

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

**AMEREN ILLINOIS COMPANY** )  
 )  
Proposed general increase in electric ) Docket No. 11-0279  
delivery service rates. )  
 )

**AMEREN ILLINOIS COMPANY** )  
 )  
Proposed general increase in gas delivery ) Docket No. 11-0282  
service )  
rates. )

**REDACTED**

**STAFF GROUP CROSS EXHIBIT 1**

**STIPULATED DOCUMENTS AND DATA REQUEST RESPONSES**

The Staff witnesses of the Illinois Commerce Commission (“Staff”) and Ameren Illinois Company (“Ameren” or “AIC” or “Company”) have stipulated that the following documents and data request responses, attached hereto, should be entered into the evidentiary record in the instant rate case proceedings:

A RMP 1.10S (Redacted)	
B RMP 9.01 (Redacted)	
C RMP 14.01 (Redacted)	

WHEREFORE, Staff respectfully requests that the attached documents be entered into evidence in this proceeding.

September 19, 2011

Respectfully submitted,

/s/

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Commerce Commission

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**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  
Supplemental Response Date: 9/12/2011**

RMP 1.10S

Please provide the daily cash balance for AIC for each day beginning October 1, 2010.  
Please supplement this data request response monthly as the requested information becomes available until the record in these rate proceedings is marked heard and taken.

**RESPONSE**

**Prepared By: Ryan J. Martin  
Title: Assistant Treasurer and Manager, Corporate Finance  
Phone Number: (314) 554-4140**

Please see the RMP 1.10S Attach (designated as **Confidential & Proprietary**) for the requested information.

**RMP 1.10S Attach**

**is**

**CONFIDENTIAL**

**in its entirety.**

**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: 6/10/2011**

RMP 9.01

Ameren Ex. 4.0, p. 13, states, “[t]he forecasted December 31, 2011 and December 31, 2012 long-term debt balances reflect...the anticipated payoff of a \$150 million bond issue that matures in June 2011, and the issuance of \$150 million of bonds in October of 2012...” Please explain why the Company expects to wait until October 2012 to replace the \$150 million long-term debt that matures in June 2011.

**RESPONSE**

**Prepared By: Michael G. O’Bryan  
Title: Sr. Capital Markets Specialist  
Phone Number: 314-554-3503**

**PUBLIC VERSION  
CONFIDENTIAL INFORMATION REDACTED**

Since the Company has a projected cash balance of \$XXX.X million at the end of May 2011, the payoff with cash of the \$XXX million bond issue that matures June 15, 2011 is the prudent step to take. However, the projected buildup of short-term debt during 2012 warrants the issuance of the long-term debt in October 2012.

The deferral of the replacement of the \$XXX million of long-term debt until October 2012 will allow the Company to avoid interest expense related to such debt of approximately \$XX.X million plus other expense and discount accruals of \$0.XX million, based on the October 2012 projected terms.

**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: 9/12/2011**

RMP 14.01

The Company's response to ICC Staff DR RMP-9.01 (Confidential and Proprietary) states: The deferral of the replacement of the \$150 million of long-term debt until October 2012 will allow the Company to avoid interest expense related to such debt of approximately \$XX.X million plus other expense and discount accruals of \$X.XX million, based on the October 2012 projected terms. Please provide the calculations used to derive (1) the \$XX.X million of interest expense, and (2) discount accruals of \$X.XX million. In the response, please describe all underlying assumptions for those calculations.

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

**Prepared By: Ryan J. Martin**  
**Title: Assistant Treasurer and Manager, Corporate Finance**  
**Phone Number: (314) 554-4140**

**CONFIDENTIAL & PROPRIETARY.**

Total issuance amount	\$ 150,000,000
Coupon	x.xx%
Total annual interest	\$ x,xxx,xxx
Total monthly interest	\$ xxx,xxx

Discount amortization (annual)	\$ xxx,xxx
Expense amortization (annual)	\$ xxx,xxx
Total annual amortization	\$ xxx,xxx
Total monthly amortization	\$ xx,xxx

Months between issuances	xx
Total interest	\$ xx,xxx,xxx
Total amortization	\$ xxx,xxx

The assumptions underlying my calculations were that the hypothetical 2011 refinancing would have taken place one month prior to the June 15, 2011 maturity of the \$150 million 6.625% senior secured notes. The one-month period between the new issuance and the maturity date of the maturing bonds is typical in such situations. Therefore, the period between the hypothetical 2011 refinancing and the issuance date projected in the Company's D-3 Schedule (10/15/12) is 17 months.

All terms of the hypothetical 2011 refinancing were assumed to mirror the terms assumed for the October 15, 2012 new issue, as shown on the Company's D-3 Schedule.

Note that the approximately \$xx.x million of interest savings noted above is a "gross" value that considers long-term debt interest savings but does not consider incremental interest cost of approximately \$x.x million associated with additional short-term debt borrowing of approximately that will be incurred as a result of the Company's decision to defer the refinancing of the \$150 million of senior secured notes. Net interest saving is expected to total approximately \$xx.x million.