Ameren Illinois Company
Response to AG Data Requests
Docket No. 10-0568
Verified Petition for Approval of Integrated Electric and Natural Gas Energy Efficiency Plan.
Response Date: 11/17/2010

AG 2.01

Please provide a breakdown by dollar amount and of the percentage of Ameren's electric and gas energy efficiency plan costs that constitute "administrative costs", including all workpapers and documents that support said percentage, assuming "administrative cost" is defined as follows: Administrative Cost. An administrative cost is a cost that may be incurred by a Program Administrator, Contractor or Subcontractor that is not easily chargeable to a specific program, but benefits all functions of the Program Administrator, Contractor or Subcontractor. Administrative costs should be charged to different programs and/or functions using a consistent pre-defined basis. Examples of administrative costs include: Managerial and Clerical Labor; Human Resources Support and Development; Travel and Conference Fees; Overhead (General and Administrative); Equipment (e.g., communications, computing, copying, general office, transportation, etc.); Food Service; Office Supplies and Postage; Labor (e.g., accounting, facilities management, procurement, administrative, communications, information technology, telecommunications, etc.)

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

Portfolio level administrative costs are calculated as 5% of Total Program costs, as defined in Table 16 of Ameren Exhibit 1.1. This percentage has been shown to be reasonable by Ameren Illinois' program experience in Cycle 1. These costs are associated with labor, time, materials, and other direct costs necessary to manage the overall portfolio. Appendix C of Ameren Exhibit 1.1 provides an estimate of how these portfolio level costs may be distributed on a program basis. The yearly dollar amounts for the entire portfolio are given in the table below.

	PY4	PY5	PY6
Ameren Illinois - Portfolio Admin costs	$ 2,200,191	$ 2,253,252	$ 2,294,792

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AG 2.02

Please provide a breakdown by dollar amount and of the percentage of Ameren's electric and gas energy efficiency plan costs that constitute "marketing costs", including all workpapers and documents that support said percentage, assuming "marketing cost" is defined as follows: Marketing Cost. The term marketing costs means the costs of marketing, outreach, customer service and business development. It includes the costs for: Full-service marketing services, concepts and campaign strategy planning; developing a marketing plan, timeline, budget and progress reports; coordination of all marketing activities, including scheduling events, media buys, etc.; program promotional materials, including education and training events; web site; developing a request for proposal for procuring contracts; public relations, including community relations.

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

Portfolio marketing costs are calculated as 2.5% of Total Program costs, as defined in Table 16 of Ameren Exhibit 1.1. This percentage has been shown to be reasonable by Ameren Illinois' program experience in Cycle 1. Appendix C of Ameren Exhibit 1.1 provides an estimate of how these portfolio level costs may be distributed on a program basis. The yearly dollar amounts for the entire portfolio are given in the table below.

	PY4	PY5	PY6
Ameren Illinois Total Portfolio Marketing costs	$ 1,101,821	$ 1,128,404	$ 1,149,227

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AG 2.03

Please provide a breakdown by dollar amount and of the percentage of Ameren's electric and gas energy efficiency plan costs that constitute "evaluation costs", including all workpapers and documents that support said percentage, assuming "evaluation cost" is defined as follows: Evaluation Cost. The term Evaluation costs means the costs incurred to aid the Evaluator in performing duties for the Program (e.g., verifying energy savings). It includes costs related to: Development of ongoing evaluation plan; Evaluation of energy-efficiency programming efforts; Reporting-related requirements; Coordination with selected advisory groups; Costs incurred to collect data for evaluation

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

Evaluation costs are calculated as 3% of Total Program costs as defined in Table 16 of Ameren Exhibit 1.1. This level is set to acknowledge the constraints required by the Illinois Public Utilities Act. Appendix C of Ameren Exhibit 1.1 provides an estimate of how these portfolio level costs may be distributed on a program basis. The yearly dollar amounts for the entire portfolio are given in the table below.

	PY4	PY5	PY6
Ameren Illinois Total Portfolio Evaluation costs	$ 1,322,186	$ 1,354,084	$ 1,379,072

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CUB 2.05

Please provide all documents, studies and work papers that explain why the Company plans to increase administrative costs for its business programs. Ameren Exhibit 1.1 at 9.

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

Objection. This request is unduly burdensome to the extent it calls for "all" documents or studies regardless of whether they are in the possession of Ameren Illinois. Notwithstanding that objection, Ameren Illinois states that business administrative costs are increasing as a result of several factors. Ameren Illinois notes that it bases these increases, in part, on conversations and communications between Mr. Costenaro and others on the Ameren Illinois planning team. The first of these factors is the introduction of a comprehensive motors program. See CUB 2.05 Attach for a descriptive report. The costs are also increasing due to increased portfolio customer education budget to overcome market inertia brought about by a sluggish economy. For related details, please refer to "Ameren Ex 1.1" section 3.2 on pg 58 discussing the program ally network and "Ameren Ex 1.1" section 5.2.1 on pages 81-83 discussing increased incentives. Additionally, a decrease in lighting opportunities (most notably T8's becoming part of federal standards) shifts the program mix to include more sophisticated measures with costly and more complex delivery mechanisms.

