

STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION

April 19, 2000

Commonwealth Edison Company	:	
	:	00-0259
Petition for expedited approval of	:	
implementation of a market-based	:	
alternative tariff, to become effective on	:	
or before May 1, 2000, pursuant to	:	
Article IX and Section 16-112 of the	:	
Public Utilities Act	:	

TO ALL PARTIES OF INTEREST:

Copies of the attached letter is being served on all parties of record to this proceeding pursuant to 83 Ill. Adm. Code 200.710.

Sincerely,

Donna M. Caton
Chief Clerk

SC
Hearing Examiner: Mr. Jones

cc: Mr. Larson - Engineering

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Illinois Retail Merchants Association



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TEL (217) 544-1003 FAX (217) 528-0616

April 12, 2000

Commissioner Mary Francis Squires
II Commerce Commission
527 East Capitol Ave.
Springfield, Illinois 62706

Dear Commissioner Squires:

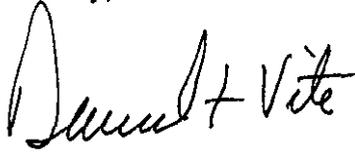
On behalf of the Illinois Retail Merchants Association (IRMA), I am writing in support of Commonwealth Edison Company's (ComEd) petition for expedited approval of a market-based alternative tariff, to become effective on or before May 1, 2000, pursuant to Article IX and Section 16-112 of the Public Utilities Act. IRMA represents nearly 23,000 stores statewide. Accordingly, IRMA has a substantial interest in the subject matter of this proceeding.

IRMA urges the Commission to adopt ComEd's proposed alternative methodology by May 1, 2000 so that customers can receive the full benefits associated with this methodology. IRMA believes that a market-based transition charge and power purchase option (PPO) is necessary for the advancement of competition in Illinois. The neutral fact finder (NFF) process has failed for several reasons. For instance, it does not adequately capture seasonal variation. Moreover, many RESs have been simply remarketing the PPO. IRMA believes that the implementation of ComEd's proposal will increase competition and result in more customer choice.

In addition, ComEd's proposal offers several reasonable options for customers currently taking service from the PPO-NFF tariff. ComEd has offered PPO-NFF customers the flexibility to stay on the PPO-NFF until its contract expires. ComEd has offered RESs two power sources to accommodate the need for firm supply for this upcoming summer: (1) a year long contract with its price mirroring that of the market values for Period A, and (2) a summer contract mirroring the PPO-NFF values. ComEd's proposal will also reduce CTCs because the market values will reflect summer seasonality, which will allow Retail Electric Suppliers (RES) to be able to competitively source power or turn to one of ComEd's sourcing options to attract and retain customers. Finally, because PPO prices should begin to reflect market prices, ComEd's proposal will allow RESs to be better positioned to compete with the PPO.

IRMA is concerned that if ComEd's petition is not approved by May 1, 2000, the choices it offers to customers and the immediate opportunity for improved competitive savings will be lost. IRMA believes that expeditious approval by May 1, 2000 will provide additional opportunities for savings to customers, enable customers and suppliers alike to efficiently plan for future service, and better reflect actual market values during the summer months. IRMA's aggregated program in the Edison service territory consists of nearly 400 MW of demand. If this tariff is not adopted by May 1, 2000, all of our participating members may be moved back to the PPO and away from the competitive market place.

Sincerely,

A handwritten signature in black ink that reads "David F. Vite". The signature is written in a cursive style with a large initial 'D'.

David F. Vite
President & CEO

cc: Mr. Larry Jones
Hearing Examiner