

REBUTTAL TESTIMONY

of

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Financial Analysis Division
Illinois Commerce Commission

Commonwealth Edison Company

Proposal to Establish Rider PORCB
(Purchase of Receivables with Consolidated Billing)

Docket No. 10-0138

August 4, 2010

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1 **Witness Identification**

2 **Q. Please state your name and business address.**

3 A. My name is Theresa Ebrey. My business address is 527 East Capitol Avenue,
4 Springfield, Illinois 62701.

5 **Q. Are you the same Theresa Ebrey who previously provided direct testimony**
6 **in this proceeding?**

7 A. Yes. I provided direct testimony in this case as ICC Staff Exhibit 3.0 on June 10,
8 2010.

9 **Q. What is the purpose of your rebuttal testimony?**

10 A. The purpose of my rebuttal testimony is to respond to the rebuttal testimony of
11 ComEd witnesses Robert Garcia (ComEd Ex. 3.0) and John Mittelbrun (ComEd
12 Ex. 4.0).

13 **Definitions**

14 Q. In your direct testimony you proposed tariff revisions reflecting definitions of the
15 costs to be recovered under Rider PORCB. What was the Company's
16 response?

17 A. In testimony filed on July 7, 2010, ComEd witness Garcia indicated that ComEd
18 would file a corrected Exhibit 3.5, on July 14 which would set forth its position on
19 tariff language. However, the Company did not provide its response until July 21,

20 when it filed Exhibit 3.5 Corr. Based on my abbreviated time for review of this
21 exhibit, the Company appears to agree to set forth definitions for the cost
22 components for POR and CB as I proposed. However, I cannot recommend the
23 Commission accept the changes the Company proposes to the specific language
24 of my definitions of costs to be recovered based on the limited testimony the
25 Company provided.

26 Q. Please explain.

27 A. The Company's changes would provide a less precise definition of the cost
28 components for POR and CB. The Company's changes would provide for:

- 29 1. Expansion of the specific costs to be recovered;¹
- 30 2. Inclusion the phrase "but not limited to";²
- 31 3. Provision to defer expenses from November 9, 2007 until the
32 effective date of the tariffs for cost recovery as development,
33 modification, and implementation costs³; and
- 34 4. Rejection of my time limitation on costs for development,
35 modification, and implementation.⁴

36 Q. Discuss your concern with the expansion of the specific costs to be recovered?

37 A. The Company's definitions for Administrative and Operational Costs ("AOCs")
38 and Billing Systems Administrative and Operational Costs ("BSAOCs") include
39 components labeled "operating and maintenance (O&M) activities,"
40 "implementation and operation of employee training and procedures," and

¹ ComEd Ex. 3.5 Corr., Original Sheets 393 and 394.

² *Id.*, Original Sheets 393 and 394.

³ *Id.*, Original Sheet 394.

⁴ ComEd Ex. 3.0, p. 17, lines 431 - 432.

41 “communication and educational activities,”⁵ which are in addition to the costs I
42 proposed in the definitions in my direct testimony.⁶ The Company does not
43 provide any testimony discussing why these additional components should be
44 included in the definition of recoverable costs. The definitions I proposed were
45 approved by the Commission and have been in operation for the Ameren Illinois
46 Utilities (“AIU”) since October of 2009. Therefore, I believe those definitions to
47 be reasonable for ComEd as well.

48 Q. Are you opposed to ComEd’s definition of recoverable costs differing from that
49 approved for the AIU pursuant to 220ILCS 5/16-118?

50 A. While I am not in total opposition to the definitions being different, I believe there
51 are strong arguments for consistent definitions across the utilities.

52 First, since the POR and CB programs for ComEd and Ameren are filed pursuant
53 to the exact same legislation, it does not seem reasonable that the definitions of
54 costs to be recovered under the individual utility tariffs should differ.

55 Second, the inconsistency of costs recoverable under similar tariffs for the
56 different utilities has resulted in contested issues in reconciliation cases where
57 some utilities were allowed to recover specific costs which were not allowed for
58 other utilities. In environmental riders for the recovery of coal tar remediation
59 costs, some utilities have been allowed recovery of land acquisition costs while

⁵ *Id.*

⁶ ICC Staff Ex. 3.0, pp. 4-5, lines 86 – 111.

60 others have not.⁷ This disparate treatment among the utilities could be avoided if
61 the definitions of recoverable costs were the same (or at least did not specifically
62 allow for recovery of differing costs) across the utilities.

63 Q. Discuss your concern with the phrase “but not limited to.”

64 A. This phrase leaves the door open for the recovery of any type of costs under the
65 PORCB Program. This exact issue was contested in the Ameren proceeding to
66 consider its UCB-POR Program; however, the final approved tariff language did
67 not include the phrase “but not limited to.” The Commission should not allow this
68 phrase to be included in the tariffs, since its effect would be to remove any
69 limitation of the costs to be recovered under the tariff provisions.

70 Q. Discuss your concern with the deferral of expenses as they relate to the
71 Developmental and Implementation Costs (“DICs”) and Billing Systems
72 Modification and Implementation Costs (“BSMICs”).

73 A. The deferral of expenses related to DICs and BSMICs was raised for the first
74 time in ComEd Ex. 3.5 Corr. on July 21. The Company has not provided
75 testimony explaining the need for the deferral of expenses or indeed what these
76 expenses even result from. The Company did not identify any deferred costs for
77 DICs or BSMICs in its FERC Form No. 1 for the year ending 2009. The

⁷ The environmental tariffs for Nicor and AmerenIP include provisions for recovery of land; the environmental tariffs of AmerenCIPS, AmerenCILCO, Commonwealth Edison, MidAmerican Energy Company, North Shore Gas Company, and Peoples Light and Coke Company do not allow for recovery of land acquisition costs.

78 Company also did not identify any such costs that it has deferred beginning in
79 November of 2007 in any of its responses to Staff's data requests until the
80 response to Staff data request TEE 2.01.⁸ It is unclear what expenses might be
81 deferred or why, if they provide benefits for the future PORCB Program, they are
82 not capitalized as part of the Program, rather than expensed.

