

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 1.01 – 1.09

Date Received: May 10, 2011

Date Served: June 17, 2011

REQUEST NO. JLH 1.01:

Please refer to "10-0537 ComEd Rider EDA Staff DR JLH 1 Attach 1". Complete the table contained in the unlocked spreadsheet found in the tab "JLH 1.01 PY2PlanBudget" with the planned costs and other requested items for ComEd's energy efficiency portfolio approved in Docket No. 07-0540 for PY2. Provide all supporting workpapers and documentation in unlocked spreadsheets and Microsoft Word, where applicable.

CORRECTED RESPONSE:

Please see the attachment labeled as JLH 1.01 CORRECTED_Attach 1, which contains the completed spreadsheet under the "JLH 1.01 CORRECTEDPY2PlanBudget" tab. Based on the budgeted program costs set forth in Appendix D to ComEd's 2008 – 2010 Energy Efficiency and Demand Response Plan, ComEd undertook a reasonable allocation of the budgeted costs to categorize them as requested in the table. Workpapers and documentation associated with this data are part of ComEd's filing in ICC Docket No. 07-0540 and can be found primarily in ComEd Ex. 1.0 and ComEd Ex. 6.0 in that docket.

ComEd Program Year 2 Planned Costs

ComEd's Approved Budgeted Costs for Planning Purposes (Docket No. 07-0540) (1)									
	Contractor Costs <i>a</i>	Incentive Costs <i>b</i>	Marketing Costs <i>c</i>	TOTAL Non-Labor Costs <i>d</i> <i>a+b+c</i>	ComEd Labor Costs <i>e</i>	TOTAL Budgeted Costs <i>f</i> <i>d+e</i>	Savings Targets (MWh) <i>g</i>	Savings Targets (MW) <i>h</i>	TRC <i>i</i>
RESIDENTIAL EE PROGRAM COSTS									
Residential Lighting	\$ 1,620,000	\$ 8,090,000	\$ 1,860,000	\$ 11,570,000	\$ 400,000	\$ 11,970,000	126,349	12.0	2.90
Appliance Recycling	\$ 1,780,000	\$ 1,490,000	\$ 740,000	\$ 4,010,000	\$ 740,000	\$ 4,750,000	18,358	2.9	1.35
Multi-family All-electric Sweep	\$ 140,000	\$ 350,000	\$ 140,000	\$ 630,000	\$ 140,000	\$ 770,000	2,369	0.2	1.33
Single Family Home Performance	\$ 170,000	\$ 250,000	\$ 74,000	\$ 494,000	\$ 74,000	\$ 568,000	1,407	0.0	1.04
HVAC Diagnostics & w/Quality Installation (CACES) (2)	\$ 950,000	\$ 3,430,000	\$ 690,000	\$ 5,070,000	\$ 690,000	\$ 5,760,000	9,029	12.2	1.17 / 1.11
Total Residential Programs	\$ 4,660,000	\$ 13,610,000	\$ 3,504,000	\$ 21,774,000	\$ 2,044,000	\$ 23,818,000			
C&I EE PROGRAM COSTS									
C&I Prescriptive	\$ 2,790,000	\$ 9,300,000	\$ 930,000	\$ 13,020,000	\$ 930,000	\$ 13,950,000	86,510	24.7	1.25
C&I Custom	\$ 1,690,000	\$ 6,740,000	\$ 340,000	\$ 8,770,000	\$ 1,690,000	\$ 10,460,000	74,475	13.7	2.10
C&I Retrocommissioning	\$ 380,000	\$ 1,270,000	\$ 380,000	\$ 2,030,000	\$ 380,000	\$ 2,410,000	6,456	0.7	1.11
C&I New Construction	\$ 50,000	\$ 330,000	\$ 50,000	\$ 430,000	\$ 50,000	\$ 480,000	596	0.3	1.06
Total C&I Programs	\$ 4,910,000	\$ 17,640,000	\$ 1,700,000	\$ 24,250,000	\$ 3,050,000	\$ 27,300,000			
DEMAND RESPONSE COSTS									
Central AC Cycling	n/a	n/a	n/a	n/a	n/a	\$ 1,000,000			
DCEO PROGRAM COSTS									
Measurement & Verification (DCEO Only) (3)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DCEO (Excluding M&V)	n/a	n/a	n/a	n/a	n/a	\$ 19,783,000	81,654	n/a	n/a
OTHER PORTFOLIO COSTS									
EIO / Energy Star	n/a	n/a	n/a	n/a	n/a	\$ 600,000			
Educational Outreach	n/a	n/a	n/a	n/a	n/a	\$ 1,500,000			
R&D / Emerging Technologies	n/a	n/a	n/a	n/a	n/a	\$ 1,100,000			
Measurement & Verification (3)	n/a	n/a	n/a	n/a	n/a	\$ 2,448,000			
Portfolio Administration	n/a	n/a	n/a	n/a	n/a	\$ 3,990,000			
Total Other						\$ 9,638,000			
Total Portfolio	\$ 9,570,000	\$ 31,250,000	\$ 5,204,000	\$ 46,024,000	\$ 5,094,000	\$ 81,539,000	407,203		
Total Portfolio - ComEd only	\$ 9,570,000	\$ 31,250,000	\$ 5,204,000	\$ 46,024,000	\$ 5,094,000	\$ 61,756,000	\$ 325,549	66.7	2.84

Source: ICC Docket No. 07-0540, ComEd Ex. 1.0, ComEd's 2008 - 2010 Energy Efficiency and Demand Response Plan as Approved by the Commission

Notes

(1) ComEd's first Plan allocated costs into four categories - Incentive Costs, Admin Costs, Marketing Costs, and Implementation Costs (see Commonwealth Edison Company's 2008 -2010 Energy Efficiency and Demand Response Plan ("ComEd's First Plan"), Appendix D: Program Documentation). For this data request, Incentive Costs and Marketing Costs are separately identified. Implementation costs are in the Contractor cost category. Administration costs are in the ComEd Labor Cost Category.

(2) HVAC Diagnostics & w/Quality Installation (CACES) is a combination of the Residential AC Tuneup program element and the Residential New HVAC program element from ComEd's First Plan.

(3) No distinction was made between ComEd and DCEO M&V costs in ComEd's First Plan

ComEd Program Year 2 Expenses

Energy Efficiency Expenses												
	Contractor Costs a	Incentive Costs b	Marketing Costs c	TOTAL Non-Labor Costs d a+b+c	ComEd Labor Costs (Salaries and Payroll Taxes Excluding Benefits and Incentive Compensation) (1) e	ComEd Labor Costs (Benefits only) (1) f	ComEd Labor Costs (Incentive Compensation) (1) g	Total ComEd Labor Costs (2) (3) h e+f+g	TOTAL Expenses i d+h	Ex Post Savings (MWH) j	Ex Post Savings (MW) k	TRC l
RESIDENTIAL EE PROGRAM COSTS												
Residential Lighting	\$ 2,206,538	\$ 9,074,820	\$ 409,989	\$ 11,691,347	n/a	n/a	n/a	\$ 179,004	\$ 11,870,351	202,557	28.40	5.84
Appliance Recycling	\$ 2,325,217	\$ 641,200	\$ 680,186	\$ 3,646,603	n/a	n/a	n/a	\$ 109,020	\$ 3,755,623	32,624	5.45	3.97
Multi-family All-electric Sweep	\$ 360,766	\$ 456,884	\$ 4,747	\$ 822,397	n/a	n/a	n/a	\$ 33,237	\$ 855,634	1,840	0.15	2.50
Single Family Home Performance	\$ 137,185	\$ 198,628	\$ 37,528	\$ 373,341	n/a	n/a	n/a	\$ 33,237	\$ 406,578	638	0.06	0.95
HVAC Diagnostics & w/Quality Installation (CACES)	\$ 1,193,824	\$ 1,581,450	\$ 144,651	\$ 2,919,925	n/a	n/a	n/a	\$ 73,799	\$ 2,993,724	1,964	3.82	0.33
Total Residential Programs	\$ 6,223,530	\$ 11,952,982	\$ 1,277,101	\$ 19,453,613	\$ -	\$ -	\$ -	\$ 428,297	\$ 19,881,910			
C&I EE PROGRAM COSTS												
C&I Prescriptive	\$ 4,047,876	\$ 12,927,653	\$ 173,000	\$ 17,148,529	n/a	n/a	n/a	\$ 244,390	\$ 17,392,919	209,151	35.61	2.60
C&I Custom	\$ 1,011,295	\$ 2,641,511	\$ 43,250	\$ 3,696,056	n/a	n/a	n/a	\$ 61,097	\$ 3,757,153			
C&I Retrocommissioning	\$ 650,631	\$ 1,382,590	\$ 3,270	\$ 2,036,491	n/a	n/a	n/a	\$ 130,457	\$ 2,166,948	6,574	1.03	1.41
C&I New Construction	\$ 485,723	\$ 86,425	\$ 6,650	\$ 578,798	n/a	n/a	n/a	\$ 62,090	\$ 640,888	803	0.17	0.87
Total C&I Programs	\$ 6,195,525	\$ 17,038,179	\$ 226,170	\$ 23,459,874	\$ -	\$ -	\$ -	\$ 498,034	\$ 23,957,908			
DEMAND RESPONSE COSTS												
Central AC Cycling	\$ 294,803	\$ 74,995	\$ 449,347	\$ 819,145	n/a	n/a	n/a	\$ -	\$ 819,145	n/a	13.60	3.73
DCEO PROGRAM COSTS												
Measurement & Verification (DCEO Only)	\$ 278,328	\$ -	\$ -	\$ 286,739	n/a	n/a	n/a	\$ -	\$ 286,739	n/a	n/a	n/a
DCEO	\$ 11,471,616	\$ -	\$ -	\$ 11,471,616	n/a	n/a	n/a	\$ -	\$ 11,471,616	n/a	n/a	n/a
OTHER PORTFOLIO COSTS												
EIO / Energy Star	\$ 579,438	\$ -	\$ 38,939	\$ 618,377	n/a	n/a	n/a	\$ -	\$ 618,377			
Educational Outreach	\$ 423,138	\$ -	\$ 607,903	\$ 1,031,041	n/a	n/a	n/a	\$ -	\$ 1,031,041			
R&D / Emerging Technologies	\$ 1,026,174	\$ -	\$ -	\$ 1,026,174	n/a	n/a	n/a	\$ -	\$ 1,026,174			
Measurement & Verification (ComEd Only)	\$ 2,090,940	\$ -	\$ -	\$ 2,090,940	n/a	n/a	n/a	\$ -	\$ 2,090,940			
Portfolio Administration	\$ 936,640	\$ -	\$ -	\$ 936,640	n/a	n/a	n/a	\$ 1,422,985	\$ 2,359,625			
Total Other	\$ 5,056,330	\$ -	\$ 646,842	\$ 5,703,172				\$ 1,422,985	\$ 7,126,157			
Total Portfolio	\$ 29,520,132	\$ 29,066,156	\$ 2,599,460	\$ 61,194,159	n/a	n/a	n/a	\$ 2,349,316	\$ 63,543,475	n/a	n/a	n/a
Total Portfolio - ComEd only	\$ 17,770,188	\$ 29,066,156	\$ 2,599,460	\$ 49,435,804	n/a	n/a	n/a	\$ 2,349,316	\$ 51,785,120	456,151	88.29	2.84

(1) - ComEd does not capture labor costs at the program level, so the requested detail is "not available" ("n/a")
 (2) - "Total ComEd Labor Costs" only reflects Labor Costs associated with Rider EDA employees (i.e., non-Rider employee costs are not included)
 (3) - "Total ComEd Labor Costs" reflects an allocation of Labor costs based on a survey of amount of time Rider EDA employees spend on each program

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 1.01 – 1.09

Date Received: May 10, 2011

Date Served: May 24, 2011

REQUEST NO. JLH 1.01:

Please refer to "10-0537 ComEd Rider EDA Staff DR JLH 1 Attach 1". Complete the table contained in the unlocked spreadsheet found in the tab "JLH 1.01 PY2PlanBudget" with the planned costs and other requested items for ComEd's energy efficiency portfolio approved in Docket No. 07-0540 for PY2. Provide all supporting workpapers and documentation in unlocked spreadsheets and Microsoft Word, where applicable.



Staff DR JLH
1.01_Attach 1.xls

RESPONSE:

Please see the attachment labeled as JLH 1.01_Attach 1, which contains the completed spreadsheet under the "JLH 1.01 PY2PlanBudget" tab. Based on the budgeted program costs set forth in Appendix D to ComEd's 2008 – 2010 Energy Efficiency Demand Response Plan, ComEd undertook a reasonable allocation of the budgeted costs to categorize them as requested in the table. Workpapers and documentation associated with this data are part of ComEd's filing in ICC Docket No. 07-0540 and can be found primarily in ComEd Ex. 1.0 and ComEd Ex. 6.0 in that docket.

