

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

ILLINOIS COMMERCE COMMISSION)	
On Its Own Motion)	
)	Docket Nos. 11-0354, 11-0355,
-vs-)	11-0356 (Cons.)
)	
AMEREN ILLINOIS COMPANY)	
d/b/a Ameren Illinois)	
)	
Reconciliation of revenues collected under)	
power procurement riders with actual costs)	
associated with power procurement)	
expenditures)	

[DRAFT] PROPOSED ORDER

By order of the Illinois Commerce Commission (“Commission”):

In this proceeding, on April 15, 2011, the Commission filed its Order Commencing Reconciliation Proceedings for the reconciliation period of June 1, 2009 through May 31, 2010 (“Reconciliation Period”). The purpose of this proceeding is to conduct the third round of investigations regarding the reconciliation of revenue collected under certain tariffs by the public utilities listed as Respondents in this proceeding. (Initiating Order at 3.) On February 28, 2012, the Administrative Law Judge (“ALJ”) granted the parties’ Agreed Motion to Consolidate Dockets, thus consolidating Docket Nos. 11-0354, 11-0355, and 11-0356.

On February 8, 2012, Ameren Illinois Company (“Ameren Illinois”)¹ filed Direct Testimony of Richard L. McCartney (Ameren Ex. 1.0); David J. Brueggeman (Ameren Ex. 2.0); Dominic S. Perniciaro (Ameren Ex. 3.0-3.11). On February 4, 2013, Ameren Illinois filed Rebuttal Testimony of Mr. Perniciaro (Ameren Ex. 4.0); Revised Ameren Exhibit 3.11, Rebuttal Testimony of Richard L. McCartney (Ameren Ex. 5.0); and Rebuttal Testimony of Leonard M. Jones (Ameren Ex. 6.0). On March 27, 2013, Ameren Illinois filed Surrebuttal Testimony of Mr. Perniciaro (Ameren Ex. 7.0-7.1) and Leonard M. Jones (Ameren Ex. 8.0).

On April 11, 2013, Ameren Illinois filed the following affidavits: Affidavit of David J. Brueggeman (Ameren Ex. 2.1); Affidavit of Richard L. McCartney (Ameren Ex. 5.1); Affidavit of Dominic S. Perniciaro (Ameren Ex. 7.2); and Affidavit of Leonard M. Jones (Ameren Ex. 8.1).

¹ Ameren Illinois Company d/b/a Ameren Illinois was created in 2010 from the merger of Central Illinois Light Company d/b/a AmerenCILCO, Central Illinois Public Service Company d/b/a Ameren-CIPS, and Illinois Power Company d/b/a AmerenIP.

On November 29, 2012, Staff filed Direct Testimony of Theresa Ebrey (Staff Ex. 1.0). On March 12, 2013, Staff filed Rebuttal Testimony of Ms. Ebrey (Staff Ex. 2.0). On April 9, 2013, Staff filed the Affidavit of Theresa Ebrey (Staff Ex. 3.0).

Pursuant to due notice given in accordance with the law and the rules and regulations of the Commission, pre-hearing conferences were held before a duly authorized ALJ of the Commission at its offices in Springfield, Illinois on November 16, 2011; February 29, 2012; and February 14, 2013. An evidentiary hearing was held on April 11, 2013. At the evidentiary hearing, attorneys from Ameren Illinois and Staff appeared, Staff Exhibits 1.0, 2.0 and 3.0, and Ameren Exhibits 1.0, 2.0, 2.1, 3.0, 3.1 through 3.10, 4.0, 5.0, 5.1, 6.0, 7.0 through 7.2, 8.0, and 8.1 were entered into evidence without objection. At the hearing it was confirmed that Ameren Illinois and Staff were in agreement on the reconciliation statements at issue in this docket. The record was marked heard and taken on April 11, 2013.

Background

As explained in the Initiating Order (“Initiating Order”) in the current dockets, the final order entered on January 24, 2006 in Docket No. 05-0160/0161/0162 (Cons.) (“Procurement Docket”) approved, with modifications, the initial series of tariffs and riders under which the three Ameren Illinois Utilities (“AIUs”) – Central Illinois Light Company d/b/a/ AmerenCILCO, Central Illinois Public Service Company d/b/a AmerenCIPS, and Illinois Power Company d/b/a/ AmerenIP – would purchase and deliver electricity to their customers following the expiration of the mandatory rate freeze on January 1, 2007. Among the approved tariffs for each company was Rider MV, which stated that the charges and adjustments calculated under the rider were subject to adjustment in accordance with “annual docketed reconciliation proceedings as provided for” in the January 24, 2006 order. The retail charges computed in accordance with these riders applied to service provided on and after January 2, 2007. These tariffs were later superseded by new provisions, which the Commission approved in a final order entered on December 19, 2007, in Docket No. 07-0527.

