

DIRECT TESTIMONY

of

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**Energy Division
Illinois Commerce Commission**

**Central Illinois Light Company d/b/a AmerenCILCO,
Central Illinois Public Service Company d/b/a AmerenCIPS,
and Illinois Power Company d/b/a AmerenIP**

**Proposal to implement a competitive procurement process by establishing Rider
BGS, Rider BGS- L, Rider RTP, Rider RTP- L, Rider D, and Rider MV**

Docket Nos. 05-0160/05-0161/05-0162 (Consolidated)

June 15, 2005

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1 **I. Introduction and Summary**

2

3 **Q. Please state your name and business address.**

4 **A.** My name is Eric P. Schlaf. My business address is 527 East Capitol Avenue,
5 Springfield, Illinois, 62701.

6

7 **Q. By whom are you employed and in what capacity?**

8 **A.** I am employed by the Illinois Commerce Commission ("Commission") as a
9 Senior Economic Analyst in the Energy Division. My primary responsibility is to
10 provide recommendations to the Commission about issues connected with the
11 implementation of the "Electric Service Customer Choice and Rate Relief Law of
12 1997" (220 ILCS 5/16).

13

14 **Q. Please state your educational background and professional experience.**

15 **A.** I obtained a B.A. in 1982 from the University of Illinois at Champaign-Urbana. I
16 received an M.A. in Economics in August 1984 and a Ph.D. in Economics in June
17 1991 from the University of Illinois at Chicago.

18

19 I joined the Commission in March 1990, serving in the Least-Cost Energy
20 Program. In March 1992, I moved within the Commission to the Office of Policy
21 and Planning. The Office of Policy and Planning was subsequently merged into
22 the Energy Division. I have also taught numerous courses in economics and

23 statistics at the University of Illinois at Chicago, Roosevelt University, and the
24 University of Illinois at Springfield (formerly Sangamon State University).

25

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

27 **A.** Yes, many times.

28

29 **Q. What is the purpose of your direct testimony in this proceeding?**

30 **A.** I am offering testimony in response to the proposals offered by Central Illinois
31 Light Company d/b/a AmerenCILCO, Central Illinois Public Service Company
32 d/b/a AmerenCIPS, and Illinois Power Company d/b/a AmerenIP (collectively
33 “Ameren” or “the Companies”) in the following areas: Enrollment requirements
34 for customers with a demand greater than one megawatt (“Rider BGS-L”
35 customers); the Rider D - Default Supply Service Availability Charge (“DSSAC”);
36 the need for a prudence review of electricity purchased outside of the proposed
37 auctions; and, Ameren’s proposed May 2006 date for the initial auction.

38

39 **Q. What are your conclusions from your review of Ameren’s proposals?**

40 **A.** 1. Current bundled customers eligible for the Rider BGS-L service should not
41 be required to enroll in that service if they do not wish to change to an
42 alternative service.
43
44 2. Ameren should be required to file a report with the Commission describing
45 the reasons for any purchases of electricity it undertakes outside of the
46 proposed auctions. Upon receipt of any such report, the Commission
47 should consider opening an investigation to determine whether Ameren’s
48 actions contributed to the need for the additional electricity purchases, and
49 whether customer refunds would be appropriate. The Commission’s order
50 in this proceeding and Ameren’s proposed tariffs should make clear that

51 electricity purchases made outside of the proposed auctions pursuant to
52 Ameren's contingency plans are subject to a subsequent prudence review
53 under these limited circumstances (i.e., where Ameren's actions
54 contributed to the need for the additional electricity purchases).
55

56 3. Ameren should not be permitted to impose the Rider D - Default Supply
57 Service Availability Charge.
58

59 4. Ameren should conduct its auction in July 2006, rather than in May 2006
60 as it proposes.
61

