

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.01:**

In relation to the Planning Process in Section 1.4 at p. 20 of the Plan please describe ComEd's program management and internal procedures, including the following:

- a) Descriptions of the different departments at ComEd involved in the process and the roles the departments played;
- b) Will the departments named in response to part a) have an ongoing role in managing the programs? If yes, please explain
- c) Please provide names and descriptions of the employees and contract employees involved in program planning, including department, position/title and background of the employees related to energy efficiency.
- d) Please provide names and descriptions of the employees and contract employees involved in program management and implementation, including department, position/title and background of the employees related to energy efficiency.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

- a) The following internal ComEd departments participated in the preparation of ComEd's Energy Efficiency and Demand Response Plan ("Plan"):
  - DSM & Energy Efficiency Program Planning -- managed the overall project
  - Energy Efficiency Services -- provided energy efficiency expertise and analytical support
  - Dynamic Pricing & Demand Response -- provided demand response expertise and analytical support
  - Marketing -- provided marketing support and analytics and also energy efficiency analytical support
  - Retail Rates -- provided analysis on the spending screens and developed the cost-recovery rider

OFFICIAL FILE  
 ICC DOCKET NO. 07-0540  
 299C 1.0  
 1/4/08

- Regulatory & Government Affairs – provided regulatory support across the project, particularly on the cost-recovery mechanism
- Finance – provided analytical and financial support on the spending screen calculations
- Communications – provided communication support for the overall Plan
- External Affairs & Large Customer Service – provided marketing and communication support for large customers

b) Energy Efficiency Services will have responsibility for the management of all ComEd energy efficiency programs, and Dynamic Pricing & Demand Response will have responsibility for the management of ComEd's demand response program. Other departments may have supporting roles to the extent required by the final program designs.

c) In addition to those individuals who have submitted testimony in support of ComEd's Plan (whose tasks and backgrounds are articulated in that testimony), other individual ComEd employees who participated in the planning process and their roles are detailed in ComEd's Response to Request No. ED 1.02.

d) Because ComEd's Plan has not yet been approved, actual program management has not yet begun. ComEd's planning process is ongoing, however, and a critical piece of that process is putting the program management team in place. Indeed, ComEd is currently building a team with the necessary experience to implement these programs.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.02:**

Please indicate how ComEd plans to integrate its customer service representatives into the Energy Efficiency Plan, including how it plans to train these individuals.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

The actual integration of the customer service representatives and level of training for those individuals will not be determined until the detailed program designs are completed. In the meantime, internal team meetings concerning final program designs already are underway within ComEd. These meetings include Customer Care, ComEd's customer service organization, to ensure that it is aware of and understands the various programs that are part of ComEd's Energy Efficiency and Demand Response Plan ("Plan") and can appropriately answer customer inquiries. Moreover, the ComEd CARE website ([www.comedcare.com](http://www.comedcare.com)) already contains information about the programs offered in ComEd's Plan, and ComEd also has prepared a one-page "leave behind" informational sheet for the Large Customer Services ("LCS") group. (See ComEd's Response to Request No. ELPC 1.02\_Attach 1.)

*Moving Illinois to the  
forefront of energy efficiency*

## Helping Commercial and Industrial Customers Reduce their Electricity Bills and Improve the Environment

ComEd filed a three-year plan with the Illinois Commerce Commission (ICC) on Nov. 15, 2007, outlining proposed energy efficiency programs that will help ComEd customers save more than \$155 million on their electricity bills over the life of the programs' measures.

These energy efficiency programs will reduce total ComEd customer electricity consumption by a cumulative amount of about 1.2 million megawatt-hours (MWh) by mid 2011. This would equal the amount of electricity needed to power about 140,000 homes for one year.

Energy efficiency reduces customers' bills and benefits the environment by reducing the amount of power needed from power plants that emit greenhouse gases linked to global climate change.

Pending ICC approval this coming February, the following program elements contained in the Business Solutions energy efficiency portfolio will launch in 2008:

### *Commercial and Industrial Prescriptive*

- **Planned for launch in June 2008.** This program would provide businesses with a menu of pre-approved measures, including environmentally friendly lighting, motors, HVAC equipment and chillers. Commercial and industrial customers would receive an incentive from ComEd for the implementation of these technologies.

