

**BEFORE THE ILLINOIS COMMERCE COMMISSION
STATE OF ILLINOIS**

AMEREN ILLINOIS COMPANY)	
d/b/a Ameren Illinois)	
)	ICC Docket No. 13-0192
Proposed general increase in gas)	
delivery service rates)	

**RESPONSE OF THE RETAIL GAS SUPPLIERS
TO THE CITIZENS UTILITY BOARD'S MOTION
TO STRIKE CERTAIN REBUTTAL TESTIMONY OF RGS WITNESS CRIST**

EXHIBIT A

1.01 Regarding the SVT Workshops (CUB Exh. 1.0, L. 61), please list the CUB employees or consultants that participated in the workshops. List each date of participation and identify if they participated in person or through the conference call.

RESPONSE:

Julie Soderna participated in several workshops via telephone, but did not maintain records of the dates of participation.

1.02 Regarding the SVT Workshops (CUB Exh. 1.0, L. 61), please provide copies of any list of issues, concerns, or problems related to consumer protection presented at the SVT Workshops by CUB employees or consultants.

RESPONSE:

As demonstrated in Ameren Ex. 2.2, the issue of consumer protections was never placed on the agenda in the Staff-led workshop process; therefore, there was no appropriate venue in which to discuss consumer protections, despite the Commission's clear directive in its Order in Docket No. 11-0282 that such items be addressed.

1.03 Regarding the SVT Workshops (CUB Exh. 1.0, L. 61), please provide copies of any consumer protection proposals presented by CUB employees or consultants at the SVT Workshops. Such proposals can be in the form of proposed tariffs, rules and regulations or any other document providing suggested consumer protections.

RESPONSE:

See CUB's response to RGS 1.02.

**Citizens Utility Board's
Response to ICEA-RESA 1st DR
Docket No. 13-0192
Data Request Response Date: July 11, 2013**

ICEA/RESA CUB 1.02

On pages 74-75 of his Direct Testimony, Mr. Cohen states that the issue of consumer protection is a critical issue that must be addressed before proceeding with a small volume transportation program. With respect to Mr. Cohen's statement, is it CUB's position that the issue of consumer protection was not considered in the workshops referenced on pages 3-4 of Mr. Cohen's Direct Testimony? Did CUB propose any consumer protections as part of the workshop process? If not, why not?

Response:

Mr. Cohen did not participate in the 2012 Ameren SVT workshops.

CUB responds that the issue of consumer protections was not considered in the workshops. CUB did not propose consumer protections because none of the Staff-led agendas included the topic of consumer protections, nor were the following issues discussed, as directed by the Commission's Order in Docket No. 11-0282 at page 194:

- whether there would be any benefit to customers from such a program;
- whether the costs of implementing such a program would be reasonable;
- whether there is utility support for the competitive market;
- will there be full utility cost recovery for the utility; and
- a properly adjusted price-to-compare

CUB anticipated a separate workshop to discuss consumer protections and the issues identified above, as mandated by the Commission's Order in Docket No. 11-0282, before the completion of the workshop process.

**Citizens Utility Board's
Response to ICEA-RESA 2nd DR
Docket No. 13-0192
Data Request Response Date: July 25, 2013**

ICEA/RESA CUB 2.01

This is a follow-up request to CUB's response to ICEA/RESA DR CUB 1.02: Please indicate which of the following SVT workshops were attended (either in person or on the phone) by representatives of CUB and identify those representatives for each such workshop: March 8, 2012; April 5, 2012; May 8, 2012; and June 21, 2012.

Response:

CUB objects to this data request as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. The agreement of all parties in the workshops was that the exchanges in the workshop process are to be treated confidentially. Furthermore, an important aspect of workshops is the ability for stakeholders to freely discuss issues under consideration without being held to a particular position in a docketed proceeding or in public. Notwithstanding the objections, Julie Soderna called into the March 8, 2012 and May 8, 2012 workshops, and is not certain about the April 5, 2012, and June 21, 2012 workshops.

**Citizens Utility Board's
Response to ICEA-RESA 2nd DR
Docket No. 13-0192
Data Request Response Date: July 25, 2013**

ICEA/RESA CUB 2.02

This is a follow-up request to CUB's response to ICEA/RESA DR CUB 1.02: Please indicate which of the following SVT webinars were attended by representatives of CUB and identify those representatives for each such webinar: August 23, 2012; August 29, 2012; September 5, 2012; and September 10, 2012.

Response:

CUB objects to this data request as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. The agreement of all parties in the workshops was that the exchanges in the workshop process are to be treated confidentially. Furthermore, an important aspect of workshops is the ability for stakeholders to freely discuss issues under consideration without being held to a particular position in a docketed proceeding or in public. Notwithstanding the objections, Julie Soderna does not recall whether she participated in the webinars.

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Response to ICEA-RESA 2nd DR
Docket No. 13-0192
Data Request Response Date: July 25, 2013**

ICEA/RESA CUB 2.03:

This is a follow-up request to CUB's response to ICEA/RESA DR CUB 1.02. Does CUB agree that the issue of what consumer protections are needed was the first agenda item for the first SVT workshop, March 8, 2012?

Response:

CUB objects to this data request as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. The agreement of all parties in the workshops was that the exchanges in the workshop process are to be treated confidentially. Furthermore, an important aspect of workshops is the ability for stakeholders to freely discuss issues under consideration without being held to a particular position in a docketed proceeding or in public. Subject to and notwithstanding this objection, see CUB's response to ICEA-RESA CUB 1.02.

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Docket No. 13-0192
Data Request Response Date: July 25, 2013**

ICEA/RESA CUB 2.04

This is a follow-up request to CUB's response to ICEA/RESA DR CUB 1.02: Did CUB request a separate SVT workshop to discuss consumer protections?

Response:

CUB objects to this data request as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. The agreement of all parties in the workshops was that the exchanges in the workshop process are to be treated confidentially. Furthermore, an important aspect of workshops is the ability for stakeholders to freely discuss issues under consideration without being held to a particular position in a docketed proceeding or in public. Subject to and notwithstanding this objection, see CUB's response to ICEA-RESA CUB 1.02.

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Response to ICEA-RESA 2nd DR
Docket No. 13-0192
Data Request Response Date: July 25, 2013**

ICEA/RESA CUB 2.05

This is a follow-up request to CUB's response to ICEA/RESA DR CUB 1.02: Is it CUB's position that it was precluded from addressing the issue of consumer protections at the SVT workshops? If so, please explain fully the basis for this position.

Response:

CUB objects to this data request as seeking information that is not reasonably calculated to lead to the discovery of admissible evidence. The agreement of all parties in the workshops was that the exchanges in the workshop process are to be treated confidentially. Furthermore, an important aspect of workshops is the ability for stakeholders to freely discuss issues under consideration without being held to a particular position in a docketed proceeding or in public. Subject to and notwithstanding this objection, see CUB's response to ICEA-RESA CUB 1.02.