62 **II. Bundled Service for Rider BGS-L Customers**

63 **A. Enrollment Requirements**

64 **Q. What is Ameren's enrollment proposal applicable to the customers that are**
65 **eligible for Rider BGS-L service?**
66

67 **A.** Ameren proposes that customers eligible for Rider BGS-L service must enroll
68 during the 30-day enrollment period in order to take the service on January 2,
69 2007.¹ Customers that do not elect Rider BGS-L service during the enrollment
70 period would be ineligible to take that service until the beginning of the next term
71 (i.e., June 2008). Such customers would be permitted to take any other service
72 for which they qualify, including delivery service combined with Retail Electric
73 Supplier ("RES") generation service or Ameren's real-time pricing service Rider
74 RTP-L.
75

76
77 **Q. Please comment on this proposal.**

78 **A.** Any enrollment restrictions placed on Rider BGS-L customers desiring to take
79 bundled service would present a significant departure from current bundled

80 service requirements. Essentially, there are currently few, if any, enrollment
81 restrictions. Bundled service is generally available on demand to the customers
82 that qualify for the service and delivery services customers may return to bundled
83 service by providing proper notice to Ameren.

84
85 I would also note that Ameren's proposal to allow Rider BGS-L customers only a
86 short time to decide whether to strike a deal with a RES or to take bundled
87 service could discourage the growth of retail competition. Once a customer is
88 enrolled for the Rider BGS-L service, it would be ineligible to move off that
89 service until the beginning of the next service term. The initial 17-month term is a
90 considerable length of time for customers to be prohibited from taking service
91 from competitive suppliers.

92
93 **Q. Even though an enrollment requirement would impose a new burden on**
94 **Rider BGS-L customers, is it appropriate, in your opinion, to have an**
95 **enrollment requirement for customers who wish to take the Rider BGS-L**
96 **service?**

97 **A.** Yes. Despite its drawbacks, the Company's basic proposal to require an election
98 period and to require a service term is appropriate for the Rider BGS-L demand
99 class. Unlike the residential class, this demand class has exhibited an

¹ "Terms and Conditions," proposed Rider BGS-L, Original Sheet No. 23.001.

100 appreciable propensity to switch from bundled service to RES service.² If there
101 were no enrollment requirements – that is, if there were no exit or entry
102 restrictions – suppliers bidding to supply generation services for the Rider BGS-L
103 service customers would likely add a significant, and probably unacceptably
104 large, risk premium to their bids to compensate them for switching risk (i.e.,
105 “migration risk”). In contrast, it would not be appropriate to impose enrollment
106 requirements for the customer groups that have not demonstrated an interest in
107 switching, since the expected switching risk would be negligible for these groups.
108

109 **Q. Why did Ameren choose a 30-day enrollment window?**

110 **A.** Ameren indicates that the 30-day enrollment window represents a tradeoff
111 between providing sufficient time for customers interested in switching to RES
112 service and the expected risk premium that the open enrollment window could
113 create. However, the 30-day requirement apparently was not based on any
114 empirical analysis that could estimate the effect on supplier bids and resulting
115 power costs of a longer (or shorter) enrollment window.³
116

117 **Q. Is Ameren’s proposal to allow Rider BGS-L customers 30 days to decide**
118 **whether to take bundled service a reasonable amount of time for**
119 **customers to make that decision?**

² See, for example, “Electric Switching Statistics (DASR)” at <http://www.icc.illinois.gov/ec/switchstats.aspx>.

³ Company response to Illinois Industrial Energy Consumers’ Data Request No. 2-6.

120 **A.** It is difficult to determine whether Rider BGS-L customers should have 30 days
121 or some longer period of time to determine whether they wish to take bundled
122 service. On the one hand, since customers and RESs cannot arrange their deals
123 instantaneously, some reasonable amount of time is needed after the auction is
124 concluded and the fixed bundled price becomes available. On the other hand,
125 the longer the enrollment period the larger the premium suppliers are likely to
126 add to their bids to account for potential adverse market price movements after
127 the auction is concluded.

