

**The Ameren Illinois Utilities'  
Response to ICC Staff Data Requests  
Docket Nos. 09-0306 thru 09-0311 (cons.)  
Proposed general increase in electric and gas delivery service rates  
Response Date: 11/19/2009**

DAS 11.05

With regard to Ameren Ex. 44.4 and the Companies' response to DAS 7.05, for each LDC:

- a) Please provide the excel files that provided the basis for 44.4.
- b) What are the planned or target reserve margins used in for AmerenIP for both 2008 and 2009?
- c) In Ameren's response to DAS 7.05, why is the Reserve margin for AmerenIP 22.6% when the same margins for AmerenCILCO and AmerenCIPS are 3.04% and 5.4% respectively (from Ex 44.4)?
- d) What is the marginal information that is cut out of the PDF files explaining how the sales requirements are determined?
- e) What is the marginal information that is cut out of the PDF files explaining how end-user transportation bank withdrawals determined?

**RESPONSE**

**Prepared By: Kenneth C. Dothage  
Title: Manager, Gas Supply  
Phone Number: 314-554-2353**

- a) Please see DAS 11.05 Attach (designated **CONFIDENTIAL**).
- b) Target reserve margins for each of the AIUs are approximately 3%.
- c) The AmerenIP reserve margin includes the 90,000 MDQ of NGPL capacity associated with the St. Louis Lateral which only provides for citygate deliveries.
- d) The marginal information on the PDF files were inadvertently omitted during the scanning process but are included on the enclosed DAS 11.05 Attach.
- e) The marginal information on the PDF files were inadvertently omitted during the scanning process but are included on DAS 11.05 Attach.

09-0306 through 09-0311 (Cons.)

**ATTACHMENT REDACTED**

09-0306 through 09-0311 (Cons.)

**DAS 12.01**

**The Ameren Illinois Utilities'  
Response to ICC Staff Data Requests  
Docket Nos. 09-0306 thru 09-0311 (cons.)  
Proposed general increase in electric and gas delivery service rates  
Response Date: 12/8/2009**

DAS 12.01

With regard to Ameren Ex. 27.0, p.4, lines 84-86,: a) Does the term “volumes” equal “usage” in this context? b) Please provide the tariff citation for the 20% factor applied to volumes.

**RESPONSE**

**Prepared By: Paul M. Normand**

**Title: President, Management Applications Consulting, Inc.**

**Phone Number: 610-670-9199**

a) Lines 84-86 of Ex. 27.0, p.4 are as follows:

“This is simply applying a 20% factor to the available (qualifying) transportation volumes.”

The “qualifying” values are the DCN for that day.

b) See subpart a), above.

**DAS 12.02**

**The Ameren Illinois Utilities'  
Response to ICC Staff Data Requests  
Docket Nos. 09-0306 thru 09-0311 (cons.)  
Proposed general increase in electric and gas delivery service rates  
Response Date: 12/8/2009**

DAS 12.02

With regard to Ameren Ex. 57.0, p.3:

- a) Please explain the meaning of the following: "However, the problem with using DCNs is that DCN are significantly lower than their actual usage on the peak day for transportation customers, the suggested use of DCNs in the allocation process would materially understate storage cost responsibility to transportation customers."
- b) Why are DCNs "significantly lower than their actual usage on the peak day for transportation customers"?
- c) Are DCNs always lower than Usage?
- d) What is the relationship between DCN and usage when a transportation customer withdraws gas from its bank?
- e) Does the fact that DCN are less than Usage always result in an understatement of cost allocation?
- f) What are the withdrawal rights that transportation customers receive on a peak day? Please provide the tariff citation for this.
- g) What is the benefit of storage to transportation customers on a Critical Day? On a historic peak day?

