

**ILLINOIS COMMERCE COMMISSION**

**DOCKET NOS. 05-0160, 05-0161 and**

**05-0162 (consolidated)**

**REBUTTAL TESTIMONY**

**OF**

**ROBERT J. MILL**

**Submitted On Behalf**

**Of**

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

**July 13, 2005**

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**ILLINOIS COMMERCE COMMISSION**  
**DOCKET NOS. 05-0160, 05-0162, AND**  
**05-0162 (CONSOLIDATED)**  
**REBUTTAL TESTIMONY**  
**OF**  
**ROBERT J. MILL**

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

A. My name is Robert J. Mill. My business address is One Ameren Plaza,  
1901 Chouteau Avenue, St. Louis, Missouri 63103.

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

A. I am employed by Ameren Services Company as the Director of the Regulatory  
Policy and Planning Department.

**Q. Are you the same Robert J. Mill that previously filed direct testimony in this proceeding?**

A. Yes, I am.

**Q. What is the purpose of your rebuttal testimony?**

A. The purpose of my testimony is to respond, on behalf of the Ameren Companies,  
to certain issues raised in the testimony of Staff witnesses Mr. Peter Lazare, Mr.  
Scott Struck, Mr. Stephen Knepler, Dr. Eric Schlaf, Ms. Cheri Harden and Ms.  
Mary Selvaggio; issues raised by Illinois Industrial Energy Consumers (IIEC)  
witnesses Mr. Robert Stephens and Mr. Brian Collins; by Dr. Philip O'Connor  
representing the Coalition of Energy Suppliers (CES); and by Mr. William  
Steinhurst on behalf of the Citizens Utility Board (CUB).

24 **Q. Can you briefly describe the areas on which you will be testifying?**

25 A. Yes. I will be responding to issues regarding the proposed adjustments to the  
26 Basic Generation Service (BGS) prices, and the operation and administration of  
27 certain adjustment mechanisms contained in Rider MV. I also comment on  
28 whether there is a need for dockets to be initiated between auctions and whether  
29 renewable energy initiatives need to be coordinated with this docket as has been  
30 proposed by some parties in these cases. Additionally, I address the propriety of  
31 renewable energy being procured as part of the auction process.

32 **Q. Will you please provide a brief summary of your testimony?**

33 A. Yes. Staff and other parties are generally supportive of the provisions in the  
34 Ameren Companies' proposed Rider MV to translate market clearing prices into  
35 prices for BGS service to customers, including: provisions for adjustment  
36 mechanisms that are applicable to the results of the translation prism; the Market  
37 Value Adjustment Factor (MVAF); and the Contingency Supply Factor (CSF).  
38 However, Staff and intervenors have proposed a number of modifications to Rider  
39 MV and to the MVAF and CSF. Ameren Companies' witness Wil Cooper will be  
40 responding to rate design and translation related issues and as I stated I will be  
41 responding to issues regarding the adjustment mechanisms, issues related to  
42 subsequent proceeding and renewables. The Ameren Companies are able to  
43 accept, or to accept with appropriate modifications, many of those proposals as  
44 will be discussed in my testimony. My failure to acknowledge an issue or  
45 position taken by a party in my testimony does not constitute my endorsement of  
46 such issue.

47 **ADJUSTMENTS TO BGS PRICES**

48 **Q. Staff witness Struck disagrees with the Ameren Companies' Rider MV**  
 49 **provision that calls for supply-related uncollectible expense to be adjusted**  
 50 **between rate cases. Instead, Mr. Struck proposes that supply-related**  
 51 **uncollectible expense only be established by the Illinois Commerce**  
 52 **Commission (ICC or Commission) in subsequent electric rate cases. Do you**  
 53 **agree?**

54 A. Yes. I am willing to concede my original view that uncollectible expense  
 55 applicable to supply charges should be adjusted between delivery service rate  
 56 cases in favor of Mr. Struck's proposal. The Supply Procurement Adjustment  
 57 (SPA), Cash Working Capital and Uncollectible Adjustment as defined on Sheet  
 58 Nos. 27.048 and 27.049 of Rider MV, should only be established in the context of  
 59 future delivery services rate cases. I further agree with Mr. Struck that the  
 60 Commission should determine both the methodology and the value for the  
 61 uncollectible adjustment, as well as for the other two adjustments in the next  
 62 delivery services rate case. There is a significant cost to the Ameren Companies  
 63 for managing the procurement function as well as the cash flows for purchased  
 64 power expense with receipt of revenues for such service. These matters, or at least  
 65 the values, are best suited to be determined in the next delivery rate cases when all  
 66 needed information is available.

