

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

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IDAHO PUBLIC
UTILITIES COMMISSION

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IDAHO POWER COMPANY.)

COMPLAINANT.)

VS.)

THE CITY OF EAGLE, IDAHO.)

RESPONDENT. }

CASE NO. IPC-E-04-04

REBUTTAL AND SUPPLEMENTAL TESTIMONY OF

PIKE TEINERT

ON BEHALF OF

THE CITY OF EAGLE, IDAHO

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Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Pike Teinert and my business address is 834 Harcourt Road Boise, Idaho 83702.

Q. ARE YOU THE SAME PIKE TEINERT WHO FILED DIRECT TESTIMONY AND EXHIBITS IN THIS MATTER?

A. I am.

Q. WHAT IS THE SCOPE OF YOUR REBUTTAL AND SUPPLEMENTAL TESTIMONY?

A. I will address the proposed overhead transmission line from Eagle Substation to the new Star Substation along the route just North of and adjacent to State Street through the City of Eagle to the new Star Substation.

Q. HAVE YOU REVIEWED THE DIRECT TESTIMONY OF THE COMMISSION STAFF, IN THIS MATTER?

A. Yes.

Q. DO YOU HAVE ANY OVERALL OBSERVATIONS REGARDING THAT TESTIMONY?

A. Yes. Staff addressed many issues in its testimony, but it does not recommend an acceptable solution that can both satisfy the City's objections and meet the Company's goal of serving the new Star Substation.

1 **Q. WHAT WOULD BE AN ACCEPTABLE SOLUTION FOR BOTH PARTIES**
2 **IN THIS CASE?**

3 A. The Company has stated that it wants to provide service
4 to the new Star Substation from the existing Eagle Substation and
5 the City's position is to minimize the impact of sub-transmission
6 service to the new Star Substation on its residential and
7 commercial property owners at no cost to the City or its
8 citizens. If both the City and Company's positions could be
9 realized with the same sub-transmission line and route, an
10 acceptable solution could be reached.

11
12 **Q. BEGINNING WITH THE PURPOSE AND ROUTE OF THE PROPOSED**
13 **LINE DOESN'T THE STAFF IN SEVERAL PLACES IN ITS TESTIMONY STATE**
14 **THAT THE PURPOSE OF THE PROPOSED LINE IS TO SERVE THE NEW STAR**
15 **SUBSTATION?**

16 A. Yes. On page 2, line 7-11, the Staff states that:

17
18 "Simply stated, Idaho Power Company needs to extend its
19 sub transmission facilities from the existing substation through
20 the City of Eagle to the new Star Substation."

21
22 Additionally, on page 4, line 2-6, the Staff states:
23

1 "The Locust-Eagle 138 will be built when the reliability
2 of service is at risk or when the Gary tap is opened because of
3 the State 138kV conversion. The Star tap is a tap in the Locust-
4 Eagle line for temporary service to Star. The Locust No. 2 is
5 completed with the Locust-Eagle 138kV construction and will serve
6 H.P., Joplin, Eagle loads and loads north of the Beacon Light
7 area. The Eagle-Ustick 138kV line serves as a tie to the
8 Cloverdale source. A source in the north Star area will serve the
9 Star Substation."

10 Clearly the need to serve the Star Substation is only
11 temporary. "The Star tap is a tap in the Locust-Eagle line for
12 temporary service to Star." "A source in the north Star area will
13 serve the Star Substation." The Company did not disclose that the
14 proposed Eagle Substation service to the new Star Substation was
15 only temporary.

16 Also and more importantly, the Company did not disclose
17 the real reason for the high capacity 138kV line as stated in the
18 third sentence of the quote. "The Locust Loop No. 2 is completed
19 with the Locust-Eagle 138kV construction and will serve H.P.,
20 Joplin, Eagle loads and loads north of the Beacon Light area."
21 Clearly this high capacity 138kV line, which is the same line
22 being contested in this case, must have the capacity to carry the
23 load for the Joplin and Hewlett-Packard Substations as well as
24 the Eagle Substation load and benefits customers served from the
25 Joplin and Hewlett-Packard substations too.

