

BEFORE THE  
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY)

)

)

Proposal to establish Rider PORCB, )

Docket No. 10-0138

Purchase of Receivables with )

Consolidated Billing, )

And to revise other related tariffs )

**RESPONSE OF DOMINION RETAIL INC. TO STAFF MOTION FOR  
CLARIFICATION**

Now comes Dominion Retail Inc. (“Dominion”), through its attorneys, and pursuant to ICC Rule of Practice 83 IAC 200.190, files this response to the Staff Emergency Motion For Clarification of February 9, 2011 Amendatory Order.

Dominion agrees with the Staff that the Amendatory Order contains some inconsistencies. More specifically, Dominion agrees with the Staff that if the Commission intended to (1) retain the provision that ComEd should recover its start up costs through a \$0.50 per month charge, and (2) require ComEd to use a blended rate of 1.8453% for the uncollectible charge rather than separate rates for residential and commercial customers contained in ComEd Rider UF<sup>1</sup>, then the Commission should modify its Amended Order in the manner suggested by the Staff. More specifically, the Commission would make the modifications set out on page 6 of the Staff’s Motion and strike Section G in its entirety.

Dominion makes these recommendations with the understanding that it does not agree with the decision to recover start up costs through a \$0.50 per month charge and reserves its right to challenge that decision for the reasons set out in its Application for

---

<sup>1</sup> Dominion agrees with Staff that the figure contained in the Amended Order of 1.843 appears to be a typographical error.

Rehearing of the original final Order dated December 15, 2010. For the reasons it provided in its Application for Rehearing, Dominion does agree however, that ComEd should use a blended uncollectible charge. Thus, Dominion supports the proposal of the Staff to correct the Order to reflect the Commission's apparent intention to require ComEd to use a blended uncollectible charge.

Finally, Dominion agrees with the Staff that until the Commission clarifies its Amended Order, it is important to maintain the status quo so retail energy suppliers can continue to utilize ComEd's Rider PORCB for their customers.

WHEREFORE, Dominion requests that the Commission clarify its Amended Order as set forth above and allow Rider PORCB to remain in place until that clarification is accomplished.

Dated: February 17, 2011

Respectfully submitted,  
Dominion Retail, Inc.

/s/ Stephen J. Moore  
By: Stephen J. Moore

Stephen J. Moore  
Thomas H. Rowland  
Kevin D. Rhoda  
Rowland & Moore LLP  
200 West Superior Street  
Suite 400  
Chicago, Illinois 60654  
(312) 803-1000 (voice)  
(312) 803-0953 (fax)  
[steve@telecomreg.com](mailto:steve@telecomreg.com)  
[tom@telecomreg.com](mailto:tom@telecomreg.com)  
[krhoda@telecomreg.com](mailto:krhoda@telecomreg.com)

ATTORNEYS FOR Dominion Retail, Inc.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of Dominion Retail, Inc.'s Response to the Staff Motion for Clarification has been served upon the parties reported by the Clerk of the Commission as being on the service list of this docket, on the 17<sup>th</sup> day of February, 2011, by electronic mail.

*/s/ Stephen J. Moore* \_\_\_\_\_  
Stephen J. Moore  
Rowland & Moore LLP  
200 West Superior Street  
Suite 400  
Chicago, Illinois 60654  
(312) 803-1000  
steve@telecomreg.com

ATTORNEY FOR Dominion Retail, Inc.