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Witness	Jessica Timmermann
Sponsoring Party	ATXI
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**MISSOURI PUBLIC SERVICE  
COMMISSION**

**FILE NO.**

**EA-2022-0099**

**DIRECT TESTIMONY**

**OF**

**JESSICA TIMMERMANN**

**ON**

**BEHALF OF**

**AMEREN TRANSMISSION COMPANY  
OF  
ILLINOIS**

St. Louis, Missouri  
December 21, 2021

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**DIRECT TESTIMONY OF**

**JESSICA TIMMERMANN**

**FILE NO. EA-2022-0099**

**Submitted on Behalf of**

**AMEREN TRANSMISSION COMPANY OF ILLINOIS**

1

**I. INTRODUCTION**

2

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

3

A. My name is Jessica Timmermann. I work for Ameren Services Company (Ameren Services) at 1901 Chouteau Avenue, St. Louis, Missouri 63103 as the Supervising Engineer in the Transmission Line Design Department.

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

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A. In December 2008, I received a Bachelor's of Science in Civil Engineering from Southern Illinois University located in Edwardsville, Illinois. After graduation, I started with Ameren Services working in the Civil Engineering group. After working in that group for about 2.5 years, I transitioned into Transmission Line Design. I worked as an Engineer in Transmission Line Design until my recent promotion to Supervisor of the same group in April 2020. I obtained a Professional Engineering License in the State of Illinois in June 2013 and maintain that certification.

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

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A. As Supervising Engineer in the Transmission Line Design Department, I

1 supervise a team of engineers in completing transmission line design on behalf of  
2 Ameren's transmission-owning entities, including Ameren Transmission Company of  
3 Illinois (ATXI).

4 **Q. Have you previously testified before the Commission?**

5 A. Yes, in Case No. EA-2021-0087 (ATXI's Limestone Ridge Project).

6 **II. PURPOSE OF TESTIMONY**

7 **Q. What is the purpose of your direct testimony?**

8 A. I support ATXI's request for a Certificate of Convenience and Necessity  
9 (CCN) and related Commission approvals authorizing ATXI to construct, acquire, and  
10 operate certain transmission assets as part of the "Project" described in the direct  
11 testimony of ATXI witness Sean Black (ATXI Exhibit 1.0). Specifically, I describe the  
12 line-related elements of the Project. These include certain existing line facilities (the  
13 Existing Line), an interest in which, as Mr. Black explains, ATXI and MJMEUC will  
14 acquire from the City of Sikeston (Sikeston), including the Sikeston Board of Municipal  
15 Utilities (SBMU). The Project also includes a new transmission line (the New Line) that  
16 ATXI will construct as part of the Project, as well as certain new or modified line  
17 facilities that ATXI will construct outside the new Comstock substation (the Area  
18 Connections) to connect it to the grid.

1           **Q.     Are you sponsoring any schedules with your direct testimony?**

2           A.     Yes. I am sponsoring the following schedules:

- 3                     •   JT-D1 – Aerial image of the Existing Line;
- 4                     •   JT-D2 – Aerial image depicting the proposed route of the New
- 5                             Line;
- 6                     •   JT-D3 – Example of typical tangent wood structure;
- 7                     •   JT-D4 – Example of typical deadend wood structure;
- 8                     •   JT-D5 – Aerial image depicting the proposed routes of the Area
- 9                             Connections; and
- 10                    •   JT-D6 – Example of typical deadend steel structure.

11   **III.    THE EXISTING LINE**

12           **Q.     Please describe the location of Existing Line, an interest in which ATXI**

13 **and MJMEUC will acquire from Sikeston/SBMU.**

14           A.     The Existing Line is a single-circuit 161 kV transmission line that extends

15 south from Southwestern Power Administration’s (SWPA) existing Sikeston substation

16 and terminates at Associated Electric Cooperative Inc.’s (AECI) existing New Madrid

17 substation. ATXI will acquire an interest in the approximately 28 miles of the Existing

18 Line spanning those two stations. **Schedule JT-D1** is an aerial image of the Existing

19 Line. The Existing Line is also depicted as the solid green line on the diagram embedded

20 in the direct testimony of Mr. Black.

21           **Q.     Please describe the facilities associated with the Existing Line.**

22           A.     The Existing Line operates at 161 kV. It is composed of three phases of

1 795 kcm 26/7 ACSR "Drake" conductor and two phases of 7/16" 7 strand extra high  
2 strength (EHS) shield wire. Structure types for the Existing Line consist of wood H-  
3 frame tangent structures for in line structures and wood H-frame structures with down  
4 wires or "guys" at angled structure locations. The average structure height on the  
5 Existing Line is 70 feet. The width of the right-of-way is generally 100 feet.