83 Q. How has the Company described the types of costs to be recovered?

84 A. ComEd witness Garcia describes the categories of costs to be recovered as
85 costs associated with purchasing receivables (DICs and AOCs) and costs
86 associated with modifying the billing system (BSMICs and BSAOCs). From his
87 testimony, I understand the DICs and BSMICs to be capital investments and the
88 AOCs and BSAOCs to be operating and maintenance expenses.⁹ Nothing in
89 that discussion includes deferred expenses.

90 In the ComEd responses to Staff data requests TEE 1.02 and 1.04 the Company
91 includes a cost breakdown between "Capital" and "Project Labor (O&M)" but
92 since the DICs and BSMICs were previously described as capital investment, I
93 understand the "Project Labor (O&M)" to be capitalized internal labor costs, not
94 expenses currently being deferred.

95 Q. Has the Commission addressed deferral of costs related to Rider recovery
96 previously?

⁸ The referenced response was provided to Staff on August 3, 2010 at 5:49 PM. Thus, due to the schedule in this proceeding, Staff's opportunity for additional discovery related to these costs is severely limited to Staff's detriment.

⁹ ComEd Ex. 1.0, pp. 17 – 18, lines 409 – 437.

97 A. It is my understanding that the issue of deferred costs was considered in early
98 dockets considering recovery of environmental remediation (coal tar) costs. Only
99 costs for which deferral had been approved were allowed for recovery under the
100 coal tar riders. The utilities were required to request permission from the
101 Commission to defer expenses and that permission was only granted for costs
102 which began during the year in which deferral was requested. To my knowledge,
103 ComEd has not requested deferral of expenses related to DICs or BSMICs.

104 Q. Discuss your concern with the Company's rejection of your proposal to limit rider
105 recovery of DICs and BSMICs to those incurred on or before December 31,
106 2011.

107 A. The Company's rejection of my proposal leaves the timeframe for developmental
108 and implementation expenditures open ended. While these types of costs are
109 intended to be amortized over a ten (10) year period, the fact that there is no end
110 date to the incurrence of costs in effect makes this a rolling period. The
111 Company itself admits that any ten (10) year amortization period begins when the
112 investment is made.¹⁰

113 Q. Has the Company provided any testimony on the types of costs that might be
114 incurred after December 31, 2011?

¹⁰ ComEd Ex. 3.0, p. 19, lines 472 – 475.

115 A. ComEd witness Mittelbrun discusses potential costs that may be incurred after
116 December 31, 2011.¹¹ I disagree that the types of costs discussed would be
117 necessarily incremental costs specific to the combined PORCB Program.
118 Increases in RES activity might not directly impact transactions related to
119 purchase of receivables. The same can be said for changes in EDI standards or
120 testing of EDI with new RESs. Clearly, these are both circumstances that exist
121 totally separate from the PORCB program. They might not be incremental costs
122 specific PORCB. “Additional billing functionalities for other provisions of Senate
123 Bill 1299” might likewise not create incremental costs for the PORCB Program
124 but rather would be incremental costs of those other provisions. The Company is
125 simply trying to keep the universe of recoverable costs as broad as it possibly
126 can.

127 Q. Did the Company propose any changes to your proposed definitions of costs with
128 which you agree?

129 A. Yes. The Company made the following revisions which I accept:

- 130 1. Setting the effective date of the rider as the date for recovery of
131 costs incurred under AOC and BSAOC definitions;
- 132 2. Including “net actual uncollectible costs” in the definition of AOCs;
- 133 3. Stating the actual date Section 5/16-118 became effective; and
- 134 4. Reflecting separate definitions for each of the 4 components rather
135 than combining the definitions as I proposed.

¹¹ ComEd Exhibit 4.0, pp. 7 – 8, lines 134 – 179.

136 I have reflected those changes in my revised proposed definitions below.

137 **Administrative and Operational Costs (AOCs)**

138 AOCs are Incremental Costs incurred by or for the Company after
139 [effective date of this rider, 2010], associated with the purchase of RESs'
140 receivables for the electric power and energy supply service provided by
141 RESs to residential retail customers and other retail customers that
142 establish demands for electricity that are less than 400 kW. Such Costs
143 shall include ongoing Incremental Costs to operate and administer the
144 PORCB Program, specifically: (a) ongoing electronic data interchange
145 ("EDI") costs; (b) participation in regulatory proceedings associated with
146 the PORCB Program; (c) financial tracking, audit, and reconciliation
147 activities with respect to the PORCB Program; (d) staffing required to
148 address questions from RES and others regarding the PORCB Program,
149 and (e) net actual uncollectible costs. Such Incremental Costs are not
150 otherwise recovered under other effective tariffs.

151 **Billing System Administrative and Operational Costs (BSAOCs)**

152 BSAOCs are Incremental Costs incurred by or for the Company after
153 [effective date of this rider, 2010] associated with modifications of its billing
154 systems to enable the company to reflect on applicable retail customer
155 bills the charges associated with receivables for the electric power and
156 energy supply provided by RESs to residential retail customers and other
157 retail customers that establish demands for electricity that are less than
158 400 kW purchased by the Company from such RESs. Such Costs shall
159 include ongoing Incremental Costs to operate and administer the PORCB
160 Program, specifically: (a) participation in regulatory proceedings
161 associated with the PORCB Program; (b) financial tracking, audit, and
162 reconciliation activities with respect to the PORCB Program;; and (c)
163 staffing required to address questions from RES and others regarding the
164 PORCB Program. Such Incremental Costs are not otherwise recovered
165 under other effective tariffs.

166 **Billing Systems Modification and Implementation Costs (BSMICs)**

167 BSMICs are Incremental Costs incurred after November 9, 2007 through
168 December 31, 2011 by or for the Company associated with modification of
169 its billing systems to enable the Company to reflect on applicable retail
170 customer bills the charges associated with the receivables for the electric
171 power and energy supply service provided by RESs to residential retail
172 customers and other retail customers that establish demands for electricity
173 that are less than 400 kW purchased by the Company from such RESs.
174 Such Costs include: (a) initial programming changes to implement the
175 PORCB Program; (b) general billing system and related enhancements;

176 (c) development of a PORCB billing model; and (d) development of
177 information technology to implement the PORCB Program and customer
178 service representative training. BSMICs shall be amortized over a ten
179 (10) year period of time at a 6.71% carrying charge. Such incremental
180 costs are not otherwise recovered under other effective tariffs.

