

The Ameren Illinois Utilities'
Response to Illinois Industrial Energy Consumers' ("IIEC") Data Requests
Docket Nos. 09-0306 thru 09-0311 (cons.)
Proposed general increase in electric and gas delivery service rates
Response Date: 9/25/2009

IIEC 7.02

A comparison of the class demand allocation factors used in the ECOS studies filed with AIU's 2008 rate case (Docket Nos. 07-0585 et al.) with those used in the current case shows that significant differences exist in the class allocation factor values as well as the allocation factors used to allocate costs. With respect to these class allocation factors, please answer the following questions:

- a) Please explain why the allocation factors filed in AIU's 2008 rate case suggest that certain classes (e.g., DS-4 secondary) did contribute to the system demand in that case, yet do not contribute to the system demand in the current case.
- b) Please explain why the allocation factors filed in AIU's 2008 rate case suggest that certain classes (e.g., DS-4 100+ kV) do not contribute to the system demand in that case, yet do contribute to the system demand in the current case. Please explain the basis for the changes in allocation factors.

RESPONSE

Prepared By: Karen Althoff
Title: Supervisor – Rates & Analysis
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The allocation factors used in the current case are based on a combination of supply and delivery voltage. Based on Ameren's Voltage Definitions, customers can be supplied via substation feeder at one voltage level but ultimately delivered energy at a lower voltage level. These differences in supply vs. delivery voltage are essential to determine each rate class' load contribution for each segment of the distribution system. The previous case's allocation factors were based on supply voltage alone. The current case's allocations are a better representation of cost causation due to the recognition of delivery voltage.

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IIEC 11.02

Please provide the total number of DS-4 +100 kV customers that are served by AmerenIP's, AmerenCIPS's, or AmerenCILCO's distribution systems. Please include the supply voltage and the delivery voltage of the DS-4 +100 kV customers in each territory, preferably in the same format as the table on page 10 of Ms. Althoff's rebuttal testimony.

RESPONSE

Prepared By: Karen R. Althoff
Title: Supervisor – Rates & Analysis
Phone Number: (217) 424-8399

The below table reflects number of service points given that customers can have multiple service points with varying supply and delivery voltages.

Supply Voltage Description	Delivery Voltage Description	IP	CILCO	CIPS	Total
601-30,000v-Distribution Primary	0-600v-Secondary	0	1	0	1
	601-30,000v-Distribution Primary	3	1	0	4
30,001-100,000v-Distribution HV	0-600v-Secondary	0	0	0	0
	601-30,000v-Distribution Primary	0	0	0	0
	30,001-100,000v-Distribution HV	0	0	0	0
Greater than 100kv-Transmission	601-30,000v-Distribution Primary	2	3	0	5
	30,001-100,000v-Distribution HV	0	0	0	0
	Greater than 100kv-Transmission	21	2	0	23

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IIEC 9.02

Of the eight DS-4 customers that AIU serves at 100+ kV (i.e., AmerenIP, 4; AmerenCIPS, 0; AmerenCILCO, 4), how many are served at delivery voltages that are at primary or high voltage levels?

RESPONSE

**Prepared By: Leonard M. Jones
Title: Manager – Rates & Analysis
Phone Number: (314) 206-1878**

Of the eight customers referenced above, all four AmerenCILCO customers take transformation service, although one customer only uses transformation service for part of its load. Thus, all four AmerenCILCO customers use lower voltage facilities. Three of the AmerenIP service points also take delivery service at +100 kV, and the remaining AmerenIP customer rents transformation facilities for part of their load, thus utilizing part of the lower voltage systems.

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IIEC 11.03

Of the DS-4 +100 kV customers identified above, how many provide their own voltage transformation?

RESPONSE

Prepared By: Karen R. Althoff

Title: Supervisor – Rates & Analysis

Phone Number: (217) 424-8399

Please see the AIUs response to IIEC 9.02 (dated 10/27/2009) for the eight customers requested in that data request regarding voltage level transformation.

In addition to the eight customers above, there is one AmerenIP customer with nine service points that provides its own transformation on eight of the service points with the last service point using transformation service from the AIUs. An additional seven AmerenIP customers use transformation service from the AIUs for their entire load. Lastly, one AmerenIP customer provides its own transformation service.

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IIEC 9.05

Do the distribution facilities that transform and deliver power to the DS-4 100+ kV customers, also provide distribution service to other classes of customers? A). If so, please identify or estimate the portion of the facilities that are used specifically to serve the DS-4 100+ kV customers.

RESPONSE

Prepared By: Karen R. Althoff
Title: Supervisor – Rates & Analysis
Phone Number: (217) 424-8399

The AIUs are not clear what is meant by the DS-4 +100 kV customers referenced above; however, of the eight AIUs' customers referred to in IIEC 9.02, the AIUs provide transformation facilities for five customers, none of which are used to provide service to other classes of customers.

- a. The estimated portion of FERC Account 362 – Substation Equipment for all customers served under DS-4 with a supply line voltage of +100 kV is provided in the table below.

AmerenCILCO	5.5%
AmerenCIPS	3.0%
AmerenIP	4.6%