6 **Q. Will ATXI actually operate the Existing Line?**

7 A. No. As Mr. Black explains, per the Operation and Maintenance Services  
8 Agreement, SBMU will continue to operate and maintain the Existing Line as it does  
9 today.

10 **Q. Will there be any line work associated with the Existing Line?**

11 A. No. Outside of the work necessary to integrate the Existing Line with the  
12 New Line and one of the Area Connections (see below), ATXI does not intend to  
13 perform any work on the Existing Line.

14 **IV. THE NEW LINE**

15 **Q. Please generally describe the New Line.**

16 A. As Mr. Black explains, ATXI will construct an approximately 1.2-mile  
17 single-circuit 161 kV transmission line extending east from the Existing Line near the  
18 SWPA New Madrid substation to New Madrid. Specifically, the new facilities will  
19 extend from the Existing Line to Municipal Light & Power's (MPL) existing North  
20 Primary Substation, located just outside of New Madrid. The New Line will connect the  
21 Existing Line to New Madrid's electrical system. **Schedule JT-D2** is an aerial image

1 depicting the proposed route of the New Line, which generally parallels other existing  
2 lines owned by New Madrid. The New Line is also depicted as the dashed purple line  
3 on the diagram embedded in the direct testimony of Mr. Black.

4 **Q. Please describe the proposed route of the New Line.**

5 A. As **Schedule JT-D2** depicts, the New Line will begin on the Existing  
6 Line's alignment, between structures 169 and 171. It will then run approximately 1.2  
7 miles northeast to MPL's existing North Primary Substation.

8 **Q. Does the route cross any existing electric, gas, or telephone conduit,**  
9 **wires, cables, or lines of any regulated or nonregulated utilities, railroad tracks, or**  
10 **underground facilities?**

11 A. Yes. The route crosses above existing overhead and underground electric  
12 lines, and an underground gas line. It also has one crossing over Union Pacific railroad.  
13 A list of all electric, gas, and telephone conduit, wires, cables, and lines of regulated and  
14 nonregulated utilities, railroad tracks, and each underground facility that the proposed  
15 construction will cross is provided as Appendix C to ATXI's Application in this  
16 proceeding.

17 **Q. What is the proposed right-of-way width for the New Line?**

18 A. The proposed right-of-way width for the New Line is 100 feet.

19 **Q. Why is a right-of way of that width needed?**

20 A. Based on the proposed line design, a 100 foot right-of-way is needed to  
21 provide adequate clearance from the 161 kV transmission line conductors to the edge of

1 the right-of-way for operational and maintenance purposes.

2 **Q. Has ATXI acquired any real estate rights along the proposed corridor**  
3 **of the New Line?**

4 A. Yes. To construct the New Line, ATXI ultimately needs property rights  
5 from four different landowners, who own a total of seven distinct parcels. ATXI has  
6 voluntarily obtained, from each of these landowners, an option which, once exercised,  
7 will result in ATXI having the necessary rights to construct and own the New Line.

8 **Q. What are the technical specifications of the New Line?**

9 A. Again, the proposed New Line will be a 161 kV single circuit overhead  
10 transmission line, approximately 1.2 miles long. The New Line will run from the  
11 Existing Line, between structures 169 and 171, to MPL's existing North Primary  
12 Substation. ATXI will construct the proposed line using single wood pole structures with  
13 crushed rock backfill. Where the transmission line angle is greater than 15°, a single  
14 wood pole with guy wires and above ground anchors will be used. Pole heights will  
15 range from 75 feet to 115 feet. The New Line will be constructed with three phases of  
16 2-477 kcmil 30/7 "Hen" ACSR/T2 and a single 3/8" 7-strand EHS shield wire. The New  
17 Line will be designed for a minimum 22 foot clearance to grade at the maximum  
18 operating temperature, which meets or exceeds the National Electrical Safety Code  
19 (NESC).

20 **Q. Approximately how many new structures will the New Line require?**



1           A.     The New Line will require approximately eighteen (18) new structures.

2           **Q.     What are the specifications for those new structures?**

3           A.     As indicated above, most of the new structures will be single wood pole  
4 structures. **Schedule JT-D3** is an example of a typical tangent wood structure that will  
5 be used along the New Line.

6           **Q.     Does any aspect of the new line-work vary from the standard line  
7 design structures you described above?**

8           A.     Yes, there will be a few deadend structures at locations with line angles  
9 greater than 15°. Like the tangent structures, these structures will be single wood poles  
10 with crushed rock backfill. They will be different, however, in that they will be  
11 supported by guy wires and below-ground anchors. **Schedule JT-04** is an example of a  
12 typical deadend wood structure.

