STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

North Shore Gas Company The Peoples Gas Light and Coke Company Proposed Addition of a New Service Called Rider Purchase of Receivables	))))))	Docket No. 16-0033 and Docket No. 16-0034

DIRECT TESTIMONY OF
KEVIN WRIGHT ON BEHALF OF
THE RETAIL ENERGY SUPPLY ASSOCIATION AND
THE ILLINOIS COMPETITIVE ENERGY ASSOCIATION

I. BACKGROUND

Q. Please state your name and business address.

A. My name is Kevin Wright. My business address is 1601 Clearview Drive, Springfield, Illinois 62704.

Q. By whom are you employed and in what capacity?

A. I am President of the Illinois Competitive Energy Association ("ICEA").

Q. How long have you been employed in your current position?

A. I have been employed in my current position with ICEA since January 2009.

Q. Please explain the job responsibilities and duties in your current position.

A. I am responsible for monitoring, advocating, and defending Illinois' competitive energy markets and being a trusted resource on competitive energy-related issues among regulators, legislators, the media, and the public. In addition, I am responsible for the administrative leadership, strategic planning, and overall efficiency of ICEA operations.

Q. Please describe your educational background and relevant work experience prior to joining ICEA.

A. I hold a Masters in Public Administration degree from the John F. Kennedy School of Government at Harvard University and a Bachelor of Arts degree in Political Science from Southern Illinois University at Carbondale. From September 2002 until April 2003, I served as Chairman of the Illinois Commerce Commission ("ICC" or "Commission") and served as an ICC Commissioner until February 2007. While serving on the Commission, I was Chair of the Electric Policy Committee, Co-Chair of the Post 2006 Initiative to competitive electricity markets, President of the Organization of MISO States, a NARUC Electricity Committee member, and Vice Chair of the FERC-State Joint Board for implementing the federal Energy Policy Act of 2005. I have over 25 years of Illinois state government experience and have held numerous senior-level administrative, legislative, and policy positions under two governors and one secretary of state.

Q. Have you ever testified before a regulatory agency?

A. Yes. I have testified before the Commission in ICC Docket No. 10-0138, Commonwealth Edison Company, Proposal to establish Rider PORCB (Purchase of Receivables with Consolidated Billing and to revise other related tariffs) in which I provided Direct and Rebuttal Testimony in the Initial proceeding and Direct and Reply Testimony on Rehearing. I also testified before the Commission in ICC Docket No. 13-0192, Ameren Illinois Company's general gas rate proceeding. I provided Direct and Rebuttal Testimony regarding the creation of a small-volume gas transportation program for Ameren's residential and small commercial customers.

Q. On whose behalf are you testifying today?

A. I am testifying on behalf of the Retail Energy Supply Association ("RESA")[1] and the Illinois Competitive Energy Association. RESA's and ICEA's petitions to intervene in this proceeding have been granted by the Administrative Law Judge.

Q. Please describe briefly the operations of RESA and ICEA.

A. RESA is a non-profit trade association of independent corporations that are involved in the competitive supply of electricity and natural gas. RESA and its members are actively involved in the development of retail and wholesale competition in electricity and natural gas markets throughout the United States. Some of the members of RESA have certificates from the Illinois Commerce Commission (the "Commission") under Section 19-110 of the Public Utilities Act to operate as Alternative Gas Suppliers ("AGS")[2] in the State of Illinois, including the service territories of North Shore Gas Company ("North Shore") and The Peoples Gas Light and Company ("Peoples Gas") (collectively referred to as the "Gas Utilities"), the Respondents in this proceeding. Currently, these AGS provide gas supply service to tens of thousands of customers of the Gas Utilities,

[1] The comments expressed in this filing represent the position of the Retail Energy Supply Association (RESA) as an organization but may not represent the views of any particular member of the Association. Founded in 1990, RESA is a broad and diverse group of more than twenty retail energy suppliers dedicated to promoting efficient, sustainable and customer-oriented competitive retail energy markets. RESA members operate throughout the United States delivering value-added electricity and natural gas service at retail to residential, commercial and industrial energy customers. More information on RESA can be found at www.resausa.org.

[2] The acronym "AGS" will be used herein to designate both Alternative Gas Suppliers and Alternative Gas Supplier.

including participants in their Choices for You Programs, which are small-volume gas transportation, or Choice, programs.

