

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION :
On Its Own Motion :
: 11-NOI-01
Notice of Inquiry into the implementation :
of Public Act 97-0222 :

**AMEREN ILLINOIS COMPANY'S
RESPONSE TO NOTICE OF INQUIRY**

The NOI solicits the following questions from interested persons and entities:

1. Is there a need for the Commission to update existing consumer education information for residential and small commercial customers? Please provide specific examples of information that is no longer accurate or that is not complete in its explanation of a particular issue.
2. If a commenting party is of the opinion that certain information requires updating, provide proposed language. As an electric public utility, the Ameren Illinois Company is an interested entity with regard to the subject matter of the NOI, which implicates information concerning alternative electric utility supply to Ameren Illinois customers.

Question #1 – Need to Update Commission Education Information

The Commission's online materials as presented on its www.PluginIllinois.org website are currently sufficient, but it can be said that there is an ongoing a need to monitor and adjust education materials in order to keep the information presented relevant to new developments and trends in the market place. Presently, the issues of consolidated billing, municipal aggregation, and advances in small customer choice are timely, and as such, customers will likely be seeking increased educational information concerning these topics.

Presently, the AIC is satisfied that the Office of Retail Market Development is competently handling these topics through collaboration with effected stakeholders. Clearly, progress on matching educational needs to the issues facing consumers is being made. The Commission should continue to encourage stakeholder participation in the development of educational materials. Further, it is understood that the ORMD will be providing the public with information regarding customer complaints for RES and the AIC has some limited comments with regard to that presentation.

AIC has three specific concerns it believes should be addressed by the Commission with regards to : (1) Percentage of Income Payment Plan customers and switching; (2) the manner in which complaint ratios are calculated; and (3) annualized price to compare information for AIC.

AIC is concerned about certain unintended consequences related to Percent of Income Payment Plan (“PIPP”) eligibility and third party supply to low income residential customers. PIPP is an important program that provides assistance to low income customers. Low income residential customers could potentially lose PIPP eligibility if they enroll with a RES supplier. Involuntary switching pursuant to municipal aggregation is particularly problematic. The AIC believes more information should be presented to municipalities contemplating municipal aggregation to avoid complications in an effort to provide full disclosure and the potential loss of low-income benefits to certain municipal residents when considering the selection of a RES. AIC is proposing the following notation, or something similar to be placed on the PlugInIllinois.org website and attached to other relevant materials on the “municipal aggregation” page as follows:

“In planning for a municipal aggregation referendum and subsequent switch, Customers, Municipalities, and RESs should consider and discuss a plan to avoid the unintended interference with customer participation in a “Percent of Income Payment Plan” where certain qualifying customers

receive a lower payment matched to their income level. For more information, please contact [Insert Applicable Contact Info]”

Additionally, the AIC has no opinion as the mode or manner of the presentation of information concerning RES complaints, although believes a visual representation of the data versus a numeric quantification may be easier for consumers to interpret. However, the AIC does wish to point out that it believes the calculation provided in the excel spreadsheet included a calculation error with regard to the options #2 and #3 under consideration. It appears that if the same input data is used for all three options, then the relative rank of the eight ARES should be the same in the six-month average. A corrected spreadsheet is attached for the NOI manager’s consideration.

Finally, in the spirit of full consumer disclosure, the AIC believe the website should provide the Ameren Illinois annual prices so that they can be compared to the RES’s 12 and 24 month offers. At present, the Ameren Illinois information that is displayed only reflects the current season and does not reflect an appropriate basis for switching comparisons when evaluated only seasonally against 12 to 24 month RES offers. The AIC would propose the word “Annualized” be used in the description of the rates provided, and the rates stated would provide arithmetic annualized rates blending seasonal rates for comparison purposes, or otherwise provide both current and annualized rates together.

AIC appreciates the opportunity to provide comments in response to the Commission’s Notice of Inquiry and looks forward to continued progress on these important issues.

Dated: December 1, 2011

Respectfully submitted,

AMEREN ILLINOIS COMPANY
d/b/a Ameren Illinois

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