

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

CENTRAL ILLINOIS LIGHT COMPANY)
d/b/a Ameren CILCO,)
)
CENTRAL ILLINOIS PUBLIC SERVICE)
COMPANY,)
d/b/a Ameren CIPS,)
)
ILLINOIS POWER COMPANY)
d/b/a Ameren IP,)
)
Proposed general increase in rates for)
delivery service. (Tariffs filed November 2,)
2007))

Docket Nos. 07-0585, 07-0586,
07-0587, 07-0588, 07-0589, and
07-0590 (cons.)

JOINT MOTION TO ADMIT DATA REQUEST RESPONSES INTO THE RECORD

NOW COME THE GRAIN AND FEED ASSOCIATION OF ILLINOIS ("GFAI") and AMEREN ILLINIOS UTILITIES ("AIU"), and jointly move to admit data request responses into the record, and in support thereof, state as follows:

1. GFA and AIU have agreed to enter certain data requests and their respective responses into the record, in lieu of cross-examination.
2. Those data request responses are attached hereto as Attachment 6.0, Attachment 7.0, Attachment 8.0 and Attachment 9.0.
3. GFA and AIU desire to admit these data request responses into the record in order to more expeditiously enter the facts upon the record and to conserve judicial resources.

WHEREFORE, the GRAIN AND FEED ASSOCIATION OF ILLINOIS and AMEREN ILLINOI UTILITEIS respectfully request that the data requests responses attached hereto be entered into the record in these dockets.

OFFICIAL FILE

ILL. C. C. DOCKET NO. 07-0585-0590

GFAE Cross Exhibit No. 1

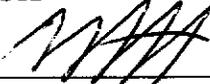
Witness _____

Date 6-13-08 Reporter CB

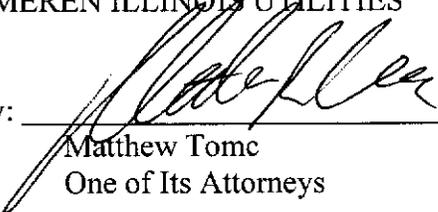
June 12, 2008

Respectfully submitted,

GRAIN AND FEED ASSOCIATION OF
ILLINOIS

By: 
William P. Streeter,
One of Its Attorneys

AMEREN ILLINOIS UTILITIES

By: 
Matthew Tomc
One of Its Attorneys

William P. Streeter
Hasselberg, Williams, Grebe, Snodgrass & Birdsall
124 SW Adams St., Suite 360
Peoria, Illinois 61602
Phone: (309) 637-1400
Facsimile: (309) 637-1500
Email: wstreeter@hwgsb.com

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ATTACHMENT A

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
Grain and Feed Association of Illinois (GFA) Data Requests
ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

- GFA 6.01** Reference Glaser Rebuttal Testimony, beginning at Line 735-750:
Ameren's one-time offer to waive the July 1, 2008 notification date until the later of October 17, 2008 or 14 days after compliance tariffs become effective is still a problem for the 2008 harvest season. Even though relatively small amounts of natural gas are used by grain dryers outside the harvest season, the tariff requires all customers to stay on sales or transportation service for 12 months. Because of the issues raised by GFAI and other interveners regarding final transportation tariffs will likely not be resolved prior to September 1, 2008, GFAI is seriously considering moving all of its grain dryer accounts that are in the GFAI Energy Consortium back to sales service effective August 1, 2008 to retain eligibility to transport for the 2009 harvest.
- a) Will Ameren also waive the 12 month requirement for seasonal accounts?
 - b) How much advance notice will Ameren require to move transportation accounts to sales service for the 12 month period beginning August 1, 2008?
 - c) Must a grain dryer give notice by the later of October 17, 2008 or 14 days after compliance tariffs become effective if the grain dryer wants to switch to transportation service effective on or about August 20, 2009?

- Response:**
- a) No. Ameren does not intend to waive the requirement for a sales or transportation customer to stay on their elected service for 12 months.
 - b) Transportation customers under AmerenIP Rate Schedule OT are required to provide 30 days prior notice to switch from transportation service to sales service. All other transportation customers would have had to provide notice prior to July 1, 2007 for a change to sales service to be effective on November 1, 2007 or a later date if mutually agreed to by the parties. The next opportunity for a change in service elections is prior to July 1, 2008 to be effective on November 1, 2008 with the one-time right to change the election prior to the later of October 17, 2008 or 14 days after the compliance tariffs become effective.
 - c) As discussed in b) above, customers are required to notify the

Ameren Illinois Utilities of a desired change in service prior to July 1, 2008 with such service change to become effective on November 1, 2008 unless a later date is mutually agreed to by the parties. Customers that provide notification of a change in service prior to July 1, 2008 will have a special one time right to change the election prior to the later of October 17, 2008 or 14 days after the compliance tariffs become effective.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: May 21, 2008

ATTACHMENT B

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
Grain and Feed Association of Illinois (GFA) Data Requests
ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

GFA 7.01 Referring to lines 224-236, do you agree that Mr. Adkisson's rebuttal testimony at lines 184 through 199 does not indicate that an AmerenIP GDS-2, 3 and 4 customer will pay \$666, \$1,345, and \$5,211 respectively more for transport service than sales service, but instead states that a small AmerenIP GDS-2 grain dryer customer will pay \$666.00 more annually for transport service than under sales service for just the telemetry (emphasis added) and approximately \$1,345.00 more annually for delivery service?

