

REBUTTAL TESTIMONY

of

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Policy Group

Energy Division

Illinois Commerce Commission

Ameren Illinois Company d/b/a Ameren Illinois
Proposed General Increase in Electric and Natural Gas rates

Dockets Nos. 11-0279 and 11-0282 (Cons.)

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1 **I. Witness Qualifications**

2 **Q. State your name and business address.**

3 A. My name is David Sackett and my business address is 527 East Capitol Avenue,
4 Springfield, Illinois 62701.

5
6 **Q. Are you the same David Sackett who previously testified in this proceeding?**

7 A. Yes.

8
9 **II. Purpose of Testimony and Background Information**

10 **Q. What is the subject matter of your rebuttal testimony?**

11 A. Ameren Illinois Company (“AIC,” “Ameren,” or “Company”) proposed changes to
12 AIC’s gas transportation services. These changes are set forth in Rider T,
13 Transportation Service, and Rider Transportation Banking Service (“Rider TBS”),
14 which are discussed in the direct and rebuttal testimony of Mr. Eggers, Ameren
15 Exhibits 14.0G and 34.0. I respond to these changes to the Ameren’s gas
16 transportation services. Additionally, I respond to intervenor testimony provided
17 by Mr. Gorman representing the Illinois Industrial Energy Consumers (“IIEC”).

18
19 **Q. Do you have any attachments to your testimony?**

20 A. Yes. I have attached the following to my testimony:

21 Attachment A – Ameren’s response to Staff Data Request (“DR”) DAS 4.01

22

23 **III. Summary of Conclusions and Recommendations**

24 **Q. Please summarize your conclusions and recommendations.**

25 A. I have nine specific recommendations for the Commission to implement in this
26 docket, as follows:

27 1. Approve Ameren's proposed Rider TBS, with the following modifications:

- 28 a. Set Critical Day withdrawal rights for all transportation customers
29 based on their subscribed storage capacity.
- 30 b. Set the Banking Service Limit at 8.22 Bcf.
- 31 c. Reject the proposed Cashouts in Rider TBS that uses the higher of
32 Purchased Gas Adjustment ("PGA") and an index for under-deliveries
33 and the lower of PGA and an index for over-deliveries.
- 34 d. Implement a fall injection target like that used by Nicor Gas, Peoples
35 Gas and North Shore Gas.
- 36 e. Reject Ameren's proposed method for recovering 50% of storage
37 costs through a Deliverability Charge and 50% through a Capacity
38 Charge in Rider TBS.
- 39 f. Set a single rate to recover on-system storage costs based on Critical
40 Day withdrawal rights that is linked to storage capacity.
- 41 g. If the Commission accepts Ameren's proposal for a two-part storage
42 charge, reject the proposal to determine the deliverability component
43 of storage cost allocation using Maximum Daily Control Quantity
44 ("MDCQ") rather than historical Daily Confirmed Nominations ("DCN")
45 for GDS-4 customers.

46 h. Reject the proposal to determine interim base rates for transportation
47 customers that go into effect before Rider TBS becomes effective, by
48 allocating storage costs on factors besides historical DCNs for all
49 transportation customers.

50
51 2. Reject the Cashouts as proposed in Rider T that use the higher of
52 PGA and an index for under-deliveries and the lower of PGA and an
53 index for over-deliveries.

54

55 **IV. Changes to Transportation Service**

56 **A. The Nicor Method**

57 **Q. What is the basic view of transportation customers under the Nicor**
58 **Method?**

59 A. The Nicor method is based upon the view that transportation customers are as
60 important as sales customers and, as such, are afforded the same rights to
61 storage capacity and storage deliverability on a peak day. This is evident from
62 the approach taken to determine peak day parameters, seasonal parameters,
63 and storage cost allocation, all by using relative peak day for each calculation.
64 Ameren opposes this approach and also seeks to deprive transportation
65 customers of access to storage altogether. The Commission has historically
66 approved transportation programs that take the basic approach that

67 transportation customers are afforded the same rights to storage capacity and
68 storage deliverability on a peak day as sales customers.¹

69

70 **Q. Did you recommend applying the Nicor Method to Ameren’s system?**

71 A. Yes. I recommended that the Commission require Ameren to provide its
72 transportation customers with proportional rights to its on-system storage both
73 seasonally and on a peak day. (Staff Ex. 13.0, pp. 19-21)

74

75 **Q. How did Ameren respond to your recommendation?**

76 A. Mr. Eggers responded that I did not establish that Ameren’s system is
77 operationally comparable to that of Nicor Gas, describing my approach as a
78 “one-size-fits-all” method. (Ameren Ex. 34.0, p. 2)

79

80 **Q. Do you agree with Mr. Eggers characterization of the Nicor Method you
81 proposed as “one-size-fits-all?”**

82 A. No. The Nicor method applied to Ameren’s system is Ameren-specific. If it were
83 “one-size-fits-all,” Ameren customers would be given 31 days of bank as Nicor
84 customers have. On the other hand, Ameren gives its transportation customers a

¹ See Final Orders in Dockets, 04-0779, p. 138 and 08-0363, p. 115. It is also similar to the type of charge proposed by Peoples Gas and North Shore in their current rate case. Peoples Gas and North Shore Gas have used a similar method to allocate capacity for years; they include both on and off-system assets in their calculations but the process is essentially the same. In their current rate cases, Docket Nos. 11-0280 and 11-0281 (Cons.), Peoples Gas and North Shore Gas have proposed to allocate storage costs and peak day deliverability in essentially the same manner as the Nicor Method. (See Docket Nos. 11-0280 and 11-0281 (Cons.), PGL Ex. 12.0, pp. 32-44; NS Ex. 12.0, pp. 29-41)

85 one-size-fits-all 10 day bank across *all three rate zones*. For example, customers
86 in Rate Zone 3, which historically has the most storage allocated to it, could elect
87 zero bank while all the customers in Rate Zone 1 with the least storage could elect
88 22 days even though that rate zone cannot support that level of bank. Ameren's
89 base proposal, which has a uniform average bank level for all three rate zones,
90 suggests that its system is *more* robust than it would have one believe. Rather, the
91 Nicor Method allocates storage rights based on the assets in Ameren's own
92 portfolio. The maximum storage capacity is Ameren's, not Nicor's, and the peak
93 day withdrawal from storage is again Ameren's, not Nicor's.

