

The People of the State of Illinois
Responses to ICC Staff Data Requests AAA AG 1.01 – AAA AG 1.03
ICC Docket No. 15-0142
June 24, 2015

AAA AG 1.01.

For the GDS-1 customer class, has AG witness Rubin considered proposing different customer charges based on different meter sizes? If not, please explain any and all reasons why AG witness Rubin did not propose different customer charges based on different meter sizes.

RESPONSE:

Mr. Rubin considered this issue, but did not develop a specific proposal. In order to develop a specific proposal, information might be needed about the other elements of the customer charge and how they might differ for customers of different sizes (for example, whether the installed cost of the service line differs among different-sized customers).

He also did not develop a specific proposal because of concerns about customer impacts. To assess the customer impacts of such a proposal, it would be necessary to know the amount of gas consumed by customers with the larger-sized meters. Mr. Rubin is aware that Peoples Gas and North Shore Gas have three different customer charges for commercial customers (Service Classification 2) depending on the capacity of the meter (less than 700 cubic feet per hour ("cfh"); 700-3000 cubic cfh; greater than 3000 cfh). He did not know, however, if such classifications would be appropriate for AIC's GDS-1 class. It appeared to him that four classifications might be more appropriate for AIC (less than 300 cfh, 300-700 cfh, 700-4999 cfh, and 5000 cfh or more). Without consumption data for customers in each of those potential classes, he could not assess the impact on customers of making a significant change in rate design.

To develop such a proposal, it also would be necessary to know the target amount of revenues to be collected through customer charges. Mr. Rubin focused on this issue, rather than on the development of separate customer charges, as a way to address the unfairness in AIC's existing and proposed GDS-1 rate structure.

Finally, Mr. Rubin had developed a similar type of proposal (different residential customer charges depending on annual consumption) in a previous Peoples Gas / North Shore Gas case (09-0166 and 09-0167). Neither the Staff nor the utility supported that proposal and the Commission did not adopt it. Mr. Rubin, therefore, believed that a better approach to addressing the inequity in residential rate design was to focus on the cost-of-service rather than trying to create additional rate elements.

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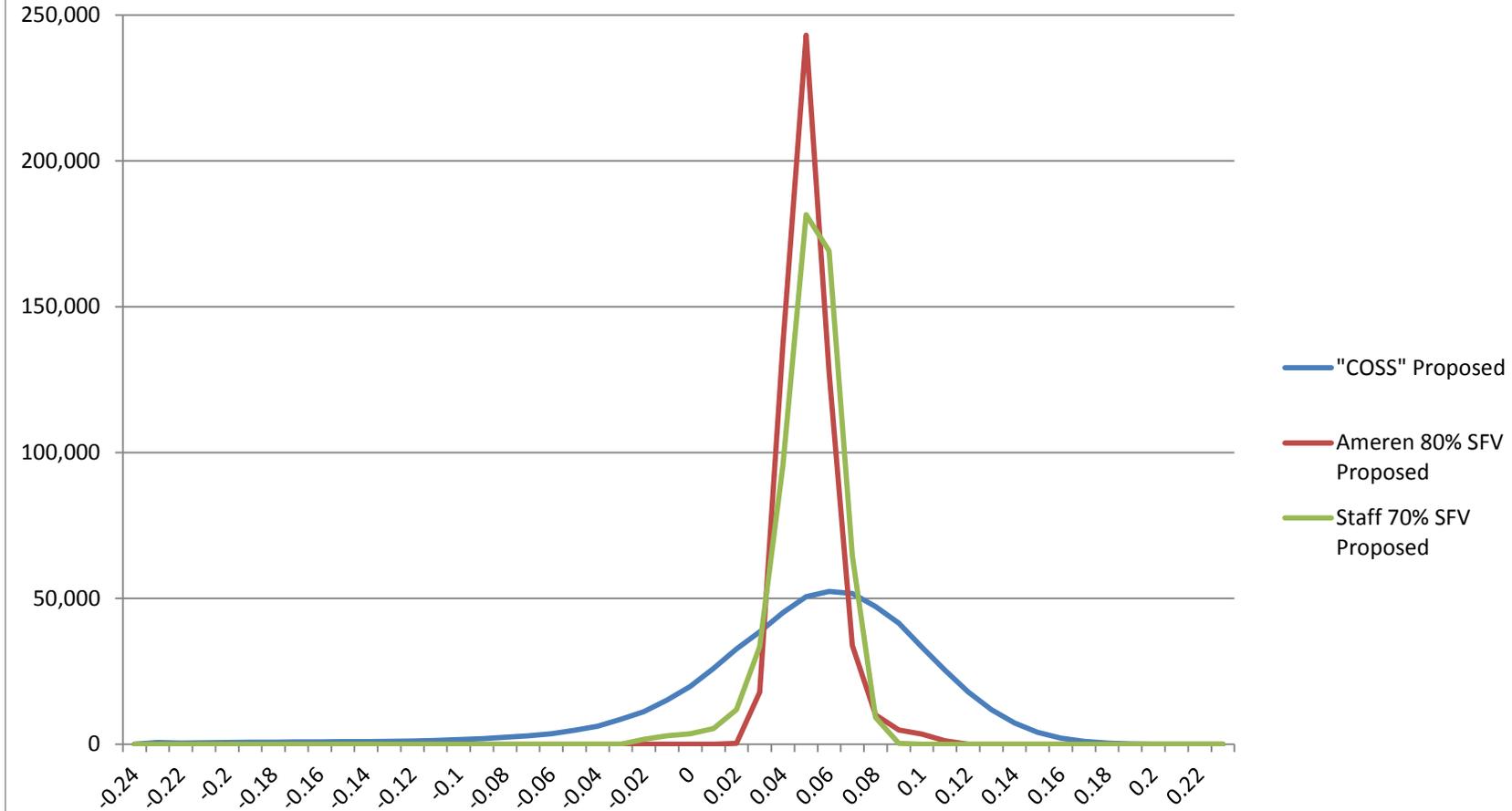
AAA AG 1.02.