128
129 In the absence of empirical information showing the potential effect on supplier
130 bids of increasing the 30-day period to some longer period, I recommend that the
131 Commission permit Ameren to impose a 30-day enrollment requirement for the
132 initial auction. I also recommend that this issue be studied in more detail prior to
133 the next auction. However, should comments from RESs and/or customers
134 clearly indicate a reasoned basis for a longer period, or should empirical
135 information presented in this proceeding show that a longer period would have
136 only a minimal effect on supplier bids, I would reconsider my recommendation.

137

138 **B. Rider BGS-L Service Enrollment Requirement for Existing Bundled**
139 **Customers**

140
141 **Q. Would current bundled customers in the Rider BGS-L demand class who**
142 **wish to stay on bundled service be automatically transferred to the Rider**
143 **BGS-L service?**

144 **A.** No. All customers, including bundled customers, who wish to take the Rider
145 BGS-L service would be required to make an affirmative election indicating their
146 intention to take the service.⁴

147

148 **Q. Please comment on this aspect of the Company's Rider BGS-L proposal.**

149 **A.** The Company's proposal creates the possibility that Rider BGS-L customers that
150 do not have any interest in moving from bundled service will inadvertently be
151 forced off that service because they fail to make an enrollment election. A
152 customer's failure to make the Rider BGS-L service election could result in the
153 customer being placed on the real-time service Rider RTP-L. Historically, few
154 Ameren customers have chosen real-time pricing service.⁵

155

156 **Q. Do you have a recommendation about Ameren's proposal to require**
157 **existing bundled customers in the Rider BGS-L demand class to re-enroll**
158 **for bundled service?**

159 **A.** Yes. After more than five years of the Customer Choice era, it is reasonable to
160 conclude that most current bundled customers are taking that service because
161 they prefer bundled service to the alternatives. With that in mind, I recommend
162 that the Rider BGS-L service become the default service, rather than the real-
163 time pricing service Rider RTP-L, for customers currently on bundled service.
164 That is, customers taking bundled service that do not make a different supply

⁴ "Terms and Conditions," proposed Rider BGS-L, Original Sheet No. 23.001.

165 choice during the 30-day enrollment window would remain on the bundled
166 service and would be automatically transferred to the Rider BGS-L service. This
167 proposal would be less burdensome on customers than Ameren's proposal,
168 since customers will not have to make a supply election if they do not wish to
169 move from their existing service. I would note, that despite the significant
170 amount of Ameren industrial load that has switched to RESs, the majority of
171 Ameren customers with a demand greater than one MW are still taking bundled
172 service. In the AmerenCILCO service territory, 88 out 90 customers in that
173 demand category are taking bundled service; in the AmerenCIPS service
174 territory, 106 out of 140 customers are taking bundled service; and, in the
175 AmerenIP service territory, 126 of the 209 customers with a demand over one
176 MW are taking bundled service.⁶

177

178 **Q. How would this proposal fit in with Ameren's customer education plans**
179 **concerning customer enrollment requirements?**

180 **A.** While Ameren has not finalized its educational plans with respect to providing
181 customers enrollment requirements, it does plan to provide mailings containing
182 pertinent enrollment information. Ameren may also contact customers, either by
183 phone or in-person, to discuss enrollment requirements.⁷ Presumably, under
184 Ameren's current proposal, the primary message to be imparted to customers
185 through the educational information is that customers can only take bundled

⁵ Only two Ameren customers are currently taking real-time pricing service (Company response to ICC Staff Data Request EPS 2.07).

186 service if they enroll for that service during the 30-day enrollment window.

187 Ameren would make clear that, with the exception of new customers (discussed
188 below) there are no exceptions to this rule and that bundled customers that do
189 not make a supply selection would be placed on Rider RTP-L.

