

7. Process and Procedural Issues

The Commission adopts the processes and procedures described below to obtain input from interested parties, customers, and market actors on the Commission's efforts to oversee, develop, and implement PGC-funded energy efficiency programs. The Commission, the assigned Commissioner, the assigned Administrative Law Judge, or the Energy Division may utilize both formal and informal procedural vehicles to (1) revise this policy manual and/or any of its referenced documents as needed, (2) review on-going programs and adopt mid-course changes if warranted, (3) plan and develop future programs, and (4) resolve disputes among or complaints from various market participants.

Revisions to Policy Manual and Referenced Documents

The Commission may consider updates and revisions to this manual, in whole or in part, at any time, upon request by interested parties or on its own initiative, when deemed warranted. This manual may also be updated by the Assigned Commissioner, the Assigned Administrative Law Judge, or the Energy Division.

Review and Assessment of Current Programs

The Commission delegates to the Energy Division the responsibility for conducting regular forums or workshops, as needed, for interested parties, customers, and market actors to provide input and feedback on energy efficiency programs during the year.

Dispute Resolution and Consumer Protection

The Commission will require that any program proposal for energy efficiency funds describe a dispute resolution process to be used in dealing with complaints from end-use gas or electric consumers participating or attempting to participate in the program. In programs where the IOUs hold contracts with third parties, those contracts will also be required to include dispute resolution provisions.

The Commission's informal and formal complaint process through the Consumer Services Division is another venue, which customers and market actors may utilize to file complaints against IOUs, though this complaint process does not extend to other program implementers.

Finally, program implementers may use the name of the CPUC on marketing materials for their programs with the prior written approval from the CPUC Energy Division. In

order to obtain this written approval, implementers should send a copy of the planned materials to the Energy Division requesting approval to use the CPUC name and/or logo. Prior approval is not required if implementers use only and precisely the disclosure language required by the standard Agreement terms.

Procedural Schedule

The Commission will allocate and award program funding beginning in year 2002 and continuing through at least 2011 (when the legislative authorization for the electric PGC sunsets). Program funding duration will be determined by the Commission and will be detailed in Commission decision(s) to be issued before the beginning of each funding period, which is assumed to start in January.

Appendix A: Reference Documents

The following documents are referenced in this manual. Electronic (if available) or hard copies may be obtained by e-mailing a request, along with relevant contact information, to ee@cpuc.ca.gov. Copies also may be obtained by calling the Commission's Energy Efficiency Hotline at (415) 703-2776 and leaving a voice mail message with the request.

Title	Date of Publication	Available at:
Database for Energy Efficient Resources (DEER)	August 1, 2001	http://www.calmac.org or http://www.energy.ca.gov
International Performance Measurement and Verification Protocol (IPMVP)	October 1, 2000	http://www.ipmvp.org/info/download.html
Standard Practice Manual (SPM): Economic Analysis of Demand Side Management Programs	October 1, 2001	ee@cpuc.ca.gov ; (415) 703-2776; or at http://www.cpuc.ca.gov/static/industry/electric/energy+efficiency/rulemaking.htm
Instructions for Submission of Requests for Extension and Submission of New Proposals	August 2003	ee@cpuc.ca.gov ; (415) 703-2776; or at http://www.cpuc.ca.gov/static/industry/electric/energy+efficiency/rulemaking.htm
Proposal Workbook	August 2003	ee@cpuc.ca.gov ; (415) 703-2776; or at http://www.cpuc.ca.gov/static/industry/electric/energy+efficiency/rulemaking.htm
Agreement for Non-Utility Energy Efficiency Implementers (Standardized Contract Terms)	September 2003	ee@cpuc.ca.gov ; (415) 703-2776; or at http://www.cpuc.ca.gov/static/industry/electric/energy+efficiency/rulemaking.htm
Reporting Instructions	To be available before programs start	ee@cpuc.ca.gov ; (415) 703-2776; or at http://www.cpuc.ca.gov/static/industry/electric/energy+efficiency/rulemaking.htm

Appendix B: Common Terms on Energy Efficiency

As a guide in designing, developing and implementing energy efficiency programs, listed below are common program terms associated with energy efficiency. For definitions of terms, please refer to Appendix C (Glossary, definitions in alphabetical order).

Who's Who

Administrator

California Consumer Power and Conservation Financing Authority (CPA)

California Energy Commission

California Public Utilities Commission (Commission)

Community Choice Aggregators (CCAs)

Customer

Implementer

Large Investor-Owned Utilities (IOUs)

Parties or Interested Parties

Funding Sources

Electric Public Goods Charge (PGC)

Gas Public Goods Charge (PGC)

Program Types

The following are various types of programs that may be undertaken to achieve a public purpose objective. Not all the program types mentioned below are subject of this manual.

Cogeneration

Cross-Cutting Programs

Demand Responsiveness (See also Load Management)

Demand Side or Demand Side Management (DSM)

Distributed Generation

Energy Efficiency

Load Management

Local Program

Market Assessment and Evaluation Activities (See Market Assessment)

Self-Generation

Statewide Marketing and Outreach

Statewide Program

Program Implementation Terms

Energy Efficiency Measure
Market Barrier
Program
Program Design
Program Development
Program Management
Project

Program Strategies

Energy Management Services
Incentives
Information Programs
Rebates (Prescriptive/Customized)
Standard Performance Contract (SPC) Program
Upstream Programs

Market Segments

Each program proposal considered by the Commission is required to identify the market segment(s) that it is designed to address. These market segments are listed below and are designed to help the Commission address how well its portfolio of programs is addressing the variety of markets for energy efficiency products and services in the state.

Agricultural
Commercial
Industrial
Government
Residential - multi-family
Residential - single-family
Institutional
Schools
New Construction

Customer Segments/Types

Customers are generally divided into two major types: residential or nonresidential. Within those two broad categories, programs may be targeted to one or more sub-segments, as listed below.

Residential

Residential Customers
Residential Hard-to-Reach

Nonresidential

Large nonresidential
Medium nonresidential
Small nonresidential
Very small nonresidential
Nonresidential Hard-to-reach
Chain Account (Large/Small)

Cost Effectiveness

Basic terms associated with cost-effectiveness:

Cost-effectiveness
Participant Test
Peak Demand Period
Total Resource Cost Test-Societal Version

Appendix C: Glossary

(definitions in alphabetical order)

Administrator: A person, company, partnership, corporation, association, or other entity selected by the Commission and any Subcontractor that is retained by an aforesaid entity to contract for and administer energy efficiency programs funded in whole or in part from electric or gas public goods charge (PGC) funds. For purposes of implementing PU Code Section 381.1, an "administrator" is any party that receives funding for and implements energy efficiency programs pursuant to PU Code Section 381.

Administrative Services: The services to be provided by the administrator, separate from the limited implementation or other services an administrator may perform with prior approval of the Commission.

Affiliate: Any person, corporation, utility, partnership, or other entity 5% or more of whose outstanding securities are owned, controlled, or held with power to vote, directly or indirectly either by an administrator or any of its subsidiaries, or by that administrator's controlling corporation and/or any of its subsidiaries as well as any company in which the administrator, its controlling corporation, or any of the administrator's affiliates exert substantial control over the operation of the company and/or indirectly have substantial financial interests in the company exercised through means other than ownership. For purposes of these Rules, "substantial control" includes, but is not limited to, the possession, directly and indirectly and whether acting alone or in conjunction with others, of the authority to direct or cause the direction of the management of policies of a company. A direct or indirect voting interest of five percent (5%) or more by the administrator, its subsidiaries, or its Affiliates in an entity's company creates a rebuttable presumption of control.

Analysis Agent: An entity or entities selected to perform analytic functions such as strategic planning, market assessment, and evaluation.

California Board for Energy Efficiency (CBEE): An advisory board created by the California Public Utilities Commission in 1998 for overseeing energy efficiency programs. The board was subsequently disbanded in February 2000, but authored the previous version of the Commission's energy efficiency policy rules.

California Demand-Side Management Measurement Advisory Committee (CALMAC): An informal committee made up of utility representative, the Office of Ratepayer Advocates and the California Energy Commission. The purpose of the committee is to: provide a forum for presentations, discussions, and review of Demand Side Management (DSM) program measurement studies underway or completed; to coordinate the development and implementation of measurement studies common to

all or most of the utilities; and to facilitate the development of effective, state-of-the-art protocols for measuring and evaluating the impacts of DSM programs.

California Energy Commission (CEC): The state agency charged with statewide power plant siting, supply and demand forecasting, as well as multiple types of energy analysis.

California Consumer Power and Conservation Financing Authority (CPA): The state agency charged with the responsibility to ensure sufficient electricity at reasonable market prices.

California Public Utilities Commission (Commission): The state agency charged with regulating California Investor-Owned Utilities (IOUs), and with overseeing ratepayer-funded public purpose energy efficiency programs.

Chain Account: A nonresidential customer with two or more accounts that have the same billing address and same customer name but with more than one service address.

Large chain: a chain whose total aggregated demand over all customer accounts is greater than 500 kW, or whose annual gas consumption is greater than 250,000 therms.

Small chain: a chain whose total aggregated demand over all customer accounts is less than or equal to 500 kW, or whose annual gas consumption is less than or equal to 250,000 therms.

Cogeneration: A process in which a facility uses its waste energy to produce heat or electricity.

Comprehensive: A program or project designed to achieve all cost-effective energy efficiency activities in individual buildings, usually including multiple energy efficiency measures.