Rider MVA – Market Value Adjustment, also approved in Docket No. 07-0527, allowed the AIUs to address market value adjustments for fixed-price customers for service provided through the end of May 2008.

Rider PER – Purchased Electricity Recovery, also approved in Docket No. 07-0527, provided for the calculation of retail charges in accordance with the new tariffs that became operational and are applicable to service provided on and after June 1, 2008. Rider PER also requires an annual reconciliation.

Rider HSS – Hourly Supply Service, also approved in Docket No. 07-0527, provided for the calculation of hourly retail charges in accordance with the new tariffs that became operational and are applicable to service provided on and after June 1, 2008. Rider HSS also requires an annual reconciliation.

The three AIUs were merged into one entity after the reconciliation period involved here. Because the Ameren utilities were operating as separate entities during the reconciliation period

and had their own revenues and costs during that time, a separate proceeding is necessary for each utility.

The Initiating Order directed each utility listed as a Respondent in this proceeding to reconcile revenue collected under each of the above-named tariffs, or under related provisions filed pursuant to the orders cited and authorizing the recovery of power supply costs for the reconciliation period, with costs incurred in connection with procurement activities as defined in the tariffs of each utility. The Initiating Order further directed each utility to include a schedule presenting cumulative totals of incremental costs and cumulative totals of recoveries, by wholesale product, to the extent such information is reasonably available.

The Initiating Order further directed each utility to address in testimony specifically how it complied with the applicable procurement plan approved by the Commission for the period under review. Each utility was requested to include a summary schedule detailing the internal administrative and operational costs associated with the procurement of electric power and energy for retail customers during the period under review. Finally, the Initiating Order directed each utility to provide in testimony a conclusion about the reasonableness of these costs and the basis for that conclusion.

Procurement of Supply During the Reconciliation Period

As noted above, Ameren Illinois filed testimony of four witnesses, two of whom addressed the topic of how the utilities procured power supply during the Reconciliation Period. Mr. McCartney described the planning process prior to supply procurement activities for two different types of customers. (Ameren Ex. 1.0.) First, for customers on the Company's fixed price tariff (Basic Generation Service rider or "Rider BGS"), the planning process involved Ameren Illinois providing load forecasts to the Illinois Power Agency ("IPA") to include in its IPA Procurement Plan, which was filed with the Commission on October 28, 2008 in Docket No. 08-0519. (Ameren Ex. 1.0 at 76-116.) On January 9, 2009, the Commission accepted the Plan with certain modifications, but made no modifications with respect to the forecast provided by Ameren Illinois.

Second, Mr. McCartney described both the planning process and supply procurement activities for customers on the Company's real time pricing tariffs (Real Time Pricing rider or "Rider RTP," and Hourly Supply Service rider or "Rider HSS"), and the prudence of the Company's efforts to obtain power supply for such customers at a reasonable cost. (Ameren Ex. 1.0 at 117-77.) For customers on Rider RTP and Rider HSS, Ameren Illinois created forecasts using three primary sources: billing data, historical hourly consumption data, and letters of intent associated with the summer notification process identified in Rider HSS. The resulting forecasts were used to estimate the monthly capacity requirements and daily energy requirements for customers on Rider RTP and Rider HSS.

The second Ameren Illinois witness who testified regarding procurement was Mr. Brueggeman, who presented details regarding the power supply procurement process pertaining to Rider BGS which resulted from two separate procurement events. (Ameren Ex. 2.0 at 43-56.) For approximately 1/3 of the power supply requirements, the previously approved but no longer

in effect Illinois Auction procurement process was used, and for approximately 2/3 of the power supply requirements, the now in effect IPA procurement process was used.

Mr. Brueggeman also described the process by which Ameren Illinois entered contracts with suppliers. (Ameren Ex. 2.0 at 71-97.) On March 9, 2009, the IPA notified the Commission that it had selected Levitan Associates Inc. (“LAI”) to serve as the Procurement Administrator for the 2009 procurement cycle for the AIUs’ procurement requirements. On March 11, 2009, the Commission voted to accept the IPA’s selection of LAI as Procurement Administrator. Consistent with the PUA, LAI issued a request for proposal (“RFP”) to procure the capacity, energy, and Renewable Energy Credits (“RECs”) identified in the Commission-approved procurement plan. In each case, LAI followed the prescribed process laid out in the PUA when designing the process, submitting the required confidential reports, and providing recommendations to the Commission following each RFP process. Following the conclusion of each RFP, the AIUs entered into contracts with the winning suppliers identified in LAI’s recommendation made to, and approved by, the Commission.

Testimony Regarding Prudence

Three Ameren Illinois witnesses testified regarding the prudence of the Company’s procurement efforts. First, Mr. McCartney testified that the Company’s efforts to obtain power supply for customers on the Company’s Rider RTP and Rider HSS were prudent, and were undertaken at a reasonable cost. (Ameren Ex. 1.0 at 167-77.) Mr. McCartney confirmed in his Rebuttal Testimony (Ameren Ex. 5.0 at 17-41) that Ameren Illinois has complied with the Commission’s Initiating Order in this docket, which required that utilities address in testimony how they complied with the applicable IPA Procurement Plan approved by the Commission for the period under review.

