

November 13, 2007

Via U.S. First Class mail and Electronic Mail

Mr. Glenn Rippie
Attorney at Law
Foley & Lardner
321 North Clark Street, Ste.2800
Chicago, IL 60610-4764

**RE: ComEd -- Proposed General Increase in Electric Rates,
People of the State of Illinois' First Set of Data Requests**

Dear Mr. Rippie:

Enclosed please find the First Set of Data Requests from the People of the State of Illinois, by the office of the Attorney General ("AG"), numbered AG (DJE) 1 through AG (DJE) 40, directed to Commonwealth Edison Company ("ComEd"). We ask that the responses be provided as soon as possible but no later than December 4, 2007. If you become aware that you will not be able to provide a response by December 4, 2007 please notify counsel as soon as possible, and also indicate when the responses will be provided.

Please direct the responses to me, Erica Randall, Janice Dale, Kristin Munsch and Elias Mossos electronically at the following e-mail addresses: klusson@atg.state.il.us; jdale@atg.state.il.us; erandall@atg.state.il.us; kmunsch@atg.state.il.us; emossos@atg.state.il.us. If you have any questions regarding the data requests please do not hesitate to contact me.

Sincerely,

Karen L. Lusson
Senior Assistant Attorney General
Illinois Attorney General's Office
Public Utilities Bureau
100 W. Randolph Street, 11th Floor
Chicago, Illinois 60601
Telephone: (312) 814-1136
Fax: (312) 814-3212
klusson@atg.state.il.us

Enclosure

cc: Service List (by e-mail)

07-0566
ComEd Cross 3
Eldron
4-29-08 cc

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY)	
)	ICC Docket No. 07-
Proposed general increase in)	
electric rates)	

**People of the State of Illinois'
First Set of Data Requests to Commonwealth Edison Company**

Definitions

As used in this introduction, and in the information/data requests that follow, "you", "yours", refer to Petitioners, being Commonwealth Edison Company ("ComEd"), together with its affiliates, parent companies, directors, officers, employees, agents representatives, witnesses, and unless privileged, its attorneys.

As used in this introduction and in the information/data requests, "document" or "documents" means any written, recorded, filmed or graphic matter, whether produced, reproduced, or on paper, cards, tapes, film, electronic facsimile, computer storage device, or any other media, including but not limited to, memoranda, notes, analyses, minutes, records, photographs, correspondence, telegrams, diaries, bookkeeping entries, financial statements, tax returns, checks, check stubs, reports, studies, charts, graphs, statements, notebooks, handwritten notes, applications, contract agreements, books, pamphlets, periodicals, appointment calendars records and recordings of oral conversations, work papers, observations, commercial practice manuals, reports and summaries of interviews, reports of consultants, appraisals, forecasts, tape recordings, or any form of recordings that is capable of being transcribed into written form.

Instructions

In answering these information/data requests, furnish all information that is available to you, including information in the possession of your agents, employees, and representatives and all others from whom you may freely obtain it, and your attorneys and their investigators.

Each information/data request should be answered based on your knowledge, information or belief. Any answer that is based upon information or belief should state that it is given on that basis.

Please consider these requests for information ongoing throughout these proceedings. Updates to information already provided should be made as such information becomes available.

If any document requested is not in your possession or subject to your control, please explain why not, and give the present location and custodian of any copy or summary of the document.

When providing responses, please provide each response on a separate page, labeling each page at the top with the number of and text of the information/data request to which you are responding. **We ask that for each such response, the name of the Company's witnesses who is sponsoring the response be provided.** If, in responding to any discovery request, your answer contains a reference to a website, please state the precise location on the website of the discovery information requested, and instructions on how to access the precise page that contains the discovery information you reference.

Claim of Privilege

If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: data, senders, recipients of copies, subject matter of the document, and the basis upon which such privilege is claimed.

Response Time and Address

The People request that all responses be provided as soon as possible but no later than Tuesday, December 4, 2007. Please forward all responses directly to both the undersigned, Janice Dale, Kristin Munsch, Elias Mossos and Erica Randall. Again, those e-mail addresses are: klusson@atg.state.il.us; jdale@atg.state.il.us; erandall@atg.state.il.us; kmunsch@atg.state.il.us; emossos@atg.state.il.us. If you need any clarification, have any questions, or anticipate any delay in responding, please contact the undersigned at (312) 814-1136 or by e-mail at klusson@atg.state.il.us.

