

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

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

**AMEREN ILLINOIS UTILITIES’
MOTION TO ADMIT LATE-FILED EXHIBITS INSTANTER**

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 move the Administrative Law Judge (“ALJ”) to admit late-filed exhibits into evidence, pursuant to 83 Ill. Admin. Code §§200.190 and 200.875(c). The attached exhibits address the effect of legislation recently adopted by the Illinois General Assembly and awaiting the Governor’s signature, and are referenced in the simultaneously filed Ameren Illinois Utilities’ Brief on Exceptions, in accordance with the ALJ’s Order of August 1, 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. The Initiating Order noted that it had received complaints from customers that the bills were much higher than anticipated and noted the hardships being created, saying that “an investigation should be initiated..., with a view toward ordering any changes in rate design the Commission determines on the basis of the record to be necessary to make the rate structure of

each of these utilities, with appropriate consideration of historic rate structures of the companies, more just and reasonable than the rate structure in effect as of March 2, 2007.” (Initiating Order, p. 4.)

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) During the pendency of this docket, negotiations have proceeded in the Illinois General Assembly, which have addressed many of the same rate relief issues as have been addressed in this Docket. Now, both houses of the Illinois General Assembly have approved legislation implementing a recently announced multi-party agreement concerning electric procurement and rate relief. *See* S.B. 1592, House Amendments 5 & 6.¹ 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. Ameren Illinois Utilities’ customers will significantly benefit from negotiated rate relief stemming from this pending legislation.

4) Given these new circumstances, the Ameren Illinois Utilities move for leave to file exhibits showing the effect of the legislative rate relief on customers’ bills, with and without rate relief as provided in the proposed order. Ameren Illinois Utilities’ Exhibit 4.1 (supported by Ameren Illinois Utilities’ Exhibit 4.0, the affidavit of Leonard M. Jones) shows bill estimates for legislative rate relief and rate redesign relief (as set forth in the Proposed Order), with separate

¹ 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>.

and joint bill impacts, as compared with 2006 electricity rates. The Ameren Illinois Utilities believe that this filing would aid the Commission in reaching a determination in this Docket.

5) No party would be prejudiced by the granting of this Motion; rather, parties and the Commission will benefit from a full and complete record in this Docket. The attached exhibits will aid the ALJs and the Commission in rendering a well-informed and supported opinion.

WHEREFORE, the Ameren Illinois Utilities respectfully request that the ALJ grant this Motion and admit the attached Ameren Illinois Exhibits 4.0 and 4.1 into the evidentiary record.

Dated: August 8, 2007

Respectfully submitted,

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

By: /s/ Laura M. Earl
One of their attorneys
Christopher W. Flynn
Laura M. Earl
JONES DAY
77 West Wacker Drive
Chicago, IL 60601-1692
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
cwflynn@joneday.com
learl@jonesday.com

Edward C. Fitzhenry
Managing Associate General Counsel
Matthew R. Tomc
Associate General Counsel
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, Missouri 63166
Telephone: (314) 554-3533
Facsimile: (314) 554-4014
efitzhenry@ameren.com
mtomc@ameren.com

CERTIFICATE OF SERVICE

I, Laura M. Earl, certify that on August 8, 2007, I served a copy of the foregoing Motion for Leave to File and to Admit Late-Filed Exhibits Instantly by electronic mail to the individuals on the Commission's official Service List for Docket 07-0165.

/s/ Laura M. Earl

Laura M. Earl