

**REBUTTAL TESTIMONY**

**of**

**PETER LAZARE**

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Illinois Commerce Commission

Illinois Commerce Commission On Its Own Motion

-vs.-

Central Illinois Light Company d/b/a AmerenCILCO; Central Illinois Power Company  
d/b/a AmerenCIPS; Illinois Power Company d/b/a AmerenIP

Investigation pursuant to Section 9-250 of Electric Rate Design

Docket No. 07-0165

June 1, 2007

1           **Introduction**  
2

3   **Q.    Please state your name and business address.**

4    A.    My name is Peter Lazare. My business address is 527 East Capitol Avenue,  
5           Springfield, Illinois 62701.  
6

7   **Q.    Are you the same Peter Lazare who provided direct testimony in this**  
8           **proceeding?**

9    A.    Yes, I am.  
10

11   **Q.    What is the purpose of your rebuttal testimony?**

12   A.    My testimony serves four purposes. First, I present my recommended rate  
13           redesign for BGS-2/DS-2 non-residential customers of Central Illinois Light  
14           Company d/b/a AmerenCILCO (“AmerenCILCO”), Central Illinois Public Service  
15           Company d/b/a AmerenCIPS (“AmerenCIPS”) and Illinois Power Company d/b/a  
16           AmerenIP (“AmerenIP”) (collectively, “Ameren” or the “Ameren Companies” or  
17           the “Ameren Illinois Utilities”). The proposed rates are consistent with my  
18           recommendation in my direct testimony (ICC Staff Exhibit 1.0) for new revenue  
19           targets for BGS-1/DS-1 (residential) and BGS-2/DS-2 customers. Second, I  
20           present my recommendation to address bill impacts for DS-3 and DS-4 non-  
21           residential customers by adjusting their delivery service rates. Third, I present an  
22           alternative rate redesign for BGS-1/DS-1 residential and BGS-2/DS-2 non-  
23           residential customers should the Illinois Commerce Commission (“Commission”)

24 not agree with my primary recommendation. Fourth, I respond to Ameren's  
25 recommendation in direct testimony regarding the starting date for the rate  
26 redesign that is adopted by the Commission in this proceeding.

27

28 **Q. Do you provide any specific recommendations for redesigning rates in your**  
29 **rebuttal testimony?**

30 A. Yes. I provide recommendations to design bundled service rates for BGS-2/DS-2  
31 (i.e., non-residential with usage up to 150 kW) and delivery service rates for DS-3  
32 (i.e., non-residential with 150 kW to 1 MW usage) and DS-4 (i.e., non-residential  
33 with usage over 1 MW) customers. I also present an additional set of BGS-1 and  
34 BGS-2 rates for the Commission to consider if it seeks an alternative to my  
35 primary recommendation.

36

37 **Q. Please explain the relationship between the rate redesign you recommend**  
38 **in your rebuttal testimony with the rates you proposed in your direct**  
39 **testimony.**

40 A. The rates I recommend in rebuttal testimony represent an addition to the  
41 proposed rates supported in my direct testimony.

42

43 To recap, I recommended in my direct testimony that the rate design changes  
44 presented in ICC Staff Exhibit 1.0, Schedule 1.03, pages 1-2 be accepted. These  
45 changes included:

46 • A new set of revenue targets for BGS-1/DS-1 and BGS-2/DS-2 customers.

47                   These new targets were based on a shift in revenue recovery for each of  
48                   the three Ameren Companies from residential BGS-1/DS-1 customers to  
49                   small non-residential BGS-2/DS-2 customers.

- 50                   •     The introduction of seasonal delivery service charges for both DS-1 and  
51                   DS-2 customers.

52                   The changes produced higher delivery rates in summer and lower rates in  
53                   winter.

- 54                   •     The redesign of supply charges for residential customers of all three  
55                   Ameren Illinois utilities.

56                   The redesign lowered tail block charges for winter space heating  
57                   customers and increased both summer and first block winter charges as a  
58                   result.

59

60   **Q.     Were bill impacts for non-residential customers discussed in direct**  
61   **testimony by other parties?**

62   A.     Yes, Ameren witness Jones (Ameren Illinois Utilities Exhibit 2.0) and The Grain  
63           and Feed Association of Illinois (“GFA”) witness Adkisson (GFA Ex. 1.0)  
64           discussed these issues in direct testimony.

65

66   **Q.     Will you respond to the direct testimony of Ameren witness Jones and GFA**  
67   **witness Adkisson?**

68   A.     Yes. I will address two key non-residential bill impacts issues. One concerns the  
69           uneven distribution of bill impacts among BGS-2/DS-2 customers of the Ameren

70 Illinois Utilities under current rates. The second involves bill impacts for  
71 intermittent seasonal DS-3 and DS-4 customers resulting from post-2006 rate  
72 design changes.

73

## 74 **Non-Residential BGS-2 Supply Charge Redesign**

75

76 **Q. Why is it necessary to redesign supply charges for BGS-2/DS-2 customers?**

77 A. The transition to post-2006 rates has had a wide variety of effects on the small  
78 non-residential customers of the three Ameren Illinois Utilities. According to  
79 Schedule 1.02 which is attached to my direct testimony, the impacts range from  
80 bill decreases for a number of BGS-2/DS-2 customers to sizeable increases for  
81 other customers within the class.

82

83 While the relationship is inexact, the evidence suggests that the adverse bill  
84 impacts grow with the size of the monthly bills faced by individual customers. For  
85 example, 60.2% of the former Rate 10 Small Use General Service customers on  
86 the AmerenIP system are currently receiving rate decreases. In contrast, only  
87 13.3% of Rate 11 Demand Metered Space Heating customers are receiving rate  
88 decreases. (ICC Staff Exhibit 1.0, Schedule 1.02, p. 1)

89

90 On the AmerenCIPS system, 99.5% of Rate 2B General Electric Service –  
91 Secondary customers currently receives increases of 25% or less. The  
92 corresponding percentage for Rate 9T Light and Power TOU Space Heating

93 Secondary customers is 14.8%. (Ameren Companies' response to Staff Data  
94 Request PL-1.01 (see ICC Staff Exhibit 1.0, Schedule 1.03, pp. 3-4))

95

96 **Q. Why do you consider these disparate impacts problematic?**

97 A. The operations of business, organizational and governmental customers in this  
98 class can be disrupted by sharp increases in costs such as electricity. With rates  
99 sharply rising, bill impacts should be reasonably distributed among non-  
100 residential customers.

101

102 **Q. Is there any difference between residential and non-residential customers  
103 to consider in discussing bill impacts?**

104 A. Yes. A key difference is that non-residential customers have access to a market  
105 for competitive supply while residential customers do not. The existence of  
106 alternative suppliers gives non-residential customers the opportunity to shop for  
107 less expensive power than provided through the auction. While it is clear that this  
108 opportunity to shop exists, it is not clear what kind of savings non-residential  
109 customers may realize in the competitive market because the prices charged by  
110 alternative suppliers are not a matter of public record.

111

112 **Q. Are your efforts to address bill impacts for BGS-2/DS-2 customers  
113 complicated by the rate design proposals presented in your direct  
114 testimony?**

115 A. Yes. One element of the proposal to address bill impacts for residential

116 customers was to shift the recovery of supply costs from the BGS-1 class to the  
117 BGS-2 class. This means that efforts to address bill impacts for BGS-2/DS-2  
118 customers must contend with an overall rise in supply costs for the class.  
119

120 **Q. What supply charges do you propose to address the bill impacts problem**  
121 **for BGS-2 customers?**

122 A. The proposed supply charges are presented in Schedule 2.01. They include the  
123 following features:

- 124 • A declining block supply rate in winter and flat total kwh charges for  
125 bundled service in summer months for AmerenIP and AmerenCILCO.
- 126 • Declining block supply rates in both summer and winter for AmerenCIPS,  
127 and
- 128 • The break point for all declining blocks is 2,000 kWhs of usage per month.  
129

130 **Q. Please begin by explaining the 2,000 kWh breakpoint included in your**  
131 **proposal.**

132 A. The 2,000 kWh per month break point means that all consumption up to 2,000  
133 kWhs per month is subject to a higher charge, while additional usage above this  
134 break point is priced according to a lower second block charge.  
135

136 **Q. What is the purpose of these proposed declining block supply rates?**

137 A. The declining block seeks to address the discrepancy in bill impacts between  
138 smaller and larger customers within the BGS-2 class. As previously noted, the

139 larger customers within the BGS-2/DS-2 class have generally experienced the  
140 largest bill increases within the class. This problem would be addressed by a  
141 declining block rate structure which reduces supply charges for high end usage.  
142

143 **Q. Does the institution of a declining block rate raise any concerns?**

144 A. Yes. As a general rule, declining block rates should be avoided, particularly in  
145 summer months when demand is highest and supply may be limited. The  
146 problem is the declining block structure sends a price signal that encourages  
147 ratepayers to use more electricity and thereby, take advantage of the lower tail  
148 block rate. This encouragement to use more could put a strain on supply price  
149 and availability.  
150

151 **Q. Do you nevertheless believe that a winter declining block supply rate for  
152 BGS-2 customers of all three Ameren Illinois Utilities and a summer  
153 declining block for AmerenCIPS should be implemented at this time?**

154 A. Yes. Despite their questionable cost justification, declining block rates are  
155 needed now to address bill impacts for a number of BGS-2 customers. In the  
156 transition to higher electric rates, the overriding concern from a ratemaking  
157 standpoint is the inordinate bill increases that are disrupting budgets not only for  
158 residential customers but for non-residential customers as well.  
159

160 The problem in the non-residential BGS-2/DS-2 class is that the largest users are  
161 generally experiencing the largest increases. Addressing these particular bill  
162 impacts can be accomplished by reducing usage charges at higher consumption

163 levels. However, charges at lower usage levels cannot be reduced because that  
164 would produce a revenue shortfall. Thus, the resulting structure takes the form of  
165 a declining block rate.

166  
167 While bill impacts for AmerenIP and AmerenCILCO BGS-2/DS-2 customers can  
168 be addressed by instituting a declining block in winter only, corresponding  
169 customers in AmerenCIPS territory also require a declining block in the summer  
170 months. The proposal to implement a declining block rate in summer for BGS-  
171 2/DS-2 customers of AmerenCIPS reflects the need to focus on bill impacts  
172 rather than cost in designing rates for this docket.

173

174 **Q. Do the rates presented in Schedule 2.01 address bill impacts issues in a**  
175 **reasonable and balanced manner?**

176 A. Yes. The proposed rates achieve three objectives. First, they significantly reduce  
177 the number of smaller customers receiving a decrease from their 2006 electricity  
178 bills. Bill decreases for some customers do not make sense when other  
179 customers are facing sizeable increases. It should be noted that because of the  
180 wide range of rates in effect in 2006, it is not possible to eliminate all reductions  
181 from 2006 bills.

182

183 Second, the redesigned rates reduce adverse bill impacts for large users within  
184 the BGS-2 class. While the proposed rates do not entirely eliminate  
185 disproportionate increases for large customers in the class, they do reduce the  
186 absolute levels of increase these customers face.

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Third, the proposed rate redesign accomplishes these goals despite an increase in overall supply costs for the BGS-2 class. That the proposed rates could address these objectives, even as the overall revenue responsibility increases, attests to the reasonableness of the proposed rates.

### **DS-3 and DS-4 Delivery Rate Redesign**

**Q. Were bill impacts for DS-3 and DS-4 customers discussed in direct testimony?**

A. Yes. GFA witness Adkisson discussed the issue in direct testimony on behalf of the Grain and Feed Association of Illinois. (GFA Ex. 1.0) The issue he raised concerns bill impacts that arise from the manner by which delivery service rates are calculated for intermittent, seasonal users. In 2006, intermittent users such as grain dryers who consumed most of their electricity during fall and winter months paid bundled rates that were largely calculated on a usage basis. However, in the transition to post-2006 rates, the delivery component of bills for these intermittent users is now based on demand charges. The problem for these intermittent users is that while their usage levels are low their peak demands are high, so the introduction of distribution demand charges significantly increased their overall bills. For example, more than 80% of the 155 AmerenIP customers on separate grain drying rates in 2006 have received increases in excess of 50% based on current bundled service prices. (Ameren Illinois Utilities' Ex. 2.1, p. 30

210 of 49)

211

212 **Q. What proposal do you make to address the significant effects of these**  
213 **demand charges?**

214 A. I propose to institute a rate limiter on the distribution portion of bills for these  
215 intermittent users. Those customers in the DS-3 and DS-4 classes who consume  
216 20% or less of their annual electricity in summer months would pay a maximum  
217 price for delivery service of 2 cents for each kWh they consume. The effect of  
218 this rate limiter is to prevent these intermittent users from incurring large bill  
219 increases driven by the effect of demand charges for the delivery service  
220 component of their bills.

221

222 **Q. Would this proposal have an adverse bill impact for other customers in the**  
223 **DS-3 and DS-4 classes?**

224 A. Yes. According to Ameren Illinois Utilities' Exhibit 2.8, this limiter is estimated to  
225 reduce the levels of delivery service revenues for the DS-3 and DS-4 classes by  
226 \$1.4 million and \$166 thousand, respectively. The \$1.4 million reduction  
227 corresponds to approximately 3% of the \$47.8 million in annual DS-3 revenues  
228 while the \$166 thousand is approximately 0.5% of the \$32.4 million in DS-4  
229 revenues. This means that other DS-3 and DS-4 customers will experience  
230 delivery service rate increases of approximately 3% and 0.5%, respectively to  
231 cover the shortfall corresponding to the rate limiter.

232

233 **Q. Do you consider these increases a reasonable price to pay to address bill**

234 **impacts for large intermittent users?**

235 A. Yes. The proposed solution for these intermittent users is consistent with the  
236 principles underlying the proposed rate design solutions for BGS-1 and BGS-2  
237 customers. In each situation, a subgroup of the class has been significantly  
238 impacted by the transition to post-2006 rates and I have recommended a  
239 reallocation of rates to ensure a more even distribution of the overall increase  
240 within the class. The proposal for intermittent DS-3 and DS-4 customers would  
241 grant similar rate relief to this subgroup without unduly burdening remaining  
242 customers within the class.

243

## 244 **Summary of Recommended Rate Redesign**

245

246 **Q. Please summarize the overall set of rates you recommend in this**  
247 **proceeding.**

248 A. I recommend the residential BGS-1/DS-1 and non-residential BGS-2/DS-2 rate  
249 design presented in Schedule 2.01. The residential rates feature significant  
250 reductions in the winter tail block rates for residential space heating customers,  
251 combined with modest increases in summer per-kWh charges and larger  
252 increases in first block winter usage charges.

253

254 For the non-residential BGS-2/DS-2 class, I recommend instituting declining  
255 block charges in the winter months for all three Ameren Illinois Utilities. I further  
256 recommend summer declining blocks for the class in the AmerenCIPS territory.

257

258 For delivery services, I propose seasonal rates for the DS-1 and DS-2 classes  
259 that are higher in summer and lower in winter. For DS-3 and DS-4 customers, I  
260 recommend the introduction of a rate limiter of 2 cents per kWh.

261

262 **Q. Do you have any information on the impacts for BGS-1/DS-1 and BGS-2/DS-**  
263 **2 customers of your proposed rate redesign?**

264 A. Yes. The information is presented in Schedules 2.02 and 2.03. Schedule 2.02  
265 presents a comparison of individual rate elements under 2006 rates, current  
266 rates, my proposed rate redesign and an alternative set of rates which I will  
267 discuss at a later juncture in my testimony.

268

269 Schedule 2.03 presents bill impacts for customers under my proposed rates  
270 compared with 2006 rates. The calculations on the residential side include both  
271 electric space heating and non-space heating customers. For non-residential  
272 BGS-2/DS-2 customers, impacts are assessed for both small and large  
273 customers within the class.

274

275 **Q. Please summarize why you believe this set of rates is reasonable and**  
276 **should be approved by the Commission.**

277 A. The proposed rates provide a more balanced distribution of post-2006 bill  
278 increases than the rates currently in effect. The key problem that arose in  
279 January 2007 was the significant bill increases for residential space heating  
280 customers. As previously noted, these customers faced monthly bill increases

281 that approached 200% in some cases.

282

283 The proposed rate redesign has focused on addressing this residential space  
284 heating problem and the resulting rates bring monthly bill increases for these  
285 customers in line with the average increases for the class as a whole. However,  
286 accomplishing this goal requires increased rates elsewhere because the current  
287 proceeding seeks to preserve revenue neutrality for the Ameren utilities. As a  
288 result, it was necessary to increase charges for residential customers in both  
289 summer and in the first block of winter usage. The goal of addressing problems  
290 for residential space heaters also required shifting some revenue responsibility to  
291 BGS-2 customers.

292

293 Within the BGS-2 class, the introduction of declining block rates seeks to more  
294 evenly distribute increases among customers. Current rates put a higher burden  
295 for the rate increase on larger customers within the class. The proposed  
296 declining block rates more evenly distribute the increase among customers within  
297 the class.