### *Custom Incentives*

- **Planned for launch in September 2008.** Businesses would apply for an incentive on products that meet efficiency criteria. Applications would show an estimate of proposed savings and require a ComEd engineering review. Any measure that would improve a customer's electric energy efficiency could be eligible for incentives provided that it is cost-effective and not already part of the prescriptive program.

ComEd's proposed energy efficiency programs were developed after a national review of energy efficiency best practices and input received from a broad group of stakeholders. ComEd plans to recover the cost of these programs beginning in June 2008 with a small charge capped as a percentage of customers' previous year billing (0.5 percent in 2008, about 1.0 percent in 2009, and about 1.5 percent in 2010).

### Don't Wait to Start Becoming Energy Efficient!

Currently, ComEd offers a number of educational tools and programs to help customers use electricity more efficiently and lower their bills.

Take advantage of these existing programs today!

#### *Business Energy Analysis Tool*

- **Currently Available.** At [www.ComEdCARE.com](http://www.ComEdCARE.com), the ComEd Business Energy Analysis Tool helps customers understand how they use energy to run their business, and it provides tips to better manage usage.

#### *Energy Insights Online*

- **Currently Available.** Now you can monitor how much electricity you use and when you use it. Energy Insights Online uses your recording meter to convert your energy consumption data into simple, easy-to-understand usage graphs and makes it all available to you via the Internet. Pending ICC approval, Energy Insights Online will be provided at no charge to those customers who request it and who participate in ComEd's energy efficiency programs. This offering will not include any meter exchanges; and monthly meter charges will still apply.

#### *Smart Returns Load Response Program*

- **Currently Available.** ComEd Smart Returns is a "load response" program that pays business customers financial incentives for reducing their electricity usage during times when ComEd's distribution system is experiencing high levels of demand.

### Your Information Source

The business section of [www.ComEdCARE.com](http://www.ComEdCARE.com) has more information about these upcoming energy efficiency programs as well as current product offerings available from ComEd.

Check back often, as we will continue to post up-to-date information – including news regarding the 2008 energy efficiency programs pending ICC approval and programs slated for availability in 2009 and beyond.

Visit [www.ComEdCARE.com](http://www.ComEdCARE.com) today!

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43**

**Dated: December 6, 2007**

**REQUEST NO. ELPC 1.07:**

At p. 30 of the Plan the Company discusses the need to do public education related to energy efficiency, and the relationship between energy efficiency and environmental impact. Has the Company done any market research related to customer knowledge/awareness regarding energy efficiency and/or its relationship to the environment? If yes, please provide documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company*

*Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International. Going forward, ComEd recognizes the importance of data related to customer knowledge and awareness regarding energy efficiency and/or its relationship to the environment, and it intends to conduct market assessment and baseline research studies for future planning purposes.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.08:**

When does the company plan to firm up how it will do the EM&V for the programs in its Energy Efficiency and Demand Response Plan? Please explain.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request on the grounds that it mischaracterizes ComEd's Energy Efficiency and Demand Response Plan ("Plan") and incorporates an incorrect factual assumption. Without waiving these objections, ComEd states that it addressed EM&V in the "EM&V Requirements" section within each of the individual program element templates in the Plan. These sections detail how ComEd proposes that each program be evaluated. Once the EM&V contractor is retained, ComEd will review these proposed evaluation plans and modify them, if necessary, based on the evaluator's expert judgment, input from the collaborative process, and the evaluation dollars that are available to be allocated across the entire portfolio.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.09:**

In reference to the previous question, how and when does ComEd intend to conduct 1) process evaluation and 2) load impact evaluation in order to make mid-course corrections?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request on the grounds that it mischaracterizes ComEd's Energy Efficiency and Demand Response Plan ("Plan") and incorporates an incorrect factual assumption. Without waiving these objections, ComEd states that for each program, it will lay out with the evaluation contractor an evaluation plan, including a timeline, for all evaluation activities. ComEd intends to seek input from the collaborative process during program development. When specific actions (such as a process evaluation) will occur is dependent on both the nature of each program and the evaluation funds available. ComEd will balance the overall needs of its entire portfolio to determine the best course of action for each individual program. Any mid-course corrections would be made as required, and would be on a program-by-program basis.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.10:**

