Data Request No.: SWEC 3-1

Please refer to the response to SWEC 1-1. Please provide a copy of MISO's review of Ameren's 2015 Actual Attachment O upon receipt from MISO.

**RESPONSE**

On September 13, 2016, AIC received review questions from MISO regarding the 2015 Actual Attachment O. Ameren submitted responses on September 21, 2016. See Attachment SWEC 3-1 for the review questions and responses. There were no changes as a result of MISO’s review. MISO has not yet communicated that they have completed their review.
Data Request No.: SWEC 3-2

Please refer to the response to SWEC 1-3 in which Ameren claimed that providing “workpapers for Attachment O which have not been provided with Attachment O” would be burdensome and refused to provide these workpapers. Section E 3 of Ameren's Protocols commits it to:

[p]rovide the formula rate calculations and all inputs thereto, as well as supporting documentations and workpapers for data that are used in the Annual True-Up that are not otherwise available in FERC Form No. 1.

SWEC did not request that Ameren provide all the data required to be provided under Section E 3 of Ameren’s protocols. Rather, it requested only "workpapers" showing Ameren's calculations of the amounts used in Attachment O which have not been provided with Attachment O. Please provide the requested workpapers.

**RESPONSE**

The workpapers used in the Annual True-Up were all included in the 2015 True up file that was posted on Oasis on June 1, 2016 which can be accessed at [http://www.oasis.oati.com/AMRN](http://www.oasis.oati.com/AMRN). Refer to the tabs that begin with "WP". All of the items in the AIC Attach O tab that are not taken directly from the AIC 2015 FERC Form 1 are linked to the work paper tabs.
Please refer to the response to SWEC 1-4(a).

(a) Will Ameren refund all of the CIAC to the transmission customers? If not, please explain the answer and provide the amount that will not be refunded.

(b) Is the balance of $7,891,068 net of $3,267,838?

**RESPONSE**

(a) Ameren does not understand why CIAC payments would be refunded back to customers. CIAC payments are used to fund construction of a project to be recorded in plant books at zero costs. To the extent CIAC payments are made in advance of construction and actual costs are less than expected, any over-payment would be refunded.

(b) No, as stated in our response to SWEC 1-4a, the $7,891,068 includes the $3,267,838.
In response to SWEC 1-4(b), Ameren stated that CIAC-funded facilities are installed at the customer’s request. In response to SWEC 1-4(c), Ameren stated that it includes CIAC funded facilities in rate base at zero cost. In view of these responses, please provide reasons for including CIAC-related ADIT in rate base and requiring all customers, including those who may not benefit from the CIAC-funded facilities, pay a return on this ADIT amount.

**RESPONSE**

Ameren followed the formula in the tariff for ADIT. Refer to paragraph 37 of the Order on Docket No. ER16-1169-000 issued September 22, 2016 which states that the Ameren Illinois' Attachment O formula rate specifically requires that the average of the total FERC Form No. 1 reported beginning and ending balances for Account 282 are allocated to the transmission function using the Net Plant allocator.
Please refer to the response to SWEC 1-4(d).

(a) Are the ADIT balances shown negative or positive amounts?

(b) Do the ADIT balances shown in response to SWEC 1-4(d) result in reducing or increasing the ADIT balances shown in WP3 to Attachment O?

(c) Please explain the note that appears at the end of the response that “the above CIAC balances are cumulative.”

(d) Please provide the total amount of CIAC Income Tax Gross-Ups recovered during 2015 and the amount booked to Account 417.009. If these two amounts are different, please explain the difference. Also, provide the amount used as a revenue credit included in Ameren's 2017 Update filing and indicate where it is included in Attachment O for 2017 Update. If this credit is not included, please indicate the amount of credit and when it would be included in the 2017 Update.

