

REBUTTAL TESTIMONY

of

BONITA A. PEARCE

Accounting Department  
Financial Analysis Division  
Illinois Commerce Commission

Proposed General Increase in Gas Rates

Ameren Illinois Company d/b/a Ameren Illinois

Docket No. 13-0192

August 7, 2013

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## SCHEDULES

SCHEDULE 13.01 – ADJUSTMENT TO REFLECT RENTAL REVENUE

SCHEDULE 13.02 – ADJUSTMENT TO REDUCE ADVERTISING EXPENSES

SCHEDULE 13.04 – ADJUSTMENT TO REDUCE INDUSTRY DUES EXPENSE

SCHEDULE 13.06 – ADJUSTMENT TO REDUCE AMEREN CREDIT CARD EXPENSE

## ATTACHMENTS

ATTACHMENT A – RESPONSE TO DR AIC-STAFF 13.01 – 13.10

ATTACHMENT B – RESPONSE TO DR AIC-STAFF 12.01 – 12.08

ATTACHMENT C – AIC RESPONSE TO DR BAP 22.01

ATTACHMENT D – RESPONSE TO DR AIC-STAFF 5.04

1 **Witness Identification**

2 **Q. Please state your name and business address.**

3 A. My name is Bonita A. Pearce. My business address is 527 East Capitol  
4 Avenue, Springfield, Illinois 62701.

5

6 **Q. Have you previously filed testimony in this proceeding?**

7 A. Yes. My direct testimony was filed on June 11, 2013 as ICC Staff Exhibit  
8 4.0; my revised direct testimony was filed on June 27, 2013 as ICC Staff  
9 Exhibit 4.0R and my supplemental direct testimony was filed on July 5,  
10 2013 as ICC Staff Exhibit 9.0.

11

12 **Q. What is the purpose of your rebuttal testimony?**

13 A. The purpose of my rebuttal testimony is to respond to the rebuttal  
14 testimony of Mr. Ronald D. Stafford (Ameren Ex. 17.0 (Rev.)), the rebuttal  
15 and supplemental rebuttal testimony of Mr. Thomas B. Kennedy, III  
16 (Ameren Exs. 21.0 (Rev.) and 29.0) and the supplemental rebuttal  
17 testimony of Ms. Jacqueline K. Voiles (Ameren Ex. 28.0) of Ameren Illinois  
18 Company (“Ameren,” “AIC” or “Company”) regarding my adjustments to:

- 19 1. Recognize that the Enterprise Asset Management System  
20 (“EAMS”) and the Mobile Work Management System (“MWMS”) will  
21 not solely benefit Illinois ratepayers;  
22 2. Disallow certain advertising expenses;  
23 3. Disallow certain industry dues; and

24 4. Disallow certain costs charged on the Ameren credit card of various  
25 Ameren employees.

26

27 **Schedule and Attachment Identification**

28 **Q. Are you sponsoring any schedules or attachments as part of ICC**  
29 **Staff Exhibit 13.0?**

30 A. Yes. I prepared the following schedules that reflect data as of, or for the  
31 test year ending, December 31, 2014:

32 Schedule 13.01 - Adjustment to Reflect Rental Income

33 Schedule 13.02 - Adjustment to Reduce Advertising Expenses

34 Schedule 13.04 – Adjustment to Reduce Industry Dues Expense

35 Schedule 13.06 - Adjustment to Reduce Ameren Credit Card Expense

36 I also prepared the following attachments:

37 Attachment A – Response to DR AIC-Staff 13.01-13.10 and Attachment

38 Attachment B – Response to DR AIC-Staff 12.01-12.08 and Attachment

39 Attachment C – AIC Response to DR BAP 22.01

40 Attachment D – Response to DR AIC-Staff 5.04

41

42 **Q. Please explain the RZ suffixes that appear in your schedule and**  
43 **attachment numbers and references.**

44 A. These suffixes indicate the rate zone to which a particular schedule  
45 applies. RZ-1 indicates Rate Zone I, formerly AmerenCIPS; RZ-2  
46 indicates Rate Zone II, formerly AmerenCILCO; and RZ-3 indicates Rate

47 Zone III, formerly AmerenIP. For example, Schedule 13.02 RZ-1 presents  
48 my Adjustment to Reduce Advertising Expenses for Rate Zone I, which  
49 was formerly AmerenCIPS.

50

51 **Uncontested Adjustments and Recommendations**

52 **Q. Were there any adjustments proposed by you in your direct or**  
53 **supplemental direct testimony that the Company accepted in rebuttal**  
54 **testimony?**

55 A. Yes, Mr. Ronald Stafford incorporated my adjustment to remove lobbying  
56 expense (Staff Ex. 4.0R, Sched. 4.05) in AIC's rebuttal revenue  
57 requirement (Ameren Ex. 17.4, Sched. 5), so my adjustment for lobbying  
58 presented on Schedule 4.05 of ICC Staff Exhibit 4.0R is no longer  
59 necessary.

60

61 **Q. Were there any reporting recommendations proposed by you in your**  
62 **direct or supplemental direct testimony that the Company accepted**  
63 **in rebuttal testimony?**

64 A. Yes, Mr. Craig Nelson accepted my reporting recommendations that:  
65 a) The Commission order the Company to assess the impact of the  
66 divestiture of the merchant generating assets in the next gas rate  
67 proceeding and for the Company to provide evidence in that proceeding  
68 that an effort was made to mitigate the costs of the transaction and

69 corresponding impact on AIC and its affiliates; and, b) The Commission  
70 order AIC to:

71 (1) provide an electronic copy of its FERC Form 60 to the Manager  
72 of Accounting of the Commission on the day the FERC Form 60 is  
73 filed with FERC;

74 (2) notify the Manager of Accounting of the Commission within 30  
75 days of implementation of substantial changes to service company  
76 allocation factors; and,

77 (3) provide electronic copies of all FERC orders resulting from a  
78 FERC audit of costs or procedures that are subject to allocation or  
79 direct assignment to AIC and any responses to FERC by AIC to the  
80 Manager of Accounting of the Commission. (Ameren Ex. 16.0  
81 (Rev.), 16.)

82

83 **Q. Did you propose any other reporting recommendations in your direct**  
84 **or supplemental direct testimony that the Company did not accept in**  
85 **rebuttal testimony or that are no longer necessary?**

86 A. No, I did not propose any other reporting recommendations.

87

88 **Withdrawn Adjustments**

89 **Q. Are you withdrawing any adjustments proposed in your direct or**  
90 **supplemental direct testimony?**

91 A. Yes, since AIC accepted a portion of my adjustment as indicated by Mr.  
92 Ronald Stafford (AIC Ex. 17.0 (Rev.), 5:91 – 93; Ameren Ex. 17.4, Sched.  
93 3), I am withdrawing the balance of my adjustment to office supplies  
94 expense presented in Staff Ex. 4.0R, Sched. 4.03.

95

96 **Contested Adjustments**

97 **Adjustment to Reflect Rental Revenues**

98 **Q. Please describe Schedules 13.01, Adjustment to Reflect Rental**  
99 **Revenues.**

100 A. Schedules 13.01 present my adjustment to reflect the rental revenues for  
101 use of the EAMS and the MWMS. I have revised my adjustment presented  
102 in direct testimony to recognize that the level of costs for EAMS and  
103 MWMS included in the 2014 test year were less than the 2015 projected  
104 costs that would support the level of 2015 revenue from Ameren Missouri  
105 for the use of the systems. My adjustment recognizes that EAMS and  
106 MWMS will not solely benefit Illinois jurisdictional ratepayers.

107

108 **Q. How did AIC respond to your adjustment presented in direct**  
109 **testimony?**

110 A. According to AIC witness Mr. Ronald D. Stafford's Revised Rebuttal  
111 Testimony (Ameren Ex. 17.0 (Rev.), 25:531-534), the Company does not  
112 agree with my adjustment or a similar adjustment proposed by AG/CUB  
113 witness Mr. Michael L. Brosch (AG/CUB Ex. 1.3, 3).

114

115 Mr. Stafford contended that additional costs for EAMS and MWMS will be  
116 incurred during 2015 and that it was inappropriate to include the full  
117 amount of projected 2015 revenues in the test year. (Ameren Ex. 17.0  
118 (Rev.) 25:530-534.)

119

120 **Q. Do you find Mr. Stafford's arguments persuasive?**

121 A. Given the fact that only a portion of the total project costs are reflected in  
122 the 2014 test year, I have revised my adjustment to recognize that not all  
123 of the costs associated with EAMS and MWMS have been included in the  
124 test year. Accordingly, I have modified my adjustment to reflect \$358,000  
125 of 2014 revenue instead of the annual average revenue of \$772,000 that I  
126 proposed in my direct testimony (Staff Ex. 4.0R, Sched. 4.04). This  
127 modification will remove an amount from the revenue requirement  
128 representing costs for EAMS and MWMS that will not provide service to  
129 Illinois jurisdictional ratepayers.

130

131 **Adjustment to Advertising Expense**

132 **Q. Please describe Schedules 13.02 Adjustment to Reduce Advertising**  
133 **Expense.**

134 A. Schedules 13.02 reflect my adjustment to reduce the Company's  
135 forecasted 2014 advertising expense by rate zone using the allocator for  
136 Other Operating & Maintenance ("O & M") (AIC WPC-8 RZ, line 5).

137 I have modified the amount of my rebuttal adjustment to reflect the  
138 acceptance by AIC to remove \$24,000 of sponsorships and that AIC had  
139 not included \$21,000 of tangible benefits associated with the sponsorships  
140 in its requested revenue requirement. (Ameren Ex. 21.0 (Rev.), 20:418-  
141 419.)

142 I have also removed the portion of my adjustment for certain charges on  
143 Ameren credit cards of certain employees from my adjustment for  
144 advertising expense and proposed the disallowance in a separate  
145 adjustment on Schedule 13.06.

146

147 **Q. How did AIC respond to your adjustment to reduce the Company's**  
148 **2014 forecasted advertising expense?**

149 A. AIC witness Mr. Kennedy does not agree with the amounts I disallowed  
150 from 2012 actual expenses based on my understanding of the standards  
151 expressed in the Commission's order in Docket 12-0293 (Ameren Ex.  
152 21.0 (Rev.), 29:609-615 .) He also rejected my methodology of re-  
153 calculating the 2014 advertising expense using either the escalated 2012  
154 actual expense or using an escalated average of actual expenses from  
155 2009-2012. (Ameren Ex. 21.0 (Rev.), 23: 484-490.)

156

157 **Q. How do you respond to Mr. Kennedy's opposition to your adjustment**  
158 **for forecasted advertising expenses based upon your understanding**

159 **of the standards expressed in the Commission’s order in Docket No.**  
160 **12-0293?**

161 A. My adjustment removes three types of expenses from the test year that  
162 were also disallowed in the ICC Order in Docket No. 12-0293:  
163 (i) payments to Strategic International Group (“SIG”);  
164 (ii) certain Ameren credit card charges (reflected as part of my advertising  
165 adjustment in direct testimony (Staff Ex. 4.0R, Sched. 4.02, lines 7, 14),  
166 but reflected as a separate adjustment in my supplemental direct  
167 testimony (Staff Ex. 9.0, Sched. 9.01) and my rebuttal testimony (Staff Ex.  
168 13.0, Sched. 13.06); and  
169 (iii) payments for certain sponsorships.

170

171 **Q. Please explain the basis for your disallowance of payments to SIG.**

172 A. I have disallowed the payments to SIG because AIC has provided no  
173 evidence that ratepayers received any benefit from the services provided  
174 by SIG. Further, AIC indicated in response to Staff DR BAP 22.01 that it  
175 cannot provide any documentation of any substantive consultations or  
176 written work product to demonstrate any benefit that AIC derived from the  
177 contract with SIG, stating: “No written work product was produced and  
178 provided by SIG to AIC in 2012.” (ICC Staff Ex. 13.0, Attachment C.)

179

180 **Q. Please explain the basis for your disallowance of certain Ameren**  
181 **credit card charges.**

182 A. My disallowance of certain Ameren credit card charges is now a separate  
183 adjustment and recognized on Schedule 13.06.

184

185 **Q. Please explain the basis for your disallowance of certain**  
186 **sponsorships.**

187 A. The basis for my disallowance of each of the sponsorships is provided in  
188 ICC Staff Ex. 13.0, Attachment A, which are my responses to DRs AIC-  
189 Staff 13.01-13.10. Individual sponsorships were disallowed either  
190 because they are unnecessary for provision of utility service and/or do not  
191 provide benefits to ratepayers, such as the following examples:

- 192 • Beardstown Chamber of Commerce - dues and donation for Halloween  
193 candy;  
194 • Belleville High School- Hockey Team Thanksgiving 5K Run;  
195 • Big Brothers and Big Sisters- ladies golf tournament team registration;  
196 • City of East Peoria - Festival of Lights Whale Float;  
197 • City of Peoria - sponsorship of State of the City; and  
198 • City of Decatur - sponsorship of Decatur Celebration  
199

200 **Q. How do you respond to Mr. Kennedy's opposition to your adjustment**  
201 **to disallow advertising costs in excess of a reasonable increase,**  
202 **represented as a two percent inflation factor applied to the four-year**  
203 **average of actual advertising expenses (2009-2012)?**

204 A. The advertising budget is subject to the Company's discretion. Moreover,  
205 Mr. Kennedy's response to Staff DR BAP 7.05(d) (Ameren Ex. 21.6, 5-6.)  
206 indicates that budgeted advertising costs are not always spent. For  
207 example, his response to subpart (d) states:

208 The actual 2012 advertising costs were \$703,460. The original  
209 corrected forecast presented in Docket No. 11-0282 was for

210 \$1,048,704 (AIC Ex. 18.1, Docket No. 11-0282). The difference is  
211 \$344,244 comparing the forecast to actual spending. This  
212 difference includes a budgeted quarterly media spend that was not  
213 done because of decreased availability and increased costs of ad  
214 placement due to presidential and related political campaigns  
215 running at that time.

216 Also in his rebuttal testimony, Mr. Kennedy noted that historical data  
217 shows AIC's 2012 gas expenses for Account 909 and 930.1 were lowest  
218 in 2012 of the four-year period 2009-2012. (Ameren Ex. 21.0 (Rev.),  
219 24:496-497.) He further explained that AIC's advertising expenses were  
220 lower in 2012 than in 2009-2011 in part because AIC did not execute a  
221 media program in the fourth quarter, estimated to cost \$250,000. (Ameren  
222 Ex. 21.0 (Rev.), 25:501-504.) He indicated that 'budgeted resources were  
223 not allocated to this planned expense because of a reduction in  
224 advertising inventory and higher per-ad costs. (Ameren Ex. 21.0 (Rev.),  
225 25:504-506.)

226

227 **Q. Did Mr. Kennedy provide any specific details about new or increased**  
228 **advertising programs that the Company will undertake in 2014 to**  
229 **support the increase in this budgeted expense?**

230 A. Yes. Mr. Kennedy listed the following programs to be implemented for  
231 2014 (AIC Ex. 21.0 (Rev.), 27-28):

- 232 • Contractor Communications, \$100,000;
- 233 • First Responder Training, \$75,000;
- 234 • Call Before You Dig, \$335,000 (including \$85,000 for production  
235 and \$250,000 for media placement);
- 236 • Pipeline Awareness Mailer, \$100,000;

- 237           • Pipeline Awareness Communication for Municipal Leaders,  
238           \$73,000;  
239           • Pipeline Awareness Communication for School Leaders, \$50,000;  
240           and  
241           • Gas Pipeline Safety Training for Excavators, \$73,000.  
242

243           The sum of these items is equal to \$806,000, the amount that Mr.  
244           Kennedy claims is the historical average expense for the period 2009-  
245           2012, escalated for inflation. Mr. Kennedy also referred to his direct  
246           testimony, lines 457-475 for the identification of specific advertising  
247           activities that AIC intends to execute in 2014 related to AIC's gas  
248           business. (Ameren Ex. 21.0 (Rev.), 22: 466-468). In that section of Mr.  
249           Kennedy's direct testimony, he explained the types of advertising activities  
250           expected in 2014 to include: publishing a monthly customer newsletter  
251           and additional bill inserts; various pamphlets on budget billing, deferred  
252           payment agreements, easy ways to manage bills, utility services for new  
253           customers, safety topics, and information regarding energy assistance  
254           (Ameren Ex. 6.0, 21: 456-465). He further explained that websites will  
255           continue to be updated and the annual media campaign will be continued.  
256           Finally, he explained that starting in 2012 AIC increased the frequency of  
257           tactical outreach to customers and stakeholders to communicate about  
258           gas safety (Ameren Ex. 6.0, 21:466-470).

259

260   **Q    Do you find this description persuasive?**

261    A.   No. These descriptions do not provide sufficient details or amounts to  
262           support the significant increase in the 2014 advertising budget compared

263 with the Company's historical expenses and activities that form the basis  
264 for Staff's adjustment. It is unclear why the costs of 2014 programs are  
265 necessary in addition to the amounts incurred in prior years. Mr. Kennedy  
266 has not justified the need for AIC to double its historical advertising costs  
267 in 2014 from \$806,000 to \$1.55 million (AIC Ex. 21.0 (Rev.), 27:553-556).

268

269 **Q. Based on this information, how do you respond to Mr. Kennedy's**  
270 **assertion that AIC anticipates it will incur higher gas allocated**  
271 **advertising expenses in 2014 than in any year from 2009-2012?**

272 (Ameren Ex. 21.0 (Rev.), 25: 517-522.)

273 A. I do not find his description of 2014 advertising activities to be supportive  
274 of higher gas advertising expenses than incurred in any year from 2009-  
275 2012. Moreover, in subpart (a) of his response to Staff DR BAP 7.05  
276 (Ameren Ex. 21.6, 4) Mr. Kennedy explains in relevant part:

277 The calculations to derive CPR's 2014 test year forecasted  
278 spending use prior budgeted amounts, which, as indicated, was the  
279 basis for the test year forecasted spending. (emphasis added)

280 AIC does not base its forecast on prior actual amounts, but on prior  
281 budgeted amounts. To the extent that prior budgets exceeded actual  
282 spending, those differences are reflected in the 2014 test year forecast.

283 As I indicated in my response to DR AIC-Staff 5.04 (ICC Staff Ex. 13.0,  
284 Attachment D):

285 Ms. Pearce thinks it is appropriate to adjust a forecasted operating  
286 expense based on the most recent calendar year of actual data  
287 adjusted for inflation when the projection of the operating expense

288 for the future year appears to be unreasonable when compared to  
289 the company's actual history of an expense.