190
191 Under my proposal, Ameren would emphasize to customers the importance of
192 making a supply selection and that current RES customers that wish to switch
193 from RES service to bundled service must enroll during the 30-day enrollment
194 window. Ameren would also inform customers that they would remain on
195 bundled service unless they notify Ameren during the 30-day period enrollment
196 period of their intention to switch to another service. Ameren would
197 communicate this message at least 60 days in advance of the ending of the
198 enrollment window.

199
200 **Q. How does your proposal compare to the renewal and enrollment policy**
201 **under AmerenIP's offering of Power Purchase Option ("PPO") service?**

202 **A.** It is my understanding that AmerenIP's PPO customers are notified 60 days prior
203 to the expiration of their service term that their PPO service term would be
204 automatically renewed for another year unless they make a new supply selection
205 during the PPO enrollment period.

206

⁶ "Electric Switching Statistics (DASR)" at <http://www.icc.illinois.gov/ec/switchstats.aspx>.

⁷ Company Response to ICC Staff Data Request EPS 1.04.

207 **C. New Customers Eligible for Rider BGS–L Service**

208
209 **Q. What is Ameren’s proposal with respect to new customers that wish to take**
210 **the Rider BGS-L service?**

211 **A.** New customers may elect Rider BGS–L service on the date they establish
212 service with Ameren. Their service term would then end at the service term
213 applicable to all other customers taking the Rider BGS-L bundled service.
214 Ameren defines New Customer as follows: “New [customer] is defined as an
215 account served from a new distribution extension or a successor account.”⁸ This
216 definition seems reasonable, assuming that “successor account” refers to a new
217 account at an existing location.

218
219 **III. Rider D - Default Supply Service Availability Charge**

220
221 **Q. What is the DSSAC?**

222 **A.** The DSSAC is a charge imposed on two types of customers with a demand over
223 one MW: (1) customers that that choose Ameren’s real-time pricing service
224 Rider RTP-L and (2) RES customers that are defaulted to Rider RTP-L when
225 they lose their source of supply. All revenues collected under the DSSAC is
226 returned to the winning bidders in the Rider BGS-L auction.⁹ The DSSAC is set
227 at \$0.00015/kWh (0.015 cents/kWh).¹⁰

228

⁸ Proposed Rider BGS–L, Original Sheet No. 23.001.

⁹ Company Response to EPS Data Request 2.03.

229 **Q. What is the purpose of the DSSAC?**

230 **A.** The DSSAC is intended to compensate winning Rider RTP-L bidders for the cost
231 of standing ready to provide capacity for the customers that either choose Rider
232 RTP-L or who are defaulted to that service. Since there is no enrollment window
233 for Rider RTP-L, winning suppliers will not be able to determine the load they
234 must serve at any given time and thus the load could change on short notice.
235 The uncertainty in the amount of load that might be needed to be served will
236 induce bidders to add a risk premium to their bids, if they bid at all. The DSSAC
237 would encourage suppliers to bid, and to reduce the risk premium that bidders
238 they would add to their bids, since it would provide a revenue stream to winning
239 bidders even if customers do not take the service.¹¹

241 **Q. How was the charge of 0.015 cents/kWh determined?**

242 **A.** According to the Company, the specific charge of 0.015 cents/kWh " ...was
243 established as a proxy for the capacity planning costs such [RTP-L] customers
244 are imposing on RTP-L suppliers."¹² However, the Company has not provided
245 any information as to how it determined that 0.015 cents/kWh would accurately
246 represent the costs imposed on winning bidders. Since there currently is no
247 capacity market administered by the Midwest Transmission System Operator
248 ("MISO"), the Company may have been guided by the cost of capacity in the PJM

¹⁰ Company Response to EPS Data Request 2.02.

¹¹ Company Response to EPS Data Request 2.01.

¹² Company Response to EPS Data Request 2.01.