Community Choice Aggregators (CCA): As provided in PU Code Section 331.1, a CCA is any of the following entities, if that entity is not within the jurisdiction of a local publicly owned electric utility that provided electrical service as of January 1, 2003:

- a) Any city, county, or city and county whose governing board elects to combine the loads of its residents, businesses, and municipal facilities in a community wide electricity buyers' program.
- b) Any group of cities, counties, or cities and counties whose governing boards have elected to combine the loads of their programs, through the formation of a joint powers agency established under Chapter 5 (commencing with Section 6500) of Division 7 of Title I of the Government Code.

Cost-Effectiveness: An indicator of the relative performance or economic attractiveness of any energy efficiency investment or practice when compared to the costs of energy produced and delivered in the absence of such an investment. In the energy efficiency field, the present value of the estimated benefits produced by an energy efficiency program as compared to the estimated total program's costs, from the perspective of either society as a whole or of individual customers, to determine if the proposed investment or measure is desirable from a variety of perspectives, e.g., whether the estimated benefits exceed the estimated costs. See Total Resource Cost Test - Societal Version and Participant Cost Test (below).

Cream Skimming: Cream skimming results in the pursuit of only the lowest cost or most cost-effective energy efficiency measures, leaving behind other cost-effective opportunities. Cream skimming is inappropriate when lost opportunities are created in the process.

Cross-Cutting Program: A program that involves any or all of the following: multiple customer types (residential and/or nonresidential), and/or multiple building types (retrofit, remodeling, and/or new construction).

Customer: Any person or entity that pays an electric and/or gas bill to an IOU and that is the ultimate consumer of goods and services including energy efficiency products, services, or practices.

Customer Information: Non-public information and data specific to a Utility Customer which the utility acquired or developed in the course of its provision of Utility Services.

Demand Responsiveness: See also, Load Management. Also sometimes referred to as load shifting. Activities or equipment that induce consumers to use energy at different (lower cost) times of day or to interrupt energy use for certain equipment temporarily, usually in direct response to a price signal. Examples: interruptible rates, doing laundry after 7 p.m., air conditioner cycling programs.

Demand Side or Demand Side Management (DSM): Programs that reduce the use of energy by the use of energy efficiency products, services, and practices, or that change the timing of energy use.

Distributed Generation: Small-scale electric generating technologies installed at or near an end-user's location. May also be referred to as "distributed energy resources" or "distributed resources."

Double-dipping: Taking advantage of multiple financial incentives offered by multiple programs for undertaking only one activity.

Electric Public Goods Charge (PGC): Per Assembly Bill (AB) 1890, a universal charge applied to each electric utility Customer's bill to support the provision of public goods. Public goods covered by California's electric PGC include public purpose energy efficiency programs, low-income services, renewables, and energy-related research and development. This manual applies only to energy efficiency PGC funds.

Energy Efficiency: The use of high-efficiency products, services, and practices or an energy-using appliance or piece of equipment, to reduce energy usage while maintaining a comparable level of service when installed or applied on the Customer side of the meter. Energy efficiency activities typically require permanent replacement of energy-using equipment with more efficient models. Examples: refrigerator replacement, light fixture replacement, cooling equipment upgrades.

Energy Efficiency Measure: Any product, service, or practice or an energy-using appliance or piece of equipment that will result in reduced energy usage at a comparable level of service when installed on the Customer side of the meter.

Energy Management Services: Programs intended to provide customer assistance in the form of information on the relative costs and benefits to the customer of installing measures or adopting practices which can reduce the customer's utility bills. The information is solicited by the customer and recommendations are based on the customer's recent billing history and/or customer-specific information regarding appliance and building characteristics.

Evaluation: The performance of studies and activities aimed at determining the effects of a program, including program-induced changes in energy efficiency markets, energy savings, and program cost-effectiveness.

Gas Public Goods Charge: Created by AB1002 in 2000, an unbundled rate component included on gas customer bills to fund public purpose programs including energy efficiency, low-income and research and development. This policy manual applies only to the energy efficiency portions of the gas PGC.

"Hardware" Programs: Programs primarily intended to provide measurable energy savings through installation of energy efficiency measures or provision of energy efficiency services.

HVAC: Heating, Ventilation, and Air Conditioning Systems. Used in discussing replacement of inefficient equipment with high-efficiency equipment.

Implementer: An entity or person selected and contracted with or qualified by a program administrator or by the Commission to receive PGC funds for providing products and services to Customers.

Incentives: Financial support (e.g., rebates, low-interest loans) to install energy efficiency measures. The incentives are solicited by the customer and based on the customer's billing history and/or customer-specific information. See also Rebates, SPC programs, and Upstream programs.

Information Programs: Programs primarily intended to provide customers with information regarding generic (not customer-specific) conservation and energy efficiency opportunities. For these programs, the information may be unsolicited by the customer. Programs that provide incentives in the form of unsolicited coupons for discount on low cost measures are also included.

Large Investor-Owned Utilities (IOUs): Pacific Gas and Electric (PG&E), San Diego Gas and Electric (SDG&E), Southern California Edison (SCE), and Southern California Gas (SoCalGas).

Load Management: Sometimes referred to as load shifting. Activities or equipment that induce consumers to use energy at different (lower cost) times of day or to interrupt energy use for certain equipment temporarily. Examples: interruptible rates, doing laundry after 7 p.m., air conditioner cycling programs.

Local Program: A program that provides services to customers in only one jurisdiction of the state (e.g., one county, city, or region). Local programs may be experimental and are designed to serve the needs of a particular geographic area.

Lost Opportunities: Energy efficiency measures that offer long-lived, cost-effective savings that are fleeting in nature. A lost opportunity occurs when a customer does not install an energy efficiency measure that is cost-effective at the time, but whose installation is unlikely to be cost-effective (or is less cost-effective) later.

Market Actors: Individuals and organizations in the production, distribution, and/or delivery chain of energy efficiency products, services and practices. This may include, but is not limited to, manufacturers, distributors, wholesalers, retailers, vendors, dealers, contractors, developers, builders, financial institutions, and real estate brokers and agents.

Market Assessment: An analysis function which provides an assessment of how and how well a specific market or market segment is functioning with respect to the definition of well-functioning markets or with respect to other specific policy objectives. Generally includes a characterization or description of the specific market or market segments, including a description of the types and number of buyers and sellers in the market, the type and number of transactions that occur on an annual basis, and the extent to which energy efficiency is considered an important part of these transactions by market participants. This analysis may also include an assessment of whether or not a market has been sufficiently transformed to justify a reduction or elimination of

specific program interventions. Market assessment can be blended with strategic planning analysis to produce recommended program designs or budgets. One particular kind of market assessment effort is a *baseline study*, or the characterization of a market before the commencement of a specific intervention in the market, for the purpose of guiding the intervention and/or assessing its effectiveness later.

Market Barrier: Any characteristic of the market for an energy-related product, service, or practice that helps to explain the gap between the actual level of investment in, or practice of, energy efficiency and an increased level that would appear to be cost-beneficial to the consumer.

Market Effect: A change in the structure or functioning of a market or the behavior of participants in a market that is reflective of an increase in the adoption of Energy-Efficient products, services, or practices and is causally related to Market Interventions.

Market Event: The broader circumstances under which a Customer considers adopting an energy efficiency product, service, or practice. Types of market events include, but are not necessarily limited to, the following: (i) *new construction*, or the construction of a new building or facility; (ii) *renovation*, or the updating of an existing building or facility; (iii) *remodeling*, or a change in an existing building; (iv) *replacement*, or the replacement of equipment, either as a result of an emergency such as equipment failure, or as part of a broader planned event; and, (v) *retrofit*, or the early replacement of equipment or refitting of a building or facility while equipment is still functioning, often as a result of an intervention into energy efficiency markets.

Market Participants: The individuals and organizations participating in transactions with one another within an energy efficiency market or markets, including Customers and Market Actors.

Market Segments: Each program proposal considered by the Commission is required to identify the market segment(s) that it is designed to address. These market segments are listed below. These market segments are simply to help the Commission assess how well its portfolio of programs is addressing the variety of markets for energy efficiency products and services in the state.

- Agricultural
- Commercial
- Industrial
- Government
- Residential - multi-family
- Residential - single-family
- Institutional
- Schools
- New Construction

New Construction: Residential and non-residential buildings that have been newly built or have added major additions subject to Title 24, the California building standards code.

Nonresidential: Facilities used for business, commercial, agricultural, institutional, and industrial purposes. Nonresidential customers are further divided into the following subsectors, on the basis of annual electric demand or annual gas consumption:

Large nonresidential: Customers whose annual electric demand is greater than 500 kW, or whose annual or annualized gas consumption is greater than 250,000 therms, or both

Medium nonresidential: Customers whose annual electric demand is between 100 kW and 500 kW, or whose annual or annualized gas consumption is between 50,000 therms and 250,000 therms, or both

Small nonresidential: Customers whose annual electric demand is between 20 kW and 100 kW, or whose annual gas consumption is between 10,000 therms and 50,000 therms, or both

Very small nonresidential: Customers whose annual electric demand is less than 20 kW, or whose annual gas consumption is less than 10,000 therms, or both.

