

ILLINOIS COMMERCE COMMISSION

DOCKET NOS. 06-0070, 06-0071 and 06-0072 (CONSOLIDATED)

REBUTTAL TESTIMONY

OF

KEITH P. HOCK

Submitted On Behalf

Of

**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**

May 26, 2006

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OF

KEITH P. HOCK

Q. Please state your name and business address.

A. My name is Keith P. Hock. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103.

Q. What are your job duties and responsibilities?

A. I am employed by Ameren Services Company (Ameren Services or Ameren) as Managing Supervisor of the Transmission Services Business Center (TSBC). My duties as the Managing Supervisor of the TSBC include developing and maintaining customer relationships with alternate retail electric suppliers, maintaining and operating the various systems used for billing for transmission services provided by the Midwest Independent Transmission System Operator (MISO), providing Meter Data Management Agent (MDMA) services for Ameren affiliates as well as non-affiliated entities, and participating in strategic planning and tariff development regarding retail open access.

Q. What is the purpose of your rebuttal testimony?

A. The purpose of my testimony is to respond to the testimony of Peoples Energy Services Corporation witness Jennifer Witt in the specific areas of General Account Agency, proposed improvements to Ameren's website and Ameren communications with customers and RES. Finally, I will respond to the

24 testimony of Constellation NewEnergy, Inc. witness John L. Domagalski on the
25 issue of a customer's ability to return to the Single Billing Option (SBO).

26 **Q. What recommendations does Ms. Witt make regarding General Account**
27 **Agency?**

28 A. At lines 69-71 of her testimony, Ms. Witt recommends Ameren should be
29 required to split a customer's bill and create separate invoices for electric and gas
30 service upon a customer's request.

31 **Q. Do you agree with this recommendation?**

32 A. Ameren already does, upon the customer's request, split the bill and create
33 separate invoices for electric and gas service. However, Ms Witt's
34 recommendation does not clearly distinguish between situations where the RES is
35 truly acting as a RES and when the RES is simply acting as an Agent and not as a
36 RES at all. Ms. Witt's comments could lead us to think that a RES and an Agent
37 are one in the same when in fact they are different. A RES is a Retail Electric
38 Supplier providing electric supply based on a customer's request while an Agent
39 is someone acting in a consultant capacity that the customer allows to act on its
40 behalf with respect to their account (with the exception of starting or stopping
41 service). In many cases a customer will employ an Agent to act upon its behalf
42 for their entire account, which may include multiple service types (such as gas
43 and electric). A customer's RES may or may not be authorized by a customer to
44 be its Agent on the customer's account. Likewise an Agent may or may not be
45 authorized by the customer to be make payments or make actual decisions on the
46 customer's behalf.

47 Ameren views an Agent as someone acting in a commercial capacity that the
48 customer allows to act on its behalf with respect to their account (with the
49 exception of starting or stopping service). A special type of Agent is a "Billing
50 Agent". A Billing Agent has all of the access of a regular Agent. In addition, a
51 Billing Agent receives the customer's bill and pays it on their behalf. In the
52 AmerenIP service area, Billing Agents must meet certain criteria before being
53 approved to act as Billing Agents. Ameren has over 8,900 accounts with Agent
54 type relationships. On those accounts there are approximately 10,000 Agents.
55 Many accounts have more than one Agent determined by the customer.

56 **Q. How can the RES receive only the electric portion of the customer's bill if the**
57 **RES chooses not to be the customer's Agent?**

58 A. Designating their RES to be the Agent for their billing account is a very easy
59 thing for a customer to accomplish. However, if the RES chooses not to act in the
60 capacity of a customer's Agent, then the RES can still receive the "electric only"
61 portion of the customer's bill using the SBO. The SBO alternative is available to
62 all RES that are registered to serve customers in any of the Ameren Company
63 service territories.

64 **Q. Ms. Witt asserts there are problems associated with becoming an Agent in**
65 **the Ameren service territory. Do you agree with her comments?**

66 A. Ms. Witt contends Ameren presents difficulties in establishing an Agent
67 relationship, will not split bills upon a customer's request, creates difficulty in
68 obtaining customer data, and limits customer control over their account data (lines
69 169 through 188). I am not aware of significant problems in these areas.

70 Historically, the Ameren Companies have not been affiliated with each other, and
71 Ameren has been working to integrate their operations so as to provide consistent
72 policies and processes. There may have been isolated issues in individual
73 operating companies as Ameren works to complete alignment of multiple
74 processes. Ameren's goal is to provide consistent processes to support the ease of
75 doing business for the customer. Ameren has a process in place for establishing
76 an Agent to ensure the customer understands who has appropriate
77 accountabilities. We are not aware of any specific concerns with this process that
78 has limited customer choice.