290 Thus, I prepared two separate estimates of 2014 advertising expense: (1)  
291 using escalated 2012 actual expense, and; (2) using escalated four-year  
292 average actual expenses (2009-2012). I based my adjustment on the  
293 higher amount (in this case, the four-year average—calculated on Staff  
294 Ex. 4.0R, Schedule 4.02). Basing my adjustment on the four-year  
295 average addresses the fact that AIC chose not to spend its full media  
296 budget during the fourth quarter of 2012. My adjustment represents the  
297 large variance between AIC's 2014 forecasted advertising expense and  
298 my escalated four-year average advertising expense.

299

300 **Adjustment to Reduce Industry Dues Expenses**

301 **Q. Please describe Schedule 13.04, Adjustment to Reduce Industry**  
302 **Dues Expense.**

303 A. Schedule 13.04 removes the remaining portion of my adjustment to  
304 reduce industry dues that was not accepted by AIC in rebuttal testimony.

305

306 **Q. What was AIC's response to your adjustment?**

307 A. AIC witness Mr. Stafford indicated that Ameren Ex. 17.4, Schedule 4, is an  
308 adjustment to accept in part my adjustment to Industry Dues Expense. My  
309 adjustment was rebutted by AIC witness Kennedy who explained that AIC  
310 opposes the remaining disallowance of an amount equal to \$1,718 for

311 costs related to the St. Louis Area Business Health Coalition (“BHC”).  
312 (Ameren Ex. 21.0 (Rev.), 17:358-359.) Mr. Kennedy indicated that BHC  
313 performs lobbying activities. (Ameren Ex. 21.0 (Rev.), 18:372-376.)  
314 Section 9-224 of the Public Utilities Act (“Act”) (220 ILCS 5/9-224)  
315 expressly prohibits any cost of lobbying activity to be recovered in rates.  
316 Because AIC has not demonstrated that the amount was not used for  
317 lobbying, I maintain my adjustment to remove the cost of dues for BHC  
318 from the 2014 revenue requirement.

319

320 **Adjustment to Reduce Ameren Credit Card Expenses**

321 **Q. Please describe Schedule 13.06 Adjustment to Reduce Ameren**  
322 **Credit Card Expense.**

323 A. Schedule 13.06 Adjustment to Reduce Ameren Credit Card Expense  
324 presents my disallowance of certain Ameren credit card charges by rate  
325 zone using an allocator based on Other O & M (Ameren WPC 8 RZ, line  
326 5). This adjustment for the Ameren credit card expense, presented in my  
327 supplemental direct testimony as ICC Staff Ex. 9.0, Sched. 9.01, was  
328 initially included in my direct testimony adjustment to advertising expense  
329 presented on ICC Staff Ex. 4.0R, Schedule 4.02.<sup>1</sup> However, for this  
330 rebuttal testimony my adjustment of Ameren credit card charges is

---

<sup>1</sup> In my direct testimony (Staff Ex. 4.0R) and in my rebuttal testimony (Staff Ex. 13.0) schedules numbered 4.01 and 13.01, respectively, present my adjustment to reflect rental revenue. However, in my supplemental direct testimony (Staff Ex. 9.0) I deviated from this numbering order and used Schedule 9.01 to reflect my adjustment to Ameren credit card expense.

331 considered as a separate adjustment in order to simplify the presentation  
332 of issues.

333

334 **Q. Did AIC respond to your adjustment to reduce Ameren credit card**  
335 **Expenses (ICC Staff Ex. 9.0, Sched. 9.02) for certain types of charges**  
336 **that are not recoverable from ratepayers?**

337 A. Yes, AIC witness Ms. Voiles opposed my adjustment on the grounds that  
338 the disputed charges are “legitimate utility business expenses, which were  
339 prudently incurred and reasonable in amount”. (Ameren Ex. 28.0, 3.) I  
340 maintain that these are charges of the types disallowed by the  
341 Commission in its order in Docket No. 12-0293, and that the costs  
342 charged on the Ameren credit cards are either excessive, unnecessary for  
343 the provision of utility service, do not provide benefits to ratepayers, and/or  
344 primarily benefit AIC employees as a perquisite.

345

346 **Q. Have you performed an individualized determination for each and**  
347 **every charge that you disallowed?**

348 A. Yes. My response to the AIC-Staff 12 DR series attached to this testimony  
349 as Attachment B includes the individual rationale for each separate  
350 charge.

351

352 **Q. Please provide some examples of charges that you propose be**  
353 **disallowed in this case based on your understanding of the**  
354 **Commission's December 5, 2012 Order in Docket No. 12-0293.**

355 A. Below are some examples of charges that I have disallowed on the basis  
356 they are excessive, unnecessary for the provision of utility service, do not  
357 provide benefits to ratepayers and/or benefit AIC employees as a  
358 perquisite (as detailed on ICC Staff Ex. 13.0, Attachment B):

- 359 • Flowers,
- 360 • New employee pens, coffee mugs and travel cups, coasters,
- 361 kudos and gift packets;
- 362 • Lunches, cakes snacks and decorations for parties, meetings,
- 363 and celebrations;
- 364 • Lunch and drinks for attorneys;
- 365 • DVD player, flat screen televisions, satellite television service,
- 366 hardware and accessories;
- 367 • Clothing, including t-shirts and hooded sweatshirt; and
- 368 • Finance charges for cash advances.
- 369

370 Below are examples of charges that I have disallowed on the basis they  
371 are unnecessary for the provision of utility service, do not provide benefits  
372 to ratepayers and benefit AIC employees as a perquisite (as detailed on  
373 ICC Staff Ex. 13.0, Attachment B):

- 374 • Cellular telephone and Blackberry devices, including
- 375 accessories like holsters and car chargers; and
- 376 • Hotel room charge.
- 377

378 Below are examples of charges that I have disallowed on the basis they  
379 are unnecessary for the provision of utility service and do not provide  
380 benefits to ratepayers (as detailed on ICC Staff Ex. 13.0, Attachment B):

- 381 • Volunteer gift cards; and

- 382                   • Dues for McLean County Chamber of Commerce  
383

384   **Q.    How do you respond to Ms. Voiles' contention that each individual**  
385           **expense must be found unreasonable in amount or not prudently**  
386           **incurred to be disallowed from delivery service rates (Ameren Ex.**  
387           **28.0, 3)?**

388   **A.    Section 9-101 of the Act states the following:**

389                   All rates or other charges made, demanded or received by any  
390                   product or commodity furnished or to be furnished or for any  
391                   service rendered or to be rendered shall be just and reasonable.  
392                   Every unjust or unreasonable charge made, demanded or received  
393                   for such product or commodity or service is hereby prohibited and  
394                   declared unlawful. All rules and regulations made by a public utility  
395                   affecting or pertaining to its charges to the public shall be just and  
396                   reasonable. 220 ILCS 5/9-101

397           While I am not an attorney, based on this section of the Act, as well as the  
398           Commission's Order in Docket No. 12-0293, the items disallowed in Staff  
399           Ex. 13.0, Sched. 13.06 are not just and reasonable expenses that should  
400           be collected from ratepayers in delivery service rates.

401

402   **Conclusion**

403   **Q.    Does this conclude your prepared rebuttal testimony?**

404   **A.    Yes, it does.**

Ameren Illinois Company - Rate Zone 1 (CIPS)  
 Adjustment To Reflect Rental Revenues  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>		(In 000's)		
1	Revenue Adjustment per Staff	\$ 358	\$ 83	Line 5 for col. (c); Line 1 (c) * Line 6 (c) for col. (d)
2	Revenue Adjustment per Company	-	-	Response to ENG 4.02
3	Staff Adjustment to Reflect Rental Revenues in 2014 test year	<u>\$ 358</u>	<u>\$ 83</u>	Line 1 minus line 2

Note 1. Rental income to be received from Ameren Missouri for J01HP and J01HZ projects (Enterprise Asset Management System and Mobile Work Management System):

4	Average annual rental income to be received from Ameren Missouri 2015-2019	\$ 772		Response to ENG 4.01 and BAP 1.05 - Annual Avg Revenue
5	Amortization expense reflected in 2014 test year revenue requirement	\$ 358		Revised Rebuttal Testimony of R. Stafford (AIC Ex. 17.0 (Rev.), p. 25, lines 539-541.

Note 2. Allocation of Rental Revenues Using AIC Ex. 15.4, line 12		Revenue Allocation % By Rate Zone	(In 000's) Allocated Amount By Rate Zone	Source of Column (d) Amounts
6	AmerenCIPS - Rate Zone 1	23.2100%	\$ 83	Line 3 (c) multiplied by line 6 (c)
7	AmerenCILCO - Rate Zone 2	23.6200%	85	Line 3 (c) multiplied by line 7 (c)
8	AmerenIP - Rate Zone 3	53.1700%	190	Line 3 (c) multiplied by line 8 (c)
9	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ 358</u>	Sum of lines 6 through 8

Ameren Illinois Company - Rate Zone 1 (CIPS)  
 Adjustment To Reduce Advertising Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
		(In 000's)		
1	Advertising Expense per Staff calculation	\$ 938	\$ 222	Line 11 col. (c) / 1,000 for col. (c); line 1 col. (c) multiplied by % on line 12, col. (c) for col. (d)
2	Advertising Expense per Company	1,733	410	Advertising per Sch. C-8 minus sponsorships removed on Ameren Ex. 17.4, Sch. 2, line 1 (c)
3	Staff Adjustment to Reduce Advertising Expense	<u>\$ (795)</u>	<u>\$ (188)</u>	Line 1 minus line 2; See Note 2 For Allocation by Rate Zone

**Note 1. 2014 Forecasted Advertising Expense Using Four-Year Average Instead of 2012 Actual**

(In Whole Dollars)

4	Four-Year Average of Advertising Expenses for the Years 2009 through 2012 - Gas Portion	\$ 1,048,000		Staff Exhibit 4.0, Attachment A, line 9, col. (c)
	Less: 2012 Expenses that were disallowed in Docket No. 12-0293:			
5	Strategic International Group (formerly Mercury Public Affairs)	(72,720)		Response to DR BAP 6.02
6	P-Card/Corporate Credit Card Expenses	-		Superseded by Staff Ex. 9.0, Sched. 9.01
7	Sponsorships	(94,095)		Staff Ex. 9.0, Sched. 9.02, p. 2
8	Plus: Tangible Benefits not included by AIC in the 2014 revenue requirement	20,429		Response to DR AIC-Staff 13.02 and Series 13 Attachment (Staff Ex. 13.0, Attachment A, col. (t)).
9	2012 Advertising Expense exclusive of comparable expenses disallowed in Docket No. 12-0293	901,614		Sum of lines 4 through 8
10	2013 Estimate based on Inflation Factor of 2 %	919,646		Line 9 multiplied by 1.02%
11	2014 Estimate based on Inflation Factor of 2%	\$ 938,039		Line 10 multiplied by 1.02%

(In 000's)

**Note 2. Allocation of Advertising Disallowance Using Other O & M Allocation Percentages by Rate Zone**

AIC WPC-8 RZ Allocated Amount  
 Line 5 By Rate Zone

Source of Column (d) Amounts

12	AmerenCIPS - Rate Zone 1	23.6656%	\$ (188)	Line 3, col. (c) multiplied by line 12, col. (c)
13	AmerenCILCO - Rate Zone 2	25.7057%	(204)	Line 3, col. (c) multiplied by line 13, col. (c)
14	AmerenIP - Rate Zone 3	50.6288%	(402)	Line 3, col. (c) multiplied by line 14, col. (c)
15	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ (795)</u>	Sum of lines 12 through 14

Ameren Illinois Company - Rate Zone 1 (CIPS)  
 Adjustment To Reduce Industry Dues Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
			(In 000's)	
1	Industry Association Dues Adjustment proposed by Staff in Direct Testimony	\$ (7)	\$ (2)	Staff Ex. 4.0, Schedule 4.04 RZ - 1, line 3
2	Industry Association Dues Adjustment Accepted by AIC in Rebuttal Testimony	(6)	(2)	AIC Ex. 17.4, Schedule 4, line 1
3	Staff Adjustment to Reduce Industry Association Dues Expense	\$ (1)	\$ (0)	Line 1 minus line 2

**Note 1. Allocation of Staff's adjustment by Rate Zone:**

	Per WPC-8 RZ Allocation %	(In 000's)	Source of Column (d) Amounts
	Based on Other O & M (Line 5)	Allocated Amount By Rate Zone	
4	AmerenCIPS - Rate Zone 1	23.6656%	\$ (0) Line 4, col. (c) multiplied by line 3, col. (c)
5	AmerenCILCO - Rate Zone 2	25.7057%	(0) Line 5, col. (c) multiplied by line 3, col. (c)
6	AmerenIP - Rate Zone 3	50.6288%	(1) Line 6, col. (c) multiplied by line 3, col. (c)
7	Total AIC Gas Adjustment per Staff	100.0000%	\$ (1) Sum of lines 4 through 6

Adjustment To Reduce Ameren Credit Card Expenses (formerly P-Card Expenses) - Rate Zone 1 (CIPS)  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
1	Ameren Credit Card Expenses Disallowed by AIC	\$ -	\$ -	Response to DR BAP 6.02
2	Ameren Credit Card Expenses Disallowed by Staff	12	3	DR BAP 20.01; Sch. 9.01, p. 2, line 113/1,000; See Note 2 for Allocation by Rate Zone
3	Staff Adjustment to Reduce Ameren Credit Card Expenses	<u>\$ (12)</u>	<u>\$ (3)</u>	Line 1 minus line 2

Note 1.

Although the Commission disallowed certain expenses that resulted from the use of Ameren Credit Cards ("formerly P-Cards") in Docket No. 12-0293, the Company did not remove comparable types of expenses from the 2012 reporting year, as indicated in the response to DR BAP 6.02. Accordingly, Staff prepared an analysis of purchases with the Ameren Credit Card based on a sample selected in DR BAP 20.01. The results of Staff's analysis show that consistent with the criteria set forth by the Commission in Docket No 12-0293, certain purchases should not be recovered from ratepayers, as summarized on page 2 of Schedule 9.01

Note 2. Allocation Percentages by Rate Zone		Per WPC-8 RZ Allocation % Based on Other O & M	(In 000's) Allocated Amount By Rate Zone	Source of Column (d) Amounts
4	AmerenCIPS - Rate Zone 1	23.6656%	\$ (3)	Line 4 column ( c ) multiplied by line 3
5	AmerenCILCO - Rate Zone 2	25.7057%	(3)	Line 5 column ( c ) multiplied by line 3
6	AmerenIP - Rate Zone 3	50.6288%	(6)	Line 6 column ( c ) multiplied by line 3
7	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ (12)</u>	Sum of lines 4 through 6

Ameren Illinois Company - Rate Zone 2 (CILCO)  
 Adjustment To Reflect Rental Revenues  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>		(In 000's)		
1	Revenue Adjustment per Staff	\$ 358	\$ 85	Line 5 for col. (c); Line 1 (c) * Line 7 (c) for col. (d)
2	Revenue Adjustment per Company	-	-	Response to ENG 4.02
3	Staff Adjustment to Reflect Rental Revenues in 2014 test year	<u>\$ 358</u>	<u>\$ 85</u>	Line 1 minus line 2

Note 1. Rental income to be received from Ameren Missouri for J01HP and J01HZ projects (Enterprise Asset Management System and Mobile Work Management System):

4	Average annual rental income to be received from Ameren Missouri 2015-2019	\$ 772		Response to ENG 4.01 and BAP 1.05 - Annual Avg Revenue
5	Amortization expense reflected in 2014 test year revenue requirement	\$ 358		Revised Rebuttal Testimony of R. Stafford (AIC Ex. 17.0 (Rev.), p. 25, lines 539-541.

Note 2. Allocation of Rental Revenues Using AIC Ex. 15.4, line 12		Revenue Allocation % By Rate Zone	(In 000's) Allocated Amount By Rate Zone	Source of Column (d) Amounts
6	AmerenCIPS - Rate Zone 1	23.2100%	\$ 83	Line 3 (c) multiplied by line 6 (c)
7	AmerenCILCO - Rate Zone 2	23.6200%	85	Line 3 (c) multiplied by line 7 (c)
8	AmerenIP - Rate Zone 3	53.1700%	190	Line 3 (c) multiplied by line 8 (c)
9	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ 358</u>	Sum of lines 6 through 8

Ameren Illinois Company - Rate Zone 2 (CILCO)  
 Adjustment To Advertising Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 2 (CILCO) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
		(In 000's)		
1	Advertising Expense per Staff calculation	\$ 938	\$ 241	Line 11 col. (c) / 1,000 for col. (c); line 1 col. (c) * % on line 13 col. (c) for col. (d)
2	Advertising Expense per Company	1,733	445	Advertising per Sch. C-8 minus sponsorships removed on AIC Ex. 17.4, Sch. 2, line 1 ( c )
3	Staff Adjustment to Reduce Advertising Expense	<u>\$ (795)</u>	<u>\$ (204)</u>	Line 1 minus line 2; See Note 2 for Allocation by Rate Zone

**Note 1. 2014 Forecasted Advertising Expense Using Four-Year Average Instead of 2012 Actual**

		(In Whole Dollars)	
4	Four-Year Average of Advertising Expenses for the Years 2009 through 2012 - Gas Portion	\$ 1,048,000	Staff Exhibit 4.0, Attachment A, line 9, col. (c)
Less: 2012 Expenses that were disallowed in Docket No. 12-0293:			
5	Strategic International Group (formerly Mercury Public Affairs)	(72,720)	Response to DR BAP 6.02
6	P-Card/Corporate Credit Card Expenses	-	Superseded by Staff Ex. 9.0, Sched. 9.01
7	Sponsorships	(94,095)	Staff Ex. 9.0, Sched. 9.02, p.2
8	Plus: Tangible Benefits not included by AIC in the 2014 revenue requirement	<u>20,429</u>	Response to DR AIC-Staff 13.02 Series Attachment (Staff Ex. 13.0, Attachment A, col. (t)).
9	2012 Advertising Expense exclusive of comparable expenses disallowed in Docket No. 12-0293	<u>901,614</u>	Sum of lines 14 through 17
10	2013 Estimate based on Inflation Factor of 2 %	919,646	Line 18 multiplied by 1.02%
11	2014 Estimate based on Inflation Factor of 2%	\$ 938,039	Line 19 multiplied by 1.02%

**Note 2. Allocation of Advertising Disallowance Using Other O & M Allocation Percentages by Rate Zone:**

		(In 000's)		
		AIC WPC-8 RZ	Allocated Amount	Source of Column (d) Amounts
		Line 5	By Rate Zone	
12	AmerenCIPS - Rate Zone 1	23.6656%	\$ (188)	Line 3, col. (c) multiplied by line 12, col. (c)
13	AmerenCILCO - Rate Zone 2	25.7057%	(204)	Line 3, col. (c) multiplied by line 13, col. (c)
14	AmerenIP - Rate Zone 3	50.6288%	(402)	Line 3, col. (c) multiplied by line 14, col. (c)
15	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ (795)</u>	Sum of lines 12 through 14

Ameren Illinois Company - Rate Zone 2 (CILCO)  
 Adjustment To Reduce Industry Dues Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>		(In 000's)		
1	Industry Association Dues Adjustment proposed by Staff in Direct Testimony	\$ (7)	\$ (2)	Staff Ex. 4.0, Schedule 4.04 RZ - 1, line 3
2	Industry Association Dues Adjustment Accepted by AIC in Rebuttal Testimony	(6)	(2)	AIC Ex. 17.4, Schedule 4, line 1
3	Staff Adjustment to Reduce Industry Association Dues Expense	<u>\$ (1)</u>	<u>\$ (0)</u>	Line 1 minus line 2

**Note 1. Allocation of Staff's adjustment by Rate Zone:**

		Per WPC-8 RZ Allocation %	(In 000's)	
		Based on Other O & M (Line 5)	Allocated Amount	Source of Column (d) Amounts
		By Rate Zone		
4	AmerenCIPS - Rate Zone 1	23.6656%	\$	(0) Line 4, col. (c) multiplied by line 3, col. (c)
5	AmerenCILCO - Rate Zone 2	25.7057%		(0) Line 5, col. (c) multiplied by line 3, col. (c)
6	AmerenIP - Rate Zone 3	50.6288%		(1) Line 6, col. (c) multiplied by line 3, col. (c)
7	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$</u>	<u>(1)</u> Sum of lines 4 through 6

Adjustment To Reduce Ameren Credit Card Expenses (formerly P-Card Expenses) - Rate Zone 2 (CILCO)  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 2 (CILCO) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
1	Ameren Credit Card Expenses Disallowed by AIC	\$ -	\$ -	Response to DR BAP 6.02
2	Ameren Credit Card Expenses Disallowed by Staff	12	3	DR BAP 20.01; Sch. 9.01, p. 2, line 113/1,000; See Note 2 for Allocation by Rate Zone
3	Staff Adjustment to Reduce Ameren Credit Card Expenses	<u>\$ (12)</u>	<u>\$ (3)</u>	Line 1 minus line 2

Note 1.

