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Issue(s):	Planning Considerations
Witness:	Dennis D. Kramer
Sponsoring Party:	Ameren Transmission Company of Illinois
Type of Exhibit:	Direct Testimony
Case No.:	EA-2017-0345
Date Testimony Prepared:	September 15, 2017

MISSOURI PUBLIC SERVICE COMMISSION

CASE NO. EA-2017-0345

DIRECT TESTIMONY

OF

DENNIS D. KRAMER

ON

BEHALF OF

AMEREN TRANSMISSION COMPANY OF ILLINOIS

St. Louis, Missouri
September, 2017

NP

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DIRECT TESTIMONY

OF

DENNIS D. KRAMER

CASE NO. EA-2017-0345

I. INTRODUCTION AND WITNESS QUALIFICATIONS

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

A. My name is Dennis D. Kramer. I am currently the Senior Director of Transmission Policy, Stakeholder Relations and Business Development at Ameren Services Company (Ameren Services). Ameren Services provides various support services to Ameren Corporation and its operating subsidiaries, including Ameren Transmission Company of Illinois (ATXI). These services include engineering, construction management, planning, finance, accounting, and legal services.

Q. Please summarize your educational background and professional experience.

A. I graduated from Purdue University in 1978 with a Bachelor of Science degree in Electrical Technology with concentrations in power systems and digital electronics. I graduated from Tulane University in 1990 with a Master of Business Administration degree with concentrations in strategic planning and marketing.

I have over 40 years of experience in the electric energy industry. In 1974, I was employed by Public Service Indiana as a regional area operator in the Power Supply organization, with responsibility for directing power transmission and distribution activities. In 1978, I moved into an engineering position where I was responsible for

performing system load flow studies to assess the impact of system design modifications on transmission capacity margins and system operations procedures. I also supported the Supervisory Control and Data Acquisition (SCADA) Systems in the regional control center. In 1979, I transferred to the Power Generation organization as an engineer at Gibson fossil power plant, where I was responsible for supporting the instrumentation and control systems and computer monitoring systems necessary for the safe and efficient operation of the plant. In 1980, I transferred to the Marble Hill Plant, a 2,200 Megawatt (MW) electric nuclear project, where I led the plant control instrumentation and control engineering and plant computer engineering activities during construction and system testing.

In 1984, I accepted a management position with Entergy Corporation at the Waterford III 1,100 MW electric nuclear power plant. I managed engineers, programmers and technicians performing the installation, testing and operational support of plant control and monitoring systems. In 1988, I accepted the position of Manager, Marketing Services in the retail and wholesale marketing organization of Entergy Corporation. I managed analysts and researchers in creating and implementing customer research plans and the development of preferred product/service portfolios.

In 1994, I accepted the position of Director, Technical Services with Unimar Consulting Group Ltd. I directed engineers, analysts and researchers in conducting research and developing portfolios of regulated and non-regulated products and services for client companies including the majority of the top 100 electric utilities in North America. In 1997, I accepted the position of Experienced Manager with the National Energy Consulting Practice of Arthur Andersen. I managed numerous projects dedicated

to assisting clients in meeting electric deregulation requirements (with an emphasis in Texas and California).

In 2002, I accepted the position of Senior Manager in the Energy Practice of Bearingpoint Corporation. I performed numerous projects with energy clients in North America to improve business processes, increase profitability and reduce operating costs in the areas of power generation, transmission and distribution.

In 2005, I accepted the position of Transmission Policy Specialist with Ameren Services. I assisted in transmission policy development and communication with Regional Transmission Organization (RTO) stakeholders and the Midwest Independent Transmission System Operator, Inc. (MISO)[1]. In 2007, I was promoted to the position of Supervisor, Transmission Policy, and in 2009, I was promoted to the position of Manager of Transmission Policy and Planning.

In September 2014, I was promoted to Senior Director and was given the additional responsibility for overall stakeholder communications and community and public relations relating to the public processes for the routing of transmission assets. In December 2016, I moved into my current position.

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

A. I am responsible for the development of transmission policy for the transmission-owning companies served by Ameren Services, its communication to stakeholders, and its eventual implementation through MISO and applicable regulatory agencies. I also have responsibility for the overall stakeholder communications,

[1] In 2013 MISO changed its name to Midcontinent Independent System Operator, Inc.

community outreach, public relations, and public process for the routing and locating of transmission assets.