94

95 **Q. Has Ameren made this argument before?**

96 A. Yes. Ameren made the same objections when it advocated that transportation
97 customers receive *no banks* in 2007. (Docket Nos. 07-0585 et al. (Cons.), Ameren
98 Ex. 30.0, pp. 24-26) Now it uses this same argument in its defense of the *status*
99 *quo*: that is, limited, less than proportional banks.

100

101 **Q. Does the gas brought into the system by transportation customers get
102 injected into Ameren's on-system assets?**

103 A. No. Mr. Eggers states that Ameren currently fills on-system storage with Sales
104 customers' gas and puts transportation customers' gas in banks elsewhere within
105 the system. He explains that, "[o]ur current storage resources permit this, as we
106 physically fill on-system storage with sales customer gas and provide transportation
107 customers the option to bank as they see fit within the 10 day 5.482 Bcf of BSL."

108 (Ameren Ex. 34.0, p. 17) Mr. Egger's statement does not incorporate a gas
109 operational principle known as displacement.

110

111 **Q. What is displacement?**

112 A. The American Gas Association ("AGA") defines displacement as, "Displacement
113 transactions permit the lateral movement of gas through a transportation network.
114 The configuration of many pipelines is such that it may not be apparent whether a
115 given movement of gas is forward or backward from the point of receipt. It can be
116 argued that all transportation service is performed by displacement as the physical
117 delivery of the same molecules of gas is impossible." ²

118

119 **Q. How does displacement affect the balancing issue?**

120 A. Several of Ameren's arguments ignore the concept of displacement. Specifically,
121 Mr. Eggers argues that "[d]evoting 47% of the working capacity of a storage field to
122 a customer group that may choose not to withdraw during the winter season
123 therefore presents significant operational difficulties." (Ameren Ex. 34.0, p. 18)
124 First, I note that the correct number is 32%, as explained below. Second, Mr.
125 Eggers' statement implies that transportation customers control those assets.
126 However, his statement that capacity can be "devoted" to transportation customers
127 directly contradicts an earlier statement that sales gas goes into those fields.

² <http://www.aga.org/Kc/glossary/Pages/D.aspx>, accessed on August 17, 2011.

128 (Ameren Ex. 34.0, p. 17) The fact is that the gas going into those assets is a
129 mixture of sales and transportation gas, and that given a reasonable injection
130 target, those fields will not be harmed in any way by the transportation customers'
131 actions.

132

133 **Q. How else does displacement affect the application of the Nicor Method to**
134 **Ameren?**

135 A. The other argument that Mr. Eggers advances is that the amount of storage as a
136 percentage of on-system assets is really not the issue because Ameren puts
137 transportation customers' gas into its system and it goes into a variety of both on-
138 and off-system storage assets. While the Nicor method allocates a proportional
139 amount of those on-system assets to transportation customers, from an operational
140 point of view, that percentage is not significant. It is a relatively small percentage
141 when you consider that Ameren uses its entire system to support both peak day
142 deliveries and maximum storage capacity. Therefore, the more relevant
143 comparison is the percentage of the total system assets which are used by
144 transportation customers. Thus the percentage of gas in all assets that is not in
145 Ameren' direct control is less than Mr. Eggers indicates.

146

147 **Q. How do the percentages change when other assets are considered?**

148 A. They look very different. The Nicor Method applied to Ameren's on-system peak
149 day assets results in transportation customers being allocated 32% of Ameren's on-
150 system peak day deliverability. But this is only 22% of the *total* system, including

151 off-system, assets' peak day deliverability. Similarly, the Nicor Method applied to
152 Ameren's on-system assets' maximum storage capacity results in an allocation to
153 transportation customers of 32% of Ameren's *on*-system capacity. But this is less
154 than 20% of the *total* system maximum storage capacity.

155

156 **Q. Did Mr. Eggers point out an inconsistency between the Nicor method**
157 **described in your direct testimony and the actual numbers used by you**
158 **and Mr. Eggers?**

159 A. Yes. Mr. Eggers said,

160 Mr. Sackett introduced the Nicor method in Ameren Illinois' last rate case,
161 Docket 09-0306 (Cons), in his rebuttal testimony. His calculation determined
162 the proportion using the Peak Design Day of Ameren Illinois' sales
163 customers. While reviewing the impact of Mr. Sackett's proposal in the case,
164 I became aware that the Nicor method, as adopted in the Order in Nicor's
165 rate case Docket 08-0363, uses the total system peak day which is the sum
166 of the MDCQs of the transportation customers and the peak day demand of
167 the sales customers.

168 (Ameren Ex. 34.0, p. 16)

169

170 **Q. Is his correction accurate?**

171 A. No, not precisely. Ameren does not use a Peak Day in its planning equivalent to
172 Nicor's peak day demand. Nicor uses an integrated peak day demand which
173 reflects the usage of all customers. Ameren uses a Design Peak Day that
174 estimates sales customers' use and adds expected bank usage by transportation
175 customers. Not recognizing this difference, I used Ameren's peak day "Total
176 Requirements" in my direct testimony in Ameren's 2009 rate case. Additionally,
177 there was an error in my direct testimony where I used only the sales peak day

178 instead of “total requirements” for one of the three utilities.³ (Docket Nos. 09-0306
179 et al. (Cons.), Staff Ex. 14.0, pp. 23-24) When Ameren presented its proposal in
180 the here, it mistakenly used the peak day for sales customers only. (Ameren Ex.
181 14.3) In my direct testimony in this case, I presented the Nicor Method correctly as
182 dividing the annual storage capacity by the *system* peak day demand (the total
183 usage of sales and transportation customers). (Staff Ex. 13.0, pp. 9-10) However, I
184 did not correct Ameren’s mistake and used only sales customers’ peak day
185 demand in my own calculations.

186

187 **Q. Is this clarification necessary?**

188 A. Yes. The correction made by Mr. Eggers is accurate and essential to applying
189 Nicor’s method to Ameren’s system so that proportional banks are provided. It has
190 never been my intention to force Ameren to provide banks that are greater than
191 proportional. The different calculations result in 15 days of bank for all
192 transportation customers and the initially unsubscribed transportation capacity is
193 made available for other transportation desiring additional capacity. The result of
194 making these corrections is the revised Banking Service Limit (“BSL”) of 8.2 Bcf as
195 calculated in Ameren Ex. 34.2.

196

³ This error would not have changed the number of days calculate because it would have rounded to the same 24 days. However, this may be where some the confusion originated.