ICEA is a 501(c)(6) business trade association of retail electric suppliers and natural gas suppliers that strives to preserve and enhance customer choice and competition in the electric and natural gas supply industries in Illinois.[3] ICEA's focus and mission is to foster a positive regulatory and legislative climate that promotes competitive retail and wholesale energy markets; educate policymakers, legislators, and the public that electric and natural gas competition provides costs savings and value-added products to customers; and defend against threats that would turn back-the-clock on retail competition and customer choice.

Q. Please summarize your testimony.

A. Peoples Gas and North Shore have put together an effective purchase of receivables ("POR") program which incorporates cost recovery within the program and ensures the ability of the utility to terminate for the full amount of the receivable. In fact, as explained by Ms. Debra E. Egelhoff, in her direct testimony on behalf of the Gas Utilities, their filing in this proceeding resulted from a Settlement Agreement (dated June 22, 2015) between RESA and the Joint Applicants in Ill. C. C. Docket 14-0496 (Wisconsin Energy Corporation, Integrys Energy Group, Inc., Peoples Energy LLC, North Shore and Peoples Gas), in which the Commission approved the reorganization of North Shore and Peoples

[3] The comments expressed in this filing represent the position of the Illinois Competitive Energy Association (ICEA) as an organization but many not represent the views of any particular member of the Association. Founded in October 2008, ICEA represents some of the most active retail energy suppliers operating in the Illinois retail electric and natural gas markets and serving residential, small commercial, commercial and industrial customers. More information on ICEA can be found at www.illinoiscompetitiveenergy.com

Gas. Subsequent to that Settlement Agreement, representatives of the Gas Utilities met with representatives of RESA and discussed their proposal for a POR Program and their proposed tariffs to implement such a program.

In my direct testimony, I explain why a POR program is necessary for the natural gas competitive market in Illinois to thrive and why a POR program offers benefits for AGS and customers, without a detriment to the Gas Utilities.

Q. Are the POR Program tariffs filed by the Gas Utilities consistent with the Settlement Agreement and the discussions between the Gas Utilities and RESA?

A. Yes. Each of the Gas Utilities' proposed Rider Purchase of Receivables is consistent with the Settlement Agreement and the discussions held pursuant to that Settlement Agreement.

Q. Please explain what a POR Program is.

A. A POR Program is designed to have the utility purchase the receivable of a retail supplier. The receivable then becomes a utility owned debt. The supplier is paid its bill amount to the customer less a percentage to recover potential uncollectible risk. This percentage is often referred to as the discount rate.

Q. In general, what are the advantages from a public policy perspective of having a POR program?

A. There are several crucial advantages to having a POR program from a public policy perspective. First, POR allows for a single collection point for a customer who receives a single bill. In addition, as a vehicle through which AGS' receivables can be purchased, POR programs promote retail competition by enabling competitive suppliers to offer service to all residential and small commercial customers, regardless of their income level or the size of their load. This results in a broader segment of consumers enjoying the benefits of retail competition, including lower prices and the ability to select from multiple energy options. Thus, POR programs facilitate market entry by competitive suppliers, which, in turn, creates a greater choice of rate and service options for customers and, in particular, residential customers. I will discuss these benefits in more detail in the remainder of my testimony.

II. <u>IMPORTANCE OF A POR PROGRAM</u>

Q. Why is it important for the Gas Utilities to implement POR programs?

A. AGS use utility consolidated billing to bill their products. This allows for a single bill for all gas charges to be sent to the customer. Because they are the owners of the bill, utilities are better suited for collections and can do so at a lower cost. Under the current system, the Gas Utilities bill AGS' customers and AGS' customers then make payments to the Gas Utilities which they later remit to the AGS. A POR is the next logical step to enable the Gas Utilities to take full control of the billing and collections process.

Absent a POR Program, AGS have to separately collect non-payments from customers who are simultaneously in collection with the Gas Utilities for charges that appeared on a single bill. Each AGS would have to develop its own systems and employ its own labor to engage in these activities which comes at a higher cost because the AGS only knows the amount to be applied to its portion of the bill and must do further research to understand whether or not the non-payment was through utility error or true customer non-payment, prior to beginning the collection process. Once collection is in place, fees for the collection process are placed on the customer. In the case of a non-POR bill, the customer would face collection fees from two entities rather than one. By reducing the collection costs to AGS, AGS can pass that savings on to customers with lower prices.

