

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

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AMEREN ILLINOIS COMPANY	)	
d/b/a Ameren Illinois,	)	
Petitioner	)	Docket No. 15-0142
	)	
Proposed general increase in gas delivery	)	
service rates and revisions to other terms	)	
and conditions of service.	)	

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**REPLY BRIEF OF THE STAFF  
OF THE ILLINOIS COMMERCE COMMISSION**

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**REPLY BRIEF OF THE STAFF  
OF THE ILLINOIS COMMERCE COMMISSION**

NOW COME the Staff witnesses of the Illinois Commerce Commission (“Staff”), by and through their undersigned counsel, pursuant to Section 200.800 of the Illinois Commerce Commission’s Rules of Practice (83 Ill. Adm. Code 200.800), and the direction of the Administrative Law Judges (“ALJs”), respectfully submit their Reply Brief (“Staff RB”) in the above-captioned matter.

**I. INTRODUCTION**

In addition to Staff and Ameren Illinois Company d/b/a Ameren Illinois (“AIC” or “Ameren” or the “Company”), the following parties filed Initial Briefs in this proceeding: The People of the State of Illinois *ex rel.* Lisa Madigan, Attorney General of the State of Illinois (“AG”); Citizens Utility Board (“CUB”) individually; Archer-Daniels Midland as one of Illinois Industrial Energy Consumers (“IIEC”) individually; CUB and IIEC collectively (“CUB/IIEC”); and Illinois Competitive Energy Association together with the Retail Energy Supply Association (“ICEA/RESA”).

While most of the issues have been resolved, there are a few issues which remain in dispute. For the reasons stated below, Staff's proposed adjustments should be adopted by the Commission. In instances where Staff does not address an issue in this brief, Staff makes no further recommendation on that issue but instead stands on Staff's position as set forth in Staff's Initial Brief ("Staff's IB").

## **II. RATE BASE**

### **A. Resolved/Uncontested Issues**

- 1. Working Capital for Gas in Storage**
- 2. Gas Vehicle Plant Additions**
- 3. Customer Advances**
- 4. Qualifying Infrastructure Plant (QIP Additions)**
- 5. Asset Retirement Obligations**
- 6. Original Cost Determinations**
- 7. Hillsboro Used and Useful**

### **B. Contested issues**

- 1. Accounts Payable for Gas Stored Underground**
- 2. Non-Union Salaries and Wages (see III.B.2)**
- 3. Incentive Compensation Costs (see III.B.3)**
- 4. Qualified Pension and Other Post-Employment Benefit Costs (see III.B.4)**
- 5. Non-Qualified Pension Costs (see III.B.5)**
- 6. Gasoline and Diesel Fuel Costs (see III.B.6)**
- 7. Gas-Only Employee Headcount/Vacancy Costs (see III.B.7)**

### **C. Recommended Rate Base**

### **III. Operating Revenues and Expenses**

#### **A. Resolved/Uncontested Issues**

- 1. Ameren Services Company (AMS) Test Year Charges**
- 2. Transmission Lines Assessment and Inspection Expense**
- 3. Rate Case Expense**
- 4. Payroll Taxes**
- 5. Lobbying Expense**
- 6. Uncollectible Expense/Gross Revenue Conversion Factors**
- 7. Rental Revenues**
- 8. Asset Retirement Obligations (see II.A.5)**

#### **B. Contested Issues**

##### **1. Charitable Contributions**

Section 9-227 of the Public Utilities Act (the “Act”) directs the Commission to treat charitable contributions as an operating expense, so long as those expenses are reasonable in amount. 220 ILCS 5/9-227. However, Section 9-227 does not presume that every donation is reasonable and the burden of proof to demonstrate that the amount claimed as an operating expense is reasonable falls squarely on the utility. See, e.g., Business and Professional People for the Public Interest et al. v. The Illinois Commerce Commission et al, 146 Ill.2d 175, 255 (1991). AIC has failed to meet that burden.