197 **B. Recommended changes to Rider TBS**

198 **1. Give transportation customers Critical Day withdrawal rights**
199 **that are linked to the maximum storage capacity.**

200 **Q. What did you recommend in your direct testimony regarding Critical Day**
201 **withdrawal rights?**

202 A. I recommended that the Commission require Ameren to provide its transportation
203 customers with proportional rights to its on-system storage on a Critical Day
204 (“CD”). (Staff Ex. 13.0, pp. 15-19)

205

206 **Q. How did Ameren respond to your recommendation?**

207 A. Mr. Eggers responded by claiming that such an expansion of rights would force
208 Ameren to purchase additional storage capacity. He also objected that my
209 proposal grants transportation customers more deliverability from storage on a
210 CD than on a non-critical day. (Ameren Ex. 34.0, p. 9-11)

211

212 **Q. Do you agree that Ameren would have to get additional peak day resources**
213 **if the Commission ordered them to offer proportional rights on the peak**
214 **day?**

215 A. That is not known. Ameren would need to re-evaluate its peak day portfolio. Given
216 that Ameren does not believe that customers will take the full 10 days of bank, it
217 appears unlikely that Ameren will need to acquire more assets. In addition, the
218 number of transportation customers has increased significantly since the last rate

219 case. It does not appear that Ameren has needed to significantly increase its peak
220 day assets in response.

221

222 **Q. In the unlikely event that Ameren must acquire additional peak day**
223 **resources, is there a subsidy from sales to transportation customers as**
224 **Ameren indicates?**

225 A. No. Currently, Ameren's tariffs provide sales customers with a disproportionate
226 peak day access to its storage assets. Correcting this distortion allows
227 transportation customers their fair share of those assets while requiring them to pay
228 proportionally for them. Ameren can get more peak day resources if it needs them.
229 Ameren has proposed in its direct testimony to eliminate one off-system storage
230 asset from its portfolio. Of course, if Ameren did require more assets, sales
231 customers would pay *less* than they currently do for on-system storage and *more*
232 for off-system assets. The net effect of this is not known.

233

234 **Q. What is the peak day deliverability from the storage system?**

235 A. In my direct testimony, I calculated that for Ameren as a whole it is 558,759 Dth
236 (Ameren F-8, b)5 and b)6), or 48.1% of its peak day demand of 1,184,392 Dth
237 (Ameren Ex. 14.3), which can be met from its on-system storage. This result
238 should have been 47.2% as corrected in my direct testimony workpapers.
239 However, given the note above about the system peak demand, I should have used

240 the number 1,732,572 as the correct system peak demand; thus, the actual result
241 should 32%.(See above Section IV. A., page 6)

242

243 **Q. Have the Critical Day withdrawal rights under the Nicor Method been affected**
244 **by this change?**

245 A. No. Using the Nicor Method, Ameren's peak day deliverability of total on-system
246 storage of 558,759 Dth should be divided by its on-system storage capacity of
247 25,765,200 Dth. CD withdrawal rights should be 2.2% of the transportation
248 customer's Bank Limit as previously calculated.

249

250 **Q. Is it reasonable to allow transportation customers to withdraw more gas on a**
251 **peak day than on a non-peak day?**

252 A. Yes. It is reasonable because Ameren's current non-peak day restrictions are less
253 than proportional compared to sales customers. Thus, my proposal is an interim
254 step toward increasing both CD and non-CD flexibility.

255

256 **Q. What do you recommend for Critical Day withdrawal rights in Rider TBS?**

257 A. I continue to recommend that the Commission order Ameren to establish
258 withdrawal rights at 2.2% of the transportation customer's Bank Limit for all
259 transportation customers.

260

261 **2. Give transportation customers proportional maximum storage**
262 **capacity based on the Nicor Method.**

263 **Q. What did you recommend in your direct testimony regarding Ameren’s**
264 **proposed Banking Service Limit (“BSL”)?**

265 A. I recommended that the Commission require Ameren to provide its transportation
266 customers with proportional rights to its on-system storage. While Ameren had
267 proposed a BSL of 5.2 Bcf, I recommended that there be no BSL but that
268 transportation customers as a group be allocated storage capacity proportional to
269 sales customers. (Staff Ex. 13.0, p. 19-21)

270

271 **Q. Did any intervenor support proportional maximum storage capacity?**

272 A. Yes. Mr. Gorman also supported this proportional maximum storage capacity for
273 transportation customers. (IIEC Ex. 4.0, p. 7)

274

275 **Q. How did Ameren respond to your recommendation?**

276 A. Mr. Eggers responded by claiming that the proportion has no meaning because
277 the two numbers do not have a proportional relationship. (Ameren Ex. 34.0, p. 5)

278

279 **Q. How does the correction to the transportation customers’ total storage**
280 **capacity rights affect Ameren’s objections?**

281 A. Most of Ameren’s objections to the bank expansion were based on its opposition to
282 22 days of bank. In spite of the correction to the calculation of transportation
283 customer storage allocation to 15 days, Ameren’s continued protest that “[t]he

284 access granted to the transportation customers remain untenable for the same
285 reasons as stated above” is ameliorated. (Ameren Ex. 34.0, p. 17)

286

287 **Q. Mr. Eggers objects to relative peak day as an allocator. How do you**
288 **respond?**

289 A. Mr. Eggers claims that I have not demonstrated that this allocator is appropriate,
290 because it is not operationally linked to that maximum storage capacity.

291 Furthermore, he suggests other divisors might be more appropriate. He suggests
292 that other possible divisors would be “actual usage on a peak day divided by total
293 storage capacity,” “the ratio of winter transportation customer throughput over total
294 winter throughput,” and “maximum coincident banked volumes of transportation
295 customers in the winter(s) prior to the proceeding to gauge what they are actually
296 using.” (Ameren Ex. 34.0, p. 6) However, these other divisors are not operationally
297 linked, which supports the conclusion that there is no need to “operationally link” the
298 numerator with the divisor. It is instructive that Peoples Gas and North Shore have
299 both proposed to now use the same peak day allocator (peak day demand) in their
300 current rate case (Docket Nos. 11-0281/0282 consolidated)(Cons.) and that no
301 one has opposed this allocator in that proceeding.

302 Like Nicor, Peoples Gas allocates access on a DPD basis.
303 Specifically, the allocation is done on a customer or pool Maximum
304 Daily Quantity (“MDQ”) relative to Peoples Gas’ DPD sendout. This is
305 accomplished by calculating the storage capacity on a peak day
306 basis (i.e., by dividing the total capacity of storage by Peoples Gas’
307 DPD), which is defined as Days of Storage. Peoples Gas then
308 allocates that full complement of storage days to each customer.
309 (Docket Nos. 11-0281/0282 consolidated, Peoples Gas Ex. 14.0, p.
310 16, North Shore Ex. 14.0, p. 15-16)

311 In fact, Peoples Gas, North Shore, and Nicor have not indicated the need for an
312 “operational link” for their allocator and have been able to operate their systems
313 competently without this “link”.

