

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/29/2013**

AG 12.06

Please provide a complete copy of the Company's Division, RMC and RMC Rollup hierarchy for all Ameren entities that have forecasted costs included in test year AIC gas expenses.

RESPONSE

**Prepared by: Michael J. Getz
Title: Controller, Ameren Illinois
Phone Number: 309-677-5111**

See AG 12.06 Attach.

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7		
S02 - ILLINOIS REGULATED OPS	D25 - ILLINOIS REGULATED OPS	F53 - ILLINOIS OPERATIONS	DOPS - DISTRIBUTION CONTROL OPERATIONS	DCI - DISTRIBUTION CONTROL ILLINOIS	107 - DISTRIBUTION OPS TECHNOLOGY		
					195 - DIST CONTROL ADMIN AND RELIABILITY		
					629 - DISTRIBUTION OPERATING-Peoria		
					91P - DISTRIBUTION OPERATING-DECATUR		
			IETS - ILL ELEC TECH SVCS	IAP - ITS ADMIN & PROJECTS	675 - ITS ADMINISTRATION		
					PED - DIST PLANNING, ENGR & DRAFTING	688 - DISTR PLANNING & ASSET PERF IL	
						689 - T&D DESIGN EL ENGR - IL	
					SUI - SUB MTCE & CONST - IL	690 - T&D DESIGN DRAFTING - IL	
						03D - SUB MTCE & CONST - IL EAST	
						03E - SYSTEM RELAY SVCS -IL	
			ILER - ILL EMERGENCY RESPONSE	ERO - EMERGENCY RESPONSE	616 - SUB MTCE & CONST - IL WEST		
					686 - SUB MTCE & CONST ENG& ADM - IL		
					92B - SUB MTCE & CONST - IL SOUTH		
					067 - AIC EMERGENCY RESPONSE		
			ILOPS - ILL DIVISION OPERATIONS	DDC - DISTRIBUTION DESIGN CENTER	93R - DDC		
						DVP - DIVISION I	617 - NORTHERN ELECTRIC
							618 - CENTRAL ELECTRIC
				619 - PEORIA ELEC UNDERGROUND			
				624 - PEORIA GAS SERVICE			
				628 - PEORIA GAS CONSTRUCTION			
				669 - DIVISION I SUPPORT STAFF			
91V - GALESBURG							
92D - LASALLE							
93C - KEWANEE							
DVQ - DIVISION II	7JE - JERSEYVILLE						
	7PT - PITTSFIELD						
	7QU - QUINCY						
	7VN - VIRDEN						
	8BE - BEARDSTOWN						
DVR - DIVISION III	8CN - CANTON						
	8CR - CARTHAGE						
	8MA - MACOMB						
	8MS - DIVISION II SUPPORT STAFF						
	8PE - PETERSBURG						
	91N - JACKSONVILLE						
	604 - LINCOLN ELECTRIC OPS						
	605 - SPRINGFIELD ELECTRIC OPS						
607 - LINCOLN GAS OPS							

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					608 - SPFLD GAS CONSTRUCTION
					609 - SPFLD GAS SERVICE
					667 - DIVISION III SUPPORT STAFF
					92E - BLOOMINGTON - NORMAL
					92Q - DECATUR
				DVU - DIVISION IV	1GL - GILMAN
					1PA - PAXTON
					2MA - MATTOON
					2MS - DIVISION IV SUPPORT STAFF
					2NP - NORTH PANA
					2TU - TUSCOLA
					3EF - EFFINGHAM
					3OL - OLNEY
					3RB - ROBINSON
					603 - TUSCOLA GAS OPERATIONS
					606 - HOMER ELECTRIC OPS
					697 - DANVILLE OPS CENTER
					91L - CHAMPAIGN - URBANA
				DVV - DIVISION V	014 - ALTON DISTRICT
					3MS - DIVISION V SUPPORT STAFF
					92J - MARYVILLE
					92T - HILLSBORO
				DVW - DIVISION VI	015 - E. ST. LOUIS DISTRICT
					4AN - ANNA
					4BE - BENTON
					4CA - CARBONDALE
					4HA - HARRISBURG
					4MA - MARION
					4MS - DIVISION VII SUPPORT STAFF
					91U - DIVISION VI SUPPORT STAFF
					92A - MT. VERNON
					93B - BELLEVILLE
					93W - SPARTA
				IOS - IL CONSTRUCTION SERVICES	02F - VEGETATION MGT - IL
					676 - IOS GAS OP & EL MAIN
					682 - IL OPERATIONS SUPPORT
					687 - SUB CONSTRUCTION SVCS - IL
					693 - EDTS ENGINEERING SVCS - IL
				VCF53 - VACANCY FACTOR 53 ROLLUP	53Z - VAC FAC F53
			ILSOPS - ILL GAS OPS & SVCS	FLS - FLEET SERVICES - IL	07C - FLEET SVCS - CIL
					07P - FLEET SVCS - CIP

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					92L - FLEET SVCS - IL
				GAS - GAS OPERATIONS SUPPORT	0G2 - GAS - ADMIN
					0G4 - GAS TECH - OPERATIONS
					0G5 - GAS TECH - ENGINEERING
					0G6 - GAS STORAGE
					0G7 - GAS COMPLIANCE & TRAINING
					0G8 - GAS STANDARDS & PROCEDURES
				IGC - GAS CONTROL - ILL	673 - GAS CONTROL
			LREL - LABOR RELATIONS	ILR - ILLINOIS LABOR RELATIONS	684 - EMPLOYEE RELATIONS - IL
			SGIN - SMART GRID INTEGRATION	SIGI - SMART GRID INTEGRATION	62L - MAP PROJECTS
					62M - SMART GRID TEST BED
			STRN - SAFETY & TRAINING	ETR - EL TRAINING - IL	232 - TRAINING CENTER - DECATUR
					236 - TRAINING CENTER - BELLEVILLE
				SAF - SAFETY - IL	695 - SAFETY ADMINISTRATION - IL
			Z53 - F53 INVALID RMCS	INVM - Z53 INVALID RMC	08N - CUSTOMER SVC CTR - CIP INVALID
					0G1 - GAS TECH SVCS CIP - INVALID
					111 - INVALID BUDGET
					112 - INVALID BUDGET
					113 - INVALID BUDGET
					114 - INVALID BUDGET
					115 - INVALID BUDGET
					116 - INVALID BUDGET
					117 - INVALID BUDGET
					118 - INVALID BUDGET
					1PS - PAXTON SUPPORT STAFF-INVALID
					231 - IL OP AD DIV IV V VI VII INVAL
					24Z - VAC FAC IL DIV IV V VI VII-INV
					25Z - INVALID BUDGET
					2PR - PARIS - INVALID
					3OS - OLNEY SUPPORT STAFF-INVALID
					48Z - VAC FAC IL DIV I II III-INVALI
					602 - SPFLD DIV SUPP SRV-CIL-INVALID
					612 - PEORIA EL OP ADMIN-CIL-INVALID
					613 - PEO ELEC OPER SUPP-CIL-INVALID
					625 - GAS CORP SERV DISPAT-CIL INVAL
					626 - LDU - COMPL & RECD-CIL INVALID
					645 - ENERGY BUSINES CTR-CIL-INVALID
					650 - SPFLD DIV ADMIN-CIL - INVALID
					655 - PEO GS SUPP-PEOPLE-CIL-INVALID
					664 - GAS CENT DIST DSGN -CIL-INVALD
					668 - IL OPS AD DIV I II III INVALID

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					7QS - QUINCY SUPPORT STAFF- INVALID
					90P - IPC CUSTOMER MNGMT INVALID
					90V - GAS SUPPLY IPC - INVALID
					91D - IPC ELE OPS SUPPORT - INVALID
					91E - IPC MGR FLD ENG RES - INVALID
					91F - GAS SUPPORT IPC - INVALID
					91G - IPC ENRGY DLVRY OPS - INVALID
					91Q - IPC OPER SUPPORT - INVALID
					91R - DIVISION I SUPT - IPC INVALID
					91S - DIVISION III SPT -IPC INVALID
					91T - DIVISION V SPT - IPC INVALID
					91Y - CUST ACCTNG DEPT - IPC INVALID
					92H - CORROSION CNTRL IPC - INVALID
					92P - KEY ACCOUNTS - IPC INVALID
					92W - CREDIT & COLLECT - IPC INVALID
					93Q - GAS PLANNING IPC - INVALID
					93Y - APCM GAS TRAN IPC - INVALID
					GTZ - GAS VACANCY FACTOR INVALID
	D26 - IL CUSTOMER SVC & METERING OPS	F63 - IL CUSTOMER SVC & METERING OPS	ICC - IL CUSTOMER SVC & METERING OPS	AMI - ADVANCED METERING	63M - IMP ADMIN & PROJECTS
				CRE - CUST SVCS AND ENRGY EFFICIENCY	02N - CREDIT & COLLECTIONS - IL
					184 - ILL ENERGY EFFICIENCY
					634 - CUST ACCTG - IL
					637 - KEY ACCOUNTS - IL
					639 - CUSTOMER CONTACT CENTER - IL
					674 - AIC ENERGY EFFICIENCY RIDERS
				CSTS - CUSTOMER SATISFACATION	196 - IL CUST SAT & BUS OPTZTN
				CTA - CUSTOMER TECH ADMN	685 - CUSTOMER CARE ADMN
				IMP - IL METERING & PROJECTS	03U - ELECTRIC FIELD METER SERVICES
					615 - METER SHOPS - PEORIA
					630 - ADMINISTRATION
					683 - METER READING SERVICES
					91C - METER SHOPS - DECATUR
	D28 - ILL REGULATORY & FIN SVCS	F66 - ILLINOIS REGULATORY	IRAF - ILL REG AFFAIRS & FIN SVCS	IFS - ILLINOIS REGULATORY & FIN SVCS	180 - ILL PWR SUPPLY AQUISITION
					181 - ILL REGULATORY AFFAIRS
					182 - ILL REG POLICY & RATES
					183 - ILL FINANCE SVCS
					62N - ILL INFRASTRUCTURE DEVELOPMENT
		F68 - ILL EXTERNAL AFFAIRS	IGT - ILL EXTERNAL AFFAIRS	IGR - ILL EXTERNAL AFFAIRS	170 - GOVERNMENT RELATIONS - IL
		F69 - ILLINOIS ADMIN	IAD - ILLINOIS ADMINISTRATION	IAM - ILLINOIS ADMINISTRATION	29D - IL COMMTY REL - PBLC AFFAIRS
					162 - ALT - IL REGULATED
					91A - IL OPS ADMN

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					P20 - IL - SEGMENT SPECIAL ITEMS
S04 - BUSINESS AND CORPORATE SVCS	D12 - AMS LEGAL	F21 - GEN COUNSEL & FED REG-LEG POL	GEN_COUNSEL - GEN COUNSEL & FED REG-LEG POL	GEN CNSL - GEN COUNSEL & FED REG-LEG POL	016 - ECONOMIC DEVELOPMENT
					024 - LEGAL
					038 - CLAIMS
					039 - SECURITY
					058 - SECRETARY'S
					09X - RELIABILITY STDS COMPLIANCE
					157 - GOVERNMENT RELATIONS
					21Z - Vac Fac F21
					29R - REGULATORY POLICY-INVALID
					633 - CRP RATES-REG AFFS-CIL-INVALID
	90A - REGULATORY POLICY-IPC-INVALID				
	90B - LEGAL & CORP SVCS-IPC-INVALID				
	90M - CUST FRCST & PRICE-IPC-INVALID				
	90R - COMPLIANCE-IPC-INVALID				
	90X - SECURITY-IPC-INVALID				
	92F - ECON DEV-FIN STMT-IPC-INVALID				
	92R - REG & PUBLIC POLICY-IPC-INVALID				
	92X - CUST BUSINESS MGMT-IPC-INVALID				
	D30 - AMS FINANCE	F04 - CONTROLLER	AP&P - ACCTG POLICY & PROJECTS CPMBA - CORPORATE MODEL & BUDGET EXT RPTG - EXTERNAL REPORTING GEN ACCTG - GEN ACCTNG IN RPTG - INTERNAL REPORTING WP&FA - WHOLESALE PWR & FUEL ACCT Z04 - F04 INVALID RMCs	APA - ACCTG POLICY & PROJECTS CPMB - CORPORATE MODEL & BUDGET EX RPTG - EXTERNAL REPORTING GAT - GEN ACCTNG INT RPTG - INTERNAL REPORTING WPFA - WHOLESALE PWR & FUEL ACCT INVE - Z04 INVALID RMC	4PL - PLANT ACCOUNTING
	05B - CORPORATE MODEL & BUDGET				
	04C - EXTERNAL REPORTING				
	08T - INVESTOR RELATIONS				
	004 - ACCOUNTING ADMIN				
4GL - GENERAL & ASSET ACCOUNTING					
005 - FINANCIAL SYSTEMS SPPT & STAFF					
04D - INTERNAL REPORTING					
04Z - Vac Fac F04					
310 - WHOLESALE PWR & FUEL ACCT					
04N - INVALID BUDGET					
05E - PERFORMANCE MGMT INVALID					
05P - INVALID BUDGET					
09F - OPERATIONS ANALYSIS - INVALID					
303 - AER SVCS - OPERATION - INVALID					
304 - AER SVCS - INFO SYST - INVALID					
631 - EDU FINANCE & ADMN-CIL-INVALID					
651 - CORP OFFICE SERV-CIL-INVALID					
90C - ACCOUNTING-IPC INVALID					
90D - CONTROLLERS STAFF-IPC INVALID					

