

believes that the changes proposed by the IBEW are consistent with the relevant provisions of Public Act 97-0616 and Ameren Illinois' experience in working with distributed generation installers.

4. Public Act 97-0616, effective October 31, 2011, set the minimum requirements for the knowledge, skill, training and competence levels of distributed generation installers at levels comparable to those that were required of electric utility employees at the benchmark date of January 1, 2007. The changes proposed by the IBEW to the definition of "Qualified Person," and the removal of the "directly supervised" provisions of DG Installer Rule currently found in draft form at Section 468.60(d) reflect changes consistent with the knowledge, skill, training and competence levels required by the Ameren Illinois legacy companies in 2007, and are thus consistent with Public Act 97-0616.

5. Although Ameren Illinois understands Staff's desire to provide an alternative certification path based on installation experience, the Company is troubled with concerns as to how this provision will, or could be enforced. In specific, the alternative certification path is based "satisfactory completion" of prior distributed generation installations. The DG Installer Rule contains no definition of "satisfactory completion" nor provides any mechanism(s) to resolve conflicts that may arise over the requirement as applied. Based on Ameren Illinois' experience with the over 350 distributed generation installations since the implementation of Part 466 in 2008, the three parties generally involved in such installations (customers, installers and utilities) each have different criteria as to what constitutes a "satisfactory" installation.

6. In addition, it has also proven difficult to verify claims of satisfactory installations. Ameren Illinois is aware of one entity that has installed over 100 DG units over the past several years. Under the terms of the DG Installer Rule, this entity may be entitled to

installer certification. In practice, however, it is Ameren Illinois' belief that this entity has refused to follow both Part 466 of the Commission Rules, as well as mandates found in the National Electric Code. In addition, such entity has refused to provide Ameren Illinois with the names of customers for whom it has installed DG units, despite repeated requests by the Company for this and related information. This entity will no doubt claim the required number of satisfactory installations necessary to obtain certification under the alternative qualification prong of the DG Installer Rule; however, Ameren Illinois would have difficulty vouching for a single installation performed up to national standards and/or reflecting best practices.

WHEREFORE, Ameren Illinois Company d/b/a Ameren Illinois respectfully submits these comments for consideration and requests relief consistent with the opinions expressed herein.

Dated: December 27, 2012

Respectfully Submitted,

AMEREN ILLINOIS COMPANY

d/b/a Ameren Illinois

By 

Eric Dearmont
Associate General Counsel
AMEREN SERVICES COMPANY
1901 Chouteau Avenue
PO Box 66149 (MC 1310)
St. Louis, Missouri 63166-6149
314.554.3543, *direct*
314.554.4014, *facsimile*
edearmont@ameren.com

CERTIFICATE OF SERVICE

I, Eric Dearmont, Counsel for Ameren Illinois Company, hereby certify that a copy of the foregoing *Verified Reply Comments on the Proposed Rule Governing Distributed Generation Installer Certification* was filed on the Illinois Commerce Commission's e-Docket and was served electronically to all parties of record in this docket on this 27th day of December, 2012.

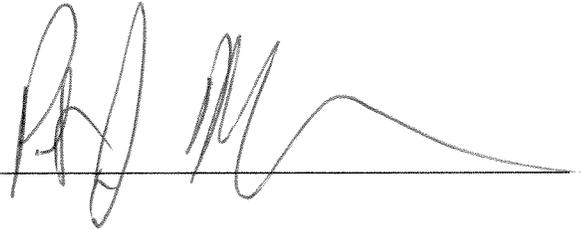


Eric Dearmont
Associate General Counsel
AMEREN SERVICES COMPANY

VERIFICATION

STATE OF MISSOURI)
) SS.
CITY OF SAINT LOUIS)

I, Peter J. Millburg, being first duly sworn, hereby state that: i) I am the Managing Supervisor of Regulatory Compliance for Ameren Illinois Company, ii) I am authorized to make this verification on its behalf; iii) I have knowledge of the facts stated in the foregoing pleading; and iv) the facts as stated are true and correct to the best of my knowledge, information, and belief.



Peter J. Millburg

SUBSCRIBED and SWORN to before me this 27th day of December, 2012.



Notary Public