1 The Company did not disclose this information in its CUP
2 application to the City, in meetings with the City Staff or
3 Council, or in its complaint in this case. And the City of Eagle
4 has been unfairly compelled to use its limited time and financial
5 resources to respond to Idaho Power's claim in this dispute
6 although customers served by the Joplin and Hewlett-Packard
7 Substation clearly benefit from the high capacity 138kV line.

8 Pages 47 and 48 of Exhibit 114 confirm that in the
9 Company's loop model, the first line sections from the source
10 substation, such as the Locust-Eagle 138kV line, must have enough
11 capacity to carry all of the substations on the loop. Therefore,
12 the Locust-Eagle 138kV line must have the capacity to carry all
13 of the load on the Eagle, Joplin and Hewlett-Packard Substations
14 at the same time.

15 Additionally, the Company's request for a high capacity
16 138kV line from the Eagle Substation to the new Star Substation
17 is not the Star Substation's permanent source, but instead, the
18 first phase of the Locust-Eagle 138kV line to complete the Locust
19 Loop No. 2.

20 If the City and the Commission Staff had known that the new
21 Star Substation feed from Eagle Substation was only temporary and
22 that the real reason for the high capacity 138kV line was to
23 complete the Locust Loop No. 2, the search for acceptable
24 solutions would have been much more focused, easier to analyze,
25 less contentious and significantly less time consuming.

1
2 **WHY WOULD THE CITY AND THE STAFF HAVE BEEN ABLE TO PURSUE**
3 **MORE ACCEPTABLE SOLUTIONS?**

4 A. The City and Staff both believed that the Company's
5 request for a high capacity 138kV line was needed to serve the
6 existing and future loads in the Star and Eagle area as stated by
7 the Company in its Testimony. The real reason for the high
8 capacity 138kV line is to serve Eagle, Joplin and H.P.
9 Substations, is to complete the Locust Loop No. 2, a much larger
10 load than the capacity of the new Star Substation. Based on the
11 Company's 10 Year Transmission Plan, City Exhibit No. 114, page
12 No. 48, first paragraph, the first line section, the Eagle-Locust
13 138kV line, in the 138kV Locust Loop No. 2, is rated as a getaway
14 section at 277 MVA. In contrast, the new Star Substation
15 transformer is rated from 20-30 MVA, about one tenth of the
16 capacity the Company plans for the high capacity Eagle-Locust
17 138kV line.

18 Therefore, although the City and Staff have been led to
19 believe that the proposed high capacity 138kV line was needed to
20 serve the Star Substation, the Company's 10 Year Transmission
21 Plan contradicts the Company's testimony and explains that it's
22 real purpose is the completion of the Locust Loop No. 2.
23 Therefore, the City and Commission Staff have been developing
24 alternatives without the benefit of valid data and information.

1 The City and Commission Staff could have more thoroughly
2 analyzed smaller capacity solutions, like 69kV transmission to
3 serve the new Star Substation capacity, had the Company disclosed
4 the size of the Star Substation load, and that the Eagle feed to
5 new Star Substation was only temporary.

6 The Company's failure to disclose the real reason for the
7 high capacity 138kV line created an extremely complex and
8 contentious environment in which a solution to this dispute has
9 not been found after more than four years since the Company first
10 approached the City in late 1999 with its request to serve the
11 proposed Star Substation.

12
13 **Q. HAS THE STAFF INDICATED IN ITS TESTIMONY THAT THEY**
14 **MADE AN ANALYSIS OF THE 69KV OPTION YOU RECOMMENDED IN YOUR**
15 **TESTIMONY?**

16 A. No. The Staff however, did state in its testimony on
17 page 8, line 20, in reference to the 69kV option using ACSS
18 conductor, that they believed it had potential to provide
19 additional transmission capacity at reasonable cost.