The Company argues that its proposed contributions are less than the per-customer contributions being recovered in rates by other large electric and gas utilities in Illinois. (AIC IB, 16.) While this may or may not be the case, it is not the proper standard

by which to determine reasonableness.<sup>2</sup> Comparison of Ameren's per-customer donations with those of another utility are meaningless for the purpose of determining reasonableness in this rate case absent a similar analysis of how the per-customer donations compare with a customer's utility bill as a whole and, even more importantly, without a comparison of how the per-customer donation has changed from year to year. If the utilities with which AIC would compare itself have historically given at much higher rates than AIC, it would stand to reason that the per-customer charge is a reflection of that historical giving. Comparing AIC's proposal to the level of per-customer donations made by other utilities demonstrates only the level of giving at which other utilities are engaged; it says nothing about whether AIC's proposal to charge customers at a comparable level is reasonable in this case. In order to determine reasonableness, AIC's proposal must be considered not in comparison to any other utility but on its own merits. AIC fails to meet the burden of demonstrating its proposed increase is reasonable.

AIC states it spent more on gas-allocated contributions in 2014 (\$400,000) than what it is currently recovering in gas rates (\$317,000) from Docket 13-0192. Id. at 20. AIC further states it has already spent \$432,000 allocable to gas in 2015. Id. What Staff questions and what AIC has failed to explain, however, is how these numbers demonstrate that the amount requested for 2016 is reasonable.

AIC is asking ratepayers to fund \$1,039,000 in charitable contributions in 2016. This is a 228% increase over what they currently collect and a 141% increase over what AIC has funded thus far in 2015. The requested 228% increase represents a jump from

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<sup>2</sup> AIC fails to provide support for their contention that comparison to other utilities is the proper test of reasonableness.

\$.39 per customer to approximately \$1.28 per customer. (AIC IB, 18.) Even if AIC were to double what it has already contributed in 2015 before the end of the year, the amount it requests for 2016 would still be more than a 20% increase over that doubled spending. While AIC would have the Commission grant a significant increase in charitable spending to be recouped from customers simply because other utilities have higher per customer charitable contribution costs, AIC does not and cannot argue that a 228% increase is reasonable.

Utilities are allowed to include charitable contributions in the rates they charge to customers based on the presumption that those charitable dollars will support causes in the utilities service area and that support of those causes will be viewed favorably by ratepayers; there is no shortage of worthwhile causes in need of support. It should be noted, however, that there is no obligation for the utility to fund any particular charity at any particular level once a rate increase is approved, notwithstanding any statements by the Company that it plans to fund a specific cause at a specific dollar amount. Accordingly, the Commission reviews charitable contributions the same way it reviews any other portion of a Company's filing: it must make a determination that the proposed funding level is both reasonable and allowable, without infringing on the Company's right to make a business decision as to how any funds should be spent. Further, the Commission must determine the reasonableness of the amount of contributions based on the *total* contributions in addition to individually evaluating each proposed contribution. "There are numerous charitable organizations worthy of [a utility's] support. If [AIC] were to make a reasonable donation to each of these organizations, the aggregate total of the

donations could very easily exceed a reasonable amount.” Business and Professional People for the Public Interest, 146 Ill.2d 175, 255.

Staff offers no opinion on the particular programs AIC asserts it will fund through increased rate-payer funded charitable giving. The Commission does not and should not weigh the merits of a utility’s support for one particular charity or cause versus another. Rather, the issue is one of reasonableness. The utility bears the burden of demonstrating that the costs it seeks to recoup from ratepayers are reasonable. In light of the Company’s past practices, addressed more fully in Staff’s IB, a 228% increase in ratepayer-funded charitable contributions is not reasonable and should not be allowed.

- 2. Non-Union Salaries and Wages**
- 3. Incentive Compensation Costs**
- 4. Qualified Pension and Other Post-Employment Benefit Costs**
- 5. Non-Qualified Pension Costs**
- 6. Gasoline and Diesel Fuel Costs**

Staff and Ameren are in agreement on this issue. However, Staff continues to disagree with the AG. The AG argues that its use of gasoline and diesel fuel prices based on actual prices from the local market is superior to Staff’s proposed fuel prices, which are national average prices. (AG IB, 44.) Staff disagrees. Staff notes that its proposal places reliance on U.S. Energy Information Administration (“EIA”) prices and that Staff included a correction factor for differences between Ameren’s historical gasoline prices and the historical EIA values. (Staff Ex. 5.0, 6-7.) Further, Staff noted that Ameren’s historical diesel fuel prices already directly correlated to the historical EIA prices. Id. at

9. Therefore, Staff's proposal accounts for variances that may exist between the local fuel market and EIA's national forecast.