67 **Q. Dr. O'Connor recommends that the SPA should be revised to better reflect**  
 68 **the direct and indirect costs related to administering the procurement**  
 69 **process. Do you agree with his recommendations?**

70 A. As my testimony as well as the provisions set forth on Sheet No. 27.048 of Rider  
 71 MV indicate,, the SPA applicable to the initial and subsequent supply charges will  
 72 have to be established during the delivery service rate cases where all costs of  
 73 operations for the Ameren Companies are reviewed and assigned to the relative

74 functional category, including direct and appropriate indirect costs, subject to  
75 final approval by the Commission. Whatever these costs are should be sorted out  
76 at that time. Similarly, Dr. O'Connor and his colleagues are also recommending  
77 that the SPA be evenly allocated and collected on a volumetric basis, expressing a  
78 concern that its current weighting overstates costs to residential and small  
79 customers. Unless there are compelling reasons otherwise, the Ameren  
80 Companies are proposing that the SPA costs are allocated, and recovered, across  
81 the BGS and RTP classes on an energy volumetric basis, meaning they will be  
82 equally weighted across the supply kilowatt-hours of all classes. The Ameren  
83 Companies' specific concern in this proceeding is designing mechanisms such that  
84 no prudently incurred costs fall through the cracks.

85 **Q. The panel of John Domagalski and Richard Spilky on behalf of CES propose**  
86 **that the SPA be tracked in the MVAF to ensure that the Ameren Companies**  
87 **neither over- nor under-collect for this expense on an ongoing basis. Do you**  
88 **agree?**

89 A. Yes. I would accept their recommendation as being reasonable, Such provision  
90 assures customers that the Ameren Companies would collect no more and no less  
91 than the revenue requirement amounts established for the SPA component in a  
92 delivery services rate case.

93 **Q. Do you have any comments regarding CES' proposed treatment of**  
94 **uncollectible expenses?**

95 A. Yes. Regarding the separation of uncollectible expenses between delivery  
96 services and energy supply, the Ameren Companies agree that uncollectible  
97 expenses should be separated between delivery services and energy supply.  
98 Again, the methodology will be determined in the next delivery services rate case

99 when specific test year data exists. The Ameren Companies have not made a final  
100 determination, but my proposal in the upcoming delivery service rate proceeding  
101 is to establish a “factor” based on the relative relationship between total  
102 uncollectible expenses to the total bundled revenue amounts. That factor would  
103 then be applied to the BGS (adjusted) price to account for the expected level of  
104 uncollectible BGS bill amounts. An added step in the determination of an  
105 uncollectible factor will be to establish such factor individually for each supply  
106 rate class based on the test year experience of such classes. This will properly  
107 reflect the fact that the residential customer class causes a greater percentage and  
108 expense for total uncollectible expense than do other rate classes. This  
109 historically has been the case in establishing retail bundled rates. The same factor  
110 established for each class would be applied to the delivery service component.  
111 The factor would only be adjusted during a rate case as stated above in response  
112 to Mr. Struck’s testimony.

113 **Q. In the direct testimony of Ms. Selvaggio, she makes several suggestions that**  
114 **would modify language in Rider MV as to the operation and administration**  
115 **of the MVAF and CSF. Will you please describe each of those suggestions**  
116 **and indicate whether they are acceptable?**

117 A. Yes. First, Ms. Selvaggio proposes to modify the phrase used to represent costs  
118 in the Ameren Companies’ proposed Rider MV tariff setting forth the MVAF  
119 from “Payments that the Company makes to suppliers” to “Expenses the  
120 Company incurs”. I accept this change as proposed at lines 80-89 of her direct  
121 testimony. Next, Ms. Selvaggio properly points out that the definition for Term C  
122 in the MVAF formula of Rider MV was missing from the tariff. Ms. Selvaggio  
123 recommends that the wording of Term C be consistent with Commonwealth

124 Edison Company's (ComEd) Rider CPP. I will adopt her wording for Term C as  
125 shown at lines 99-101 of her direct testimony.