298

299 Finally, the proposed rate limiter for DS-3 and DS-4 customers serves to more  
300 evenly distribute post-2006 bill increases among larger customers.

301

302 **Q. Do you offer any cautionary words about your proposed rate redesign?**

303 A. Yes. The key matter to consider is that all changes implemented in the current  
304 proceeding must be revenue neutral. Any benefit conferred on one group of

305 customers must be balanced by higher rates for other customers. Thus, the effort  
306 to address disproportionate increases for residential space heating customers  
307 requires higher rates for other customers. There is simply no way in this  
308 proceeding to address the residential space heating problems without negatively  
309 impacting other customers. Such a solution would only be possible if the revenue  
310 requirements for the three Ameren Illinois Utilities are reduced.

311

312 Nevertheless, I believe the proposed rates represent a meaningful step forward  
313 from current rates because they redistribute rate increases more evenly than  
314 current rates. In my view, customers as a whole will be more willing to accept  
315 current rates if they believe that the increase is evenly distributed. The proposed  
316 rates achieve this goal by more evenly distributing post-2006 bill increases.

317

## 318 **Alternative Rate Designs**

319

320 **Q. Do you believe it is necessary to present the Commission with alternative**  
321 **proposals to the rate redesign you recommend?**

322 A. Yes. Assessing the impacts of bill increases on individual customers is a matter  
323 of judgment. How customers are affected by higher rates depends on a host of  
324 factors which cannot be easily quantified. The rates presented in Schedule 2.01  
325 reflect my judgment of how the more egregious bill impacts for Ameren  
326 customers should be addressed. However, the Commission may conclude that  
327 an alternative approach offers a better solution to the problem. Thus, I will

328 address several alternative rate redesign approaches presented and discussed  
329 in the direct testimony of Ameren witness Jones as well as present an alternative  
330 rate redesign approach that I developed.

331

332 **Q. Does the presentation of alternative approaches serve any other purpose?**

333 A. Yes. It also provides a basis for comparison of the rate redesign I recommend in  
334 my testimony. The Commission can assess for itself the effects of different  
335 approaches to the proposed rate redesign on various subgroups of Ameren  
336 customers.

337

338 **Q. How have you organized your discussion of these rate redesign  
339 alternatives?**

340 A. I will begin by discussing the specific alternatives presented in Ameren witness  
341 Jones' direct testimony. Then I will present another alternative to my  
342 recommended rate redesign and discuss its relative merits. Finally, I will explain  
343 why my recommended rate redesign represents the best approach for the  
344 Commission to adopt in this proceeding.

345

346 **Q. Please summarize the rate redesign alternatives presented in Mr. Jones'  
347 direct testimony.**

348 A. The proposals fall into two general categories. The first consists of alternative  
349 rate designs based upon application of the Commission's rate mitigation  
350 mechanism to individual rate subclasses. The second set of alternatives for

351 residential customers introduces additional declining blocks at higher usage  
352 levels to alleviate rate impacts for space heating customers.

353

354 **Q. Please discuss the alternatives associated with extending the**  
355 **Commission's rate mitigation maximums to the subclass level.**

356 A. Under this approach subgroups such as residential space heating customers  
357 would constitute a separate class under the revised construction of the  
358 Commission's rate mitigation mechanism. Extension of the maximum to  
359 subclasses is designed to avoid the problems that arose when the Commission's  
360 rate mitigation mechanism was used to develop current rates. Under that  
361 approach, the maximum increases set for the residential class as a whole did not  
362 prevent space heating customers from incurring extraordinary bill impacts.

363

364 **Q. What results are achieved by extending the Commission's rate mitigation**  
365 **maximums to the subclass level?**

366 A. The results are inconsistent. Residential space heating customers for AmerenIP  
367 and AmerenCIPS (MetroEast) would realize rate decreases of just over one cent  
368 per kWh. Space heating customers for AmerenCIPS (non-MetroEast) would  
369 receive decreases of less than one-tenth of a cent per kWh and AmerenCILCO  
370 space heating customers would actually receive increases to their current rate  
371 levels. (Ameren Illinois Utilities' Ex. 2.1, p. 39 of 49)

372

373 **Q. What do you therefore conclude concerning the application of the**

374 **Commission's rate mitigation mechanism to address bill impacts issues for**  
375 **the Ameren Illinois Utilities?**

376 A. I believe it would constitute an inefficient and limited means to address current  
377 bill impacts problems. It would only marginally improve matters for some electric  
378 space heating customers and leave others either slightly better or worse off.

379

380 **Q. What would happen if the constraint under the Commission mitigation**  
381 **mechanism were reduced from 150% to 125%?**

382 A. The benefits would increase for all space heating customers of the Ameren  
383 Illinois Utilities, with the per kWh rate reductions for the subgroup ranging from  
384 1.654 cents for AmerenIP to 1.580 cents for AmerenCIPS (MetroEast) to 0.674  
385 cents for AmerenCIPS (non-MetroEast) to 0.436 cents for AmerenCILCO. The  
386 problem lies with the impacts on other classes. For example, on the AmerenCIPS  
387 system BGS-3 customers would receive an average rate decrease of 0.744 cents  
388 per kWh and non-MetroEast residential non-space heating customers would be  
389 saddled with a rate increase of 0.523 cents per kWh. (Ameren Illinois Utilities' Ex.  
390 2.1, p. 40 of 49)

391

392 **Q. Finally, please discuss the impact of lowering the constraint to 100%.**

393 A. The impacts would vary greatly. Residential space heating customers of both  
394 AmerenIP and AmerenCIPS (MetroEast) would incur rate decreases of more  
395 than 2 cents per kWh while AmerenCIPS (non-MetroEast) and AmerenCILCO  
396 residential space heating customers would receive reductions greater than a cent  
397 per kWh. Conversely, non-residential BGS-2/DS-2 customers would receive

398 average increases of approximately one cent per kWh while residential non-  
399 space heating customers of AmerenCIPS (non-MetroEast) would incur increases  
400 of almost a cent per kWh. (Ameren Illinois Utilities' Ex. 2.1, p. 41 of 49) The  
401 magnitude of the increases for BGS-2/DS-2 customers undermines the  
402 usefulness of this rate redesign alternative.

403

404 **Q. Has Ameren witness Jones presented any other concepts for consideration**  
405 **in the redesign of residential rates?**

406 A. Yes, he presented a residential rate structure featuring four separate rate blocks  
407 in the winter months. The blocks include 0-800 kWhs, 801-1500 kWhs, 1501-  
408 3000 kWhs and over 3000 kWhs. The rates feature discounts of 0.675 cents per  
409 kWh in the 801-1500 kWh block; 3.1 cents per kWh in the 1501-3000 kWh block  
410 and 5 cents per kWh in the over 3000 kWh block. The analysis is limited and  
411 results are only presented for AmerenCIPS (MetroEast) electric space heating  
412 customers. (Ameren Illinois Utilities' Ex. 2.1, p. 45 of 49)

413

414 **Q. Do you have any comment on the results?**

415 A. Yes. The rate design changes appear to have only a limited effect on bill impacts  
416 for these residential space heating customers. Under this alternative the  
417 AmerenCIPS (MetroEast) electric space heating customers modeled would still  
418 incur an average winter bill increase of 87% over 2006 rates. (Ameren Illinois  
419 Utilities' Ex. 2.1, p. 45 of 49) This is not a sufficient solution to the problems  
420 currently facing these Ameren customers.

421

422 **Q. Have you developed another set of rates for the Commission to consider?**

423 A. Yes. The alternative presented in Schedule 2.04 is similar to my recommended  
424 set of rates with one key difference. In contrast to my primary proposal, the  
425 alternative features no revenue shift to the non-residential BGS-2 class from the  
426 residential BGS-1 customers. In other words, the alternative assumes no change  
427 in the total amount of supply costs currently recovered from the BGS-1 and BGS-  
428 2 customers.

429

430 **Q. What are the consequent impacts of this alternative?**

431 A. The alternative exacerbates bill impacts for residential customers but eases  
432 impacts for non-residential BGS-2/DS-2 customers. Without the benefit of a  
433 revenue shift rates must increase for residential BGS-1/DS-1 customers.  
434 Conversely, non-residential BGS-2/DS-2 would not have to incur a further rate  
435 increase associated with that revenue shift. The bill impacts for residential BGS-  
436 1/DS-1 customers are presented in Schedule 2.05 and for non-residential BGS-  
437 2/DS-2 customers in Schedule 2.06.

438

439 **Q. How would you assess the relative merits of your proposal and this rate  
440 redesign alternative?**

441 A. The relative merits depend on the objectives for the ratemaking process. If the  
442 focus is on addressing residential bill impacts then my primary proposal is the  
443 more effective tool. A focus more on bill increases for non-residential customers  
444 would favor the alternative approach. Because the rate redesign process is  
445 revenue neutral, there is no way to ameliorate increases for one group of

446 customers without disadvantaging another group.

447

448 **Q. Please summarize why you believe your primary proposal best address bill**  
449 **impact issues for Ameren customers.**

450 A. The advantage of the recommended rates contained in my primary proposal is  
451 that they most aggressively address the most serious bill impacts problem which  
452 is the post-2006 bill increases for residential space heating customers. The size  
453 and scope of the problem quickly became apparent when current rates became  
454 effective in January 2007 and customers received bills featuring extraordinary  
455 increases in electricity costs. The rates I recommend will most effectively mitigate  
456 those large increases without unduly burdening other customers.

457

### 458 **Starting Date**

459

460 **Q. Have the Ameren Companies discussed in direct testimony the starting**  
461 **date for the proposed rate redesign?**

462 A. Yes. Ameren witness Cooper discussed two alternatives for implementing the  
463 proposed changes to retail rates. One proposal would be to delay implementation  
464 until January 1, 2008. The second proposal would entail an October 1, 2007  
465 implementation date. (Ameren Illinois Utilities Ex. 1.0, pp. 9-10)

466

467 **Q. What is your opinion of a January 1, 2008 implementation date?**

468 A. That date would run the risk of another bill impact crisis for Ameren customers. If

469 the Ameren territories experience an early chill this fall, electricity use by space  
470 heating customers could rise and electric bills could soar as they did at the  
471 beginning of this year.

472

473 To avoid the possibility of this occurrence an October 1, 2007 implementation  
474 date should be adopted.

475

476 **Q. Have the Ameren Companies presented any alternative proposals in the**  
477 **event the Commission approves an October 1, 2007 implementation date**  
478 **for rate design changes?**

479 A. Yes. Ameren witness Cooper discussed in direct testimony the creation of a  
480 regulatory asset as a means to recover a delivery services revenue shortfall  
481 resulting from implementation of new rates prior to January 2008. (Ameren  
482 Illinois Utilities' Exhibit 1.0, pp. 9-10, lines 205 – 215)

483

484 **Q. What is your opinion of this regulatory asset proposal for recovery of the**  
485 **revenue shortfall?**

486 A. I do not support this means of recovery for a revenue shortfall for several  
487 reasons. First, Mr. Cooper provides no assurance that such a regulatory asset  
488 will, in fact, be revenue neutral. He provides no evidence that the proposal will  
489 not have an impact on the overall level of revenues collected by the Ameren  
490 Illinois Utilities. Absent that evidence, there is no reason to believe that the  
491 regulatory asset will maintain revenue neutrality. Furthermore, without such

492 evidence, Mr. Cooper presents a proposal that runs the risk of undermining his  
493 own arguments in direct testimony about the importance of preserving revenue  
494 neutrality in this docket.

495

496 **Q. What is your second concern?**

497 A. This proposal is inconsistent with the test year principle that costs for the test  
498 year should be matched with revenues during the same period. The creation of a  
499 regulatory asset as proposed by the Company defers certain revenues identified  
500 in the delivery services revenue requirement to some later unknown time period.  
501 In addition, the actual revenue shortfall will not be known until after the three  
502 month period ending December 31, 2007. Therefore, the regulatory asset will not  
503 be quantified until some future date.

504

505 **Q. What do you conclude concerning how to implement rate changes**  
506 **assuming they become effective October 1, 2007?**

507 A. It is evident that the more reasonable approach is to implement the proposed  
508 rate changes in two steps as I proposed in my direct testimony. In the first step,  
509 on October 1, 2007, the full effect of the proposed rate redesign should be  
510 reflected in changes to supply charges only. In the second step, on January 1,  
511 2008, seasonally-based delivery charges would be placed into effect and supply  
512 charges will be adjusted accordingly so that bundled service ratepayers will see  
513 no change in the overall level of per-kWh charges on their bills. This approach  
514 offers the advantage of producing no delivery service revenue shortfall for the  
515 Ameren Illinois utilities and would thereby obviate the need to establish a

516 regulatory asset.

517

518 **Q. What would be the impact of your proposal on the recovery of supply costs**  
519 **from bundled service ratepayers?**

520 A. Any under (or over) recovery of supply costs resulting from revisions to supply  
521 charges would be recovered (or refunded) to ratepayers through the Market  
522 Value Adjustment (MVA) under Rider MV. Thus, any supply revenue shortfall  
523 would self-correct under Rider MV.

524

525 The recommended rates presented in Schedule 2.03 incorporate significant  
526 changes to all supply charges applicable to customers in the BGS-1 and BGS-2  
527 classes. Given that the amounts paid to suppliers will not change after the  
528 implementation of new supply charges, the issue will arise concerning the  
529 relationship between the supply charges collected from ratepayers and the  
530 supply costs paid to suppliers not only from month to month but also from season  
531 to season. If these relationships were to fluctuate significantly from month to  
532 month that has the potential to cause significant swings in the Rider MVA  
533 adjustment levels that are passed on to ratepayers. That, in turn, can cause  
534 fluctuations in overall electricity bills which could confuse ratepayers and impede  
535 their efforts to forecast monthly electricity costs.

536

537 The objective should be to develop a Rider MVA mechanism that minimizes to  
538 the extent possible the fluctuations in monthly MVA adjustment levels. That is a  
539 matter which Staff will explore further with the Ameren Companies after the

540 current docket is completed.

541

542 **Q. Does this complete your rebuttal testimony?**

543 **A.** Yes, it does.

Residential  
 BGS-1/DS-1

Summary of Staff-recommended Rates

	<u>AmerenCILCO</u>	<u>AmerenCIPS</u>	<u>AmerenCIPS -- Metro East</u>	<u>AmerenIP</u>
<u>Residential BGS-1/DS-1</u>				
Customer Charge	\$ 6.24	\$ 6.24	\$ 6.24	\$ 6.24
Meter Charge	<u>\$ 3.62</u>	<u>\$ 3.62</u>	<u>\$ 3.62</u>	<u>\$ 3.62</u>
Combined	\$ 9.86	\$ 9.86	\$ 9.86	\$ 9.86
Per kWh:				
Summer, all kWh				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.03346	\$ 0.02639	\$ 0.02639	\$ 0.03203
BGS-1	<u>\$ 0.06486</u>	<u>\$ 0.06533</u>	<u>\$ 0.06533</u>	<u>\$ 0.06459</u>
Combined	\$ 0.10061	\$ 0.09401	\$ 0.09401	\$ 0.09891
Winter				
0 to 800				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.02179	\$ 0.01486	\$ 0.01486	\$ 0.01998
BGS-1	<u>\$ 0.08749</u>	<u>\$ 0.08767</u>	<u>\$ 0.08653</u>	<u>\$ 0.08031</u>
Combined	\$ 0.11157	\$ 0.10482	\$ 0.10368	\$ 0.10258
Over 800:				
non-space heat				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.02179	\$ 0.01486	\$ 0.01486	\$ 0.01998
BGS-1	<u>\$ 0.02793</u>	<u>\$ 0.06012</u>	<u>\$ 0.01252</u>	<u>\$ 0.05695</u>
Combined	\$ 0.05201	\$ 0.07727	\$ 0.02967	\$ 0.07922
space heat				
Rider TS (estimated)	no	\$ 0.00229	no	\$ 0.00229
DS-1	separate	\$ 0.01486	separate	\$ 0.01998
BGS-1	rate	<u>\$ 0.02844</u>	rate	<u>\$ 0.01098</u>
Combined		\$ 0.04559		\$ 0.03325

