

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

Central Illinois Light Company d/b/a AmerenCILCO)	Docket No. 09-0306
)	
Proposed general increase in electric delivery service rates.)	
)	
Central Illinois Public Service Company d/b/a AmerenCIPS)	Docket No. 09-0307
)	
Proposed general increase in electric delivery service rates.)	
)	
Illinois Power Company d/b/a AmerenIP)	Docket No. 09-0308
)	
Proposed general increase in electric delivery service rates.)	
)	
Central Illinois Light Company d/b/a AmerenCILCO)	Docket No. 09-0309
)	
Proposed general decrease in gas delivery service rates.)	
)	
Central Illinois Public Service Company d/b/a AmerenCIPS)	Docket No. 09-0310
)	
Proposed general increase in gas delivery service rates.)	
)	
Illinois Power Company d/b/a AmerenIP)	Docket No. 09-0311 (Cons.)
)	
Proposed general increase in gas delivery service rates.)	
)	

MOTION OF THE AMEREN ILLINOIS UTILITIES FOR LEAVE TO FILE REVISED AND CORRECTED REBUTTAL TESTIMONY

Illinois Power Company (“AmerenIP”), Central Illinois Light Company (“AmerenCILCO”) and Central Illinois Public Service Company (“AmerenCIPS”) (together, the “Ameren Illinois Utilities” or “AIUs”), pursuant to 83 Ill. Adm. Code Section 200.190, hereby

move for leave to file revised rebuttal testimony reflecting the AIUs agreement to withdraw its request to implement a rider related to the costs of Liberty Audit projects. In addition, the AIUs have revised certain rebuttal testimony and exhibits to reflect the corrections discussed below. In support of their Motion, the AIUs state as follows:

WITHDRAWAL OF LIBERTY AUDIT RIDER PROPOSAL

1. In the AIUs' rebuttal testimony filed on October 23, 2009, AIU witnesses Craig Nelson (Ameren Exhibit 26.0) and Robert Mill (Ameren Exhibit 39.0) proposed establishing a Rider RPS to recover implementation costs related to the Liberty Audit recommendations (the "Rider").

2. Following discussions with counsel for Illinois Commerce Commission Staff, the AIUs have agreed to withdraw their proposal to establish the Rider from this proceeding.

3. In light of their agreement withdraw the Rider proposal, certain portions of the testimony of AIU witnesses Craig Nelson, Robert Mill, Ronald Pate and Ronald Stafford are no longer necessary. The AIUs therefore propose to revise these witnesses testimony as follows, and accordingly seek leave to file such revised testimony.

4. Clean copies of each witnesses testimony is provided with this filing.

Ameren Ex. 26.0 (Rev.) – Craig Nelson

1. On Page 5, Lines 62-63, the phrase "plus the ability to recover Liberty Audit implementation costs via a rider as discussed below" has been deleted;

2. On Page 11, Lines 232-234, "Later, in my rebuttal testimony, I discuss an alternate proposal for recovering Liberty Audit implementation costs given Staff's exclusion of the Companies' proposed Liberty audit pro forma adjustments" has been deleted;

3. On Pages 21-24, Lines 458-521 have been deleted;

4. On Page 26, “Liberty Audit Implementation Cost Recovery” has been deleted from the “Topics Addressed” column for Craig D. Nelson;
5. On Page 27, “Reliability Projects Surcharge Rider RPS” has been deleted from the “Topics Addressed” column for Robert J. Mill and the reference to Exhibit 39.2 has been changed to 39.1.

Ameren Ex. 29.0 (Rev.) – Ronald Stafford

1. On Page 26, Lines 609-612, the sentence beginning with “As discussed in the rebuttal testimonies...” has been deleted;
2. On Page 26, Lines 612-613, the sentence “Ameren Exhibit 29.10 shows the corresponding adjustment to the AIUs’ electric revenue requirement” has been changed to “Ameren Exhibit 29.10 shows an adjustment to remove the Liberty Audit pro forma adjustment from the AIUs’ electric revenue requirement”.