At p. 55 of the Plan the Residential HVAC program description notes that HVAC incentives will be paid to contractors, who may or may not pass them along to consumers in the form of lower fees. Please provide background and information on the decision to provide incentives to contractors without any agreement or guarantee that they will be passed on to consumers, including background and information comparing programs that provide incentives to HVAC contractors compared to incentives directly to consumer.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

Payment of incentives to contractors is a program approach that is sometimes used when the focus is on promoting market transformation while simultaneously achieving measure installations. The logic behind this approach is that if the contractor is allowed to retain some or all of the incentive, the contractor will be motivated, in turn, to improve sales presentations. In other words, the contractor will be motivated to incent a potential buyer using the energy savings features of the product, as opposed to simply a cash payment. This is precisely the behavior for which an energy efficiency program should strive, because it aims to gradually transform the market. ICF designed and successfully managed such a program for Pacific Gas & Electric in 2001, which won an award from the Association of Energy Service Professionals in 2002.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43**

**Dated: December 6, 2007**

**REQUEST NO. ELPC 1.11:**

At p. 42 of the Plan ComEd discusses its Residential lighting Marketing Strategy:

- a) In terms of direct consumer marketing the Company states that it will use bill stuffers and other direct mail approaches. Please discuss the effectiveness of bill stuffers compared to direct mail and provide all documents related to that analysis, including readership estimates for both.
- b) In regards to cooperative advertising please discuss the effectiveness of co-market advertising (e.g., circulars and flyers)

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states as follows.

(a) ComEd uses bill inserts in its monthly electric bills, as well as standalone direct mail campaigns, to communicate with its customers. During the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has not conducted any readership studies for its Plan. However, industry averages suggest a response rate of 0.07% for bill inserts, and 1.78% for standalone direct mail campaigns. These averages are presented in Chapter 19 of the Direct Marketing Association's report entitled "DMA 2007 Response Rate Trends Report," available for purchase at <http://imis.thedma.org/bookstore/ProductSingle.cfm?p=0D44027B14A5580B2896AA4CF323A6D812A17B35>. Due to copyright restrictions, ComEd could not attach the DMA report hereto.

(b) ComEd recently participated in a co-marketing arrangement with the expansion of the EnergyStar Change a Light, Change the World campaign directed to all ComEd residential customers in 2006. This program provided discounted CFLs through home improvement stores (Home Depot and Menards) and hardware chains (Ace, True Value, and Do It Best). ComEd's co-marketing arrangements during this CFL promotion relied on multiple vendors, and were

supported by multiple communications channels—critical keys to the program's success. (See ComEd's Response to Request No. ED 1.01\_Attach 66.) ComEd intends to consider these same strategies and tactics in the development of marketing activities for the energy efficiency programs described in its Plan.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.12:**

At p. 42 [of the Plan] in the marketing strategy section of the Residential Lighting program, the company discusses Mass-market advertising. In relation to this section please answer the following:

- a) Has ComEd done any surveys or focus groups to analyze customer knowledge or awareness regarding potential savings from energy efficient lighting and appliances? If yes, please describe and provide all documents. If no, please explain why not.
- b) Please describe ComEd's previous public education efforts on this issue, including date, spending and a description and breakdown of the different media outlets used. Also, provide copies of all communications and ads.
- c) Has ComEd discussed joint marketing campaigns with retailers? Please provide details.
- d) Has ComEd considered joint marketing campaigns with (1) manufacturers; (2) installers; (3) suppliers? Please provide details.
- e) Has the Company considered using PSAs either addressing general awareness or specific programs?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states as follows.

- (a) During the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International.

Going forward, ComEd recognizes the importance of data analyzing customer knowledge or awareness regarding potential savings from energy efficient lighting and appliances, and intends to conduct market assessment and baseline studies for future planning purposes.

(b) During the preparation of its Plan, ComEd did not conduct any public education efforts. However, information about ComEd's current residential CFL incentives is available at the ComEd CARE website ([www.comedcare.com](http://www.comedcare.com)). (See also ComEd's Response to Request No. ED 1.01\_Attach 66.)

(c) Because the programs in ComEd's Plan have not yet been approved for implementation, ComEd has not discussed program details with retailers. Joint marketing campaigns will be considered where appropriate.

(d) Program designs are not yet final, and joint marketing campaigns will be considered where appropriate.

