony.

Q. You state there are approximately 3,000 comments in EFIS. Are any of the comments submitted in EFIS duplicate comments?

A. Yes. It is difficult to specifically quantify the number of duplicate comments in the case, especially since some are contained in batch entries; however, as previously stated, I have reviewed all the comments so I can provide some general information regarding

duplicate entries. All duplicate comments are comments opposing the request. Some of the comments were submitted to the Office of the Public Counsel ("OPC"), the Commission's Data Center or the Commission's Consumer Services Unit. Therefore, some comments are entered into EFIS a couple of times depending on how they were received. Some commenters submitted one comment, which was signed by multiple family members. For instance, Joe Smith and Mary Smith signed the same comment. This comment is entered into EFIS under "Joe Smith" and also under "Mary Smith". This may be considered by some as a duplicate comment.

Q. You state "petitions" are entered as public comments. Can you describe the petitions?

A. Yes. The petitions are signed by multiple individuals. Petition language is similar to the following:

> Petition to Stop the Mark Twain Transmission Project
>
> Petition Summary: We are opposed to the building of this 345,000 volt transmission line through Northeast Missouri.
>
> Action Petitioned For: We the undersigned are concerned citizens who urge our leaders to act now to stop the Mark Twain Transmission Project.

Q. Are there other types of comments submitted in EFIS?

A. Yes. In addition to the petitions, there are comments that appear to be "form" letters. More specifically, there are several comments that state:

> Dear Commissioners:
>
> Re: Case #EA-2015-0146
>
> I am strongly opposed to Ameren Transmission Company of Illinois' proposed Mark Twain Transmission Project, and ask that they be denied public utility status and the project not be approved. The state of Missouri does not need the energy, or benefit from the project.

> The proposed Mark Twain Transmission Project would violate our property rights, and could reduce real estate values up to 50%. The poles would significantly impede farming, make it impossible to graze with portable electric fences, and destroy many century farms. High voltage power lines increase the risk of childhood leukemia, miscarriage, and draining batteries in pacemakers. They create a dangerous fire hazard if poles go down in a storm or tornado. The Mark Twain Transmission Project would cause countless acres of deforestation, restrict future land use options, and tarnish rural landscapes.
>
> Thank you for your consideration.
>
> Sincerely,
>
> Signature
> Printed Name
> Address

Another type of form letter states:

> Dear Commissioners:
>
> I am writing in regard to case number EA-2015-0146.
>
> I am opposed to the proposed Ameren Transmission Company of Illinois' (ATXI) Mark Twain Transmission Project and ask that you DENY public utility status and a Certificate of Convenience and Necessity.
>
> ATXI is not a public utility – it is not providing electricity to end customers "for the greater good"—it is a for-profit retailer of electricity to other electric companies, none in Missouri.
>
> The proposed project would reduce our property value far more than ATXI could ever compensate with a one-time, lump sum purchase of easement. It would spoil our rural landscape, cause hundreds of acres of deforestation (which will cause more atmospheric issues), create obstacles to farming, limit future land use options, increase potential health risks to humans, livestock and native wild animals.
>
> The Mark Twain Transmission Project is not needed. Missouri has reduced energy consumption because of higher efficiency in usage and little/no new industry, and our population is not increasing. There will be no long-term jobs or revenue for our state and no electric usage from the transmission lines going through our state.

Please consider that the disadvantages of this project far out-weigh the benefits and deny ATXI a Certificate of Convenience and Necessity.

Thank you!

Sincerely,

Signature
Printed Name
Address

Q. Are there any comments in EFIS that are not "form" letters or petitions?

A. Yes. There are also "non-form-letter" comments in support of and in opposition to the request. Comments in opposition were submitted by county commissioners and individuals, citing reasons such as: violations of individual landowner property rights related to utility status/eminent domain issues; unknown health concerns; no clear direct benefit to Missouri; the long-term impact to the beauty and landscape of Missouri; the effect on crops or livestock; the effect on the Amish community in the area; and, the effect on global positioning systems ("GPS"), pacemakers, cell phones, farming processes or technologies in the area. Several comments in opposition state the proposed line will affect the Possibility Alliance and Superhero Headquarters ("Possibility Alliance"). Possibility Alliance is characterized as a service organization that relies on the land and an electricity-free environment for its work. It is also the center of the Haul of Justice Bike Riders, a service group that, according to the comments, has provided, over the past 15 years, over 45,000 hours of community service all over the country.

Comments in support of the request include: increased tax revenue for the county, schools and road districts and the creation of jobs.

Q. Did Staff investigate the various issues, whether positive or negative, raised in the comments?

A. Yes. Other Staff witnesses address many of the issues raised in comments and suggest conditions, where appropriate, to alleviate those concerns.

