STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Central Illinois Light Company	**)**	
d/b/a AmerenCILCO,	**)**	**No. 06-0070**
	)	
Central Illinois Public Service Company	**)**	**No. 06-0071**
d/b/a AmerenCIPS	**)**	
	)	
Illinois Power Company d/b/a AmerenIP	**)**	**No. 06-0072**
	)	
Proposed general increase in rates	**)**	**(Consol.)**
for delivery service.	**)**	

DIRECT TESTIMONY OF

JENNIFER WITT

PEOPLES ENERGY SERVICES CORPORATION

ON BEHALF OF:

CONSTELLATION NEWENERGY, INC.
PEOPLES ENERGY SERVICES CORPORATION

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I. INTRODUCTION AND SUMMARY OF ISSUES

Q. Ms. Witt, please provide your name, employment, address and background relevant to your appearance as a witness in this proceeding.

A. My name is Jennifer Witt and I am employed by Peoples Energy Services Corporation ("PES"), an intervening party in this proceeding. PES is located at 130 East Randolph Drive, Suite 2300, Chicago, Illinois 60601. I have been employed by PES since November 2003 and I am primarily responsible for managing the company's regulatory matters and new market development for both gas and electricity. Prior to joining PES, I worked for over nine years as a consultant advising energy clients regarding competitive market assessments, strategic planning, market segmentation, and financial valuation. I hold a B.S. in finance from Michigan State University.

Q. On whose behalf are you testifying?

A. I am testifying jointly on behalf of Constellation NewEnergy, Inc. ("CNE" or "NewEnergy") and PES. The positions set out in this Direct Testimony represent the joint positions of NewEnergy and PES collectively, but do not necessarily represent the positions of the individual companies.

Q. What is the purpose of your testimony in the instant proceeding?

A. NewEnergy and PES have actively participated in the Illinois retail electric market since the market first opened to competition in October of 1999. During the past six (6) years we have gained a wealth of experience in dealing with the

distinct operational and interface issues that exist as a result of the introduction of customer choice, most notably in the Commonwealth Edison Company ("ComEd") service territory. We also have experience dealing with other utilities and other jurisdictions throughout the country. The instant consolidated delivery services tariff ("DST") proceedings provide the Commission with an opportunity to correct the current operational and business processes and practices of AmerenCIPS, AmerenCILCO, and AmerenIP (collectively, "Ameren" or "the Companies") that have acted to impede the development of customer choice in the Ameren service territories. To be sure, the end of the Transition Period should also be the end of institutional obstacles, intended on inadvertent, that frustrate customer choice. Accordingly, we offer several rather basic and straightforward recommendations, based upon our experiences in restructured markets, for improving the operational aspects of the interactions between Ameren, customers and retail electric suppliers ("RESs").

Q. Please explain why these revisions are necessary and appropriate at this time.

A. The operational and interface issues that we have identified have real consequences that ultimately impact our ability to provide services to retail electric customers and as well as our costs. Indeed, due to the nature of the "tri-party" interactions that occur in the marketplace, customers, Ameren, and RESs all will benefit from the adoption of the recommendations put forth by NewEnergy and PES.

Q. Please discuss the type of issues that you will be addressing in your testimony.

A. We address four (4) broad but important topic areas:

1. General Account Agency ("GAA" or "Agent");

2. Data Exchange - Electronic Data Interchange ("EDI");

3. Data Exchange - Proposed Improvements to Ameren's website; and

4. Ameren's Communication with Customers and RESs.

Q. Please summarize your recommendations for improvements to the four topic areas discussed above.

A. The Commission should adopt a policy that reduces bureaucracy and red tape embodied in Ameren's DSTs, business practices, RES Handbooks, and/or operational guidelines. Specifically, NewEnergy and PES recommend the following improvements to Ameren's business processes, provision of information and data, and other related customer service functions in order to better facilitate the continuing development of customer choice:

<u>General Account Agency</u>

NewEnergy and PES recommend that upon a customer's request, Ameren should be required to split a customer's bill and create separate invoices for electric and gas service.

