

**ILLINOIS COMMERCE COMMISSION**

**DOCKET No. 12-\_\_\_\_\_**

**DIRECT TESTIMONY**

**OF**

**LEONARD M. JONES**

**Submitted on Behalf Of**

**AMEREN ILLINOIS COMPANY**

**d/b/a Ameren Illinois**

**January 3, 2012**

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7   **I.     INTRODUCTION**

8       **A.     Witness Identification**

9       **Q.     Please state your name and business address.**

10      A.     My name is Leonard M. Jones. My business address is 1901 Chouteau Ave, P.O.  
11      Box 66149, St. Louis, MO 63103.

12      **Q.     By whom are you employed and in what capacity?**

13      A.     I am a Manager of Rates and Analysis providing regulatory services for Ameren  
14      Illinois Company d/b/a Ameren Illinois (Ameren Illinois or AIC).

15      **Q.     What are your current responsibilities as Manager of Rates and Analysis?**

16      A.     I am responsible for supervising the administration of AIC's tariffs, regulated  
17      pricing, the development of AIC's cost of service studies, administration and  
18      maintenance of AIC's tariffs, and coordinating activity on other regulatory initiatives.

19      **Q.     Please describe your educational background and relevant work experience.**

20      A.     See my Statement of Qualifications attached as an Appendix to this direct  
21      testimony.

22 **B. Purpose, Scope and Identification of Exhibits**

23 **Q. What is the purpose of your direct testimony?**

24 A. The purpose of my testimony is to explain how Rate MAP-P – Modernization  
25 Action Plan - Pricing (Rate MAP-P) pricing is calculated for each of the three Ameren  
26 Illinois Rate Zones. My testimony sponsors the general rate design necessary to  
27 implement Rate MAP-P as well as the populated formula establishing initial effective  
28 pricing. I also explain the procedure for the annual update to Rate MAP-P and the  
29 operative tariff provisions generally.

30 **Q. Please summarize the conclusions of your direct testimony.**

31 A. As explained below, I conclude that:

- 32 • Initial Rate MAP-P pricing is provided and discussed as part of this  
33 testimony.
- 34 • The initial rate design for Rate MAP-P is established in accordance with the  
35 Final rate design set forth in Docket No. 09-0306 (cons.).
- 36 • Rate MAP-P administration, procedures, and operation, including the annual  
37 update process, are expressly provided for in the MAP-P tariff.

38 **Q. Are you sponsoring any exhibits with your direct testimony?**

39 A. Yes. I sponsor the following exhibits:

- 40 • Ameren Exhibit 9.1 – Rate MAP-P
- 41 • Ameren Exhibit 9.2 – Determination of Delivery Service Charges for Each  
42 Rate Zone in the Form of Appendix B
- 43 • Ameren Exhibit 9.3 – Bill Comparisons
- 44 • Ameren Exhibit 9.4 – Redline of Changes to Existing Tariffs (Table of  
45 Contents, Rates DS-1 – DS-5, and Tax Additions)

46 **II. RATE MAP-P OVERVIEW**

47 **Q. What is purpose of the proposed Rate MAP-P?**

48 A. The Rate MAP-P tariffs bring into effect the formula provisions provided by  
49 Section 16-108.5 of the Act. The tariffs contain and provide notice of the operative  
50 language of Rate of MAP-P and provide for the annual update of Delivery Service Rates  
51 and EDT Cost Recovery charges in conjunction with the Tax Additions tariff. There are  
52 three principle components of the MAP-P tariffs: (1) Determination of Revenue  
53 Requirement, (2) Determination of Delivery Service Charges, and (3) Annual update  
54 procedure and administration. My testimony discusses the latter two components. The  
55 revenue requirement development is discussed by Ameren Illinois witness Mr. Ronald  
56 Stafford. Ameren Illinois witness Mr. Robert Mill discusses the overall functionality and  
57 operation of the formulaic determination of revenue requirement provided for in the  
58 tariff. A copy of Rate MAP-P is provided in Ameren Exhibit 9.1.

