

**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.)

STAFF GROUP CROSS EXHIBIT 12

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 DAS 1.29 | K DAS 5.12 |
| B DAS 2.01 | L DAS 5.13 |
| C DAS 5.01 | M DAS 5.14 |
| D DAS 5.04 | N DAS 5.15 |
| E DAS 5.05 | |
| F DAS 5.07 | |
| G DAS 5.08 | |
| H DAS 5.09 | |
| I DAS 5.10 | |
| J DAS 5.11 | |

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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JAMES V. OLIVERO
JOHN L. SAGONE

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Ameren Illinois Company
d/b/a Ameren Illinois
Response to ICC Staff Data Requests
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DAS 1.29

For each rate zone, please provide the Peak Design Day for each heating season from 2006 – 2011. Please also list and explain all criteria used by the utility as a basis of each of the test year values in AIC's confidential and proprietary 285.315c filing and provide all associated workpapers.

RESPONSE

Prepared By: Vonda K. Seckler
Title: Managing Executive, Gas Supply
Phone Number: 314-206-1181

See DAS 1.29 Attach designated **CONFIDENTIAL and PROPRIETARY**.

Ameren Illinois develops an annual gas sales forecast and an annual budget forecast of upstream gas supply, transportation, and storage costs. The gas sales forecast is based upon the current number of customers in each sales classification, historical trends, and forecasted growth. The annual gas sales forecast is for a six-year period while the annual budget forecast is for a five-year period.

Peak day demand requirements are developed in several ways. Demand studies are performed to model the relationship between temperature, load, season, day of week, and growth. Historical temperature data are also analyzed to determine the peak design day temperature.

Ameren Illinois plans its portfolio of gas supply, pipeline capacity, and storage capacity to meet firm sales customer demand on a peak design day. The primary driver for the portfolio is the peak design day which determines what level of firm pipeline capacity and on-system deliverability resources are required to serve the firm sales demand. Deliverability in excess of the peak design day is referred to as reserve margin, which represents capacity resources used to meet load growth during the term of the capacity agreements and allows for statistical error in calculating the peak design day.

Once the peak design day is established, a portfolio of pipeline capacity and on-system resources can be configured to meet the peak design day. Several constraints govern the configuration of the portfolio, mainly with respect to the physical connection of the distribution systems to the upstream interstate pipelines, the amount of firm capacity available on the pipelines, the type of firm services available, the competitive market for capacity on that pipeline and the accessibility to the various gas production regions.

Then on-system resources, interstate pipeline capacity, and leased storage resources are configured, and firm gas supply contract levels are selected to maintain full pipeline capacity deliverability during the core winter months of December through February when peak demand

periods can occur. The firm gas supply agreements are usually designed to ramp into and out of the peak season.

Matching natural gas supply with demand requires an in depth analysis of many different but inter-related variables: interstate pipeline capacity, leased and Company-owned storage, and firm\swing supply. In total, the bundled supply portfolio needs to provide operational flexibility, system reliability, and peak period deliverability at the lowest reasonable cost.

**Ameren Illinois Company
d/b/a Ameren Illinois
Response to ICC Staff Data Requests
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DAS 2.01

With regard to AIC witness Mr. Eggers statement that “Nicor’s current tariff has a similar mechanism for their transportation customers and the tariffs of the legacy Ameren Illinois utilities had similar cashout provisions in the past,” (Ameren Ex. 14.0G, p. 21)

- a) Describe the similar mechanism from Nicor’s current tariff.
- b) Does the Nicor tariff apply to cashouts, either daily or monthly?
- c) Does the Nicor tariff mechanism apply after the storage withdrawal? Is that storage withdrawal greater than the allowance for AIC transportation customers?
- d) Does Nicor ever buy excess transportation customers’ gas at the lower of the PGA or market price?
- e) Describe the “similar cashout provisions” of the legacy Ameren Illinois utilities.

