

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY)	
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Approval of the Energy Efficiency and Demand Response Plan)	Docket No. 07-0540
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**INITIAL BRIEF OF THE
ENVIRONMENTAL LAW & POLICY CENTER**

January 14, 2008

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Transformation. In the residential sector, the plan emphasizes lighting programs. HVAC diagnostic and tune-up programs have been popular in other states, but ComEd only has a small budget for these because it believes that the Total Resource Cost test limits it to consideration of only electricity savings, while HVAC programs typically deliver both gas and electric savings. In the commercial and industrial sector, the initial program focus is also on lighting in the context of the Prescriptive and Custom programs. Additionally, it encourages installation of energy efficient motors and other non-lighting measures.

While the Plan outlines a number of different programs, it provides limited details on implementation. For example, ComEd plans to emphasize in-store coupons and incentives to retailers as a part of the residential lighting programs. However, the company provides few details beyond this. Due to the short time to develop such details, ComEd requests flexibility in such implementation, including the flexibility to shift funds from one program to another.

Another issue that stands out in reviewing the Plan is that all of the information at its foundation comes from California and other states. While much of that information may be relevant to Illinois, until ComEd and Ameren do further Illinois-specific analysis, we will not have the information we need to modify these programs to ensure optimal results in Illinois. During the Ameren hearing it became clear that ComEd and Ameren had funded a report that provides Illinois specific information (discussed below). However, that report was not provided to parties therefore, we do not know whether it would have influenced this proceeding.

An important element in ongoing development and success of the programs is input from the environmental and consumer interests. ComEd and Ameren have both agreed to implement a stakeholder processes, but the scope and structure of the process remains a critical issue that the

Commission must address to ensure adequate public participation in these ratepayer funded programs.

ARGUMENT

The Program before the Commission today represents a historic first step towards reducing our electricity use, reducing green house gas and other emissions, and reducing customers' bills. When properly implemented, energy efficiency programs have the potential to produce significant environmental and economic benefits. However, proper implementation is not a given, and the stakeholders and the Commission must be vigilant in assuring that the programs deliver maximum achievable savings to all customer classes.

SB 1592 required ComEd to file its Energy Efficiency and Demand Response Plan ("Energy Efficiency Plan" or "Plan") by November 15, 2007 and required the Commission to issue a ruling on the plans in only three months. The time constraints on this process made it difficult on all parties and ComEd's plan has to be considered in that context. That being said, regardless of time constraints, the Commission's decisions must be based on the record in the case.

ComEd has delivered a comprehensive plan and has stated its willingness to work with stakeholders to refine the plan going forward. That being said, ComEd's initial actions belie that commitment. ComEd failed to produce an important study, "Re-Energizing Illinois, Building Real Demand for Energy Efficiency," that is seemingly the only study that contains relevant information regarding appliance saturation levels and customer attitudes regarding efficiency as we head into the program. ELPC requested any such studies, and ComEd submitted that it had no such information. ComEd Response to ELPC DR 1.34 At this point, the record does not reflect

why ComEd withheld the study, but it certainly raises questions regarding the credibility of its testimony.

While legislation requires approval of a plan that the utilities get started on, it does not prevent the Commission from leaving some issues open until we have better information. This is consistent with ComEd's own request for flexibility in implementation. Additionally, when it comes to measurement of the actual savings in the program, the Company has not met its burden of proof that the Commission should allow it to rely on deemed savings.

I. THE COMMISSION SHOULD MANDATE A STATEWIDE PUBLIC EDUCATION PROGRAM

Given the historical absence of significant energy efficiency programs in Illinois, customer education, for all customer classes, is a critical element of program success. ELPC witness Geoffrey Crandall testifies:

There is a definite need to build customer awareness of energy efficiency options and financial savings that result from conservation and efficiency. General background information using mass media can complement the specific program offerings. Customers need to be aware of both the energy impact of appliance purchase decisions and opportunities to save energy through simple lifestyle changes such as adjusting the thermostat.

ELPC Ex.1.0 at 7. Essentially, public education should serve two purposes. It should help build interest for the individual programs, and it should also spread the broader message that energy efficiency can both save money and protect the environment.