Although the Commission disallowed certain expenses that resulted from the use of Ameren Credit Cards ("formerly P-Cards") in Docket No. 12-0293, the Company did not remove comparable types of expenses from the 2012 reporting year, as indicated in the response to DR BAP 6.02. Accordingly, Staff prepared an analysis of purchases with the Ameren Credit Card based on a sample selected in DR BAP 20.01. The results of Staff's analysis show that consistent with the criteria set forth by the Commission in Docket No 12-0293, certain purchases should not be recovered from ratepayers, as summarized on page 2 of Schedule 9.01

Note 2. Allocation Percentages by Rate Zone		Per WPC-8 RZ Allocation % Based on Other O & M	(In 000's) Allocated Amount By Rate Zone	Source of Column (d) Amounts
4	AmerenCIPS - Rate Zone 1	23.6656%	\$ (3)	Line 4 column ( c ) multiplied by line 3
5	AmerenCILCO - Rate Zone 2	25.7057%	(3)	Line 5 column ( c ) multiplied by line 3
6	AmerenIP - Rate Zone 3	50.6288%	(6)	Line 6 column ( c ) multiplied by line 3
7	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ (12)</u>	Sum of lines 4 through 6

Ameren Illinois Company - Rate Zone 3 (IP)  
 Adjustment To Reflect Rental Revenues  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>		(In 000's)		
1	Revenue Adjustment per Staff	\$ 358	\$ 190	Line 5 for col. (c); Line 1 (c) * Line 8 (c) for col. (d)
2	Revenue Adjustment per Company	-	-	Response to ENG 4.02
3	Staff Adjustment to Reflect Rental Revenues in 2014 test year	<u>\$ 358</u>	<u>\$ 190</u>	Line 1 minus line 2

Note 1. Rental income to be received from Ameren Missouri for J01HP and J01HZ projects (Enterprise Asset Management System and Mobile Work Management System):

4	Average annual rental income to be received from Ameren Missouri 2015-2019	\$ 772		Response to ENG 4.01 and BAP 1.05 - Annual Avg Revenue
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8	AmerenIP - Rate Zone 3	53.1700%	190	Line 3 (c) multiplied by line 8 (c)
9	Total AIC Gas Adjustment per Staff	<u>100.0000%</u>	<u>\$ 358</u>	Sum of lines 6 through 8

Ameren Illinois Company - Rate Zone 3 (IP)  
 Adjustment To Advertising Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 3 (IP) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
		(In 000's)		
1	Advertising Expense per Staff calculation	\$ 938	\$ 475	Line 11 col. (c) / 1,000 for col. (c); line 1 col. (c) * line 14 col. (c) for col. (d)
2	Advertising Expense per Company	1,733	877	Advertising per Sch. C-8 minus sponsorships removed on AIC Ex. 17.4, Sch. 2, line 1 ( c ).
3	Staff Adjustment to Reduce Advertising Expense	\$ (795)	\$ (402)	Line 1 minus line 2; see Note 2 for Allocation by Rate Zone

**Note 1. 2014 Forecasted Advertising Expense Using Four-Year Average Instead of 2012 Actual**

		(In Whole Dollars)	
4	Four-Year Average of Advertising Expenses for the Years 2009 through 2012 - Gas Portion	\$ 1,048,000	Staff Exhibit 4.0, Attachment A, line 9, col. (c)
Less: 2012 Expenses that were disallowed in Docket No. 12-0293:			
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6	P-Card/Corporate Credit Card Expenses	-	Superseded by Staff Ex. 9.0, Sched. 9.01
7	Sponsorships	(94,095)	Staff Ex. 9.0, Sched. 9.02, p. 2
8	Plus: Tangible Benefits not included by AIC in the 2014 revenue requirement	20,429	Response to DR AIC-Staff 13.02 and Series 13 Attachment (Staff Ex. 13.0, Attachment A, col. (t)).
9	2012 Advertising Expense exclusive of comparable expenses disallowed in Docket No. 12-0293	901,614	Sum of lines 4 through 8
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**Note 2. Allocation of Advertising Disallowance using Other O & M Allocation Percentages by Rate Zone:**

		(In 000's)		
		AIC WPC-8 RZ Line 5	Allocated Amount By Rate Zone	Source of Column (d) Amounts
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14	AmerenIP - Rate Zone 3	50.6288%	(402)	Line 3, col. (c) multiplied by line 14, col. (c)
15	Total AIC Gas Adjustment per Staff	100.0000%	\$ (795)	Sum of lines 21 through 23

Ameren Illinois Company - Rate Zone 3 (IP)  
 Adjustment To Reduce Industry Dues Expense  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Amount	RZ - 1 (CIPS) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
			(In 000's)	
1	Industry Association Dues Adjustment proposed by Staff in Direct Testimony	\$ (7)	\$ (4)	Staff Ex. 4.0, Schedule 4.04 RZ - 1, line 3
2	Industry Association Dues Adjustment Accepted by AIC in Rebuttal Testimony	(6)	(3)	AIC Ex. 17.4, Schedule 4, line 1
3	Staff Adjustment to Reduce Industry Association Dues Expense	<u>\$ (1)</u>	<u>\$ (1)</u>	Line 1 minus line 2

**Note 1. Allocation of Staff's adjustment by Rate Zone:**

	Per WPC-8 RZ Allocation %	(In 000's)	Source of Column (d) Amounts
	Based on Other O & M (Line 5)	Allocated Amount By Rate Zone	
4	AmerenCIPS - Rate Zone 1	23.6656% \$	(0) Line 4, col. (c) multiplied by line 3, col. (c)
5	AmerenCILCO - Rate Zone 2	25.7057%	(0) Line 5, col. (c) multiplied by line 3, col. (c)
6	AmerenIP - Rate Zone 3	50.6288%	(1) Line 6, col. (c) multiplied by line 3, col. (c)
7	Total AIC Gas Adjustment per Staff	<u>100.0000% \$</u>	<u>(1) Sum of lines 4 through 6</u>

Adjustment To Reduce Ameren Credit Card Expenses (formerly P-Card Expenses) - Rate Zone 3 (IP)  
 For the Test Year Ending December 31, 2014  
 (In Thousands)

Line No.	Description	Total AIC Gas Adjustment	RZ - 3 (IP) Amount	Source
(a)	(b)	(c)	(d)	(e)
<b>Operating Statement Adjustment:</b>				
1	Ameren Credit Card Expenses Disallowed by AIC	\$ -	\$ -	Response to DR BAP 6.02
2	Ameren Credit Card Expenses Disallowed by Staff	12	6	DR BAP 20.01; Sch. 9.01, p. 2, line 113/1,000; See Note 2 for Allocation by Rate Zone
3	Staff Adjustment to Reduce Ameren Credit Card Expenses	<u>\$ (12)</u>	<u>\$ (6)</u>	Line 1 minus line 2

Note 1.

Although the Commission disallowed certain expenses that resulted from the use of Ameren Credit Cards ("formerly P-Cards") in Docket No. 12-0293, the Company did not remove comparable types of expenses from the 2012 reporting year, as indicated in the response to DR BAP 6.02. Accordingly, Staff prepared an analysis of purchases with the Ameren Credit Card based on a sample selected in DR BAP 20.01. The results of Staff's analysis show that consistent with the criteria set forth by the Commission in Docket No 12-0293, certain purchases should not be recovered from ratepayers, as summarized on page 2 of Schedule 9.01

Note 2. Allocation Percentages by Rate Zone	Per WPC-8 RZ Allocation % Based on Other O & M	(In 000's) Allocated Amount By Rate Zone	Source of Column (d) Amounts
4	AmerenCIPS - Rate Zone 1	23.6656% \$ (3)	Line 4 column ( c ) multiplied by line 3
5	AmerenCILCO - Rate Zone 2	25.7057% \$ (3)	Line 5 column ( c ) multiplied by line 3
6	AmerenIP - Rate Zone 3	50.6288% \$ (6)	Line 6 column ( c ) multiplied by line 3
7	Total AIC Gas Adjustment per Staff	<u>100.0000% \$ (12)</u>	Sum of lines 4 through 6

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 30, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

**AIC-Staff 13.01**

Ms. Pearce's testimony (lines 103-104) notes that Staff's adjustments for Sponsorships is "an updated amount using information provided by the Company in Docket No. 13-0301, Ameren Exhibit 6.2 (Rev.)." Please identify each specific piece of information in Exhibit 6.2(Rev.) that caused Ms. Pearce to increase her disallowance in supplemental direct from her disallowance in direct. In responding, please explain how the information included in Ameren Exhibit 6.2 (Rev.) differs from the information provided to Ms. Pearce in this docket in response to BAP 6.02.

**Response**

Unless specifically identified, the documentation discussed in this response refers to Docket No. 13-0192.

According to the direct testimony of AIC witness Mr. Kennedy, sponsorships are recorded in account 930.1. Mr. Kennedy referred to Schedule C-8 in support of these expenses:

The Schedule C-8 indicates that AIC forecasts that it will charge approximately \$207,000 to Account 930.1 in 2014. This again reflects the portion of Account 930.1 expense that would be allocated to AIC's gas operations. Of that total amount, approximately \$133,000 has been budgeted for corporate sponsorships. (AIC Ex. 6.0, 13:273 – 280)

The direct testimony of AIC witness Mr. Kennedy, AIC Exhibit 6.0, 2:39-40, indicates that Mr. Kennedy sponsored no exhibits with his direct testimony in support of the detail that comprises Account 909, Advertising and Account 930.1, Sponsorships.

The Attorney General issued DR AG 3.10 (response date of April 4, 2013) which notes that on Ameren Exhibit 6.0, 13:279, Mr. Kennedy stated that "approximately \$133,000 has been budgeted for corporate sponsorships". AG DR 13.10 requested "an itemized breakdown of the Company's actual corporate sponsorships by event and payee in

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 30, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

2011 and 2012, indicating the approximate amounts allocable to AIC's gas business in each year, and explain whether/how such amounts are consistent with or supportive of the proposed test-year amounts cited in testimony". AIC responded that information concerning AIC's sponsorships in 2011 can be found in ICC Docket No 12-0293 and further indicated:

Ameren Illinois is presently reviewing the sponsorship costs incurred in 2012 in connection with its upcoming filing to update the cost inputs for its electric formula rate. Upon completion of its review and that filing, AIC will supplement this request with 2012 data.

However, Ms. Pearce is unable to find that the Company ever provided a supplemental response to AG 3.10.

Ms. Pearce issued Staff DR BAP 6.02 (response date of May 8, 2013) seeking 2012 actual expenses in account 909 and 930.1, including amounts allocated to gas service "comparable to the types disallowed by the ICC's Final Order in Docket No. 12-0293 at pages 62-77". AIC's Response to BAP 6.02, p. 2 of 2, final paragraph states:

The disallowed costs for 2012 sponsorships are \$61,000; \$24,400 of that total was charged to gas and \$36,600 to electric.

This information, specifically the \$24,400 provided by the Company in response to BAP 6.02, p. 2 of 2, was relied upon by Ms. Pearce in her direct testimony, ICC Staff Exhibit 4.0, Schedule 4.02, lines 9 and 15, as noted in column (e).

AIC's Response to BAP 6.02, Attach 1 provided no information regarding the detail of sponsorships; it addressed account 909, Advertising.

AIC's Response to BAP 6.02, Attach 2 did provide detail of 2012 Sponsorships and Community Outreach, of which the Gas portion totaled \$8,710, according to the last page. There was a line description called "Total Tangible Benefits"; however, it reflected a zero balance. Because this information did not agree to the total sponsorships expense that was reflected on Schedule C-8, \$207,000 or the amount

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 30, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

referenced in the direct testimony of Mr. Kennedy, \$133,000, Staff relied upon AIC's response to BAP 6.02, as described above.

In the course of reviewing 2012 corporate sponsorships for the electric formula rate proceeding, Docket No. 13-0301, Staff witness Knepler performed an analysis that utilized Ameren Exhibit 6.2 of Mr. Kennedy's testimony in Docket No. 13-0301. This exhibit did provide detail of the sponsorships and the Company's self-disallowance for tangible benefits received. The amount allocable to gas was different than the amount indicated by the Company in its response to BAP 6.02 in Docket No. 13-0192; therefore, Ms. Pearce utilized the more detailed actual 2012 sponsorship expenses provided in Docket No. 13-0301, Ameren Exhibit 6.2(Rev.) for Ms. Pearce's supplemental direct testimony, ICC Staff Exhibit 9.0, Schedule 9.02, lines 8 and 15.

In summary, the information provided in Ameren Exhibit 6.2(Rev.) in Docket No. 13-0301 provided more detail to be evaluated than Ameren's filing or responses to Staff or AG DRs in Docket No. 13-0192. Further, Ameren has not provided documentation or sufficient detail in Docket No. 13-0192 to explain the discrepancy between the amounts used in each docket.

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 30, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

**AIC-Staff 13.02**

Please explain how Ms. Pearce took into consideration AIC's calculation of the value of tangible benefits received by AIC employees associated with sponsorships, when making her disallowance. If Ms. Pearce did not take AIC's calculation of the value of tangible benefits into consideration when making her disallowance, please explain why not.

**Response**

In addition to the value of tangible benefits provided to AIC employees, Ms. Pearce considered (i) whether the sponsorship provides benefit to AIC ratepayers, and (2) whether the charges are necessary for the provision of utility service. In ICC Staff Exhibit 9.0, Schedule 9.02, Ms. Pearce removed additional costs for sponsorships that either do not provide ratepayer benefit or are not necessary for the provision of utility service. Ms. Pearce has provided AIC-Staff 13 Series Attachment to identify the basis for each amount included in ICC Staff Exhibit 9.0, Schedule 9.02. Additionally, Ms. Pearce did not include in her disallowance the value of tangible benefits that the Company did not request in the revenue requirement as shown in column (t) of AIC-Staff 13 Series Attachment. Ms. Pearce will reflect the impact of this amount in her rebuttal testimony.

Response to AIC's  
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**AIC-Staff 13.03**

Please provide an updated version of ICC Staff Exhibit 9.02, page 2 of 2, to include the specific rationale(s) for each sponsorship expense that explains why Ms. Pearce believes each separate and distinct amount is not recoverable in rates.

**Response**

Please see Response to AIC-Staff 13 Series Attachment.

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
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**AIC-Staff 13.04**

For each sponsorship listed on Schedule 9.02, where Staff's disallowance exceeds the value of tangible benefits calculated by AIC, please explain why Staff believes each additional amount should be disallowed. Please note that this request is intended to elicit separate and distinct explanations from Staff for each individual sponsorship cost disallowed.

**Response**

In addition to the value of tangible benefits provided to AIC employees, Ms. Pearce considered (i) whether the sponsorship provides benefit to AIC ratepayers, and (2) whether the charges are necessary for the provision of utility service. In ICC Staff Exhibit 9.0, Schedule 9.02, Ms. Pearce removed additional costs for sponsorships that either do not provide ratepayer benefit or are not necessary for the provision of utility service. Ms. Pearce has provided AIC-Staff 13 Series Attachment to identify the basis for each amount included in ICC Staff Exhibit 9.0, Schedule 9.02. Additionally, Ms. Pearce did not include in her disallowance the value of tangible benefits that the Company did not request in the revenue requirement as shown in column (t) of AIC-Staff 13 Series Attachment. Ms. Pearce will reflect the impact of this amount in her rebuttal testimony.

Response to AIC's  
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AIC-Staff 13.01 – 13.10  
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**AIC-Staff 13.05**

Is it Ms. Pearce's position that AIC has not properly calculated the value of tangible benefits? If Ms. Pearce's answer is yes, please provide Staff's alternative calculation of the value of tangible benefits.

**Response**

No. However, Ms. Pearce also considered (i) whether the sponsorship provides benefit to AIC ratepayers, and (2) whether the charges are necessary for the provision of utility service. In ICC Staff Exhibit 9.0, Schedule 9.02, Ms. Pearce removed additional costs for sponsorships that either do not provide ratepayer benefit or are not necessary for the provision of utility service. Accordingly, Ms. Pearce replaced the amount for sponsorships provided by the Company in response to DR BAP 6.02 in her direct testimony, ICC Staff Exhibit 4.0, Schedule 4.02, line 15, with an updated amount using detailed information attached to Mr. Kennedy's testimony (AIC Ex. 6.2(Rev.)) in Docket No. 13-0301 for 2012. See AIC-Staff 13 Series Attachment to identify the basis for each amount included in ICC Staff Exhibit 9.0, Schedule 9.02. Additionally, Ms. Pearce did not include in her disallowance the value of tangible benefits that the Company did not request in the revenue requirement as shown in column (t) of AIC-Staff 13 Series Attachment. Ms. Pearce will reflect the impact of this amount in her rebuttal testimony.