Small Commercial  
 BGS-2/DS-2

Summary of Staff-recommended Rates

	AmerenCIPS --			
	<u>AmerenCILCO</u>	<u>AmerenCIPS</u>	<u>Metro East</u>	<u>AmerenIP</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ 6.04	\$ 6.04
Supplemental Customer Charge	\$ 4.50	\$ 4.50	\$ 4.50	\$ 4.50
Meter Charge	<u>\$ 4.35</u>	<u>\$ 4.35</u>	<u>\$ 4.35</u>	<u>\$ 4.35</u>
Combined	\$ 14.89	\$ 14.89	\$ 14.89	\$ 14.89
Per kWh:				
Summer:				
Rider TS, all kWh	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-2, all kWh	\$ 0.02716	\$ 0.02469	\$ 0.02469	\$ 0.02818
BGS-2				
0 to 2,000 kWh	<u>\$ 0.08995</u>	<u>\$ 0.09561</u>	<u>\$ 0.09561</u>	<u>\$ 0.09231</u>
Combined	<u>\$ 0.11940</u>	<u>\$ 0.12259</u>	<u>\$ 0.12259</u>	<u>\$ 0.12278</u>
Over 2,000 kWh	<u>\$ 0.08995</u>	<u>\$ 0.09044</u>	<u>\$ 0.09044</u>	<u>\$ 0.09231</u>
Combined	<u>\$ 0.11940</u>	<u>\$ 0.11742</u>	<u>\$ 0.11742</u>	<u>\$ 0.12278</u>
Winter:				
Rider TS, all kWh	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-2	\$ 0.01546	\$ 0.01309	\$ 0.01309	\$ 0.01640
BGS-2				
0 to 2,000 kWh	<u>\$ 0.09595</u>	<u>\$ 0.11094</u>	<u>\$ 0.11094</u>	<u>\$ 0.11031</u>
Combined	<u>\$ 0.11370</u>	<u>\$ 0.12632</u>	<u>\$ 0.12632</u>	<u>\$ 0.12900</u>
Over 2,000 kWh	<u>\$ 0.06129</u>	<u>\$ 0.05290</u>	<u>\$ 0.05290</u>	<u>\$ 0.05442</u>
Combined	<u>\$ 0.07904</u>	<u>\$ 0.06828</u>	<u>\$ 0.06828</u>	<u>\$ 0.07311</u>

**AmerenCILCO  
 Residential**

Comparison of Rates in Effect and Proposed

	<u>2006</u>	<u>Current 2007</u>	<u>Increase Over 2006</u>	<u>Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 3.52	\$ 6.24	\$ 2.72	\$ 6.24	\$ 2.72	\$ -	\$ 6.24	\$ 2.72	\$ -
Meter Charge	\$ -	\$ 3.62	\$ 3.62	\$ 3.62	\$ 3.62	\$ -	\$ 3.62	\$ 3.62	\$ -
Combined	\$ 3.52	\$ 9.86	\$ 6.34	\$ 9.86	\$ 6.34	\$ -	\$ 9.86	\$ 6.34	\$ -
			180.1%		180.1%	0.0%		180.1%	0.0%
Summer, all kWh	\$ 0.07479	\$ 0.09581	\$ 0.02102	\$ 0.10061	\$ 0.02582	\$ 0.00480	\$ 0.10357	\$ 0.02878	\$ 0.00776
			28.1%		34.5%	5.0%		38.5%	8.1%
Winter									
First 800 kWh	\$ 0.06180	\$ 0.10501	\$ 0.04321	\$ 0.11157	\$ 0.04977	\$ 0.00656	0.11557	\$ 0.05377	\$ 0.01056
			69.9%		80.5%	6.2%		87.0%	10.1%
800 to 930 kWh	\$ 0.06180	\$ 0.08760	\$ 0.02580	\$ 0.05201	\$ (0.00979)	\$ (0.03559)	\$ 0.05329	\$ (0.00851)	\$ (0.03431)
			41.7%		-15.8%	-40.6%		-13.8%	-39.2%
Over 930 kWh	\$ 0.03521	\$ 0.08760	\$ 0.05239	\$ 0.05201	\$ 0.01680	\$ (0.03559)	\$ 0.05329	\$ 0.01808	\$ (0.03431)
			148.8%		47.7%	-40.6%		51.3%	-39.2%

**AmerenCILCO**  
**BGS-2/DS-2**

Comparison of Rates in Effect and Proposed

	<u>Current 2007</u>	<u>Staff Proposal 2007</u>	<u>Change From Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ -	\$ 6.04	\$ -
Suppl. Customer Charge	\$ 4.50	\$ 4.50	\$ -	\$ 4.50	\$ -
Meter Charge	\$ 4.35	\$ 4.35	\$ -	\$ 4.35	\$ -
Combined	\$ 14.89	\$ 14.89	\$ -	\$ 14.89	\$ -
Summer, all kWh	\$ 0.08943	\$ 0.11940	\$ 0.02997 33.5%	\$ 0.11119	\$ 0.02176 24.3%
Winter					
First 2000 kWh	\$ 0.09243	\$ 0.11370	\$ 0.02127 23.0%	\$ 0.10494	\$ 0.01251 13.5%
Over 2000 kWh	\$ 0.09243	\$ 0.07904	\$ (0.01339) -14.5%	\$ 0.07345	\$ (0.01898) -20.5%

**AmerenCIPS  
 Residential**

Comparison of Rates in Effect and Proposed

	<u>2006</u>	<u>Current 2007</u>	<u>Increase Over 2006</u>	<u>Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 4.75	\$ 6.24	\$ 1.49	\$ 6.24	\$ 1.49	\$ -	\$ 6.24	\$ 1.49	\$ -
Meter Charge	\$ -	\$ 3.62	\$ 3.62	\$ 3.62	\$ 3.62	\$ -	\$ 3.62	\$ 3.62	\$ -
Combined	\$ 4.75	\$ 9.86	\$ 5.11	\$ 9.86	\$ 5.11	\$ -	\$ 9.86	\$ 5.11	\$ -
			107.6%		107.6%	0.0%		107.6%	0.0%
Summer, all kWh	\$ 0.08176	\$ 0.08951	\$ 0.00775	\$ 0.09401	\$ 0.01225	\$ 0.00450	\$ 0.09714	\$ 0.01538	\$ 0.01
			9.5%		15.0%	5.0%		18.8%	8.5%
Winter									
<u>Non-space heat:</u>									
First 800 kWh	\$ 0.06988	\$ 0.07753	\$ 0.00765	\$ 0.10482	\$ 0.03494	\$ 0.02729	\$ 0.10904	\$ 0.03916	\$ 0.03151
			10.9%		50.0%	35.2%		56.0%	40.6%
Over 800 kWh	\$ 0.06988	\$ 0.06012	\$ (0.00976)	\$ 0.07727	\$ 0.00739	\$ 0.01715	\$ 0.08015	\$ 0.01027	\$ 0.02003
			-14.0%		10.6%	28.5%		14.7%	33.3%
<u>Space heat:</u>									
First 400 kWh	\$ 0.06988	\$ 0.09871	\$ 0.02883	\$ 0.10482	\$ 0.03494	\$ 0.00611	\$ 0.10904	\$ 0.03916	\$ 0.01033
			41.3%		50.0%	6.2%		56.0%	10.5%
400 to 800 kWh	\$ 0.04974	\$ 0.09871	\$ 0.04897	\$ 0.10482	\$ 0.05508	\$ 0.00611	\$ 0.10904	\$ 0.05930	\$ 0.01033
			98.5%		110.7%	6.2%		119.2%	10.5%
Over 800 kWh	\$ 0.03350	\$ 0.08130	\$ 0.04780	\$ 0.04559	\$ 0.01209	\$ (0.04)	\$ 0.04693	\$ 0.01343	\$ (0.03437)
			142.7%		36.1%	-43.9%		40.1%	-42.3%

**AmerenCIPS**  
**BGS-2/DS-2**

Comparison of Rates in Effect and Proposed

	Current <u>2007</u>	Staff Proposal <u>2007</u>	Increase Over <u>Current 2007</u>	Alternative Staff Proposal <u>2007</u>	Increase Over <u>Current 2007</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ -	\$ 6.04	\$ -
Suppl. Customer Charge	\$ 4.50	\$ 4.50	\$ -	\$ 4.50	\$ -
Meter Charge	\$ 4.35	\$ 4.35	\$ -	\$ 4.35	\$ -
Combined	\$ 14.89	\$ 14.89	\$ -	\$ 14.89	\$ -
Summer					
First 2000 kWh	\$ 0.087632	\$ 0.12259	\$ 0.03496 39.9%	\$ 0.11461	\$ 0.02698 30.8%
Over 2000 kWh	0.087632	\$ 0.11742	\$ 0.02979 34.0%	\$ 0.10987	\$ 0.02224 25.4%
Winter					
First 2000 kWh	\$ 0.09063	\$ 0.12632	\$ 0.03569 39.4%	\$ 0.11706	\$ 0.02643 29.2%
Over 2000 kWh	\$ 0.09063	\$ 0.06828	\$ (0.02235) -24.7%	\$ 0.06387	\$ (0.02676) -29.5%

**AmerenCIPS -- Metro East  
 Residential**

Comparison of Rates in Effect and Proposed

	<u>2006</u>	<u>Current 2007</u>	<u>Increase Over 2006</u>	<u>Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over 2006</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 4.85	\$ 6.24	\$ 1.39	\$ 6.24	\$ 1.39	\$ -	\$ 6.24	\$ 1.39	\$ -
Meter Charge	\$ -	\$ 3.62	\$ 3.62	\$ 3.62	\$ 3.62	\$ -	\$ 3.62	\$ 3.62	\$ -
Combined	\$ 4.85	\$ 9.86	\$ 5.01	\$ 9.86	\$ 5.01	\$ -	\$ 9.86	\$ 5.01	\$ -
			103.3%		103.3%	0.0%		103.3%	0.0%
Summer, all kWh	\$ 0.08673	\$ 0.08951	\$ 0.00278	\$ 0.09401	\$ 0.00728	\$ 0.00450	\$ 0.09714	\$ 0.01041	\$ 0.00763
			3.2%		8.4%	5.0%		12.0%	8.5%
Winter									
First 600 kWh	\$ 0.05880	\$ 0.09871	\$ 0.03991	\$ 0.10368	\$ 0.04488	\$ 0.00497	\$ 0.10785	\$ 0.04905	\$ 0.00914
			67.9%		76.3%	5.0%		83.4%	9.3%
600 to 800 kWh	\$ 0.02175	\$ 0.09871	\$ 0.07696	\$ 0.10368	\$ 0.08193	\$ 0.00497	\$ 0.10785	\$ 0.08610	\$ 0.00914
			353.8%		376.7%	5.0%		395.9%	9.3%
Over 800 kWh	\$ 0.02175	\$ 0.08130	\$ 0.05955	\$ 0.02967	\$ 0.00792	\$ (0.05163)	\$ 0.03023	\$ 0.00848	\$ (0.05107)
			273.8%		36.4%	-63.5%		39.0%	-62.8%

**AmerenCIPS -- Metro East  
 BGS-2/DS-2**

Comparison of Rates in Effect and Proposed

	<u>Current 2007</u>	<u>Staff Proposal 2007</u>	<u>Increase Over Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ -	\$ 6.04	\$ -
Suppl. Customer Charge	\$ 4.50	\$ 4.50	\$ -	\$ 4.50	\$ -
Meter Charge	\$ 4.35	\$ 4.35	\$ -	\$ 4.35	\$ -
Combined	\$ 14.89	\$ 14.89	\$ -	\$ 14.89	\$ -
Summer					
First 2000 kWh	\$ 0.08763	\$ 0.12259	\$ 0.03496 39.9%	\$ 0.11461	\$ 0.02698 30.8%
Over 2000 kWh	\$ 0.08763	\$ 0.11742	\$ 0.02979 34.0%	\$ 0.10987	\$ 0.02224 25.4%
Winter					
First 2000 kWh	\$ 0.09063	\$ 0.12632	\$ 0.03569 39.4%	\$ 0.11706	\$ 0.02643 29.2%
Over 2000 kWh	\$ 0.09063	\$ 0.06828	\$ (0.02235) -24.7%	\$ 0.06387	\$ (0.02676) -29.5%

**AmerenIP  
 Residential**

Comparison of Rates in Effect and Proposed

	<u>2006</u>	Current <u>2007</u>	Increase Over <u>2006</u>	Staff Proposal <u>2007</u>	Increase Over <u>2006</u>	Increase Over Current <u>2007</u>	Alternative Staff Proposal <u>2007</u>	Increase Over <u>2006</u>	Increase Over Current <u>2007</u>
Customer Charge	\$ 7.96	\$ 6.24	\$ (1.72)	\$ 6.24	\$ (1.72)	\$ -	\$ 6.24	\$ (1.72)	\$ -
Meter Charge	\$ -	\$ 3.62	\$ 3.62	\$ 3.62	\$ 3.62	\$ -	\$ 3.62	\$ 3.62	\$ -
Combined	\$ 7.96	\$ 9.86	\$ 1.90	\$ 9.86	\$ 1.90	\$ -	\$ 9.86	\$ 1.90	\$ -
			23.9%		23.9%	0.0%		23.9%	0.0%
<b>Summer</b>									
First 300 kWh	\$ 0.08315	\$ 0.06739	\$ (0.01576)	\$ 0.09891	\$ 0.01576	\$ 0.03152	\$ 0.10247	\$ 0.01932	\$ 0.03508
			-19.0%		19.0%	46.8%		23.2%	52.1%
Over 300 kWh	\$ 0.07515	\$ 0.06739	\$ (0.00776)	\$ 0.09891	\$ 0.02376	\$ 0.03152	\$ 0.10247	\$ 0.02732	\$ 0.03508
			-10.3%		31.6%	46.8%		36.4%	52.1%
<b>Winter</b>									
First 300 kWh	\$ 0.07707	\$ 0.10341	\$ 0.02634	\$ 0.10258	\$ 0.02551	\$ (0.00083)	\$ 0.10716	\$ 0.03009	\$ 0.00375
			34.2%		33.1%	-0.8%		39.0%	3.6%
300 to 800 kWh	\$ 0.05947	\$ 0.10341	\$ 0.04394	\$ 0.10258	\$ 0.04311	\$ (0.00083)	\$ 0.10716	\$ 0.04769	\$ 0.00375
			73.9%		72.5%	-0.8%		80.2%	3.6%
Over 800 kWh									
Non-space heat	\$ 0.05947	\$ 0.08600	\$ 0.02653	\$ 0.07922	\$ 0.01975	\$ (0.00678)	\$ 0.08235	\$ 0.02288	\$ (0.00365)
			44.6%		33.2%	-7.9%		38.5%	-4.2%
Space heat	\$ 0.02499	\$ 0.08600	\$ 0.06101	\$ 0.03325	\$ 0.00826	\$ (0.05275)	\$ 0.08235	\$ 0.05736	\$ (0.00365)
			244.1%		33.1%	-61.3%		229.5%	-4.2%

**AmerenIP  
 BGS-2/DS-2**

Comparison of Rates in Effect and Proposed

	<u>Current 2007</u>	<u>Staff Proposal 2007</u>	<u>Increase Over Current 2007</u>	<u>Alternative Staff Proposal 2007</u>	<u>Increase Over Current 2007</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ -	\$ 6.04	\$ -
Suppl. Customer Charge	\$ 4.50	\$ 4.50	\$ -	\$ 4.50	\$ -
Meter Charge	\$ 4.35	\$ 4.35	\$ -	\$ 4.35	\$ -
Combined	\$ 14.89	\$ 14.89	\$ -	\$ 14.89	\$ -
Summer, all kWh	\$ 0.09043	\$ 0.12278	\$ 0.03235 35.8%	\$ 0.11330	\$ 0.02287 25.3%
Winter					
First 2000 kWh	\$ 0.09343	\$ 0.12900	\$ 0.03557 38.1%	\$ 0.11767	\$ 0.02424 25.9%
Over 2000 kWh	\$ 0.09343	\$ 0.07311	\$ (0.02032) -21.7%	\$ 0.06752	\$ (0.02591) -27.7%



AmerenCIPS(Except ME and HH) - DS2 - Distribution of Increases by 2006 Bundled Rate