79 Customer data is available to customers or their Agents and RESs. Given the
80 transition of AmerenIP into the Ameren customer information systems, there may
81 have been some instances of data being limited or not timely but this should be
82 resolved moving forward. Ameren supports consistent customer treatment and
83 allowing the customer control over their information, including the splitting of
84 their account.

85 **Q. Do you agree with Ms. Witt's contention (lines 490 through line 607) that**
86 **Ameren has inadequate processes in place to ensure consistent and effective**
87 **communication with customers and RESs?**

88 A. Generally no. Again, it is important to draw a distinction between situations in
89 which the RES is acting as the customer's RES and when the RES is acting
90 simply as the customer's Agent. In situations in which the RES is acting as a
91 customer's Agent, the RES would be interacting with Ameren's Customer
92 Contact Centers. In these Contact Centers, Ameren utilizes a group of trained

93 customer service representatives to support questions regarding customer choice.
94 This group is supported by additional customer service staff that handle more
95 complex questions. Ameren provides continuing additional training for these
96 groups to improve our level of service. At times, Ameren customer service staff
97 are unsure as to what capacity a RES representative is serving when they contact
98 the Contact Centers. It is recommended that when a RES representative contacts
99 one of Ameren's Contact Centers, that they identify themselves as acting either as
100 the customer's Agent or as the customer's RES. It is Ameren's experience that
101 the RES representatives are often confused about this distinction. This fact may
102 be the root cause of some of the unsatisfactory interactions between the RES and
103 Ameren representatives.

104 Ameren is always interested in improving customer service and encourages any
105 RES to contact us about issues or concerns at any time just as any customer
106 would.

107 **Q. Do you have any concerns about Ms. Witt's recommendation that Ameren**
108 **develop an electronic bulletin board?**

109 A. Yes. An electronic bulletin board would necessitate the addition of Ameren
110 resources in both the Transmission Services Business Center (TSBC) and the IT
111 Support department. The costs of these additional resources are not included in
112 the cost-of-service filed in this proceeding.

113 **Q. Does Ameren have a counter-proposal to address Ms. Witt's concerns?**

114 A. Yes. The additional cost of the bulletin board proposed by Ms. Witt is primarily
115 associated with the interactive nature of such a site. Ameren proposes to

116 implement a bulletin board where answers to commonly asked questions would
117 be posted. Answers to questions that are received via the TSBC email account
118 and via the TSBC toll-free phone line would also be posted if they have
119 widespread application. The TSBC would ensure that confidential or account-
120 specific information is not disclosed on this site. Therefore, the site could have
121 unlimited access. The site could also contain information about tariff filings,
122 system issues etc. The only difference between Ms. Witt's proposal and the
123 Ameren proposal is that our proposal does not provide the capability for
124 customers or RES to post questions via the site. However, since questions can be
125 sent to Ameren via the TSBC email account or via the TSBC toll-free phone line,
126 I do not consider this a meaningful difference in convenience or functionality.

127 **Q. How do you respond to Ms Witt's proposal to provide a single point of**
128 **contact in the TSBC?**

129 A. The TSBC has recently assigned specific account representative responsibility for
130 all RES accounts with regards to billing matters. All RES should have received
131 or will soon receive a letter informing them of who is their account representative.
132 Because these account representatives deal with billing on a day-to-day basis,
133 assigning each RES account to a specific person is the most efficient manner of
134 operation. However, the TSBC is responsible for dealing with a wide range of
135 RES related issues, most of which are not handled on a day-to-day basis. For
136 example, the TSBC is responsible for RES registration. This is a process that
137 occurs only a few times a year. It is neither practical nor efficient to train every
138 person in the TSBC to handle the RES registration process. For this reason, I

139 prefer not to assign specific account responsibility for dealing with all RES issues,
140 rather to think of a single point of contact as referring to the TSBC itself.
141 Although the TSBC is a small department, the personnel have a wide range of
142 expertise concerning RES-related issues. Various personnel within the TSBC are
143 subject matter experts on various issues related to RES-related, Meter Data
144 Management Agent (MDMA) and transmission billing issues. Training specific
145 individuals to be subject-matter experts on specific processes and issues is the
146 better approach, as compared to training all employees to have some minimal
147 level of knowledge on the full spectrum of topics. Even if the person answering
148 the telephone cannot answer the question, an answer can often be provided within
149 one business day. In fact, one of our department Key Performance Indicators
150 (KPI), or performance goals, is to answer questions within two business days. If a
151 complete answer requires further research and cannot be answered within two
152 business days, then our goal is to provide a timeline for a complete response.