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					90E - PERFORMANCE MGMT IPC INVALID
					93L - ACCTS PAY ADMIN-IPC - INVALID
		F09 - TREASURER	TREASURY - TREASURY	TRE - TREASURY	075 - BANKING AND INVESTOR SERVICES
					07Q - ERAC
					07R - FINANCIAL PLANNING & INSURANCE
					09Z - Vac Fac F09
			Z09 - F09 INVALID RMCS	INVO - Z09 INVALID RMCS	90S - RECORDS MANAGEMENT-IPC INVALID
					90T - MICROFILM-IPC INVALID
					90U - MAIL CENTER-IPC INVALID
		F13 - CORPORATE PLANNING	CORP_PLANNING - CORP PLANNING	CPN - CORP PLANNING	012 - CORPORATE PLANNING
					08R - RISK MANAGEMENT
					13Z - Vac Fac F13
			Z13 - F13 INVALID RMCS	INVR - Z13 INVALID RMC	01C - STRATEGIC INITIATIVES INVALID
					01E - INVALID BUDGET
					01R - INVALID BUDGET
					047 - RESEARCH AND DEVTM INVALID
					05F - FINANCIAL FORECASTING INVALID
					09T - COMMERCIAL OPER SUPPT INVALID
					12E - INVALID BUDGET
					155 - INVALID BUDGET
					312 - PROJECT FIN & POLICY INVALID
					BUS - BUS OPS DEM-FMC ONLY INVALID
		F65 - CORPORATE INTERNAL AUDIT	INTERNAL_AUDIT - INTERNAL AUDIT	INTA - INTERNAL AUDIT	05A - INTERNAL AUDIT
					65Z - Vac Fac F65
		F70 - CORPORATE TAX	TAX02 - TAXES	CTAX - TAXES	05T - TAX
					70Z - Vac Fac F70
					90H - TAX-IPC INVALID
	D32 - CORP OPERATIONS OVERSIGHT	F74 - CORP OPERATIONS OVERSIGHT	CORP_OP_OV - CORP OPERATIONS OVERSIGHT	CORP_OPOV - CORP OPERATIONS OVERSIGHT	01D - PROJECT MANAGEMENT OVERSIGHT
					02G - QUAL MGMT OVERSIGHT
					041 - ALT - CORPORATE OVERSIGHT
	D60 - AMS SHARED SERVICES	F05 - SUPPLY SERVICES	BLDSVC - BUILDING SVCS ROLLUP	BLSV - BUILDING SVCS ROLLUP	072 - BUILDING SERVICES-MO
					07N - BUILDING SERVICES-IL
					07V - BUILDING SERVICES
			CSTY - CORPORATE SAFETY & HEALTH	CST - CORPORATE SAFETY & HEALTH	49D - CORPORATE SAFETY
			REALEST - REAL ESTATE ROLLUP	REALES - REAL ESTATE ROLLUP	061 - REAL ESTATE
			SUPPLY CHAIN - SUPPLY CHAIN ROLLUP	SCH - OPERATIONS	050 - SCO UEC ENERGY DELIVERY
					05C - SCO UEC GENERATION (NUCLEAR)
					05D - SCO UEC GENERATION (NON-NUC)
					05N - SCO CIP INVALID

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					05R - SCO CIL INVALID
					05Z - Vac Fac F05
					08P - SCO PROCESS & PERFORMANCE
					91X - SCO AIC
				SDV - DIVERSITY	07B - SDV SUPPLIER DIVERSITY
				SRC - SOURCING	05G - SRC AMS PROCUREMENT
					05L - SRC GEN PURCHASING
					05V - SRC UEC PURCHASING
					074 - SRC AMS PURCHASING
					07M - SRC SOURCING
			Z60 - D60 INVALID RMCS	INVG - Z60 INVALID RMC	07W - BLDG SVCS-CIL INVALID
					07X - PERSIMMON BLDGS-CIL INVALID
					90L - BUILDING SERVICES-IPC INVALID
					90Q - REAL ESTATE-IPC - INVALID
					92K - ELEC ENERGY SUPPLY-IPC-INVALID
				SCO - INVALID SCO RMCS	05M - STOREROOMS-AMS-INVALID08
					05Q - PIONEER PARK WRHSE-CIL-INVALID
					90N - INVESTMENT RECOVEY-IPC-INVALID
					92M - PURCHASING-IPC-INVALID
		F15 - HUMAN RESOURCES	HUMAN_RES - HUMAN RESOURCES	BEN - BENEFITS	017 - EMPLOYEE BENEFITS
					019 - BENEFIT PLANS
				HROTH - HUMAN RESOURCES - OTHER	02E - HR - TALENT MGMT
					02P - HR - COMP & PERF MGMT
					02T - HR - LEADERSHIP & ORG EFFECT
					05H - HR - SVCS & EMPLOYEE RELATIONS
					15Z - Vac Fac F15
			Z15 - F15 INVALID RMCS	INVQ - Z15 INVALID RMCS	02A - RESOURCE POOL-INVALID
					02B - CONTRACT PERSONNEL-INVALID
					02H - HR - WKFRCE PLAN & POL INVALID
					02Q - INVALID BUDGET
					057 - LABOR STRATEGY INVALID
					601 - CORP - COMM & ADV-CIL-INVALID
					638 - CRP LEGI & PUB AFF-CIL-INVALID
					90F - HR - OPERATIONS- IPC INVALID
					91B - EMPLOYEE BENEFITS-IPC INVALID
		F18 - AMEREN SERVICES CENTER	BSO - BUSINESS SERVICES OPERATIONS	BSOX - BUSINESS SERVICES OPERATIONS	002 - PAYROLL & EMPLOYEE SVCS
					064 - PERSONNEL ADMINISTRATION
					06A - MAIL PRINT & RECORDS MGT
					076 - TREASURY TECHNOLOGY SERVICES
					4AP - ACCOUNTS PAYABLE
					4TX - TAX COMPLIANCE
			IT - INFORMATION	CSF - IT CUSTOMER SRVC & FIELD	06B - ENTERPRISE COMPUTING SVC

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
			TECHNOLOGY	OPS	06J - CSF - ASC CUSTOMER SVCS 06M - CSF - TELECOM FIELD OPS 06R - CSF - SECURITY PROVISIONING 632 - CSF - IT FIELD OPERATIONS 80I - CSF - CALLAWAY
				DEV - DEVELOPMENT	08C - DEV-ASSET AND WORK MGMT 201 - IT APP DEV-ENTERPRISE APP SVCS 204 - DEV - ENERGY DEL CUSTOMER SERV
				MAP - MOD ACTION PLAN	202 - AIC-MAP
				NDC - NETWORK & DATA CENTER OPERATIONS	006 - OPS PLATFORM SUPPORT 06H - NEO - ENTERPRISE NETWORKING 06T - NEO - MOBILE & SCADA COMM 06U - NETWORK OPERATIONS
				NEO - NETWORK ENGINEERING & OPS	065 - NEO - TELEPHONE SERVICES 06C - STL CENTRAL SERVER OPS 06F - ENTERPRISE STORAGE 06G - MVS SYSTEMS
				SCP - SECURITY & PLANNING	060 - SCP - PLANNING 06D - SCP - SECURITY 06E - SCP - DATA MANAGEMENT 06Q - TRAINING SERVICES
				VCF18 - VACANCY FACTOR 18 ROLLUP	18Z - Vac Fac F18
			Z18 - F18 INVALID	INVB - F18 INVALID RMCS	06K - INVALID - ENTERPRISE ARCHITECT 06P - INVALID - BUSINESS CONTINUITY 1EB - INVALID - EBUSINESS DEVELOPMT 203 - INVALID - DEV HUMAN RESOURCES 90G - INFO TECH SERVICES-IPC-INVALID 90Y - PRINTING SERVICES-IPC-INVALID
		F20 - ENVIRONMENTAL SERVICES	ES&H - ENVIRONMENTAL SERVICES	ESH - ENVIRONMENTAL SERVICES	049 - ENV SERV - GENERAL 20Z - Vac Fac F20 49A - ENV SERV - AIR 49B - ENV SERV - WASTE 49C - ENV SERV - WATER 92S - ESH - GENERAL-IPC INVALID
		F61 - CORPORATE COMMUNICATIONS	CORP_COMM - CORP COMMUNICATIONS	CCM - CORP_COMM	02M - CORPORATE COMMUNICATIONS 02R - HR - DIVERSITY 02V - EMPLOYEE COMMUNICATIONS 61Z - Vac Fac F61
	D70 - AMS EXECUTIVE	F17 - EXECUTIVE	EXEC - EXECUTIVE	ALT - EXECUTIVE	022 - ALT - AMS - BCS
			INVJ - Z17 INVALID RMC	Z17 - F17 INVALID RMCS	151 - ALT- CIPS INVALID
					153 - ALT- IHC - INVALID

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					159 - ALT- AME - INVALID
					635 - ALT - CIL INVALID
					636 - MKTG & SALES ADMIN-CIL-INVALID
					90K - ALT - IPC-INVALID
	D80 - MISC ITEMS	F10 - OTHER	CORPORATE - CORPORATE	SPI - CORPORATE	089 - APPORTIONMENTS - UEC
					092 - SPECIAL ITEMS-ACCOUNTING DEPT
					096 - MEMBERSHIPS
					098 - OVERHEADS CAPITALIZED - UEC
					099 - CORPORATE SPECIAL ITEMS - UEC
					189 - APPORTIONMENTS - CIPS
					190 - APPMNTS - SPECIAL ITEMS - AMS
					192 - PLT & REG AUTOMATED JOURNALS
					193 - PLANT & REGULATORY ITEMS - CIPS
					194 - PLANT & REGULATORY ITEMS - AMS
					199 - CORPORATE SPECIAL ITEMS
					299 - ACCOUNTING ENTRIES-CIL
					399 - ACCOUNTING ENTRIES - IPC
					AFC - ALLOWANCE FOR FUNDS
					APP - APPORTIONMENTS
					CIC - CIC
					COR - CORPORATE DEMAND SVCS-FMC ONLY
					DEP - DEPRECIATION
					IBA - INTERCOMPANY BILLINGS ADDERS
					INC - INCOME ITEMS
					MCR - MISSOURI CENTRAL RAILROAD CO
					NCP - NON-CAPITALIZED PAYROLL EXP
					APPORT
					REV - REVENUES
					SRB - SERVICE REQUEST BILLINGS
					SRR - SERVICE REQUEST RECLASS
					TAX - TAXES
			INVK - Z10 INVALID RMC	Z10 - MISC INVALID RMCS	08M - Invalid RMC
					12R - INVALID BUDGET
					386 - FOSSIL FUEL GEN - INVALID
					654 - WORK STOPPAGE-CIL-INVALID
					657 - SMT TRANSFER PRICG-CIL-INVALID
					658 - EDU TRSF PRICING-CIL-INVALID
					659 - INDIAN TRL TRSF PR-CIL-INVALID
					660 - ED EDWARDS TRSF PR-CIL-INVALID
					661 - DUCK CREEK TRSR PR-CIL-INVALID
					662 - QST MKTG PLN ADMN-INVALID

RMC Tree as of 5/15/2013

RMC Segment	RMC Division	RMC Function	RMC Department	RMC L6	RMC L7
					663 - QST CORP ENTRIES-INVALID
					ADC - AMEREN DEVELOPMENT CRP-INVALID
					AMC - AMEREN CORPORATION-INVALID
					CIC02 - CIPSCO INVESTMENT CO - INVALID
					CIL - INVALID BUDGET
					CIM - CILCORP INVESTMENT MGT-INVALID
					CLM - CILCORP LEASE MGMT-INVALID
					CRG - CIPS REGIONS - INACTIVE
					HRF - HRFeed-Invalid
					PT2 - Invalid RMC
					TPA - TEMP PROJ ADDITIONS - INVALID
					UDC - UNION ELECTRIC DEV CRP-INVALID
		F11 - FUEL	FOSSIL_FUEL - FOSSIL FUEL	FOS - FOSSIL	086 - FOSSIL FUEL BURNED
					186 - FOSSIL FUEL-GENCO
					286 - FOSSIL FUEL-CIL
			NUCF - FUEL	NUCFL - FUEL	034 - NUCLEAR FUEL
S05 - TRANSMISSION SERVICES	D29 - TRANSMISSION MAINT & OPERATIONS	F60 - TRANS OPS PLNG POLICY & REG	TRX - TRANSMISSION	TRB - TRANSMISSION BUS SVCS REG	048 - TRANSMISSION SVCS BUSINESS CTR
					09D - TRANSMISSION POLICY
					61N - ALT TRANSMISSION
				TRN - TRANSMISSION - MAINTENANCE	037 - TRANSMISSION - UEC
					03B - TRANSMISSION - CIL
					03C - TRANSMISSION - CIP
					03T - TRANSMISSION - AMS
					691 - VEGETATION MGMT - TRANSMISSION
					91H - TRANSMISSION - IL
				TRP - TRANS OPS PLNG POLICY ®	042 - TRANSMISSION OPERATIONS
				VCF60 - VACANCY FACTOR 60 ROLLUP	09P - ELECTRIC PLANNING
					60Z - Vac Fac F60
		F72 - GAS TRANSMISSION OPERATIONS	TRG - GAS TRANSMISSION	GTX - GAS TRANSMISSION	61L - GAS TRANSMISSION
				IGS - GAS SUPPLY - ILL	672 - GAS SUPPLY
				VCF72 - VACANCY FACTOR 72 ROLLUP	72Z - Vac Fac F72

**Ameren Illinois Company's
Response to ICC Staff Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 3/15/2013**

ENG 3.01

Referring to Schedule C-4, explain the variation in the 2011-2014 expenses for the following accounts, and explain why the test year amount is an accurate representation of the future expenses for each account. Please provide the information as soon as it available on a per account basis and please continue to supplement the response until the response is complete.

- a) 814
- b) 821
- c) 832
- d) 834
- e) 837
- f) 850
- g) 856
- h) 857
- i) 863
- j) 867
- k) 870
- l) 874
- m) 875
- n) 878
- o) 879
- p) 880
- q) 885
- r) 889
- s) 893

RESPONSE

Prepared By: Stephen R. Colyer
Title: Sr. Director Gas Operations & Services
Phone Number: 217-424-6933

The following attachments provide a summary of the variance explanations for the 19 identified accounts. The variance explanations support why the forecasted amounts for these accounts are an accurate representation of the expenses that will be necessary to execute the incremental and ongoing projects and activities that AIC is planning to perform in 2014 and beyond.

Please see ENG 3.01 Attach for the variance explanations for the identified Gas Storage accounts. Ameren Illinois intends to supplement this response with additional information as necessary, including the identified Gas Transmission and Gas Distribution accounts.

Please note, for the identified accounts, the attachments contain actual 2011 costs, actual 2012 costs, corrected projections for 2013 costs and corrected projections for 2014 costs. It is my understanding Ameren Illinois is filing supplemental testimony to provide actual 2012 costs and explain the corrections to projected 2013 and 2014 costs.

