

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

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

**RESPONSE OF THE COMMERCIAL GROUP TO  
REACT's PETITION FOR REHEARING**

The Commercial Group hereby respectfully submits its response to REACT's Application for Rehearing filed on October 14 in the above docket ("Application") in order to clarify the record. Without addressing the numerous substantive errors in REACT's erroneous argument for increasing rates across the board, the Commercial Group notes that REACT has grossly distorted or misrepresented the record in its Application.

Kroger has already pointed out in Kroger's October 15 Response one gross distortion made by REACT in arguing in its Application to reject ECOSS so as to benefit REACT's members at the expense of tens of thousands of schools, churches, homeless shelters and smaller commercial and industrial customers of ComEd. REACT also represented in that argument that "even the Commercial Group suggested that the ECOSS should not be used to set rates for the over-10 MW customers," citing Commercial Group Reply Brief pages 1-2 as support for this statement. REACT Application, p.8. On pages 1 and 2 of the Commercial Group's Reply Brief, the Commercial Group first argued that the ComEd cost study was reliable enough for setting rates and that rates of the Medium, Large, and Very Large classes "are above cost in all of the cost studies in evidence," including the IIEC primary/secondary study. The Commercial Group next described in the remainder of that cited portion another instance of REACT grossly distorting the record (this time in REACT's initial brief). The Commercial Group concluded that section by correctly summarizing Mr. Baudino's actual testimony that detailed customer-specific

cost studies would be “extremely difficult, if not impossible” to perform and arguing that ComEd not performing the customer-specific cost studies REACT requested “does not render ComEd’s CCOS Study invalid.” Remarkably, REACT represents to the Commission that these arguments “suggest that the ECOSS should not be used to set rates for the over-10 MW customers.” This is not an accurate representation.

Respectfully submitted this 16th day of October, 2008.

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