

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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

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

1 **I. BACKGROUND**

2 **Q. Please state your name and business address.**

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

5 **Q. Are you the same Kevin Wright who submitted Direct Testimony on behalf**
6 **of the Illinois Competitive Energy Association¹ and the Retail Energy Supply**
7 **Association² in this proceeding?**

¹ The comments expressed in this filing represent the position of the Illinois Competitive Energy Association (ICEA) as an organization but may 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

² 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

8 A. Yes.

9 **Q. What is the purpose of your Rebuttal Testimony in this proceeding?**

10 A. In my Rebuttal Testimony, I respond to the Direct Testimony of the Staff of the
11 Illinois Commerce Commission (“Commission”) and the Direct Testimony of Mr.
12 Bryan McDaniel on behalf of the Citizens Utility Board.

13 **Q. Please summarize your testimony.**

14 A. As I demonstrated in my Direct Testimony, The Peoples Gas Light and Coke
15 Company (“Peoples”) and North Shore Gas Company (“North Shore”)
16 (collectively referred to as the “Gas Utilities”) have put together an effective
17 purchase of receivables (“POR”) program that incorporates cost recovery within
18 the program, which, as acknowledged by Staff witnesses, does not impose costs
19 on Peoples’ and North Shore’s sales customers. In my direct testimony, I also
20 demonstrated that a POR program is necessary for the natural gas competitive
21 market in Illinois to thrive and that a POR program offers benefits for Alternative
22 Gas Suppliers (“AGS”) and customers, without a detriment to the Gas Utilities.
23 Staff’s Direct Testimony does not oppose the implementation on the Gas Utilities’
24 POR Programs. Ms. Burma Jones recommends two revisions to the tariff
25 language proposed by the Gas Utilities in this proceeding, revisions which the
26 Gas Utilities have accepted, and to which ICEA and RESA have no objection.
27 On the other hand, Mr. McDaniel, on behalf of CUB, recommends that the
28 Commission reject the POR Programs or, in the alternative, approve them with a

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.

29 condition that makes the Programs unworkable and effectively kills them. Mr.
30 McDaniel's recommendations have no empirical support and are absolutely
31 without merit, as I will demonstrate in my Rebuttal Testimony.

32 **Q. Could you please summarize the benefits of the proposed Purchase of**
33 **Receivables programs in these dockets?**

34 A. Yes. As I stated in my Direct Testimony, the first benefit is that POR allows for a
35 single collection point for a customer who receives a single bill. A customer
36 taking supply from an AGS needs to deal with only one bill and one collection
37 entity from start to finish for that bill: the utility. This lowers the chance that a
38 customer will pay their utility bill to maintain service but still end up in
39 collections with an AGS.

40 Second, POR programs promote retail competition by enabling competitive
41 suppliers to offer service to all residential and small commercial customers,
42 regardless of their income level or the size of their load. Thus, a broader
43 segment of customers will be able to enjoy the benefits of retail competition,
44 which I explained in detail in my Direct Testimony.

45 Third, POR programs facilitate market entry by competitive suppliers. This will,
46 for the reasons explained in my Direct Testimony, result in a greater choice of
47 rates and service options for participating customers.

48 Mr. McDaniel fails to see the benefits of POR programs because, without
49 empirical support or any real evidence, he assumes that AGS' prices will always
50 be higher than the Gas Utilities' PGAs and that AGS' business model is to
51 mislead customers.

52 **Q. How could the system as it exists today (without POR) cause customer**
53 **confusion?**

54 A. As I understand Peoples and North Shore's billing systems and practices, both use
55 utility consolidated billing ("UCB") without POR. In other words, the customer
56 gets one bill from the utility for both AGS and utility service, but the AGS
57 receivables are not purchased by the utility. Under the current system and
58 practices, if a customer makes a partial payment, the payment is first applied to
59 utility arrears before application to an AGS' arrears of the same vintage.
60 Furthermore, my understanding is that 45 days after an AGS's final bill to a
61 customer with arrears, the arrears drop off the UCB bill. In that event, the
62 collection obligation reverts to the AGS.