59 **III. DELIVERY SERVICE CHARGES – RATE MAP-P PRICING**  
60 **DEVELOPMENT**

61 **Q. How is the actual effective pricing developed?**

62 A. Similar to ComEd, Ameren Illinois tariffs explain the development of the actual  
63 pricing in the tariff sections entitled “Determination of Billing Determinants”, and  
64 “Determination of Delivery Service Charges” and Appendix B. Those sections are  
65 located on proposed Original Sheet Nos. 16.002 through 16.003, and 18 through 18.025.  
66 The rates are essentially derivative of the formulaic revenue requirement as applied to  
67 weather normalized billing determinants and application of an Embedded Cost of Service  
68 Study (ECOSS). The Company uses a 10-year weather normalization period consistent

69 with what the Commission has previously approved. The Company's ECOSS is  
70 presented by Ameren Illinois witness Ryan Schonhoff and provides allocations for  
71 customers by Rate Zone and rate classification. The resulting rate design and effective  
72 pricing is consistent with the Commission's last electric rate decision in 2009 (Docket  
73 Nos. 09-0306 (cons.)). Since that rate order, the legacy Ameren Illinois Utilities  
74 (AmerenCIPS, AmerenCILCO, and AmerenIP) merged on October 1, 2010, after the  
75 Commission's Order establishing rate design protocols in Docket Nos. 09-0306 (cons.).  
76 AIC, however, still has based its revenue allocation and pricing using cost of service  
77 studies for individual Rate Zones corresponding to the legacy utilities..

78 **Q. Did you propose any substantive modifications to the rate design for the**  
79 **purposes of this proceeding?**

80 A. No, I did not. It is my understanding that the Act, specifically section 16-  
81 108.5(c)(6), requires use of a rate design and cost allocation methodology consistent with  
82 the Commission's most recent order regarding the utility's request for an increase in  
83 delivery service rates. It is also my understanding that the Act requires a follow-up  
84 revenue neutral rate design proceeding to occur after Rate MAP-P becomes effective.  
85 Therefore, I have not made any such proposals, as I understand such modifications must  
86 wait until that proceeding before suggesting any modifications to the delivery service rate  
87 design. Thus I used the parameters of the Commission approved rate design in Docket  
88 Nos. 09-0306 (cons.) exclusively to develop pricing.

89 **Q. What steps were followed to develop proposed prices?**

90 A. AIC followed a process using three major steps. First, the class cost of service for  
91 each Rate Zone was developed. Mr. Schonhoff provides the ECOSs for use in this  
92 proceeding. Second, a revenue allocation process similar to the one used in Docket Nos.  
93 09-0306 (cons.) determined the revenue responsibility for each class within each Rate  
94 Zone. Third, individual charge components for each Delivery Service Rate were adjusted  
95 following the methodology used in Docket Nos. 09-0306 (cons.). Each of these three  
96 steps is described in more detail in the MAP-P tariff, Appendix B.

97 **Q. Please provide a general description of the method used to adjust individual**  
98 **charge components for each Delivery Service Rate Zone.**

99 A. Key features from the Docket Nos. 09-0306 (cons.) Final Order used to develop  
100 the tariffs' formulaic calculation of charges, as detailed in Appendix B of MAP-P, is as  
101 follows:

- 102 • **Customer and Meter Charge**
- 103     ▪ For DS-1 and DS-2, Customer and Meter Charges shall be changed by an  
104     equal percentage amount equal to the overall total class revenue change  
105     allocated to DS-1 and DS-2, respectively, for Ameren Illinois.
- 106     ▪ For DS-3 and DS-4, Customer and Meter Charges shall not change.
- 107     ▪ For DS-5, Customer and Meter Charges shall be set equal to those  
108     developed for DS-2.
- 109 • **Transformation Capacity Charge (DS-3 and DS-4 only)**
- 110     ▪ Change by an amount equal to the overall total AIC revenue increase  
111     amount allocated to DS-3 and DS-4 for Ameren Illinois.
- 112 • **Meter Reassignment Charge (Rate Zone I only)**
- 113     ▪ For Rate Zone I customers, the Meter Reassignment Charge is equal to  
114     (150 \* Transformation Capacity Charge).

