

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS POWER AGENCY)
) **Docket No. 09-0373**
Petition for Approval of Initial)
Procurement Plan)

AMEREN ILLINOIS UTILITIES' BRIEF ON EXCEPTIONS

COMES NOW, 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 (collectively referred to as “The Ameren Illinois Utilities” or “the AIUs”), by and through their attorneys and pursuant to the Administrative Law Judge’s (“ALJ”) Notice of November 23, 2009, and 83 ILAC 200.830, the AIUs offer this brief on exceptions:

1. At the outset the AIUs acknowledge the ALJ’s very thorough and complete review of the record, and compilation of the Proposed Order. The issues were many and complex, and in many instances never previously considered. In this context, the AIUs file this brief.

2. At page 28 of the Proposed Order, the quantity of on and off peak energy for the AIUs in 2010 is provided. Specifically the chart is as follows:

AIUs Peak Load Volumes to be Secured in 2010 Procurement Cycle by the IPA

Month	Year	Amount to be Procured (MW)	Year	Amount to be Procured (MW)	Year	Amount to be Procured (MW)
June	2010	450	2011	550	2012	0
July	2010	1000	2011	1150	2012	0
August	2010	1050	2011	1100	2012	0

September	2010	550	2011	500	2012	0
October	2010	400	2011	250	2012	0
November	2010	450	2011	300	2012	0
December	2010	650	2011	600	2012	0
January	2011	700	2012	700	2013	800
February	2011	650	2012	500	2013	750
March	2011	500	2012	300	2013	650
April	2011	350	2012	100	2013	550
May	2011	350	2012	150	2013	550

AIUs Off Peak Load Volumes to be Secured in 2010 Procurement Cycle by the IPA

Month	Year	Amount to be Procured (MW)	Year	Amount to be Procured (MW)	Year	Amount to be Procured (MW)
June	2010	550	2011	250	2012	0
July	2010	600	2011	600	2012	0
August	2010	550	2011	550	2012	0
September	2010	400	2011	200	2012	0
October	2010	400	2011	50	2012	0
November	2010	400	2011	150	2012	0
December	2010	650	2011	400	2012	0
January	2011	750	2012	550	2013	750
February	2011	650	2012	400	2013	700
March	2011	450	2012	200	2013	600
April	2011	350	2012	0	2013	500
May	2011	350	2012	0	2013	500

(IPA Plan at 30-32)

Upon review of the chart above, it appears certain values changed relative to the IPA

Plan, specifically the July 2010 on peak value should be 1,100 MW and the August 2010

off peak value should be 700 MW. IPA Plan at 30-32. Accordingly, the AIUs

recommend the insertion of the aforesaid values.

- At page 150 of the Proposed Order is the following:

The IPA agrees with AIU's recommendations that "successful demand response suppliers should be directly responsible for satisfying the MISO registration requirements." Section 16-111.5(b)(3)(ii)(B) of the PUA requires that demand

4. The AIUs have no disagreement with the text as is, but are not aware of any Illinois Commerce Commission finding relevant to the MISO or PJM registration processes. Accordingly, at the end of the paragraph, it is recommended that the following be added:

“Based on the forgoing, the Commission agrees the winning suppliers are obligated to satisfy the MISO and PJM registration requirements”.

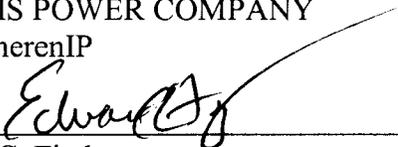
Dated: November 30, 2009

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:  _____

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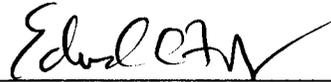
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CERTIFICATE OF SERVICE

I, Edward C. Fitzhenry, hereby certify that a copy of the foregoing *Brief on Exceptions* on behalf of the Ameren Illinois Utilities was filed on the Illinois Commerce Commission's e-Docket and served to all parties of record in this docket on this 30th day of November, 2009.



Edward C. Fitzhenry