Q. Does this complete your rebuttal testimony?

A. Yes it does.

Natelle Dietrich
Case Summary

Presented testimony or analysis through affidavits on the following cases and proceedings:

- Case No. TA-99-405, an analysis of the appropriateness of a "payday loan" company providing prepaid telecommunications service.
- Case No. TX-2001-73, In the Matter of Proposed New Rules on Prepaid Calling Cards.
- Case No. TO-2001-455, the AT&T/Southwestern Bell Telephone Company arbitration, which included issues associated with unbundled network elements.
- Case No. TX-2001-512, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-33.010, 33.020, 33.030, 33.040, 33.060, 33.070, 33.080, 33.110, and 33.150 (telecommunications billing practices).
- Case No. TO-2002-222, the MCI/SWBT arbitration.
- Case No. TR-2002-251, In the Matter of the Tariffs Filed by Sprint Missouri, Inc. d/b/a Sprint to Reduce the Basic Rates by the Change in the CPI-TS as Required by 392.245(4), Updating its Maximum Allowable Prices for Non-Basic Services and Adjusting Certain Rates as Allowed by 392.245(11) and Reducing Certain Switched Access Rates and Rebalancing to Local Rates as Allowed by 392.245(9).
- Case No. TX-2002-1026, In the Matter of a Proposed Rulemaking to Implement the Missouri Universal Service Fund End-User Surcharge.
- Case No. TX-2003-0379, In the Matter of Proposed Amendments to Commission Rule 4 CSR 240-3.545, formerly 4 CSR 240-30.010 (tariff filing requirements).
- Case No. TX-2003-0380, In the Matter of Proposed Amendments to Commission Rules 4 CSR 240-2.060, 4 CSR 240-3.020, 4 CSR 240-3.510, 4 CSR 240-3.520, and 4 CSR 240-3.525 (competitive local exchange carrier filing requirements and merger-type transactions).
- Case No. TX-2003-0389, In the Matter of Proposed Amendment to Commission Rules 4 CSR 240-3.530 and 4 CSR 240-3.535, and New Rules 4 CSR 240-3.560 and 4 CSR 240-3.565 (telecommunications bankruptcies and cessation of operation).
- Case No. TX-2003-0445, In the Matter of a Proposed New Rule 4 CSR 240-33.160 Regarding Customer Proprietary Network Information.
- Case No. TX-2003-0487, In the Matter of Proposed Commission Rules 4 CSR 240-36.010, 36.020, 36.030, 36.040, 36.050, 36.060, 36.070, and 36.080 (arbitration and mediation rules).
- Case No. TX-2003-0565, In the Matter of a Proposed Rulemaking to Codify Procedures for Telecommunications Carriers to Seek Approval, Amendment and Adoption of Interconnection and Resale Agreements.
- Case Nos. TX-2004-0153 and 0154, in the Matter of Proposed Rule for 211 Service (emergency and permanent rules).

- Case Nos. TO-2004-0370, IO-2004-0467, TO-2004-0505 et al, In the Matter of the Petition of various small LECs for Suspension of the Federal Communications Commission Requirement to Implement Number Portability.
- Case No. TX-2005-0258, In the Matter of a New Proposed Rule 4 CSR 240-33.045 (placement and identification of charges on customer bills).
- Case No. TX-2005-0460, In the Matter of the Proposed Amendments to the Missouri Universal Service Fund Rules.
- Case No. TO-2006-0093, In the Matter of the Request of Southwestern Bell Telephone, L.P. d/b/a SBC Missouri, for Competitive Classification Pursuant to Section 392.245.6, RSMo (2205) – 30-day Petition.
- Case Nos. TC-2005-0357, IR-2006-0374, TM-2006-0306, the complaint case, earnings investigation and transfer of assets case to resolve issues related to Cass County Telephone Company, LP, LEC Long Distance, FairPoint Communications, Inc., FairPoint Communications Missouri Inc. d/b/a FairPoint Communications and ST Long Distance Inc. db/a FairPoint Communications Long Distance.
- Case No. TC-2006-0068, FullTel, Inc., v. CenturyTel of Missouri, LLC.
- Case No. TX-2006-0169, In the Matter of Proposed New Rule 4 CSR 240-3.570 Regarding Eligible Telecommunications Carrier Designations for Receipt of Federal Universal Service Fund Support.
- Case No. TX-2006-0429, In the Matter of a Proposed Amendment to 4 CSR 240-3.545 (one day tariff filings).
- Case No. TX-2007-0086, In the Matter of a Proposed Rulemaking to Create Chapter 37 – Number Pooling and Number Conservation Efforts
- Case No. TA-2009-0327, In the Matter of the Petition of TracFone Wireless, Inc. for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Lifeline and Link Up Service to Qualified Households.
- Case No. RA-2009-0375, In the Matter of the application of Nexus Communications, Inc. dba TSI for Designation as an Eligible Telecommunications Carrier in the State of Missouri for the Limited Purpose of Offering Wireless Lifeline and Link Up Service to Qualifying Households.
- Case No. AX-2010-0061, Office of Public Counsel's Petition for Promulgation of Rules Relating to Billing and Payment Standards for Residential Customers.
- Case No. GT-2009-0056, In the Matter of Laclede Gas Company's Tariff Revision Designed to Clarify its Liability for Damages Occurring on Customer Piping and Equipment Beyond the Company's Meter.
- Case No. ER-2012-0166, In the Matter of Union Electric Company d/b/a Ameren Missouri's Tariffs to Increase Its Revenues for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0174, In the Matter of Kansas City Power & Light Company's Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).