Company	NewDSName	2007RatePdPerInc5%	Rate 10 Municipal Electric Service	Rate 10 Municipal Electric Svc - Primary Disc	Rate 10 Municipal Serv - Special Contract	Rate 2B Gen Elect Svc - Grain Dry - Primary	Rate 2B Gen Elect Svc - Grain Dry - Secondary	Rate 2B Gen Elect Svc and Space Heat	Rate 2B General Electric Service - Primary	Rate 2B General Electric Service - Secondary	Rate 2B General Electric Service - Unmetered	Rate 2B General Electric Svc CATV	Rate 2B General Electric Svc CATV - No Meter	Rate 6T Comm Elect TOU Pri	Rate 6T Comm Elect TOU Sec	Rate 6T Comm Elect TOU Sec - Schools	Rate 9T Light and Power CATV	Rate 9T Light and Power CATV - No Meter	Rate 9T Light and Power TOU Pri_ Unregulated	Rate 9T Light and Power TOU Primary Regulated	Rate 9T Light and Power TOU Secondary	Rate 9T Light and Power TOU Sub-Transmission	Rate 9T Light and Power TOU Transmission	Rate 9T Lt & Pwr TOU Svc Ht Prim Unregulated	Rate 9T Lt & Pwr TOU Svc Ht Primary Regulated	Rate 9T Lt & Pwr TOU Svc Ht Secondary	
AmerenCIPS	DS2	-55%								2					2						4						
AmerenCIPS	DS2	-50%													1						5					1	
AmerenCIPS	DS2	-45%						1		1					2						2					1	
AmerenCIPS	DS2	-40%																								1	
AmerenCIPS	DS2	-35%																			3					2	
AmerenCIPS	DS2	-30%													4						4					2	
AmerenCIPS	DS2	-25%						3							1						7					1	
AmerenCIPS	DS2	-20%						2		1					4						7					14	
AmerenCIPS	DS2	-15%						3		1					4						5					1	
AmerenCIPS	DS2	-10%						8		3					5		1				11					5	
AmerenCIPS	DS2	-5%					6	6		32	1				11			1			20					33	
AmerenCIPS	DS2	0%					17	7	1	146	1				14	1				1	39					79	
AmerenCIPS	DS2	5%					11	13	2	947	7		1		9	1					44					229	
AmerenCIPS	DS2	10%	1				8	15	2	2367	17	4	6		21						56				1	1039	
AmerenCIPS	DS2	15%				1	11	33	1	3277	27	7	5		25	2				1	80					2501	
AmerenCIPS	DS2	20%					17	44	1	4506	20	9	6		30						124					3477	
AmerenCIPS	DS2	25%					15	73	2	6191	19	9	14		41	1				1	155					4769	
AmerenCIPS	DS2	30%					14	85	4	7998	9	12	53		59	6				1	173					6541	
AmerenCIPS	DS2	35%	5				14	107	3	6035	4	8	58		57	4				1	227					8439	
AmerenCIPS	DS2	40%	20				5	111	2	1738	2	8	5		78	1					261					6548	
AmerenCIPS	DS2	45%	37			1		124	4	361	1	2	1		86	3					268				1	2262	
AmerenCIPS	DS2	50%	57	1			1	134	4	171	4	2			86					2	240					921	
AmerenCIPS	DS2	55%	63					103	6	53	1	1			82						282			2		740	
AmerenCIPS	DS2	60%	72					112	1	27	1				74	1					226					638	
AmerenCIPS	DS2	65%	103	1	1			93		13	1			2	89	1				2	197					561	
AmerenCIPS	DS2	70%	125	2				85	2	10					93	1				3	169		1			549	
AmerenCIPS	DS2	75%	93	3				71	4	6				2	63		1		1	10	121	1			1	549	
AmerenCIPS	DS2	80%	121	2				71	2	4				2	55		2			5	64				1	424	
AmerenCIPS	DS2	85%	120	1				59	4	2					53	3	2			5	53				4	369	
AmerenCIPS	DS2	90%	148					38	2					2	41		3			3	20				1	335	
AmerenCIPS	DS2	95%	162	1				32	2	1				3	26	1	5	1		7	14					262	
AmerenCIPS	DS2	100%	169	1				31	2					4	29	1	4	3		9	8					256	
AmerenCIPS	DS2	105%	170	1				11	2					2	22			2	1	6	1					263	
AmerenCIPS	DS2	110%	185					12	1	1					16					3	4			1	1	220	
AmerenCIPS	DS2	115%	239					11	1						4				1	6						224	
AmerenCIPS	DS2	120%	156					9	1	1					5	1				7						263	
AmerenCIPS	DS2	1.25	28					9							4					1	1					1	180
AmerenCIPS	DS2	1.3	27					2	1						1					2	2			1		44	
AmerenCIPS	DS2	1.35	21					5		1				2	1					1	4			1	1	36	
AmerenCIPS	DS2	1.4	3					7							1					4	2					36	
AmerenCIPS	DS2	1.45	3					2												3	2			1	1	17	
AmerenCIPS	DS2	1.5	6					2	1						1					2	2					10	
AmerenCIPS	DS2	1.55	3					1	1											3	1					14	
AmerenCIPS	DS2	1.6	1					2							1	1				3						9	
AmerenCIPS	DS2	1.65	1					1	1											2					1	8	
AmerenCIPS	DS2	1.7	3					1	1						1						3					6	
AmerenCIPS	DS2	1.75						4	1												3					9	
AmerenCIPS	DS2	1.8													1											5	
AmerenCIPS	DS2	1.85						1	3	1																1	
AmerenCIPS	DS2	1.9							2																	5	
AmerenCIPS	DS2	1.95	1																		1					2	
AmerenCIPS	DS2	2	2					1		1					1											2	
																										5	

Total  
8  
7  
7  
1  
5  
10  
12  
14  
14  
33  
79  
229  
1039  
3477  
4769  
6541  
8439  
6548  
2262  
921  
740  
638  
561  
549  
549  
424  
369  
335  
262  
256  
263  
220  
224  
263  
180  
44  
36  
36  
17  
10  
14  
9  
8  
6  
9  
5  
1  
5  
2  
2  
5

**AmerenCIPS-ME - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2007RateReqPerIncr5%	Rate 2 Sm Gen El Svc-Unmetrd w/o Cust Chg	Rate 2 Small Gen Elec Svc - Demand	Rate 2 Small Gen Elec Svc - No Demand	Rate 2 Small Gen Electric Svc-Unmetered	Rate 3 Large General Electric Service TOU	Rate 4 Primary Electric Service TOU	Total
AmerenCIPS-ME	DS2	-55%					3		3
AmerenCIPS-ME	DS2	-45%					1		1
AmerenCIPS-ME	DS2	-40%					3	1	4
AmerenCIPS-ME	DS2	-30%					2		2
AmerenCIPS-ME	DS2	-25%					1	1	2
AmerenCIPS-ME	DS2	-20%					1		1
AmerenCIPS-ME	DS2	-15%					2		2
AmerenCIPS-ME	DS2	-10%			1		2		3
AmerenCIPS-ME	DS2	-5%					2		2
AmerenCIPS-ME	DS2	0%					2		2
AmerenCIPS-ME	DS2	5%			36		2		38
AmerenCIPS-ME	DS2	10%		1	128	2	3		134
AmerenCIPS-ME	DS2	15%		2	177	3	3	1	186
AmerenCIPS-ME	DS2	20%		2	226	1	1		230
AmerenCIPS-ME	DS2	25%		3	248	2	3	2	258
AmerenCIPS-ME	DS2	30%		4	281	5	2		292
AmerenCIPS-ME	DS2	35%		3	386	28	4	1	422
AmerenCIPS-ME	DS2	40%		5	489	134	4		632
AmerenCIPS-ME	DS2	45%		19	603	131	1		754
AmerenCIPS-ME	DS2	50%		23	609	2	8		642
AmerenCIPS-ME	DS2	55%		42	612	1	4		659
AmerenCIPS-ME	DS2	60%		75	704		4		783
AmerenCIPS-ME	DS2	65%		52	512		4		568
AmerenCIPS-ME	DS2	70%	1	26	337		6		370
AmerenCIPS-ME	DS2	75%	41	22	183		5		251
AmerenCIPS-ME	DS2	80%		10	98		4		112
AmerenCIPS-ME	DS2	85%		6	51		4		61
AmerenCIPS-ME	DS2	90%		5	44		3		52
AmerenCIPS-ME	DS2	95%	1	1	44		1		47
AmerenCIPS-ME	DS2	100%			36		3		39
AmerenCIPS-ME	DS2	105%		4	31		2		37
AmerenCIPS-ME	DS2	110%		3	16		3		22
AmerenCIPS-ME	DS2	115%	1		23		2		26
AmerenCIPS-ME	DS2	120%		1	21		2		24
AmerenCIPS-ME	DS2	125%		1	18				19
AmerenCIPS-ME	DS2	130%		2	21				23
AmerenCIPS-ME	DS2	1.35			12		2		14
AmerenCIPS-ME	DS2	1.4		1	6				7
AmerenCIPS-ME	DS2	1.45		4	10				14
AmerenCIPS-ME	DS2	1.5		6	9				15
AmerenCIPS-ME	DS2	1.55		5	5				10
AmerenCIPS-ME	DS2	1.6		1	2				3
AmerenCIPS-ME	DS2	1.65			2				2
AmerenCIPS-ME	DS2	1.65			2				2
AmerenCIPS-ME	DS2	1.8			1				1
AmerenCIPS-ME	DS2	1.9		1					1
AmerenCIPS-ME	DS2	1.95			1				1

**AmerenCIPS-HH - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2007RateRedPercInct5%	SC 2 Small General Service	SC 2 Small General Service - CATV No Meter	SC 3 Large General Service	Total
AmerenCIPS-HH	DS2	0%	2			2
AmerenCIPS-HH	DS2	5%	17			17
AmerenCIPS-HH	DS2	10%	25			25
AmerenCIPS-HH	DS2	15%	23			23
AmerenCIPS-HH	DS2	20%	35			35
AmerenCIPS-HH	DS2	25%	45			45
AmerenCIPS-HH	DS2	30%	63			63
AmerenCIPS-HH	DS2	35%	71			71
AmerenCIPS-HH	DS2	40%	55	1		56
AmerenCIPS-HH	DS2	45%	63			63
AmerenCIPS-HH	DS2	50%	47			47
AmerenCIPS-HH	DS2	55%	44	5	1	50
AmerenCIPS-HH	DS2	60%	26			26
AmerenCIPS-HH	DS2	65%	10			10
AmerenCIPS-HH	DS2	70%	7			7
AmerenCIPS-HH	DS2	75%	4			4
AmerenCIPS-HH	DS2	80%	5			5
AmerenCIPS-HH	DS2	85%	4			4
AmerenCIPS-HH	DS2	95%	4			4
AmerenCIPS-HH	DS2	100%	4			4
AmerenCIPS-HH	DS2	105%	1			1
AmerenCIPS-HH	DS2	110%	1			1
AmerenCIPS-HH	DS2	115%	3			3
AmerenCIPS-HH	DS2	120%	1			1
						0
						0
						0

Notes:

Excludes customers with usage under 600 kwhr/year

Includes Customers with less than 12 months of billing data



Residential  
 BGS-1/DS-1

Summary of Alternative Rate Option

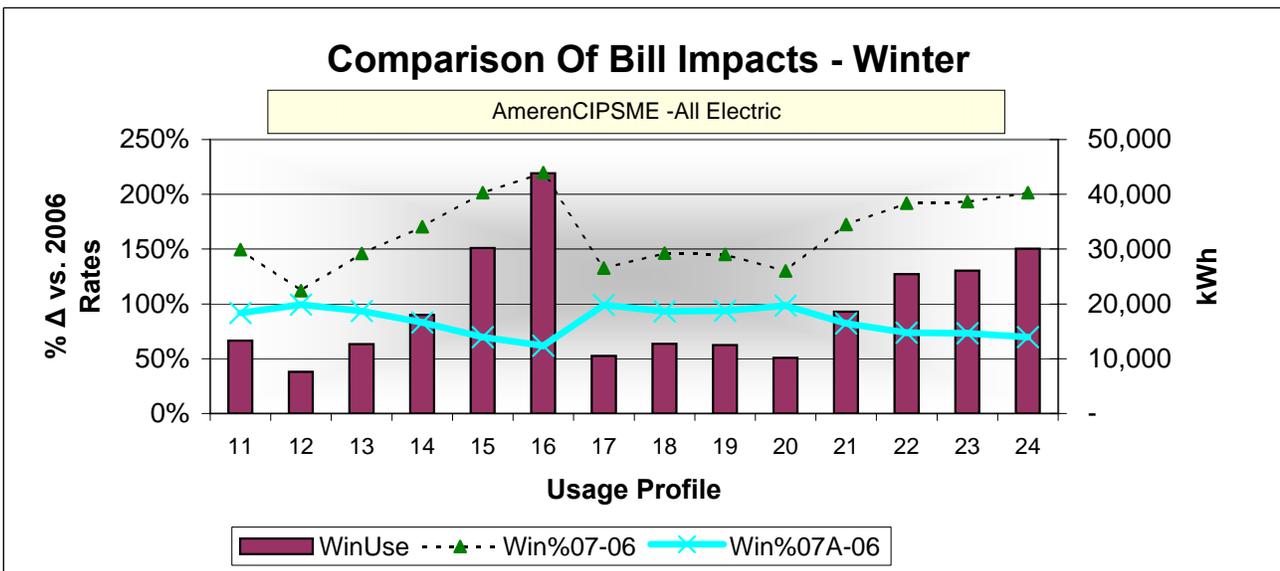
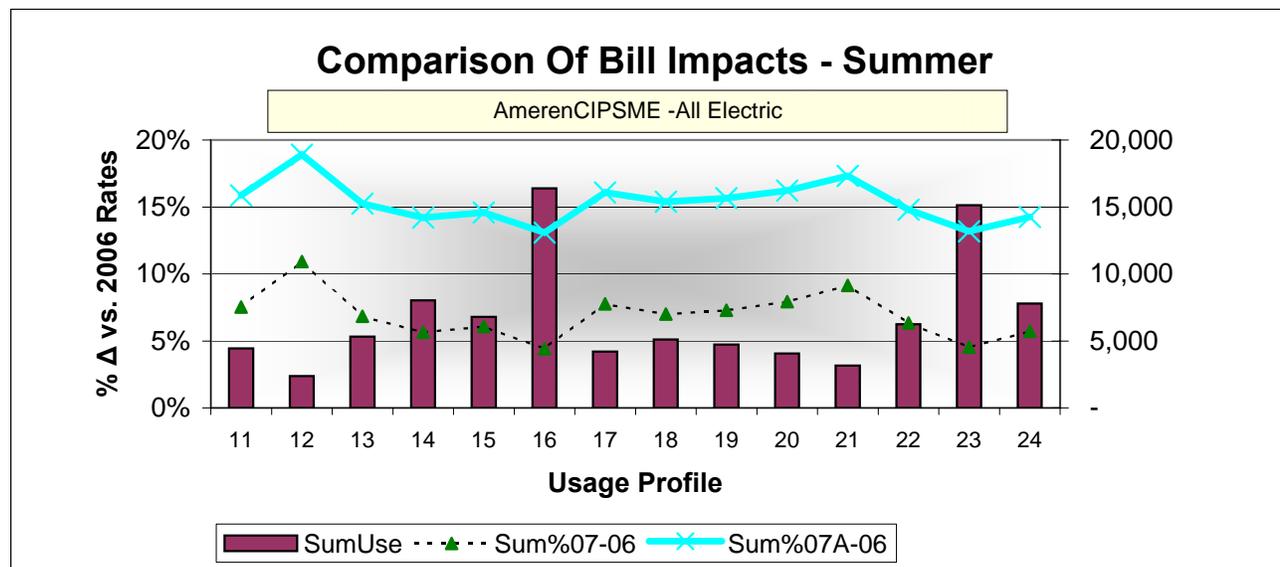
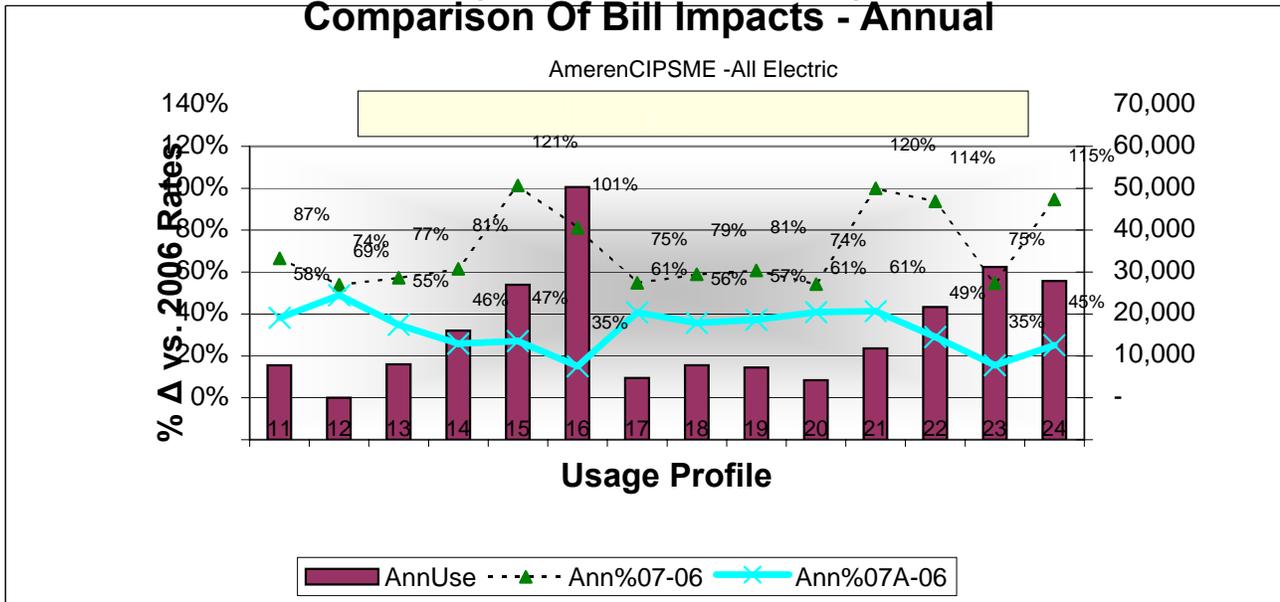
	<u>AmerenCILCO</u>	<u>AmerenCIPS</u>	<u>AmerenCIPS -- Metro East</u>	<u>AmerenIP</u>
<u>Residential BGS-1/DS-1</u>				
Customer Charge	\$ 6.24	\$ 6.24	\$ 6.24	\$ 6.24
Meter Charge	\$ 3.62	\$ 3.62	\$ 3.62	\$ 3.62
Combined	\$ 9.86	\$ 9.86	\$ 9.86	\$ 9.86
Per kWh:				
Summer, all kWh				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.03346	\$ 0.02639	\$ 0.02639	\$ 0.03203
BGS-1	\$ 0.06782	\$ 0.06846	\$ 0.06846	\$ 0.06815
Combined	\$ 0.10357	\$ 0.09714	\$ 0.09714	\$ 0.10247
Winter				
0 to 800				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.02179	\$ 0.01486	\$ 0.01486	\$ 0.01998
BGS-1	\$ 0.09148	\$ 0.09189	\$ 0.09069	\$ 0.08489
Combined	\$ 0.11556	\$ 0.10904	\$ 0.10784	\$ 0.10716
Over 800:				
non-space heat				
Rider TS (estimated)	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-1	\$ 0.02179	\$ 0.01486	\$ 0.01486	\$ 0.01998
BGS-1	\$ 0.02921	\$ 0.06300	\$ 0.01308	\$ 0.06008
Combined	\$ 0.05329	\$ 0.08015	\$ 0.03023	\$ 0.08235
space heat				
Rider TS (estimated)	no	\$ 0.00229	no	\$ 0.00229
DS-1	separate	\$ 0.01486	separate	\$ 0.01998
BGS-1	rate	\$ 0.02977	rate	\$ 0.01155
Combined		\$ 0.04692		\$ 0.03382