ComEd Program Year 2 Planned Costs

	ComEd's Approved Budgeted Costs for Planning Purposes (Docket No. 07-0540) (1)					TOTAL Budgeted Costs	Savings Targets (MWh)	Savings Targets (MW)	TRC
	Contractor Costs	Incentive Costs	Marketing Costs	TOTAL Non-Labor Costs	ComEd Labor Costs				
	a	b	c	d	e				
				a+b+c					
	f	g	h	i	d+e				
RESIDENTIAL EE PROGRAM COSTS									
Residential Lighting	\$ 2,020,000	\$ 8,090,000	\$ 1,860,000	\$ 11,970,000	n/a	\$ 11,970,000	126,349	12.0	2.90
Appliance Recycling	\$ 2,530,000	\$ 1,490,000	\$ 740,000	\$ 4,760,000	n/a	\$ 4,760,000	18,358	2.9	1.35
Multi-family All-electric Sweep	\$ 270,000	\$ 350,000	\$ 140,000	\$ 760,000	n/a	\$ 760,000	2,369	0.2	1.33
Single Family Home Performance	\$ 246,000	\$ 250,000	\$ 74,000	\$ 570,000	n/a	\$ 570,000	1,407	0.0	1.04
HVAC Diagnostics & w/Quality Installation (CACES) (2)	\$ 1,630,000	\$ 3,430,000	\$ 690,000	\$ 5,750,000	n/a	\$ 5,750,000	9,029	12.2	1.17 / 1.11
Total Residential Programs	\$ 6,696,000	\$ 13,610,000	\$ 3,504,000	\$ 23,810,000	n/a	\$ 23,810,000			
C&I EE PROGRAM COSTS									
C&I Prescriptive	\$ 3,720,000	\$ 9,300,000	\$ 930,000	\$ 13,950,000	n/a	\$ 13,950,000	86,510	24.7	1.25
C&I Custom	\$ 3,370,000	\$ 6,740,000	\$ 340,000	\$ 10,450,000	n/a	\$ 10,450,000	74,475	13.7	2.10
C&I Retrocommissioning	\$ 770,000	\$ 1,270,000	\$ 380,000	\$ 2,420,000	n/a	\$ 2,420,000	6,456	0.7	1.11
C&I New Construction	\$ 100,000	\$ 330,000	\$ 50,000	\$ 480,000	n/a	\$ 480,000	596	0.3	1.06
Total C&I Programs	\$ 7,960,000	\$ 17,640,000	\$ 1,700,000	\$ 27,300,000	n/a	\$ 27,300,000			
DEMAND RESPONSE COSTS									
Central AC Cycling	n/a	n/a	n/a	n/a	n/a	\$ 1,000,000			
DCEO PROGRAM COSTS									
Measurement & Verification (DCEO Only) (3)	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a	n/a
DCEO (Excluding M&V)	n/a	n/a	n/a	n/a	n/a	\$ 19,783,000	81,654	n/a	n/a
OTHER PORTFOLIO COSTS									
EIO / Energy Star	n/a	n/a	n/a	n/a	n/a	\$ 600,000			
Educational Outreach	n/a	n/a	n/a	n/a	n/a	\$ 1,500,000			
R&D / Emerging Technologies	n/a	n/a	n/a	n/a	n/a	\$ 1,100,000			
Measurement & Verification (3)	n/a	n/a	n/a	n/a	n/a	\$ 2,448,000			
Portfolio Administration	n/a	n/a	n/a	n/a	n/a	\$ 3,990,000			
Total Other						\$ 9,638,000			
Total Portfolio	\$ 14,656,000	\$ 31,250,000	\$ 5,204,000	\$ 51,110,000	n/a	\$ 81,531,000	407,203		
Total Portfolio - ComEd only	\$ 14,656,000	\$ 31,250,000	\$ 5,204,000	\$ 51,110,000	n/a	\$ 61,748,000	\$ 325,549	66.7	2.84

Source: ICC Docket No. 07-0540, ComEd Ex. 1.0, ComEd's 2008 - 2010 Energy Efficiency and Demand Response Plan as Approved by the Commission

Notes

- (1) ComEd's first Plan allocated costs into four categories - Incentive Costs, Admin Costs, Marketing Costs, and Implementation Costs (see Commonwealth Edison Company's 2008 -2010 Energy Efficiency and Demand Response Plan ("ComEd's First Plan"), Appendix D: Program Documentation). For this data request, Incentive Costs and Marketing Costs are separately identified. Admin costs and Implementation costs are combined in the Contractor cost category with minor adjustments to reflect the current spending screen. ComEd's First Plan did not separately allocate ComEd Labor costs by program, so the ComEd Labor Cost column is not available ("n/a")
- (2) HVAC Diagnostics & w/Quality Installation (CACES) is a combination of the Residential AC Tuneup program element and the Residential New HVAC program element from ComEd's First Plan.
- (3) No distinction was made between ComEd and DCEO M&V costs in ComEd's First Plan

ComEd Program Year 2 Expenses

	Energy Efficiency Expenses								TOTAL Expenses	Ex Post Savings (MWH)	Ex Post Savings (MW)	TRC
	Contractor Costs	Incentive Costs	Marketing Costs	TOTAL Non-Labor Costs	ComEd Labor Costs (Salaries and Payroll Taxes Excluding Benefits and Incentive Compensation) (1)	ComEd Labor Costs (Benefits only) (1)	ComEd Labor Costs (Incentive Compensation) (1)	Total ComEd Labor Costs (2) (3)				
	a	b	c	d	e	f	g	h				
				a+b+c				e+f+g				
RESIDENTIAL EE PROGRAM COSTS												
Residential Lighting	\$ 2,206,538	\$ 9,074,820	\$ 409,989	\$ 11,691,347	n/a	n/a	n/a	\$ 179,004	\$ 11,870,351	202,557	28.40	5.84
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R&D / Emerging Technologies	\$ 1,026,174	\$ -	\$ -	\$ 1,026,174	n/a	n/a	n/a	\$ -	\$ 1,026,174			
Measurement & Verification (ComEd Only)	\$ 2,090,940	\$ -	\$ -	\$ 2,090,940	n/a	n/a	n/a	\$ -	\$ 2,090,940			
Portfolio Administration	\$ 936,640	\$ -	\$ -	\$ 936,640	n/a	n/a	n/a	\$ 1,422,985	\$ 2,359,625			
Total Other	\$ 5,056,330	\$ -	\$ 646,842	\$ 5,703,172				\$ 1,422,985	\$ 7,126,157			
Total Portfolio	\$ 29,520,132	\$ 29,066,156	\$ 2,599,460	\$ 61,194,159	n/a	n/a	n/a	\$ 2,349,316	\$ 63,543,475	n/a	n/a	n/a
Total Portfolio - ComEd only	\$ 17,770,188	\$ 29,066,156	\$ 2,599,460	\$ 49,435,804	n/a	n/a	n/a	\$ 2,349,316	\$ 51,785,120	456,151	88.29	2.84

(1) - ComEd does not capture labor costs at the program level, so the requested detail is "not available" ("n/a")
 (2) - "Total ComEd Labor Costs" only reflects Labor Costs associated with Rider EDA employees (i.e., non-Rider employee costs are not included)
 (3) - "Total ComEd Labor Costs" reflects an allocation of Labor costs based on a survey of amount of time Rider EDA employees spend on each program

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 1.01 – 1.09

Date Received: May 10, 2011

Date Served: May 27, 2011

REQUEST NO. JLH 1.03:

Please refer to ComEd's Responses to Staff DR JLH 1.01 and 1.02 and page 3 of ComEd Ex. 1.0. Please precisely define the following terms and differentiate for items that ComEd defined differently in terms of planning versus actual implementation. Describe several actual examples for each.

- (a) Contractor Costs
- (b) Incentive Costs
- (c) Marketing Costs
- (d) Labor Costs
- (e) Savings Targets
- (f) Ex Post Savings
- (g) EIO / Energy Star Costs
- (h) Educational Outreach Costs
- (i) R&D / Emerging Technologies Costs
- (j) Measurement & Verification Costs
- (k) Portfolio Administration Costs
- (l) TRC

RESPONSE:

For the Plan, ComEd allocated program costs into four categories – Incentives, Admin, Marketing and Implementation costs. For modeling purposes, the admin, marketing and implementation costs were allocated as a percentage of the incentive costs. The percentages were based on other utilities' program data, ComEd and its expert consultant. Therefore, ComEd cannot directly equate the Plan costs into the four cost categories listed above (i.e., contractor, incentive, marketing, labor). For this set of DRs, the Plan's admin and implementation costs have been combined and allocated to the contractor cost category. ComEd has no labor allocation for its Plan that is identifiable on a program basis.

- (a) Contractor Costs – Costs paid to contractors. Examples include APT's work for the Residential Lighting program, KEMA's work for the Prescriptive program, and JACO Environmental's work for the Appliance Recycling program.
- (b) Incentive Costs – Costs associated with incentives paid to customers or contractors (depending on the program) to participate in a program. Examples include rebates paid in the C&I Prescriptive program, incentives paid in the Appliance Recycling program, and CFL cost reductions in the Residential Lighting program.

- (c) Marketing Costs – These include costs to market a program. Examples include bill inserts for the Appliance Recycling program, point of purchase displays for the Residential Lighting program and trade ally workshops for C&I programs.
- (d) Labor Costs – fully loaded costs associated with the incremental ComEd employees who are fully allocated to Rider EDA.
- (e) Saving Targets – amount of energy savings projected for each program. Please see the attachment to ComEd’s Response to Staff Data Request JLH 1.01 labeled as JLH 1.01_Attach 1 for each program’s targeted energy savings.
- (f) Ex Post Savings – net energy savings achieved based on analysis of independent evaluator. Please see the attachment to ComEd’s Response to Staff Data Request JLH 1.01 labeled as JLH 1.01_Attach 1 for each program’s ex post savings.
- (g) EIO / Energy Star Costs – costs associated with the Energy Insights Online and Energy Data Services programs for C&I customer. Examples include marketing costs to increase program participation and contractor costs to administer the program.
- (h) Education Outreach Costs – The education / outreach activities were designed to promote energy efficiency education in general as well as awareness of individual programs. Examples include outreach events, speaker’s bureau events and elementary school events.
- (i) R&D / Emerging Technologies Costs – These expenditures can be divided into three groups: (i) pilot programs (*e.g.*, Positive Energy Home Energy Reports, ComEd Community Energy Challenge), (ii) energy efficiency industry memberships (*e.g.*, Electric Power Research Institute, E-Source, Consortium for Energy Efficiency), and (iii) technology research.
- (j) Measurement & Verification Costs – These costs related to expenses incurred in retaining Navigant Consulting (formerly “Summit Blue Consulting”) to conduct the required independent evaluation function for the portfolio.
- (k) Portfolio Administration Costs – These expenditures generally included costs associated with internal ComEd labor for new, incremental positions added to implement ComEd’s Plan, market research and baseline studies across all customer classes, and implementation and management of the tracking system.
- (l) TRC – stands for Total Resource Cost test which is the required cost-effectiveness test in Illinois; usually presented as one number which is a benefit-cost ratio where a number greater than one equates to a cost-effective measure, program or portfolio

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 1.01 – 1.09

Date Received: May 10, 2011

Date Served: May 27, 2011

REQUEST NO. JLH 1.04:

In comparing ComEd's Responses to Staff DR JLH 1.01 and 1.02, please justify shifts across categories that are greater than 15%. For example, if planning TRC for Appliance Recycling is 1.35 and the ex post TRC is 3.97, please explain the largest drivers for this shift. Provide all supporting workpapers and documentation in unlocked spreadsheets and Microsoft Word, where applicable.

RESPONSE:

ComEd is unable to respond to this request as asked in the abbreviated time period requested by Staff. However, ComEd has asked and received clarification on specific areas of interest. This response will focus on two areas of interest – Portfolio Administration Costs and Marketing Costs.

For Portfolio Administration Costs, the attachment to ComEd's Response to Staff Data Request JLH 1.01 labeled as JLH 1.01_Attach 1 shows ComEd's Plan budget at \$3,990,000, while actual expenditures at \$2,359,625. However, this attachment asked for ComEd labor costs to be broken out by program, which ComEd only estimates for program cost-effectiveness analysis. Normally, ComEd allocates Rider EDA labor costs into the portfolio administration cost bucket. As shown in ComEd Ex. 1.0 of this docket (Annual Report to the Illinois Commerce Commission, page 3), the portfolio administration costs are listed at \$3,285,956. This number can be calculated from JLH 1.01_Attach 1, tab JLH 1.02 PY2Expenses worksheet as the total of the portfolio administration costs (\$2,359,625), the Total Residential Program cost – ComEd Labor Costs (\$428,297) and the Total C&I Program cost – ComEd Labor Costs (\$498,034). A comparison of the actual expenses of \$3,285,965 versus the planned expenses of \$3,990,000 shows a difference of \$704,035 or a 17% reduction in the Plan budget. ComEd believes this is primarily due to ComEd's management of the portfolio costs to keep costs as low as possible.

For the Marketing costs, it must be noted that for its Plan ComEd based its proposed Marketing costs on a percentage of the Incentive cost for the program. In ComEd Ex. 1.0 Appendix D, in ICC Docket No. 07-0540, each program's marketing cost is calculated as a percentage of the incentive costs. For example residential lighting shows PY2 marketing costs of \$1,860,000 which is 23% of the incentive costs, while Appliance Recycling shows PY2 marketing costs of \$740,000 which is 50% of the incentive costs. These costs were established for planning purposes. ComEd states in each program description in the Plan under the Estimated Budget category "The following budget has been used for planning purposes. However, ComEd reserves the right to adjust program budgets as necessary in accordance with current market conditions, EM&V results, and program implementation experience."

