

Dominick, Erika M

From: Dominick, Erika M
Sent: Tuesday, January 06, 2015 9:54 AM
To: 'bmhettin@yahoo.com' (bmhettin@yahoo.com)
Cc: Dearmont, Eric E
Subject: FW: ICC Docket No. 13-0390: Hettinger vs. AIC - First Set of Requests for Admission to Complainants
Attachments: DRs AIC-Hettinger 1.01 - 1.17 FINAL.docx; Ameren Exhibit 1.3 - May 2013.pdf; Ameren Exhibit 1.4 - June 2013.pdf; Ameren Exhibit 1.5 - July 2013.pdf

I inadvertently failed to include below the exhibits identified in Requests for Admission AIC-Hettinger 1.15, 1.16 and 1.17. I've attached them here for your reference.

Happ New Y ar!!

Thank you,
Erika

.....
ERIKA M. DOMINICK : : Illinois Regulatory Paralegal, Office of General Counsel : : T 314-554-3649
Ameren Services Company : : 1901 Chouteau Avenue, PO Box 66149, MC 1310 : : St. Louis, MO 63166-6149

Please consider the environment before printing this e-mail.

From: Dominick, Erika M
Sent: Monday, January 05, 2015 4:56 PM
To: 'bmhettin@yahoo.com' (bmhettin@yahoo.com)
Cc: Dearmont, Eric E
Subject: FW: ICC Docket No. 13-0390: Hettinger vs. AIC - First Set of Requests for Admission to Complainants

I have corrected the due date for these *Requests* on the attached. The correct due date is **January 19, 2015**. My apologies for the confusion.

Happ New Y ar!!

Thank you,
Erika

.....
ERIKA M. DOMINICK : : Illinois Regulatory Paralegal, Office of General Counsel : : T 314-554-3649
Ameren Services Company : : 1901 Chouteau Avenue, PO Box 66149, MC 1310 : : St. Louis, MO 63166-6149

Please consider the environment before printing this e-mail.

From: Dominick, Erika M
Sent: Monday, January 05, 2015 4:52 PM
To: 'bmhettin@yahoo.com'
Cc: Dearmont, Eric E
Subject: ICC Docket No. 13-0390: Hettinger vs. AIC - First Set of Requests for Admission to Complainants

OFFICIAL FILE
ILL. C. C. DOCKET NO. 13-0390
AIC Cross Exhibit No. 1
Witness Bernard Hettinger
Date 2/19/15 Reporter ACJ

Attached is Ameren Illinois' *First Set of Requests for Admission*. You may either type your responses on the attached and e-mail them back to us, or print a copy of the attached, handwrite your answers and then mail them to me at the address below. Responses should be received within 14 calendar days of today, or no later than **Monday, January 16, 2015**.

Please let us know if you have questions.

Happ New Year!!

Thank you,
Erika

.....

ERIKA M. DOMINICK : : Illinois Regulatory Paralegal, Office of General Counsel : : T 314-554-3649
Ameren Services Company : : 1901 Chouteau Avenue, PO Box 66149, MC 1310 : : St. Louis, MO 63166-6149

Please consider the environment before printing this e-mail

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

Bernard and Anne Hettinger,)	
Complainants,)	
)	
-vs-)	Docket No. 14-0390
)	
Ameren Illinois Company)	
d/b/a Ameren Illinois)	
Respondent.)	
)	
Complaint as to billing/charges in Grafton,)	
Illinois.)	

**AMEREN ILLINOIS COMPANY'S
FIRST SET OF REQUESTS FOR ADMISSIONS TO
COMPLAINANTS, BERNARD AND ANNE HETTINGER**

Ameren Illinois Company d/b/a Ameren Illinois (“AIC”, “Ameren Illinois”, or “the Company”), in accordance with the Rules of Practice of the Illinois Commerce Commission, 83 Ill. Admin. Code § 200.360, hereby submits the Requests for Admission jointly to Bernard and Anne Hettinger (“Responding Party”).