63 In this situation, a customer will see their single bill and it will appear that they
64 are current on payments. However, that customer may have an outstanding
65 balance with the AGS, which is no longer serving that customer subsequent to the
66 final bill. Because of the confusing mixed signal (outstanding balance to the AGS
67 that no longer appears on the utility bill), some customers may refuse to pay the
68 outstanding AGS bill based on an incorrect belief that they do not owe anything to
69 the AGS. Alternatively, the customer could mistakenly believe that the AGS is
70 attempting to double-collect arrears when that is not the case.

71 The POR tariff proposed in this docket would eliminate that confusion.

72 **Q. At lines 80-88 of his Direct Testimony, Mr. McDaniel claims that the absence**
73 **of a POR tariff has not proven to be a significant impediment to competition.**
74 **Do you agree?**

75 A. No. Ironically, Mr. McDaniel relies on one of the sources of information I used in
76 my Direct Testimony to make the opposite point—that the absence of a POR
77 tariff has proven to be a significant impediment to competition—the
78 Commission’s Office of Retail Market Development’s (“ORMD”) Annual Report
79 on the Development of Natural Gas Markets in Illinois (October 2015) (“ORMD
80 Gas Report”).

81 On pages 16-18 of my Direct Testimony, I cite the ORMD Gas Report and the
82 ORMD’s 2015 Electric Report³ to demonstrate that the percentages of residential
83 customers participating in gas choice programs (13.2% for Peoples, 10.6% for
84 North Shore, and 11.7% for Nicor Gas Company) lagged far behind the
85 percentages of residential customers participating in electric choice programs
86 (61.5% for ComEd, 53.0% for Ameren Zone 1, 68.5% for Ameren Zone 2, and
87 56.9% for Ameren Zone 3).

88 The same ORMD reports also demonstrate that the number of Alternative Retail
89 Suppliers (“ARES”) making offers to residential customers, especially in
90 ComEd’s service territory (which overlaps the services territories of Peoples and
91 North Shore), far exceeds the number of AGS making offers to residential
92 customers. Moreover, the number of offers posted on the Commission’s website
93 by ARES far exceeds the number of offers posted on the Commission’s website
94 by AGS.

95 In my opinion, the lack of POR programs offered by gas companies is the major
96 reason why there are not more AGS in Illinois and there are not more residential

³ ORMD’s 2015 Annual Report, submitted pursuant to Section 20-110 of the Public Utilities Act (June 2015) (“ORMD Electric Report”)

97 customers participating in gas choice programs. In fact, the ORMD Gas Report,
98 cited by Mr. McDaniel, suggests the same conclusion: “the lack of an option to
99 sell receivables to the gas utility for an AGS’ residential and small commercial
100 customers could be a reason why the number of suppliers is substantially smaller
101 than the number of suppliers in the residential and small commercial retail electric
102 market”. (ORMD Gas Report, p. 18)

103 In my Direct Testimony, I further demonstrated that states that have POR
104 programs for gas utilities have more participating gas suppliers, more
105 participating customers, and more products. As an example, I pointed out that in
106 Ohio, over 50% of gas residential customers participate in choice programs and
107 there are 72 gas suppliers marketing to residential customers.

108 **Q. Are there any other differences between electric and gas retail markets in**
109 **Illinois that would account for the difference in customer switching?**

110 A. Yes. On the electric side, there is a statutory process for opt-out municipal
111 aggregation, which has been very successful in delivering customers value.
112 However, it is highly unlikely that opt-out municipal aggregation would have
113 worked at any appreciable scale without POR. POR allowed ARES to make
114 standard offers to all customers, regardless of credit score, knowing that the
115 ARES would not be responsible for evaluating each community member’s credit
116 on the front end.