153 **Q. Do you have any further recommendations related to Ms. Witt's testimony**
154 **on communication with the TSBC?**

155 A. Yes. At lines 565-567 of her testimony, Ms. Witt refers to PPO-related issues.
156 Questions related to the PPO service are not RES related issues. The same
157 comment would apply to Post-2006 services such as Basic Generation Services
158 and Real Time Price services where the Ameren Companies are the power and
159 energy suppliers. When the RES representative is asking questions about these
160 services, they are not acting in the role as a RES. They would be acting in the
161 role as a customer or the customer's Agent. As stated previously in my

162 testimony, the RES should contact the Ameren Contact Centers with these
163 questions and should identify themselves as an Agent, not as a RES. By doing
164 this, the RES representative will reduce confusion on both the part of the RES
165 representative and the Ameren representative with whom they are interacting.

166 **Q. In lines 328-408 of her testimony, Ms. Witt lists recommendations for**
167 **improvements and enhancements to Ameren's website. What improvements**
168 **and enhancements is Ameren planning to make to its website?**

169 A. Ameren is planning to make improvements to our website in order to provide a
170 more consistent experience for customers, Agents and RES across all of the
171 Ameren Companies. For instance, the AmerenIP Customer TC Information page
172 that Ms. Witt mentions at line 362 of her revised testimony will be removed. The
173 information on that page which continues to be relevant and important in 2007
174 will be placed on a general information page that will have an identical design for
175 all Illinois accounts, thus resulting in a consistent customer experience. Ameren
176 agrees that some of the information described by Ms. Witt is valuable to
177 customers and RES. Ameren is currently evaluating improvements and
178 enhancements that should be made to its website prior to 2007. Much of the data
179 Ms. Witt describes will be available to customers. Some, but not all, of this data
180 will be available to RES. However, there is one overriding principle Ameren
181 must always consider when evaluating these enhancements. The Ameren
182 customer information website is driven by our customer billing system.
183 Therefore, if a particular piece of data is not available from the customer billing
184 system, then it will not be available on the website. Some information such as the

185 customer's Ameren Company is most definitely available and will be available on
186 the website. We are still evaluating the availability of information.

187 **Q. Are there other considerations to be taken into account when deciding on**
188 **what information should be on the Ameren website?**

189 A. Yes. Customers (and their Agents) and RESs access customer specific
190 information on the Ameren website through two separate and distinct paths or
191 portals. Ameren has created these two separate portals in order to provide the
192 maximum amount of usability for each target group. Also, because the validation
193 criteria are different for these two groups, as ordered by the Commission, it makes
194 sense to maintain separate paths for entry to confidential customer information.
195 Listed below are the data elements mentioned in Ms. Witt's testimony. Each
196 element is listed under the portal through which the data can be accessed.

197	<u>Customer Portal</u>	<u>RES Portal</u>
198	Operating Company	Operating Company
199	Current DS Class	Current DS Class
200	Future DS Class	Future DS Class
201	Current Supply Group and Type	
202	Future Supply Group and Type	
203	DASR Eligibility Date	

204 Because Ameren considers some of this information to be confidential to the
205 customer, we do not plan to make all of the information accessible through the
206 RES portal, as denoted in the table above. A customer always has the right to
207 share customer information with a RES by allowing the RES access to the
208 customer's account through the Customer Portal.

209 **Q. Do you have any concerns about Ms. Witt's recommendations?**

210 A. Yes. It is somewhat unclear what Ms. Witt requests at lines 356-358, but if she is
211 suggesting that Ameren consolidate our Customer and RES Portals, then we do
212 not intend to undertake that action. Ameren considers some of the information
213 Ms. Witt has described as confidential to the specific customer. These elements,
214 such as the customer's DASR eligibility date, are listed under only the Customer
215 Portal in the table above. For this reason, Ameren does not intend to make this
216 type of information available via the RES portal. Consolidating the two portals
217 would substantially limit the usability of the site because confidential customer
218 information would have to be removed. This would unnecessarily reduce the
219 amount of information available to customers.

220 **Q. At lines 325-351 of his revised testimony, Mr Domagalski expresses concern**
221 **about a customer's ability to receive SBO service. Does Ameren plan to**
222 **make any changes to the Supplier Terms and Conditions that affect customer**
223 **eligibility for or the availability of the SBO service?**

224 A. Ameren does not plan to make any changes to the Supplier Terms and Conditions
225 that affect the availability of SBO service. Customers will continue to have the
226 SBO as an option.

227 **Q. Does this conclude your rebuttal testimony?**

228 A. Yes.

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