

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

AMEREN ILLINOIS COMPANY)
d/b/a Ameren Illinois)
an Illinois corporation)
) **DOCKET No. 13-_____**
and)
)
MENARD ELECTRIC COOPERATIVE)
an Illinois not-for profit corporation)

STIPULATED MOTION FOR A PAPER HEARING

COME NOW, AMEREN ILLINOIS COMPANY d/b/a Ameren Illinois (“Ameren Illinois”), an Illinois corporation, and MENARD ELECTRIC COOPERATIVE (“MEC”), an Illinois non-profit corporation (hereinafter collectively referred to as the “Parties”) and hereby seek leave to conduct the above-captioned proceedings as a Paper Hearing pursuant to 83 Ill. Admin. Code § 200.525. In support of this request, the Parties state as follows:

1. The Parties have filed a Joint Petition pursuant to Section 6 of the Electric Supplier Act, seeking approval of a Partial Service Area Agreement (“PSAA”), defining and delineating an exchange of nearly identical customer loads in rural Mason and Cass Counties, Illinois.

2. The Rules of Practice of the Illinois Commerce Commission (“Commission”) permit the Parties and Commission Staff (“Staff”) participating in a proceeding to stipulate to the waiver of a hearing and to the resolution of the matter based solely on the written pleadings and affidavits in a process described as a Paper Hearing. 83 Ill. Admin. Code §200.525(a). Such a stipulation may be filed at any time prior to the date the Administrative Law Judge marks the case Heard and Taken. 83 Ill. Admin. Code §200.525(d). The stipulation is subject to the

approval of all parties, Staff and the Administrative Law Judge. 83 Ill. Admin. Code § 200.525(b).

3. The Parties agree that a Paper Hearing would be an efficient means of resolving the Joint Petition, as it appears there are no areas of controversy.

4. Attached hereto and marked for identification purposes as Motion Exhibit A is the Stipulation to be signed by the Staff member in the event one is assigned to this Docket prior to the preparation of an Order for the Commission's consideration. In the event no Staff member is assigned to this matter, both signatories to this Stipulation expressly waive the necessity of having Staff review the Joint Petition and/or file a Staff Stipulation.

5. Affidavits supporting the Stipulation and Exhibits are attached hereto and marked collectively for identification purposes as Motion Exhibit B.

6. The Parties have prepared and circulated a Draft Order, attached hereto as Motion Exhibit C.

WHEREFORE, Ameren Illinois Company d/b/a Ameren Illinois and Menard Electric Cooperative request that this proceeding be conducted as a Paper Hearing and that an Order substantially similar to the Draft Order attached as Motion Exhibit C be entered.

DATED: July 19, 2013

**MENARD ELECTRIC
COOPERATIVE**

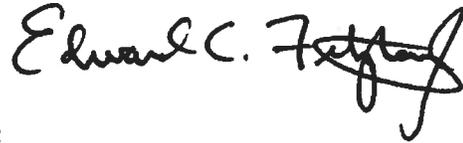
By: _____



Lynn Frasco
Manager
MENARD ELECTRIC COOPERATIVE
14300 State Hwy 97
Petersburg, Illinois 62675
(217) 632-7746, *direct*
(217) 632-2578, *facsimile*
lfrasco@menard.com

**AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois**

By: _____



Edward C. Fitzhenry
Counsel for Ameren Illinois Company
AMEREN SERVICES COMPANY
1901 Chouteau Avenue
PO Box 66149, M/C 1310
St. Louis, Missouri 63166-6149
(314) 554-3353, *direct*
(314) 554-4014, *facsimile*
efitzhenry@ameren.com

STIPULATION

The Staff of the Illinois Commerce Commission hereby stipulates to the attached Motion for a Paper Hearing pursuant to 83 Ill. Admin. Code §200.525.

Staff recommends that an Order substantially in the form of Motion Exhibit C is entered in this proceeding.

Assigned Staff Member:

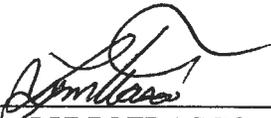
Division
of the Illinois Commerce Commission

Dated this _____ day of _____, 2013.

VERIFICATION

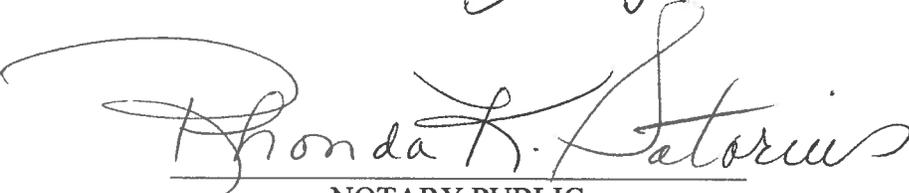
STATE OF ILLINOIS)
) SS.
COUNTY OF MENARD)

I, Lynn Frasco, as Manager of Menard Electric Cooperative, have read the foregoing *Stipulated Motion for Paper Hearing* filed in the above cause and know the content thereof and the same is true and correct to the best of my knowledge, information and belief.