117 **Q. At lines 95-107 of his Direct Testimony, Mr. McDaniel discusses marketing**
118 **activities that POR Suppliers could undertake that would have the effect of**
119 **increasing uncollectibles. Please comment.**

120 A. I find Mr. McDaniel's testimony to be completely speculative, not even rising to
121 the level of anecdotal. He admits as much in response to certain data requests,
122 which are attached as ICEA/RESA Exhibits 2.1 and 2.2 to this testimony. For
123 example, instead of providing support for certain statements made by Mr.
124 McDaniel in his direct testimony, CUB admits that those statements suggest what
125 suppliers could do and are not based on documented instances of the activity
126 referenced by Mr. McDaniel (see, for example, CUB's responses to ICEA-RESA
127 DRS 2.02 through 2.06 in ICEA-RESA Ex. 2.2).

128 Mr. McDaniel attempts to paint a scary picture of suppliers targeting poor
129 customers and customers who don't speak English, sales people who are given
130 incentives to sign up customers to lengthy contracts at high rates, and
131 misrepresenting the benefits of suppliers' products. I am not a lawyer, but my
132 understanding is that some of the behaviors that Mr. McDaniel alleges could
133 happen would be violations of the Public Utilities Act, the Consumer Fraud Act,
134 or the Commission's Rules. For example, I am advised by counsel that, Section
135 19-115 of the Public Utilities Act contains requirements regarding marketing to
136 customers who do not understand English. Failure to meet those requirements
137 would result in the customer being able to terminate the account and expose the
138 supplier to penalties. This would be the case whether or not the Commission
139 approves a POR tariff in this docket, and would put supplier receivables at great
140 risk.

141 As an aside, the Commission tracks AGS that have been found to have violated
142 the Public Utilities Act in the last three years. Currently, the Commission

143 identifies no such suppliers on its website. A copy of the Commission's webpage
144 containing this information as of July 11, 2016 is set forth in ICEA/RESA Exhibit
145 2.3.

146 Setting the legality of these speculated actions aside, Mr. McDaniel offers no
147 evidence that these are real problems or the extent to which they occur or would
148 increasingly occur if the POR tariff is approved.

149 Even if Mr. McDaniel subsequently attempts to quantify the effect of POR on
150 (potentially illegal) acts, Mr. McDaniel's analysis does not address critical
151 variables. For example, Mr. McDaniel fails to recognize that there are high
152 acquisition costs associated with obtaining customers. There is no incentive to
153 acquire customers that cannot afford their sales contracts. If a customer defaults
154 early, utility payments to the AGS would cease and the AGS would have no
155 guaranteed buyer for supply (or hedges) secured in advance to lock in a contract
156 price.

157 **Q. Between lines 114 and 115 of his Direct Testimony, Mr. McDaniel displays**
158 **charts showing Historical Gas Charge rates for North Shore and Peoples.**
159 **Please comment.**

160 A. I think Mr. McDaniel misses the point of his own charts. In my opinion, the most
161 important matter that the charts illustrate is the volatility of gas charges. For
162 North Shore, gas charges for a period of 29 months ranged from a low of 32 cents
163 per therm to a high of \$1.22 per therm, almost four times higher. For Peoples, gas
164 charges for the same period ranged from a low of 24 cents per therm to \$1.19 per
165 therm, almost five times higher. It is due to this extreme volatility that fixed rate

166 products which can be offered by AGS, but not by gas utilities, can be
167 advantageous to customers.

168 A second important point of Mr. McDaniel’s charts is what they don’t
169 demonstrate. For obvious reasons, they don’t show what Peoples’ and North
170 Shore’s gas charges will be for the future. This is why Mr. McDaniel’s
171 observations about the product offered by Santanna Energy Services are short-
172 sighted. Santanna Energy Services’ product, referenced by Mr. McDaniel, is a
173 fixed rate product with a 12-month term. Mr. McDaniel’s “analysis” of a single
174 month is without merit. Moreover, his analysis is not even useful for one month.
175 While Santanna Energy Services’ product does have a monthly administrative fee
176 of \$7.99, the effect of that fee on price comparisons is much greater in months of
177 limited usage (like May the month chosen by Mr. McDaniel) than in months of
178 greater usage.