As ComEd further fleshed out the final design of the programs with the implementation contractors, the program designs were changed to meet the current market conditions, the knowledge obtained from PY1 and the expertise of the implementation contractors. Program managers were given the overall program budgets to work with, but were given the autonomy to best use the budget to achieve the individual program kWh goals while attempting to minimize costs. Comparing the individual program budget components (e.g., marketing costs) to the plan budget was not required of the program managers.

A good example of this is the C&I Prescriptive Rebate Program. ComEd realized that minimal marketing to customers was needed as the trade allies actively promoted the program for their own benefit. This resulted in ComEd only spending 18% of the marketing budget that was planned.

Also, the implementation contractors may have implemented marketing activities as they have a performance contract requiring them to achieve a kWh savings goal. Where possible, ComEd attempted to break out marketing costs, but this was not always possible, nor was it required reporting from the contractor.

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests
JLH 1.01 – 1.09
Date Received: May 10, 2011
Date Served: May 20, 2011**

REQUEST NO. JLH 1.09:

Please describe ComEd's marketing approach to the Appliance Recycling program in detail for PY2.

- (a) Please include all relevant documents and workpapers for this program, including but not limited to, marketing invoices, and documents justifying marketing approach, e-mails, targeted response rates, and targeted savings.
- (b) Please identify any similarities or changes from the approach taken in PY1 with respect to marketing the Appliance Recycling program and describe the successes and failures of each approach.

RESPONSE:

- (a) See the attachment labeled as JLH 1.09_Attach 01 for ComEd's PY2 Marketing Plan and Strategy for the *Smart Ideas for Your Home* program, which includes Appliance Recycling. This document focuses on the overall strategy for all residential programs, including key insights and observations for Appliance Recycling. This document, created in January 2009 prior to the June launch of the PY2 programs, was intended to be a living document throughout PY2. As PY2 progressed, ComEd modified its goals to reflect new information (e.g., evaluation report results), which impacted the Appliance Recycling program.

The overall marketing approach was to begin with the PY2 Marketing Plan and conduct weekly meetings to review enrollments (see JLH 1.09_Attach 02 for a CD-ROM containing same) and compare the results with the marketing tactics currently being implemented. Quarterly, ComEd and its implementation contractor, JACO Environmental, met to review program performance and discuss strategies and approaches for going forward. The attachments labeled as JLH 1.09_Attach 03, JLH 1.09_Attach 04, JLH 1.09_Attach 05, JLH 1.09_Attach 06, and JLH 1.09_Attach 07 contain the PY2 kick-off meeting and quarterly presentations.

The attachment labeled as JLH 1.09_Attach 08 outlines the quarterly marketing tactics per quarter for appliance recycling and the associated marketing spends. Please note that worksheet "Q4 tab" shows a total spend of \$674K which is a subset of the total marketing charges of \$680K.

The attachments labeled as JLH 1.09_Attach 09, JLH 1.09_Attach 10, JLH 1.09_Attach 11, JLH 1.09_Attach 12, and JLH 1.09_Attach 13 are additional documents that cover marketing for Appliance Recycling. The attachment labeled as JLH 1.09_Attach 14 contains the top five invoices for marketing Appliance Recycling.

- (b) For PY1, the final appliance recycling program metrics achieved were 11,979 total units recycled with a year-end marketing spend of \$422K. This equates to a marketing acquisition cost of approximately \$35.22/unit collected.

For PY2, the appliance recycling program achieved 25,735 units recycled, an increase of 113%, with a year-end marketing spend of \$680K. This equates to a marketing acquisition cost of approximately \$26.63/unit collected for PY2. ComEd realized a decrease in the marketing acquisition cost of over 24% from PY2 to PY1.

ComEd leveraged many lessons learned from the marketing tactics deployed in PY1 versus PY2. These lessons included tracking tactics that resonated well with our customer base and as well as tactics that did not resonate such as newspaper advertising. In addition, ComEd worked well with the agencies to leverage other planned marketing tactics with the other programs in the portfolio to decrease costs associated with the agencies associated with bulk printing, creative charges, and bill insertion rates.



An Exelon Company



PY2 Marketing Plan

January 5, 2009

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Executive Summary

This marketing plan is predicated upon two ultimate objectives:

O1: Make planned kWh and kW goals and in the process become a national leader in EEDR program design and implementation.

O2: Change entrenched energy-related perceptions *and behaviors* to help customers lower their energy costs, protect the environment and increase the value they receive from their energy dollars.

These two objectives are supported by five discrete marketing strategies:

S1. Establish a 1:1 strategy to better identify, segment and communicate with key customers

S2. Empower (and encourage) customers to take control of their energy usage through EE education

S3. Educate and leverage internal resources to their greatest potential

S4. Generate the highest level of awareness for ComEd as the trusted resource for EE information

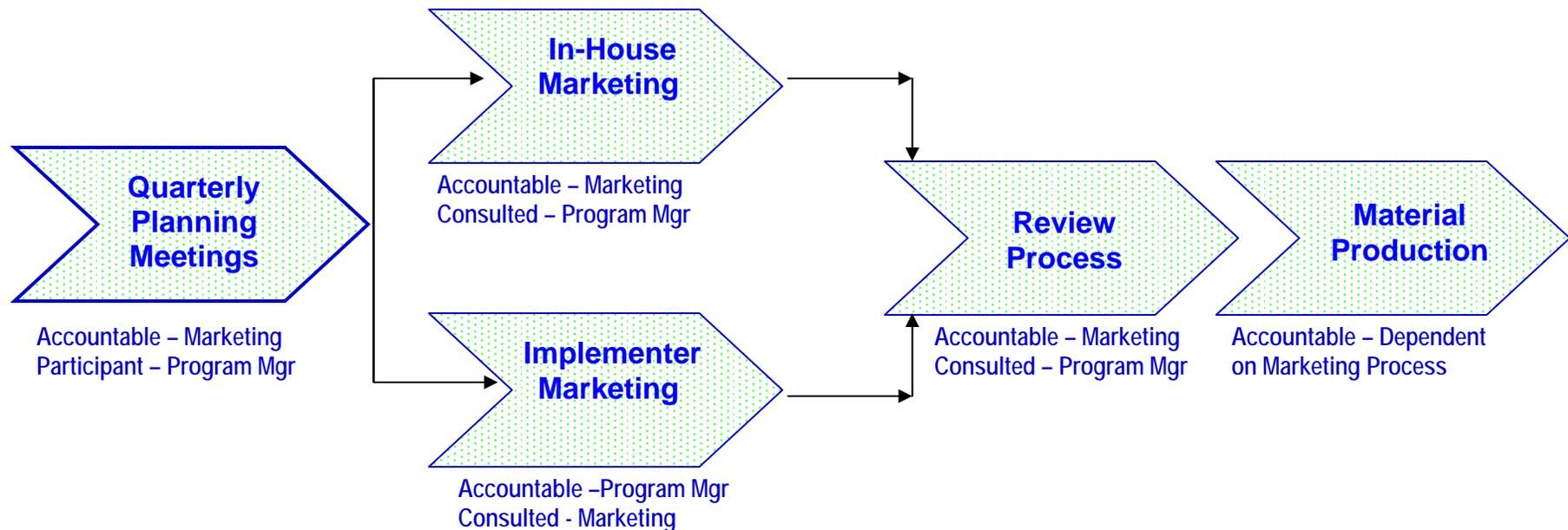
S5. Support ComEd & Exelon Corp initiatives for EE & carbon reduction

Each of these five strategies are realized through the implementation of individual tactics. In short, this plan provides clear line-of-sight between each tactic and the strategy(ies) and objective(s) it supports.

In broad strokes, by the end of PY2, this plan will have successfully:

- Achieved PY2 kWh and kW goals
- Personified the Smart Ideas program and “energy efficiency” by making the Energy Doctor synonymous with both
- Increased the use of cooperative advertising
- Encouraged new energy-usage behaviors in consumers
- Established linkage between EE activities and consumers’ abilities to positively impact climate change
- Used customer modeling and cross-selling to effectively and efficiently reach customer candidates for specific incentives

Marketing Management Process: In-House v Implementer



Quarterly Planning Meetings

Initiate the Process via individual quarterly meetings with the Incentive Program Manager (IPM).

Discuss:

- Tactics to be deployed in the following quarter
- Ownership of tactics (In-house with Marketing or Implementation Contractor with IPM)
- Remaining/upcoming tactics to ensure they're still strategically sound based on current conditions

In-house Marketing

Defined as tactics stewarded and developed under the auspices of ComEd's Marketing department. Includes: brochures, bill inserts, truck wraps, direct mail, web advertisement, collateral, vendors. Newspaper ads, radio, TV, billboards, and media buys will be stewarded by Corporate Communications and their Agency of Record.

Implementer Marketing

Defined as tactics stewarded and developed under the auspices of the Implementer (aka Implementation Contractor, or IC). Includes existing "off-the-shelf" materials or communications that the IC has had

experience implementing previously. May include but are not limited to: Brochures, POS displays and materials, co-operative advertising, bill inserts, direct mail, newspaper ads, radio, TV and billboards. Media buys will be stewarded by Corporate Communications and their Agency of Record.

Review Process

Regardless of whether marketing communication is stewarded in-house or via the implementation contractor, the Marketing lead will route materials for internal review and will be responsible for incorporating the comments/revisions if project is in-house; or forwarding them to the program manager, if the project is handled by the implementation contractor. In all instances, Marketing will be Corporate Communications' point-of-contact when Corp Comm is stewarding a project to completion.

Material Production

Steward of the tactic is ultimately responsible for ensuring comments/changes are incorporated and milestone date are met.

(NOTE: the following steps are not shown in the flowchart on previous page):

Evaluate Effectiveness of Tactics

Marketing will be responsible for documenting the tactic's implementation and evaluating its effectiveness.

General Marketing Implementation Process

General Marketing tactics will be managed in-house and discussed at the bi-weekly Marketing meetings. General Marketing are communications that present the Smart Ideas program in whole via brochures, bill inserts, truck wraps, direct mail, web advertisement or collateral. However, newspaper ads, radio, TV, billboards, and media buys will be stewarded by Corporate Communications and their Agency of Record.

Programs, PY2 Targets and Key Insights & Observations

Programs And PY2 KPIs	Lighting	Appliance Recycling	All Electric Energy Efficiency Upgrade	Advanced Lighting	SFH Performance Tune-Up	HVAC Diagnostics and Tune-Up	New HVAC with Quality Install	AC Cycling	RRTP
	4,333,296 Bulbs 126,349 MWh	30,946 Units 18,358 MWh	3,300 Units 2,369 MWh	64 Homes 125 MWh	1,981 All-Electric Homes / 1,407 MWh	6,500 Tune-ups 1,802 MWh	17,460 Units 7,227 MWh	8,249 Switches 7,695 Customers	6,000 New Customers
Key Insights & Observations	<ul style="list-style-type: none"> Lighting incentives are responsible for delivering the single, largest chunk of EE savings in the portfolio A robust retailer/co-op advertising program may provide results if sales slow Point of Purchase communications remain necessary to articulate the value/benefits of CFLs Presence of Mercury and disposal process may be an obstacle to purchase for some consumers ComEd research suggests customers are dubious about the quality of light provided by CFL's Price is becoming slightly less of a barrier 	<ul style="list-style-type: none"> PY1 unit collections lagged throughout the 12-month window; the doubling of goals for PY2 puts extra emphasis on finding the most effective and responsive communication channels and messaging Households that have participated in the program thru Dec 8, 2008, tend to skew older, and with higher incomes Anecdotal feedback suggests appointment scheduling may be an impediment; and Web appt interface not sufficiently convenient Bill stuffer roughly doubled 2008 weekly intake rate The incentive's "terms and eligibility" appear to be challenging customers' comprehension Care must be taken not to promote new appliance purchases, or else we risk increasing free ridership The implementation contractor prefers a slow-down during the Winter and Holiday months The recycling center is located in Lombard, Ill., enabling site visits and regional tests 	<ul style="list-style-type: none"> Communications should target Property Managers and Tenants (creating pull-through) Goals are identical to PY1's (and PY3's) 	<ul style="list-style-type: none"> With the current home market, we can partner with key builders who are looking to create differentiation Communications must target home builders and potential home buyers (creating pull-through) Buyers in these new homes will become a key target audience for this and other programs ComEd research revealed customers' desire for information from the company on energy consumption in their homes 	<ul style="list-style-type: none"> This is the "single family home" version of the All-Electric Energy Efficiency Upgrade for multi-family units There's an opportunity to amplify the Smart Ideas message via a complete home makeover ComEd customer data can provide us with names and addresses of homes that are eligible for this direct-install incentive Having the Energy Doctor perform a direct install in a customer's home could be a news worthy event 	<ul style="list-style-type: none"> Learnings from last August's RRTP AC Tune-Up offering may be relevant here Incentive will be "marketed thru" ComEd-approved HVAC contractor 100-200 trades people (trained by IC) indicates potential for solid start Communications should ultimately include a referral component to the New HVAC w/ Quality Install program if a tune-up is insufficient All marketing activities may be developed and executed by the chosen Implementation Contractor (with ComEd oversight/approval) "Sharing" communications tactics with New HVAC with Quality Install incentive may be a good idea 	<ul style="list-style-type: none"> Incentive will be "marketed thru" ComEd-approved HVAC contractor Need to educate customers on the benefits of using a Smart Ideas-branded installer because customers may only receive incentive if they work with one "right from the start" May be compelling to gather data that depicts the savings delta between a correctly and incorrectly installed unit Suitable customer candidates might be able to be ID'd via their summer bills All marketing activities may be developed and executed by the chosen Implementation Contractor (with ComEd oversight / approval) "Sharing" communications tactics with HVAC Diagnostics incentive may be a good idea 	<ul style="list-style-type: none"> Existing LOGIT model can be leveraged to identify HVAC Diagnostics and Tune-Up and Quality Install incentive candidates Broadcast media or print may be a better communications channel this year (than direct mail) 	<ul style="list-style-type: none"> The existence of an in-home energy price monitor would make this program a more compelling value proposition (NOTE: Home Area Network under development) Co-marketing with Load Guard should be explored Current RRTP participants are not realizing the savings they once did (due to recent energy price increases) There are marketing relationships with Converge and CNT that must be accommodated Consider creating new "Automated Energy Management" offering that combines RRTP, Central AC Cycling and Load Guard into a single value proposition