**RESPONSE**

**Prepared By: Paul M. Normand**

**Title: President, Management Applications Consulting, Inc.**

**Phone Number: 610-670-9199**

- a) The DCNs for transportation customers on the peak days of 1/24/2008 for AmerenCIPS and AmerenIP and 1/19/2008 for AmerenCILCO totaling 194,898 MMBtu were significantly lower than the transportation customers' actual usage on those days totaling 280,695 MMBtu. Given that transportation customers can actually nominate up to their individual MDCQ level which totals 405,542 MMBtu and given that a transportation customer's bank level is based on 10 times their MDCQ, use of the DCNs materially understates the storage cost responsibility that transportation customers should bear to support their banking rights.
- b) Customers did not nominate up to their actual usage level.
- c) No

- d) On non-critical days, daily balanced transportation customers can withdraw up to 20% of their DCN and monthly balanced transportation customers can withdraw up to 100% of their MDCQ. On critical days, daily balanced transportation customers can withdraw up to 20% of their DCN and monthly balanced transportation customers can withdraw up to 50% of their MDCQ.
- e) Yes.
- f) See subpart d), above. The tariff citation is 2<sup>nd</sup> Revised Sheet No. 25.005 and 2<sup>nd</sup> Revised Sheet No. 25.006, Rider T-Transportation Service.
- g) The AIUs do not provide storage service to transportation customers. If you are referring to the benefit of banks to transportation customers, see Response d., above.

09-0306 through 09-0311 (Cons.)

**DAS 12.04 with Attach**

**The Ameren Illinois Utilities'  
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Proposed general increase in electric and gas delivery service rates  
Response Date: 12/8/2009**

DAS 12.04

With regard to the Companies' response to DAS 2.11, for each LDC:

- a) Please give the migration information for customers that moved from sales service to transportation service effective November 1, 2008. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- b) Please give the migration information for grain dryer customers that moved from sales service to transportation service effective August 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- c) Please give the migration information for customers that moved from sales service to transportation service effective November 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- d) Please give the migration information for customers that moved from service transportation to sales service effective November 1, 2008. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- e) Please give the migration information for grain dryer customers that moved from transportation service to sales service effective August 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- f) Please give the migration information for customers that moved from transportation service to sales service effective November 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet. Please provide usage and MDCQ in MMBtu.

**RESPONSE**

**Prepared By: Dottie Anderson**

**Title: Managing Supervisor, End User Transportation**

**Phone Number: (217) 535-5626**

See DAS 12.04 Attach.

a.  
**Sales to Transportation Service Effective 11/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	29	134	7,771,223	104,233

b.  
**Sales to Transportation Service Effective 8/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	7	23	1,522,599	59,469

c.  
**Sales to Transportation Service Effective 11/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	131	567	11,247,130	170,145

d.  
**Transportation to Sales Service Effective 11/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	0	0	-	-

e.  
**Transportation to Sales Service Effective 8/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	0	0	-	-

f.  
**Transportation to Sales Service Effective 11/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
Total	0	0	-	-

09-0306 through 09-0311 (Cons.)

**DAS 12.04R with Attach**

**The Ameren Illinois Utilities'  
Response to ICC Staff Data Requests  
Docket Nos. 09-0306 thru 09-0311 (cons.)  
Proposed general increase in electric and gas delivery service rates  
Response Date: 12/11/2009**

DAS 12.04R

With regard to the Companies' response to DAS 2.11, for each LDC:

- a) Please give the migration information for customers that moved from sales service to transportation service effective November 1, 2008. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- b) Please give the migration information for grain dryer customers that moved from sales service to transportation service effective August 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- c) Please give the migration information for customers that moved from sales service to transportation service effective November 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- d) Please give the migration information for customers that moved from service transportation to sales service effective November 1, 2008. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- e) Please give the migration information for grain dryer customers that moved from transportation service to sales service effective August 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- f) Please give the migration information for customers that moved from transportation service to sales service effective November 1, 2009. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet. Please provide usage and MDCQ in MMBtu.

