

Response to AIC's
First Set of Data Requests to Staff
AIC-Staff 1.01 – 1.36
Docket No. 13-0501/13-0517 (Cons.)
Response of Staff Witness Theresa Ebrey
Response Date: 10/21/2013

Ameren Exhibit 6.1
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ICC Person Responsible: Theresa Ebrey
Title: Accountant
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
Phone Number: 217-782-2061

AIC-Staff 1.10

Does Ms. Ebrey agree the form of schedules and workpapers, as opposed to the inputs, in the Part 285 filing remain the same from filing to filing? Please explain.

RESPONSE

Staff objects to this data request as being unclear and vague. Notwithstanding Staff's objection, no, Ms. Ebrey does not agree that the form of schedules and workpapers in a Part 285 filing remain the same from filing to filing. Part 285 sets forth "Minimum Filing Requirements" requiring certain minimum information to be provided. Part 285 does not dictate a specific format to present the information or in any way limit the amount of information over the minimum that is required. Part 285 filings vary from Company to Company and from filing to filing.

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AIC-Staff 1.14

If a change is not “of a ministerial nature” would Commission approval under Section 9-201 be required for the change? Explain why or why not.

RESPONSE

In Ms. Ebrey's opinion, only changes that impact the calculation of the revenue requirement on Schedules FR A-1 and FR A-1 REC would require Commission approval, as recommended in her direct testimony, ICC Staff Ex. 8.0, on pages 2 and 9.

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AIC-Staff 1.16

If a change did “have an[] impact on any issues in an[] ongoing case,” would Commission approval under Section 9-201 be required for the change? Explain why or why not.

RESPONSE

As noted in the response to AIC-Staff 1.15, in Ms. Ebrey’s opinion, a change that would have an impact on the methodology for the calculation of the filing year revenue requirement reflected on FR A-1 or the reconciliation year revenue requirement reflected on FR A-1 REC would not be ministerial in nature and would therefore require Commission approval under Section 9-201.

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AIC-Staff 1.24

Referring to ICC Staff Ex. 8.0, lines 86-90, Ms. Ebrey states the formula rate protocols for the performance-based formula rates to be as outlined in Section 16-108.5(c)(4) subparagraphs (A) through (I). For each protocol she identifies, state whether Ms. Ebrey contends such protocol is (i) reflected on the formula rate template, as she defines it, and (ii) if so, where. Explain the basis for her answer.

RESPONSE

The ratemaking impact of the formula rate protocols are reflected in the formula rate template, as Ms. Ebrey proposes to define that term, through the inputs for the various applicable schedules, appendices and workpapers that support the revenue requirements shown on Schedules FR A-1 and FR A-1 REC.