Account	Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
Operations	Maintenance					
Natural Gas Storage, Terminaling, & Processing Expenses						
a) 814	Operation, Supervision, and Engineering	1,180	1,024	1,188	1,477	The increase in account 814 is due to additional internal and external engineering resources to support additional reservoir and modeling activities. These activities are described in lines 1346 – 1351 of Ameren Exhibit 7.0. The additional reservoir modeling will help support the reservoir activities for Sciota, Centralia, and Glasford storage fields. In order to perform the well work in account 832, additional storage engineers will be needed to run the program, evaluate the results, and take action. An additional Petroleum Engineer and Gas Storage Technician are required. The described additional resources will be required also in 2015 and 2016 and beyond to further refine the studies and continue well maintenance efforts.
b) 821	Purification Expenses	561	778	1,109	1,197	The increase in account 821 is due to additional materials and contractor resources to replace H2S removal chemical. Materials consist of the Sulfatreat chemical used to remove H2S. A contractor is hired to remove and fill the towers used to hold the chemical. Normal future year's chemical replacements for 2014, 2015, 2016 and beyond include one annual tower at Lincoln, two annual towers at Glasford, and three annual tower replacements at Hillsboro. In 2012 Ameren replaced chemical in three towers at Hillsboro, one tower at Glasford, and no towers at Lincoln. Additionally it is anticipated that increases in contractor and chemical costs will occur. Labor costs will also increase. Annual glycol tower inspections are proposed to ensure the integrity and proper operation of the towers. These activities are described in lines 1319 – 1323 of Ameren Exhibit 7.0.
c) 832	Maintenance of Reservoirs and Wells	302	443	1,356	4,669	These activities are described in lines 1324 – 1345 of Ameren Exhibit 7.0. The following activities help ensure the integrity of the wells and reservoir. The major categories of activities include observation well cleanout, master valve replacement, well testing, and logging. It is expected that these actions will identify some issues such as wells requiring workovers to return deliverability, integrity issues which will need to be addressed, and wells requiring clean outs in order to perform logging. Follow up work will require funding for corrective actions and the below programs will be reduced to cover those costs to match the projected 2014 costs. The programs will begin to ramp up in 2013 and they are planned to be fully started by 2014. These activities are multi-year programs that will last far beyond 2014, 2015, and 2016.
						Observation well work - Observation wells provide valuable information regarding the overall reservoir performance and stability of the field. Over time these wells can develop issues that prevent or limit the ability to obtain accurate readings and determinations. Depending on individual well circumstances, activities may consist of cleaning out of wells, re-perforating wells, and acidizing. It is estimated that it will cost \$50,000 per well to perform this work. Currently, Ameren Illinois is proposing to do 10 wells per year for a total cost of \$500,000 when fully started in 2014 and continue on in 2015 and 2016 and beyond. Similar types of activities on observation wells were not performed in 2011 or 2012.

Account	Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
Operations	Maintenance					
Natural Gas Storage, Terminaling, & Processing Expenses						
c) 832 (continued)	Maintenance of Reservoirs and Wells	302	443	1,356	4,669	<p>Master Valve Replacements - A number of wells do not have full bore master valve access to the production casing which prevents production casing inspection logging. Other well head valves do not permit full shut off and isolation of the well. Both of these instances require the master valve to be replaced. These described situations also presents potential risks if a problem with the well occurs and the valve is necessary for responding to the situation. These situations could prevent down hole access to the production casing with tools to address the issue. The proposed program would allow for killing the well and replacing the master valve with a new master valve which would permit full bore access to the production casing. This work will be required on a number of wells before the below-mentioned logging activity can be completed. It is estimated to cost \$125,000 per well this issue and will take several years to complete. \$2,000,000 will allow for 16 wells to be addressed per year.</p> <p>Well Testing - Performance tests provide valuable information with regard to the deliverability capability and the mechanical health of a well. Well deliverability is important to maintain the overall storage field deliverability of gas supply for our customers and confirm the wells will meet peak day requirements. By having performance data, necessary well remediation work can be prioritized. Wells which are most important to the performance of the field can be determined, and projections on the overall peak performance of a field made. It is estimated that it will cost \$4000 to performance test each well. Ameren Illinois proposes dedicating \$180,000 per year to perform well testing, which will allow for the evaluation of 45 wells each year. The program will continue in 2015 and 2016 and beyond. Four wells were tested in 2011 and no wells were tested in 2012.</p>

Account	Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
Operations	Maintenance					
Natural Gas Storage, Terminating, & Processing Expenses						
c) 832 (continued)	Maintenance of Reservoirs and Wells	302	443	1,356	4,669	<p>Logging - Vertilog casing inspection services use magnetic flux-leakage measurements to identify and quantify internal and external casing corrosion defects. The overlapping arrays of flux-leakage sensors and discriminator. sensors offer full circumferential inspection of the tubing or casing string. This process differentiates between metal-loss (corrosion) and metal-gain (hardware) features, and distinguishes between general corrosion and isolated pitting. If corrosion were to reach the point of penetrating the casing, it could cause a loss of storage gas to higher structures that would not be retrievable or leak gas into areas that would not be safe for the public. This logging activity helps identify wells or areas in the well requiring action in order to prevent a loss of gas.</p> <p>Neutron logging tools help evaluate reservoir conditions, diagnose problems and manage well performance. These surveys evaluate performance problems, identify mechanical failures, improve well productivity and assist in reservoir management and surveillance for both production and injection wells. Neutron and Temperature logs can also be used to confirm that stored gas is remaining in the reservoir is not charging up shallow zones.</p> <p>Depending on the initial findings, consideration will be given to running some Cathodic Protection logs to insure the cathodic protection systems are performing as expected in the well.</p> <p>Cement bond logs are used to help determine if there is sufficient height and quality of cement above the gas storage reservoir to contain storage gas within the reservoir. A CBL also is used to verify that there is adequate cement isolation (bonding and containment) between the well bore and the production casing to prevent storage gas from channeling up hole through micro annuli between the cement sheath and the casing or the cement sheath and formation face. Many of the storage wells operated by Ameren Illinois are previousold gas production wells in formerly depleted gas reservoirs which were converted to gas storage. No cement bond logs are available for these wells. Ameren Illinois proposes running cement bond logs in these gas storage wells to determine the cement quality behind the production casing. This will require moving in a well service rig, killing the wells, and running the cement bond logs. The CBLs will cost \$62,000 per well. Addressing 10 wells per year will cost \$620,000.</p> <p>In order to determine whether wells have integrity issues due to wall loss, gas leakage above the storage zone, or performance issues, Ameren Illinois proposes to initiate a storage well logging program that would enable a casing inspection log for every storage well over a ten year time period. The same process would be repeated over the next ten year period, with all wells being re-logged. After the second evaluation, comparative changes in the logs would be</p>
d) 834	Maintenance of Compressor Station Equipment	374	519	638	613	The increase in account 834 is due to additional internal management resources assigned to compressor station maintenance activities.
e) 837	Maintenance of Other Equipment	754	841	942	1,090	These activities are described in lines 1352 – 1355 of Ameren Exhibit 7.0 related to painting activities. Some other additional resources are being spent on utility services, tools, parts, and expenses.

**Ameren Illinois Company's
Response to ICC Staff Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Supplemental Response Date: 3/22/2013**

ENG 3.01S

Referring to Schedule C-4, explain the variation in the 2011-2014 expenses for the following accounts, and explain why the test year amount is an accurate representation of the future expenses for each account. Please provide the information as soon as it available on a per account basis and please continue to supplement the response until the response is complete.

- a) 814
- b) 821
- c) 832
- d) 834
- e) 837
- f) 850
- g) 856
- h) 857
- i) 863
- j) 867
- k) 870
- l) 874
- m) 875
- n) 878
- o) 879
- p) 880
- q) 885
- r) 889
- s) 893

RESPONSE

**Prepared By: Stephen R. Colyer
Title: Sr. Director Gas Operations & Services
Phone Number: 217-424-6933**

The following attachments provide a summary of the variance explanations for the 19 identified accounts. The variance explanations support why the forecasted amounts for these accounts are an accurate representation of the expenses that will be necessary to execute the incremental and ongoing projects and activities that AIC is planning to perform in 2014 and beyond.

ENG 3.01 Attach 1 submitted on 3/15/13 provided for the variance explanations for the identified Gas Storage accounts. ENG 3.01S Attach 3 submitted herewith provides for the variance explanations for the identified Gas Transmission accounts. Ameren Illinois intends to supplement this response with additional information as necessary, including the identified Gas Distribution accounts (Attach 2).

Please note, for the identified accounts, the attachments contain actual 2011 costs, actual 2012 costs, corrected projections for 2013 costs and corrected projections for 2014 costs. These corrected costs were also provided and discussed in Ameren Illinois Supplemental Direct testimony of Mr. Michael Getz, Exhibits 14.0 and 14.1.

Account		Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
Operations		Maintenance					
Natural Gas Distribution Expenses							
k)	870	Operation, Supervision, and Engineering	\$ 5,400	\$ 6,049	\$ 7,098	\$ 7,723	Account 870 increased by approximately \$1 million from 2012 to 2013 and approximately \$1.67 million from 2012 to 2014. The increases in both years are predominantly the result of increased labor costs for the Ameren "Watch and Protect" program as noted on line 1207 of Ameren Exhibit 7.0, and increases in costs for general distribution system supervision. The Watch and Protect program as described in Exhibit 7.0 has an emphasis to reduce the risks of third-party excavation damage. The increase in supervision is in support of greater focus on system operations and maintenance activities.
l)	874	Mains and Services Expenses	\$ 4,522	\$ 5,441	\$ 8,215	\$ 9,225	Account 874 increased by approximately 2.8 million between 2012 and 2013 and by approximately 3.8 million between 2012 and 2014. The account increased due to contractor cost increases from 2012 levels of approximately \$700 in 2013 and \$1.17 million in 2014 for contract locating of buried gas facilities in support of the Illinois J.U.L.I.E. one call system. The account increased due to contractor costs increases from 2012 levels of approximately \$1.5 million in 2013 and \$1.8 million for increased maintenance of gas mains to reduce risks through targeted gas leak repairs, sewer cross bore inspections, and mapping and records updates all in direct support of the Ameren DIMP program identified Additional and Accelerated actions. The account also increased from 2012 levels due to contractor costs increases of approximately \$600,000 in 2013 and \$900,000 in 2014 for pipeline right of way vegetation clearing of high pressure distribution pipelines.
m)	875	Measuring and Regulating Station Expenses-General	\$ 1,509	\$ 1,516	\$ 1,997	\$ 2,066	Account 875 increased \$482,000 between 2012 and 2013, and approximately \$551,000 between 2012 and 2014. The account increases both years are due to increased labor costs for general maintenance of gas regulator stations. General maintenance typically includes routine monitoring, inspection, and operation of pressure reducing and measurement stations.
n)	878	Meter and House Regulator Expenses	\$ 9,207	\$ 9,421	\$ 11,332	\$ 11,778	Account 878 increased approximately \$1.91 million between 2012 and 2013, and by approximately \$2.36 million between 2012 and 2014. The account increased approximately \$1.7 million in 2013 and approximately \$1.9 million in 2014 due to increased labor costs for customer requested account turn-ons and disconnects. The remainder of the account increases for 2013 and 2014 are for labor costs increases for routine meter exchanges and expenses.
o)	879	Customer Installations Expenses	\$ 3,415	\$ 3,612	\$ 4,996	\$ 5,113	Account 879 increased approximately \$1.4 million between 2012 and 2013, and by approximately \$1.5 million between 2012 and 2014. The increase in both years is due to increased labor and transportation costs associated with gas leak response and investigations. Ameren Illinois has significantly reduced its customer leak complaint response times by focusing more efforts and resources on customer call response. The increased focus has resulted in increased labor and transportation costs.
p)	880	Other Expenses	\$ 11,855	\$ 13,499	\$ 13,502	\$ 15,412	Account 880 increased approximately \$1.9 million between 2012 and 2014; there was not a significant increase between 2012 and 2013. The increase is due to approximately \$900,000 for contractor costs associated with the EAM project and ongoing contractor costs of approximately \$300,000 for gas standards and records management. Also, there is an increase of approximately \$900,000 in labor costs for additional gas training staff needed for new Gas Journeyman training, additional engineering staff in support of the DIMP program, and additional mapping and drafting resources to support gas system record updates.
q)	885	Maintenance Supervision and Engineering	\$ 447	\$ 478	\$ 935	\$ 987	Account 885 increased approximately \$450,000 between 2013 and 2013, and approximately \$500,000 between 2012 and 2014. The account increased both years due to increases in Supervisory and Engineering labor costs associated with general field gas system maintenance work.

Account	Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
	Operations					
	Maintenance					
Natural Gas Distribution Expenses						
r) 889	Maintenance of Measuring & Regulating Station Equipment - General	\$ 1,846	\$ 2,324	\$ 3,045	\$ 3,456	Account 889 increased by approximately \$700,000 between 2012 and 2013, and by approximately \$1.1 million between 2012 and 2014. The account increased by approximately \$172,000 between 2012 and 2013 and by approximately \$380,000 between 2012 and 2014 for contractor painting of gas regulator stations to address atmospheric corrosion. The account increased approximately \$260,000 between 2013 and 2014 and approximately \$440,000 due to the addition of dedicated field labor resources for the maintenance of electronic equipment at regulator stations. Previously, the work was performed by contractors or substation labor; the addition of these dedicated resources was needed in support of the increasing volume of electronic equipment used in the gas measurement and control facilities. The account also increased approximately \$300,000 between 2012 and 2014 for labor and materials associated with general measurement and regulation station maintenance.
s) 893	Maintenance of Meters and House Regulators	\$ 3,049	\$ 3,472	\$ 3,731	\$ 4,435	Account 893 increased by approximately \$259,000 between 2012 and 2013, and by approximately \$963,000 between 2012 and 2014. The account increased by approximately \$100,000 between 2012 and 2013 and by approximately \$360 between 2012 and 2014 for contractor painting of gas meter sets to address atmospheric corrosion. The account increased between 2012 and 2013 by approximately \$160,000 and between 2012 and 2014 by approximately \$600,000 for labor for periodic gas meter exchanges. The cost increase between 2013 and 2014 is also in support of additional gas meter shop labor needed in support of the gas AMI meter program.

**Ameren Illinois Company's
Response to ICC Staff Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Second Supplemental Response Date: 3/21/2013**

ENG 3.01S2

Referring to Schedule C-4, explain the variation in the 2011-2014 expenses for the following accounts, and explain why the test year amount is an accurate representation of the future expenses for each account. Please provide the information as soon as it available on a per account basis and please continue to supplement the response until the response is complete.

