

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission)	
On Its Own Motion)	
)	Docket No. 06-0703
)	
Revision of 83 Ill. Adm. Code 280)	
)	

**REPLY BRIEF ON EXCEPTIONS
OF AMEREN ILLINOIS COMPANY**

DATED: July 20, 2012

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I. INTRODUCTION

Ameren Illinois Company (“Ameren Illinois”) respectfully submits to the Illinois Commerce Commission (“ICC” or “Commission”) this Reply Brief on Exceptions, which addresses certain exceptions raised by the Staff of the Illinois Commerce Commission (“Staff”); AARP (“AARP”); the People of the State of Illinois (“AG”); Governmental and Consumer Intervenor (“GCI”); Illinois-American Water Company (“IAWC”); South Austin Coalition Community Council and Community Action for Fair Utility Practice (collectively referred to as Low Income Residential Customers (“LIRC”)); and Northern Illinois Gas Company, d/b/a Nicor Gas Company (“Nicor”). For the reasons that follow, as well as those set forth in Ameren Illinois’ previous filings in this docket, the Commission should deny the requests to change the Administrative Law Judge’s Proposed Order (“ALJPO”) as explained herein, and instead enter a Final Order consistent with the exceptions requested or supported by Ameren Illinois, which are supported by record and would be fair to all parties.

II. ARGUMENT

A. SUBPART A: GENERAL

1. Section 280.10 Exemptions

(a) Reply to GCI

Ameren Illinois opposes GCI’s exception to this section of the new rule, which seeks to have utilities be required “to document to the Commission on an annual basis [] any exemption to a particular provision of Part 280” and require “that the Commission approve such waivers [] on an annual basis.” GCI BOE, pp. 2-3. GCI assert that such reporting and annual review and approval of all waiver requests is necessary to provide customers and consumer advocates a way to determine which utilities have been granted exemptions by the ICC. *Id.* But the ALJPO

correctly adopted Staff's proposed language over GCI's onerous alternative (ALJPO, p. 21), and GCI's latest request provides the Commission with no basis to alter that outcome.

GCI's request should again be rejected because: (1) adding additional reporting requirements and an annual review process will increase costs without providing corresponding benefits; (2) there are other means for consumers to learn about exemptions, including getting such information from the ICC and the utility itself; and (3) GCI offer no credible rationale for adopting its proposals. ALJPO, pp. 16-17 (summarizing Staff's position); 18-19 (summarizing ComEd's position); 20 (summarizing IAWC's and Ameren Illinois' positions). Additionally, the Proposed Rule attached to the ALJPO specifies that "[a] petition for exemption or modification shall be filed pursuant to 83 Ill. Adm. Code 200 and shall include specific reasons and facts in support of the requested exemption or modification." ALJPO, Attachment, p. 4. Thus, the ALJPO already provides for a public procedure for obtaining an exemption in which interested parties may intervene and consumers may observe. And the required petition would be resolved by way of a publicly available ICC Order. *Id.* GCI simply offer no credible reason why this public procedure is inadequate nor do GCI sufficiently explain why the additional costs associated with additional reporting and annual ICC review are warranted. For these reasons, the Commission should reject GCI's proposal.

2. Section 280.15 Compliance

(a) Reply to Staff

With respect to providing time for utilities to become compliant with the new final rule, the ALJ correctly found that:

[T]he overwhelming weight of the evidence suggests that conforming utility systems to these rules will be expensive and time consuming. Per ComEd's suggestion, the Commission finds that it will require implementation of each requirement as quickly

as reasonably practicable, but in no event later than 24 months
from the date of the effectiveness of the rules . . .

ALJPO, p. 32. Staff now asks that the Commission change the ALJPO to: (1) give utilities 12 months instead of 24 months to comply with the new requirements of Part 280 because Staff “believ[es] that two years is simply too long” and (2) require that utilities schedule implementation of the revised Part 280 such that utilities would have a restriction on how to conform their systems to become compliant with the new rule. Staff BOE, p. 3. Both of these proposals have no support in the record, plainly contradict the “overwhelming evidence” that is in the record, and would add unnecessary (and unintended) complication to the implementation process.