- 115           • **Reactive Demand Charge (DS-4 only)**
- 116           ▪ Change by an amount equal to the overall total AIC revenue increase  
117           amount allocated to DS-4 for Ameren Illinois.
- 118           • **EDT Cost Recovery (Electric Distribution Tax) and Distribution Delivery  
119           Charge (DS-4)**
- 120           ▪ The DS-4 charges for EDT Cost Recovery and the Distribution Delivery  
121           Charges must be established prior to determining comparable charges for  
122           DS-1, DS-2, DS-3, and DS-5. Once determined, the associated EDT Cost  
123           Recovery revenue requirement for each Rate Zone and for each rate class  
124           shall be removed from the delivery service revenue requirement and the  
125           resulting EDT Cost Recovery charges will be reflected in the Rate MAP-  
126           P Informational Sheet.
- 127           ▪ For DS-4, within each supply voltage subclass, change EDT Cost  
128           Recovery and Distribution Delivery Charges as follows:
- 129           ○ If the remaining rate change for DS-4 is a decrease, adjust the EDT  
130           Cost Recovery charge downward to achieve the revenue target, but  
131           not below  $\frac{1}{2}$  the EDT Cost Recovery average charge established in  
132           ECOSS. If the EDT Cost Recovery charge reaches  $\frac{1}{2}$  the average  
133           rate established in ECOSS or is already below the average rate  
134           established in ECOSS, decrease the EDT Cost Recovery charge and  
135           Distribution Delivery Charge by equal percentage amounts until the  
136           revenue target is reached.
- 137           ○ If the remaining rate change for DS-4 is an increase and the EDT  
138           Cost Recovery charge is more than  $\frac{1}{2}$  the average charge  
139           established in ECOSS, increase the EDT Cost Recovery charge up  
140           to the average cost established in the ECOSS to achieve the revenue  
141           target. If additional rate revenue is required, increase the  
142           Distribution Delivery Charge to achieve the revenue increase  
143           amount.
- 144           ○ For situations where the remaining rate change for DS-4 is an  
145           increase and the EDT Cost Recovery charge is less than  $\frac{1}{2}$  the  
146           average cost established in ECOSS, increase both the EDT Cost  
147           Recovery and Distribution Delivery Charges by equal amounts until  
148           the EDT reaches  $\frac{1}{2}$  the average cost established in ECOSS.  
149           Thereafter, follow the process outlined above for situations where  
150           the EDT Cost Recovery charge is more than  $\frac{1}{2}$  the average cost  
151           established in the Cost of Service Study.

- 152       • **EDT Cost Recovery (Electric Distribution Tax) (DS-1, DS-2, DS-3, and**  
153       **DS-5)**
- 154             ▪ For DS-1, DS-2, DS-3 and DS-5, set at average rate established in  
155             ECOSS, plus an amount of any revenue shortfall for this price component  
156             associated with rate limitations applied to DS-4.
- 157       • **Distribution Delivery Charge (DS-1, DS-2, and DS-3)**
- 158             ▪ For DS-1 through DS-3, change Distribution Delivery Charges by equal  
159             percentage amounts sufficient to reach the applicable revenue  
160             requirement target for the class or subclass.
- 161       • **Rate Limiter (DS-3 and DS-4 Only)**
- 162             ▪ Keep the total dollar rate limitation approximately the same under the  
163             new charges as it is under present charges for each Rate Zone by  
164             changing the rate limiter amounts, respectively, for each Rate Zone. May  
165             require one or more iterations due to dependence on the Distribution  
166             Delivery Charge as an input to the Rate Limiter amount, and the  
167             Distribution Delivery Charge may be one of the last charge components  
168             established.
- 169       • **Fixture Charges and Distribution Delivery Charges (DS-5)**
- 170             ▪ Change Fixture Charges and Distribution Delivery Charges by equal  
171             percentage amounts sufficient to reach the applicable revenue  
172             requirement target for the class.
- 173             ▪ Change Customer and Meter Charges to be equal to those established for  
174             DS-2.

175 **Q. Has Ameren Illinois developed separate prices by Rate Zone?**

176 A. Yes. The process outlined above ensures charges recover the revenue  
177 requirement allocated to each Rate Zone, which necessitates that some prices differ  
178 among Rate Zones. However, consistent with the outcome in Docket Nos. 09-0306  
179 (cons.), several price components are uniform, and will remain uniform, among the Rate  
180 Zones (i.e., Customer, Meter, Transformation, and Reactive Demand Charges).