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CUB 2.06

Company Ex. 4.1 discusses proposed modifications to Rider GER. Included in costs which will be recovered through Rider GER are "all costs prudently incurred by the Company in association with any on-bill financing program described in . . . Section 19-140."

a) Does the Company anticipate any such costs being recovered in Plan Years 4 through 6?
b) Does the Company intend to recover costs related to both gas and electric on-bill financing programs in Rider GER?
c) Please explain what the Company means by "on-bill financing is under development." AIU Ex. 1.1 at 57.
d) Does the Company anticipate offering an on-bill financing program in Plan Years 4 through 6? If so, when does the Company anticipate the program beginning, and how does the program relate to the Plan?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service & Energy Efficiency
Phone Number: 309-677-5562

a) Yes.
b) No. Rider GER will only recover on-bill financing costs associated with natural gas measures costs. In the case certain costs are considered joint costs and as stated in the "Incremental Costs" section Rider GER, the proportion of joint costs allocated and recovered through Rider GER will be equal to the proportion of maximum on-bill financing permitted for a gas utility to maximum gas on-bill financing and maximum electric utility on-bill financing, permitted pursuant to Section 19-140(c)(7) of the Act and Section 16-111.7(c)(7) of the Act, respectively. At the current levels set by the Act, 50% of joint costs will be allocated and recovered through Rider GER, the remaining 50% will be recovered through Rider EDR.
c) Sections 16-111.7 and 19-140 of the 220 ILCS 5/ Public Utilities Act requires that utilities develop an on-bill financing program. As per the legislation and the resulting Order (Docket #10-0095) Ameren Illinois is proceeding in the development of the on-bill financing program.
d) As per Docket #10-0095 and the resulting Order, the availability of an on-bill financing program is subject the results of the RFP process, contract negotiation

with the financial institution and successful project implementation. Assuming the completion of the previously stated activities, we anticipate the program to start in PY4. Without the completion and results of these activities, we can not yet determine how it relates to the Plan.

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CUB 2.07

Keith Martin testifies as to the impact of the Energy Independence and Security Act of 2007 on the Company's ability to achieve its targets. Ameren Exhibit 1.0 at 13. Please provide all documents, studies, and work papers that support the following statement, "In regards to portfolio risk, this legislation will increase the number of free riders (those who would install the measure regardless or utility incentive), thus, significantly decreasing the savings attributable to the portfolio."

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

Objection. This request is unduly broad to the extent it asks for "all" documents and studies regardless of whether they are in Ameren Illinois' possession. Notwithstanding that objection, see CUB 2.07 Attach for a copy of the Technical Reference Manual from Ohio. Within this document, NTG factors are 0.58 for 2010 installations, and 0.50 for installations in 2011, indicating that between 42% and 50% of those persons purchasing CFLs will be freeriders. Conversations within the Ameren Illinois planning team as well as with third parties (including Consortium for Energy Efficiency and the American Council for an Energy Efficient Economy) also indicate that other jurisdictions are scaling back CFL installations and increasing the percentage of freeriders due to provisions in the Energy Independence and Security Act of 2007 (EISA).

- Massachusetts: recently reduced NTG for general service CFLs to 0.25, and offered very limited support for specialty bulbs. The major program affected was the MASSAVES Residential Lighting Program.
- Arkansas: Attorney General's office testified to PUC that the CFL market is transformed.
- California: CPUC draft plan recommends a 10% reduction in bulbs attributed to the portfolio and no CFL incentives after 2012.
- Connecticut: the Commission decided that standard CFL programs will be suspended in 2010 (specialty bulbs are allowed).
- Texas – CPS Energy is questioning whether to continue CFL incentives.

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CUB 2.16

The Company's Plan references "secondary market research from a major lighting manufacturer" related to adjusting its Residential Lighting program. Please provide all documents, studies and work papers related to this secondary market research. Ameren Exhibit 1.1 at 49.