Response to AIC's  
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AIC-Staff 13.01 – 13.10  
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**AIC-Staff 13.06**

Has Ms. Pearce previously submitted testimony in support of adjustments to a utility's sponsorship expense? If the answer is yes, please identify, by ICC docket number, each Illinois rate proceeding, in the past 15 years, in which Ms. Pearce has submitted testimony on a utility's sponsorship expense.

**Response**

Ms. Pearce has not been employed by the Commission for 15 years; therefore, she is unable to identify testimony on this subject prior to becoming a staff witness. Subject to that limitation, Ms. Pearce is aware she has previously submitted testimony in support of adjustments to a utility's advertising and/or dues expenses, either of which may include sponsorship expense in the following dockets:

Docket No. 01-0432, Illinois Power Company, General Increase in Electric Delivery Service Rates

Docket No. 04-0476, Illinois Power Company, General Increase in Gas Delivery Rates

To the extent Ms. Pearce has previously submitted testimony in support of adjustments to a utility's sponsorship expense in additional dockets not listed herein, that information is readily available to the Company through the Commission's e-Docket system.

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
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**AIC-Staff 13.07**

In making her "updated" adjustment to Sponsorships, did Ms. Pearce take into account AIC's supplemental response to MHE 6.09? If not, why not.

**Response**

Ms. Pearce did not take into account AIC's supplemental response to MHE 6.09 in calculating the amount of Sponsorships that is reflected on Ms. Pearce's Supplemental Direct Testimony Schedule 9.02 because the Company's response relates to procedural guidelines developed and followed by the Company in regard to its accounting for corporate sponsorships and does not address the cost of Sponsorships.

The amount that Ms. Pearce reflected on ICC Staff Exhibit 9.0, Schedule 9.02, lines 8 and 15, was derived from page 2 of that schedule, as noted in column (e).

Response to AIC's  
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**AIC-Staff 13.08**

These questions concern the Commission's recent findings on sponsorship expense in ICC Docket Nos. 12-0511/0512 (pages 164 and 169)

- a) Did Ms. Pearce consider the Commission's decision in ICC Docket Nos. 12-0511/0512 (pages 164 and 169) when judging whether a cost in Schedule 9.02 should be disallowed?

**Response**

No.

- b) If the answer is no, please explain why Ms. Pearce, in her lay opinion does not consider the Commission's decision in ICC Docket Nos. 12-0511/0512 (pages 164 and 169) to be applicable guidance to consider when disallowing sponsorship and community outreach events in this proceeding.

**Response**

Staff objects to this request because it implies that a legal conclusion has been reached regarding whether the Docket Nos. 12-0511/0512 decision is in any manner analogous to this docket, providing relevant guidance to the disallowance of a cost in this proceeding.

- c) Does Ms. Pearce agree with the Commission's conclusion in ICC Docket Nos. 12-0511/0512 (pages 164) that "the nature of the expense is more important" than the recording of the expense, when judging whether the cost should be recoverable in rates? If the answer is anything other than an unqualified yes, please provide the basis for the response and explain why Ms. Pearce disagrees with the Commission's conclusion.

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
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**Response**

Please see the response to 13.08(b). Staff also objects to this request to the extent that the Commission's conclusion in ICC Docket Nos. 12-0511/0512 is adequately characterized by the above-quoted language. Staff cannot provide a conclusion on whether the statement accurately represents the Commission's conclusion.

- d) If Ms. Pearce has considered or reconsidered the Commission's decision in ICC Docket Nos. 12-0511/0512 (pages 164 and 169) since the filing of her [supplemental] direct, please submit revised Schedule 9.02 to reflect changes in her disallowed amounts based on her review of that decision.

**Response**

Please see the response to 13.08(b). In addition, Staff objects to this data request to the extent that it is inconsistent with the schedule in this proceeding as adopted at the April 12, 2013 Prehearing Conference in this Docket.

- e) Please indicate, with specificity for each cost disallowed in Schedule 9.01, why the disallowed expense is not a recoverable item in rates, based on the Commission's decision in ICC Docket Nos. 12-0511/0512 (pages 164 and 169). To the extent Ms. Pearce revises her schedules in response subpart d), the response can be tailored to reflect any changes in her disallowed amounts.

**Response**

Please see the response to AIC-Staff 13.08 (d).

Response to AIC's  
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Docket No. 13-0192  
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**AIC-Staff 13.09**

Does Ms. Pearce intend to adopt, in whole or in part, the opinions and comments in the direct testimony and schedules of Staff witness Knepler in ICC Docket No. 13-0301? If the answer is yes, please identify the specific opinions and comments in the direct testimony and schedules of Staff witness Knepler that Ms. Pearce intends to adopt (if not in whole).

**Response**

No.

Response to AIC's  
Thirteenth Set of Data Requests to Staff  
AIC-Staff 13.01 – 13.10  
Docket No. 13-0192  
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**AIC-Staff 13.10**

If Ms. Pearce intends to adopt, in whole or in part, the opinions and comments in the direct testimony and schedules of Staff witness Knepler in ICC Docket No. 13-0301, please confirm that Ms. Pearce adopts Mr. Knepler's responses to data requests AIC-Staff 4.05-4-20 in full. If Ms. Pearce does not adopt Mr. Knepler's responses to data requests AIC-Staff 4.05-4.20 in full, please identify the portions of his responses that she adopts.

**Response**

Not applicable.

Response to AIC-Staff DR 13 Series Attachment

Account 930.1, General Advertising Expenses		Ameren Illinois Electric 2012 Sponsorships and Community Outreach																			\$ Value of Tangible Person Benefits Allocable to Gas
Line No.	Recipient (a)	Total Electric (per Staff) (b)	Electric (c)	Gas (c)	Total (d)	Date of Event (e)	Location of Event (f)	Description of the Sponsorship (g)	Benefit to Attendees (h)	AIC Informational Messaging Description (i)	Advertising Channels (j)	AIC Booth (k)	Description of Tangible Personal Benefits (l)	AIC \$ Value of Tangible Personal Benefits (m)	Voucher (n)	Ad Example # (o)	Staff Disallowed (Sponsorships) GAS (p)	Staff Disallowed (Electric) (q)	Unnecessary for provision of Utility Service (r)	Does Not Provide Benefits to Ratepayers (s)	(t)
<b>SPONSORSHIPS</b>																					
1	BEARDSTOWN CHAMBER OF COMMERCE	463	463		463	100	Oct	Beardstown	Halloween festivities/candy	Public Welfare	Safety										
a	DONATION FOR HALLOWEEN CANDY		100		100	363	June	Beardstown	Community Outreach	Public Welfare	Energy Efficiency			1693410				100			
b	MEMBERSHIP DUES & CONTRIBUTION		363		363									1592791				363			
2	BELLEVILLE EAST HIGH SCHOOL	300	300	200	500	500	Nov	Belleville	Event Sponsor -Hockey Team Run	Public Welfare	Safety						200	300	x	x	
a	HOCKEY TEAM THANKSGIVING SK RUN		200		200									1704783							
3	BEVERLY FARM FOUNDATION	225	225	150	375	375	June	Godfrey	Beverly Farm Event	Public Welfare	Safety						150	225	x	x	150
a	6/1/2012 BEVERLY FARMS GOLF TOURNAMENT FUNDRAISER		225	150	375	340	May	Belleville	Big Brothers Big Sisters Event	Public Welfare	Safety						136	204	x	x	
4	BIG BROTHERS & BIG SISTERS	204	204	136	340	340	May	Belleville	Big Brothers Big Sisters Event	Public Welfare	Safety						136	204	x	x	
a	LADIES GOLF TOURNAMENT TEAM REGISTRATION		204	136	340																
5	BRADLEY UNIVERSITY	7,500	7,500	5,000	12,500	12,500	Oct	Peoria	Bradley Athletics	Public Welfare	Energy Efficiency										
a	BRADLEY ATHLETICS SPONSORSHIP		7,500	5,000	12,500																
6	CENTRAL ILLINOIS BLACK EXPO	900	900	600	1,500	1,500	Oct	Peoria	Exposition	Public Welfare	Energy Efficiency										
a	16TH ANNUAL EXPO		900	600	1,500																
7	CENTRAL ILLINOIS BUSINESS PUBLISHERS	2,376	2,376	1,584	3,960	3,960	Nov	Peoria	Ad space donated to not for profits	Public Welfare	Various										
a	INTERBUSINESS ISSUES NOT FOR PROFIT SPONSORSHIPS		2,376	1,584	3,960																
8	CENTRAL ILLINOIS WW II REENACTMENT	300	300	200	500	500	Mar	Tremont	World War II Reenactment Events	Public Welfare	Safety										
a	WORLD WAR II REENACTMENT BOOK AD		300	200	500																
9	CHILDRENS HOME	1,500	1,500	1,000	2,500	2,500	Mar	Peoria	Mauli Jim Chantry Event	Public Welfare	Safety										
a	MAULI JIM CHANTRY GOLF CLASSIC SPONSORSHIP		1,500	1,000	2,500																
10	CITY OF EAST PEORIA	1,200	1,200	800	2,000	2,000	Dec	East Peoria	Festival of Lights	Public Welfare	Safety										
a	FESTIVAL OF LIGHTS PARADE WHALE FLOAT		1,200	800	2,000																
11	CITY OF ELMWOOD	300	300	200	500	500	May	Elmwood	Canine program	Public Welfare	Safety										
a	CANINE PROGRAM SPONSORSHIP		300	200	500																
12	CITY OF HILLSBORO ILLINOIS	1,200	1,200	800	2,000	2,000	July	Hillsboro	Lighting at Sports Complex	Public Welfare	Safety										
a	PAYMENT 5 OF 5 LIGHTING AT SPORTS COMPLEX		1,200	800	2,000																
13	CITY OF PEORIA ILLINOIS	1,500	1,500	1,000	2,500	2,500	Jan	Peoria	Luncheon/Speaker sponsorship	Public Welfare	Diversity										
a	SPONSORSHIP - State of the City		1,500	1,000	2,500																
14	DANVILLE AREA COMMUNITY	900	900	600	1,500	1,500	Dec	Danville	NJCAA Men's National Basketball T	Public Welfare	Safety										
a	NJCAA MEN'S NATIONAL BASKETBALL TOURNAMENT		900	600	1,500																
15	DECATUR CELEBRATION	4,500	4,500	3,000	7,500	7,500	June	Decatur	Outdoor musical celebration	Public Welfare	Safety										
a	SPONSORSHIP OF OUTDOOR FESTIVAL		4,500	3,000	7,500																
16	DECATUR FUTURES CIVITY	4,320	4,320	2,880	7,200	7,200	June	Decatur	Tate and Lyle Player Championship Public Welfare	Energy Efficiency	Banner, Signage	Booth	golf, tickets ever	5,000			2,880	4,320	x	x	2,000
a	TATE AND LYLE PLAYERS CHAMPIONSHIP SPONSORSHIP		4,320	2,880	7,200																
17	DECATUR HUMAN RELATIONS	600	600	400	1,000	1,000	Jan	Decatur	Scholarship and Banquet	Public Welfare	Diversity										
a	MLK SCHOLARSHIP BANQUET		600	400	1,000																
18	DECATUR PARK DISTRICT	6,000	6,000	4,000	10,000	10,000	Summe	Decatur	Park Singers and First Tee (golf for	Public Welfare	Safety										
a	DECATUR PARK SINGERS AND FIRST TEE SPONSORSHIP		6,000	4,000	10,000																
19	DECATUR PUBLIC SCHOOL	3,000	3,000	2,000	5,000	5,000	Novem	Decatur	High School Basketball Tournamen	Public Welfare	Energy Efficiency										
b	TURKEY TOURNAMENT BASKETBALL SPONSORSHIP		3,000	2,000	5,000																
20	EDWARDSVILLE GLEN CARBON CHAMBER	387	387	258	645	645	June	Edwardsville	Chamber event and fundraiser	Public Welfare	Energy Efficiency										
a	6/22/2012 EDWARDSVILLE/GLEN CARBON CHAMBER OF COMM		387	258	645																
21	EDWARDSVILLE ROTARY	312	312	208	520	520	May	Edwardsville	Rotary event and fundraiser	Public Welfare	Energy Efficiency										
a	30TH ANNUAL ROTARY FUNDRAISER ON MAY 18, 2012. CO		312	208	520																
22	FIGHTING ILLINI SPOR	3,041	3,041	2,027	5,068	5,068	Winter	Champaign	Basketball	Public Welfare	Safety										
a	MENS BASKETBALL SEASON TICKETS		1,529	1,019	2,548																
b	UNIVERSITY OF ILLINOIS FOOTBALL SEASON TICKETS		1,512	1,008	2,520																
23	FRIENDS OF ST JOSEPH	150	150	100	250	250	April	Highland	Annual spring gala	Public Welfare	Safety										
a	2 TICKETS FOR KAREN BOULANGER & GUEST TO REPRESENT		150	100	250																
24	Gibbs-Monroe(LCmtyR	864	864	576	1,440	1,440															
a	Purchases - Other (RT BX)-SOUTHERN ILLINOIS MINER		864	576	1,440																
25	GOSHEN ROTARY	393	393	262	655	655	May	Edwardsville	Fundraiser- For the Kids	Public Welfare	Other										
a	CONTRIBUTION FOR GOSHEN ROTARY GOLF SCRAMBLE		393	262	655																
26	GREATER BELLEVILLE CHAMBER OF COMMERCE	60	60	40	100	100	April	Belleville	ActOnEnergy newsletter ad	Public Welfare	Energy Efficiency										
a	GREATER BELLEVILLE CHAMBER OF COMMERCE		60	40	100																
27	GREATER DECATUR CHAM	4,500	4,500	3,000	7,500	7,500	July	Decatur	Event Sponsor -Thanksgiving Lunch	Public Welfare	Energy Efficiency										
a	THANKSGIVING LUNCHEON SPONSORSHIP		4,500	3,000	7,500																
28	GREATER EFFINGHAM CH	150	150	100	250	250	April	Effingham	Annual golf outing, hole sponsor	Public Welfare	Safety										
a	EFFINGHAM CHAMBER OF COMMERCE GOLF OUTING		150	100	250																
29	HEART OF ILLINOIS UNITED WAY	106	106	70	176	176	August	Peoria	Kick-off breakfast	Public Welfare	Safety										
a	KICKOFF BREAKFAST		106	70	176																
30	HOSPICE OF SOUTHERN ILLINOIS	300	300	200	500	500	Marion	Red Carpet Gala	Public Welfare	Safety											
a	RED CARPET GALA		300	200	500																
31	ILLINOIS CENTRAL COLLEGE	1,500	1,500	1,000	2,500	2,500	April	East Peoria	Installation - Cougar Complex	Public Welfare	Safety										
a	COUGAR PLEX 2ND INSTALLMENT SPONSORSHIP		1,500	1,000	2,500																
32	ILLINOIS DEPARTMENT OF AGRICULTURE	6,000	6,000	4,000	10,000	10,000	July	Springfield	Sponsor area/booth	Public Welfare	Energy Efficiency										
a	ILLINOIS STATE FAIR SPONSORSHIP		6,000	4,000	10,000																
33	ILLINOIS HIGH SCHOOL ASSOCIATION	25,500	25,500	17,000	42,500	42,500	March	Peoria	Event Sponsor	Public Welfare	Energy Efficiency										
a	MARCH MACHINES/EXPERIENCE SPONSORSHIP/BANQUET		25,500	17,000	42,500																
34	ILLINOIS INSTITUTE OF TECHNOLOGY	9,000	9,000	6,000	15,000	15,000	August	Chicago	Event Sponsor	Public Welfare	Safety										
a	SPONSORSHIP FOR GREAT LAKES SYMPOSIUM ON SMART GRID and the new Energy Economy		9,000	6,000	15,000																
35	ILLINOIS STATE BLACK CHAMBER	6,000	6,000	4,000	10,000	10,000	July	Peoria	Event Sponsor	Public Welfare	Diversity, jobs										
a	SPONSORSHIP OF CHAMBER CONVENTION		6,000	4,000	10,000																
36	ILLINOIS VALLEY PUBLIC TELECOMMUNICATIONS	2,880	2,880	1,920	4,800	4,800	Jan	Peoria	Program Sponsor	Public Welfare	Energy Efficiency										
a	PROGRAM UNDERWRITING - Hometime		2,880	1,920	4,80																