II. PURPOSE AND SCOPE

Q. Are you familiar with the Mark Twain Transmission Project?

A. Yes. ATXI is proposing to construct what it calls the Mark Twain Transmission Project (Mark Twain or the Project) in northeast Missouri. The Project consists of a 345-kV electric transmission line that is largely co-located with an existing Northeast Missouri Electric Power Cooperative (Northeast Power) transmission line[2] that generally runs from near Palmyra[3] in a westerly direction to near Kirksville. Near Kirksville, the Project will connect to a new ATXI substation to be known as the Zachary Substation, which will be interconnected to the existing Ameren Missouri 161 kV Adair Substation, which is located immediately adjacent to the Zachary Substation site. Exiting Zachary, the Project will then co-locate with an existing Union Electric Company d/b/a Ameren Missouri (Ameren Missouri) transmission line that runs generally northward to a connection point on the Missouri-Iowa border. At that point, the Project will connect with the portion of the MISO Multi-Value Project (MVP) being constructed by MidAmerican in Iowa[4]. The direct testimony of ATXI witness James (Jim) Jontry provides more detailed information about the Project routing.

[2] The Northeast Power line is known as the Adair-South River 161-kV line.
[3] Near Palmyra the Project will co-locate with an existing Ameren Missouri transmission line to connect to the Maywood switching station. This switching station is a part of ATXI's Illinois Rivers Project for which this Commission granted a Certificate of Public Convenience and Necessity in File No. EA-2015-0145. The Missouri portion of the Illinois Rivers Project was completed in October, 2016.
[4] Discussed in further detail below.

In general, the Project is a portion of a larger portfolio of regional transmission upgrades approved by MISO's Board of Directors pursuant to the provisions of its Energy Markets and Operating Reserves Tariff (the Tariff), which has been approved by the Federal Energy Regulatory Commission (FERC).

Q. Is this the same project about which you testified in File No. EA-2015-0146?

A. Yes, with the only exception being that the specific route has been adjusted so that it is almost entirely co-located with the Northeast Power and Ameren Missouri lines mentioned above. From an electrical perspective, the project is the same.

Q. What is the purpose of your testimony?

A. The purpose of my testimony is to explain why the Project is necessary and beneficial to the regional transmission system and why it benefits Missouri when it is fully integrated in the grid.

Q. Are you sponsoring any schedules in support of your direct testimony?

A. Yes. I am sponsoring the following schedules:

- **Schedule DDK-01**, a map depicting MISO's footprint
- **Schedule DDK-02**, a simplified electrical diagram of the existing northeast Missouri 161-kV transmission supply system
- **Schedule DDK-03 (Confidential)**, summary results of an analysis of the Northern Missouri electrical grid for certain NERC Category P events

Q. Will you be referring to any other documents?

A. Yes. I will refer to several documents that are publicly available on the MISO website (https://www.misoenergy.org):

- The MISO Transmission Expansion Plan 2011, referred to as "MTEP11";
- The MISO Multi Value Project Portfolio Results and Analysis report, referred to as the "MVP Report";
- The MISO MTEP14 MVP Triennial Review, referred to as "MVP Triennial Review";
- The MISO MTEP15 MVP Review, referred to as the "2015 MVP Review"; and,
- The MISO MTEP16 MVP Review, referred to as the "2016 MVP Review".

Q. Please generally summarize why the Project is necessary and beneficial for the regional transmission system.

A. The Project is an integral part of a portfolio of Multi-Value Projects (MVPs or the MVP Portfolio) that was approved by the MISO Board of Directors in December 2011 as necessary to facilitate the delivery of renewable energy, resolve numerous reliability issues, reduce transmission line losses, and provide economic and efficiency benefits to customers within the MISO footprint.

Q. Please generally summarize why the Project is beneficial to Missouri.

A. When the Project is fully implemented, it will provide additional transmission capacity to facilitate the delivery of renewable energy resources to Missouri, market efficiency benefits as described in ATXI witness Dr. Todd Schatzki's direct

testimony, and improved reliability and voltage support to the transmission system in northern Missouri, as I discuss below.

III. BACKGROUND OF MVP PROJECTS

Q. You have testified that this Project is part of a portfolio of MVPs approved by MISO in 2011. What is MISO?

A. MISO is an independent, not-for-profit, and FERC-approved RTO responsible for regional transmission planning, reliability assurance, and management of competitive electricity markets across all or parts of 15 states, including Missouri, and the Canadian province of Manitoba.[5] MISO's regional area of operations ("footprint") stretches from the Ohio-Indiana line in the east to eastern Montana in the west, and south to New Orleans. **Schedule DDK-01** is a map depicting MISO's current footprint. MISO serves as an essential link in the safe, cost-effective delivery of electric power across the central one-third of the country.