181 **Developmental and Implementation Costs (DICs)**

182 DICs are Incremental Costs incurred after November 9, 2007 through
183 December 31, 2011 by or for the Company associated with the purchase of
184 RESs' receivables for the electric power and energy supply service
185 provided by RESs to residential retail customers and other retail
186 customers that establish demands for electricity that are less than 400 kW.
187 Such Costs include: (a) initial programming changes to implement the
188 PORCB Program; (b) general billing system and related enhancements;
189 (c) development of applicable models to determine amounts owed to
190 RESs by the Company; and (d) development of information technology to
191 implement the PORCB Program and customer service representative
192 training. DICs shall be amortized over a ten (10) year period of time at a
193 6.71% carrying charge. Such incremental costs are not otherwise
194 recovered under other effective tariffs.

195 Q. You have reflected the component for net actual uncollectible costs in the AOC
196 definition above. Do you also accept the formula included on ComEd Ex. 3.5,
197 Original Sheet No. 399?

198 A. Yes, I agree that it is instructive to include the formula in the tariff as set forth by
199 the Company on the sheet referenced above. However, I also recommend that
200 the definition of "net actual uncollectible cost" be included in the tariff language
201 following the definition of "Legitimate Billing Dispute" as I proposed in direct
202 testimony. My proposal provides the specific precision needed in the cost
203 recovery tariff language.

204 **Zero POR and CB Adjustment**

205 Q. Does the Company agree with your proposal to reject the “zero” POR and CB
206 adjustment for the first 3 months of each billing period?

207 A. No. While I do not agree with the claim that setting the adjustment to zero for the
208 first three months of the billing period will result in increased accuracy in
209 reconciling costs and revenues, for the purposes of limiting contested issues, I
210 am withdrawing this proposal and the revisions associated therewith.

211 **Timing of Informational Filings**

212 Q. What is ComEd’s position regarding the timing of informational filings?

213 A. ComEd offers little argument regarding Staff’s proposal beyond the difficulty
214 meeting the 30-day filing window given the deadline for Commission order in this
215 case in December 2010 coupled with their plan for the first POR Application
216 Period to begin January 2011. In anticipation of the Commission Order, the level
217 of detail necessary for Staff to review the rates could certainly be provided to
218 Staff by December 1 in anticipation of the Order approving the tariffs. No rebuttal
219 to my testimony regarding the amount of information to be reviewed with each
220 filing was offered.

221 In addition, since I have withdrawn my previous proposal regarding the rate being
222 set to zero for the first three months of each application period, the initial CB and
223 POR Adjustments for each Application Period will be zero. The support for the

224 subsequent rates, which would be effective in April, could be provided by my
225 requested 30 day deadline.

226 I do note that the Company has agreed to mid-application period adjustments as
227 I proposed.¹²

228 **Interim Reporting Recommendations**

229 Q. Did the Company accept your proposal for interim reporting?

230 A. Yes, but with some revision. On Original Sheet No. 400, ComEd reflects a
231 provision for interim reporting, but only in each calendar year during which the
232 Company is not required to perform an internal audit of its costs for a POR
233 Application Period. I would be willing to accept that change provided the
234 Company would include the requested interim information in the required internal
235 audit report. I propose that the following language be added to the final
236 paragraph on Original Sheet No. 399:

237 For years in which an internal audit of costs is required, this
238 information may be included in the audit report provided to the
239 Manager of the Staff's Accounting Department, the Director of the
240 Staff's Financial Analysis Division, and the Director of the Staff's
241 Office of Retail Market Development.

242 In addition the Company extended the deadline for the interim report to 90
243 calendar days after the end of the year from my proposed 60 days. I will accept
244 the Company's 90 day proposal.

¹² ComEd Ex. 3.0, p. 22, lines 540 – 541.

245 **Accepted Recommendations**

246 Q. How did ComEd respond to your proposals regarding the tracking of costs and
247 revenues?

248 A. ComEd agreed to:

- 249 1. Establish unique accounts in its general ledger system to track
250 revenues associated with PORCB receivables;¹³ and
251 2. Maintain cost information in the level of detail proposed in my direct
252 testimony.¹⁴

253 Q. Did the Company likewise accept your proposals concerning the reconciliation
254 process?¹⁵

255 A. Yes. The changes I proposed were substantively reflected on ComEd Ex. 3.5
256 Corr. Original Sheet No. 400.

257 **Other Concerns Regarding Cost Estimates.**

258 Q. The Company, in its rebuttal testimony, indicates an increase in its estimated
259 costs from \$3,184,911 to \$4.5 million for costs related to purchase of receivables
260 and from \$12,596,214 to \$17.6 million related to billing system modifications.¹⁶
261 Do you have concerns about these cost estimates?

262 A. Yes. While I understand the purpose of this proceeding is to approve a recovery
263 mechanism for the costs related to the PORCB Program and not to approve a

¹³ ComEd Ex. 4.0, p. 4, lines 78 - 79.

¹⁴ Id., pp. 5-6, lines 106 - 114.

¹⁵ ICC Staff Exhibit 3.0, pp. 10 – 11, lines 220 – 284.

¹⁶ ComEd Ex. 4.0, p. 2, lines 39 – 40.

264 specific level of costs, there is some urgency in ComEd providing adequate
265 support and explanation for the costs associated with the billing system
266 modification.

267 Q. Please explain.

268 A. The costs related to purchase of receivables will not be reflected in rates charged
269 to ComEd customers until three months after the end of the initial application
270 period, currently projected to be April 2014. By that point in time, the actual costs
271 can be compared to amounts recovered through the discounted receivables
272 purchased from the RESs.

273 However, the billing system costs will be charged to ComEd customers beginning
274 with April 2011 bills as the CB Adjustment pursuant to Rider RCA. ComEd has
275 provided no third party documentation or even general budgeted information to
276 support these cost estimates. I am concerned with the increase in the estimated
277 costs by almost 40% based only on the inadequate explanation provided.

