

ICC Docket No. 14-0312

Chicagoland Chamber of Commerce ("CCC") Response to
The People of the State of Illinois ("AG") Data Requests
CCC 2.01 – 2.02

Date Received: August 20, 2014

Date Served: August 25, 2014

REQUEST NO. AG-CCC 2.02:

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

RESPONSE:

The Chicagoland Chamber of Commerce ("CCC") 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 CCC states as follows.

- (a) The CCC objects to this request as vague and ambiguous, and specifically objects to the term "officially" as undefined. Subject to these objections, Mr. Carpenter's testimony in this proceeding is not only his personal opinion, but it is also submitted as testimony on behalf of the CCC.
- (b) The CCC objects to this request as vague and ambiguous, and specifically objects to the term "officially" as undefined. Subject to these objections, the officers and the public policy committee are responsible for approving the positions taken in an administrative proceeding such as the instant proceeding.
- (c) Yes. The CCC officers and public policy committee approved submission of the testimony in this docket. The approval of this testimony is based on the consistency of the position expressed in the testimony and the position taken when the CCC supported the EIMA legislation.

OFFICIAL FILEI.C.C. DOCKET NO. 14-0312AG Cross Exhibit No. 16Witness CarpenterDate 8/28/14 Reporter TO