RESPONSE

a) The CIAC ADIT balances as shown in SWEC 1-4(d) are positive (debit) balances.

b) The CIAC ADIT balances as shown in SWEC 1-4(d) result in a reduction to the 282 ADIT balances.

c) The note in SWEC 1-4(d) that states “the above CIAC balances are cumulative” means the balances not only include 2015 activity but include prior years’ activity as well.
Data Request No.: SWEC 3-6

Please refer to the response to SWEC 1-5. SWEC 1-5 indicates that Acct. 242 “does not include ADIT.” Please provide the details of amounts booked to Acct. 242 as of December 31, 2014 and December 31, 2015 in similar format to the data provided in response to the SWEC’s data request SWEC 2-7 related to the 2016 Projection. The attachment to the response is entitled “SWEC 2-7 Attach Major 242 2016P” and is available at this link: http://www.oasis.oati.com/woa/docs/AMRN/AMRNdocs/SWEC_2-7_Attach_Major_242_2016P_posted_12_21_15.pdf

**RESPONSE**

See attached file SWEC 3.6 Attach.
Ameren Illinois Company's  
Response to SWEC Data Request – Set 3  
2015 AIC Attachment O True-up

Data Request No.:  SWEC 3-7

Please refer to SWEC 1-5 Attach 1.

(a)  Acct 190 ADIT includes two amounts related to Pension Expense Allowed/Disallowed. Please provide the following information related to these two amounts:

(i)  Provide separately the amounts related to Allowed and Disallowed.

(ii)  Please identify the entity that allowed and/or disallowed the Pension Expenses.

(iii)  Did Ameren recover the allowed and disallowed pension expenses from its customers? If the answer is no, please describe the source of these amounts.

(b)  This Attachment shows two Acct 282 ADIT amounts related to Temporary Difference CWIP and two amounts related to ADIT Reg Liab – AFUDC Equity CWIP. Please provide the following information related to these amounts:

(i)  Please identify the portion of these amounts that are related to CWIP that Ameren has ever included in rate base in Attachment O. Also, indicate the time period when such CWIP was included in Attachment O.

(ii)  Are the AFUDC amounts related to the same CWIP for which the Temporary Difference amounts are included in SWEC Attach 1-5?

(c)  Please explain the nature of the following amounts booked to Acct 282:

7 - Active VEBA  
7 - Active VEBA  
120 - Increase/Decrease Injuries & Damages Reserve  
120 - Increase/Decrease Injuries & Damages Reserve  
130 - Increase/Decrease Legal Expense Reserve
130 - Increase/Decrease Legal Expense Reserve
640 - Over/Under Accrual State Income Tax
641 - Over/Under Accrual Gross Receipts Tax
641 - Over/Under Accrual Gross Receipts Tax
643 - Over/Under Accrual Property Tax
643 - Over/Under Accrual Property Tax
900 - Vacation Pay Adjustment
900 - Vacation Pay Adjustment

(d) Is it correct that the ADIT amounts listed in (c) above resulted from the fact that Ameren collected amounts in excess of the expenses actually incurred or the amounts allowed by IRS as deductions? If not, please explain the reasons for the above income tax liabilities.

(e) Please explain the nature of the following amounts booked to Acct 283:

750- Renewable Energy Compliance Cost
883- other Reg Asset/Liab (storm cost)

(f) Is it correct that all the costs listed in Part (e) above are related to Ameren’s retail electric business? If not, please explain the response.

RESPONSE

(a)(i) & (ii) The name of this Account in 190 ADIT may be misleading. The phrase “pension allowed/disallowed” refers to the fact that while pension expenses are accrued for financial statement purposes based on a number of factors like service cost, the amount deductible for income tax purposes in any given year is the amount of cash contributed to the pension fund in that year. The amounts in this account relate to the pension liability accrued on the financial statements that have not yet been deducted for tax purposes. No pension contributions have been disallowed as deductions by the Internal Revenue Service.

(iii) Yes. Pension expense is recovered from customers.

(b)
(i) As stated in the FERC Docket No. ER 16-1169, Paragraph 37, “Ameren Illinois, Attachment O formula rate specifically requires that the average of the total FERC Form No. 1 reported beginning and ending balances for Account 282 are allocated to the transmission using the Net Plant Allocator”.

