

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	
Consideration of the federal standard on)	Docket No. 06-0525
interconnection in Section 1254 of the)	
Energy Policy Act of 2005)	

THE AMEREN ILLINOIS UTILITIES’ REPLY BRIEF ON EXCEPTIONS

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 (“Ameren Illinois Utilities”) submit these comments in reply to the briefs on exception of Commonwealth Edison Company (“ComEd”), Staff of the Illinois Commerce Commission (“Staff”), and the Environmental Law and Policy Center (“ELPC”).

The Ameren Illinois Utilities agree with each of ComEd’s stated exceptions, but will limit their comments here to the first point noted in ComEd’s brief. Specifically, ComEd is correct that that the purpose of this docket is for the Commission to determine whether to adopt the federal standard as required by 16 U.S.C. § 2621, and not to establish agreements and procedures. (ComEd BOE, pp 1, 3.) It appears that Staff’s proposed replacement language in Staff Exception Numbers One and Three is also in line with ComEd’s recommendation. (*See e.g.*, Staff BOE, p. 4 (replacing “state commissions” with “utilities”).) Indeed, all parties – Staff, the Ameren Illinois Utilities, ComEd, and MidAmerican Energy Company – except ELPC are in agreement on this point. (*See, e.g.*, Staff’s New Initial Verified Comments, p. 8. (“[I]n Staff’s view, the primary purpose of this docket is to decide whether or not to adopt the federal interconnection standard. **The Commission is not required to approve specific ‘agreements and procedures.’**”) (emphasis added))

For this reason, the exceptions noted in ELPC's brief are misguided and incorrect. ELPC incorrectly suggests that the Commission should and must determine precisely which "agreements and procedures" constitute "best practices" for Illinois, and must quickly implement those practices through a rule in this docket. (ELPC BOE, pp. 1-4.) This is simply not what the statute says, as all parties but ELPC have agreed. Further, there is no credible record in this proceeding that could even begin to advise the Commission what are the appropriate agreements and best practices.

Moreover, the record shows no identified need for an interconnection rule or tariffed procedures in Illinois. Staff's comments indicate that the Commission has received no formal complaints regarding interconnections, and only two informal complaints, out of 120 reported interconnections since 2003. (Staff's New Initial Verified Comments, p. 15.) The utilities' comments also noted the telling lack of complaints regarding interconnection, as well as large number of successfully completed connections. (Ameren Illinois Utilities' Revised Reply Comments (1/30/07), p. 7 ("The Ameren Illinois Utilities are unaware of any complaints or difficulties regarding distributed generation connection to substantiate any claim of existing barriers in Illinois."); MidAmerican Response to New Initial Comments, pp. 2-3; ComEd Comments (1/30/07), p. 11.) Quite simply, there is no evidence of any identified problem that a rule or a tariff could be tailored to fix.

Perhaps most importantly, there is a strong need for flexibility in this relatively new era of distributed generation connection, from everyone's standpoint. All parties agreed with this statement on some level, in comments. Both the utilities and the generators benefit from flexibility, in order to efficiently, safely, and appropriately respond to changing technology and need. A one-size-fits-all approach, through rule or tariff, would be unworkable and

should not be adopted. Prematurely harnessing a relatively young industry with rules or tariffs that may not meet the industry's current or future needs, for the sole purpose of quickly pushing through a standard procedure, simply does not make sense.

As the Proposed Order notes, the parties will soon conduct workshops to address specific concerns regarding the interconnection process, and the Ameren Illinois Utilities look forward to participating in such a process. However, the Ameren Illinois Utilities strongly disagree that the purpose of such workshops is or should be to frantically devise rules or restrictive tariffs to implement as-yet undefined "agreements and procedures" by August 8, 2007. To do so will negatively impact the emerging distributed resource market in Illinois, as well as cause an unnecessary burden on the utilities. Neither the statute nor the record evidence supports such an unwise course.

The Commission should accept ComEd's recommended changes to the ALJ's March 6, 2007, Proposed Order, for all the reasons noted above and as set forth in ComEd's brief. ELPC's recommended changes should be rejected.

Dated: March 21, 2007

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY,
d/b/a AmerenCILCO,
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COMPANY d/b/a AmerenCIPS, and
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing was filed on e-Docket and served electronically to all parties of record on this 21st day of March, 2007.

/s/ Laura M. Earl
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