Finally, a POR program will level the playing field so that AGS can effectively compete against the Gas Utilities to supply gas to customers. As I will further explain, utilities have inherent advantages when it comes to collecting outstanding accounts from customers. Without the advantage of a POR program, it is difficult for AGS to compete with the utility, and, as a result, fewer AGS have entered into the market in Illinois because it is not cost effective to do so.

Q. You mentioned that utilities have an advantage when it comes to customer collections. Can you explain this?

A. Yes, utilities are better suited for collections because they have greater recourse in the event a customer does not pay. The utility can shut off a customer's gas supply for non-payment whereas an AGS cannot shut off delivery of gas to the customer's home. The AGS' only recourse is to stop supplying gas to the customer and turn the account back to the utility. In this scenario, the customer still continues to have gas delivered to his or her home by the utility. This also creates confusion for customers who may end up in collection with their AGS but never have a disruption in service and, because they paid the utility, might assume the AGS was also paid.

Q. Would you please explain why there is confusion for transportation customers in the collection process today?

A. Today, if a Choice customer makes a partial payment, the utility is paid first. So if a customer only pays enough each month to cover his or her utility past due amount, a retail supplier will receive zero money. If a supplier drops the customer, the customer's debt to the supplier will only appear on the utility bill for 45 days from the final due date. After that, if the customer still has not paid the amount, it reverts to the supplier for collection.

It is at that point where customer confusion can occur. The customer will say he or she paid Peoples Gas, for example, and the AGS should collect from it. The AGS' system will show that Peoples didn't send payment. However, the supplier does not receive a copy of the customer's bill, nor does the supplier know the actual amount paid each month. Therefore, it is the customer's responsibility to prove that he or she paid enough to cover the past due amount to Peoples Gas. It is also the customer's responsibility to prove to the supplier that Peoples Gas received the funds. Finally, many customers will not understand the fact that while the supplier's charges have been removed from the Peoples Gas' bill, that does not mean that it is no longer a debt owed to the supplier.

POR resolves all of these issues. It ensures that the entity which has a copy of the bill and knows how payments were applied to the total bill is the single collection entity from start to finish. Also, when the utility purchases the receivables, they are amounts owed to the utility, just the same as the utility's other charges, such as for distribution service.

Q. Why does having limited recourse disadvantage AGS from collecting past due amounts from customers?

A. If a customer knows that there are consequences for not paying a bill, that customer is much more likely to pay the bill. For example, if a customer thinks that non-payment will result in the shut off of natural gas to his or her home, the customer will be more likely to pay the bill. On the other hand, the customer is much less likely to pay his or her bill when a customer knows there are limited consequences for not paying a bill, such as the case with an AGS.

Q. Is the rate of collection increased when the same party that bills customers collects on the outstanding accounts?

A. Yes. Utilities bill AGS' customers, and the AGS' customers pay the utility which later remits the payment to the AGS. However, after a customer account becomes past due, the utility relinquishes all collections responsibility and it becomes the AGS' responsibility to collect on the past due accounts. It is more difficult for AGS to collect on these accounts because the customer is not accustomed to receiving a bill from the AGS. The customer is less likely to view the AGS as having a continuing business relationship and therefore the customer is less likely to pay. Moreover, the customer may be confused as to why he or she is receiving a bill from the AGS when the bill had previously come from the utility.

Q. Ultimately, what is the effect of the utility's inherent advantage associated with collections?

A. The effect is that a utility has much more success at collecting from customers and thus utilities receive a greater percentage of the accounts billed. This is so even though a utility's cost of collection is typically less. Ultimately this means an AGS' bad debt expense (amount on unpaid accounts plus cost of collections) is much greater than a utility's bad debt expense.

Q. How does a high bad debt expense harm AGS?

A. This is harmful for AGS because a high bad debt expense increases the cost an AGS incurs in serving customers. The negative effect of this additional cost is compounded by the fact that a high bad debt expense compared to that of a utility makes it more difficult for an AGS to compete. An AGS factors its overall costs into the pricing it offers customers. Therefore, if an AGS' overall costs are increased, the AGS must increase prices in order to make it profitable to offer service to customers. In addition, a utility's price is based on its cost to serve customers. If a utility has a significantly lower cost (because of a lower bad debt expense) than an AGS' cost, then a utility will have a lower price to customers. Obviously, if a utility's price is lower than the AGS, more customers will stay with the utility, and the AGS will find it very hard to be competitive.