Nonresidential Hard-to-Reach: Those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a language, business size, geographic, or lease (split incentive) barrier. These barriers are defined as:

- Language - Primary language spoken is other than English, and/or
- Business Size - Less than ten employees and/or classified as Very Small (as defined above), and/or
- Geographic - Businesses in areas other than the San Francisco Bay Area, San Diego area, Los Angeles Basin or Sacramento, and/or
- Lease - Investments in improvements to the building benefit the business only during the lease period; landlords benefit longer.

Participant Test: A cost-effectiveness test intended to measure the cost-effectiveness of energy efficiency programs from the perspective of electric and/or gas customers (individuals or organizations) participating in them.

Parties or Interested Parties: Persons and organizations with an interest in energy efficiency that comment on or participate in the Commission's efforts to develop and implement ratepayer-funded energy efficiency programs.

Peak Demand Period: Noon to 7 p.m. Monday through Friday, June, July, August, and September.

Performance Measurement: The determination of the extent to which a person, organization, or program is successfully meeting specified goals and objectives.

Portfolio: All IOU and non-IOU energy efficiency programs implemented during a program year and funded through the PGC.

Process Overhaul: Modifications to industrial or agricultural processes to improve their energy use characteristics.

Program: An activity, strategy, or course of action undertaken by an implementer or administrator using PGC funds. Each program is defined by a unique combination of program strategy, market segment, marketing approach, and energy efficiency measure(s) included.

Program Design: The method or approach for making, doing, or accomplishing an objective by means of a program.

Program Development: The process by which ideas for new or revised energy efficiency programs are converted into a design to achieve a specific objective.

Program Management: The responsibility and ability to oversee and guide the performance of a program to achieve its objective.

Project: An activity or course of action undertaken by an implementer involving one or multiple energy efficiency measures, usually at a single site.

Project Development: The process by which an implementer identifies a strategy or creates a design to provide energy efficiency products, services, and practices directly to Customers.

Proportional Share: For purposes of implementing PU Code Section 381.1, "proportional share" refers to the average per capita share of all the utility's Public Goods Charge energy efficiency program funding that occurred statewide in the previous year times the population in a CCA's territory. The average per capita share shall be determined using the latest California population listed in E-1 City/County Population Estimates published by the California Department of Finance Demographic Unit.

Rebates: Energy efficiency programs consisting of an agreement between the administrator or implementer and a number of customers to install one or more identified energy efficiency products at the customer facility for an identified and pre-specified amount of money. There are two types of rebates:

Prescriptive Rebate: A prescribed financial incentive per unit for a prescribed list of individual products.

Customized Rebate: A program where the financial incentive is determined using an analysis of the customer's existing equipment and an agreement on the specific products to be installed.

Remodeling: Modifications to the characteristics of an existing residential or nonresidential building or energy-using equipment installed within it.

Renovation: Modifications to the characteristics of an existing residential or nonresidential building itself, including, but not limited to, windows, insulation, and other modifications to the building shell.

Residential Customers: Existing single family residences, multi-family dwellings (whether master-metered or individually metered), and buildings that are essentially residential but used for commercial purposes, including, but not limited to, time shares and vacation homes.

Residential Hard-to-Reach: Those customers who do not have easy access to program information or generally do not participate in energy efficiency programs due to a language, income, housing type, geographic, or home ownership (split incentives) barrier. These barriers are defined as:

- Language – Primary language spoken is other than English, and/or
- Income – Those customers who fall into the moderate income level (income levels less than 400% of federal poverty guidelines), and/or
- Housing Type – Multi-Family and Mobile Home Tenants, and/or
- Geographic – Residents of areas other than the San Francisco Bay Area, San Diego area, Los Angeles Basin or Sacramento, and/or
- Homeownership – Renters

Retrofit: Energy efficiency activities undertaken in existing residential or nonresidential buildings where existing inefficient equipment is replaced by efficient equipment.

Self-Generation: Distributed generation installed on the customer's side of the utility meter, providing electricity for that customer's on-site electric load without exporting electricity for sale.

Small and/or Multi-Jurisdictional Investor Owned Utilities (IOUs): Any or all of the following IOUs that serve customers in the state of California: Avista Utilities, Bear Valley Electric, PacifiCorp, Sierra Pacific Power, and Southwest Gas Company.

Standard Performance Contract (SPC) Programs: Programs consisting of a set of agreements between the administrator or implementer and a number of project sponsors (either Implementers or Customers) to deliver energy savings from the installation of energy efficiency measures and technologies at a facility or set of facilities. These agreements are for a pre-specified price per unit of energy savings, measured using a pre-specified set of Measurement and Verification (M&V) protocols. An SPC program is an open-ended offer with a pre-specified price and set of terms.

Statewide Marketing and Outreach Programs: Programs that convey consistent statewide messages to individual consumers through mass-market advertising campaign.

Statewide Program: A program available in the service territories of all four large IOUs, with identical implementation characteristics in all areas, including incentives and application procedures.

Subcontractor: A person or entity who has a secondary contract undertaking some obligations of another contract executed by another person or entity.

Total Resource Cost Test - Societal Version. A cost-effectiveness test intended to measure the overall cost-effectiveness of energy efficiency programs from a societal perspective.

Upstream Programs: Programs that provide information and/or financial assistance to entities in the delivery chain of high-efficiency products at the retail, wholesale, or manufacturing level.

Utility: Any public utility subject to the jurisdiction of the Commission as an Electrical Corporation or Gas Corporation, as defined by California Public Utilities Code Sections 218 and 222.

Utility Services: Regulated Utility Services including gas and electric energy sales, transportation, generation, distribution or delivery, and other related services, including, but not limited to, administration of Demand Side Services, scheduling, balancing, metering, billing, gas storage, standby service, hookups and changeovers of service to other energy suppliers.

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.02:

Please provide copies of all documents relied upon by any witness(es), including but not limited to workpapers, in preparing responsive testimony submitted on your behalf in Docket No. 07-0540 on December 14, 2007.

Response:

With respect to Mr. Stephens, all documents relied on by Mr. Stephens have either been provided by ComEd in the course of this Docket or are clearly referenced in Mr. Stephens' testimony and are available from public sources.

With respect to Mr. Stowe, the workpapers are included in the attached electronic spreadsheet (IIEC-ComEd 1.02 Att.). All documents relied on by Mr. Stowe have either been provided by ComEd in the course of this Docket or are clearly referenced in Mr. Stowe's testimony and are available from public sources.

Submitted by: Robert Stephens/David Stowe
Date: December 20, 2007

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**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.03:

Please explain the basis for, and provide any supporting studies, analyses, and data concerning, the statement on page 11, lines 186-188 of the Direct Testimony of Mr. Stephens that "[t]he customers who benefit most from the energy efficiency and demand response programs are those who see direct energy or demand cost savings through participation in the programs."

Response:

The basis for the statement is the simple fact that customers who participate in the associated energy efficiency or demand response programs will receive some form of inducement, whether monetary or otherwise, to participate in the program. In addition, these participating customers presumably will reduce their energy or demand consumed, which will result in reduced energy and/or delivery service bills, all other factors held equal. In addition, there may be other direct benefits for participants that are not easily quantifiable, such as tax savings or favorable public relations.

Other benefits that are potentially obtainable are secondary or indirect benefits. These benefits, in theory, are attainable by both participants and non-participants. For example, to the extent the energy efficiency programs have an impact on regional wholesale power prices, such impact, if perceptible, presumably would affect both participants and non-participants. Thus, customers who participate in the energy efficiency and/or demand response programs get both direct and secondary or indirect benefits, if any, not just the secondary or indirect benefits, if any, that may be available to non-participants.

Submitted by: Robert Stephens
Date: December 20, 2007

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.04:

With respect to page 11, lines 186-188 of the Direct Testimony of Mr. Stephens, please define the term "benefit", and explain both what "benefit" customers will realize and whether "benefits" inure to anyone other than customers. Please explain the basis for, and provide any supporting studies, analyses, and data concerning, IIEC's conclusion.

Response:

In the referenced passage of Mr. Stephens' testimony, the term "benefit" is used as a verb. Mr. Stephens intends no special meaning of the verb "benefit" and agrees with the Merriam-Webster on-line definition: "to be useful or profitable to." The energy efficiency programs within the ComEd plan are most useful and profitable to the customers who receive the program inducements and can achieve energy or demand cost savings.

With respect to what benefit customers will realize through the energy efficiency and demand response plans, please see response to Question No. 1.03.

Mr. Stephens has not attempted to fully evaluate whether "benefits" inure to anyone other than customers. However, potential entities that may benefit include ComEd and DCEO, who may receive both monetary and public relations benefits from administering the programs; energy efficiency equipment vendors and installers; and entities involved in energy efficiency program design and evaluation.

Submitted by: Robert Stephens

Date: December 20, 2007

Commonwealth Edison Company
Docket No. 07-0540

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.05:

With respect to the list of programs on page 9, line 179 through page 10, line 196 of the Direct Testimony of Mr. Stowe, please verify whether the "Energy Star Monthly Billing Usage," "EIO Data Profiler" and "Smart Energy Design Assistance" programs are residential programs. If not, please explain how this affects Mr. Stowe's analysis and conclusions.