(ii) Per FERC Order Docket No. ER16-1169-000, Part IV, B, 2, paragraph 19, the ADIT Reg Liab – AFUDC Equity CWIP will be excluded.
(c) See “SWEC 3-7 attachment” for the reasons for the difference in book/tax treatment and the related ADIT booked to Account 190.

(d) See “SWEC 3-7 attachment” for the reasons for the above ADIT assets and liabilities.

(e) See “SWEC 3-7 attachment” for the reasons for the difference in book/tax treatment and the related ADIT booked to Account 283.

(f) No. There are storm costs included in the regulatory asset/liability that pertain to transmission service.
Ameren Illinois Company's  
Response to SWEC Data Request – Set 3  
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Data Request No.: SWEC 3-8

Please refer to the response to SWEC 1-7.

(a) For each of the facilities listed in subpart (a) of the response, please indicate whether it is used exclusively for transmission service. If not, please indicate the additional function(s) that it serves.

(b) Please indicate whether there are similar facilities booked as General and/or Intangible Plant that are located at non-transmission related substations. If yes, please list these facilities and provide the net book values as of December 31, 2014 and December 31, 2015.

(c) Please provide all the documents used in support of the decision to transfer the listed facilities to Transmission Plant account.

RESPONSE

(a) Yes, the equipment, not facilities, listed in response to SWEC 1-7(a) are exclusively used for transmission.

(b) No. There is not similar equipment booked as General and/or Intangible Plant located at non-transmission related substations.

(c) This information has not been made available to the public in the detail requested, and Ameren Illinois could be harmed from a commercial and a security perspective if it were made public. As a result, Ameren Illinois is not posting this information for public review but instead will make it available in a separate attachment upon execution of a Non-Disclosure and Confidentiality Agreement.
Data Request No.: SWEC 3-9

Please refer to SWEC 1-8 Attachment (CONFIDENTIAL ATTACHMENT). Does any listed facility serve loads at a voltage less than 138 kV? If yes, please identify the facility and explain the reasons for including the cost as transmission plant.

**RESPONSE:**

All facilities listed on SWEC 1-8 Attachment are 138kV or above and are properly classified as transmission facilities.
Data Request No.: SWEC 3-10

Please refer to SWEC 1-9 Attachment (CONFIDENTIAL ATTACHMENT).

(a) [REDACTED]
(b) [REDACTED]
(c) [REDACTED]
(d) [REDACTED]
(e) [REDACTED]

RESPONSE:

This information has not been made available to the public in the detail requested, and Ameren Illinois could be harmed from a commercial and a security perspective if it were made public. As a result, Ameren Illinois is not posting this information for public review but instead will make it available in a separate attachment upon execution of a Non-Disclosure and Confidentiality Agreement.
Data Request No.: SWEC 3-11

Please refer to the response to SWEC 1-11(a) which states that “there is no ARO costs for transmission plant.” SWEC 1-5 Attachment 1 shows that Acct 190 ADIT includes two amounts related to ARO. Are these two amounts related to transmission plant? If yes, please reconcile the response with the response to SWEC 1-11(a). If no, please explain the reasons for including these non-transmission plant amounts in rate base.

**RESPONSE**

No. The response to SWEC 1-11(a) was correct that there is no ARO costs recorded in transmission plant accounts. The answer did not address any other non-transmission plant accounts. AIC is following its requirement to file rates based on the formula process approved by FERC. In FERC docket ER16-1169-000, the order explicitly states the formula rate requires Account 190 be allocated to transmission via the Net Plant allocator.
Data Request No.: SWEC 3-12

Please refer to the response to SWEC 1-11(b) concerning LHFFU. Please identify each of the parcels or plant that comprise the $2.4 million in LHFFU and provide a summary of the plan for future use of the parcel/plant and the anticipated date that the parcel/plant will begin providing service.