181 **IV. RATE MAP-P – OPERATIVE PROCEDURES AND ADMINISTRATIVE**  
182 **PROVISIONS**

183 **Q. Does the Rate MAP-P tariff provide guidance as to the procedures and**  
184 **administration of its operation?**

185 A. Yes, it does so expressly. Key procedural and administrative tariff provisions of  
186 MAP-P include:

- 187 • Applicability section (Original Sheet No. 16)
- 188 • Definitions section (Original Sheet No. 16)
- 189 • Application of Delivery Service Charges section (Original Sheet No. 16.003  
190 through Original Sheet No. 16.004)
- 191 • Informational Filings section (Original Sheet No. 16.004 through Original  
192 Sheet No. 16.005)
- 193 • Annual Updates section (Original Sheet No. 16.005 through Original Sheet  
194 No. 16.006)
- 195 • Tariff Changes section (Original Sheet No. 16.007), and
- 196 • Miscellaneous General Provisions section (Original Sheet No. 16.007  
197 through Original Sheet No. 16.008)

198 **Q. What does the Applicability section state?**

199 A. The Applicability section states that Rate MAP-P is applicable to all retail  
200 customers.

201 **Q. What is the purpose of the Definitions section?**

202 A. The Definitions section provides the meanings for certain terms used in Rate  
203 MAP-P and notes that other terms used in the tariff are provided in the General Terms  
204 and Conditions of AIC's Schedule of Rates.

205 **Q. What is the purpose of the Application of Delivery Service Charges section?**

206 A. The provisions in the Application of Delivery Service Charges section address  
207 three points. First, they establish that delivery service charges determined annually in  
208 accordance with the provisions of Rate MAP-P for application beginning with a January

209 monthly billing period and extending through the following December monthly billing  
210 period. However, the initial delivery service charges determined in accordance with the  
211 provisions of Rate MAP-P are determined for application for electric service provided  
212 beginning with the effective date of the Original Informational Sheet and extending until  
213 modified pursuant to a rate update. Second, the provisions note that the tariff is  
214 terminable in accordance with provisions of 220 ILCS 5/16-108.5, and if such event  
215 occurs, the rates in effect at the time of termination shall survive until new rates become  
216 effective in accordance with the Act. Third, the provisions note that the base rate  
217 delivery service charges determined in accordance with the provisions of Rate MAP-P  
218 are applied in accordance with the tariffs under which AIC provides customers with  
219 electric service. Those tariffs include: Rate DS-1 – Residential Delivery Service, Rate  
220 DS-2 – Small General Delivery Service, Rate DS-3 – General Delivery Service, Rate DS-  
221 4 – Large General Delivery Service, Rate DS-5 – Lighting Service, Rider PER –  
222 Purchased Electricity Recovery, Rider BGS – Basic Generation Service, and Rider HSS –  
223 Hourly Supply Service.

224 **Q. Please describe what is contained in the Informational Filings section?**

225 A. The Informational Filings section identifies the timing associated with when AIC  
226 must file with the Commission for informational purposes the updated delivery service  
227 charges determined in accordance with the provisions of Rate MAP-P. This section also  
228 includes provisions describing the documentation that must accompany the informational  
229 filings. In addition, this section addresses the informational filings that AIC must make

230 in the event that the applicability of a set of delivery service charges must extend beyond  
231 a December monthly billing period.

232 **Q. Please explain the purpose of the section entitled “Annual Update”**

233 A. Rate MAP-P will update each year. The update provision of the tariff provides  
234 for the filing of this annual update. The annual filing will occur each year by May 1. At  
235 that time an informational filing will be made that will set the applicable pricing for the  
236 following year until the next annual update.