As explained in Ameren Illinois’ prior submissions, “two years appears to be the reasonable compromise supported by the record” – a record in which at least one utility (MCPU) advocated for up to *four years* to come into compliance with the new rule. Ameren Reply Br., p. 8. Staff’s last minute decision to offer a “compromise” that would cap the implementation period at 12 months finds no support in the record and is based on nothing more than Staff “still believing that two years is simply too long.” Staff BOE, p. 3. And Staff has already admitted that it “lacks IT expertise and is uncertain as to how long that [implementation] timeline should be.” Staff Br., p. 7. Commission findings and conclusions, however, must be based on evidence in the record, not the belief of a party that has admitted it has no expertise or certain knowledge of the issue at hand. Accordingly, Staff’s request to reduce the implementation period to 12 months should be denied out of hand.

Moreover, Staff’s suggestion to require utilities to implement the requirements of the new rule “in a balanced manner so that requirements which benefit utilities are not given priority over those that benefit consumers” is both confusing and unnecessary. Staff BOE, p. 3. For example,

Staff has not identified a single “requirement” that it considers beneficial to solely a customer or a utility, nor has Staff explained how the implementation process could be sliced up such that “requirements” of the new rule could even be looked at, and prioritized, separately for compliance purposes. Staff also cites no evidence that even suggests that utilities intend to, let alone will, implement the new requirements in any way other than in a balanced manner that would result in implementation “as quickly as reasonably practicable” in accordance with the ALJPO, making Staff’s suggested change unnecessary. ALJPO, p. 32.

The bottom line is, the record contains “overwhelming” evidence about the complexity of the revisions and the extensive amount of time and resources necessary to implement the final revisions to the rule. ALJPO, p. 32. Staff’s proposed changes to this section should not be adopted.

(b) Reply to GCI

Ameren Illinois also opposes GCI’s exceptions to Section 280.15 for the same reasons set forth in opposition to Staff’s exceptions set forth above. However, GCI go further and ask the Commission to shorten the implementation period cap from “24 months from the effective date of the rules” (ALJPO, Attachment, p. 4) to “24 months from the date of the First Notice Order” (GCI BOE, p. 10). This proposal, too, must be rejected. It simply makes no sense to start calculating a compliance period *before* the new rule becomes effective. Nor does it make sense to incur considerable expense implementing requirements that are not yet final regardless of how sure GCI are that the requirements will not change substantially. Much like Staff, GCI cite no credible evidence – but merely their conclusory beliefs – to support a finding that utilities will “delay” implementation of the new rule. *Id.*, p. 5. That is because the “overwhelming” evidence

supports the ALJPO's analysis and conclusions with respect to Section 280.15 (ALJPO, p. 32), and the Commission should not change them in the way requested by GCI.

3. Section 280.20 Definitions

(a) Reply to IAWC

Ameren Illinois supports IAWC's exception to the definition of "Tampering" because it is good policy to have the definition clearly specify that tampering includes damage to utilities' equipment or facilities and that those utilities can seek restitution for damage to their facilities and discontinue service in the event of nonpayment of such restitution. As explained by IAWC, the definition adopted by the ALJPO could be read to assume that tampering involves theft of utility *service* only, and restitution is not provided by other sections of the rule. IAWC BOE, pp. 5-7. Making the changes suggested by IAWC would benefit both the utility and consumer by clearly specifying the prohibited conduct and the consequences of "tampering." Ameren Illinois thus supports IAWC's exceptions to the ALJPO in this regard.

B. SUBPART B: APPLICATIONS FOR UTILITY SERVICE

1. Section 280.30 Application

(a) Reply to Staff (Section 280.30(c))

Ameren Illinois opposes Staff's exception to Section 280.30(c)(2) regarding when utilities can collect for service that was requested through a third party application. Section 280.30(c)(2), as approved by the ALJPO, allows for third party applications for service, as long as utilities verify that the third party was authorized by the applicant. ALJPO, Attachment, p. 7. Commonwealth Edison Company ("ComEd") proposed adding a rebuttable presumption to the rule: "[i]f a utility fails to verify authorization . . . the named customers who reside and receive mail at the service/billing address will be rebuttably presumed to have authorized the application

if they do not contact the utility to contest billing within six months of service activation.” *Id.* Ameren Illinois supports ComEd’s proposed language, which the ALJPO adopted. ALJPO, p. 60. This rebuttable presumption would serve to limit uncollectible debt caused by the circumstances outlined by ComEd: customers could have a relative sign them up for service, then sit for months or years accepting the benefits of the service, receiving bills in their name at the address where they live, only to be able to deny responsibility for the past due charges when the disconnection notice arrives. *Id.*, p. 59. The Commission should not approve a rule that would allow for such a scenario to take place. Accordingly, Staff’s proposed changes should not be adopted.