RESPONSE

See SWEC 3-12 Attach HC for information by parcels in response to SWEC 1-11(b). This attachment has not been made available to the public in the detail requested, and Ameren Illinois could be harmed from a commercial and a security perspective if it were made public. As a result, Ameren Illinois is not posting this information for public review but instead will make it available in a separate attachment upon execution of a Non-Disclosure and Confidentiality Agreement.
Data Request No.: SWEC 3-13

Please refer to the response to SWEC 1-5 Attachment 1.

In response to SWEC 1-14, In SWEC 1-5 Attachment 1, Ameren included the amounts for the following items.

<table>
<thead>
<tr>
<th>Account</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>ZA-190-CRD</td>
<td>Illinois Coal Credit Utilization</td>
</tr>
<tr>
<td>ZA-190-284</td>
<td>FIN 48 Liability</td>
</tr>
<tr>
<td>ZA-190-611</td>
<td>831-Regulatory Asset Amortization</td>
</tr>
<tr>
<td>ZA-190-611</td>
<td>140-Increase/Decrease Uncollectible Reserve</td>
</tr>
<tr>
<td>ZA-190-612</td>
<td>831-Regulatory Asset Amortization</td>
</tr>
<tr>
<td>ZA-282-125</td>
<td>ADIT Mixed Service Costs-Federal</td>
</tr>
<tr>
<td>ZA-282-126</td>
<td>ADIT Mixed Service Costs-State</td>
</tr>
<tr>
<td>ZA-283-651</td>
<td>Illinois Bad Debt Tracker</td>
</tr>
<tr>
<td>ZA-283-652</td>
<td>Renewable Energy Compliance Cost</td>
</tr>
</tbody>
</table>

Please describe the nature of and explain how any part of these items are related to and needed to provide transmission service. If any of these items is related to Retail business, please explain the reasons for including in the ATRR and explain the basis for inclusion in light of Ameren’s removal of Account 283 amounts related to distribution as discussed in the response to SWEC 1-14.

**RESPONSE**

See “SWEC 3-13 attachment” for the difference in book/tax treatment and the related ADIT booked to the Accounts listed above.

The Attachment O formula rate specifically requires that the average of the total FERC Form No.1 reported beginning and ending balances of these accounts be allocated to the transmission function using the Net Plant allocator.

With respect to the items discussed in SWEC 1-14, per an Illinois Commerce Commission order issued in 2014, AIC classified $66,759,247 of accumulated deferred income taxes related to its revenue reconciliation adjustment in the “Other” line item on FERC Form 1, page 276-277 for
account 283 – Accumulated Deferred Income Taxes – Other. The Illinois Commerce Commission concluded in its order that neither the reconciliation balance nor any related ADIT were adjustments to rate base.

Ameren Illinois Company's
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Data Request No.:  SWEC 3-14

Please refer to the response to SWEC 1-17.

(a) Please provide details regarding the $17,257 in Regulatory Costs booked to Acct. 923 that are excluded from Attachment O through the calculations shown in WP 19.

(b) Please provide details regarding the remaining expenses, other than Regulatory Costs excluded from Attachment O through the calculations shown in WP 19 that are booked to Account 923 and recovered under Attachment O.

**RESPONSE**

(a) AIC has chosen to remove these costs and not collect as part of the ATRR, therefore the details related to these costs are irrelevant.

(b) This information has not been made available to the public in the detail requested, and Ameren Illinois could be harmed from a commercial and a security perspective if it were made public. As a result, Ameren Illinois is not posting this information for public review but instead will make it available in a separate attachment upon execution of a Non-Disclosure and Confidentiality Agreement.
Data Request No.:  SWEC 3-15

Please refer to SWEC 1-17 Attachment.  Please explain the nature of the following items:

<table>
<thead>
<tr>
<th>Line No.</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>6</td>
<td>Application Development</td>
</tr>
<tr>
<td>7</td>
<td>Application Enhancements</td>
</tr>
<tr>
<td>8</td>
<td>Application Mtce and Support</td>
</tr>
<tr>
<td>11</td>
<td>Benefits Web Enrollment</td>
</tr>
<tr>
<td>12</td>
<td>Billing Misc</td>
</tr>
<tr>
<td>15</td>
<td>Business and Corporate Risk Mgmt</td>
</tr>
<tr>
<td>16</td>
<td>Business and Corporate Svcs. Planning and Support</td>
</tr>
<tr>
<td>20</td>
<td>Claims Property Litigation</td>
</tr>
<tr>
<td>23</td>
<td>Community Relations</td>
</tr>
<tr>
<td>24</td>
<td>Competitive, Industry Intelligence</td>
</tr>
<tr>
<td>39</td>
<td>Diversity Council</td>
</tr>
<tr>
<td>43</td>
<td>Education Programs</td>
</tr>
<tr>
<td>56</td>
<td>Fuel Accounting</td>
</tr>
<tr>
<td>57</td>
<td>Government Advocacy ES and H</td>
</tr>
<tr>
<td>61</td>
<td>Industrial Relations Counseling</td>
</tr>
<tr>
<td>76</td>
<td>Legal State Regulatory Services</td>
</tr>
<tr>
<td>80</td>
<td>Market Research and Analysis</td>
</tr>
<tr>
<td>85</td>
<td>Od Consulting</td>
</tr>
<tr>
<td>92</td>
<td>Public Relations</td>
</tr>
<tr>
<td>94</td>
<td>Regulatory Policy and Planning</td>
</tr>
<tr>
<td>95</td>
<td>Regulatory Risk Management</td>
</tr>
</tbody>
</table>

**RESPONSE**

See SWEC 3.15 Attach
Data Request No.: SWECC 3-16

Please refer to the response to SWEC 1-19(b). Please provide a copy of the ICC-approved General Service Agreement referenced therein.

**RESPONSE**

See SWEC 3-16 Attach.
Data Request No.: SWEC 3-17

Please refer to SWEC 1-19 Attachment. Please provide a brief description of each of the expenses listed in this Attachment and explain the current identifiers (such as 001A or F_CC).

RESPONSE

The expenses identified in SWEC 1-19 Attachment are described by activity in SWEC 1-21 Attachment

See SWEC 3-17 Attach to explain the identifiers provided in SWEC 1-19 Attachment.
Data Request No.: SWEC 3-18

Please refer to the response to SWEC 1-22. Has Ameren included any Franchise Fee in computing the ATRR? If yes, please provide the amount and the reference to Attachment O related to this inclusion.

RESPONSE

Yes, $12,483,127 of franchise fee(s) are booked to Account 927 and included in computing the ATRR. After the application of the wage and salary, the final amount included in the ATRR is $1,103,867.

In the order in Docket ER-16-1169-000, Paragraph 50 explicitly states that Attachment O-AIC allows for recovery of Account 927, Franchise Requirements, as part of Administrative and General Expenses, and allocates these amounts with the Wages and Salaries allocator. Therefore, the Commission denied this aspect of the formal challenge, as they found that it amounts to a collateral attack on the filed rate.
Data Request No.: SWEC 3-19

Please refer to SWEC 1-21 Attachment.

(a) Please explain the nature of the following items (Page references of SWEC 1-21 Attachment are provided in parenthesis):

- E&G Engineering & Design (P 1)
- EMS Support - EMS/SCADA-SPT (P1)
- System Admin - Office Supplies (P1)
- ARES Billing (P2)
- Community Relations (P2)
- Commodity Settlements (P8)
- Social Media Activities (P9)
- ES&H Monitoring & Spec Studies (P15)
- Legal State Regulatory Services (P16)

(b) Please explain the reasons for not booking public or community relations expenses "below the line."

**RESPONSE**

(a) See SWEC 3-19 Attach.

(b) In the ordinary course of business, just and reasonable public or community relations expenses are incurred to operate the business and are therefore recoverable and not required to be booked “below the line”. For example, Ameren Illinois uses social media for providing safety messages to remind farmers to be aware of overhead power lines as farmers engage in their annual planting and harvesting activities.
Ameren Illinois Company's
Response to SWEC Data Request – Set 3
2015 AIC Attachment O True-up

Data Request No.: SWEC 3-20

Please refer to the response to SWEC 1-25, which states that Ameren did not include any costs related to merger in Attachment O. SWEC 1-5 Attachment 1 shows that two amounts related to merger costs booked to Account 190 (called “597 – Merger Costs – Debt Integration Costs”) are included. Please reconcile both the responses.