249 capacity market and/or the New Jersey Board of Public Utilities' decision to allow
250 a charge of the same amount.¹³

251

252 **Q. Will bidders have difficulty in estimating the size of the load for which they**
253 **may have to provide capacity to Rider RTP-L customers?**

254 **A.** Yes. Bidders will have difficulty in judging the size of the load for which they
255 would have to stand ready to provide capacity. While few might actually do so,
256 any RES customer could jump to Rider RTP-L on as little as seven days notice.¹⁴
257 Winning bidders will be obligated to supply capacity for all customers that take
258 the service. The load uncertainty will cause bidders to a risk premium to their
259 bids, and it is reasonable to expect that bidders' bids will factor in those costs.

260

261 **Q. Has Ameren provided any evidence that imposition of the DSSAC would**
262 **encourage bidders to bid, and to reduce the risk premium that bidders add**
263 **to their bids?**

264 **A.** No, and it very well could be the case that winning bidders will simply collect the
265 DSSAC and will not reduce the risk premium.

266

267 **Q. What would be the effect of the imposition of the DSSAC on RES**
268 **customers and retail competition?**

¹³Order, New Jersey Board of Public Utilities, Docket Nos. EX01110754 & EO02070384, p. 12, December 18, 2002.

¹⁴Proposed Rider MV, Original Sheet No. 27.031.

269 **A.** The DSSAC would raise the cost of switching from bundled service to RES
270 service, albeit by a small amount. RES customers would pay for the capacity
271 costs associated with taking generation service from their suppliers and a
272 capacity cost associated with a service for which they are eligible but that very
273 few customers would have any interest in receiving. The extra cost could have a
274 small deterrent effect on retail competition.

275

276 **Q. How would imposition of the DSSAC affect the customers who wish to take**
277 **Rider RTP-L as their chosen supply option?**

278 **A.** If, as the Company suggests, the DSSAC is roughly equivalent to the amount of
279 the risk premium that bidders would add to their bids, and the auction is
280 competitive, then imposition of the DSSAC on RES customers would reduce
281 Rider RTP-L capacity charges by the amount of the DSSAC. Thus, if the
282 Company is correct, imposition of the DSSAC would benefit the customers that
283 choose (i.e., are not defaulted to) Rider RTP-L because their rate would not be
284 increased by the amount of the cost of uncertainty. If the Company is not
285 correct, and bidders simply collect the DSSAC without reducing their bids by the
286 amount of the DSSAC, there would be no effect on the customers that take Rider
287 RTP-L by choice.

288

289 **Q. Do you think Ameren should be permitted to impose the DSSAC on RES**
290 **customers?**

291 **A.** No. While the DSSAC is relatively small, imposition of the DSSAC would
292 nevertheless raise costs for all RES customers while not necessarily providing
293 corresponding benefits for actual or potential Rider RTP-L customers.

294

295 **IV. Prudence Review for Electricity Purchased Outside the**
296 **Proposed Auctions**

297

298 **Q. What are Ameren's contingency plans should the Company need to**
299 **purchase electricity for its bundled customers outside of the proposed**
300 **auctions?**

301 **A.** Ameren has developed contingency plans for the three following scenarios listed
302 below.¹⁵ Should any of these scenarios occur, Ameren would need to purchase
303 additional or replacement electricity.

- 304 1. Undersubscription of the auction
305 2. Supplier default prior to or during the auction
306 3. Commission rejection of the auction results

307

308 **Q. Should any of the scenarios listed above occur, what is your**
309 **understanding as to whether Ameren would need additional approval from**
310 **the Commission to charge customers for any costs associated with the**
311 **implementation of contingency plans?**

¹⁵ Ameren Exhibit 3.0, pp. 18-22.

312 **A.** My understanding is that Ameren is proposing that costs associated with the
313 procurement of electricity as a result of the implementation of its contingency
314 plans could be passed along to customers without additional Commission review
315 or approval. The ratemaking formulas listed in proposed Rider MV include a
316 Contingency Supply Factor (“CSF”) that represents costs associated with the
317 contingency plans.