Response to AIC-Staff DR 13 Series Attachment

Account 930.1, General Advertising Expenses		Ameren Illinois Electric 2012 Sponsorships and Community Outreach																				
Line No.	Recipient	Total Electric (per Staff)	Electric	Gas	Total	Date of Event	Location of Event	Description of the Sponsorship	Benefit to Attendees	AIC Informational Messaging Description	Advertising Channels	AIC Booth	Description of Tangible Personal Benefits	AIC \$ Value of Tangible Personal Benefits	Voucher	Ad Example #	Staff Disallowed (Sponsorships) GAS	Staff Disallowed (Electric)	Unnecessary for provision of Utility Service	Does Not Provide Benefits to Ratepayers	\$ Value of Tangible Personal Benefits Allocable to Gas	
(a)	(b)	(c)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)		
<b>SPONSORSHIPS</b>																						
45	N A A C P OF PEORIA	600	600	400	1,000																	
a	FREEDOM FUND BANQUET	600	600	400	1,000	Oct	Peoria	Event Sponsor	Public Welfare	Diversity, jobs	Booklet		meals	400	1675332	9						
46	N E C A	600	600		600																	
a	CASH VOUCHERS ISSUED	600	600		600	Aug	Peoria	Tee Sponsor					tickets	600	1652759			N/A				
47	NORMAL CORNBELTERS	3,480	5,800	2,320	5,800																	
a	CORPORATE SPONSORSHIP	3,480	2,320		5,800	April	Normal	Program Sponsor	Public Welfare	Energy Efficiency	Scoreboard video		tickets	2,000	1543094	16						
48	OAKLEY LINDSAY CIVIC CENTER	297	198	495	495																	
a	2012 GEMS OUTFIELD SIGN	75	297	198	495	March	Quincy	Program Sponsor	Public Welfare	Other	Signage			-	1524417		198	297	x	x		
49	OLNEY & GREATER RICHLAND COUNTY CONTRIBUTION	75	75	50	125	July	Olney	Event Sponsor-Bicycle Classic	Public Welfare	Other	Trophies						50	75	x	x		
50	OLNEY LITTLE LEAGUE	30	30	20	50																	
a	2012 SIGN SPONSORSHIP	30	30	20	50	April	Olney	Program Sponsor	Public Welfare	Other	Signage						20	30	x	x		
51	Page1(LlCmyRIPA)	100	100		100																	
a	Miscellaneous: Richwoods Drama Program	100	100		100	March	Peoria	Event Sponsor- High School Drama	Public Welfare	Booklet	Booklet											
52	PAXTON AREA CHAMBER	60	60	40	100																	
a	DONATION TO THE PAXTON AREA CHAMBER	60	40		100	August	Paxton	Program Sponsor-Buy Paxton	Public Welfare	Other								40	60	x	x	
53	PAXTON BUCKLEY LODA UNIT SCHOOLS	45	45	35	80																	
a	2012 SWEDEN FENCE SIGN CAMPAIGN	45	45	35	80	April	Paxton	Program Sponsor-Baseball	Public Welfare	Other								35	45	x	x	
54	PEKIN AREA CHAMBER	300	300	200	500																	
a	ANNUAL MEETING SPONSOR	150	100	250	350	March	Peoria	Event Sponsor-Annual Meeting	Public Welfare	Other							100	150	x	x		
b	FIREWORKS CELEBRATION	150	100	250	350	May	Peoria	Event Sponsor- Fireworks	Public Welfare	Other							100	150	x	x		
55	PEKIN PARK DISTRICT	300	300	200	500																	
a	PEKIN BAND CONCERT SPONSORSHIP	300	200		500	May	Peoria	Event Sponsor- Band Concert	Public Welfare	Other							200	300	x	x		
56	PEORIA AREA CHAMBER	2,340	1,560	3,900	3,900																	
a	2012 COMMUNITY THANKSGIVING LUNCHEON	2,100	1,400	3,500	3,500	Nov	Peoria	Event Sponsor- Thanksgiving Luncheon	Public Welfare	Energy Efficiency	Program Speaker		meals	400	1660553							
b	STATE OF THE CITY ADDRESS	240	160	400	400	Feb	Peoria	Event Sponsor- State of the City	Public Welfare	Other			meals	400	1485838		160	240	x	x	160	
57	PEORIA AREA COMMUNITY EVENTS	726	484	1,210	1,210																	
a	SANTA CLAUS PARADE UNDER THE SEA FLOAT	600	400	1,000	1,000	Dec	Peoria	Event Sponsor-Santa Claus Parade	Public Welfare	Other	Float in parade							400	600	x	x	
b	YULE LIKE PEORIA POLE DECORATION	126	84	210	210	Oct	Peoria	Event Sponsor-Holiday Decorations	Public Welfare	Other							84	126	x	x		
58	PEORIA CHIEFS	2,880	1,920	4,800	4,800																	
a	SEASON TICKETS	2,880	1,920		4,800	Jan	Peoria	Baseball season tickets					tickets	4,800	1480136		1,920	2,880	x	x	1,920	
59	PEORIA CIVIC CENTER	28,602	19,068	47,669	47,669																	
a	BROADWAY THEATER SERIES SPONSORSHIP	16,500	11,000	27,500	27,500	Nov	Peoria	Program Sponsor- Broadway Theat	Public Welfare	Other			tickets	17,000	1640162		11,000	16,500	x	x	6,800	
b	Peoria Civic Center Signage Agreement	10,584	7,056	17,640	17,640	Jan	Peoria	Program Sponsor-Civic Center	Public Welfare	Energy Efficiency	Signage, Internet				-	1481062		7,056	10,584	x	x	
c	PURCHASING RATE	318	212	530	530														212	318	x	x
d	WORLDFEST SPONSORSHIP	1,200	800	2,000	2,000	Nov	Peoria	Event Sponsor - Worldfest	Public Welfare	Other								800	1,200	x	x	
60	PEORIA OFFICIALS ASSOCIATION	150	150	100	250																	
a	SPONSORSHIP - HOSPITALITY ROOM AT MARCH MADNESS	150	100	250	250	Mar	Peoria	Event Sponsor- IHSA Officials	Public Welfare				meals	250	1514831		100	150	x	x	100	
61	PEORIA RIVERMEN HOCKEY	24,182	16,122	40,304	40,304																	
a	SPONSORSHIP	24,182	16,122		40,304	Nov	Peoria	Program Sponsor - Goals for Kids	Public Welfare	Energy Efficiency, K	Booklet		tickets	6,000	1702070	17	16,122	24,182	x	x	2,400	
62	PEORIA SYMPHONY ORCHESTRA	3,000	2,000	5,000	5,000																	
a	SPONSORSHIP 115TH SEASON	3,000	2,000		5,000	July	Peoria	Program Sponsor- Symphony	Public Welfare	Other			tickets	750	1622992		2,000	3,000	x	x	300	
63	QUINCY AREA	1,140	760	1,900	1,900																	
a	QUINCY GEMS BASEBALL SPONSORSHIP*	1,140	760		1,900	Jan	Quincy	Baseball season tickets	Public Welfare	Other			tickets	400			760	1,140	x	x	160	
64	RIVERBEND GROWTH ASSOCIATION	300	300	200	500																	
a	CONTRIBUTION FOR GOSHEN ROTARY GOLF SCRAMBLE	300	200	500	500	May	Godfrey	Event Sponsor - For the Kids	Public Welfare	Other			tickets	500	1568535		200	300	x	x	200	
65	ROBINSON CHAMBER	120	120	80	200																	
a	SILVER SPONSORSHIP 2012 OUTING	120	80	200	200	May	Robinson	Event Sponsor - BBQ	Public Welfare	Other							80	120	x	x		
66	ROBINSON GIRLS SOFTBALL ASSOCIATION	90	90	60	150																	
a	2012 PAINT THE PARK PINK DONATION TO THE ROBINSON	90	60	150	150	April	Robinson	Event Sponsor - Paint the Park Pink	Public Welfare	Other								60	90	x	x	
67	S P A R C	600	600	400	1,000																	
a	STARRY NIGHT EVENT SCOTT WISEMAN ON BOARD	600	400	1,000	1,000	Sept	Springfield	Event Sponsor - Starry Night	Public Welfare	Other									400	600	x	x
68	SOUTHWESTERN ILLINOIS EMPLOYERS ASC	900	600	1,500	1,500																	
a	ANNUAL MEETING	900	600	1,500	1,500	Nov	Woodriver	Event Sponsor-Annual Meeting	Public Welfare	Other									600	900	x	x
69	SOUTHWESTERN MADISON COUNTY CHAMBER	429	286	715	715																	
a	CONTRIBUTION FOR DAN BROWN MEMORIAL FUNDRAISER	429	286	715	715	July	Granite City	Fundraiser Contribution	Public Welfare	Other									286	429	x	x
70	SPRINGFIELD URBAN LEAGUE	390	260	650	650																	
a	TABLE AT AWARDS DINNER	390	260	650	650	Nov	Springfield	Event Sponsor- Awards Dinner					meals	650	1710191		260	390	x	x	260	
71	TAYLORVILLE OPTIMIST CLUB	1,200	800	2,000	2,000																	
a	OPTIMIST TOURNAMENT SPONSORSHIP	1,200	800	2,000	2,000	April	Taylorville	Event Sponsor - Optimist Tournam	Public Welfare	Other									800	1,200	x	x
72	TAZEWELL COLUMBUS CLUB	600	400	1,000	1,000																	
a	PUNKIN CHUCKIN SPONSORSHIP	600	400	1,000	1,000	Sept	Morton	Event Sponsor - Punkin Chuckin	Public Welfare	Other			tickets	40	1657538		400	600	x	x	16	
73	TIMOTHY FOX	163	158	5	163																	
a	Editing & Writing support on an as needed basis	163	158	5	163	July	Peoria	Ameren Journal - Resources on Demand														
b	PURCHASING RATE	5	5		5																	
74	TRI COUNTY URBAN LEAGUE	840	560	1,400	1,400																	
a	URBAN LEAGUE'S GALA ENTERTAINMENT	840	560	1,400	1,400	June	Peoria	Event Sponsor - Entertainment	Public Welfare	Other			meals	1,400	1588537		560	840	x	x	560	
75	U S CELLULAR COLISEUM	6,000	4,000	10,000	10,000																	
a	ADVERTISING PARTNERSHIP FOR 2012	6,000	4,000	10,000	10,000	June	Bloomington	Program Sponsor - Coliseum	Public Welfare	Energy Efficiency	Signage								4,000	6,000	x	x
76	UNITED WAY OF CHRISTIAN COUNTY	240	160	400	400																	
a	LIWCCC RANDY FRANCE MEMORIAL GOLF TOURNAMENT	240	160	400	400	April	Taylorville	Event Sponsor - Hole Sponsor					golf	400	1553520		160	240	x	x	160	
77	VILLAGE OF BATH	60	60	40	100																	
a	FISH FRY SPONSORSHIP	60	40	100	100	July	Bath	Event Sponsor - Fish Fry	Public Welfare													

Account 930.1, General Advertising Expenses

Ameren Illinois Electric  
2012 Sponsorships and Community Outreach

Line No.	Recipient	Total Electric (per Staff)	Electric	Gas	Total	Date of Event	Location of Event	Description of the Sponsorship	Benefit to Attendees	AIC Informational Messaging Description	Advertising Channels	AIC Booth	Description of Tangible Personal Benefits	AIC \$ Value of Tangible Personal Benefits	Voucher	Ad Example #	Staff Disallowed (Sponsorships) GAS	Staff Disallowed (Electric)	Unnecessary for provision of Utility Service	Does Not Provide Benefits to Ratepayers	\$ Value of Tangible Person Benefits Allocable to Gas
(a)	(b)	(c)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)	
<b>SPONSORSHIPS</b>																					
1	BEARDSTOWN CHAMBER OF COMMERCE	\$463	463		463	100	Oct	Beardstown	Halloween festivities/candy	Public Welfare	Safety										
a	DONATION FOR HALLOWEEN CANDY		100		100	363	June	Beardstown	Community Outreach	Public Welfare	Energy Efficiency										
b	MEMBERSHIP DUES & CONTRIBUTION		363		363																
2	BELLEVILLE EAST HIGH SCHOOL	300	300	200	500	500	Nov	Belleville	Event Sponsor -Hockey Team Run	Public Welfare	Safety										
a	HOCKEY TEAM THANKSGIVING SK RUN		200		200																
3	BEVERLY FARM FOUNDATION	225	225	150	375	375	June	Godfrey	Beverly Farm Event	Public Welfare	Safety										
a	6/1/2012 BEVERLY FARMS GOLF TOURNAMENT FUNDRAISER		150		150	340	May	Belleville	Big Brothers Big Sisters Event	Public Welfare	Safety										
4	BIG BROTHERS & BIG SISTERS	204	204	136	340	340	May	Belleville	Big Brothers Big Sisters Event	Public Welfare	Safety										
a	LADIES GOLF TOURNAMENT TEAM REGISTRATION		136		136																
5	BRADLEY UNIVERSITY	7,500	5,000	12,500	5,000	12,500	Oct	Peoria	Bradley Athletics	Public Welfare	Energy Efficiency										
a	BRADLEY ATHLETICS SPONSORSHIP		5,000		5,000																
6	CENTRAL ILLINOIS BLACK EXPO	900	900	600	1,500	1,500	Oct	Peoria	Exposition	Public Welfare	Energy Efficiency										
a	16TH ANNUAL EXPO		600		600																
7	CENTRAL ILLINOIS BUSINESS PUBLISHERS	2,376	1,584	3,960	2,376	3,960	Nov	Peoria	Ad space donated to not for profits	Public Welfare	Various										
a	INTERBUSINESS ISSUES NOT FOR PROFIT SPONSORSHIPS		1,584		1,584																
8	CENTRAL ILLINOIS WW II REENACTMENT	300	300	200	500	500	Mar	Tremont	World War II Reenactment Events	Public Welfare	Safety										
a	WORLD WAR II REENACTMENT BOOK AD		200		200																
9	CHILDRENS HOME	1,500	1,000	2,500	1,500	2,500	Mar	Peoria	Mauli Jim Chanty Event	Public Welfare	Safety										
a	MAULI JIM CHARTY GOLF CLASSIC SPONSORSHIP		1,000		1,000																
10	CITY OF EAST PEORIA	1,200	800	2,000	1,200	2,000	Dec	East Peoria	Festival of Lights	Public Welfare	Safety										
a	FESTIVAL OF LIGHTS PARADE WHALE FLOAT		800		800																
11	CITY OF ELMWOOD	300	300	200	500	500	May	Elmwood	Canine program	Public Welfare	Safety										
a	CANINE PROGRAM SPONSORSHIP		200		200																
12	CITY OF HILLSBORO ILLINOIS	1,200	800	2,000	1,200	2,000	July	Hillsboro	Lighting at Sports Complex	Public Welfare	Safety										
a	PAYMENT 5 OF 5 LIGHTING AT SPORTS COMPLEX		800		800																
13	CITY OF PEORIA ILLINOIS	1,500	1,000	2,500	1,500	2,500	Jan	Peoria	Luncheon/Speaker sponsorship	Public Welfare	Diversity										
a	SPONSORSHIP - State of the City		1,000		1,000																
14	DANVILLE AREA COMMUNITY	900	900	600	1,500	1,500	Dec	Danville	NJCAA Men's National Basketball T	Public Welfare	Safety										
a	NJCAA MEN'S NATIONAL BASKETBALL TOURNAMENT		600		600																
15	DECATUR CELEBRATION	4,500	3,000	7,500	4,500	7,500	June	Decatur	Outdoor musical celebration	Public Welfare	Safety										
a	SPONSORSHIP OF OUTDOOR FESTIVAL		3,000		3,000																
16	DECATUR FUTURES CIVITY	4,320	2,880	7,200	4,320	7,200	June	Decatur	Tate and Lyle Player Championship Public Welfare	Energy Efficiency	Banner, Signage	Booth	golf, tickets ever	5,000	1532939	2,880	4,320	x	x	2,000	
a	TATE AND LYLE PLAYERS CHAMPIONSHIP SPONSORSHIP		2,880		2,880																
17	DECATUR HUMAN RELATIONS	600	400	1,000	600	1,000	Jan	Decatur	Scholarship and Banquet	Public Welfare	Diversity										
a	MLK SCHOLARSHIP BANQUET		400		400																
18	DECATUR PARK DISTRICT	6,000	4,000	10,000	6,000	10,000	Summe	Decatur	Park Singers and First Tee (golf for	Public Welfare	Safety										
a	DECATUR PARK SINGERS AND FIRST TEE SPONSORSHIP		4,000		4,000																
19	DECATUR PUBLIC SCHOOL	3,000	2,000	5,000	3,000	5,000	Novem	Decatur	High School Basketball Tournamen	Public Welfare	Energy Efficiency										
b	TURKEY TOURNAMENT BASKETBALL SPONSORSHIP		2,000		2,000																
20	EDWARDSVILLE GLEN CARBON CHAMBER	387	258	645	387	645	June	Edwardsville	Chamber event and fundraiser	Public Welfare	Energy Efficiency										
a	6/22/2012 EDWARDSVILLE/GLEN CARBON CHAMBER OF COMM		258		258																
21	EDWARDSVILLE ROTARY	312	208	520	312	520	May	Edwardsville	Rotary event and fundraiser	Public Welfare	Energy Efficiency										
a	30TH ANNUAL ROTARY FUNDRAISER ON MAY 18, 2012. CO		208		208																
22	FIGHTING ILLINI SPOR	3,041	2,027	5,068	3,041	5,068	Winter	Champaign	Basketball												
a	MENS BASKETBALL SEASON TICKETS		2,027		2,027																
23	UNIVERSITY OF ILLINOIS FOOTBALL SEASON TICKETS	150	100	250	150	250	Fall	Champaign	Football												
a	2 TICKETS FOR KAREN BOULANGER & GUEST TO REPRESENT		100		100																
24	Gibbs-Monroe(LCmtyR	864	576	1,440	864	1,440															
a	Purchases - Other (RT BK)-SOUTHERN ILLINOIS MINER		576		576																
25	GOSHEN ROTARY	393	262	655	393	655	May	Edwardsville	Fundraiser- For the Kids	Public Welfare	Other										
a	CONTRIBUTION FOR GOSHEN ROTARY GOLF SCRAMBLE		262		262																
26	GREATER BELLEVILLE CHAMBER OF COMMERCE	60	40	100	60	100	April	Belleville	ActOnEnergy newsletter ad	Public Welfare	Energy Efficiency										
a	GREATER BELLEVILLE CHAMBER OF COMMERCE		40		40																
27	GREATER DECATUR CHAM	4,500	3,000	7,500	4,500	7,500	July	Decatur	Event Sponsor -Thanksgiving Lunch	Public Welfare	Energy Efficiency										
a	THANKSGIVING LUNCHEON SPONSORSHIP		3,000		3,000																
28	GREATER EFFINGHAM CH	150	100	250	150	250	April	Effingham	Annual golf outing, hole sponsor												
a	EFFINGHAM CHAMBER OF COMMERCE GOLF OUTING		100		100																
29	HEART OF ILLINOIS UNITED WAY	106	70	176	106	176	August	Peoria	Kick-off breakfast												
a	KICKOFF BREAKFAST		70		70																
30	HOSPICE OF SOUTHERN ILLINOIS	300	200	500	300	500	Marion	Red Carpet Gala													
a	RED CARPET GALA		200		200																
31	ILLINOIS CENTRAL COLLEGE	1,500	1,000	2,500	1,500	2,500	April	East Peoria	Installation - Cougar Complex	Public Welfare	Safety										
a	COUGAR PLEX 2ND INSTALLMENT SPONSORSHIP		1,000		1,000																
32	ILLINOIS DEPARTMENT OF AGRICULTURE	6,000	4,000	10,000	6,000	10,000	July	Springfield	Sponsor area/booth	Public Welfare	Energy Efficiency										
a	ILLINOIS STATE FAIR SPONSORSHIP		4,000		4,000																
33	ILLINOIS HIGH SCHOOL ASSOCIATION	25,500	17,000	42,500	25,500	42,500	March	Peoria	Event Sponsor	Public Welfare	Energy Efficiency										
a	MARCH MACHINERY EXPERIENCE SPONSORSHIP/BANQUET		17,000		17,000																
34	ILLINOIS INSTITUTE OF TECHNOLOGY	9,000	6,000	15,000	9,000	15,000	15,000	August	Chicago	Event Sponsor	Public Welfare	Safety									
a	SMART GRID and the new Energy Economy		6,000		6,000																
35	ILLINOIS STATE BLACK CHAMBER	6,000	4,000	10,000	6,000	10,000	July	Peoria	Event Sponsor	Public Welfare	Diversity, jobs										
a	SPONSORSHIP OF CHAMBER CONVENTION		4,000		4,000																
36	ILLINOIS VALLEY PUBLIC TELECOMMUNICATIONS	2,880	1,920	4,800	2,880	4,800	Jan	Peoria	Program Sponsor	Public Welfare	Energy Efficiency										
a	PROGRAM UNDERWRITING - Hometime		1,920		1,920																
37	JACKSONVILLE AREA CHAMBER	90	60	150	90	150	May	Jacksonville	Event Sponsor	Public Welfare	Safety										
a	SPONSORSHIP		60		60																
38	JEAN WILSON - RED CROSS FUNDRAISER	135	135	135	135	135	Jan	Ottawa	Program Sponsor	Public Welfare											