Staff discussed this issue in depth in its initial brief. (Staff IB, 6-7, 15-16.) Notwithstanding the AG's position to the contrary, Staff believes its proposal is more accurate and therefore clearly superior to the AG's. Staff recommends that the Commission accept its proposal for the valuation of Ameren's gasoline and diesel fuel cost.

**7. Gas-Only Employee Headcount/Vacancy Costs**

**8. Gas Distribution and Transmission Expense**

**a. Sewer Cross Bore Inspections**

**b. Gas Records Management**

**c. Corrosion Control Painting**

**d. Damage Prevention**

**e. Gas Technology Institute Operations Technology Development**

**9. Gas Storage Expense**

**a. Well-Related Work**

**b. Compressor-Related Work**

**10. Sales Forecast – Test Year Billing Determinants**

**C. Recommended Operating Income Statements**

**IV. COST OF CAPITAL AND RATE OF RETURN**

**A. Resolved/Uncontested Issues**

**1. Short-Term Debt**

2. **Long-Term Debt**
3. **Preferred Stock**
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- B. Contested Issues (NA)**
- C. Recommended Overall Rate of Return**
  1. **Stipulated Cost of Common Equity**
  2. **Cost of Common Equity Should Commission Decline to Adopt Stipulation in its Entirety**

**V. COST OF SERVICE**

- A. Resolved/Uncontested Issues**
  1. **Use of AIC's Cost of Service Study (but for V.B.1.)**
  2. **Allocation of Underground Storage Assets**
  3. **Rate Zone Allocation of Plant Additions after September 30, 2010**
- B. Contested Issues**
  1. **Allocation of Demand-Related T&D Costs**

IIEC and AIC disagree about which method should be used to allocate demand-related transmission and distribution ("T&D") costs. AIC proposes use of the Peak-and-Average method to allocate T&D main costs among the various rate classes. (AIC IB, 105). This allocation method is a combination of the Design Day demand and Average demand, which is a function of customer class annual usage. Id. IIEC, on the other hand, argues that use of the Design Day Method alone is the most appropriate cost of service allocation method for T&D main costs and recommends the Commission adopt this approach. (IIEC IB, 3-15.)

AIC details the advantages of the Peak-and-Average Method over the Design Day method proposed by IIEC at length in its Initial Brief. (AIC IB, 105-113.) As discussed more fully in Staff's Initial Brief, Staff does not object to the Peak-and-Average method. (Staff Ex. 4.0, 10.) and recommends the Commission adopt the Peak-and-Average method to allocate demand-related T&D costs. The Peak-and-Average approach is the same methodology used and approved by the Commission in AIC's previous gas rate cases, Docket Nos. 13-0192 and 11-0282, which allocated T&D costs using a combination of Design Day Demand and Average Demand. Id. at 9.

## **VI. REVENUE ALLOCATION**

### **A. Resolved/Uncontested Issues**

#### **1. Rate Mitigation**

### **B. Contested Issues (NA)**

## **VII. RATE DESIGN**

### **A. Resolved/Uncontested Issues**

#### **1. Rate Uniformity**

#### **2. Charges for GDS-3, GDS-4, and GDS-5**

#### **3. Space Heat Study (contingent upon VII.B.1.)**

### **B. Contested Issues**

#### **1. Use of Straight Fixed Variable (SFV) Design / Setting the Customer Charge in GDS-1 and GDS-2**

Staff recommends the Commission reduce the Customer Charge to recover 70% of the revenues required for both the GDS-1 and GDS-2 customer classes instead of the 80% recovery of revenues required proposed by Ameren. (Staff IB, 43.) The AG, however, supports a proposal which would result in further reducing the Customer Charge

to recover only 54% of the revenues required for the residential class. (AG IB, 61.) AG witness Rubin proposes rates for the GDS-1 customer class based on the Cost of Service Study (“COSS”). (AG Ex. 3.0, 30.) Those rates have the effect of reducing the Customer Charge from 80% of the revenues required to approximately 54% of the revenues required. Id. at 20-21. As discussed more fully in Staff’s Initial Brief, the Commission should adopt Staff’s recommendation rather than that of the AG.