RESPONSE

**Prepared By: Timothy L. Eggers
Title: Managing Executive, Gas Supply
Phone Number: 314-554-3638**

- a) Nicor's current tariff charges the higher of Gas Costs or Market for Authorized Use gas and Unauthorized Use gas. Such provisions are designed to prevent Transportation customers or their agents from intentionally under nominating deliveries in order to purchase from the utility when market prices exceed the Purchased Gas Adjustment. If a utility's tariff provides for the sale of Transportation customer gas to the utility, a similar provision to pay the lower of the market price or the Purchased Gas Adjustment prevents the utilities sales customers from having to purchase gas above their Purchase Gas Adjustment price.
- b) The Nicor tariff applies to both Authorized Use and Unauthorized Use gas which is supplied to the customer if their daily usage exceeds their deliveries and available storage withdrawals, which mirrors the application of the AIC cashout for Transportation customers whose usage exceeds their deliveries and banking allowance. Nicor's provision applies to rate classes that are balanced daily.
- c) The cashout provision of the Nicor tariff applies after the storage withdrawal. Nicor charges the higher of Gas Costs or Market for Authorized use gas, which, if requested by the customer, applies prior to the storage withdrawal. From November 1 through March 31 of the following year, the Nicor tariff mechanism provides greater storage withdrawal than the allowance for AIC transportation customers. AIC monthly balanced transportation customers are afforded a greater allowance for bank withdrawals from April 1 through October 31 of each year.
- d) No. Nicor's purchase of customer owned gas is priced at 50% of the lowest Gas Daily Price for the Chicago Citygates applied to over-deliveries during imposed Operational Flow Orders.

- e) The Rider T tariff of Central Illinois Light Company applied "the lower of the sum of the CGC and NCGC for the billing period or the lowest daily Chicago Citygate Price taken from the NGI Daily Gas Price Index for the billing period" to the quantity of gas in excess of the Customer's Bank Limit. For Company-supplied gas the customer was charged the higher of the Purchased Price Index, which was the simple average of the Chicago Citygate Price(s) for the billing period, or the Adjustment for the Cost of Purchased Gas. If a discounted NCGC was in effect, only the Gas Supply Charges of the Adjustment for the Cost of Purchased Gas was used. Illinois Power used a similar provision when pricing excess use on a critical day, charging the customer the higher of market gas or system gas coupled with the fixed penalty per therm.

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DAS 5.01

Regarding Ameren's storage portfolio.

- a) In the past 10 years has Ameren changed its storage portfolios?
- b) If so, please provide the date and amount of the increase along with the name of the pipeline involved.
- c) Ten days of bank for transportation customers constitutes what percentage of the total storage portfolio?

RESPONSE

**Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638**

- a) Yes.
- b) Please see DAS 5.01 Attach (designated as HIGHLY CONFIDENTIAL) for the storage contract history for Ameren Illinois's legacy companies. Please note the data is 2003 to present for AmerenCILCO and 2004 to present for AmerenIP. AmerenCIPS data covers the specified time frame.
- c) Ten days of bank for transportation customers under contract on November 1, 2010 was 13.3% of the total Ameren Illinois storage portfolio.

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DAS 5.04

With regard to Mr. Eggers' surrebuttal testimony claim that "To meet the greater obligations caused by these provisions, AIC will have to acquire more leased storage assets in order to provide this level of service" (Ameren Ex. 51.0, p. 8), please provide the following information.

- a) What are Mr. Eggers' assumptions regarding transportation customers' subscriptions relative to the BSL of 5.2 Bcf?
- b) If the Banking Service Limit ("BSL") level is fixed as Ameren recommends but CD withdrawal is expanded as Staff recommends, at what level of subscription will Ameren have to go out and expand its portfolio as indicated?
- c) If the CD withdrawal remains at its current level as Ameren recommends but BSL level is expanded as Staff recommends, at what level of subscription will Ameren have to go out and expand its portfolio as indicated?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) Ameren's obligations are at their highest with Staff's proposed BSL of 8.22 Bcf and CD rights of 2.2% of transportation customer banks. The need for additional assets was predicated on a subscription level that grants CD rights greater than the 109,290 Dth already incorporated into Ameren's Peak Design Day. Mr. Eggers assumes that when storage economics are favorable Ameren's BSL, whether set at 5.48 Bcf as proposed by the Company or at 8.22 Bcf as proposed by Mr. Sackett, will be fully subscribed.
- b) CD rights under Mr. Sackett's proposal are tied to bank size. Under this scenario, the maximum aggregate CD rights afforded to transportation customers would be 2.2% of the 5.48 Bcf BSL. When the amount of bank subscriptions times the 2.2% exceeds Ameren's current commitment of 109,290 Dth, Ameren could be expected to need additional leased assets. A subscription of 4.97 Bcf would match Ameren's current commitments. Subscription levels above 4.97 Bcf would generate the need to secure additional leased assets.

