

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	14-NOI-01
Notice of Inquiry regarding retail	)	
electric market issues.	)	

**AMEREN ILLINOIS COMPANY'S RESPONSE TO  
STAFF'S SUPPLEMENTAL QUESTIONS**

**COMES NOW** Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois or, AIC) and respectfully submits the following comments in response to certain questions presented by the Staff of the Illinois Commerce Commission (Staff) on April 28, 2015. Ameren Illinois reserves the right to respond to additional questions in the future.

**Cancellation/Rescission**

**Question 1 (Directed at AIC):**

**Is it correct that the 12 to 16 calendar day enrollment blackout window for Mass Market customers could only be shortened (even if just by a day or two) if the rescission period found in Part 412.210 were to be modified?**

**AIC Response:**

No, not necessarily. A uniform, reliable reduction in the four-day billing window could result in a situation where the enrollment blackout window for AMI-enabled customers [only] could be reduced by one day absent a change in Part 412. However, AIC is not currently in a position to guarantee that this can be accomplished for all AMI-enabled customers, all of the time. Most of the time, usage data of AMI-enabled customers will be processed for billing on the second day of the four-day billing window, based on reads received from midnight of the first day. But there will be exceptions. For example, there will be situations where due to an AMI network or AMI meter issue

an actual reading from midnight of the first day is not received. Thus, the billing process will be delayed and may require additional actual readings.<sup>1</sup> As a result, AIC is remiss to agree to a uniform reduction that cannot be applied uniformly and consistently to all AMI-enabled customers all of the time.

As emphasized in our previous comments, it is extremely important to note that unlike ComEd, AIC is not deploying AMI technology to 100% of its residential customer base (only 62%). Thus, a change in the blackout windows will not work uniformly for those customers on Automated Meter Reading (AMR) technology or other non-AMI metering. Regardless of any changes applicable to AMI customers, those non-AMI users would still require the current restriction periods noted above and in our previous comments. AIC would rather not employ different practices for AMI-enabled Mass Market customers and non-AMI enabled Mass Market customers, given the additional burdens associated with administering different processes and the strong potential for confusion on behalf of customers, AIC and suppliers alike.

**Question 2 (Directed at All):**

**In the absence of requiring off-cycle switching for residential and small commercial customers, is it worthwhile considering a shortening of the Part 412 rescission period to 8 calendar days?**

**AIC Response:**

No. It would not be worthwhile to consider shortening the Part 412 rescission period to eight calendar days. The current rescission period was the product of much debate in conjunction with the passage and implementation of SB 1299 and is reasonably tailored to protect the interests of both consumers and suppliers. If

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<sup>1</sup> If an actual read is not received by the fourth day of the billing window an estimated reading will be generated and processed.

anything, parties may want to consider lengthening the window to address any real or perceived issues with variable pricing contracts or terms.

The current 10-day window is already eroded by switch confirmation processing and delays incumbent with the mail. These items are largely static. And in the case of the mail, the incumbent delay is outside of the control of the utility or any other relevant party. Reducing the rescission window by even two days will in some situations significantly reduce the amount of time customers actually have to review their switch confirmation and make any corresponding changes.

For example, assume a situation whereby AIC receives an enrollment request on a Thursday and mails the corresponding switch letter to a customer on a Friday. The customer will receive the letter on Monday, at the earliest – already four days into the Part 412 rescission period. Should the customer desire to rescind, they have two primary communication options; they can either call the utility or supplier or contact one of these entities by mail (telephone being the expressly preferred option). Should the customer choose to communicate the rescission via telephone, they have six remaining days to do so under the current terms of Part 412. While a two-day reduction in the Part 412 rescission period represents an already sizeable 20 percent reduction in the current 10-day window, in this scenario it represents an even greater 33 percent reduction in the amount of time actually available for the customer to communicate a rescission by telephone after receiving the switch letter.<sup>2</sup>

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<sup>2</sup> And the problem is compounded for customers responding via U.S. Mail. Using the same hypothetical, if that customer wants to communicate a rescission by U.S. Mail, which is admittedly rarer and not preferred, they would likely need to postmark such communication by Friday of the second week in order for the communication to be received by the utility or the supplier in the 10-day window.

Defining a rescission period is a balancing act between protecting supplier and consumer interests, but decreasing the current period does not seem to appropriately maintain that balance. To date, discussions in the workshops have not addressed the true reasons that a shorter rescission period is necessary to address variable-priced supply product issues. And AIC's customer experience does not indicate that customers are requesting or would be benefitted by a shorter rescission period. Before deciding whether or not to shorten the rescission period it is important to first understand the reasons for shortening the rescission period and who will benefit from the outcome.

**Question 3 (Directed at All):**

**In the absence of requiring off-cycle switching for residential and small commercial customers, is it worthwhile considering an optional shorter rescission period? If so, under which specific circumstances should a RES or customer be able to request the shorter rescission period?**

**AIC Response:**

On page 9 of its Reply Comments, ICEA states that "it may benefit the Commission to explore the experience of other states and utilities with accelerated switching to identify whether challenges, solutions, opportunities, and insights germane to Illinois' situation may be gleaned from them."

AIC is always open to exploring the practices of other companies and jurisdictions. But as indicated above, based on the information known to it at this time, AIC does not believe it is prudent to shorten the current uniform rescission period.

Further, employing non-standardized, optional rescission periods would be burdensome for the utility to administer. This would require the utility to facilitate non-standardized enrollments and tailor switch communications on a case-by-case basis.

Current EDI protocols do not support these types of transactions. In order to allow customers or suppliers to select a rescission period that is less than the current standard, the CPWG would have to coordinate implementation and enhance the EDI Implementation Guides to allow for such functionality. These changes would also likely require corresponding enhancements to AIC's CSS system. And none of the changes, enhancements, and upgrades will come without costs.

Finally, AIC notes that employing a non-standardized rescission period may also present issues with verification and validation of customer consent / agreement to the shorter, non-uniform enrollment periods and result in additional complaints from customer to utilities, suppliers and the ICC.

#### **IV. Conclusion**

Ameren Illinois appreciates this opportunity to provide comments. As discussed in our previous comments, modifying the enrollment process is not the solution to any variable pricing problems. Rather the real solution (at least one of them) lies with better customer education and resources. Likewise, to the extent there is in fact a problem with variable pricing products, tinkering with the enrollment or rescission processes is not the best solution and may misrepresent some of the more fundamental issues being explored. To the point, the questions being explored in this docket seem to more squarely implicate drop processes – a.k.a. leaving an existing supplier - as opposed to facilitating a quicker enrollment to a new one. Although the issues are interrelated, AIC recommends parties remain mindful of the distinction. We look forward to continuing to work together with interested parties to continue to explore these important issues.

Dated: May 15, 2015

Respectfully Submitted,

Ameren Illinois Company  
d/b/a Ameren Illinois



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