126 Ms. Selvaggio also recommends that the Remaining Balance Factor (RB  
127 Factor) for the MVAF and CSF should include a provision for interest to be  
128 established pursuant to 83 Ill Adm. Code 280.70 (e) (1). However, Ms. Selvaggio  
129 doesn't explain how she intends the interest addition to the RB Factor to be  
130 calculated and applied to the MVAF or to CSF Factor RB balances I am  
131 concerned that this refinement will add additional complexity and cost to the  
132 administration of the MVAF and CSF and will require additional record keeping  
133 and accounting measures. There will typically only be an average of about 60  
134 days between the time a MVAF or CSF is billed and the time when any resulting  
135 RB factor is reflected in a subsequent MVAF or CSF applicable charge. The  
136 most significant factor giving rise to the RB Factor is the difference between  
137 forecasted customer usage and actual usage for a given month. It is expected that  
138 the Factor RB values will fluctuate between credit and debit values based largely  
139 on variations of weather to normal. I see no compelling reason to modify the  
140 Factor RB language at this time for the inclusion of interest.

141 Finally, Ms. Selvaggio recommends language be added that provides for a  
142 Commission ordered reconciliation factor to refund or recover MVAF or CSF  
143 amounts ordered by the Commission, plus interest. Unlike my previous concerns  
144 regarding the addition of interest to Factor RB, it seems reasonable to require  
145 interest be added to a Commission ordered refund amount since such refund  
146 period could cover many months prior to being returned to customers, unlike my

147 view that an interest component of Factor RB would be immaterial and will  
148 fluctuate between debit and credit balances. I believe her proposal for a Factor O  
149 is reasonable and should be added to the MVAF and CSF formulas in Rider MV.

150 In summary, except for Ms. Selvaggio's interest recommendation for  
151 Factor RB, I accept all of her other recommended language changes to the MVAF  
152 as summarized in her testimony at lines 146-169, and for the CSF changes as  
153 summarized at lines 221-252.

154 **Q. Mr. Knepler makes a number of recommendations designed to provide more**  
155 **time for the Staff to review the monthly MVAF and CSF filings and also**  
156 **desires to establish Annual Reconciliation cases for (a) reviewing the cost**  
157 **mechanism on an annual basis to ensure that the Ameren Companies'**  
158 **process is effective; and (b) correcting omissions, errors, or misclassifications**  
159 **of cost. Do you agree with these recommendations?**

160 **A.** Yes. The Ameren Companies will accept his recommendation that the adjustment  
161 riders be filed no later than the 20<sup>th</sup> day of each month. This will permit more  
162 time for Staff review of the filing and will allow the Ameren Companies time to  
163 refile the adjustment factors prior to the effective month should an error be  
164 discovered. The Annual Reconciliation process seems reasonable as presented in  
165 the testimony, the focus being the accuracy of accounting and to make sure that  
166 the MVAF reflects actual costs and the reconciliation of revenues with the actual  
167 costs.

168 **Q. In addition to the submission of an annual report summarizing the operation**  
169 **of the adjustment mechanisms that I proposed in my direct testimony, Mr.**  
170 **Knepler recommends that there be two additional reports submitted to the**  
171 **ICC. Will you please summarize the three reports as Mr. Knepler has**  
172 **defined them?**

173 **A.** Yes, Mr. Knepler lists the reports and describes their purposes as follows:

- 174 1. Market Value Adjustment Factor and Contingency Supply Factor  
175 Reports. No later than April 1 of each year, the Company shall submit  
176 a report to the Staff that summarizes the operation of the MVAF and  
177 the CSF for the preceding calendar year.
- 178 2. Annual Reconciliations Report. No later than April 1 of each year, the  
179 Company shall submit a reconciliation of its electric power and energy  
180 costs with recoveries to the Commission's Director of the Energy  
181 Division and Director of the Financial Analysis for the preceding  
182 calendar year.
- 183 3. Internal Audit Reports. No later than April 1 of each year, the  
184 Company shall submit an internal audit report of Rider MV activities  
185 for the previous calendar year to the Manager of Accounting.