278 Q. What explanation did the Company provide?

279 A. In response to Staff data requests TEE 2.03 and 2.04 ComEd provided the
280 following explanation for the increased costs:

281 The change in the cost estimate is the result of a revised allocation
282 of the total costs related to the purchase of receivables, and is not
283 an identification of new project costs. This revised allocation
284 properly includes costs related to the development of Information

285 Technology infrastructure to facilitate the orderly switching of
286 customers and the expected increase in RES activity and electronic
287 data interchange transactions. This allocation was identified as
288 appropriate in the context of ComEd's preparation of its recent
289 general rate case filing.

290 The Commission might find that the costs identified "to facilitate the orderly
291 switching of customers and the expected increase in RES activity and electronic
292 data interchange transactions" are not "incremental costs" related to billing for
293 purchased receivables. Therefore they would not be recoverable costs under
294 Rider PORCB. While the "allocation was identified as appropriate in the context
295 of ComEd's preparation" of its rate case filing, Staff has not been provided the
296 opportunity to examine the basis for the allocation, nor has the Commission
297 made any finding as to the appropriateness of the allocations. Without the
298 opportunity for Staff or the Commission to perform even a perfunctory review of
299 these estimated costs prior to the effective date of the Rider, the ComEd
300 customers could potentially be charged a rate at least 40% higher than it should
301 be.

302 Q. What types of documentation has the Company provided to support the costs
303 incurred to day?

304 A. In response to Staff data request TEE 2.01, the Company provided a
305 spreadsheet listing costs incurred from January 2008 through May 2010.¹⁷
306 However, as indicated in testimony,¹⁸ ComEd has not categorized the costs into

¹⁷ Attachment A.

¹⁸ ComEd Ex. 4.0, p. 5, lines 100 – 105.

307 BSMICs (a component of the CB adjustment) and DICs (a component of the
308 POR adjustment). No invoices were provided in support of the costs listed.

309 In response to Staff data request TEE 2.02, the Company provided different
310 types of agreements related to its revised estimate of \$22.1 million. However, in
311 the text of the response, the Company acknowledges that the agreements cover
312 projects for both ComEd and PECO Energy Company.¹⁹ In addition, the
313 agreements cover projects and tasks other than PORCB. While the Company
314 has indicated that there are allocations involved in its cost estimates,²⁰ no
315 information has been provided to explain those allocations.

316 Q. Do you have a recommendation to resolve this concern?

317 A. Yes. The Company should provide workpapers including third-party invoices
318 supporting the costs included in the CB Adjustment (effective April 2011) no later
319 than February 1, 2011.

320 I also recommend that the Commission direct ComEd to evaluate the CB
321 Adjustment rate in effect for the first Application Period when they file the first
322 annual report as provided for in Rider PORCB, Original Sheet 399. Based on the
323 total costs included in that annual report, ComEd should confer with Staff to
324 determine if an interim revision to the CB adjustment rate is necessary.

¹⁹ Attachment B.

²⁰ Company responses to Staff data requests TEE 2.03 and 2.04.

325 **Conclusion**

326 **Q. What recommendations do you make?**

327 A. I recommend that:

328 1) The tariff language revisions proposed above and in my direct
329 testimony be approved;

330 2) The Commission order the Company to provide workpapers and third-
331 party invoices supporting both actual costs incurred as well as
332 estimated costs included in the calculation of the initial CB Adjustment
333 effective April 2011 no later than February 1, 2011; and

334 3) The Commission direct ComEd to evaluate the CB Adjustment rate in
335 effect for the first Application Period when they file the first annual
336 report as provided for in Rider PORCB, Original Sheet 399 and, after
337 conferring with Staff, to determine if an interim revision to the CB
338 adjustment rate is necessary .

339 **Q. Does this question end your prepared rebuttal testimony?**

340 A. Yes.

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
TEE 2.01 – 2.10
Dated: July 19, 2010**

REQUEST NO. TEE 2.01:

Referring to ComEd Ex. 4.0, pp. 506, lines 100 – 102 and lines 106 - 114, please provide support for the \$10.7 million total project spend as of May 31, 2010 in the level of detail indicated.

RESPONSE:

ComEd notes that by providing information in response to this data request it does not concede that this information is relevant to any issue in this docket. Without waiving this objection, ComEd states as follows. Please see TEE 2.01_Attach 1.

O&M

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Jan-08	Internal	\$ 87,698.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Feb-08	Internal	\$ 82,112.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Feb-08	Various	\$ 1,461.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Feb-08	Various	\$ 10.00	Project Management - Information Technology Expenditures	N/A	N/A
Mar-08	Internal	\$ (121,453.00)	Project Management - Labor (Fully Loaded)	N/A	N/A
Mar-08	Various	\$ 10.00	Project Management - Wireless Access	N/A	N/A
Mar-08	Various	\$ 945.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Apr-08	Internal	\$ 81,977.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Apr-08	Various	\$ 43.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
May-08	Internal	\$ 87,932.00	Project Management - Labor (Fully Loaded)	N/A	N/A
May-08	Various	\$ 876.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Jun-08	Internal	\$ (48,037.00)	Project Management - Labor (Fully Loaded)	N/A	N/A
Jun-08	Various	\$ 946.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Jun-08	Various	\$ 10.00	Project Management - Information Technology Expenditures	N/A	N/A
Jun-08	Various	\$ 3,548.00	Project Management - Program Management Expenditures	N/A	N/A
Jul-08	Internal	\$ 72,868.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Jul-08	Accenture	\$ 136,550.00	IT Services	708024200000	132957
Jul-08	Internal	\$ 28,365.73	IT Services	N/A	N/A
Jul-08	Mary W. Treisbach	\$ 24,792.00	ComEd Bill Format Focus Groups	2072508	1048579
Jul-08	Various	\$ 341.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Jul-08	Various	\$ 107,383.16	IT Services	Various	Various
Aug-08	Internal	\$ 72,535.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Aug-08	Accenture	\$ 86,012.50	IT Services	496534200000	132957
Aug-08	Various	\$ 361.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Aug-08	Various	\$ 10.00	Project Management - Office Expense	N/A	N/A
Aug-08	Various	\$ (2,650.00)	Project Management - Program Management Expenditures	N/A	N/A
Aug-08	Black & Veatch	\$ 1,312.18	IT Services	20144200000	1052492
Aug-08	Internal	\$ 55,933.44	IT Services	N/A	N/A
Aug-08	MISC	\$ 257.00	IT Services	Various	Various
Aug-08	SISG	\$ 2,745.00	IT Services	Various	1058100
Aug-08	Various	\$ 166,633.22	IT Services	Various	Various
Sep-08	Internal	\$ 127,672.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Sep-08	Accenture	\$ 102,062.50	IT Services	947054200000	132957
Sep-08	Various	\$ 19.00	Project Management - Materials and Supplies	N/A	N/A
Sep-08	Various	\$ 966.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Sep-08	Various	\$ 53.00	Office Expense	N/A	N/A
Sep-08	Black & Veatch	\$ 5,648.43	IT Services	808954200000	1052492
Sep-08	ework	\$ 89,039.55	IT Services	Various	Various
Sep-08	HTS	\$ 2,280.00	IT Services	Various	1058056
Sep-08	Internal	\$ 42,784.75	IT Services	N/A	N/A
Sep-08	MISC	\$ 53.00	IT Services	Various	Various
Sep-08	Practical Solutions INC	\$ 280.00	IT Services	Various	151375
Sep-08	SISG	\$ 71,320.00	IT Services	Various	1058100
Sep-08	Various	\$ (24,719.79)	IT Services	Various	Various
Oct-08	Internal	\$ 99,701.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Oct-08	Accenture	\$ 84,250.00	IT Services	609964200000	132957
Oct-08	ework	\$ 69,861.90	IT Services	Various	Various
Oct-08	100 SPEARS LLC DBA ework	\$ 3,575.00	Business Analyst	Various	1062418 release 210
Oct-08	Various	\$ 176.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Oct-08	Various	\$ 30.00	Office Expense	N/A	N/A