- a) 814
- b) 821
- c) 832
- d) 834
- e) 837
- f) 850
- g) 856
- h) 857
- i) 863
- j) 867
- k) 870
- l) 874
- m) 875
- n) 878
- o) 879
- p) 880
- q) 885
- r) 889
- s) 893

RESPONSE

Prepared By: Stephen R. Colyer
Title: Sr. Director, Gas Operations & Services
Phone Number: 217-424-6933

The following attachments provide a summary of the variance explanations for the 19 identified accounts:

- ENG 3.01 Attach submitted on 3/15/13 provided for the variance explanations for the identified Gas Storage accounts.
- ENG 3.01S Attach 3 submitted on 3/20/13 provided for the variance explanations for the identified Gas Transmission accounts.

- ENG 3.01S2 Attach 2 submitted herewith provides for the variance explanations for the identified Gas Distribution accounts.

Please note, for all of the identified accounts, the attachments contain actual 2011 costs, actual 2012 costs, corrected projections for 2013 costs and corrected projections for 2014 costs. These corrected costs were also provided and discussed in Ameren Illinois Supplemental Direct testimony of Mr. Michael Getz, Exhibits 14.0 and 14.1.

The variance explanations support why the forecasted amounts for these accounts are an accurate representation of the expenses that will be necessary to execute the incremental and ongoing projects and activities that AIC is planning to perform in 2014 and beyond. Ameren Illinois may supplement the response and attachments with additional information if necessary.

For the Distribution accounts, internal labor costs including management and bargaining unit (represented) resources as well as contractor resources are a substantial portion of the historical costs as well as costs that are forecasted in the test year. For the Distribution accounts, AIC internal labor costs are projected to increase from 2012 from approximately \$43.3 million to approximately \$53 million in 2014 of which approximately \$2.1 million was directly related to annual wage increases. The additional AIC internal cost increases are directly related to additional staffing added to support specific activities outlined in Exhibit 7.0 testimony. Distribution costs for contractor labor are projected to increase from the 2012 level of approximately \$8.5 million to approximately \$13.3 million in 2014. The contractor labor increases are also directly related to specific activities outlined in Exhibit 7.0 testimony. The primary O&M recurring costs and costs increases are directly related to pipeline safety regulations, pipeline integrity improvements, and risk reduction activities generally outlined in Exhibit 7.0 line 253 through line 283. Beginning in 2012 and continuing in 2013 and the forecasted test year of 2014, AIC has added internal resources to perform activities that are targeted at meeting the requirements of pipeline safety regulations and strengthening overall pipeline safety. These internal resource costs as well as the contractor costs are reflected and accounted for within the various Distribution accounts. Some of the major activities where internal resources have been incrementally added include internal engineering and operations personnel, records and mapping personnel, contractor inspectors, and as well as external contractors to support numerous activities. Some of these activities, further described in testimony, were supported with additional resources as follows. The examples specifically identified are not intended to be all-inclusive.

- Watch and Protect Program – In late 2012, 5 additional positions were added and forecasted in 2013, the 2014 test year and subsequent years. This program supports the requirements of the distribution integrity regulations. 3rd party damage to AIC gas facilities has been reduced in 2011 and 2012 as a result of adding these positions into the Watch and Protect program.
- Quality Assurance/Training – 2 additional, new training and operator qualification positions are forecasted to be added in 2013 and maintained in the 2014 test year and subsequent years. The quality assurance positions are to support the pipeline safety audits conducted by the ICC pipeline safety staff as well as perform internal quality assurance audits on AIC personnel performing pipeline safety related operating and maintenance activities to ensure all pipeline safety regulations are followed. AIC communicates periodically with the ICC pipeline

- safety staff on quality assurance audit results and ensuring the program is successful and effective.
- DIMP – In 2013, AIC is forecasting to add 4 positions specifically to improve the data and records relied upon for evaluating system risks and pipeline integrity of distribution systems. In 2014 the DIMP group is forecasting to add an additional engineer to support the growing requirements of the regulatory driven DIMP program.
 - Corrosion Control – In 2013 and forecasted in 2014 and beyond, 3 additional dedicated field union positions and one field Supervisory position were added to support additional field monitoring, inspection, and trouble shooting of pipeline cathodic protection levels. There has been increased regulatory driven emphasis on improving the overall AIC corrosion control program.
 - Gas SCADA – In 2013, AIC is filling 4 new union (represented employees) positions and one supervisory position to oversee and perform operations and maintenance activities on supervisory control and data acquisition (SCADA) equipment that controls the flow of gas and monitoring of odorization, system pressures, etc. These positions are forecasted to be added in 2013 and maintained in the 2014 test year, and subsequent years.
 - AMI – In 2014, AIC is forecasting to fill 5 new union positions to support the implementation and operation and maintenance of automated metering infrastructure (AMI) project. These positions are forecasted to be maintained in the 2014 test year and subsequent years.
 - Gas Regulation - – In 2013, AIC is filling 4 new union (represented employees) positions to perform operations and maintenance activities on gas regulation, pressure control equipment, and odorization equipment. The positions will also support activities on distribution system pressure monitoring equipment and commercial/industrial pressure control and measurement equipment. These positions are forecasted to be added in 2013 and maintained in the 2014 test year, and subsequent years.

Account	Description	2011 Actual	2012 Actual	2013 Corrected	2014 Corrected	Variance Explanation
Operations						
Maintenance						
Natural Gas Transmission Expenses						
f) 850	Operation, Supervision, and Engineering	\$ 248	\$ 474	\$ 291	\$ 432	Account 850 decreased approximately \$42,000 between 2012 and 2014 due to reduced costs in supervision and contract engineering.
g) 856	Mains Expenses	\$ 940	\$ 899	\$ 2,315	\$ 3,559	Account 856 increased between 2012 and 2014 by approximately \$2.6 million to support the expanded level of transmission integrity assessments as described in lines 1270-1296 of Ameren Exhibit 7.0 related to "Transmission O&M work planned for 2014." Approximately \$2.5 million of the cost increase is for contractors and supervision to perform pipeline assessments of additional Transmission pipeline facilities in support of the anticipated PHMSA expansion of requirements for transmission integrity programs. The expansion will increase, on an ongoing basis, the miles of pipe to be assessed from approximately 80 miles to in excess of 250 miles. The increase in miles of pipe to assess will result in higher annual expenses for all future years. PHMSA is currently collecting and evaluating industry data, based on mandated timelines, to determine the detailed pipeline safety code requirements which are anticipated to be released in 2013. AIC is initiating work in 2013 to position for the anticipated assessment expansion which is increasing costs approximately \$1.4 million in 2013 above the 2012 level.
h) 857	Measuring and Regulating Station Expenses	\$ 54	\$ 101	\$ 51	\$ 93	Account 857 decreased approximately \$7,000 between 2012 and 2014. Costs for this account are primarily for contractor supported work associated with regulator station inspections and operations.
i) 863	Maintenance of Reservoirs and Wells	\$ 56	\$ 287	\$ 120	\$ 175	Account 863 decreased approximately \$112,000 between 2012 and 2014. The costs for this account are primarily for contractor supported work associated with integrity management work on gas transmission pipelines within gas storage fields such as pipeline assessments.
j) 867	Maintenance of Other Equipment	\$ 76	\$ 47	\$ 115	\$ 142	Account 867 increased by approximately \$95,000 from 2012 to 2014. The increase in costs is attributed to an increase in contractor costs for gas transmission equipment maintenance. Costs are also increasing approximately \$68,000 between 2012 and 2013 due to increased contractor support for gas transmission equipment maintenance. Typical maintenance would be rebuilding transmission line valve operators that have become difficult to operate, performing maintenance on odorizer pumps, pressure transmitters, and ancillary equipment.

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/9/2013**

AG 9.04

Ref: Response to AG 3.01, Attachment 1, Schedule C-4 (Expense Variances). For each of the following Accounts listed in Comparative Income Statement Schedule C-4 that was provided in response to AG 3.01, the proposed Test Year Amount of expense is much higher than average historical actual expense levels. For each account listed below, please provide a detailed itemization and discussion of each reason why the much higher projected test year expenses are believed to be reasonable, along with copies of all analyses and documents associated with or supportive of your response:

- a. Account 814 average expenses in 2011 and 2012 were \$1.1 million, but test year forecasted expenses are \$1.624 million.
- b. Account 832 average expenses in 2011 and 2012 were \$0.4 million, but test year forecasted expenses are \$2.010 million.
- c. Account 837 average expenses in 2011 and 2012 were \$0.8 million, but test year forecasted expenses are \$2.615 million.
- d. Account 856 average expenses in 2011 and 2012 were \$0.9 million, but test year forecasted expenses are \$5.765 million.
- e. Account 863 average expenses in 2011 and 2012 were \$0.2 million, but test year forecasted expenses are \$0.564 million.
- f. Account 870 average expenses in 2011 and 2012 were \$5.7 million, but test year forecasted expenses are \$7.64 million.
- g. Account 874 average expenses in 2011 and 2012 were \$5.0 million, but test year forecasted expenses are \$8.183 million.
- h. Account 878 average expenses in 2011 and 2012 were \$9.3 million, but test year forecasted expenses are \$11.802 million.
- i. Account 879 average expenses in 2011 and 2012 were \$3.5 million, but test year forecasted expenses are \$5.688 million.
- j. Account 880 average expenses in 2011 and 2012 were \$12.7 million, but test year forecasted expenses are \$14.2 million.
- k. Account 889 average expenses in 2011 and 2012 were \$2.1 million, but test year forecasted expenses are \$3.1 million.
- l. Account 893 average expenses in 2011 and 2012 were \$3.3 million, but test year forecasted expenses are \$5.3 million.
- m. Account 902 average expenses in 2011 and 2012 were \$10.9 million, but test year forecasted expenses are \$12.8 million.
- n. Account 920 average expenses in 2011 and 2012 were \$10.2 million, but test year forecasted expenses are \$11.8 million.
- o. Account 923 average expenses in 2011 and 2012 were \$5.6 million, but test year forecasted expenses are \$7.0 million.
- p. Account 926 average expenses in 2011 and 2012 were \$15.4 million, but test year forecasted expenses are \$23.0 million.

- q. Account 408 average expenses in 2011 and 2012 were \$53.8 million, but test year forecasted expenses are \$58.0 million.

RESPONSE

Response to subparts a) thru l) only:

Prepared By: Stephen R. Colyer

Title: Senior Director, Gas Operations & Services

Phone Number: 217-424-6933

Please see Supplement Direct testimony filed by Mr. Michael Getz. Exhibit 14.1 reflects the corrected numbers for the 800 and 900 series FERC accounts.

- a) See the Company's response to Staff data request ENG 3.01 (dated March 15, 2013).
- b) See response to subpart a).
- c) See response to subpart a).
- d) See the Company's response to Staff data request ENG 3.01S (dated March 20, 2013).
- e) See response to subpart d).
- f) See the Company's response to Staff data request ENG 3.01S2 (dated March 22, 2013).
- g) See response to subpart f).
- h) See response to subpart f).
- i) See response to subpart f).
- j) See response to subpart f).
- k) See response to subpart f).
- l) See response to subpart f).

Response to subparts m) thru p) only:

Prepared By: Michael J. Getz

Title: Controller, Ameren Illinois

Phone Number: 309-677-5111

- m) The increase in Account 902 - Meter Reading expenses is primarily due to internal union labor costs and projected increases in contract meter reader expense.
- n) The increase in Account 920 – A&G Salaries is due to several factors including the correction of the allocation for safety internal labor in the test year to assign 40% or \$366,000 to gas. In addition, while overall charges for AMS benefits & taxes that follow labor have only increased 1% or \$23,000 for gas, the allocation between accounts is different in 2014 with account 920 increasing \$495,000 and account 880 decreasing \$469,000 from the 2012 actual amounts. AMS labor for application maintenance and support is also forecasted to increase \$288,000.
- o) See the Company's response to Staff data request DGK 4.01 (dated April 4, 2013) for details.
- p) The increase in Account 926 – Employee Pension and Benefits is primarily due to increased pension and OPEB expense based on actuarial data from Towers-Watson and increased medical benefits. Pension and benefit expenses are initially forecasted to electric and then 28.3% of the costs are transferred to gas based on 2011 actual payroll charges.

Response to subpart q) only:

Prepared By: Ronald D. Stafford

Title: Director, Regulatory Accounting

Phone Number: 314-206-0584

- q) The increase in account 408 expenses is primarily due to a forecasted increase in the Illinois Public Utility Charge tax. AIC is a collection agent for this tax, which is removed from operating expenses in calculation of gas revenue requirement. However, there is a derivative impact on gas revenue requirement as this tax is included in the calculation of cash working capital. There is also an increase in payroll tax primarily due a forecasted increase in the Federal Insurance Contributions tax. This tax is impacted by the amount the tax and the tax rate. See AG 9.04 Attach for itemization of tax amounts for the historical and forecasted periods supportive of the response:

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/29/2013**

AG 12.03

Ref: Responses to AG 1.03, 1.04, 5.02 and 5.06 (Staffing Changes). With respect to each of the staffing additions proposed for the 2014 test year, please respond to the following:

- a) Explain whether senior executive management has approved the position for hiring or in the alternative is awaiting Commission approval of rate recovery for wage and benefit costs associated with the new position.
- b) Indicate whether Form 3480 has been processed for the new position and provide copies of such forms in support of any affirmative response.
- c) Explain whether the job has been posted or advertised to solicit applicants.
- d) Explain whether interviews have been scheduled or conducted.
- e) Identify and describe job offers that have been extended, if any.
- f) Identify and describe job offers that have been accepted, indicating the planned start date for each new employee.
- g) For each new position, explain whether actual hiring to fill the position is contingent upon Commission approval of rate recovery for the labor-related costs of the position.

RESPONSE

Prepared By: Ronald D. Pate
Title: Vice President Operations & Technical Services
Phone Number: 217-424-6518

- a) Ameren Illinois plans to fill 86 open gas only positions between the end of February 2013 and end of June 2014. Senior executive management has approved the 65 positions reported open for 2013 as of the end of February 2013. Senior executive management, however, is awaiting Commission approval of rate recovery for wage and benefit costs associated with the 21 positions proposed in the 2014 test year, prior to making any offers. Recruitment and interviews for the 21 open gas only positions in 2014 will begin by the fourth quarter of 2013.