314

315 **Q. If the Commission orders that Ameren’s storage should be allocated**
316 **proportionally, what should be used to divide the capacity?**

317 A. Using relative peak day demand makes sense for several reasons. First, it is
318 reasonable in this case because it is the only Commission-approved method for
319 capacity allocation.⁴ Second, Ameren uses relative peak day demand to allocate
320 banks to individual transportation customers (as in days of bank times MDCQ).
321 Since Ameren itself has used this method for allocating banks amongst
322 transportation customers for decades, it is only logical to use this divisor to allocate
323 proportional annual capacity.

324

325 **Q. Is the Company recommending that the Bank Storage Limit remain**
326 **constant?**

327 A. Yes. Mr. Eggers has corrected an error in his direct testimony that clears up this
328 discrepancy; his rebuttal states that the BSL will be fixed. (Ameren Ex. 34.0, p. 30)

329

330 **Q. Do you agree with Ameren’s proposed limit on transportation customers’**

⁴ The Commission has approved the use of peak day supply with a diversity factor which approximates the relative peak day demand for Peoples Gas and North Shore.

331 **storage capacity?**

332 A. No. I now propose that the BSL be set at 8.22 Bcf, which is equivalent to the 15
333 days of bank.

334

335 **Q. Do you support cycling requirements?**

336 A. Yes, I support a single fall injection target, like the one used by Nicor, as
337 appropriate for Ameren's transportation customers. This should be set at the
338 average maximum level that Ameren has filled its on-system storage for the past
339 five years.

340

341 **Q. Does Ameren support your recommended cycling requirements?**

342 A. No. Mr. Eggers does not support the cycling requirements because he insists that
343 Ameren's service is a balancing service, not a storage service. Additionally,
344 according to Mr. Eggers, transportation customers do not want a fall cycling target.

345

346 **Q. How do you respond to this?**

347 A. While it is no surprise that transportation customers do not desire a fall injection
348 target, it is surprising that Ameren does not see the purpose for such a
349 requirement. The physical cycling of each field should not be confused with the
350 cycling of the gas within the banks of transportation customers. Because of
351 displacement, all gas can be cycled from the fields even if transportation customers
352 do not withdraw it from their banks. No other major utility has shown that spring
353 cycling is problematic. One option is to implement it in this docket, and if it proves

354 to be a problem, Ameren has the option of filing a 45-day filing or correcting it in the
355 next rate case.

356

357 **Q. Is the Nicor Method compatible with non-proportional total storage capacity**
358 **rights?**

359 A. Yes. Even if the total storage capacity of individual customers or transportation
360 customers as a group, as in the case of Ameren's proposed BSL, is limited by the
361 Commission to 5.2 Bcf, the storage cost and peak day rights determined under the
362 Nicor Method are still relevant. The rest of the Nicor Method is still appropriate with
363 that lower BSL in place.

364

365 **3. Charge transportation customers for storage costs based on the**
366 **proportional Critical Day rights and maximum storage capacity.**

367

368 **Q. What did you recommend in your direct testimony regarding Ameren's**
369 **proposed two-part storage charges?**

370 A. I recommended that the Commission reject these charges because they
371 inappropriately allocated costs to the first day of bank and instead should
372 implement a single peak-day charge that is also equally linked to storage
373 capacity as has been approved by all other major Illinois gas utilities.
374 Additionally, I proposed that any charge for peak day be based on the tariff CD
375 rights of 20% of DCN instead of the 20% of MDCQ. (Staff Ex. 13.0, pp. 21-26)

376

377 **Q. Did any intervenor support a single proportional storage charge?**

378 A. Yes. Mr. Gorman also supported single proportional storage charge for
379 transportation customers. (IIEC Ex. 4.0, pp. 14-15)

380

381 **Q. How did Ameren respond to your recommendation for a single charge?**

382 A. Mr. Eggers responded that, “Mr. Sackett’s proposal appears to provide Ameren
383 Illinois with full cost recovery of on-system storage costs allocated to
384 transportation customers.” (Ameren Ex. 34.0, pp. 18-19) However he then stated
385 that by “ignoring the deliverability attribute of Ameren Illinois’ banking service, Mr.
386 Sackett’s proposal fails to appropriately value the balancing service afforded by a
387 customer selecting a single day of bank.” (Ameren Ex. 34.0, p. 19)

388

389 **Q. How do you respond to Mr. Egger’s objections about the appropriateness
390 of using a single charge?**

391 A. Currently, Ameren uses a single charge that is based on one component
392 (deliverability), since the other component (annual capacity) is fixed. Now Ameren
393 proposes to use two charges instead of linking the two components and sticking
394 with a single charge as is done by all of the other major gas utilities in this state.
395 This charge has been used by Nicor Gas for more than a decade and has been
396 proposed by Peoples Gas and North Shore in their present rate case. Ameren
397 sees this as a charge per therm of maximum storage capacity. However, this
398 single charge is equally a charge per therm of CD deliverability. The key difference
399 is that with the Nicor Method, peak deliverability is mathematically linked to the

400 annual capacity. My proposal recognizes the linkage between seasonal capacity
401 and the ability to deliver a volume of gas on the peak day.

402

403 **Q. Has Ameren changed its rationale for the two-part charge?**

404 A. Yes. In its direct testimony, Ameren's reason for the peak day component was
405 peak day deliverability. (Ameren Ex. 14.0, pp. 8-9) Now, in rebuttal testimony, it is
406 balancing. (Ameren Ex. 34.0, pp. 20-22) Storage costs for transportation
407 customers should be for capacity and peak day deliverability, not daily-balancing.
408 Ameren, by its own admission, balances its system and the imbalances of
409 transportation customers through various gas supply decisions (Ameren Ex. 34.0,
410 pp. 26-27), the effects of which flow through the PGA. Ameren does not incur costs
411 for balancing that it should be recovering for through base rates. Rather, if there
412 were any costs for the balancing function, which Ameren has not established, these
413 would be reflected in the PGA and would be offset through transportation
414 customers' cashouts and associated premiums and other penalties which are
415 appropriately credited to the PGA and not to Ameren.