186 **Q. Do you support the preparation and submission of these reports as defined**  
187 **by Mr. Knepler?**

188 A. Yes, with only minor modification. I recommend that the three reports actually  
189 be combined into a single report and that Mr. Knepler consider extending the  
190 deadline of such annual report to April 30 rather than April 1. It is more efficient  
191 to combine the three annual reports into a single submission rather than creating  
192 three separate documents for each Ameren Company. All the desired information  
193 will be contained in a single document for each utility. The extension of time to  
194 April 30 should accommodate our internal processes to assemble the required  
195 information and complete the audit for each Ameren Company. The report would  
196 be submitted to the to the Commission's Director of the Energy Division, Director  
197 of the Financial Analysis and to the Manager of Accounting. I caution parties that  
198 it may be appropriate from time to time that specific information contained in the  
199 annual reports may be considered highly confidential and will require confidential  
200 treatment by Staff.

201 The Ameren Companies agree with Mr. Knepler that an annual internal  
202 audit would ensure the Ameren Companies are self-monitoring to ensure full

203 recovery of energy supply related costs, no more and no less, and to provide the  
204 ICC with assurance that the Ameren Companies are examining internal practices  
205 on an annual basis. Finally, I accept Mr. Knepler's offer to work jointly on  
206 mutually acceptable tariff language defining these reports in Rider MV prior to  
207 our compliance tariff filing, after the Commission's Order in this proceeding.

208 **Q. Staff witness Struck proposes changes to the tariff language of Original Sheet**  
209 **No. 27.048 of each Ameren Company's Rider MV, to explicitly list all of the**  
210 **adjustments and adders that are contemplated to be made to the BGS prices**  
211 **resulting from the translation prism as well as explicit language regarding**  
212 **the applicability of the DSSAC charge to DS-4 customers taking RES supply.**  
213 **Do you accept his proposed tariff language?**

214 A. Yes.

215 **Q. Staff witness Harden recommends that the Ameren Companies attach to**  
216 **proposed Rider MV an example of the Retail Supply Charge Informational**  
217 **Filing form. Do you have a response?**

218 A. Yes. The informational filing would consist of the data in the form shown on  
219 Appendix A to Rider MV as sponsored by me in the initial filing.

220 **Q. Staff witness Harden also proposes that the Ameren Companies adopt her**  
221 **standard Index for Rider MV. What is your response?**

222 A. I agree to accept Ms. Harden's standardized index. Nonetheless, the Ameren  
223 Companies may seek to change the index from time to time as the circumstances  
224 so warrant.

225 **Q. Staff witness Selvaggio requests that the account numbers used to book**  
226 **power purchases from the auction as well as any contingency purchases, and**  
227 **for the revenue that is being netted against the expenses, be identified. Can**  
228 **you respond?**

229 A. Yes. Though I am not an accountant, I understand the Ameren Companies will  
230 book power purchases, whether from the auction or contingency purchases in

231 FERC major account number 555 for Purchased Power Expense, using minor  
 232 account numbers to identify each supplier. Revenues collected from riders may  
 233 be recorded in the following revenue accounts with tracking minors:

Revenues:
440 – Residential Sales
442 – Commercial & Industrial Sales
444 – Public Street & Highway Lighting
445 – Other Sales to Public Authorities
446 – Sales to Railroads& Railways
448 – Interdepartmental Sales
456 – Other Electric Revenues
419 – Interest & Dividend Income

234

235 **ICC PROCESSES**

236 **Q. Mr. Collins on behalf of the IIEC recommends that there be a formal ICC**  
 237 **proceeding prior to each auction in order to ensure appropriate oversight of**  
 238 **the auction process, to review the auction design and the auction rules rather**  
 239 **than just relying on informal workshops for discussing future improvements**  
 240 **of the auction process. Do you agree?**

241 **A.** No. I have several concerns regarding this proposal. One of the major concerns is  
 242 that auction design and auction rules must be set about five to six months prior to  
 243 the expected auction date. I question the ability to complete a formal docket on  
 244 this subject matter within time to conduct the auction in the targeted time frame. I  
 245 acknowledge between the first round of auctions and the second round of auctions  
 246 there will be a period of more than one year, and it is possible that an ICC docket  
 247 could be conducted within that time frame. However, in subsequent auctions the  
 248 ICC will only have 5-6 months to complete such proceeding in order to be ready  
 249 for the next auction cycle.