LYNN FRASCO

SUBSCRIBED and SWORN to before me this 5th day of July, 2013.



NOTARY PUBLIC

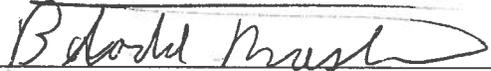
My Commission Expires:



VERIFICATION

STATE OF ILLINOIS)
) SS.
COUNTY OF SANGAMON)

I, B. TODD MASTEN, as Wholesale Delivery and Service Area Consultant for Ameren Illinois Company d/b/a Ameren Illinois, have read the foregoing *Stipulated Motion for Paper Hearing* filed in the above cause, and know the content thereof and the same is true and correct to the best of my knowledge, information and belief.



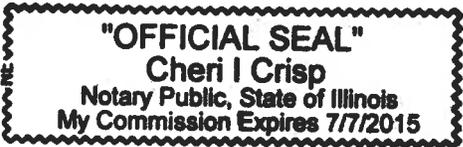
B. TODD MASTEN

SUBSCRIBED and SWORN to before me this 9th day of July, 2013.



NOTARY PUBLIC

My Commission Expires:



STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY)
d/b/a Ameren Illinois)
an Illinois corporation)
) DOCKET No. 13- _____
and)
)
MENARD ELECTRIC COOPERATIVE)
an Illinois not-for profit corporation)

DRAFT ORDER

By the Commission:

Procedural History, Background and Relief Sought

On July 19, 2013, AMEREN ILLINOIS COMPANY d/b/a Ameren Illinois (“AIC”), an Illinois corporation, and MENARD ELECTRIC COOPERATIVE (“MEC”), an Illinois non-profit corporation (hereinafter collectively referred to as “Petitioners”), filed a Joint Petition with the Illinois Commerce Commission (“Commission”), pursuant to Section 6 of the Electric Supplier Act (“ESA”), 220 ILCS 30/1 et seq., seeking approval of a Partial Service Area Agreement (“PSAA”), dated May 10, 2013.

AIC and MEC are both electric suppliers as defined in Section 3.5 of the Electric Supplier Act, 220 ILCS 30/3.5. On May 10, 2013, Petitioners entered into two letter agreements constituting a PSAA, which define and delineate exchanges of nearly identical customer loads in rural Mason and Cass Counties. Requests for Commercial Customer Releases were received from Ms. Lisa Essig, owner of Lila Essig Farms (“Release 1”), and Mr. Norman Korsmeyer, owner of Norman Korsmeyer Farms (“Release 2”), respectively

Regarding Release 1, MEC is to provide 200 amp 277/480 volt three-phase electric service exclusively to an irrigation system on a parcel of land farmed and owned by Ms. Essig.

Motion Exhibit C

The 40 hp well pump for the irrigation system is located approximately 1,500 feet north of County Road 1200N Road, more fully described as: SW Quarter of Section 27, Township 21 North, Range 9 West, Mason County, Illinois.

Regarding Release 2, AIC is to provide 200 amp, 277/480 volt three-phase electric service exclusively to an irrigation system on a parcel of land farmed and owned by Mr. Korsmeyer. The 40 hp well pump for the irrigation system is located approximately 1,350 feet south of Mound Lake Road, more fully described as: NW Quarter of Section 3, Township 18 North, Range 11 West, Cass County, Illinois.

In the instant proceeding, Petitioners seek the Commission's consent and approval of the Release 1 and 2 pursuant to Section 6 of the ESA. Approving the Petitioners' request furthers the goals of the parties' PSAA, increases the efficiency of Petitioners in rendering service to the public, avoids duplication of facilities, and accordingly serves the public interest.

Commission Conclusions, Findings and Ordering Paragraphs

Having reviewed the Joint Petition and Exhibits, the Commission finds its consent and approval of the Partial Service Area Agreement to be in the public interest, and should be granted.

The Commission, having considered the record herein, is of the opinion and finds that:

1. Ameren Illinois Company d/b/a Ameren Illinois and Menard Electric Cooperative are electric suppliers within the meaning of the Electric Supplier Act;
2. The Commission has jurisdiction over the Petitioners and the subject matter in this proceeding;
3. The facts recited and conclusions reached in the prefatory portion of this Order hereinabove are hereby adopted as findings herein;

Motion Exhibit C

4. Partial Service Area Agreement pursuant to Section 6 of the Electric Supplier Act between Petitioners appears reasonable and in the public interest and should be approved.

IT IS THEREFORE ORDERED that Petitioners are hereby authorized to enter into and carry out the terms of the Partial Service Area Agreement pursuant to Section 6 of the Electric Supplier Act as attached to the Joint Petition in this proceeding.

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

By Order of the Commission on this ____ day of _____, 2013.

DOUGLAS P. SCOTT, Chairman