237 **Q. What is contained in the Tariff Changes section?**

238 A. The Tariff Changes section addresses circumstances where revisions may be  
239 made to the tariff language included in Rate MAP-P. Referring back to 16-108.5 of the  
240 Act, this section addresses possible tariff revisions as a result of an Order (a) issued by  
241 the Commission under its authority as presented in Article IX of the Act, (b) with revenue  
242 neutral rate design changes issued by the Commission within one year after the initial  
243 effective date of Rate MAP-P in a rate design proceeding, (c) with revenue neutral rate  
244 design changes issued by the Commission after a proceeding that was initiated in  
245 response to revenue neutral tariff changes proposed by AIC, or (d) with revenue neutral  
246 rate design changes issued by the Commission after a proceeding that was initiated after  
247 AIC re-filed the provisions of the Determination of Delivery Service Charges section of  
248 Rate MAP-P without tariff changes.

249 **Q. Please describe what is contained in the Miscellaneous General Provisions**  
250 **section?**

251 A. This section includes three provisions. The first provision in this section clarifies  
252 that costs recovered by AIC through other automatic adjustment tariffs are not recovered  
253 through the application of Rate MAP-P. The second provision clarifies that a cost is not  
254 allowed to be recovered through the application of Rate MAP-P simply by virtue of the  
255 fact that it is listed in AIC's Federal Energy regulatory Commission ("FERC") Form 1.  
256 The final provision explains that Rate MAP-P is part of AIC's Schedule of Rates and, as  
257 applicable, is subject to the Customer Terms and Conditions and other tariffs in that  
258 Schedule of Rates.

259 **V. PRICING**

260 **Q. Please provide the calculated pricing resulting from the filing of the tariffs in**  
261 **this proceeding.**

262 A. Ameren Exhibit 9.2 contains the populated spreadsheets provided in Appendix B  
263 to Rate MAP-P, which supplements the "Determination of Delivery Service Charges"  
264 section. As noted above, the actual effective rates and charges are the product of the  
265 revenue requirement development presented by Mr. Stafford and in accordance with  
266 results of the ECOSS presented by Mr. Schonhoff. Weather normalized billing  
267 determinants were used to establish the actual resultant pricing for all customer classes.

268 **Q. Has the value for delivery service "Uncollectible Recovered in Base Rates"**  
269 **used in conjunction with Rider EUA – Electric Uncollectible Adjustment, changed**  
270 **through application of Rate MAP-P?**

271 A. Yes. The proposed uncollectible base delivery service values have been updated  
272 to reflect proposed expense levels. The values will be shown in the Rate MAP-P

273 Informational Sheet. The values themselves do not impact prices customers pay.  
274 Instead, the values are considered a subset of the Customer Charge and used the AIC to  
275 track the amount of uncollectible expense is “included in rates” for administration of  
276 Rider EUA.

277 **Q. Does Ameren Exhibit 9.2 contain a summary of prices necessary to achieve**  
278 **the net revenue requirement presented by Mr. Stafford?**

279 A. Yes. The summary of prices are contained on pages 31 through 34 of Ameren  
280 Exhibit 9.2, and represent an example of what the Original Informational Sheet will  
281 contain. A revenue proof, similar to Part 285 Schedule E-5, is contained within  
282 Appendix B of Rate MAP-P. These calculations are shown on pages 6-13, 14-21, and  
283 22-29 of Ameren Exhibit 9.2 for Rate Zones I, II, and III, respectively.

284 **VI. BILL IMPACTS**

285 **Q. Have you developed bill impacts that the proposed change in charges will**  
286 **have on various customers?**

287 A. Yes, bill impacts are provided in Ameren Exhibit 9.3. Pages 1-2 show the impact  
288 of price changes on a series of residential customers. Pages 3-5 show the impact on a  
289 series of residential and non-residential customers.

290 **VII. MISCELLANEOUS TARIFF ISSUES**

291 **Q. Will implementation of MAP-P require changes to other tariffs?**

292 A. Yes. Changes to Table of Contents, Rates DS-1 – DS-5, and Tax Additions are  
293 required. The changes to the Table of Contents are necessary to include Rate MAP-P.  
294 The tariff changes are shown in redline format on Ameren Exhibit 9.4.

295 **Q. What changes are required to Rates DS-1 – DS-5?**

296 A. Presently, Rates DS-1 through DS-5 each explicitly list charges for service within  
297 those tariff sheets. Once MAP-P is effective, charges for service will instead be shown in  
298 informational sheets under the terms of the MAP-P tariff. Accordingly, changes to Rates  
299 DS-1 through DS-5 remove the explicit charges from those tariffs and instead refer to the  
300 informational sheets provided under MAP-P.

