

X. OTHER

A. RES Services Issues

1. ComEd should provide RESs with historical interval data requests within one (1) business day

Receiving historical interval data the next business day is something to which ARES have become accustomed to and count on for their day-to-day business operations. As the competitive retail market continues to expand, obtaining data as soon as possible following a request will be increasingly important. (Fein Dir., ICEA Ex. 1.0, pp. 5-6.) If a request for historical interval data is submitted by 5 p.m., ComEd has indicated that it will provide the requested data the next business day, except as precluded by communications failure or other unforeseen barrier. ComEd has indicated a willingness to add to its RES handbook language regarding the deadline for submitting requests in order to receive the requested data the next business day (barring the limited exception noted above), which satisfies ICEA's concerns. (Fein Reb., ICEA Ex. 2.0, pp. 4-5.)

2. ComEd should support use by a RES of multiple DUNS +4 numbers

ICEA recommends that ComEd allow RESs to have multiple DUNS + 4 numbers. (Fein Dir., ICEA Ex. 1.0, pp. 6-7.) ComEd indicated that, subject to technical limitations and cost recovery, they are open to the idea of implementing this recommendation in 2011, and saw no reason that would preclude using the same framework that PJM does regarding limits on the number of sub-accounts and rules for sub-accounts. ComEd has indicated that they will utilize their best efforts to put this recommendation into effect as soon as possible in 2011, which is acceptable to ICEA. (Fein Reb., ICEA Ex. 2.0, p. 5.)

3. ComEd's initial 814 Change response should include an Effective Date

ICEA recommended that an effective date be added to the EDI 814 change request. (Fein Dir., ICEA Ex. 1.0, pp. 7-8.) An earlier eligibility review process described by ComEd satisfies ICEA's concerns regarding confusion regarding effective date for an initial SBO eligibility/enrollment. As to mid-contract changes, we await the effects of the new EDI standards, and suggest an addition or correction to the RES Handbook. (Fein Reb., ICEA Ex. 2.0, pp. 6-7.)

4. Changes to the PowerPath website

ICEA recommended that ComEd reinstate the display of certain information on its PowerPath website, and that it develop a test site for future PowerPath changes, with releases during non-business hours and not over a holiday weekend. (Fein Dir., ICEA Ex. 1.0, pp. 10-12.) Based on ComEd representations, ICEA believes that ComEd's bill estimator tool resolves concerns regarding access to information on the PowerPath website. As to future changes to the site, ICEA recommends the initiation of a test site, which is the best mechanism to evaluate the effect that potential changes to the Power Path site may cause. ICEA also recommends that a technical working group be established. ComEd's commitment to a minimum of twenty (20) days advance notice regarding future changes to the Power Path site, with notification and discussion on each of the RES operational calls, as well as the technical working group, may be acceptable. However, more significant changes to the Power Path site may require even longer advance notice. (Fein Reb., ICEA Ex. 2.0, pp. 10-12.)

D. Meters and Meter Reading

The problem of unread or unbilled accounts has been significant since the beginning of the year, causing problems for RESs and customers. (Fein Dir., ICEA Ex. 1.0, pp. 8-9.) ComEd has indicated informally that it is establishing processes and developing a plan to resolve the problem, but a comprehensive, detailed written plan for resolving this issue has not yet been provided. In the interim, ICEA recommends that ComEd: (1) send out communications to customers describing the circumstances giving rise to the situation, making it clear to customers that ComEd has experienced difficulties that have prohibited it (and may continue to prohibit it) from providing the necessary data to ARES from which an ARES bills its customers; and (2) enhance its update to ARES, providing a weekly report regarding progress in resolving the issue, as well as expectations for the coming weeks, identifying those situations in which meter readings are delayed based on restricted access to the meter. (Fein Reb., ICEA Ex. 2.0, pp. 8-10.)

E. Competitive Retail Market Development Issues

As a result of the roll-out of ComEd's purchase of receivables / utility consolidated billing program, and to further promote the development of competition for residential customers, ICEA recommends that ComEd develop and/or provide the following:

- 1. A simple and straightforward Price-to-Compare (PTC)** (Fein Dir., ICEA Ex. 1.0, p. 12.)

ComEd's indicated willingness to determine and provide fixed price supply charges under Rate BES for customers with demands under 100kW in large measure resolves ICEA's concerns, provided that the customer choice page is easy to find on ComEd's web site, and the PTC is prominently displayed on that page. This

recommendation is not meant to foreclose or in any way supplant the Office of Retail Market Development's "Plugged In Illinois" efforts, or its desire to establish a Commission-based PTC site. (Fein Reb., ICEA Ex. 2.0, pp. 12-13.)

2. Creation of an "Eligible Customer List" of residential customers (Fein Dir., ICEA Ex. 1.0, p. 12.)

ICEA recognizes that there may be legal questions involved in producing such a list, and recommends that the issue be discussed further with the Commission Office of General Counsel and the Attorney General's Office and other interested stakeholders. (Fein Reb., p. 14.)

F. New Section 9-250 Investigation of ComEd's electric rate design

ICEA supports ORMD's efforts to develop a more robust competitive market in the ComEd service territory. (Fein Reb., ICEA Ex. 2.0, p. 16.)

**G. Other
PORCB**

The costs associated with changes that are new and specific to PORCB service alone are theoretically appropriate for inclusion for recovery in PORCB (if approved in the appropriate docket, after having been found to be just and reasonable). However, to the extent that the changes or upgrades were made that are not specific to PORCB service itself, or that benefit ComEd and its customers in other ways, the associated costs are more appropriate for rate base recovery. (Fein Dir., ICEA Ex. 1.0, pp. 6-7; Fein Reb., ICEA Ex. 2.0, pp. 14-15.)

Respectfully Submitted,

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Dated: January 7, 2011