318

319 **Q. Please briefly describe Ameren’s contingency plans.**

320 **A.** The contingency plans vary by scenario. If the auction is undersubscribed – i.e.,
321 if the amounts Ameren purchases in the auction are less than Ameren’s load
322 requirements – then Ameren would purchase energy through markets
323 administered by the MISO until the next scheduled auction. In the event that
324 there is no MISO-administered capacity market by 2007, Ameren would buy
325 capacity through bilateral capacity markets. If a winning bidder defaults, Ameren
326 would purchase replacement electricity through MISO markets if less than 90
327 days remain until the next auction or, if more than 90 days remain, Ameren would
328 acquire the needed electricity either through a Request for Proposal solicitation
329 process. In the case where the Commission completely rejects the auction
330 results, Ameren, in consultation with Staff, would develop a procurement plan
331 that would be submitted to the Commission for approval, unless the reason for
332 the auction failure was easily correctable. In such a situation, it is expected that
333 the auction would be re-run.

334

335 **Q. Does Staff have an objection to these contingency plans?**

336 **A.** No. In each scenario, Ameren would have few supply acquisition alternatives. In
337 the case where the auction is undersubscribed, Ameren's proposal to turn to
338 MISO's markets would be preferable to conducting bilateral negotiations with
339 bidders for the needed electricity or holding another auction. As Ameren witness
340 Blessing explains, bidders would have a diminished incentive to participate in the
341 auction if they believed that an undersubscribed auction might allow them the
342 opportunity to negotiate with Ameren outside the auction.¹⁶ An alternative would
343 be to hold another auction for the small amount of extra electricity that might be
344 needed, but, given that the initial auction was undersubscribed, it is uncertain
345 whether a second auction would produce more supplier interest than the initial
346 auction. In the case of supplier default during the supply period, the cost of
347 holding a new acquisition process might be more than the benefits received from
348 such a process, and there is no guarantee that the acquisition process would
349 produce a superior result compared to MISO markets.

350
351 If the Commission rejects the auction results, Ameren's plan to submit a new
352 supply plan to the Commission for approval would be appropriate. It would be
353 especially necessary in circumstances where running a new auction would not
354 address and resolve the reasons why the initial auction failed.

355

¹⁶ Ameren Exhibit 3.0, p. 20

356 **Q. Why should Ameren use MISO markets should it need additional or**
357 **replacement electricity?**

358 **A.** First, from an administrative standpoint, it would likely be both more convenient,
359 and likely the least costly, for Ameren to purchase replacement electricity directly
360 from MISO. A second reason is that if the MISO market is competitive, concerns
361 about any seller influencing the market price would be minimized. Third, in the
362 situation where supplier default is the reason that additional electricity is needed,
363 any additional costs associated with MISO market purchases should be offset to
364 some extent by the collateral suppliers must provide to Ameren.

365
366 **Q. Are there circumstances in which it might be appropriate for the**
367 **Commission to review the costs associated with the purchase of**
368 **replacement electricity?**

369 **A.** It would be appropriate in a circumstance in which Ameren's own actions
370 precipitated a need for replacement electricity. This could occur, for example, in
371 a scenario in which Ameren's tardiness in paying a supplier put the supplier in
372 financial difficulty, and ultimately led to the supplier's defaulting on its supply
373 obligation.¹⁷ In this circumstance, or any other similar circumstance, ratepayers
374 should not be obligated to pay for the additional costs associated with obtaining
375 replacement electricity.

376

¹⁷ See pages 1-2 of Attachment 2 to the Company's response to Citizens Utility Board Data Request 1-30.