(b) Reply to GCI (Section 280.30(b), (d), (e), and (j))

Ameren Illinois also opposes GCI’s exception to Section 280.30(b) that utilities should be required to disclose information about customer rights and options during the application process (GCI BOE, p. 11) because requiring utilities to provide extensive information at the time of application is unnecessary and would be onerous. The ALJPO rightly rejected GCI’s suggestion at the outset, and reflects adoption of Staff’s suggested language to this section, which Ameren Illinois supports. ALJPO, p. 53. As Staff has explained, the two topics of disclosure GCI are most concerned about – deposits and low income customer rights – are already addressed in other sections of the rule. Staff Initial Br., pp. 14-15 (deposit disclosures), 81-82 (low income customer rights disclosures). And applicants, once they become customers, would receive information on their rights from their utility. GCI have not provided credible evidence to contradict these points. Thus, there is simply no justification to incur the expense associated with requiring additional disclosures by the utility during the application process.

Ameren Illinois also opposes GCI's exception to Section 280.30(d) that the rule should not require applicants to provide a "government issued" ID, but rather only a "verifiable" ID. GCI BOE, p. 14. Such a change would be improvident because any benefit this may give to a small number of applicants who do not have government issued IDs is outweighed by the risk of fraud to the utility through the use of the less stringent "verifiable" identification standard.

Additionally, GCI's exception to Section 280.30(e), seeking to require a utility to offer a payment plan to customers so they can pay past due amounts (as required before a transfer of service), should also be rejected. GCI BOE, p. 16. Ameren Illinois supports the ALJPO, which adopted Staff's position that the utility should have discretion to either refuse to extend additional credit when the customer has left the utility's service with an unpaid final bill and insist that the debt be paid in full before service is activated or have the option to provide the applicant with yet another payment agreement to retire the debt. Staff Pos. St., p. 16. A utility's ability to collect amounts owed to it prior to establishing service and extending additional credit should not be restricted. Such restriction would be harmful to the utility and the other ratepayers who do pay their debts in a timely fashion by leading to increased uncollectible expenses.

Finally, Ameren Illinois opposes GCI's exception to Section 280.30(j)(1) seeking to shorten the time for activation of electric service from four days to three days, and activation of natural gas service from seven days to five days. GCI BOE, p. 18. Like many of GCI's positions, this position has been suggested by GCI before, and it has been strongly opposed by Staff, ComEd, IAWC, MidAmerican Energy Company ("MEC"), Nicor, and Peoples Gas Light and Coke Company and North Shore Gas Company ("PG/NS") in prior briefing. *See* Staff Br., p. 20; ComEd Br., p. 10; IAWC Br., p. 28; MEC Br., p. 19; Nicor Br., p. 35; PG/NS Br., pp. 12-13. Yet, GCI still offer no credible rationale for their proposal to shorten activation timeframes

and provide no explanation as to how customers could or would have an issue with the timeframes approved by the ALJPO. *See* GCI Br., p. 34. As explained in Ameren Illinois' Initial Brief, utilities have an incentive to activate accounts as quickly as possible, but three calendar days may simply not be enough time to complete the administrative work, credit checks and other steps necessary to complete activation. Ameren Br., pp. 12-13. Indeed, Staff has "not seen any evidence that utilities have ever intentionally delayed activation of service" Staff Ex. 3.0, p. 11, lines 247-51. In light of the record evidence, as well as GCI's absence of support, Ameren Illinois supports the ALJPO's analysis and conclusions with respect to this section, which should not be changed in the manner requested by GCI.

C. SUBPART C: DEPOSITS

1. Section 280.40 Deposits

(a) Reply to GCI (Section 280.40(d) and (e))

Ameren Illinois opposes GCI's exception to Section 280.40(d)(3) seeking to limit the use of credit scores as the basis for assessing deposits. GCI BOE, p. 21. Ameren Illinois supports the language adopted by the ALJPO, which allows utilities to require deposits from residential applicants whose credit scores do not meet the minimum standard of the credit scoring system described in the utility's tariff. ALJPO, p. 96. As set forth in Ameren Illinois' Position Statement, "[c]redit scores indicate which customers are likely to fall behind on billing, allowing a utility to make upfront risk assessments that mitigate uncollectible amounts." Ameren Pos. St., p. 9. The uncollectible amounts that utilities are able to mitigate based on this provision are large – Ameren Illinois, for example, was able to mitigate \$3.7 million of uncollectible losses in 2010 because of deposits collected from customers with low credit scores. Ameren Pos. St, p. 9. Such mitigation lightens the burden of uncollectible losses on other ratepayers who pay their

