

Central Illinois Light Company

ICC Docket No. ~~01-0267~~⁰²⁻⁰¹⁶⁷
 Response to Staff Data Request BCS-001 – BCS-025

Item BCS-007: This request concerns “affiliated interests” as defined in Section 7-101 of the Illinois Public Utilities Act.

- a. Provide a list of the persons or corporations that are “affiliated interests” of the company.
- b. Itemize expenditures made by the Company during the reconciliation period directly to any “affiliated interests” for any environmental activities including the investigation and remediation of the residues from MGP operations.
- c. Itemize expenditures made by the Company during the reconciliation period indirectly to any “affiliated interests” for any environmental activities including the investigation and remediation of the residues from MGP operations.
- d. Provide the Docket Number and Order date for the Illinois Commerce Commission Order(s) approving the “affiliated interests” transactions described in parts b and c.

Response:

- a. The list of known and potential “affiliated interests” of the Company and the Company's parent, CILCORP, as of December 31, 2001 is set forth in the attached Exhibit. The AES Corporation is the parent company of CILCORP. AES has hundreds of subsidiaries. Because of the confidential nature of AES's business structure, CILCO will make the list of AES subsidiaries available to staff members for review onsite.
- b. No expenditures were made by the Company during 2001 directly to any of the affiliated interests for any environmental activities relating to MGP operations.
- c. No expenditures were made by the Company during 2001 indirectly to any of the affiliated interests for any environmental activities related to MGP operations.
- d. None.

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OFFICIAL FILE
 ILL. C. C. DOCKET NO. 02-0167
 CILCO Exhibit No. 3.0
 Witness _____
 Date 8/22/02 Reporter CB

Affiliated Interests

(INFORMATION SUBMITTED UNDER SEAL)

Central Illinois Light Company

ICC Docket No. 02-0167

Response to Staff Data Request BCS-001 - BCS-025

Item BCS-016: How many manufactured gas plant sites located in the State of Illinois does the Company own or is responsible for in Illinois?

Response: It appears that CILCO is responsible for four Manufactured Gas Plant Sites in the State. Two sites have already been remediated, those being MacArthur Boulevard in Springfield and Persimmon Street in Peoria. A third, in Pekin, Illinois is currently being investigated. The fourth is a site CILCO never owned or operated, but was operated by a company CILCO purchased in the 1930's. That site is also in Springfield. CILCO has not yet begun to investigate that site. Please see response to Item BCS-001.

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Central Illinois Light Company**ICC Docket No. 02-0167****Response to Staff Data Request BCS-001 – BCS-025**

Item BCS-017: Please provide an estimate of the total cost the Company expects to incur to remediate all of its manufactured gas plant sites. Identify what portion of the total estimated cost has been actually incurred at December 31, 2001.

Response: Through the end of 2001, CILCO has spent a total of \$7,928,400.86 on coal tar related costs, including legal fees.

Although remediation is complete at the Persimmon and MacArthur sites, remediation at the Pekin site will probably not be completed until 1st quarter of 2003. We have budgeted \$300,000 for remediation of the site but at this time we cannot determine if further expenses will be incurred for on-going groundwater monitoring. Further investigation at the 1st and Washington site in Springfield will begin when remediation of the Pekin site is complete. At this time any estimation of expenses related to that site would be speculation. Therefore it is not possible to make a relevant estimate of total remediation costs.

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Item BCS-018: **When does the company anticipate that remediation of its Illinois manufactured gas plant sites will be completed?**

Response: Remediation is complete at the Persimmon site and the MacArthur site. Groundwater monitoring continues at the MacArthur site until contaminate levels fall below those required in the NFR letter. Remediation at the Pekin site is expected to be completed fourth quarter 2002 or first quarter 2003. CILCO does not own the property at this site and remediation efforts will have to be coordinated with the City of Pekin, the current owner of the property. The final site CILCO has responsibility for at First and Washington in Springfield will enter the investigation phase when work is completed at the Pekin site. At this time any estimate for the completion of the First and Washington site would be speculation, but 2006 seems like a reasonable date..

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CONFIDENTIAL

CENTRAL ILLINOIS LIGHT COMPANY

ICC Docket No. 02-0167

Response to Staff Data Request BCS-001 through BCS-025

Item BSC-019: How much has the Company recovered to date from insurance companies related to its manufactured gas plant sites?

Response: The Company has recovered to date from inception \$ [REDACTED].

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CENTRAL ILLINOIS LIGHT COMPANY

ICC Docket No. 02-0167

Response to Staff Data Request BCS-001 through BCS-025

Item BCS-020: What portion of the insurance proceeds recovered to date have been refunded to ratepayers or used to reduce the manufactured gas plant sites remediation costs recovered from ratepayers?

Response: The full amount of the refunds have been flowed back to the ratepayer, through the coal tar rider.

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CENTRAL ILLINOIS LIGHT COMPANY

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Item BCS-021: What is the total amount of interest charges the Company has collected from customers related to the cleanup of manufactured gas plant sites?

Response: The Company has not accrued any interest charges on the cleanup costs of manufactured gas plant sites since the inception of the rider. The Company was permitted to accrue interest on deferred costs prior to the inception of the rider and that amount (\$59,868) was recovered in the first year of the rider (1991).

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CENTRAL ILLINOIS LIGHT COMPANY

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Item BCS-022: How much of the total amount interest identified in response to question BCS-021 was collected during the current reconciliation period?

Response: Not Applicable.

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Central Illinois Light Company

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Item BCS-023: Please describe the types of technology the Company employs to remediate its manufactured gas plant sites.

Response: The company has used the following remediation technologies: Excavation and off-site treatment and/or disposal, groundwater collection and discharge to POTW (Publicly Owner Treatment Works), engineered barriers (pavement caps, etc.), institutional controls (restriction of potable water use, restriction of land use to industrial/commercial).

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Item BCS-024: Is the Company familiar with the microbe cleanup technology developed by the Gas Technology Institute?

Response: The Company depends upon our consultant to recommend the best solution based upon information collected during investigation of the site. Our consultant is familiar with bioremediation techniques. They are currently working on projects for other companies which include the application of microbes and oxygen-enhancing products.

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**Item BCS-025: Has the Company employed the Gas Technology Institute's
microbe technology to remediate any of its manufactured gas
plant sites?**

Response: No, The Company has not employed the Gas Technology Institute's microbe technology to remediate any of its manufactured gas plant sites. The IEPA has required CILCO to remove the source material from the sites. Therefore current remediation plans are to dig and remove the material to meet their request. If excavation does not accomplish remediation objectives, perhaps because the extent of excavation was limited by the streets or other conditions, we may resort to in-situ bioremediation technology to polish off the remaining contaminants. We do not foresee that bioremediation will be our primary remediation technology.

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