

**Ameren Illinois Company's
Response to AG Data Requests
Docket No. 14-0317
Rate MAP-P Modernization Action Plan - Pricing Annual Update Filing (2014)
Data Request Response Date: 7/3/2014**

AG 5.03

Ref: Ameren Response to data request AG 3.04 (Vendor Reviews/Disallowances). For each of the following example advertisements included in Mr. Kennedy's DWP 3, please confirm the total cost included in 2013 revenue requirements after Company self-disallowances (production, placement, overheads), explain the basis for not disallowing the advertisement cost including benefits to ratepayers, and describe the authority relied upon to request rate recovery of the advertisement cost (including ICC rules, statutes, prior rate orders, etc.):

- a) #3 Upgrading our Infrastructure to Deliver Better Service.
- b) #7 No profit advertising sponsorship match
- c) #9 Title Sponsorship Congressional Sports
- d) #28/28.1 Quincy Broadcasting Focus Forward "investing in smarter/reliable grid"
- e) #46 Focus Forward "investing in smarter/reliable grid"
- f) #47 Point of View Reports – planning at Ameren
- g) #52 Focused Energy for Life
- h) #53 Delivering Value
- i) #55 Forward Progress Ameren Illinois infrastructure action plan
- j) #56 Investing in New Technology to Upgrade Service
- k) #57 You tube video on infrastructure investments
- l) #58 TAC Focus Forward
- m) #59 MAP Action Plan for Future
- n) #60 MAP You Tube videos.

RESPONSE

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Ameren Illinois objects to this data request to the extent that it calls for legal conclusions on "authority relied upon to request rate recovery of the advertisement cost." Ameren Illinois also objects to the phrase "basis for not disallowing the advertisement cost including benefits to ratepayers" to the extent that this phrase purports to be a legal standard for cost recovery for formula ratemaking. Subject to those objections, AIC provides the following response sponsored by Mr. Tucker Kennedy.

Please see my direct testimony filed in this proceeding, Ameren Exhibit 6.0, pages 21-49, for a discussion of the criteria and standards that AIC considered when including 2013 customer communication costs in the updated revenue requirement. In addition, please see AG 5.03 Attach 1, which is an excerpt from my rebuttal testimony in Docket No. 13-0301 (Ameren Ex. 14.0(Rev.)) that discusses generally the purpose

of AIC's advertising expenses with respect to its Energy Infrastructure and Modernization Act (EIMA) infrastructure investment projects. Please also see the Rebuttal Testimony of Ms. Theresa Ebrey in Docket No. 13-0301 at page 9, where Ms. Ebrey withdrew her proposal to disallow EIMA-related advertising expenses.

Requested information for each item listed above is included in AG 5.03 Attach 2.

Generally, these projects reflect expenses incurred by Ameren Illinois to educate customers about a variety of topics, including the upgrades that Ameren Illinois is making to the energy delivery system. As AIC makes these improvements, it is important to let customers know how their rate dollars are being spent and what benefits the ratepayer can expect to receive in return. For example, the improvements Ameren Illinois is making under EIMA will provide customers with data that will enable them to better control their energy usage, manage costs, and save money. Educational communication is necessary to ensure that customers are aware of the full range of benefits that will become available to them. AIC enlists the services of external vendors who are subject matter experts to assist Ameren's Community and Public Relations team in creating and deploying effective communications to customers. Contracted services included research, graphic design, production and copywriting. Finally, EIMA specifically requires participating utilities to include in their AMI Plan a plan for consumer education to inform customers regarding the investments and benefits of AMI.

Ameren Illinois
Data Requests on Advertising Costs
2013
(In Dollars)