As an RTO, MISO is responsible for operational oversight and functional control of the Bulk Electric System (BES), the operation of transparent energy markets, and regional and interregional transmission planning activities. MISO is responsible for approving transmission service, new generation interconnections, and new transmission interconnections to and within the MISO footprint, and for ensuring that the system is planned to reliably and efficiently provide for existing and forecasted usage of the transmission system.

Q. Please describe the MISO Transmission Expansion Planning (MTEP) process.

[5] In December 2011, MISO consisted of 12 states and the Canadian province of Manitoba.

A. The first step in the process occurs when Ameren Services, on behalf of the MISO Transmission Owners it supports[6] (and the other MISO Transmission Owners), performs its annual analysis and planning required to maintain the reliability of transmission systems for which Ameren Services provides support. Ameren Services provides information to MISO, including plans for upgrades and additions to the transmission system. MISO reviews the transmission plans from all MISO Transmission Owners and applies their own analysis to identify synergies between plans and potentially new solutions for identified system problems. MISO reviews and consolidates the individual transmission plans of the MISO Transmission Owners and identifies potential areas where additional benefit can be achieved through coordination of transmission improvements.

Additionally, MISO performs targeted system studies, which seek to address regional concerns and issues. The result of the MTEP process is a collection of projects which are needed to address both regional and local system needs and provide desired benefits.

Q. You testified earlier that the Project is an MVP. What are MVPs?

A. An MVP is a unique type of transmission project developed by MISO, with stakeholder input, and approved by FERC. An MVP is a project that is evaluated through the MISO MTEP process and determined as being a necessary component of a portfolio of projects whose benefits are spread across the MISO footprint and that meet certain criteria in the MISO Tariff.

Q. What are those criteria?

[6]Ameren Services provides support and transmission planning for the transmission systems of Ameren Missouri, Ameren Illinois Company d/b/a Ameren Illinois, and ATXI.

A. In order for a project to be classified as an MVP, it must meet at least one of the following criteria (which appear in MISO's Tariff):

"**Criterion 1**

A Multi Value Project must be developed through the transmission expansion planning process for the purpose of enabling the Transmission System to reliably and economically deliver energy in support of documented energy policy mandates or laws that have been enacted or adopted through state or federal legislation or regulatory requirement that directly or indirectly govern the minimum or maximum amount of energy that can be generated by specific types of generation. The MVP must be shown to enable the transmission system to deliver such energy in a manner that is more reliable and/or more economic than it otherwise would be without the transmission upgrade.

Criterion 2

A Multi Value Project must provide multiple types of economic value across multiple pricing zones with a Total MVP Benefit-to-Cost ratio of 1.0 or higher where the Total MVP Benefit-to-Cost ratio is described in Section II.C.7 of this Attachment FF. The reduction of production costs and the associated reduction of LMPs resulting from a transmission congestion relief project are not additive and are considered a single type of economic value.

Criterion 3

A Multi Value Project must address at least one Transmission Issue associated with a projected violation of a NERC or Regional Entity standard and at least one economic-based Transmission Issue that provides economic value across multiple pricing zones. The project must generate total financially quantifiable benefits, including quantifiable reliability benefits, in excess of the total project costs based on the definition of financial benefits and Project Costs provided in Section II.C.7 of Attachment FF."

Q. Please explain how the MVP Portfolio was developed.

A. In 2008, MISO began the study process by undertaking a Regional Generation Outlet Study (RGOS) to investigate how best to fulfill various Renewable Portfolio Standards (RPS) requirements reliably and efficiently by accessing wind resources located across the MISO footprint. The RGOS study was the first step in the three-year detailed analysis of the transmission system that eventually led to the determination that the transmission lines identified as part of the MVP Portfolio are necessary to enable RPS mandates to be met at the lowest total delivered wholesale energy cost. In addition, the MVP Portfolio was designed to enhance and complement the performance of the existing grid to produce a more robust and efficient transmission system. Ameren Services participated in the MISO RGOS and MVP studies over the 2008-2011 timeframe, assessing optimum transmission development to integrate the renewable energy resources necessary to meet the states' renewable energy portfolio standards and maximize the benefits that would ultimately be provided to Ameren Missouri retail customers.

During the study process, MISO and the stakeholders developed a robust business case for the MVPs, which demonstrated that not only will the MVP Portfolio reliably enable RPS requirements to be met, but it will do so in a manner where its economic benefits exceed its costs. While the study focused upon the states' RPS requirements, the MVP Portfolio has widespread benefits beyond the delivery of wind and other renewable energy. It will enhance system reliability and efficiency under a variety of different generation build outs. It will also open markets to competition, reducing congestion and spreading the benefits of low cost generation across the MISO footprint. The projects in the 2011 MVP Portfolio were evaluated against MVP Criteria 1 and their ability to reliably enable the renewable energy mandates of the MISO states.