Data Exchange - Electronic Data Interchange ("EDI")

Ameren should implement a number of practical business solutions and improvements to EDI transactions. Specifically, the processes and procedures that Ameren employs for RES customers should apply to customers that elect Ameren post-2006 bundled service (i.e, BGS-FP, BGS-LFP, BGS-RTP, BGS-LRTP). However, significant improvements are needed before the full value of EDI can be realized:

1. The Ameren DUNS number should be applied in a uniform manner across the entire EDI transaction set for each Ameren operating company. Alternatively, the individual Ameren companies should use the Ameren DUNS number for all EDI transactions.

2. The EDI processes and procedures, including but not limited to 814, 867, 820, and 810 data, that are currently employed for customers on RES supply should also be applied to customers taking service under BGS-FP, BGS-LFP, BGS-RTP, and BGS-LRTP.

3. With respect to customer enrollments, customer account drops, and other changes associated with the "814" EDI transactions, Ameren should incorporate the following:

    a. Ameren should implement EDI 814-C regarding meter numbers;

    b. All active meters should be identified with an 814 enrollment response; and

    c. All drop information (including retroactive drops) should be provided to RESs electronically, in real time

Data Exchange - Proposed Improvements to Ameren's Website

In order to appropriately effectuate processes agreed to by Ameren in its consolidated procurement case and in the instant proceeding, Ameren needs to improve its website and data availability so RESs and customers can easily obtain

information during the remainder of the transition period and in the post 2006 environment.

Specific changes that Ameren should make to its website include:

1. **New Rate and Eligibility Information**, including:
   a. Current and future rate/supply type;
   b. Current and future customer supply group/customer delivery class;
   c. Respective Ameren utility; and
   d. DASR eligibility date.

2. **Expanded Historical Data.**

3. **Consistent data for all customers, both RES and utility.**

<u>Ameren Communications With Customers and RESs</u>

To better facilitate communications between Ameren and customers as well as Ameren and RESs, Ameren should:

1. Establish an Electronic Bulletin Board as a centralized means for customers and RESs to interact with Ameren, to ensure consistent, timely and accurate information is provided to all market participants; and

2. Dedicate a single point on contact for RESs at the Ameren Transmission Services Business Center to address customer issues raised by RESs.

Q. If Ameren adopts these recommendations, how would that benefit customers, RESs, and the continued development of the marketplace?

A. By doing so, Ameren would greatly reduce the bureaucratic obstacles that frustrate the ability of RESs to provide service to Ameren's delivery services customers. Until these bureaucratic processes are revised, Ameren's post-2006 supply options will not fully comport with the basic tenets of the Memorandum of

Understanding ("MOU"), which is addressed in the Direct Testimony of CNE/PES witness Dr. Philip R. O'Connor.

II. GENERAL ACCOUNT AGENCY ISSUES

Q. Please explain Ameren's current designation of account agent policy.

A. The main purpose of this policy is to provide customers the ability to designate an agent for the purpose of obtaining certain types of account or billing information and arranging and managing tariff services on their behalf. For example, customers can authorize agents to obtain bills and remit payments. In order to inform Ameren of this authority and memorialize their relationship with the customer, an agent submits to Ameren an Account Agent Designation Statement signed by the customer.

Q. Please explain the problems associated with becoming an agent in the Ameren service territory.

A. Ameren currently creates separate account numbers for electric customers who elect to take competitive retail natural gas transportation service, and thus creates two separate bills for those customers, one for electric service and one for gas service. However, Ameren has argued for several years now that it cannot create a separate electric bill for a customer that does not take gas transportation service, mainly due to alleged system constraints. If a RES wants to become the billing agent for electric service only, it is required to obtain both the gas and electric

bills for customers not electing gas transportation service. Ameren won't even provide separate bills upon direct customer request.

Q. Is there any way a RES can obtain billing data for a customer's electric service only?

A. Yes. A RES can obtain billing data for a customer's electric service only by electing Ameren's Single Billing Option ("SBO").

Q. Does the ability of a RES to receive a customer's electric billing information via the SBO option address the customer issue of not being able to designate separate billing agents for electric and gas service?

A. No. Customers request bill agency service for a variety of reasons. For example, a customer may want a third party to manage their electric service account by making tariff decisions. Similarly, consider a situation where the family of an elderly customer desires to pay utility bills and split the services among family members. Under Ameren's antiquated and restrictive agency policy, the family of the elderly customer in this scenario would have no choice but to designate only one bill agent for both services. Ameren's current agency policy and associated billing processes limit a customer's choice and ability to effectively manage its energy services.

