STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Illinois Commerce Commission
On Its Own Motion

In the Matter of Moratorium on
Disconnection of Utility Services during
the Public Health Emergency Declared
on March 9, 2020 pursuant to Sections
4 and 7 of the Illinois Emergency
Management Agency Act.

Docket No. 20-0309

Stipulation

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois), Northern Illinois Gas Company d/b/a Nicor Gas Company (Nicor Gas), North Shore Gas Company (North Shore), and The Peoples Gas Light and Coke Company (Peoples Gas) (collectively, the Gas Utilities, and each individually, a Gas Utility or Utility); Ameren Illinois and Commonwealth Edison Company (ComEd) (collectively, the Electric Formula Rate Utilities, and each individually, an Electric Formula Rate Utility or Utility) (collectively, the Stipulation Utilities, and each individually, a Stipulation Utility); the Office of the Illinois Attorney General on behalf of the People of the State of Illinois (AG), the City of Chicago (as to the commitments of the City, Peoples Gas, and ComEd), Community Organizing and Family Issues (COFI), the Citizens Utility Board (CUB), Legal Aid Society of Metropolitan Family Services, and Allen Cherry (collectively, the Joint Consumer Parties, or JCP); and the Staff of the Illinois Commerce Commission (Staff) (collectively, the Stipulation Parties or Parties) enter into this Stipulation to comprehensively resolve the issues in this proceeding as among the Stipulation Parties. Specifically, and without waiving any rights except as indicated in this Stipulation, the Stipulation Parties agree to the following terms.

General Terms and Definitions

1. The Stipulation Parties enter into this Stipulation in recognition of the continuing pandemic and the imminent expiration of the Winter Moratorium on March 31, 2021. That is, the Stipulation Parties voluntarily enter into this Stipulation and will implement all provisions of this Stipulation, as specified, as a means to provide specific customer protections and to help residential customers mitigate and reduce outstanding gas and electric arrearages before the Winter Moratorium expires on March 31, 2021 and in the period immediately following said expiration.

2. This Stipulation, when fully executed and accepted, will constitute a valid settlement agreement enforceable among the Parties.
3. This Stipulation is the result of negotiation at arms’ length between and among the Parties, all of whom have been represented by counsel or had the opportunity to consult with counsel, and memorializes the Parties’ agreements. Thus, the Parties, intending to be legally bound and acknowledging the benefit to be derived from the mutual promises and commitments contained herein, agree to the provisions of this Stipulation.

4. This Stipulation is not, and should not be construed, in whole or in part, as a modification, extension, or nullification of the Stipulation among the Stipulation Parties and the large water utilities, appended as Appendix A to, and approved by, the Commission’s June 18, 2020 Order in Docket 20-0309.

5. Each Utility may file tariffs and/or tariff modifications pursuant to the special permission provision of Section 9-201(a) of the Public Utilities Act, 220 ILCS 5/9-201(a), to implement, on less than forty-five (45) days’ notice, changes necessary to implement this Stipulation.

6. For purposes of this Stipulation:
   a. “BPA” or “BPAP” means Bill Payment Assistance Program.
   d. “DPA” means a deferred payment arrangement.
   f. “June 2020 Stipulation” means the Stipulation among the Parties appended as Appendix A to, and approved by, the Commission’s June 18, 2020 Order in Docket 20-0309.
   g. “LAA” means local administering agency.
k. “Order” means the Commission’s Order in this Proceeding adopting this Stipulation.

1. **Suspension of Residential Disconnections for Nonpayment; Disconnection Notices**

   a. **Residential disconnection notices**

      i. Notices will be linked to the disconnection schedule provided in Paragraph 1.c. In other words, only those residential customers eligible for disconnection pursuant to the Disconnection Schedule provided in Paragraph 1.c. may receive a disconnection notice.

      ii. Notices will include information about available financial assistance, including LIHEAP, PIPP, and other private, state and federal assistance programs, and conform to relevant Part 280 requirements concerning notice content. Pursuant to Part 280 Appendices A and B, the notices will inform customers that they may be eligible for a DPA in order to prevent disconnection.

      iii. Following the Commission Order in this proceeding, the Utilities may start issuing disconnection notices for those customers eligible for disconnection in the April 1 through April 30, 2021 tier (provided below in Paragraph 1.c) starting April 1, 2021. The Utilities may start issuing disconnection notices for those customers eligible for disconnection in the May 1 through May 31, 2021 tier (provided below in Paragraph 1.c) starting April 20, 2021. The Utilities may start issuing disconnection notices for those customers eligible for disconnection in the June, 2021 tier (provided below in subsection (c)) starting on May 20, 2021.