The AG takes issue with Staff’s position that the Commission should not set the Customer Charge based on the COSS at this time because that could result in rate shock for higher use customers. (AG IB, 78.) Further, the AG argues that Staff never analyzed what would constitute rate shock for a higher use customer. Id. To the contrary, Staff did perform such an analysis. (Staff Ex. 4.0; Staff Ex. 4.0, Schedule 4.02.) In fact, as can be seen in Staff Ex. 4.0, Schedule 4.02, a customer using 250 to 300 therms in a billing cycle will see increases of \$9.68 to \$12.24 under Staff’s proposal compared to the Company’s proposal. (Staff IB, 43.) These increases are 19.24% to 22.08% over the AIC’s proposal. Id. As explained in Staff’s rebuttal testimony, these increases in customer bills would be in addition to an overall increase to the revenue requirement. (Staff Ex. 10.0, 5.)

The AG’s proposed rate design would further reduce the Customer Charge to recover only 54% of the revenues required and would result in even greater increases per billing cycle than increases under either Staff or Company proposals. Id. Any such increase would be in addition to an overall increase to the revenue requirement. Although the increase to the revenue requirement is unknown at this time, the Commission should consider both the bill impact of the reduction to the Customer Charge and the overall

increase to the revenue requirement when determining if the potential exists for rate shock for higher use customers within the residential class.

Staff agrees that high Customer Charges undermine the public policy objective of reducing natural gas usage through reduction of the Distribution Delivery Charge, the part of the customer bill that can be reduced by the customer through conservation and energy efficiency. (Staff IB, 42.) Staff recommends, however, that the Commission gradually work toward achieving the goal of allocating only the customer component costs determined by the COSS to the Customer Charge rather than implementing the entire change in a single rate case. Id. at 43. A further reduction to the Customer Charge from Staff's proposal of 70% of the revenues required to the 54% advocated by the AG could result in rate shock for higher use customers. Therefore, the Commission should accept Staff's proposal to gradually reduce the Customer Charge and set the Customer Charge to recover 70% of the revenues required for the residential class.

## **VIII. OTHER RIDER AND TARIFF CHANGES**

### **A. Resolved/Uncontested Issues**

- 1. Rider VBA**
- 2. Uncollectibles – Rider GUA**
- 3. Uncollectibles – Rider S**

### **B. Contested Issues**

- 1. Implementation of Small Volume Transportation (SVT) Program**

As noted by Staff in its Initial Brief (Staff IB, 45) and Ameren in its Initial Brief (AIC IB, 127), the Commission has ordered workshops concerning Ameren's SVT program in

its Final Order in Docket No. 14-0097. Staff agrees with Ameren that the Commission need not make any decisions on this topic in this docket.

## **2. Enrollment Rescission for Rider T Customers**

Ameren currently has a uniform rescission period of ten days for all transportation customers, regardless of size. Staff and ICEA/RESA recommend that Ameren change its tariffs back to its previous practice, currently followed by Nicor Gas, Peoples Gas and North Shore Gas, of allowing rescission for only those transportation customers using less than 5,000 therms. AIC is opposed to this change.

Ameren justifies its current tariffs by arguing that the current provision reduces confusion. Id. at 132. Staff agrees that it may not always be entirely easy to determine whether some customers are small (i.e., usage less than 5,000 therms per year). Id. at 135. However, Staff believes confusion is also created by Ameren's careful distinction between enrollment rescission and supply rescission. As defined by the Company, enrollment rescission, available under Rider T to all customers, simply cancels the switch to a Rider T supplier. A supply rescission, on the other hand, cancels the switch as well as the supply contract. Id. at 130. If a given customer's status as a Small Commercial Customer is unclear, then whether a rescission pursuant to Section 19-115(g)(7) of the Act is available to that customer is also unclear. A customer's decision about whether or not to rescind may depend on what it perceives to be its status. By Ameren's own argument, having two types of rescission may create confusion for its customers.

