

**Ameren Illinois Company
Normalized Storm Costs
Based on 2005 - 2010 Costs**

Line #	Resource Type	2005	2006	2007	2008	2009	2010	Jan-Jun 2011
1	34 - PURCHASING RATE-AP LOADING			\$0.00	\$58.52	\$14,536.78	\$1,419.33	\$7,643.47
2	35 - STORES HANDLING LOADING	\$389.52	\$3,829.47	-\$170.56	\$1,751.02	\$3,649.40	\$90.23	\$1,680.46
3	40 - MATERIALS-STOCK	\$1,900.90	\$18,323.48	\$55,016.03	-\$28,792.06	\$39,661.91	\$644.51	\$10,623.20
4	41 - MATERIALS-ADJUSTMENTS		\$52.27					
5	80 - INDIVIDUAL EXPENSES	\$12,171.61	\$437,337.97	\$153,209.69	\$174,991.53	\$267,684.49	\$14,296.93	\$262,547.94
6	82 - NON-TAXABLE MEALS & ENTERTAIN			\$30,402.67	\$81,184.05	\$193,150.34	\$15,609.74	\$174,604.72
7	EC - CONTRACT SERVICES	\$1,035,050.42	\$5,092,425.78	\$8,511,161.13	\$2,968,891.57	\$5,892,867.62	\$67,342.56	\$1,589,788.41
8	ED - T&D CONSTRUCTION CONTRACTORS		\$18,358.83	\$14,893,757.44	\$4,568,645.55	\$6,792,077.24	\$946,405.53	\$8,216,527.18
9	EI - ACCOUNTING ENTRIES-OTHER		\$18,944,303.60	-\$19,044,955.64	\$5,470,172.37	-\$5,181,538.20	-\$22,555.30	\$0.00
10	EX - PROFESSIONAL SERVICES-OTHER		\$20,208.99	\$2,902.28	\$4,724.41	\$31,161.73	\$106.98	\$2,128.18
11	LU - LABOR-UNION	\$604,195.75	\$3,813,146.17	\$1,771,994.49	\$4,319,682.35	\$2,823,894.82	\$799,251.00	\$2,619,509.70
12	Total	\$1,653,708.20	\$28,347,986.56	\$6,373,317.53	\$17,561,309.31	\$10,877,146.13	\$1,822,611.51	\$12,885,053.26

Storm exp accts 583-586 and 593-596 & 903

6 Yr 2005-2010

PPI - Inflation factor (1)	1.22	1.13	1.10	1.05	1.02	1.00	1.02	1.02	
Resource Type	2005	2006	2007	2008	2009	2010	6 Yr Avg	2011	2012
34 - PURCHASING RATE-AP LOADING	\$0.00	\$0.00	\$0.00	\$61.24	\$14,866.90	\$1,419.33	\$2,724.58	2,779.07	2,834.65
35 - STORES HANDLING LOADING	\$474.99	\$4,345.17	-\$187.34	\$1,832.40	\$3,732.28	\$90.23	\$1,714.62	1,748.91	1,783.89
40 - MATERIALS-STOCK	\$2,318.00	\$20,791.02	\$60,429.72	-\$30,130.15	\$40,562.61	\$644.51	\$15,769.29	16,084.67	16,406.36
41 - MATERIALS-ADJUSTMENTS	\$0.00	\$59.31	\$0.00	\$0.00	\$0.00	\$0.00	\$9.89	10.08	10.28
80 - INDIVIDUAL EXPENSES	\$14,842.32	\$496,232.31	\$168,285.83	\$183,124.15	\$273,763.46	\$14,296.93	\$191,757.50	195,592.65	199,504.50
82 - NON-TAXABLE MEALS & ENTERTAIN	\$0.00	\$0.00	\$33,394.35	\$84,957.03	\$197,536.68	\$15,609.74	\$55,249.63	56,354.63	57,481.72
EC - CONTRACT SERVICES	\$1,262,162.32	\$5,778,199.89	\$9,348,676.56	\$3,106,868.90	\$6,026,691.55	\$67,342.56	\$4,264,990.30	4,350,290.10	4,437,295.90
ED - T&D CONSTRUCTION CONTRACTORS	\$0.00	\$20,831.13	\$16,359,333.24	\$4,780,970.42	\$6,946,321.75	\$946,405.53	\$4,842,310.35	4,939,156.55	5,037,939.68
EI - ACCOUNTING ENTRIES-OTHER	\$0.00	\$21,495,447.87	-\$20,919,017.72	\$5,724,395.12	-\$5,299,208.21	-\$22,555.30	\$163,176.96	166,440.50	169,769.31
EX - PROFESSIONAL SERVICES-OTHER	\$0.00	\$22,930.44	\$3,187.87	\$4,943.97	\$31,869.40	\$106.98	\$10,506.44	10,716.57	10,930.90
LU - LABOR-UNION	\$736,769.05	\$4,326,645.44	\$1,946,362.32	\$4,520,436.82	\$2,888,023.99	\$799,251.00	\$2,536,248.10	2,586,973.07	2,638,712.53
PPI Adjusted Total	\$2,016,566.68	\$32,165,482.58	\$7,000,464.83	\$18,377,459.90	\$11,124,160.41	\$1,822,611.51	\$12,084,457.65	\$12,326,146.80	\$12,572,669.74