416

417 **Q. How did Ameren respond to your recommendation to the use of the tariffed**
418 **DCN instead of MDCQ?**

419 A. Mr. Eggers objected to the use. Mr. Eggers provides the following statement
420 contradictory.

421 Ameren Illinois' proposed allocation, however, is designed to allocate
422 on system storage costs to transportation customers *based on their*

423 *daily rights to withdraw from their bank balances on a Critical Day.*
424 Today those rights are 20% of DCN for daily-balanced transportation
425 customers and 50% of MDCQ for monthly balanced transportation
426 customers.
427 (Ameren Ex. 34.0, p. 24, emphasis added)

428 Mr. Eggers states that Ameren bases its proposal on the customers' rights
429 (which he acknowledges are 20% of DCN for daily-balanced customers)
430 which is what Staff has proposed be used. Ameren's own proposal, which is
431 based on 20% of MDCQ, is higher than the tariff right that he has just cited.

432 So he rebuts my proposal to use 20% of DCN by quoting the tariff which
433 confirms that my proposal and not his is the correct tariffed right.

434

435 **Q. How do you respond to Mr. Egger's objections to the use of the tariffed**
436 **DCN instead of MDCQ?**

437 A. Ameren has sought for two consecutive rate cases to charge daily-balanced
438 transportation customers for more than their tariffed peak day withdrawal rights on
439 a CD. If Ameren really wants to charge storage costs based on MDCQ, then it
440 should rewrite its tariff to allow its daily-balanced customers to withdraw up to 20%
441 of MDCQ. Instead, Ameren wants to allocate costs based on MDCQ but to allocate
442 Critical Day withdrawal *rights* based on DCN. Ameren's greater-than-tariff proposal
443 has been previously rejected. The Company has provided no more convincing
444 argument in this case and the Commission should reject their proposal a second
445 consecutive time.

446

447 **Q. How did Ameren respond to your recommendation for a single charge**
448 **based on a linked peak day and annual capacity amounts?**

449 A. Mr. Eggers follows up his contradictory statement above about charging customers
450 for their tariffed rights which were 20% of DCN followed by the note that Ameren
451 had elected to use something different (Ameren Ex. 34.0, p. 24), with an irrelevant
452 point. Mr. Eggers claims that a transportation customer's peak day nomination is
453 essentially equal to the customer's MCDQ.

454 However, a customers' DCN can be the same as their MDCQ, in
455 other words, the customer has the right to nominate up to their
456 MDCQ on any given day at their sole election. So *a customers' right*
457 *to withdraw from their bank on a Critical Day is essentially up to 20%*
458 *of their MDCQ* and many customers have nominated up to and even
459 nominated above their stated MDCQ levels.
460 (*Id.*, emphasis added)

461 Mr. Eggers then claims to have proof that DCNs can be higher than MDCQs on any
462 given day. He supports this with Table 4 that pulls 9 *selected* customers on
463 *selected* non-peak days and shows that their DCNs were higher than their MDCQ
464 on those days. He has not shown that transportation customers as a group have
465 done this, or more importantly that they have done this on a peak day. No
466 inferences should be drawn from the table.

467

468 **Q. Is there evidence comparing MDCQs and DCNs on historical peak days?**

469 A. Yes. Ameren has provided the data from its historical peak days for the past 5
470 years. (Attachment A – Ameren response to Staff DR DAS 4.01 Atts. 01 and 02)
471 These attachments show that the average DCN for each historical peak is less than
472 43% for the only two years for which Ameren has MDCQ data and which occurred

473 pursuant to the Commission's 2009 decision to use historical peak DCN as the
474 appropriate storage cost allocator because DCN is what Ameren's own tariff allows.
475 This evidence confirms that on noncritical historic peak days, transportation
476 customers as a group have been nominating less than their MDCQs and, thus, any
477 attempt to allocate costs to them based on bank withdrawals will over allocate
478 storage costs to them.

479

480 **Q. How do historic peak day withdrawals likely relate to actual CD withdrawals?**

481 A. When consideration is given to the "big picture" of \$6-per-therm tariff penalties, it is
482 certain that transportation customers will have *smaller* bank withdrawals on a CD
483 than they have on historic peak days that do not reflect these steep penalties.

484

485 **Q. What do you recommend if the Commission does not approve the linking**
486 **of CD withdrawal rights to the maximum storage capacity?**

487 A. If the Commission rejects my proposal to link CD withdrawal rights, annual capacity
488 and storage costs to the peak day through the MDCQ, then in lieu of such a tariff
489 change, I recommend that the Commission allocate those costs based on 20% of
490 the average historical peak DCN during the past two years – i.e. 43% of their
491 MDCQ. It would be appropriate to use this amount for the interim period for all
492 transportation customers and, after Rider TBS is in effect, for daily-balanced
493 customers.

494

495 **Q. What is Ameren Exhibit 34.1 and what does it purport to show?**

496 A. Mr. Eggers introduces Ameren Exhibit 34.1, which is a table of monthly charges for
497 transportation customers under the various proposals, and claims that it shows that
498 Ameren's fee structure does not impact the various daily and monthly balanced
499 customers as I suggest.

500

501 **Q. What does Ameren Exhibit 34.1 actually show?**

502 A. Ameren Ex. 34.1 confirms that Ameren's method allocates at least 50% of the costs
503 to the first day of bank. Savings from being on transportation service depends on
504 an individual customer's characteristics and circumstances. This exhibit, therefore,
505 supports my contention that, all other things being equal, if the amount of the
506 additional storage cost allocated to the peak day component exceeds a monthly-
507 balanced customer's benefit from transportation service, then that customer will
508 exercise the option to return to sales service.

509

510 **Q. How will Ameren's proposal for storage cost recovery affect *daily*-balanced**
511 **customers?**

512 A. Ameren's method allocates a significant portion of costs to the first day of bank. In
513 my direct testimony, I stated that "this is likely to drive at least some GDS-4
514 customers, who have the option, to select no bank in order to avoid the high initial
515 bank charges. As a practical matter, such a selection might end up depriving large
516 transportation customers of their access to any bank." (Staff Ex. 13.0, p. 22)

517 Ameren objected that I had performed no study to support this. (Ameren Ex. 34.0,

518 p. 23) I performed no such study because I felt that my statement was a
519 reasonable conclusion based on the evidence provided. Additionally, Ameren has
520 already stated that it does not expect electric generators to purchase banks at all
521 because they seldom use the ones they currently have. (Ameren Ex. 14.0, p. 13)
522 For customers such as these, the cost of that initial day of bank will likely be
523 prohibitive. Finally, Ameren states that currently daily-balanced customers fill only
524 30% of their bank capacity. (Ameren Ex. 14.0, p. 15)

525

526 **Q. How will Ameren’s proposal for storage cost recovery affect monthly-**
527 **balanced customers?**

528 A. As I discussed previously, when combined with Ameren’s proposal to require
529 monthly-balanced customers to subscribe to at least 5 days of bank, some smaller
530 customers may be driven back to sales service purely because transportation
531 service is no longer economical.