301 **Q. What changes are required to the Tax Additions tariff?**

302 A. Similar to the changes to Rates DS-1 through DS-5, the Tax Additions tariff  
303 presently contains a listing of charges for the EDT Cost Recovery (aka Distribution Tax)  
304 applicable to rate classes in each Rate Zone. The EDT Cost Recovery values have been  
305 removed from the Tax Additions tariff and will likewise be shown in the MAP-P  
306 informational sheets.

307 **VIII. PUBLIC NOTICE**

308 **Q. Did Ameren Illinois Company file Notice of Proposed Change in Schedule to**  
309 **implement the changes to tariffs?**

310 A. Proofs of publication will be filed with the Commission upon receipt as a late  
311 filed exhibit to my testimony.

312 **IX. CONCLUSION**

313 **Q. Does this conclude your direct testimony?**

314 A. Yes, it does.

**APPENDIX**

**STATEMENT OF QUALIFICATIONS**  
**LEONARD M. JONES**

My name is Leonard M. Jones. My business address is One Ameren Plaza, 1901 Chouteau Avenue, St. Louis, Missouri 63103. I am employed by Ameren Illinois Company as Manager, Rates & Analysis.

I graduated from Western Illinois University with a Bachelor of Arts Degree in Economics in 1987. In 1988, I received a Master of Arts Degree in Economics, also from Western Illinois University. From 1988 through 2004 I was employed by Illinois Power Company ("Illinois Power") as a Rate Analyst, Senior Rate Analyst, Rate Specialist, Team Leader - Costing and Economic Services, and Director – Business Planning and Forecasting. Shortly after completion of Ameren Corporation's ("Ameren") acquisition of Illinois Power, I became Managing Supervisor – Restructured Services, Regulatory Policy and Planning. In 2008, I was promoted to my current position.

I previously testified before the Illinois Commerce Commission in Docket No. 91-0335, regarding Illinois Power's electric marginal cost of service study; Docket No. 93-0183, regarding Illinois Power's gas marginal cost of service study; Docket No. 98-0348, regarding Illinois Power's proposed Rider DA-RTP II; Docket No. 98-0680, regarding the investigation concerning certain tariff provisions under Section 16-108 of the Public Utilities Act and related issues; Docket No. 98-0769, regarding requirements governing the form and content of contract summaries for the 1999 Neutral Fact Finder; Docket Nos. 99-0120 & 99-0134 (Cons.) regarding approval of Illinois Power's Delivery

Service Implementation Plan and Tariffs; Docket Nos. 00-0259/00-0395/00-0461 (Cons.) regarding proposed Rider MVI and revisions to Rider TC; Docket 01-0432 regarding electric Delivery Service Tariff rate design and related matters; Docket 04-0476 regarding gas rate design; Docket Nos. 06-0070/06-0071/06-0072 (Cons.) regarding electric Delivery Service Tariff rate design and related matters; Docket Nos. 06-0691/06-0692/06-0693 (Cons.) regarding residential real-time pricing tariffs; Docket 06-0800 regarding an investigation into changes to auction process and the Ameren Illinois Utilities' market value tariffs (Rider MV); Docket 07-0165 regarding an investigation into the Ameren Illinois Utilities' rate design, Docket 07-0527 regarding tariff changes resulting from passage of the IPA Act; Docket 07-0585 – 07-0590 (cons.) regarding electric rate design; Docket 07-0539 regarding electric energy efficiency programs; Docket 08-0104 regarding gas energy efficiency programs; Docket 09-0306 – 09-0311 (cons.) regarding electric rate design; Docket 09-0535 regarding Rider EDR and GER reconciliation; Docket 10-0095 regarding tariff changes required for on-bill financing programs; and Docket 10-0517 regarding a petition for an accounting order; Docket Nos. 11-0279 and 11-0282 (Cons.) regarding electric Delivery Service Tariff rate design and related matters; Docket 11-0341 regarding reconciliation of revenue and costs under Riders EDR and GER; Docket 11-0358 regarding purchase of uncollectible receivables tariff provisions; and Docket 11-0383 regarding Rider TS-Transmission Service reconciliation.