General Instructions

The following instructions and definitions apply to all of the documents, data, materials and answers sought in this request:

- a) In answering these data requests, furnish all information that is available to the Responding Party, including information in the possession, custody or control of the Responding Party’s agents, employees, representatives, affiliates or subsidiaries, and all others from whom the Responding Party may freely obtain it, and the Responding Party’s attorneys and investigators.

b) Each data request should be answered based upon the Responding Party's knowledge, information, or belief, and any answer that it is based upon information or belief should state that it is given upon such a basis.

c) If the Responding Party, its affiliates or subsidiaries, or any of the Responding Party's attorneys has possession, custody, or control of the originals of the documents requested, please produce the originals or a complete copy of the originals and all copies that are different in any way from the original.

d) If the Responding Party, its affiliates or subsidiaries, or any of the Responding Party's attorneys does not have possession, custody, or control of the originals of the documents requested, please produce any copies that are in the possession, custody, or control, however made, of the Responding Party or any of the Responding Party's attorneys. If any document requested is not in the Responding Party's possession or subject to the Responding Party's control, please explain its location, present custodian, and reason why it is not within the Responding Party's possession or control.

e) If any document is withheld under any claim of privilege, confidentiality, or confidential and proprietary, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipient(s) of original and copies, subject matter of the document, and the basis upon which such privilege, confidentiality, or confidential and proprietary is claimed.

f) In providing the Responding Party's responses, please start each response on a separate page and set forth in full, at the top of the page, the request that is being answered.

g) Please number all documents and work papers that are provided in response to this data request.

h) Please provide, for each numbered item of this data request, the name, job title, and work phone number of any and all persons responsible for preparing the responses to the numbered items.

i) For each numbered item of this data request, please identify the Responding Party's witness who will be responsible for answering cross-examination questions regarding the numbered item.

j) This data request remains active throughout the proceeding. If a document comes into existence, or if the Responding Party obtains any further or supplemental documents or information subsequent to the preparation and service of the Responding Party's responses hereto, please provide such documents or information as part of a supplemental response hereto.

k) As used in the data requests, the term "document" includes all materials subject to discovery pursuant to Ill. Supreme Court Rule 214 and 83 Ill. Admin. Code §200.360(c), including the original and all non-identical copies and drafts, (*e.g.*, copies with notes, editing marks, modifications, additions, or deletions) of all recorded or graphic matter whatsoever, whether in written or electronic form.

l) Responses are requested within 14 days, but no later than **January 19, 2015**. If possible, please email the responses to the following persons:

Eric Dearmont
edearmont@ameren.com

Erika M. Dominick
edominick@ameren.com

m) If responses need to be provided in hard copy, please mail them to:

Erika M Dominick, Paralegal
Ameren Services Company
1901 Chouteau Avenue
PO Box 66149, MC 1310
St. Louis, MO 63166-6149

n) Definitions for all other terms contained in these data requests shall be those used in the Public Utilities Act (“the Act”) or, if not defined therein, shall be the plain and ordinary meaning of the term.

REQUESTS FOR ADMISSION

AIC-Hettinger 1.01 Please admit that you are currently a residential natural gas customer of Ameren Illinois, with a service address of 1208 Eagle Lane, Grafton, Illinois.

AIC-Hettinger 1.02 Please admit that in April 2012, you contacted Ameren Illinois to formally request installation of natural gas service.

AIC-Hettinger 1.03 Please admit that during the conversation referenced in 1.02 (April 2012) you were informed that it was a requirement to have your lot to within 6 inches of final grade prior to the installation of natural gas facilities.

AIC-Hettinger 1.04 Please admit that in June 2012, you met with Ms. Eilering, a representative from Ameren Illinois.

AIC-Hettinger 1.05 Please admit that during the conversation referenced in AIC-Hettinger 1.04 (June 2012), you were informed by a representative of Ameren Illinois that you were required to have your lot at or near final grade prior to installation of gas service.

AIC-Hettinger 1.06 Please admit to receiving a copy of the brochure attached to Ameren Illinois’ direct testimony as Ameren Ex. 1.2.

AIC-Hettinger 1.07 Please admit that on or about November 13, 2012, you contacted Ameren Illinois and informed them that the property referenced in AIC-Hettinger 1.01 was ready for gas service installation.

AIC-Hettinger 1.08 Please admit that on or about November 26, 2012, a gas service line was installed at the property referenced in AIC Hettinger 1.01.

AIC-Hettinger 1.09 Please admit that you hired Frey Excavating to grade the property referenced in AIC-Hettinger 1.01 (1208 Eagle Lane) for installation of a new retaining wall.