Q. What is your recommendation on this issue?

A. Ameren should be required to split customers' bills between gas and electric service upon customer request. Other dual fuel utilities serving customers in Illinois, such as MidAmerican Energy Company, allow customers to split their account upon request. Appropriate modifications should be made to Ameren's current business processes to allow customers control over the services they receive from their public utility.

III. DATA EXCHANGE – PROPOSALS TO FACILITATE THE PROVISION OF MORE TIMELY, ACCURATE, AND COMPLETE INFORMATION

Q. Please explain how RESs obtain important information from Ameren that impacts your ability to effectively manage the day-to-day operations of your business?

A. EDI is relied upon by Ameren and RESs to execute most daily business transactions. The information exchanged between Ameren and RESs includes customer enrollments and drops, historical usage summary data, metering information, meter status changes, and monthly meter reads and invoices. To ensure that Ameren can exchange information easily with RES, both computer systems must be able to communicate with each other. Once the information has been converted to a common format, it can easily be exchanged. Using EDI standards, which contain rules for data formatting, helps to ensure successful exchanges of electronic data.

As a result, we receive most of the important day-to-day operational information from Ameren in the form of an EDI file or transaction. Among other things, this EDI file or transaction includes information such as customer enrollments, customer drops, name changes, and meter changes.

Q. Please explain what corrections should be made to the way in which Ameren interacts with RESs via EDI.

A. As discussed below, there are a number of corrections and practical improvements to processes related to EDI transactions that Ameren should embrace as we enter the post-transition era. As an initial matter, the EDI processes and procedures that Ameren employs for RES customers should be implemented in a uniform and consistent manner for all Ameren companies. The principle of uniformity and consistency should apply to all EDI transactions and across all customers that elect Ameren post-2006 bundled service (*i.e.*, BGS-FP, BGS-LFP, BGS-RTP, and BGS-LRTP).

A. UTILIZING EDI FOR ENROLLMENT OF BUNDLED CUSTOMERS

Q. What specific recommendations do you have for the Commission regarding how Ameren's enrollment and switching processes should be revised in the post-transition period?

A. The process for enrolling customers on proposed Rider BGS-F, BGS-LFP, BGS-RTP and BGS-LRTP should utilize the EDI framework already in place for RES-supplied customers. Credit is due to Ameren, as its use of EDI has contributed to

the success of the competitive energy market in Illinois. Indeed, the market could not have developed if everything were done via "hard copy" paper transactions. However, the use of EDI should not be artificially limited to only those customers who take service from a RES.

Q. What are the benefits of using the EDI framework for enrolling Rider BGS customers?

A. The primary benefits are cost savings and increased customer satisfaction, in addition to mitigating the operational risk discussed above. More uniform processes and procedures for enrolling customers, regardless of the supply option chosen by customers will result in cost savings. Allowing RESs to process all customer enrollments using the EDI framework will help Ameren realize gains in efficiency.

B. UNIFORMITY OF DUNS NUMBERS ACROSS EDI TRANSACTION SETS

Q. Please describe a DUNS Number and how it affects EDI transactions.

A. As discussed above, due to its wide spread use, EDI transactions must have an attribute which identifies the utility company who is sending and receiving the EDI transactions. The industry traditionally has used the Data Universal Numbering System or "DUNS" number assigned by Dun and Bradstreet. The DUNS number is a nine-digit number assigned and maintained by Dun and Bradstreet to identify businesses. Each Ameren operating company has an assigned DUNS number, as does their holding company.

Q. Please describe the problem that has been observed with respect to the use of the DUNS number and associated EDI transactions.

A. Ameren is inconsistent in its use of the DUNS numbers that identify Ameren and its individual operating companies. Absent consistent use of the DUNS number, efficiently processing EDI transactions is not possible, affecting the opportunities of RESs to provide options to Ameren customers. That is, Ameren makes it very difficult to do business on any scale since each transaction has to be manually modified in order to be processed efficiently.

