



June 9, 2014

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Illinois Commerce Commission
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Mr. Schlaf,

With the exception of the single suggestion presented below, Ameren Illinois Company d/b/a Ameren Illinois ("Ameren Illinois") has no comment on the draft revisions to Illinois Administrative Code Part 465, dated May 13, 2014. We do, however, offer one suggested addition to Section 465.50(b)(C). Section 465.50(b), as revised in the draft dated May 13, 2014, reads as follows:

Section 465.50 Electricity Provider Billing for Eligible Customers

- b) Billing for non-competitive customers taking electric supply service under time of use rates and whose delivery services are charged on a kilowatt-hour basis
 - A) The electricity provider shall determine whether each customer is a net purchaser of electricity or a net seller of electricity during each discrete time period for which the tariffed or contract rate, as appropriate, is applicable. To the extent the electric utility is not the electricity provider, the electric utility may make its own determination as to whether each customer is a net purchaser of electricity or a net seller of electricity during each discrete time period for the purposes of determining delivery services charges and credits.
 - B) For the discrete time periods in which the customer is a net purchaser of electricity, the electricity provider shall charge the customer for the net electricity supplied to and used by the customer according to the terms of the contract or tariff to which the same customer would be assigned to or be eligible for if the customer was not a net metering customer.
 - C) For the discrete time periods in which the customer is a net seller of electricity, the customer shall receive a monetary credit from the electricity provider that consists of an energy credit and a delivery credit. The energy credit for a discrete time period is determined by multiplying the net electricity supplied during the discrete time period by the same price per kilowatt-hour as the electric service provider would charge for kilowatt-hour energy sales during that same time period. The delivery credit is determined by multiplying the net electricity supplied during the discrete time period by a credit that reflects all kilowatt-hour based electricity charges applicable to the customer electric service rate, excluding energy charges, for that discrete time period. When eligible customers receive service under an electric utility's bundled service rates, the monetary credit shall be equal to the applicable kilowatt-hour based bundled service charges, multiplied by the net electricity supplied over the billing period. In the event that the electricity provider is not the electric utility, the monetary credit for delivery services shall be provided by the electric utility.

- D) The electric utility shall provide interval meter data to the customer's electricity provider.
- E) Customers remain responsible for all taxes, fees, and utility delivery charges that would otherwise be applicable to the net amount of electricity used by the customer.

Ameren Illinois recommends that Section 465.50(b)(C) be revised as follows, in order to clarify that monetary credits received in discrete time periods during which a customer is a net seller of electricity may not be carried forward to subsequent billing periods:

- C) For the discrete time periods in which the customer is a net seller of electricity, the customer shall receive a monetary credit from the electricity provider that consists of an energy credit and a delivery credit. The energy credit for a discrete time period is determined by multiplying the net electricity supplied during the discrete time period by the same price per kilowatt-hour as the electric service provider would charge for kilowatt-hour energy sales during that same time period. The delivery credit is determined by multiplying the net electricity supplied during the discrete time period by a credit that reflects all kilowatt-hour based electricity charges applicable to the customer electric service rate, excluding energy charges, for that discrete time period. When eligible customers receive service under an electric utility's bundled service rates, the monetary credit shall be equal to the applicable kilowatt-hour based bundled service charges, multiplied by the net electricity supplied over the billing period. In the event that the electricity provider is not the electric utility, the monetary credit for delivery services shall be provided by the electric utility. In no instance shall any excess credits be applied to future billing periods.

Ameren Illinois does not view this recommendation as to alter the intent of the rule, but rather to expressly state what is already implied. Ameren Illinois has received inquiries from customers about the potential carryover of excess credits and believes that the suggested addition will help provide additional operational clarity and express direction in the face of future customer inquiries.

As always, please do not hesitate to contact us should you have any questions.

Sincerely,



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cc: Corporate File