

Exhibit A

ICC Docket 08-0418

**Commonwealth Edison Company's Response to
Staff's (TEE) Data Requests CE 1.01 - 1.09
Dated August 29, 2008**

REQUEST NO. STAFF (TEE) - CE 1.01:

Paragraph 10 of the Petition states: "Nicor Gas will be responsible for 51.73% and ComEd for 48.27% of all costs at sites that had been transferred to Nicor Gas pursuant to the 1954 General Conveyance". How did the Company arrive at the 51.73%/48.27% allocation ("Allocation") for the sites? Provide all supporting workpapers and assumptions made in reaching those allocation percentages.

RESPONSE:

The Allocation was the result of an arms-length negotiation between ComEd and Nicor. The negotiations leading to the Allocation were driven by two factors. The first factor was Nicor's position that, for the sites which were not transferred to it as part of its spin-off from ComEd in 1954 and which it never operated, its share of remediation costs should be zero. Although ComEd believed (and would assert in any arbitration) that the 1954 Assignment and Assumption Agreement (under which liabilities between ComEd and Nicor would be determined) provides a potential basis for the imposition of some greater share of these costs on Nicor, it also recognized that Nicor's position has substantial logical and intuitive appeal. Accordingly, ComEd accepted that position solely for the purposes of the Final Allocation Agreement.

The second factor was the parties' mutual desire not to reallocate between themselves costs already spent on remediation as of a fixed date during the negotiations, and allocated pursuant to the 50/50 sharing in the Interim Cooperative Agreement. Both parties believed that such reallocation would cause tremendous complexity as well as customer confusion, given that remediation costs began being incurred fifteen or more years ago, and are continuing at the present time.

Once these two factors had been agreed upon, the settlement allocations of 51.73% (for Nicor) and 48.27% (for ComEd) for the sites transferred to Nicor in 1954 were calculated. The workpapers supporting the settlement allocations are attached hereto as STAFF (TEE) - CE 1.01_Attach 1. To the extent that the workpapers are covered by an applicable privilege, their submission to Staff as part of this Data Request Response is not intended to be, and should not be construed as, a waiver of such privilege in whole or in part.

Information concerning the person(s) responsible for providing the information requested in the above Data Request question is provided below:

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Commonwealth Edison Company
Summary of Transferred and NON-Transferred Manufactured
Gas Plant Sites and the Estimated Benefit \ Cost Scenario

CONFIDENTIAL AND PRIVILEGED
 Attorney-Client Communication/Party Representative Work Product
 Self Critical Analysis/Self Evaluative Privilege

May 22, 2007

See Scenario Directive for Details

	PAST Expenditures Life-to-Date as of December 31, 2006 (A)	FUTURE COSTS 1/1/07 and After (from 2006 Study plus adjustments)	PROPOSED ComEd Share Percentage (see Scenario Directive on Page 3)	<u>BENEFIT</u> derived if the ComEd Share of PAST COSTS is changed to PROPOSED %	<u>BENEFIT</u> derived if the ComEd Share of FUTURE COSTS is changed to PROPOSED %
Sites TRANSFERRED to Nicor (with Current Share %)					
Aurora Hurds Island ~~~~~ 50%	4,770,652	5,017,606	48.269031	165,157	173,706
Belvidere ~~~~~ 50%	5,883,175	896,701	48.269038	203,671	31,043
Blue Island ~~~~~ 50 %	593,498	1,801,822	48.269076	20,546	62,376
Chicago Heights ~~~~~ 50%	256,721	665,925	48.269133	8,887	23,053
DeKalb ~~~~~ 50%	739,472	31,446	48.269035	25,600	1,089
Evanston ~~~~~ 50%	-	1,361,132	48.269000	-	47,122
Freeport ~~~~~ 50%	2,936,277	114,614	48.269033	101,652	3,968
Geneseo SV ~~~~~ 50%	652,109	18,878	48.269001	22,576	654
Joliet Station B ~~~~~ 50%	-	1,527,897	48.269000	-	52,896
Kankakee ~~~~~ 50%	2,830,141	6,500	48.269044	97,977	225
LaGrange ~~~~~ 50%	211,029	6,500	48.268958	7,306	225
Lincoln ~~~~~ 50%	-	1,554,713	48.269000	-	53,824
Lockport Alcan ~~~~~ 45%	711,262	2,041,538	48.269063	24,623	70,675
Lockport Alcan (B) ~~~~~ 100%	-	-	-	(21,722)	-
Lockport Canal ~~~~~ 50%	83,336	125,267	48.269055	2,885	4,337
Mendota Black Brothers ~ 50%	-	1,547,770	48.269000	-	53,584
Morris ~~~~~ 50%	712,749	545,361	48.269026	24,675	18,880
Morrison ~~~~~ 50%	202,973	341,220	48.268982	7,027	11,813
Ottawa School ~~~~~ 50%	2,734,538	102,293	48.269031	94,668	3,541
Pontiac ~~~~~ 50%	1,884,697	10,493	48.269032	65,247	363
Skokie ~~~~~ 50%	264,646	7,913,894	48.269008	9,162	273,978
Sterling NW Wire ~~~~~ 50%	-	1,654,686	48.269000	-	57,285
Streator ~~~~~ 50%	3,347,146	798,522	48.269033	115,876	27,644
Streator ~~~~~ 100%	700,000	-	48.269000	362,117	-
Total of sites transferred to Nicor (excludes Oak Park)	29,514,421	28,084,778		1,337,930	972,281
Oak Park ~~~~~ 50%	76,110,155	1,145,354	48.269037	2,634,878	39,651
Total of ALL sites transferred to Nicor	105,624,576	29,230,132	BENEFIT ==>	3,972,808	1,011,932