Small Commercial  
 BGS-2/DS-2

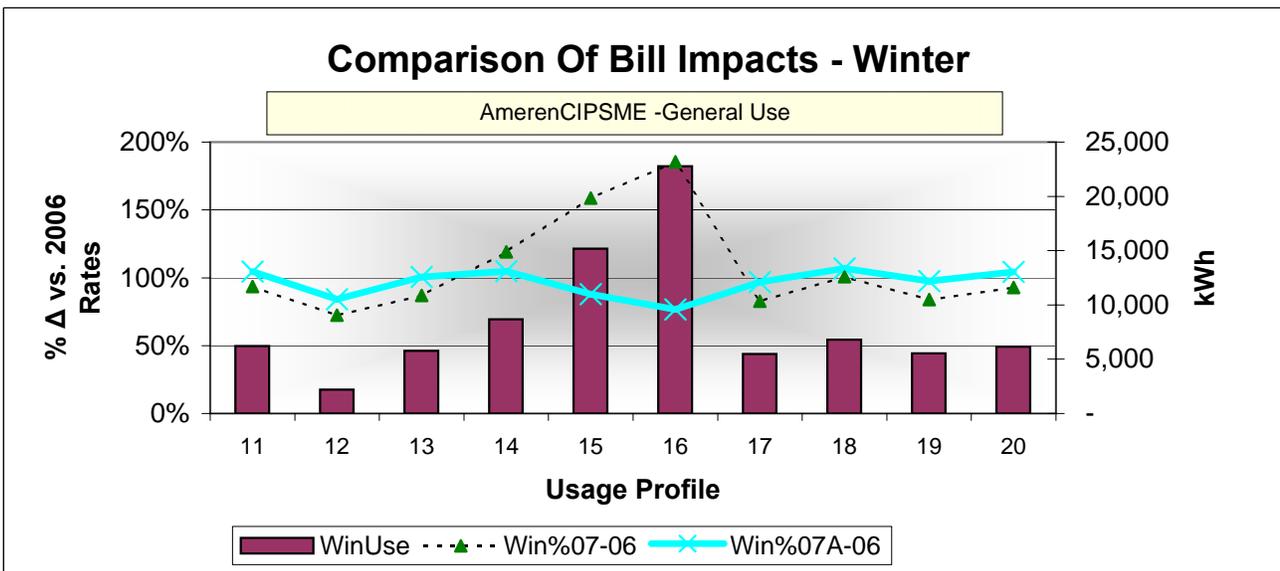
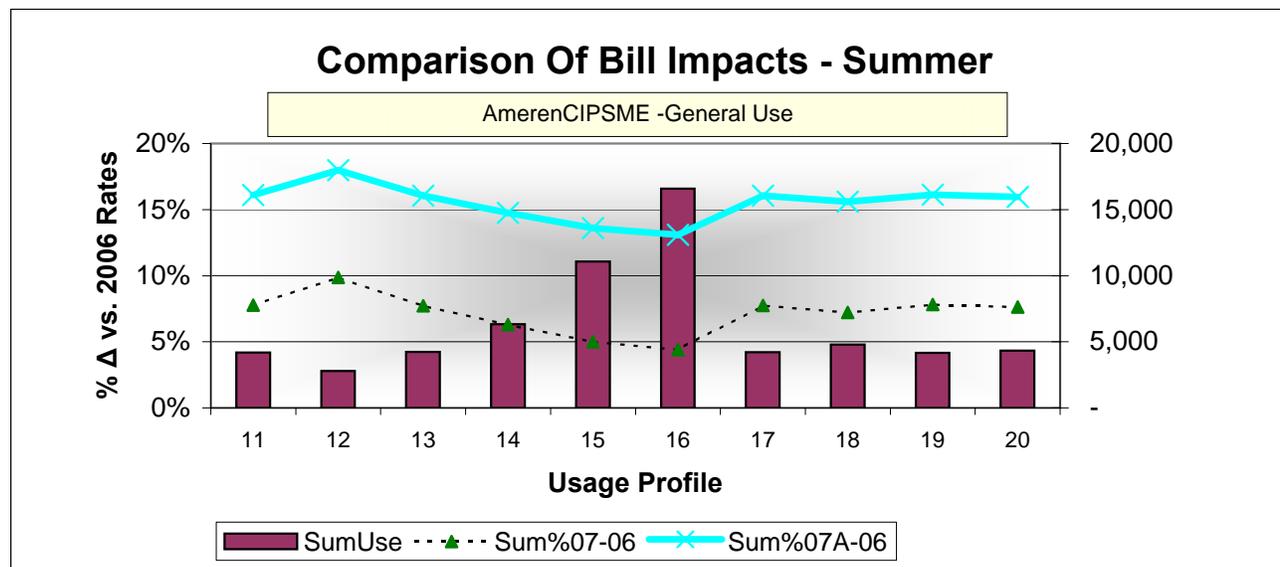
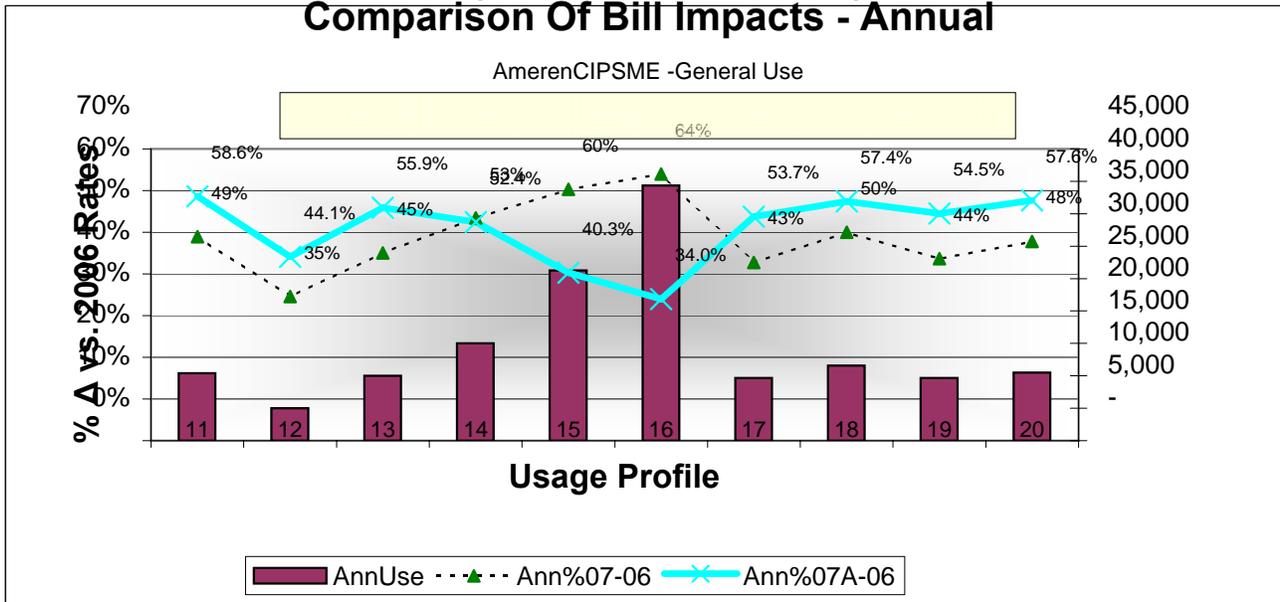
Summary of Alternative Rate Option

	<u>AmerenCILCO</u>	<u>AmerenCIPS</u>	<u>AmerenCIPS -- Metro East</u>	<u>AmerenIP</u>
Customer Charge	\$ 6.04	\$ 6.04	\$ 6.04	\$ 6.04
Supplemental Customer Charge	\$ 4.50	\$ 4.50	\$ 4.50	\$ 4.50
Meter Charge	<u>\$ 4.35</u>	<u>\$ 4.35</u>	<u>\$ 4.35</u>	<u>\$ 4.35</u>
Combined	\$ 14.89	\$ 14.89	\$ 14.89	\$ 14.89
Per kWh:				
Summer:				
Rider TS, all kWh	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-2, all kWh	\$ 0.02716	\$ 0.02469	\$ 0.02469	\$ 0.02818
BGS-2				
0 to 2,000 kWh	<u>\$ 0.08174</u>	<u>\$ 0.08763</u>	<u>\$ 0.08763</u>	<u>\$ 0.08282</u>
Combined	<u>\$ 0.11119</u>	<u>\$ 0.11461</u>	<u>\$ 0.11461</u>	<u>\$ 0.11329</u>
Over 2,000 kWh	<u>\$ 0.08174</u>	<u>\$ 0.08289</u>	<u>\$ 0.08289</u>	<u>\$ 0.08282</u>
Combined	<u>\$ 0.11119</u>	<u>\$ 0.10987</u>	<u>\$ 0.10987</u>	<u>\$ 0.11329</u>
Winter:				
Rider TS, all kWh	\$ 0.00229	\$ 0.00229	\$ 0.00229	\$ 0.00229
DS-2	\$ 0.01546	\$ 0.01309	\$ 0.01309	\$ 0.01640
BGS-2				
0 to 2,000 kWh	<u>\$ 0.08719</u>	<u>\$ 0.10168</u>	<u>\$ 0.10168</u>	<u>\$ 0.09898</u>
Combined	<u>\$ 0.10494</u>	<u>\$ 0.11706</u>	<u>\$ 0.11706</u>	<u>\$ 0.11767</u>
Over 2,000 kWh	<u>\$ 0.05569</u>	<u>\$ 0.04848</u>	<u>\$ 0.04848</u>	<u>\$ 0.04883</u>
Combined	<u>\$ 0.07344</u>	<u>\$ 0.06386</u>	<u>\$ 0.06386</u>	<u>\$ 0.06752</u>