Response:

1. IIEC assumes that the requestor intended to write "Energy Star Monthly Building Usage" program since the Company's plan never references an "Energy Star Monthly Billing Usage" program. The Energy Star Monthly Building Usage program was intentionally included in the residential program for the following reasons:
 - a. The Company's plan uses the phrase "Energy Star" nearly two dozen times. Of these, a few simply provide the program name in various tables or lists and no program description is provided.
 - b. Of the approximately 20 remaining references to "Energy Star," eight are used in describing the Residential Advanced Lighting Package, and three more are used in the description of the Residential Lighting program.
 - c. The phrase is used twice in connection with the Residential Appliance Recycling program and once each in reference to a residential appliance, residential HVAC tune-up, single family home performance, and Lights for Learning wherein Energy Star qualified CFL will be sold (presumably to family members) through schools. The phrase appears twice in contexts unclear as to the nature of the program.
 - d. The only clear reference connecting the phrase "Energy Star" with building usage specifically describes tenant buildings, which are a type of multi-family residential facility.
2. I assume that the requestor intended to write "EIO Data Interval Profiler" instead of "EIO Data Profiler." Apart from a program name that appears in two tables, the phrase "EIO Data Interval Profiler" does not appear in the Company's plan. The sole reference to "interval data" apart from the program name in the two tables is on page 8 of the Plan, and excerpted below:

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Response to Question No. 1.05 (continued):

"Meter interval data will be available to those customers who are equipped with existing recorder type meters. This offering will not include any meter exchanges. The data will be provided to those who request it and who participate in ComEd's energy efficiency programs. Such data can be used to analyze consumption trends and load profiles. Identifying trends and load profiles are useful in discovering energy saving opportunities and potential waste avoidance."

As can be seen, no mention of a specific class of customer is associated with this program. It appears reasonable, then, that the costs of this program could be applied to all classes of customers, on the basis of total program costs. This change is provided in the attached spreadsheet (IIEC-ComEd 1.05 Att.).

3. The "Smart Energy Design Assistance" program appears as part of the C&I Prescriptive and C&I Custom programs. The costs associated with the program were erroneously applied to the Residential class, and should be properly applied to the Small C&I and Large C&I classes. The two tables below show the minor net effect of both changes.

<u>Class</u>	<u>As Filed</u>			<u>After Change</u>		
	<u>2008</u>	<u>2009</u>	<u>2010</u>	<u>2008</u>	<u>2009</u>	<u>2010</u>
Residential	0.0634	0.1230	0.1794	0.0602	0.1180	0.1735
Small C&I	0.0436	0.0810	0.1399	0.0455	0.0844	0.1444
Large C&I	0.0199	0.0562	0.0776	0.0207	0.0570	0.0781

Submitted by: David Stowe
Date: December 20, 2007

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.06:

With respect to the statement on page 9, lines 244-46 of the Direct Testimony of Mr. Stowe that he "allocated 90% of the C&I and Public Sector Prescriptive program costs to the Small C&I class, and the remaining 10% to the Large C&I class," please verify whether Mr. Stowe accounted for the redundancy of measures. If not, please explain how this affects Mr. Stowe's analysis and conclusions.

Response:

IIEC assumes the requestor intended to refer to page 12, lines 244-246.

The Company provided data depicting many hundreds of individual measures. From my review of this data, it became clear that multiple measures used the same technology, but that factors other than the technology distinguished the measures. For example, while the "13 Watt Modular CFL" technology was redundant (i.e., used in many different environments such as Large Office, Large Retail, Food Sales, etc.), the underlying assumptions pertaining to those various environments distinguished the measures. My analysis accounted for every measure (i.e., a certain technology used in a particular environment) providing a TRC above the threshold. Redundancy of measures would not alter my analysis or conclusions.

Submitted by: David Stowe
Date: December 20, 2007

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.07:

With respect to page 13, line 280 through page 14, line 284 of the Direct Testimony of Mr. Stowe, please provide the basis for his decision to allocate 100% of the costs of the C&I New Construction program to the Small C&I class.

Response:

The basis for the decision to allocate 100% of the costs of the C&I New Construction program to the Small C&I class is described in my testimony, page 13 line 280 through page 14, line 284, excerpted below:

"In my review of the program descriptions, and by filtering the spreadsheet of measures in a manner similar to what I've described above, I found 2 measures were included in the C&I New Construction program. Both were applicable to large office facilities as indicated by the "SubDivision" column. Therefore, I allocated 100% of these program costs to the Small C&I class." [emphasis added]

While it is possible for office facilities to exceed 1 MW in demand, in my experience, this would be the exception rather than the rule. If a small portion of this minor program investment of \$100,000 were to be associated with the Large C/I class, it would have a *de minimis* impact on the estimated recovery charges.

Submitted by: David Stowe
Date: December 20, 2007

Commonwealth Edison Company
Docket No. 07-0540

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.08:

Please explain the basis for, and provide any supporting studies, analyses, and data supporting your belief that only industrial customers are large C/I, and please provide a definition of large C/I customers.

Response:

It is not my understanding or belief that only industrial customers are Large C&I as implied by the question. Rather, it is my belief that the Large C&I class is primarily industrial. This belief is supported and confirmed by a number of alternate sources.

1. The Small C&I class definitions were determined by IIEC witness Robert Stephens. Please refer to his testimony beginning on page 6, line 128 and continuing through page 7, line 141.
2. In addition to the sources cited by Mr. Stephens, the biannual filing by Edison Electric Institute of the "Typical Bills and Average Rates Report," provides the following definition on page xiv:

"Notes: Bundled and Unbundled Typical Bills: 1) On January 2, 2007 new rates went into effect for ComEd. The distribution delivery service components of a typical bill are the same for undled [sic] as they are for unbundled. Generally for trundled [sic], the generation component reflects that costs ComEd incurs to procure energy supply from winning bidders in the Illinois Auction. 2) The delivery service component also includes Rider FCA (Franchise cost addition), Rider RCA (retail customer assessment) and Rider ECR (environmental cost recovery). 3) Customers at 50 MW would typically be considered competitively declared and have hourly pricing for the generation component. For these customers, the generation proton [sic] was left blank. Also, it is assumed that these customers are served at high voltage. Average Rates (revenue and sales): 4) For 2006, a set of bundled average rates and a set fo [sic] unbundled average rates are provided for rates that were effectice [sic] during 2006. The Unbundled Average Rates reflect only those unbundled customers on ComEd's Power Purchase Option. 5) Commercial includes and [sic] nonresidential customer with demand =< 1 MW. Industrial includes any nonresidential customer with demand > 1MW. 6) Total Retail Average Rates include additional revenue classes not included with Residential, Commercial, and Industrial. (emphasis added)

Submitted by: David Stowe
Date: December 20, 2007

**Commonwealth Edison Company
Docket No. 07-0540**

IIEC's Responses to Commonwealth Edison Company's First Data Request

Question No. 1.09:

With respect to the Direct Testimony of Mr. Stowe, please provide any supporting studies, analyses and data concerning the breakdown between large commercial and large industrial customers.

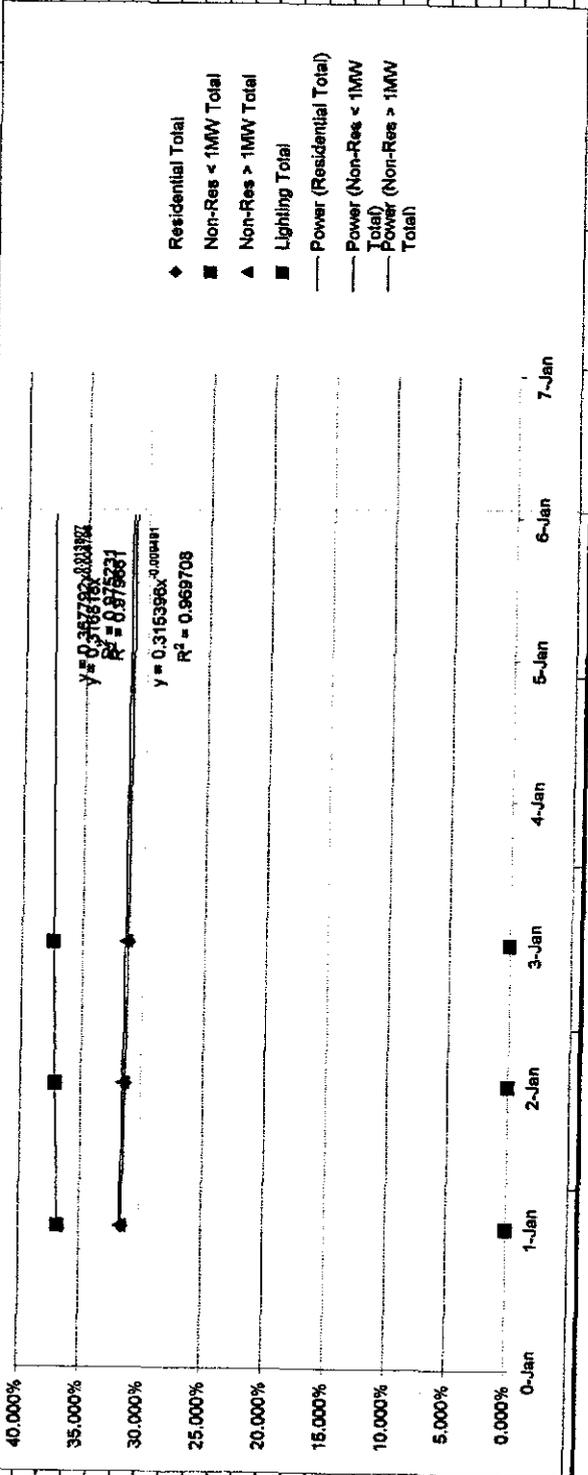
Response:

Please refer to IIEC's Response to Question No. 1.02, including attachment.