20 The Staff further says, beginning on line 23 of page 8,
21 that they would look to the Company to explain why ACSS would not
22 be a viable alternative to expand the capacity of existing
23 facilities.

24 **Q. HAS THE COMPANY PRODUCED ANY DOCUMENTS DETAILING ITS**
25 **ANALYSIS AND DECISION NOT TO USE ACSS?**

1 A. No, it has not.

2
3 **Q. SINCE THE COMMISSION STAFF HAS NOT OFFERED A 69KV**
4 **ALTERNATIVE TO SERVING THE NEW STAR SUBSTATION AND A 69KV**
5 **SOLUTION WOULD REQUIRE CAPACITY THAT IS MUCH LESS THAT THE**
6 **CAPACITY NEEDED FOR THE LOCUST LOOP NO. 2, IS THERE A 69KV**
7 **SOLUTION THAT WILL MEET THE CITY'S REQUIREMENTS AND PROVIDE**
8 **CAPACITY TO SERVE THE NEW STAR SUBSTATION?**

9 A. Yes, the new Star Substation transformer capacity is
10 about 20-30 MVA. A 69kV line using ACSR, all aluminum or ACSS
11 conductor can provide the needed transmission capacity to serve
12 the transformer load at the new Star Substation. In addition to
13 the 69kV transmission line, an autotransformer would be required
14 at or near the Eagle substation. These step-down 138kV/69kV
15 autotransformers are available on the after-market, are excellent
16 equipment for temporary applications and can be ordered and
17 delivered in time to meet the Company's proposed May 2005
18 completion date.

19
20 **Q. ON PAGE 2, BEGINNING AT LINE 24 THE STAFF LISTS**
21 **ALTERNATIVES AVAILABLE TO THE COMMISSION IN ITS DECISION. DOES**
22 **THIS 69KV LINE ALIGN WITH THE ALTERNATIVES?**

23 Yes, the 69kV line aligns with the recommended Commission
24 alternatives Nos. 1, 4) and 5) respectively, directs the Company
25 to extend its overhead facilities through Eagle and directs the

1 Company to pursue a lower cost overhead alignment or a
2 combination of these alternatives.

3
4 **Q. THE STAFF'S DIRECT TESTIMONY FURTHER RECOMMENDS,**
5 **BEGINNING ON PAGE 3, LINE 1, THAT THE COMMISSION SHOULD DIRECT**
6 **THE COMPANY TO INSTALL OVERHEAD FACILITIES. WOULD THE 69KV LINE**
7 **ALIGN WITH THIS RECOMMENDATION BY THE STAFF?**

8 A. Yes, the 69kV overhead line would comply with this
9 recommendation also.

10
11 **Q. ON PAGE 5, BEGINNING ON LINE 19 THE STAFF SAYS THAT "IT**
12 **IS UNLIKELY THAT A PREVIOUSLY PROPOSED OVERHEAD ALIGNMENT**
13 **ADJACENT TO STATE STREET THROUGH THE CITY WOULD BE ANY MORE**
14 **ACCEPTABLE." DO YOU AGREE THAT THIS ALIGNMENT IS UNACCEPTABLE TO**
15 **THE CITY?**

16 A. No, because the Staff was referring to the high
17 capacity 138kV line previously proposed to the City and not the
18 69kV line that could provide the temporary feed to the new Star
19 Substation and would be much less obtrusive. A 69kV line from the
20 Eagle Substation, along the alignment referenced by the staff,
21 west along State Street, has previously used this route on
22 existing poles before the Company reconfigured the line as a
23 distribution feeder from the Eagle Substation. The City would not
24 object to the re-conversion of the line to 69kV service to feed
25 the new Star Substation.

1
2 **Q. ON PAGE 9, BEGINNING ON LINE 13, THE STAFF SAYS THAT**
3 **THE STATE STREET ALIGNMENT MAKES THE MOST ECONOMICAL SENSE FOR**
4 **THE GENERAL BODY OF IDAHO POWER CUSTOMERS. DO YOU AGREE?**

5 A. Yes, I believe that if the Company completes a detailed
6 design and cost analysis of the 69kV alternative, it will
7 illustrate that the 69kV alternative will cost less than the
8 138kV high capacity alternative to temporarily serve the new Star
9 Substation. This solution will therefore have less impact on the
10 general body of Idaho Power customers, as well as the City of
11 Eagle.