**RESPONSE**

**Prepared By: Dottie Anderson**

**Title: Managing Supervisor, End User Transportation**

**Phone Number: (217) 535-5626**

See DAS 12.04R Attach in excel and pdf versions.

a.  
**Sales to Transportation Service Effective 11/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
IP	12	53	3,408,469	61,347
CILCO	14	61	2,393,537	24,347
CIPS	3	20	1,969,217	18,539
<b>Total</b>	<b>29</b>	<b>134</b>	<b>7,771,223</b>	<b>104,233</b>

b.  
**Sales to Transportation Service Effective 8/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
IP	3	13	998,960	28,119
CILCO	2	4	185,326	14,950
CIPS	2	6	338,313	16,400
<b>Total</b>	<b>7</b>	<b>23</b>	<b>1,522,599</b>	<b>59,469</b>

c.  
**Sales to Transportation Service Effective 11/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
IP	52	194	3,342,913	46,776
CILCO	45	242	6,189,022	66,931
CIPS	34	131	1,715,195	56,438
<b>Total</b>	<b>131</b>	<b>567</b>	<b>11,247,130</b>	<b>170,145</b>

d.  
**Transportation to Sales Service Effective 11/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
<b>Total</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>

e.  
**Transportation to Sales Service Effective 8/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
<b>Total</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>

f.  
**Transportation to Sales Service Effective 11/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
<b>Total</b>	<b>0</b>	<b>0</b>	<b>-</b>	<b>-</b>

09-0306 through 09-0311 (Cons.)

**DAS 12.05**

**The Ameren Illinois Utilities'  
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Docket Nos. 09-0306 thru 09-0311 (cons.)  
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Response Date: 12/10/2009**

DAS 12.05

With regard to Ameren Ex. 64.0, page 18, and Mr. Dothage's statement on lines 523-526 stating, "Mr. Sackett is correct that some customers have elected to switch from sales service to transportation service. He, however, conveniently fails to acknowledge or is unaware of the fact that the AIUs also have had transportation customers elect to switch to sales service":

- a) Was Mr. Dothage aware of the general trends in migration of customers on and off transportation service?
- b) Was Mr. Dothage aware of the information provided in DAS 12.04 above when made?
- c) Please provide the basis for the quoted statement.

**RESPONSE**

**Prepared By: Kenneth C. Dothage**

**Title: Manager, Gas Supply**

**Phone Number: 314-554-2353**

- a) Yes
- b) Yes
- c) Effective 10/1/2008 some AmerenIP customers that were served under Rider OT elected to become system sales customers instead of transportation customers. Mr. Sackett fails to make this acknowledgement in his testimony. While Mr. Sackett may not have been aware of this fact since these conversions occurred on October 1<sup>st</sup> not November 1<sup>st</sup>, the salient point is that Mr. Sackett ignored certain information or was unaware of the existence of such information in arriving at the conclusions contained in portions of his testimony referenced.

**TEE 20.03**

**The Ameren Illinois Utilities'  
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Response Date: 12/8/2009**

TEE 20.03

Referring to Ameren Exhibit 49.0, p. 12, lines 244 – 252,

- a) Does Mr. Nelson believe that the Commission may find some of the uncollectibles expense recorded by the AIU to be imprudent or unreasonable?
- b) Does Mr. Nelson believe that not all of the uncollectibles expense recorded by the AIU are prudent and reasonable costs?

**RESPONSE**

**Prepared By: Craig D. Nelson**

**Title: Vice President, Regulatory Affairs and Financial Services**

**Phone Number: (309) 677-5707**

- a) No. I believe our employees are making a conscientious and thorough effort to collect bad debts and that the uncollectibles expense recorded by the AIUs is prudent and reasonable, however, I do not know what the Illinois Commerce Commission will decide regarding the “prudence and reasonableness” of our “actions to pursue minimization and collection of uncollectibles.”
- b) No. I believe **all** of the expenses recorded in Account 904 are prudent and reasonable, and that the AIUs’ actions to minimize and collect their uncollectibles are also prudent and reasonable.

**TEE 20.04**

**The Ameren Illinois Utilities'  
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Response Date: 12/8/2009**

TEE 20.04

Referring to Ameren Exhibit 49.0, p. 12, lines 255 – 256, does Mr. Nelson believe that there is a difference between the statement that the AIUs were entitled to recover costs and that the AIUs have the opportunity to recover costs? Please explain what the difference is or why no difference exists.