For the GDS-1 customer class, has AG witness Rubin considered proposing subclasses based on different meter sizes? If not, please explain any and all reasons why AG witness Rubin did not propose different subclasses based on different meter sizes.

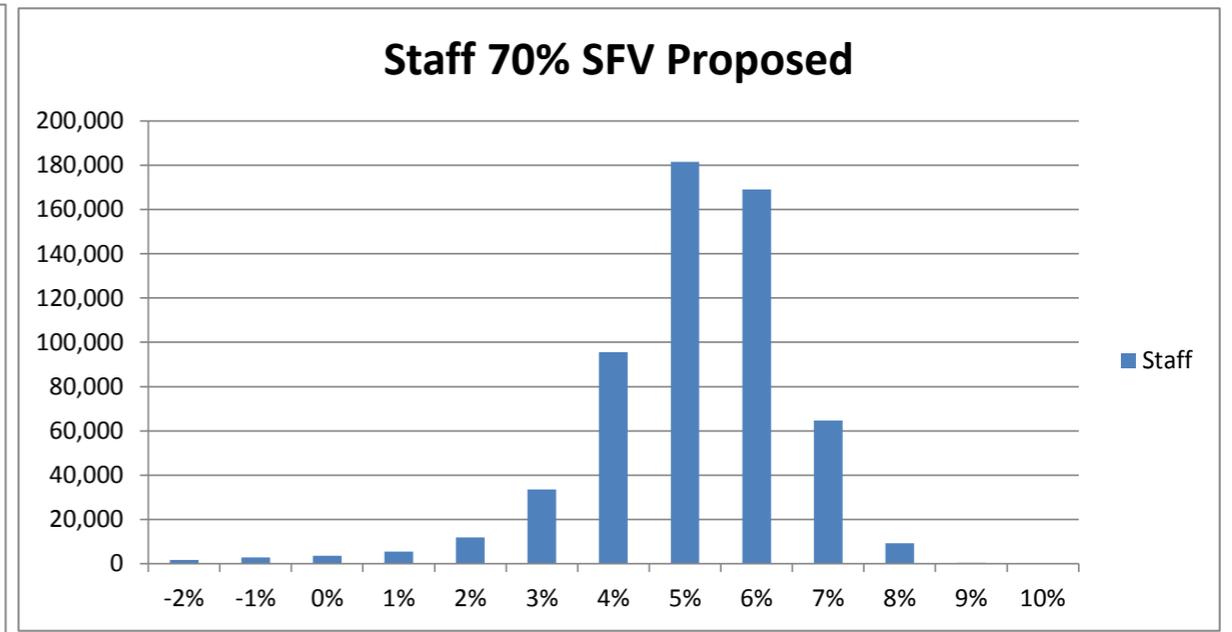
