

BEFORE THE
STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

SOUTH BELOIT WATER, GAS and ELECTRIC COMPANY	
Re: Delivery Services Tariffs submitted pursuant to Section 16-104 and Section 16-108 of the Illinois Public Utilities Act	Docket No. 01-0629

REBUTTAL TESTIMONY OF

Brian E. Penington

FOR

South Beloit Water, Gas and Electric Company

Exhibit _____ BEP-2/4

December 10, 2001

SB

01-0629
2.4

1/3/02

1 Q. Please state your name and business address.

2 A. My name is Brian E. Penington and my business address is, P.O. Box 192, 222
3 West Washington Avenue, Madison, Wisconsin 53701-0192.

4 Q. By whom are you employed?

5 A. I am employed by Alliant Energy Services Company, Inc. as a Regulatory Pricing
6 Analyst.

7 Q. Did you previously provide direct testimony regarding South Beloit Water,
8 Gas and Electric Company's (SBWGE) delivery service implementation plan
9 and delivery service tariff in in this docket.

10 A. Yes I did.

11 Q. What is the purpose of your rebuttal testimony?

12 A. The purpose of my rebuttal testimony is to respond to the direct testimony by ICC
13 Staff Witness Eric P. Schlaf in this docket. Specifically, I would like to address
14 the following recommendations contained in his testimony:

15 1) Suppliers signing customers to electric supply contracts should be
16 permitted to use electronic signatures to satisfy the "verifiable
17 authorization" requirements described in Section 16-115A(b) of the
18 Public Utilities Act ("Act").

19 2) Customers should not be held responsible for a supplier's failure to pay
20 the customer's delivery services charges to the delivery services
21 provider - SBWGE.

22 ELECTRONIC SIGNATURES

23 **Q. Does SBWGE agree with Mr. Schlaf in regards to the addition of electronic**
24 **signatures for satisfying Letter of Agency requirements?**

25 A. Yes. SBWGE believes that suppliers signing customers to electric supply
26 contracts should be permitted to use electronic signatures as described in Mr.
27 Schlaf's testimony. This proposal is acceptable to SBWGE with the
28 understanding that this does not require SBWGE to operate or obtain systems that
29 are capable of accepting electronic signatures.

30 **Q. Why is SBWGE concerned about being required to process electronic**
31 **signatures?**

32 A. SBWGE does not currently have the capability to process electronic signatures.
33 SBWGE is concerned with any suggestion or recommendation that would require
34 it to make the substantial investment in infrastructure needed to process electronic
35 signatures; especially considering the size of its customer base.

36 **CUSTOMER RESPONSIBILITY FOR SUPPLIER FAILURE TO PAY**

37 **Q. Do you have any comments regarding Mr. Schlaf's objection to SBWGE's**
38 **request to disconnect customers of a Retail Electric Supplier (RES) electing**
39 **the single bill option if the RES does not provide payment to SBWGE for the**
40 **customer's delivery services charges?**

41 A. SBWGE is willing to accept his recommendation that this authority not be
42 included in SBWGE's residential delivery services tariff.

43 **Q. Does this conclude your rebuttal testimony?**

44 A. Yes, it does.