**RESPONSE**

**Prepared By: Craig D. Nelson  
Title: Vice President, Regulatory Affairs and Financial Services  
Phone Number: (309) 677-5707**

My use of the word “entitled” in the above-referenced lines of my testimony means that the AIUs have a right to recover prudently incurred uncollectibles costs. That is, the law “entitles” the AIUs to the “opportunity” to recover their uncollectibles costs. However, as I testified in my surrebuttal testimony, it is the Commission which is responsible for determining whether the AIUs’ uncollectibles expenses are prudent and reasonable which reinforces the fact that there is no guarantee that all such costs will be recovered.

09-0306 through 09-0311 (Cons.)

**TEE 20.08**

**The Ameren Illinois Utilities'**  
**Response to ICC Staff Data Requests**  
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**Proposed general increase in electric and gas delivery service rates**  
**Response Date: 12/8/2009**

TEE 20.08

Referring to Ameren Exhibit 51.0, pp. 13-14, lines 308 -317, provide the calculations for the payroll tax expense amounts by type included as "other savings". If those amounts in total do not equal the total "other savings" reconcile the amounts.

**RESPONSE**

**Prepared By: Ronald D. Stafford**  
**Title: Managing Supervisor Regulatory Accounting**  
**Phone Number: 314-206-0584**

The calculation for the payroll tax expense associated with the workforce reduction was provided within the attachments to AIU Staff data request TEE 18.02 and TEE 18.04. This calculation is also provided within the work papers supporting Ameren Exhibit 51.9. As can be seen on these spreadsheets a factor was used to compute the payroll tax expense. These factors are provided below.

CIL-E	CIP-E	IP-E	CIL-G	CIP-G	IP-G
4.19%	4.61%	5.20%	4.66%	4.79%	5.25%

These factors were calculated by dividing payroll taxes into labor. A factor can be developed for each type of payroll tax by taking the total for each per books tax and the FICA pro forma adjustment. These factors for each type of payroll tax are summarized below.

	<u>CIL-E</u>	<u>CIP-E</u>	<u>IP-E</u>	<u>CIL-G</u>	<u>CIP-G</u>	<u>IP-G</u>
FICA Per Books	3.76%	3.96%	4.57%	3.75%	3.84%	4.16%
FUTA Per Books	0.03%	0.04%	0.03%	0.05%	0.05%	0.08%
SUTA Per Books	-0.13%	0.06%	0.05%	0.30%	0.34%	0.46%
FICA Pro Forma	0.53%	0.55%	0.55%	0.56%	0.56%	0.55%
Total 4.19%		4.61%	5.20%	4.66%	4.79%	5.25%

Within the attached file, TEE 20.07 Attachment, these factors are used to calculate the payroll tax amounts by type included as "other savings" within Ameren Exhibit 51.9. As can be seen in this attachment these amounts in total equal the total "other savings" within Ameren Exhibit 51.9.

In preparing this response, it was noted that payroll taxes on incentive compensation were inadvertently excluded in the calculation shown on Ameren Exhibit 51.9. Based upon a review of the Exhibit 51.9 workpaper, incentive compensation related payroll taxes

summarized on the 18.02 AIU and 18.04 AIU tabs total \$20,397. Multiplying this total by the 76.59% percent of total incentive compensation in revenue requirement from Schedule 7 Percent IC results in a \$15,621 understatement of the payroll taxes adjustment related to workforce reductions included on Ameren Exhibits 51.1 through 51.6 (Revised) and Ameren Exhibit 51.9.