Q. Can you provide some general examples of inconsistent processes?

A. Yes. The EDI 814 enrollments are sent to Ameren with an Ameren DUNS number. When an enrollment response is received from Ameren, the response contains the same Ameren DUNS number, but with appended text. To process this in a manner similar to other EDI transactions received from other utilities, the text must be removed before being processed by the RES.

Q. Are there other examples?

A. Yes. The EDI 867 transaction, which represents usage data, is received with only the DUNS number of the individual Ameren operating company (i.e. different for CIPS, CILCO, and IP). This is fine if, in fact, the individual companies are the only entities the RES should be prepared to communicate with via EDI. However, invoices and payments, EDI 810 and 820 respectively, use *both* the

Ameren DUNS number *and* those of the individual operating companies, making it more difficult for RESs to process these transactions.

Q. What is your solution to correct this problem?

A. Use of the DUNS number should be consistent throughout the Ameren companies. In light of the growth Ameren has experienced over the years due to its acquisition of other Illinois electric utilities, Ameren should clearly communicate to all RESs so that the DUNS number and related procedures are applied in a uniform manner across the entire EDI transaction set for each Ameren operating company. Alternatively, the individual Ameren companies should use the Ameren DUNS number for all EDI transactions.

C. AMEREN SHOULD IMPLEMENT EDI 814-C REGARDING METER NUMBERS

Q. What is the EDI 814-C transaction set used for?

A. The standard EDI 814-C transaction notifies a RES of changes to customer account numbers, billing addresses and meter numbers.

Q. Does Ameren currently support the 814-C to notify RESs of changes in meter number?

A. No. According to Ameren's response to CNEI Data Request No. 4.8, Ameren does not currently support the 814-C for changes in meter number, but plans to implement the capability prior to January 1, 2007. (For the Commission's

convenience, a copy of Ameren's response to data request CNEI-4.8 is attached hereto and made a part hereof as CNE/PES Ex. 2.1.)

Q. Please explain your concern regarding Ameren's response regarding implementation of the 814-C for meter changes?

A. While it is somewhat confusing why Ameren is not currently supporting this transaction set given Ameren's requirement to follow the statewide standard for EDI transactions, commitment to implementing this transaction set prior to January 1, 2007 is important. We would, however, suggest that Ameren implement this transaction set as soon as possible, given that testing will presumably need to be done between RESs and Ameren. Given all the other significant changes that will take place between now and the end of the year, it behooves Ameren to implement this change as soon as possible, preferably before the auction, so that Ameren and RESs can focus on other significant changes that will take place both during and after the auction and post January 2, 2007.

D. EDI 814 ENROLLMENT RESPONSES SHOULD INCLUDE ACTIVE METERS

Q. What is the EDI 814 response transaction set used for?

A. The EDI 814 response transaction notifies a RES of whether or not an enrollment request was received and accepted by the utility.

Q. Why would a RES want to know the active meters on an account at the time of enrollment?

A. Simply put, having this information at the time of enrollment allows RESs to provide better service and results in a more pleasant experience for customers, as potential problems can be proactively managed before the customer receives the first bill. It also produces greater efficiency for the RES, lowering the overall cost to provide service.

IV. DATA EXCHANGE – PROPOSED IMPROVEMENTS TO AMEREN'S WEBSITE

Q. How is Ameren's website currently used by customers and RESs?

A. Customers and RESs use Ameren's website to access account, meter usage and billing data. Additionally, RESs use Ameren's website to access Ameren's standardized forms.

Q. What areas of Ameren's website do you recommend be improved?

A. Our recommendations fall into three (3) categories: First, some changes should be made as soon as practicable to enhance the data provided to customers and RESs, mainly due to the impending post-transition period. That is, there are certain changes that are required in order to facilitate the processes agreed to by Ameren in its consolidated procurement case (ICC Docket No. 05-0160, 05-0161, 05-0162 (cons.)) as well as those that are issue in the instant proceeding. Given the elimination of legacy bundled rates, new bundled rates, and other new tariffs, combined with the switching rules applicable to those rates and tariffs, it will be

necessary for Ameren's website to provide a translation of the existing schedule of rates.