Response: Mr. Adkisson's claim that a GDS-2 grain dryer will pay \$666 more annually for transport service than under sales service for just telemetry is in error. While the arithmetic calculation is correct, what Mr. Adkisson fails to consider and what I am attempting to convey is the bill differential which exists today between Rate SC63 (sales) and Rate SC76 (transport) customers:

Rate SC63: $\$29.23 \times 12 = \350.76

Rate SC76: $(\$29.23 + \$16.50 + \$21.25) \times 12 = \803.76

Current differential: $\$803.76 - \$350.76 = \$453$

Therefore, the small grain dryer would pay \$213 ($\$666 - \453) more for telemetry under the rates filed in the AIU's direct case than under current rates. With the exception of rounding, this increase is consistent with the across the board increase proposed by the AIU. If one were to calculate the revised rates based on the AIU proposed position on rebuttal to increase each rate component by the overall ATB increase, the difference would be identical to the overall percentage increase. It should be noted the failure of Mr. Adkisson to consider the present differential also holds true for Mr. Adkisson's claim that an AmerenIP GDS-2 and GDS-3 grain dryer will pay \$1,345 and \$5,211, respectively, more annually for delivery service.

In addition, the AIU have proposed, on rebuttal, that AmerenIP Rider OT rate structure be grandfathered. Under this proposal an AmerenIP GDS-2 and 3 grain dryer using Rider OT will realize the same overall percentage increase as a sales customer on GDS-2 or GDS-3 as opposed to the differentials claimed by Mr. Adkisson.

Prepared By: William M. Warwick
Title: Managing Supervisor, Rate
Engineering and Analysis
Phone: (314) 554-2060
Date: June 3, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
Grain and Feed Association of Illinois (GFA) Data Requests
ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

GFA 7.02 Referring to lines 260-270, do you agree that GFAI Revised Response to Staff data Request POL-11.05 dated May 29, 2008, which is also included in the revised response to Ameren Data Request 3.01 and referred to in GFA Exhibit 1.4, correctly reflects the rates proposed by Ameren?

Response: The revised GFA Exhibit 1.4 appears to correctly reflect the rates originally proposed by the Ameren Illinois Utilities (AIU) but does not reflect the position taken in rebuttal of the Ameren Illinois Utilities to increase each existing rate value by the across-the-board percentage increase, nor does it reflect the Ameren Illinois Utilities proposal on surrebuttal to grandfather the AmerenIP Rider OT rate structure.

Prepared By: William M. Warwick
Title: Managing Supervisor, Rate
Engineering and Analysis
Phone: (314) 554-2060
Date: June 3, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
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Proposed general increase in electric and gas delivery services rates

GFA 7.03 Referring to lines 260-270, do you agree that proposed AmerenCIPS GDS-2 and GDS-3 rates have identical cents per Therm Distribution Delivery Charges?

Response: The per therm Distribution Delivery Charges of AmerenCIPS GDS-2 and GDS-3 represent an across-the-board increase of rates that are currently equal, so I would agree that the resulting GDS-2 and GDS -3 per therm Distribution Delivery Charges are the same.

Prepared By: William M. Warwick
Title: Managing Supervisor, Rate
Engineering and Analysis
Phone: (314) 554-2060
Date: June 3, 2008

ATTACHMENT C

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
Grain and Feed Association of Illinois (GFA) Data Requests
ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

GFA 8.01 Referring to lines 176 and 178, is the reference to "peak" referring to annual coincident peak, summer coincident peak, winter coincident peak, annual non-coincident peak, summer non-coincident peak, winter non-coincident peak or other. If other, what other? Please explain.

Response: The term "peak" as used on line 176 is meant to represent the customer's contribution toward the maximum demand placed on local distribution facilities, as referenced in lines 174 – 175. In this regard, peak would be an annual coincident peak for the local facilities.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
Grain and Feed Association of Illinois (GFA) Data Requests
ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

GFA 8.02 Referring to lines 176 and 178, what distribution plant allocators were used to develop current distribution delivery service rates?