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Oct-08	HTS	\$ 1,330.00	IT Services	151347	1058056
Oct-08	Internal	\$ 16,030.05	IT Services	N/A	N/A
Oct-08	MISC	\$ 29.50	IT Services	Various	Various
Oct-08	Practical Solutions INC	\$ 709.13	IT Services	Various	151375
Oct-08	Various	\$ (65,385.85)	IT Services	Various	Various
Nov-08	Internal	\$ 107,572.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Nov-08	Accenture	\$ 51,000.00	IT Services	629484200000	132957
Nov-08	100 SPEARS LLC DBA EWORK	\$ 7,769.00	Business Analyst	Various	1062418 release 210
Nov-08	Various	\$ 1,519.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Nov-08	Various	\$ 186.00	Office Expense	N/A	N/A
Nov-08	Various	\$ 35.00	Project Management - Program Management Expenditures	N/A	N/A
Nov-08	EWORk	\$ 656.47	IT Services	Various	Various
Nov-08	Internal	\$ 21,253.73	IT Services	N/A	N/A
Nov-08	Various	\$ 11,480.00	IT Services	Various	Various
Nov-08	Ventyx	\$ 63,573.26	IT Services	157611	132954
Dec-08	Internal	\$ 60,861.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Dec-08	Accenture	\$ (14,000.00)	IT Services	202994200000	132957
Dec-08	Various	\$ 1,467.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Dec-08	Black & Veatch	\$ 540.00	IT Services	147305200000	1052492
Dec-08	Internal	\$ 2,141.93	IT Services	N/A	N/A
Dec-08	Various	\$ 17,390.00	IT Services	Various	Various
Dec-08	Ventyx	\$ 14,767.50	IT Services	159770	132954
Jan-09	Internal	\$ 48,634.00	Project Management - Labor (Fully Loaded)	N/A	N/A
Jan-09	Accenture	\$ 500.00	IT Services	840515200000	132957
Jan-09	Various	\$ 135.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Jan-09	Various	\$ 1,737.00	Project Management - Information Technology Expenditures	N/A	N/A
Jan-09	MISC	\$ (113.00)	IT Services	Various	Various
Jan-09	Ventyx	\$ 1,350.00	IT Services	162402	132954
Feb-09	Ventyx	\$ 2,460.00	IT Services	165443	132954
Feb-09	Various	\$ 2,460.00	Project Management - Information Technology Expenditures	N/A	N/A
Mar-09	Internal	\$ (12,593.00)	Project Management - Labor (Fully Loaded)	N/A	N/A
Mar-09	Internal	\$ 10,966.61	IT Services	N/A	N/A
Mar-09	Various	\$ 32,300.00	IT Services	Various	Various
Apr-09	Accenture	\$ 140,000.00	IT Services	553855200000	132957
Apr-09	EWORk	\$ 2,232.87	IT Services	Various	Various
Apr-09	Internal	\$ 15,761.26	IT Services	N/A	N/A
Apr-09	Various	\$ (28,520.00)	IT Services	Various	Various
4/6/09 - 4/12/09	100 SPEARS LLC DBA EWORK	\$ 3,388.18	Business Analyst	Various	1062418 release 238
4/13/09 - 4/19/09	100 SPEARS LLC DBA EWORK	\$ 3,359.09	Business Analyst	Various	1062418 release 238
4/20/09 - 4/26/09	100 SPEARS LLC DBA EWORK	\$ 3,049.36	Business Analyst	Various	1062418 release 238
4/27/09 - 5/1/09	100 SPEARS LLC DBA EWORK	\$ 3,165.72	Business Analyst	Various	1062418 release 238
May-09	Accenture	\$ 150,175.00	IT Services	285175200000	132957
May-09	Black & Veatch	\$ 4,860.00	IT Services	239375200000	1052492
May-09	EWORk	\$ 3,306.20	IT Services	Various	Various
May-09	IBM	\$ 1,015.00	IT Services	Various	1064035
May-09	Internal	\$ 19,162.12	IT Services	N/A	N/A
May-09	Various	\$ 14,140.00	IT Services	Various	Various
5/3/09 - 5/9/09	100 SPEARS LLC DBA EWORK	\$ 3,217.08	Business Analyst	Various	1062418 release 238
5/10/09 - 5/16/09	100 SPEARS LLC DBA EWORK	\$ 3,388.18	Business Analyst	Various	1062418 release 238
5/17/09 - 5/23/09	100 SPEARS LLC DBA EWORK	\$ 3,388.18	Business Analyst	Various	1062418 release 238
5/24/09 - 5/30/09	100 SPEARS LLC DBA EWORK	\$ 2,994.60	Business Analyst	Various	1062418 release 238