MISO considered multiple future scenarios in the analysis to ensure that the Project's expected benefits will be provided under a range of varying conditions. When implemented, the MVP Portfolio is intended to achieve public policy goals, increase market competition, deliver lower cost generation by reducing transmission system congestion, and enhance the reliability of the regional transmission system under a variety of possible future generation resource mixes.

As a result of this MTEP process, MISO's independent Board of Directors approved in December 2011 several new transmission projects, including the portfolio of 17 MVPs. The MVP Portfolio is a key component of MTEP11. These 17 projects, taken together, are intended to provide long-term, regional solutions for meeting state renewable energy policies, improving the efficiency of wholesale energy markets and addressing known reliability issues. Finally, the long-term nature of the transmission needs intended to be met by the MVP Portfolio was an important factor in the planning

process and, as approved, ensures that the most efficient transmission portfolio is placed in service.

Q. How is the Mark Twain Project related to the projects making up the MVP Portfolio that was approved in MTEP11?

A. The Mark Twain Project is the name given by ATXI to all or portions of two MVPs – Numbers 7 and 8 – that are being built by ATXI in Missouri. Specifically, MVP 8 is the portion of the Project running from the Maywood Switching Station to the new Zachary Substation. MVP 7 is the proposed line running from Zachary to Ottumwa, Iowa, the Missouri portion of which is bundled together with MVP 8 as the Mark Twain Transmission Project.

Q. What is the anticipated in-service date for the Project?

A. The Project's in-service date is anticipated to be late 2019.

IV. BENEFITS OF THE MVP PORTFOLIO AND THE PROJECT

Q. What are the benefits of the Project?

A. As an element of the MVP Portfolio, and as discussed by Dr. Schatzki in his direct testimony, the Project will support a reduction in the wholesale cost of energy delivery for consumers by enabling the delivery of low-cost generation to the load and reducing congestion costs. It will also increase reliability in northeast Missouri, including in the Kirksville area.

Q. What was the justification for including the Project as a part of the 2011 MVP Portfolio?

A. The Project was included in the MVP Portfolio based upon the following benefits:

- The Project's 345-kV lines from Ottumwa, Iowa to the Zachary Substation (referred to in MTEP 11 as the Adair Substation) to Maywood (referred to in MTEP 11 as the Palmyra Tap) and the 161-kV connection between the Zachary Substation to Ameren Missouri's existing Adair Substation will provide an outlet for wind generation in the western region of MISO (which includes Missouri) to be delivered to or in Missouri, as well as provide a path for renewable energy to more densely populated load centers.
- In addition to providing a wind outlet, the new lines will provide reliability benefits by addressing transmission issues in Northeast Missouri, including low voltage concerns that could have arisen under certain system conditions.

Q. How does the increased access to wind generation enabled by the Project assist states in meeting their renewable energy portfolio standards?

A. As the MVP Report indicates, "The projects in the proposed Multi Value Project portfolio were evaluated against Criterion 1, which requires the projects to reliably or economically enable energy policy mandates." MVP Report at 48. This was particularly important because 11 of the 12 states in the MISO footprint at that time had enacted RPS requirements or renewable energy goals that require or recommend that various amounts of load be served with energy from renewable energy resources. Figure 3.1 of the MVP Report, set out below, depicts these standards:

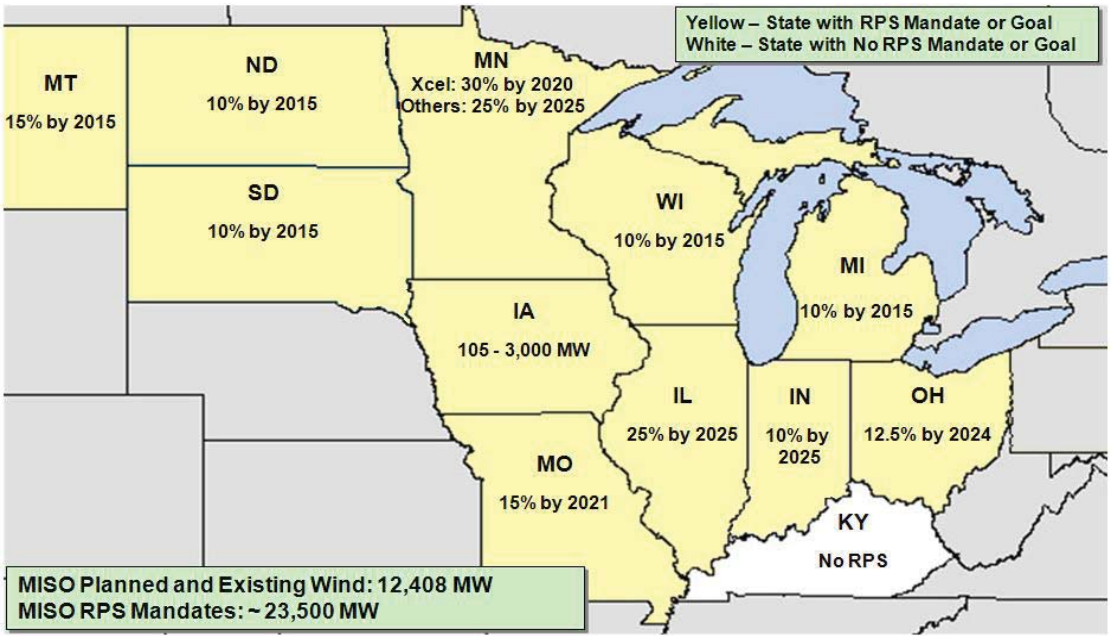

Figure 3.1 RPS Mandates and goals within the MISO footprint

In its planning analysis, MISO anticipated that the wind resources throughout the MISO footprint would need to be relied upon to meet the RPS mandates.

One of the goals of the RGOS analysis was to design transmission portfolios that would enable RPS mandates to be met at the lowest delivered wholesale energy cost. To accomplish this, the RGOS analysis, with considerable stakeholder input, identified energy zones based upon considerations such as wind capacity and existing infrastructure (such as transmission and natural gas pipelines). The output of MISO's MVP study determined that the MVP Portfolio would enable the delivery of approximately 41 million MWh to help satisfy MISO state renewable portfolio mandates through 2026. These energy sources are assumed to be spread across the MISO footprint.

MISO has a tariff requirement to conduct a full review of the MVP Portfolio benefits on a triennial basis. Therefore, in 2014, MISO conducted its three-year review of the 2011 MVP Portfolio. MISO's analysis (the MTEP14 MVP Triennial Review) re-

demonstrated the Portfolio's ability to assist MISO states in meeting the state renewable portfolio mandates. In fact, even though the RPS assumptions had not changed, MISO's review demonstrated that the completed MVP Portfolio would enable even more renewable energy – a total of 43 million MWh of renewable energy to MISO states through 2028. In sum, the triennial review verified one of the important benefits of the MVP Portfolio, which is that it provides these renewable energy sources to the MISO states, including Missouri, to allow them to meet the RPS mandates.

Q. You earlier mentioned that part of the MVP criteria, in addition to meeting RPS mandates, was to develop a portfolio that was intended to support public policy goals. With specific reference to Missouri, are there public policy goals aside from Missouri's RPS that are supported by the Mark Twain Project?

A. While not imposing a legal requirement on load serving entities in Missouri, the delivery of renewable generation that the Mark Twain line (and the MVP portfolio in general) enables and supports one of the recommendations in the *Missouri Comprehensive State Energy Plan* issued by the Missouri Department of Economic Development's Division of Energy. Specifically, the *State Energy Plan* recommended that Missouri's RPS should be strengthened to require that 20 percent of annual retail electricity sales be met through eligible renewable energy technologies by 2025. The *State Energy Plan* also discussed the benefits of diversifying the state's energy portfolio, which could occur from increased RPS standards or which could occur simply as the result of increased access to competitive renewable energy as compared to more traditional sources of generation, whether driven by relative cost or the demands of customers.

Q. How were the reliability concerns that will be addressed by the Project identified?

A. During the MVP planning process, Ameren Services identified known reliability concerns that could potentially be addressed by the Project when it is fully implemented and interconnected with the Ameren Missouri system, as well as connected to the 345-kV transmission systems in Iowa and Illinois.[7] In working with the MISO to develop the Project, Ameren Services sought to design the Project to address known reliability concerns where feasible. Ameren Services utilized its knowledge of load and generation locations, as well as the transmission system topology, in attempting to maximize the reliability benefits provided by the Project.

Q. What are the reliability benefits for the MVPs comprising the Mark Twain Project?

**[redacted]

[7] The reliability benefits of the Project flow from the implementation of the entire Project, not from any single component.
[8] NERC issued a revised Transmission Planning Standard in 2013, and now NERC Category P contingencies cover the same (and additional) transmission issues that were classified as Category C contingencies in the previous version of the Standard.