ComEd witness Brandt, in his direct testimony, states that in meeting the statutory objectives of the program and its own objectives, the program must:

- Maximiz[e] the capture of cost-effective energy efficiency subject to spending gaps <and>
- Lay a solid foundation for energy efficiency programs going forward by investing in the program infrastructure needed to support comprehensive and integrated approaches to energy efficiency and demand response.

ComEd Ex. 2.0 at 13 , line 309. More specifically, ComEd Witness Brandt states, “they will also emphasize customer education with the goal of moving customers to more comprehensive “whole home” solutions.” ComEd Ex. 2.0 at 23. Consistent with Mr. Brandt’s testimony, this statewide branding and educational program is critical to, “maximizing the energy efficiency capture” and is an important part of the “solid foundation and program infrastructure.

As a starting point for public education, ELPC supports a uniform statewide branding program. Mr. Crandall testifies:

Branding is an important part of the long-term success of this program. Programs such as Wisconsin’s *Focus on Energy* or California’s *Flex Your Power* campaign enhance consumer awareness of both specific program offerings and the opportunities for energy efficiency in general. Although there are three separate entities running programs in the state (ComEd, Ameren and DCEO), I believe that the programs would be enhanced by a unified brand and marketing campaign supported by all three.

ELPC Ex. 1.0 at 6, line 172. Additionally, Crandall supports the creation of a statewide Web site connected with the branding, where consumers can go for all of their energy efficiency information. He proposes that this site be similar to the California and Wisconsin sites (www.fypower.org and www.focusonenergy.org). *Id.*, line 178. NRDC similarly supports such a Web site. NRDC EX. 1.0 at 4. The statewide campaign and Web site cut across utility jurisdictions and send the important message that this is a statewide initiative that includes every customer.

ComEd is silent on the concept of a statewide branding program, but in regards to a statewide web site, Mr. Brandt states, “while a statewide energy efficiency web site may have some value, it is not necessary for the successful implementation of ComEd’s plan...ComEd already has a website (www.comedcare.com) that is dedicated to its customers and has a strong energy efficiency component.” ComEd Ex. 9.0 at 16.

While ComEd's website does in fact provide energy efficiency information, the Company also uses the web site to defend its rate increases during the period of 2006-2007, and promoted the site heavily during that period. These rate hikes proved highly unpopular with ComEd customers, and it calls into question whether customers will visit and/or trust the ComEd site when it comes to efficiency and conservation. If the Company chooses to do so, it can maintain its current website, but that should not be the place that the public education campaign sends consumers.

Finally, the Commission should ensure that the customer education program and web site are designed in conjunction with the stakeholder group. As Mr. Crandall notes, "This should be a coordinated effort involving ComEd, Ameren, DCEO and the collaborative working group, with proper safeguards to ensure that the focus is on energy efficiency and not image building for the utilities." ELPC Ex. 1.0 at 7. Given the recent promotional efforts by the utilities in favor of the rate increases, particularly the ComEd Cares program, the Commission needs to ensure that such safeguards are imposed to prevent the utilities spending ratepayer resources on image building rather than efficiency.

II. THE COMMISSION SHOULD ORDER COMED TO IMPLEMENT A STATEWIDE STAKEHOLDER PROCESS THAT ENSURES MEANINGFUL PARTICIPATION

Perhaps no element of the Plan is more important than the stakeholder process, as the Plan is truly a work in progress. Both of the utilities and all of the interveners agree on the need for such process and broad participation by stakeholders. Mr. Brandt notes, "ComEd believes that the stakeholder interaction to date has been of value to the overall process, and we envision the continued active involvement and input of stakeholders during Plan implementation through a collaborative process similar to that proposed by NRDC." ComEd Ex. 9.0 at 12, line 312.

However, closer review indicates that while ComEd supports a process similar to the NRDC proposal, significant differences remain.

ELPC believes the working group should focus on development of evaluation methods, review of program performance data, and adjustments of programs in accordance with such data. The group must be coordinated by an independent facilitator (preferably independently funded), meet regularly and use a reporting system that ensures accountability. Having an independent facilitator is critical to ensuring equitable stakeholder participation and helping the group move towards consensus.

