

**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.)
	)	

**STATEMENT OF THE AMEREN COMPANIES**

1. The Ameren Companies acknowledge that certain statements in the Surrebuttal Testimony of Ronald Stafford and certain information contained in his rebuttal and surrebuttal exhibits are not correct.
2. Ameren Ex. 16.14, which consists of some schedules and voluminous work orders and invoices, was filed and served on May 26, 2006. The Ameren Companies became aware at the time of hearing that there were some discrepancies between the exhibit as filed and as served, and did not deem it appropriate to introduce the missing material at that time.
3. As a result, Ameren Ex. 16.14, Schedules 1, 2 and 3 contain certain information that is not supported in the record, namely Ameren Ex. 16.14, Schedule 1, page 3, lines 12 through 21, "Amounts Supported by Company" and lines 22 through 35 "Adjustment to Plant Additions Per Company"; Schedule 2, lines 18 through 33, "Amounts Supported by Company" and lines 34 through 53 "Adjustment to Plant Additions Per Company"; and Schedule 3, lines 16

through 29, “Amounts Supported by Company” and lines 30 through 47 “Adjustment to Plant Additions Per Company.”

4. Additionally, there are incorrect statements and information in Mr. Stafford’s Surrebuttal Testimony and Exhibits that have their roots in the filing and service of Ameren Ex. 16.14.

5. In his surrebuttal testimony, Mr. Stafford referenced the material in Ameren Ex. 16.14 in response to the rebuttal testimony of Ms. Theresa Ebrey. Specifically, in response to a contention by Ms. Ebrey that the Ameren Companies had not supported a plant addition reflected in AmerenIP’s proposed rate base, Mr. Stafford asserted that:

For work order 25438, full support for three large invoices were provided on IP Ex. 16.14-WO 25438 prt 1.pdf on page two, IP Ex. 16.14-WO 25438 prt 5.pdf on page one, and IP Ex. 16.14-WO 25438 prt 10.pdf on page one, respectively with additional supporting documents located on these pdf files behind the summary invoice. Adding these three invoices sums to the \$323,857.73 total that was identified as supported on Exhibit 16.14, Schedule 3, Page 3 of 3, column (E), line 36. Of this total, the portion not reflected by Staff has been added back on Exhibit 36.10, Schedule 3, Page 3 of 3, column (E), line 36. Ameren Ex. 36.0, pp.39-40, ll. 882-889 as corrected by Errata filed July 21, 2006.

6. One of the work orders and certain additional supporting documents referenced by Mr. Stafford were not included in Ameren Ex. 16.14. Mr. Stafford was unaware at the time his surrebuttal was filed and at the time errata were submitted that there were documents inadvertently omitted from Ameren Ex. 16.14.

7. Regardless, Mr. Stafford’s statement is not correct, and the corresponding reference on Ameren Ex. 36.10, Sch. 3 is not correct, either. The Ameren Companies acknowledge that “full support” for this project was not provided for the record.

8. Ameren Ex. 36.10, Schedules 1, 2 and 3, contain certain information that is not supported by the record, namely Ameren Ex. 36.10, Schedule 1, page 3, lines 12 through 21, “Amounts Supported by Company” and lines 22 through 35 “Adjustment to Plant Additions Per

Company”; Schedule 2, lines 18 through 33, “Amounts Supported by Company” and lines 34 through 53 “Adjustment to Plant Additions Per Company”; and Schedule 3, lines 16 through 29, “Amounts Supported by Company” and lines 30 through 47 “Adjustment to Plant Additions Per Company.”

9. The Ameren Companies regret this error. They do not seek to supplement the record at this time with any information that they could have provided earlier. They feel compelled, however, to correct Mr. Stafford’s inadvertently erroneous statements, and accept the consequences of their error.

Dated: August 17, 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, Christopher W. Flynn, certify that on August 17, 2006, I served a copy of the foregoing Statement of the Ameren Companies by electronic mail to the individuals on the Commission's Service List for this Docket.

By: /s/ Christopher W. Flynn  
Attorney for the Ameren Companies