Ameren Ex. 33.0 (Rev.) – Ronald Pate

1. On Page 1, Lines 21-22, the phrase “and the AIUs’ need for a funding mechanism to implement these recommendations” has been deleted;
2. On Page 24, Line 539, “a mechanism for the” has been deleted;
3. On Page 24, Lines 547-548, “in base rates or through the rider discussed by the AIUs’ witness Mr. Robert Mill” has been deleted;
4. On Page 25, Lines 549-565 have been deleted.

Ameren Ex. 39.0 (Rev.) – Robert Mill

1. On Page 1, Lines 18-19, the phrase “Additionally, to introduce a new rider, Reliability Projects Surcharge (“Rider RPS” or “RPS”), and finally,” has been deleted;

2. On Page 2, Lines 23-24, the sentence “I am also sponsoring the proposed Rider RPS tariff as Ameren Exhibit 39.2” has been deleted;
3. Section IV “RIDER RPS” beginning on page 7 has been deleted.

CORRECTIONS AND ERRATA

5. The AIUs also submit the following corrections and errata to their to their rebuttal testimony and exhibits filed on October 23, 2009. The majority of these changes have previously been identified in data responses or other communications with Illinois Commerce Commission (“Commission”) Staff. Clean, revised copies of each of the following testimonies or exhibits accompany this filing.

Ameren Ex. 26.0 (Rev.) – Craig Nelson

1. On Page 27, the reference to Ameren Ex. 36.0 – 36.2 has been changed to Ameren Ex. 36.0;
2. On Page 27, the reference to Ameren Ex. 42.0 – 42.2 has been changed to Ameren Ex. 42.0 – 42.1.

Ameren Ex. 29.0 (Rev.) – Ronald Stafford

1. In the header, “exibit” has been changed to “exhibit”;
2. On Page 9, Line 216, “\$6 million” has been changed to “\$5 million”;
3. On Page 10, corrections were made to the Ameren Illinois Utilities Net Write-Offs table as shown on Attachment A hereto;
4. Appendix A to Ameren Exhibit 29.0 (Rev.) has been revised as follows: The heading was changed from AmerenCIPS Electric to AmerenCILCO Electric. For each of the AIUs, Pension & Benefit Expense for the 12 months ending September 2009 has been corrected to properly conform to the Attachment A source documents provided in response to Staff Data Request TEE 17.08. In

assembling the source documents used to prepare Attachment A, it was determined that the workpaper supporting the Attachment A line item for Pension & Benefit Expense for 12 months ending September 2009 incorrectly removed a credit to expense for the portion of AMS (“Ameren Services”) charges and IB (“Intercompany Billing”) charges transferred to construction. Both the AMS and IB charges presented on the workpaper were net of such transfers, so a separate credit was not needed for the portion transferred to construction. In addition, minor corrections have been made to properly reflect the IB charges from AmerenIP to AmerenCIPs gas consistent with the source documents provided in response to TEE 17.08.

Ameren Ex. 33.0 (Rev.) – Ronald Pate

1. On the cover page, “Informaiton” has been changed to “Information”;

Ameren Ex. 34.0 (Rev.) – Michael Getz

2. On Page 6, Line 126, “expenses” has been changed to “costs”;
3. On Page 8, Line 174, “contract or” has been deleted;
4. On Page 8, Line 175, “contract or” has been deleted;
5. On Page 10, Line 210, “Did Ms. Everson consider” had been changed to “Does Ms. Everson’s direct testimony discuss”;
6. On Page 10, Lines 212-213, the phrase “In fact, Ms. Everson largely ignores...” has been changed to “Ms. Everson’s direct testimony does not address all of ...”;
7. On Page 10, Line 215, “must” has been changed to “will”;
8. On Page 10, Line 217, “executed contracts or” has been deleted;
9. On Page 10, Lines 218-223, “Nor has the Staff taken steps to inquire whether internal resources have been committed to putting plant in service; whether

construction work plans or budgets have been approved; or whether project schedules indicate when work is scheduled to be performed. Indeed, Ms. Everson fails to undertake any effort to assess whether projects in progress or not yet open are reasonably certain to be in service by June 4, 2010.” has been deleted;

10. On Page 14, Line 305, “expenses” has been changed to “costs”;
11. On Page 17, Line 380, “expenses” has been changed to “costs”;
12. On Page 18, Line 383, two instances where “expenses” was used has been changed to “costs”.