5 Yr 2005-2009

PPI - Inflation factor (1)	1.19	1.11	1.07	1.02	1.00	PPI factor	1.02	1.02	1.02
Resource Type	2005	2006	2007	2008	2009	5 Yr Avg	2010	2011	2012
34 - PURCHASING RATE-AP LOADING	\$0.00	\$0.00	\$0.00	\$59.88	\$14,536.78	\$2,919.33	2,977.72	3,037.27	3,098.02
35 - STORES HANDLING LOADING	\$464.44	\$4,248.68	-\$183.18	\$1,791.71	\$3,649.40	\$1,994.21	2,034.09	2,074.78	2,116.27
40 - MATERIALS-STOCK	\$2,266.53	\$20,329.35	\$59,087.86	-\$29,461.11	\$39,661.91	\$18,376.91	18,744.45	19,119.34	19,501.72
41 - MATERIALS-ADJUSTMENTS	\$0.00	\$57.99	\$0.00	\$0.00	\$0.00	\$11.60	11.83	12.07	12.31
80 - INDIVIDUAL EXPENSES	\$14,512.74	\$485,213.37	\$164,549.01	\$179,057.84	\$267,684.49	\$222,203.49	226,647.56	231,180.51	235,804.12
82 - NON-TAXABLE MEALS & ENTERTAIN	\$0.00	\$0.00	\$32,652.83	\$83,070.54	\$193,150.34	\$61,774.74	63,010.24	64,270.44	65,555.85
EC - CONTRACT SERVICES	\$1,234,135.75	\$5,649,893.76	\$9,141,087.27	\$3,037,880.24	\$5,892,867.62	\$4,991,172.93	5,090,996.39	5,192,816.31	5,296,672.64
ED - T&D CONSTRUCTION CONTRACTORS	\$0.00	\$20,368.57	\$15,996,070.86	\$4,674,807.99	\$6,792,077.24	\$5,496,664.93	5,606,598.23	5,718,730.20	5,833,104.80
EI - ACCOUNTING ENTRIES-OTHER	\$0.00	\$21,018,137.01	-\$20,454,506.60	\$5,597,283.75	-\$5,181,538.20	\$195,875.19	199,792.70	203,788.55	207,864.32
EX - PROFESSIONAL SERVICES-OTHER	\$0.00	\$22,421.27	\$3,117.08	\$4,834.19	\$31,161.73	\$12,306.85	12,552.99	12,804.05	13,060.13
LU - LABOR-UNION	\$720,408.94	\$4,230,571.38	\$1,903,142.95	\$4,420,059.58	\$2,823,894.82	\$2,819,615.53	2,876,007.84	2,933,528.00	2,992,198.56
PPI Adjusted Total	\$1,971,788.40	\$31,451,241.38	\$6,845,018.08	\$17,969,384.61	\$10,877,146.13	\$13,822,915.72	\$14,099,374.03	\$14,381,361.52	\$14,668,988.75

Based on Bureau of Labor Statistics Producer Price Index for Electric Power Distribution Industry, see Ameren Exhibit 46.4.