- Case No. ER-2012-0175, In the Matter of KCP&L Greater Missouri Operations Company's Request for Authority to Implement A General Rate Increase for Electric Service. Energy Independence and Security Act of 2007 (EISA).
- Case No. ER-2012-0345, In the Matter of Empire District Electric Company of Joplin, Missouri Tariff's Increasing Rates for Electric Service Provided to Customers in the Missouri Service Area of the Company. Energy Independence and Security Act of 2007 (EISA).
- File Nos. EO-2013-0396 and EO-2013-0431, In the Matter of the Joint Application of Entergy Arkansas, Inc., Mid South TransCo, LLC, Transmission Company Arkansas, LLC and ITC Midsouth LLC for Approval of Transfer of Assets and Certificate of Convenience and Necessity, and Merger and, in connection therewith, Certain Other Related Transactions; and In the Matter of Entergy Arkansas, Inc.'s Notification of Intent to Change Functional Control of Its Missouri Electric Transmission Facilities to the Midwest Independent Transmission System Operator Inc. Regional Transmission System Organization or Alternative Request to Change Functional Control and Motions for Waiver and Expedited Treatment, respectively.
- Case No. MX-2013-0432, In the Matter of a Proposed Rulemaking to Revise Manufactured Housing Rules Regarding Installation and Monthly Reporting Requirements.
- Case No. TX-2013-0324, In the Matter of a Proposed Rulemaking to the Missouri Universal Service Fund.
- Case No. EO-2014-0095, In the Matter of Kansas City Power & Light Company's Filing for Approval of Demand-Side Programs and for Authority to Establish Demand-Side Programs Investment Mechanism.
- Case No. EA-2014-0207, In the Matter of the Application of Grain Belt Express Clean Line LLC for a Certificate of Convenience and Necessity Authorizing It to Construct, Own, Operate, Control, Manage, and Maintain a High Voltage, Direct Current Transmission Line and an Associated Converter Station Providing an Interconnection on the Maywood - Montgomery 345 kV Transmission Line.

- Actively participated in or prepared comments on numerous issues on behalf of the Commission to be filed at the Federal Communications Commission.
- Prepared congressional testimony on behalf of the Commission on number conservation efforts in Missouri.
- A principal author on Missouri Public Service Commission Comments on the Reduction of Carbon Emissions in Missouri under Section 111(d) of the Clean Air Act.
- A principal author on Missouri Public Service Commission Comments on the Environmental Protection Agency's "Emission Guidelines for Existing Stationary Sources: Electric Generating Unity".

Commission Arbitration Advisory Lead Staff for the following cases:

- Case No. TO-2005-0336, Southwestern Bell Telephone, L.P., d/b/a SBC Missouri`s Petition for Compulsory Arbitration of Unresolved Issues For a Successor Interconnection Agreement to the Missouri 271 Agreement ("M2A").
- Case No. IO-2005-0468, In the Matter of the Petition of Alma Telephone Company for Arbitration of Unresolved Issues Pertaining to a Section 251(b)(5) Agreement with T-Mobile USA, Inc.
- Case No. TO-2006-0147 et al, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with T-Mobile USA, Inc and Cingular Wireless.
- Case No. TO-2006-0299, Petition of Socket Telecom, LLC for Compulsory Arbitration of Interconnection Agreements with CenturyTel of Missouri, LLC and Spectra Communications, LLC, pursuant to Section 251(b)(1) of the Telecommunications Act of 1996.
- Case No. TO-2006-0463, In the Matter of the Petition for Arbitration of Unresolved Issues in a Section 251(b)(5) Agreement with ALLTEL Wireless and Western Wireless.
- Case No. TO-2009-0037, In the Matter of the Petition of Charter Fiberlink-Missouri, LLC for Arbitration of an Interconnection Agreement Between CenturyTel of Missouri, LLC and Charter Fiberlink-Missouri, LLC.