- c) Since CD rights do not change under this scenario, no level of subscription would require additional leased pipeline capacity or pipeline storage assets. The expansion of the BSL, since Mr. Sackett accepts that sales customer gas can be expected to make up all injection and withdrawal shortfalls, is objectionable to Ameren Illinois from a customer subsidy standpoint.

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DAS 5.05

With regard to Mr. Eggers' surrebuttal testimony that he is familiar with the gas operational principle of displacement (Ameren Ex. 51.0, pp. 8-9), please provide the following information.

- a) Does transportation customers' gas that is accounted as withdrawn from their banks, come from on-system assets, off-system assets or total system assets? If other than "total system assets," please explain fully.
- b) Does transportation customers' gas that is accounted as stored in their banks for the winter, stored in on-system assets, off-system assets or total system assets? If other than "total system assets," please explain fully.
- c) Does sales customers' gas that is accounted as withdrawn from storage come from on-system assets, off-system assets or total system assets?
- d) Is transportation customers' gas that is accounted as stored for the winter, stored in on-system assets, off-system assets or total system assets? If other than "total system assets," please explain fully.
- e) Does Ameren use gas that is accounted as sales gas or does it use system gas, including transportation gas, to cycle its on-system storage field? If other than system gas, please explain fully.
- f) Does gas withdrawn from on-system storage fields become sales customers' gas when it is withdrawn on those days when transportation customers' as a group, are injecting? If no, then please explain fully.

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) All transportation customer under-deliveries are treated as in imbalance. To settle the imbalance, sales customer's gas is used. The gas is sourced from total system assets, but primarily, leased and on-system storage is used.
- b) Transportation customer over-deliveries are treated as an imbalance. To settle the imbalance, adjustments to sales customer's activity are made. These adjustments use total system assets, but primarily, leased and on-system storage.
- c) Sales customer's withdrawals come from on-system storage and leased storage.

- d) Transportation customers positive variances between gas volumes brought into Ameren's system and the usage for that Transportation customer for a given time period (daily or monthly) are treated as an imbalance and are accommodated by using total system assets.
- e) Mr. Eggers must first clarify that there is only sales customer gas and transportation customer gas in its system. The term "system gas" is sometimes used to describe the blended supplies of sales and transportation customers. I believe the intent of the question shares that definition.

Ameren Illinois only uses gas that is accounted for as sales customer gas to cycle its on-system storage fields. The treatment of transportation customers under and over-deliveries are treated as imbalances and not treated as stored gas.

- f) All gas in on-system fields is accounted for as sales customer gas. Accordingly, all withdrawals from on-system fields are sales customer gas. This is true regardless of the net activity of the transportation customer group.

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DAS 5.07

With regard to Mr. Eggers' surrebuttal testimony that sales customers will be harmed because transportation customers will have the option of subscribing to banks when storage is valuable and not subscribing to banks when storage is not valuable (Ameren Ex. 51.0, p. 10), please provide the following information.

- a) Under Ameren's proposal, would transportation customers have the option to select their bank level?
- b) Does Mr. Eggers agree that the issue is not one of fairness but rather the degree of the "potential for economic harm" between the Ameren proposal and the Staff proposal?
- c) Regarding the "option to fill or empty," do transportation customers currently have the option to fill or empty their banks?
- d) Under Ameren's proposal for a 5.48 Bcf BSL, will transportation customers have the option to fill or empty their banks?
- e) Under Staff's proposal are transportation customers bank levels linked to peak day withdrawal rights. Do you agree that the purpose of this proposal is to encourage transportation customers to fill their banks?
- f) Given Ameren's concern for fairness to sales customers resulting from the "option not to fill or empty", why has Ameren not accepted the fall target that would require Ameren's transportation customers to fill their banks?
- g) Given Ameren's concern for fairness to sales customers resulting from the "option not to fill or empty", does Ameren propose an alternative to Staff's proposal that would have sufficient incentives to fill banks in the winter or a cashout such as occurs in Peoples Gas and North Shore? Please explain.

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive
Phone Number: Gas Supply

- a) Yes.
- b) Regarding this part of the Staff proposal the issue is both the 'potential for economic harm' and the fairness of the Nicor method.
- c) Yes.
- d) Yes.

