



## **CITIZENS UTILITY BOARD**

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March 9, 2012

### **VIA EMAIL**

Mr. Eric Lounsberry  
Engineering Department  
Illinois Commerce Commission  
527 E. Capital Ave.  
Springfield, IL 62701

### **RE: INITIAL COMMENTS TO FIRST DRAFT OF PROPOSED PART 500 REWRITE**

Dear Eric,

The following are the initial comments of the Citizens Utility Board (CUB) concerning the January 31, 2012 draft of the Part 500 Rewrite. CUB reserves the right to make comments on these or subsequent drafts. CUB proposes an addition to Section 500.40 Complaints to provide the Commission with annual aggregated data on utility and Alternative Gas Supplier (“AGS”) complaints. Proposed is a new subsection (d) which would read as follows.

d.) On or before March 1 of every year, a utility or Alternative Gas Supplier shall file a report with the Chief Clerk of the Commission for the preceding calendar year on its complaint rate. When a utility or Alternative Gas Supplier files its report with the Commission, it shall also provide a copy of its report to the Manager of the Consumer Services Division.

This section mirrors the language in Part 500.50(d) and would therefore provide symmetry with Part 500.50. This is important because each of these sections concern reporting regarding the customer experience of the utility or ARG. CUB believes that such an addition would serve the Commission well in detecting complaint trends and will help to identify utilities and Alternative Gas Suppliers that may not be performing up to customers’ – or the Commission’s – expectations. Such a report would not be overly burdensome on the party required to provide such a report.

Yours sincerely,

Julie L. Soderna  
Director of Litigation