

*Cross*

**Ameren Illinois Company  
Response to IIEC Data Requests  
Docket Nos. 11-0279 and 11-0282 (Cons.)  
Proposed General Increase in Electric and Gas Delivery Service Rates  
Data Request Response Date: 5/27/2011**

IIEC 5.01

Does Ameren agree that it routinely extends its primary and/or secondary distribution networks – which consist of poles, overhead conductor, and/or underground cable – to serve residential, commercial and/or industrial customers? a) If not, please explain why not.

**RESPONSE**

**Prepared By: Ryan Schonhoff  
Title: Regulatory Consultant  
Phone Number: 314 554 4190**

Yes.

**OFFICIAL FILE**

ILL. C. C. DOCKET NO. 11-0279/0282  
IIEC Cross Exhibit No. 3  
Witness Schonhoff  
Date 9-15-11 Reporter CB

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IIEC 5.03

Does Ameren incur distribution plant costs and/or O&M expenses, (i.e., costs and expenses recorded in FERC Accounts 364, 365, 366, 367, 583, 584, 593 and/or 594) in complying with the NESC? a) If not, please explain why not.

**RESPONSE**

**Prepared By: Ryan Schonhoff**  
**Title: Regulatory Consultant**  
**Phone Number: 314 554 4190**

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: 7/18/2011**

IIEC 14.07

How many of Ameren's primary or higher voltage customers (i.e., DS-3 Primary, DS-3 High Voltage, DS-3 100+ kV, DS-4 Primary, DS-4 High Voltage, and DS-4 100+ kV), in each rate zone, receive their service from Ameren via connections to single-phase supply circuits? a) How many receive their service from Ameren via connections to dual-phase (i.e., two-phase) supply circuits?

**RESPONSE**

**Prepared By: Ryan K. Schonhoff**  
**Title: Regulatory Consultant**  
**Phone Number: 314-554-4190**

The breakdown by rate zone of customers receiving service via single-phase is as follows: Rate Zone I-33, Rate Zone II-1, Rate Zone III-6, Total AIC-40

The breakdown by rate zone of customers receiving service via dual-phase is as follows: Rate Zone I-4, Rate Zone II-0, Rate Zone III-2, Total AIC-6

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IIEC 16.02

At pages 14 and 15 of his rebuttal testimony (Ameren Ex. 32.0), Ameren witness Mr. Schonhoff states: I do not disagree with the fact that distribution lines must be built to standards in compliance with NESC; however, it is unclear to me that the costs related to compliance with NESC are entirely customer related. (lines 243-245, emphasis added). Please answer the following questions as they pertain to this statement by Mr. Schonhoff: A) Does Mr. Schonhoff agree that within Ameren's ECOS studies, costs are generally classified as being demand-related, customer-related or a combination of these two? If no, please explain why not. B) Please provide any studies or analyses that Mr. Schonhoff has performed, or is aware of, that show the NESC minimum requirements are based on the electrical capacity of the circuit wire, or the electrical demand served by the wire. If Mr. Schonhoff is not aware of such studies or analyses, please so state. C) Does Mr. Schonhoff agree that Ameren must comply with the NESC requirements regardless of the electrical demand of the customer or customers being served? If no, please explain why not.

**RESPONSE**

**Subparts a) & c):  
Prepared By: Ryan K. Schonhoff  
Title: Regulatory Consultant  
Phone Number: 314-554-4190**

**Prepared By: Robert J. Zuege  
Title: Supervising Engineer  
Phone Number: 217 424 7075**

- a) Yes. Costs are classified as either customer or demand related within Ameren Illinois's ECOSS.
- b) I am not aware of such studies. Distribution lines built to NESC minimum electrical requirements are capable of serving all of the coincident customer electric demand on a given circuit or portion of a circuit.
- c) Yes. However, as stated above, the minimum NESC requirements as defined by Mr. Stowe are capable of serving all or a portion of customer demand.