- e) No. Staff's proposal links CD withdrawal rights to customer bank levels, not peak day rights. The rights of transportation customers on the peak day each winter will be 20% of a daily balanced customer's DCN, unless Ameren would declare a CD on that day. As Ameren's load nears 'Peak Design Day' Ameren would be more likely to declare a CD than on a historically average winter season peak day. If Staff states the purpose of the proposal is to incent customers to fill their banks, Mr. Eggers has no reason to believe otherwise. However, Mr. Eggers believes the effectiveness of the proposal in meeting this purpose is very limited. The proposal only incents customers who desire significant CD rights to fill their banks. Many customers with high load factors, adequate transportation assets, or back-up sources of supply may not need significant CD rights and may not elect to fill. Furthermore, since filling a 15 day customer bank to 60% bank level will provide approximately the same rights as Ameren's current tariff, a customer may decide that level of fill is adequate. Finally, since Ameren uses CD declarations as a last resort, not declaring a CD in well over 10 years, transportation customers may elect to "roll the dice" with respect to CD rights and not fill during injection seasons with poor storage economics.
- f) Ameren has not accepted the fall target proposed by Staff as it has an inadequate penalty for non-compliance. Ameren believes it will inadequately incentivize injections. Furthermore, the proposal has no accompanying withdrawal requirement. If transportation customers do not withdraw, they will have reduced fill requirements in the next season. And during these seasons, sales customer's gas will be used for the replacement withdrawals and subsequent replacement injections.
- g) If Staff's proposal with respect to BSL is adopted, Ameren might well be forced to propose tariffs either in the next case, or in a 45 day filing, new provisions relating to monthly injection and withdrawal targets with adequate penalties to encourage compliance. To date, Ameren has not undertaken the analysis required to determine provisions to provide appropriate flexibility to transportations customers that protects the integrity of its storage fields and minimizes the potential economic harm to sales customers.

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DAS 5.08

With regard to Mr. Eggers' surrebuttal testimony about the marginal storage capacity between Ameren's and Staff's proposals (Ameren Ex. 51.0, pp. 10-11), please provide the following information.

- a) Under Ameren's proposal, who would use the marginal 2.74 Bcf that separates Staff's BSL from Ameren BSL?
- b) Under Ameren's proposal, who would pay for the capacity of the marginal 2.74 Bcf that separates Staff's BSL from Ameren BSL?
- c) Under Ameren's proposal, how much will sales customers lose on this same 2.74 Bcf based on the negative value of storage?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) The sales customers.
- b) The sales customers.
- c) Using the Nymex 2012 summer strip price of \$0.442 per therm and the 2012-13 winter strip price of \$0.494 per therm. The \$0.052 spread will be recovered from the \$0.126 cost of storage. The cost of the 2.74 Bcf is \$3,452,400. The cost savings by storing gas is \$1,424,000. For a net exposure to filling and emptying this storage of \$2,027,600. Of course, owning that storage provides other benefits, such as better utilization of year round pipeline capacity and the savings afforded by avoiding the costs of the winter pipeline capacity that storage provides approximately 60,280 Dth of peak day deliverability, which if replaced with pipeline capacity would cost significantly more than loss calculated above. Furthermore, in times of significant national or regional supply issues, on-system storage is the most reliable supply for the Ameren system.

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DAS 5.09

With regard to Mr. Eggers' surrebuttal testimony that "Under these circumstances, transportation customers will elect to hold less storage" (Ameren Ex. 51.0, p. 11), please provide the following information.

- a) Has the price of natural gas become more or less volatile in the last three years?
- b) "Less storage" appears to be a relative term. What is this "less" relative to? The current amount of 10 days? The full amount that they would take under Ameren's BSL of 10 days? Or the full amount of Mr. Sackett's proposal of 15 days?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) The price has generally become less volatile.
- b) It means less than they might otherwise hold, regardless of whether the bank limit is set at 10 or 15 days.

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DAS 5.10

With regard to Mr. Eggers' surrebuttal testimony that "Transportation customers currently pay just 4.55% of Company storage costs, but have rights to 20% of the capacity. This is clearly greater proportional access than what they pay for." (Ameren Ex. 51.0, p. 14), please provide the following information.