Second, Mr. Jones testified that, during the Reconciliation Period, Ameren Illinois acted reasonably and prudently with respect to internal operating and administrative expenses under Rider PER and Rider HSS because it acted in accordance with the prior Commission orders. (Ameren Ex. 6.0 at 83-86.)

Third, Mr. Brueggeman testified that Ameren Illinois complied with the procurement plan approved by the Commission and the Company has performed all prudent acts in a manner consistent with the law and the Commission’s order in Docket 08-0519 (Petition for Approval of Initial Procurement Plan). (Ameren Ex. 2.0 at 145-69.) He also testified that the costs incurred under Rider PER (costs that pertain to Rider BGS) are reasonable.

Reconciliation of Costs and Revenues

Reconciliations of costs and revenues for each AIU were presented for the 12 months ending May 31, 2010, as explained by Ameren Illinois witness Mr. Perniciaro, Supervisor –

Power Accounting for Ameren Services Company, a services company affiliate of Ameren Illinois. He sponsored Ameren Exhibit 3.0 and Ameren Exhibits 3.01-3.11.²

Ameren Exhibits 3.01, 3.02 and 3.03, as they are labeled, show the recovery of the Company's total allowable costs over the 12-month reconciliation period ending May 31, 2010 for the fixed price product, Basic Generation Service – Fixed Price (“BGS-FP”), and hourly price for small customer products (“RTP”) under Rider PER. (Ameren Ex. 3.0 at 53-57.) Ameren Exhibits 3.04, 3.05 and 3.06 show the recovery of the Company's total allowable costs over the twelve-month reconciliation period ending May 31, 2010 for the hourly price product for large customers under Rider HSS. Ameren Exhibits 3.07, 3.08 and 3.09 summarize the Company's total allowable costs over the twelve-month reconciliation period ending May 31, 2010 under Riders PER and HSS and the Factor O requested by Ameren Illinois based upon the proposed adjustments. Ameren Exhibit 3.10 shows the amounts filed for each recovery period since January 2007 compared to how they should have been reported and the resulting variance. Ameren Exhibit 3.11 is a schedule of the internal administrative and operational costs associated with procuring electric power and energy for retail customers over the twelve month reconciliation period ending May 31, 2010.

Mr. Perniciaro described generally the tariffs that provide service to customer groups and how they relate to the various purchased power and energy products. (Ameren Ex. 3.0 at 82-99.) There are three different products procured for customers that choose to take power from Ameren Illinois: fixed price, small hourly price, and large hourly price. The fixed price product, BGS-FP, is procured under Rider PER. During the reconciliation period, BGS-FP was available to customers with demands under 400 kW, although customers with demands between 400 kW and 1,000 kW had been declared competitive and were in a transition period whereby they could stay on BGS-FP so long as they did not take supply from Alternative Retail Suppliers (“ARES”) or Rider HSS. RTP is the real-time hourly pricing product for small customers, with approximately one-third of supply coming from Supplier Fixed Contracts (“SFCs”) associated with the 2006 Illinois Auction and approximately two-thirds of supply coming from the Midwest Independent Transmission System Operator (“MISO”) market. In both cases, customers under RTP were charged MISO Locational Marginal Prices (“LMPs”) for energy and both BGS-FP and RTP were recovered under Rider PER. The HSS product is the “Hourly Supply Service” to allow customers with demands equal to or greater than 400 kW to elect real-time hourly pricing under Rider HSS.

Mr. Perniciaro explained that all customer categories do not incur all the above-described costs. Below is a list of each applicable cost source cross-referenced to the service category to which it applies:

Auction Suppliers: BGS-FP; RTP
MISO Energy Costs: BGS-FP; RTP; HSS
MISO Market Settlement: BGS-FP; RTP; HSS
Rider QF Costs: BGS-FP; RTP

² The corrected version of Ameren Exhibit 3.11 was subsequently filed as Ameren Exhibit 7.1. Correction was necessary to correct inadvertent mislabeling, as explained in Ameren Exhibit 7.0.

Ancillary Services: BGS-FP; RTP; HSS
Capacity: BGS-FP; RTP; HSS
Company Use & Free Service under Franchises: BGS-FP; RTP

(Ameren Ex. 3.0 at 123-26.)