Very truly yours,

Karen L. Lusson
Senior Assistant Attorney General
Illinois Attorney General's Office
Public Utilities Bureau
100 West Randolph Street, 11th Floor
Chicago, Illinois 60601
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Fax: (312) 814-3212
Email: klusson@atg.state.il.us

ICC DOCKET NO. 07-

**People of the State of Illinois'
1st Set of Data Requests to
Commonwealth Edison Company
November 13, 2007**

- AG (DJE) 1. Please provide the actual gas plant in service by function as of March 31, 2007, June 30, 2007 and September 30, 2007.
- AG (DJE) 2. Please provide the actual accumulated depreciation and amortization by function as of March 31, 2007, June 30, 2007 and September 30, 2007.
- AG (DJE) 3. Please provide a comparison of actual to budgeted capital expenditures by function through September 30, 2007.
- AG (DJE) 4. Please provide the actual plant retirements and cost of removal by function for the period January 1, 2007 – September 30, 2007.
- AG (DJE) 5. Referring to Schedule B-2.2, please explain why the adjustment to pensions and benefits expense results in an adjustment to accumulated deferred income taxes.
- AG (DJE) 6. Referring to Schedule B-8.1, please explain the increase in materials and supplies from August 2006 to November 2006.
- AG (DJE) 7. Referring to Schedule B-8.1, please provide the same data from January 2007 until the latest month available.
- AG (DJE) 8. Referring to Schedule B-9, page 4, please explain why the adjustment on Line 4 related to severance costs is necessary.
- AG (DJE) 9. Please provide the actual balance in ICC Account 282, by detailed sub-account as on Schedule B-9 as of September 30, 2007.
- AG (DJE) 10. Referring to Schedule B-15, Page 1, why are none of the customer advances related to "Transmission and Distribution projects" treated as being jurisdictional?
- AG (DJE) 11. Referring to Schedule C-1, Page 1 please provide the distribution revenues based on 2006 weather normalized billing determinants and present rates. The response should provide supporting calculations.
- AG (DJE) 12. Referring to WPC-1a, Page 1, line 3, please provide reference to the specific authorization in Docket No. 05-0597 to establish a regulatory asset related to severance costs.

- AG (DJE) 13. Referring to WPC-1a, Page 1, lines 4-5, please provide reference to the specific authorization in Docket No. 05-0597 to establish a regulatory asset related to MGP remediation costs.
- AG (DJE) 14. Referring to WPC-1a, Page 1, line 11, please provide reference to the specific authorization in Docket No. 05-0597 to amortize Exelon Way severance costs for prospective recovery.
- AG (DJE) 15. Referring to WPC-1a, Page 1, line 11, please provide calculations supporting the annual amortization of Exelon Way severance costs.
- AG (DJE) 16. Referring to WPC-2.1, please provide assumptions and calculations supporting the 2007 salary and wage increase of \$7,462,187.
- AG (DJE) 17. Referring to WPC-2.2, page 1, please provide the distribution and total jurisdictional storm damage expense in the years 1998 – 2001.
- AG (DJE) 18. Referring to WPC-2.2, page 2, note (3) please provide the actual distribution storm damage expense in months subsequent to August.
- AG (DJE) 19. Referring to WPC-2.3, how did the Company identify the incremental merger costs?
- AG (DJE) 20. Referring to WPC-2.6, please provide the budgeted incentive compensation related to each achievement goal in 2005.
- AG (DJE) 21. Referring to WPC-2.8, please provide the actuarial studies supporting the 2007 ComEd benefits costs.
- AG (DJE) 22. Please provide the latest complete actuarial studies for benefits costs if different from the studies supporting the 2007 benefits costs.
- AG (DJE) 23. Referring to WPC-2.13, why are there no revenues shown for the items on Lines 1, 6-11, and 14?
- AG (DJE) 24. Referring to WPC-2.14, please provide the expenses incurred by month.
- AG (DJE) 25. Referring to WPC-2.16, page 1, please provide calculations supporting the customer growth rates for each customer class.
- AG (DJE) 26. Referring to WPC-2.16, did the Company include the additional customers and kWh sales in the pro forma billing determinants used to establish the proposed rates? If the response is affirmative please provide the relevant reference.
- AG (DJE) 27. Referring to WPC-2.17, how will the Company account for the \$1,690,000 that it

is proposing to include in its revenue requirement?

