

Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos.
Proposed General Increase in Electric and Gas Delivery Service Rates
Response Date: 03/29/2011

ST 4.04

Referring to Schedule C-10, Rate Case Expense, please provide all facts, information, data, analyses and assessments, including all requests for proposals, bids, invoices, engagement letters, contracts, and other supporting documentation, supporting the contention that the amounts set forth in rate case expense are just and reasonable amounts to prepare and litigate the current general rate case.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford
Title: Manager, Regulatory Accounting
Phone Number: 314-206-0584

ST 4.04 Attach 1 through 10 (each designated **CONFIDENTIAL and PROPRIETARY**), are submitted as supporting documentation for the just and reasonable costs to prepare and litigate the current rate case as identified in Schedule C-10, line 1, column B.

ST 4.04 Attach 1 and ST 4.04 Attach 6 provide support for the PricewaterhouseCoopers LLP fees estimate.

ST 4.04 Attach 2 and ST 4.04 Attach 3 provide support for the Accenture LLP fees and other expenses estimate.

ST 4.40 Attach 4 provides support for the Carpenter Lipps & Leland LLP fees and other expenses estimate.

ST 4.04 Attach 5 provides support for the Concentric Energy Advisors fees and other expenses estimate.

ST 4.04 Attach 7 provides support for the Towers Watson fees estimate.

ST 4.04 Attach 8 provides support for the Jones Day fees estimate.

ST 4.04 Attach 9 provides support for the SFIO Consulting Inc. fees estimate.

ST 4.04 Attach 10 provides the rate case expenses from the prior dockets 09-0306 thru 09-0311 (cons). These expenses were used to estimate 2012 rate case expenses listed below. The following are the 2012 rate case expenses based on the prior rate case: expense travel/other expenses for SFIO Consulting, expense travel/other expenses for Towers Watson, fees and expense travel/other expenses for Other Rebuttal Witnesses, expense travel/other expenses for Other Costs, and expense travel/other expenses for Jones Day.

The 2012 Copying, Printing, and Delivery Services included in the Other category were reduced to one third of the total prior docket expense. This reduction was based on the current filing of two cases vs. the six cases in the prior submittal.

In addition to the foregoing documentation, AIC in planning and budgeting for the preparation, filing and litigation of its 2011 delivery services rate cases sought to incur only prudent and reasonable rate case expenses. The Company considered, among other factors, its proposed, approved, and actual rate case expenses from its 2008 test year rate cases (ICC Docket Nos. 09-0306/09-0311), the filing and direct testimony requirements under Parts 285, 286, and 287 of the ICC's rules, including additional requirements for submission of a future test year, and the additional information filed as a result of certain issues and directives in the prior rate case and pursuant to the prior rate case order. AIC's rate case expense estimates took into account the efficiencies resulting from the simultaneous preparation of two rather than six rate filings, the internal resources available for case preparation and execution of the 2011 rate cases and contracting for outside resources where required. As to the use of outside resources, the AIUs negotiated appropriate compensation rates which were based primarily on the agreed scope of work and the level of technical expertise required. The approved compensation rates were applied to the estimated hours of work to complete the assignment being requested, except where consultant rates were based on a fixed fee arrangement for a portion or all of their costs. The preparation of the Part 285 filing requirements and direct testimony and supporting evidence required by Part 286 was a very significant, complicated project that took approximately six months to complete, and required the testimony of 15 witnesses in its direct filing to provide a complete justification for our request. This extensive effort to provide adequate supporting evidence for the AIC's electric and gas rate filings also required a more significant use of legal services to support each witness. The hiring of an outside legal support team also took into account the extensive procedures that are involved in litigating a rate case before the ICC after the case is filed. The subsequent steps include an extensive discovery process (to date AIC has well over over 400 single part or multi-part data requests), analysis of Staff and intervenor direct and rebuttal testimony, the preparation of rebuttal and surrebuttal testimony, an evidentiary hearing, post-hearing briefs and reply briefs, analysis of an ALJs' proposed Order, briefs and reply briefs on exceptions, analysis of the ICC's final Order, and preparation of a compliance filing.