Mr. Perniciaro also identified adjustments made in the reconciliation. (Ameren Ex. 3.0 at lines 131-179.) There was an accounting adjustment. Internal analysis conducted in December of 2009 discovered that a tie-line meter between two legacy utilities, AmerenCIPS and AmerenIP, had the sign reversed since June 4, 2009. Once the error was discovered, settlement data provided to MISO had been corrected; however, MISO only accepts corrections up to 105 days. Thus, data back to September 10 had been corrected, but settlement data accepted at MISO for the period from June 4 – September 9 still reflects the tie-line meter sign reversal. A “shadow” settlement estimate that Ameren Illinois would provide to MISO if resettlement were to be allowed for the mentioned period was created by the load settlement personnel to determine the MWHs in question on an hourly basis. The hourly MWHs were priced at the hourly real-time LMPs and aggregated. The result is approximately 183,721 MWH and \$7,187,828 will be taken from AmerenCIPS and given to AmerenIP. In other words, AmerenCIPS costs have been lowered and AmerenIP costs have been increased by an offsetting amount – as if a MISO settlement had been accepted for June 4 – September 9.

Internal analysis conducted in October of 2010 found that some Ameren Illinois revenue was not being included in Rider HSS recoveries because the customer billing system characterized the billings as miscellaneous (rather than Rider) revenue. (Ameren Ex. 3.0 at 148-52.) The issue resulted in Rider HSS under reporting revenues and an over recovery of \$6,619,363.01 from June 2008 through June 2010. Of this total, \$585,403.10 of the over-recovered amount related to the reconciliation period from June 2010 through May 2011 and was included as a Factor A in the January 2011 filing. \$2,340,856.16 of the over-recovered amount related to the reconciliation period from June 2008 through May 2010 and will be included as a Factor A upon their order in Docket Nos. 10-0272, 10-0273, and 10-0274. The remaining over-recovered amount of \$3,693,103.75 relates to the reconciliation period from June 2009 through May 2010:

AmerenCIPS: \$1,191,872.42 for the period from June 2009 – May 2010

AmerenCILCO: \$450,530.27 for the period from June 2009 – May 2010

AmerenIP: \$2,050,701.06 for the period from June 2009 – May 2010

(Ameren Ex. 3.0 at 161-63.)

Once identified, these amounts were determined by summarizing the general ledger for this specific revenue. During the reconciliation process, it was determined that \$9,574.34 in sales were made to City Water, Light, and Power (“CWLP”) according to a boundary line agreement with AmerenCILCO and not included as revenue in Rider PER. These sales are typically the result of emergency situations and/or non-recurring in nature. In addition, internal analysis conducted in January of 2011 determined that the work papers calculating the unamortized balance in the filings had a flaw that resulted in a reduction in said balance at a

quicker pace than the general ledger. This resulted in an over-recovered balance, in aggregate, in the general ledger compared to the unamortized balance in the filing. Ameren Exhibit 3.7 indicates the amount per Rate Zone and reconciliation period for the periods from January 2007 through the most current filing. Staff was notified of the issue in February of 2011 and it was corrected in the March 2011 filing in order to correct the balances as quickly as possible to reflect the calculation correction in the work papers.

Another Ameren Illinois witness, Mr. Jones, explained the process of how internal administrative and operational costs associated with Power Supply activities are recovered from customers. (Ameren Ex. 6.0.) He testified that only the amounts pre-approved by the Commission in prior proceedings are recovered from customers under the provisions of Rider PER and Rider HSS.

Mr. Jones also addressed Staff's position with respect to new language for Rider PER and Rider HSS that would allow for a prospective reconciliation. (Ameren Ex. 8.0 at 51-119.) Mr. Jones' testimony included proposed language to address Staff's recommendation. The Company agreed with the spirit of the language proposed by Staff, but recommended adjusting it to reflect the status of other reconciliation proceedings. Specifically, the Company recommended that the language reflect that reconciliation schedules have not yet been filed in Docket No. 12-0548 (the proceeding to address reconciliation for the June 2010 through May 2011 period). Mr. Jones' testimony also set forth proposed language to address how any over or under recovery of procurement administrative costs would be passed through to customers. Ameren Illinois agreed with Staff that the issues regarding proposed tariff language need not be fully resolved prior to the approval of the reconciliation provided in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC. The Company is committed to working with Staff on proposed tariff revisions and will submit a separate filing seeking Commission approval. Revisions identified by both Staff and the Company will be prospective and will not affect this reconciliation.

Staff Recommendation

On behalf of the Commission, Ms. Ebrey, an Accountant in the Accounting Department of the Financial Analysis Division of the Commission, offered testimony, Staff Exhibit 1.0, with attached Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC. Schedule 1.01 for each utility presents a summary of the reconciliation per Staff for the various components of Rider PER and Rider HSS. In addition, each Schedule 1.01 presents the Ameren Illinois reconciliation of each product, adjustments, and the resulting Staff reconciliation. Ms. Ebrey noted the agreement between Staff and Ameren Illinois with respect to the reconciliation amounts included in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC.