- AG (DJE)28. Please provide the actual ComEd accrual for pension costs and contributions to the pension funds in 2005, 2006, and 2007 to date.
- AG (DJE) 29. Referring to WPC-21, Line 4, please explain how the increase in the liability is determined.
- AG (DJE) 30. Referring to WPC-21, Line 6, please explain how the Illinois Energy Efficiency Program expense is determined.
- AG (DJE) 31. Referring to Schedule C-4, please explain the changes in expenses charged to the following accounts from 2005 to 2006: Accounts 593, 594, 598, 908, 920, 923, and 931.
- AG (DJE) 32. Referring to Schedule C-4, Page 4, please provide an analysis of Account 923 - Outside Services Employed for 2005 and 2006. The response should indicate the charges to Account 923 by sub-account and provide a description of the charges to the sub-accounts.
- AG (DJE) 33. Referring to Schedule C-11.3, please explain the increase in Medical Insurance Plan costs form 2005 to 2006.
- AG (DJE) 34. Referring to ComEd Ex. 7.4, please provide the same information on lines 1-5 for 2004.
- AG (DJE) 35. Referring to ComEd Ex. 7.4, please provide expenses on Lines 2 and 4 by FERC account for 2004 and 2006.
- AG (DJE) 36. For each month January 2007 until the most recent month available, please provide the number of full time and part-time ComEd employees, as on Schedule C-11.2a, Page 1.
- AG (DJE) 37. Referring to Schedule C-24, to what expense account are the additions to Account 228300 charged?
- AG (DJE) 38. Referring to Schedule C-24, please provide the actual cash disbursements charged against the Account 228.2 for each year 2004 – 2006 and 2007 to date.
- AG (DJE) 39. Please provide a copy of all responses to Staff data requests submitted to date and on an ongoing basis.
- AG (DJE) 40. Please provide on an ongoing basis copies of all responses submitted by the Company to data requests from all parties in this docket.

January 3, 2008

Via U.S. First Class Mail and Electronic Mail

Mr. Glenn Rippie Attorney at Law Foley & Lardner 321 North Clark Street, Ste. 2800 Chicago, IL
60610-4764

**RE: ComEd -- Proposed General Increase in Electric Rates
ICC Docket No. 07-0566
People of the State of Illinois' Fifth Set of Data Requests**

Dear Mr. Rippie:

Enclosed please find the Fifth Set of Data Requests from the People of the State of Illinois, by the office of the Attorney General ("AG"), numbered AG 5.1 (DJE) through AG 5.17 (DJE), directed to Commonwealth Edison Company ("ComEd"). We ask that the responses be provided as soon as possible but no later than January 17, 2008. If you become aware that you will not be able to provide a response by January 17, 2008 please notify counsel as soon as possible, and also indicate when the responses will be provided.

If you have any questions regarding the data requests please do not hesitate to contact me.

Sincerely,

Karen L. Lusson Senior Assistant Attorney
General Illinois Attorney General's Office
Public Utilities Bureau 100 W. Randolph
Street, 11th Floor Chicago, Illinois 60601
Telephone: (312) 814-1136 Fax: (312) 814-3212
klusson@atg.state.il.us

Enclosure

cc: Service List (by e-mail)

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY)	
)	ICC Docket No. 07-0566
Proposed general increase in)	
electric rates)	

**People of the State of Illinois'
Fifth Set of Data Requests to Commonwealth Edison Company**

Definitions

As used in this introduction, and in the information/data requests that follow, "you", "yours", refer to Petitioners, being Commonwealth Edison Company ("ComEd"), together with its affiliates, parent companies, directors, officers, employees, agents representatives, witnesses, and unless privileged, its attorneys.

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Response Time and Address

The People request that all responses be provided as soon as possible but no later than Thursday, January 17, 2008. If you need any clarification, have any questions, or anticipate any delay in responding, please contact the undersigned at (312) 814-1136 or by e-mail at klusson@atg.state.il.us

Very truly yours,

Karen L. Lusson Senior Assistant Attorney General
Illinois Attorney General's Office Public Utilities
Bureau 100 West Randolph Street, 11th Floor Chicago,
Illinois 60601 Telephone: (312) 814-1136 Fax: (312)
814-3212 Email: klusson@atg.state.il.us

**People of the State of Illinois'
Fifth Set of Data Requests to
Commonwealth Edison Company
January 3, 2008**

AG 5.1 (DJE) Please update the responses to AG (DJE) 1.01, 1.02, 1.03, 1.04, 1.07, 1.09, and 1.18 through December 31, 2007, when data are available.