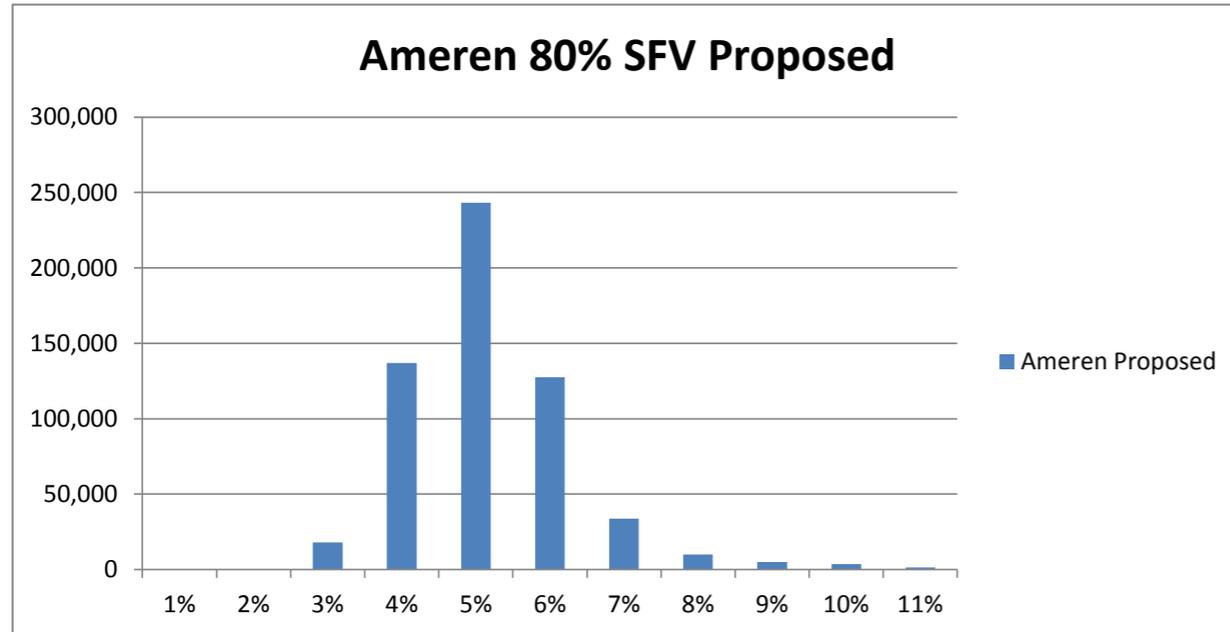
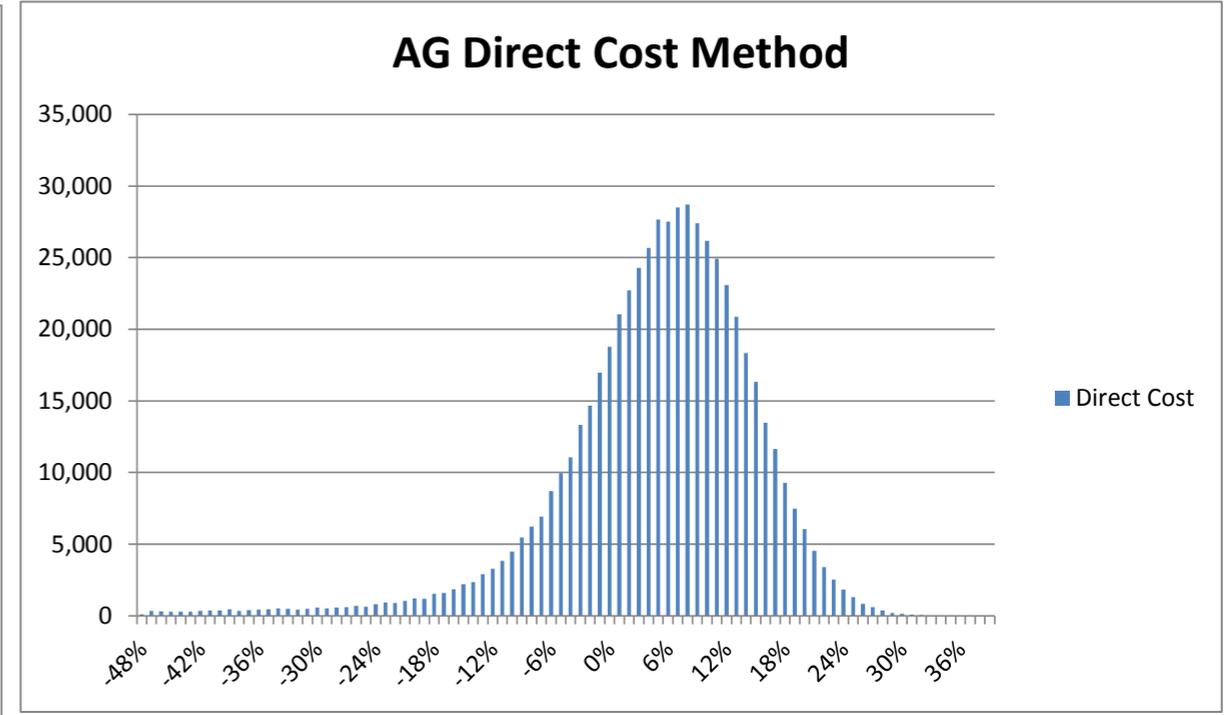
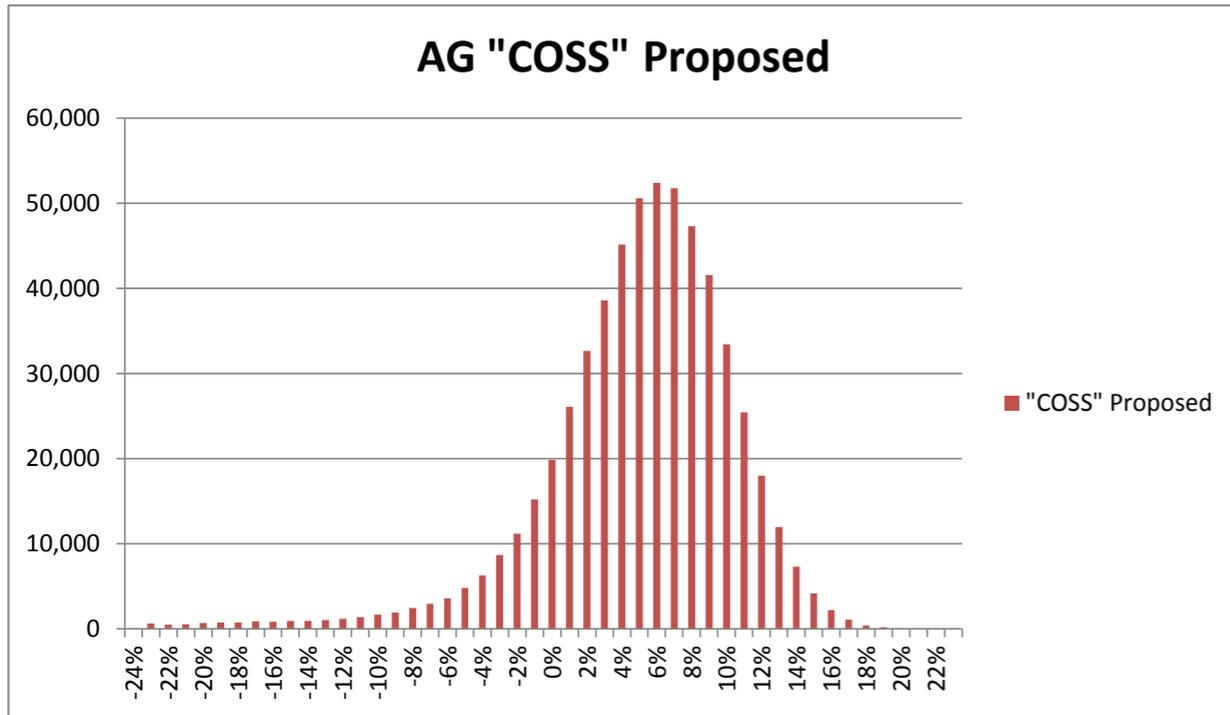
RESPONSE:

No. In order to develop separate subclasses, it would be necessary to prepare a new cost-of-service study that reflected those subclasses. Mr. Rubin does not have the information necessary to do so (such as consumption or demand data for customers with different-sized meters). See also the response to AAA AG 1.01.

GDS-1 Total Bill Impacts Under Various Rate Design Options (Percentage Change with associated Customer counts at each impact level)



GDS-1 Total Bill Impacts Under Various Rate Design Options
(Customers by Percentage Change in Bills)



Comparison of AIC Revenue Allocation to IIEC and AIC Correction to IIEC Revenue Allocation
Ameren Illinois Company - Rate Zone I

AIC Proposed Revenue Targets
Company Proposed Cost of Service Study (\$000)

Line	Description	Total					GDS-5	
		Rate Zone I (1)	GDS-1 (2)	GDS-2 (2)	GDS-3 (2)	GDS-4 (2)		
Company Proposed Cost of Service Study								
1	Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
2	Total Revenues at Proposed Rate of Return	\$94,436	\$65,405	\$19,388	\$3,675	\$5,040	\$928	Source: Ameren Exhibit 9.1
3a	less: TBS	\$2,411	\$1,678	\$586	\$105	\$35	\$7	Source: line 2 less Ameren Exhibit 10.2 (col 4)
3b	plus: Other Revenues	\$836	\$700	\$104	\$19	\$13	\$0	Source: Ameren Exhibit 10.2, Column 5
4	Total Sales Revenues at Proposed Rate of Return	\$92,862	\$64,427	\$18,907	\$3,589	\$5,019	\$921	Source: Ameren Exhibit 10.2, Column 6
5	Total Present Sales Revenues	\$79,149	\$55,315	\$16,677	\$3,137	\$3,685	\$335	Source: Ameren Exhibit 10.2, Column 3
6	Increase in Present Sales Revenue	\$13,713	\$9,111	\$2,230	\$452	\$1,334	\$586	Source: Ameren Exhibit 10.2, Column 7
7	Percent Increase in Sales Revenues	17.33%	16.47%	13.37%	14.41%	36.20%	175.27%	Source: Ameren Exhibit 10.2, Column 8
8	Rate Increase Limit at 1.5 Times Average	25.99%	25.99%	25.99%	25.99%	25.99%	25.99%	Source: Ameren Exhibit 10.2, Line 10
9	Class Increases to be Mitigated	(\$876)	\$0	\$0	\$0	(\$376)	(\$499)	Source: Ameren Exhibit 10.2, Column 14
10	Mitigated Class Increases Spread to Other Classes	\$876	\$645	\$194	\$37			Source: Ameren Exhibit 10.2, Column 13
11	Mitigated Increase	\$13,713	\$9,756	\$2,424	\$489	\$958	\$87	Source: Ameren Exhibit 10.2, Column 15
12	Mitigated Percent Increase	17.33%	17.64%	14.53%	15.57%	25.99%	25.99%	Source: Ameren Exhibit 10.2, Column 16

Replication of IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation

IIEC Adjusted Cost of Service Study	Total					GDS-5		
	Rate Zone I	GDS-1	GDS-2	GDS-3	GDS-4			
13	Company Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: IIEC Exhibit 1.2, Page 1 of 3
14	Total Revenues at Proposed Rate of Return	\$94,436	\$66,286	\$19,630	\$3,402	\$4,433	\$686	Source: IIEC Exhibit 1.2, Page 1 of 3
15	Other Revenues	\$3,035	\$3,954	(\$917)	(\$220)	(\$72)	\$291	Source: IIEC Exhibit 1.2, Page 1 of 3
16	Total Sales Revenues at Proposed Rate of Return	\$91,401	\$62,332	\$20,547	\$3,622	\$4,505	\$396	Source: IIEC Exhibit 1.2, Page 1 of 3
17	Present Sales Revenues	\$80,509	\$55,499	\$17,064	\$3,316	\$4,103	\$527	Source: IIEC Exhibit 1.2, Page 1 of 3
18	Increase in Present Sales Revenues	\$10,892	\$6,833	\$3,483	\$306	\$401	(\$131)	Source: IIEC Exhibit 1.2, Page 1 of 3
19	Percent Increase in Sales Revenues	13.53%	12.31%	20.41%	9.24%	9.78%	-24.89%	Source: IIEC Exhibit 1.2, Page 1 of 3
20	Rate Increase Limit at 1.5 Times Average	20.29%	20.29%	20.29%	20.29%	20.29%	20.29%	Source: IIEC Exhibit 1.2, Page 1 of 3
21	Class Increases to be Mitigated	(\$20)	\$0	(\$20)	\$0	\$0	\$0	Source: IIEC Exhibit 1.2, Page 1 of 3
22	Mitigated Class Increases Spread to Other Classes	\$20	\$17		\$1	\$1	\$0	Source: IIEC Exhibit 1.2, Page 1 of 3
23	Mitigated Increase	\$10,892	\$6,850	\$3,463	\$307	\$403	(\$131)	Source: IIEC Exhibit 1.2, Page 1 of 3
24	Mitigated Percent Increase	13.53%	12.34%	20.29%	9.27%	9.81%	-24.86%	Source: IIEC Exhibit 1.2, Page 1 of 3