**Ameren Illinois Utilities**  
**Comparison of Residential Bill Impacts**  
**Comparison Of Bill Impacts - Annual**

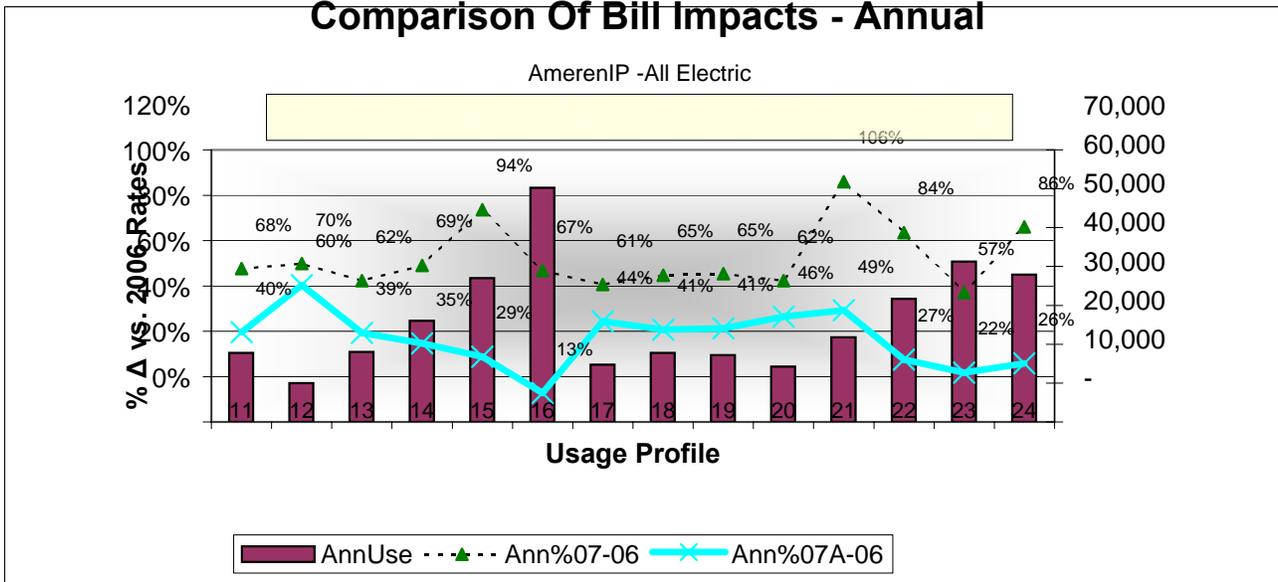


## Ameren Illinois Utilities Comparison of Residential Bill Impacts Comparison Of Bill Impacts - Annual

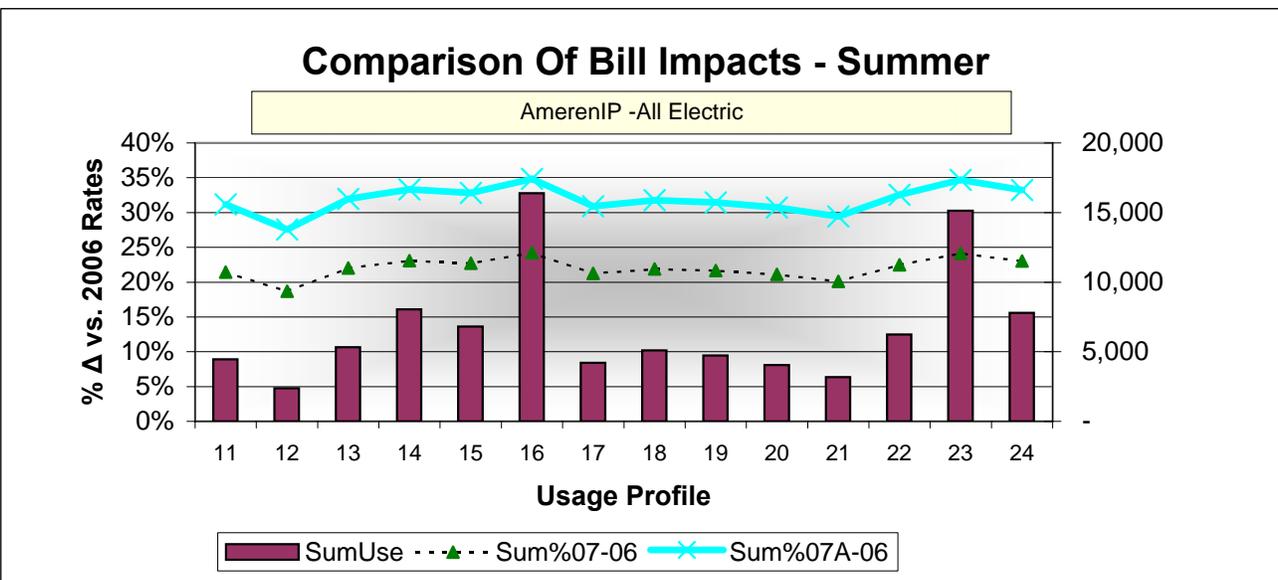


**Ameren Illinois Utilities  
 Comparison of Residential Bill Impacts**

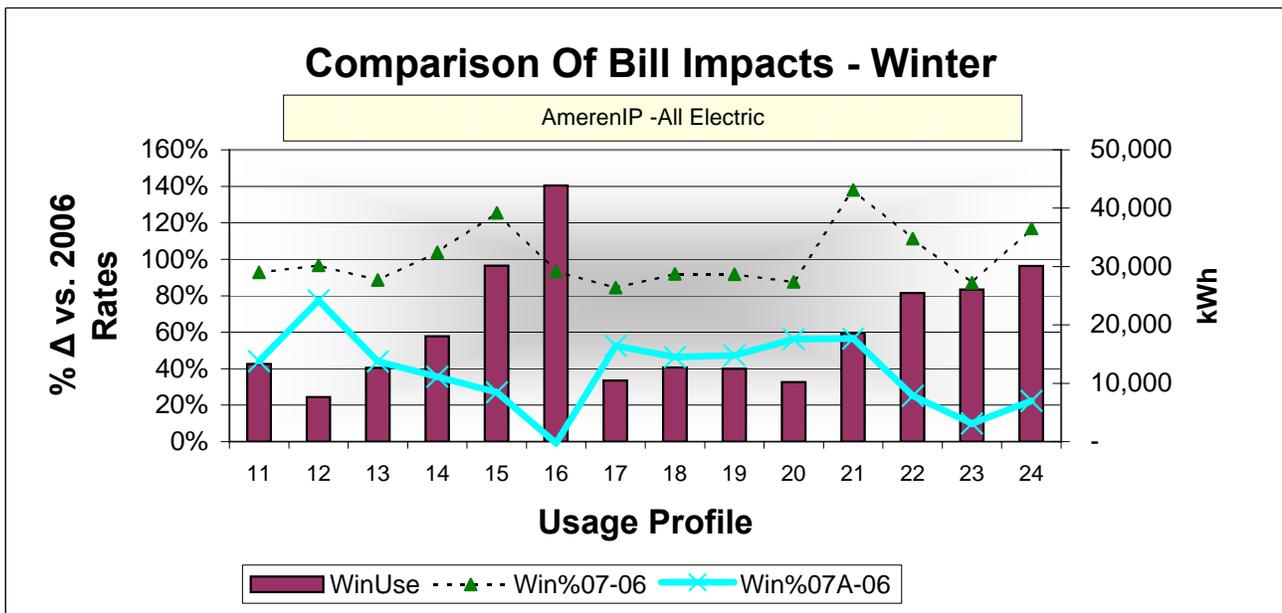
**Comparison Of Bill Impacts - Annual**



**Comparison Of Bill Impacts - Summer**

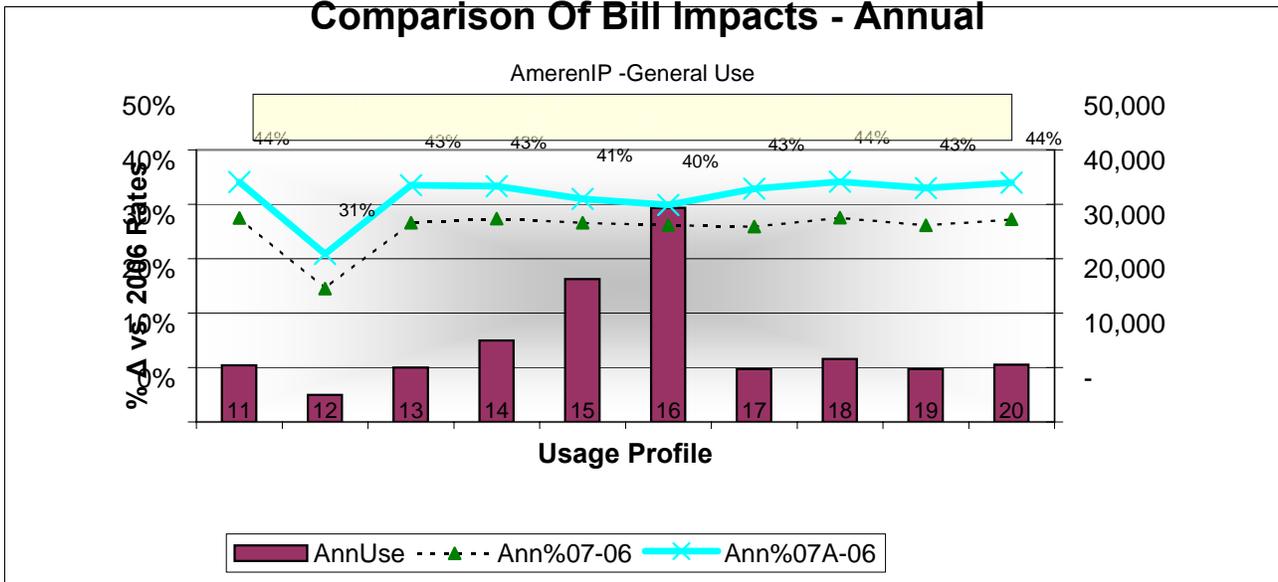


**Comparison Of Bill Impacts - Winter**

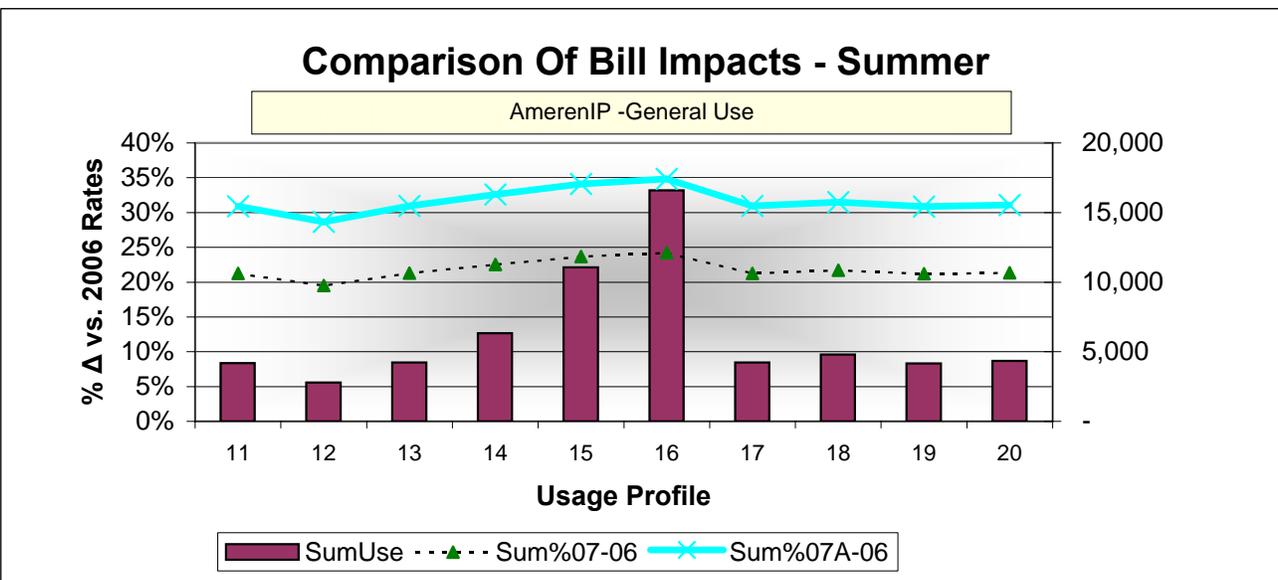


**Ameren Illinois Utilities  
 Comparison of Residential Bill Impacts**

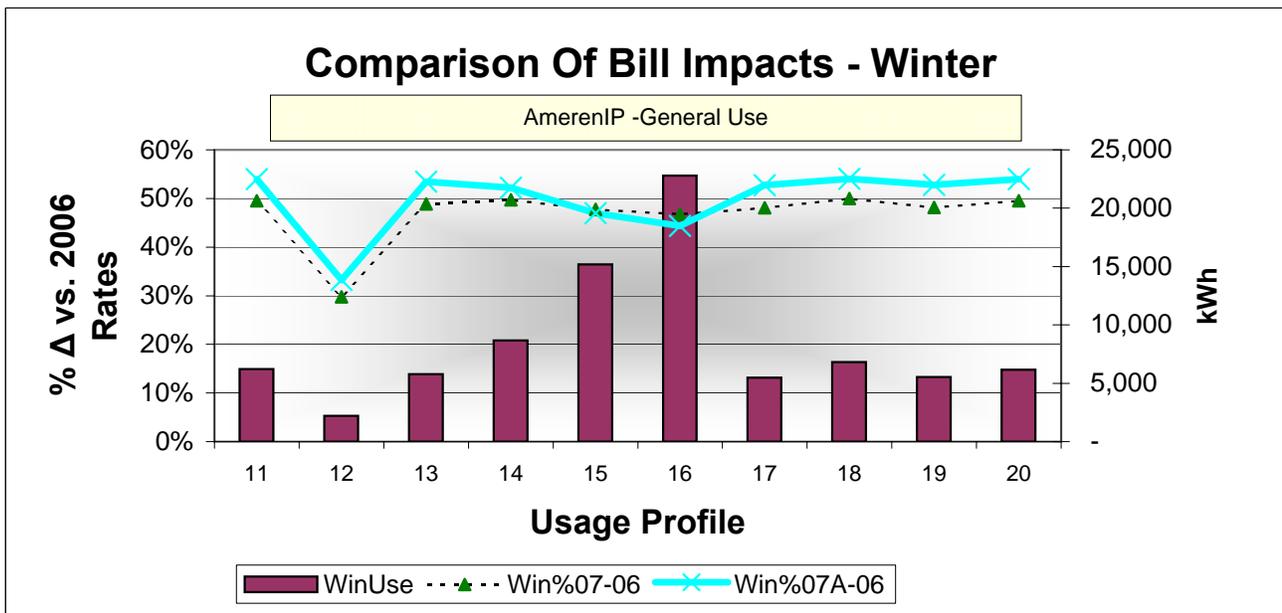
**Comparison Of Bill Impacts - Annual**



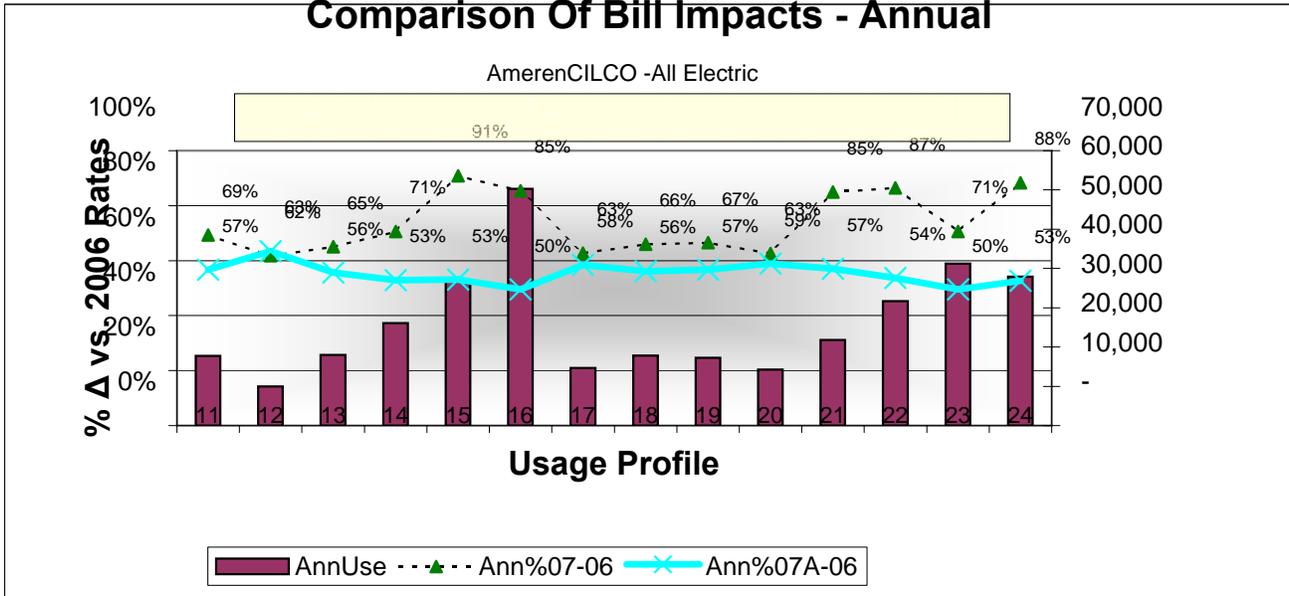