      iv. The Utilities will spread out disconnection notices over the calendar month; a utility’s particular spacing of notices may depend on factors, such as customer bill cycles and available call center resources.

   b. **Residential Disconnections** for nonpayment will be phased as provided in Paragraph 1.c immediately below, based on customer arrearage levels, with those in the highest tiers eligible for disconnection first. Customers who do not make a payment or contact the utility to enter into a DPA after receiving a disconnection notice will be eligible for disconnection in accordance with the disconnection procedures in Part 280.

   c. **Disconnection Schedule**: Each Utility will follow the following disconnection threshold schedule, which will be based on, at a minimum, the average residential customer arrearage for the Utility as of January 31, 2021 (“January Arrearage”).
i. April 1 through April 30, 2021 – only residential customers at 150% or more of January Arrearage during the applicable billing period will be eligible for disconnection.

ii. May 1 through May 31, 2021 – only residential customers at 100% or more of January Arrearage during the applicable billing period will be eligible for disconnection.

iii. Starting June 1, 2021 – any residential customer who is eligible for disconnection notices under Part 280.130.

d. **Communications with DCEO and LAAs:** Within 15 days of a Commission Order adopting this Stipulation, the Utilities commit to inform DCEO and the LAAs within their service territory about the schedules for the disconnection notices and disconnections, as provided in this Stipulation.

2. **Reconnection Assistance**

a. **Reconnection Fees:** The Utilities will waive reconnection fees for low-income customers through June 30, 2021.

b. **Reconnection Assistance:**

   i. On or before July 10, 2021, those customers identified as having household incomes up to and including 300% of the FPL who were disconnected and seeking to reconnect, will be able to reconnect by providing 25% of the outstanding balance.

      1. The 25% payment may be paid with customer funds or customer assistance funds including, but not limited to, federal, state, or local assistance funds and/or Bill Payment Assistance Program funds (if available and in accordance with the utility’s applicable BPA Program terms).

      2. Any outstanding balance will be rolled into the reconnected accounts and a DPA will be established, as provided in Paragraph 3.

      3. Starting July 11, 2021, these terms expire and Part 280 rules concerning reconnections will apply.

   c. Nothing in this Stipulation prevents a utility from offering more generous reconnection terms.

   d. The Utilities will not be required to complete reconnections when reconnection could compromise safe operations; the Utility has proof that the customer benefitted from theft or tampering; or the premises are vacant or unoccupied.
3. **DPAs**

   a. **Ameren Illinois, ComEd, North Shore and Peoples Gas**: Starting as soon as practicable following the Commission’s Order in this proceeding, but no later than April 1, through June 30, 2021:

      i. **Pre-Screen**: When customers contact the utility concerning bill payment-related matters, the CSR will determine whether the utility has a record of the customer previously receiving LIHEAP or other financial assistance, and whether the customer has an arrearage. If the customer has received LIHEAP or other financial assistance, the CSR will provide the customer with information about how to apply for financial assistance, and how to contact an LAA for LIHEAP and/or PIPP assistance. For customers that do not have a record of previously receiving LIHEAP or other financial assistance, the CSR will inform the customer of the income level for the customer’s household size up to and including 300% FPL and that the customer might be eligible for utility assistance (such as DPAs, as provided in Paragraph 3, and the bill payment assistance program, as provided in Paragraph 5), and government assistance.

      ii. **DPA Terms**: Starting as soon as practicable following the Commission’s Order in this proceeding, but no later than April 1, through June 30, 2021:

         1. **Ameren Illinois, ComEd, North Shore and Peoples Gas**

            a. For those residential customers meeting the criteria for up to and including 300% FPL provided immediately above in Paragraph 3.a.i, the Utilities will offer an 18-month / 0% down payment DPA. Enrollment in said DPA following the Commission’s Order in 2021 through June 30, 2021 will exempt from disconnection through and including June 30, 2021, even if the customer defaults on or before June 30, 2021.

            b. All other residential customers will be offered an 18-month / 10% down payment DPA.

            c. In addition, pursuant to Part 280, any customer current on a DPA or who reinstates the DPA after default by making a catch-up payment prior to disconnection, will be removed from collections (and thus, from the disconnection queue).