AIC Corrected IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation

IIEC Adjusted Cost of Service Study	Total					GDS-5		
	Rate Zone I	GDS-1	GDS-2	GDS-3	GDS-4			
25	Company Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
26	Total Revenues at Proposed Rate of Return	\$94,436	\$66,286	\$19,630	\$3,402	\$4,433	\$686	Line 14 Above
27	less: TBS	\$2,411	\$1,678	\$586	\$105	\$35	\$7	Source: line 2 less Ameren Exhibit 10.2 (col 4)
28	plus: Other Revenues	\$836	\$700	\$104	\$19	\$13	\$0	Source: Ameren Exhibit 10.2, Column 5
29	Total Sales Revenues at Proposed Rate of Return	\$92,862	\$65,307	\$19,148	\$3,316	\$4,411	\$680	Line 26 less Line 27 plus Line 28
30	Total Present Sales Revenues	\$79,149	\$55,315	\$16,677	\$3,137	\$3,685	\$335	Source: Ameren Exhibit 10.2, Column 3
31	Increase in Present Sales Revenue	\$13,713	\$9,992	\$2,471	\$179	\$726	\$345	Line 29 less Line 30
32	Percent Increase in Sales Revenues	17.33%	18.06%	14.82%	5.71%	19.71%	103.17%	Line 29 divided by Line 30 Minus 1
33	Rate Increase Limit at 1.5 Times Average	25.99%	25.99%	25.99%	25.99%	25.99%	25.99%	Line 8 Above
34	Class Increases to be Mitigated	(\$258)	\$0	\$0	\$0	\$0	(\$258)	Line 32 less Line 33 times Line 30
35	Mitigated Class Increases Spread to Other Classes	\$258	\$181	\$55	\$10	\$12		Line 34 Allocated based on Line 30
36	Mitigated Increase	\$13,713	\$10,173	\$2,526	\$189	\$738	\$87	Line 31 plus Line 34 plus Line 35
37	Mitigated Percent Increase	17.33%	18.39%	15.14%	6.04%	20.04%	25.99%	Line 36 divided by Line 30

**Comparison of AIC Revenue Allocation to IIEC and AIC Correction to IIEC Revenue Allocation
Ameren Illinois Company - Rate Zone II**

**AIC Proposed Revenue Targets
Company Proposed Cost of Service Study (\$000)**

Line	Description	Total					GDS-5	
		Rate Zone II	GDS-1	GDS-2	GDS-3	GDS-4		
		(1)	(2)	(2)	(2)	(2)	(2)	
Company Proposed Cost of Service Study								
1	Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
2	Total Revenues at Proposed Rate of Return	\$103,255	\$68,561	\$17,964	\$5,741	\$9,241	\$1,747	Source: Ameren Exhibit 9.1
3a	less: TBS	\$3,132	\$2,226	\$607	\$218	\$73	\$8	Source: line 2 less Ameren Exhibit 10.2 (col 4)
3b	plus: Other Revenues	\$938	\$769	\$127	\$20	\$20	\$3	Source: Ameren Exhibit 10.2, Column 5
4	Total Sales Revenues at Proposed Rate of Return	\$101,061	\$67,105	\$17,484	\$5,543	\$9,188	\$1,742	Source: Ameren Exhibit 10.2, Column 6
5	Total Present Sales Revenues	\$88,162	\$59,838	\$15,221	\$4,119	\$8,359	\$623	Source: Ameren Exhibit 10.2, Column 3
6	Increase in Present Sales Revenues	\$12,900	\$7,267	\$2,262	\$1,424	\$828	\$1,119	Source: Ameren Exhibit 10.2, Column 7
7	Percent Increase in Sales Revenues	14.63%	12.14%	14.86%	34.57%	9.91%	179.41%	Source: Ameren Exhibit 10.2, Column 8
8	1.5 Times Average	21.95%	21.95%	21.95%	21.95%	21.95%	21.95%	Source: Ameren Exhibit 10.2, Line 10
9	Class Increases to be Mitigated	(\$1,502)	\$0	\$0	(\$520)	\$0	(\$982)	Source: Ameren Exhibit 10.2, Column 14
10	Mitigated Class Increases Spread to Other Classes	\$1,502	\$1,077	\$274		\$150		Source: Ameren Exhibit 10.2, Column 13
11	Mitigated Increase	\$12,900	\$8,344	\$2,536	\$904	\$979	\$137	Source: Ameren Exhibit 10.2, Column 15
12	Mitigated Percent Increase	14.63%	13.94%	16.66%	21.95%	11.71%	21.95%	Source: Ameren Exhibit 10.2, Column 16

**Replication of IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation**

Line	IIEC Adjusted Cost of Service Study	Total					GDS-5	
		Rate Zone II	GDS-1	GDS-2	GDS-3	GDS-4		
13	Company Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: IIEC Exhibit 1.3, Page 2 of 3
14	Total Revenues at Co. Proposed Rate of Return	\$103,255	\$70,612	\$18,429	\$5,661	\$7,265	\$1,289	Source: IIEC Exhibit 1.3, Page 2 of 3
15	Other Revenues	(\$8,208)	(\$7,000)	(\$554)	\$51	(\$1,367)	\$663	Source: IIEC Exhibit 1.3, Page 2 of 3
16	Total Sales Revenues at Proposed Rate of Return	\$111,462	\$77,611	\$18,983	\$5,610	\$8,632	\$626	Source: IIEC Exhibit 1.3, Page 2 of 3
17	Present Sales Revenues	\$90,636	\$60,241	\$15,584	\$4,403	\$9,492	\$917	Source: IIEC Exhibit 1.3, Page 2 of 3
18	Increase in Present Sales Revenues	\$20,826	\$17,371	\$3,400	\$1,207	(\$860)	(\$291)	Source: IIEC Exhibit 1.3, Page 2 of 3
19	Percent Increase in Sales Revenues	22.98%	28.84%	21.82%	27.41%	-9.06%	-31.75%	Source: IIEC Exhibit 1.3, Page 2 of 3
20	Rate Increase Limit at 1.5 Times Average	34.47%						Source: IIEC Exhibit 1.3, Page 2 of 3