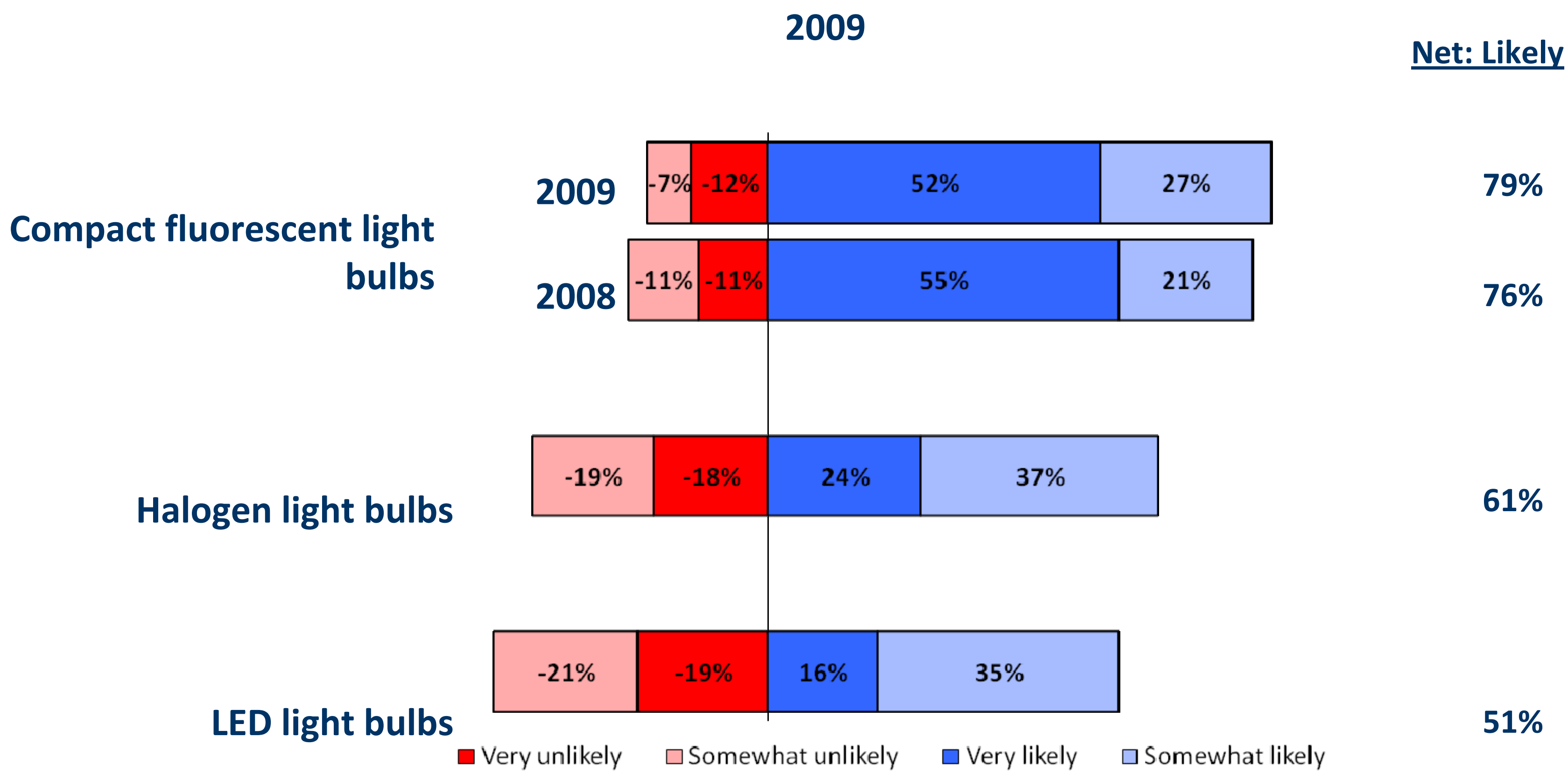
RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

See CUB 2.16 Attach 1 and Attach 2. Ameren Illinois notes that it has had other confidential and proprietary communication with certain major lighting manufacturers, including Sylvania, that would be needlessly cumulative and unduly burdensome to produce.

Consumers are more likely to purchase CFLs in the future than other types of new technology bulbs