         2. **Nicor** will offer to enroll any residential customer in an 24-month / 0% down DPA through June 30, 2021. If a
residential customer has entered into a 24-month / 0% down DPA on or after April 1, 2021, Nicor will commit to exempt that customer from disconnection through June 30, 2021.

b. **DPA Recalculation:**

   i. Financial assistance received will automatically offset existing customer arrears without requiring customer request or action.

   ii. In addition, the CSR will inform customers entering into DPAs that the customer will be eligible to renegotiate the DPA upon receipt of any financial assistance funds (e.g., LIHEAP, PIPP, Bill Payment Assistance). Any such DPA changes made at the customer’s request for this DPA recalculation will not be considered to be a DPA renegotiation, and the Utilities will offer the DPA terms as provided in Paragraph 3.a.ii through June 30, 2021.

c. **Discretion to offer more generous DPAs:** Utilities can offer more generous DPA terms (e.g., no or lower down-payments, longer terms, credit) as practicable and as provided in Parts 280.120 and 280.125.

d. **Collaboration with DCEO:** The Utilities commit to continue their ongoing efforts with DCEO to ensure that LIHEAP-eligible customers who have received disconnection notices are not disqualified from receiving reconnection or emergency grants by entering into DPAs or other payment arrangements. The Utilities’ successful resolution of this topic is subject to confirmation by DCEO.

4. **Other Credit and Collections Terms**

   a. **Late Payment Fees**

      i. Pursuant to Part 280, the Utilities will continue to exempt eligible low income customers from late payment fees.

   b. **Deposits**

      i. Pursuant to Part 280, the Utilities will continue to exempt eligible low income customers from deposits. The Utilities will continue to follow Part 280.40 and 280.45 concerning deposits. The Utilities will waive the deposit requirement, for low income customers as defined by Part 280.20, who were previously disconnected and reconnected on the same account, through December 31, 2021.

5. **Bill Payment Assistance Program**

   a. **2021 Programs:** Each Utility will continue, or renew, their Bill Payment Assistance Program through 2021, subject to the specific terms outlined in
the utility-specific addendums. Each Utility’s 2021 BPA will allocate a portion of funding for reconnection assistance. Each Utility’s 2021 BPA Program costs will be recovered from residential customers only. Each Utility may file tariffs and/or tariff modifications pursuant to the special permission provision of Section 9-201(a) of the Public Utilities Act, 220 ILCS 5/9-201(a), to implement, on less than forty-five (45) days’ notice, changes necessary to effectuate the 2021 Bill Payment Assistance Programs.

i. Ameren Illinois: Ameren Illinois will renew the Ameren BPA at 50% of the funding level ($8.0 million total; $5 million electric and $3 million gas) and through the same collections process (Rider EUA June 2021-May 2022, and Rider SPC starting April 2021) as the 2020 Ameren BPA Program. Therefore, Ameren Illinois’ 2021 BPA will be funded at approximately $4 million ($2.5 million electric and $1.5 million gas) and will be collected from residential customers through Rider EUA starting June 2021 through May 2022, and Rider SPC starting April 2021 or as soon as practicable thereafter.

1. In 2021, residential customers are eligible to receive an one-time BPA grant if they have household incomes up to and including 300% FPL, based on Paragraph 3.a.i. The Stipulation Parties will not contest the prudence and reasonableness of determining the customer’s eligibility using the process provided in Paragraph 3.a.i.

2. Eligible electric customers may receive a one-time grant of up to $400, not to exceed the bill balance. Eligible gas customers may receive a one-time grant of up to $300, not to exceed the bill balance.

3. BPA funds may be used to provide reconnection assistance to eligible customers.

4. Ameren Illinois may automatically apply BPA funds to eligible customers.

5. Customers who received BPA funds as a part of the 2020 program are eligible to receive BPA funds as a part of the 2021 program.

6. Moderate Income Funds that remain in the 2020 Ameren BPA program can be re-directed to low income customers.

ii. ComEd: ComEd will renew the ComEd BPA at 50% of the funding level and through the same collections process as the 2020 ComEd BPA Program. Therefore, ComEd’s 2021 BPA will be funded at approximately $9.1 million and will be collected from residential customers through Rider UF starting June 2021 through May 2022.
1. ComEd’s 2021 BPA Program will be available to customers no later than April 1, 2021 and continue until Program funds are exhausted.