**AIC Corrected and Completed IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation**

Line	IIEC Adjusted Cost of Service Study	Total					GDS-5	
		Rate Zone II	GDS-1	GDS-2	GDS-3	GDS-4		
21	Company Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
22	Total Revenues at Proposed Rate of Return	\$103,255	\$70,612	\$18,429	\$5,661	\$7,265	\$1,289	Line 14 Above
23	less: TBS	\$3,132	\$2,226	\$607	\$218	\$73	\$8	Source: line 2 less Ameren Exhibit 10.2 (col 4)
24	plus: Other Revenues	\$938	\$769	\$127	\$20	\$20	\$3	Source: Ameren Exhibit 10.2, Column 5
25	Total Sales Revenues at Proposed Rate of Return	\$101,061	\$69,156	\$17,948	\$5,463	\$7,212	\$1,283	Line 22 less Line 23 plus Line 24
26	Total Present Sales Revenues	\$88,162	\$59,838	\$15,221	\$4,119	\$8,359	\$623	Source: Ameren Exhibit 10.2, Column 3
27	Increase (Decrease) in Present Sales Revenues	\$12,901	\$9,317	\$2,727	\$1,344	(\$1,148)	\$660	Line 25 less Line 26
28	Percent Increase (Decrease) in Sales Revenues	14.63%	15.57%	17.92%	32.63%	-13.73%	105.86%	Line 25 divided by Line 26 Minus 1
29	1.5 Times Average	21.95%	21.95%	21.95%	21.95%	21.95%	21.95%	Line 8 Above
30	Class Increases to be Mitigated	(\$963)			(\$440)		(\$523)	Line 28 less Line 29 times Line 26
31	Mitigated Class Increases Spread to Other Classes	\$963	\$691	\$176		\$97		Line 30 Allocated based on Line 26
32	Mitigated Increase	\$12,901	\$10,008	\$2,903	\$904	(\$1,051)	\$137	Line 27 plus Line 30 plus Line 31
33	Mitigated Percent Increase	14.63%	16.73%	19.07%	21.95%	-12.57%	21.95%	Line 32 divided by Line 26

**Comparison of AIC Revenue Allocation to IIEC and AIC Correction to IIEC Revenue Allocation
Ameren Illinois Company - Rate Zone III**

**AIC Proposed Revenue Targets
Company Proposed Cost of Service Study (\$000)**

Line	Description	Total					GDS-5	
		Rate Zone III	GDS-1	GDS-2	GDS-3	GDS-4		
		(1)	(2)	(2)	(2)	(2)	(2)	
Company Proposed Cost of Service Study								
1	Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
2	Total Revenues at Proposed Rate of Return	\$207,233	\$143,594	\$36,316	\$8,969	\$16,111	\$2,244	Source: Ameren Exhibit 9.1
3a	less: TBS	\$5,795	\$4,037	\$1,279	\$317	\$139	\$24	Source: line 2 less Ameren Exhibit 10.2 (col 4)
3b	plus: Other Revenues	\$1,875	\$1,532	\$251	\$46	\$46	\$1	Source: Ameren Exhibit 10.2, Column 5
4	Total Sales Revenues at Proposed Rate of Return	\$203,313	\$141,089	\$35,288	\$8,698	\$16,017	\$2,221	Source: Ameren Exhibit 10.2, Column 6
5	Total Present Sales Revenues	\$177,799	\$129,580	\$31,498	\$7,700	\$8,193	\$828	Source: Ameren Exhibit 10.2, Column 3
6	Increase in Present Sales Revenues	\$25,514	\$11,508	\$3,790	\$998	\$7,824	\$1,393	Source: Ameren Exhibit 10.2, Column 7
7	Percent Increase in Sales Revenues	14.35%	8.88%	12.03%	12.96%	95.50%	168.27%	Source: Ameren Exhibit 10.2, Column 8
8	Rate Increase Limit at 1.5 Times Average	21.52%	21.52%	21.52%	21.52%	21.52%	21.52%	Source: Ameren Exhibit 10.2, Line 10
9	Class Increases to be Mitigated	(\$7,275)	\$0	\$0	\$0	(\$6,061)	(\$1,215)	Source: Ameren Exhibit 10.2, Column 14
10	Mitigated Class Increases Spread to Other Classes	\$7,275	\$5,586	\$1,358	\$332			Source: Ameren Exhibit 10.2, Column 13
11	Mitigated Increase	\$25,514	\$17,094	\$5,148	\$1,330	\$1,764	\$178	Source: Ameren Exhibit 10.2, Column 15
12	Mitigated Percent Increase	14.35%	13.19%	16.34%	17.27%	21.52%	21.52%	Source: Ameren Exhibit 10.2, Column 16