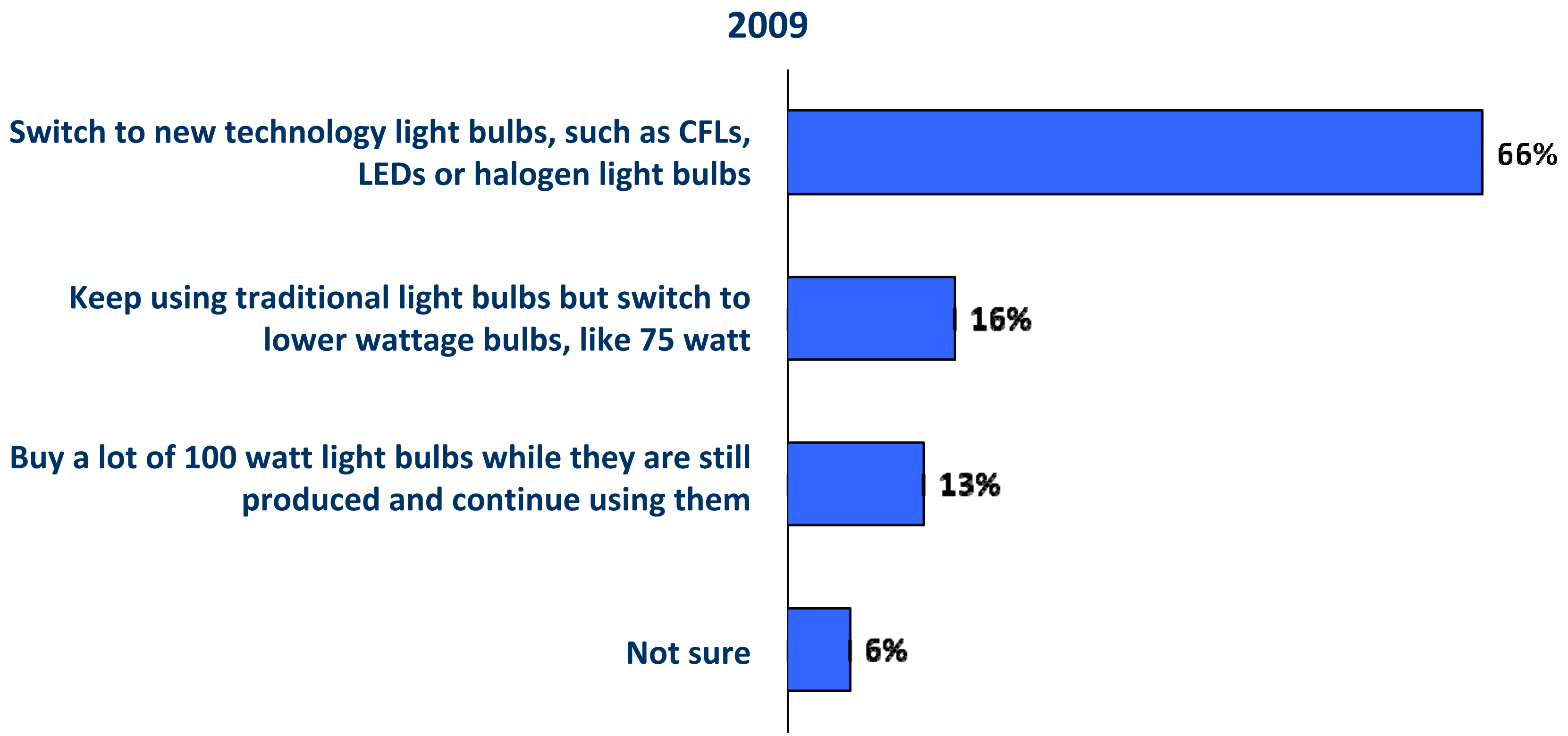
Q7. How likely are you to purchase a _____ in the future?



Base: 2008 N=301; 2009 N=302

Consumers are most likely to switch to new technology light bulbs once traditional light bulbs are phased out…

Q12. When traditional 100-watt light bulbs are eliminated, which ONE of the following are you most likely to do?