(e) Program designs are not yet final, and PSAs will be considered where appropriate.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.13:**

How did ComEd determine the Residential Lighting incentive levels per unit on p. 43 [of the Plan]? Please provide all analysis and documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

The final Residential Lighting incentive levels were based on the judgment of ComEd and ICF staff. The report by the Midwest Energy Efficiency Alliance entitled "Change a Light, Change the World 2006 Campaign Summary Report, Results and Lessons Learned April 20, 2007" (see ComEd's Response to Request No. ED 1.01\_Attach 81) lists a per lamp buy-down (incentive) of \$2.00 for standard CFLs. Based on the very strong and positive market reaction to that program and considering the proposed design of the Residential Lighting program, ComEd and ICF lowered the assumed buy-down (incentive) for standard CFLs to \$1.50. These rebate levels are considered preliminary and subject to change during final program design.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.15:**

In reference to the previous question does the Company know how these costs compare to similar programs run by other utilities?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states that the budget estimates for the Residential Lighting program element in its Energy Efficiency and Demand Response Plan ("Plan") are based on the estimated percentages of incentive costs represented by administrative, marketing and implementation costs. These costs are roughly comparable, in relative terms, to the projections of program costs assumed by Connecticut Light and Power (CL&P) for its 2008 residential lighting and appliances program. These estimated costs were then adjusted to reflect what, in the judgment of ComEd and ICF, would be achievable given the proposed design of the program and ComEd's past experience with residential lighting programs, recognizing that actual costs will be determined based on the final structure of the program and the bids received for implementation.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.16:**

In reference to the Residential Lighting Savings Targets at p. 45 [of the Plan], has the Company considered what steps it can take to ensure the bulbs are used in high usage areas in order to ensure maximum savings?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

Yes. ComEd believes a strong marketing and educational component that addresses energy efficiency will be necessary for the energy efficiency portfolio to be successful. As part of this marketing and educational component, ComEd expects to address concepts such as how to maximize savings from CFLs.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.17:**

Has ComEd done any studies regarding current customer usage of CFLs, including how many households have one or more bulbs, how many CFLs the average home has, placement of the bulbs, why customers purchase the bulbs, etc.? Please provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International. Additionally, ComEd conducted a process and impact evaluation of the 2006 Change a Light, Change the World program, entitled "Process and Impact Evaluation Report for the Commonwealth Edison CARE Program (May 30, 2007)." (See ComEd's Response to Request No. ED 1.01\_Attach 66.)

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.18**

Has ComEd done any analysis regarding the lighting quality of CFLs on the market compared with traditional incandescent bulbs? Please provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis of lighting quality for its Plan. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.19**

Does ComEd believe there is any significant variance in quality between different CFL manufacturers, and if so how does it plan to address this issue?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states that it uses the EnergyStar certification as a requirement for inclusion of CFLs in the Residential Lighting program. ComEd believes that by requiring all participating CFL manufacturers to achieve the EnergyStar certification, it is addressing any potential variance-in-quality issue and ensuring that a certain threshold level of quality is achieved.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.20**

Does ComEd have any concerns regarding customer acceptance of the CFLs? Please provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that, based on its involvement over the past two years in the Change a Light, Change the World program, it does not have any concerns in general regarding customer acceptance of CFLs as it relates to ComEd's Energy Efficiency and Demand Response Plan ("Plan"). During each of the past two years, ComEd has promoted discounted CFLs over a very short time frame, yet still has distributed over one million bulbs each year during that abbreviated period. (See ComEd's Response to Request No. ED 1.01\_Attach 66.)

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.21**

Related to the Residential Lighting EM&V Requirements at p. 44 [of the Plan], please provide further discussion and detail regarding the difficulty of evaluating bulb placement and usage. Please provide more detail regarding how the company will be collecting customer information that will allow it to track participants' usage, including how it will obtain customer contact information.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states as follows. On page 44 of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd discusses the EM&V Requirements of the Residential Lighting program, and states specifically that "[e]valuations of market buy-down programs that do not collect participant contact information are challenging because of the difficulty in identifying where the bulbs are placed and how they are used." (ComEd Ex. 1.0, at 44.) This statement refers to stores that do not collect participant data, which makes it difficult for ComEd and the independent evaluator to know both who the participant is and how the bulb is used. However, as explained further on that same page, certain participating stores will require coupons to be completed by participants, so "the evaluator should have enough participant contact information to conduct the evaluation using participant-supplied bulb installation and measure use information gathered via a survey process." (*Id.*) "[P]articipants will be contacted to obtain the baseline bulb conditions (what type of bulbs were replaced and their locations) and the CFL use conditions needed to calculate energy savings." (*Id.*)