2. In 2021, residential customers are eligible to receive a BPA grant if they have household incomes up to and including 300% FPL based on Paragraph 3.a.i. The Stipulation Parties will not contest the prudency and reasonableness of determining the customer’s eligibility using the process provided in Paragraph 3.a.i.

3. Eligible customers will receive a grant of up to $500, not to exceed the bill balance.

4. If a balance remains after the BPA funds are applied, the customer will be required to enroll in a DPA.

5. Up to 25% of BPA funds may be used to provide reconnection assistance to eligible customers.

6. ComEd may automatically apply BPA funds to eligible customers.

7. Customers who received BPA funds in 2020 are eligible to receive BPA funds in 2021. If a customer previously received a BPA grant, the customer will still be allowed, subject to program funding, to receive an additional BPA grant pursuant to this particular Stipulation.

iii. Nicor: Subject to the Commission’s approval to modify the Company’s Rider 26 - Uncollectible Expense Adjustment to allocate the estimated over-collection of uncollectible expense for calendar year 2020 to its new BPA, Nicor will institute a new BPA at a funding level equal to the amount over-collected under its Rider 26 in calendar year 2020 that ordinarily would be credited to customer classes during the period from June 1, 2021 to May 31, 2022 (the total over-collection for 2020 currently estimated at approximately $9 million).

1. In 2021, residential customers are eligible to receive a BPA grant if they have an arrearage balance of more than $300 that has been outstanding to Nicor for more than 60 days (exact parameters to be confirmed by Nicor in a compliance filing based upon analysis of residential accounts in arrears).

2. Eligible residential customers will receive a grant of up to $500, not to exceed the bill balance.
3. Residential customers who received BPA funds in 2020 may be eligible to receive BPA funds in 2021 but in no event shall any residential customer receive more than $800 in total BPA grants.

4. In 2021, commercial customers will receive BPA grants in an aggregate amount corresponding to their allocated portion of uncollectible expense collected in 2020 with eligibility criteria for individual customers to be determined by Nicor in a compliance filing based upon further analysis.

5. BPA funds may be used to provide reconnection assistance to eligible customers.

6. Nicor may automatically apply BPA funds to eligible customers.

iv. North Shore:

1. North Shore will maintain its current BPAP program as is through the end of 2021. The per customer cap will be $500/customer. The approximate level of BPAP grants made as of December 31, 2020 was $277,000. As of December 31, 2020, there are approximately $898,000 in BPAP funds remaining. North Shore will be allowed, at its discretion, to apply BPAP funds for reconnection of Low Income and other customers. If a customer previously received a BPAP grant, the customer will still be allowed, subject to program funding, to receive an additional BPAP grant pursuant to this particular Stipulation.

2. In 2021, residential customers are eligible to receive a BPAP grant if they have household incomes up to and including 300% FPL based on Paragraph 3.a.i. The Stipulation Parties will not contest the prudency and reasonableness of determining the customer’s eligibility using the process provided in Paragraph 3.a.i.

3. Eligible customers will receive a grant of up to $500, not to exceed the bill balance. The total cap for BPAP grant to a customer receiving reconnection assistance shall be $1,000.

4. BPAP funds may be used to provide reconnection assistance to eligible customers.

5. North Shore may automatically apply BPAP funds to eligible customers.
6. Customers who received BPAP funds in 2020 are eligible to receive BPA funds in 2021. If a customer previously received a BPAP grant, the customer will still be allowed, subject to program funding, to receive an additional BPAP grant pursuant to this particular Stipulation.

v. Peoples Gas:

1. Peoples Gas will renew its BPAP at 50% of the funding level of $12 million, and the BPAP cost recovery will be through Rider SPC. Therefore, Peoples Gas’ 2021 BPA Program will be funded at $6 million. The new funding plus any remaining funding will begin starting April 2021.

2. In 2021, residential customers are eligible to receive a BPAP grant if they have household incomes up to and including 300% FPL based on Paragraph 3.a.i. The Stipulation Parties will not contest the prudency and reasonableness of determining the customer’s eligibility using the process provided in Paragraph 3.a.i.

3. Eligible customers will receive a grant of up to $500, not to exceed the bill balance. Note that this cap shall not apply to reconnection assistance. The total cap for a BPAP grant to a customer receiving reconnection assistance shall be $1,000.

4. BPAP funds may be used to provide reconnection assistance to eligible customers.

5. Peoples Gas may automatically apply BPAP funds to eligible customers.

6. Customers who received BPAP funds in 2020 are eligible to receive BPAP funds in 2021. If a customer previously received a BPAP grant, the customer will still be allowed, subject to program funding, to receive an additional BPAP grant pursuant to this particular Stipulation.