In her Direct Testimony, Ms. Ebrey proposed several adjustments to correct certain allocation errors discovered by the Company during the preparation of the response to Staff data request ("DR") TEE 1.10. (Staff Ex. 1.0 at 38-44.) Subsequently, the Company corrected the calculations and provided the supplemental response to Staff DR 1.10 on May 7, 2012. Ms. Ebrey's schedules reflect the adjustment amounts contained on the Company's response to TEE 1.10S.

In her Rebuttal Testimony, Ms. Ebrey proposed several tariff revisions. (Staff Ex. 2.0 at 34-50.) Her suggested revisions would provide for prospective reconciliation of the procurement costs included in Riders PER and HSS, periodic revisions of the Procurement Adjustment rate, and an explanation of how any over or under recovery will be passed through to ratepayers. Ms. Ebrey, however, testified that not all of the issues related to tariff revisions must be fully resolved prior to the approval of the reconciliation provided in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC attached to her Direct Testimony. Therefore, she recommended that the Commission approve the reconciliation as recommended with the assurance that the issues raised concerning the procurement costs will be resolved in the near future. (Staff Ex. 2.0 at 96-107.)

Ameren Illinois witness Mr. Perniciaro agreed with adjustments proposed by Staff and recommended that the Commission approve amounts shown in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC attached to Staff's Direct Testimony. (Ameren Ex. 4.0.)

Commission's Conclusions, Findings and Ordering Paragraphs

In the instant docket, the Initiating Order directed each utility listed as a Respondent in this proceeding to "reconcile revenue collected under each of the above-named tariffs, or under related provisions filed pursuant to the orders cited and authorizing the recovery of power supply costs for the reconciliation period, with costs incurred in connection with procurement activities as defined in the tariffs of each utility." (Initiating Order at 3.)

The Commission concludes that the testimony filed in this proceeding supports a finding that Staff and Ameren Illinois are in agreement on the issues in this docket. The record further supports a finding that, for the Reconciliation Period of June 1, 2009 through May 31, 2010 ("Reconciliation Period"), Ameren Illinois acted prudently in obtaining the power supply products needed to satisfy the needs of its customers taking service on the Company's fixed price tariff (Rider BGS) and the Company's real time pricing tariffs (Rider RTP and Rider HSS). Furthermore, Ameren Illinois' procurement activities for customers on all tariffs were conducted at a reasonable cost.

The Commission also finds that reconciliations of procurement costs and revenues as set forth in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC, attached to Staff's Direct Testimony, are accurate and are approved by the Commission. For AmerenCILCO, recoverable procurement costs were \$156,770,536 and revenues were \$164,915,262. For AmerenCIPS, recoverable procurement costs were \$354,233,802 and revenues were \$358,229,579. For AmerenIP, recoverable procurement costs were \$466,929,186 and revenues were \$483,486,420.

Having reviewed the record, and being fully advised in the premises, the Commission finds that:

- 1) during the Reconciliation Period, the AIUs were Illinois corporations engaged in the transmission, distribution, and sale of electricity to the public in Illinois and were public utilities within the meaning of Section 3-105 of the Public Utilities Act;
- 2) the Commission has jurisdiction over the parties and the subject matter of this proceeding;

- 3) the statements of fact set forth in the prefatory portion of this Order are supported by the record and are hereby adopted as findings of fact;
- 4) Ameren Illinois acted reasonably and prudently in its recovery of costs pursuant to Riders PER and HSS for the Reconciliation Period of June 1, 2009 through May 31, 2010;
- 5) the reconciliation statements of Riders PER and HSS for the Reconciliation Period, as set forth in Schedules 1.01 CILCO, 1.01 CIPS, and 1.01 IPC, filed as part of Staff Exhibit 1.0 (attached hereto as Appendices A, B, and C), are approved;
- 6) for AmerenCILCO, recoverable procurement costs were \$156,770,536 and revenues were \$164,915,262; for AmerenCIPS, recoverable procurement costs were \$354,233,802 and revenues were \$358,229,579; for AmerenIP, recoverable procurement costs were \$466,929,186 and revenues were \$483,486,420;
- 7) at May 31, 2010 AmerenCILCO had an over-recovered balance \$27,161,965, of which \$7,233,201 had been amortized as Factor A adjustments; AmerenCIPS had an over-recovered balance of \$19,498,080 of which \$6,950,798 had been amortized as Factor A adjustments; AmerenIP had an over-recovered balance of \$24,083,765 of which \$9,284,394 had been amortized as Factor A adjustments;
- 8) for the Reconciliation Period, Ameren Illinois shall refund \$407,794 for AmerenCILCO customers; \$1,104,136 for AmerenCIPS customers; and \$2,190,754 for AmerenIP customers as Factor O refunds in the first monthly Rider PER and Rider HSS informational filings after the date of the Order in this docket.