NRDC outlines a framework for the stakeholder process in its Brief. ELPC has reviewed this process and supports it. Additionally, in order to be most effective, the stakeholder process should include a Technical Advisory Subgroup. This working group would be a sub-part of the main group, and would be limited in size to one representative from each utility, plus one representative from each major interest group (residential consumers, commercial and industrial consumers, building owners and environmentalists) and Staff. This group's responsibilities would include reviewing issues such as deeming values, data tracking and reporting, and proper implementation of approved programs. Limiting the size of this group and restricting participation to technical experts will create the right environment for review of the more technical elements of the programs that would be difficult to do in a larger group that included policy generalists and attorneys. The cost of funding this technical advisory sub-group should be included within the overall program budget and be a recoverable expense, with each representative receiving the same amount.

Another critical role for the stakeholder group is to check the ability of the utility to unilaterally dismiss the Evaluation, Measurement and Verification (EM&V) contractor. The

stakeholders should have to approve such dismissal in order to ensure the independence of the EM&V contractor's analysis. If the EM&V contractor can be unilaterally dismissed by the utility, it may unduly influence the findings.

A significant area of disagreement between interveners and the utilities is the need for a statewide stakeholder process. ELPC supports a statewide process for a number of reasons. First, while there will be some minor differences in the Ameren and ComEd programs, the plans they submitted are very similar. Ameren and ComEd both used the same consulting firm, ICF, to formulate their plans, and review of Mr. Jensen's Direct and Rebuttal Testimony indicates that his analysis and recommendation are nearly identical in both dockets.

A statewide process is much more efficient in terms of resources, and provides the opportunity to share experiences across utility borders. Both utilities should be using the same tracking and evaluation methods, and should be sharing information on results and adjustments to the programs. One process does not mean that Ameren and ComEd run identical programs in every respect, but it does mean that they, and ratepayers, benefit from the synergies. Finally, since the three entities (Ameren, ComEd and DCEO) are not competing for energy efficiency savings, there is no conflict in having a consolidated process.

Just as with customer education, Ameren opposes a statewide process, because of the differences between service territories. Again, this is unsupported by the record. Mr. Ogden merely summarizes points made by Mr. Voytas in his Rebuttal testimony regarding differences in the service territories. Those points are conclusory and unsupported by the record. Ameren Ex. 6.0 at 8.

III. THE COMMISSION SHOULD REJECT COMED'S REQUEST TO USE DEEMED VALUES FOR ACTUAL SAVINGS ANALYSIS OF THE PROGRAMS

In calculating savings to determine whether the company has met its goal, ComEd Witness Jensen proposes that the Commission rely on deemed values. “To ‘deem’ a value means that parties have agreed, or a commission has found, that there is sufficient existing information regarding the value of a variable that the value can be accepted as the basis for both planning purposes and evaluation.” ComEd Ex. 6.0 at 36, line 752. Specifically, Mr. Jensen recommends the Commission, “deem certain measure savings and NTG ratio values for the implementation and evaluation of the programs.” *Id.* at line 756.

Essentially, deeming values at the start of a program provides the utility with certainty at the outset of the program. *Id.* at line 794. However, before the Commission allows this, ComEd must justify the reasonableness of the values it adopts for deeming purposes. ELPC submits that the Company fails to meet its burden.

The deemed savings must be based on the difference between the usage of the old appliance (or lighting device and the usage of the new appliance). The deemed values ComEd proposes to use come from the California Database for Energy Efficiency Resources (DEER). However, in adopting the DEER values, Mr. Jensen fails to discuss whether relevant information from Illinois would influence the transferability and appropriateness of the DEER values. Presumably, no such information was available. When ELPC asked ComEd to supply any research it had regarding the saturation levels and vintages of appliances in Illinois, ComEd, in a response submitted by Mr. Jensen and Mr. Brandt, said that it had no such research. ComEd Response ELPC 1.34. In fact, we now know that such information existed and that both ComEd and Ameren possessed a report entitled “Re-energizing Illinois, Building Real Demand for Energy Efficiency” (March 2007), which contained significant information regarding the vintage

and saturation levels of appliances in ComEd's service territory. See, 07-0539 Tr. at 73-79.

ComEd helped fund the report, thus we know the Company possessed it.