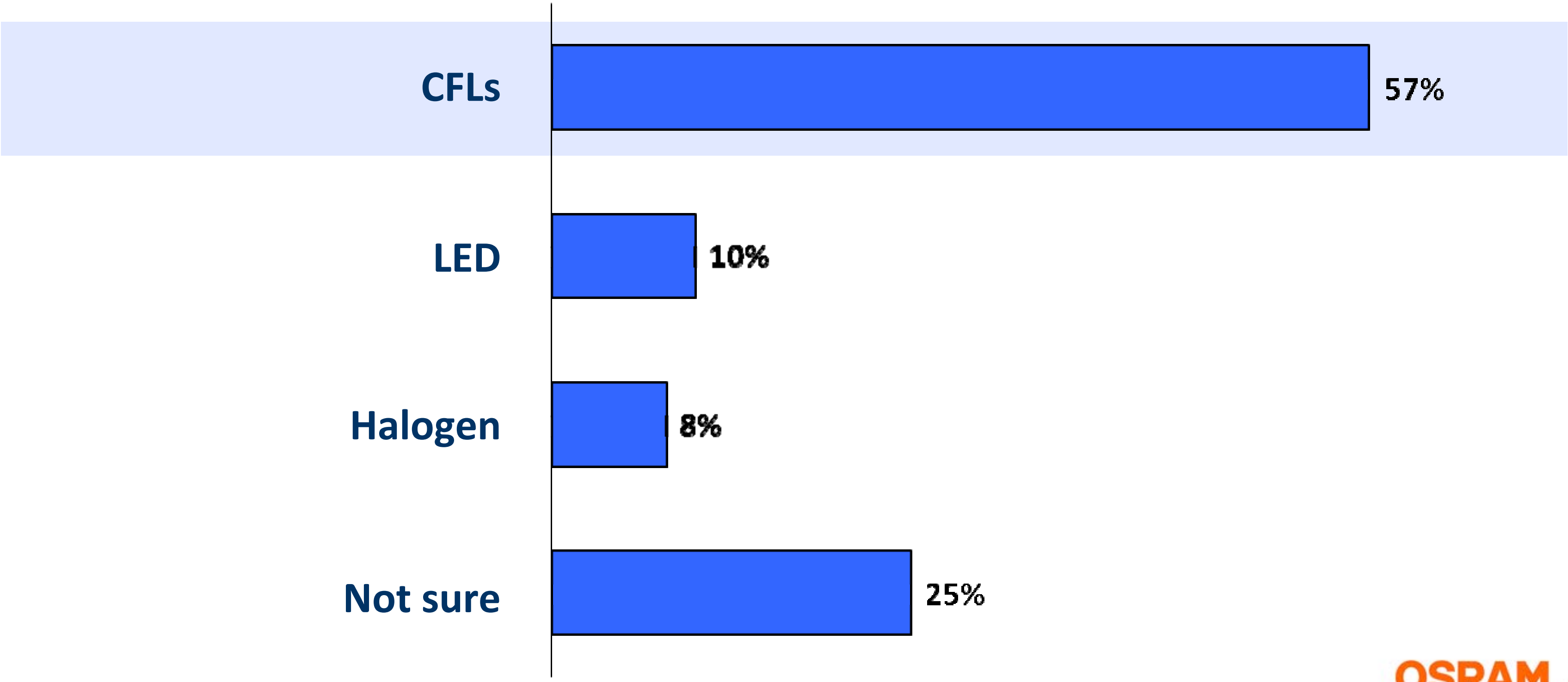
Base: 2009 N=302

OSRAM SYLVANIA

…And CFLs are the most likely choice

Q13. You said you're most likely to switch to a new technology light bulb. Which type of new technology light bulb are you most likely to switch to: LED, halogen, or CFLs or are you not sure yet?

2009



Base: 2009 N=199

OSRAM SYLVANIA

Ameren Illinois Company
Response to Energy & Law Policy Center ("ELPC") Data Requests
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ELPC 1.12

Mr. Costenaro in his direct testimony (lines 143-145) states that the incremental measure cost is sometimes defined as the full cost.

a) Does Ameren Illinois have any written guidelines regarding when to define the incremental cost as the full cost? If so, please provide them.
b) Mr. Costenaro provides an example of a commercial customer retrofitting an existing set of lighting fixtures with more efficient ones as an illustration of the incremental costs being defined as the full cost. If the commercial customer were remodeling and replacing the existing fixtures for aesthetic reasons, leaving the customer with choice of high efficiency or standard efficiency aesthetic lighting fixtures, would Ameren Illinois agree that the incremental cost would be the difference between the standard and high efficiency fixtures? Please explain.

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

a) While there are no written guidelines so to speak, the general guideline applied by Ameren Illinois is that the measure cost depends on the manner in which the measure is implemented. When a customer is necessarily faced with a purchase decision, the measure cost is the incremental cost between the efficient and the standard option. This is because there will be a non-zero expenditure whether the customer chooses efficient or standard. However, for newly added measures, like a lighting control system that did not previously exist, or for early replacement measures, like early replacement of commercial lighting fixtures, the incremental costs usually are the whole amount of the new efficient equipment being purchased.

b) The cost of implementing a measure, whether full or incremental, is given as a data element in the Ameren Illinois Master Measure database, which is comprised of the various sources described in lines 102-128 of Ameren Ex. 2.0 – Direct Testimony of David M. Costenaro. The values came directly from these sources with general assumptions about the typical implementation of each measure. In the case described in the data request, if the hypothetical customer was necessarily faced with a purchase decision, then yes, the measure cost would be the incremental between an efficient and standard fixture.

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JLH 5.01

If modified energy savings goals are approved, is it the Company's position that if the budget has not been exhausted (e.g., only half of the electric budget has been spent), and the Company determines that it has met its modified energy savings goal for the plan year, it will continue incentives for measures that result in electric savings up to the original electric savings target (that the Company is requesting to have modified in this docket)? Please explain. Who makes that determination at the Company?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

It is the Company’s position that all possible savings will be maximized within the spend limit. All budget funds will be exhausted to achieve, or exceed, modified goals to the extent possible per the spend limit. Keith Martin, Manager of Customer Service and Energy Efficiency, makes this determination in consultation with Company executives.