532

533 **Q. In your direct testimony you stated that the “rights of *daily*-balanced**
534 **customers would need to be reduced. (Staff Ex. 13.0, p. 24) Was that**
535 **statement correct?**

536 A. No. That statement should have referred to *monthly*-balanced customers. The
537 reduction is necessary to keep these customers from being arbitrarily priced out of
538 the market.

539

540 **Q. How do you respond to Mr. Egger’s objections regarding the extra costs**

541 **incurred to balance monthly-balanced customers?**

542 A. While Ameren claims that it incurs higher costs in balancing monthly-balanced
543 customers, it has not shown that this is the case. Storage costs should reflect the
544 *cost of services* and not the extra benefit received. These monthly-balanced
545 customers are smaller and less likely to place a strain on the system; their usage
546 fluctuations are the same as when they were sales customers and Ameren
547 internalized the fluctuations when they were sales customers. These imbalances
548 should be viewed in much the same manner.

549

550 **Q. Is it worthwhile to provide valuable services to Ameren's monthly-balanced**
551 **transportation customers?**

552 A. Yes. The Commission ordered Ameren to institute a system-wide monthly-
553 balanced transportation service directed at smaller volume transportation
554 customers. Since that time, transportation service to GDS-2 and GDS-3 customers
555 has grown significantly from about 1100 to about 2100 currently. (Ameren
556 Response to Staff DR PL 3.02) This growth reflects the appeal of this monthly-
557 balanced program and its tariff parameters. The significant increase in the storage
558 costs allocated to monthly-balanced customers may arbitrarily make transportation
559 service uneconomical for smaller customers.

560

561 **Q. Is a five day minimum bank appropriate for monthly-balanced customers?**

562 A. Yes. I believe that there should be some minimum, and I agree with Mr. Eggers
563 that these customers benefit from storage regardless of bank size. My only

564 concern is the basis for that minimum being five days. However, considering that
565 the average maximum amount of storage used by monthly-balanced customers is
566 60% (or six days), the amount appears to be reasonable. Additionally, no
567 intervenors objected to that level. Therefore, I support the five day minimum
568 proposed by Ameren. This issue should be re-evaluated in the next rate case once
569 we have data on how those customers are using their new banks.

570

571 **Q. What did you propose for storage cost recovery in your direct testimony?**

572 A. I proposed that the two components of the Ameren charge be replaced with a
573 single component calculated in the manner described above (See Section IV., A)
574 as the Nicor Method. I continue to support the same charge.

575

576 **Q. What would be the single charge applied to Rider TBS customers?**

577 A. My calculation of this charge is determined by dividing the on-system storage costs
578 of \$32,485,580 by the annual capacity of on-system storage of 25,765,200 Dth.
579 This results in an annual per Dth of Bank Limit charge of \$1.26, an annual per
580 therm of Bank Limit charge of \$0.126 and a monthly charge of \$0.0105 per therm of
581 Bank Limit.⁵ Doubling the proposed capacity charge and linking the Critical Day
582 withdrawal right eliminates the need for a separate capacity-based portion of that
583 charge.

⁵ The charge I have calculated is exactly double the proposed capacity charge if I understand the manner in which the charge is applied. Ameren's capacity charge is \$0.063 per month which is applied that charge to 1/12th of the Bank Limit. My method is more straightforward, but I believe that we have achieved the same result. (The equivalent charge in Rider TBS would then be \$0.126 per therm).

584

585 **Q. Did Ameren specify its proposal for the formation of rates for the three month**
586 **interim period before Rider TBS takes effect?**

587 A. No. As I noted in my direct testimony (Staff Ex. 13.0, p. 25), Ameren did not specify
588 its proposed rates for the interim period in its direct case. Nor was it mentioned in
589 Ameren's rebuttal testimony. Ameren acknowledged in discovery that had used the
590 equitable method for that interim period and to base costs on the full 10 days of
591 bank for the capacity portion and the 20% of MDCQ for the deliverability portion for
592 daily-balanced customers and the 50% of MDCQ for monthly-balanced customers.
593 (Ameren response to Staff DR DAS 3.05)

594

595 **Q. What are your concerns regarding the three month interim period before**
596 **Rider TBS would take effect?**

597 A. Interim base rates should be determined in the manner that the Commission
598 ordered in the previous rate case for those three months, i.e. allocate storage costs
599 to all transportation customers based on 20% of DCN. In addition to the reasons
600 stated above (See above Section IV. B., pages 18-22), I believe that this is also
601 appropriate for those three months until the new rider TBS goes into effect because
602 the tariff rights will not have changed and the Commission's currently effective
603 ruling is still appropriate. This ensures that there is no three month gap in which
604 costs spike before more reasonable rates discussed here are implemented.

605

606 **Q. Once Rider TBS takes effect, does this DCN versus MDCQ issue disappear?**

607 A. No. It is no longer a base rates issue, but becomes a concern in Rider TBS
608 charges, as mentioned above, because the storage costs will then be recovered
609 under Rider TBS and the charges proposed by Ameren still incorporate the charges
610 for withdrawal rights that are above those allowed in the tariff.

611

612 **4. Reject Ameren's changes to the Cashout provisions**

613 **Q. What did you recommend in your direct testimony regarding Ameren's**
614 **proposed changes to its cashout provisions from the market price to the**
615 **greater of PGA or the market price for gas bought from Ameren and the**
616 **lesser of the PGA or the market price for gas sold to Ameren?**

617 A. I recommended that the Commission reject these changes to Ameren's Rider T
618 cashouts and the imposition of the same provisions in Rider TBS because they
619 are not cost-based. I stated that the PGA is not the appropriate price to prevent
620 arbitrage. Ameren provided no evidence in direct testimony regarding the
621 "negative cost consequences" to PGA customers and that the cashout provisions
622 are already designed to deter transportation customer behavior that might impair
623 the system. Finally, I noted that there is no evidence that the current provisions,
624 which use the market price, are inadequate. (Staff Ex. 13.0, pp. 26-28)

625

626 **Q. How did Ameren respond to your recommendation?**

627 A. Mr. Eggers responded by arguing that the PGA is more appropriate because it is
628 the price paid by sales customers in that month for gas. He then provided
629 several exhibits that purportedly demonstrate the harm to sales customers from

