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CHIEF CLERK'S OFFICE

Docket No. 15-0305

AMEREN ILLINOIS COMPANY )  
d/b/a Ameren Illinois, )  
Petitioner )  
 )  
Rate MAP-P Modernization Action Plan - )  
Pricing Annual Update Filing )

**VERIFIED PETITION**

Ameren Illinois Company d/b/a Ameren Illinois (Ameren Illinois) hereby submits this Verified Petition pursuant to and in compliance with Section 16-108.5(d) of the Public Utilities Act, 220 ILCS 5/16-108.5(d).

1. Ameren Illinois is engaged in the business of supplying electric power and energy throughout its service territory in the State of Illinois. Ameren Illinois is a “public utility” as defined in 220 ILCS 5/3-105, an “electric utility” as defined in 220 ILCS 5/16-102, and a “combination utility” and “participating utility” as defined in 220 ILCS 5/16-108.5(b).

2. On January 3, 2012, Ameren Illinois elected to become a “participating utility” in the State’s electric infrastructure investment program and petitioned the Illinois Commerce Commission (Commission) to approve a performance-based formula rate tariff, Modernization Action Plan – Pricing, or Rate MAP-P, to be annually updated in accordance with Section 16-108.5(d), to recover Ameren Illinois' actual electric delivery services costs, including the costs associated with investments made as part of the infrastructure investment program.

3. Section 16-108.5(d) requires a participating utility to file, on or before May 1 of each year, with the Chief Clerk of the Commission its updated cost inputs to the performance-based formula rate for the applicable rate year and the corresponding new charges, based on final historical data reflected in the utility's most recently filed annual FERC Form 1, plus projected

plant additions and correspondingly updated depreciation reserve and expense for the calendar year in which the inputs are filed. 220 ILCS 5/16-108.5(d). The updated formula inputs reflect historical data for 2014, plus projected plant additions and correspondingly updated depreciation reserve and expense for calendar year 2015. The new charges are to take effect beginning on the first billing day of the following January billing period.

4. The Ameren Illinois update filing includes data and calculations for the reconciliation and return on common equity collar provisions set forth in Section 16-108.5(d). The net revenue requirement includes an amount for reconciliation, plus interest, based on the difference between the actual costs for the prior rate year, 2014, and the actual revenue requirement in effect for 2014, as established in Docket No. 13-0301.

5. Ameren Illinois is making the filing that accompanies this Petition in compliance with Section 16-108.5(d). The filing sets forth Ameren Illinois' updated cost inputs to the performance-based formula rate for the applicable rate year and the corresponding new charges. The new charges as reflected in the attached Appendix A and also set forth in Ameren Illinois' filing, and are to take effect for the January 2016 billing period, in accordance with Section 16-108.5(d).

6. In support of this Verified Petition, Ameren Illinois is filing the testimonies and exhibits of the following witnesses:

Mr. Ronald D. Stafford: Supports and identifies the specific updated cost data that populates the formula rate template; presents changes to the formula schedules and appendices; identifies and supports the reconciliation of the revenue requirement reflected in rates for 2014.

Mr. Michael J. Getz: Testifies in support of the plant investment included in the proposed updated rate base; identifies the gross plant additions included in rate base that AIC placed in service by year-end 2014 and the gross plant additions included

in rate base that AIC projects will be placed in service by year-end 2015; identifies the amount of General Plant, Intangible Plant, Materials and Supplies and Construction Work In Progress included in rate base; addresses the Customer Accounts, Customer Service and Informational and Administrative and General expenses included in the updated revenue requirement.

- Mr. Ronald D. Pate: Describes generally the processes for planning, budgeting, and implementing capital investment and operational activities for the electric distribution network; outlines the types of plant investment that will support electric delivery service and be used and useful by the end of 2015; explains the major, specific projects disclosed in the F-4 Schedule and not yet included in approved rate base; covers the 2014 operation and maintenance (O&M) expenses that supported electric delivery service.
- Mr. Ryan J. Martin: Presents testimony regarding the capital structure and cost of capital, including the cost of debt and return on equity for updated rates.
- Mr. Thomas B. Kennedy, III: Testifies in support of recovery of expenses incurred in 2014 to fund contributions, sponsorships, community outreach and advertising in Ameren Illinois' service territory.
- Mr. Ryan K. Schonhoff: Discusses AIC's electric embedded cost of service studies, cost allocation methods, revenue allocation methods, and rate design; presents the prices developed as a result of this year's formula rate update and discusses the impact those price changes will have on customers' electric bills.
- Mr. James C. Blessing: Reports the 2014 and 2015 Energy Infrastructure Modernization Act- (EIMA-) related plant additions included in the updated revenue requirement; discusses the incremental nature of Ameren Illinois' 2014 EIMA capital investments; reports the 2014 EIMA O&M expenses charged to specific EIMA capital investment projects and other internal account 588 projects that Ameren Illinois uses to track EIMA-related O&M expenses; identifies the 2014 Advanced Metering Infrastructure consumer education and communication expenses; discusses how Ameren Illinois' 2014

performance for EIMA multi-year metrics will be reported.

Mr. Joseph A. Weiss:

Discusses the results of a lead-lag study prepared for Ameren Illinois' electric business and used to develop the cash working capital factors used to calculate Ameren Illinois' cash working capital requirements.

Mr. Robert Porter:

Provides explanations and support for the impact of Ameren Services Company-allocated expenses on the increase in Ameren Illinois' 2014 electric O&M expenses; discusses changes resulting from Ameren Corporation's December 2013 sale of its Ameren Energy Resources assets and the corresponding impact on Ameren Illinois and its affiliates.

WHEREFORE, based on the foregoing, Ameren Illinois Company respectfully requests that the Illinois Commerce Commission approve its updated cost inputs for its Modernization Action Plan – Pricing tariff, Rate MAP-P, authorize Ameren Illinois to place into effect for the January 2016 billing period the corresponding new charges set forth in its filing, and grant such other and further relief as deemed equitable and just.

Dated: April 24, 2015

Respectfully submitted,

AMEREN ILLINOIS COMPANY  
d/b/a Ameren Illinois

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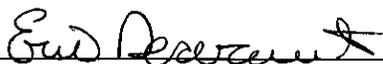
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**VERIFICATION**

STATE OF MISSOURI     )  
  )   SS  
CITY OF SAINT LOUIS    )

I, Eric Dearmont, Counsel for Ameren Illinois Company, being first duly sworn, state that: i) I have read the foregoing *Verified Petition*; ii) I am familiar with the facts stated therein, and iii) the facts stated therein are true and correct to the best of my knowledge, information and belief.

  
Eric Dearmont

SUBSCRIBED and SWORN to before me this 22 day of April, 2015.

  
Notary Public