13          **Q.     How, specifically, will the New Line connect to the Existing line?**

14          A.     Via what is referred to as a "Hard Tap" configuration. The new tap  
15 structure will be a 3-pole wood-guyed structure placed in line with the alignment of the  
16 Existing Line. Existing conductor and shield wire will be transferred and dead-ended  
17 onto the new tap structure. An additional circuit will be installed from the new tap  
18 structure to MPL's North Primary Substation. This additional circuit will electrically  
19 connect to the Existing Line via jumpers.

20          **Q.     Is that a reliable configuration for the anticipated amount of load that  
21 will initially be associated with the Project?**

1           A.     Yes. Especially given that the load currently associated with the Project  
2 could be served via alternate means in the event of an interruption in transmission  
3 service. While a Hard Tap configuration might not be ideal for higher loads that cannot  
4 be served from secondary sources, the configuration is adequate here given the  
5 anticipated load level and the availability of secondary resources. If this load increases  
6 materially – for example as a result of future development generally referenced by Mr.  
7 Black – ATXI may need to revisit this configuration. But for now, this configuration  
8 represents a reliable and cost effective solution.

9                                   **V.     THE AREA CONNECTIONS**

10           **Q.     Please describe the need for the Area Connections.**

11           A.     As a part of the Project, it will be necessary for ATXI to "tie together" the  
12 Comstock substation with the other electrical assets in the area. I refer, collectively, to  
13 these line connections as the Area Connections.

14           **Q.     Please describe in further detail the Area Connections facilities.**

15           A.     The Area Connections consist of six (6) lines connecting the new  
16 Comstock substation with other adjacent assets. **Schedule JT-D5** is an aerial image  
17 depicting the proposed routes of the Area Connections. The Area Connections are also  
18 depicted as the dashed orange lines on the diagram embedded in the direct testimony of  
19 Mr. Black.

20                   Some of these lines will be new and some will be modifications of or to existing  
21 lines. These lines range from 0.1 miles to 0.4 miles in length. A further description of

1 these connections is as follows:

2 a. One line will connect the Existing Line 1 to the new Comstock substation. This  
3 segment of line, which will be approximately 0.4 miles, is new construction,  
4 though it can also be thought of as an extension or modification of the Existing  
5 Line. Please see the westernmost, dashed orange line labeled "Area Connection  
6 (a)" on the diagram embedded in Mr. Black's testimony.

7 b. Two lines (really circuits) will connect the new Comstock substation with other  
8 existing assets owned by SBMU. These circuits are currently connected to the  
9 SWPA substation and will essentially be modified to terminate at the Comstock  
10 substation as a part of the Project. Please see the two dashed orange lines labeled  
11 "Area Connections (b): To Sikeston Xfmr/Gen" on the diagram embedded in  
12 Mr. Black's testimony.

13 c. One new line will connect the new Comstock substation directly with the  
14 SWPA Sikeston substation. Please see the easternmost, dashed orange line  
15 labeled "Area Connection (c)" on the diagram embedded in Mr. Black's  
16 testimony.

17 d. Ameren Missouri currently has a transmission line – the Miner line – that  
18 terminates at the SWPA Sikeston substation. As a part of the Project, this line  
19 will be modified (split in the area of the Comstock substation) and the two ends  
20 will also be re-terminated at the new station. Please see the two blue/dashed

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<sup>1</sup> In the commercial documents, item (a) is more closely associated with the Existing Line (as opposed to the Area Connections) as, once complete, it will be subject to the same ownership structure as the remainder of the Existing Line.

1 orange lines labeled "Area Connections (d)" on the diagram embedded in Mr.  
2 Black's testimony.

3 ATXI may also help facilitate the connection, to the Comstock substation, of a  
4 SBMU-owned distribution line. That connection has been omitted from the diagram  
5 embedded in Mr. Black's testimony and from the costs presented in the direct testimony  
6 of ATXI witness Stephanie Thomson (ATXI Exhibit 2.0), as it is uncertain at this time  
7 whether the connection will be required. Should it be required, ATXI and SBMU will  
8 coordinate regarding the connection of that line, which will ultimately be paid for by  
9 SBMU.<sup>2</sup>

10 **Q. Do the Area Connections cross any existing electric, gas, or telephone**  
11 **conduit, wires, cables, or lines of any regulated or nonregulated utilities, railroad**  
12 **tracks, or underground facilities?**

13 A. Yes. The Area Connections cross above existing overhead and  
14 underground electric lines, an underground sewer line, a drainage ditch, an underground  
15 communication line, and an underground water line. They also cross Southwestern  
16 Power Administration's existing 161 kV overhead transmission line. Again, a list of all  
17 electric, gas, and telephone conduit, wires, cables, and lines of regulated and  
18 nonregulated utilities, railroad tracks, and each underground facility that the proposed  
19 construction will cross is provided as Appendix B to ATXI's Application in this  
20 proceeding.