Please see AG 12.03 Attach 1, which is a correction to AG 5.03 Attach 1. In preparation of this response, AIC discovered a system error in which headcount statistics were not properly reflected in the reporting system. This change to correct the error has increased the total headcount for open gas only positions as

of end of February 2013 from 80 to 86. The 6 additional positions are consistent with the headcount employed by AIC in Division 2 for projecting labor expense for 2014.

- b) AIC has been steadily filling the 2013 budgeted positions; thirty-eight employees have been offered and/or accepted positions out of the 65 open positions reported in February 2013 and referenced in AG 12.03 Attach 2. 3480s are only submitted for employees that have accepted and established a start date. For those employee's, 3480s have been submitted in schedule AG 12.03 Attach 3. Please see AG 12.03 Attach 4 for AIC's projected schedule to fill the open 2014 gas only positions.
- c) AIC has posted or advertised 48 of 65 vacant job positions reported in February 2013. Posted or advertised positions are part of schedule AG 12.03 Attach 2.
- d) AIC has interviewed or scheduled interviews for 43 of the 65 vacant positions reported in February 2013. Interviews or scheduled interviews are part of schedule AG 12.03 Attach 2.
- e) AIC has offered 38 of 65 vacant positions reported in February 2013. Offered positions are part of schedule AG 12.03 Attach 2.
- f) AIC has hired 35 of the 65 vacant positions reported in February 2013. The start date of each hired employee is listed in schedule AG 12.03 Attach 2.
- g) AIC has received approval and is in the process of hiring 2013 positions listed in AG 12.03 Attach 2. Please see AG 12.03 Attach 4 for AIC's projected schedule to fill the open 2014 gas only positions.

Ameren Illinois Company
2014 Incremental Gas Ops & Services Staffing

Program	RMC	RT	Payroll Department	2014 Added Headcount	Job Description/Function	Proposed Date(s) to Fill Position(s)	Reason for Position(s)
Asset Management	OG2	LM	83N	1	Asset Management	March 31,2014	New position to evaluate, prioritize, and optimally allocate capital investment for gas transmission and storage assets
Gas AMI	OG4	LU	39D	5	Gas Regulator Repairman	March 31,2014	Installation of the new gas AMI equipment and ongoing operations and maintenance
Gas Regulation, SCADA and Metering	OG4	LM	82N	1	Administration	January 31, 2014	Additional resource to support administrative and compliance work documentation related to Gas SCADA inspections, calibrations, and tech services regulation and measurement coordination of operational inspections and maintenance
Transmission and Distribution Integrity	OG5	LM	82P	6	Engineer	3 - January 31, 2014; 3- June 30, 2014	Additional resources to perform identification, analysis, engineering, and project management activities for distribution and transmission integrity management related projects, risk mitigation activities, and support for the execution of the programs
Storage Field Engineering and Operations	OG6	LM	86E	2	Engineer	1- January 31, 2014; 1 - June 30, 2014	Additional resources to perform additional gas storage well logging, well testing, and reservoir simulation engineering, analysis, and project management
Storage Field Engineering and Operations	OG6	LU	39E	1	Storage Field Operator	March 31, 2014	Additional operator for Shanghai storage field operations, maintenance, and construction and additional forecasted capital projects
Pipeline Safety Public Education	OG7	LM	83P	1	Public Awareness Specialist	January 31, 2014	Additional resource to expand the outreach and education on pipeline safety to fire/police/public that is outlined in the Public Awareness/Education Program
Quality Assurance		LM	89J	1	Quality Assurance Consultant	January 31, 2014	Additional resource to increase the number of gas pipeline safety quality assurance inspections and audits completed each year on employees and contractors

Program	RMC	RT	Payroll Department	2014 Added Headcount	Job Description/Function	Proposed Date(s) to Fill Position(s)	Reason for Position(s)
Gas O&M and Standards/Materials	OG8	LM	906	3	Records Management	March 31, 2014	Additional resources for records and data management related to Transmission and Distribution MAOP records, data and records integrity controls, and records development. The positions are to complete additional work to improve data accuracy and integrity management records and conform to new standards of having traceable, verifiable, and complete data and records on transmission pipelines
	Total			21			

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/29/2013**

AG 12.12

Ref: Ameren Ex. 7.0, lines 1191 to 1213 (Distribution Activities and Costs). The referenced testimony contains a bullet-point listing of “Distribution O&M activities planned for 2014 and the approximate associated expenses budgeted for each activity.” Please provide the following additional information:

- a) For each bullet item listed, provide a breakdown of the estimated expense by Resource Type (“RT”) and RMC.
- b) For each bullet item, explain how each element of the test year expense estimate was developed. This explanation should explain how staffing and labor hour estimates were developed and how each type of contractor or material cost was estimated.
- c) Provide a side-by-side comparison of the test year estimated O&M expense for each bullet item by RT and RMC to comparable actual expenses incurred in 2011 and in 2012 for each bullet item (by RT and RMC).
- d) Explain the reasons for known variations in the costs of Distribution O&M activities between years in your response to part (c).
- e) Provide copies of supporting statistics, reports, analyses, workpapers and other documents associated with your response to part (d).

RESPONSE

**Prepared By: Stephen R. Colyer
Title: Sr. Director, Gas Operations & Services
Phone Number: 217-424-6933**

Please see AG 12.12 Attach. Please note Ameren Illinois also provided additional support for the forecasted increase in Distribution Expense by FERC Account in response to data requests AG 9.4 and ENG 3.01.

AG 12.12 Summary
 Ex. 7.0 lines 1191 - 1213
 Distribution O&M

a.					b.	c.					d.							
Bullet	Topic	2014 Amount	RMC	RT Breakdown	How Estimated	2011 Amount	RMC	RT Breakdown	2012 Amount	RMC	RT Breakdown	Variance Explanation						
1	Various Gas personnel	\$ 2,900,000	OG5	EC		Current level plus additional work outlined in testimony Ex. 7.0 lines 1176 through 1188	\$ 1,600,000	OG5	EC	\$ 180,000	\$ 2,100,000	OG5	EC	\$ 250,000	Increase in resources necessary to perform identification, analysis, engineering, and project management related to executing the DIMP and TIMP program requirements. Recent integrity management regulations as well as new federal regulations are forthcoming that are based upon the legislation requirements passed by Congress in December 2011. Please AG 13.3 Attach 1, which summarizes the new requirements passed by Congress in December 2011. It is anticipated that the new regulations will result in significant additional work requirements, and consequently the need for additional engineering resources, to complete activities including transmission pipeline replacements, hydrostatic testing of pipelines, and expansion of TIMP requirements. Increase in resources for additional activities related to pipeline safety quality assurance and training programs. Increase in resources for records and data management related to transmission and distribution maximum allowable operating pressure (MAOP) records, data and records validation, data quality controls, and records development. These include resources to complete additional work to improve data accuracy and integrity management records and conform to new standard of having traceable, verifiable, and complete data and records on transmission pipelines			
				BX	\$ 70,000				BX	\$ 245,000			BX	\$ 240,000				
				LM	\$ 730,000				LM	\$ 480,000			LM	\$ 630,000				
				EC	\$ 130,000				EC	\$ 130,000			EC	\$ 130,000				
				BX	\$ 190,000				BX	\$ 163,000			BX	\$ 165,000				
				LM	\$ 1,100,000				LM	\$ 385,000			LM	\$ 650,000				
			OG7															
			OG8	LM														
					\$ 626,000													
2	Integrity Management - Gas Leak Repair	\$ 1,300,000	OG5	EC	\$ 1,300,000	Projected costs for known and planned leaks repairs		OG5	EC		OG5	EC	Costs based on DIMP program requirements developed in 2012 for additional and accelerated leaks repairs explained in Exhibit 7.0 lines 267-270.					
3	Integrity mgt. - data conversion & field Surveys	\$ 1,100,000	OG5	EC	\$ 1,100,000	Contractor estimate and internal cost projection for data conflation and clean-up	\$ -	OG5	EC	\$ -	OG5	EC	Additional project work initiated in 2013 which will be ongoing in 2014 and subsequent years for data development and validation necessary to support the integrity management programs					
4	EAM & MWM	\$ 1,500,000	OG5	EX	\$ 900,000	Internal IT project estimate	\$ -	OG5	EX	\$ 250,000	OG5	EX	O&M expense related to a new information technology software project outlined in the F-4 schedule (Ameren Ex. 7.1). Project was initiated in 2012 with program scope and initial software selection. Detailed design development and implementation began in 2013 and will be completed in 2014.					
				ET	\$ 600,000												ET	\$ 250,000
					\$ 600,000								\$ 250,000					
5	HPD Clearing	\$ 1,200,000	676	EC	\$ 1,200,000	Based on planned miles of distribution pipeline rights of way to clear	\$ 50,000	676	EC	\$ 50,000	\$ 170,000	676	EC	\$ 170,000	Additional High Pressure Distribution Right of Way clearing for leak survey inspections and DIMP program.			
6	Sewer Cross Bores	\$ 550,000	OG5	EC	\$ 550,000	Estimate of number of inspections and cost per inspection.	\$ -	OG5	EC	\$ -	\$ 90,000	OG5	EC	\$ 90,000	Project work initiated in 2011 and 2012. \$150,000 was budgeted to increase the number of inspections in 2013 and again increase the number of inspections in 2014. Reference Direct Testimony Exhibit 7.0 lines 253-318 and line 1206			
				EC	\$ 650,000								EC	\$ 326,000				

Bullet	Topic	2014 Amount	RMC	RT	Breakdown	How Estimated	2011 Amount	RMC	RT	Breakdown	2012 Amount	RMC	RT	Breakdown	Variance Explanation
7	Damage Prevention (Watch and Protect)	\$ 1,500,000	93R	LM		Planned staffing for projected 3rd party excavation volume and work load	\$ 2,000	93R	LM		\$ 326,000	93R	LM		The amount reflects full implementation of a third-party excavator damage prevention program ("Watch and Protect") to enhancing public safety, system integrity, and reliability by reducing third-party damage. The program began in 2011 and was expanded in 2012 with the addition of five positions. The program is part of the DIMP program additional and accelerated actions to mitigate the top threat to the integrity of the gas system which is excavation damage.
					\$ 850,000					\$ 164,000				\$ 302,000	
			OG4	EC	\$ 700,000										
8	Atmospheric Corrosion painting	\$ 1,000,000	676	EC		Estimate based on number of sites and facilities to paint	\$ 184,000	676	EC		\$ 400,000	676	EC		Additional corrosion control project work identified during inspection and maintenance activities and includes continuous maintenance of above ground pipe coatings in subsequent years.
					\$ 300,000					\$ 184,000				\$ 400,000	
				EC	\$ 3,100,000					\$ 1,900,000			EC	\$ 2,150,000	
9	JULIE requests	\$ 3,200,000	93R	LU		Historical JULIE locate request volume and cost per locate	\$ 2,000,000	93R	LU		\$ 2,250,000	93R	LU		Cost varies based on projected number of locate requests and cost per locate.
					\$ 100,000					\$ 100,000				\$ 100,000	
10	Dist. Leak Survey	\$ 600,000	676	EC		Based on miles of pipe in current year to survey	\$ 450,000	676	EC		\$ 700,000	676	EC		Cost varies based on number of miles of pipe scheduled to be surveyed in a given year and cost of surveys.
					\$ 600,000					\$ 450,000				\$ 700,000	

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/30/2013**

AG 13.01

Ref: AIC Responses to AG 5.01, Confidential Attachment 20; AG 10.02 (RMC 067 AIC Emergency Response). According to this Attachment, significantly higher labor hours are forecasted for the 2014 test year than were actually incurred in calendar 2012. Please provide the following additional information:

- a) Describe the general scope of activities and geographic area of operations included within the responsibilities of employees in this RMC.
- b) Provide the average actual headcount in this RMC in 2012, compared to the forecasted headcount level for the 2014 test year, quantifying how many full time equivalent employees are proposed to be added subsequent to 2012.
- c) Explain each reason why the Company has budgeted higher staffing levels in this RMC for 2014, compared to the staffing levels actually incurred in 2012.
- d) Provide complete copies of the most detailed available supporting analysis of the Company's need for additional labor hours in this RMC, including all available statistical data, work backlog information, identification/quantification of inadequacies in 2012 actual staffing and internal documentation supportive of the proposed expanded staffing.
- e) For the test year, provide a distribution of the forecasted labor hours for this RMC between gas O&M expenses, electric O&M expenses, construction and other balance sheet accounts, and any other (explained) accounting distribution.
- f) For the test year, provide the approximate amount of labor expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- g) For the test year, provide the approximate amount of labor-related pension, benefits, payroll taxes and other indirect expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- h) Explain whether the vacancy calculations described in your response to AG 10.02 included any provision for vacancies in this RMC.
- i) If the response to part (h) is affirmative, provide the approximate labor hours and gas expense amounts for the vacancy estimate should be attributed to this RMC and provide assumptions and calculations supportive of your response.