RESPONSE

Ameren interpreted the SWEC1-25 to be referencing direct merger costs. Since no such costs were included in the 2015 true up there is no conflict between answers.

In the Order Denying Formal Challenge, Docket No. ER 16-1169-000, Ameren Illinois has agreed to exclude the ADIT for Merger Costs Debt Integration from the calculation of the 2016 True-Up. It will be excluded from the 2015 True-Up as well.
Data Request No.: SWEC 3-21

Please refer to the response to SWEC 1-26(a). Please provide the similar data as of December 31, 2014.

**RESPONSE**

The account balances as of December 31, 2014 for:

i) Electric I&D reserves is $15,219,948 (total AIC is $28,904,018)

ii) Electric Customer Advances is $33,667,485 (total AIC is $46,365,668)

iii) Total Customer Deposit is $40,804,328.
Data Request No.:  SWEC 3-22

Please refer to the response to SWEC 2-1, which relates to the ICC’s disallowance of a debt premium cost and the entries to Balance Sheet Acct. 189.

(a) Has Ameren reflected the debt premium cost disallowance in Attachment O? If yes, please provide the reference to this disallowance in Attachment O. If no, please explain the reasons for not doing so. Also, please provide the impact of reflecting the debt premium in computing the ATRR.

(a) Please explain the reasons for not including Account 189 in Attachment O.

(b) Please provide the impact on the ATRR of including Account 189 amount in Attachment O.

RESPONSE

(a) Yes, as previously discussed in SWEC 2-1.

(a) Account 189 is not included per the Attachment O formula.

(a) To include Account 189 would be an asset and increase in rate base and provide us the opportunity to earn a return on the asset. The asset recovery is allowed by inclusion in Account 428.1 over the original life of the debt as described in SWEC 2-1.
Data Request No.: SWEC 3-23

Please refer to the response to SWEC 2-8. Are there any MGP remediation costs booked to A&G accounts? If yes, please provide these amounts and the reference to Attachment O showing their exclusion.

**RESPONSE**

Please refer to the response to SWEC 2-8. There are no MGP remediation costs booked to A&G accounts.
Data Request No.: SWEC 3-24

Please refer to the response to SWEC 2-9.

(a) Please provide the amount related to asbestos litigation booked to Acct. 925 in 2015.

(b) Please provide other amounts related to asbestos litigation included, if any, in the ATRR.

(c) Please provide the details of the asbestos litigation.

(d) Please provide the location and nature of the facilities to which the asbestos litigation was related.

**RESPONSE**

(a) See response to SWEC 2.9.

(b) There were no other amounts included in the ATRR.

(c) These claims are personal injury or wrongful death claims involving allegations of exposure to asbestos or materials containing asbestos and/or asbestos-related activities in connection with or at facilities owned or once owned by Ameren Illinois or its predecessor(s) in interest.

(d) The facilities in question generally are power plants, although occasionally allegations arise of exposures from working in and around the distribution system.
Ameren Illinois Company's  
Response to SWEC Data Request – Set 3  
2015 AIC Attachment O True-up

Data Request No.: SWEC 3-25

SWEC 3-25 Please refer to the response to SWEC Attachment 1-9(a) of SWEC Data Request AIC 2016 Projection Attachment O (CONFIDENTIAL ATTACHMENT). Please provide the original gross book balances as of December 31, 2014 and December 31, 2015 related to the following General & Intangible Plant:

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

RESPONSE

This information has not been made available to the public in the detail requested, and Ameren Illinois could be harmed from a commercial and a security perspective if it were made public. As a result, Ameren Illinois is not posting this information for public review but instead will make it available in a separate attachment upon execution of a Non-Disclosure and Confidentiality Agreement.