Submitted by: David Stowe
Date: December 20, 2007

	AJ
1	Average Total Cost for Electric Service (\$/kWh)
2	
3	11.066
4	11.944
5	8.188
6	8.585
7	10.972
8	
9	12.722
10	9.533
11	8.797
12	8.274
13	21.393
14	6.249
15	7.705
16	8.968
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18	8.156
19	7.470
20	7.757
21	6.963
22	7.796
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24	9.221
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	A	B	C	D	E	F	G	H	I	J
50	6/1/07-6/31/08	31.366%	37.061%	31.552%	0.000%	2				
51	6/1/08-6/31/09	31.182%	37.374%	31.434%	0.000%	3				
52	6/1/09-6/31/10	31.182%	36.879%	31.434%	0.798%	4				
53	6/1/10-6/31/11	31.138%	36.671%	31.396%	0.798%	5				
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Table 2. Portfolio Description

Projected Annual Totals

ANNUAL TARGET

	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W
	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15
	3-509	8/100-53/110	8/100-53/110	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111	8/100-53/111
	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)	Projected Retail Revenues (\$)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)	Projected Retail Revenues (\$)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)	Projected Retail Revenues (\$)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/MWh)
2	28,299,849	10.972	#REF!	28,595,018	29,289,948.000	\$0	29,877,845	0.000							
3	34,172,805	0.932	#REF!	34,706,896	34,172,805.000	\$0	35,186,799	0.000							
4	28,618,822	7.788	#REF!	28,824,543	28,618,822.000	\$0	30,125,358	0.000							
5	747,850	9.170	#REF!	785,020	747,850.000	\$0	785,158	0.000							
6	83,797,808	9.221	#REF!	94,880,177	83,797,808.000	\$0	95,952,938	0.000							
7															
8															
9															
10															
11															
12															
13															
14	EDA (\$/MWh)	Total Recovered	Collect - PC	Recover as % of Rev.	Annual EE Cost	Increase Under ComEd's Plan									
15	Annual	(\$)													
16	0.0008	18,568,458	132,737	0.56%	\$ 38,370,000		0.001347273								
17	0.0012	36,392,602	127,416		\$ 81,650,000		0.002785281								
18	0.0018	53,890,768	255,678		\$ 128,680,000		0.00428045								
19	0.0024	71,388,934	384,039		\$ 166,710,000										
20	0.0030	88,887,100	512,400	0.50%	\$ 39,370,000										
21	0.0036	106,385,266	640,761		\$ 81,650,000										
22	0.0042	123,883,432	769,122		\$ 128,680,000										
23	0.0048	141,381,598	897,483	0.26%	\$ 38,370,000										
24	0.0054	158,879,764	1,025,844		\$ 81,650,000										
25	0.0060	176,377,930	1,154,205		\$ 128,680,000										
26															
27															
28															
29															
30															
31															
32															
33															
34	Collected by														
35	IEC's Plan														
36	18,568,458														
37	36,392,602														
38	54,215,204														
39	72,037,806														
40	90,860,408														
41	109,683,010														
42	128,505,612														
43	147,328,214														
44	166,150,816														
45	184,973,418														
46	203,796,020														
47	222,618,622														
48	241,441,224														
49	260,263,826														
50	279,086,428														
51	297,909,030														
52	316,731,632														
53	335,554,234														
54	354,376,836														
55	373,199,438														
56	392,022,040														
57	410,844,642														
58	429,667,244														
59	448,489,846														
60	467,312,448														
61	486,135,050														

Table 5: Estimated Unit Charges for Cost

Class	2008	2009	2010
Residential	0.0634	0.1230	0.1794
Small C&I	0.0436	0.0810	0.1399
Large C&I	0.0199	0.0562	0.0775

C34. This causes the joint costs to be those costs are found, the column filed PC as from PC Alloc. Calc should be copied into Program Costs.

Cell: F9

Comment: David L Stowe:
EDA - Energy Efficiency and Demand Response Adjustment (cents/kWh) rounded to thousandths, applied to each kWh delivered.
PC - Projected Costs in \$
RIC - Reimbursements of Incremental Costs.
ARF - Automatic Reconciliation Factor (\$) = cumulative over or under collection resulting from the application of then applicable EDAs
ORF - Ordered Reconciliation Factor (\$) = amt order by the ICC to be refunded/collected.
UF - Uncollectible Factor = 1.0072 based on Rider UF if/when approved by the ICC for customers on rate BES-H
PE - Projected Energy (kWh) = projection of power and energy

Cell: G14

Comment: David L Stowe:
Projected Costs in \$

Cell: D14

Comment: David L Stowe:
Reimbursements of Incremental Costs.

Cell: E14

Comment: David L Stowe:
Automatic Reconciliation Factor (\$) = cumulative over or under collection resulting from the application of then applicable EDAs

Cell: F14

Comment: David L Stowe:
Ordered Reconciliation Factor (\$) = amt order by the ICC to be refunded/collected.

Cell: G14

Comment: David L Stowe:
Uncollectible Factor = 1.0072 based on Rider UF if/when approved by the ICC for customers on rate BES-H

Cell: H14

Comment: David L Stowe:
Projected Energy (kWh) = projection of power and energy

Cell: I14

Comment: David L Stowe:
Energy Efficiency and Demand Response Adjustment (cents/kWh) rounded to thousandths, applied to each kWh delivered.

Cell: C16

Comment: David L Stowe:
Program Costs are calculated from the next tab. All programs costs for Residential programs are allocated to Residential totals. Programs for Commercial and Industrial customers are split between the <1MW and >1MW classes as shown in the yellow box below. These percentages are assumed and may be changed. To do so, enter the percentage of participation for the < 1 MW class only; the > 1MW class will adjust automatically.

Finally, program costs for programs which apply equally to all classes of customers are allocated based on the energy allocation factors shown in the multi colored box below.