Q. How does a POR program help AGS?

A. Because the utility purchases these receivables without recourse, the AGS will receive payment for the customer's account regardless of whether a customer pays. This means that an AGS no longer has to assume the risk of a customer not paying or expend resources on collecting past due accounts. While the AGS may receive less than the total amount due on the accounts, this reduced revenue is more than made up for by the AGS' elimination of bad debt expense and collection costs. As I explained previously, because of an AGS' inherent limitations when it comes to collections, an AGS' bad debt expense can be quite high.

Q. Do the Gas Utilities' POR Programs allow suppliers to avoid collection risks?

A. No. Initially, Suppliers will pay for the amount of uncollectible risk of Peoples Gas and North Shore as determined by their Rider UEA filing. After an initial term, suppliers will pay the uncollectible risk associated with the accounts they serve.

The result of this well designed program is that suppliers bear the risk of customer non-payment, while providing customers a single point of contact for collection.

Q. Do the Gas Utilities' POR Programs allow suppliers to include non-commodity items on the bill?

A. No. The only charges eligible for recovery under the POR Program are those associated with providing the commodity service.

Q. Does the POR Program allow suppliers to get paid disputed amounts?

A. No, the contract between the supplier and the Gas Utilities has two requirements on this point. First, if the customer has a dispute the supplier must notify Peoples Gas or North Shore. Second, if the dispute is not resolved after the supplier was paid, then the supplier must remit the funds back to Peoples Gas or North Shore. This is in addition to the current practice of removing disputed charges from a bill.

III. <u>POR PROGRAM'S EFFECT ON RATE PAYERS</u>

Q. Will the POR program benefit customers?

A. Yes, the POR program will benefit customers. Beyond reducing a customer's confusion and negative experience from dealing with two separate collection entities over a single bill, a POR program leverages the utility's inherent advantage in collections to reduce the net bad debt expense for all customers. Rather than every supplier expending resources to collect on accounts with limited success, a POR program reduces the redundancy of collections expenditures and enhances the success of collecting on unpaid accounts. This net cost reduction will be passed on to customers through lower prices and more diverse products offered by AGS.

Q. You say that AGS will pass on their cost reduction by lowering customer prices. How can you be sure of this?

A. In a competitive natural gas market AGS will have to reduce prices if they wish to remain competitive with other suppliers, as well as the utilities. Currently in the Gas Utilities' service territories, many AGS are not offering products because their costs are too high to be profitable. However, if the costs to AGS are reduced substantially by the implementation of a POR, AGS will be able to enter the market with the ability to offer a lower price to customers. As more AGS enter the market, the existing AGS will have to lower their prices if they wish to be competitive.

Q. In sum, are you saying that a POR program will ultimately result in lower prices and a wider array of competitive products customers?

A. Yes. A POR program will enable AGS to offer customers lower prices, and ultimately make the natural gas market in the Gas Utilities' service territories more competitive.

IV. BENEFITS OF A POR PROGRAM

Q. So far you have described a POR program and its effect on parties. Can you go into more detail about the specific benefits of a POR program?

A. Yes the specific benefits to POR are many, as I detail below:

- *Reduced customer confusion regarding collections.* POR allows one party (the utility) to provide a consolidated bill for supply and delivery charges, and follow through with the customer on all collection issues associated with the bill, thus reducing customer confusion. Further, POR avoids the potential complications of proration where misapplications of payments occur, problematic synchronization of receivable balances between the utility and supplier, and the potential of inconsistent information being provided to consumers.
- *Leverage existing systems, reducing overall costs.* With POR, the utility leverages already-existing infrastructure to manage receivables, including: IT, Accounting, Call Center and telephone systems, Collections, and Field Systems to handle the receivable throughout the lifecycle. For a customer who is delinquent on the distribution charge, he or she is also delinquent on the commodity charge (given the priority of payment utilized by Peoples Gas and North Shore) which means the utility would already be contacting the customer regarding the non-payment, so simply including the entire bill that is delinquent in the recovery

mechanisms adds little additional effort to the collections call. Without POR, AGSs must duplicate these systems, increasing overall costs.