Based on his data response, we know that Mr. Jensen did not see the report, but we do not know if his testimony would be affected had he reviewed it. In fact, this hole in the record makes it impossible for the Commission to evaluate ComEd's testimony on this issue. By virtue of the fact that ComEd has the burden of proof, the Commission must reject ComEd's position.

Similarly, in analyzing ComEd's Plan in relation to the statutory efficiency goals, the savings values must be based on the difference between baseline usage and costs vs. usage levels and costs in light of the program. Mr. Jensen states, "The values used in the ComEd portfolio ultimately were based on professional judgment, taking into account the experience of other utilities, the ComEd service territory and ComEd's level of experience related to specific programs." ComEd 6.0 at 27, line 564. Mr. Jensen adds:

For key program elements, such as the Residential Lighting element, we calculated the number of CFLs that would be needed to be acquired given our participation assumptions and compared this number with similarly sized utilities such as Southern California Edison and PG&E. For programs that we expected would play a smaller role in the portfolio initially, the participation assumptions were largely judgment-based, where the judgment was informed by ICF's and ComEd's understanding of the relative size of the market for a given program. Participation rates were set to reflect our collective judgment as to levels of participation that could be achieved given the design of the programs and the fact that the programs were essentially starting from scratch.

ComEd 6.0 at 27, line 570. Again, not knowing whether information from Re-Energizing Illinois would have influenced Mr. Jensen's conclusions, it cannot assume that his testimony is credible.

This calls into question the suggested Net-To-Gross ("NTG") values used in the calculation of "deemed values". The purpose behind the NTG calculation (typically calculated using post implementation impacts) is to adjust the gross program savings by both eliminating free riders (customers who would have taken action in the absence of the program) and including

free drivers (customers who have taken action(s) the program is attempting to motivate but do not take any incentives offered by the program). Eliminating free riders while including free drivers gives a more accurate picture of the actual results of the program.

As Staff Witness Zuraski points out, ComEd uses the same 0.8 NTG ratio for virtually every program, which “seems suspicious.” ICC Staff Ex. 1.0 at 31, line 717. He notes that the California Energy Commission Policy Manual, cited as the source for this value, considers 0.8 to be a default value. “[P]rogram proposals may utilize a default NTGR of 0.8 until such time as a new, more appropriate, value is determined in the course of a program evaluation.” *Id.* at line 734, citing CPUC “Energy Efficiency Policy Manual,” Version 2, Aug. 2003, p. 18-19. This explanation in the “Energy Efficiency Policy Manual” paints a vastly different picture than Mr. Jensen’s testimony, and certainly does not support the ICC allowing Ameren to use these deemed values for actual savings analysis.

Similarly, questions regarding the accuracy of ComEd’s NTG ratios used for the recycled refrigerator program demonstrate the danger of using these deemed values. The proposed net to gross ratios that have been suggested for the recycled refrigerator of .35 and .54 for recycled freezers are dubious and unsupported. Virtually all of the other NTG ratios ComEd uses for the other programs is .80. There is no explanation for why the NTG ratio for the refrigerator recycling program and freezer programs are so much lower. Moreover, it is unclear whether, under ComEd’s program, the implementer ensures that all replaced appliances are rendered inoperative (rather than resold and used by someone else), which would increase the savings value. Under ComEd’s proposal the low NTG ratio potentially underestimates savings, and would not be corrected when actual results become available after year one. Given that ComEd

customers ultimately pay for these programs, the Commission's goal should be to protect their interests by requiring the most accurate analysis practicable.

The lack of credibility in ComEd's testimony does not preclude the Commission from approving the Energy Efficiency Plan, but it does preclude the Commission from allowing the Company to avoid a full review of the Plan at the end of each year. The Commission cannot assume that the inputs in the Plan are supported by the record. Thus, ComEd can move forward with the plan, but not with a free pass on savings analysis and deemed values.

IV. COMED'S PLAN FAILS TO ADDRESS FUNDAMENTAL CUSTOMER USAGE ISSUES

While the utilities have focused exclusively on new programs promoting more efficient technologies, the Commission must direct ComEd and Ameren to better educate customers on steps they can take to improve efficiency and save money without new investment.

Unfortunately, both utilities pay little attention to this element of conservation/efficiency. Neither discusses it all in its testimony.

