

**Commonwealth Edison Company's Verified Reply to the
Administrative Law Judge's October 26, 2010 Post-Record Data Request**

Administrative Law Judge Request:

Notice is hereby given that pursuant to 83 Ill. Adm. Code 200.875, the Administrative Law Judge hereby issues this post-record data request for certain calculations and numerical analyses. Commonwealth Edison Company ("ComEd") is hereby directed to provide a set of schedules showing an uncollectibles factor calculated in a manner is described in the October 7, 2010 proposed order in this proceeding. Specifically, ComEd is directed to calculate a combined uncollectibles factor residential and commercial customers. The single combined uncollectible factor for residential and commercial customers shall be a weighted average calculated dividing the total uncollectible expense for UCB/POR eligible customers of ComEd by the total revenue of ComEd for UCB/POR eligible customers, using date from the most recently-available calendar year. It is intended that this weighted average uncollectibles factor shall be derived in the manner used by the Commission in Docket Nos. 08-0619 (Ameren's UCB/POR docket) as shown on Ameren Exhibit filed on December 22, 2008 in that proceeding. A copy of that Exhibit is attached hereto.

ComEd's Verified Reply:

As an initial matter and follow up to ComEd's Verified Response of October 28, 2010, ComEd notes that it continues to work toward the provision of the data and calculations on or before November 8, 2010 that were requested by the Administrative Law Judge.

With respect to the potential adoption of an uncollectibles rate derived in the manner set forth in the October 26, 2010 request from the Administrative Law Judge, ComEd reiterates its objection to such a methodology. The only purpose served by an averaging of historic residential and non-residential rates uncollectibles rates – regardless of whether calculated as a weighted or simple average – is to further disconnect the discount rate charged for the purchase of receivables and consolidated billing from ComEd's cost of service and the traditional ratemaking principle of cost causation. Such an averaging, generally speaking, will cause the charges to RESs serving residential customers under Rider PORCB to be below cost (*i.e.*, below ComEd's bad debt risk), while pushing the charges to RESs serving non-residential customers with demands below 400 kW above cost (*i.e.*, above ComEd's bad debt risk). In addition to further discouraging RESs from utilizing PORCB to serve its non-residential customers, averaging the rates in this manner likely will cause an under recovery of bad debt expense associated with residential customers served via Rider PORCB, all else being equal. For the foregoing reasons, ComEd opposes the averaging of the uncollectibles rates as described in the October 26, 2010 Post-Record Date Request from the Administrative Law Judge.

Without waiving these objections, ComEd concurs with the positions taken by ICC Staff in its response of October 29, 2010 and by Dominion Retail, Inc. in its response of November 1, 2010, which both favor the use of the system average supply uncollectibles

value derived from Rider UF. In ComEd's opinion, if the Commission decides to reject the reasonable discount rate produced by the settlement with ICEA, RESA and CUB and to deviate from cost-based rates and traditional ratemaking principles in such a manner, this approach will at least make it easier and less costly and burdensome for ComEd to implement.

STATE OF ILLINOIS)
) SS.
COUNTY OF COOK)

VERIFICATION

I, Robert Garcia, first being duly sworn, state that I have read the foregoing “Commonwealth Edison Company’s Verified Reply to the Administrative Law Judge’s October 26, 2010 Post-Record Data Request” and that the facts and results stated therein are true and correct to the best of my knowledge and belief.



Robert Garcia

Subscribed and sworn to before
me this 4th day of November, 2010.



Notary Public