bills on time. GCI, however, argue that “the most relevant predictor of customer utility bill payment is past customer *utility* billing history.” GCI BOE, p. 22. Even if utility billing history is the “most” relevant predictor of customer utility bill payment (which it is not), such would not refute the indisputable facts that “credit scoring [is] a viable means to assess potential risk” (Staff Pos. St., p. 23), and credit scores serve a critical role in efficiently mitigating significant uncollectible expense (Ameren Pos. St., p. 9). GCI’s position that credit scores do not assess credit risk is nonsensical, is not supported by the record, and should be rejected. The ALJPO reflects careful consideration of the record and should not be altered in the manner suggested by GCI.

Ameren Illinois also opposes GCI’s exception to Section 280.40(e) regarding the deposit exemption for customers who have had service for at least 24 months. GCI BOE, p. 26. GCI take exception to the ALJPO’s adopted language that eliminates deposit immunity based on tenure. *Id.*, pp. 26-27. Ameren Illinois supports the ALJPO’s language, which was proposed by Staff, because customer tenure “does not necessarily reflect the customer’s current conditions” (ALJPO, p. 96), and the “risk to the utility does not change simply because a person has been a customer for the arbitrary period of 2 years” (*id.*, p. 99). The language adopted by the ALJPO provides sufficient customer protection because it prohibits the assessment of a deposit except in appropriate circumstances and eliminates the “illogical” 24 month exemption. *Id.*, p. 101. GCI have provided no credible evidence or argument that establishes otherwise. Accordingly, GCI’s proposed deposit immunity for long term customers should not be adopted.

(b) Reply to Nicor (Section 280.40(b))

Ameren Illinois supports Nicor’s exception to Section 280.40(b)(1) related to initial deposit notifications. Nicor BOE, p. 11. Like Nicor, Ameren Illinois opposes the language

suggested by GCI and adopted by the ALJPO that requires utilities to provide an initial notice before a deposit is assessed. ALJPO, Attachment, p. 13. The additional requirement is unnecessary because utilities already inform customers at the time service is initiated whether a deposit will be assessed. For example, Nicor has a system by which the customer is verbally informed whether a deposit will be assessed, the amount of the deposit, and that the deposit will appear on the first bill. Nicor BOE, p. 11. As supported by the evidence cited by Nicor, utilities are in the best position to determine the most effective method for informing customers about deposits, and “[r]equiring that a written notice be served prior to assessing a deposit serves no purpose other than delay.” Nicor BOE, p. 12. Accordingly, Nicor’s proposed changes to this section should be adopted.

D. SUBPART D: REGULAR BILLING

E. SUBPART E: PAYMENT

F. SUBPART F: IRREGULAR BILLING

1. Section 280.90 Estimated Bills

(a) Reply to GCI

Ameren Illinois opposes GCI’s exception to Section 280.90 that utilities must be required to “routinely issue every bill based on an actual meter read.” GCI BOE, p. 31. GCI’s proposed language plainly contradicts the ALJPO, which is supported by a reasonable consideration of the record, and would lead to a prohibition on “render[ing] a bill based on estimated usage for more than [two (2)] consecutive billing periods or one (1) year, whichever is less, except under conditions described in subsection (a)(1) of this rule.” *Id.*, pp. 34-35. Ameren Illinois continues to oppose GCI’s proposal for at least the following three reasons: “(1) there are sometimes circumstances beyond a utility’s control that prevent the utility from reading a meter; (2) the failure of two consecutive meter reads does not mean service was not provided; and (3) under

GCI's proposal, the cost of such service would be unfairly borne by other customers." Ameren Pos. St., p. 13. And GCI's proposal has little support in either the record or from other parties, including Staff. The ALJPO correctly rejected GCI's proposed changes to Section 280.90, and the Commission should do the same.

G. SUBPART G: REFUNDS AND CREDITS

1. Section 280.110 Refunds and Credits

(a) Reply to Nicor (Section 280.110(d))

Ameren Illinois supports Nicor's exception to Section 280.110(d) to clarify that a "credit balance that results from a cancel and re-bill shall not be considered an overpayment for the period of time prior to the date of the cancel and re-bill." Nicor BOE, p. 13. A cancel and re-bill situation arises when the "actual reading for [the] current month is less than estimated reading for [the] prior month, resulting in a cancel and re-bill for the two month period." Nicor BOE, p. 13. Nicor's proposal should be adopted because it reflects the reality that "[i]n a cancel and re-bill situation, the credit does not exist until the transaction is completed in the billing system." Nicor BOE, p. 13. Ameren Illinois agrees that utilities should not be required to pay interest on overpayments until they arise. Nicor's proposal should thus be adopted.