Ameren Illinois Company
Normalized Storm Costs
Based on 2005 - June 2011 Costs

Line #	Resource Type	July - Dec 2005	2006	2007	2008	2009	2010	Jan-Jun 2011
1	34 - PURCHASING RATE-AP LOADING			\$0.00	\$58.52	\$14,536.78	\$1,419.33	\$ 7,643.47
2	35 - STORES HANDLING LOADING		\$3,829.47	-\$170.56	\$1,751.02	\$3,649.40	\$90.23	\$ 1,680.46
3	40 - MATERIALS-STOCK		\$18,323.48	\$55,016.03	-\$28,792.06	\$39,661.91	\$644.51	\$ 10,623.20
4	41 - MATERIALS-ADJUSTMENTS		\$52.27					
5	80 - INDIVIDUAL EXPENSES	\$3,945.12	\$437,337.97	\$153,209.69	\$174,991.53	\$267,684.49	\$14,296.93	\$ 262,547.94
6	82 - NON-TAXABLE MEALS & ENTERTAIN			\$30,402.67	\$81,184.05	\$193,150.34	\$15,609.74	\$ 174,604.72
7	EC - CONTRACT SERVICES	\$763,781.91	\$5,092,425.78	\$8,511,161.13	\$2,968,891.57	\$5,892,867.62	\$67,342.56	\$ 1,589,788.41
8	ED - T&D CONSTRUCTION CONTRACTORS		\$18,358.83	\$14,893,757.44	\$4,568,645.55	\$6,792,077.24	\$946,405.53	\$ 8,216,527.18
9	EI - ACCOUNTING ENTRIES-OTHER		\$18,944,303.60	-\$19,044,955.64	\$5,470,172.37	-\$5,181,538.20	-\$22,555.30	\$ -
10	EX - PROFESSIONAL SERVICES-OTHER		\$20,208.99	\$2,902.28	\$4,724.41	\$31,161.73	\$106.98	\$ 2,128.18
11	LU - LABOR-UNION	\$209,327.00	\$3,813,146.17	\$1,771,994.49	\$4,319,682.35	\$2,823,894.82	\$799,251.00	\$ 2,619,509.70
12	Grand Total	\$977,054.03	\$28,347,986.56	\$6,373,317.53	\$17,561,309.31	\$10,877,146.13	\$1,822,611.51	\$12,885,053.26

Storm exp accts 583-586 and 593-596 & 903

6 Yrs July 2005 - June 2011

Resource Type	2005	2006	2007	2008	2009	2010	Jan-Jun 2011	6 Yr Avg	July - Dec 2011	2012
PPI - Inflation factor (1)	1.24	1.16	1.12	1.07	1.04	1.02	1.00		1.01	1.02
34 - PURCHASING RATE-AP LOADING			\$0.00	\$62.46	\$15,164.24	\$1,447.72	\$7,643.47	\$4,052.98	4,093.51	4,175.38
35 - STORES HANDLING LOADING	\$0.00	\$4,432.07	(\$191.09)	\$1,869.05	\$3,806.92	\$92.03	\$1,680.46	\$1,948.24	1,967.72	2,007.08
40 - MATERIALS-STOCK	\$0.00	\$21,206.84	\$61,638.31	(\$30,732.76)	\$41,373.86	\$657.40	\$10,623.20	\$17,461.14	17,635.75	17,988.47
41 - MATERIALS-ADJUSTMENTS		\$60.50	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$10.08	10.18	10.39
80 - INDIVIDUAL EXPENSES	\$4,906.98	\$506,156.96	\$171,651.55	\$186,786.63	\$279,238.73	\$14,582.87	\$262,547.94	\$237,645.28	240,021.73	244,822.16
82 - NON-TAXABLE MEALS & ENTERTAIN		\$0.00	\$34,062.24	\$86,656.17	\$201,487.42	\$15,921.93	\$174,604.72	\$85,455.41	86,309.97	88,036.17
EC - CONTRACT SERVICES	\$949,999.21	\$5,893,763.88	\$9,535,650.10	\$3,169,006.28	\$6,147,225.38	\$68,689.41	\$1,589,788.41	\$4,559,020.45	4,604,610.65	4,696,702.86
ED - T&D CONSTRUCTION CONTRACTORS		\$21,247.75	\$16,686,519.90	\$4,876,589.83	\$7,085,248.19	\$965,333.64	\$8,216,527.18	\$6,308,577.75	6,371,663.53	6,499,096.80
EI - ACCOUNTING ENTRIES-OTHER		\$21,925,356.83	(\$21,337,398.07)	\$5,838,883.03	(\$5,405,192.38)	(\$23,006.41)	\$0.00	\$166,440.50	168,104.91	171,467.00
EX - PROFESSIONAL SERVICES-OTHER		\$23,389.05	\$3,251.63	\$5,042.85	\$32,506.78	\$109.12	\$2,128.18	\$11,071.27	11,181.98	11,405.62
LU - LABOR-UNION	\$260,362.92	\$4,413,178.35	\$1,985,289.57	\$4,610,845.55	\$2,945,784.47	\$815,236.02	\$2,619,509.70	\$2,941,701.10	2,971,118.11	3,030,540.47
PPI Adjusted Total	\$1,215,269.11	\$32,808,792.23	\$7,140,474.14	\$18,745,009.09	\$11,346,643.61	\$1,859,063.73	\$12,885,053.26	\$14,333,384.20	\$14,476,718.04	\$14,766,252.40