Strategies and Tactics

(Strategies are prioritized by importance; Tactics are shown under the Strategy they single-most predominantly support)

<p>S1. Establish a 1:1 strategy to better identify, segment and communicate with key customers</p>	<p>S2. Empower (and encourage) customers to take control of their energy usage through EE education</p>	<p>S3. Educate and leverage internal resources to their greatest potential</p>	<p>S4. Generate the highest level of awareness for ComEd as the trusted resource for EE information</p>	<p>S5. Support ComEd & Exelon Corp initiatives for EE & carbon reduction</p>
<ol style="list-style-type: none"> 1. Utilize customer info from past submitted Energy Doctor e-mail questions to send targeted incentive info to customers 2. Develop "invitation from the Doctor" to gain permission to communicate using existing customer e-mails 3. Utilize iContact, Vertical Response (or similar) to conduct targeted e-mail campaign to customer e-mail lists 4. Modify Web-based assets to capture consensual communications info in real-time 5. Capture customer contact information at all outreach events in anticipation of building a consensual database that tracks participation levels, touch points, preferences and other 1:1 data 6. Utilize EFI online, ED email submissions and home energy audit customer contact info to build consensual database and send targeted communications about program incentives 7. Use modeling to predictively target customers (e.g., homes with older units/and green as contingency for HVAC D&T) 8. Direct mail to predictively modeled, or rate class, customers 9. Tenant postcard outreach campaign 10. Utilize Central AC Cycling HH info to identify prospects; conduct DM campaign that provides Trade Ally info to prospects 11. Develop Spanish versions (with possibly new messaging) 12. Direct Mail campaign with incentive offer 13. Conduct regional focus groups to identify customer segments/models for various incentives (if necessary) 14. Leverage Community Energy Challenge activities (TBD) 15. 	<ol style="list-style-type: none"> 1. Redesign the Smart Ideas Web pages to make info easy to find 2. Energy@Home Story 3. Keep job aids, print collateral and needs finders updated and readily available via SharePoint site 4. Develop updated Showcase of Homes-type case studies 5. Energy Doctor Educational Tour with Hybrid Bus (on hold) 6. Augment CTW Pledge drive with Giveaway event to drive pledges and general EE behavioral changes 7. Tie into ENERGYSTAR'S Change the World campaign (Press Releases, Web content, Web pledge page) 8. Create community energy efficiency fund to provide grants to non-profits for EE-related projects (on hold) 9. Update collateral/brochures/flyers 10. Augment CTW Pledge drive with Giveaway event to drive pledges and general EE behavioral changes 11. Continue Positive Energy mailings to customers to help them quantify their energy usage 12. Conduct in-store lighting demos 	<ol style="list-style-type: none"> 1. Provide appropriate call scripting or equivalent to Call Center personnel; include cross-selling scripting 2. Equip field trucks and crews with EE information for distribution (ie: printed materials, door hangers, etc). 3. Synergize all existing customer communication vehicles (e.g., E@H, bill statement, Web site and eBill payment environment) 4. Develop retail handout/door hanger/meter hanger for distribution by employees, crews, our CFL retail partners 5. Utilize External Affairs Managers to get word of incentive out to Municipalities (via community newsletters) 6. Utilize Ext Affairs to identify and approach owner/operators of all-electric tenements 7. Work with John Egan and Carrie Connolly to reach out to builders/developers with incentive and value proposition (1-on-1 meetings) 8. Provide door hangers and other leave-behinds to Good Cents techs as they conduct routine maintenance/inspection of CACC switches 	<ol style="list-style-type: none"> 1. Integrate the Energy Doctor cartoon into all communications, sub-brand logos, Web and print material (be watchful of "logo clutter") 2. Create an "Ask the Energy Doctor" column for E@H and on the Web 3. Purchase banner/sponsor ads for Web search results 4. Bill Insert (Buckslip) 5. Bill Message 6. Outer Carrier Envelope 7. Conduct regional newspaper advertisements 8. Promote Smart Ideas in consumer publications; regularly pitch Smart Ideas / EEDR story ideas 9. Distribute existing SI/ED-branded tchotchkes at outreach events 10. Explore PTA partnership opportunities to elevate school/community outreach 11. Create vehicle window clings for ComEd employees' autos and Company vehicles 12. Modify on-hold messaging to promote EE tips and Smart Ideas incentives 13. Offer retailers and trade allies co-operative advertising dollars for newspaper advertising 14. Create Exelon West employee pledge program around CTW and make it competitive with rewards 15. Blast e-mail customers in consensual database to remind them to pledge for CTW event 16. Penny Saver ads 17. Google ads 18. Point of sale displays at appliance retailers 19. Create poster for building managers 20. Use door hangers to spread the word within buildings 21. Partner with one or two prominent area homebuilders 22. Utilize Energy Essentials (Builder Developer Edition) to Drive Awareness 23. Create handouts for homebuilder's (s') information packets (dist to those who visit the sales center) 24. Place POS "coupon/flyer" at retail partners' furnace filter products to alert shopper to offer and participating trade allies 	<ol style="list-style-type: none"> 1. Continue inclusion of Exelon 2020 Seal into Smart Ideas communications and materials, when appropriate. 2. Establish small portion of Smart Ideas Web pages to display the "bigger corporate picture" regarding Climate Change and how Smart Ideas is a part of it

Market Research

Short-Term

Segmenting our entire customer population was considered an unnecessary initial step due to the exhaustive amount of resources it would entail and its disconnection with the usefulness of actually categorizing our current customers.

Instead, initially, we plan to only profile the average participant in the Appliance Recycling and Central AC Cycling incentives and leverage their profile parameters to seek out additional prospects for the **Appliance Recycling**, and **New HVAC** and **HVAC Tune-Up** incentive programs, respectively.

In late November, Marketing supplied our in-house Market Research department with customer info on 4,000+ participants in the Appliance Recycling incentive. Market Research returned a list of communities each with a Market Potential Index (MPI) based on past participant demo- and psychographic information.

Selecting those communities with an MPI greater than or equal to 150, *and* with a household population of 9,200 or greater identified seven communities (see text box) – all of which seemingly have a reputation for skewing older and affluent. There are approximately 50,000 potentially eligible households in these seven communities.

Northbrook Park Ridge Wilmette Highland Park Barrington Deerfield New Lenox

Marketing recommends targeting all but New Lenox (which is far south) in a phase two approach that utilizes direct mail to reach the approximately 45,000 remaining households in March/April '09. This phase two tactic would only be utilized if the January '09 newspaper and bill insert buckslip tactics fall short of generating anticipated appliance recycling enrollments. This phase two activity would also coincide with a March bill insert buckslip promoting the program.

Marketing also has a detailed research study that predictively models existing Central AC Cycling participants. Working with our Market Research department, we will consider how this model can be leveraged to identify potential prospects and reach them with the most effective communications channel.

Potential candidates for the following incentive programs can be divined using customer billing information and do not require extraordinary segmentation effort at this time:

- **Advanced Lighting**
- **All-Electric Energy Efficiency Upgrade**
- **Single Family All-Electric Performance Tune-Up**

The **ENERGY STAR® Lighting** incentive is expected to remain robust through PY2 and will not require customer segmentation activities at this time either.

Long-Term

In the longer term, we expect to establish customer profiles and customer counts for all Smart Ideas incentives and for those programs that have been recently added into the Smart Ideas portfolio (ie: RRTP and Smart Returns) by June 2009. This information will be utilized by Marketing and by the Implementation Contractors on an as-needed basis.

Additionally, we believe customer focus groups may be required later in the Program Year. We are keeping Mike Brandt informed of our research intentions, and we are anticipating the research contributions his group will provide to augment our own activities.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests
JLH 2.01 – 2.03
Date Received: May 25, 2011
Date Served: June 3, 2011**

REQUEST NO. JLH 2.01:

Please refer to the document, "JLH 1 01_Attach 1.pdf" provided by ComEd in its Response to Staff Data Requests JLH-1.01-1.02 when answering the questions below.

- (a) Footnote 2 on page 2 of the above referenced document states: "(2) - "Total ComEd Labor Costs" only reflects Labor Costs associated with Rider EDA employees (i.e., non-Rider employee costs are not included)" Please precisely define and provide ten examples of the "non-Rider employee costs" referenced.
- (b) Are the "non-Rider employee costs", which are referenced in part (a) of this question, budgeted for in the "TOTAL Budgeted Costs" Column (f) presented on page 1 of the above referenced document?
- (c) Are the "non-Rider employee costs", which are referenced in part (a) of this question, taken into account at all regarding any calculations necessary to determine the numbers presented on page 1 of the above referenced document?
- (d) Does ComEd include these "non-Rider employee costs", which are referenced in part (a) of this question, when calculating its annual energy efficiency spending pursuant to 220 ILCS 5/8-103(d)?

RESPONSE:

- (a) "Non-Rider employee costs" are the total employee costs (i.e., including fringe benefits) associated with employees who work within ComEd's Marketing & Environmental Program area and work on ComEd's energy efficiency portfolio, but are not incremental positions paid for under Rider EDA. ComEd is unclear as to what "ten examples" of these costs would be as they are total employee costs.
- (b) No.
- (c) No.
- (d) No.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 2.01 – 2.03

Date Received: May 25, 2011

Date Served: June 3, 2011

REQUEST NO. JLH 2.03:

Please refer to the attachment to this data request labeled "Staff DR JLH 2 Attach 1.pdf" when answering the questions below.

- (a) Compare the line items of Column (g) on page 3 with the line items of Column (g) of page 7. Please thoroughly explain the fluctuations.
- (b) Compare the line items of Column (e) on page 3 with the line items of Column (e) of page 7. Please thoroughly explain the fluctuations.
- (c) Compare Column (e) on page 3 with Column (g) of page 7. Does a relationship exist between the costs presented in these columns? Please thoroughly explain.
- (d) Provide all supporting workpapers and documentation in unlocked spreadsheets or Microsoft Word, where applicable.



Staff DR JLH 2_
Attach 1.pdf

RESPONSE:

- (a) ComEd has not attempted to conduct any analysis of employee time (and therefore labor costs) spent on programs in PY1 versus PY2 for non-Rider EDA employees. ComEd can state that any fluctuation for any program is the difference in employee time spent on the program from one year to another and whether the employee(s) was paid for within the Rider or outside the Rider.
- (b) ComEd has not attempted to conduct any analysis of employee time (and therefore labor costs) spent on programs in PY1 versus PY2 for Rider EDA employees. ComEd can state that any fluctuation for any program is the difference in employee time spent on the program from one year to another and whether the employee(s) was paid for within the Rider or outside the Rider.
- (c) No.
- (d) N/A.

ICC Docket No. 10-0520**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests****JLH 1.01 – 1.05****Date Received: January 31, 2011****Date Served: February 14, 2011****REQUEST NO. JLH 1.05:**

With reference to Table E-2, Portfolio Year 2 Results – Ex Ante and Ex Post Savings on page 3 of the “Energy Efficiency / Demand Response Plan: Plan Year 2 (6/1/2009-5/31/2010): Evaluation Report: Summary Report” available online,¹ please provide this table in an unlocked Excel spreadsheet with working formulas for the additional data requested for each program element and/or measure category listed below, where applicable:

- (a) For each program element (column (1) of Table E-2), please provide the breakdown by measure category for those that used an individual NTG ratio to calculate net savings.
- (b) Please include a column labeled “NTG Ratio Source” and indicate for each program element/measure category whether the NTG ratio used in the net energy savings calculation was calculated using specific data from the ComEd service territory. If yes, indicate the number of observations used in NTG ratio calculation and the name of the survey instrument.
- (c) Please include a column labeled “RR Explanation” and provide an explanation of the main source of the realization rate (“RR”).
- (d) Please include the following additional columns with the associated data listed for each program element and/or measure category: Free-Ridership, Spillover, Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), TRC Test Results (without administrative cost allocation), Electric Only Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), Electric Only TRC Test Results (without administrative cost allocation), Utility Cost Test Results (with administrative cost allocation), Utility Cost Test Results (without administrative cost allocation), Net Savings (%)², Gross Savings (%), Lifecycle \$/kWh, First Year \$/kWh, Average Incentive Per Unit/Measure, Median Incentive Level Per Unit/Measure, Total # of Units/Participation, Average Incremental Measure Cost, Average Gross Annual kWh per Measure, Total Incentive Expenses (\$ & %), Total Non-Incentive Expenses (\$ & %), Non-Incentive Expenses (\$ & %) broken out by the following categories: Marketing; ComEd – labor; ComEd – software, ComEd – other; Program Implementer; and Evaluation.