Ameren Ex. 37 (Rev.) – Michael O’Bryan

1. On Page 4, Lines 62 – 78 have been deleted as discussed in data response RP 14.06;
2. On Page 7, Line 144, “\$45.4” has been replaced with “\$133.3”.

Ameren Ex. 39.0 (Rev.) – Robert Mill

1. On Page 1, Line 19, “also” was inserted.

Ameren Ex. 40.0 (Rev.) – Leonard Jones

1. On Page 18, Line 375, the reference to Ameren Exhibit 29.23 has been changed to Ameren Exhibit 29.18.

Ameren Ex. 45.0 (Rev.) – Vonda Seckler

1. On Page 11, Line 244, “2006” has been changed to “2008”.

Ameren Ex. 48 (Rev.) – Peter Millburg

1. On Page 2, Line 39, “proposes” has been replaced with “proposed”;
2. On Page 10, Lines 188-189, “or higher” has been deleted.

November 11, 2009

Respectfully submitted,

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/ Albert D. Sturtevant
One of its attorneys

Christopher W. Flynn
Mark P. Rotatori
Albert D. Sturtevant
Mark W. DeMonte
JONES DAY
77 W. Wacker, Suite 3500
Chicago, Illinois 60601
(312) 782-3939 (voice)
(312) 782-8585 (fax)
cwflynn@jonesday.com
mprotatori@jonesday.com
adsturtevant@jonesday.com
mdemonte@jonesday.com

Edward C. Fitzhenry
Matthew R. Tomc
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, Missouri 63166
(314) 554-3533 (voice)
(314) 554-4014 (fax)
efitzhenry@ameren.com
mtomc@ameren.com

Mark A. Whitt
Christopher T. Kennedy (pro hac vice)
Carpenter Lipps & Leland LLP
280 Plaza, Suite 1300
280 North High Street
Columbus, Ohio 43215
whitt@carpenterlipps.com
(614) 365-4100 (Direct)
(614) 804-6034 (Mobile)
(614) 365-9145 (Fax)

PROOF OF SERVICE

I, Albert D. Sturtevant, an attorney, hereby certify that on November 11, 2009, I served a copy of the foregoing MOTION OF THE AMEREN ILLINOIS UTILITIES FOR LEAVE TO FILE REVISED AND CORRECTED REBUTTAL TESTIMONY by electronic mail to the individuals on the Commission's Service List for Dockets 09-0306 – 09-0311.

/s/ Albert D. Sturtevant

Albert D. Sturtevant
Attorney for the Ameren Illinois Utilities

CHI-1729149

Ameren Illinois Utilities
Net Write-Offs
(In Thousands)

Electric and Gas Net Write-Offs

	<u>CIL - E</u>	<u>CIP - E</u>	<u>IP - E</u>
2006	1,386	2,539	6,099
2007	2,953	5,544	9,568
2008	3,377	8,229	12,994
2009			
YTD	<u>2,542,357</u>	<u>4,067,98</u>	<u>87,091,73</u>
2009			
Annual	<u>3,536,89</u>	<u>6,402,39</u>	<u>10,760,88</u>
	<u>CIL - G</u>	<u>CIP - G</u>	<u>IP - G</u>
2006	4,643	2,872	7,805
2007	2,897	1,749	5,548
2008	5,008	3,772	11,462
2009			
YTD	<u>34,934,087</u>	<u>2,439,588</u>	<u>87,814,08</u>
2009			
Annual	<u>5,449,04</u>	<u>3,645,91</u>	<u>11,721,1</u>

1 Q. What is your recommendation for the AIUs?

2 A. I conclude that 2007-2009 actual data is more appropriate in this case than use of
3 2006-2008 actual data. As stated above, to address Staff, AG/CUB, and IIEC's concerns
4 with respect to use of budgeted or estimated data for this adjustment, I have elected to use
5 only year-to-date September 2009 data, rather than 2009 annualized, to calculate my
6 uncollectibles adjustment. The Commission should adopt my proposed method to
7 calculate uncollectible expense at present rates for the AIUs' electric and gas utilities as
8 well as the uncollectibles gross up factor used in the calculation of additional
9 uncollectibles at proposed rates, and to derive the Electric Power Supply SCA and Gas
10 PGA Supply Rider S uncollectibles factors. This approach is reflected in Ameren Ex.
11 29.4.