Second, RESs need access to additional and more consistent data so they can provide customers even more product and service options, which is especially relevant as we near the end of the transition period. Given the complex switching rules proposed for the post-transition period and the proposed shortened enrollment window, it is imperative that users of Ameren's website be informed of an account's DASR eligibility date as quickly as possible. For example, information regarding current and future rate and supply type, supply group and delivery class information, should be posted on Ameren's website for all current customers.

Third, Ameren's website needs to be altered so that there exists one place both customers and RESs can go to obtain customer related information, regardless of a customer's supply type or operating company. Today, customer related information resides on Ameren's website in several different areas and often in different formats. For example, AmerenIP customer data can be found in multiple locations depending on the customer supply type. Additionally, despite its title, the AmerenIP Customer TC Information link provides more information than just TC (transition charge) data. This type of inconsistency needs to be eliminated so both customers and RESs can easily obtain informational needs. Ameren should

look to ComEd's PowerPath website as a good example of how to centralize relevant customer choice related data.

These specific recommendations are described in greater detail below.

A. <u>NEW RATE AND ELIGIBILITY INFORMATION</u>

Q. Please explain what information should be included on Ameren's website regarding its new rates and eligibility rules?

A. The elimination of legacy bundled rates and simultaneous introduction of new tariffs for bundled service and delivery service rates, in tandem with the attendant switching rules applicable to those rates and tariffs, necessitates that Ameren modify and/or supplement their website so that customers and RESs easily may obtain the following information:

1. **Current and future rate/supply type** (*e.g.* bundled service rate SC 11 for AmerenIP, PPO, ISS or pre-2006 RES supply; and BGS-FP, BGS-LFP, BGS-RTP, BGS-LRTP, or post-2006 RES supply);
2. **Current and future customer delivery class and supply group** (*e.g.*, AmerenIP SC 110 DS-1, DS-2, DS-3 etc. pre-2006 and Rate DS-1, DS-2, DS-3, and BGS-1, BGS-2 and BGS-3, etc. post-2006);
3. **Respective Ameren utility**. Ameren should include as a component of customer information listed on its website, classification of customers by Ameren operating company: IP, CIPS, or CILCO. Given that distribution rates and loss factors will likely remain different across operating companies, customers and RESs will need to unequivocally conclude which rates and factors apply to prospective customers; and
4. **DASR eligibility date** – Ameren should include a date field on their website for specific customer data so that customers and RESs may easily query minimum stay requirements for customers that have

returned to bundled service. Currently, customers and RES' only method to obtain this information is from an Ameren Transmission Services Business Center RES contact who may not even have the most current information. Given Ameren's switching rules, customers' status (with respect to minimum-stay requirements) will take on a far greater significance in the post-transition environment. Accordingly, Ameren must ensure that these bureaucratic, overly cumbersome and time-consuming tasks are as efficient and user-friendly so that customers and RESs are provided accurate and timely information on which to determine their best supply option.

B. PROVISION OF ADDITIONAL AND MORE CONSISTENT DATA

Q. Please describe the need for changes that will yield additional and more consistent data and information for both RESs and customers?

A. Ameren's website and business practices should be revised to provide additional historical data as well as more consistent data for RESs and other utility customers.

Q. What historical usage data is presently available on the Ameren website?

A. Yes. According to Ameren, customers and RESs can access and download 12 months worth of usage information via Ameren's website, free of charge. (For the Commission's convenience, a copy of Ameren's response to data request CNEI-1 is attached hereto and made a part hereof as CNE/PES Ex. 2.2.)

Q. Does Ameren allow a RES to obtain more than 12 months of historical usage data?

A. No. According to Ameren, it does not allow a RES to obtain more than twelve months worth of historic usage data from Ameren's website. (For the

Commission's convenience, a copy of Ameren's response to data request CNEI-18 is attached hereto and made a part hereof as CNE/PES Ex. 2.2.) Historical data beyond 12 months may be obtained by contacting Ameren's Customer Contact Center, but Ameren will charge a fee for providing this expanded data based on quantity, type and availability of the data requested.

Q. Does ComEd allow a RES to obtain more than 12 months of historical usage data?

A. Yes. RESs and customers can obtain up to 24 months of historical usage information via ComEd's PowerPath website, free of charge.

