

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Ameren Illinois Company d/b/a Ameren Illinois	)	
	)	ICC Docket No. 11-0279
Proposed General Increase in Electric Delivery	)	
Service Rates	)	
	)	consolidated with
Ameren Illinois Company d/b/a Ameren Illinois	)	
	)	ICC Docket No. 11-0282
Proposed General Increase in Natural Gas Rates.	)	

**BRIEF ON EXCEPTIONS**

On behalf of

**RETAIL GAS SUPPLIERS**

Consisting of

**Interstate Gas Supply of Illinois, Inc.  
Dominion Retail, Inc.**

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**December 8, 2011**

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**BRIEF ON EXCEPTIONS OF THE RETAIL GAS SUPPLIERS**

The Retail Gas Suppliers (“RGS”), consisting of Interstate Gas Supply of Illinois, Inc. (“IGS”) and Dominion Retail, Inc. (“Dominion”), by and through its attorneys, DLA Piper LLP (US), pursuant to Section 200.830 of the Rules of Practice of the Illinois Commerce Commission (“Commission”) (83 Ill. Admin. Code 200.830), respectfully submits its Brief on Exceptions in the instant proceeding addressing the proposed general increase in gas rates of Ameren Illinois Company d/b/a Ameren Illinois (“Ameren”).

**I.**

**INTRODUCTION**

The Proposed Order properly and accurately acknowledges the record evidence and arguments relating to establishment of a mass market competitive natural gas program in Ameren’s service territory, and sets forth a workshop process that will advance the development of that program in an open, orderly manner. RGS applauds the Proposed Order’s findings and recommended action for development of a mass market competitive program for the only customer group among major energy utilities in Illinois that lacks access to such a choice program.

The Proposed Order provides well-reasoned explanation for the need to implement a process toward competition; the Proposed Order similarly considers the arguments made against development of such a competitive program and properly rejects those arguments as unpersuasive. (*See, e.g.*, Proposed Order at 265-266.) The Proposed Order, as written, implements a process that balances the need for thorough discussion of program design, implementation, and operational issues with concrete steps toward actual implementation of the program. (*See* Proposed Order at 266-267.) Furthermore, by requiring Ameren to present a tariff after the conclusion of the workshops, the Commission will be guaranteed an opportunity to review and approve a mass market retail natural gas program that resulted from an open, informal workshop process allowing all relevant issues to be raised and vetted. (*See* Proposed Order at 266-267.)

Because the Proposed Order creates a well-balanced framework within which other interested stakeholders will work with Ameren, Staff, and RGS to develop a mass market retail natural gas program, RGS does not have any substantive exceptions to the Proposed Order's discussion of competitive issues. However, to ensure that the Proposed Order clearly reflects the Proposed Order's mandate, RGS offers clarifying language for inclusion in the ordering paragraphs.

## **XI.**

### **PROPOSED SMALL VOLUME TRANSPORTATION PROGRAM**

RGS has no substantive Exceptions to the Proposed Order. However, RGS respectfully suggests that the Commission add a numbered and ordering paragraph to memorialize the Commission's mandate regarding the mass market retail natural gas program. To that end, RGS proposes the following additional numbered paragraph, to be inserted in between the numbered paragraphs numbered (31) and (32) in the Proposed Order:

**(32) Staff is directed to initiate a workshop process within 60 days of this Order, which shall be open to all interested stakeholders, last no more than six months, and cover the topics listed in Section XI.F above. Not more than 45 days after the conclusion of the workshop process, Ameren shall file a SVT program tariff; and**

RGS also respectfully proposes the following additional ordering paragraphs, to be inserted as the first full paragraph on page 273 of the Proposed Order:

**IT IS FURTHER ORDERED that Staff shall initiate a workshop process within 60 days of this Order, which shall be open to all interested stakeholders, last no more than six months, and cover the topics listed in Section XI.F above.**

**IT IS FURTHER ORDERED Ameren is directed to file a SVT program tariff not more than 45 days after the conclusion of the workshop process.**

## **XI.**

### **CONCLUSION**

RGS fully supports the Proposed Order's conclusions and mandates regarding development of a mass market natural gas choice program, but respectfully requests that the Commission clarify the ordering paragraphs.

WHEREFORE, RGS respectfully requests that the Commission:

1. Enter an Order consistent with the Proposed Order on the issue of the mass market retail natural gas program;
2. Add the language proposed by RGS to the numbered and ordering paragraphs;
3. Grant any additional relief that the Commission determines to be in the interests of justice.

Respectfully submitted,

**THE RETAIL GAS SUPPLIERS**

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