AG 5.2 (DJE) Referring to the response to AG (DJE) 1.10, what amount of the customer advances on Schedule B-15 is distribution related?

AG 5.3 (DJE) Referring to the response to AG (DJE) 1.13, please provide an exact citation to where the "Order provides the authorization to recover the previously incurred MGP remediation costs in Rider ECR."

AG 5.4 (DJE) Referring to the response to AG (DJE) 1.23, please provide the revenues by month in 2007 for each identified item.

AG 5.5 (DJE) Referring to the response to AG (DJE) 1.24, to what account (or accounts) were the expenditures charged?

AG 5.6 (DJE) Referring to the response to AG (DJE) 1.26, please provide reference to where in the design of proposed rates the additional customer bills and kWh sales are taken into account.

AG 5.7 (DJE) Referring to the response to AG (DJE) 1.27, when the regulatory asset is established, will the offsetting entry be an accrual to a liability account? If so, please provide details. If not, please describe the offsetting entry.

AG 5.8 (DJE) Referring to WPC-2.18, please explain why the Company bases the interest on the pension contribution on the original prepayment amount in 2005 rather than on the remaining prepaid balance as of December 31, 2006.

AG 5.9 (DJE) Referring to the response to AG 1.30 (DJE), please provide the latest invoice from the Illinois Department of Commerce.

AG 5.10 (DJE) Referring to Schedule C-4, please provide the expenses charged to each account 580 – 935 in 2007. If the information is not available for the whole year, please provide the expenses through the latest month available.

AG 5.11 (DJE) Referring to the response to AG (DJE) 1.31, please explain the changes in the allocation of costs between capital and expense (Account 594).

AG 5.12 (DJE) Referring to the response to AG (DJE) 1.31, please provide the CARE expenses charged to Account 908 in 2007.

AG 5.13 (DJE) Referring to the response to AG (DJE) 1.32, please provide a similar schedule

for 2007 (or through the latest month available in 2007 if data for the whole year are not yet available.)

AG 5.14 (DJE) Referring to the response to AG (DJE) 1.32, please explain the increases in the following Sub-Accounts from 2005 to 2006: 529060, 529260, 529550, 529710, and 529930.

AG 5.15 (DJE) Referring to the response to AG (DJE) 1.33, please provide the Medical Insurance Plan costs incurred in 2007 through the latest date available. The response should show both the total costs and the amounts charged to expense.

AG 5.16 (DJE) Referring to the response to AG (DJE) 1.35, please explain the reasons for the increase in ESBC billings to ComEd A&G accounts from 2004 to 2006.

AG 5.17 (DJE) Referring to the response to Staff Data Request DLH 3.01, Attachment 2, please explain why the total charges for "Tools for People / ITSLACOM" for Accounts 590 and 598 together increased from 2005 to 2006.

jurisdictional balances and should provide data that are comparable to 2006 data.

- AG 10.9 (DJE) Please provide the electric plant in service balances by function as of the latest date available. The response should show the total company and jurisdictional balances.
- AG 10.10 (DJE) Please provide the accumulated depreciation balances by function as of the latest date available. The response should show the total company and jurisdictional balances.
- AG 10.11 (DJE) Referring to ComEd Exhibit 25.0, page 16, lines 333 – 341, please quantify the effect of the asserted errors. The response should include all supporting workpapers, calculations, and documentation.
- AG 10.12 (DJE) Please provide the balance of customer advances for construction as of the end of each month from January 2007 until the most recent month available. The response should show the balances of customer advances by function.
- AG 10.13 (DJE) Referring to ComEd Exhibit 25.0, page 57, lines 1185-1188, please identify where in Docket No. 05-0597 ComEd proposed to recover the referenced costs by amortizing them over a 7.5 year period.
- AG 10.14 (DJE) Referring to the responses to AG Data Requests 1.26 and 5.06, please provide specific citation to where in the rate design schedules or rate design workpapers the additional kWh sales are taken into account in the design of proposed rates. The response should indicate how the pro forma billing determinants used in the design of rates reflect the additional kWh sales, not where the revenues are reflected in the calculation of the revenue deficiency.
- AG 10.15 (DJE) Please provide a schedule similar to WPC-2.16, page 1 for 2007. The information should be provided on a weather normalized basis.
- AG 10.16 (DJE) Please update the response to AG Data Request 1.09.
- AG 10.17 (DJE) Please update the response to AG Data Request 5.10.
- AG 10.18 (DJE) Please update the response to AG Data Request 5.13.