179 **Q. Could you please provide an example of the flaw in Mr. McDaniel’s analysis?**

180 A. Yes. Consider the chart below which assumes average usage for Illinois
181 residential consumers⁴, with hypothetical PGA and AGS prices:

Month	Projected Usage	Fixed Rate AGS	PGA
July	24	\$0.32	\$0.25
August	23	\$0.32	\$0.27
September	26	\$0.32	\$0.27
October	58	\$0.32	\$0.30
November	108	\$0.32	\$0.30
December	193	\$0.32	\$0.32
January	215	\$0.32	\$0.35
February	171	\$0.32	\$0.43

⁴ Source: Illinois Commerce Commission Website: Natural Gas Choice—Important Information to Consider when Shopping.

March	130	\$0.32	\$0.40
April	73	\$0.32	\$0.31
May	36	\$0.32	\$0.27
June	26	\$0.32	\$0.26

182

183 In the example above, the eventual PGA (which is unknown at the time of the
184 contract except for July) is lower than or equal to the AGS price in nine of twelve
185 months. However, when applied to the actual usage, the AGS pricing saves the
186 customer almost \$25 on supply. That is before, of course, any other value that the
187 customer received from the AGS, including the value of price certainty, rewards
188 programs, environmentally friendly add-ons, or any other value the AGS may
189 add. Note that, like Mr. McDaniel, I have no knowledge as to what the PGA will
190 be in future months.

191 **Q. At lines 121-123 of his Direct Testimony, Mr. McDaniel references an Ambit**
192 **Illinois' product as having the highest rate for May on the Commission's**
193 **website. Please comment.**

194 A. First, I would like to point out that Ambit Illinois is not a member of either ICEA
195 or RESA. Second, Mr. McDaniel fails to point out that Ambit Illinois' product is
196 far in excess of any other offer posted on the Commission's website by AGS, and
197 thus is not typical.

198 Third, and perhaps most important, Mr. McDaniel appears to miss the point of a
199 competitive retail market. The purpose is to allow a customer options, which a
200 customer will select based on objective and subjective measures of value. There
201 will always be a highest and lowest price of available offers, and each one will
202 likely contain some difference in terms and conditions or additional value.

203 Customers are given the freedom to decide which offer delivers them the best
204 value, which could be a product offered by an AGS or the utility's PGA. A
205 significant purpose of the POR is to allow customers who end up in a collection
206 scenario to have an easy process for resolution with a single party. It is not to
207 regulate pricing and this POR construct ensures the actual bad debt experience
208 will be paid for by AGS.

209 **Q. Do you have any other observations about Mr. McDaniel's analysis of the**
210 **AGS' products posted on the Commission's website for May 2016?**

211 A. Yes, I don't agree that the lowest price per therm is that of Santanna Energy
212 Services. Referring to the last posting on page 5 of CUB Ex. 1.1, Nicor
213 Advanced Energy, LLC has a plan called "Flex with Guaranteed Savings". While
214 the variable price listed is 37.4 cent per therm, the offer is described as a "month
215 to month variable rate billing plan, with a guarantee to save at least 5 cents per
216 therm from the utility's daily per-therm price, from time of activation through
217 October 2016". There are no additional fees listed for the product. Moreover,
218 this offer is the kind of offer that I referred to in my Direct Testimony as
219 innovative offers that AGS can bring to the retail gas marketplace.

220 **Q. On lines 126-133 of his Direct Testimony, Mr. McDaniel refers to CUB**
221 **Exhibits 1.1 and 1.2 as demonstrating that AGS' prices, as posted on the**
222 **Commission's website, are consistently higher than Peoples' and North**
223 **Shore' gas charges. Please comment.**

224 A. First, Mr. McDaniel is offering an apples-to-oranges comparison. A large number
225 of AGS' offers are for fixed rate products. It is not appropriate to compare the

226 Gas Utilities' gas charges, which are variable in nature, to fixed rate products.
227 This is especially true in a summer month, where the PGA is typically much
228 lower (as the charts Mr. McDaniel placed in his Direct Testimony demonstrate).
229 Also, a number of AGS' offers are for green energy, a product which is not
230 offered by the Gas Utilities, and which does require a premium. In addition, a
231 number of AGS' offers contain other features which provide benefits to customers
232 that the Gas Utilities do not provide. For example, the first product listed on CUB
233 Exhibit 1.1 is a guaranteed bill offered by Nicor Advanced Energy, LLC which
234 provides the customer with the same bill each month, regardless of changes in the
235 gas market and regardless of usage. This is a product not offered by the Gas
236 Utilities. As another example, the product called "Comfort & Control 24" shown
237 on pages 3-4 of CUB Ex. 1.1 includes a Nest Learning Thermostat which has a
238 retail value of approximately \$250.