5 Yrs 2006 - 2010

Resource Type	2006	2007	2008	2009	2010	Jan-Jun 2011	5 Yr Avg	2011	2012
PPI - Inflation factor (1)	1.13	1.10	1.05	1.02	1.00	1.00		1.02	1.02
34 - PURCHASING RATE-AP LOADING	\$0.00	\$0.00	\$61.24	\$14,866.90	\$1,419.33	\$0.00	\$3,269.49	\$3,334.88	\$3,401.58
35 - STORES HANDLING LOADING	\$4,345.17	(\$187.34)	\$1,832.40	\$3,732.28	\$90.23	\$0.00	\$1,962.55	\$2,001.80	\$2,041.83
40 - MATERIALS-STOCK	\$20,791.02	\$60,429.72	(\$30,130.15)	\$40,562.61	\$644.51	\$0.00	\$18,459.54	\$18,828.73	\$19,205.31
41 - MATERIALS-ADJUSTMENTS	\$59.31	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$11.86	\$12.10	\$12.34
80 - INDIVIDUAL EXPENSES	\$496,232.31	\$168,285.83	\$183,124.15	\$273,763.46	\$14,296.93	\$0.00	\$227,140.54	\$231,683.35	\$236,317.01
82 - NON-TAXABLE MEALS & ENTERTAIN		\$0.00	\$33,394.35	\$84,957.03	\$197,536.68	\$15,609.74	\$0.00	\$66,299.56	\$67,625.55
EC - CONTRACT SERVICES	\$5,778,199.89	\$9,348,676.56	\$3,106,868.90	\$6,026,691.55	\$67,342.56	\$0.00	\$4,865,555.89	\$4,962,867.01	\$5,062,124.35
ED - T&D CONSTRUCTION CONTRACTORS	\$20,831.13	\$16,359,333.24	\$4,780,970.42	\$6,946,321.75	\$946,405.53	\$0.00	\$5,810,772.41	\$5,926,987.86	\$6,045,527.62
EI - ACCOUNTING ENTRIES-OTHER	\$21,495,447.87	(\$20,919,017.72)	\$5,724,395.12	(\$5,299,208.21)	(\$22,555.30)	\$0.00	\$195,812.35	\$199,728.60	\$203,723.17
EX - PROFESSIONAL SERVICES-OTHER	\$22,930.44	\$3,187.87	\$4,943.97	\$31,869.40	\$106.98	\$0.00	\$12,607.73	\$12,859.89	\$13,117.08
LU - LABOR-UNION	\$4,326,645.44	\$1,946,362.32	\$4,520,436.82	\$2,888,023.99	\$799,251.00	\$0.00	\$2,896,143.91	\$2,954,066.79	\$3,013,148.13
PPI Adjusted Total	\$32,165,482.58	\$7,000,464.83	\$18,377,459.90	\$11,124,160.41	\$1,822,611.51	\$0.00	\$14,098,035.85	\$14,379,996.56	\$14,667,596.49

Based on Bureau of Labor Statistics Producer Price Index for Electric Power Distribution Industry, see Ameren Exhibit 46.4.