IT IS THEREFORE ORDERED that for reporting period June 1, 2009 through May 31, 2010, the reconciliation of revenues collected under the above referenced Riders PER and HSS with actual costs incurred in connection with uncollectibles expense as defined therein, as shown in Staff Exhibit 1.0 (Schedules 1.01 CILCO, 1.01 CIPS, 1.01 IPC), and as attached to this Order as Appendices A, B, and C, are hereby approved.

IT IS FURTHER ORDERED that subject to the provisions of Section 10-113 of the Public Utilities Act and 83 Ill. Adm. code 200.880, this Order is final; it is not subject to the Administrative Review Law.

By order of the Commission this ___ day of _____, 2013.

Dated: May 17, 2013

Respectfully submitted,

AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois

By: /s/ Mark W. DeMonte
Mark W. DeMonte
JONES DAY
77 W. Wacker Drive
Chicago, IL 60601-1692
Telephone: (312) 782-3939
Facsimile: (312) 782-8585
mdemonte@jonesday.com

Edward C. Fitzhenry
Matthew R. Tomc
Ameren Services Company
One Ameren Plaza
1901 Chouteau Avenue
St. Louis, Missouri 63166
(314) 554-3533 (voice)
(314) 554-4014 (fax)
efitzhenry@ameren.com
mtomc@ameren.com

CERTIFICATE OF SERVICE

I, Mark W. DeMonte, an attorney, on oath state that, after circulating a copy of the [Draft] Proposed Order for comment, I filed and served a copy of the above document on the service list maintained on the Illinois Commerce Commission's e-Docket system for Docket Nos. 11-0354, 11-0355, and 11-0356 via electronic delivery on May 17, 2013.

Dated: May 17, 2013

/s/ Mark W. DeMonte
Mark W. DeMonte

APPENDIX A

CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO
Power Procurement Reconciliation
For the Period Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>HSS</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (11,372,674)	\$ 1,595,036	\$ (9,777,638)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-	(1,919,347)	(1,919,347)
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(429,695)	(867,633)	(1,297,328)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	<u>\$ (11,802,369)</u>	<u>\$ (1,191,944)</u>	<u>\$ (12,994,313)</u>
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	150,305,293	6,465,243	156,770,536
6	2009 - 2010 PER Revenues	(157,676,722)	(7,238,540)	(164,915,262)
7	Separately Reported 2009 - 2010 Other Adjustments	-	-	-
8	March 2011 Factor A Adjustments	(6,293,888)	309,032	(5,984,856)
9	Monthly Interest at 1.0% in 2009	(38,492)	422	(38,070)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	<u>\$ (13,703,809)</u>	<u>\$ (463,843)</u>	<u>\$ (14,167,652)</u>
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	<u><u>\$ (25,506,178)</u></u>	<u><u>\$ (1,655,787)</u></u>	<u><u>\$ (27,161,965)</u></u>
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(7,126,832)	(106,369)	(7,233,201)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(17,510,236)	1,205,941	(16,304,295)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-	(1,919,347)	(1,919,347)
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(429,695)	(867,633)	(1,297,328)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	<u>(439,415)</u>	<u>31,621</u>	<u>(407,794)</u>
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	<u><u>\$ (25,506,178)</u></u>	<u><u>\$ (1,655,787)</u></u>	<u><u>\$ (27,161,965)</u></u>

CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO
Power Procurement Reconciliation
For the Period Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (11,372,674)		\$ (11,372,674)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-		-
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(429,695)		(429,695)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	\$ (11,802,369)	\$ -	\$ (11,802,369)
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	150,284,603	20,690 1	150,305,293
6	2009 - 2010 PER Revenues	(157,676,722)		(157,676,722)
7	Separately Reported 2009 - 2010 Other Adjustments	-		-
8	March 2011 Factor A Adjustments	(6,293,888)		(6,293,888)
9	Monthly Interest at 1.0% in 2009	(38,492)		(38,492)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	\$ (13,724,499)	\$ 20,690	\$ (13,703,809)
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	\$ (25,526,868)	\$ 20,690	\$ (25,506,178)
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(7,126,832)	-	(7,126,832)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(17,510,236)		(17,510,236)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-	-	-
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(429,695)	-	(429,695)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	(460,105)	20,690	(439,415)
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	\$ (25,526,868)	\$ 20,690	\$ (25,506,178)

1 Company response to TEE 1.10S Attach, p. 13

CENTRAL ILLINOIS LIGHT COMPANY d/b/a AmerenCILCO
Power Procurement Reconciliation
For the Period Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>HSS</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ 1,595,036		\$ 1,595,036
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	(1,919,347)		(1,919,347)
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(867,633)		(867,633)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	\$ (1,191,944)	\$ -	\$ (1,191,944)
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	6,433,621	31,622	6,465,243
6	2009 - 2010 PER Revenues	(7,238,540)		(7,238,540)
7	Separately Reported 2009 - 2010 Other Adjustments	-		-
8	March 2011 Factor A Adjustments	309,032		309,032
9	Monthly Interest at 1.0% in 2009	422		422
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	\$ (495,465)	\$ 31,622	\$ (463,843)
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	\$ (1,687,409)	\$ 31,622	\$ (1,655,787)
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(106,369)		(106,369)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	1,205,941		1,205,941
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	(1,919,347)		(1,919,347)
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(867,633)		(867,633)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	(1)	31,622	31,621
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	\$ (1,687,409)	\$ 31,622	\$ (1,655,787)