Because of the comprehensive requirements of Part 285, AIC decided to again draw on the assistance of Concentric Energy Advisors, a nationally recognized firm consisting of consultants that have experience in supporting the standard filing requirements for ICC

rate cases, and many of the Concentric consultants had served in a similar role for the prior AIC DS rate cases. Concentric also performed benchmarking, common plant asset separation analysis, lead-lag analyses, and evidence in support of the requested returns on common equity for the AIC in addition to providing support for certain data request response preparation. The personnel at Concentric are highly experienced and, as a result, are able to provide efficient service. Further, given Concentric's knowledge of AIC's personnel and systems, efficiency was gained by continuing to use this firm.

PricewaterhouseCoopers conducted the audit of future test year information provided in compliance with section 285.7010. Since Pricewaterhouse Coopers is Ameren's auditor for historical financial information, use of this firm is beneficial from an understanding of Ameren Illinois' financial systems and financial reporting. As a result, AIC benefited from that working knowledge and efficiency in completion of the Part 285 audit requirements.

Accenture LLP conducted an extensive review of the AIC's merger integration efforts and therefore, was uniquely positioned to explain and support the impact of merger related initiatives on the AIC filing.

Towers Watson provided expert guidance and testimony related to the AIUs' pension, OPEB costs and cost recovery. Towers Watson is nationally recognized in this area of expertise.

SFIO Consulting Inc. has extensive experience with regulatory matters before the ICC along with the preparation and filing of future test year information. SFIO assisted the AIC in supporting our future test year filing including review of schedules for compliance with part 285 requirements, assembly of testimony and evidence in support of our rate filings, and ongoing support in responding to data requests and other evidentiary matters.

Jones Day and Carpenter Lipps & Leland were both hired as external law firms due to having counsel experienced in working with AIC on various ICC matters. As a result, these firms are positioned to provide support for AIC's rate case strategy, preparation, filing and litigation. These firm's rates are negotiated every two years. Both firms are highly experienced and, as a result, are able to provide efficient service.

The amounts on AIC's Part 285 Schedule C-10 reflect prudent and reasonable budget estimates for the work of the outside consultants, outside witnesses, outside legal counsel, and the costs of copying, printing and travel expenses for the rate case. The most recent rate case filings for the Ameren Illinois Utilities enabled AIC, consultants and lawyers to prepare realistic budget estimates. The rate case expense estimate also reflects additional external witnesses for the rebuttal stage of the case based on rebuttal stage costs incurred in the prior rate cases. The ICC in its prior rate case Orders did not find any rate case expenses based on the work of any of the outside support that are included on the AIU Schedule C-10 to be anything other than prudent and reasonable. It should be noted that a

great part of a utility's rate case expenses are incurred after the rate case is filed through the issuance of the ICC's final Order.

Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282
Proposed General Increase in Electric and Gas Delivery Service Rates
Response Date: 4/21/2011

ST 5.10

Referring to WPC-10, please provide monthly updates of rate case expense incurred. This should include invoices from consultants detailing actual hours billed and expenses incurred and a comparison of actual versus estimated fees and expenses.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford
Title: Manager, Regulatory Accounting
Phone Number: 314-206-0584

ST 5.10 Attach 1 through 3 (each designated **CONFIDENTIAL and PROPRIETARY**), are submitted as supporting documentation for the actual rate case expenses incurred. Attach 1, is a summary of the invoices and documents of the actual versus estimated fees and expenses. On a limited basis, certain work description information has been redacted within pp. 45-106 of Attach 3.

Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282 (Cons.)
Proposed General Increase in Electric and Gas Delivery Service Rates
Data Request Response Date: 06/03/2011

ST 5.10S

Referring to WPC-10, please provide monthly updates of rate case expense incurred. This should include invoices from consultants detailing actual hours billed and expenses incurred and a comparison of actual versus estimated fees and expenses.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford
Title: Manager, Regulatory Accounting
Phone Number: 314-206-0584

ST 5.10S Attach 1 and 2 (each designated **CONFIDENTIAL and PROPRIETARY**), are submitted as supporting documentation for the monthly update of actual rate case expenses incurred. Attach 1, is an updated summary of the invoices and the comparison of actual versus estimated costs. The highlighted items have been added since the last update. Attach 2 includes the copies of invoices for the highlighted items in Attach 1.

**Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282 (Cons.)
Proposed General Increase in Electric and Gas Delivery Service Rates
2nd Supplemental Response Date: 8/4/2011**

ST 5.102S

Referring to WPC-10, please provide monthly updates of rate case expense incurred. This should include invoices from consultants detailing actual hours billed and expenses incurred and a comparison of actual versus estimated fees and expenses.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

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

ST 5.102S Attach 1 and 2 (each designated **CONFIDENTIAL and PROPRIETARY**), are submitted as supporting documentation for the update of actual rate case expenses incurred. Attach 1, is an updated summary of the invoices and the comparison of actual versus estimated costs. The highlighted items have been added since the last update. Attach 2 includes the copies of invoices for the highlighted items in Attach 1.

**Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282 (Cons.)
Proposed General Increase in Electric and Gas Delivery Service Rates
Data Request Response Date: 8/16/2011**

ST 14.01

Please provide the actual rate case expense from the prior rate case, excluding the rehearing, in the same format as Schedule WPC-10.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford

Title: Manager, Regulatory Accounting

Phone Number: 314-206-0584

See ST 14.01 Attach (designated **CONFIDENTIAL and PROPRIETARY**) for the requested rate case expenses excluding rehearing expenses.

**Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282 (Cons.)
Proposed General Increase in Electric and Gas Delivery Service Rates
Data Request Response Date: 8/16/2011**

ST 14.02

Please provide a reconciliation between the amount of rate case expense authorized in the prior rate case and the rate case expense detailed in the response to ST-14.01.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford

Title: Manager, Regulatory Accounting

Phone Number: 314-206-0584

See ST 14.02 Attach (designated **CONFIDENTIAL and PROPRIETARY**) for the requested rate case expense reconciliation.

Ameren Illinois Company
Response to ICC Staff Data Requests
Docket Nos. 11-0279 and 11-0282 (Cons.)
Proposed General Increase in Electric and Gas Delivery Service Rates
Data Request Response Date: 8/16/2011

ST 14.03

Please provide the following rate case expense information for each of the providers listed on Schedule WPC-10:

- a) Actual expenses incurred through June 30, 2011. Amounts should be allocated to the following time periods: Part 285 filing, work through surrebuttal, evidentiary hearing, work through Commission's Final Order.
- b) Estimated expenses remaining allocated to the following time periods: Part 285 filing, work through surrebuttal, evidentiary hearing, work through Commission's Final Order.
- c) The information provided for parts a) and b) above should include the nature of the service provided for each time period.

RESPONSE: (Do not edit or delete this line or anything above this. Start typing your response right BELOW Phone Number.)

Prepared By: Ronald D. Stafford
Title: Manager, Regulatory Accounting
Phone Number: 314-206-0584

ST 14.03 Attach (designated **CONFIDENTIAL and PROPRIETARY**) provides the requested information for a), b), and c) above.

- a) ST 14.03 Attach columns (B) through (F) provides actual rate case expenses through June 30, 2011 processed to date in the requested format. Please note, the Company has not received all invoices for work performed through.
- b) ST 14.03 Attach columns (G) through (K) provides estimated expenses remaining for the requested time periods. Any charges for work performed through June not yet received and processed become part of the estimated amount in column (G). Actual plus estimated remaining expenses in columns (B) and (G), respectively, total \$6,841,710.
- c) ST 14.03 Attach, column (A) identifies the nature of the service provided.