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JLH 5.02

When answering this question, please assume that the Commission has approved the modified EM&V framework proposed by Ameren witness Mr. Weaver in Ameren Exhibit 10.0.

a) How does the Company plan to determine what measure level savings value to use when measures being incentivized in PY4 do not exactly match the measures previously deemed by the Commission (if the Commission has deemed the values proposed by the Company)? Who would make that determination?
b) After contracts with program implementers have been negotiated and signed, is the Company willing to provide a list to the SAG towards the beginning of the plan year that encompasses all measures that incentives are planned to be paid along with the "deemed" measure level savings values associated with each of these measures and have the list divided up by program? If new measures are introduced to a program, would the Company be willing to provide the updates to the list associated with the deemed measure level savings value to the SAG quarterly?

RESPONSE

Prepared By: Keith Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

a) In the event there is a measure in the portfolio that does not match the deemed measure list, the Company will obtain the recommended measure savings from the independent EM&V evaluator. Please note that Mr. Weaver proposes in his Rebuttal Testimony that measure level savings will now only be deemed for one year, subject to annual revision by EM&V and applied prospectively for standard measures and retrospectively for non-standard measures. (Ameren Ex. 10, lines 315-326)

b) Yes, however Ameren Illinois proposes that such a process is not warranted as per Mr. Weaver's revised EM&V framework in his Rebuttal Testimony where measure level savings will be revised annually by EM&V and applied prospectively for standard measures and retrospectively for non-standard measures. (Ameren Ex. 10, lines 315-326)

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JLH 5.03

In Mr. Weaver's Rebuttal Testimony (Ameren Ex. 10.0), he proposes that Staff and Stakeholders provide input to the Technical Resource Manual. Is it the Company's position that it would be willing to work with ComEd regarding a consistent format to present its TRM in (to allow for easy comparison among companies) where feasible? For example, for similar programs with similar measures across the companies, could a set of minimum descriptive items to include in the TRM for a particular set of measures be agreed upon between the companies (e.g., Program, Measure Name, Description, Sector, Base Case, Measure Case, Unit of Participation, kWh Savings per Participant, kW Savings per Participant, NTG, Incremental Cost per Participant, HOU, Length) to allow for ease of comparison in the assumptions that each company is using?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

Yes, however Ameren Illinois will also have TRM items as they relate to the gas measures by virtue of having an integrated portfolio.

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JLH 5.04

Please provide the appendices to the DSM potential study referred to at footnote 1 on page 4 of Company witness Mr. Costenaro's direct testimony (Ameren Ex. 2.0; "ASSESSMENT OF ELECTRIC AND NATURAL GAS ENERGY-EFFICIENCY POTENTIAL (2010–2016), Appendices Volume II"). In particular, please provide Appendix D and E.1 in Excel format.

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

See JLH 5.04 Attach 1 for the Appendices to the ASSESSMENT OF ELECTRIC AND NATURAL GAS ENERGY-EFFICIENCY POTENTIAL (2010–2016). See also JLH 5.04 Attach 2 and 3 for the excel versions of Appendix D and E.1, respectively.

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JLH 5.05

Please refer to the following when answering this question. Staff Data Request JLH 3.03(e) requests the following information: Annual kWh savings values (and associated annual operating hours) for lighting technology measures were the only energy savings values that the Commission deemed for the electric energy efficiency Plan 1 (PY123) in ICC Docket No. 07-0539. Please provide an unlocked Excel spreadsheet indicating all discrepancies in kWh savings values for the same lighting technology measures deemed in Docket No. 07-0539 as compared with those proposed Pre-EISA kWh savings values for lighting technologies requested to be deemed in this docket. For any discrepancy, please provide all workpapers related to studies that would lead to these changes (e.g., Ameren Lighting Logger studies). In Ameren's Response to Staff Data Request JLH 3.03(e), Keith Martin states: The retail savings represented in the deemed values (Docket No. 07-0539, Ameren Ex. 4.0-Revised, Page 38-45, Table 7) were not used by the Ameren Illinois program. This was due to the following factors; the number of lighting combinations (total of 37), the fact that there are a myriad of other potential combinations of base versus efficient technologies that are not represented in the table, the single (limited) sector that was represented (retail-small), and reliance in many cases on customer self-reported information as to the base technology for the business sector. Very few discrepancies exist when comparing the Plan 1 fixed CFL savings to the Plan 2 proposed fixed CFL savings. Most discrepancies are due to a rounding factor. Some savings values are lower for Plan 2 as compared to Plan 1. There are only 15 instances where values are higher for Plan 2 as compared to Plan 1. Ameren Illinois does not have any work papers to explain these differences.