**Comparison Of Bill Impacts - Summer**



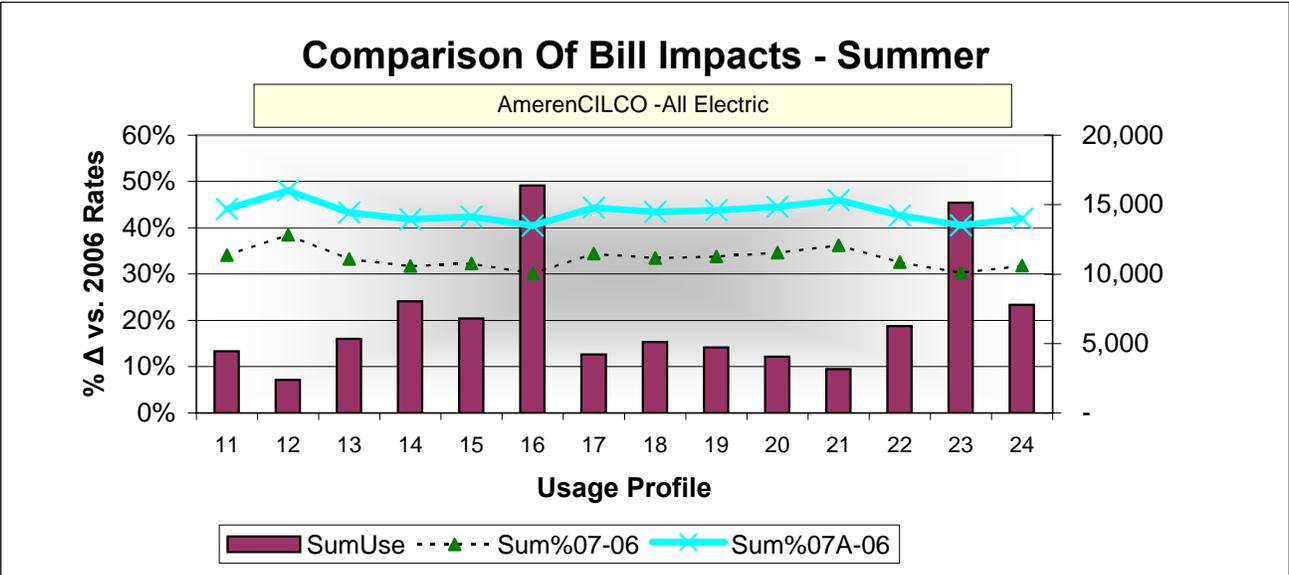
**Comparison Of Bill Impacts - Winter**



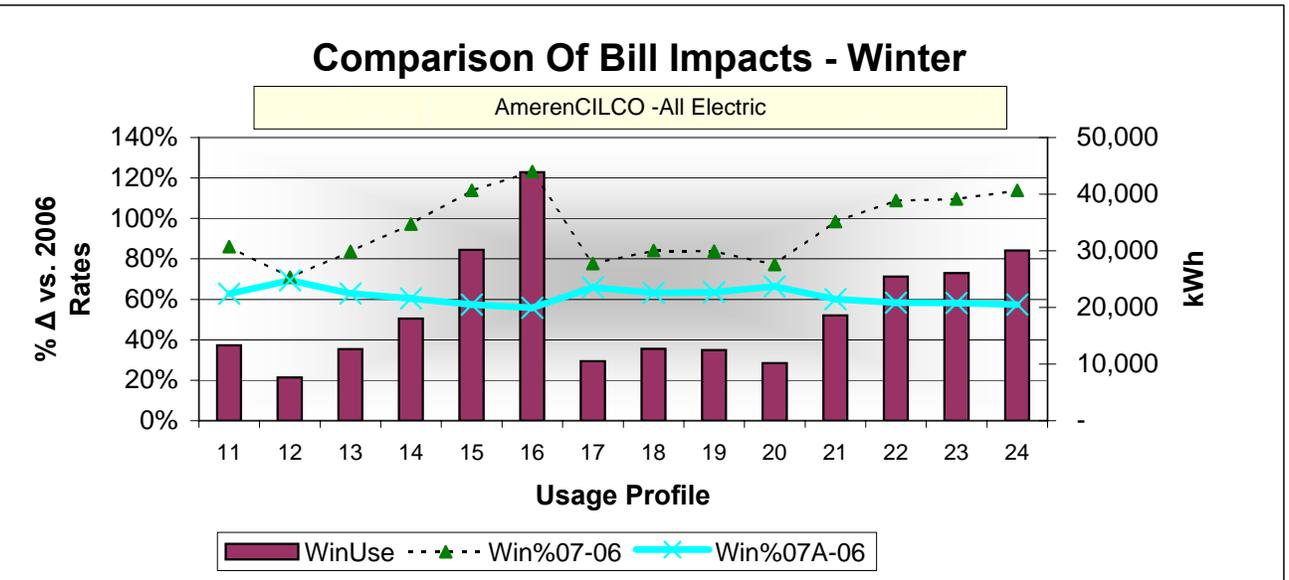
### Comparison Of Bill Impacts - Annual



### Comparison Of Bill Impacts - Summer

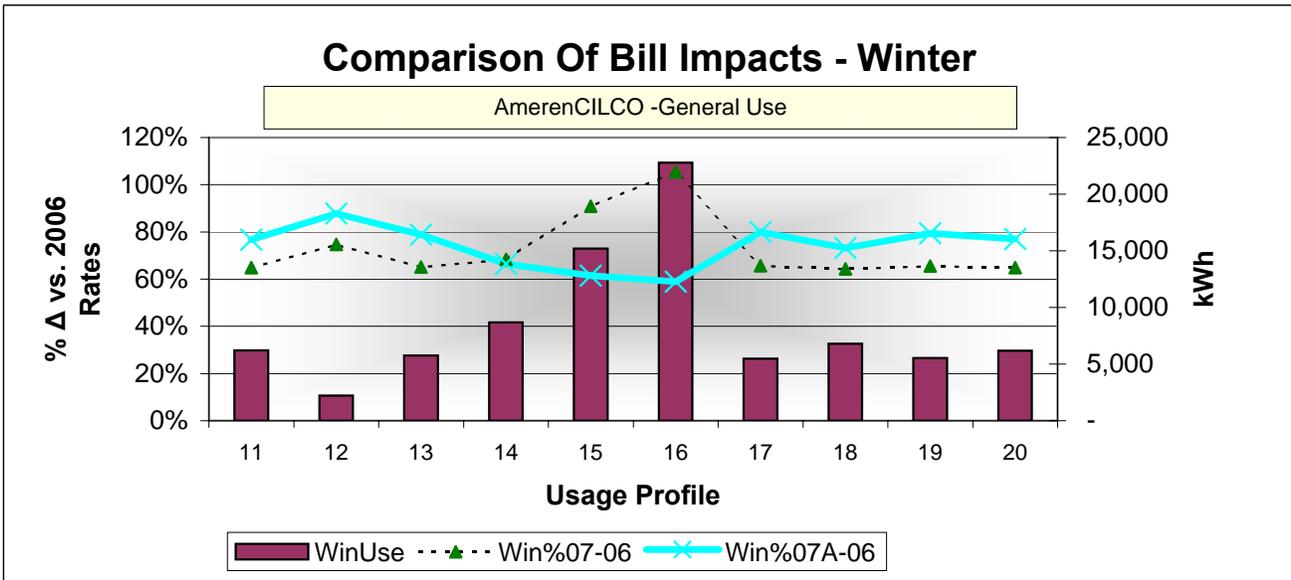
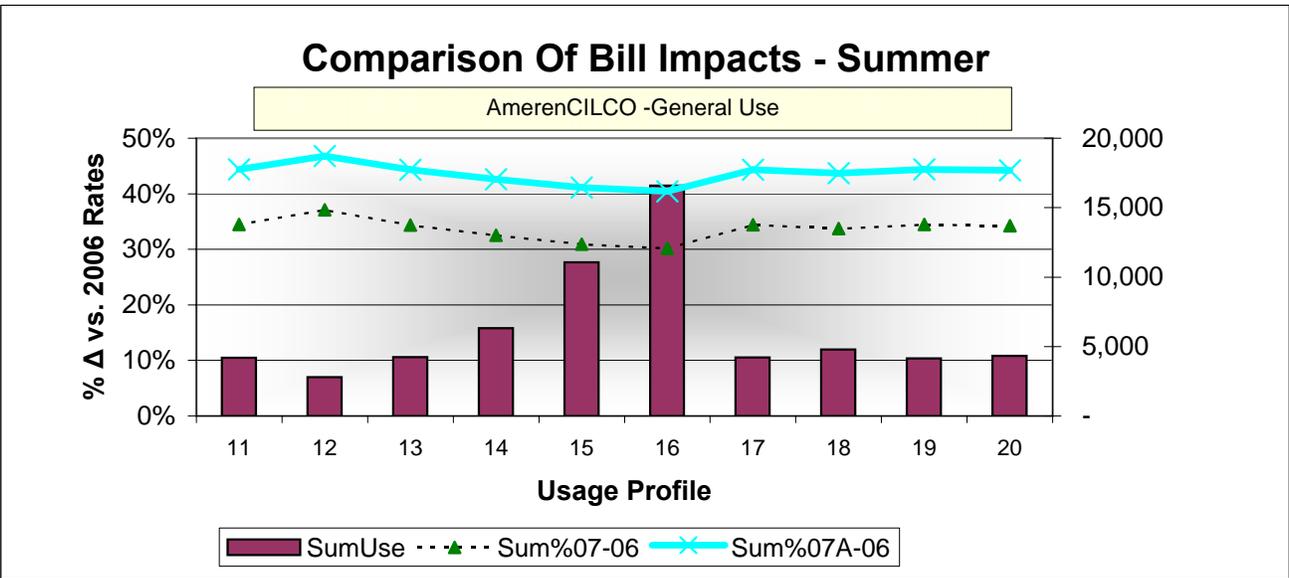
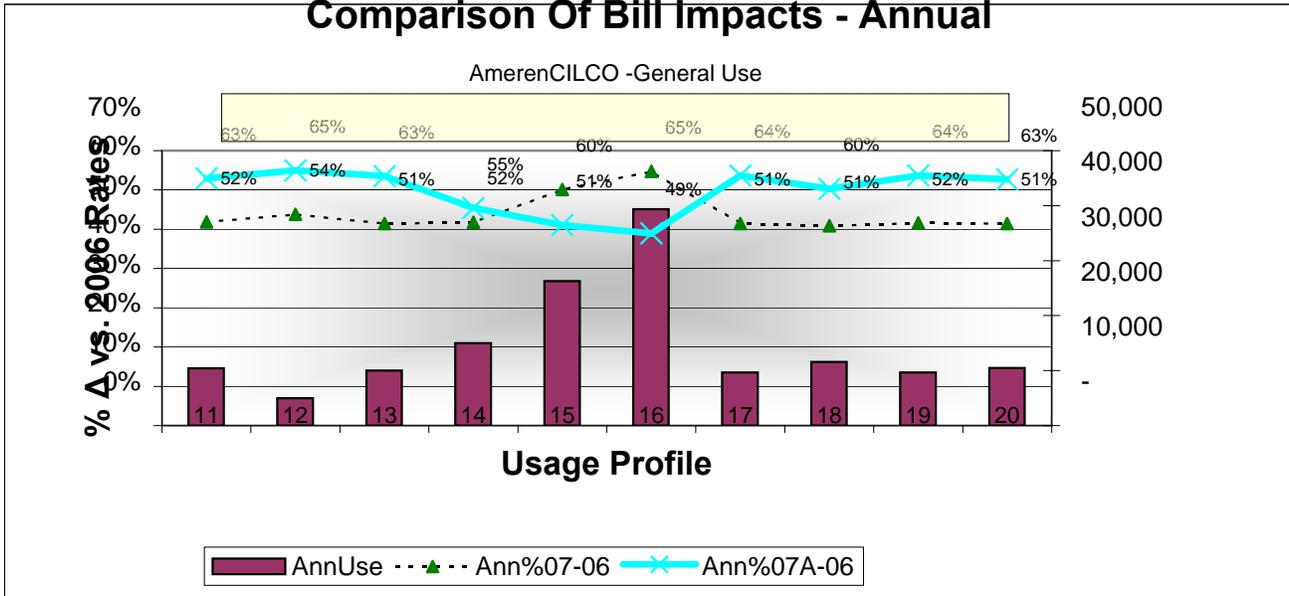


### Comparison Of Bill Impacts - Winter



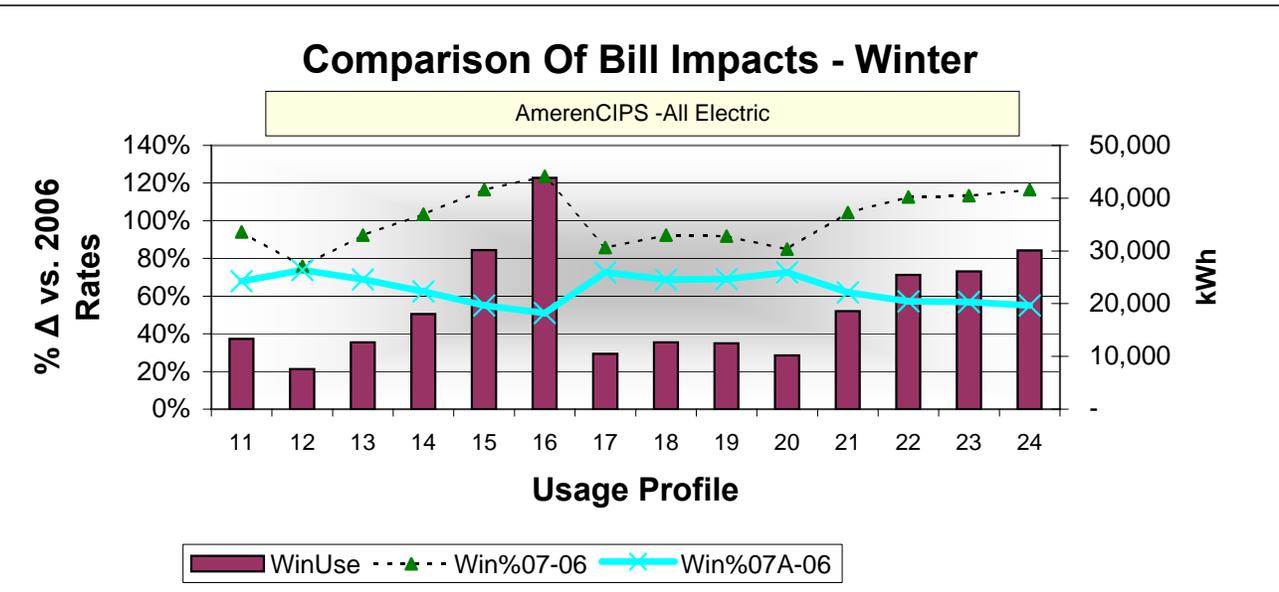
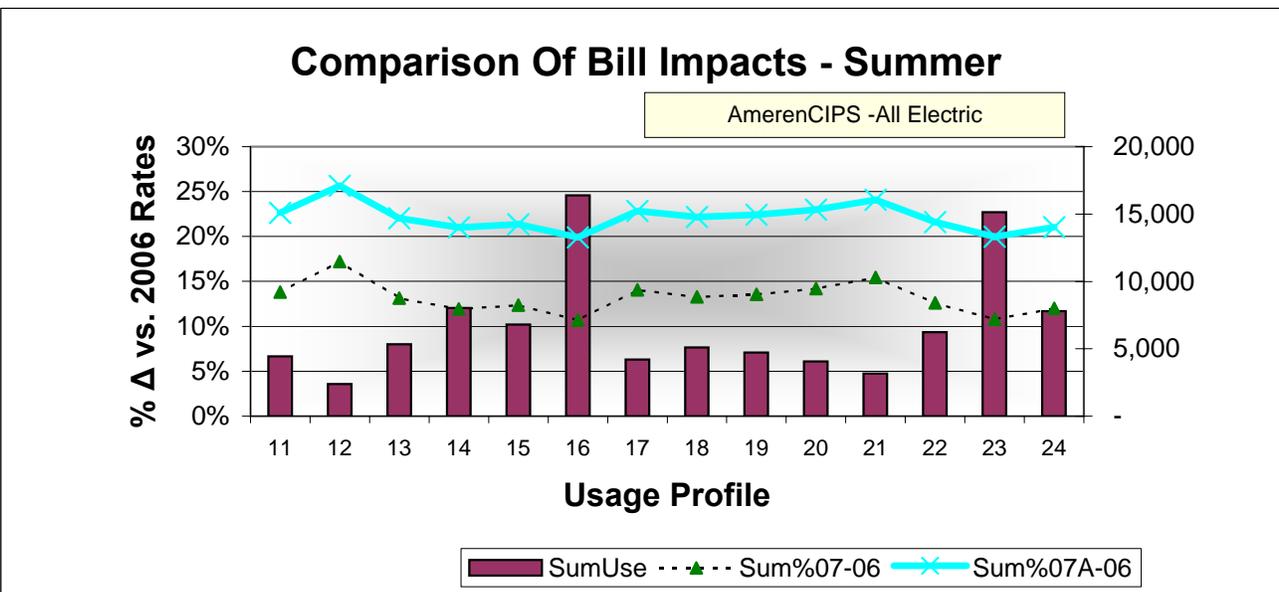
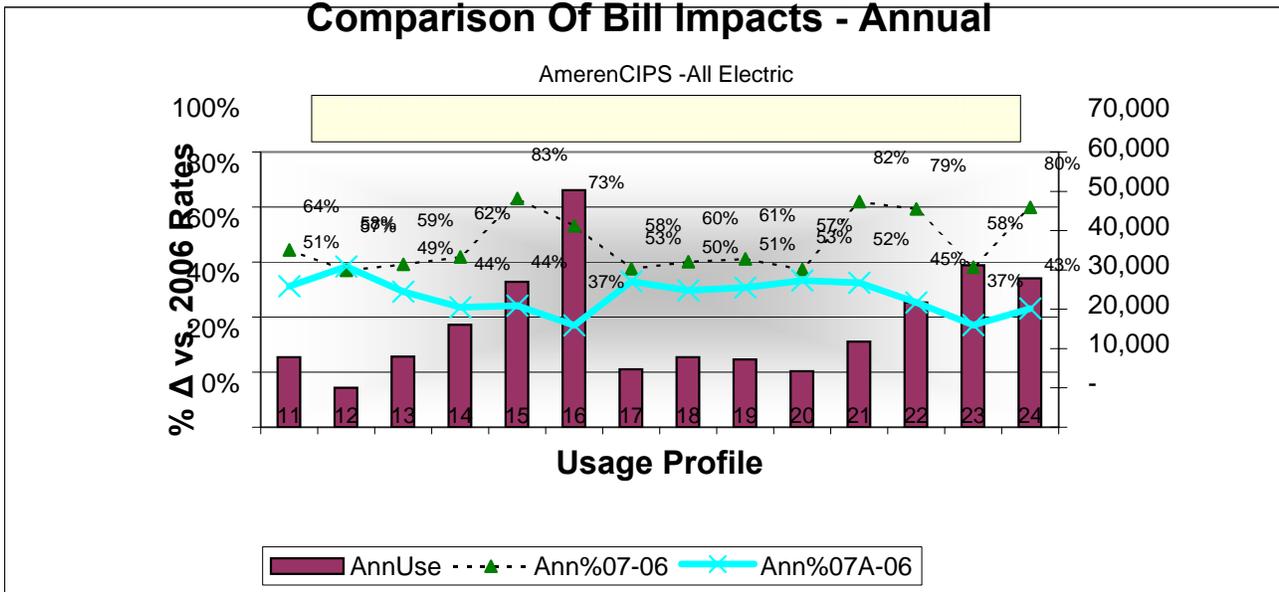
**Ameren Illinois Utilities  
Comparison of Residential Bill Impacts**

**Comparison Of Bill Impacts - Annual**



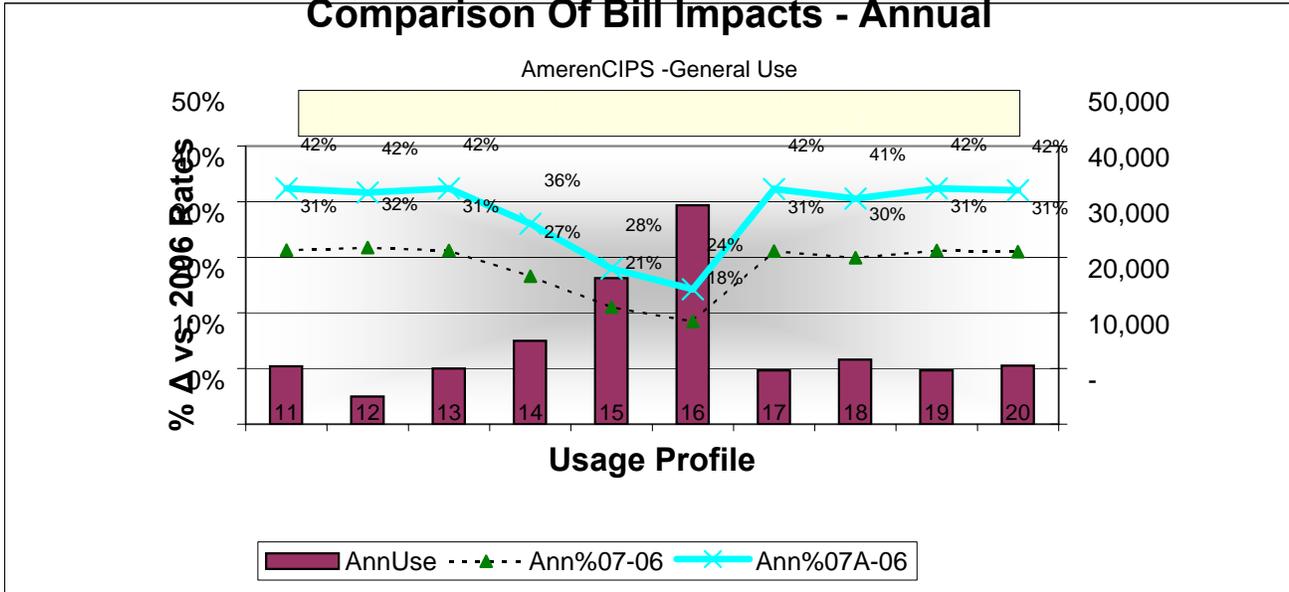
**Ameren Illinois Utilities  
 Comparison of Residential Bill Impacts**