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.22**

In reference to the Appliance Recycling Program, please provide the basis for the Company's estimated participation rates for the Freezer, Refrigerator and Room AC programs, particularly the high participation in the Refrigerator program and low rates for the Room ACs. Please provide all related documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request on the grounds that it mischaracterizes ComEd's Energy Efficiency and Demand Response Plan ("Plan") and incorporates an incorrect factual assumption. Without waiving these objections, ComEd states as follows. The participation levels for each appliance in the Appliance Recycling program are based on calculations of two assumptions: (1) the number of eligible units per year and (2) a participation rate.

The assumed number of eligible units per year is based on the assumed saturation rate of the appliance. The assumed saturation rate for room air conditioners ("ACs") was approximately 4%, applied to a household base of about 2.2 million. This yields an eligible stock of room ACs in the range of 80,000 to 90,000 units. The saturation rate for second refrigerators, on the other hand, was assumed to be 25% of households, based on figures in the Midwest Energy Efficiency Alliance's March 2006 report entitled "Midwest Residential Market Assessment and DSM Potential Study." (See ComEd's Response to Request No. ED 1.01 Attach 13.) The higher number of projected refrigerators, relative to the number of room ACs, is a function of this difference in assumed saturation rate.

The participation rates assumed were 2%, 4.5% and 6% in 2008, 2009, and 2010. The same participation rate was applied to all three technologies within the Appliance Recycling program, and the rate was set primarily to yield a number for each appliance that ComEd was confident it could acquire. Because the assumed baseline number of room ACs was smaller than that for second refrigerators, the resulting number of estimated room ACs turned in was correspondingly lower. As with all of the programs in ComEd's Plan, these participation assumptions were used for initial planning purposes, and may be adjusted as ComEd gains program experience.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.23**

In relation to the Residential New HVAC Program, what analysis has the Company done regarding how customers purchase new units and how this relates to the effectiveness of mass marketing and direct consumer marketing? Please provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis for its Plan regarding how customers purchase new HVAC units and how this relates to the effectiveness of mass marketing and direct consumer marketing. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International. Given that the Residential New HVAC program is not anticipated to launch until 2009, ComEd may have the opportunity prior to launch to conduct this analysis and incorporate the results into the final program design.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.25**

If the Company did not implement the Nature First Program how many customers does it estimate would enroll next year? How many enrolled last year?

**RESPONSE:**

*Person responsible for response*

*James Eber, Commonwealth Edison Company*

ComEd objects to this request as vague and ambiguous. Without waiving this objection, ComEd states that "[i]f the Company did not implement the Nature First Program," then there would be no program in which customers could enroll. If ComEd implemented the Nature First program going forward as it did in 2007, then ComEd would expect similar results. Between January 1 and November 30, 2007, 7,645 customers enrolled in the program.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.27**

Did ComEd consider other options that fall between cycling off for 15 minutes every ½ hour and cycling off for a full 3 hours? Please discuss and provide all documents.

**RESPONSE:**

*Person responsible for response*

*James Eber, Commonwealth Edison Company*

ComEd objects to this request as overbroad, vague and ambiguous. Further, ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states as follows. Assuming that this request refers to ComEd's existing Nature First program, that program offers a customer a choice of one of two cycling options. The 50% option allows ComEd to cycle off the customer's air conditioning ("AC") unit 15 minutes every half-hour for no more than a six-hour period. The 100% option allows ComEd to cycle off the customer's AC unit for a maximum of one continuous three-hour period. (See Direct Testimony of James Eber, ComEd Ex. 3.0, lines 154-60.) During the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not create any specific document evaluating other potential Nature First cycling options.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.28**

Has ComEd done any research to estimate potential savings from consumers setting their thermostats at recommended levels in summer and winter?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis of data regarding potential savings from consumers setting their thermostats at recommended levels in summer and winter for its Plan. Going forward, ComEd recognizes the importance of data estimating potential savings from consumers setting their thermostats at recommended levels in summer and winter, and will consider conducting market assessment and baseline studies for future planning purposes.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.29**

