

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO,	)	
	)	
Proposed general increase in rates for delivery service.	)	Docket No. 06-0070
	)	
CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS,	)	
	)	
Proposed general increase in rates for delivery service.	)	Docket No. 06-0071
	)	
ILLINOIS POWER COMPANY d/b/a AmerenIP,	)	
	)	
Proposed general increase in rates for delivery service.	)	Docket No. 06-0072 (consol.)
	)	

**AMEREN COMPANIES' RESPONSE TO IIEC REQUEST TO ADMIT**

Pursuant to the June 5, 2006 Ruling and Illinois Supreme Court Rule 216, the Ameren Companies submit this response to the May 9, 2006 Request to Admit (the "Request") of the Illinois Industrial Energy Consumers ("IIEC"):

1. The Ameren Companies have reviewed the values set forth in IIEC's Request and have compared those numbers with the underlying documents in the public record from which the Ameren Companies believe IIEC has gleaned its data.
2. To the extent that the results of the Ameren Companies' analysis of public documents agrees with the results of IIEC's analysis, the Ameren Companies have noted such agreement in qualifying footnotes in the attached spreadsheet ("Exhibit A"). The Ameren Companies admit to the correctness of such values subject to Exhibit A's qualifying footnotes.
3. The Ameren Companies deny the correctness of IIEC's analysis and the resulting values set forth in the Request in the absence of Exhibit A's qualifying footnotes.

4. The Ameren Companies further deny that IIEC's analysis and the resulting values set forth in the Request are relevant for any particular purpose.

Dated: June 6, 2006

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY  
d/b/a AmerenCILCO

CENTRAL ILLINOIS PUBLIC SERVICE  
COMPANY d/b/a AmerenCIPS

ILLINOIS POWER COMPANY d/b/a  
AmerenIP

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**PROOF OF SERVICE**

I, Laura M. Earl, certify that on June 6, 2006, I served a copy of the foregoing Response by electronic mail to the individuals on the Commission's Service List for this Docket.

By: Laura M. Earl  
Attorney for Movant

CHI-1537899v1

# Exhibit A

## RESPONSE TO INDUSTRIAL CONSUMERS REQUEST TO ADMIT

<u>Description</u>	<u>Non A&amp;G Operation &amp; Maintenance Expenses</u>	<u>Administrative &amp; General Expenses</u>
<b>AmerenIP</b>		
<b>Last Order</b>		
AmerenIP Request	\$ 69,920 (1)	\$ 41,798 (1)
Commission Approved	\$ 66,671 (2)	\$ 16,555 (2)
<b>Current Case</b>		
AmerenIP Request	\$ 74,491 (3)	\$ 77,448 (4)
<b>AmerenCILCO</b>		
<b>Last Order</b>		
AmerenCILCO Request	\$ 27,797 (5)	\$ 11,683 (5)
Commission Approved	\$ 25,762 (2)	\$ 6,733 (2)
<b>Current Case</b>		
AmerenCILCO Request	\$ 34,301 (6)	\$ 33,278 (7)
<b>AmerenCIPS</b>		
<b>Last Order</b>		
AmerenCIPS Request	\$ 62,484 (8)	\$ 31,798 (8)
Commission Approved	\$ 57,793 (9)	\$ 26,209 (9)
<b>Current Case</b>		
AmerenCIPS Request	\$ 62,293 (3)	\$ 42,939 (4)

(1) Agrees with Company Rebuttal Filing

(2) Agrees with Commission Order

(3) Agrees with Original Part 285 Filing Pro Forma at Present Rates

(4) Agrees with Original Part 285 Filing Pro Forma at Present and Proposed Rates

(5) Agrees with Company Pro Forma Filing

(6) Agrees with Part 285 Filing As Corrected in response to Administrative Law Judge Letter dated 1/27/06 - Pro Forma at Proposed Rates

(7) Agrees with Original Part 285 Filing and Part 285 Filing As Corrected in response to Administrative Law Judge Letter dated 1/27/06 - Pro Forma at Present and Proposed Rates

(8) Agrees with Company Pro Forma Filings for CIPS + UE Combined

(9) Agrees with Commission Orders for CIPS + UE Combined