RESPONSE:

The PY2 evaluations were conducted entirely by the independent evaluation team, led by Navigant Consulting. Therefore, ComEd does not have the information requested to fully answer this request. Specifically, ComEd does not have an unlocked, Excel version of Table E-2, Portfolio Year 2 Results as requested. The requests in subparts (a), (b), (c), and portions of (d) (i.e., Free-Ridership, Spillover, Net Savings %, Gross Savings %, Average Gross Annual kWh per Measure) are elements of the evaluation conducted by Navigant Consulting. ComEd respectfully suggests that Navigant is the appropriate source for this information.

ComEd can provide certain of the other aspects of subpart (d), based on its own tracking and performance measurements. The TRC results, provided at program levels, only reflect those administrative costs ComEd can reasonably allocate at the program level (e.g., program manager costs). All administrative costs are included in the Portfolio values.

The attached spreadsheet (JLH 1.05_Attach 1) provides the information ComEd has available in response to portions of subpart (d). These spreadsheets provide the following requested information: Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), Electric Only Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), Utility Cost Test Results (with administrative cost allocation), Lifecycle \$/kWh, First Year \$/kWh, Total Incentive Expenses (\$ and %), Total Non-Incentive Expenses (\$ and %), Non-Incentive Expenses (\$ and %) broken out by the following categories: Marketing; ComEd – labor; ComEd – software, ComEd – other; Program Implementer; and Evaluation. Given the total dollar values provided, percentages can be readily calculated on whatever basis the Staff prefers.

The following information requests were not provided because ComEd does not currently have the information as requested: TRC Test Results (without administrative cost allocation), Electric Only TRC Test Results (without administrative cost allocation), Utility Cost Test Results (without administrative cost allocation). ComEd has only run TRC analysis with its administrative cost allocations.

ComEd is unsure of the definitions of the following requested information and would like clarification before attempting to supply it: Average Incentive Per Unit/Measure, Median Incentive Level Per Unit/Measure, Total # of Units/Participation, Average Incremental Measure Cost, Average Gross Annual kWh per Measure. These requests resemble different forms of TRC inputs. ComEd inputs its TRC cost data as program totals versus per unit/measure, and these inputs are in the “PY2 Costs” worksheet of the attached Excel file (JLH 1.05_Attach 1).

² % may represent the following, as applicable: % of total portfolio, % of business portfolio, % of residential portfolio, % of program element.

¹ http://ilsag.org/yahoo_site_admin/assets/docs/ComEd_Summary_PY2_Evaluation_Report_2010-12-Final.12113204.pdf

ComEd Program Year 2 TRC Comparisons

	TRC with ComEd Admin Costs*	Electric Only TRC with ComEd Admin Costs*	Utility Cost Test with ComEd Admin Costs*
RESIDENTIAL EE PROGRAMS			
Residential Lighting	5.84	5.84	5.64
Appliance Recycling	3.97	3.97	2.56
Multi-family All-electric Sweep	2.50	2.50	0.68
Single Family Home Performance	0.95	0.95	0.40
CACES	0.33	0.33	0.29
Central Air Conditioning Cycling	3.73	3.73	1.78
C&I EE PROGRAMS			
C&I Prescriptive	2.67	2.67	5.67
C&I Custom	1.82	1.82	2.32
C&I Retrocommissioning	1.41	1.41	0.52
C&I New Construction	0.87	0.87	0.79
Portfolio Totals	2.84	2.84	3.62

* ComEd Admin Costs include Rider & Non-Rider labor allocated to each program per table on "PY2 Costs" Worksheet

ICC Docket No. 10-0520**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests****JLH 2.01 – 2.03****Date Received: January 31, 2011****Date Served: February 28, 2011****REQUEST NO. JLH 2.03:**

Please refer to Table 2. Portfolio Year 1 Results – Ex Ante and Ex Post Savings on page 2 of the “Energy Efficiency / Demand Response Plan: Plan Year¹ (6/1/2008-5/31/2009): Evaluation Report: Summary Report” available online.² Please provide this table in an unlocked excel spreadsheet with working formulas for the additional data requested for each program element and/or measure category listed below, where applicable:

- (a) For each program element (column (1) of Table 2), please provide the breakdown by measure category for those that used an individual NTG ratio to calculate net savings.
- (b) Include a column labeled “NTG Ratio Source” and indicate for each program element/measure category whether the NTG ratio used in the net energy savings calculation was calculated using specific data from the ComEd service territory. If yes, indicate the number of observations used in NTG ratio calculation and the name of the survey instrument.
- (c) Include a column labeled “RR Explanation” and provide an explanation of the main source of the realization rate (“RR”).
- (d) Include the following additional columns with the associated data listed for each program element and/or measure category: Free-Ridership, Spillover, Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), TRC Test Results (without administrative cost allocation), Utility Cost Test Results (with administrative cost allocation), Utility Cost Test Results (without administrative cost allocation), Net Savings (%)³, Gross Savings (%), Lifecycle \$/kWh, First Year \$/kWh, Average Incentive Per Unit/Measure, Median Incentive Level Per Unit/Measure, Total # of Units/Participation, Average Incremental Measure Cost, Average Gross Annual kWh per Measure, Total Incentive Expenses (\$ & %), Total Non-Incentive Expenses (\$ & %), Non-Incentive Expenses (\$ & %) broken out by the following categories: Marketing; ComEd – labor; ComEd – software, ComEd – other; Program Implementer; and Evaluation.

RESPONSE:

The PY1 evaluations were conducted entirely by the independent evaluation team, led by Navigant Consulting. Therefore, ComEd does not have the information requested to fully answer this request. Specifically, ComEd does not have an unlocked, Excel version of Table E-2, Portfolio Year 1 Results as requested. The requests in subparts (a), (b), (c), and portions of (d) (i.e., Free-Ridership, Spillover, Net Savings %, Gross Savings %, Average Gross Annual kWh per Measure) are elements of the evaluation conducted by Navigant Consulting. ComEd respectfully suggests that Navigant is the appropriate source for this information.

ComEd can provide certain of the other aspects of subpart (d), based on its own tracking and performance measurements. The TRC results, provided at program levels, only reflect those administrative costs ComEd can reasonably allocate at the program level (e.g., program manager costs). All administrative costs are included in the Portfolio values.

The attached spreadsheet (JLH 2.03_Attach 1) provides the information ComEd has available in response to portions of subpart (d). These spreadsheets provide the following requested information: Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), Electric Only Total Resource Cost (“TRC”) Test Results (with administrative cost allocation), Utility Cost Test Results (with administrative cost allocation), Lifecycle \$/kWh, First Year \$/kWh, Total Incentive Expenses (\$ and %), Total Non-Incentive Expenses (\$ and %), Non-Incentive Expenses (\$ and %) broken out by the following categories: Marketing; ComEd – labor; ComEd – software, ComEd – other; Program Implementer; and Evaluation. Given the total dollar values provided, percentages can be readily calculated on whatever basis the Staff prefers.

Information for the following requests was not provided because ComEd does not currently have the information as requested: TRC Test Results (without administrative cost allocation), Electric Only TRC Test Results (without administrative cost allocation), Utility Cost Test Results (without administrative cost allocation). ComEd has only run TRC analysis with its administrative cost allocations.

ComEd is unsure of the definitions of the following requested information and would like clarification before attempting to supply it: Average Incentive Per Unit/Measure, Median Incentive Level Per Unit/Measure, Total # of Units/Participation, Average Incremental Measure Cost, Average Gross Annual kWh per Measure. These requests resemble different forms of TRC inputs. ComEd inputs its TRC cost data as program totals versus per unit/measure, and these inputs are in the “PY1 Costs” worksheet of the attached Excel file (JLH 2.03_Attach 1).

1 PY 1 data is requested to verify any “banked” savings.

2 http://ilsag.org/yahoo_site_admin/assets/docs/ComEd_Summary_Evaluation_Report_Year_1_2009-12-23.6173111.docx

3 % may represent the following, as applicable: % of total portfolio, % of business portfolio, % of residential portfolio, % of program element.

Program Year 1 Expenses

Rider EDA Expenses							ComEd Labor Non-Rider EDA Expense	Total Portfolio Expenses	Ex Post Savings	Net (MWH)	Average Year costs (\$/kWh)	1st Levelized Lifecycle costs (\$/kWh)
Contractor Costs	Incentive Costs	Marketing Costs	TOTAL Non-Labor Costs	ComEd Labor	TOTAL Rider EDA Expenses							
a	b	c	b a+b+c	e	f d+e	g	h f+g	i	j	k		
RESIDENTIAL EE PROGRAM COSTS												
Residential lighting	\$ 1,879,027.34	\$ 3,240,496.84	\$ 147,616.62	\$ 5,267,140.80	\$ 252,850.54	\$ 5,519,991.34	\$ 15,501.01	\$ 5,535,492.35	60,789	\$ 0.091	\$ 0.014	
Appliance recycling	\$ 1,301,348.30	\$ 297,475.00	\$ 422,301.66	\$ 2,021,124.96	\$ 92,767.45	\$ 2,113,892.41	\$ 192,399.02	\$ 2,306,291.44	11,478	\$ 0.201	\$ 0.032	
Multi-family all-electric sweep	\$ 222,475.59	\$ 411,494.25	\$ 19,439.91	\$ 653,409.75	\$ 53,995.69	\$ 707,405.44	\$ 95,891.97	\$ 803,297.41	1,852	\$ 0.434	\$ 0.062	
CACES	\$ 369,640.00	\$ -	\$ 38,629.85	\$ 408,269.85	\$ 59,081.92	\$ 467,351.77	\$ 105,487.84	\$ 572,839.61		NA	NA	
Total Residential Programs	\$ 3,772,491.23	\$ 3,949,466.09	\$ 627,988.04	\$ 8,349,945.36	\$ 458,695.60	\$ 8,808,640.96	\$ 409,279.84	\$ 9,217,920.80	74,119	\$ 0.124	\$ 0.019	
C&I EE PROGRAM COSTS												
C&I Prescriptive	\$ 2,120,927.77	\$ 6,201,030.16	\$ 50,960.91	\$ 8,372,918.84	\$ 282,651.04	\$ 8,655,569.88	\$ 153,275.42	\$ 8,808,845.30	80,932	\$ 0.109	\$ 0.013	
C&I Custom	\$ 530,232.49	\$ 1,550,257.64	\$ 12,836.36	\$ 2,093,326.49	\$ 70,662.76	\$ 2,163,989.25	\$ 38,318.85	\$ 2,202,308.11	4,761	\$ 0.463	\$ 0.050	
C&I Retrocommissioning	\$ 201,454.92	\$ 213,360.00	\$ 1,441.50	\$ 416,256.42	\$ 76,263.76	\$ 492,520.18	\$ 28,423.01	\$ 520,943.18	1,090	\$ 0.478	\$ 0.111	
Small C&I CFL Intro Kit	\$ 300,148.76	\$ 309,271.55	\$ 1,000.00	\$ 610,420.31	\$ 71,050.24	\$ 681,470.55	\$ 20,067.84	\$ 701,538.39	2,815	\$ 0.249	\$ 0.066	
C&I New Construction	\$ 100,000.00	\$ -	\$ -	\$ 100,000.00	\$ -	\$ 100,000.00	\$ -	\$ 100,000.00		NA	NA	
Total C&I Programs	\$ 3,252,763.94	\$ 8,273,919.35	\$ 66,238.77	\$ 11,592,922.06	\$ 500,627.80	\$ 12,093,549.86	\$ 240,085.12	\$ 12,333,634.98	89,598	\$ 0.138	\$ 0.017	
OTHER COSTS												
Demand Response	\$ -	\$ -	\$ 476,027.70	\$ 476,027.70	\$ -	\$ 476,027.70	\$ 87,793.28	\$ 563,820.98				
DCEO	\$ 6,949,809.14	\$ -	\$ -	\$ 6,949,809.14	\$ -	\$ 6,949,809.14	\$ -	\$ 6,949,809.14				
OTHER PORTFOLIO COSTS												
Other Portfolio Costs:												
EIO / Energy Star	\$ 477,763.75		\$ 13,658.91	\$ 491,422.66		\$ 491,422.66		\$ 491,422.66				
Eduational Outreach	\$ 423,378.47		\$ 770,505.42	\$ 1,193,883.89		\$ 1,193,883.89		\$ 1,193,883.89				
R&D / Emerging Technologies	\$ 627,286.58		\$ 980.00	\$ 628,266.58		\$ 628,266.58		\$ 628,266.58				
Portfolio Administration	\$ 1,466,879.15			\$ 1,466,879.15	\$ 997,479.65	\$ 2,464,358.80	\$ 693,470.24	\$ 3,157,829.04				
Measurement & Verification	\$ 1,200,000.00			\$ 1,200,000.00		\$ 1,200,000.00		\$ 1,200,000.00				
Other Portfolio Subtotal	\$ 4,195,307.95	\$ -	\$ 785,144.33	\$ 4,980,452.28	\$ 997,479.65	\$ 5,977,931.93	\$ 693,470.24	\$ 6,671,402.17				
Total Other	\$ 11,145,117.09	\$ -	\$ 1,261,172.03	\$ 12,406,289.12	\$ 997,479.65	\$ 13,403,768.77	\$ 781,263.52	\$ 14,185,032.29				
Total Portfolio Costs	\$ 18,170,372.26	\$ 12,223,385.44	\$ 1,955,398.84	\$ 32,349,156.54	\$ 1,956,803.05	\$ 34,305,959.59	\$ 1,430,628.48	\$ 35,736,588.07				
Total Portfolio Costs- Comed Only	\$ 11,220,563.12	\$ 12,223,385.44	\$ 1,955,398.84	\$ 25,399,347.40	\$ 1,956,803.05	\$ 27,356,150.45	\$ 1,430,628.48	\$ 28,786,778.93	163,717	\$ 0.176	\$ 0.024	