a) Does the Company believe it to be reasonable to request the Commission deem new values for the same measures that the Commission previously deemed without any basis for the changes to these values?
b) Based on Mr. Martin's Response to Staff Data Request JLH 3.03(e), considering the Company chose not to use any of the deemed values in the Ameren Illinois lighting program evaluation in Plan 1, what is the basis for the Company proposing measure level savings values to be deemed (fixed) for PY4 if the Company is able to "choose" whether they wish to apply these deemed values?
c) Is the Company opposed to the Commission not changing the previously deemed measure level savings values?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

a) Yes. As quoted above, “There are only 15 instances where values are higher for Plan 2 as compared to Plan 1”. However Ameren Illinois further notes that the proposed Plan 2 lighting values are gross values. Once the proposed fixed NTG ratios are applied, all proposed Plan 2 gross savings values are much lower or equal to Plan 1 deemed values with the exception of 3 specialty bulbs in Year 4 only (see Exhibit spreadsheet titled “Ameren Illinois Fixed Savings Comparison with NTG applied). It is important to note that when applying Mr. Weaver’s proposed EM&V framework, CFL values will be revised annually by EM&V.

b) The company <u>did</u> use the all the deemed lighting values from Plan 1 except for the <u>retail</u> (business) lighting values as quoted in Mr. Martin’s statement above. Mr. Martin provided an explanation (above) as to why using the deemed values for retail/business applications was not appropriate.

c) No.

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JLH 5.06

Are all measure level savings values that Ameren has proposed the Commission deem in this docket considered cost effective according to the TRC test?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

Yes.

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JLH 5.07

Please describe how dual fuel savings energy efficiency programs are targeted (marketed) to Ameren's electric and gas customers, electric only customers, and gas only customers ("3 customer groups"). For example, are bill inserts targeted to each of the 3 customer groups according to a particular formula? Please explain how the benefit and cost allocations briefly mentioned in Mr. Costenaro's direct testimony (Ameren Ex. 2.0 at 16:341-17:362) are taken into consideration when the Company is determining which of the 3 customer groups to market its energy efficiency programs to.

RESPONSE

Prepared By: Kenneth C. Woolcutt
Title: Managing Supervisor, Energy Efficiency
Phone Number: (309) 677-5001

Ameren Illinois will market its energy efficiency programs to customers with consideration given to fuel source as well as program design. This approach will allow for targeted marketing to customers by fuel source while maintaining the flexibility to leverage program ally transactional relationships. No set formula or construct would allow for the needed flexibility in the marketing of programs. For example, the Energy Star new Homes program would have a two pronged approach – gas and electric customers and home builders. The program would target gas and electric customers with bill inserts, print ads, booths, home shows, and other media - such as video running on the ActOnEnergy website and Youtube. The program would also target home builders in an attempt to inform and educate them on the merits of Energy Star construction methods through direct mail, email, meetings, home shows, booths, and webinars.

Ameren Illinois will allocate marketing costs to by source BTU savings similar to Mr. Costenaro's testimony which provides an explanation of program measure benefit and cost allocation used primarily for incentive budgets.

In the example given, the Energy Star New Homes program derives the majority of savings from gas with smaller savings attributable to electric. This program would allocate its marketing costs by the percentage of savings derived from gas and electric with the majority of costs attributed to gas. Ameren Illinois is, however open to other suggestions of methods of cost allocation which allow for flexibility.

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JLH 5.08

Is it the Company's position that it does not oppose the Commission order Ameren to implement only cost effective measures, where the cost effectiveness of the measure is determined prior to implementation (e.g., the results from the measure screening for cost effectiveness in this filed Plan)?

RESPONSE

Prepared By: Keith A. Martin
Title: Manager, Customer Service and Energy Efficiency
Phone Number: 309-677-5045

We are not opposed to a Commission Order that directs Ameren to implement only those measures that pass the cost-effectiveness screen for planning purposes and are determined cost-effective prior to implementation. As stated in Mr. Costenaro's Rebuttal Testimony, lines 265-280, "The clarification that Ameren Illinois seeks is in regards to planned values vs. evaluated, ex post values. Ameren Illinois agrees with Ms. Hinman's statement that all planned measures should be cost-effective. If there is a criterion for evaluated, *ex post* values to be cost-effective, Ameren Illinois requests that criterion should apply only at the portfolio level. We believe this criterion is consistent with 220 ILCS 5/ 8-103(f)(5) requiring the utility to "Demonstrate that its overall portfolio of energy efficiency and demand response measures, not including items covered by item (4) of this subsection (f), are cost-effective using the total resource cost test and represents a diverse cross-section of opportunities for customers of all rate classes to participate in the programs." Ameren Illinois requests this in Order to avoid a scenario where prudently planned expenditures are disallowed. An example of such disallowance might be if the evaluated cost-effectiveness of an individual measure drops due to a change in market conditions during the implementation period."

