

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

ILLINOIS POWER AGENCY :  
 :  
Petition for Approval of the : No. 10-0563  
 :  
220 ILLS 5/16-111.5(d) Procurement Plan :

**COMMONWEALTH EDISON COMPANY’S MOTION  
FOR LEAVE TO FILE UPDATED LOAD FORECAST**

Commonwealth Edison Company (“ComEd”), pursuant to Section 200.190 of the Illinois Commerce Commission’s (“Commission”) Rules of Practice, 83 Ill. Adm. Code § 200.190, respectfully moves the Administrative Law Judge (“ALJ”) for leave to file updated load forecasts as proposed in previous filings. In support of this motion, ComEd states:

1. In Commonwealth Edison Company’s Verified Objections to The Procurement Plan of The Illinois Power Agency (“ComEd Objections”) filed October 4, 2010, ComEd recommend that the Procurement Plan (“Plan) of the Illinois Power Agency (“IPA”) be revised to incorporate an updated load forecast, stating as follows:

[I]t has been the practice in past procurement cycles for ComEd to update some information in its forecast, based on data available now that was not available in July, and to present the updated forecast in the pleadings and testimony submitted in the procurement proceeding. ComEd intends to continue that practice in this proceeding. The updated information will be available in early November 2010. ComEd will submit it at that time. ComEd recommends that the Plan be revised to incorporate that updated forecast.

ComEd Objections, p. 24 (footnotes omitted).

2. In the Verified Response of The Illinois Power Agency to The Objections to The 220 ILCS 5/16-111.5(d) Power Procurement Plan (“IPA Response to Objections”), the IPA stated that “[it] agrees that the Plan should be revised to incorporate ComEd’s updated forecast, which ComEd states will be provided in early November 2010.” IPA Response to Objections,

pp. 8-9. In ComEd's Verified Reply to Certain Responses to the Objections to the Procurement Plan ("ComEd Reply"), ComEd indicated that no other party addresses this issue and that it would provide an updated load forecast when available in November. ComEd Reply, p. 18.

3. Attached to this Motion as Appendix A is ComEd's updated load forecast, including updated attachments and tables to the IPA's Plan based on the updated load forecast. The updated load forecast is approximately 460 GWh lower for Plan Year 2011 because of lower load growth.

WHEREFORE, Commonwealth Edison Company respectfully requests that it be given leave to file its updated load forecast attached hereto as Attachment A for incorporation into the IPA's Plan.

Dated: November 16, 2010

Respectfully submitted,



By: \_\_\_\_\_  
One of the attorneys for  
Commonwealth Edison Company

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Counsel for Commonwealth Edison Company

**VERIFICATION**

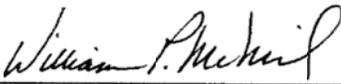
STATE OF ILLINOIS     )  
  )  
COUNTY OF COOK     )     SS.

I, William P. McNeil, having been duly sworn, do hereby say and depose under oath based on my personal knowledge as follows:

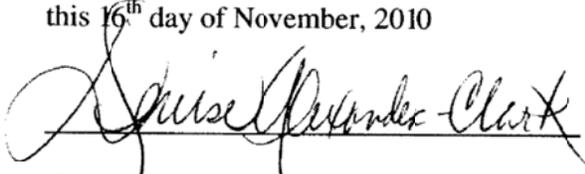
1. I am Vice President – Energy Acquisition for Commonwealth Edison Company (“ComEd”) and have responsibility for managing power procurement requirements to serve ComEd’s retail and wholesale load obligations.

2. I swear and affirm that the facts stated in the foregoing Commonwealth Edison Company’s Motion for Leave to File Updated Load Forecast, including the updated load forecast attached as Appendix A, are true and correct to the best of my knowledge and ability.

FURTHER AFFIANT SAYETH NOT.

  
\_\_\_\_\_  
William P. McNeil

SUBSCRIBED AND SWORN to before me  
this 16<sup>th</sup> day of November, 2010

  
\_\_\_\_\_  
Notary Public