Figure 1: 2008 ComEd Proposed Program Cost Recovery - by class

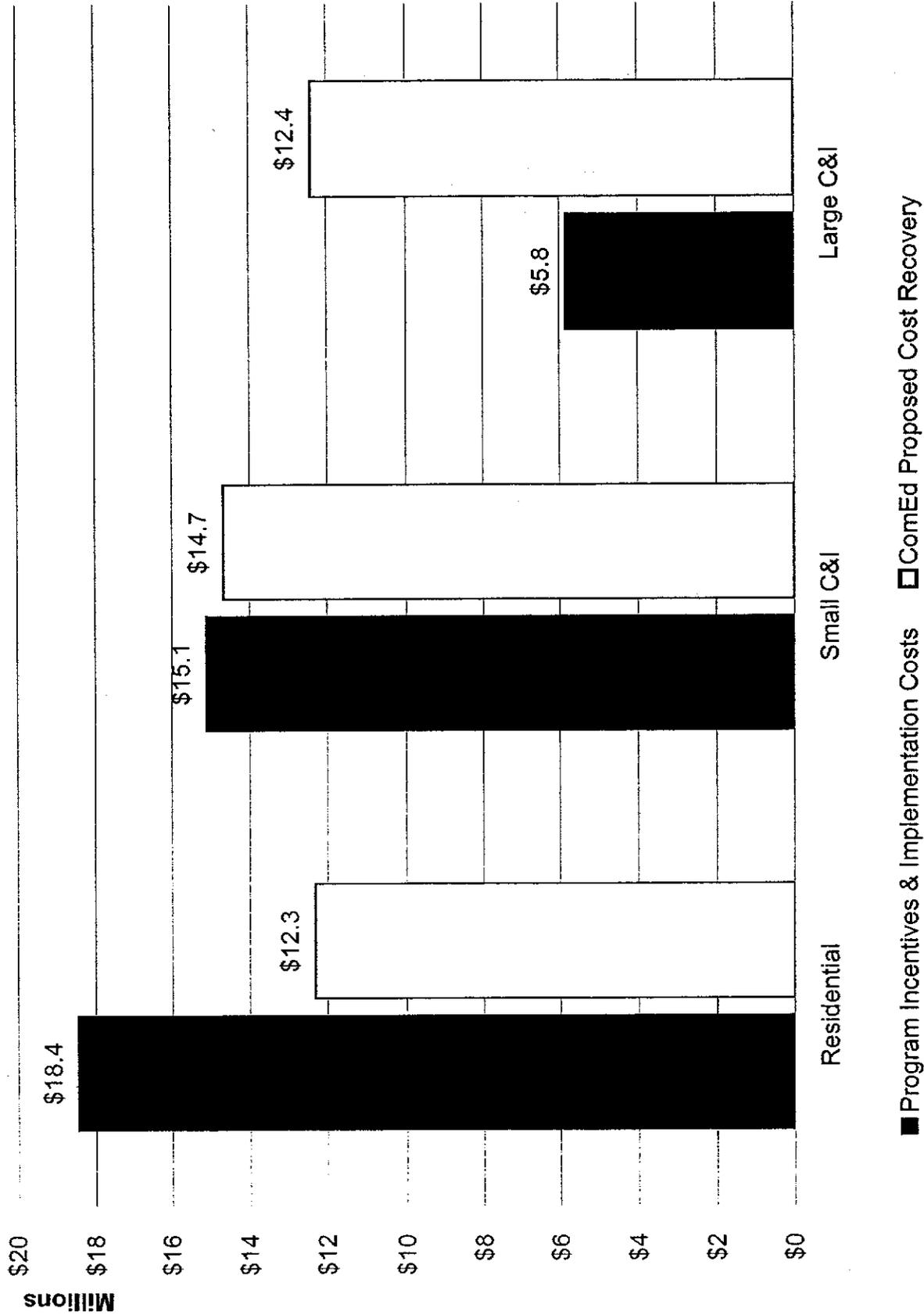


Figure 2: 2009 ComEd Proposed Program Costs and Recovery - by class

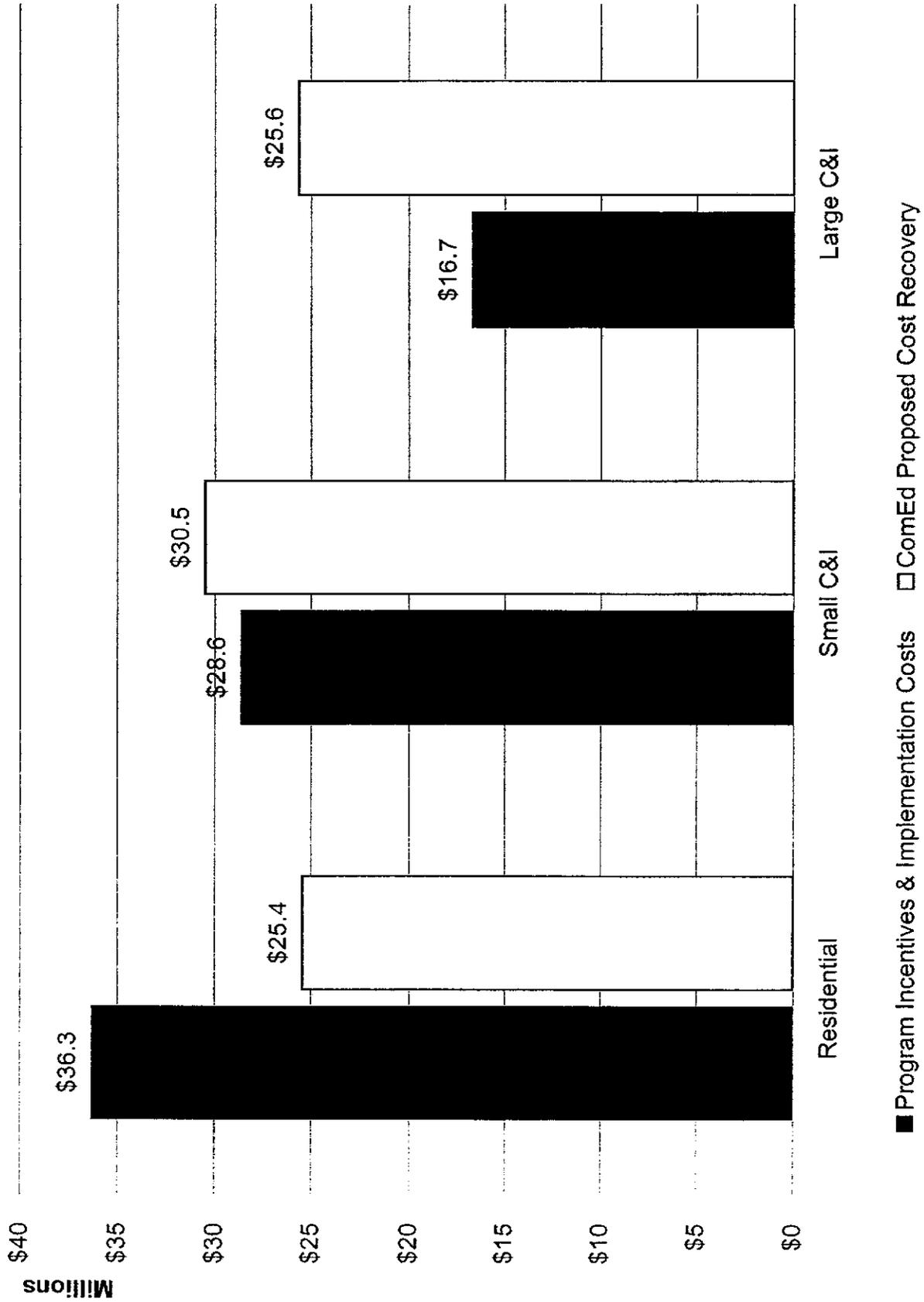
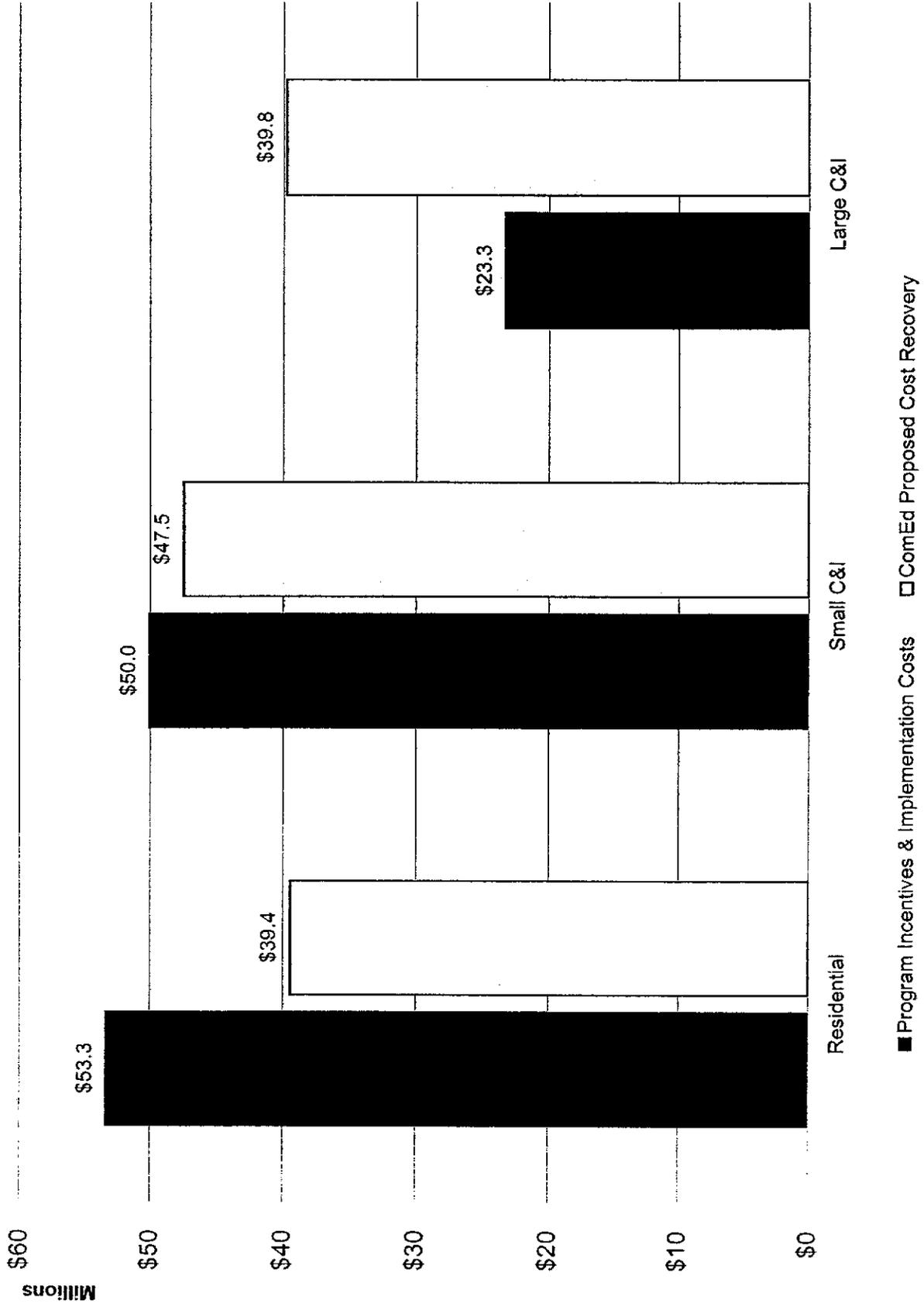