Ameren Illinois Company
Normalized Storm Costs
Based on 2005 - June 2011 Costs

Line #	Resource Type	2005	2006	2007	2008	2009	2010	Jan-Jun 2011
1	34 - PURCHASING RATE-AP LOADING			\$0.00	\$58.52	\$14,536.78	\$1,419.33	\$ 7,643.47
2	35 - STORES HANDLING LOADING	\$389.52	\$3,829.47	-\$170.56	\$1,751.02	\$3,649.40	\$90.23	\$ 1,680.46
3	40 - MATERIALS-STOCK	\$1,900.90	\$18,323.48	\$55,016.03	-\$28,792.06	\$39,661.91	\$644.51	\$ 10,623.20
4	41 - MATERIALS-ADJUSTMENTS		\$52.27					
5	80 - INDIVIDUAL EXPENSES	\$12,171.61	\$437,337.97	\$153,209.69	\$174,991.53	\$267,684.49	\$14,296.93	\$ 262,547.94
6	82 - NON-TAXABLE MEALS & ENTERTAIN			\$30,402.67	\$81,184.05	\$193,150.34	\$15,609.74	\$ 174,604.72
7	EC - CONTRACT SERVICES	\$1,035,050.42	\$5,092,425.78	\$8,511,161.13	\$2,968,891.57	\$5,892,867.62	\$67,342.56	\$ 1,589,788.41
8	ED - T&D CONSTRUCTION CONTRACTORS		\$18,358.83	\$14,893,757.44	\$4,568,645.55	\$6,792,077.24	\$946,405.53	\$ 8,216,527.18
9	EI - ACCOUNTING ENTRIES-OTHER		\$18,944,303.60	-\$19,044,955.64	\$5,470,172.37	-\$5,181,538.20	-\$22,555.30	\$ -
10	EX - PROFESSIONAL SERVICES-OTHER	\$0.00	\$20,208.99	\$2,902.28	\$4,724.41	\$31,161.73	\$106.98	\$ 2,128.18
11	LU - LABOR-UNION	\$604,195.75	\$3,813,146.17	\$1,771,994.49	\$4,319,682.35	\$2,823,894.82	\$799,251.00	\$ 2,619,509.70
12	Total	<u>\$1,653,708.20</u>	<u>\$28,347,986.56</u>	<u>\$6,373,317.53</u>	<u>\$17,561,309.31</u>	<u>\$10,877,146.13</u>	<u>\$1,822,611.51</u>	<u>\$12,885,053.26</u>

Storm exp accts 583-586 and 593-596 & 903

6.5 Yrs 2005- June 2011

PPI - Inflation factor (1)	2005	2006	2007	2008	2009	2010	Jan-Jun 2011	6.5 Yr Avg	July - Dec 2011	2012
1.23		1.15	1.11	1.06	1.03	1.01	1.00		1.01	1.02
Resource Type	<u>2005</u>	<u>2006</u>	<u>2007</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>Jan-Jun 2011</u>	<u>6.5 Yr Avg</u>	<u>July - Dec 2011</u>	<u>2012</u>
34 - PURCHASING RATE-AP LOADING			\$0.00	\$61.85	\$15,015.57	\$1,433.52	\$7,643.47	\$3,716.06	3,753.22	3,828.29
35 - STORES HANDLING LOADING	\$479.74	\$4,388.62	(\$189.22)	\$1,850.72	\$3,769.60	\$91.13	\$1,680.46	\$1,857.08	1,875.66	1,913.17
40 - MATERIALS-STOCK	\$2,341.18	\$20,998.93	\$61,034.02	(\$30,431.45)	\$40,968.24	\$650.96	\$10,623.20	\$16,336.17	16,499.53	16,829.52
41 - MATERIALS-ADJUSTMENTS		\$59.90	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$9.22	9.31	9.49
80 - INDIVIDUAL EXPENSES	\$14,990.74	\$501,194.63	\$169,968.69	\$184,955.39	\$276,501.10	\$14,439.90	\$262,547.94	\$219,168.98	221,360.67	225,787.89
82 - NON-TAXABLE MEALS & ENTERTAIN		\$0.00	\$33,728.30	\$85,806.60	\$199,512.05	\$15,765.84	\$174,604.72	\$78,371.92	79,155.64	80,738.76
EC - CONTRACT SERVICES	\$1,274,783.95	\$5,835,981.88	\$9,442,163.33	\$3,137,937.59	\$6,086,958.47	\$68,015.99	\$1,589,788.41	\$4,220,866.10	4,263,074.76	4,348,336.25
ED - T&D CONSTRUCTION CONTRACTORS		\$21,039.44	\$16,522,926.57	\$4,828,780.13	\$7,015,784.97	\$955,869.59	\$8,216,527.18	\$5,778,604.29	5,836,390.33	5,953,118.14
EI - ACCOUNTING ENTRIES-OTHER		\$21,710,402.35	(\$21,128,207.89)	\$5,781,639.08	(\$5,352,200.30)	(\$22,780.85)	\$0.00	\$152,131.14	153,652.45	156,725.50
EX - PROFESSIONAL SERVICES-OTHER		\$23,159.75	\$3,219.75	\$4,993.41	\$32,188.09	\$108.05	\$2,128.18	\$10,122.65	10,223.88	10,428.35
LU - LABOR-UNION	\$744,136.74	\$4,369,911.89	\$1,965,825.95	\$4,565,641.19	\$2,916,904.23	\$807,243.51	\$2,619,509.70	\$2,767,565.11	2,795,240.76	2,851,145.58
PPI Adjusted Total	<u>\$2,036,732.35</u>	<u>\$32,487,137.39</u>	<u>\$7,070,469.50</u>	<u>\$18,561,234.51</u>	<u>\$11,235,402.02</u>	<u>\$1,840,837.64</u>	<u>\$12,885,053.26</u>	<u>\$13,248,748.72</u>	<u>\$13,381,236.21</u>	<u>\$13,648,860.93</u>