Voucher Number	Vendor Name	Total Cost	Ad Example No.	Basis for including the expense in the formula rate revenue requirement
002037804	BELLEVILLE NEWS DEMOCRAT	\$ 194	3	Educational newspaper ad informing customer of better service benefit- ratepayer informed that electric infrastructure will keep up with their usage (i.e. increased use of computers, high tech equipment)
002036239	CENTRAL ILLINOIS BUS Pubs	\$ 2,412	7	Contribution to support public welfare. Advertising space given as "in-kind" contribution to various agencies in the community. Benefit- public welfare
002008120	CONGRESSIONAL SPORTS	\$ 1,200	9	Educational informing customer AIC participation and support of raptor protection and rehab programs. benefit- ratepayer informed of AIC's respect for environment through supporting rehab center for raptors.
001908005	QUINCY BROADCASTING	\$ 4,535	28	Radio ads informing customers of new technology additions to detect and reduce outages, investing in a smarter, more reliable electric grid and how to learn more at AmerenIllinois.com.
001908008	QUINCY BROADCASTING	\$ 2,203	28	benefit- ratepayer is informed of increased efforts for added electric reliability and reduction of outages.
001856266	WEBER SHANDWICK	\$ 40,667	46	TV ads informing customers of new technology additions to detect and reduce outages, investing in a smarter, more reliable electric grid, help customer manage their energy use and save money, and how to learn more at AmerenIllinois.com.
001859605	WEBER SHANDWICK	\$ 6,573	46	Note: examples includes detail on media buy and placement, scripts for ad and pictures of video segments.

Ameren Illinois
 Data Requests on Advertising Costs
 2013
 (In Dollars)

			benefit- ratepayer is informed of increased efforts for added electric reliability and reduction of outages and way to help manage your energy used and save money. This basis pertains to all Weber Shandwick expenses in this worksheet
001890363	WEBER SHANDWICK	\$ 6,679	46 related ad example 46.
001890365	WEBER SHANDWICK	\$ 1,832	46
001890366	WEBER SHANDWICK	\$ 10,157	46
001895465	WEBER SHANDWICK	\$ 8,081	46
001912468	WEBER SHANDWICK	\$ 10,229	46
001912976	WEBER SHANDWICK	\$ 150,000	46
001940307	WEBER SHANDWICK	\$ 96,000	46
001971405	WEBER SHANDWICK	\$ 65	46
002019256	WEBER SHANDWICK	\$ 201	46
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001753324	ADVERTISERS PRINTING	\$ 3,017	47 Printing costs for 2012 copies of Point of View documents benefit- reference available for residential and business customers discussing the companies findings and basis for strategic planning.
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001800596	Simantel	\$ 299	52 Writing and Editing for Social Responsibility Report - benefit- reference available for residential and business customers discussing the companies' respect and protection of environment.
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001800603	Simantel	\$ 1,551	53 Writing and editing for Annual Report - benefit- reference available for residential and business customers discussing the companies' management and use of resources.
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001982379	CAPITOL BLUEPRINT CO	\$ 323	55 Printing costs for flyers-4th Quarter Forward Progress newsletter benefit - municipal leaders informed about specific improvements to AIC delivery system, creation of jobs, and savings through use of energy efficiency rebates and incentives.
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001886936	CENTRAL ILLINOIS BUS	\$ 540	56 Placement cost for ad in monthly magazine, Inter Business
001912978	WEBER SHANDWICK	\$ 7,349	56 Design and copywriting for Intelliruptor Advertorial

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 2013
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			benefit - informed magazine readers about advantages of automating the distribution grid and how intellirupters can significantly reduce the time customers are without electricity.
001919328	CREWSTAR INC	\$ 442	57 Videography of specific electric distribution field work in Jerseyville-Alton
001941768	WEBER SHANDWICK	\$ 3,244	57 Media outreach plan and set up with ID Media benefit-video used in customer outreach, social media and digital media to inform customers about electric distribution system upgrades in specific community of Alton/Jerseyville area to allow switching of circuits to get customers restored faster.
001970315	GORHAMS INC	\$ 332	58 Supplied attendees with calendar with printed link to AIC's Technology Applications Center--AmerenIllinois.com/TAC benefit - inform customers about new center open for technology application testing.
001785385	SIMANTEL	\$ 963	59 Provided photos and updated for Employment section of Map web pages
001813284	SIMANTEL	\$ 994	59 Prepare PPT for R Mark, Board of Directors presentation
001813285	SIMANTEL	\$ 270	59 Developed layout for letter and fact sheet
002020775	WEBER SHANDWICK	\$ 13,270	59 Research and develop content for MAP web pages, included banners and content. benefit- informed ratepayers through various media (web, presentation, written materials) about infrastructure improvement programs to reduce outage time, creating jobs, and keep up with customers growing energy needs.
001878501	SPOT CREATIVE MEDIA	\$ 180	60 Videography of specific electric distribution field work Hillsboro benefit-video used on AmerenIllinois.com Infrastructure Improvement home page to inform customers about electric distribution system upgrades and related outcomes (faster service restoration, reduced outage times with automated switching)