630 his alleged arbitrage. He also argues that Ameren's current cashout provisions
631 encourage under-delivery. (Ameren Ex. 34.0, pp. 25-28)

632

633 **Q. Are Ameren's objections valid?**

634 A. No. Clearly sales customers would benefit from having transportation customers
635 pay more vis-à-vis what they are currently paying. However, that is not the goal
636 here. The goal should be to protect the PGA from costs actually incurred from
637 transportation customer imbalances. Using a market price better reflects what
638 Ameren pays to get additional supplies to cover the cost of imbalances and protect
639 the PGA customer. It thus protects the PGA from fluctuating because of
640 transportation customer imbalances. When transportation customers *as a group*
641 under-deliver, Ameren can purchase additional supplies at the market price. When
642 transportation customers *as a group* over-deliver, Ameren can reduce its planned
643 spot purchases by the amount of the over-delivery. In either case, the PGA is not
644 affected. Note, in both cases, any change in supply by Ameren is based on the *net*
645 under and over deliveries of all transportation customers. Sales customers, in fact,
646 may *benefit* from *individual* transportation customers being both above and below
647 the deadband selling them gas 10% above the market price and buying 10% below
648 the market price, when Ameren makes no market transactions at all because the
649 transportation customers as a group are in balance. While the premiums and
650 discount from market price are an incentive for the transportation customers to
651 nominate accurately, their mistakes inure to the benefit of sales customers.

652

653 **Q How does Mr. Eggers support his position that the PGA should be used?**

654 A. Mr. Eggers claims that Ameren cannot buy more gas after they notice that a
655 transportation customer had an imbalance because by the time the imbalances are
656 calculated, it is the next day. (Ameren Ex. 34.0, pp. 26-27)

657

658 **Q Are Ameren's purchases of gas during the gas day as restricted as Mr.**
659 **Eggers claims?**

660 A. No. Mr. Eggers does not answer the important question which is, "What price does
661 Ameren pay for changes in gas purchase needed to balance the system that result
662 from transportation customers' imbalances?" Due to diversity, Ameren does not go
663 around and balance each customer each day. Rather, Ameren balances the
664 system and much of the imbalances of one customer is countered by the opposite
665 imbalances of customers going the other way. The net result is what causes a
666 need to purchase gas. Those net purchases are realized during the gas day by a
667 drop in system pressure and Ameren responds by buying more gas – at the market
668 price, not the PGA. Even if Ameren were not able to purchase at the end of the day
669 these occurred, it could increase its purchases the next morning, which most likely
670 would have an opening price very close to the closing price from the day prior.

671

672 **Q. What does Ameren Exhibit 34.4 purport to show?**

673 A. Mr. Eggers claims that Ameren Exhibit 34.4 is "an example of negative cost
674 consequences for sales customers from 2009 and 2010." (Ameren Ex., 34.0, p. 26)

675

676 **Q. What does Ameren Exhibit 34.4 actually show?**

677 A. Ameren Exhibit 34.4 actually proves nothing regarding the negative cost
678 consequences. It allegedly shows “on certain dates the cashout revenue was
679 insufficient to avoid a negative cost consequence to sales customers.” (Ameren Ex.
680 34.0, p. 26) However, as noted these are “examples” and refer to “certain dates.”
681 Thus these are selected dates showing those times when the PGA was less than or
682 equal to the Chicago Citygate Price (“CCP”). Ameren has not established that
683 there was any harm on these dates from this behavior. Additionally, as Mr. Eggers
684 acknowledges, this is not the typical case due to decreasing prices and the hedging
685 that Ameren undertakes. (Ameren Ex. 34.0, p. 26)

686

687 **Q. How else did Ameren respond to your recommendation to reject its**
688 **proposal to charge the greater of market or the PGA for under deliveries**
689 **and the less of the two for over deliveries on a customer by customer**
690 **basis?**

691 A. Mr. Eggers claims that:

692 Ameren Exhibit 34.5 shows the Daily balanced Transportation customer
693 imbalance history from the October 1, 2008 to February of 2011 for all three
694 Rate Zones. ... The data supports the conclusion that our cashout
695 provisions encourage under-delivery. The data also shows that on some
696 days, the cashout is all on the under-delivery side, even on summer days
697 when we expect transportation customers to over-deliver to fill their banks.
698 Clearly, the data shows that transportation customers are not adequately
699 managing nominations and deliveries to avoid the current cashout
700 provisions.
701 (*Id.*, p. 28)

702

703 **Q. Does Exhibit 34.5 show that the net under-deliveries caused harm to sales**
704 **customers?**

705 A. No. The market price is a reasonable measure of the cost to Ameren to balance its
706 system in the face of transportation customers' imbalances as a group. The out of
707 deadband imbalances of some of the customers inure to the benefit of sales
708 customers.

709

710 **Q. How much do transportation customers pay to sales customers annually in**
711 **above market premiums for the gas that they cashout?**

712 A. According to Ameren Ex. 34.5, transportation customers paid \$140,000 in 2009 and
713 \$151,000 in 2010 in Rate Zone 1 in premiums for the gas cashout at 110% and
714 90% to the benefit of sales customers. Ameren transportation customers paid
715 \$131,000 in 2009 and \$152,000 in 2010 in Rate Zone 2 in premiums for the gas
716 cashout at 110% and 90% to the benefit of sales customers. Ameren
717 transportation customers paid \$279,000 in 2009 and \$309,000 in 2010 in Rate
718 Zone 3 in premiums for the gas cashout at 110% and 90% to the benefit of sales
719 customers. This is an average of \$583,000 per year in premiums for using those
720 assets.

721

722 **Q. What conclusions are more appropriate concerning Ameren Ex. 34.5 than**
723 **those which Mr. Eggers has drawn?**

724 A. This exhibit does show that there is a net of 33,289 therms of average daily under-
725 delivery on the total system. However, Mr. Eggers fails to point out that this is less
726 than 0.2% of the system peak day of 17,325,720 therms and less than 0.6% of
727 transportation MDCQs of 5,481,800 therms.⁶ It is a tiny fraction of the system and
728 this is the *net* harm, it is not for selected days. The fact that this number is so
729 inconsequential effectively undermines Ameren's whole argument.