RESPONSE

Prepared By: Ronald D. Pate

Title: Vice President Operations & Technical Services

Phone Number: 217-424-6518

- a) The general scope of activities and geographic area of operations included within the responsibilities of the employees in RMC 067 at the time of this filing included the general management of the distribution control function which covers both electric and gas operations plus the management of the electric Emergency Operations Center. The geographic area of operations covered by this RMC is the company's total service territory. Due to organizational reporting structure changes from a recent retirement of the Distribution Control Director, in March 2013, the RMCs were restructured to mirror the new reporting structure changes. The employees for the general management and supervision of the distribution control and dispatching function were moved to the other RMCs under the Distribution Control Function in 2012 and 2013. RMC 067 was renamed to AIC Emergency Response and now contains only the electric Emergency Operations Center employees.
- b) Please see AG 13.01 Attach 1. Please note that in addition to 2012 average, 2012 year end staffing is included to provide more relevance to current and future staffing levels. Additionally, the headcount is based on the rollup to each RMC as provided in Confidential Attachment 20 to AG 5.01 and therefore includes both electric and gas employees.
- c) Please see AG 13.01 Attach 1.
- d) Please see AG 13.01 Attach 1, AG 12.03, and subpart a) of AG 12.04 (dated May 29, 2013).
- e) Please see AG 13.01 Attach 2 but note the report came from the budget system and does not include the any labor adjustments as referenced in subpart c) of AG 5.08 that are contained in subpart g) of AG 5.01 (dated April 23, 2013). Also, this data was an input to the FERC derivation process, which is utilized to determine Operation and Maintenance accounts. See AG 5.05 (dated April 23, 2013) for documentation on the derivation process.
- f) The requested analysis does not exist. AIC does not budget by rate zone. Please see Ameren Exhibit 2.0, lines 548-558, for discussion of how AIC has operating expenses across rate zones to calculate a revenue requirement by rate zone.
- g) The requested analysis does not exist. AIC does not budget by rate zone. Please see Ameren Exhibit 2.0, lines 548-558, for discussion of how AIC has operating expenses across rate zones to calculate a revenue requirement by rate zone.
- h) Please see subpart a) of AG 12.01 (dated May 29, 2013).
- i) Not applicable

AG 13			b.							c.	
Response	RMC	Description	Avg 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Forecast	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)	
13.1	067	AIC Emergency Response	7	4	6	9	9	3	0	The structure of RMC 067 was changed in March 2013, after the initial filing; see AG 13.1 a) for further explanation. RMC 067 is now only electric and represents 6 Emergency Operations Center employees, substantiated per Liberty Audit - Recommendation III-02. While the delta between the April 2013 headcount and the 2014 forecast shows a difference of three based on the original 2014 forecast, the true delta is zero; three positions have been moved into RMC 195.	
13.7	2MS	Div. IV Support Staff	295	291	292	311	318	26	7	Average headcount was 295 for 2012. Approved Modernization Action Plan (MAP) additions for 2012 totaled 6 (3 linemen; 2 Elect Eng.'s, 1 Elect Op Supv) and 6 add heads (included 3 linemen apprentices (apprentice planning due to aging workforce); 1 OSA/Tuscola ; and 2 Op Coordinators (Enabling Supervisor's Pilot) which would have brought total to 319. Decision was made to not fill Survey Tech budgeted position (employee approved for LTD in 2012) which brought total headcount with all open reqs filled to 318 which was budgeted headcount number for 2013 and beyond. With the AMI rollout, it has been decided to not fill meter reader positions as employees leave that position so 7 positions have been removed from the forecast thru 2019 and new headcount total is currently 311 once all positions are filled. Average headcount does not account for job postings and open requisitions. Contractors were used to complete mandatory work. Additional electric lineman, electric supervision and electric engineering staffing levels directly correlated to increase in reliability demands, circuit inspection requirements, and MAP legislation approval and the additional projects as a result.	
13.8	3MS	Div. V Support Staff	204	208	211	217	216	5	-1	2014 budget compared to 2012. The addition to headcount in engineering and electric linemen are necessary with increased budgeted electric division work. In 2012 division averaged 204 and ended the year with 208 employees, utilizing	

Response	RMC	Description	Avg 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Forecast	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)
13.9	667	Div. III Support Staff	175	178	174	184	184	10	0	AIC added 4 MAP positions to the 2014 budget vs. the 2012 budget. The 2014 budget is higher than average 2012 actual because of the MAP additions and because of temporary understaffing in 2012 due to attrition.
13.10	669	Div. I Support Staff	284	282	285	308	308	23	0	Div. I Support Staff has open requisitions of 19 to fill open positions that have been vacated due to natural attrition. The additional 4 positions are electric apprentices for retirement planning.
13.12	675	ITS Administration	7	24	6	10	9	3	-1	There are 3 full time equivalent employees proposed to be added subsequent to 2012. These additional 3 full time equivalent employees includes: 1 clerical position and 2 project control positions. These positions are needed to provide additional support to the T&D group which is an electric group. Please note the Dec 2012 headcount of 24 was a temporary situation as a result of organizational changes.
13.13	676	IOS Gas Op & EI Main	5	5	4	10	10	6	0	These additional 6 new positions are for inspecting gas construction work performed by contractors. The positions are necessary to perform the necessary and required inspection work performed by contractors and are being added in anticipation of the capital expenditures forecasted in 2014 and subsequent years.
13.14	682	IL Operations Support	8	8	8	12	12	4	0	These additional 4 full time equivalent employees are needed to manage and/or support the increase in contractor work load. This is increased headcount will primarily support electric operations.
13.15	91U	Div. VI Support Staff	358	369	362	383	383	21	0	The 2014 budget is higher than average 2012 actual because of MAP additions and temporary understaffing in 2012 due to attrition. Division added 7 MAP positions to 2014 budget vs. the 2012 budget. The remaining difference is due to temporary understaffing in 2012 due to attrition.

Response	RMC	Description	Avg 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Forecast	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)
13.17	93R	DDC	90	102	101	108	108	7	0	In 2012, the average headcount was 90 employees compared to 108 employees forecasted in 2014. The additional 18 employees (15 distribution design employee and 3 damage prevention employees) are forecasted to support damage prevention, MAP, Liberty Audit, and baseline work activities. Several positions had been filled by the end of April 2013, with the remaining 7 forecasted to be filled by the end of 2013.
Total			1433	1471	1449	1552	1557	108	5	

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/30/2013**

AG 13.02

Ref: AIC Responses to AG 5.01, Confidential Attachment 20; AG 10.02 (RMC OG4 Gas Tech-Operations). According to this Attachment, significantly higher labor hours are forecasted for the 2014 test year than were actually incurred in calendar 2012. Please provide the following additional information:

- a) Describe the general scope of activities and geographic area of operations included within the responsibilities of employees in this RMC
- b) Provide the average actual headcount in this RMC in 2012, compared to the forecasted headcount level for the 2014 test year, quantifying how many full time equivalent employees are proposed to be added subsequent to 2012.
- c) Explain each reason why the Company has budgeted higher staffing levels in this RMC for 2014, compared to the staffing levels actually incurred in 2012.
- d) Provide complete copies of the most detailed available supporting analysis of the Company's need for additional labor hours in this RMC, including all available statistical data, work backlog information, identification/quantification of inadequacies in 2012 actual staffing and internal documentation supportive of the proposed expanded staffing.
- e) For the test year, provide a distribution of the forecasted labor hours for this RMC between gas O&M expenses, electric O&M expenses, construction and other balance sheet accounts, and any other (explained) accounting distribution.
- f) For the test year, provide the approximate amount of labor expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- g) For the test year, provide the approximate amount of labor-related pension, benefits, payroll taxes and other indirect expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- h) Explain whether the vacancy calculations described in your response to AG 10.02 included any provision for vacancies in this RMC.
- i) If the response to part (h) is affirmative, provide the approximate labor hours and gas expense amounts for the vacancy estimate should be attributed to this RMC and provide assumptions and calculations supportive of your response.

RESPONSE

Prepared By: Stephen R. Colyer

Title: Sr. Director Gas Operations & Services

Phone Number: 217-424-6933

- a) RMC 0G4 Gas Tech-Operations geographic area of responsibilities encompasses the entire AIC service territory footprint. Gas Tech-Operations is responsible for gas construction, operations, and maintenance activities including but not limited to industrial/commercial metering, supervisory control and data acquisition (SCADA), odorization, custody transfer measurement, pressure regulation, and system controls, system pressure monitoring and associated telecommunications, high pressure tapping and stopping, station leak surveys, industrial/commercial meter testing and repair, atmospheric corrosion monitoring and mitigation, painting, greenhouse gas reporting surveys, coatings, and emergency response.
- b) Please see AG 13.02 Attach 1. Please note that in addition to 2012 average, 2012 year end staffing is included to provide more relevance to current and future staffing levels.
- c) Please see AG 13.02 Attach 1.
- d) Please see AG 13.02 Attach 1, AG 12.03 (dated May 29, 2013), and subpart a) of AG 12.04.
- e) Please see AG 13.02 Attach 2 but note the report came from the budget system and does not include the any labor adjustments referenced in subpart c) of AG 5.08 (dated April 23, 2013) that are contained in subpart g) of AG 5.01 (dated April 23, 2013). Also, this data was an input to the FERC derivation process, which is utilized to determine Operation and Maintenance accounts. See AG 5.05 dated (April 23, 2013) for documentation on the derivation process.
- f) The requested analysis does not exist. AIC does not budget by rate zone. Please see Ameren Exhibit 2.0, lines 548-558, for discussion of how AIC has operating expenses across rate zones to calculate a revenue requirement by rate zone.
- g) The requested analysis does not exist. AIC does not budget by rate zone. Please see Ameren Exhibit 2.0, lines 548-558, for discussion of how AIC has operating expenses across rate zones to calculate a revenue requirement by rate zone.
- h) Please subpart a) of AG 12.01 (dated May 29, 2013).
- i) Not applicable

AG 13.2 Attach 1		b.									c.
Response	RMC	Description	Average 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Actual	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)	
13.2	0G4	Gas Tech-Operations	58	59	67	68	74	7	6	<p>As of December 2012 the actual staffing level was 59 positions. As of April 2013, the Company has an actual staffing level in this RMC of 67 versus a budgeted staffing level of 68 positions. In 2013, staffing was increased by 8 position to implement changes to the International Brotherhood of Electrical Workers (IBEW) contracts. The contract changes modified job qualifications and responsibilities related to the performance of pressure control (regulator station), and supervisory control and data acquisition (SCADA) activities. The forecasted staffing level for 2014 is 74 positions. The addition of 6 positions in 2014 is as follows:</p> <ul style="list-style-type: none"> - 1 additional position to provide administrative support for pipeline safety inspection and compliance documentation related to Supervisory Control and Data Acquisition (SCADA) inspections, calibrations, and coordination, scheduling, and documentation for gas regulation, metering and instrumentation inspection and maintenance activities. There is an increased volume of work due to inspections of ERX pressure monitoring devices and more frequent inspections and maintenance related to SCADA installations and additional work related to new control room requirements including SCADA point to point verification processes. - 5 additional positions to perform installation and ongoing operations and maintenance associated with the implementation of the gas advanced metering infrastructure (AMI) project. 	
13.3	0G5	Gas Tech-Engineering	42	45	49	56	62	13	6	<p>As of December 2012 the actual staffing level was 45 positions. As of April 2013, the Company has an actual staffing level in this RMC of 49 versus a budgeted staffing level of 56 positions. In addition to the staffing level of 49, two additional job offers have been accepted and three more job offers are in the process of being extended with anticipated start dates in June 2013 and July 2013. In 2013 staffing was increased by 6 positions to perform new, additional work including identification, analysis, engineering, and project management related to executing the DIMP and TIMP program requirements. In 2014, 6 additional positions are being added to support additional design and engineering associated with capital expenditures planned in 2014 and in future years. Additionally there are new federal regulations forthcoming that are based upon the legislation requirements passed by Congress in December 2011. It is anticipated that the new regulations will result in significant additional work requirements including transmission pipeline replacements, hydrostatic testing of pipelines, and expansion of TIMP requirements. The additional positions in 2014 are necessary to complete these additional work activities. Please AG 13.3 Attach 1, which summarizes the new requirements passed by Congress in December 2011.</p>	

Response	RMC	Description	Average 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Actual	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)
13.4	0G6	Gas Storage	36	37	40	44	47	7	3	As of December 2012 the actual staffing level was 37 positions. As of April 2013, the Company has an actual staffing level in this RMC of 40 versus a budgeted staffing level of 44 positions. The increase in staffing between 2012 and 2014 includes additional internal engineering resources to perform additional reservoir management and modeling activities. These activities are described in lines 1346 – 1351 of Ameren Exhibit 7.0. The additional reservoir modeling is necessary to better understand and strengthen the reservoir management activities for the Sciota, Centralia, and Glasford storage fields. Additional engineering resources are identified to expand the gas storage well logging and well testing programs that are necessary to ensure the reliability and performance of the wells and to identify potential corrosion that could affect the integrity of the well bore. Additional supervisory resources are in the process of being added in 2013 due to the significant attrition in storage operators that has occurred and is anticipated to continue, which includes retirements. Approximately one third of the operators working at the storage fields are or will be new in their positions. With a large percentage of new inexperienced operators across many of the storage fields, the additional supervisory resources are necessary due to the additional time commitment and oversight that is necessary to ensure the training, development, knowledge transfer and performance evaluation of the new personnel is completed. The additional supervisory resources are also needed to oversee the additional project work forecasted at the storage fields, compared to previous years, including but not limited to additional pigging activities, Sulfatreat cleanouts, integrity management projects, training requirements, operator qualification requirements, individual well measurement projects, and corrosion monitoring activities. Also, see AG 9.04 response which refers to ENG 3.01 Attach_Gas Storage as a reference.
13.5	0G7	Gas Compliance & Training	8	10	19	22	24	5	2	The response for 0G7 and 0G8 is a combined response. As of December 2012 the actual staffing level was 10 for 0G7 and 0 for 0G8. As of April 2013, the Company has an actual staffing level of 19 for 0G7 and 5 for 0G8 versus a combined budgeted staffing level for these RMC's of 29 positions. Due to a change in organizational structure that was reflected in the forecast at the beginning of 2013, staffing levels were modified between RMC's. 12 positions were transferred from RMC 232 to 0G7 and 5 positions were transferred from 0G7 to 0G8. Between 2013 and 2014 three additional positions are forecasted in 0G8 for records and data management related to transmission and distribution MAOP records, data and records integrity controls, and records development. The positions are necessary to complete additional work to improve data accuracy and integrity management records and conform to new standards of having traceable, verifiable, and complete data and records on transmission pipelines. Between 2013 and 2014, two additional positions are forecasted in 0G7 to expand the outreach and education on pipeline safety to fire/police/public that is outlined in the Public Awareness/Education Program and support gas training and compliance activities. In addition, two new positions are being added in 2013 in 0G7 to support additional gas training and qualification volumes that are occurring due to retirements and other attrition that has resulted in a large number of gas apprentices that are going through the 27-36 month apprentice training. At the end of 2011 there were 37 gas apprentices, 70 gas apprentices at the end of 2012, and 91 gas apprentices as of the end of April 2013. 7 more gas apprentices were hired in May 2013 and 3 gas apprentices completed the program.
13.6	0G8	Gas Standards & Procedures	0	0	5	6	9	4	3	