H. SUBPART H: PAYMENT ARRANGEMENTS

I. SUBPART I: DISCONNECTION

1. Section 280.130 Disconnection of Service

(a) Reply to AARP, AG, City of Chicago, and LIRC (Section 280.120(e))

Ameren Illinois opposes the exceptions of AARP, AG, City of Chicago, and LIRC with respect to proposed Section 280.130(e)(5), which would require that utilities "knock" on a customer's door prior to disconnection. After much consideration of the parties' positions and

the record evidence, the ALJPO squarely rejected proposed Section 280.130(e)(5), a rejection that Ameren Illinois supports. As noted in the ALJPO, the parties' arguments in favor of the proposed Section 280.130(e)(5) are without merit. ALJPO, p. 189. For example, utility personnel that perform disconnections "are not trained or empowered to address medical or mental health questions that may arise from the contact," and concerns about the health consequences of disconnecting service in extreme weather is addressed by Illinois law's prohibition on disconnection during extreme hot or cold weather. *Id.*, p. 189. Moreover, the concern that a premise visit may uncover "mechanical safety hazards" is also already addressed by periodic safety inspections. *Id.*, p. 186. But perhaps most importantly, the new rule should not contain a knock-at-the-door requirement prior to disconnection because it would put the utility employee in a potentially dangerous situation. Ameren Br., p. 25; Ameren Reply Br., p. 22. AARP, AG, City of Chicago, and LIRC have provided the Commission with little more than rehashed arguments not supported by the record, and their request for approval of the proposed Section 280.130(e)(5) should again be rejected.

(b) Reply to LIRC (Section 280.130(j) and (l))

Ameren Illinois also opposes LIRC's exception to Section 280.130(j) in which it argues that a second contact should be required prior to disconnection. LIRC BOE, p. 3. Ameren Illinois agrees with Staff that "a single call is appropriate after the customer has already received a written disconnection notice." Staff Pos. St., p. 52. LIRC's suggestion that utilities make two telephone calls over a 24-hour period to a delinquent customer before disconnection is unreasonable and unsupported by the record. First, the customer is aware of the pending disconnection through notices. Second, there is no evidence the increased cost associated with

the proposal will result in fewer disconnections. Ameren Pos. St., p. 16. Ameren Illinois agrees with the ALJPO's adoption of Staff's single-call requirement and it should not be changed.

Ameren Illinois also opposes LIRC's proposal that Section 280.130(l) be modified such that "shutoffs should not take place after hours and on weekends or Holidays." LIRC BOE, p. 4. This proposal is unnecessary and should not be adopted because LIRC's concern about shutoffs is already addressed by the prohibition against shutoffs when the utility is not prepared to immediately restore service.

J. SUBPART J: MEDICAL CERTIFICATION

1. Section 280.160 Medical Certification

(a) Reply to GCI (Section 280.160(h))

Ameren Illinois opposes GCI's exception to Section 280.160(h) that the utility should be "obligated to attempt to negotiate an individual payment plan and only implement the automatic (12-month) DPA if the customer fails to respond or refuses to negotiate any payment plan." GCI BOE, p. 42. Ameren Illinois agrees with Staff that GCI's proposal is "overly complicated and requires customers to divulge personal information." Staff Pos. St., p. 58. Households with medical problems likely do not want the hassle of negotiating yet another payment plan. *Id.*, p. 58. And the proposed rule contains sufficient customer protections: under a Medical Payment Arrangement ("MPA"), the first bill is not due until "after 30 days from the certification date" (proposed Section 280.160(h)(1)), and the MPA protects customers from disconnection for 60 days (proposed Section 280.160(g)). Thus, GCI's proposal to require utilities to negotiate MPAs is unduly complicated, unnecessary and should not be adopted.¹

¹ Ameren Illinois emphasizes that it has already compromised on its position with respect to MPAs. In the interest of reducing the number of contested issues, Ameren Illinois did not press its original proposal to require an upfront good faith effort payment as part of entering into a MPA.