Staff Group Cross Ex 1-DD

	<b>CIL-E</b>	<b>CIP-E</b>	<b>IP-E</b>	<b>CIL-G</b>	<b>CIP-G</b>	<b>IP-G</b>
FICA Per Books	3.76%	3.96%	4.57%	3.75%	3.84%	4.16%
FUTA Per Books	0.03%	0.04%	0.03%	0.05%	0.05%	0.08%
SUTA Per Books	-0.13%	0.06%	0.05%	0.30%	0.34%	0.46%
FICA Pro Forma	0.53%	0.55%	0.55%	0.56%	0.56%	0.55%
Total	4.19%	4.61%	5.20%	4.66%	4.79%	5.25%

AmerenCILCO - Electric  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 490,861	\$ 224,082	Ameren Ex. 51.9
2	FICA Per Books	\$ 18,456	\$ 8,425	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	147	67	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	(638)	(291)	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	2,602	1,188	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 20,567	\$ 9,389	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 20,567	\$ 9,389	Ameren Ex. 51.9

AmerenCIPS - Electric  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 283,399	\$ 418,338	Ameren Ex. 51.9
2	FICA Per Books	\$ 11,223	\$ 16,566	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	113	167	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	170	251	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	1,559	2,301	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 13,065	\$ 19,285	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 13,065	\$ 19,285	Ameren Ex. 51.9

AmerenIP - Electric  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 41,169	\$ 343,437	Ameren Ex. 51.9
2	FICA Per Books	\$ 1,881	\$ 15,695	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	12	103	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	21	172	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	226	1,889	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 2,141	\$ 17,859	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 2,141	\$ 17,859	Ameren Ex. 51.9

AmerenCILCO - Gas  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 614,349	\$ 166,727	Ameren Ex. 51.9
2	FICA Per Books	\$ 23,038	\$ 6,252	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	307	83	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	1,843	500	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	3,440	934	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 28,629	\$ 7,769	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 28,629	\$ 7,769	Ameren Ex. 51.9

AmerenCIPS - Gas  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 119,901	\$ 251,114	Ameren Ex. 51.9
2	FICA Per Books	\$ 4,604	\$ 9,643	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	60	126	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	408	854	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	671	1,406	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 5,743	\$ 12,028	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 5,743	\$ 12,028	Ameren Ex. 51.9

AmerenIP - Gas  
 Adjustment for Workforce Reduction  
 For the Test Year Ending 12/31/2008

<u>Line No.</u>	<u>Description</u> (a)	<u>AIU Amount</u> (b)	<u>AMS Amount</u> (c)	<u>Source</u> (d)
1	<b>Total Salaries</b>	\$ 23,531	\$ 196,543	Ameren Ex. 51.9
2	FICA Per Books	\$ 979	\$ 8,176	Line 1 * Percentage on Payroll Tax Summary tab
3	FUTA Per Books	19	157	Line 1 * Percentage on Payroll Tax Summary tab
4	SUTA Per Books	108	904	Line 1 * Percentage on Payroll Tax Summary tab
5	FICA Pro Forma	129	1,081	Line 1 * Percentage on Payroll Tax Summary tab
6	Total	\$ 1,235	\$ 10,318	Line 1 * Percentage on Payroll Tax Summary tab
7	<b>Total Taxes (Other Savings)</b>	\$ 1,235	\$ 10,318	Ameren Ex. 51.9

Staff Group Cross Ex. 1-EE

09-0306 through 09-0311 (Cons.)

**TEE 20.13**

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TEE 20.13

Referring to Ameren Exhibit 67.0, p. 8, lines 167 – 169, provide examples of adjustments associated with the gross revenue conversion factor (“GRCF”) that will be known once the Final Order and Appendices for the rate cases are final given that there are no longer contested issues related to the uncollectibles rate or the tax rates that are the basis for GRCF.

**RESPONSE**  
**Prepared By: Robert J. Mill**  
**Title: Director, Regulatory Policy and Rates**  
**Phone Number: 314-554-3734**

The referenced lines of Mr. Mill’s testimony are not intended to indicate a contested issue with the GRCF exists. Rather, the reference to the GRCF is intended to clarify that the estimates of the per customer, per month dollar amounts of base rate uncollectible expense embedded in the customer charge as estimated for each rate class by the AIUs witnesses Leonard Jones and Peter Millburg, do not reflect the uncollectible component associated with the rate increase amounts. The final per customer, per month uncollectible amounts will be based on the amounts stated for uncollectible accounts in the “Operating Statement per Order” column of the Appendices to the Order in these proceedings.