Ameren Illinois Electric  
2012 Sponsorships and Community Outreach

Account 930.1, General Advertising Expenses

Line No.	Recipient	Total Electric (per Staff)	Electric	Gas	Total	Date of Event	Location of Event	Description of the Sponsorship	Benefit to Attendees	AIC Informational Messaging Description	Advertising Channels	AIC Booth	Description of Tangible Personal Benefits	AIC \$ Value of Tangible Personal Benefits	Voucher	Ad Example #	Staff (Sponsorships) GAS	Staff (Disallowed) (Electric)	Unnecessary for provision of Utility Service	Does Not Provide Benefits to Ratepayers	\$ Value of Tangible Personal Benefits Allocable to Gas
(a)	(b)	(c)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)	(l)	(m)	(n)	(o)	(p)	(q)	(r)	(s)	(t)	
<b>SPONSORSHIPS</b>																					
45	N A A C P OF PEORIA	600	600	400	1,000																
a	FREEDOM FUND BANQUET	600	600	400	1,000	Oct	Peoria	Event Sponsor	Public Welfare	Diversity, jobs	Booklet	meals	400	1675332	9						
46	N E C A	600	600		600																
a	CASH VOUCHERS ISSUED	600	600		600	Aug	Peoria	Tee Sponsor				tickets	600	1652759			N/A				
47	NORMAL CORN BELTERS	3,480	5,800	2,320	5,800																
a	CORPORATE SPONSORSHIP	3,480	2,320		5,800	April	Normal	Program Sponsor	Public Welfare	Energy Efficiency	Scoreboard video	tickets	2,000	1543094	16						
48	OAKLEY LINDSAY CIVIC CENTER	297	198	495	495																
a	2012 GEMS OUTFIELD SIGN	75	297	198	495	March	Quincy	Program Sponsor	Public Welfare	Other	Signage		-	1524417		198	297	x		x	
49	OLNEY & GREATER RICHLAND COUNTY CONTRIBUTION	75	75	50	125	July	Olney	Event Sponsor-Bicycle Classic	Public Welfare	Other	Trophies		-	1616648		50	75	x		x	
50	OLNEY LITTLE LEAGUE	30	30	20	50																
a	2012 SIGN SPONSORSHIP	30	30	20	50	April	Olney	Program Sponsor	Public Welfare	Other	Signage		-	1551134		20	30	x		x	
51	Page1(LlCmyRIPA)	100	100		100																
a	Miscellaneous: Richwoods Drama Program	100	100		100	March	Peoria	Event Sponsor- High School Drama	Public Welfare	Booklet	Booklet		-	1637750	20						
52	PAXTON AREA CHAMBER	60	60	40	100																
a	DONATION TO THE PAXTON AREA CHAMBER	60	40		100	August	Paxton	Program Sponsor-Buy Paxton	Public Welfare	Other			-	1637750		40	60	x		x	
53	PAXTON BUCKLEY LODA UNIT SCHOOLS	45	45	35	80																
a	2012 SWEDEN FENCE SIGN CAMPAIGN	45	45	35	80	April	Paxton	Program Sponsor-Baseball	Public Welfare	Other			-	1539965		35	45	x		x	
54	PEKIN AREA CHAMBER	300	300	200	500																
a	ANNUAL MEETING SPONSOR	150	100	250	250	March	Peoria	Event Sponsor-Annual Meeting	Public Welfare	Other			-	1515753		100	150	x		x	
b	FIREWORKS CELEBRATION	150	100	250	250	May	Peoria	Event Sponsor- Fireworks	Public Welfare	Other			-	1264975		100	150	x		x	
55	PEKIN PARK DISTRICT	300	300	200	500																
a	PEKIN BAND CONCERT SPONSORSHIP	300	200	500	500	May	Peoria	Event Sponsor- Band Concert	Public Welfare	Other			-	1564915		200	300	x		x	
56	PEORIA AREA CHAMBER	2,340	1,560	3,900	3,900																
a	2012 COMMUNITY THANKSGIVING LUNCHEON	2,100	1,400	3,500	3,500	Nov	Peoria	Event Sponsor- Thanksgiving Luncheon	Public Welfare	Energy Efficiency	Program Speaker	meals	400	1660553		160	240	x		x	
b	STATE OF THE CITY ADDRESS	240	160	400	400	Feb	Peoria	Event Sponsor- State of the City	Public Welfare	Other		meals	400	1485838		160	240	x		x	160
57	PEORIA AREA COMMUNITY EVENTS	726	484	1,210	1,210																
a	SANTA CLAUS PARADE UNDER THE SEA FLOAT	600	400	1,000	1,000	Dec	Peoria	Event Sponsor-Santa Claus Parade	Public Welfare	Other	Float in parade		-	1679613		400	600	x		x	
b	YULE LIKE PEORIA POLE DECORATION	126	84	210	210	Oct	Peoria	Event Sponsor-Holiday Decorations	Public Welfare	Other			-	1694456		84	126	x		x	
58	PEORIA CHIEFS	2,880	1,920	4,800	4,800																
a	SEASON TICKETS	2,880	1,920	4,800	4,800	Jan	Peoria	Baseball season tickets				tickets	4,800	1480136		1,920	2,880	x		x	1,920
59	PEORIA CIVIC CENTER	28,602	19,068	47,669	47,669																
a	BROADWAY THEATER SERIES SPONSORSHIP	16,500	11,000	27,500	27,500	Aug	Peoria	Program Sponsor- Broadway Theat	Public Welfare	Other		tickets	17,000	1640162		11,000	16,500	x		x	6,800
b	Peoria Civic Center Signage Agreement	10,584	7,056	17,640	17,640	Jan	Peoria	Program Sponsor-Civic Center	Public Welfare	Energy Efficiency	Signage, Internet		-	1481062		7,056	10,584	x		x	
c	PURCHASING RATE	318	212	530	530																
d	WORLDFEST SPONSORSHIP	1,200	800	2,000	2,000	Nov	Peoria	Event Sponsor - Worldfest	Public Welfare	Other			-	1705698		800	1,200	x		x	
60	PEORIA OFFICIALS ASSOCIATION	150	150	100	250																
a	SPONSORSHIP - HOSPITALITY ROOM AT MARCH MADNESS	150	100	250	250	Mar	Peoria	Event Sponsor- IHSA Officials	Public Welfare			meals	250	1514831		100	150	x		x	100
61	PEORIA RIVERMEN HOCKEY	24,182	16,122	40,304	40,304																
a	SPONSORSHIP	24,182	16,122	40,304	40,304	Nov	Peoria	Program Sponsor - Goals for Kids	Public Welfare	Energy Efficiency, K	Booklet	tickets	6,000	1702070	17	16,122	24,182	x		x	2,400
62	PEORIA SYMPHONY ORCHESTRA	3,000	2,000	5,000	5,000																
a	SPONSORSHIP 115TH SEASON	3,000	2,000	5,000	5,000	July	Peoria	Program Sponsor- Symphony	Public Welfare	Other		tickets	750	1622992		2,000	3,000	x		x	300
63	QUINCY AREA	1,140	760	1,900	1,900																
a	QUINCY GEMS BASEBALL SPONSORSHIP*	1,140	760	1,900	1,900	Jan	Quincy	Baseball season tickets	Public Welfare	Other		tickets	400			760	1,140	x		x	160
64	RIVERBEND GROWTH ASSOCIATION	300	300	200	500																
a	CONTRIBUTION FOR GOSHEN ROTARY GOLF SCRAMBLE	300	200	500	500	May	Godfrey	Event Sponsor - For the Kids	Public Welfare	Other		tickets	500	1568535		200	300	x		x	200
65	ROBINSON CHAMBER	120	120	80	200																
a	SILVER SPONSORSHIP 2012 OUTING	120	80	200	200	May	Robinson	Event Sponsor - BBQ	Public Welfare	Other			-	1573039		80	120	x		x	
66	ROBINSON GIRLS SOFTBALL ASSOCIATION	90	90	60	150																
a	2012 PAINT THE PARK PINK DONATION TO THE ROBINSON	90	60	150	150	April	Robinson	Event Sponsor - Paint the Park Pink	Public Welfare	Other			-	1540089		60	90	x		x	
67	S P A R C	600	600	400	1,000																
a	STARRY NIGHT EVENT SCOTT WISEMAN ON BOARD	600	400	1,000	1,000	Sept	Springfield	Event Sponsor - Starry Night	Public Welfare	Other			-	1670331		400	600	x		x	
68	SOUTHWESTERN ILLINOIS EMPLOYERS ASC	900	600	1,500	1,500																
a	ANNUAL MEETING	900	600	1,500	1,500	Nov	Woodriver	Event Sponsor-Annual Meeting	Public Welfare	Other			-	1702129		600	900	x		x	
69	SOUTHWESTERN MADISON COUNTY CHAMBER	429	286	715	715																
a	CONTRIBUTION FOR DAN BROWN MEMORIAL FUNDRAISER	429	286	715	715	July	Granite City	Fundraiser Contribution	Public Welfare	Other			-	1611191		286	429	x		x	
70	SPRINGFIELD URBAN LEAGUE	390	260	650	650																
a	TABLE AT AWARDS DINNER	390	260	650	650	Nov	Springfield	Event Sponsor- Awards Dinner				meals	650	1710191		260	390	x		x	260
71	TAYLORVILLE OPTIMIST CLUB	1,200	800	2,000	2,000																
a	OPTIMIST TOURNAMENT SPONSORSHIP	1,200	800	2,000	2,000	April	Taylorville	Event Sponsor - Optimist Tournam	Public Welfare	Other			-	1548724		800	1,200	x		x	
72	TAZEWELL COLUMBUS CLUB	600	600	400	1,000																
a	PUNKIN CHUCKIN SPONSORSHIP	600	400	1,000	1,000	Sept	Morton	Event Sponsor - Punkin Chuckin	Public Welfare	Other		tickets	40	1657538		400	600	x		x	16
73	TIMOTHY FOX	163	158	5	163																
a	Editing & Writing support on an as needed basis	163	158	5	163	July	Peoria	Ameren Journal - Resources on Demand					158	1614452				N/A			
b	PURCHASING RATE	5	5		5																
74	TRI COUNTY URBAN LEAGUE	840	560	1,400	1,400																
a	URBAN LEAGUE'S GALA ENTERTAINMENT	840	560	1,400	1,400	June	Peoria	Event Sponsor - Entertainment	Public Welfare			meals	1,400	1588537		560	840	x		x	560
75	U S CELLULAR COLISEUM	6,000	4,000	10,000	10,000																
a	ADVERTISING PARTNERSHIP FOR 2012	6,000	4,000	10,000	10,000	June	Bloomington	Program Sponsor - Coliseum	Public Welfare	Energy Efficiency	Signage		-	1580694		4,000	6,000	x		x	
76	UNITED WAY OF CHRISTIAN COUNTY	240	240	160	400																
a	LIWCCC RANDY FRANCE MEMORIAL GOLF TOURNAMENT	240	160	400	400	April	Taylorville	Event Sponsor - Hole Sponsor				golf	400	1553520		160	240	x		x	160
77	VILLAGE OF BATH	60	60	40	100																

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ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

Request AIC-Staff 12.01:

In Schedule 9.01, page 1 of 2, Note 1, Ms. Pearce states, “The results of Staff’s analysis show that consistent with the criteria set forth by the Commission in Docket No. 12-0293, certain purchases should not be recovered from ratepayers, as summarized on page 2 of Schedule 9.01.” Please provide Ms. Pearce’s understanding of the “criteria set forth by the Commission in Docket No. 12-0293.” In responding, please identify and list the specific “criteria” in the response without making general reference to Ms. Pearce’s testimony.

Response:

Staff objects to this request to the extent it calls for a legal conclusion. Notwithstanding, and without waiving this objection, Ms. Pearce states: The criteria that Ms. Pearce references on Schedule 9.01, page 1 of 2, Note 1, is found on pages 67– 69 of the Final Order in Docket No. 12-0293. These criteria include the following:

The listed P-Card charges are questionable because the expenses at some retailers are arguably excessive and/or not reasonably related to the provisioning of delivery services. In the absence of better support for these charges, the Commission finds that recovery from delivery service customers is unreasonable. P-Card charges that the Commission will disallow are . . . (see table at pp. 67 - 68 of Order)

The Commission conclusion further identifies specific expenses that appear unnecessary, including the following:

- Embroidering on clothing that employees wear during customer encounters;
- Purchases of various floral arrangements;
- Purchase of a table at the Peoria Gridiron Dinner wherein employees receive dinner and an evening’s entertainment;

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- Purchase of University of Illinois tickets to athletic events; and
- Service from Dish Network so that employees can track news and storm information (questionable given the prevalence of weather and news services on the internet).

While Ms. Pearce is not an attorney, based on the discussion provided by the Commission on pp. 66 – 69 of the Final Order in Docket No. 12-0293, Ms. Pearce concluded the Commission expects the P-card purchases to be necessary for the provision of utility service and to provide benefits to ratepayers. The Commission conclusion further explains that these criteria should be evaluated within the context not of general corporate standards, but within the context that ratepayers are captive customers who may not choose to go elsewhere for the services provided. Therefore, ratepayers do not have any alternative but to pay for the questionable charges once they have been included in rates. Accordingly, using this rationale and the examples provided in the Commission's conclusion, Ms. Pearce relied on the aforementioned information to develop the adjustment on ICC Staff Exhibit 9.0, Schedule 9.01

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Request AIC-Staff 12.02:

Please update Schedule 9.01, page 2 of 2, to identify the specific “criteria set forth by the Commission in Docket No. 12-0293” relied upon by Ms. Pearce to disallow each individual expense item. Please also perform a similar update of Ms. Pearce’s Schedule 3.04 (page 2 of 2) in ICC Docket 13-0301.

Response:

Please see Response to AIC-Staff 12 Series Attachment.

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Request AIC-Staff 12.03:

On page 2 of her supplemental direct (line 37), Ms. Pearce quotes the Commission's finding in ICC Docket No. 12-0293 that the specific expenses disallowed in that docket "at some retailers are arguably excessive...."

- a. Please identify each expense item listed on Schedule 9.01 (page 2 of 2) that Ms. Pearce considers "arguably excessive." If it is Ms. Pearce's contention that she believes each expense item identified on Schedule 9.01 (page 2 of 2) is "arguably excessive," please confirm. If conversely Ms. Pearce does not believe any of the expenses listed are "arguably excessive," please confirm.
- b. For the expenses identified by Ms. Pearce as "arguably excessive" in response to [No. 3a], please provide Ms. Pearce's definition of "arguably excessive."
- c. For each specific expense identified by Ms. Pearce as "arguably excessive" in response to [No. 3a], please provide the basis for Ms. Pearce's opinion.
- d. For each specific expense identified by Ms. Pearce as "arguably excessive" in response to [No. 3a], please provide Ms. Pearce's opinion on what she would consider to be a reasonable amount spent on the specific purchase.

Response:

Staff objects to this request to the extent it calls for a legal conclusion. Notwithstanding, and without waiving this objection, Ms. Pearce states:

- a. Please see Response to AIC-Staff DR 12 Series Attachment.
- b. Ms. Pearce quoted the description "arguably excessive" from the Commission's Order in Docket No. 12-0293, as noted above. While Ms. Pearce is not an attorney, Ms. Pearce understands this description to apply to expenses that could have been either avoided as unnecessary for the provision of utility service or potentially transacted at a lower cost.
- c. Please see response to No. 12.03b above.

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- d. For those items designated as “arguably excessive” on Response to AIC-Staff DR 12 Series Attachment, Ms. Pearce believes a reasonable expense for these items would be zero in the revenue requirement, since the costs could have been avoided or are not properly recoverable from ratepayers based on support provided by AIC.

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Request AIC-Staff 12.04:

On page 2 of her direct (lines 37-38), Ms. Pearce quotes the Commission's finding in ICC Docket No. 12-0293 that the specific expenses are "not reasonabl[y] related to the provision of delivery services."

- a) Please identify each expense item listed on Schedule 9.01 (page 2 of 2) that Ms. Pearce considers "not reasonabl[y] related to the provision of delivery services." If it is Ms. Pearce's contention that she believes each expense item identified on Schedule 9.01 (page 2 of 2) is "not reasonabl[y] related to the provision of delivery services," please confirm. If conversely Ms. Pearce does not believe any of the expenses listed are "not reasonabl[y] related to the provision of delivery services," please confirm.
- b) For each specific expense identified by Ms. Pearce as "not reasonabl[y] related to the provision of delivery services" in response to [No. 4a], please provide the basis for Ms. Pearce's opinion.

Response:

Staff objects to this request to the extent it calls for a legal conclusion. Notwithstanding, and without waiving this objection, Ms. Pearce states: Please see Response to AIC-Staff 12 Series Attachment.

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Request AIC-Staff 12.05:

In her direct testimony (ICC Staff Ex. 9.0, lines 75-91), Ms. Pearce provides a threefold rationale for her disallowance of employee credit card charges. This data request concerns her first rationale on lines 75-77 that the expenses are “not necessary for the provision of utility service.”

- a) Please identify each expense item listed on Schedule 9.01 (page 2 of 2) that Ms. Pearce considers “not necessary for the provision of utility service.” If it is Ms. Pearce’s contention that she believes each expense item identified on Schedule 9.01 (page 2 of 2) is “not necessary for the provision of utility service,” please confirm. If conversely Ms. Pearce does not believe any of the expenses listed are “not necessary for the provision of utility service,” please confirm.
- b) For each specific expense identified by Ms. Pearce as “not necessary for the provision of utility service” in response to [No. 5a], please provide the specific basis for Ms. Pearce’s opinion.
- c) Please indicate Ms. Pearce’s understanding of AIC’s use of the following items disallowed in Schedule 9.01 (Page 2 of 2):
  - i) Cell phones (lines 20, 23, 28, 30 & 31)
  - ii) Blackberries, holsters and chargers (lines 46, 37, 48, 50, 51 & 80)
  - iii) Bluetooth (line 81)
  - iv) TV for Champaign Storm Rm (line 44)
  - v) LCD TV (line 67)
  - vi) DVD player (line 69)
  - vii) Flat Screen TV (line 78)
  - viii) Flat Screen TV for ESTL OC (line 93)
  - ix) Digital cameras, USBs, Discs and Rechargeable batteries (line 94)
  - x) Monthly Svc for ESTL office (line 99)
  - xi) Direct TV (line 102)
  - xii) ESTL Cable (line 103)
- d) In Schedule 9.01 (page 2 of 2), Ms. Pearce makes several disallowance for food and beverages for “Safety” meetings (examples include lines 11, 14, 16, 17, 18, 19, 29, 34, 35, 36, 68, 70, 95, 106 & 107). Please provide Ms. Pearce’s

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understanding of the purpose of these various "Safety" meetings, to the extent she knows.

