

ICC Docket No. 14-0312

**Illinois Chamber of Commerce ("ILCC") Response to
The People of the State of Illinois ("AG") Data Requests
ILCC 2.01 - 2.02**

Date Received: August 20, 2014

Date Served: August 25, 2014

REQUEST NO. AG-ILCC 2.02:

- (a) Is Mr. Maisch's testimony in this docket his personal opinion, or is he officially testifying on behalf of the IL Chamber?
- (b) What formal procedures does the IL Chamber have, if any, whereby its board or members or executive officers officially authorize or approve the submission of testimony on behalf of the IL Chamber in administrative or judicial proceedings?
- (c) If the answer to part (a) is that Mr. Maisch is testifying on behalf of the IL Chamber, were the procedures referenced in part (b) (if they exist) followed with respect to Mr. Maisch's submission of testimony in this matter? Please explain how the procedures were followed.

RESPONSE:

The Illinois Chamber of Commerce ("ILCC") objects to this request because it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. Without waiving this objection, the ILCC states as follows.

- (a) The ILCC objects to this request as vague and ambiguous, and specifically objects to the term "officially" as undefined. Subject to these objections, Mr. Maisch's testimony in this proceeding is not only his personal opinion, but it is also submitted as testimony on behalf of the ILCC.
- (b) The ILCC objects to this request as vague and ambiguous, and specifically objects to the term "officially" as undefined. Subject to these objections, while the Chamber's staff routinely consults with the Board of Directors, especially the chair of the Government Affairs Committee, there are certain items left to the discretion of the President and CEO.
- (c) Yes. The President and CEO approved submission of the testimony in this docket.

OFFICIAL FILE

I.C.C. DOCKET NO. 14-0312

AG Cross Exhibit No. 2

Witness _____

Date 8/27/14 Reporter CC