

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

ILLINOIS COMMERCE COMMISSION	:	
On Its Own Motion	:	
	:	
Investigation of Rider CPP of Commonwealth Edison Company, and Rider MV of Central Illinois Light Company d/b/a AmerenCILCO, of Central Illinois Public Service Company d/b/a AmerenCIPS, and of Illinois Power Company d/b/a AmerenIP, pursuant to Commission Orders regarding the Illinois Auction.	:	Docket No. 06-0800

**COMMONWEALTH EDISON COMPANY’S
COMMENTS ON PROPOSED WORKSHOP AGENDA**

Pursuant to the request of the Staff of the Illinois Commerce Commission in its role as workshop facilitator implementing the Commission’s direction concerning use of “workshops and other collaborative efforts” (Initiating Order at 5), Commonwealth Edison Company (“ComEd”) proposes that additions and revisions be made to the draft agenda of January 26, 2007, as shown in legislative format on Attachment A hereto.

These comments are ComEd’s and not those of the independent Auction Manager. ComEd understands that the Auction Manager will submit separate comments.

The fact that ComEd proposes, agrees with, or accepts including a topic on the agenda does not imply that ComEd supports any particular revision to the auction process or ComEd’s or Ameren’s tariffs with respect to that topic, nor that ComEd necessarily believes that any such revision is required. The need for and substance of any revision should be discussed at the workshops themselves.

Dated: January 30, 2007

Respectfully submitted,

Commonwealth Edison Company



By: _____
One of its Attorneys

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Preliminary Workshop Agendas

ICC Docket 06-0800

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February 2, 2007 Workshop

Use of an Auction

- For the Hourly Price section, plan on using the alternative procurement methods adopted following the September 2006 rejection of the HP Section auction results, until such time that such alternatives can be fully evaluated. [Staff]

Bidder Applications

- In order to facilitate the Part 2 Application process for suppliers, all modifications to pre- and post-auction security instruments that were accepted for the 2006 auction should also be accepted in the next auction so that only new revisions will be considered during the application process for the next energy auction. [Staff]
- In order to facilitate the Credit and Application Team's Part 1 and Part 2 application review process, the Part 1 Application should be modified to require suppliers to provide their Tangible Net Worth, show how they calculated it, and provide citations to their financial statements for each component of that calculation. [Staff]

Credit Issues

- Consider whether affiliated bidders should have separate or shared unsecured lines of credit. [Staff]

Enrollment Windows and Other Switching Rules

- In order to reduce the risk premiums included in auction prices, require an enrollment window for smaller non-residential customers and either require pre-commitment or shorten the enrollment period for large non-residential customers. [Staff]

- Also, in order to reduce the risk premiums included in auction prices, we recommend that the Commission modify ComEd customers' rights to leave fixed price electricity service. [Staff]

Fixed Price Product Supplier Contract Durations for Residential and Small Commercial Customer Groups

- In the next auction, for small to medium size customers, each utility should continue to secure multiple contract types. For example, such multiple contract types could include either overlapping time periods of three different lengths or sequential time periods of the same 12-month length. [Staff]

Customer Supply Group Definitions

- To the extent to which load data and switching data are available, Staff recommends that the issue of combining 400 kW to 1 MW customers with larger customers be reexamined in the first available investigation. [Staff]

Other Contract Change Proposals to Reduce Risk Borne by Bidders?

- ComEd recommends that clarifying changes should be made to the SFCs to reflect (a) changes in the dates applicable to future auctions and purchases, (b) changes in applicable PJM tariffs and charges since the 2006 auction; and (c) clarifications made in response to questions received and issues raised both internally and externally during the 2006 auction. [ComEd]

Other Tariff Change Proposals to Reduce Risk Borne by Bidders?

- The timeline should be revised to reduce the number of days between a Commission decision to approve auction results and the end of the applicable enrollment window. [ComEd]

Data Room Improvements

- CPP-A suppliers should be provided at an earlier time with a more certain estimate of CPP-A customer load that reflects the results of customer actions during the enrollment window. [ComEd]

February 15, 2007 Workshop

Post-Auction Commission Review of Results

- Staff should have one day to review the Auction Manager's Confidential Report to the Commission prior to submitting the Staff's Confidential Report to the Commission. [Staff]
- Tariff language regarding the calculation of the supply charges in the event the Commission initiates an investigation of the auction results should be clarified. [ComEd]

Confidentiality of Bidder Information

- Provide more definition in the tariffs about confidential treatment of information. [Staff]

Information Dissemination

- Improve Information Dissemination to Public. [Staff]

Creation of the ALJs' Issues List

- Discuss and then recruit somebody to draft.