

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY)	
d/b/a Ameren Illinois,)	
Petitioner)	
)	Docket No. 15-0305
Rate MAP-P Modernization Action Plan-)	
Pricing Annual Update Filing.)	

BRIEF ON EXCEPTIONS OF THE STAFF OF THE
ILLINOIS COMMERCE COMMISSION

John L. Sagone
James V. Olivero
Office of General Counsel
Illinois Commerce Commission
160 N. LaSalle St., Suite C-800
Chicago, IL 60601
Phone: (312) 793-2877
Fax: (312) 793-1556
jolivero@icc.illinois.gov
jsagone@icc.illinois.gov

November 20, 2015

*Counsel for Staff of the
Illinois Commerce Commission*

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

AMEREN ILLINOIS COMPANY)	
d/b/a Ameren Illinois,)	
Petitioner)	
)	Docket No. 15-0305
Rate MAP-P Modernization Action Plan-)	
Pricing Annual Update Filing.)	

BRIEF ON EXCEPTIONS 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 200.830 of the Rules of Practice of the Illinois Commerce Commission (“Commission”) (83 Ill. Adm. Code 200.830), and the schedule set by the Administrative Law Judge (“ALJ”), respectfully submit their Brief on Exceptions (“BOE”) to the Proposed Order (“ALJPO”) issued by the ALJ on November 10, 2015.

I. INTRODUCTION

Initial Briefs (“IBs”) were filed on October 6, 2015 by Ameren Illinois Company d/b/a Ameren Illinois (“AIC” or “Ameren” or “Company”), the Citizens Utility Board (“CUB”) and the Illinois Industrial Energy Consumers (“IIEC”) (together, “CUB/IIEC”), the People of the State of Illinois (“AG”), and Staff. Reply Briefs (“RBs”) were filed by Staff, Ameren, CUB/IIEC, and the AG on October 16, 2015. The AG filed a corrected IB and RB on October 19, 2015. The ALJ issued an ALJPO on November 10, 2015.

The PO reviews the issues presented in this proceeding in a clear and concise manner, is well written, and reflects the positions taken by Staff, the Company, and the

intervening parties. Staff supports the PO's conclusions, and takes no exception to the ALJPO.

II. CONCLUSION

WHEREFORE, for all of the reasons set forth in Staff's Initial Brief, Reply Brief, and this BOE, Staff respectfully requests that the Commission's Order in this proceeding reflect all of Staff's recommendations regarding AIC's request for approval of its updated cost inputs for its Modernization Action Plan – Pricing tariff, Rate MAP-P and corresponding new charges.

November 20, 2015

Respectfully submitted,

JOHN L. SAGONE
JAMES V. OLIVERO
Staff Counsel

JAMES V. OLIVERO
Office of General Counsel
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
Phone: (217) 785-3808
jolivero@icc.illinois.gov

JOHN L. SAGONE
Office of General Counsel
Illinois Commerce Commission
160 North LaSalle St., Suite C-800
Chicago, IL 60601
Phone: (312) 792-2877
jsagone@icc.illinois.gov