6. Communications

a. Phased Targeted Communications: Residential customers with arrearages greater than 30 days will be sent a targeted communication in English and Spanish (except for Ameren Illinois, as provided below) with information about available financial assistance, including BPA Program funds, and available payment arrangements, including federally-funded utility assistance programs, as applicable, and the need to call the utility to establish a DPA. Utilities will send these communications to JCP and Staff
for comment. JCP and Staff shall submit comments no later than 2 business days after receipt for review and comment. Utilities will use best efforts to send this customer communication as soon as possible in coordination with the Disconnection Schedule referenced in Paragraph 1(c), by U.S. Mail and/or electronic mail. Ameren Illinois’ customer communications shall be provided in English, and, in accordance with Part 280.250, should contain the following warning in the appropriate second language typically used by Ameren Illinois for customer communications: “Important – This notice affects your rights and obligations and should be translated immediately.”

7. **COVID-19 Related Costs**
   
a. The costs incurred by the utility to implement this Stipulation shall use the same definitions and receive the same treatment provided in the June 2020 Stipulation. Notwithstanding, costs related to the provisions of this March 2021 Stipulation shall be recoverable by each utility.

b. Each gas utility may file tariffs and/or tariff modifications pursuant to the special permission provision of Section 9-201(a) of the Public Utilities Act, 220 ILCS 5/9-201(a), to implement, on less than forty-five (45) days’ notice, changes necessary to effectuate this term.

8. **Federal Assistance**
   
a. The Parties commit to help the Utilities gain access for their customers to federally-funded COVID-related assistance programs, such as U.S. Treasury Department’s Emergency Rental Assistance Program and Homeowner Assistance Fund, that may be used to provide customers with utility assistance and utility arrearage relief, irrespective of whether the programs are administered by federal, state, county, municipal or private entities. The Parties will discuss the status of utility participation in and customer access to these programs, and the application of these funds on customer utility accounts, at the regular monthly meetings provided below in Paragraph 10.

9. **Customer Status**
   
a. Subject to applicable laws, each Utility will continue its practice of not requiring customers seeking to participate, or continuing to participate, in an Utility-offered financial assistance program to demonstrate, or otherwise provide evidence or documentation of, United States citizenship or legal residency status.

10. **Regular Meetings between the Utilities, Staff and JCP**
   
a. Starting with the first month following the Order approving this Stipulation, the Stipulation Parties will meet monthly, no later than the 20th of each month, through July 20, 2021, to discuss the Stipulation implementation
efforts and results, as well as the Utilities’ Bill Payment Assistance Programs.

11. **Sections 16-111.8 and 19-145 of the PUA.**

   a. The Parties agree that the Utilities’ efforts outlined in this Stipulation satisfy the Utilities’ statutory requirements in Sections 16-111.8 and 19-145 of the PUA that the Utilities pursue minimization and collection of uncollectibles, and are consistent with the requirements provided in 83 Ill. Adm. Code § 280 et seq.

**Enforceability Terms**

1. Stipulation Parties will support this Stipulation and urge its acceptance by the Commission, including, but not limited to, in their testimony, pleadings, and other legal briefs filed in this Proceeding, and on any rehearing or appeal of the Commission’s Order in this Proceeding.

2. Stipulation Parties will not oppose, via rehearing, appeal, or otherwise, the Commission’s Order adopting this Stipulation.

3. The commitments reflected in the terms, including all paragraphs and subparagraphs, of this Stipulation are interdependent and therefore not severable. Thus, if any terms are not adopted by the Commission in whole, are adopted by the Commission on an otherwise modified basis, are subsequently vacated by the Commission or a court, or are modified pursuant to or in response to a Commission order, directive, or request, the entire Stipulation is null and void.

4. Stipulation Parties agree that this Stipulation and all of its terms accord with public policy and Section 1-102 of the Public Utilities Act.

5. No provision or provisions of this Stipulation are in derogation of the Commission’s authority as conferred by the Public Utilities Act or any other statute of this State, nor shall any provision of this Stipulation be construed or interpreted as limiting the Commission’s ability or authority to take such action or enter such order in this Proceeding as it is authorized by law to take or enter, or that the public safety, health or welfare may in the Commission’s view require.