Based on Bureau of Labor Statistics Producer Price Index for Electric Power Distribution Industry, see Ameren Exhibit 46.4.

Bureau of Labor Statistics
 Producer Price Index Industry Data
 Series ID: PCU221122221122
 Industry: Electric Power Distribution

Year			June 2011	2010	2009
		Growth factor	1) PPI factor	2) PPI factor	3) PPI factor
2004	102.5 *				
2005	107.1 *	1.04	1.23	1.22	1.19
2006	115.1 *	1.07	1.15	1.13	1.11
2007	118.9 *	1.03	1.11	1.10	1.07
2008	124.8 *	1.05	1.06	1.05	1.02
2009	127.7 *	1.02	1.03	1.02	1.00
2010	130.6 *	1.02	1.01	1.00	
June 2011	131.9 **	1.01	1.00		
Dec 2011	133.2 **	1.01			
2012	134.5 **	1.02			
2013	137.2 **	1.02			
2014	140.0 **	1.02			
2015	142.8 **	1.02			

* PPI annual index

** index calculated as 2% annual growth

1) PPI factor -estimated June 2011 annual index as basis

2) PPI factor -2010 annual index as basis

3) PPI factor -2009 annual index as basis

Response to AIC's
Twentieth Set of Data Requests to Staff
AIC-Staff 20.01
Docket Nos. 11-0279 and 11-0282
Response of Staff Witness Roy Buxton
Response Date: 09/1/2011

ICC Person Responsible: Roy Buxton
Title: Engineering Program Manager
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
Phone Number: 217- 785- 5424

Request AIC-Staff 20.01

In Ms. Elsaid's rebuttal testimony (ICC Staff Ex. 27.0, lines 117-119), she observes that if the Commission decided to normalize storm expense over a six and ½ year period from 2005 to June 2011, the normalized storm cost would be approximately \$13.4 million.

- a) Please see spreadsheet entitled "Storm costs 2005-June 2011" calculating average expense from 2005 to June 2011 with certain corrections to the underlying data. Does Staff agree that average expense for this 6.5 year period is approximately \$13.65 million (see cell L35 on line 30)?
- b) Would Staff object to Ameren Illinois being allowed to recover that amount in rates for storm costs (i.e., \$13.65 million) based on a 6.5 year normalization period, if Ameren Illinois were to modify its approach on surrebuttal to propose recovery of that amount?

Response

- a) Staff agrees the average expense for this 6.5 year period is approximately \$13.65 million.

Response to AIC's
Twentieth Set of Data Requests to Staff
AIC-Staff 20.01
Docket Nos. 11-0279 and 11-0282
Response of Staff Witness Roy Buxton
Response Date: 09/1/2011

ICC Person Responsible: Roy Buxton
Title: Engineering Program Manager
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
Phone Number: 217- 785- 5424

- b) For purposes of this docket and this particular issue, Staff does not object to Ameren Illinois being allowed to recover the \$13.65 million in rates for storm costs. However, this agreement is limited to this particular docket and is not meant to bind Staff to this particular position on the length of the normalization period for storm costs or preclude Staff from arguing a different position in future rate case proceedings.