AIC-Hettinger 1.10 Please admit that on or about June 20, 2013, Frey Excavating damaged the gas service line.

AIC-Hettinger 1.11 Please admit on or about June 27, 2013, you requested that the line be reset in the ground to a depth of three (3) feet.

AIC-Hettinger 1.12 Please admit that you contacted Ameren Illinois to report a gas outage on your property on or about July 29, 2013, and that upon arrival, Ameren Illinois reported that the gas service line had been cut and was approximately three (3) inches below top soil that had been freshly graded.

AIC-Hettinger 1.13 Please admit that your property referenced in AIC-Hettinger 1.01 (1208 Eagle Lane) was not near or at final grade at the time of the initial installation of the gas service line (November 2012).

AIC-Hettinger 1.14 Please admit that your property referenced in AIC-Hettinger 1.01 (1208 Eagle Lane) was not near or at final grade at the time of the reinstallation following the contact by Frey Excavating (June 2013).

AIC-Hettinger 1.15 Please admit that the photos contained in Ameren Ex. 1.3 were accurate depictions of your property as of approximately May 14, 2013. [Another copy is attached for your reference].

AIC-Hettinger 1.16 Please admit that the photos contained in Ameren Ex. 1.4 were accurate depictions of your property as of approximately June 20, 2013. [Another copy is attached for your reference].

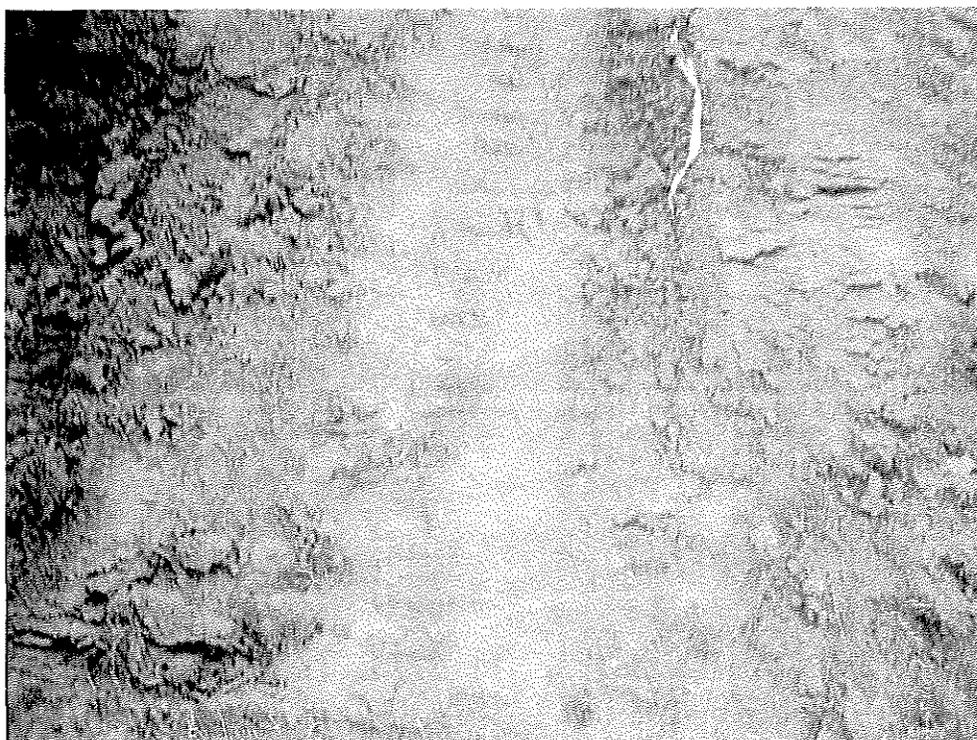
AIC-Hettinger 1.17 Please admit that the photos contained in Ameren Ex. 1.5 were accurate depictions of your property as of approximately July 31, 2014. [Another copy is attached for your reference].



Property of United States Infrastructure Corporation
Photo taken on 5/14/2013 10:59:53 AM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:40:08 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:40:30 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:41:00 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:42:58 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:51:54 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:52:06 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:52:10 PM



Property of United States Infrastructure Corporation
Photo taken on 6/20/2013 2:55:18 PM