

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

<b>Illinois Commerce Commission</b>	)	
<b>On its own motion</b>	)	
	)	
<b>v.</b>	)	
	)	<b>Docket No. 07-0165</b>
<b>Central Illinois Light Company,</b>	)	
<b>d/b/a AmerenCILCO;</b>	)	
<b>Central Illinois Public Service Company,</b>	)	
<b>d/b/a AmerenCIPS;</b>	)	
<b>and Illinois Power Company d/b/a AmerenIP</b>	)	
	)	
<b>Investigation pursuant to Section</b>	)	
<b>9-250 of the Public Utilities Act of</b>	)	
<b>Electric Rate Design.</b>	)	

**AMEREN ILLINOIS UTILITIES’  
MOTION FOR LEAVE TO FILE SUPPLEMENTAL BRIEFS**

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 (the “Ameren Illinois Utilities”) hereby request that the Administrative Law Judge (“ALJ”) grant leave to all parties to file a simultaneous supplemental brief addressing the effect of legislation recently adopted by the Illinois General Assembly and awaiting the Governor’s signature. This Motion requests the same relief as requested by motion of Commonwealth Edison (“ComEd”) in 07-0166, on July 27, 2007. In support of this Motion, the Ameren Illinois Utilities state as follows:

1. On March 2, 2007, the Commission initiated this Docket to consider whether the design of the Ameren Illinois Utilities’ electric rates should be changed. Initiating Order, Docket 07-0165, at 4. These Rates included supply charges that were set in the 2006 Illinois Auction, as approved in the Ameren Illinois Utilities’ procurement case (Docket 05-0160, -0161, -0162). *Id.* at 1-2.

2. In this Docket, parties conducted workshops and submitted testimony regarding various aspects of the Ameren Illinois Utilities' rate design. After cross-examination was waived, testimony was admitted into evidence, and the record was marked "heard and taken." Parties thereafter filed initial post-hearing briefs on June 29, 2007, and reply briefs on July 10, 2007.

3. Both houses of the Illinois General Assembly have now approved legislation implementing a recently announced multi-party agreement concerning electric procurement and rate relief. *See* S.B. 1592, House Amendments 5 & 6.<sup>1</sup> The Governor has publicly stated that he will sign this bill into law. The legislation makes significant changes in the system by which major Illinois utilities procure energy, as well as in rates and characteristics of utility service available to various groups of customers. As a result of these changes, many of the issues in this Docket – which assumed the continuing use of the auction procurement process and the post-transition rates – may now be either moot or materially altered.

4. Given these new circumstances, the Ameren Illinois Utilities request that parties have the opportunity to file a supplemental brief regarding the impact of the new legislation on the issues in this Docket. As suggested by ComEd, in its similar motion, the Ameren Illinois Utilities agree that such filings should be brief and that seven pages of text would be reasonable. The Ameren Illinois Utilities believe that this filing would aid the Commission in reaching a determination in this Docket.

6. No party would be prejudiced by the granting of this Motion, as each party would have an opportunity to file a supplemental brief of the same length within the same substantive parameters on the same schedule.

---

<sup>1</sup> Legislative action by both houses is reflected on the General Assembly's official web site at the URL: <http://www.ilga.gov/legislation/BillStatus.asp?DocNum=1592&GAID=9&DocTypeID=SB&LegId=29675&SessionID=51&GA=95>.

WHEREFORE, the Ameren Illinois Utilities respectfully request that the ALJ grant this Motion and allow all parties leave to file a supplemental brief of no more than seven pages in length discussing the effect of the aforementioned legislation, within seven days of the effective date of such legislation.

Dated: July 30, 2007

CENTRAL ILLINOIS LIGHT COMPANY  
d/b/a AmerenCILCO, CENTRAL ILLINOIS  
PUBLIC SERVICE COMPANY d/b/a  
AmerenCIPS, ILLINOIS POWER  
COMPANY d/b/a AmerenIP

by: /s/ Laura M. Earl

Christopher W. Flynn  
E-mail: cwflynn@jonesday.com  
Laura M. Earl  
E-mail: learl@jonesday.com  
JONES DAY  
77 West Wacker  
Chicago, IL 60601-1692  
Telephone: (312) 782-3939  
Facsimile: (312) 782-8585

Edward C. Fitzhenry  
E-mail: efitzhenry@ameren.com  
AMEREN SERVICES COMPANY  
One Ameren Plaza  
1901 Chouteau Avenue  
P.O. Box 66149, MC 1310  
St. Louis, Missouri 63166-6149  
Telephone: (314) 554-3533  
Facsimile: (314) 554-4014

**CERTIFICATE OF SERVICE**

I, Laura M. Earl, certify that on July 30, 2007, I served a copy of the foregoing Ameren Illinois Utilities' Motion for Leave to File Supplemental Briefs by electronic mail to the individuals on the Commission's Service List for Docket 07-0165.

/s/ Laura M. Earl  
Laura M. Earl  
Attorney for the Ameren Illinois Utilities