Ameren notes that, while Section 19-115 does not mandate rescission periods for non-Small Commercial Customers, the Commission nevertheless has the power to allow them. Id. at 132. Staff does not disagree. This does not change the fact that customers

are not generally treated the same unless the customers have similar characteristics. For example, different classes of customers have different rates of return and are charged different rates.

Staff and ICEA/RESA argue that the ten-day rescission window for customers with usage greater than 5,000 therms could raise retail gas prices. (Staff IB, 47; ICEA/RESA IB, 5.) Ameren counters that possibility by noting that the argument is theoretical and not empirical. (AIC IB, 136.) Ameren argues that the rescission period may actually lower gas prices by increasing customers' assurance that they can cancel contracts within ten days. In other words, Ameren suggests that an increase in the demand for a good, in this case retail gas supply, implies a decrease in its price. This is incongruous with standard demand and supply theory that suggests an increase in demand will result in an increase in price. Staff continues to argue that retail gas prices could rise in response to the risk that longer-term contracts with a ten-day rescission window impose on suppliers. This conclusion is based on sound theory, and Ameren has not successfully countered it.

Ameren argues that the increased risk that the ten-day rescission window imposes on Rider T suppliers is entirely theoretical. Ameren further points out that neither ICEA/RESA nor Staff identify a result where a non-Small Commercial Customer rescinded a contract and imposed losses on a supplier. Id. at 134. Regardless, suppliers must remain cognizant of this risk as they plan their offers. (ICEA/RESA IB, 7-8.) It is entirely reasonable for the Commission to take this increased risk into account when making their decision.

### **3. Combined Billing Practices for Electric and Gas Customers**

Ameren and ICEA/RESA do not appear to be addressing the same issue in the respective sections of their initial briefs. Ameren is almost entirely concerned with Utility Consolidated Billing (“UCB”), in which it bills for its delivery charges along with the suppliers’ commodity charges. (AIC IB, 139-140.) It also extensively discusses “bill-splitting.” Id. at 138. ICEA/RESA, on the other hand, raised the billing issue in its testimony and is wholly focused on the Single Bill Option (“SBO”). (ICEA/RESA IB, 10-11.) SBO allows the supplier to include Ameren’s delivery charges in the bill that the supplier sends to the customer.

ICEA/RESA complain that Ameren changed its practices by only permitting one SBO provider for both electric and gas customers, rather than allowing each supplier to send a separate bill. Id. Ameren denies it changed its procedures in the way asserted by ICEA/RESA. (AIC IB, 137-138.) ICEA/RESA is concerned that a SBO for both gas and electric service can leave one supplier vulnerable to revealing its pricing information. Staff argued that customers’ preferences should govern billing practices, as long as costs are not excessive. (Staff IB, 47-48.)

### **4. Meter Reading and Billing Practices for Rider T Customers**

ICEA/RESA requests that the Commission establish the fifth business day of the month as the firm date on final usage, and that the Commission order Ameren to provide a standard notice, other than the invoice itself, for usage revisions. (ICEA/RESA IB, 16.) It is unclear how widespread the problem is, and there is no allegation that Ameren has violated its tariffs, its contracts with suppliers, Commission rules or Illinois law. Staff

maintains that ICEA/RESA has not sufficiently supported the need for Commission action.  
(Staff IB, 49.)

**IX. OTHER ISSUES**

**A. Resolved/Uncontested**

**1. General Services Agreement Allocators**

**B. Contested Issues**

**1. Forecasted FERC Account Data**

**X. CONCLUSION**

Staff respectfully requests the Illinois Commerce Commission approve its recommendations in this docket.

Respectfully submitted,

/s/

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October 1, 2015

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