Has ComEd considered doing any public education encouraging customers to take voluntary steps to reduce their energy use, such as adjusting their thermostat setting to recommended temperatures in summer and winter? Does ComEd plan to do any such education in the future?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that it has conducted public education encouraging customers to take voluntary steps regarding reducing energy use. ComEd has provided energy-saving tips for customers through numerous outlets, including press releases, over 100 customer outreach events in 2007, the ComEd CARE website ([www.comedcare.com](http://www.comedcare.com)), and the website promoting ComEd's Residential Real-Time Pricing ("RRTP") program ([www.thewattspot.com](http://www.thewattspot.com)). (See also ComEd's Response to Request No. ED 1.01\_Attach 66.) Going forward, ComEd plans to continue and expand this education element as part of its Energy Efficiency and Demand Response Plan ("Plan").

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.30**

Has ComEd done research regarding the usage of programmable thermostats in its service territory? If yes, please describe and provide all documentation, including the following:

- a) How many customers currently have programmable thermostats?
- b) How many customers who have programmable thermostats use them?
- c) The average savings per customer.
- d) The system benefits from usage of programmable thermostats.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis of data regarding usage of programmable thermostats for its Plan. Going forward, ComEd recognizes the importance of data regarding usage of programmable thermostats, and will consider conducting market assessment and baseline studies for future planning purposes.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.31**

Has ComEd done any analysis regarding customer's usage of outdoor lighting, including current customer usage of energy efficient outdoor lighting and potential customer savings? Please provide all documentation.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis of data regarding customers' usage of outdoor lighting for its Plan. Going forward, ComEd recognizes the importance of data regarding customers' usage of outdoor lighting, and will consider conducting market assessment and baseline studies for future planning purposes.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.32**

ComEd's Residential Lighting program description provides only minimal references to lighting designed for different uses. Has ComEd done any specific savings analysis or planned any specific programs related to:

- a) Outdoor lighting
- b) Recessed indoor lighting
- c) Candelabra-type lights
- d) Other forms of lighting

Please explain and provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the grounds that it mischaracterizes ComEd's Energy Efficiency and Demand Response Plan ("Plan"). Without waiving these objections, ComEd states that during the preparation of its Plan, it considered basic compact fluorescent screw-in and pin-based lamps, table lamps and torchieres for the Residential Lighting program element. Program designs are not yet final, however, and ComEd anticipates that the final design of the Residential Lighting program element may include specialty lamps. In addition, the Residential Advanced Lighting Package program element described in ComEd's Plan contemplates using a range of lighting fixtures. (See ComEd Ex. 1.0, at 64-67.)

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.33**

In regards to the Business Solutions programs did Com Ed consider programs related to:

- a) Municipal lighting
- b) Parking lot lighting
- c) Other forms of lighting

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as vague and ambiguous. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states as follows. As shown in Appendix B to ComEd's Energy Efficiency and Demand Response Plan ("Plan"), a number of exterior lighting measures were screened using the total resource cost ("TRC") test and passed. (ComEd Ex. 1.0, Appendix B.) Program designs are not yet final, however, and ComEd anticipates that the final design of the Prescriptive Incentives program element may include some exterior lighting options. In addition, as required by Section 12-103(e) of the Public Utilities Act, the Department of Commerce and Economic Opportunity ("DCEO") is responsible for implementing programs targeting municipal customers.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.34**

Please provide the most recent copy of ComEd's appliance saturation and/or customer end-use surveys, or any similar market research. Such research would include information such as the typical vintage and characteristics of the refrigerators and other appliances of ComEd customers.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no appliance saturation or customer end-use surveys, or any similar market research, for its Plan. Rather, ComEd relied on publicly available documents and the expertise of its demand-side management consultant, ICF International. (See, e.g., ComEd's Response to Request No. ED 1.01 Attach 13.) Going forward, ComEd recognizes the importance of this type of market research, and will consider conducting market assessment and baseline studies for future planning purposes.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.35**