Staff Group Cross Ex 1-FF

09-0306 through 09-0311 (Cons.)

**DAS 13.02**

**The Ameren Illinois Utilities'  
Response to ICC Staff Data Requests  
Docket Nos. 09-0306 thru 09-0311 (cons.)  
Proposed general increase in electric and gas delivery service rates  
Response Date: 12/13/2009**

DAS 13.02

With regard to the Mr. Normand's response to DAS 12.02:

- a) Hypothetical: If a transportation customer nominates 1000 MMBtu and only uses 900 MMBtu on that day, what is the bank activity for this customer under Ameren's Rider T?
- b) Hypothetical: If a transportation customer nominates 1000 MMBtu and uses 1100 MMBtu on that day, what is the bank activity for this customer under Ameren's Rider T?
- c) Can a transportation customer withdraw gas from its bank under any circumstances when its usage does not exceed its DCN? Explain or provide an example.

**RESPONSE**

**Prepared By: Paul M. Normand  
Title: President, Management Applications Consulting, Inc.  
Phone Number: (610) 670-9199**

Mr. Normand's response to DAS 12.02 reflects the fact that the use of DCN levels as a cost responsibility level for transportation customers is inappropriate, misleading, and materially understates any equitable cost assignment to transportation customers. With respect to the requested hypothetical:

- a) Increase in bank, provided customer is not at their bank limit.
- b) Decrease in bank, provided customer has a bank.
- c) No. See response a.

Staff Group Cross Ex 1-GG

09-0306 through 09-0311 (Cons.)

**DAS 13.03 with Attach**

**The Ameren Illinois Utilities'**  
**Response to ICC Staff Data Requests**  
**Docket Nos. 09-0306 thru 09-0311 (cons.)**  
**Proposed general increase in electric and gas delivery service rates**  
**Response Date: 12/13/2009**

DAS 13.03

With regard to the Companies' response to DAS 2.11, for each LDC:

- a) Please give the migration information for customers that moved from sales service to transportation service at any time since the order from 07-0585c went into effect unless already provided. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- b) Please give the migration information for customers that moved from service transportation to sales service effective October 1, 2008. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet.
- c) Please give the migration information for customers that moved from transportation service to sales service at any time since the order from 07-06585c went into effect, unless already provided. Please provide non-confidential summary data that shows count of customers, accounts, annual usage and MDCQ as a group. Please provide this summary in both PDF and Excel spreadsheet. Please provide usage and MDCQ in MMBtu.

**RESPONSE**

**Prepared By: Dottie Anderson**  
**Title: Managing Supervisor, End User Transportation**  
**Phone Number: (217) 535-5626**

See attached Excel spreadsheet.

**DAS - 13.03**

a.

**Sales to Transportation Service Effective 1/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms) 11 months	MDCQ (therms)
IP	1	1	14,070	69
CILCO	0	0	-	-
CIPS	0	0	-	-
<b>Total</b>	<b>1</b>	<b>1</b>	<b>14,070</b>	<b>69</b>

**Sales to Transportation Service Effective 2/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms) 10 months	MDCQ (therms)
IP	0	0	-	-
CILCO	0	0	-	-
CIPS	1	1	7,133	1,000
<b>Total</b>	<b>1</b>	<b>1</b>	<b>7,133</b>	<b>1,000</b>

**Sales to Transportation Service Effective 7/1/09**

	Number of Customers	Number of Accounts	Annual Usage (therms) 5 months	MDCQ (therms)
IP	1	1	12,255,990	99,160
CILCO	0	0	-	-
CIPS	0	0	-	-
<b>Total</b>	<b>1</b>	<b>1</b>	<b>12,255,990</b>	<b>99,160</b>

**Rider OT to Rider T Effective 10/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
IP	67	123	28,145,603	325,445

b.