**Comparison Of Bill Impacts - Annual**

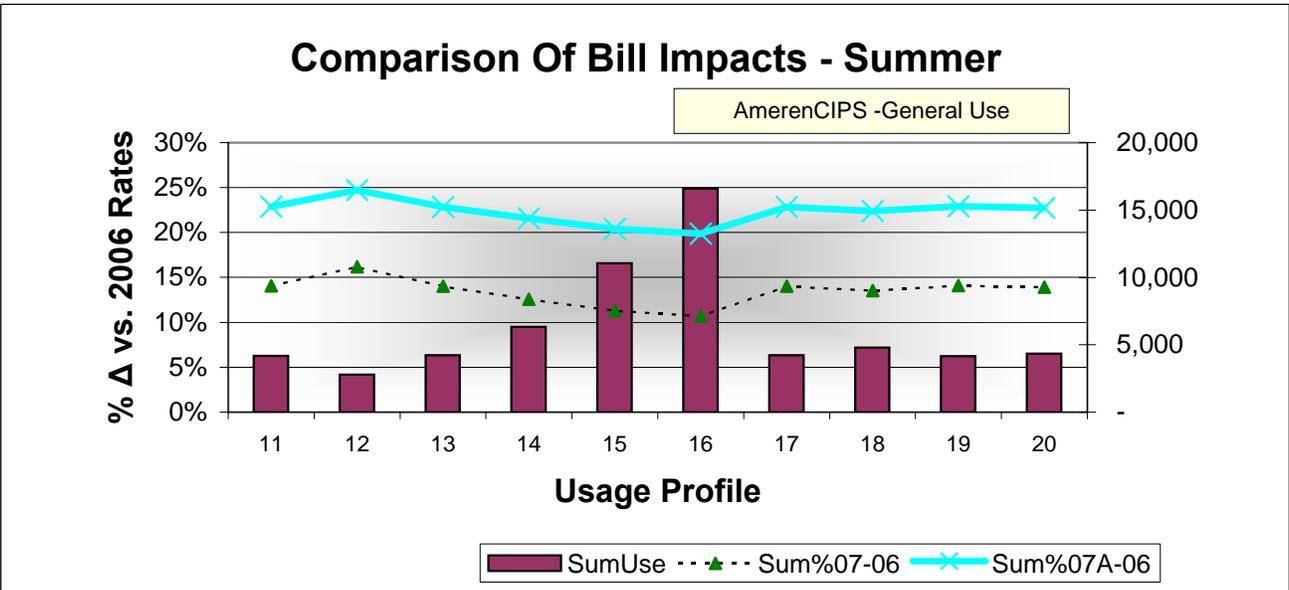


**Ameren Illinois Utilities  
Comparison of Residential Bill Impacts**

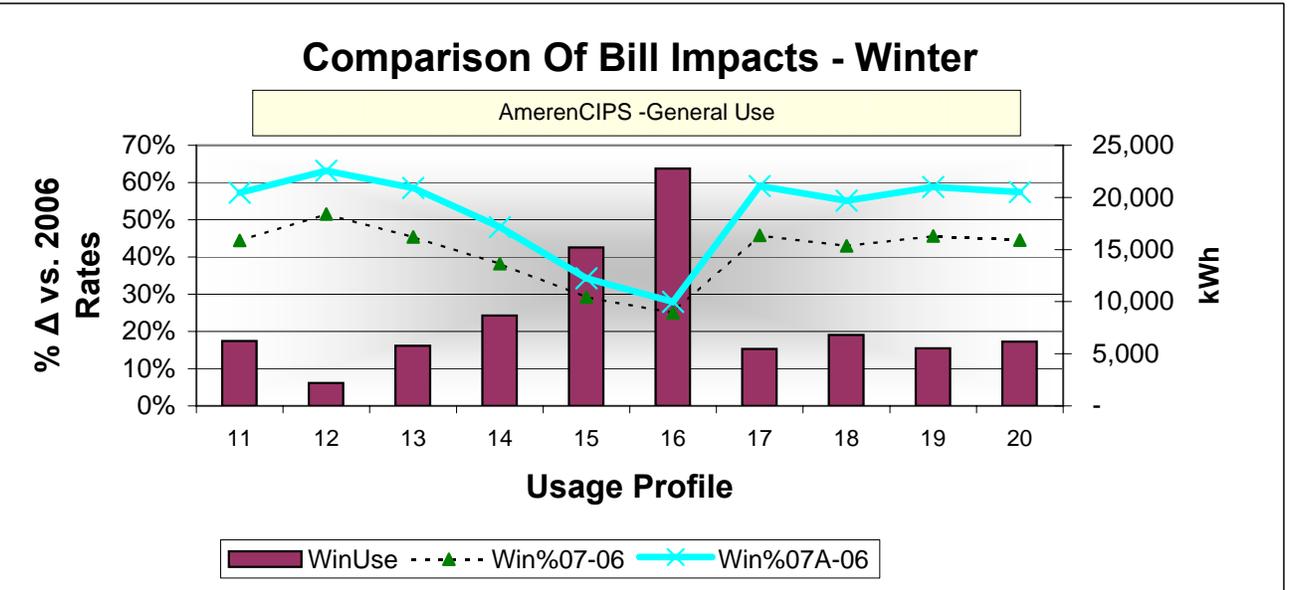
**Comparison Of Bill Impacts - Annual**



**Comparison Of Bill Impacts - Summer**



**Comparison Of Bill Impacts - Winter**



**AmerenIP - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2006-2007 Percent Increase	Rate 10 Sm Use Gen Elec Svc - 1 Ph	Rate 10 Sm Use Gen Elec Svc - 1 Ph - Spc Ht	Rate 10 Sm Use Gen Elec Svc - 3 Ph	Rate 10 Sm Use Gen Elec Svc - 3 Ph - Spc Ht	Rate 11 Dmd Mtr Gen Svc - 1 Ph-Sec	Rate 11 Dmd Mtr Gen Svc - 1 Ph-Sec-Spc Ht	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Prim	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Prim-Spc Ht	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Sec	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Sec-Spc Ht	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Sub Tr	Rate 11 Dmd Mtr Gen Svc - 3 Ph-Sub Tr-Spc Ht	Rate 12 Grain Drying - Primary	Rate 12 Grain Drying - Secondary
AmerenIP	DS2	-55% - 0%	7711	360	2068	77	1995	87	55	9	2488	104	2	0	0	73
AmerenIP	DS2	0%-25%	9137	500	2109	88	5827	493	29	2	6910	639	1	1	0	20
AmerenIP	DS2	+25%-50%	5372	654	1435	140	3354	307	19	4	4320	654	0	0	1	15
AmerenIP	DS2	+50%-75%	1803	498	613	90	677	48	1	0	685	81	0	0	0	4
AmerenIP	DS2	+75%-	346	161	138	57	13	5	0	0	10	7	0	0	0	0
AmerenIP	DS2	+ 100%	50	70	28	21	3	0	0	0	11	1	0	0	0	0
Total			24419	2243	6391	473	11869	940	104	15	14424	1486	3	1	1	112

**Percent of Total**

AmerenIP	DS2	-55% - 0%	31.6%	16.0%	32.4%	16.3%	16.8%	9.3%	52.9%	60.0%	17.2%	7.0%	66.7%	0.0%	0.0%	65.2%
AmerenIP	DS2	0%-25%	37.4%	22.3%	33.0%	18.6%	49.1%	52.4%	27.9%	13.3%	47.9%	43.0%	33.3%	100.0%	0.0%	17.9%
AmerenIP	DS2	+25%-50%	22.0%	29.2%	22.5%	29.6%	28.3%	32.7%	18.3%	26.7%	30.0%	44.0%	0.0%	0.0%	100.0%	13.4%
AmerenIP	DS2	+50%-75%	7.4%	22.2%	9.6%	19.0%	5.7%	5.1%	1.0%	0.0%	4.7%	5.5%	0.0%	0.0%	0.0%	3.6%
AmerenIP	DS2	+75%-	1.4%	7.2%	2.2%	12.1%	0.1%	0.5%	0.0%	0.0%	0.1%	0.5%	0.0%	0.0%	0.0%	0.0%
AmerenIP	DS2	+ 100%	0.2%	3.1%	0.4%	4.4%	0.0%	0.0%	0.0%	0.0%	0.1%	0.1%	0.0%	0.0%	0.0%	0.0%

Notes:

Excludes customers with usage under 600 kwhr/year

Includes Customers with less than 12 months of billing data

**AmerenCIPS(Except ME and HH) - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2006-2007 Percent Increase	Rate 9T Light and Power CATV	Rate 9T Light and Power CATV - No Meter	Rate 9T Light and Power TOU Pri_ Unregulated	Rate 9T Light and Power TOU Primary Regulated	Rate 9T Light and Power TOU Secondary	Rate 9T Light and Power TOU Sub-Transmission	Rate 9T Light and Power TOU Transmission	Rate 9T Lt & Pwr TOU Spc Ht Prim Unregulated	Rate 9T Lt & Pwr TOU Spc Ht Primary Regulated	Rate 9T Lt & Pwr TOU Spc Ht Secondary
AmerenCIPS	DS2	-55% - 0%	1	0	0	1	116	0	0	0	0	18
AmerenCIPS	DS2	0%-25%	0	0	0	2	548	0	0	0	1	64
AmerenCIPS	DS2	+25%-50%	0	0	0	4	1354	0	0	0	2	181
AmerenCIPS	DS2	+50%-75%	5	0	1	19	795	1	1	0	3	248
AmerenCIPS	DS2	+75%-100%	12	6	1	31	76	0	0	1	5	29
AmerenCIPS	DS2	+ 100%	0	0	1	37	24	0	0	2	4	2
Total			18	6	3	94	2913	1	1	3	15	542

**Percent of Total**

AmerenCIPS	DS2	-55% - 0%	5.6%	0.0%	0.0%	1.1%	4.0%	0.0%	0.0%	0.0%	0.0%	3.3%
AmerenCIPS	DS2	0%-25%	0.0%	0.0%	0.0%	2.1%	18.8%	0.0%	0.0%	0.0%	6.7%	11.8%
AmerenCIPS	DS2	+25%-50%	0.0%	0.0%	0.0%	4.3%	46.5%	0.0%	0.0%	0.0%	13.3%	33.4%
AmerenCIPS	DS2	+50%-75%	27.8%	0.0%	33.3%	20.2%	27.3%	100.0%	100.0%	0.0%	20.0%	45.8%
AmerenCIPS	DS2	+75%-100%	66.7%	100.0%	33.3%	33.0%	2.6%	0.0%	0.0%	33.3%	33.3%	5.4%
AmerenCIPS	DS2	+ 100%	0.0%	0.0%	33.3%	39.4%	0.8%	0.0%	0.0%	66.7%	26.7%	0.4%

Notes:

Excludes customers with usage under 600 kwhr/year  
 Includes Customers with less than 12 months of billing data

**AmerenCIPS-ME - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2006-2007 Percent Increase	Rate 2 Sm Gen El Svc-Unmetrd w/o Cust Chg	Rate 2 Small Gen Elec Svc - Demand	Rate 2 Small Gen Elec Svc - No Demand	Rate 2 Small Gen Electric Svc-Unmetered	Rate 3 Large General Electric Service TOU	Rate 4 Primary Electric Service TOU
AmerenCIPS-ME	DS2	-55% - 0%	0	0	5	0	21	2
AmerenCIPS-ME	DS2	0%-25%	0	12	1260	26	15	3
AmerenCIPS-ME	DS2	+25%-50%	0	173	3280	283	22	1
AmerenCIPS-ME	DS2	+50%-75%	42	113	1154	0	23	0
AmerenCIPS-ME	DS2	+75%-100%	1	10	174	0	13	0
AmerenCIPS-ME	DS2	+ 100%	1	22	110	0	5	0
Total			44	330	5983	309	99	6

**Percent of Total**

AmerenCIPS-ME	DS2	-55% - 0%	0.0%	0.0%	0.1%	0.0%	21.2%	33.3%
AmerenCIPS-ME	DS2	0%-25%	0.0%	3.6%	21.1%	8.4%	15.2%	50.0%
AmerenCIPS-ME	DS2	+25%-50%	0.0%	52.4%	54.8%	91.6%	22.2%	16.7%
AmerenCIPS-ME	DS2	+50%-75%	95.5%	34.2%	19.3%	0.0%	23.2%	0.0%
AmerenCIPS-ME	DS2	+75%-100%	2.3%	3.0%	2.9%	0.0%	13.1%	0.0%
AmerenCIPS-ME	DS2	+ 100%	2.3%	6.7%	1.8%	0.0%	5.1%	0.0%

Notes:

Excludes customers with usage under 600 kwhr/year

Includes Customers with less than 12 months of billing data

**AmerenCIPS-HH - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2006-2007 Percent Increase	SC 2 Small General Service	SC 2 Small General Service - CATV No Meter	SC 3 Large General Service
AmerenCIPS-HH	DS2	-30% - 0%	69	0	0
AmerenCIPS-HH	DS2	+0%-25%	321	1	0
AmerenCIPS-HH	DS2	+25%-50%	144	5	1
AmerenCIPS-HH	DS2	+50%-75%	19	0	0
AmerenCIPS-HH	DS2	+75%-100%	7	0	0
AmerenCIPS-HH	DS2	+ 100%	0	0	0
Total			560	6	1

**Percent of Total**

AmerenCIPS-HH	DS2	-30% - 0%	12.3%	0.0%	0.0%
AmerenCIPS-HH	DS2	+0%-25%	57.3%	16.7%	0.0%
AmerenCIPS-HH	DS2	+25%-50%	25.7%	83.3%	100.0%
AmerenCIPS-HH	DS2	+50%-75%	3.4%	0.0%	0.0%
AmerenCIPS-HH	DS2	+75%-90%	1.3%	0.0%	0.0%
AmerenCIPS-HH	DS2	+ 90%	0.0%	0.0%	0.0%

Notes:

Excludes customers with usage under 600 kwhr/year  
 Includes Customers with less than 12 months of billing data

**AmerenCILCO - DS2 - Distribution of Increases by 2006 Bundled Rate**

Company	NewDSName	2006-2007 Percent Increase	Rate 13 Gen Elec Svc Primary	Rate 13 Gen Elec Svc Primary - TOD	Rate 13 Gen Elec Svc Secondary	Rate 13 Gen Elec Svc Secondary - No Dmd Mtr	Rate 13 Gen Elec Svc Secondary - Power Pack	Rate 13 Gen Elec Svc Secondary - TOD	Rate 22 Limited Off-Pk Svc - Secondary
AmerenCILCO	DS2	-55% - 0%	1	0	1082	6	0	36	0
AmerenCILCO	DS2	0%-25%	7	0	5111	435	0	109	0
AmerenCILCO	DS2	+25%-50%	5	0	8559	1639	4	52	0
AmerenCILCO	DS2	+50%-75%	3	0	3140	252	16	29	0
AmerenCILCO	DS2	+75%-100%	1	0	761	112	256	8	2
AmerenCILCO	DS2	+ 100%	3	1	277	80	26	15	93
Total			20	1	18930	2524	302	249	95

**Percent of Total**

AmerenCILCO	DS2	-55% - 0%	5.0%		5.7%	0.2%	0.0%	14.5%	0.0%
AmerenCILCO	DS2	0%-25%	35.0%		27.0%	17.2%	0.0%	43.8%	0.0%
AmerenCILCO	DS2	+25%-50%	25.0%		45.2%	64.9%	1.3%	20.9%	0.0%
AmerenCILCO	DS2	+50%-75%	15.0%		16.6%	10.0%	5.3%	11.6%	0.0%
AmerenCILCO	DS2	+75%-100%	5.0%		4.0%	4.4%	84.8%	3.2%	2.1%
AmerenCILCO	DS2	+ 100%	15.0%		1.5%	3.2%	8.6%	6.0%	97.9%

Notes:

Excludes customers with usage under 600 kwhr/year

Includes Customers with less than 12 months of billing data