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Jun-09	Accenture	\$ 74,100.00	IT Services	642585200000	132957
Jun-09	Black & Veatch	\$ 9,112.50	IT Services	243885200000	1052492
Jun-09	ework	\$ 15,423.46	IT Services	Various	Various
Jun-09	IBM	\$ 10,911.00	IT Services	Various	1064035
Jun-09	Internal	\$ 31,753.26	IT Services	N/A	N/A
Jun-09	Various	\$ 9,290.65	IT Services	Various	Various
6/1/09 - 6/6/09	100 SPEARS LLC DBA ework	\$ 3,388.18	Business Analyst	Various	1062418 release 238
6/15/09 - 6/20/09	100 SPEARS LLC DBA ework	\$ 3,388.18	Business Analyst	Various	1062418 release 238
6/22/09 - 6/27/09	100 SPEARS LLC DBA ework	\$ 3,388.18	Business Analyst	Various	1062418 release 238
6/28/09 - 7/4/09	100 SPEARS LLC DBA ework	\$ 2,710.54	Business Analyst	Various	1062418 release 238
Jul-09	Accenture	\$ 30,487.50	IT Services	817795200000	132957
Jul-09	Black & Veatch	\$ 17,685.00	IT Services	675006200000	1052492
Jul-09	ework	\$ 10,293.31	IT Services	Various	Various
Jul-09	IBM	\$ 13,557.00	IT Services	Various	1064035
Jul-09	Internal	\$ 4,758.16	IT Services	N/A	N/A
Jul-09	Various	\$ (22,890.65)	IT Services	Various	Various
7/5/09 - 7/11/09	100 SPEARS LLC DBA ework	\$ 3,388.18	Business Analyst	Various	1062418 release 238
Aug-09	Accenture	\$ (30,100.00)	IT Services	716016200000	132957
Aug-09	Black & Veatch	\$ 4,320.00	IT Services	728516200000	1052492
Aug-09	IBM	\$ 188.50	IT Services	Various	1064035
Aug-09	Various	\$ (4,320.00)	IT Services	Various	Various
Sep-09	Various	\$ 1,313.00	Project Management - Travels Expenditures Related to UCBPOR	N/A	N/A
Oct-09	MISC	\$ 416.03	IT Services	Various	Various
Oct-09	Ventyx	\$ 19,000.00	IT Services	182236	132954
Nov-09	Ventyx	\$ 23,360.78	IT Services	183852	132954
Dec-09	Various	\$ (85,345.00)	IT Services	Various	Various
Total O&M		\$ 2,493,001.47			

Capital					
Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Jan-09 to Dec-09	Internal	\$ 72,843.87	Allowance for Funds Used During Construction	N/A	N/A
Jan-09 to Dec-09	Various	\$ 8,095.00	Project Management - Information Technology Expenditures	N/A	N/A
Jun-08	Internal	\$ 15,341.18	IT Services	N/A	N/A
Jun-08	Various	\$ 57,569.55	IT Services	Various	Various
Jul-08	MISC	\$ 193.51	IT Services	Various	Various
Jul-08	Various	\$ (70,106.80)	IT Services	Various	Various
Sep-08	Accenture	\$ 104,000.00	IT Services	947054200000	132957
Sep-08	Black & Veatch	\$ 3,442.50	IT Services	808954200000	1052492
Sep-08	ework	\$ 6,326.65	IT Services	Various	Various
Sep-08	Internal	\$ 20,991.09	IT Services	N/A	N/A
Sep-08	SISG	\$ 3,400.00	IT Services	Various	1058100
Sep-08	Various	\$ 6,604.64	IT Services	Various	Various
Oct-08	Accenture	\$ 17,250.00	IT Services	609964200000	132957
Oct-08	Black & Veatch	\$ 9,458.53	IT Services	37574200000	1052492
Oct-08	ework	\$ 76,269.95	IT Services	Various	Various
Oct-08	Internal	\$ 15,444.41	IT Services	N/A	N/A
Oct-08	Various	\$ 115,118.00	IT Services	Various	Various
Nov-08	Accenture	\$ 87,125.00	IT Services	629484200000	132957
Nov-08	Black & Veatch	\$ 22,950.00	IT Services	102694200000	1052492
Nov-08	ework	\$ 131,314.43	IT Services	Various	Various
Nov-08	Internal	\$ 3,745.50	IT Services	N/A	N/A

