

STATE OF ILLINOIS



ILLINOIS COMMERCE COMMISSION

Office of General Counsel

November 12, 2010

VIA ELECTRONIC FILING

Administrative Law Judge Sainsot
Hearings and Orders
Illinois Commerce Commission
160 N. LaSalle Street, Suite C-800
Chicago, Illinois 60601
Cc: Service List, Docket No. 10-0138

RE: Docket No. 10-0138 - Staff's Response to Commonwealth Edison Company's Verified Response to the Administrative Law Judge's October 26, 2010 Post-Record Data Request

Dear Administrative Law Judge Sainsot:

Having reviewed ComEd's Supplemental Response to the Administrative Law Judge's October 26, 2010 Post-Record Data Request, Staff offers the following.

Based on Staff's review of the calculations found in Attachment 1 to ComEd's Supplemental Response, it appears that the uncollectible factor was calculated in a manner that is not consistent with the calculation used by Ameren Illinois in Docket Nos. 08-0619/0620/0621 (Cons). However, for purposes of establishing a PORCB discount rate, Staff does not see a benefit in spending further time and resources on attempts to produce a calculation that matches the one undertaken by Ameren Illinois.

Staff reiterates its position previously stated in its comments on ComEd's initial response to the ALJ's Post-Record Data Request, which was filed on October 29, 2010. As explained therein, the non-residential factor found in Rider UF was used by Staff when calculating various potential PORCB discount rates and neither ComEd nor any other party objected to Staff's calculations. Given that the non-residential uncollectible factor found in Rider UF, and referenced in the PORCB tariffs, includes uncollectible expenses for all non-residential customers, Staff does not object to using the same factor when calculating a combined uncollectibles value for residential and non-residential customers for purposes of the PORCB tariffs. To put it differently, if the Commission finds that a combined uncollectibles factor should be used for calculating

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the PORCB discount rate, Staff has no objections to using the system average supply uncollectibles value of 1.52% as provided by ComEd in its October 28, 2010 response to the Administrative Law Judge's Post-Record Data Request.

Respectfully,

/s/ _____

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