- e) In Schedule 9.01 (page 2 of 2) (lines 102-103), Ms. Pearce makes a disallowance for food and beverages provided to "Lawyers." Is Ms. Pearce aware whether the "Lawyers" in question were outside counsel or in-house lawyers?
- f) Please identify each specific reason that Ms. Pearce believes the cost of "McLean County Chamber Dues" (line 75) should be disallowed. In responding, please indicate Ms. Pearce's understanding of the purpose of the "McLean County Chamber Dues," to the extent she knows.
- g) Please identify each specific reason that Ms. Pearce believes the cost of donuts and baked goods for the "United Way mtg" (line 73) should be disallowed. In responding, please indicate Ms. Pearce's understanding of the purpose of the "United Way mtg," to the extent she knows.
- h) Please identify each specific reason that Ms. Pearce believes the expenses associated with the "Adopt a Family committee" (line 77) should be disallowed. In responding, please indicate Ms. Pearce's understanding of the purpose of the "Adopt a Family committee," to the extent she knows.
- i) Please identify each specific reason that Ms. Pearce believes the expenses associated with the "Junior Achievement Lunch" (line 36) should be disallowed. In responding, please indicate Ms. Pearce's understanding of the purpose of the "Junior Achievement Lunch," to the extent she knows.

Response:

- a) Please see Response to AIC-Staff DR 12 Series Attachment.
- b) Please see Response to AIC-Staff DR 12 Series Attachment.
- c) Ms. Pearce's understanding is based on the support provided by AIC in the response to DR BAP 20.01, as indicated in Note 1 of ICC Staff Exhibit 9.0, Schedule 9.01.
- d) Please see the response to 12.05(c) above.

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- e) Please see the response to 12.05(c) above. AIC provided no indication as to whether these charges relate to internal or external lawyers.
- f) Please see the response to 12.05(c) above.
- g) Please see the response to 12.05(c) above.
- h) Please see the response to 12.05(c) above.
- i) Please see the response to 12.05(c) above.

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Request AIC-Staff 12.06:

In her direct testimony (ICC Staff Ex. 9.0, lines 78-83), Ms. Pearce provides a threefold rationale for her disallowance of employee credit card charges. This data request concerns her second rationale on lines 78-85 that the expenses “do not provide benefits to ratepayers.”

- a) Please identify each expense item listed on Schedule 9.01 (page 2 of 2) that Ms. Pearce considers does “not provide benefits to ratepayers. If it is Ms. Pearce’s contention that she believes each expense item identified on Schedule 9.01 (page 2 of 2) does “not provide benefits to ratepayers,” please confirm. If conversely Ms. Pearce does not believe any of the expenses listed are “not provide benefits to ratepayers,” please confirm.

Response: See Response to AIC-Staff 12 Series Attachment.

- b) For each specific expense identified by Ms. Pearce as “not provid[ing] benefits to ratepayers” in response to [No. 6a], please provide the specific basis for Ms. Pearce’s opinion.

Response:

See Response to AIC-Staff 12 Series Attachment. No quantifiable ratepayer benefit was indicated in the support provided by AIC in response to discovery.

- c) For each specific expense identified by Ms. Pearce as “not provid[ing] benefits to ratepayers” in response to [No. 6a], please identify the subset of “most” of the expenses that also “appear to benefit employees in the form of perquisites for attending a meeting, or recognition of a special occasion or enhancements to the work environment that are in addition to the adequate compensation the employees receive for performing their work,” and provide the basis for Ms. Pearce’s opinion.

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Response:

Please see Response to AIC-Staff 12 Series Attachment. It is readily apparent that snacks, meals, floral arrangements and entertainment provided to the employees provide those employees with benefits. However, no quantifiable **ratepayer** benefit was indicated in the support provided by AIC in response to discovery.

- d) In responding to [No. 6c], please provide Ms. Pearce's definition of "perquisites," "enhancements to the work environment, and "adequate compensation."

Response:

The American Heritage Dictionary (Second College Edition) provides one definition of a perquisite as follows: "a payment or profit received in addition to a regular wage or salary". Another definition is "a tip or gratuity". Ms. Pearce used the term 'perquisites' to designate the cost of items provided to employees that are gratuitous, meaning unwarranted; unjustified, or unnecessary. The American Heritage Dictionary (Second College Edition) defines 'enhance' as follows: "To increase or make greater, as in value, beauty, or reputation; augment." Accordingly, Ms. Pearce used the term 'enhancements to the work environment' to designate the cost of items that make the workplace more enjoyable, but are neither necessary for the performance of service nor have they been shown to provide greater efficiencies. The American Heritage Dictionary (Second College Edition) provides one definition of 'adequate' as: "able to satisfy a requirement; suitable." Accordingly, Ms. Pearce used the term 'adequate compensation' to mean that even without the items she proposes to disallow, the Company's employees would not be undercompensated.

- e) Is it Ms. Pearce's contention that creating a positive workplace environment does not provide benefits to ratepayers? If Ms. Pearce's answer is anything other than an unqualified no, please explain the basis for her response.  
If Ms. Pearce's answer is no, please explain how in Ms. Pearce's opinion, each specific expense identified in [No. 6c] does not create a positive workplace environment.

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Response:

The Company has provided no measure of the impact the disputed costs have on the creation of a positive workplace environment, nor has any measure of ratepayer benefit from said positive workplace environment been quantified by the Company. Therefore, AIC's assertions that gratuitous items and events [such as snacks, meals, entertainment, flowers and parties] create a positive workplace environment which results in ratepayer benefits are unsupported.

- f) Is it Ms. Pearce's contention that boosting employee morale does not provide benefits to ratepayers?

If Ms. Pearce's answer is anything other than an unqualified no, please explain the basis for her response. If Ms. Pearce's answer is no, please explain how, in Ms. Pearce's opinion, each specific expense identified in [No. 6c] does not boost workplace morale.

Response:

The Company has provided no measure of the impact the disputed costs have on the creation of a positive workplace environment, nor has any measure of ratepayer benefit from said positive workplace environment been quantified by the Company. Therefore, AIC's assertions that gratuitous items and events [such as snacks, meals, entertainment, flowers and parties] create a positive workplace environment which results in ratepayer benefits are unsupported.

- g) Is it Ms. Pearce's contention that improving workplace productivity does not provide benefits to ratepayers? If Ms. Pearce's answer is anything other than an unqualified no, please explain the basis for her response.

If Ms. Pearce's answer is no, please explain how, in Ms. Pearce's opinion, each specific expenses identified in [No. 6c] does not improve workplace productivity.

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Response:

The Company has provided no measure of the impact the disputed costs have on the creation of a positive workplace environment, nor has any measure of ratepayer benefit from said positive workplace environment been quantified by the Company. Therefore, AIC's assertions that gratuitous items and events [such as snacks, meals, entertainment, flowers and parties] create a positive workplace environment which results in ratepayer benefits are unsupported.

h) Please confirm that Ms. Pearce believes the following expenses identified in Schedule 9.01 (Page 2 of 2) do not create a positive work environment, boost employee morale and/or improve workplace productivity.

In responding, please provide the basis for Ms. Pearce's opinion as to each expense listed.

- i) Flowers for an employee funeral (line 3) (\$110.75
- ii) Flowers for an employee farewell (line 4) (\$64.38)
- iii) Snacks for First Friday Safety meeting (line 11) (\$24.67)
- iv) Donuts (line 27) (\$16.30)
- v) Cake for an employee anniversary (line 33) (\$41.81)
- vi) Refreshments VPQ meeting (line 63) (\$82.56)
- vii) Cupcakes for Exec Staff (line 83) (\$34.57)
- viii) Decorations for Retirement Celebration (line 88) (\$17.56
- ix) Belleville Appreciation Breakfast for employees on Tax project (line 92) (\$40.69

Response:

The Company has provided no measure of the impact the disputed costs have on the creation of a positive workplace environment, nor has any measure of ratepayer benefit from said positive workplace environment been quantified by the Company. Therefore, AIC's assertions that gratuitous items and events [such as snacks, meals, entertainment, flowers and parties] create a positive workplace environment which

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results in ratepayer benefits are unsupported. See Response to AIC-Staff 12 Series Attachment.

- i) On line 27 of Schedule 9.01 (page 2 of 2), Ms. Pearce disallows \$16.30 for "Donuts." Please indicate what Ms. Pearce considers to be the minimum dollar amount on utility employee credit card charges that she believes requires investigation by ICC Staff as to the business justification of the purchase. If Ms. Pearce does not believe there is a minimum dollar amount for inquiry, please confirm.

Response:

Any amount of purchase paid for with ratepayer funding is subject to review for reasonableness of the amount and the reasonableness of the type of expense, since the Company is guaranteed dollar for dollar recovery of all costs through the reconciliation adjustment.

- j) Regarding her disallowance for "Donuts," on line 27 of Schedule 9.01 (page 2 of 2), is it Ms. Pearce's contention that utility rates should not contain any costs of donuts and other snacks purchased for employee meetings and celebrations? Please provide the basis for her answer, and identify any prior ICC orders that approved a similar adjustment.

Response:

Yes that is Ms. Pearce's contention. Note that the response to AIC-Staff 12.01 cites to the Order in Docket No. 12-0293.

- k) Regarding her disallowance for "flowers" for an employee funeral and an employee farewell on lines 3-4 of Schedule 9.01 (page 2 of 2), is it Ms. Pearce's contention that utility rates should not contain any costs of flowers for employee funerals and farewells? Please provide the basis for her answer, and identify any prior ICC orders that approved a similar adjustment. Provide the basis for her answer.

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Response:

Please see the response to 12.06(j) above.

- l) Regarding her various disallowances for food and beverage for employee "retirements," "appreciation," and "anniversaries," is it Ms. Pearce's contention that utility rates should not contain any costs of food and beverages for employee "retirements," "appreciation," and "anniversaries"? Please provide the basis for her answer, and identify any prior ICC orders that approved a similar adjustment.

Response:

Please see the response to 12.06(j) above.

- m) Regarding her disallowances for pens, travel mugs, coffee mugs and coasters for new employee packets is it Ms. Pearce's contention that utility rates should not contain any costs of such items given to new employees?. Please provide the basis for her answer, and identify any prior ICC orders that approved a similar adjustment.

Response:

Please see the response to 12.06(j) above.

- n) Regarding her disallowances for "volunteer" gift cards, is it Ms. Pearce's contention that utility rates should not contain any costs of "volunteer" gift cards? Yes, that is Ms. Pearce's contention. Please provide the basis for her answer, and identify any prior ICC orders that approved a similar adjustment.

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Response:

Please see the response to 12.06(j) above.

- o) Regarding Ms. Pearce's comment of "possible alcohol" on lines 105 and 106 on Schedule 9.01, please identify the basis for the comment.

Response:

Upon further review of the response to BAP 20.01, Attach 64, Ms. Pearce finds no indication that alcohol was purchased with these meals. This reference will be removed in Ms. Pearce's rebuttal schedules.

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Request AIC-Staff 12.07:

In her direct testimony (ICC Staff Ex. 9.0, lines 75-91), Ms. Pearce provides a threefold rationale for her disallowance of employee credit card charges. This data request concerns her third rationale on lines 84-91 that “expenses recovered from ratepayers should meet a higher standard because the customers require the service provided by the Company and have no alternative but to use AIC for delivery of their gas service.”

- a) Please provide Ms. Pearce’s definition of the “higher standard.”
- b) Please identify each expense item listed on Schedule 9.01 (page 2 of 2) that Ms. Pearce believes does not meet the “higher standard” defined in response to [No. 7a]. If it is Ms. Pearce’s contention that she believes each expense item identified on Schedule 9.01 (page 2 of 2) does not meet the “higher standard,” please confirm.

Response:

Ms. Pearce considered Docket No. 12-0293, Final Order dated December 5, 2012, at 69, specifically:

To the extent that AIC feels that its current P-Card policies are consistent with **general corporate standards, the Commission reminds AIC that such a comparison is not appropriate** when the corporate entity in question simply passes purchasing card expenses on to its captive customers. **(emphasis added)**

While Ms. Pearce is not an attorney, Ms. Pearce infers from the above statement that the Commission does not believe “general corporate standards” are appropriate in the evaluation of purchasing card expenses that are to be recovered from ratepayers. Given that general corporate standards are not appropriate, Ms. Pearce infers the Commission expects a higher standard for those expenses that are to be recovered from ratepayers. Ms. Pearce understands that recoverable expenses must meet the criteria outlined in her direct testimony, ICC Staff Exhibit 9.0, p. 4, lines 75-91, in order to meet the “higher standard” described by the Commission in Docket No. 12-0293.

Response to AIC's  
Twelfth Set of Data Requests to Staff  
AIC-Staff 12.01 – 12.08  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 26, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

Request AIC-Staff 12.08:

On page 3 of her direct (line 46), Ms. Pearce quotes what she believes to be “the underlying premise” of the credit card disallowances in ICC Docket No. 12-0293.

- a) In ICC Docket No. 12-0293, the Commission required AIC “to submit for approval its internal controls on P-Card usage within 45 days of the entry of [its] Order.” Given the existence of that pending docketed proceeding, in which Commission Staff is actively participating, please indicate why inquiries regarding AIC’s corporate credit card charges are not premature pending the completion of Staff and the Commission’s review of internal controls in ICC Docket No. 13-0075.

Response:

Staff objects to this request to the extent that it calls for a legal conclusion. Notwithstanding, and without waiving this objection, Ms. Pearce states: Ms. Pearce does not agree that an adjustment to credit card charges in this case is premature. While Ms. Pearce is not an attorney, similar to cases that have occurred during the pendency of a rulemaking, the Commission indicates that regardless of a rulemaking, the Commission states that a decision must be made using the rules and the evidence in place at the time of the decision. As stated by the Commission in Docket No. 12-0511/12-0512: “However, this rulemaking has not been completed, thus the Commission must resolve this issue based on the current law as it stands today”. Ms. Pearce agrees with the Commission and has reviewed the 2012 credit card charges presented in this case as the basis for the 2014 forecast and has adjusted them based on the documentation and explanations provided by AIC.

- b) In response to Ms. Pearce’s data requests in this docket and in ICC Docket No. 13-0301, AIC has produced documentation on the accounting policies and procedures that AIC has in place regarding the use of employee credit cards and the reporting of employee credit card expenses. Did Ms. Pearce consider the documentation of AIC’s accounting policies and procedures regarding the use of employee credit cards and the reporting of employee credit card expenses in making her adjustment? If so, identify with specificity the documentation she considered and

Response to AIC's  
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ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

explain how such documentation factored into her adjustment. If not, please indicate why consideration of such documentation was not necessary to support Staff's adjustment.

Response:

To the extent the expenses occurred during the time the revised procedures were in effect, Ms. Pearce took the policies and procedures into consideration. However, Ms. Pearce evaluated the 2012 expenses according to her understanding of the criteria described in the Order in Docket No. 12-0293.

c) Is it Staff's intention to review employee credit card charges in each annual update to AIC's electric formula rates as well as traditional Article IX proceedings for increases to AIC's natural gas rates?

Response:

Staff objects to this request on the grounds that it calls for speculation and seeks information that is not relevant, material or likely to lead to admissible evidence in this proceeding. Ms. Pearce is unable to speculate as to the intentions of Staff witnesses with respect to review of employee credit card charges in future annual updates to AIC's electric formula rates and future Article IX proceedings for increases to AIC's natural gas rates.

d) The methodology and scope of Staff's inquiry on credit card charges in this docket and in ICC Docket No. 13-0301 differs from the methodology and scope of Staff's inquiry in ICC Docket No. 12-0293. Does Staff agree the methodology and scope of its inquiry on credit card charges should be similar and consistent in future rate proceedings?

Response to AIC's  
Twelfth Set of Data Requests to Staff  
AIC-Staff 12.01 – 12.08  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: July 26, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

Response:

Staff objects to this request on the grounds that it calls for speculation and seeks information that is not relevant, material or likely to lead to admissible evidence in this proceeding. Ms. Pearce is unable to speculate as to the methodology and scope of inquiry of Staff witnesses with respect to credit card charges in future rate proceedings.

- e) Please provide Staff's detailed proposed methodology and scope of inquiry on credit card charges in future rate proceedings, and explain why the approach proposed is reasonable in both methodology and scope.

Response:

Staff objects to this request on the grounds that it calls for speculation and seeks information that is not relevant, material or likely to lead to admissible evidence in this proceeding. Ms. Pearce is unable to speculate as to the methodology and scope of inquiry of Staff witnesses with respect to credit card charges in future rate proceedings.