Q. Why is 24 months of historical data necessary for RESs and beneficial for customers?

A. It is difficult for RESs to determine customer usage patterns without more than one year of data. For example, a dip in usage during the summer period could be a one-time only occurrence, a recurring trend, or it could mean that a customer has changed their business meaning that all future usage will decrease. It is difficult to ascertain useful information from such a small sample of data. In order for RESs to be allowed to fully meets the needs of all customers, RESs need access to this additional usage information.

Q. What is your recommendation on this issue?

A. Ameren should provide up to 24 months of data to both customers and RESs, free of charge. RESs and customers in the Ameren service territory should have the same opportunity to receive the same quality of information for the same cost as that being provided to RESs and customers in the ComEd service territory.

Q. Does Ameren currently provide the same customer data to RESs and customers, regardless of a customer's supply type?

A. No. The type of customer related information provided by Ameren varies depending on the supply type of the account. For example, Ameren does not always provide customer TOU data and on and off peak split information. That is, when an account is direct served by a RES, Ameren's website does not display on/off peak splits. However, if the account is supplied by the PPO the on/off peak splits are displayed.

Q. Please explain why you recommend that Ameren provide TOU data and on and off-peak splits for RES-supplied customers?

A. It is true that during the time that the RES is directly serving the account, the RES may possess on/off peak splits through its own billing mechanism. However, the information collected by that RES obviously is not displayed on Ameren's website; therefore, other RESs would not be privy to such information. It does not make sense to withhold the posting of this important, relevant information that would allow RESs to better serve customers.

Q. How would the provision of this data and information better allow RESs to meet the needs of retail customers?

A. Since any internal report of the on/off peak splits would be proprietary to the RES, another competing RES would not have access to this information. By not having access to this information to give price quotes, the competing RESs pricing becomes less accurate and potentially harmful to the overall economics of both the customer and the RES. Basically, having Ameren post the on/off peak splits on its website would be beneficial for retail competition overall, and would foster more accurate pricing.

Q. Did ComEd agree to provide this type of data to RESs and customers?

A. Yes, in its delivery services proceeding (ICC Docket No. 05-0159), ComEd agreed to provide RESs on and off peak data for all customers, regardless of the customer's service of supply.

V. AMEREN COMMUNICATIONS WITH CUSTOMERS AND RESS

Q. Does Ameren currently have adequate processes in place to ensure consistent and effective communication with customers and RESs?

A. No.

Q. Why are Ameren's current processes inadequate?

A. Communication from Ameren is not always consistent or timely. In fact, if you contact different areas within Ameren with the same question regarding Ameren's interpretation and application of certain tariff provisions, you may get different answers. If one RES or customer asks the question, Ameren might provide one answer, but there is currently no mechanism to ensure that the next RES or customer that asks the same question will receive the same answer. As a result, not all customers are on equal footing when they are evaluating their options. This is essentially a "quality control" issue. Given the complexity of Ameren's current and proposed tariffs, and its switching rules and eligibility requirements, it is critical that Ameren provide consistent and accurate information to customers and RESs.

Q. Do you have any suggestions on how Ameren can improve its communication processes?

A. Yes. There are at least three (3) specific ways in which Ameren can better ensure its communications are consistent and effective. First, Ameren should use an "electronic bulletin board." Second, Ameren should assign each RES an individual contact within Ameren's Transmission Services Business Center (formerly known as the ARES Business Center). Third, Ameren should assign a specific customer service representative to each RES.

Q. Please explain how an electronic bulletin board would work.

A. Ameren should develop an area on its website where communications to customers and RESs would be posted, along with a "Questions and Answers" area, where questions posed to Ameren by customers or RESs could be posted along with Ameren's response. Using this process where the same information is accessible by all interested parties would ensure Ameren is accountable for providing consistent and timely information. This is comparable to the Frequently Asked Questions ("FAQ") sections found on many websites.

Q. What type of information would be posted on the electronic bulletin board?

A. Ameren would be the ultimate "gate-keeper" of the information that is posted, as it would reside on their website. As such, Ameren would also ultimately determine what information is posted. The currently existing Ameren Transmission Services Business Center ("TSBC") would be the logical area within Ameren to manage the information. It would seem to be in Ameren's best interest to post all questions and answers that would have widespread application (*i.e.* information that multiple customers or RESs would find useful). That way, if the questions are asked again by another customer or RES, all areas within Ameren would have a reference tool to ensure they are providing consistent answers. This mechanism should also be used by Ameren to ensure the proper areas within the Company have reviewed and agree with the response prior to its posting. The bulletin board also could be used to notify customers and RESs of information such as tariff filings, system issues, or new meter read schedules.