Response: Present distribution delivery service rates were developed using the non-coincident class peak demands for each of the classes.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.03 Referring to lines 176 and 178, are there arguments for other distribution plant allocators that have been argued and/or used in this or any other regulatory proceeding?

Response: Objection. The question is unduly burdensome and not likely to lead to the discovery of admissible evidence in that it seeks information for "any other regulatory proceeding". Without waiving the objection, the Ameren Illinois Utilities states, yes. Use of the Minimum Distribution System is a form of distribution plant allocator at issue in this proceeding

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.04 Referring to lines 176 and 178, aside from proposed rates being based predominately on an ATB percentage change, when Ameren files its next electric based on an embedded cost of service study, will interveners have the opportunity to present arguments for different distribution plant allocators and does the Commission have the authority to order use of different distribution plant allocators?

Response: Objection. The data request calls for a legal conclusion as to what is the Commission's authority. As to what interveners may argue in the next rate case, Mr. Jones is not aware of their intentions at this time.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.05 Referring to lines 181 through 223, in your example, were the 12 monthly non-coincidental peaks of the manufacturing customer four times that of the grain drying customer? If not, explain.

Response: The manufacturing customer set a monthly maximum demand of 1,500 kW in each month within an annual period, producing 18,000 kW in billing demands. The grain drying customer was assumed to hit a monthly maximum demand of 1,500 kW in two months, and 150 kW in the remaining 10 months, producing 4,500 kW in annual billing demands. (See lines 187 – 190) Taking 18,000 kW divided by 4,500 kW shows that the manufacturing customer had 4 times the monthly billing demands of the grain drying customer.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.06 Referring to lines 181 through 223, does Ameren design and build its distribution system with capacity considerations for:

- a. Reliability through switching customer loads to alternative or back-up circuits?
- b. The ability to switch circuits from one substation to another?
- c. Multiple distribution circuits being served from the same substation transformer(s)?
- d. Load growth?
- e. Continuous service regardless of when the circuit peak load may occur?

Response:

- a. The Ameren Illinois Utilities' system is planned and built to provide customers with a single supply. System planning and design does not prescribe a level of backup capacity. Circuit ties are constructed to improve reliability and facilitate maintenance when cost effective. If a customer requests an alternate or back-up supply, Ameren Illinois Utilities will provide the alternate supply at the customer's expense. The system is then planned to maintain the reserve capacity on the alternate supply.
- b. In general, the system is not planned and designed with the ability to switch circuits from one substation to another. However, in some instances circuit ties exist such that load can be switched to a circuit supplied from another substation. The portion of the load that can be switched will vary greatly depending on the overall circuit and substation load.
- c. Each distribution substation transformer will supply one or more circuits. A typical transformer will supply one to three circuits, with the number of circuits being determined by the geographical area and total load being served.
- d. Yes. Load growth is considered in the planning and design of the distribution system. System upgrades and additions are scheduled based on projected load growth. Future load growth is also considered in sizing new facilities. Ameren Illinois Utilities do not specifically maintain a capacity margin for future load growth. Facilities are upgraded as needed to avoid equipment overloads and maintain acceptable delivery voltage.

- e. The system is planned to supply all loads during peak load periods with normal conditions on the distribution system, where normal system condition is considered to be all components of the system in service and operating properly.

Prepared By: Martin J. Hipple
Title: Supervising Engineer, Distribution
System Planning
Phone: (217) 424-8390
Date: June 9, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
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ICC Docket Nos. 07-0585 thru -0590 (Cons.)
Proposed general increase in electric and gas delivery services rates

GFA 8.07 Referring to lines 202 through 212, please define Primary and High Voltage.

Response: Primary refers to less than 15 kV, and High Voltage refers to over 15 kV up to 100 kV.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.08 Referring to lines 202 through 212, please define Distribution facilities.

Response: The term "Distribution facilities" is not used at lines 202 through 212. Nevertheless, the discussion at lines 202 through 212 pertains to ICC regulated distribution charges for recovery of ICC regulated distribution facilities.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.09 Referring to lines 202 through 212, please define Transmission facilities.

Response: The term "Transmission facilities" is not used at lines 202 through 212. Nevertheless, the term "transmission facilities" can be taken to mean the facilities regulated under the jurisdiction of the FERC. The discussion at lines 202 through 212 does not contemplate such facilities.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.10 Referring to lines 202 through 212, do the AIU have Distribution plant with voltages above 15 kV? If so, are these facilities directly assigned to specific customers or groups of customers or to all customer classes? Please explain.

Response: Yes, the Ameren Illinois Utilities have distribution plant with voltages above 15 kV. The costs of +15 kV equipment was allocated to all customer classes in ICC Docket Nos. 06-0070/06-0071/06-0072 using the non-coincident peak demand allocation method.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
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GFA 8.11 Referring to lines 202 through 212, what is the total Distribution plant value, net of depreciation, for each AIU?