239 Second, Mr. McDaniel does not account for a major point that I made in my
240 Direct Testimony. If the Commission approves POR programs for Peoples and
241 North Shore, both the number of AGS in their service territories will increase, as
242 will the number and types of offers. To stay in business, AGS will have to make
243 attractive offers to current and prospective customers.

244 **Q. On lines 136-149 of his Direct Testimony, Mr. McDaniel expresses concern**
245 **about the impact of Rider POR on low-income customers. Please comment.**

246 A. First, Mr. McDaniel's concerns are based on his belief that POR programs result
247 in higher charges for customers. I do not agree with this belief. As I stated in my
248 Direct Testimony, I believe that the Commission's adoption of POR programs for

249 Peoples and North Shore will result in more suppliers and more competitive offers
250 for their residential customers, including low-income customers.

251 Second, I agree that there is typically a premium for fixed priced products and
252 there should be. There are risks and costs incurred by AGS related to such
253 products. Nevertheless, Mr. McDaniel's concerns are misplaced. Low-income
254 customers are particularly in need of fixed priced options because they have the
255 least ability to handle swings in PGA rates. The Gas Utilities do not offer fixed
256 price products. While they do offer Budget Payment Plans, those plans do not
257 afford the level of price certainty offered by fixed price products; they simply
258 equalize payments subject to future adjustment based on changes in gas prices and
259 usage.

260 Finally, POR offers the greatest benefit to those customers who need help paying
261 their bills. This helps in two ways. First, like on the electric side, it simplifies
262 application of low income assistance for all charges to flow through the utility
263 (alleviating any customer concern that their AGS has challenges with low income
264 assistance program). Second, customers today who finds themselves in collection
265 could pay the utility to remain in service. However, despite avoiding shutoff the
266 customers would still remain in collection with their AGS. As I described earlier,
267 this confusing situation is made worse when the customer points to a current
268 utility bill with no supplier arrearage showing. This creates a frustrating situation
269 for customers who paid their utility bill to catch up and are now in collection for
270 something (AGS charges) they no longer see on their utility-issued bill. POR

271 ensures that when customers catch up with the utility they are also caught up with
272 their supplier.

273 **Q. At lines 152-160 of his Direct Testimony, Mr. McDaniel expresses his**
274 **concerns regarding the impact of potential increases in Peoples' distribution**
275 **rates on affordability of gas service. Please comment.**

276 A. Again, his concern is based on his unsupported belief that the Commission's
277 acceptance of POR programs will increase gas supply prices paid by customers,
278 which would be exacerbated by expected increases in Peoples' distribution rates.
279 As I stated previously, I do not agree with Mr. McDaniel that the adoption of
280 POR programs will increase the prices paid by customers participating in such
281 programs.

282 **Q. At lines 162-167 of his Direct Testimony, Mr. McDaniel states: "To the**
283 **extent Rider POR leads to more customers subscribing to higher Supplier**
284 **rates by virtue of aggressive marketing tactics, total program benefits will be**
285 **used up more quickly with fewer people being able to access LIHEAP**
286 **funds". Please comment.**

287 A. Once again, I disagree with Mr. McDaniel that adoption of Rider POR would lead
288 to more customers paying higher supplier rates. In addition, I fail to understand
289 that, even if this were the case, it would result in fewer people being able to
290 access LIHEAP funds. I believe that other factors—from unexpected increases in
291 the PGA (like in the winter of 2014) to the state budget crisis—pose far greater
292 risks to the availability of LIHEAP than the existence of POR. In addition, as
293 noted above, currently a customer may not be able to access LIHEAP type

294 programs for an arrearage that is not owned by the utility. So for certain
295 customers who may need that assist for supplier collections they would be
296 ineligible to use the money because it is not a utility arrearage. POR resolves this
297 issue by allowing customers who find themselves in need to access help for their
298 total natural gas arrearage not just the amount owed to the utility.