Q. Is there any risk that confidential information will be disclosed?

A. No. Ameren could review information prior to posting, such that any confidential or inappropriate information is not posted on the public site. While there may be requests for confidential information (*e.g.* account-specific information) Ameren simply could respond in those situations that the interested party should contact their account representative for more information. That way information related to any specific account would not be disclosed on the bulletin board. Also, the identity of the requesting party would not be disclosed.

Q. Who would have access to this electronic bulletin board?

A. Since we do not envision that Ameren would post anything that is confidential, there is no need to limit access.

Q. What is Ameren's process for assigning RESs a contact within Ameren that can handle RES-related issues?

A. Currently, Ameren's TSBC is the contact for all RES-related, Meter Data Management Agreement and transmission billing issues. If a RES has a particular question that falls into one of the three aforementioned categories, they call the 1-800 number for the group and deal with whichever one of the three individuals that staff Ameren's TSBC who happens to answer the phone.

Q. Do you have any issues with Ameren's current process?

A. Yes. While it is helpful to have a dedicated group, many times RESs have to repeat issues to multiple people within the group. This process also often results in RESs being transferred to different people within Ameren, often outside of the TSBC, to find the proper resource. Additionally, the TSBC does not handle PPO-related issues; as a result, multiple contacts within often are necessary Ameren before PPO-related questions are resolved.

Q. Please explain why Ameren should assign each RES an individual contact within Ameren's TSBC.

A. Based on our experience working in other territories, it is much more efficient for a RES to have one primary contact. If one person within Ameren's TSBC were assigned to each RES, there would be one point of contact that would understand the RES's specific issues and track an issue from initiation to resolution. This Ameren representative could then also contact the proper Ameren resources for any given situation so that the RES would not have to contact multiple parties.

Q. Please explain why having a single Ameren customer service representative assigned to each RES would improve communication.

A. This customer service resource would allow all customers to receive more timely and consistent customer service. Customers often have questions regarding their invoice, electricity usage, retail options or other items related to their electric service. While customers can contact their RES or Ameren's customer service,

given the complex nature of the switching rules and timing of enrollment, often questions cannot be answered solely by their RES or solely by Ameren due to varying contractual arrangements or utility tariffs and requirements. Customers also often are under critical time factors where timely answers make the difference as to whether they make or miss a switching deadline for any given month or year.

If each RES had a consistent and single contact who is part of Ameren's Customer Service team, customer-specific issues and questions could be handled in a timely and consistent manner. The Ameren customer service team would be made aware of the types of issues brought up by RES-supplied customers and would be trained accordingly.

Q. If Ameren were to agree to assign a current TBSC representative to each RES, could this representative handle a customer service related role?

A. No. Even if Ameren were to agree to assign an individual TBSC representative to each RES, TBSC representatives are not directly accountable for customer service issues, such as providing timely and accurate information to customers. Instead, customers' only resource is to contact a Ameren's customer service representative via Ameren's 800 number. RESs are uniquely positioned, as a result of our experiences dealing with large groups of customers who are investigating and/or taking competitive supply, to provide detailed information to Ameren regarding

customer issues that result in frequent questions. Ameren should facilitate this communication between Ameren and RESs.

VI. CONCLUSION

Q. Please summarize your recommendations to the Commission.

A. The Commission should direct Ameren to adopt the recommendations of NewEnergy and PES with regard to the operational and interface issues that we have identified. Specifically, we recommend: (1) modifications to GAA / billing agent authority; (2) practical business solutions to EDI transactions; (3) modifications to the Ameren's website; and (4) specific means of improving communications between Ameren and customers. Based on our experience, we believe that Ameren's adoption of these basic and straightforward recommendations can improve the operational aspects of the interactions between RESs, Ameren and customers. This will lead to greater efficiencies for all stakeholders and ultimately have a positive effect on the ability of the Commission, Ameren and RESs to bring the benefits of competition to retail customers.

Q. Does this conclude your testimony?

A. Yes.