377 **Q. Do you have a recommendation concerning any electricity purchases that**
378 **Ameren makes outside of the proposed auctions?**

379 **A.** Yes. I recommend that, in every instance in which Ameren needs to purchase
380 electricity outside of the proposed auctions, Ameren should file a report with the
381 Commission explaining its reasons for purchasing the additional electricity. A
382 copy of this report should also be sent to the Director of the Energy Division. I
383 also recommend that after receiving any such report Staff should advise the
384 Commission as to whether the Commission should open an investigation to
385 determine whether Ameren's own actions contributed to the need for the
386 additional electricity purchases and whether customer refunds would be
387 warranted. I further recommend that the Commission's order in this proceeding
388 and Ameren's proposed tariff make clear that electricity purchases made outside
389 of the proposed auctions pursuant to Ameren's contingency plans are subject to
390 a subsequent prudence review under these limited circumstances (i.e., where
391 Ameren's actions contributed to the need for the additional electricity purchases).

392
393 **V. Auction Date**

394 **Q. What is Ameren's position as to the date of the auction?**

395 **A.** Ameren proposes that the auction be held in May 2006.¹⁸

396
397
398 **Q. What auction date has ComEd proposed in Docket No. 05-059?**

¹⁸ Proposed Rider MV, Original Sheet No. 27.026.

399 **A.** ComEd proposes an auction date of September 2006.¹⁹

400

401 **Q.** What is Staff's position with respect to the date of the auction?

402 **A.** Staff recommends that a combined auction be held in July 2006. Staff believes
403 that that there is work to be done after the Commission's order in this docket to
404 prepare for the auction. Since this is the first auction of its kind used by Illinois
405 electric utilities to procure power supply, it is best to take considerable time to
406 make sure that adequate planning and testing has taken place. Staff's proposal
407 to move the auction date to July 2006 adds two months to the time allowed for
408 auction preparations. Additionally, as a point of reference, New Jersey's first two
409 auctions, in 2001 and 2002, took place less than six months prior to the delivery
410 date of the electricity procured in those auctions. A July 2006 auction date is
411 thus consistent with New Jersey's auction experience in this respect. Table 2,
412 below, shows the number days between the New Jersey Board of Public Utilities'
413 Orders and the auctions and between the auctions and the start of electricity
414 delivery, for the last four New Jersey auctions. Table 2 also shows Ameren's
415 and ComEd's proposals, as well as Staff's proposal, each assuming that the
416 auction takes approximately eight days.

417

418

419

¹⁹ Proposed Rider CPP, Original Sheet No. 266.

420 **Table 2 - Days Between Auction End and Delivery Start in New Jersey Electricity**

421 **Auctions and Ameren, ComEd and Staff Proposals²⁰**

	NJ 1st auction		NJ 2nd auction	
	Date	Days	Date	Days
Order	12/11/2001		12/18/2002	
Auction start	2/4/2002	55	2/3/2003	47
Auction end	2/12/2002	8	2/4/2003	1
Delivery start	8/1/2002	170	8/1/2003	178

	NJ 3rd auction		NJ 4th auction	
	Date	Days	Date	Days
Order	12/2/2003		12/1/2004	
Auction start	2/2/2004	62	2/10/2005	71
Auction end	2/10/2004	8	2/15/2005	5
Delivery start	6/1/2004	112	6/1/2005	106

	IL Ameren ²¹		IL ComEd	
	Date	Days	Date	Days
Order	1/27/2006		1/27/2006	
Auction start	5/1/2006	94	9/5/2006	221
Auction end	5/9/2006	8	9/13/2006	8
Delivery start	1/1/2007	237	1/1/2007	110

	Staff Proposal			
	Date	Days		
Order	1/27/2006			
Auction start	7/11/2006	165		
Auction end	7/19/2006	8		
Delivery start	1/1/2007	173		

²⁰ Source: New Jersey Board of Public Utilities website for BGS-related documents (<http://www.bpu.state.nj.us/home/bgs.shtml>).

²¹ Proposed Rider MV, Original Sheet No. 27.026.

422

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

424 **A.** Yes, it does.