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<sup>2</sup> That line, along with the lines/circuits referenced by items (b) and (c) above, are referred to in the commercial documents as the "Sikeston Owned Area Connections."

1           **Q.     Will any right-of-way be needed for the Area Connections?**

2           A.     Yes, right-of-way will be needed for the Area Connections.

3           **Q.     What is the proposed right-of-way width?**

4           A.     The proposed right-of-way width for all lines is 100 feet.

5           **Q.     Why is a right-of way of that width needed?**

6           A.     Based on the proposed line design, a 100 foot right-of-way is needed to  
7 provide adequate clearance from the 161 kV transmission line conductors to the edge of  
8 the right-of-way for operational and maintenance purposes.

9           **Q.     Does ATXI believe it will be able to obtain, voluntarily, the real estate  
10 interests it needs to construct the Area Connections?**

11          A.     Yes. Most of the Area Connections will be located on property owned by  
12 Sikeston or SWPA. ATXI is in discussions with Sikeston about obtaining an easement  
13 necessary to facilitate the Project and with SWPA about obtaining a license<sup>3</sup> for the  
14 same. The only portion of any Area Connection that will be located on land owned by  
15 any other third party is the southern portion of the new Area Connection (the connection  
16 represented by sub (a) above) that will connect the new Comstock substation with the  
17 Existing Line. A portion of this line (see the east-west portion in the figure embedded in  
18 Mr. Black's testimony) affects a private landowner. Sikeston has already obtained the  
19 necessary easement from this landowner and will assign rights to ATXI and MJMEUC  
20 as required.

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<sup>3</sup> SWPA prefers a license as opposed to an easement.

1           **Q.     What are the technical specifications of the Area Connections?**

2           A.     The Area Connections will be 161 kV, overhead transmission lines  
3 ranging from 0.1 to 0.4 miles in length. The two proposed circuits from the new  
4 Comstock substation to SBMU's Startup and Generator at the SBMU Power Station (the  
5 circuits referenced in item (b) above) will be built as a double circuit line. All other Area  
6 Connection lines will be single circuit. The majority of the Area Connections will be  
7 built with wood structures, both tangent and deadends, with crushed rock backfill. There  
8 will be three steel deadend structures on drilled pier concrete foundations installed for  
9 the Area Connections. These steel structures will be self-supported and will not require  
10 any down wires or "guys." The Area Connections will be constructed with three phases  
11 of 1192 kcm 54/19 ACSS "Grackle" conductor and a single lightning shield wire, which  
12 provides communication and system protection. The Area Connections will be designed  
13 for a minimum 22 foot clearance to grade at the maximum operating temperature, which  
14 meets or exceeds the NESC. **Schedule JT-D3** is an example of a typical wood tangent  
15 structure that will be installed along the Area Connections and **Schedule JT-D4** is an  
16 example of a deadend wood tangent structure that will be installed along the Area  
17 Connections. There will also be three steel deadend structures on drilled pier concrete  
18 foundations. **Schedule JT-D6** is an example of these types of steel structures.

19           **Q.     Approximately how many new structures will the Area Connections**  
20 **require?**

21           A.     The Area Connection will require approximately twelve (12) new  
22 structures.

1

## **VI. LINE WORK COSTS**

2

**Q. Are all known costs associated with the transmission line work reflected  
3 in the Project costs contained in Ms. Thomson's direct testimony?**

4

**A. Yes.** The numbers contained in Ms. Thomson's direct testimony reflect  
5 the currently estimated cost of all transmission line work – both from a total and an  
6 AMMO Pricing Zone allocated cost perspective.

7

## **VII. CONCLUSION**

8

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

9

**A. Yes.**

**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 ) File No. EA-2022-0099  
Necessity under Section 393.170, )  
RSMo. relating to Transmission Investments )  
in Southeast Missouri. )

**AFFIDAVIT OF JESSICA TIMMERMANN**

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

Jessica Timmermann, being first duly sworn on her oath, states:

My name is Jessica Timmermann and on my oath declare that I am of sound mind and lawful age; that I have prepared the foregoing *Direct Testimony*; and further, under the penalty of perjury, that the same is true and correct to the best of my knowledge and belief.

*Jessica Timmermann*  
\_\_\_\_\_  
Jessica Timmermann

Dated: December 17, 2021