**Transportation Service (Rider OT) to Sales Service Effective 10/1/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
IP	14	21	5,048,330	67,702
CILCO	0	0	-	-
CIPS	0	0	-	-
<b>Total</b>	<b>14</b>	<b>21</b>	<b>5,048,330</b>	<b>67,702</b>

c.

**Transportation Service to Sales Service After 10/08**

	Number of Customers	Number of Accounts	Annual Usage (therms)	MDCQ (therms)
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Staff Group Cross Ex 1-GG

ICC Docket Nos. 09-0306 - 09-0311 (cons)

DAS 13.03 Attach

	<u>Customers</u>	<u>Accounts</u>	<u>Usage (therms)</u>	<u>(therms)</u>	
IP	0	0	-	-	
CILCO	1	3	7,643,000	-	Special contract
CIPS	0	0	-	-	
Total	1	3	7,643,000	-	

**DAS 14.01**

**The Ameren Illinois Utilities'**  
**Response to ICC Staff Data Requests**  
**Docket Nos. 09-0306 thru 09-0311 (cons.)**  
**Proposed general increase in electric and gas delivery service rates**  
**Response Date: 12/14/2009**

DAS 14.01

1) If each of the AIUs revised Rider T of its gas transportation tariff as set out below (new text underlined) and if the AIUs did not plan to materially alter their computer systems to automate the receipt of "Same-Day" nominations, does the AIU witness Dothage believe such a change would be a reasonable resolution to the issues of intraday gas nominations for transportation customers as those matters were addressed by AIU witness Dothage, Staff witness Sackett, and CNE-Gas witness Kawczynski?

NOMINATIONS OF CUSTOMER-OWNED GAS Nominations for transportation of Customer-Owned Gas to Customer's Premises shall conform to Company's current form and must include Customer's name, city, nomination date, point of usage, Final Pipeline Transporter, Shipper, contract/account number with Final Pipeline Transporter, Therms per day, and day(s) of delivery. Customer may appoint a nominating agent, but Customer retains responsibility for Nominations as described herein. The Maximum Daily Nomination for a Monthly Balanced transportation Customer is two times Customers MDCQ.

A. Nomination Deadlines

1. Month-Ahead

Prior to 11:30 a.m. CST on the second Business day proceeding the first day of each calendar month, Customer desiring Company to transport Customer-Owned Gas shall notify Company of the Therms of Customer-Owned Gas desired by Customer to be transported to Customer's Premises by Company for each day during the next calendar month.

2. Day-Ahead

Customer desiring a change of Nomination for transportation of Customer-Owned Gas shall notify Company by 11:30 a.m. CST of the preceding business day, subject to confirmation by the pipeline.

3. Intra-Day

Customer desiring a change in Nomination for transportation of Customer-Owned Gas after the Day-Ahead deadline specified above shall notify Company by 4:00 P.M. CST of the preceding business day, subject to confirmation by the pipeline. Company may accept such change to Customer's Nomination if the Company determines in its sole discretion that such a change to Nomination will not adversely impact the operation of the Company's gas system or adversely impact Company's purchase and receipt of gas for other Rates or Riders.

4. Same-Day

Customer desiring a change in Nomination for transportation of Customer-Owned Gas after the Intra-Day deadline specified above shall notify Company by 7:30 A.M. CST of the business day on which the Nomination is to take effect, subject to confirmation by the pipeline. Company may accept such change to Customer's Nomination if the Company determines in its sole discretion that such a change to Nomination will not adversely impact the operation of the Company's gas system or adversely impact Company's purchase and receipt of gas for other Rates or Riders. The Company will use its best effort to accept nominations for transportation of Customer-Owned Gas at all other times, subject to confirmation by the interstate pipeline.

2). If each of the AIUs revised Rider T of its gas transportation tariff as set in question 1 above, would the AIUs plan to materially alter their computer systems to automate the receipt of "Same-Day" nominations?

**RESPONSE**

**Prepared By: Kenneth C. Dothage**

**Title: Manager, Gas Supply**

**Phone Number: 314-554-2353**

1). Yes

2). No