- a) Is this reference to 20%, as a percentage of peak day withdrawal or on-system annual capacity?
- b) What is the peak day percentage of transportation customers' bank withdrawals relative to the total peak day?
- c) Did Ameren propose in the last rate case to recover storage costs based on the peak day proportion rather than annual capacity? If yes, then did Ameren propose to recover Storage costs based on an amount that was less than the annual capacity?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) It specifically referred to the capacity provided by Ameren's current tariff of 10 times the aggregate transportation customer MDCQ. Which is 5.48 Bcf or around 21% of Ameren's on-system storage capacity.
- b) The Company plans for a maximum Peak Design Day delivery obligation to transportation customers of 109,290 Dth. Sales customer peak is approximately 1,128,687 Dth. The result is 9.6%. GDS-5 customers (seasonals) are not included in the 109,290 Dth as a matter of practicality as they are not reasonably expected to be operating during Peak Design Day conditions
- c) In the 2009 rate case, Ameren proposed to allocate on-system storage costs to transportation customers based on transportation customers' rights to withdraw 20% of their DCN from their banks on a Critical Day. In order to be conservative in the allocation of costs, Ameren proposed using the 20% withdrawal limit for all transportation customers even though the small transportation customers being served under GDS-2 and GDS-3 had rights to withdraw 50% of their MDCQ on a Critical Day. The total 2008 peak day volume for transportation customers on

each of the legacy utilities (AmerenCIPS, AmerenCILCO and AmerenIP) less GDS-7 customers and other special contract customers were used as an approximation of the DCNs for those days which resulted in a 7.21% allocation of on-system storage costs to transportation customers.

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DAS 5.11

With regard to Mr. Eggers' surrebuttal testimony that "The Company must plan for the full utilization of the rights it affords to customers and retain assets accordingly" (Ameren Ex. 51.0, p. 19), please provide the following information.

- a) In its peak design day, does Ameren plan for the "full utilization of rights" for each sales customer that has an MDCQ, based on its MDCQ? If yes, please explain fully.
- b) Do sales customers with an MDCQ have the right to use their full MDCQ on a CD?
- c) Do sales customers with an MDCQ have the right to use more than their full MDCQ on a CD?
- d) Does Ameren plan for the full utilization of the rights it affords for each transportation customer based on its MDCQ? If yes, please explain fully.
- e) What would the effect be on base rates if Ameren over-estimated the amount of peak day capacity required for sales customers?
- f) What would the effect be on base rates if Ameren over-estimated the amount of peak day capacity required for transportation customers?
- g) What would the effect be on costs flowed through the PGA if Ameren over-estimated the amount of peak day capacity required for sales customers?
- h) What would the effect be on costs flowed through the PGA if Ameren over-estimated the amount of peak day capacity required for transportation customers?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) No. Ameren's Peak Design Day calculation for sales customers is based on analysis of load and temperature data.
- b) Sales customers with an MDCQ have the right to use any amount of gas on a Critical Day.
- c) See b.
- d) It plans for the full utilization of 20% of MDCQ of daily balanced customers and 50% of MDCQ for monthly balanced customers, but excludes GDS-5 customer MDCQs from the calculation.

- e) There would be no affect, assuming pipeline assets would be subject to reduction first.
- f) There would be no affect, assuming pipeline assets would be subject to reduction first.
- g) The costs would increase the PGA.
- h) The costs would increase the PGA.

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DAS 5.12

With regard to Mr. Eggers' surrebuttal testimony that "The total cost for the services required to cover daily balanced customer imbalances was \$2.3 million annually, far in excess of the \$583,000 average in premiums paid by transportation customers, through the cashout mechanism. AIC's cashout proposal is designed to bring cashout premiums more in line with balancing costs" (Ameren Ex. 51.0, p. 21), please provide the following information.

- a) Is Ameren Exhibit 51.1 based on an assumption that Ameren bought a new asset and used it for transportation customers?
- b) If Ameren were to incur \$2.3 million in balancing costs to support the imbalances of transportation customers by providing them with the asset mentioned, would other customers benefit from this asset? If no, please explain fully.
- c) Does Ameren incur \$2.3 million in balancing costs to support the imbalances of transportation customers? If yes, please explain fully.
- d) What balancing costs does Ameren actually incur? Please explain fully.
- e) Does Ameren ever use any asset exclusively for one group of customers? If yes, please identify the asset and explain fully.
- f) Do transportation customers use assets paid for by sales customers?
- g) Do sales customers from time to time use assets or portions of assets that are paid for by transportation customers?
- h) Do transportation customers pay for off-system storage assets indirectly through cashout premiums? If no, then what do the cashout revenues credited to the PGA pay for?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) The assumption is only that if Ameren had a stand-alone asset, sized to serve exclusively the transportation customer imbalances.
- b) Since we use all assets to support the system, other customers may benefit from the asset.