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CONFIDENTIAL AND PRIVILEGED
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Sites NOT transferred to Nicor (with Current Share %)	PAST Expenditures Life-to-Date as of December 31, 2006 (A)	FUTURE COSTS 1/1/07 and After (from 2006 Study plus adjustments)	PROPOSED ComEd Share Percentage (see Scenario Directive on Page 3)	ADDITIONAL COST derived if the ComEd Share of PAST COSTS is changed to PROPOSED %	ADDITIONAL COST derived if the ComEd Share of FUTURE COSTS is changed to PROPOSED %
Aurora Excelsior (C) ~~~~ 50%	-	1,304,664	100	-	1,304,664
Dixon Church ~~~~~~ 50%	132,152	770,496	100	132,152	770,496
Dixon River ~~~~~~ 50%	55,282	1,732,731	100	55,282	1,732,731
DuQuoin Lumber ~~~~~~ 50%	-	1,009,431	100	-	1,009,431
DuQuoin Walmart ~~~~~ 30%	411,109	3,900	100	411,109	3,900
DuQuoin Walmart ~~~~~ 100%	800,000	-	100	-	-
Elgin ~~~~~~ 50%	-	1,360,144	100	-	1,360,144
Geneseo FNB ~~~~~~ 50%	11,921	518,925	100	11,921	518,925
Joliet Bluff Street ~ 50%	1,030,717	2,065	100	1,029,822	2,065
Joliet Bluff Street ~ 100%	243,000	-	100	-	-
Kennilworth ~~~~~~ 50%	836,296	6,500	100	836,296	6,500
Mendota Railroad ~~~~~ 50%	-	843,744	100	-	843,744
Murphyboro Big Muddy ~ 50% \ 42.5%	313,495	1,016,797	100	313,495	1,016,797
Murphyboro CIPS ~~~~~ 50% \ 42.5%	272,394	3,042,009	100	272,394	3,042,009
Ottawa Jims ~~~~~~ 50%	553,405	57,128	100	553,405	57,128
Rockford Library ~~~~~ 50%	-	1,836,437	100	-	1,836,437
Rockford Commercial ~ 50%	356,932	4,745,938	100	356,932	4,745,938
Total of sites not transferred to Nicor	5,016,703	18,250,909	CHARGE ==>	3,972,808	18,250,909
Total of ALL Sites	110,641,279	47,481,041		-	17,238,977
ComEd's share (50%) of the "Common Program Costs" - (not site specific)	663,869			Net	Net CHARGE
ComEd's share of PAST COSTS (ALL Sites) "PLUS" Common Program Costs	111,305,148				

Scenario Directive - Based on a Dave Stahl request dated April 16, 2007 - Develop new percentages for Transferred sites due to the reconciliation process performed by ComEd and Nicor on the PAST costs as of December 31, 2006. ComEd will incur 100% of all costs on Non-transferred sites. Also, NO monies will pass hands for pre-January 1, 2007 expenditures.

NOTES:

(A) In April 2007, ComEd and Nicor reconciled the "Life-to-Date" PAST Costs as of December 31, 2006 - the amounts shown reflect the results of the reconciliation process.

(B) There was \$45,000 of past costs that Nicor had paid and had not requested a 50% reimbursement from ComEd. The \$21,722 CREDIT represents ComEd's portion of the \$45k.

(C) While this site is not currently in the Interim Agreement, ComEd and Nicor have discussed adding it (as a site not subject to final allocation limits).

General Notes - ComEd was granted an Environmental Cost Recovery Rider (Rider ECR) as part of the ICC's final order dated July 26, 2006. Rider ECR became effective on January 2, 2007.