1 Company response to TEE 1.10S Attach, p. 13

APPENDIX B

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS
Power Procurement Reconciliation
For the Year Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>HSS</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (5,873,828)	\$ (703,705)	\$ (6,577,533)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	64	-	64
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(731,036)	(1)	(731,037)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	<u>\$ (6,604,800)</u>	<u>\$ (703,706)</u>	<u>\$ (7,308,506)</u>
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	339,566,534	14,667,268	354,233,802
6	2009 - 2010 PER Revenues	(342,876,886)	(15,352,693)	(358,229,579)
7	Separately Reported 2009 - 2010 Other Adjustments	(7,187,828)	-	(7,187,828)
8	March 2011 Factor A Adjustments	(1,040,468)	47,894	(992,574)
9	Monthly Interest at 1.0% in 2009	(13,068)	(327)	(13,395)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	<u>\$ (11,551,716)</u>	<u>\$ (637,858)</u>	<u>\$ (12,189,574)</u>
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	<u>\$ (18,156,516)</u>	<u>\$ (1,341,564)</u>	<u>\$ (19,498,080)</u>
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(6,624,326)	(326,472)	(6,950,798)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(9,657,458)	(1,054,715)	(10,712,173)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	64	-	64
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(731,036)	(1)	(731,037)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	<u>(1,143,760)</u>	<u>39,624</u>	<u>(1,104,136)</u>
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	<u>\$ (18,156,516)</u>	<u>\$ (1,341,564)</u>	<u>\$ (19,498,080)</u>

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS
Power Procurement Reconciliation
For the Year Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	(\$5,873,828)		(\$5,873,828)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	64		64
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(731,036)		(731,036)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	(\$6,604,800)	\$0	(\$6,604,800)
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	339,518,421	48,113 1	339,566,534
6	2009 - 2010 PER Revenues	(342,876,886)		(342,876,886)
7	Separately Reported 2009 - 2010 Other Adjustments	(7,187,828)		(7,187,828)
8	March 2011 Factor A Adjustments	(1,040,468)		(1,040,468)
9	Monthly Interest at 1.0% in 2009	(13,068)		(13,068)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	(\$11,599,829)	\$48,113	(\$11,551,716)
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	(\$18,204,629)	\$48,113	(\$18,156,516)
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(6,624,326)	-	(6,624,326)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(9,657,458)		(9,657,458)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	64	0	64
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(731,036)	0	(731,036)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	(1,191,873)	48,113	(1,143,760)
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	(\$18,204,629)	\$48,113	(\$18,156,516)

1 Company response to TEE 1.10S Attach, p. 13

CENTRAL ILLINOIS PUBLIC SERVICE COMPANY d/b/a AmerenCIPS
Power Procurement Reconciliation
For the Year Ended May 31, 2010

<u>Line No.</u>	<u>Description</u> (a)	<u>HSS</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	(\$703,705)		(703,705)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-		0
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1)		(1)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	(\$703,706)	\$0	(\$703,706)
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	14,627,644	39,624 1	14,667,268
6	2009 - 2010 PER Revenues	(15,352,693)		(15,352,693)
7	Separately Reported 2009 - 2010 Other Adjustments	\$0		0
8	March 2011 Factor A Adjustments	47,894		47,894
9	Monthly Interest at 1.0% in 2009	(327)		(327)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	(677,482)	\$39,624	(\$637,858)
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	(\$1,381,188)	\$39,624	(\$1,341,564)
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(326,472)		(326,472)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(1,054,715)		(1,054,715)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-		-
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1)		(1)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	-	39,624	39,624
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	\$ (1,381,188)	\$ 39,624	\$ (1,341,564)