Figure 3: 2010 ComEd Proposed Program Costs and Recovery - by class



	A	B	C	D	E	F	G	H	I	J
			6/06 - 5/07			6/07 - 5/08			6/08 - 5/09	
	Distribution Delivery Class	Estimated Retail Revenues (\$1)	Estimated Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)	Projected Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)	Projected Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)
1										
2	Single Family Without Electric Space Heat	\$2,379,993,804	21,810,757	10,912	\$2,444,392,787	22,246,021	10,988	\$2,487,124,420	22,294,636	11,066
3	Multi Family Without Electric Space Heat	\$451,321,514	4,411,745	10,230	\$535,464,810	4,496,507	11,935	\$532,495,052	4,488,264	11,944
4	Single Family With Electric Space Heat	\$97,411,812	843,795	8,804	\$92,375,803	819,973	7,607	\$97,616,112	827,805	8,168
5	Multi Family With Electric Space Heat	\$32,874,534	1,807,925	7,362	\$133,509,515	1,689,485	7,997	\$147,597,097	1,719,244	8,585
6	Residential Total	\$3,021,597,664	28,873,922	10,465	\$3,175,742,715	28,222,002	10,888	\$3,214,831,681	29,299,849	10,972
7	Wait-Hour	\$119,891,182	1,148,227	10,424	\$65,987,929	616,770	12,796	\$70,668,043	654,693	12,722
8	Small Load (0 to 100 kW)	\$1,017,911,862	11,325,232	8,988	\$1,101,067,538	11,802,632	9,329	\$1,120,606,533	11,795,025	9,533
9	Medium Load (100 kW to 400 kW)	\$828,716,018	10,523,378	7,875	\$920,382,524	11,146,694	8,267	\$991,199,424	11,267,471	8,797
10	Large Load (400 kW to 1 MW)	\$772,249,460	9,979,962	7,798	\$792,308,523	10,354,539	7,362	\$876,681,268	10,590,616	8,274
11	Non-Res < 1MW Total	\$2,739,568,512	32,876,799	8,305	\$2,849,756,515	30,318,133	8,426	\$3,059,055,269	34,172,803	8,952
12	Very Large Load (1 MW to 10 MW)	\$1,373,635,688	19,705,002	6,971	\$1,442,804,564	19,695,667	7,326	\$1,628,139,443	19,933,065	8,158
13	Extra Large Load (> 10 MW)	\$409,808,176	7,053,497	5,810	\$290,190,692	4,356,617	6,669	\$327,243,818	4,380,774	7,470
14	Railroad	\$31,867,628	518,965	6,160	\$36,973,404	522,291	6,889	\$41,116,754	530,060	7,617
15	High Voltage	\$88,767,936	1,231,044	5,128	\$281,322,022	4,820,893	5,837	\$308,690,992	4,873,023	6,563
16	Non-Res > 1MW Total	\$1,904,179,429	28,008,499	6,864	\$2,050,422,692	29,395,408	6,975	\$2,301,190,514	29,616,922	7,988
17	Picture-Included Lighting	\$28,481,159	143,463	19,954	\$28,831,124	138,732	21,159	\$29,392,698	137,394	21,393
18	Dark to Dawn Lighting	\$24,965,523	541,082	4,614	\$26,342,824	439,025	6,014	\$33,688,859	536,108	6,249
19	General Lighting	\$2,928,918	39,859	7,397	\$10,160,366	161,692	9,702	\$5,503,527	71,428	7,708
20	Lighting Total	\$56,375,601	724,104	7,765	\$65,434,314	726,359	8,009	\$69,585,094	747,930	8,170
21	Total for all Retail Customers	\$7,720,719,208	91,583,023	8,430	\$8,141,566,226	93,163,504	8,739	\$8,643,662,547	93,737,606	9,221
22										
23										
24										
25										
26										
27										
28										
29										
30	Source: ICC Docket 07-0540: ComEd Ex. 6.1									
31										
32										
33	Percentage of Total Energy									
34	Distribution Delivery Class	Total Energy	% of Energy / Class	Total Energy	% of Energy / Class	Total Energy	% of Energy / Class	ComEd's Distribution of Program Costs	cents / kWh	Impact Over 2007 Revenues
35	Residential Total	28,873,922	31.527%	29,222,002	31.368%	29,299,849	31.257%	\$ 12,306,043	0.042	0.388%
36	Non-Res < 1MW Total	33,700,503	36.799%	34,548,094	37.081%	34,920,735	37.254%	\$ 14,850,785	0.042	0.503%
37	Non-Res > 1MW Total	29,008,499	31.876%	29,395,408	31.552%	29,516,922	31.489%	\$ 12,397,172	0.042	0.805%
38	Lighting Total									
39	Total for all Retail Customers	91,583,023	100.00%	93,163,504	100.00%	93,737,606	100.00%	\$ 39,370,000		
40										
41										
42	Distribution Delivery Class	Estimated Retail Revenues (\$1)	Estimated Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)	Projected Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)	Projected Energy Delivered (MWh)	Average Total Cost for Electric Service (\$/kWh)
43	Residential Total	39,136%	31,527%	10,465	39,008%	31,368%	10,868	37,193%	31,257%	10,972
44	Non-Res < 1MW Total	35.470%	36.098%	8,305	35.003%	35.391%	8,426	35.391%	36.456%	8,952
45	Non-Res > 1MW Total	24.893%	31.876%	6,594	25.185%	31.552%	6,975	26.823%	31.489%	7,798
46	Lighting Total	0.790%	0.791%	7,765	0.804%	0.780%	8,009	0.793%	0.788%	8,170
47	Total for all Retail Customers	100.00%	100.00%	8,430	100.00%	100.00%	8,739	100.00%	100.00%	8,221
48	Year	Residential Total	Non-Res < 1MW Total	Non-Res > 1MW Total	Lighting Total					
49	6/06-5/07	31.027%	36.798%	31.676%	0.000%					

	AJ
1	
	Average Total Cost for Electric Service (\$/kWh)
2	
3	11.068
4	11.944
5	8.168
6	8.685
7	10.972
8	
9	12.722
10	9.533
11	8.787
12	8.274
13	21.393
14	6.249
15	7.705
16	8.958
17	
18	6.158
19	7.470
20	7.757
21	6.563
22	7.786
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	A	B	C	D	E	F	G	H	I	J
50	8/07-53/08	31.365%	37.081%	31.562%	0.000%					
51	8/08-53/09	31.192%	37.374%	31.434%	0.000%					
52	8/09-53/10	31.192%	36.679%	31.434%	0.766%					
53	8/10-53/11	31.198%	36.671%	31.366%	0.795%					

Line	A	B	C		D	E	F	G		H
			606 - 507	607 - 508				607 - 508	607 - 508	
1										
2	Distribution Delivery Class	Estimated Retail Revenues (\$1)	Estimated Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)	Projected Energy Delivered (MWH)	Average Total Cost for Electric Service (\$/kWh)	Projected Retail Revenues (\$1)		
3	Residential Total	\$3,021,597,864	28,873,822	10,465	\$3,175,742,715	28,722,002	10,868	\$3,214,831,681		
4	Non-Res < 1MW Total	\$2,238,568,512	32,976,758	8,305	\$2,843,796,516	33,819,735	8,426	\$3,039,055,260		
5	Non-Res > 1MW Total	\$1,904,179,429	29,069,489	6,584	\$2,050,422,892	29,395,408	6,975	\$2,301,190,514		
6	Lighting Total	\$98,373,901	724,104	7,785	\$68,434,314	726,359	9,009	\$99,584,084		
7	Total for all Retail Customers	\$7,220,178,208	81,583,023	8,430	\$8,141,358,228	83,163,864	8,738	\$9,643,962,947		
9										
10	ComEd's Proposed Tariff >>>>	EDA =	PC - RIC - ARF + ORF							
11										
12										
13										
14										
15										
16	Residential Total		17,509,162				1,0072		29,298,949,000	
17			34,798,829				1,0072		29,585,018,077	
18			51,598,608			128,066	1,0072		29,877,644,676	
19	Small C&I		15,788,918				1,0072		34,172,805,000	
20			29,819,519				1,0072		34,705,865,810	
21			51,635,120			100,216	1,0072		35,166,788,841	
22	Large C&I		6,073,921				1,0072		29,816,922,000	
23			16,931,652			43,732	1,0072		29,824,543,075	
24			23,446,272			77,861	1,0072		30,125,338,201	
25										
26	Program Description	Small C&I	Large C&I							
27		80%	10%							
28	C&I Prescriptive	0%	100%	2008						
29	C&I Custom	100%	0%	2009						
30	Small C&I CFL Intro Rtl	90%	10%	2010						
31	C&I Retrocommissioning	100%	0%	2009						
32	C&I New Construction	100%	0%	2010						
33	General C&I Program Cost Allocation	68%	32%							
34										
35	Program Cost Allocation	Date	Alloc. Factors							
36	Residential	2008	45.560%							
37		2009	43.471%							
38		2010	41.313%							
39	Non-Res < 1MW	2008	39.397%							
40		2009	35.997%							
41		2010	40.374%							
42	Non-Res > 1MW	2008	15.043%							
43		2009	20.532%							
44		2010	16.313%							
45										
46	C&I Split	0.68	0.32							
47	C&I and Rest above line as values	0.68	0.32							
48										
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53	Energy Allocation Factors	Date	Energy Alloc.	PC Alloc.	PC Alloc. Calc	Initial Calc.				
54	Residential	2008	31.771%	45.560%	44.473%	0.000%				
55		2009	31.613%	43.471%	42.877%	0.000%				
56		2010	31.609%	41.313%	40.731%	0.000%				
57	Non-Res < 1MW	2008	36.298%	39.397%	40.059%	0.000%				
58		2009	36.687%	35.997%	36.566%	0.000%				
59		2010	36.749%	40.374%	40.780%	0.000%				
60	Non-Res > 1MW	2008	31.927%	15.043%	15.428%	0.000%				
61		2009	31.800%	20.532%	20.762%	0.000%				

The Allocation factors to left are used as described here. The first step is to place a 'Y' in column multiplied by D. Thus, the only program costs that are calculated are the non-joint costs. Once Alloc. Calc. determines the percentage of non-joint costs allocated to each class. The values column 'PC Alloc.', and pasted as values. Finally, place a number 2 into Cell C34 to allocate to

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Comment: David L Stowe:

EDA - Energy Efficiency and Demand Response Adjustment (cents/kWh) rounded to thousandths, applied to each kWh delivered.
PC - Projected Costs in \$
RIC - Reimbursements of Incremental Costs.
ARF - Automatic Reconciliation Factor (\$) = cumulative over or under collection resulting from the application of then applicable EDAs
ORF - Ordered Reconciliation Factor (\$) = amt orderd by the ICC to be refunded/collected.
UF - Uncollectible Factor = 1.0072 based on Rider UF if/when approved by the ICC for customers on rate BES-H
PE - Projected Energy (kWh) = projection of power and energy

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Comment: David L Stowe:

Projected Costs in \$

Cell: D14

Comment: David L Stowe:

Reimbursements of Incremental Costs.