[redacted]**

Q. Can you provide more details about the reliability issues in northeast Missouri?

A. **[redacted]**

[redacted]**

Q. Are there limits on how low the system voltage can go without causing problems?

A. Yes. As I stated previously, the reliability issues in northeast Missouri are primarily caused by low voltage conditions. Ameren Services applies the Ameren Transmission Planning Criteria and Guidelines (the Criteria and Guidelines) when analyzing the grid. The Criteria and Guidelines are developed in compliance with FERC

715, Part 4 TPRC[9] requirements, are updated each year, submitted to FERC and publically available on the MISO website.

The Criteria and Guidelines, Revised 3/15/2017, Section 2.7.3 System Study Assumptions, paragraph 1, page 26, states the following: "In the course of study work, should post-contingency transmission voltages in a general area drop to 90% of nominal or below, closer examination is warranted to determine whether voltage collapse for such contingency conditions is likely. Distribution bus voltages less than or equal to 90% would indicate possible motor stalling (considering voltage drop of 5-7% on distribution feeders). Transmission voltages of 85% is the level at which a voltage collapse is essentially assured. Situations which show transmission voltages in the range of 86%-89% in a steady state analysis carry significant risk for voltage collapse."

Q. ** [redacted]

[redacted]

[redacted]

[redacted]

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[9] Transmission Planning Reliability Criteria.

NP

[redacted]**

Q. Does Ameren Services apply this revised Standard when studying all low-voltage events?

A. Yes. The revised Standard and analysis method is used when studying low-voltage events.

Q. Does the Project fully address the low voltage issues that cause this load to be at risk of loss?

A. **[redacted]**

Q. Does the fact that the Project is going to be primarily co-located with Northeast Power's 161-kV line from Palmyra to Zachary and the Ameren Missouri 161-kV line from Adair to the Iowa border impact the reliability benefits the Project will provide?

A. No, the reliability benefits of the Project are not impacted by the new physical routing. The Project's electrical configuration and connections remain

unchanged and are the same as originally designed. Therefore, the Project will provide the same reliability benefits as originally planned.

Q. Has MISO analyzed the benefits provided by the MVP Portfolio compared to the Portfolio costs?

A. Yes. MISO analyzed the benefits and costs of the MVP Portfolio when it was approved by the MISO Board of Directors in 2011. It should be noted that per FERC Order ER10-1791-000, the MVPs were analyzed as a portfolio and not as individual separate projects.

The analysis of the MVP Portfolio approved in MTEP11 revealed that the MVP Portfolio resulted in total system-wide benefits ranging from 1.8 to 3.0 times its total cost in 2011 dollars. When these system-wide benefits were evaluated for their distribution within the MISO footprint, benefits to Missouri ranged from 1.8 to 3.2 times the costs.

Q. When MISO conducted the MVP Triennial Review, what was the benefit-cost ratio of the MVP Portfolio as a whole, and what was the benefit-cost ratio for Missouri?

A. When compared to the present value of the revenue requirements for the MVP Portfolio, the MVP Triennial Review found that the Portfolio produces total system wide benefits of between 2.6 to 3.9 times the costs on a present value basis, an increase from the benefit cost ratio of 1.8 to 3.0 determined in the original Portfolio justification. When these system-wide benefits were evaluated for their distribution within the MISO footprint, benefits to Missouri had increased from its 2011 analysis, amounting to between 2.3 and 3.3 times the costs.

Q. Has MISO performed additional analysis of the MVPs since the Triennial Review?

A. Yes. In both 2015 and 2016 MISO performed a limited MVP analysis as part of the MTEP process.

Q. What were the results these analyses?

A. MISO's 2015 MVP Review showed that projected MISO North[10] and Central region benefits provided by the MVP Portfolio are comparable to the MTEP11 analysis results. In the analysis the Portfolio produces total system wide benefits of between 1.9 and 2.8 times the cost on a present value basis, which is almost identical to the MTEP11 calculated benefits of 1.8 to 3.0. The benefits to Missouri ranged from 1.6 to 2.0. The reduction in calculated benefits is primarily due to lower assumed future natural gas prices, but even at those lower natural gas prices, the ratios of benefits to costs clearly shows that the benefits substantially outweigh the costs.

MISO's 2016 MVP Review shows that projected MISO North and Central region benefits provided by the MVP Portfolio are comparable to the MTEP11 analysis results and the 2015 MVP review. The 2016 MVP Review indicates the portfolio produces total system wide benefits of between 2.0 and 2.7 times the cost on a present value basis. The benefits to Missouri ranged from 1.6 to 2.0, which is identical to the 2015 MVP review.