Response	RMC	Description	Average 2012 Actual Headcount	December 2012 Actual Headcount	April 2013 Actual Headcount	2013 Forecasted Headcount	2014 Forecasted Headcount	Delta 2014 Forecast & April 2013 Actual	Delta 2014 Forecast & 2013 Forecast	Reason for Position(s)
13.11	673	Gas Control	17	19	16	19	19	3	0	As of December 2012 the actual staffing level was 19 for RMC 673. As of April 2013 the Company has an actual staffing level of 16. In addition to the staffing level of 16, two additional job offers have been accepted with anticipated start dates in May 2013 and June 2013. These positions were filled due to attrition. Between 2012 and 2014, the budgeted staffing has been increased by 1 position. This position is necessary to complete added administrative requirements related to SCADA alarm record keeping, control room management compliance documentation, report generation, and assistance in daily operations.
13.16	92L	Fleet Services	58	62	58	66	66	8	0	As of December 2012 the actual staffing level was 62 for RMC 92L. As of April 2013 the Company has an actual staffing level of 58 versus a budgeted staffing level of 66. Fleet Services has experienced significant attrition primarily due to personnel, that perform work on electric and gas vehicles and equipment, taking other positions within the Company, as well as some retirements. All 66 positions are approved to be filled in 2013 and are actively being pursued to be filled consisting of recruitment of experienced mechanics, testing, and selection process, except for one position which is a new position. Between 2012 and 2014, the budgeted staffing has been increased by this 1 position. This position is anticipated to be filled in the third quarter of 2013 and is necessary to administer the implementation and ongoing operation of a telematics hardware and software system being selected and implemented in 2013 and 2014.
Total			219	232	254	281	301	47	20	

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 5/30/2013**

AG 13.03

Ref: AIC Responses to AG 5.01, Confidential Attachment 20; AG 10.02 (RMC OG5 Gas Tech-Engineering). According to this Attachment, significantly higher labor hours are forecasted for the 2014 test year than were actually incurred in calendar 2012. Please provide the following additional information:

- a) Describe the general scope of activities and geographic area of operations included within the responsibilities of employees in this RMC.
- b) Provide the average actual headcount in this RMC in 2012, compared to the forecasted headcount level for the 2014 test year, quantifying how many full time equivalent employees are proposed to be added subsequent to 2012.
- c) Explain each reason why the Company has budgeted higher staffing levels in this RMC for 2014, compared to the staffing levels actually incurred in 2012.
- d) Provide complete copies of the most detailed available supporting analysis of the Company's need for additional labor hours in this RMC, including all available statistical data, work backlog information, identification/quantification of inadequacies in 2012 actual staffing and internal documentation supportive of the proposed expanded staffing.
- e) For the test year, provide a distribution of the forecasted labor hours for this RMC between gas O&M expenses, electric O&M expenses, construction and other balance sheet accounts, and any other (explained) accounting distribution.
- f) For the test year, provide the approximate amount of labor expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- g) For the test year, provide the approximate amount of labor-related pension, benefits, payroll taxes and other indirect expense that is included in the asserted revenue requirement for each rate zone in connection with the projected total labor hours for this RMC.
- h) Explain whether the vacancy calculations described in your response to AG 10.02 included any provision for vacancies in this RMC.
- i) If the response to part (h) is affirmative, provide the approximate labor hours and gas expense amounts for the vacancy estimate should be attributed to this RMC and provide assumptions and calculations supportive of your response.

RESPONSE

**Prepared By: Stephen R. Colyer
Title: Sr. Director Gas Operations & Services
Phone Number: 217-424-6933**

- a) RMC 0G5 Gas Tech-Engineering geographic area of responsibilities encompasses the entire AIC service territory footprint. Gas Tech-Engineering is responsible for activities including but not limited to project development, engineering, design, and project management, as well as ongoing operations and maintenance engineering and technical support, for the AIC gas transmission system, high pressure distribution system, measurement and pressure control facilities, odorization, and supervisory control and data acquisition (SCADA) facilities and equipment. Other Company wide activities and functions within Gas Tech-Engineering include corrosion control monitoring, transmission and distribution system planning, and development and execution of the gas transmission and distribution integrity management programs. Additionally, there are new federal regulations forthcoming that are based upon the legislation requirements passed by Congress in December 2011. The new regulations will result in significant additional work requirements, including transmission pipeline replacements, hydrostatic testing of pipelines, and expansion of TIMP requirements. The additional positions in 2014 are necessary to complete these additional work activities. Please see AG 13.3 Attach 1, which summarizes the new requirements passed by Congress in December 2011.
- b) Please see response to AG 13.02 Attach 1.
- c) Please see response to AG 13.02 Attach 1.
- d) Please see response to AG 13.02 Attach 1, AG 12.03 (dated May 29, 2013), and subpart a) of AG 12.04 (dated May 29, 2013).
- e) Please see response to subpart e) of AG 13.02.
- f) Please see response to subpart f) of AG 13.02.
- g) Please see response to subpart g) of AG 13.02.
- h) Please see response to subpart h) of AG 13.02.
- i) Please see response to subpart i) of AG 13.02.

American Gas Association Summary of the Pipeline Safety, Regulatory Certainty, and Job Creation Act of 2011 Passed by Congress on December 13, 2011

SECTION	SUMMARY	DEADLINE
SEC. 2. CIVIL PENALTIES	<ul style="list-style-type: none"> • Increased from \$100,000 per day/ \$1,000,000 per related series of violations to \$200,000 per day/\$2,000,000 per related series of violations • Eliminates “ability to pay” limitation • Operator Assistance in Investigations- If DOT or NTSB investigates an accident or incident involving a pipeline facility, the operator must make all records and information pertaining to the accident or incident available, including integrity management plans and test results • Allows DOT to impose a civil penalty on a person who obstructs inspections or investigations • Clarifies that maximum civil penalties for administrative enforcement actions do not apply to enforcement actions under this section 	
SEC.3. PIPELINE DAMAGE PREVENTION.	<ul style="list-style-type: none"> • Defines the minimum standards for a State one-call program to qualify for grants. Amendments effective 2 yrs. after enactment. In order to qualify for a Federal grant, a State program must include: <ul style="list-style-type: none"> • Appropriate participation by all underground operators, including all government operators • Appropriate participation by all excavators, including government and contract excavators • Flexible and effective enforcement under State law with respect to participation in, and use of one-call notification systems • May not exempt municipal, State agencies , or their contractors from one-call notification requirements • Requires DOT to conduct a study on the impact of excavation damage on pipeline safety, and report to Congress not later than 2 yrs. after enactment. The study must include: <ul style="list-style-type: none"> • Analysis of frequency and severity of different types of excavation damage incidents • Analysis of exemptions to one-call notification requirements in each State • Comparison of exemptions to one-call requirements to types of excavation incidents in each State • Analysis of potential safety benefits and adverse consequences of eliminating all exemptions for mechanized excavation from State one-call notification systems 	<p>Amendments effective 2 years after enactment</p> <p>Report to Congress not later than 2 years after enactment</p>

SEC.4. AUTOMATIC AND REMOTE-CONTROLLED SHUT-OFF VALVES.	<ul style="list-style-type: none"> • Mandates DOT, not later than 2 yrs. after enactment and if appropriate, to require by regulation the use of automatic or remote-controlled shut-off valves, or equivalent technology, where economically, technically, and operationally feasible on transmission pipeline facilities constructed or entirely replaced after DOT issues the final rule • Requires the Comptroller General of the US to conduct a study on the ability of transmission pipeline operators to respond to a HL or gas release from a pipeline segment located in a HCA and report to Congress not later than 1 yr. after enactment. The study must consider the swiftness of leak detection and pipeline shutdown capabilities, location of the nearest response personnel, and the costs, risks and benefits of installing automatic and remote-controlled shut-off valves 	<p>Regulation, if any, not later than 2 years after enactment</p> <p>Report to Congress not later than 1 year after enactment</p>
SEC.5. INTEGRITY MANAGEMENT.	<ul style="list-style-type: none"> • Requires the DOT to evaluate, not later than 18 mos. after enactment: <ul style="list-style-type: none"> • Whether TIMP requirements, or elements thereof, should be expanded beyond HCAs; and • If applying TIMP requirements, or elements thereof, to additional areas would mitigate the need for class location requirements • The DOT evaluation must include the following factors: <ul style="list-style-type: none"> • Continuing priority to enhance protections for public safety • Continuing importance of reducing risk in HCAs • Incremental costs of applying IM standards to pipelines outside of HCAs where operators are already conducting assessments beyond requirements • The need to perform IM assessments and repairs in a manner that is achievable and sustainable, and that does not disrupt pipeline service • Options for phasing in extension of IM requirements beyond HCAs, including effective/efficient options for decreasing risks to an increasing number of people in proximity to pipelines • Appropriateness of applying repair criteria, such as pressure reductions and requirements for scheduling remediation, to areas that are not HCAs • Requires DOT to submit a report to Congress, based on the evaluation above, not later than 2 yrs. after enactment, regarding: <ul style="list-style-type: none"> • Expansion of IM requirements, or elements thereof, beyond HCAs • Whether applying IM requirements, or elements thereof, to additional areas would mitigate the need for class location requirements • Requires DOT to issue regulations as soon as practical, after the Congressional “review period”, if the evaluation finds that IM requirements, or elements thereof, should be expanded beyond HCAs and if applying IM requirements, or elements thereof, to additional areas would mitigate the need for class location requirements. The “review period” is the earlier of 1 yr. after completion of the report or 3 yrs. after enactment. The regulation, if any, issued by DOT would: <ul style="list-style-type: none"> • Expand IM system requirements, or elements thereof, beyond HCAs; and • Remove redundant class location requirements for gas transmission pipeline facilities regulated under an IM program 	<p>Evaluation not later than 18 months after enactment</p> <p>Report to Congress not later than 2 years after enactment</p> <p>Regulations, if any, as soon as practical after Congressional review. Review period is earlier of 1 year after report or 3 years after enactment</p>

	<ul style="list-style-type: none"> • Note: Notwithstanding the review period, DOT may issue IM regulations if a condition that poses a risk to public safety or an imminent hazard exists • Confirms requirements for periodic IM reassessments at a minimum of once every 7 calendar years. DOT may extend reassessments an additional 6 months if an operator submits written notice with sufficient justification • Requires the Comptroller General of the US to evaluate and report to Congress not later than 2 yrs. after enactment: <ul style="list-style-type: none"> • Whether risk-based reassessment intervals are more effective for managing risks to pipelines in HCAs than the 7 yr. reassessment interval, once the baseline assessments are complete • Number of anomalies found in baseline assessments compared to reassessments • Progress made in implementing recommendations in GAO Report 06-945 and current relevance of recommendations not yet implemented • Requires operators to consider seismicity of the area in identifying and evaluating threats to a pipeline segment (SEC.29.) 	<p>IM reassessments every 7 years</p> <p>Report to Congress not later than 2 years after enactment</p>
<p>SEC.6. PUBLIC EDUCATION AND AWARENESS.</p>	<ul style="list-style-type: none"> • Requires DOT to maintain, as part of the NPMS, a map of designated HCA areas where operators must meet IM regulations, excluding proprietary and sensitive security information. Maps to be updated biennially • Requires DOT, not later than 1 yr. after enactment, to develop and implement a program promoting greater awareness of the NPMS to State and local emergency responders and other interested parties • Requires DOT, not later than 18 mos. after enactment, to provide guidance to owners and operators of pipeline facilities on the importance of providing system-specific information about those facilities to emergency response agencies. DOT to consult with owners/operators to determine what information is currently provided 	<p>Program not later than 1 year after enactment</p> <p>Guidance not later than 18 months after enactment</p>
<p>SEC.7. CAST IRON GAS PIPELINES.</p>	<ul style="list-style-type: none"> • Requires DOT, not later than 12/31/2012 and every two years thereafter, to conduct a follow-up survey to measure the progress that owners and operators have made in adopting and implementing plans for the safe management and replacement of CI pipelines • Requires DOT, not later than 12/31/2013, to submit a report to Congress that: <ul style="list-style-type: none"> • Identifies the total mileage of CI gas pipelines in the US; and • Evaluates the progress that owners and operators have made in implementing their plans for the safe management and replacement of CI gas pipelines 	<p>Survey not later than 12/31/2012 / every 2 years thereafter</p> <p>Report to Congress not later than 12/31/2013</p>
<p>SEC.9. ACCIDENT AND INCIDENT NOTIFICATION.</p>	<ul style="list-style-type: none"> • Requires DOT to revise regulations under 191.5, not later than 18 mos. after enactment, to establish time limits for telephonic or electronic notice of accident and incidents to DOT and the National Response Center (NRC) • In revising the regulations DOT will, at a minimum: <ul style="list-style-type: none"> • Establish time limits for notification at the earliest practicable moment, not later than 1 hour, following the time of confirmed discovery 	<p>Regulations not later than 18 months after enactment</p>

	<ul style="list-style-type: none"> • Review procedures of pipeline owners and operators and NRC to provide coordinated notification to all State and local emergency response officials, including 911 call centers, and revise the procedures as appropriate • Require owners and operators to revise the initial notice to DOT and the NRC, within 48 hours of the accident or incident to the extent practicable, with an estimate of the amount of product released, the number of fatalities and injuries, if any, and any other information deemed appropriate by DOT. Based on this updated information, the NRC will update the initial report, rather than issue a new report 	
SEC.11. PIPELINE INFRASTRUCTURE DATA COLLECTION.	<ul style="list-style-type: none"> • Expands the information that operators must submit to the NPMS to include any other geospatial or technical data that DOT determines necessary. Public disclosure of information is limited. 	
SEC.13. COST RECOVERY FOR DESIGN REVIEWS.	<ul style="list-style-type: none"> • Allows DOT to recover the costs associated with design safety reviews, including construction inspections and oversight, in connection with a proposal to construct, expand, or operate a gas pipeline facility or LNG facility with design and construction costs at least \$2.5 billion. DOT must prescribe a fee structure and assessment methodology based on costs to perform the reviews • Requires the project applicant to notify DOT and provide design specifications, construction plans, procedures and related materials at least 120 days prior to commencement of construction. DOT will make best efforts to provide written comments, feedback, and guidance on the project not later than 90 days after receiving materials from applicant • No additional DOT authority to require applicant to obtain permits prior to design and construction • Establishes Pipe Safety Design Review Fund in the Treasury • Requires DOT to issue guidance, not later than 1 yr. after enactment, to clarify “new or novel technologies or design” 	Guidance not later than 1 year after enactment
SEC.19. MAINTENANCE OF EFFORT.	<ul style="list-style-type: none"> • Allows DOT to grant a waiver, for fiscal years 2012 and 2013, to a State for the inability to maintain or increase the required funding of the State’s pipeline safety program at or above the level required for Federal funding if the State can demonstrate economic hardship. DOT may also grant waivers for fiscal year 2014 and beyond with a similar demonstration of economic hardship 	
SEC.21. GAS AND HAZARDOUS LIQUID GATHERING LINES.	<ul style="list-style-type: none"> • Requires DOT to conduct a review of Federal and State regulations for gas and HL gathering lines located onshore and offshore in US • Requires DOT, not later than 2 yrs. after enactment, to submit a report on results of the review to Congress, including recommendations regarding: <ul style="list-style-type: none"> • Sufficiency of existing Federal and State laws and regulations to ensure safety of gas and HL gathering lines • Economic impacts, technical practicality, and challenges of applying existing Federal regulations to non-regulated gathering lines compared to public safety benefits • The need to modify or revoke existing exemptions from Federal regulation, based on risk assessment 	Report to Congress not later than 2 years after enactment