What is the typical energy usage of a plasma television compared to an LCD television, and compared to the more traditional technology sets?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd has done no analysis of data regarding the energy usage of plasma televisions and LCD televisions as compared to televisions using other technologies. ComEd believes that measurement standards for digital televisions only were developed in 2007, and data is not yet available for this class of electronics.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.36**

Has ComEd done any studies or possess any information regarding phantom load, i.e load from appliance that are plugged in but not in use. Please provide all documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. ComEd also objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Without waiving these objections, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd has done no studies on phantom load (also referred to as "vampire" load). Information regarding phantom load is available, however, from the EnergyStar website ([www.energystar.gov](http://www.energystar.gov)), as well as in the following studies:

- David B. Floyd & Carrie Webber, *Leaving Electricity: Individual Field Measurement of Consumer Electronics*, available at <http://enduse.lbl.gov/info/ACEEE-Leaking.pdf>
- TIAX, LLC, *Energy Consumption by Consumer Electronics in U.S. Residences*, available at [http://www.ce.org/pdf/Energy%20Consumption%20by%20CE%20in%20U.S.%20Residences%20\(January%202007\).pdf](http://www.ce.org/pdf/Energy%20Consumption%20by%20CE%20in%20U.S.%20Residences%20(January%202007).pdf)

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.37**

In developing its strategy for the Prescriptive Incentives program did ComEd consider implementing different programs for different types of buildings (office, retail, age of building, strip mall, box store, etc.)? Please explain.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no studies regarding implementing different programs for different types of buildings for its Plan. The Business Solutions program within ComEd's Plan is an umbrella program that includes several program elements, including the Prescriptive Incentives program element. Program designs are not yet final, however, and ComEd anticipates that the final design of the Business Solutions program may include sub-programs or program elements targeting specific sectors (*i.e.*, health care, manufacturing, retail), as well as different types of buildings.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.38**

In reference to the Small C&I Intro Kit program, did the Company do any analysis regarding small business' current lighting fixtures and how the current fixtures would affect their participation in the program? Does ComEd have any concern that small businesses will be reluctant to switch only two bulbs, rather than all of the bulbs, given uniformity issues or concerns? This would apply particularly to retail outlets.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Without waiving this objection, ComEd states that during the preparation of its Energy Efficiency and Demand Response Plan ("Plan"), ComEd did not have the opportunity to conduct specific market research for its service territory due to the condensed planning timeframe. ComEd has done no analysis of data regarding the current lighting fixtures of small businesses for its Plan. As stated in the description of the Small C&I CFL Intro Kit program element in ComEd's Plan (ComEd Ex. 1.0, at 86-88), the intent of this program element is to reach out to a traditionally hard-to-reach market and stimulate interest in the other programs in ComEd's Plan intended for small C&I customers. ComEd also understands, however, that most small businesses have more than the two incandescent lighting fixtures covered by the Small C&I Intro Kit program element. It therefore anticipates offering additional incentives through the Prescriptive Incentives program element described in its Plan that could enable small C&I customers to retrofit all of their fixtures.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43**

**Dated: December 6, 2007**

**REQUEST NO. ELPC 1.39**

In reference to the Retrocommissioning program please explain the basis for the participation projections and provide all related documents.

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

The estimates of rates of participation in the C&I Retrocommissioning program element offered under ComEd's Energy Efficiency and Demand Response Plan ("Plan") were developed by ComEd and its demand-side management consultant, ICF International, based on professional judgment. These assumed participation rates were applied to estimated numbers of existing pieces of equipment that would be affected by the C&I Retrocommissioning program element. The program element was defined for modeling purposes as a variety of control and maintenance measures applied across all building types. All data used to develop the analysis of the proposed C&I Retrocommissioning program in the Plan was provided in ComEd's Response to Request No. ED 1.01.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.40**

Does ComEd have any concerns that it will be difficult to attract contractors to participate in the Retrocommissioning program?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

No. There are a number of contractors in the ComEd service territory that provide retrocommissioning services and that should be willing and able to participate in the C&I Retrocommissioning program element offered under ComEd's Energy Efficiency and Demand Response Plan ("Plan").