Response: The discussion at lines 202 – 212 pertains to the Distribution Delivery Charge, which excludes customer and meter related costs. For DS-4, the Distribution Delivery Charge was developed in Docket Nos. 06-0070/06-0071/06-0072 by also excluding the revenue contribution from the Transformation Capacity Charge and the Reactive Demand Charge. The distribution plant value, net of depreciation for each AIU, but including costs associated with Transformation and Reactive service, as determined in the ECOSS filing submitted as Part 285 Schedule E-6, is as follows:

Net Plant			
(w/o Services & Meters)			
(in thousands)			
<u>Utility</u>	<u>Under 15 kV</u>	<u>+15 kV/under 100 kV</u>	<u>+100 kV</u>
AmerenIP	\$1,029,464	\$35,450	\$0
AmerenCILCO	\$ 292,183	\$ 2,395	\$0
AmerenCIPS	\$ 442,477	\$12,170	\$0

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

AmerenCILCO's, AmerenCIPS', and AmerenIP's
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GFA 8.12 Referring to lines 202 through 212, for High Voltage and +100 kV levels, what is the Distribution plant value, net of depreciation, for each AIU?

Response: See the Ameren Illinois Utilities' Response to Grain and Feed Association of Illinois Data Request No. GFA 8.11 filed concurrently herewith.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.13 Referring to lines 202 through 212, if a grain dryer takes distribution delivery service under DS-4 from a 12,470 volts primary circuit that is serviced from an Ameren substation with 161 kV high-side voltage connected to an Ameren 161 kV transmission line, pays an ARES for supply and Ameren's MISO transmission charges, is that grain dryer still paying for some High Voltage and +100 kV Distribution facilities through the DS-4 distribution delivery rate?

Response: Yes.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

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GFA 8.14 Referring to lines 202 through 212, please explain how and why, beginning at Line 204, the Distribution Delivery Charge at primary voltage includes costs for facilities at the Primary, High Voltage and +100 kV levels?

Response: The pricing structure assumes that customers served from a Primary voltage system (under 15 kV) are connected to a High Voltage system (+15 kV up to 100 kV) which is next connected to facilities with voltages over 100 kV. This voltage progression is common at the Ameren Illinois Utilities. Across the IL system, 43 out of 1,112 distribution substation transformers are supplied from the 138 kV, or approximately 4% of the total.

Prepared By: Leonard M. Jones
Title: Manager, Rates & Analysis
Phone: (314) 206-1878
Date: June 9, 2008

Prepared By: Martin J. Hipple
Title: Supervising Engineer, Distribution
System Planning
Phone: (217) 424-8390
Date: June 9, 2008

ATTACHMENT D

AmerenCILCO's, AmerenCIPS', and AmerenIP's
Response to
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GFA 9.01 Referring to lines 31 through 36, are AIU proposing to grandfather Rider OT with or without telemetry required?

Response: Telemetry would be required.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008

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GFA 9.02 Referring to lines 31 through 36, will grandfathered Rider OT customers still be able to move to and from transport and sales service under Rider OT more frequently than once each November 1st?

Response: No.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008

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- GFA 9.03** Referring to lines 31 through 36, for non-grandfathered customers that would otherwise have been eligible for Rider OT if it were not grandfathered, will these small to intermediate customers
- a) be required to have telemetry to transport under Rider T?
 - b) be able to move to and from transport like Rider OT customers more frequently than once each November 1st?

- Response:**
- a) Yes.
 - b) No.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008

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GFA 9.04 Referring to lines 660 through 681, for a grain dryer with seasonal use that qualifies for GDS-5 but economically chooses to take service under GDS-2 or GDS-3 because of the relatively high GDS-5 monthly customer charges, when, under your latest proposed notification provision, will that grain dryer be required to notify AIU of its intent to take sale service or transport service for the September-October, 2010 harvest, which is within the 12 month period beginning November 1, 2009?

Response: Prior to July 1, 2009.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008

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GFA 9.05 If the answer to the DR 9.04 is July 1, 2009, isn't that having to give notice two harvests in advance?

Response: It is providing at least four months prior notice for a customer's service election for the 12 month period beginning November 1, 2009 which is the same provision that is applicable to all other non-seasonal use (GDS-5) customers.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008

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GFA 9.06 Will AIU offer the April 1 notice to be effective August 1 for not only GDS-5 seasonal customers, but for all seasonal customers that "qualify for GDS-5", whether or not they choose to take service under GDS-5?

Response: No.

Prepared By: Scott A. Glaeser
Title: Vice President, Gas Supply
Phone: (314) 554-4271
Date: June 10, 2008