ICC Docket No. 10-0520
JLH 2.03_Attach 1
PY1 TRC

ComEd Program Year 2 TRC Comparisons

	TRC with ComEd Admin Costs*	Electric Only TRC with ComEd Admin Costs*	Utility Cost Test with ComEd Admin Costs*
RESIDENTIAL EE PROGRAMS			
Residential Lighting	3.77	3.77	4.95
Appliance Recycling	2.58	2.58	2.24
Multi-family All-electric Sweep	1.89	1.89	0.92
Central Air Conditioning Cycling	3.33	3.33	2.37
C&I EE PROGRAMS			
C&I Prescriptive	2.43	2.43	3.09
C&I Custom	1.29	1.29	1.29
C&I Retrocommissioning	0.79	0.79	0.55
Small C&I CFL Intro Kit	1.88	1.88	1.05
Portfolio Totals	2.14	2.14	2.31

* ComEd Admin Costs include Rider & Non-Rider labor allocated to each program per table on "PY1 Costs" Worksheet

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 17, 2011

REQUEST NO. JLH 3.01:

In Docket No. 07-0540, the Commission concluded that the relative share of funds assigned to specific sectors (residential, commercial, and industrial¹) should remain approximately proportionate to the proposed levels in the plan. (Docket No. 07-0540, Final Order at 35). Please demonstrate that ComEd has complied with this directive for PY2 and provide all supporting documents, including the original sector allocation approved.²

¹ (Docket No. 07-0540, ELPC Ex 1.0 at 5).

² In Docket No. 10-0570, the Commission concluded that "with respect to the proposal by the AG and NRDC that ComEd should obtain regulatory approval before moving more than 10% of ComEd's portion of total portfolio spending from residential to C&I programs (or vice versa), the Commission agrees with ComEd that such review already occurs as part of the annual reconciliation proceedings required by the statute and tariff. As a result, this docket is not the proper proceeding to address such concerns." (Docket No. 10-0570, Final Order at 37-38).

RESPONSE:

ComEd objects to this request because it is vague and ambiguous, mischaracterizes the customer segments from which Rider EDA collects funds, mischaracterizes applicable law and Commission Orders, and to the extent it calls for a legal conclusion. Without waiving these objections or any of its General Objections, ComEd states as follows.

As an initial matter, footnote 2 of this Request appears to reflect a misunderstanding of the operation of Rider EDA and how it allocates funds. Although footnote 2 correctly notes that "the Commission agrees with ComEd that such review already occurs as part of the annual reconciliation proceedings required by the statute and tariff", footnote 2 omits the key description of this review. Specifically, ComEd explained that "[b]ecause Rider EDA allocates costs by customer class (residential, small C&I and large C&I), any reallocations will be disclosed and explained in such proceedings." Although ComEd has already fully explained in this docket how Rider EDA allocated costs by customer class during Plan Year 2 (*see* Brandt Dir., ComEd Ex. 2.0, at 18-24), ComEd has set forth below a detailed description of how costs are allocated under Rider EDA.

¹ (Docket No. 07-0540, ELPC Ex 1.0 at 5).

² In Docket No. 10-0570, the Commission concluded that "with respect to the proposal by the AG and NRDC that ComEd should obtain regulatory approval before moving more than 10% of ComEd's portion of total portfolio spending from residential to C&I programs (or vice versa), the Commission agrees with ComEd that such review already occurs as part of the annual reconciliation proceedings required by the statute and tariff. As a result, this docket is not the proper proceeding to address such concerns." (Docket No. 10-0570, Final Order at 37-38).

In its Final Order in ICC Docket No. 07-0540 the Commission adopted the Illinois Industrial Energy Consumers' ("IIEC") proposal to impose "separate cost-recovery mechanisms for three different customer classes, which are 1) residential, 2) small commercial and industrial and 3) large commercial and industrial." *Commonwealth Edison Co.*, ICC Docket No. 07-0540, Final Order (Feb. 6, 2008), at 36, 38. As a result, the tariff mechanism itself "re-distributes the funds that have been collected." *Id.* at 38. Because ComEd had proposed a single, cents per kilowatthour charge applicable to all retail customers, no "original sector allocation" was proposed or approved apart from the "separate cost-recovery mechanisms for [the] three customer classes."

Consistent with the Commission's Final Order, Rider EDA segments its charges into three customer segments – (1) residential, (2) small commercial & industrial, (3) large commercial and industrial. For each customer segment, Rider EDA has a separate rate charge. For PY2, beginning in the June 2009 Monthly Billing Period, the Rider EDA rates were as follows: (1) Residential ("EDA-R") = 0.089 ¢/kWh, (2) Small Commercial & Industrial ("EDA-NS") = 0.073 ¢/kWh, and (3) Large Commercial & Industrial ("EDA-NL") = 0.090 ¢/kWh.

To comply with the Commission's directive to allocate costs across three customer segments, ComEd's process involves several stepover the course of the year. For PY2, the first step was the informational filing with the Commission that was filed on May 20, 2009. This filing sets up the new Rider EDA charges for PY2, taking into account the increase in spending screen and the projected expenditures by customer class. Attachment A-4 of this informational filing details the allocation of costs across customer classes with the notes explaining the methodology used to allocate the costs across the three customer segments. In addition, this filing also includes an Automatic Reconciliation Factor ("ARF") which adjusts Rider EDA based on how the projected PY1 expenses align with projected PY1 revenues. For PY1, \$3.8 million of over-collection was expected, so the projected PY2 Rider EDA revenue was reduced by the same amount.

In August 2009, ComEd filed its "Annual Report to the Illinois Commerce Commission Concerning the Operation of Rider EDA – Energy Efficiency and Demand Response Adjustment for the period beginning June 1, 2008 and extending through May 31, 2009" ("PY1 Annual Report"). In this filing, ComEd reconciled the final PY1 expenses, including all start-up costs, with the final PY1 revenues. The reconciliation found only a \$100,000 adjustment was required from the informational filing. As this adjustment was 0.1% of the overall spending screen of \$79 million, no additional adjustment to the Rider EDA charge was deemed necessary at this time.

In February 2010, the Uncollectible Factor ("UF") was set to 1.0 because of a change in a Commission order, which resulted in a change in Rider EDA charges. Effective with the April 2010 billing cycle the Rider EDA rates were as follows: (1) Residential ("EDA-R") = 0.088 ¢/kWh, (2) Small Commercial & Industrial ("EDA-NS") = 0.073 ¢/kWh, and (3) Large Commercial & Industrial ("EDA-NL") = 0.089 ¢/kWh.

Similar to the previous May, on May 20th, 2010, ComEd filed its PY3 Informational filing. This filing sets up the new Rider EDA charges for PY3, taking into account the increase in spending screen and the projected expenditures by customer class. Attachment A-4 of this informational filing details the allocation of costs across customer classes with the notes explaining the methodology used to allocate the costs across the three customer segments. In addition, this filing also includes an Automatic Reconciliation Factor (“ARF”), which adjusted Rider EDA based on how the projected PY2 expenses align with projected PY2 revenues. For PY2, \$4.0 million of over-collection was expected, so the projected PY3 Rider EDA revenue was reduced by the same amount. Effective with the June 2010 billing cycle, the Rider EDA rates were as follows: (1) Residential (“EDA-R”) = 0.147 ¢/kWh, (2) Small Commercial & Industrial (“EDA-NS”) = 0.127 ¢/kWh, and (3) Large Commercial & Industrial (“EDA-NL”) = 0.114 ¢/kWh.

In August 2010, ComEd filed its “Annual Report to the Illinois Commerce Commission Concerning the Operation of Rider EDA – Energy Efficiency and Demand Response Adjustment for the period beginning June 1, 2009 and extending through May 2010” (“PY2 Annual Report”). In this filing, ComEd reconciled the final PY2 expenses with the final PY2 revenue. The reconciliation found a \$10.9 million adjustment was required from the Informational Filing. To complete this reconciliation, ComEd submitted an additional information filing in October 2010 to readjust the Rider EDA charges for the 3 customer classes to ensure the appropriate amount was being collected in the appropriate customer classes. Effective with the November 2010 billing cycle, the Rider EDA rates were as follows: (1) Residential (“EDA-R”) = 0.156¢/kWh, (2) Small Commercial & Industrial (“EDA-NS”) = 0.112 ¢/kWh and (3) Large Commercial & Industrial (“EDA-NL”) = 0.070 ¢/kWh.

These steps ensure that the ComEd properly allocates costs across the three customer classes, per the Commission’s directive. Key working papers are included with each of these filings to the Commission.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 22, 2011

REQUEST NO. JLH 3.02:

In Docket No. 07-0540, Mr. Brandt testified that all changes to the Portfolio would be subjected to a rigorous analysis, including application of the TRC test.¹ (Docket No. 07-0540, ComEd Ex. 9.0 at 19). ComEd's Response to Staff Data Request JLH 1.01, the attachment labeled as JLH 1.01_Attach 1, under the "JLH 1.01 PY2PlanBudget" tab shows that ComEd initially budgeted \$3.99 million for Portfolio Administration costs. Page 5 of ComEd Ex. 2.1 (Attachment A-4) shows that on May 20, 2009, ComEd calculated a decreased spending screen by \$2.3 million, while ComEd projected its Portfolio Administration costs would increase to \$4.911 million. Please provide the TRC test calculations that ComEd employed prior to its May 20, 2009 filing that demonstrated its revised planning Portfolio remained cost-effective. Include all supporting documents.

¹ (Docket No. 07-0540, ComEd Ex. 9.0 at 19). ComEd explained that it was not proposing unlimited flexibility. (Id. at 18-20). Mr. Brandt explained that ComEd believes flexibility is a necessary requirement to achieve success in the portfolio, but explained that it does not view this as "carte blanche" to make wholesale changes to the portfolio. (Id. at 19).

RESPONSE:

ComEd objects to this request because it mischaracterizes Mr. Brandt's testimony and applicable law and Commission's orders. Without waiving these objections or any of its General Objections, ComEd states as follows.

In Docket No. 07-0540, Mr. Brandt testified in direct testimony that ComEd "must retain sufficient flexibility to reallocate funds across program elements, including the ability to modify, discontinue and add program elements within approved programs based on subsequent market research and actual implementation experience." Brandt Dir., ComEd Ex. 2.0, 36:814-16 (ICC Docket No. 07-0540, Nov. 15, 2007). In his rebuttal testimony, Mr. Brandt further underscored that these types of changes to program elements – "e.g., adding or subtracting measures, changing delivery mechanisms" – "would be subject to a rigorous analysis, including application of the TRC test." Brandt Reb., ComEd Ex. 9.0, 19:477-79 (ICC Docket No. 07-0540, Dec. 21, 2007).

¹ (Docket No. 07-0540, ComEd Ex. 9.0 at 19). ComEd explained that it was not proposing unlimited flexibility. (Id. at 18-20). Mr. Brandt explained that ComEd believes flexibility is a necessary requirement to achieve success in the portfolio, but explained that it does not view this as "carte blanche" to make wholesale changes to the portfolio. (Id. at 19).

Consistent with Mr. Brandt's testimony, the change in Portfolio Administration costs, which is not a program element, was subject to a rigorous analysis appropriate for the type of change being made to the portfolio. Specifically, because the overall budget for PY2 decreased due to the reduced spending screen while the kWh target remained the same with essentially the same program mix, it was a mathematical certainty that the portfolio TRC could only move in the direction of increasing cost-effectiveness. Under this set of facts, ComEd determined that it was not necessary to invest limited resources to undertake what is a time consuming TRC analysis. In terms of an increase in Portfolio Administration costs in Attachment A-4 of ComEd Ex 2.1, this is offset by reduced program costs across several programs (e.g., Residential Lighting Program was budgeted in PY2 in ComEd's original Plan for \$12.0M, but was reforecasted at a budget of \$9.53M in Attachment A-4).