The periodic reviews indicate that the thorough analysis of the MVP Portfolio that was performed prior to their approval by the MISO Board of Directors has ensured the Portfolio provides significant benefits under a wide range of future scenarios.

[10] MISO North is MISO's footprint as it existed when the MVP portfolio was approved.

V. MVP COSTS

Q. How will the costs of the MVP Portfolio and the Project be recovered?

A. The revenue requirements for the projects that are part of the MVP Portfolio are collected from load-serving entities acquiring energy for their customers from MISO through MISO transmission charges. Since the load of Missouri load-serving entities (Ameren Missouri and other Missouri wholesale load-serving entities) represents less than 8% of the total MISO load that is allocated MVP costs, the Missouri load-serving entities will pay less than 8% of the transmission charges arising from the Mark Twain Project.

Q. Does this conclude your direct testimony?

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 a Certificate of Public Convenience and Necessity Authorizing it to Construct, Install, Own, Operate, Maintain and Otherwise Control and Manage a 345-kV Electric Transmission Line from Palmyra, Missouri, to the Iowa Border and an Associated Substation Near Kirksville, Missouri.	))))))))	File No. EA-2017-0345

AFFIDAVIT OF DENNIS D. KRAMER

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

Dennis D. Kramer, being first duly sworn on his oath, states:

1. My name is Dennis D. Kramer. I work in the City of St. Louis, Missouri, and I am employed by Ameren Services Company as Senior Director of Transmission Policy, Stakeholder Relations and Business Development.

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 22 pages, and Schedule(s) DDK-01, DDK-02, and DDK-03 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.

Dennis D. Kramer

Subscribed and sworn to before me this 13th day of September, 2017.

