

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

CENTRAL ILLINOIS LIGHT COMPANY)	
D/B/A Ameren/CILCO)	
)	No. 05-0160
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	
)	
CENTRAL ILLIONOIS PUBLIC SERVICE COMPANY)	
d/b/a AmerenCIPS)	
)	No. 05-0161
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	
)	
ILLINOIS POWER COMPANY)	
d/b/a AmerenIP)	
)	No. 05-0162
Proposal to implement a competitive procurement)	
Process by establishing Rider BGS, Rider BGS-L,)	
Rider RTP, Rider RTP-L, Rider D, and Rider MV)	

**MOTION OF THE CITIZENS UTILITY BOARD
FOR LEAVE TO FILE A LATE-FILED EXHIBIT**

Pursuant to Section 200.190 of the Rules of Practice of the Illinois Commerce Commission (“ICC” or “Commission”), the Citizens Utility Board (“CUB”) respectfully requests leave to file a late-filed exhibit in the above-captioned proceeding. 83 Ill. Admin. Code § 200.190. In support of this Motion, CUB state as follows:

1. On June 15, 2005, CUB submitted the pre-filed direct testimony of William Steinhurst. Attached to that testimony was CUB/CCSAO Exhibit 2.2, a study conducted by Synapse Energy Economics (“Synapse”) entitled “Valuation of Exelon Illinois

Nuclear Plant Margins,” which contains extensive data and analysis on energy prices, revenues, and margins in the northern Illinois region.

2. On September 1, 2005, Synapse provided to CUB a supplemental memorandum to the original study, titled “Energy Prices and Revenues in Northern Illinois.” This memorandum discusses recent energy price changes and updates the information contained in CUB/CCSAO Exhibit 2.2.

3. The information contained in CUB/CCSAO Exhibit 2.2A is highly relevant to the Commission’s determination in this docket, as it contains updated price and revenue information, which is central to the key issues in this case.

WHEREFORE, for all of the foregoing reasons, CUB respectfully requests that the ALJ grant this Motion for Leave to File a Late-Filed Exhibit.

Respectfully submitted,

CITIZENS UTILITY BOARD

By: 
Robert J. Kelter
Director of Litigation
Lawrence A. Rosen
Citizens Utility Board
208 S. LaSalle, Suite 1760
Chicago, IL 60604
(312) 263-4282
(312) 263-4329 fax
robertkelter@citizensutilityboard.org

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