Cell: E14

Comment: David L Stowe:

Automatic Reconciliation Factor (\$) = cumulative over or under collection resulting from the application of then applicable EDAs

Cell: F14

Comment: David L Stowe:

Ordered Reconciliation Factor (\$) = amt orderd by the ICC to be refunded/collected.

Cell: G14

Comment: David L Stowe:

Uncollectible Factor = 1.0072 based on Rider UF if/when approved by the ICC for customers on rate BES-H

Cell: H14

Comment: David L Stowe:

Projected Energy (kWh) = projection of power and energy

Cell: I14

Comment: David L Stowe:

Energy Efficiency and Demand Response Adjustment (cents/kWh) rounded to thousandths, applied to each kWh delivered.

Cell: C16

Comment: David L Stowe:

Program Costs are calculated from the next tab. All programs costs for Residential programs are allocated to Residential totals. Programs for Commercial and Industrial customers are split between the <1MW and >1MW classes as shown in the yellow box below. These percentages are assumed and may be changed. To do so, enter the percentage of participation for the < 1 MW class only, the > 1MW class will adjust automatically.

Finally, program costs for programs which apply equally to all classes of customers are allocated based on the energy allocation factors shown in the multi colored box below.

Figure 1: 2008 ComEd Proposed Program Cost Recovery - by class

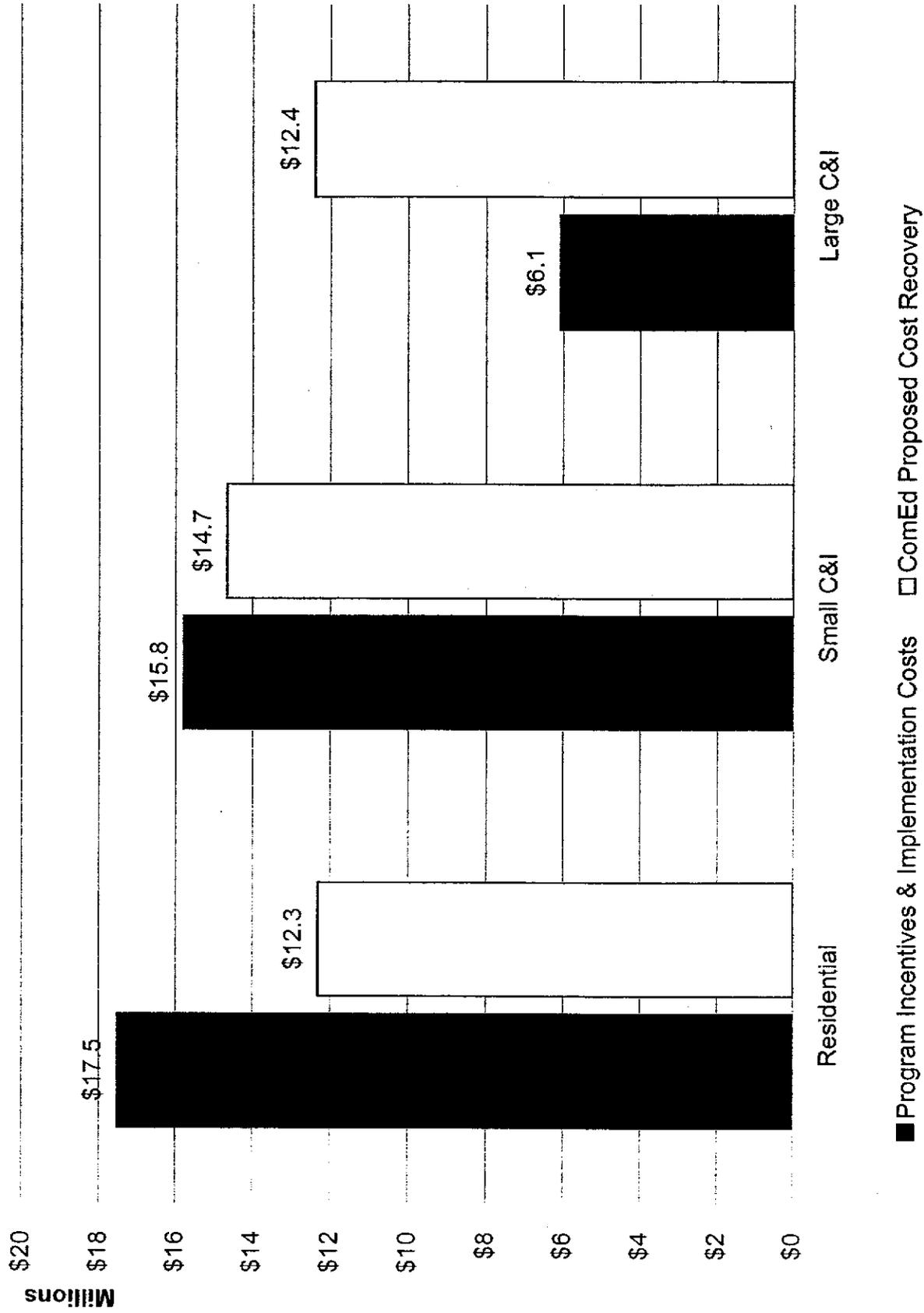


Figure 2: 2009 ComEd Proposed Program Costs and Recovery - by class

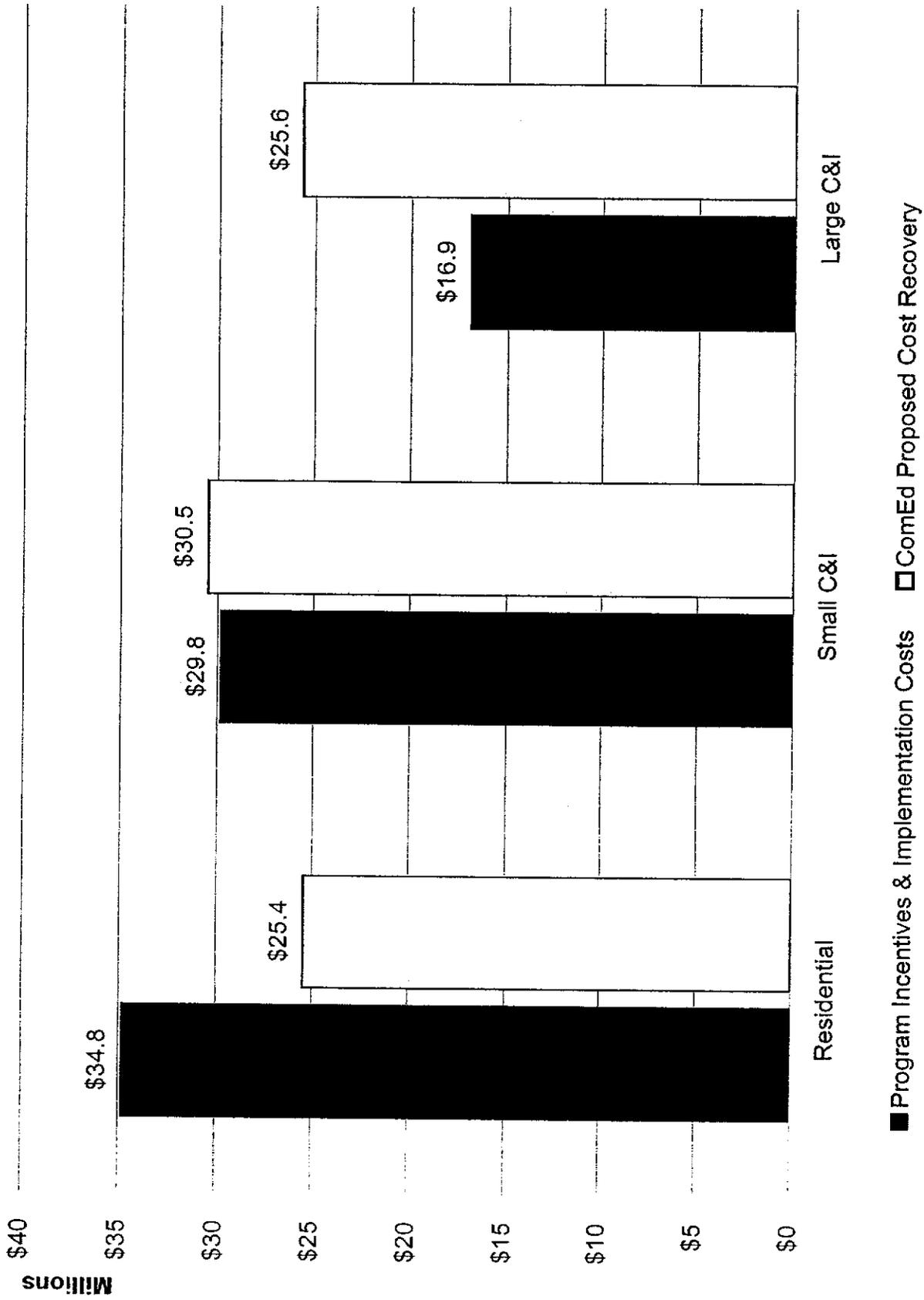


Figure 3: 2010 ComEd Proposed Program Costs and Recovery - by class