As a general matter, as ComEd makes changes to its portfolio, it also makes determinations regarding what type of analyses are required to evaluate impacts on the portfolio. The scope of each analysis is dependent on the particular type of change(s) made to the portfolio.

Where applicable for a given Plan year, ComEd will provide the Energy Division Staff with an updated Portfolio-level planning TRC test value in its annual Informational Filing.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 22, 2011

REQUEST NO. JLH 3.03:

In Docket No. 07-0540, Mr. Brandt testified that all changes to the Portfolio would be subjected to a rigorous analysis, including application of the TRC test.¹ (Docket No. 07-0540, ComEd Ex. 9.0 at 19). Page 5 of ComEd Ex. 2.3 (Attachment A-4) shows that on May 20, 2010, ComEd calculated a decreased spending screen. Please provide the TRC test calculations that ComEd employed prior to its May 20, 2010 filing that demonstrated its revised planning Portfolio remained cost-effective. Include all supporting documents.

¹ See Footnote 1 to JLH 3.02.

RESPONSE:

ComEd objects to this request because it mischaracterizes Mr. Brandt's testimony and applicable law and Commission's orders and because it is neither relevant nor likely to lead to the discovery of admissible evidence. The present docket involves the reconciliation of revenues collected under Rider EDA with the actual costs associated with energy efficiency and demand response programs for the period June 1, 2009 through May 31, 2010. Without waiving these objections or any of its General Objections, ComEd states as follows.

In ICC Docket No. 07-0540, Mr. Brandt testified in direct testimony that ComEd "must retain sufficient flexibility to reallocate funds across program elements, including the ability to modify, discontinue and add program elements within approved programs based on subsequent market research and actual implementation experience." Brandt Dir., ComEd Ex. 2.0, 36:814-16 (ICC Docket No. 07-0540, Nov. 15, 2007). In his rebuttal testimony, Mr. Brandt further underscored that these types of changes to program elements – "e.g., adding or subtracting measures, changing delivery mechanisms" – "would be subject to a rigorous analysis, including application of the TRC test." Brandt Reb., ComEd Ex. 9.0, 19:477-79 (ICC Docket No. 07-0540, Dec. 21, 2007).

The updated (and decreased) spending screen is not a product of the flexibility granted by the Commission to ComEd in administering its portfolio, but rather is required by the Commission's order in ICC Docket No 07-0540 and Section 8-103 of the Public Utilities Act. *Commonwealth Edison Co.*, ICC Docket No. 07-0540, Final Order (Feb. 6, 2008), at 29-30; 220 ILCS 5/8-103(d). Moreover, and in any event, the decreased spending screen was subject to a rigorous analysis appropriate for the type of change being made to the portfolio. Specifically, because the overall

¹ See Footnote 3.

budget for PY2 decreased due to the reduced spending screen while the kWh target remained the same with essentially the same program mix, it was a mathematical certainty that the portfolio TRC could only move in the direction of increasing cost-effectiveness. Under this set of facts, ComEd determined that it was not necessary to invest limited resources to undertake what is a time consuming TRC analysis.

As a general matter, as ComEd makes changes to its portfolio, it also makes determinations regarding what types of analyses are required to evaluate impacts on the portfolio. The scope of each analysis is dependent on the particular type of change(s) made to the portfolio.

Where applicable for a given Plan year, ComEd will provide the Energy Division Staff with an updated Portfolio-level planning TRC test value in its annual Informational Filing.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.04:

Given that ComEd is the only utility in Illinois updating its spending screens and savings goals on an annual basis,¹ is ComEd open to the idea to provide the updated Portfolio-level planning TRC test value (excluding low-income programs) in its annual Informational Filings (perhaps as a footnote in Attachment A-4 and provide Energy Division Staff with the supporting documents)? If no, please thoroughly explain.

¹ (Docket No. 10-0570, Final Order at 40)

RESPONSE:

ComEd objects to this data request because it assumes facts not in evidence and to the extent it mischaracterizes applicable law and Commission Orders. Notwithstanding these objections or any of its General Objections, ComEd states as follows.

As an initial matter, ComEd notes that the Order in ICC Docket No. 10-0570 applies to Plan Years 4 through 6, not Plan Year 2. Plan Year 2 is governed by the Order in ICC Docket No. 07-0540, which requires ComEd to update only the spending screens, not the savings goals.

Where applicable for a given Plan year (see ComEd's Response to Staff Data Request JLH 3.02 and to Staff Data Request 3.03), ComEd will provide the Energy Division Staff with an updated Portfolio-level planning TRC test value in its annual Informational Filing.

¹ (ICC Docket No. 10-0570, Final Order at 40)

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.05:

ComEd's Response to Staff Data Request JLH 2.01(c) implies that ComEd does not include estimates of non-Rider EDA costs in its planning-level TRC test calculations. ComEd correctly included estimates of ComEd Admin costs for non-Rider EDA labor when estimating the TRC test value on an ex-post basis. (Staff DR JLH 2 Attach 1 at 4). Is ComEd open to the idea to include estimates of non-Rider EDA labor in its TRC test calculations when it files its next 3-year energy efficiency plan? If no, please thoroughly explain.

RESPONSE:

ComEd objects to this request because it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, calls for speculation, and to the extent it mischaracterizes applicable law and Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows. Because ComEd's next triennial energy efficiency plan will not be filed until the Fall of 2013, ComEd cannot now predict how much non-Rider labor, if any, will be utilized in the next plan. Consistent with the process ComEd followed in developing its prior energy efficiency plans, ComEd will consult with stakeholders through the Stakeholder Advisory Group regarding the development of the next plan, including the TRC test analysis and the appropriateness of including non-Rider EDA labor costs, if any.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.06:

ComEd's Response to Staff Data Request JLH 2.01(c) implies that ComEd does not include estimates of non-Rider EDA costs in its planning-level TRC test calculations. ComEd correctly included estimates of ComEd Admin costs for non-Rider EDA labor when estimating the TRC test value on an ex-post basis. (Staff DR JLH 2 Attach 1 at 4). Is ComEd open to the idea to provide the updated Portfolio-level planning TRC test value (excluding low-income programs) that includes estimates of non-Rider EDA labor in its annual Informational Filings (perhaps as a footnote in Attachment A-4 and provide Energy Division Staff with the supporting documents)? If no, please thoroughly explain.

RESPONSE:

ComEd hereby incorporates by reference the objections set forth in its response to Staff Data Request JLH 3.04 and Staff Data Request JLH 3.05. Without waiving these objections or any of its General Objections, ComEd states as follows. Please see ComEd's Response to Staff Data Request JLH 3.04 and Staff Data Request JLH 3.05.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 17, 2011

REQUEST NO. JLH 3.07:

Please provide the ex-post TRC test value (excluding low-income programs) for the entire PY2 portfolio (including DCEO).¹ Include all supporting documents.

¹ Please ensure that the actual final values are utilized in the analysis. It appears that the portfolio-level costs were understated by \$805,073 [=($\$7,962,597 - \$7,157,524$)] in the TRC analysis of the ComEd-only portfolio (TRC=2.84) provided in its Response to Staff Data Request JLH 1.01.

RESPONSE:

ComEd objects to this request because it is neither relevant nor likely to lead to the discovery of admissible evidence, assumes facts not in evidence, and to the extent it seeks information that is not within ComEd's custody or control. Without waiving these objections or any of its General Objections, ComEd states as follows.

ComEd is unable to provide ex-post cost-benefit analysis for the DCEO-administered part of the portfolio. ComEd does not have access to key data from DCEO that is required to perform such an analysis. Key data include kWh saved by program, measure type and mix, measure life, and participant costs plus program administration costs.

ComEd is also uncertain how Staff arrived at a portfolio cost of \$7,962,597 as alleged in this data request, and therefore ComEd does not agree with that value. However, for purposes of this response, ComEd has recalculated the TRC for a hypothetical scenario where the portfolio cost for ComEd's portion of the portfolio is \$7,962, 597 instead of \$7,157,524. This scenario yields a TRC value of 2.82. The attachment labeled as JLH 3.07_Attach 1 contains a copy of the original DSMore sheet. Cells H47-50 show the original calculated TRC value (using the yellow and blue shaded cells from the table), while Cells I47-50 show the updated calculation which includes the purported \$805,073 shortfall that Staff claims was reflected in ComEd's Response to Staff Data Request JLH 1.01.

¹ Please ensure that the actual final values are utilized in the analysis. It appears that the portfolio-level costs were understated by \$805,073 [=($\$7,962,597 - \$7,157,524$)] in the TRC analysis of the ComEd-only portfolio (TRC=2.84) provided in Response to Staff Data Request JLH 1.01.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.13:

Does ComEd believe the portfolio-level TRC calculation bears any relationship to prudence or reasonableness of costs? Please answer and distinguish between planning level versus ex post.

RESPONSE:

ComEd objects to this request because it is overbroad, vague and ambiguous and to the extent it calls for a legal conclusion. Without waiving these objections or any of its General Objections, ComEd states as follows. Section 8-103 of the Public Utilities Act provides that each electric utility must demonstrate as part of its triennial energy efficiency and demand response plan that "its overall portfolio of energy efficiency and demand-response measures, not including programs covered by item (4) of this subsection (f), are cost-effective using the total resource cost test...." 220 ILCS 5/8-103(f)(5). If the Commission determines that the utility has made the requisite demonstration under Section 8-103(f)(5) and that the utility otherwise satisfies the requirements of Section 8-103(f), then the utility is entitled to recover "the prudently and reasonably incurred costs of Commission-approved programs." 220 ILCS 5/8-103(f)(6).

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.14:

Please indicate whether ComEd agrees or disagrees with the following hypothetical scenarios based on only the information given in each statement. Feel free to qualify answers (e.g., based on program admin costs...).

- (a) It is possible to include only cost-effective measures in a program and the program fail the TRC test.
- (b) It is possible to include only cost-effective measures in a portfolio and the portfolio fail the TRC test.
- (c) It is possible to implement only cost-effective program elements in a portfolio and the portfolio fail the TRC test.
- (d) It is possible to achieve the statutory energy savings goals within the spending screen and the portfolio fail the TRC test.
- (e) It is possible to achieve the statutory energy savings goals within the spending screen by implementing only cost-effective measures in a portfolio and the portfolio fail the TRC test.
- (f) It is possible to achieve the statutory energy savings goals within the spending screen by implementing only cost-effective measures in cost-effective program elements in a portfolio and the portfolio fail the TRC test.

RESPONSE:

ComEd objects to this data request because it is overbroad, vague and ambiguous, calls for speculation, and is neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving these objections or any of its General Objections, ComEd states as follows.

- (a) Yes, it would be possible to include only cost-effective measures in a program and the program fail the TRC test. For example, the program administration costs could increase the overall program costs such that they exceed the program benefits.
- (b) Yes, it would be possible to include only cost-effective measures in a portfolio and the portfolio fail the TRC test. The same example provided in subpart (a) would apply here.

- (c) Yes, it would be possible to implement only cost-effective program elements in a portfolio and the portfolio fail the TRC test. For example, the non-program element costs could increase the overall portfolio costs such that they exceed the portfolio benefits.
- (d) ComEd cannot provide a response to this question due to its speculative nature and vague and ambiguous terms.
- (e) ComEd cannot provide a response to this question due to its speculative nature and vague and ambiguous terms.
- (f) ComEd cannot provide a response to this question due to its speculative nature and vague and ambiguous terms.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 3.01 – 3.17

Date Received: June 6, 2011

Date Served: June 10, 2011

REQUEST NO. JLH 3.15:

Page 36 of the Appliance Recycling PY2 EM&V report states that "ComEd should consider conducting further research to examine the cost-effectiveness of direct mail in comparison to other Appliance Recycling Program marketing methods."

- (a) To date, has ComEd performed this cost-effectiveness analysis for marketing? If yes, please provide analysis.
- (b) If the answer to part (a) is no, does ComEd plan to conduct this analysis in the near future?
- (c) If the answer to part (b) is no, please justify the reasonableness and prudence of ComEd's marketing approach going forward.

RESPONSE:

ComEd objects to this request because it is neither relevant nor likely to lead to the discovery of admissible evidence. The present docket involves the reconciliation of revenues collected under Rider EDA with the actual costs associated with energy efficiency and demand response programs for the period June 1, 2009 through May 31, 2010.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 5.01 – 5.06

Date Received: June 15, 2011

Date Served: July 22, 2011

REQUEST NO. JLH 5.01:

Did ComEd attempt to minimize administrative costs to the fullest extent practicable, without sacrificing energy efficiency program performance in PY2? If yes, please provide a detailed description and supporting documentation of the steps taken to minimize administrative costs, without sacrificing energy efficiency program performance. If no, please thoroughly explain.

RESPONSE:

ComEd objects to this request because it is overbroad, vague and ambiguous and to the extent it mischaracterizes, or seeks to impose obligations not otherwise imposed by, applicable law and Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows.