One easy step customers can take to save money is properly setting their thermostats. ComEd's testimony does not address this issue. In data response ELPC 1.29, the company indicates it has done little to educate customers other than make such information on its web site, where it is difficult, if not impossible find. It is generally accepted that consumers can save 3% on their bill for every degree they raise their thermostat in the summer. ComEd acknowledges that this information should be part of a public education campaign. "Going forward, ComEd plans to continue and expand this education element as part of its Energy Efficiency and Demand Response Plan." ComEd Resp ELPC 1.29.

In addition to properly setting their thermostats, customers can lower their consumption by using a programmable thermostat that adjusts the temperature during the day when they are not at home. In response to inquiry by ELPC, ComEd stated that it has no information regarding how many customers currently have, or use, programmable thermostats. ComEd resp ELPC 1.30 Again, “Going forward, ComEd recognizes the importance of data regarding usage of programmable thermostats, and will consider conducting market assessment and baseline studies for future planning purposes.” *Id.* While ComEd seems to commit to this effort, the Commission should order it to do so.

V. COMED’S PLAN IGNORES GROWTH ISSUES

If unchecked, utilities predict 1.5% annual growth in usage with much of that increase stemming from increased customer usage of electronic appliances such as televisions and computers. While ComEd’s plan outlines a number of programs to reduce energy usage through implementation of efficient lighting and recycling old appliances, it is silent on how it will check the growth in demand stemming from new household appliances.

The best example of this issue is the plasma television. A recent study by ECOS Consulting indicates that plasma televisions use 6 times the amount of electricity as a traditional television, and roughly equivalent to that of a refrigerator, which is the single largest energy-consuming appliance in most households. ELPC Ex. 1.0 at 7. ComEd needs to make customers aware of these issues as part of its customer education program, so that they are aware that in order to reduce energy they need to take a comprehensive approach

Additionally, the new appliances customers are adding use energy as long as they are plugged in, even if not in actual use - a concept referred to as “phantom load.” ComEd indicates it has done no research to determine phantom load’s effect on customer usage levels, nor has it

done any research on likely future effects. ComEd Resp ELPC 1.36. However, studies which ComEd cites indicate that phantom loads represent up to 5% of residential energy usage.

In order to ensure that ComEd's customers take a comprehensive approach to efficiency, the Commission should order ComEd to include education on appliance efficiency and phantom load in its education program.

VI. COMED SHOULD NOT HAVE UNLIMITED FLEXIBILITY ON REALLOCATION OF FUNDS

In his direct testimony, ELPC witness Crandall supports Com Ed's request for flexibility in the reallocation of funding among programs based on program performance and demand. This allows the utilities to shift dollars between programs that perform better or worse than anticipated. However, Mr. Crandall supports this concept with the critical limitation that "the relative share of funds assigned to specific sectors (residential, commercial, industrial) remain approximately proportionate to the proposed levels in the plan." ELPC Ex.1.0 at 5.

All parties agree with the need for the overall program to retain some flexibility. In addition, in his rebuttal testimony, Com Ed witness Brandt acknowledges that "Com Ed must maintain a diverse cross-section of programs that provides opportunities to all customers, which is critical to the overall success of the portfolio." Com Ed Ex. 9.0 at.22.

ELPC believes that this diversity is not just "critical to the overall success of the portfolio" but is also important from an equity standpoint to the extent that ratepayer dollars funding the programs should be available to those same ratepayer groups in roughly equal amounts. There are energy efficiency opportunities in each customer class and the program should help each of these groups realize these opportunities.

CONCLUSION

Based on the foregoing, ELPC requests that the Commission modify Ameren's Plan as set forth above.

Respectfully submitted,

A handwritten signature in black ink that reads "Robert J. Kelter". The signature is written in a cursive style with a large initial "R" and "K".

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January 14, 2008

CERTIFICATE OF SERVICE

I, Robert Kelter, hereby certify that I served on January 14, 2008 the attached INTITIAL BRIEF OF THE ENVIRONMENTAL LAW & POLICY CENTER upon all active parties of record identified on the included service list electronically via e-mail.

A handwritten signature in black ink that reads "Robert A. Kelter". The signature is written in a cursive style with a large initial 'R' and 'K'.

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