6. Stipulation Parties agree that an electronic signature shall be regarded as an original signature and that this Stipulation may be executed in counterparts.
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<td>Theresa A. Shaw</td>
<td>Theresa A. Shaw</td>
<td>SVP, Reg. Affairs and Financial Services</td>
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d/b/a Ameren Illinois

By: ________________________________
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Title: ________________________________
Date: ________________________________

Northern Illinois Gas Company
d/b/a Nicor Gas

By: ________________________________
Name: Lewis Binswanger
Title: Vice President External Affairs
Date: March 12, 2021

North Shore Gas Company and The Peoples Gas Light and Coke Company

By: ________________________________
Name: ________________________________
Title: ________________________________
Date: ________________________________

Commonwealth Edison Company

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Name: ________________________
Title: _________________________
Date: _________________________

North Shore Gas Company and The Peoples Gas Light and Coke Company

By: __________________________
Name: Theodore T. Eidukas
Title: Vice-President-Regulatory Affairs
Date: March 12, 2021

Commonwealth Edison Company

By: __________________________
Name: ________________________
Title: _________________________
Date: _________________________
Ameren Illinois Company
d/b/a Ameren Illinois

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Northern Illinois Gas Company
d/b/a/ Nicor Gas

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Title: __________________________
Date: __________________________

North Shore Gas Company and The
Peoples Gas Light and Coke Company

By: ____________________________
Name: __________________________
Title: __________________________
Date: __________________________

Commonwealth Edison Company

By: ____________________________
Name: Jane Park
Title: SVP Customer Operations
Date: 3/12/21
Office of the Attorney General on behalf of the People of the State of Illinois

By: Susan L. Satter
Name: Susan L. Satter
Title: Bureau Chief, Public Utilities Bureau
Date: March 15, 2021

City of Chicago

By: ______________________________
Name: __________________________
Title: ____________________________
Date: ____________________________

Community Organizing and Family Issues

By: ______________________________
Name: __________________________
Title: ____________________________
Date: ____________________________

Citizens Utility Board

By: ______________________________
Name: __________________________
Title: ____________________________
Date: ____________________________
Office of the Attorney General on behalf of the People of the State of Illinois

City of Chicago

By: ____________________________

Name: ____________________________

Title: ____________________________

Date: ____________________________

Community Organizing and Family Issues

Citizens Utility Board

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Name: ____________________________

Title: ____________________________

Date: ____________________________
Office of the Attorney General on behalf of the People of the State of Illinois

By: ____________________________
Name: __________________________
Title: ____________________________
Date: ____________________________

City of Chicago

By: ____________________________
Name: __________________________
Title: ____________________________
Date: ____________________________

Community Organizing and Family Issues

By: [Signature]
Name: Karen L. Lusson
Title: Staff Attorney, National Consumer Law Center
Date: March 12, 2021

Citizens Utility Board

By: ____________________________
Name: __________________________
Title: ____________________________
Date: ____________________________
Office of the Attorney General on behalf of the People of the State of Illinois

By: __________________________
Name: _________________________
Title: __________________________
Date: __________________________

City of Chicago

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Name: _________________________
Title: __________________________
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Community Organizing and Family Issues

By: __________________________
Name: _________________________
Title: __________________________
Date: __________________________

Citizens Utility Board

By: __________________________
Name: Julie Soderha
Title: General Counsel
Date: 3/12/21
Legal Aid Society of Metropolitan Family Services

By: _______________________________________

Name: Miguel Keberlein

Title: Executive Director

Date: 3/12/2021

Allen Cherry

By: _______________________________________

Name: _________________________________

Title: _________________________________

Date: _________________________________

Staff of the Illinois Commerce Commission

By: _______________________________________

Name: _________________________________

Title: _________________________________

Date: _________________________________
Legal Aid Society of Metropolitan Family Services

By: ____________________________

Name: __________________________

Title: ____________________________

Date: ____________________________

Allen Cherry

By: Allen Cherry

Name: Allen Cherry

Title: Allen

Date: March 12, 2021

Staff of the Illinois Commerce Commission

By: ____________________________

Name: __________________________

Title: ____________________________

Date: ____________________________
Legal Aid Society of Metropolitan Family Services

By: ________________________________  By: ________________________________

Name: ______________________________ Name: ______________________________

Title: ______________________________ Title: ______________________________

Date: ______________________________ Date: ______________________________

Allen Cherry

Staff of the Illinois Commerce Commission

By: ______________________________

Name: James Zolnierek

Title: Interim Executive Director

Date: March 12, 2021