

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT COMPANY)	
d/b/a AMERENCILCO,)	
)	
Petitioner.)	Docket No. 07-0585
)	
)	
Proposed general increase in rates for delivery)	
service. (Tariffs filed November 2, 2007))	
)	

MOTION TO CONSOLIDATE DOCKETS

Central Illinois Light Company (“AmerenCILCO”), joined by Central Illinois Public Service Company (“AmerenCIPS”) and Illinois Power Company (“AmerenIP”) (together, the “Ameren Illinois Utilities”), hereby moves for entry of an order consolidating Commission Dockets numbered 07-0585, 07-0586, 07-0587, 07-0588, 07-0589, and 07-0590 (together, the “Tariff Dockets”), pursuant to Section 200.600 of the Illinois Administrative Code (the “Code”).¹ In support of this motion, AmerenCILCO states as follows:

Introduction

1. Each of the Ameren Illinois Utilities is a corporation organized and existing under the laws of the State of Illinois, engaged in delivering electric energy to the public in Illinois, and is a public utility within the meaning of 220 ILCS 5/3-105 of the Public Utilities Act (the “Act”). Each of the Ameren Illinois Utilities is a subsidiary of Ameren Corporation.

2. On November 2, 2007, the Ameren Illinois Utilities each filed two sets of tariffs proposing a general increase in gas and electric rates (the “Proposed Tariffs”).

¹ Concurrent with the filing of this motion, each of the Ameren Illinois Utilities are filing similar, separate motions in each of their respective Dockets.

3. The Proposed Tariffs filed by Ameren CILCO, AmerenCIPS, and AmerenIP were suspended and docketed on December 5, 2007, under Commission Docket Nos. 07-0585, 07-0586, and 07-0587, for electric, and 07-0588, 07-0589, and 07-0590 for gas, respectively.

Consolidation of the Tariff Dockets Will Promote Commission Goals

4. Section 200.600 of the Code provides that “The Commission or Hearing Examiner may order two or more proceedings involving a similar question of law or fact to be consolidated where rights of the parties or the public interest will not be prejudiced by such procedure.” 83 Ill. Adm. Code § 200.600.

5. Illinois courts favor case consolidation to promote fairness, consistency, and judicial expediency, where cases involve the same questions of law and fact. *See, e.g., Boyd v. Travelers Ins. Co.*, 166 Ill.2d 188, 199-200, 652 N.E.2d 267, 273 (1995).

6. The Proposed Tariffs filed in Dockets 07-0585, 07-0586, 07-0587, 07-0588, 07-0589, and 07-0590 raise substantially similar questions of law and fact before the Commission. The Proposed Tariffs are supported by largely identical direct testimony provided by many of the same expert witnesses. The Commission will examine each of the Ameren Illinois Utilities’ Proposed Tariffs to determine whether their implementation will ensure “just and reasonable” retail rates.

7. The Ameren Illinois Utilities’ Proposed Tariffs will proceed along a parallel timeline and should each conclude by October 2007. Commission Staff will participate in all of the Tariff Dockets, as presumably will energy suppliers, customer groups and others. Consolidating the Tariff Dockets will accommodate all parties, Staff, and the ALJ, allowing better opportunity for those involved to participate efficiently in all dockets. Further, the ALJ would avoid hearing essentially the same testimony from the same witnesses on the same

subjects in separate dockets, thus conserving judicial resources and avoiding possible inconsistencies.

8. Thus, no rights will be prejudiced by consolidating the Tariff Dockets. Rather, consolidation of these Dockets will benefit the public, all parties, stakeholders, the ALJ, and the Commission, by streamlining the identical issues presented in each Docket.

9. Moreover, consolidation of the Tariff Dockets will promote the following Commission goals: (1) ensuring the integrity of the fact-finding process by assembling a “complete factual record to serve as a basis for a correct and legally sustainable decision,” 83 Ill. Admin. Code 200.25(a); (2) providing for an expeditious hearing process, in order to bring proceedings “to a conclusion as swiftly as is possible in keeping with the other goals of the hearing process,” 83 Ill. Admin. Code 200.25(c); (3) tailoring the hearing process “where practicable to accommodate the parties, Staff witnesses, the Hearing Examiner and the Commission itself,” 83 Ill. Admin. Code 200.25(d); and (4) promoting a cost-effective hearing process, in order to minimize “costs incurred by the Commission and by both public and private parties.” 83 Ill. Admin. Code 200.25(e).

WHEREFORE, for all the reasons set forth above, AmerenCILCO respectfully moves for entry of an order consolidating Dockets 07-0585, 07-0586, 07-0587, 07-0588, 07-0589, and 07-0590.

December 6, 2007

Respectfully submitted,

CENTRAL ILLINOIS LIGHT COMPANY
d/b/a AMERENCILCO

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PROOF OF SERVICE

I, Laura M. Earl, certify that on December 6, 2007, I served a copy of the foregoing Motion to Consolidate Dockets by electronic mail to the individuals on the Commission's Service List for Docket 07-0585.

/s/ Laura M. Earl

Laura M. Earl
Attorney for Movant