1 Company response to TEE 1.10S Attach, p. 13

APPENDIX C

**Illinois Power COMPANY d/b/a AmerenIP
 Power Procurement Reconciliation
 For the Year Ended May 31, 2010**

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>HSS</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (4,047,274)	\$ (304,105)	\$ (4,351,379)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)		(31)	(31)
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1,536,616)	-	(1,536,616)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	<u>\$ (5,583,890)</u>	<u>\$ (304,136)</u>	<u>\$ (5,888,026)</u>
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	458,116,622	8,812,564	466,929,186
6	2009 - 2010 PER Revenues	(474,178,063)	(9,308,357)	(483,486,420)
7	Separately Reported 2009 - 2010 Other Adjustments	7,187,828	-	7,187,828
8	March 2011 Factor A Adjustments	(9,364,963)	571,472	(8,793,491)
9	Monthly Interest at 1.0% in 2009	(35,642)	2,800	(32,842)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	<u>\$ (18,274,218)</u>	<u>\$ 78,479</u>	<u>\$ (18,195,739)</u>
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	<u><u>\$ (23,858,108)</u></u>	<u><u>\$ (225,657)</u></u>	<u><u>\$ (24,083,765)</u></u>
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(9,699,903)	415,509	(9,284,394)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(10,583,214)	(488,756)	(11,071,970)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-	(31)	(31)
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1,536,616)	-	(1,536,616)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	<u>(2,038,375)</u>	<u>(152,379)</u>	<u>(2,190,754)</u>
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	<u><u>\$ (23,858,108)</u></u>	<u><u>\$ (225,657)</u></u>	<u><u>\$ (24,083,765)</u></u>

**Illinois Power COMPANY d/b/a AmerenIP
 Power Procurement Reconciliation
 For the Year Ended May 31, 2010**

<u>Line No.</u>	<u>Description</u> (a)	<u>PER</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (4,047,274)		\$ (4,047,274)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-		-
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1,536,616)		(1,536,616)
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	<u>\$ (5,583,890)</u>	<u>\$ -</u>	<u>\$ (5,583,890)</u>
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	458,104,293	12,329 1	458,116,622
6	2009 - 2010 PER Revenues	(474,178,063)		(474,178,063)
7	Separately Reported 2009 - 2010 Other Adjustments	7,187,828		7,187,828
8	March 2011 Factor A Adjustments	(9,364,963)		(9,364,963)
9	Monthly Interest at 1.0% in 2009	(\$35,642)		(\$35,642)
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	<u>\$ (18,286,547)</u>	<u>\$ 12,329</u>	<u>\$ (18,274,218)</u>
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	<u>\$ (23,870,437)</u>	<u>\$ 12,329</u>	<u>\$ (23,858,108)</u>
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	(9,699,903)	-	(9,699,903)
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(10,583,214)		(10,583,214)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	-	-	-
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	(1,536,616)	-	(1,536,616)
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	<u>(2,050,704)</u>	<u>12,329</u>	<u>(2,038,375)</u>
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	<u>\$ (23,870,437)</u>	<u>\$ 12,329</u>	<u>\$ (23,858,108)</u>

1 Company response to TEE 1.10S Attach, p. 13

Illinois Power COMPANY d/b/a AmerenIP
 Power Procurement Reconciliation
 For the Year Ended May 31, 2009

<u>Line No.</u>	<u>Description</u> (a)	<u>HSS</u> (b)	<u>Adjustments per Staff</u> (c)	<u>Total</u> (d)
PER Under/(Over) Recovery From Prior Years				
1	Under/(Over) Recovery from Prior Years (10-0272/0273/0274)	\$ (304,105)		\$ (304,105)
2	Factor O 09-0077/0078/0079 (Order 12/15/2010)	(31)		(31)
3	Factor O 10-0272/0273/0274 (Order 8/15/2012)	-		0
4	Under/(Over) Recovery from Prior Years (sum of lines 1 through 3)	<u>\$ (304,136)</u>	<u>\$ -</u>	<u>\$ (304,136)</u>
PER Under/(Over) Recovery From Current Year				
5	2009 - 2010 PER Recoverable Costs	8,964,942	(152,378) 1	8,812,564
6	2009 - 2010 PER Revenues	(9,308,357)		(9,308,357)
7	Separately Reported 2009 - 2010 Other Adjustments	\$0		0
8	March 2011 Factor A Adjustments	571,472		571,472
9	Monthly Interest at 1.0% in 2009	2,800		2,800
10	Under/(Over) Recovery from Current Year (sum of lines 5 through 9)	<u>\$ 230,857</u>	<u>\$ (152,378)</u>	<u>\$ 78,479</u>
11	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 4 and 10)	<u>\$ (73,279)</u>	<u>\$ (152,378)</u>	<u>\$ (225,657)</u>
Disposition of Cumulative Under/(Over) Recovery				
12	Total Adjustments To Electric Costs (Amortized Portion) Included In Monthly PER Filings	415,509		415,509
13	Unamortized Balance, End of Reconciliation Year (May 31, 2010)	(488,756)		(488,756)
14	Factor O 09-0077/0078/0079 (Order 12/15/2010)	(31)		(31)
15	Factor O 10-0272/0273/0274 (Order 8/15/2012)	-		-
16	Factor O Collection/(Refund) (line 11 - line 12 - line 13 - line 14 - line 15)	<u>(1)</u>	<u>(152,378)</u>	<u>(152,379)</u>
17	Cumulative Under/(Over)Recovery For Reconciliation Year (sum of lines 12 through 16)	<u>\$ (73,279)</u>	<u>\$ (152,378)</u>	<u>\$ (225,657)</u>

1 Company response to TEE 1.10S Attach, p. 13