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Nov-08	MISC	\$ 1,155.48	IT Services	Various	Various
Nov-08	Various	\$ (89,040.00)	IT Services	Various	Various
Dec-08	Accenture	\$ (12,562.50)	IT Services	202994200000	132957
Dec-08	Black & Veatch	\$ 2,970.00	IT Services	147305200000	1052492
Dec-08	ework	\$ 17,652.35	IT Services	Various	Various
Dec-08	IBM	\$ 12,325.00	IT Services	116705200000	1064035
Dec-08	Internal	\$ 2,023.69	IT Services	N/A	N/A
Dec-08	Ventyx	\$ (71,435.00)	IT Services	159770	132954
Jan-09	Accenture	\$ 3,750.00	IT Services	840515200000	132957
Jan-09	Black & Veatch	\$ 1,213.29	IT Services	955625200000	1052492
Jan-09	IBM	\$ (2,537.50)	IT Services	Various	1064035
Jan-09	Various	\$ (1,375.00)	IT Services	Various	Various
Mar-09	IBM	\$ 29,289.50	IT Services	Various	1064035
Apr-09	MISC	\$ 27.00	IT Services	Various	Various
May-09	Internal	\$ 21,329.86	Project Management - Labor (Fully Loaded)	N/A	N/A
May-09	IBM	\$ 6,235.00	IT Services	Various	1064035
May-09	Internal	\$ 1,373.54	IT Services	N/A	N/A
Jun-09	Internal	\$ (22,246.87)	Project Management - Labor (Fully Loaded)	N/A	N/A
Jun-09	Internal	\$ (1,374.88)	IT Services	N/A	N/A
Jun-09	Various	\$ 24.00	Project Management - Business Travel Expenditures	N/A	N/A
Jun-09	MISC	\$ 669.13	IT Services	Various	Various
Jun-09	Various	\$ (29,289.50)	IT Services	Various	Various
Jul-09	Internal	\$ 37,178.34	Project Management - Labor (Fully Loaded)	N/A	N/A
Jul-09	Accenture	\$ 87,000.00	IT Services	817795200000	132957
Jul-09	100 SPEARS LLC DBA ework	\$ 9,452.67	Business Analyst	Various	1062418 release 238
Jul-09	Black & Veatch	\$ 1,080.00	IT Services	675006200000	1052492
Jul-09	ework	\$ 12,073.15	IT Services	Various	Various
Jul-09	Internal	\$ 16,311.94	IT Services	N/A	N/A
Jul-09	Various	\$ 6,615.00	IT Services	Various	Various
Aug-09	Internal	\$ 58,278.76	Project Management - Labor (Fully Loaded)	N/A	N/A
Aug-09	Accenture	\$ 196,237.50	IT Services	716016200000	132957
Aug-09	100 SPEARS LLC DBA ework	\$ 13,502.22	Business Analyst	Various	1062418 release 238
Aug-09	Various	\$ 42.00	Project Management - Business Travel Expenditures	N/A	N/A
Aug-09	Black & Veatch	\$ 28,417.50	IT Services	728516200000	1052492
Aug-09	ework	\$ 46,748.47	IT Services	Various	Various
Aug-09	IBM	\$ 6,597.50	IT Services	Various	1064035
Aug-09	Internal	\$ 25,202.06	IT Services	N/A	N/A
Aug-09	Various	\$ 9,110.00	IT Services	Various	Various
Sep-09	Internal	\$ 61,688.25	Project Management - Labor (Fully Loaded)	N/A	N/A
Sep-09	Accenture	\$ 124,175.00	IT Services	634426200000	132957
Sep-09	100 SPEARS LLC DBA ework	\$ 13,370.44	Business Analyst	Various	1062418 release 238
Sep-09	Black & Veatch	\$ 24,165.00	IT Services	254426200000	1052492
Sep-09	ework	\$ 68,277.81	IT Services	Various	Various
Sep-09	IBM	\$ 11,206.56	IT Services	Various	1064035
Sep-09	Internal	\$ 33,075.29	IT Services	N/A	N/A
Sep-09	Various	\$ 13,040.44	IT Services	Various	Various
Oct-09	Internal	\$ 119,720.10	Project Management - Labor (Fully Loaded)	N/A	N/A
Oct-09	Accenture	\$ 251,487.75	IT Services	387736200000	132957
Oct-09	100 SPEARS LLC DBA ework	\$ 13,633.14	Business Analyst	Various	1062418 release 238
Oct-09	Various	\$ (200.93)	Project Management - Material	N/A	N/A
Oct-09	Various	\$ 101.03	Project Management - Business Travel Expenditures	N/A	N/A

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Oct-09	ework	\$ 80,563.79	IT Services	Various	Various
Oct-09	IBM	\$ 11,014.44	IT Services	Various	1064035
Oct-09	Internal	\$ 39,019.79	IT Services	N/A	N/A
Oct-09	MISC	\$ 3,512.52	IT Services	Various	Various
Oct-09	Various	\$ 25,912.06	IT Services	Various	Various
Nov-09	Internal	\$ 75,397.70	Project Management - Labor (Fully Loaded)	N/A	N/A
Nov-09	Accenture	\$ 283,247.50	IT Services	851156200000	132957
Nov-09	100 SPEARS LLC DBA ework	\$ 15,396.07	Business Analyst	Various	Various
Nov-09	Various	\$ 28.00	Project Management - Business Travel Expenditures	N/A	N/A
Nov-09	Black & Veatch	\$ 49,747.50	IT Services	Various	1052492
Nov-09	ework	\$ 115,800.33	IT Services	Various	Various
Nov-09	GXS	\$ 962.58	IT Services	551456200000	1046765
Nov-09	IBM	\$ 14,026.00	IT Services	Various	1064035
Nov-09	Internal	\$ 54,745.85	IT Services	N/A	N/A
Nov-09	MISC	\$ 1,483.99	IT Services	Various	Various
Nov-09	Various	\$ (20,072.90)	IT Services	Various	Various
Dec-09	Internal	\$ 75,770.22	Project Management - Labor (Fully Loaded)	N/A	N/A
Dec-09	Accenture	\$ 309,835.00	IT Services	151666200000	132957
Dec-09	100 SPEARS LLC DBA ework	\$ 25,462.86	Business Analyst	Various	Various
Dec-09	Black & Veatch	\$ 14,850.00	IT Services	977576200000	1052492
Dec-09	ework	\$ 127,403.13	IT Services	Various	Various
Dec-09	IBM	\$ 21,097.50	IT Services	Various	1064035
Dec-09	Internal	\$ 48,767.74	IT Services	N/A	N/A
Dec-09	MISC	\$ 1,226.78	IT Services	Various	Various
Dec-09	Various	\$ 372,635.89	IT Services	Various	Various
Jan-10	Internal	\$ 55,546.32	Project Management - Labor (Fully Loaded)	N/A	N/A
Jan-10 to May-10	Internal	\$ 64,520.51	Allowance for Funds Used During Construction	N/A	N/A
Jan-10	Accenture	\$ 247,202.50	IT Services	73396200000	132957
Jan-10	100 SPEARS LLC DBA ework / E	\$ 38,502.94	Business Analysts - Various	Various	Various
Jan-10	Various	\$ 69.50	Project Management - Business Travel Expenditures	N/A	N/A
Jan-10	Beeline	\$ 33,622.54	IT Services	Various	1073957
Jan-10	Black & Veatch	\$ 16,200.00	IT Services	273396200000	1052492
Jan-10	ework	\$ 99,301.02	IT Services	Various	Various
Jan-10	IBM	\$ 11,455.00	IT Services	Various	1064035
Jan-10	Internal	\$ 54,833.35	IT Services	N/A	N/A
Jan-10	MISC	\$ 1,376.30	IT Services	Various	Various
Jan-10	Regulus	\$ 16,466.09	IT Services	Various	126549
Jan-10	Various	\$ (13,153.08)	IT Services	Various	Various
Feb-10	Internal	\$ 88,267.87	Project Management - Labor (Fully Loaded)	N/A	N/A
Feb-10	Accenture	\$ 322,493.75	IT Services	696596200000	132957
Feb-10	BEELINE	\$ 42,824.53	Business Analysts - Various	Various	1073957 release 83 / 1074476 release 1
Feb-10	Various	\$ 60.00	Project Management - Business Travel Expenditures	N/A	N/A
Feb-10	Beeline	\$ 167,839.18	IT Services	Various	1073957
Feb-10	Black & Veatch	\$ 26,527.50	IT Services	922307200000	1052492
Feb-10	ework	\$ 2,620.13	IT Services	Various	Various
Feb-10	IBM	\$ 15,152.50	IT Services	Various	1064035
Feb-10	Internal	\$ 51,236.07	IT Services	N/A	N/A
Feb-10	MISC	\$ 1,376.30	IT Services	Various	Various
Feb-10	Regulus	\$ 2,395.54	IT Services	Various	126549
Feb-10	Various	\$ (38,112.06)	IT Services	Various	Various