Response to AIC-Staff DR 12 Series Attachment  
 Docket No. 13-0192  
 ICC Staff Exhibit 9.0  
 Schedule 9.01  
 Page 2 of 2

Analysis of AIC Corporate Credit Card (Formerly "P-Card") Charges  
 2012 Actual Amounts  
 (In Whole Dollars)

Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
1	Attach 01	208686		\$ -						
2	Attach 02	242232		-						
3	Attach 03	248408	flowers for employee funeral	110.75		x	x	x	x	
4	Attach 03		employee farewell	64.38	TLF Blossom Basket Florist	x	x	x	x	x
5	Attach 04	257270		-						
6	Attach 05	274273	105 Ameren pens w Ameren Illinois logo	194.75	Jedco Sales	x	x	x	x	x
7	Attach 06	280249	72 travel cups for new employee packets & kudos	420.13	Jedco Sales	x	x	x	x	x
8	Attach 06		73 coffee mugs for new employee packets & kudos	682.20	Jedco Sales	x	x	x	x	x
9	Attach 06		100 sandstone coasters for Div 4' s new employee packets & kudos- 50 gift boxes	485.73	Jedco Sales	x	x	x	x	x
10	Attach 07	209157	2 logo T-shirts, 1 hoodie	181.66	this total includes the 1% discount	x	x	x	x	x
11	Attach 08	240304	snacks for first Friday	24.67	Casey's - candy & nuts	x	x	x	x	x
12	Attach 09	246252		-						
13	Attach 09			-						
14	Attach 09		snacks for first Friday	33.84	Walmart	x	x	x	x	x
15	Attach 10	256907		-						
16	Attach 11	275316	snacks for first Friday	35.00	Mister Donut	x	x	x	x	x
17	Attach 11		snacks for first Friday	10.73	Walmart	x	x	x	x	x
18	Attach 12	205779	safety meeting	254.71	Little White Cottage Catering	x	x	x	x	x
19	Attach 12		safety leadership luncheon	702.99	Little White Cottage Catering	x	x	x	x	x
20	Attach 12		cellphone-Andy Stolp	85.39	Wireless Central - Kewanee					x
21	Attach 13	213711	"meeting room supplies"	101.73	HyVee-snacks	x	x	x	x	x
22	Attach 14	209453		-						
23	Attach 15	234016	cell phone _____	66.85			x	x	x	x
24	Attach 15			-						
25	Attach 15		_____ service anniversary lunch	89.35		x	x	x	x	x
26	Attach 16	240348		-						
27	Attach 17	248596	Donuts	16.30	Walmart	x	x			
28	Attach 18	263169	new cell phone	68.06						
29	Attach 18		safety committee meeting meals	254.66	Little White Cottage Catering	x	x	x	x	x
30	Attach 18		cell phone for _____ - no receipt available	85.39	Wireless Central - Kewanee		x	x	x	x
31	Attach 19	263971	Wireless purchase	245.51	Wireless Central - Kewanee		x	x	x	x
32	Attach 20	276967	Anniversary Cake/Coffee	14.91	Walmart	x	x	x	x	x
33	Attach 21	276993	Anniversary Cake	41.81		x	x	x	x	x
34	Attach 22	215069	Snacks for First Friday	25.29	Schnucks 2 fruit trays	x	x	x	x	x
35	Attach 23	240310	Snacks for First Friday Safety	24.03	Casey's pizza	x	x	x	x	x
36	Attach 24	256913	Snacks for First Friday Safety	48.04		x	x	x	x	x
37	Attach 25	275328	Junior Achievement Lunch	84.81	Ameren Executive Dining	x	x	x	x	x
38	Attach 26	208782	"Logistics" mtg	13.30	Walmart-candy	x	x	x	x	x
39	Attach 27	241079		-						
40	Attach 28	254469	Hotel Rm 1 night	189.28	Embassy Suites		x	x	x	x
41	Attach 29	256509		-						
42	Attach 30	259690	"Finance Charge" on Cas Advance	30.00		x	x	x	x	x
43	Attach 31	274115		-						
44	Attach 32	206997	TV for Champaign Storm Rm	489.35		x	x	x	x	x
45	Attach 33	213351	Yr End Safety Celebration	171.89	Stadium Grill	x	x	x	x	x
46	Attach 34	238421	Holster & Car Charger for _____	54.47			x	x	x	x

Response to AIC-Staff DR 12 Series Attachment  
 Docket No. 13-0192  
 ICC Staff Exhibit 9.0  
 Schedule 9.01  
 Page 2 of 2

Analysis of AIC Corporate Credit Card (Formerly "P-Card") Charges  
 2012 Actual Amounts  
 (In Whole Dollars)

Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
47	Attach 34		Blackberry for _____	68.06			x		x	x
48	Attach 34		Blackberry Holster for _____	33.96			x		x	x
49	Attach 35	245003	Safety Recognition Breakfast	127.36		x	x		x	x
50	Attach 36	255233	Blackberry for _____	212.49			x		x	x
51	Attach 37	266408	Blackberry for _____	52.80			x		x	x
52	Attach 38	217089		-						
53	Attach 39	277194		-						
54	Attach 40	242379		-						
55	Attach 41	275967	Employee appreciation	197.99		x	x		x	x
56	Attach 41		Employee appreciation	146.93		x	x		x	x
57	Attach 42	207528		-						
58	Attach 43	211764	Volunteer Gift Card	105.44		x	x		x	
59	Attach 43		Volunteer Gift Card	28.44		x	x		x	
60	Attach 43		Volunteer Gift Card	53.94		x	x		x	
61	Attach 44	245399		-						
62	Attach 45	254110	Strtching Gift Cards & Slide Advancer	275.56		x	x		x	x
63	Attach 46	256068	Refreshments VPQ meeting	82.56		x	x		x	x
64	Attach 46		Refreshments VPQ meeting	44.69		x	x		x	x
65	Attach 46		Dinner-HR Partner meeting	36.00		x	x		x	x
66	Attach 47	269872	Balance for Christmas Luncheon	16.34		x	x		x	x
67	Attach 48	216746	LCD TV	377.11	Sherman's Place	x	x		x	x
68	Attach 48		Safety lunch	70.35	O'Charley's	x	x		x	x
69	Attach 48		DVD player	86.19	Best Buy	x	x		x	x
70	Attach 49	242095	Safety Brkfst Meeting	90.59	Cracker Barrel	x	x		x	x
71	Attach 49		Logistics Team	62.05	Cheddars Casual Café	x	x		x	x
72	Attach 49		_____ Service Anniversary Lunch	101.91	Main Place Bar & Grill	x	x		x	x
73	Attach 50	257756	United Way mtg	35.00	Denny's Doughnuts & Bakery	x	x		x	x
74	Attach 50		_____ 25th Service Anniv	550.51	Smokey Bones	x	x		x	x
75	Attach 51	276812	McLean County Chamber Dues	701.00		x	x		x	
76	Attach 51		"Logistics"	27.50	at McFurray' Golf and Grill	x	x		x	x
77	Attach 51		Adopt a Family committee	77.50			x		x	
78	Attach 52	261453	Flat Screen TV	996.80		x	x		x	x
79	Attach 52		Lunch meeting with _____	33.53		x	x		x	x
80	Attach 52		Blackberry Case & Car charger	75.85			x		x	x
81	Attach 52		Bluetooth	60.53			x		x	x
82	Attach 53	275857		-						
83	Attach 53		Meeting with _____ - Cupcakes for Exec Staff	34.57		x	x		x	x
84	Attach 54	240869		-						
85	Attach 55	245127		-						
86	Attach 56	273838		-						
87	Attach 57	207675		-						
88	Attach 58	216027	Decorations for Retirement Celebration	17.56		x	x		x	x
89	Attach 58		Lunch/Refreshments for Retirement Celebration	42.46		x	x		x	x
90	Attach 58		Lunch/Refreshments for Retirement Celebration	115.24		x	x		x	x
91	Attach 59	238842		-						
92	Attach 59		Belleville Appreciation Breakfast for employees on Tax project	40.69		x	x		x	x

Analysis of AIC Corporate Credit Card (Formerly "P-Card") Charges  
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Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
93	Attach 60	261424	Flat Screen TV for ESTL OC Digital Cameras, USBs, Discs & Rechargabel batteries	498.40		x	x	x	x	x
94	Attach 60			657.59		x				
95	Attach 60		Safety lunch	274.41		x	x	x	x	x
96	Attach 60		Direct TV hardware	75.06		x	x	x	x	x
97	Attach 60			-						
98	Attach 61	264301		-						
99	Attach 61		Monthly Svc for ESTL office	82.98	Direct TV	x	x	x	x	x
100	Attach 61		Drinks for _____ and Lawyers	24.65		x	x	x	x	
101	Attach 61		Lunch for _____ and Lawyers	128.69		x	x	x	x	
102	Attach 62	273243	Direct TV	34.99		x	x	x	x	x
103	Attach 62		ESTL Cable	34.99		x	x	x	x	x
104	Attach 63	275859	Storm	-						
105	Attach 64	279039	Retirement Lunch	405.61	meals-possible alcohol-plus 18% gratuity	x	x	x	x	x
106	Attach 64		Safety Breakfast	93.46	meals-possible alcohol-plus 18% gratuity	x	x	x	x	x
107	Attach 64		Safety Breakfast	15.00		x	x	x	x	x
108	Staff Disallowance based on four months' expenses			\$ 12,807.29						
109	Multiplier to annualize estimate			3						
110	Staff Disallowance based on twelve months' expenses			\$ 38,421.87						
111	Gas Portion - Based on Direct Labor With Admin & General			31.04%	AIC Schedule A-5b, line 7					
112	Electric Portion - Based on Direct Labor With Admin & General			68.96%	AIC Schedule A-5b, line 7					
113	Disallowance for Gas Service			\$ 11,926.15						
114	Disallowance for Electric Service			26,495.72						
115	Total Disallowed Expenses - Gas and Electric			\$ 38,421.87						

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Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
1	Attach 01	208686		\$ -						
2	Attach 02	242232		-						
3	Attach 03	248408	flowers for employee funeral	110.75		x	x	x	x	
4	Attach 03		employee farewell	64.38	TLF Blossom Basket Florist	x	x	x	x	x
5	Attach 04	257270		-						
6	Attach 05	274273	105 Ameren pens w Ameren Illinois logo	194.75	Jedco Sales	x	x	x	x	x
7	Attach 06	280249	72 travel cups for new employee packets & kudos	420.13	Jedco Sales	x	x	x	x	x
8	Attach 06		73 coffee mugs for new employee packets & kudos	682.20	Jedco Sales	x	x	x	x	x
9	Attach 06		100 sandstone coasters for Div 4' s new employee packets & kudos- 50 gift boxes	485.73	Jedco Sales	x	x	x	x	x
10	Attach 07	209157	2 logo T-shirts, 1 hoodie	181.66	this total includes the 1% discount	x	x	x	x	x
11	Attach 08	240304	snacks for first Friday	24.67	Casey's - candy & nuts	x	x	x	x	x
12	Attach 09	246252		-						
13	Attach 09			-						
14	Attach 09		snacks for first Friday	33.84	Walmart	x	x	x	x	x
15	Attach 10	256907		-						
16	Attach 11	275316	snacks for first Friday	35.00	Mister Donut	x	x	x	x	x
17	Attach 11		snacks for first Friday	10.73	Walmart	x	x	x	x	x
18	Attach 12	205779	safety meeting	254.71	Little White Cottage Catering	x	x	x	x	x
19	Attach 12		safety leadership luncheon	702.99	Little White Cottage Catering	x	x	x	x	x
20	Attach 12		cellphone-Andy Stolp	85.39	Wireless Central - Kewanee					x
21	Attach 13	213711	"meeting room supplies"	101.73	HyVee-snacks	x	x	x	x	x
22	Attach 14	209453		-						
23	Attach 15	234016	cell phone _____	66.85			x	x	x	x
24	Attach 15			-						
25	Attach 15		_____ service anniversary lunch	89.35		x	x	x	x	x
26	Attach 16	240348		-						
27	Attach 17	248596	Donuts	16.30	Walmart	x	x			
28	Attach 18	263169	new cell phone	68.06						
29	Attach 18		safety committee meeting meals	254.66	Little White Cottage Catering	x	x	x	x	x
30	Attach 18		cell phone for _____ - no receipt available	85.39	Wireless Central - Kewanee		x	x	x	x
31	Attach 19	263971	Wireless purchase	245.51	Wireless Central - Kewanee		x	x	x	x
32	Attach 20	276967	Anniversary Cake/Coffee	14.91	Walmart	x	x	x	x	x
33	Attach 21	276993	Anniversary Cake	41.81		x	x	x	x	x
34	Attach 22	215069	Snacks for First Friday	25.29	Schnucks 2 fruit trays	x	x	x	x	x
35	Attach 23	240310	Snacks for First Friday Safety	24.03	Casey's pizza	x	x	x	x	x
36	Attach 24	256913	Snacks for First Friday Safety	48.04		x	x	x	x	x
37	Attach 25	275328	Junior Achievement Lunch	84.81	Ameren Executive Dining	x	x	x	x	x
38	Attach 26	208782	"Logistics" mtg	13.30	Walmart-candy	x	x	x	x	x
39	Attach 27	241079		-						
40	Attach 28	254469	Hotel Rm 1 night	189.28	Embassy Suites		x	x	x	x
41	Attach 29	256509		-						
42	Attach 30	259690	"Finance Charge" on Cas Advance	30.00		x	x	x	x	x
43	Attach 31	274115		-						
44	Attach 32	206997	TV for Champaign Storm Rm	489.35		x	x	x	x	x
45	Attach 33	213351	Yr End Safety Celebration	171.89	Stadium Grill	x	x	x	x	x
46	Attach 34	238421	Holster & Car Charger for _____	54.47			x	x	x	x

Analysis of AIC Corporate Credit Card (Formerly "P-Card") Charges  
2012 Actual Amounts  
(In Whole Dollars)

Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
47	Attach 34		Blackberry for _____	68.06			x		x	x
48	Attach 34		Blackberry Holster for _____	33.96			x		x	x
49	Attach 35	245003	Safety Recognition Breakfast	127.36		x	x		x	x
50	Attach 36	255233	Blackberry for _____	212.49			x		x	x
51	Attach 37	266408	Blackberry for _____	52.80			x		x	x
52	Attach 38	217089		-						
53	Attach 39	277194		-						
54	Attach 40	242379		-						
55	Attach 41	275967	Employee appreciation	197.99		x	x		x	x
56	Attach 41		Employee appreciation	146.93		x	x		x	x
57	Attach 42	207528		-						
58	Attach 43	211764	Volunteer Gift Card	105.44		x	x		x	
59	Attach 43		Volunteer Gift Card	28.44		x	x		x	
60	Attach 43		Volunteer Gift Card	53.94		x	x		x	
61	Attach 44	245399		-						
62	Attach 45	254110	Strtching Gift Cards & Slide Advancer	275.56		x	x		x	x
63	Attach 46	256068	Refreshments VPQ meeting	82.56		x	x		x	x
64	Attach 46		Refreshments VPQ meeting	44.69		x	x		x	x
65	Attach 46		Dinner-HR Partner meeting	36.00		x	x		x	x
66	Attach 47	269872	Balance for Christmas Luncheon	16.34		x	x		x	x
67	Attach 48	216746	LCD TV	377.11	Sherman's Place	x	x		x	x
68	Attach 48		Safety lunch	70.35	O'Charley's	x	x		x	x
69	Attach 48		DVD player	86.19	Best Buy	x	x		x	x
70	Attach 49	242095	Safety Brkfst Meeting	90.59	Cracker Barrel	x	x		x	x
71	Attach 49		Logistics Team	62.05	Cheddars Casual Café	x	x		x	x
72	Attach 49		_____ Service Anniversary Lunch	101.91	Main Place Bar & Grill	x	x		x	x
73	Attach 50	257756	United Way mtg	35.00	Denny's Doughnuts & Bakery	x	x		x	x
74	Attach 50		_____25th Service Anniv	550.51	Smokey Bones	x	x		x	x
75	Attach 51	276812	McLean County Chamber Dues	701.00		x	x		x	
76	Attach 51		"Logistics"	27.50	at McForray' Golf and Grill	x	x		x	x
77	Attach 51		Adopt a Family committee	77.50			x		x	
78	Attach 52	261453	Flat Screen TV	996.80		x	x		x	x
79	Attach 52		Lunch meeting with _____	33.53		x	x		x	x
80	Attach 52		Blackberry Case & Car charger	75.85			x		x	x
81	Attach 52		Bluetooth	60.53			x		x	x
82	Attach 53	275857		-						
83	Attach 53		Meeting with _____ - Cupcakes for Exec Staff	34.57		x	x		x	x
84	Attach 54	240869		-						
85	Attach 55	245127		-						
86	Attach 56	273838		-						
87	Attach 57	207675		-						
88	Attach 58	216027	Decorations for Retirement Celebration	17.56		x	x		x	x
89	Attach 58		Lunch/Refreshments for Retirement Celebration	42.46		x	x		x	x
90	Attach 58		Lunch/Refreshments for Retirement Celebration	115.24		x	x		x	x
91	Attach 59	238842		-						
92	Attach 59		Belleville Appreciation Breakfast for employees on Tax project	40.69		x	x		x	x

Analysis of AIC Corporate Credit Card (Formerly "P-Card") Charges  
2012 Actual Amounts  
(In Whole Dollars)

Line No.	AIC Response to DR BAP 20.01	Expense Report	Explanation	Amount	Vendor/Notes	AIC-Staff 12.03	AIC-Staff 12.04	AIC-Staff 12.05	AIC-Staff 12.06 (a)	AIC-Staff 12.06 (c)
(a)	(b)	(c)	(d)	(e)	(f)	(g)	(h)	(i)	(j)	(k)
						Based on Docket No. 12-0293		Based on Ms. Pearce's Threefold Rationale		
						"Arguably Excessive"	Unnecessary for Delivery Service	Unnecessary for Provision of Utility Service	Does Not Provide Benefits to Ratepayers	Benefit AIC Employees as a Perquisite
93	Attach 60	261424	Flat Screen TV for ESTL OC Digital Cameras, USBs, Discs & Rechargabel	498.40		x	x	x	x	x
94	Attach 60		batteries	657.59		x				
95	Attach 60		Safety lunch	274.41		x	x	x	x	x
96	Attach 60		Direct TV hardware	75.06		x	x	x	x	x
97	Attach 60			-						
98	Attach 61	264301		-						
99	Attach 61		Monthly Svc for ESTL office	82.98	Direct TV	x	x	x	x	x
100	Attach 61		Drinks for _____ and Lawyers	24.65		x	x	x	x	
101	Attach 61		Lunch for _____ and Lawyers	128.69		x	x	x	x	
102	Attach 62	273243	Direct TV	34.99		x	x	x	x	x
103	Attach 62		ESTL Cable	34.99		x	x	x	x	x
104	Attach 63	275859	Storm	-						
105	Attach 64	279039	Retirement Lunch	405.61	meals-possible alcohol-plus 18% gratuity	x	x	x	x	x
106	Attach 64		Safety Breakfast	93.46	meals-possible alcohol-plus 18% gratuity	x	x	x	x	x
107	Attach 64		Safety Breakfast	15.00		x	x	x	x	x
108	Staff Disallowance based on four months' expenses			\$ 12,807.29						
109	Multiplier to annualize estimate			3						
110	Staff Disallowance based on twelve months' expenses			\$ 38,421.87						
111	Gas Portion - Based on Direct Labor With Admin & General			31.04%	AIC Schedule A-5b, line 7					
112	Electric Portion - Based on Direct Labor With Admin & General			68.96%	AIC Schedule A-5b, line 7					
113	Disallowance for Gas Service			\$ 11,926.15						
114	Disallowance for Electric Service			26,495.72						
115	Total Disallowed Expenses - Gas and Electric			\$ 38,421.87						

**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: 7/18/2013**

BAP 22.01

Referring to Ameren Exhibit 21.0, page 28, lines 599-603, please provide copies of the written work product that were provided by SIG to AIC in 2012. This should include, but not be limited to, advertising scripts, copies of print/TV/radio ads and communications from SIG to AIC demonstrating the consultation services performed by SIG.

**RESPONSE**

**Prepared By: Thomas B. Kennedy, III  
Title: Director, Communications & Public Relations  
Phone Number: (309) 677-5489**

No written work product was produced and provided by SIG to AIC in 2012.

Response to AIC's  
Second Set of Data Requests to Staff  
AIC-Staff 5.01 – 5.16  
Docket No. 13-0192  
Response of Staff Witness Bonita A. Pearce  
Response Date: June 26, 2013

ICC Person Responsible: Bonita A. Pearce  
Title: Accountant  
Business Address: Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701  
Phone Number: 217-785-5441

**AIC-Staff 5.04** In Ms. Pearce's opinion, when is it appropriate for the Commission to adjust a forecasted operating expense based on the most recent calendar year of actual data adjusted for inflation?

Response:

Ms. Pearce thinks it is appropriate to adjust a forecasted operating expense based on the most recent calendar year of actual data adjusted for inflation when the projection of the operating expense for the future year appears to be unreasonable when compared to the company's actual history of an expense.