730

731 **Q. What additional conclusions can be derived from Exhibits 34.4 and 34.5?**

732 A. Since October 1, 2008, transportation customers have paid almost \$600,000
733 annually in premiums to the CCP by paying 10% more for gas outside the 20%
734 deadband and receiving 10% less than the market price for gas delivered in excess
735 of the 20% deadband. There is no evidence that the 33,289 therms daily average
736 harms the system. This tendency to under deliver will totally disappear if a CD is
737 declared due to \$6 per therm penalty. And on any other day, it does not appear to
738 be destabilizing to the system.

739

740 **5. Reject Ameren's method for recovering unsubscribed bank**
741 **capacity because it is not properly specified.**

742 **Q. Did you agree with the Unsubscribed Bank Capacity Charge ("UBCC") as**
743 **proposed in Rider S by Ameren?**

⁶ Ameren response to Staff DR DAS 4.05 incorrectly uses the *sales* system peak.

744 A. No. As discussed in Ms. Jones' testimony (ICC Staff Exhibit 6.0, pp. 12-14), the
745 formula to calculate the UBCC was not included in Rider S.

746

747 **Q. Has the UBCC been properly specified at this time?**

748 A. My understanding is that Ameren has now provided the formula to calculate the
749 UBCC and agrees with Ms. Jones that it should be included in Rider S. (ICC Staff
750 Ex. 23.0, p. 4)

751

752 **Q. What do you recommend with regard to the UBCC?**

753 A. I recommend that the Commission approve the UBCC.

754

755 **Q. Does this conclude your prepared rebuttal testimony?**

756 A. Yes.

Ameren Illinois Highest Usage and Corresponding Gas Day (Past 5 Heating Seasons)

All Volumes in Dth and include sales and transportation usage by gas day (9 a.m. start)

HEATING SEASON

	Rate Zone I		Rate Zone II		Rate Zone III	
	<u>Volume</u>	<u>Date</u>	<u>Volume</u>	<u>Date</u>	<u>Volume</u>	<u>Date</u>
2006/2007	250,049	2/5/2007	400,752	2/4/2007	573,899	2/5/2007
2007/2008	255,850	1/24/2008	394,545	1/19/2008	563,327	1/24/2008
2008/2009	279,758	1/15/2009	423,312	1/15/2009	650,290	1/15/2009
2009/2010	264,451	1/4/2010	378,213	1/4/2010	585,250	1/4/2010
2010/2011	244,190	2/9/2011	364,090	2/9/2011	548,341	2/9/2011

TOTAL PEAK DAY	
<u>Volume</u>	<u>Date</u>
1,204,703	2/4/2007
1,206,796	1/24/2008
1,353,360	1/15/2009
1,227,914	1/4/2010
1,156,621	2/9/2011

Rate Zone I										
	2/5/2007		1/24/2008		1/15/2009		1/4/2010		2/9/2011	
	Total MDCQ	Total DCN								
GDS 2	n/a	9398	n/a	2904	n/a	0	36828	59	39141	146
GDS 3	n/a	3424	n/a	3816	n/a	1951	104651	804	98093	0
GDS 4	n/a	117090	n/a	71905	n/a	34053	458436	48231	487268	48610
GDS 5	n/a	20	n/a	0	n/a	0	77847	0	134886	0
GDS 7	n/a	0	n/a	0	n/a	0	0	0	0	0
Monthly Pool Group	n/a	0	n/a	0	n/a	22702	n/a	64122	n/a	59066
Daily Pool Group	n/a	52977	n/a	93583	n/a	262456	n/a	251688	n/a	207064
Total	n/a	182909	n/a	172207	n/a	321163	677762	364903	759388	314887

Rate Zone II										
	2/5/2007		1/24/2008		1/15/2009		1/4/2010		2/9/2011	
	Total MDCQ	Total DCN								
GDS 2	n/a	442	n/a	1382	n/a	0	41921	116	47363	243
GDS 3	n/a	10201	n/a	13118	n/a	2523	74360	828	87432	195
GDS 4	n/a	327789	n/a	359160	n/a	34105	730780	426738	967695	429078
GDS 5	n/a	0	n/a	0	n/a	0	214522	0	283209	0
GDS 7	n/a	0	n/a	0	n/a	5936	453660	0	495520	0
Monthly Pool Group	n/a	0	n/a	0	n/a	41561	n/a	104324	n/a	70433
Daily Pool Group	n/a	0	n/a	0	n/a	456168	n/a	316838	n/a	618184
Total	n/a	338431	n/a	373660	n/a	540292	1515243	848844	1881219	1118133

Rate Zone III										
	2/5/2007		1/24/2008		1/15/2009		1/4/2010		2/9/2011	
	Total MDCQ	Total DCN								
GDS 2	n/a	371	n/a	354	n/a	886	379942	367	427314	185
GDS 3	n/a	2189	n/a	9278	n/a	5437	153233	4378	191883	2646
GDS 4	n/a	411957	n/a	372484	n/a	480251	2094025	492048	2161249	476554
GDS 5	n/a	0	n/a	0	n/a	0	335156	0	361160	0
GDS 7	n/a	0	n/a	0	n/a	0	0	0	0	0
Monthly Pool Group	n/a	144091	n/a	153358	n/a	70711	n/a	93911	n/a	116216
Daily Pool Group	n/a	197467	n/a	183684	n/a	518410	n/a	374421	n/a	472270
Total	n/a	756075	n/a	719158	n/a	1075694	2962356	965125	3141606	1067871

Ameren Illinois Total										
	2/5/2007		1/24/2008		1/15/2009		1/4/2010		2/9/2011	
	Total MDCQ	Total DCN								
GDS 2	n/a	10211	n/a	4640	n/a	886	458691	542	513818	574
GDS 3	n/a	15814	n/a	26211	n/a	9910	332244	6010	377408	2841
GDS 4	n/a	856837	n/a	803549	n/a	548409	3283241	967017	3616212	954242

GDS 5	n/a	20	n/a	0	n/a	0	627525	0	779255	0
GDS 7	n/a	0	n/a	0	n/a	5936	453660	0	495520	0
Monthly Pool Group	n/a	144091	n/a	153358	n/a	134974	n/a	262357	n/a	245714
Daily Pool Group	n/a	250444	n/a	277267	n/a	1237034	n/a	942947	n/a	1297518
Total	n/a	1277416	n/a	1265025	n/a	1937149	5155361	2178873	5782213	2500891

All volumes in Therms, totals may differ by one or two therms due to rounding during data collection

Monthly Pool Groups contain GDS 2 and GDS 3 customers that cannot be distinguished within the Pool totals

Daily Pool Groups may include GDS 4 and GDS 7 customers that cannot be distinguished within the Pool totals

MDCQ data is unavailable prior to April of 2009.