Date	Vendor	Dollar Amount	Description of Service Provided	Invoice	Contract
Mar-10	Internal	\$ 61,643.11	Project Management - Labor (Fully Loaded)	N/A	N/A
Mar-10	Accenture	\$ 554,500.00	IT Services	152117200000	132957
Mar-10	BEELINE	\$ 66,293.17	Business Analysts - Various	Various	1073957 release 83 / 1074476 release 1
Mar-10	Various	\$ 134.96	Project Management - Business Travel Expenditures	N/A	N/A
Mar-10	Various	\$ 45.00	Project Management - Office and Postage (Bill Redesign CSR Trainin	N/A	N/A
Mar-10	Beeline	\$ 175,601.08	IT Services	Various	1073957
Mar-10	Black & Veatch	\$ 14,580.00	IT Services	892527200000	1052492
Mar-10	Capstone	\$ 31,795.20	IT Services	889907200000	1059890
Mar-10	GXS	\$ 47,000.00	IT Services	Various	1046765
Mar-10	IBM	\$ 3,153.50	IT Services	Various	1064035
Mar-10	Internal	\$ 81,629.50	IT Services	N/A	N/A
Mar-10	MISC	\$ 1,074.71	IT Services	Various	Various
Mar-10	Regulus	\$ 16,734.38	IT Services	54017200000	126549
Mar-10	Various	\$ (43,692.85)	IT Services	Various	Various
Mar-10	Ventyx	\$ 236,951.62	IT Services	Various	132954
Apr-10	Internal	\$ 62,342.75	Project Management - Labor (Fully Loaded)	N/A	N/A
Apr-10	Accenture	\$ 430,593.75	IT Services	496727200000	132957
Apr-10	BEELINE	\$ 71,579.84	Business Analysts - Various	Various	1073957 release 83 / 1074476 release 1
Apr-10	Various	\$ 10.00	Project Management - Business Travel Expenditures	N/A	N/A
Apr-10	Beeline	\$ 209,335.75	IT Services	Various	1073957
Apr-10	Black & Veatch	\$ 48,421.16	IT Services	661047200000	1052492
Apr-10	Capstone	\$ 51,444.80	IT Services	976737200000	1059890
Apr-10	IBM	\$ 9,497.50	IT Services	Various	1064035
Apr-10	Internal	\$ 73,763.10	IT Services	N/A	N/A
Apr-10	MISC	\$ 1,056.73	IT Services	Various	Various
Apr-10	Regulus	\$ 16,070.31	IT Services	Various	126549
Apr-10	Various	\$ (226,462.25)	IT Services	Various	Various
Apr-10	Ventyx	\$ 313,938.21	IT Services	Various	132954
May-10	Internal	\$ 71,628.92	Project Management - Labor (Fully Loaded)	N/A	N/A
May-10	Accenture	\$ 259,775.00	IT Services	733247200000	132957
May-10	BEELINE	\$ 90,499.19	Business Analysts - Various	Various	1073957 release 83 / 1074476 release 1
May-10	Various	\$ 89.00	Project Management - Business Travel Expenditures	N/A	N/A
May-10	Beeline	\$ 181,626.87	IT Services	Various	1073957
May-10	Black & Veatch	\$ 58,909.98	IT Services	621357200000	1052492
May-10	IBM	\$ 7,721.00	IT Services	Various	1064035
May-10	Internal	\$ 83,504.44	IT Services	N/A	N/A
May-10	Various	\$ 143,185.25	IT Services	Various	Various
May-10	Ventyx	\$ 45,347.76	IT Services	Various	132954
Total Capital		\$ 8,172,921.67			
Total O&M and Capital		\$ 10,665,923.14			

ICC Docket No. 10-0138

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
TEE 2.01 – 2.10
Dated: July 19, 2010**

REQUEST NO. TEE 2.02:

Please provide support in the level of detail agreed to in the testimony referenced in TEE 2.01 above for the revised estimate of \$22.1 million as discussed in ComEd Ex. 4.0, p. 2, lines 37 – 43. Include in such support any contracts or other agreements in place for such costs.

RESPONSE:

ComEd objects to this data request to the extent it requests information that does not exist. The amount of detail provided in response to TEE 2.01 includes bills and charges received or accrued through May 31, 2010. All remaining costs are estimates, and thus the level of detail requested in this data request for costs not yet incurred is not available at this time. ComEd further notes that by providing information in response to this data request it does not concede that this information is relevant to any issue in this docket.

Without waiving these objections, ComEd states as follows. Please see TEE 2.02_Attach 1 (CONFIDENTIAL) through TEE 2.02_Attach 13 (CONFIDENTIAL). This confidential supporting documentation includes vendor Scope of Work documents, Task Orders, contracts, and other agreements. In order to leverage the greatest savings, negotiations with vendors may include projects for both ComEd and PECO Energy Company, each of which is an energy delivery company that shares the same ultimate parent company, Exelon. As a result, the attached documentation may, in some instances, relate to projects other than PORCB. The information provided in TEE 2.01, however, relates only to Rider PORCB.

ComEd further notes that its search for documentation for one vendor, Beeline, is still in process, and ComEd will supplement this response as soon as any documentation is collected.