250 **Q. Couldn't the outcome or findings of the formal docket be used in the**  
 251 **subsequent auction, that is, the one after the auction that has to be held in the**  
 252 **next five to six months?**

253 A. Possibly, even then I fail to see any demonstrable benefits. If a party believes that  
254 an action item that arose in the informal workshop has not been properly resolved,  
255 there is nothing to prevent it from initiating a complaint or making some other  
256 filing on its own, whenever it chooses. And, if the IIEC proposal is accepted, and  
257 there is now a “formal” docket, there is nothing to prevent any party from filing  
258 its own complaint or filing, separate and apart from the IIEC “formal” action.  
259 Conceivably, there could be dueling or competing dockets covering some or the  
260 same ground, with different schedules, parties, and a mixture of issues .

261 In addition, while the Ameren Companies do not intend to forego positive  
262 changes to the auction process, and can see that in the beginning as the process  
263 unfolds some chance of needed changes, the reality is the process should be one  
264 that remains static. The rules shouldn’t be open to continuous debate, simply for  
265 the sake of debate.

266 I remain unconvinced that a formal ICC process will produce any real  
267 benefits

268 **Q. Mr. Collins also recommends that there be a “sunset provision” for the**  
269 **auction process if, as a result of his proposed annual formal proceeding, the**  
270 **ICC determines the auction process is producing adverse consequences; in**  
271 **this event he says prior contracts would be honored. Should this suggestion**  
272 **be formalized?**

273 A. No. It is my understanding that the ICC already has the necessary authority to  
274 open a docket to investigate whether to abolish, modify, or to continue the auction  
275 process any time it so chooses. Clearly, two things are certain in the event the  
276 auction process is ever terminated; the prior executed contracts would have to be  
277 honored as Mr. Collins admits, and the utilities would still be required to arrange

278 power supply for its consumers. Moreover, this auction approach isn't something  
279 that was invented yesterday. It has a tried and true history of being a successful  
280 procurement strategy. The IIEC have failed to offer any credible support for a  
281 sunset provision. Finally, the IIEC proposal only creates undue certainty and  
282 perceived risk to a process that requires supplier, consumer, and utility  
283 confidence. We want suppliers to have confidence in an Illinois declining clock  
284 auction—a sunset clause only sends the signal that Illinois is an unworkable  
285 environment for suppliers

286 **RENEWABLE ENERGY AND RELATED CONSIDERATIONS**

287 **Q. Mr. Steinhurst is sponsoring testimony on behalf of CUB and proposes the**  
288 **Commission make certain findings regarding renewable energy and energy**  
289 **efficiency. Can you summarize his positions?**

290 **A.** Yes. Regarding renewables, Mr. Steinhurst recommends:

291 “a portion of the basic utility service system energy requirements,  
292 increasing each year, should be procured from renewable resources on a  
293 long-term basis.”

294 He suggests that it might be best to use an RFP process for the renewable supply  
295 contracts, while continuing to use an auction process for the remainder of the  
296 load. However, he also acknowledges that renewables could also be acquired  
297 through the Governor’s Sustainable Energy Plan. Regarding energy efficiency,

298 Mr. Steinhurst states:

299 “the most convenient way to procure energy efficiency resources would  
300 likely be to procure them separately from the BGS power procurement.  
301 The BGS power procurement “product” is already defined in terms of  
302 each winning bidder committing to supply a certain set percentage of the  
303 BGS customer load as it happens to occur. To the extent that efficiency  
304 resources are procured outside of that process, the BGS supply bidders  
305 will simply see a reduced load before the auction takes place.”

306 In either case, he recommends that the Commission should ensure renewables and  
307 energy efficiency are either included as a result of proceedings for the Governor's  
308 Sustainable Energy Plan ("Energy Plan") or directly via this proceeding.

309 **Q. Can you comment on Mr. Steinhurst's proposal's regarding renewables?**

310 A. Yes. I do not generally disagree with Mr. Steinhurst's views regarding the  
311 benefits of entering into long-term contracts for renewable resources. However, I  
312 disagree with his premise that there is a requirement for physical delivery of the  
313 renewable resources to serve the BGS loads. The Ameren Companies have a  
314 different vision of acquiring renewables, which has been presented to the ICC and  
315 other participants, including CUB, in ICC sponsored meetings for implementation  
316 of the Energy Plan for Illinois. The Ameren Companies' presentations can be  
317 found on the ICC's website.