- *Continuity of message and consistency in treatment of receivables.* When the utility owns the receivable, each customer is subject to the same rules, efforts and processes. This allows for the same protections for all customers, and a continuity of efforts without duplicating efforts or presenting conflicting messages.
- *Expanded access to the competitive market for higher risk customers.* Without a POR, AGS have to focus on enrolling only the most credit-worthy individuals, which concentrates the best paying customers with AGS, leaving the more credit-challenged customers with the utility. This disadvantages the credit-challenged customers by eliminating or greatly reducing their access to the competitive market and the products only offered on the competitive market (such as fixed bill or guaranteed savings products). With POR, these concerns are greatly mitigated and credit-challenged customers gain much greater access to the competitive market. Further, without POR, suppliers are less likely or even able to offer guaranteed discounts off of the utility's default rate, since the risk or unknown regarding the ability to recover the charges without POR is too significant to allow for the guaranteed discounted rates on any consistent basis.
- *Efficient utilization of effective recovery tools.* Utilities possess tools to ensure most consumers who can pay for their natural gas do pay for their natural gas; the most effective of which is the ability to threaten to disconnect service for non-payment and require payment of past due amounts and/or security deposits to

allow reconnection to occur. AGS do not have this tool available to them. Because the Gas Utilities will purchase the receivables from participating AGS on a non-recourse basis, the Gas Utilities will have the same recovery tools for the purchased receivables that they would have had they sold the supply to customers.

- *Diminished counterparty risk.* One of the risks that AGS currently must factor into their pricing is the risk that their counterparties will not be in a position to pay their bills. Counterparty risk is greatly diminished through a POR program. The regulated nature of a utility generally ensures that it will recover its costs of doing business, and will also experience a relatively consistent rate of return through economic cycles of growth and contraction. With POR, where the counterparty is a regulated utility, with an approved rate of return, an AGS' counterparty risk is virtually zero. Again, this is not just a benefit to AGS—it creates the conditions for a more vibrant competitive market that will provide benefits to customers.

POR IN OTHER STATES

Q. Are there any natural gas utilities in other states that have POR programs?

A. Yes. Many natural gas utilities throughout the country have successfully implemented POR programs as part of their customer Choice programs.

Q. Do electric utilities offer POR programs as well?

A. Yes. In Illinois, both ComEd and Ameren have POR programs. Electric utilities in New York, New Jersey, Pennsylvania, Ohio and Maryland offer POR programs as well.

Q. What has the experience been with POR in Illinois?

A. It is well known that the Illinois residential competitive market has expanded greatly since the implementation of POR. POR is not the only factor that has contributed to the success of the competitive electric market. To be sure, the relatively high utility price-to-compare resulted in high levels of customer switching in 2011 and 2012. Governmental aggregation has also been a major factor. However, without POR, several suppliers offering products likely would not be in the market and governmental aggregation would likely not have been as effective or vibrant as it has been. POR is part of the fundamental foundation for competition, without which large-scale residential customer switching simply would not have occurred. The availability of POR for electric customers and the lack of POR for gas customers have resulted in very different rates of participation in the Choice Programs of electric and gas utilities. For electric utilities, the following are the percentages of residential customers participating in their choice programs as of May 2015[4]:

ComEd—61.5%

Ameren (Zone 1)—53.0%

Ameren (Zone 2)—68.5%

Ameren (Zone 3)—56.9%

[4] Illinois Commerce Commission's Office of Retail Market Development 2015 Annual Report, submitted pursuant to Section 20-110 of the Public Utilities Act (June 2015) (ORMD Electric Report), page 22.

In contrast, the following are the percentages, as of December 2014, of residential customers participating in the choice programs of Illinois gas utilities having choice programs[5]:

Peoples Gas—13.2%

North Shore—10.6%

Nicor Gas—11.7%

Q. Why hasn't Illinois seen higher levels of participation in natural gas customer Choice programs?

A. Where POR does not exist, fewer suppliers engage in the market and the products offered are less dynamic and less likely to guarantee a discount. For example, the Commission's Office of Retail Market Development's ("ORMD") latest annual report on retail electric markets in Illinois indicated that, as of April 2015, 10 ARES in Ameren's service territory posted 24 residential offers on the Commission's pluginillinois website and 30 ARES in ComEd's service territory posted 75 residential offers on that site. (ORMD Electric Report, p. 33) In contrast, ORMD's latest annual report on retail gas markets in Illinois indicated that, as of August 2015, 7 AGS in Peoples Gas' service territory posted 24 residential offers on the Commission's website, 6 AGS in North Shore's service territory posted 21 residential offers on the site, and 8 AGS in Nicor Gas' service territory posted 29 residential offers on the site. (ORMD Gas Report, p. 12)