(b) Reply to Nicor (Section 280.160(i))

Ameren Illinois supports Nicor's exception to Section 280.160(i) in which it correctly explains that an account with a prior valid medical certificate should be recertified only *after* the total account balance has been brought current. Nicor BOE, p. 16. The language adopted by the ALJPO grants eligibility for recertification based on the passage of 12 months alone, regardless of whether the prior MPA account balance has been brought current. ALJPO, Attachment, p. 50. But, as Nicor asserts, "it goes beyond reasonable accommodation and enters the social services area to require utility acceptance of repeated medical certificates notwithstanding the failure to successfully complete a prior MPA." Nicor BOE, p. 17. Ameren Illinois supports Nicor's position that the proposed rule has no place for a provision that facilitates chronic non-payment at the expense of other ratepayers. Ameren BOE, p. 8. The language adopted by the ALJPO should be modified so that previously certified accounts must be brought current before recertification.

K. SUBPART K: RECONNECTION

1. Section 280.170 Timely Reconnection of Service

(a) Reply to GCI (Section 280.170(b) and (f))

Ameren Illinois opposes GCI's exception to Section 280.170(b) in which it argues that the timelines for reconnection of service are unnecessarily long. GCI BOE, p. 50. GCI propose to "shorten the reconnection time from four (for electric, water or sewer utilities) days to two days and from seven days (for natural gas utilities) to two days." GCI BOE, p. 51. The timelines for service restoration in the proposed rule are structured to mirror the service activation requirements under Section 280.30 Applications for Service. Staff Pos. St., p. 60. As the ALJPO recognized, the two day time frame advocated by GCI is simply not feasible due to the extreme weather and other conditions in Illinois. ALJPO, p. 221. The reconnection time

proposed by Staff, supported by the record, and adopted by the ALJPO should be maintained, and GCI's proposal rejected.

Ameren Illinois also opposes GCI's exception to Section 280.170(f) that the waivers to the reconnection timelines should be eliminated. GCI BOE, p. 51. Ameren Illinois supports the language proposed by Staff and adopted in the ALJPO because that language recognizes that "a waiver of the reconnection timelines" may be appropriate in "unanticipated" situations. ALJPO, p. 222. Contrary to GCI's argument, the exception would only be provided in limited circumstances – when the cause of the inability to meet the standards is "unforeseen" – and the rule requires that the utility justify application of the exception by notice to the Commission. ALJPO, Attachment, p. 51. The ALJPO's analysis and conclusions adopting Staff's recommended reconnection timelines is supported by the record and should be maintained, not changed as requested by GCI.

L. SUBPART L: UNAUTHORIZED SERVICE USAGE

1. Section 280.200 Tampering

(a) Reply to IAWC

For the reasons set forth above (Section 280.20 Definitions, "Tampering"), IAWC's position that the new rule should clearly provide that utilities be allowed to recoup losses caused by tampering with utility equipment or facilities should be adopted.

M. SUBPART M: COMPLAINT PROCEDURES

N. SUBPART N: INFORMATION

1. GCI's Proposal to Add Section 280.270 Annual Reporting to the Commission

(a) Reply to GCI

As noted in its Position Statement, Ameren Illinois opposes GCI's exception to its proposed Section 280.270 that utilities should be required to "collect certain information regarding the performance of the new rules." Ameren Pos. St., p. 19; GCI BOE, p. 54. Ameren Illinois agrees with Staff that additional periodic data reporting on the effects of Part 280 is unnecessary and would result in additional, unwarranted costs. Staff Pos. St., p. 67; Ameren Pos. St., p. 19. Staff is already entitled to obtain data and information from utilities, and it would add undue burden to require utilities to create and submit additional records before they are requested. Ameren Reply Br., p. 26. As there is no credible evidence cited by GCI or found in the record that the costs associated with additional reporting would be justified by an incremental benefit, the ALJPO should not be changed as requested by GCI.

III. CONCLUSION

For the reasons set forth above, as well as those set forth in Ameren Illinois' previous filings in this docket, the Commission should deny the requests to change the ALJPO as addressed herein and enter a Final Order consistent with the exceptions requested or supported by Ameren Illinois.

Dated: July 20, 2012

Respectfully submitted,

The Ameren Illinois Company

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CERTIFICATE OF SERVICE

I, the undersigned attorney, certify that on July 20, 2012, I served a copy of the foregoing
REPLY BRIEF ON EXCEPTIONS OF AMEREN ILLINOIS COMPANY by electronic mail to
the individuals on the Commission's Service List for the above captioned docket.

By: /s/ Mark W. DeMonte
Attorney for Ameren Illinois