318 **Q. Will you briefly describe how the Ameren Companies' plan to acquire**  
319 **renewables in conjunction with the BGS auctions?**

320 A. Yes. Conditioned upon assurance of full cost recovery, the proposal is to engage  
321 in long-term contracts with renewable generation developers that will allow such  
322 projects to be constructed and financed. The financial community looks favorably  
323 upon long term contracts for renewable generation when evaluating applications  
324 for construction and financing of same. As a result, the Ameren Companies'  
325 proposal promotes the long term viability of renewable generation and is a key  
326 consideration in bringing the greatest benefits of renewable resources to our  
327 customers. Our proposal does not require that the Ameren Companies take  
328 physical delivery of the renewable energy being generated by our contracts, but to  
329 receive green certificates, proof that such generation occurred. Our proposal is to

330 create a “renewables” financial hedge for customers, using a fixed cost for  
331 renewables that is established by the long-term contracts as compared to the  
332 hourly market value for the actual energy generated. As market prices for energy  
333 exceed the cost of renewable energy, customers will see a credit on their bills.  
334 During periods when the market price is less than the cost of renewable energy,  
335 there will be a charge to customers for the renewable program. The charges and  
336 credits will appear on the Delivery Services portion of customer bills, benefiting  
337 customers taking supply either from the Ameren Companies or from a RES.

338 **Q. In the Ameren Companies’ direct case, Mr. Craig Nelson stated that the**  
339 **procurement auction could accommodate a renewables mandate. Have the**  
340 **Ameren Companies changed their proposal?**

341 A. No. In the event the legislature would mandate renewable energy procurement,  
342 such procurement could be required of bidders in the BGS auction. However,  
343 since February, the Ameren Companies have actively participated in ICC  
344 sponsored meetings and have submitted proposals to voluntarily implement  
345 renewable energy and energy efficiency goals and initiatives at the levels  
346 requested in the Energy Plan. Our presentations to the working groups and to the  
347 ICC detail the benefits of keeping the renewables outside of the auction process,  
348 including the fact that the Ameren Companies can make long term commitments  
349 to renewable suppliers in sizable quantities, whereas bidders in the auction  
350 process likely cannot do that because of the generation supply contract terms.

351 **Q. Do you have any further comments regarding energy efficiency?**

352 A. Yes. I agree with Mr. Steinhurst that energy efficiency be procured separately  
353 from the BGS power procurement and that the BGS supply bidders will simply  
354 see the benefits of energy efficiency as reduced load.

355 **Q. What should the Commission do in this proceeding regarding renewable**  
356 **energy and energy efficiency programs?**

357 A. No action by the Commission is necessary in this proceeding given the direction  
358 the Commission is already taking with their Sustainable Energy initiative.

359 **MISCELLANEOUS**

360 **Q. CES witnesses Domagalski and Spilky recommend a new docket where**  
361 **communication materials would be reviewed by the Commission. Is this**  
362 **agreeable to the Ameren Companies?**

363 A. No, it is not. As the CES witnesses readily acknowledge, the Ameren Companies  
364 are IDCs and as such, are bound to the IDC rules contained in 83 Ill. Adm. Code  
365 Part 452. These rules govern, in part, the manner and method by which an IDC  
366 communicates with its customers on a variety of topics. The Ameren Companies  
367 intend to follow these rules and, therefore, there is no need for the docket. Further,  
368 their recommendation is not practical. The utility's interaction with its customers  
369 is a daily event—should the Commission be obligated, on a regular basis, to open  
370 dockets addressing utility communications? I doubt this would be acceptable to  
371 the Commission.

372 **PUBLIC NOTICE**

373 **Q. Do you have any other testimony you would like to provide at this time?**

374 A. Yes. Pursuant to provisions of 83 Ill Adm. Code Section 255.20, the Ameren  
375 Companies provided public notice of its February 28, 2005, filing of tariff sheets  
376 in this proceeding in newspapers of general circulation in the territories served by

377 the Ameren Companies. I am attaching certificates of such publication as  
378 Respondent Exhibit 16.1 to my testimony.

379 **Q. Does this conclude your testimony?**

380 **A. Yes, it does.**