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.41**

In reference to the C&I New Construction program please provide the basis for ComEd's projections that only 7 building <sic> will participate in 2009 and 24 in 2010. How many buildings does ComEd project would be eligible to participate during these periods?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

These projections of participation in the C&I New Construction program element offered under ComEd's Energy Efficiency and Demand Response Plan ("Plan") were developed by ComEd and its demand-side management consultant, ICF International, based on professional judgment. The analysis estimated that approximately 300 buildings are constructed per year, all of which would be eligible to participate in the C&I New Construction program element. The assumed participation rates were 2.5% in 2009 and 8% in 2010, which resulted in the projections of 7 buildings in 2009 and 24 buildings in 2010.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.42**

Does the C&I New Construction program addresses gas savings opportunities? If yes explain. If no, is that simply a lost opportunity?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request on the basis that it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. ComEd also objects to this request on the grounds that it is argumentative. Without waiving these objections, ComEd states as follows. As explained in the Direct Testimony of Val Jensen, the Illinois version of the total resource cost ("TRC") test includes only the value of electricity savings and excludes natural gas savings. (ComEd Ex. 6.0, lines 335-65.) Because the measure-level TRC test for cost-effectiveness does not provide for inclusion of natural gas savings in the benefits, all measures in the C&I New Construction program element offered under ComEd's Energy Efficiency and Demand Response Plan ("Plan") were evaluated based on avoided electric costs only. While it is possible that natural gas savings may occur with certain measures, ComEd did not evaluate those benefits, as they were not relevant to the TRC test requirements.

ICC Docket No. 07-0540

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 1.01-1.43  
Dated: December 6, 2007**

**REQUEST NO. ELPC 1.43**

Generally speaking, how will third party contractors be incentivized to maximize energy savings?

**RESPONSE:**

*Persons responsible for response*

*Michael Brandt, Commonwealth Edison Company  
Val Jensen, ICF International*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states as follows. Assuming this request refers to third-party contractors hired to assist in implementing programs under ComEd's Energy Efficiency and Demand Response Plan ("Plan"), program designs are not yet final. However, ComEd anticipates providing an incentive to third-party contractors based on their ability to achieve milestone kilowatt-hour ("kWh") savings from measure installations while simultaneously achieving set cost goals.

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 2.01-2.15  
Dated: December 7, 2007**

**REQUEST NO. ELPC 2.13:**

Does ComEd intend to include a requirement that an annual audit and review be conducted on all activities subject to the third party implementer contracts? Please explain.

**RESPONSE:**

*Person responsible for response*

*Michael Brandt, Commonwealth Edison Company*

ComEd objects to this request as overbroad, vague and ambiguous. Further, to the extent that this request is interpreted to require additional information, ComEd objects on the grounds that it is unreasonable and unduly burdensome. Without waiving these objections, ComEd states that it expects generally that it will manage and review the activities of all third-party administrators. As explained in ComEd's Energy Efficiency and Demand Response Plan ("Plan") (ComEd Ex. 1.0), ComEd expects to conduct process evaluations for each program, which will evaluate the effectiveness of the programs and their processes. (*See also* ComEd's Response to Request No. ELPC 1.43.)

**ICC Docket No. 07-0540**

**Commonwealth Edison Company's Response to  
ELPC's (ELPC) Data Requests 2.01-2.15  
Dated: December 7, 2007**

**REQUEST NO. ELPC 2.15:**

Regarding ComEd's Exhibit 2.0, page 49 of 52 (lines 1105-1112), Witness Brandt explained that ComEd intends to collect its incremental costs associated with the planning and other aspects of the program. How will ComEd ensure that only legitimate, incremental costs incurred will be charged to these programs?

**RESPONSE:**

*Person responsible for response*

*Michael Brandt, Commonwealth Edison Company*

ComEd objects to this request as vague and ambiguous. Further, ComEd objects to this request on the grounds that it mischaracterizes Mr. Brandt's Direct Testimony (ComEd Ex. 2.0). Without waiving these objections, ComEd states that the Direct Testimony of Paul Crumrine generally describes how ComEd proposes to recover its incremental costs related to its Energy Efficiency and Demand Response Plan ("Plan") through proposed Rider EDA — Energy Efficiency and Demand Response Adjustment. (See ComEd Ex. 5.0, lines 126-262.) Moreover, ComEd currently is tracking incremental costs associated with the development of ComEd's Plan in its existing financial system. To ensure that ComEd has appropriate back office support when the programs launch, ComEd also intends to implement a cost-tracking system that is designed to capture and report on the costs associated with the programs in its Plan.