

**ILLINOIS COMMERCE COMMISSION
DOCKET NOS. 06-0070, 06-0071 and 06-0072**

**REBUTTAL TESTIMONY
OF
PAUL STRAUGHN**

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24

ILLINOIS COMMERCE COMMISSION
DOCKET NOS. 06-0070, 06-0071 AND 06-0072

REBUTTAL TESTIMONY

OF

PAUL STRAUGHN

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**

Q. Please state your name and business address.

A. My name is Paul Straughn. 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 Manager of the Development Energy Delivery department within the Ameren Services Information Technology function. I have responsibility for the application, development and support of the Ameren Billing, Meter Reading, Outage Analysis and Meter Data Management systems, among other support activities.

Q. What is the purpose of your rebuttal testimony?

A. I am responding to the testimony of Coalition witness Jennifer Witt. In her testimony Ms. Witt makes recommendations and observations about the Ameren EDI processes and suggested changes to our overall processes. I will be

25 addressing several topics in her testimony (identified as CNE/PES Exhibit 2.0)
26 around these recommendations and observations.

27 **Q: What is Ms. Witt's contention regarding how Ameren makes use of the**
28 **DUNS numbers for EDI transactions?**

29 A: In Ms. Witt's testimony, specifically lines 81-84 and lines 244-286, she asserts
30 that the Ameren DUNS number should be applied in a uniform manner across the
31 entire EDI transaction set, for each Ameren Company. She further elaborates on
32 how Ameren should clearly communicate with all RESs so that the DUNS
33 number and related procedures are applied in a uniform manner. Ms. Witt as goes
34 on to say how difficult it is to do business with Ameren on any scale because each
35 transaction has to be manually modified in order to be processed efficiently.

36 **Q: What is your response to these remarks?**

37 A: First, I would offer that Ms. Witt needs to understand the difference between
38 general "envelope" information provided on an EDI transaction from the actual
39 "document" information that makes up an EDI transaction. At the highest level
40 on an EDI transaction, the general "envelope" information encapsulates all the
41 "documents" (i.e. 810, 820, 867, 814, etc) that are sent to a business which is
42 included in the ISA segment. Think of this as a way to "bulk" mail transactions
43 to a business. In the general "envelope" information, Ameren uses the generic
44 Ameren Services DUNS number as the Sender ID in all transactions to designate
45 from where the transaction comes . Within the specific documents of each EDI
46 transaction, the DUNS number included is from the Ameren Company that
47 applies to the "document". For example, for an AmerenIP meter read transaction

48 (867), the AmerenIP DUNS number is included with the appropriate segment
49 indicating that this meter read is for AmerenIP. Noteworthy is the fact Ameren
50 converses with hundreds of businesses via these EDI communication methods and
51 we have not received complaints regarding our “lack of consistency”.

52 Second, Ameren currently applies the Ameren DUNS number and relative
53 Operating Company DUNS numbers as appropriate on all EDI transactions per
54 the Illinois Communication Protocol Working Group (“CPWG”) provisions
55 (located at www.choiceinillinois.com). The CPWG provisions were established
56 for all utilities and RESs to follow in terms of the proper protocol for EDI
57 transaction layouts.

58 With all that being said, Ameren will investigate the claim that the DUNS
59 number is used inconsistently in all EDI transactions. If in fact there appears to
60 be inconsistency in application of the DUNS numbers for Ameren and the
61 respective Operating Company and the CPWG provisions, Ameren will strive to
62 correct the situation and work with all RESs that currently communicate with
63 Ameren via EDI means to test and accept the changes. It is important to note a
64 change requested by one RES as in this instance, could affect all other RESs that
65 are currently handling the EDI protocols without difficulty. This will need to be
66 taken into account before any change is finalized.

67 **Q: In Ms. Witt’s testimony (lines 76-79 and 223-242), she recommends that**
68 **customers taking power supply from the Ameren Companies utilize the**
69 **framework in place for RES-supplied customers. She concludes by stating**

70 **that “Allowing RESs to process all customer enrollments using the EDI**
71 **framework will help Ameren realize gains in efficiency.” Do you agree?**

72 A: Her testimony is unclear. I cannot understand why customers should seek or
73 retain a RES to take power supply from one of the Ameren Companies when a
74 simple telephone call will suffice. I do not see any efficiency to be gained under
75 this circumstance for Ameren, or the customer. In fact, it would probably cause
76 Ameren more work which would mean more cost incurred. The idea behind the
77 enrollment transactions is that they are to be used for enrolling customers to a
78 different power supplier other than Ameren. The modifications to all of
79 Ameren’s systems in order to facilitate the “switching” of customers bto the
80 Ameren Company power supply would be extensive and cost prohibitive when
81 compared to the customer or billing agency placing a telephone call.

82 Further, I question whether customers will be satisfied in the event they
83 have to find a RES to enroll them in taking a power supply option from the utility.
84 It seems to be an unnecessary middle step that is neither necessary nor productive.

85 Finally, Ameren already has in place the use of the EDI Invoice (810) and
86 EDI Payment (820) transactions with all customers who meet the necessary
87 requirements for doing business with Ameren electronically. Meaning, the
88 systems are designed to accommodate a customer switching to an Ameren
89 Company power supply option without the need of a middleman.

90 Q: **Ms. Witt makes certain recommendations about EDI 814 transactions and**
91 **process improvements in her testimony. Can you elaborate?**

92 A: Yes. At lines 91-98 of her testimony, Ms. Witt makes certain assertions that
93 Ameren should incorporate certain changes to the 814 Enrollment transactions
94 set. There were three main assertions and I will address each one.