299 Mr. McDaniel's hypothetical concerns are ignoring the real world benefits of
300 POR. A customer could have a low AGS price and still find themselves in a
301 situation where they need help but cannot receive it because the debt doesn't
302 belong to the utility.

303 **Q. At lines 171-173 of his Direct Testimony, Mr. McDaniel refers to the discount**
304 **rate as "arbitrary". Do you agree?**

305 A. No. Because there is currently no experience regarding the uncollectibles that
306 would result from a POR program, Peoples and North Shore made an appropriate
307 choice to use, initially, the uncollectible factors set forth in each Company's Rider
308 UEA-GC. Once again, Mr. McDaniel, without any empirical evidence, assumes
309 that uncollectibles rates for sales customers will be lower than uncollectibles rates
310 for transportation customers in the POR Programs.

311 Moreover, even if Mr. McDaniel's concern were valid, it would be temporary.
312 On the first May 1 that occurs 36 months after the riders begin, the POR discount
313 rates will be based on the Gas Utilities' experience with POR customers'
314 uncollectibles. Thus, delivery customers would not bear any additional costs,
315 assuming that uncollectible rates were higher for transportation customers

316 participating in the POR Programs. This is an appropriate method of determining
317 the discount rate.

318 **Q. At lines 179-195 of his Direct Testimony, Mr. McDaniel offers an alternative**
319 **proposal if the Commission rejects his proposal to not accept the Gas**
320 **Utilities' POR Programs. Do you agree with his alternative proposal?**

321 A. No. Mr. McDaniel proposes to limit the price per therm that AGS can pass
322 through Rider POR for each customer to Gas Utilities' PGA prices. To the extent
323 that a Supplier's price exceeded the PGA for a month in question, the amount
324 would be a separate item on the bill. Moreover, if the customer fails to pay the
325 amount of the Supplier's gas supply charges on the Gas Utilities' consolidated
326 bill, the Gas Utilities could not disconnect that customer for non-payment.

327 Mr. McDaniel's alternative proposal basically eliminates all of the benefits of
328 having POR programs, benefits which I addressed in detail in my Direct
329 Testimony, and would effectively kill such programs.

330 First, the customer is now potentially faced with receiving two bills in the event
331 that the customer is unable to pay the full amount of both the utility and AGS
332 charges. With POR, the utility leverages already-existing infrastructure to manage
333 receivables, including: IT, Accounting, Call Center and telephone systems,
334 Collections, and Field Systems to handle the receivable throughout the lifecycle.

335 Second, requiring separate bills for collection further exacerbates the confusion
336 for customers I describe above because now the amount collected by the AGS is
337 potentially split between the utility and the AGS bills. POR allows one party (the
338 utility) to provide a consolidated bill for supply and delivery charges, and follow

339 through with the customer on all collection issues associated with the bill, thus
340 reducing customer confusion. Further, POR avoids the potential complications of
341 proration where misapplications of payments occur, problematic synchronization
342 of receivable balances between the utility and supplier, and the potential of
343 inconsistent information being provided to consumers.

344 Third, the POR Programs reduce the redundancy of collections expenditures and
345 enhance the success on collecting on unpaid accounts. This net cost reduction
346 will be passed on to customers through lower prices and more diverse products
347 offered by AGS.

348 Fourth, I am advised by counsel that there may be legal concerns with Mr.
349 McDaniel's proposal. Those concerns will be addressed in briefs.

350 **V. CONCLUSION**

351 **Q. Does this conclude your Rebuttal Testimony?**

352 **A.** Yes, it does.

NOTICE OF FILING

Please take note that on July 19, 2016, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Rebuttal 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 Rebuttal 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 July 19, 2016.

/s/ GERARD T. FOX
Gerard T. Fox