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Issue(s): Re-submittal of CPA to MDNR
Witness: Craig J. Giesmann
Sponsoring Party: Union Electric Company
Type of Exhibit: Supplemental Testimony
Case No.: EA-2012-0281
Date Testimony Prepared: January 24, 2014

MISSOURI PUBLIC SERVICE COMMISSION

Case No. EA-2012-0281

SUPPLEMENTAL TESTIMONY

OF

CRAIG J. GIESMANN

ON

BEHALF OF

**UNION ELECTRIC COMPANY
d/b/a AMEREN MISSOURI**

**St. Louis, Missouri
January 2014**

Ameren Exhibit No. 04
Date 3-31-2014 Reporter Stewart
File No. EA-2012-0281

1 SUPPLEMENTAL TESTIMONY

2 OF

3 CRAIG J. GIESMANN

4 CASE NO. EA-2012-0281

5 I. INTRODUCTION

6 Q. Please state your name and business address.

7 A. Craig J. Giesmann, Union Electric Company Power Operation Services, 3700
8 South Lindbergh, Sunset Hills, Missouri 63127.

9 Q. What is your position with Union Electric Company d/b/a Ameren Missouri
10 (Ameren Missouri or Company)?

11 A. I am the Managing Supervisor of Hydro Engineering.

12 Q. Are you the same Craig J. Giesmann who previously filed surrebuttal and
13 sur-surrebuttal testimonies in this case?

14 A. Yes.

15 Q. What is the purpose of your supplemental testimony in this proceeding?

16 A. The purpose of my supplemental testimony is to provide the Commission with
17 information regarding the Company's withdrawal of its February 2013 Construction Permit
18 Application (CPA) application and its resubmittal to the Missouri Department of Natural
19 Resources (MDNR) on December 11, 2013. The original CPA was included in my surrebuttal
20 testimony as Schedule CJG-S23.

21 Q. Are you sponsoring any schedules?

22 A. Yes, I am sponsoring Schedule CJG-ST1, which is the revised CPA that was
23 submitted to MDNR on December 11, 2013. The revised CPA was also provided to all of the

1 parties to this case on December 18, 2013. I am also sponsoring Schedule CJG-ST2, which I
2 discuss below.

3 **Q. Why did the Company withdraw its CPA in October 2013?**

4 A. During its review of the originally-submitted CPA, MDNR found that the
5 Company planned to install an additional seven groundwater monitoring wells above and beyond
6 the number of wells that had been required by the agency. However, because engineering details
7 for these additional seven wells and their respective locations were not included in the CPA then
8 under review, MDNR suggested to the Company that the most expeditious way to include these
9 details would be to withdraw its original CPA, include the well details and locations in a revised
10 CPA, and then re-submit the revised CPA.

11 **Q. If MDNR was not requiring the additional wells, why was it necessary to**
12 **revise the CPA?**

13 A. Because adding the wells results in a change in one of the design features of the
14 UWL. MDNR must review and approve the total design, even if that design goes beyond its
15 requirements.

16 **Q. Why did this lead to a withdrawal of the original CPA and a re-submittal of**
17 **a revised CPA?**

18 A. MDNR's historical practice has been to conclude its CPA reviews within one year
19 of the original submission date (which was February 7, 2013). Because of the time needed to
20 work with the County on the specific details and locations of the additional wells and then
21 incorporate that information into a revised CPA, MDNR indicated to the Company that it would
22 be impractical for them to complete their review by February 7, 2014, as they had originally

1 contemplated consistent with their historical practice. Consequently, MDNR suggested that the
2 original CPA be withdrawn and that a revised CPA be re-submitted.

3 **Q. Why were the details of these wells not included within the original CPA?**

4 A. These additional wells were required by Franklin County as part of Franklin
5 County's Utility Waste Landfill (UWL) ordinance. The Franklin County ordinance delegates
6 engineering review to an Independent Registered Professional Engineer (IRPE). The IRPE
7 retained by the County for this phase of the project is Andrews Engineering, headquartered in
8 Springfield, Illinois. The County's ordinance requires review of the pertinent engineering
9 documents by the IRPE. This review was on-going and concurrent with MDNR's review of the
10 CPA. As a result of the IRPE's review and recommendation, the County requested that an
11 additional seven groundwater monitoring wells be installed. While the Company does not
12 believe the additional wells are necessary to protect human health and the environment – and
13 MDNR is not requiring them – the Company agreed to install them in order to allow the
14 permitting processes – both at the County and at MDNR – to proceed in the most efficient and
15 timely manner possible.

16 **Q. Has MDNR approved the installation of the additional seven wells?**

17 A. Yes. By letter dated January 13, 2014, MDNR approved the installation of the
18 additional seven wells and indicated that they would become part of the overall groundwater
19 monitoring network. A copy of MDNR's letter approving the installation is attached hereto as
20 Schedule CJG-ST2.

21 **Q. Were any other changes made to the CPA other than the addition of the new**
22 **wells?**

1 A. Yes. The Company took the opportunity to make minor corrections and
2 clarifications to the CPA as had been suggested by the IRPE and MDNR. These were not
3 substantive in nature and involved mostly corrections of typographical errors and clarifications,
4 such as the inclusion in the CPA itself of the calculations that supported the liquefaction analyses
5 contained in the original CPA. A sheet was included with the new CPA submittal that identifies
6 each change.

7 **Q. Has Franklin County now approved the engineering design contained in the**
8 **CPA?**

9 A. Yes. Franklin County and its IRPE have stated that the revised CPA is in
10 compliance with all County requirements. Letters demonstrating their approvals are included
11 within the revised CPA submitted to MDNR.

12 **Q. Have any of the opinions you have previously given in your testimony**
13 **changed as a result of this new CPA submission?**

14 A. No. The revisions to the CPA do not impact any of the information or opinions in
15 my other pre-filed testimonies, except to extent that the capital cost of cell number 1 is expected
16 to increase immaterially by approximately \$150,000 because of the costs to design and install the
17 additional wells. This sum is so small as compared to the approximately \$84 million total cost of
18 all 4 cells (\$27 million for cell 1) that it has inconsequential impact on any of the numbers or
19 analyses in my testimonies.

20 **Q. Can you please elaborate on the MDNR review process from here forward?**

21 A. Yes. MDNR has indicated that its review will be limited to (a) the changes made
22 to the CPA, and (b) verifying that the identified changes were in fact the only changes that were

1 made. MDNR has indicated that it expects to complete its review by May 2014. We therefore
2 expect MDNR to issue a Construction Permit by approximately June 1, 2014.

3 **Q. Does this conclude your supplemental testimony?**

4 **A. Yes, it does.**

**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 Public)
Convenience and Necessity Authorizing)
it to Construct, Install, Own,) File No. EA-2012-0281
Operate, Maintain, and Otherwise Control and Manage)
A Utility Waste Landfill and Related Facilities at its)
Labadie Energy Center.)

AFFIDAVIT OF CRAIG J. GIESMANN

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

Craig J. Giesmann, being first duly sworn on his oath, states:

1. My name is Craig J. Giesmann. I work in the City of St. Louis, Missouri, and I am employed by Union Electric Company d/b/a Ameren Missouri as Managing Supervisor of Hydro Engineering.
2. Attached hereto and made a part hereof for all purposes is my Supplemental Testimony on behalf of Union Electric Company d/b/a Ameren Missouri consisting of 5 pages and Schedules CJG-ST1 and CJG-ST2, 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.



Craig J. Giesmann

Subscribed and sworn to before me this 24th day of January 2014.

My commission expires: 4/19/17





Notary Public