95 **Q: What is the first of these assertions as well as your response?**

96 A: First, Ameren should implement the EDI 814-C transaction regarding meter
97 numbers. My response to this is that Ameren is in the middle of upgrading our
98 existing 814-C process regarding meter numbers and the changes are scheduled
99 for implementation on January 1, 2007. Per normal implementation procedures
100 related to coding changes, Ameren will work with existing RESs to ensure that
101 the improved processes are working as designed prior to the implementation date.

102 **Q: What is the second assertion?**

103 A: In lines 315-326, she suggests all active meters should be identified with an EDI
104 814 enrollment response, claiming this would provide greater efficiency for the
105 RES at the time of enrollment.

106 **Q: What is your response to this recommendation?**

107 A: Currently, the Ameren EDI 814 enrollment response transaction responds back to
108 the RES initial enrollment transaction with an active service point designation
109 instead of the active meter numbers. This is a valid response per the CPWG EDI
110 provisions I mentioned earlier in my testimony. The idea behind the enrollment
111 transaction is exactly that-- enrollment of a customer at an account level. When a
112 DASR is received and approved, our processes will enroll all active electric
113 meters (and service points) for the RES. The process to respond is an
114 acknowledgement that the customer's account was switched; the meter number

115 and service point, for that matter, are extraneous to the real purpose behind the
116 transaction. I fail to understand what benefit the RES would gain by having
117 multiple segments with all active meter numbers given that the RES most likely
118 knows all the active meter numbers due to detailed discussions with the customer
119 prior to creating the initial DASR. In fact, the RES can view all of this
120 information including active meter numbers for a customer, at any time, via our
121 website as long as they have a valid account number/meter number. In this
122 instance the RES does not have to wait for the first bill. Additionally, Ameren
123 has never had a complaint from other RESs in dealing with EDI enrollment
124 responses of this nature.

125 Once more, I need to state that a single change for one RES could result in
126 negative impacts to other RES's operations. Specific changes to already
127 established communication protocols may result in changes to the entirety of the
128 communication systems,.

129 **Q: What is the final assertion of Ms. Witt's testimony and your response?**

130 A: That all drop information (including retroactive drops) should be provided to
131 RESs electronically, in real time. I am unclear as to what specific
132 recommendation Ms. Witt has for Ameren in regards to this statement. It is our
133 belief that Ameren currently relays all drop information to RESs.

134 **Q: In lines 450-454, Ms. Witt recommends that Ameren should provide up to 24**
135 **months of data to both customers and RESs, free of charge. What is your**
136 **response to this recommendation?**

137 A: The reason 24 months of history free of charge is problematic for Ameren, is
138 that we may not have the full 24 months of usage history within our current
139 billing systems. This is due to merger and acquisitions of AmerenCILCO and
140 AmerenIP, where their systems changed or were disregarded. As part of
141 integration activities, only a certain amount of history is converted from the old
142 billing systems of the acquired company to the existing systems of Ameren. That
143 is not to say the data is lost from the old system but rather it is not readily
144 available within the new system. If a RES makes a request for an AmerenIP
145 customer, the last 12 months of data are there and available for easy retrieval from
146 the new system. If the request is for more than 12 months of data, an individual is
147 required to manually retrieve the resultant data. It is a time-consuming process
148 that will eventually end as more data is accumulated within the new system. This
149 manual process is also needed when a meter is changed out within the 24 month
150 time frame.

151 It was simply not economical to piece together usage history from several different
152 systems or across meters as this is a very difficult process to automate and fraught
153 with a high degree of risk for providing bad results. Accordingly the manual
154 process now in place must remain for a period of time, and because of the
155 retrieval of data in this manner, a charge is justified. However, Ameren will
156 provide 24 months of historical usage history to our customers and RESs
157 providing it is available based upon the current service and meter configurations
158 of the accounts starting January 1, 2007.

159 **Q: What are Ms. Witt's recommendations regarding on/off peak splits for**
160 **customers (on their website)?**

161 A: In lines 456-487, Ms. Witt claims Ameren does not always provide customer
162 TOU data regarding on and off peak splits. Specifically, when an account is
163 direct served by a RES, Ameren's website does not display the on/off peak splits.
164 Her recommendation is that Ameren should post this information related to on/off
165 peak splits on our website, and claims this is beneficial for retail competition and
166 foster more accurate pricing.

167 **Q: What is your response to this recommendation?**

168 A: The data available regarding a customer's account is subject to how it is billed in
169 Ameren's billing system. The information that is directly available via our
170 website is retrieved from our current billing system. The billing system identifies
171 and calculates the specific billing determinates required to satisfy the customer's
172 current tariff. In the case where a customer is on a rate that is billed using on/off
173 peak splits, usage rows for the account/service point are created in the database
174 and are available for general public consumption. However, there are some
175 customers who are not billed using any type of on/off peak split, which means
176 that usage rows are not created for this type of billing determinant and are not
177 subsequently available for general consumption from our website. In order to
178 accommodate this recommendation, Ameren would need to modify the existing
179 billing system to calculate usage rows that are not pertinent to the billing process
180 but would only be informational in purpose in order to be available for general
181 consumption from the website. This rather large and intrusive modification to the

182 billing system would result in a waste of critical resource time, meaning that the
183 batch billing process only has a certain amount of time to complete within a given
184 night. Adding additional calculations to the billing process causes the billing
185 process to run longer and waste resources. Therefore, the recommendation should
186 be rejected.

187 I note that for customers on DS-3 and DS-4 (large commercial and industrial
188 customers) rates as well as any RTP product, there will be on/off peak split
189 information available. For customers on DS-1 and DS-2 (residential and small
190 commercial), this information will not be available because the billing
191 calculations process does not require the on/off peak information.

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

193 A. Yes.

194 CHI-1536448v1