

Ameren Illinois Company's
Response to Illinois Office of Attorney General Data Request
Docket No. 15-0305
Rate MAP-P Modernization Action Plan - Pricing Annual Update Filing (2015)

AG 8.02R

Ref: Ameren Ex. 18.0, page 23, line 502. At line 502 of his surrebuttal, Mr. Weiss references the “time and expense of generating additional customer remittance data” and “an easier and more cost-effective method of arriving at a more comprehensive and accurate result”. Provide an estimate of the hours and cost that would be involved in replicating the customer remittance data extraction and analysis for an updated 12-month period, using the data query and analysis tools that have already been developed by Ameren to support Mr. Weiss’ analysis of this data, as described in his Rebuttal. Please provide workpapers associated with these calculations.

REVISED RESPONSE

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Date: 09/20/2015

At a minimum, Mr. Weiss would estimate that it would take the Company approximately 3-5 weeks to provide the raw customer remittance data. This is based on IT department working time to run and QC data queries separately by month for each of the Ameren Illinois service territories (it is estimated that the analysis would produce 1.4 million lines of data per month). An additional week would be required for Concentric to analyze the data. This Concentric analysis is estimated to cost \$14,500. Additional costs would be incurred related to the IT work described above, however, it is not feasible to develop an estimated cost for that work in the time frame needed to respond to this DR.