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IIEC 16.03

At page 16 of his rebuttal testimony (Ameren Ex. 32.0), Mr. Schonhoff states: If the minimum system is capable of carrying the full demand requirements of the typical residential customer, and already allocated, then the remaining demand related costs of distribution lines allocated to the residential class should be very little, if any... Customers with small demands such as DS-1, DS-2, and DS-5 should pay little if any of this remaining demand related component, since the NESC based minimum system is sufficient to deliver all of the average customer's electrical needs... (lines 279-281 and 283-285). Please answer the following questions as they pertain to this statement by Mr. Schonhoff: A) Does Ameren install single distribution circuits that serve multiple customers? If no, please explain why not. B) Does Ameren construct segments of its primary distribution system to exceed (in terms of the supply line conductor size) the minimum requirements of the NESC? i) If no, please explain why not. ii) If yes, what percentage of Ameren's primary distribution system consists of supply conductors that are larger than the minimum size required by the NESC? Please provide workpapers supporting your answer. C) Does Ameren construct segments of its secondary distribution system to exceed (in terms of the supply line conductor size) the minimum requirements of the NESC? i) If no, please explain why not. ii) If yes, what percentage of Ameren's secondary distribution system consists of supply conductors that are larger than the minimum size required by the NESC? Please provide workpapers supporting your answer. D) Does Ameren construct residential customer services (i.e., service drops) to exceed (in terms of the service conductor size) the minimum requirements of the NESC? i) If no, please explain why not. ii) If yes, what percentage of Ameren's services account consists of service conductors that are larger than the minimum size required by the NESC? Please provide workpapers supporting your answer.

**RESPONSE**

**Prepared By: Robert J. Zuege  
Title: Supervising Engineer  
Phone Number: 217 424 7075**

- a) Yes.
- b) Yes. Due to standardization of conductor types and sizes, the ampacity of the conductors will exceed the actual current flow on the conductors on any portion of the circuit based on maximum conductor loading criteria. Failure to oversize

conductors to accommodate current and anticipated short term load growth would negatively impact reliability and quality customer service. The analysis requested has not been completed because it would require extensive review of each circuit operated by each of the three legacy companies, represented by RZ I, II, and III.

- c) Yes. Due to standardization of conductor types and sizes, the ampacity of the conductors will exceed the actual current flow on the conductors on any portion of the circuit based on maximum conductor loading criteria. Failure to oversize conductors to accommodate current and anticipated short term load growth would negatively impact reliability and quality customer service. The analysis requested has not been completed because it would require extensive review of each circuit operated by each of the three legacy companies, represented by RZ I, II, and III.
- d) Yes. Due to standardization of conductor types and sizes, the ampacity of the conductors will exceed the actual current flow on the conductors on any portion of the circuit based on maximum conductor loading criteria. Failure to oversize conductors to accommodate current and anticipated short term load growth would negatively impact reliability and quality customer service. The analysis requested has not been completed because it would require extensive review of each circuit operated by each of the three legacy companies, represented by RZ I, II, and III.

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IIEC 16.06

In footnote number 2 at the bottom of page 21 of Mr. Schonhoff's rebuttal testimony (Ameren Ex. 32.0), Mr. Schonhoff states: Under Ameren Illinois initially filed AIC ECOSS, the secondary customers (DS1, DS2 and DS5) are allocated \$4.1 billion out of \$5 billion of electric plant in service, or 82%. Please answer the following questions as they pertain to this statement by Mr. Schonhoff: A) By including the information in the footnote, is Mr. Schonhoff suggesting that the fact that a large percentage of costs of electric plant in service is allocated to secondary customers determinative of whether the allocation is accurate? If yes, please provide the basis for the answer, including all analyses conducted by Mr. Schonhoff or scholarly work reviewed by Mr. Schonhoff in reaching this conclusion. B) Does Mr. Schonhoff agree that under Ameren's initially filed AIC ECOS study, the secondary customers in the DS-1, DS-2 and DS-5 classes represent 1,226,551 out of 1,231,674 total customers, or 99.6%? i) If not, what portion of Ameren's Illinois customer base is represented by the secondary voltage customers in the DS-1, DS-2 and DS-5 classes?

**RESPONSE**

**Prepared By: Ryan Schonhoff  
Title: Regulatory Consultant  
Phone Number: 314-554-4190**

- A) No. This is for informational purposes only.
- B) Yes.