

ICC Docket No. 05-0597
Commonwealth Edison Company's Response to
Staff's (SK) Data Requests 1.01 – 1.10
Dated: October 26, 2005

REQUEST NO. SK 1.02:

Please provide a detailed description of how the “Balance as of 12/31/04” and “Balance as of 6/30/05” were calculated for the following issues shown on WPD-3 pages 1, 2, 5, and 6: First Mortgage Bonds Series 46, 47, 48, 44, 50, 51, 55, 40, 66, 71, 56, 67, 30, 38, 60, 1985, 1985, 1974A, 57; Sinking Fund Debentures; and Pollution Control Obligations Joliet 1981, Peking 1981, Waukegan 1981, IEFA 1980, IEFA 1980, IEFA 1979, IEFA 1979, IEFA 1983, IEFA 1984, Pekin 1979, Waukegan 1979, Pekin Series B, Pekin/Joliet 1976, Waukegan B, Joliet Series B, Pekin Series 1979, and Joliet 1979.

Form 21 pages 24c and 24d shows an unamortized balance due to the generation-related portion of unamortized losses on reacquired debt written off in the fourth quarter of 1997 as a result of ComEd's discontinuance of SFAS No. 71. Please provide the balance as of 6/30/05.

Unamortized loss on reacquired debt - why are the unamortized loss / gain balances on Schedule D-3 Revised on pages 6 and 12 the same even though the “as of” time frames (6/30/05 and 12/31/04) differ?

Why are the following reacquired issues missing on Schedule D-3 Revised pages 6 and 12, First Mortgage Bond (FMB) Series 76 - \$5,000,000, Series 78 - \$93,979,000, Series 93 - \$62,090,000 and 6.40% Notes - \$127,976,000?

SUPPLEMENTAL RESPONSE:

The attached schedule SK 1.02 Attachment 2 contains the unamortized balance as of 6/30/05 as requested. The amount of the write-off as of 6/30/05 was \$24,801,233.

The balances represent losses on debt reacquired in 2004. The losses incurred on the reacquisition of debt were expensed in 2004. As a result, there has not been any actual amortization of those balances during the first six months of 2005. Upon receipt of Commission approval in this proceeding, these balances will be reclassified to Account 189 – Unamortized Losses on Reacquired Debt, and amortization will begin.

With respect to the four issues listed above, FMB Series 76, 78, 93 and the 6.40% Notes, the loss amounts on these four issues were excluded from Schedule D-3 Revised because the final maturity dates on these issues were in 2005 and 2006 (see footnote 4 on Schedule D-3 Revised pages 6 and 12), and as such, the amortization period for these issues would end before the rates in this proceeding take effect.