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JLH 5.09

Regarding Ameren Ex. 7.0 at 4:75-83, is Mr. Costenaro aware that ComEd’s proposed NTG ratios were based to some extent on the results from its PY1 and PY2 evaluations and that its PY2 evaluation included 201 CFL purchasers surveyed via telephone and 307 CFL purchasers surveyed via in-store intercept for a total of 508 CFL Purchasers surveyed, which is actually 5 times the amount of observations used in Ameren’s evaluation?

RESPONSE

Prepared By: David M. Costenaro
Title: Sr. Planning Consultant, DSM
Phone Number: (314) 554-4550

No.

Ameren Illinois Company
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RZ 1.01

This data request seeks information on the number of Therms (or estimated Therms) and the amount of revenue (or estimated revenue) associated with natural gas delivered by the utility (Ameren), categorized in one of several different categories depending on whether the gas is purchased from the "utility (PGA)," "certified alternative gas suppliers," or "uncertified alternative gas suppliers," and on whether the gas is delivered to "small customers" or "large customers," as these five terms are strictly defined, below. Please note the time frames specified in the second line of each table's title. Also, please note that the sums provided should not include those Therms or Dollars of "self-directing" and other customers that, pursuant to Sub-section 8-104 (m), should be excluded from the provisions of Sub-sections 8-104 (a) through (k). To comply with this data request, please fill in the blank cells of each of the following six tables. For purposes of this data request, please provide just one set of tables for all of Ameren – that is, using numbers aggregated across all three utilities (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).

RESPONSE

Prepared By: Ryan Schonhoff
Title: Regulatory Consultant
Phone Number: 314 554 4190

As used in the following tables:

- **"Small Customer" means "Residential customer" or "Small commercial customer" as defined in 220 ILCS 5/19-110, regardless of who sells the gas commodity.**
- **"Large Customer" means any other retail customer, other than a "Residential customer" or a "Small commercial customer" as defined in 220 ILCS 5/19-110, regardless of who sells the gas commodity.**
- **"Utility (PGA)" means a "Gas utility" as defined in 220 ILCS 5/19-110, in its capacity as a merchant of gas commodity rather than as a transporter of gas.**
- **"AGS" means "Alternative gas supplier" as defined in 220 ILCS 5/19-110.**
- **"Certified AGS" means any AGS that is certified to sell gas commodity to Small Customers, as described in 220 ILCS 5/19-110, regardless of who buys the gas.**
- **"Uncertified AGS" means any AGS that is not certified to sell gas commodity to Small Customers, as described in 220 ILCS 5/19-110.**

- **"N/A" means "not applicable" and is used here because only utilities and Certified AGS may sell gas to Small Customers.**

Natural Gas Deliveries (Therms) During Calendar Year 2009 Excluding Therms of sub-section 8-104 (m) customers		
associated with …	**and delivered to**	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	603,628,962*	290,568,151
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	281,706,724

Estimated Natural Gas Deliveries (Therms) During the 36 Months Ending May 31, 2014 Excluding Therms of sub-section 8-104 (m) customers		
associated with …	**and delivered to**	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	1,698,170,217*	812,991,012
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	1,149,757,425

Utility Revenues ($) During Calendar Year 2009 Excluding revenues from sub-section 8-104 (m) customers		
associated with …	**and delivered to**	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	$686,244,814*	$292,583,602
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	$27,209,116

Estimated Utility Revenues ($) During the 36 Months Ending May 31, 2014 Excluding revenues from sub-section 8-104 (m) customers		
associated with …	**and delivered to**	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	$1,944,497,843*	$845,961,700
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	$90,036,646

Alternative Gas Supplier Estimated Revenues ($) During Calendar Year 2009 Excluding revenues from sub-section 8-104 (m) customers		
associated with …	and delivered to	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	**N/A**	**N/A**
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	$114,525,231

Alternative Gas Supplier Estimated Revenues ($) During the 36 Months Ending May 31, 2014 Excluding revenues from sub-section 8-104 (m) customers		
associated with …	and delivered to	
Gas purchased from	***Small Customers***	***Large Customers***
Utility (PGA)	**N/A**	**N/A**
Certified AGS	**N/A****	**N/A****
Uncertified AGS	**N/A**	$718,749,480

***Contains data only for Residential therms & revenues. The Ameren Illinois billing system does not track "Small Customer" as defined in 220 ILCS 5/19-110. This group of customers would consist of GDS-1 – Residential Gas Delivery Service and a small subgroup of GDS-2 – Small General Gas Delivery Service.**
****Ameren Illinois does not offer a small volume transportation service to customers. All Rider T – Gas Transportation Service therms provided and revenues collected have been categorized as "Uncertified AGS"**