ILL. C. C. DOCKETS 16-0033/16-0034

ICEA/RESA EXHIBIT 2.1

RESPONSES OF THE CITIZENS UTILITY BOARD

ICEA/RESA DATA REQUESTS 1.03 AND 1.06

RESA-ICEA-CUB 1.03

Please describe in detail and provide all documents reviewed by Mr. McDaniel in preparation of this testimony, whether relied on or not.

RESPONSE:

Mr. McDaniel did not rely on specific documents in preparing his testimony, but rather his ten years of experience in various roles at CUB, including reviewing gas supply offers in Northern Illinois, and engaging with hundreds of consumers as a consumer counselor for CUB and through outreach events.

RESA-ICEA-CUB 1.06

Please refer to lines 143-145. What are the bases for Mr. McDaniel's opinion?

RESPONSE:

CUB responds that the testimony reflects Mr. McDaniel's anecdotal observations through his experience engaging with hundreds of consumers as a consumer counselor for CUB and through outreach events, as well as reviewing gas supply offers in Northern Illinois. Mr. McDaniel has observed that, if a low income consumer that has trouble paying his bills believes a marketing pitch that signing up with a supplier will reduce his bills, a sales pitch that infers savings that will result from signing up with the supplier serves as a significant inducement to sign up with that supplier. Furthermore, Mr. McDaniel has observed that many consumers, including low income consumers, who sign contracts with suppliers often sign up because they believe they will save money, not because they understand they will pay a premium for price stability.