- c) The \$2.3 million calculation is the service cost on a stand-alone basis. It is only a proxy for the actual cost. The actual cost to manage transportation customer cashout imbalances is very difficult to calculate, since all assets are used to settle the imbalances. Ameren has not analyzed the exact amount of leased storage that we hold for the sole purpose of managing cashout imbalances and the assumptions required may be less valid than using a proxy calculation.
- d) The actual costs the Company incurs are the commodity charges associated with changes to injections and withdrawals, the related fuel charges and the reservation fees if they could be associated with a specific amount of leased storage service to accommodate cashout imbalances. Furthermore, to the extent that on-system storage is used to settle these imbalances, the capacity used could possibly be allocated a cost to transportation customer balancing.
- e) Limiting this question to the assets pertinent to my testimony, no. However, from an accounting standpoint, storage is filled with only sales customer gas.
- f) Transportation customer imbalances are often settled with adjustment to leased pipeline storage, Point Operator accounts, park and load agreements, etc. All of these asset costs are fully allocated to the sales customers.
- g) Sales customers and transportation customers use the same distribution network and each pays an allocation of those costs to that extent they share those assets.
- h) Yes. Those premiums are credited to PGA costs, some of which are leased storage assets.

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DAS 5.13

With regard to Mr. Eggers' surrebuttal testimony that "The total cost for the services required to cover daily balanced customer imbalances was \$2.3 million annually, far in excess of the \$583,000 average in premiums paid by transportation customers, through the cashout mechanism. AIC's cashout proposal is designed to bring cashout premiums more in line with balancing costs" (Ameren Ex. 51.0, p. 21), please provide the following information.

- a) Does Ameren ever buy gas at its city gate? If no, please explain fully. If yes, does Ameren pay the FOM price, the daily price or the PGA or some other price for these purchases?
- b) Please provide the copies of all receipts for gas bought at the city gate for which Ameren paid the PGA.
- c) Would Mr. Eggers agree that Ameren can purchase gas at its city gate during the gas day in which transportation customers under-deliver? If not, please explain.
- d) Would Mr. Eggers agree that Ameren can purchase gas at its city gate on the next gas day after transportation customers under-deliver? If not, please explain.
- e) Would Mr. Eggers agree that the closing spot price from one gas day and the opening price on the next gas day are strongly correlated?
- f) Would Mr. Eggers agree that sales customers' usage varies during the gas day from what is estimated in planning the day ahead? If yes, does this variation occur in both directions?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

- a) Yes. These purchases are typically daily spot purchases or daily calls on firm swing gas and are priced on a daily citygate index.
- b) There are none.
- c) No. Ameren does not know the net effect of transportation customer imbalances until days after the day of flow. Ameren buys citygate gas to serve load based on forecasted demand. If such a purchase happened to occur on a day that with transportation under-deliveries it would be by chance.

- d) Possibly. Ameren can possibly gather the transportation customer meter readings and calculate the net effect in time to purchase citygate supplies on the next gas day.
- e) Yes. That is typically the case. However, in times of severe weather or other significant events the prior day close and next day open can have a wide difference.
- f) Yes, and yes.

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

DAS 5.14

Do Ameren's contracts with the pipelines allow gas to be delivered (1) at any delivery point in a rate zone; (2) at any delivery point across Ameren; or (3) is Ameren required to balance point-by-point?

RESPONSE

Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638

With some exceptions, Ameren's contracts permit delivery at any point in the rate zone. Some have secondary delivery points for other rate zones than the primary rate zone listed on the contract, yet other contracts cannot deliver outside the rate zone. Ameren balances the vast majority of its points through Central Delivery Points. Some pipelines only have a single point and as such, a Central Delivery Point is not used. These are usually rate zone specific.

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Response to ICC Staff Data Requests
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DAS 5.15

Would Ameren be willing to address net transportation customer imbalances by have a floating basis differential to the Chicago City gate price that could change monthly with the objective of minimizing transportation customer imbalances? Would such a proposal fix the problem of under-delivery?

RESPONSE

**Prepared By: Timothy L. Eggers
Title: Managing Executive Gas Supply
Phone Number: 314-554-3638**

Ameren would be willing to discuss alternatives to its cashout mechanism with the goal of minimizing imbalances.