12
13 **Q. ARE THERE ADDITIONAL ISSUES RAISED BY THE STAFF IN ITS**
14 **DIRECT TESTIMONY THAT ARE PROBLEMATIC FOR THE CITY?**

15 A. Yes the Staff says on page 3, beginning on line 5 and
16 again on page 9, beginning on line 4 that the Company should be
17 allowed to reasonably extend and upgrade its overhead
18 transmission/distribution facilities as it deems appropriate.
19 However, the Staff does not include in this part of its testimony
20 any recommendation for tests or checks and balances that will
21 ensure that the Company's planning and design for such facilities
22 include both the customer's and the Company's best interests.
23 Especially in contested extension of facilities, as in this case,
24 such a system of checks and balances would have quickly
25 identified the Company's real reason for the proposed high

1 capacity 138kV line. A mandatory system of planning and design
2 tests and checks and balances would have identified the separate
3 functions of the Company's proposed line, one, a high capacity
4 138kV line designed to complete the Locust loop No. 2 and two, to
5 provide temporary service to the new Star Substation. The City
6 and the Company could have focused their discussions clearly on
7 the temporary service of a low capacity sub-transmission line to
8 serve the Star Substation.

9 In this case, an excessive amount of time has been
10 required to extract the details of the Company's plan for the
11 high capacity 138kV line. Therefore, if the Commission
12 establishes a policy that allows the Company to reasonably extend
13 its overhead facilities, then the Commission at the same time
14 must also establish a system of tests, checks and balances for
15 the Commission Staff to analyze the Company's plans and designs
16 for those extensions in disputed instances.

17 As examples, in this dispute, the City and the Staff were
18 not given essential design data including, but not limited to:
19 the proposed sub-transmission line electrical loads, the
20 temporary load requirements for the new Star Substation feed from
21 Eagle, the electrical load requirements of the 138kV high
22 capacity line to complete the Locust Loop No. 2, the timing
23 associated with the completion of the Locust Loop No. 2, the
24 routing of the proposed Locust Loop No. 2 through the city of
25 Eagle, and the Company's standard design specifications for 138kV

1 and 69kV sub-transmission lines. Although the Staff may not be
2 comfortable with analyzing data at this level of detail, it is
3 essential information necessary to analyze plans and design for
4 contested Company projects.

5 If the Commission required and the Staff reviewed this
6 type of essential information as part of its test for
7 reasonableness, the City, the Company and the Commission Staff
8 would have been able to quickly identify potential solutions in
9 this dispute.

10
11 **Q. IN CONCLUSION, WILL YOU PLEASE SUMMARIZE YOUR REBUTTAL**
12 **AND SUPPLEMENTAL TESTIMONY?**

13 A. Yes, in summary the Staff has been unable to provide an
14 acceptable solution for this dispute primarily because the
15 Company did not disclose the real reason for the proposed high
16 capacity 138kV line.

17 An overhead 69kV line solution routed on the old 69kV line
18 right-of-way going West from the Eagle Substation is acceptable
19 to the City as temporary service to the new Star Substation and
20 agrees with the alternatives the Staff recommends to the
21 Commission in its testimony.

22 Also, the Staff's recommendation to the Commission that it
23 should allow the Company to reasonably extend its overhead
24 delivery facilities must be accompanied by a requirement for
25 detailed planning and design data to enable the Staff to ensure

1 equitable solutions for all parties. Had the Company disclosed
2 its real reason for the high capacity 138kV line and provided
3 this detail in the initial request to the City, all parties could
4 have agreed on a solution very early in the process.

5

6 **Q. DOES THIS CONCLUDE YOUR TESTIMONY.**

7 A. Yes.

8

9

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