States without POR programs, where supplier consolidated bill options with disconnect are not available, have not seen significant migrations because AGS'

[5] Illinois Commerce Commission's Office of Retail Market Development Annual Report on the Development of Natural Gas Markets in Illinois, submitted pursuant to Section 19-130 of the Public Utilities Act (October 2015) ("ORMD Gas Report"), page 10

collection and bad debt expenses in those states greatly increase the cost for AGS to serve customers. Because it costs more to serve customers, it is more difficult for AGS to offer dynamic pricing to all customers, and without offers being more widely available, customers do not switch to AGS. Without a POR program, AGS must limit their customer offers to only the most credit-worthy customers, further limiting the customer pool to which AGS market to high-credit-worthy customers and increasing the costs because those customers are not identifiable without credit reviews. This issue is acknowledged in the ORMD Gas Report which states, "the lack of an option to sell receivables to the gas utility for an AGS' residential and small commercial customers could be a reason why the number of suppliers in this market is substantially smaller than the number of suppliers in the residential and small commercial retail electric market".[6]

Q. Can you expand on your discussion of natural gas POR programs in other states?

A. Yes. Many gas utilities in many states have successfully implemented POR programs. POR is part of Choice programs in at least 9 other states, including Indiana (Northern Indiana Public Service Company), Ohio (Dominion East Ohio, Columbia Gas, Vectren, Duke), Michigan (Consumers Energy, Michigan Consolidated (MichCon) a version of POR), Pennsylvania (Columbia Gas of Pennsylvania, PECO, NFG), Kentucky (Columbia Gas of Kentucky), New York (Orange and Rockland, Central Hudson, National Grid, National Fuel, ConEd, Keyspan, Rochester Gas and Electric), Maryland (Baltimore Gas & Electric, Washington Gas & Light), Wyoming (Source Gas) and Nebraska (Source Gas).

[6] *Id*., p. 18.

Q. What has been the effect of POR programs on competitive markets in other states?

A. Utility POR programs have increased competition in a number of states. States without POR programs have not seen significant migrations because AGS' bad debt expenses in those states greatly increases the cost for AGS to serve customers. Because it costs more to serve customers, it is more difficult for AGS to offer competitive pricing, and without competitive prices, customers do not switch to AGS. Further, without a POR program AGS must limit their customer offers only to the most credit-worthy customers, further limiting the customer pool to which AGS market.

Q. Can you explain in more detail the success of POR programs in other states?

A. Yes, in most states with POR programs there are many suppliers actively offering a multitude of products to residential natural gas consumers. A good example is Ohio where there is an over 50% migration rate and 72 suppliers are marketing to residential customers[7].

Q. Do you think the implementation of a POR program in the Gas Utilities' service territories will have the same effect it has had in other states?

A. Yes, the evidence is overwhelming that POR contributes to increased customer access to the benefits of participation in the competitive market and, therefore, increased customer migration. The implementation of POR would be a significant step towards achieving a competitive and robust natural gas market in the Gas Utilities' service territories.

[7] Natural Gas Customer Choice Programs in Ohio, Customer Enrollment Levels As of December 2015, Ohio Public Service Commission.

V. CONCLUSION

Q. Does this conclude your direct testimony?

A. Yes, it does.

NOTICE OF FILING

Please take note that on May 25, 2016, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Direct Testimony of Kevin Wright on behalf of the Illinois Competitive Energy Association and the Retail Energy Supply Association in this proceeding.

/s/GERARD T. FOX
Gerard T. Fox

CERTIFICATE OF SERVICE

I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Direct Testimony of Kevin Wright on behalf of the Illinois Competitive Energy Association and the Retail Energy Supply Association upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for Ill. C. C. Dockets 16-0033/16-0034 (consolidated) via electronic delivery on May 25, 2016.

/s/ GERARD T. FOX
Gerard T. Fox