SEC.22. EXCESS FLOW VALVES.	<ul style="list-style-type: none"> Requires DOT to issue a final report on evaluation of the NTSB's recommendation on excess flow valves in applications other than service lines to SFR. After the final report, and not later than 2 yrs. after enactment, requires the DOT, if appropriate, to issue regulations requiring the use of EFVs, or equivalent technology, where economically, technically, and operationally feasible on new or entirely replaced distribution branch services, multi-family facilities, and small commercial facilities 	Report and regulations, if any, not later than 2 years after enactment
SEC.23. MAXIMUM ALLOWABLE OPERATING PRESSURE.	<ul style="list-style-type: none"> Mandates DOT to require owners/operators to conduct, not later than 6 mo. after enactment, a verification of records related to interstate and intrastate gas transmission lines in class 3 and class 4 locations and class 1 and class 2 HCAs to ensure that the records accurately reflect the physical and operational characteristics of the pipelines and confirm the established MAOP of the pipelines. The verification will include elements considered appropriate by DOT Owners/operators of gas transmission lines, in locations specified above, must identify and submit to DOT, not later than 18 mos. after enactment, documentation related to segments for which the records are insufficient to confirm the established MAOP Owners/operators must report exceedances of gas transmission MAOP greater than the allowable buildup of pressure-limiting devices or control devices to DOT and appropriate State authorities within 5 days of occurrence For pipelines with insufficient MAOP records, DOT must: <ul style="list-style-type: none"> Require the owner/operator to reconfirm a MAOP as expeditiously as economically feasible; and Determine what actions are appropriate until a MAOP is confirmed. DOT must take into account potential consequence to public safety and the environment, impacts on pipeline system reliability and deliverability, and other factors , as appropriate Requires DOT to issue regulations, not later than 18 mos. after enactment, for conducting tests to confirm the material strength of previously untested gas transmission lines in HCAs that operate at a pressure > 30 % SMYS. DOT must consider safety testing methodologies, including pressure testing, and other alternative methods, including ILI, determined by DOT to be of equal or greater effectiveness Requires DOT, in consultation with FERC and State regulators, to establish the timeframes for mandated testing (see above) that account for potential consequences to public safety and the environment and that minimize costs and service disruptions 	<p>MAOP records verification not later than 6 months after enactment</p> <p>Report insufficient MAOP records not later than 18 months after enactment Report MAOP exceedances within 5 days of occurrence</p> <p>Regulations not later than 18 months after enactment</p>
SEC.24. LIMITATION ON INCORPORATION OF DOCUMENTS BY REFERENCE.	<ul style="list-style-type: none"> Restricts DOT from issuing guidance or regulations, beginning 1 yr. after enactment, that incorporates by reference any documents or portions of documents unless they are made available to the public, free of charge, on an Internet Web site. 	1 year after enactment
SEC.27. REPORT ON PIPELINE PROJECTS.	<ul style="list-style-type: none"> Requires the Comptroller General of the US to conduct a comprehensive study on the process of obtaining Federal and State permits for projects to construct pipeline facilities. The study must evaluate how long it takes to issue permits, the relationship between States and Federal Government in issuing permits, and recommendations from States for improving the process. The Comptroller must submit a report to Congress regarding the results of the study not later than 1 yr. after enactment 	Report to Congress not later than 1 year after enactment

**Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Requests
Docket No. 13-0192
Proposed General Increase in Natural Gas Delivery Service Rates
Data Request Response Date: 6/7/2013**

AG 15.03

Referring to the response to AG 12.12, Attach, please provide the following additional information:

- a) A more detailed discussion of the summary narrative in column b "How Estimated" indicating each assumption made, analysis performed, bid response and detailed estimation that was developed for each line item in the Attachment.
- b) Detailed input data and calculations supporting each of the "Breakdown" amounts shown by RMC and RT in column a.
- c) A description of the methods employed and input values/documents relied upon to develop the calculations provided in your response to part (b) of this data request.

RESPONSE

Prepared By: Stephen R. Colyer
Title: Senior Director Gas Operations & Services
Phone Number: 217-424-6933

Additional details on the assumptions, analysis, and estimates for the responses to AG 12.12 are included in AG 15.03 Attach 1 in the column labeled "Response to AG 15.03." Please note that for certain activities, detailed documented analysis, bids, and forecasted cost breakdowns were not necessary to budget for the planned activity. For topics where detailed documented analysis, bids and forecasted costs were not available, AIC has provided an explanation of the planned activities with an estimate of activity costs and approximate level of activity to be completed in the test year. As noted in the narrative responses to ENG 3.01, ENG 3.01S and ENG 3.01S2, the forecasted spending for gas distribution, transmission and storage activities included in the test year is intended to support ongoing, incremental activities in 2014 and beyond.

Details requests for parts a, b, and c of the request were consolidated into the response in AG 15.03 Attach 1. Additionally AG 15.03 Attach 2 provides supporting information for distribution leak surveys and has been designated **CONFIDENTIAL and PROPRIETARY**. AG 15.03 Attach 3 supports the damage prevention program.

As Provided in AG 12.12							Response to AG 15.03	
a.					b.	d.	a. thru c.	
Bullet	Topic	2014 Amount	RMC	RT	Breakdown	How Estimated	Variance Explanation	Details on How Estimated
1	Various Gas personnel	\$ 2,900,000	0G5	EC		Current level plus additional work outlined in testimony Ex. 7.0 lines 1176 through 1188	Increase in resources necessary to perform identification, analysis, engineering, and project management related to executing the DIMP and TIMP program requirements. Recent integrity management regulations as well as new federal regulations are forthcoming that are based upon the legislation requirements passed by Congress in December 2011. Please AG 13.3 Attach 1, which summarizes the new requirements passed by Congress in December 2011. It is anticipated that the new regulations will result in significant additional work requirements, and consequently the need for additional engineering resources, to complete activities including transmission pipeline replacements, hydrostatic testing of pipelines, and expansion of TIMP requirements. Increase in resources for additional activities related to pipeline safety quality assurance and training programs. Increase in resources for records and data management related to transmission and distribution maximum allowable operating pressure (MAOP) records, data and records validation, data quality controls, and records development. These include resources to complete additional work to improve data accuracy and integrity management records and conform to new standard of having traceable, verifiable, and complete data and records on transmission pipelines	The costs for staffing are based on the budgeted cost for each individual position, type of position, and rate of pay. Costs for materials and contractors are forecasted based on historical spend levels for the identified activities. Costs for labor are calculated within the AIC budget system for the number of positions identified and forecasted to the RMC they reside in. The costs for this category is an aggregate of staffing, material, and contractor costs for individuals within the Gas Technical Services Engineering and Operations group as well as the Gas Standards group. Staffing level summaries for 0G5, 0G7, and 0G8 are outlined in responses to AG 13.2, 13.4, and 13.5.
				BX	\$ 70,000			
				LM	\$ 730,000			
				EC	\$ 130,000			
				BX	\$ 190,000			
				LM	\$ 1,100,000			
			0G8	LM				
		\$ 626,000						
2	Integrity Management - Gas Leak Repair	\$ 1,300,000	0G5	EC		Projected costs for known and planned leaks repairs	Costs based on DIMP program requirements developed in 2012 for additional and accelerated leaks repairs explained in Exhibit 7.0 lines 267-270.	Leak repair costs are estimated costs for contractor, engineering and field labor to identify, locate, and repair leaks on mains and services as part of the AIC DIMP annual threat analysis results, as well as costs to repair a known issue with leaking gas service caps also included in the budgeted cost. The forecast will enable repair of between 100 and 150 service tee cap leaks at an estimated cost of \$1500 per repair and to repair approximately 250 - 300 main or service leaks at an estimated costs of \$3000 per repair.
						\$ 1,300,000		

Bullet	Topic	2014 Amount	RMC	RT	Breakdown	How Estimated	Variance Explanation	Details on How Estimated
3	Integrity mgt. - data conversion & field Surveys	\$ 1,100,000	OG5	EC		Contractor estimate and internal cost projection for data conflation and clean-up	Additional project work initiated in 2013 which will be ongoing in 2014 and subsequent years for data development and validation necessary to support the integrity management programs	The costs for data conflation and clean-up are estimates for a GIS Services vendor to convert existing GIS data into a corrected land base data set that matches current GPS and geospatial corrected database standards. In addition, field services contractors will be needed to field verify land base corrections. The costs are based on preliminary discussions with GIS Services contractors. A specific bid has not yet been obtained to perform the work necessary to support the integrity management programs.
					\$ 1,100,000			
4	EAM & MWM	\$ 1,500,000	OG5	EX	\$ 900,000	Internal IT project estimate	O&M expense related to a new information technology software project outlined in the F-4 schedule (Ameren Ex. 7.1). Project was initiated in 2012 with program scope and initial software selection. Detailed design development and implementation began in 2013 and will be completed in 2014.	The cost is based on the estimated AIC and contractor man-hours to develop the program and software requirements, develop request for pricing, analyze options, and select the software vendor and solutions to create and implement the EAM and MWM programs. The costs were developed by the project manager based on estimated time to conduct the initial phases of the effort. Detailed cost breakdown was included in Ameren Exhibit 7.1 as supporting information for the F4 Schedule in this proceeding.
				ET	\$ 600,000			
5	HPD Clearing	\$ 1,200,000	676	EC		Based on planned miles of distribution pipeline rights of way to clear	Additional High Pressure Distribution Right of Way clearing for leak survey inspections and DIMP program.	AIC has estimated there are approximately 750 miles of high pressure distribution pipe installed in areas where right of way clearing is required to perform pipeline safety related surveys and inspections. The average cost to clear, maintain, and mark right of ways, based on historical costs for transmission right of way clearing is approximately \$16,000 per mile. AIC would be able to complete the right of way clearing over 10 years or 75 miles per year. 75 miles at a cost of \$16,000 per mile calculates to \$1,200,000
					\$ 1,200,000			
6	Sewer Cross Bores	\$ 550,000	OG5	EC		Estimate of number of Inspections and cost per inspection.	Project work initiated in 2011 and 2012. \$150,000 was budgeted to increase the number of inspections in 2013 and again increase the number of inspections in 2014. Reference Direct Testimony Exhibit 7.0 lines 253-318 and line 1206	The sewer cross bore inspection program is predominantly focused on gas service and main installations performed between approximately 1980 and 2000. Records indicate there are as many as 200,000 gas services installed during this period. Based on historical costs to perform inspections in 2012 with contractors, AIC projects a cost of approximately \$250 per inspection utilizing contractor services. AIC plans to inspect between 2000 and 2500 services in 2014 using contractor services for a total estimated costs of \$550,000. Based on 2014 inspection results, AIC may need to increase the level of inspections in future years to complete all services in a reasonable time frame.
					\$ 550,000			

Bullet	Topic	2014 Amount	RMC	RT	Breakdown	How Estimated	Variance Explanation	Details on How Estimated
7	Damage Prevention (Watch and Protect)	\$ 1,500,000	93R	EC	\$ 650,000	Planned staffing for projected 3rd party excavation volume and work load		The costs for Watch and Protect are based on a staffing level and the related labor costs for 8 full time employees to administer the program and a portion of time for two supervisors. These positions are currently filled and have been in place and filled since 2012. The contractor costs are based on an estimated number of approximately 5000-5500 stand-bys and a cost of approximately \$120 per stand-by to observe excavation activity.
				LM	\$ 850,000			
8	Atmospheric Corrosion painting	\$ 1,000,000	676	OG4	\$ 700,000	Estimate based on number of sites and facilities to paint	Additional corrosion control project work identified during inspection and maintenance activities and includes continuous maintenance of above ground pipe coatings in subsequent years.	Painting costs are based on historic contractor costs for painting natural gas piping and above ground facilities. The costs for painting in RMC 676 are for customer meter sets. The number of meters sets to paint can vary annually based on maintenance inspections performed the previous year indicated painting is required. The average cost to paint a meter set is approximately \$5.50 each. In 2014 AIC expects to paint between 55,000 - 60,000 gas meter sets with the \$300,000 forecast budget. The costs for RMC OG4 are based on the approximately cost of \$5000 to paint small regulator stations and commercial/industrial meter sets and the approximately costs of \$20,000-\$40,000 to paint large regulator station and meter sets. AIC anticipates painting between 50 and 60 small installations and 10-15 large installations in 2014.
				EC	\$ 300,000			
9	JULIE requests	\$ 3,200,000	93R	EC	\$ 3,100,000	Cost varies based on projected number of locate requests and cost per locate.		JULIE locate costs are based on a per locate cost of approximately \$13 and a forecasted level of 240,000 gas locate requests that will have to be physically located. In 2012, AIC performed approximately 230,000 physical locates. The forecast level of requests is based on historical trends and anticipated increases in new business activity that will create additional locate requests. Included in the total cost are two AIC screener positions that identify locate requests that do not have to be physically located. These two positions are filled and have been in place for several years. Please see the bolded references in AG 15.3 Attach 3 which provide supporting information on total locate requests that exceeded 340,000 in 2012.
				LU	\$ 100,000			

Bullet	Topic	2014 Amount	RMC	RT	Breakdown	How Estimated	Variance Explanation	Details on How Estimated
10	Dist. Leak Survey	\$ 600,000	676	EC		Based on miles of pipe in current year to survey	Cost varies based on number of miles of pipe scheduled to be surveyed in a given year and cost of surveys.	Distribution main and service leak survey is performed on a four year cycle and is an ongoing activity required by pipeline safety regulations. The miles of main surveyed each year are based on the miles surveyed in the previous cycle adjusted for new installations and retirements. The amount of main and services surveyed is generally evenly distributed over each year but can vary somewhat each year. The survey costs are based on work scope for the 2014 cycle and a quoted contractor cost per service of \$2.28 each and a cost of \$59.79 per mile of distribution main. Please see AG 15.3 Attach 2 for confidential bid information.
					\$ 600,000			