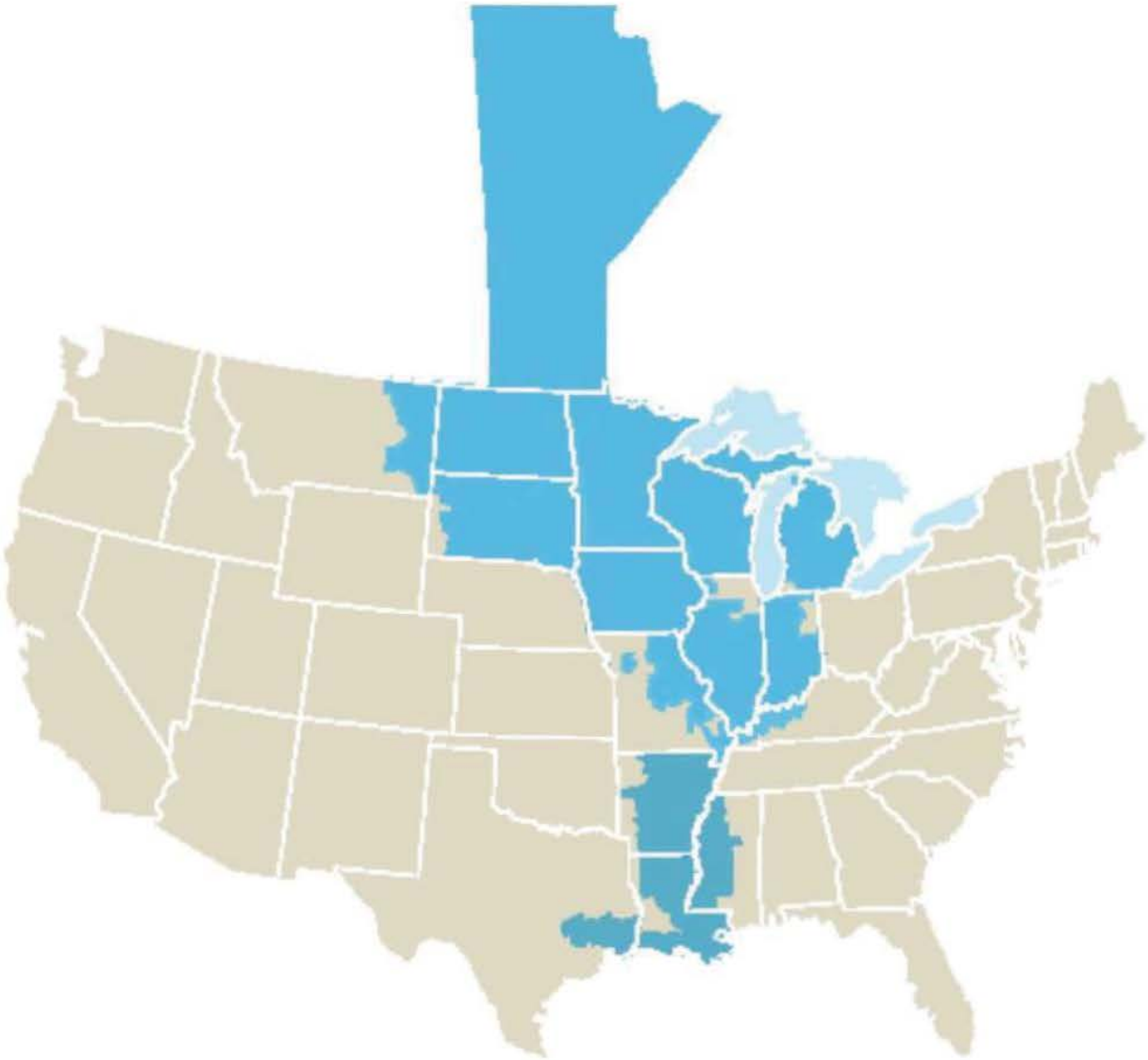
Notary Public

My commission expires: March 7, 2021

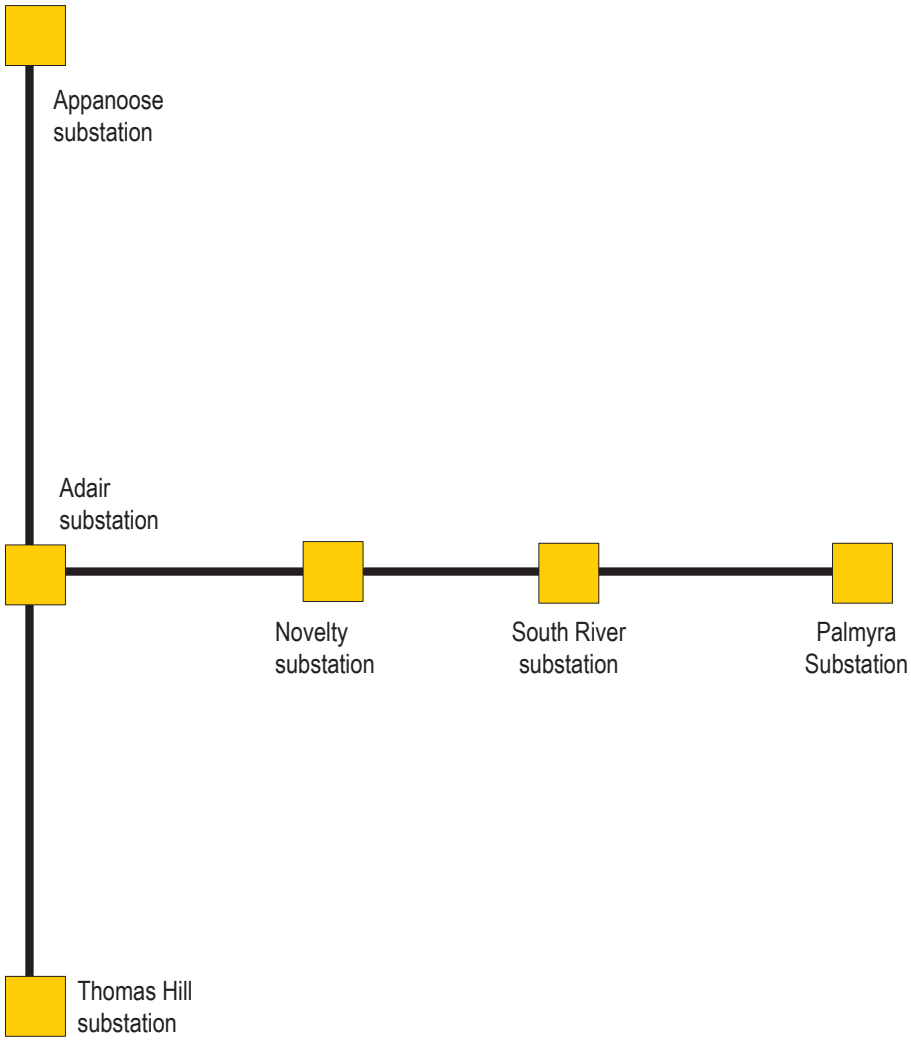
CATHLEEN A DEHNE
Notary Public – Notary Seal
St. Louis City – State of Missouri
Commission Number 17119727
My Commission Expires Mar 7, 2021

Schedule DDK-01

MISO Footprint Map



Northeast Missouri 161 kV supply system diagram



SCHEDULE DDK-02

SCHEDULE DDK-03

IS CONFIDENTIAL

IN ITS ENTIRETY