**Replication of IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation**

Line	IIEC Adjusted Cost of Service Study	Total					GDS-5	
		Rate Zone III	GDS-1	GDS-2	GDS-3	GDS-4		
13	Company Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: IIEC Exhibit 1.3, Page 3 of 3
14	Total Revenues at Co. Proposed Rate of Return	\$207,233	\$146,542	\$37,036	\$8,646	\$13,249	\$1,761	Source: IIEC Exhibit 1.3, Page 3 of 3
15	Other Revenues	\$5,175	(\$524)	\$47	(\$104)	\$5,016	\$739	Source: IIEC Exhibit 1.3, Page 3 of 3
16	Total Sales Revenues at Proposed Rate of Return	\$202,058	\$147,065	\$36,989	\$8,750	\$8,232	\$1,022	Source: IIEC Exhibit 1.3, Page 3 of 3
17	Present Sales Revenues	\$181,031	\$130,173	\$32,247	\$8,135	\$9,208	\$1,269	Source: IIEC Exhibit 1.3, Page 3 of 3
18	Increase in Present Sales Revenues	\$21,027	\$16,892	\$4,742	\$615	(\$976)	(\$247)	Source: IIEC Exhibit 1.3, Page 3 of 3
19	Percent Increase in Sales Revenues	11.62%	12.98%	14.71%	7.56%	-10.60%	-19.44%	Source: IIEC Exhibit 1.3, Page 3 of 3
20	Rate Increase Limit at 1.5 Times Average	17.42%						Source: IIEC Exhibit 1.3, Page 3 of 3

**AIC Corrected and Completed IIEC Exhibit 1.3
IIEC Adjusted Cost of Service Study (\$000)
Design Day Demand Allocation**

Line	IIEC Adjusted Cost of Service Study	Total					GDS-5	
		Rate Zone III	GDS-1	GDS-2	GDS-3	GDS-4		
21	Proposed Rate of Return	8.013%	8.013%	8.013%	8.013%	8.013%	8.013%	Source: Ameren Exhibit 9.1
22	Total Revenues at Proposed Rate of Return	\$207,233	\$146,542	\$37,036	\$8,646	\$13,249	\$1,761	Line 14 Above
23	less: TBS	\$5,795	\$4,037	\$1,279	\$317	\$139	\$24	Source: line 2 less Ameren Exhibit 10.2 (col 4)
24	plus: Other Revenues	\$1,875	\$1,532	\$251	\$46	\$46	\$1	Source: Ameren Exhibit 10.2, Column 5
25	Total Sales Revenues at Proposed Rate of Return	\$203,314	\$144,037	\$36,008	\$8,375	\$13,156	\$1,738	Line 22 less Line 23 plus Line 24
26	Total Present Sales Revenues	\$177,799	\$129,580	\$31,498	\$7,700	\$8,193	\$828	Source: Ameren Exhibit 10.2, Column 3
27	Increase in Present Sales Revenues	\$25,514	\$14,457	\$4,510	\$675	\$4,963	\$910	Line 25 less Line 26
28	Percent Increase in Sales Revenues	14.35%	11.16%	14.32%	8.77%	60.57%	109.93%	Line 25 divided by Line 26 Minus 1
29	Rate Increase Limit at 1.5 Times Average	21.52%	21.52%	21.52%	21.52%	21.52%	21.52%	Line 8 Above
30	Class Increases to be Mitigated	(\$3,931)	\$0	\$0	\$0	(\$3,199)	(\$732)	Line 28 less Line 29 times Line 26
31	Mitigated Class Increases Spread to Other Classes	\$3,931	\$3,018	\$734	\$179			Line 30 Allocated based on Line 26
32	Mitigated Increase	\$25,514	\$17,475	\$5,243	\$855	\$1,764	\$178	Line 27 plus Line 30 plus Line 31
33	Mitigated Percent Increase	14.35%	13.49%	16.65%	11.10%	21.52%	21.52%	Line 32 divided by Line 26