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OFFICIAL FILE

July 21, 2000 I.C.C. DOCKET NO. 000367

Exhibit No. 20

Mr. R. Lawrence Warren
OFFICE OF THE ATTORNEY GENERAL
Public Utilities Bureau
100 W. Randolph St., 12th Floor
Chicago, IL 60601

Witness _____

Date 8/28/00 Reporter SG

Re: ComEd Decommissioning Proceedings
Illinois Commerce Commission Docket 00-0361

Dear Mr. Warren:

I am enclosing ComEd's responses to Attorney General's Third Set of Data Requests.

Very truly yours,



John L. Rogers, III

JLR/kb

cc: Conrad R. Reddick (w/ encls.)
Leijuana Doss (w/ encls.)
John C. Feeley (w/ encls.)
William Riley (w/ encls.)
Robert M. Ivanauskas (w/ encls.)
Edward C. Fitzhenry (w/ encls.)
Daniel Rosenblum (w/ encls.)
David I. Fein (w/ encls.)

COMMONWEALTH EDISON COMPANY
ILLINOIS COMMERCE COMMISSION DOCKET 00-0361
REPONSES TO ATTORNEY GENERAL DATA REQUEST NO. 3, ITEMS 19-27

AG-26. Referring to the responses to the Attorney General's First Set of Information Requests, Question 4, with regard to Byron 1, please explain what the "Disbursements" in 2035 represent. The response should include, but not be limited to, an explanation of why such disbursements for 2035 are forecasted, as no such costs appear in TSL-7, Section 4, Page 24 or TSL-9, Section 7, Page 6.

RESPONSE:

The disbursements in 2035 referred to in this request are not disbursements that TLG or ComEd forecast will be made. They represent the amounts that would remain at the end of the decommissioning process for Byron Unit One if all of the assumptions used in Docket No. 99-0115 remained the same through 2035 (i.e., all of the inherent financial risks described in the testimony of Randall Speck in Exhibit 4 are avoided), but the cost escalation rate were changed from 4.74% to 4.11% for the entire 35-year period. Even if the Genco avoids all of the significant risks of additional costs, however, no such remaining funds are forecasted to be available for distribution because the 4.11% cost escalation rate is not the escalation rate supported by the testimony in Docket No. 99-0115. The rate supported by the testimony in Docket No. 99-0115 is actually about 8%. The rate was reduced to 4.74% by applying a 10% "bandwidth" limitation on the low-level waste component of the escalation formula at the request of the Commission's staff. Given the much higher cost escalation rate supported by the evidence in Docket No. 99-0115, the 4.11% cost escalation rate is not the rate that ComEd believes is likely to be experienced between 2000 and 2035. The best available evidence, which was presented by ComEd in Docket No. 99-0115, indicates that there will be no excess funds available for disbursement from the Byron Unit One decommissioning trust funds in 2035.

The 4.11% escalation rate was used in the responses to the Attorney General's First Set of Information Requests, Question 4, because the request sought "all formula and calculations used to generate the \$120.933 million figure." If future decommissioning collections were limited to \$120.933 million for six years, 4.11% is the cost escalation rate that would have to be achieved in order for the trusts to be considered fully funded. As indicated in the Petition, the best available evidence from Docket No. 99-0115 is that costs will escalate at a higher rate and that six years of collections at a rate of \$120.933 million will result in a savings of over \$1 billion for customers when compared to the amounts that

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would otherwise have to be collected to fund decommissioning costs. The difference between the assumed escalation rate of 4.11% and the rate that is justified based on the record in Docket No. 99-0115 represents a part of the additional risk that the Genco will bear under ComEd's proposal.