As an initial matter, for purposes of this response ComEd interprets the phrase "administrative costs" to mean the incremental internal labor costs that are described in and were recovered through Rider EDA during Plan Year 2. In its Commission-approved 2008 – 2010 Energy Efficiency and Demand Response Plan ("Plan"), ComEd laid out projected incremental labor needs for each of the three years of the Plan. For PY2, ComEd projected to add five additional full-time employees ("FTEs"). In making this determination, ComEd carefully and conservatively planned for an increase in FTEs as the size of the portfolio and workload increased. Following Plan approval, final staffing decisions were made through ComEd's weekly EE Strategy Meetings where ComEd's Energy Efficiency leadership team met to review portfolio performance and discuss and address key portfolio issues, including employee workloads and productivity. As the workload was deemed to exceed current staffing or if new initiatives or projects were ready to commence, the leadership team made the determinations to increase current staff or opt for outside staffing through contractors or consultants.

ComEd also ensures that it obtains maximum productivity from its internal staff through annual employee performance reviews that measure employees' individual performance versus goals designed to achieve the portfolio's goals.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 5.01 – 5.06

Date Received: June 15, 2011

Date Served: June 30 2011

REQUEST NO. JLH 5.02:

Is ComEd open to developing consistent statewide cost categories that will enable Staff, stakeholders, and the Commission to more effectively compare administrative costs (and other cost categories including marketing) on a statewide level? If yes, please provide ComEd's preferred method for achieving this, including a proposed timeline. If no, please thoroughly explain.

RESPONSE:

ComEd objects to this request to the extent it seeks to impose obligations on ComEd inconsistent with or otherwise not imposed by applicable law and Commission orders and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. Please see *Commonwealth Edison Co.*, ICC Docket No. 07-0540 Final Order (Feb. 6, 2008) at 54 ("We encourage the utilities to coordinate as much as possible. However, we decline to *require* the utilities to do so. There are obvious differences in the territories of the two utilities regarding many items, including, but not limited to, labor costs, housing structure, population density, and, even topography. The utilities must be able to retain the flexibility to address appropriately those differences.") Without waiving these objections or any of its General Objections, ComEd states as follows.

While ComEd believes its cost categories are consistent and clearly defined, ComEd would be open to discussing the development of an alternate set of consistent and clearly defined cost categories. Because ComEd has not had time to develop such categories, ComEd has not yet identified a preferred method for developing these categories, but would be willing to work with ICC Staff to determine a mutually agreeable approach for doing so.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 5.01 – 5.06

Date Received: June 15, 2011

Date Served: June 30, 2011

REQUEST NO. JLH 5.04:

ComEd indicated in its Response to Staff Data Request JLH 3.04 that it will provide the Energy Division Staff with an updated Portfolio-level planning TRC test value in its annual Informational Filing. Please indicate the month and year for which this information will start being made available by ComEd and whether ComEd will also provide all supporting documentation for these calculations.

RESPONSE:

ComEd objects to this data request because it mischaracterizes ComEd's Response to Staff Data Request JLH 3.04. Without waiving this objection or any of its General Objections, ComEd states as follows. Where applicable for a given Plan year (see ComEd's Responses to Staff Data Request JLH 3.02 and to Staff Data Request JLH 3.03), ComEd will provide an updated Portfolio-level planning TRC test value and supporting analysis in the applicable Plan year's Annual Informational Filing.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 5.01 – 5.06

Date Received: June 15, 2011

Date Served: June 30, 2011

REQUEST NO. JLH 5.05:

Please refer to the following documents: JLH 3.16_Attach 1 (pp. 30-38) and JLH 3.16_Attach 2 (pp. 37-48) that ComEd provided in its Response to Staff Data Request JLH 3.16; and Appliance Recycling Evaluation Report PY1 (Dec. 2, 2009) (p. 35) and Appliance Recycling Evaluation Report PY2 (Dec. 21, 2010) (p. 34). The sections of these documents describe (in part) overall satisfaction with ComEd and the impact of the programs on respondents' favorability toward ComEd. Please describe the relevance, usefulness, and necessity of investigating these topics in relation to administering an energy efficiency portfolio. Please explain in detail and provide all supporting documentation (e.g., reports, workpapers) regarding how ComEd used or planned to use this information in implementing its energy efficiency programs.

RESPONSE:

ComEd objects to this request because it mischaracterizes the sections of the documents cited in the request and to the extent it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The present docket involves the reconciliation of revenues collected under Rider EDA with the actual costs associated with energy efficiency and demand response programs for the period June 1, 2009 through May 31, 2010. Without waiving these objections or any of its General Objections, ComEd states as follows.

As an initial matter, the pages referenced in the documents described in this request address a variety of survey results, including awareness of ComEd energy efficiency programs in general, awareness of specific ComEd energy efficiency programs, the likelihood of respondents to participate in a given program, and respondents' preferred communications channels. With respect to customer satisfaction in particular, ComEd views this area as one way of evaluating how well ComEd is implementing the energy efficiency portfolio. If customers are satisfied with ComEd, the programs and how the programs are being implemented, ComEd believes customers are more likely to participate in other programs and encourage others to do so as well, which results in increased kWh savings. Accordingly, ComEd uses this information, along with all the other information gleaned from these surveys, to assess each program's performance and the ability to implement improvements to the programs.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 6.01 – 6.06

Date Received: June 17, 2011

Date Served: July 21, 2011

REQUEST NO. JLH 6.01:

Please refer to page 174 (File List) of the document, "JLH 3 07_Attach 1.pdf" that ComEd provided in its Response to Staff Data Request JLH 3.07.

- (a) Please provide all files listed on page 174, including the Aggregate file in native DSMore format.
- (b) In addition, include a summary spreadsheet that shows the costs, savings, and measure lifetime values used as inputs into each of the DSMore files.
- (c) Demonstrate that the input costs match the expenses ComEd provided in its Response to Staff Data Request JLH 1.05_Attach 1 (Docket No. 10-0520) (aka Docket No. 10-0537, "Staff DR JLH 2 Attach 1" at 3) and the EM&V allocation ComEd provided in the document, "JLH 1.01 CORRECTED_Attach 1" on page 2, "JLH 1.02 PY2 Expenses".¹
- (d) Please provide ComEd's ex-post TRC test value for PY2 using the correct values. Include all supporting documents and DSMore spreadsheets. For each program or measure category, please explain the basis of the input assumptions used in the DSMore spreadsheets (e.g., measure lifetime, savings, costs).

¹ For example, explain why the incentive costs of \$28,547,832 listed on page 1 of "JLH 3 07_Attach 1.pdf" do NOT match the incentive costs of \$29,066,156 listed in column b in the document, "JLH 1.01 CORRECTED_Attach 1" on page 2, "JLH 1.02 PY2 Expenses". The mismatch of portfolio-level costs identified in Staff Data Request JLH 3.07 in no way represents the only discrepancies found.

RESPONSE:

ComEd objects to this request because it is overbroad, unduly burdensome, is neither relevant nor likely to lead to the discovery of admissible evidence and to the extent it seeks to impose obligations not otherwise imposed by applicable law and Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows.

- (a) Please see the CD-ROM marked as JLH 6.01_Attach 1, which contains the requested files.
- (b) For the input values that are used for each DSMore worksheet, please refer to each file provided on the CD-ROM labeled as JLH 6.01_Attach 1. The requested data can be found in the "Program Input" tab for each workbook.

- (c) The attachment labeled as JLH 6.01_Attach 2 contains a revised program cost spreadsheet used to revise TRC calculations to correspond to “Staff DR JLH 2 Attach 1”, but modified for final M&V allocations.
- (d) The attachment labeled as JLH 6.01_Attach 3 contains a comparison of TRC results from the original cost-effectiveness analysis and the new analysis that corresponds to the program costs listed in subpart ‘c’. The underlying assumptions have remained the same for each program. However, in order to re-run the TRC calculations, all analyses were conducted on the new DSMore 2011 platform (the previous analysis was conducted on the DSMore 2010 platform). This platform change resulted in slight changes in TRC calculations for programs that had no input changes. ComEd has not differentiated between changes caused by platform differences versus cost revisions, but does note that there were no meaningful changes in any TRC result. The CD-ROM marked as JLH 6.01_Attach 4 contains the DSMore analyses, and input data can be found in the “Program Input” tabs.

Program Year 2 Expenses- Revised per final values
7/7/2011

	Implementer Cost	Incentive Cost	Marketing/ Other Cost	External Program Costs	ComEd Rider Labor & Expense	ComEd Non- Rider Labor & Expense	Revised Total Incremental
Residential lighting	\$ 2,169,810	\$ 9,074,820	\$ 446,717	\$ 11,691,347	\$ 179,004	\$ 28,841	\$ 11,899,192
Appliance recycling	\$ 2,325,217	\$ 641,200	\$ 680,186	\$ 3,646,603	\$ 109,020	\$ 165,903	\$ 3,921,526
Res. Multi-family all-electric sweep	\$ 188,030	\$ 456,884	\$ 5,102	\$ 650,016	\$ 33,237	\$ 43,944	\$ 727,197
Single Family Performance	\$ 129,687	\$ 198,628	\$ 37,528	\$ 365,843	\$ 33,237	\$ 33,875	\$ 432,955
CACES ⁽¹⁾	\$ 1,192,330	\$ 1,581,600	\$ 145,995	\$ 2,919,925	\$ 73,799	\$ 201,704	\$ 3,195,428
Total Residential Programs	\$ 6,005,074	\$ 11,953,132	\$ 1,315,528	\$ 19,273,734	\$ 428,297	\$ 474,267	\$ 20,176,298
C&I Prescriptive	\$ 4,045,190	\$ 12,927,653	\$ 173,000	\$ 17,145,843	\$ 244,390	\$ 95,137	\$ 17,485,370
C&I Custom	\$ 1,011,295	\$ 2,641,511	\$ 43,250	\$ 3,696,056	\$ 61,097	\$ 23,784	\$ 3,780,937
C&I Retrocommissioning	\$ 608,849	\$ 1,407,405	\$ 3,270	\$ 2,019,524	\$ 130,457	\$ 21,603	\$ 2,171,584
C&I New Construction	\$ 485,723	\$ 86,425	\$ 6,650	\$ 578,798	\$ 62,090	\$ 15,416	\$ 656,304
Total Business Programs	\$ 6,151,057	\$ 17,062,994	\$ 226,170	\$ 23,440,221	\$ 498,034	\$ 155,940	\$ 24,094,195
Demand Response ⁽²⁾	\$ 294,803	\$ 74,995	\$ 449,347	\$ 819,145		\$ 47,300	\$ 866,445
Other Portfolio Costs	\$ 5,255,861	\$ -	\$ 646,842	\$ 5,902,703	\$ 1,422,985	\$ 672,951	\$ 7,998,639
Total Portfolio Costs	\$ 17,706,795	\$ 29,091,121	\$ 2,637,887	\$ 49,435,803	\$ 2,349,316	\$ 1,350,458	\$ 53,135,577

Notes

- 1) CACES incentive costs (not paid to customer) are added to implementer costs for TRC calculations
- 2) Capitalization of Demand Response installations only includes depreciation on \$599,209 of expenditures for TRC Calculation

Rider EDA \$ 51,785,119

PY2 Results comparisons	PY2 Net Mwh	Reported TRC DSMore 2010	Revised TRC DSMore 2011
Residential Energy Star Lighting	202,557	5.84	5.77
Appliance Recycling *	32,624	3.97	3.96
All-Electric Efficiency Upgrade	1,840	2.5	2.44
All-Electric Single Family Home Energy Performance Tune-Up	638	0.95	0.92
Central Air Conditioning Efficiency Services *	1,964	0.33	0.32
Business Prescriptive	191,896	2.67	2.68
Business Custom	17,255	1.82	1.80
C&I Retro-Commissioning	6,574	1.41	1.47
C&I New Construction *	803	0.87	0.88
Central Air Conditioning Cycling	NA	3.73	3.71
ComEd Portfolio TOTAL	472,132	2.84	2.81

* These Programs had no changes for revised calculations

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 6.01 – 6.06

Date Received: June 17, 2011

Date Served: July 22, 2011

REQUEST NO. JLH 6.02:

Please provide copies of ComEd's contracts with its implementers whose costs flow through Rider EDA.

- (a) This request is intended to encompass the specific information ComEd requires its contractors to submit to ComEd.
- (b) Please indicate the amount (\$ and %) by which contractor costs (component costs, e.g., cost per unit, hourly labor cost) have increased from the time of initial program implementation to PY2 for each contractor and provide an explanation for these increased costs. Indicate the impact this has had on total portfolio expenses.

RESPONSE:

Please see the CD-ROM marked as JLH 6.02_Attach 1 (CONFIDENTIAL AND PROPRIETARY) and/or JLH 6.02_Attach 1 (PUBLIC) for files containing ComEd's contracts with its implementers whose costs flowed through Rider EDA during PY2.

- (a) This subpart does not require a response. To the extent this subpart purports to require a response, ComEd objects that this subpart is overbroad, vague and ambiguous and unduly burdensome.
- (b) ComEd objects to this request because it is overbroad, vague and ambiguous. Without waiving these objections or its General Objections, ComEd states the following. The attachment labeled as JLH 6.02_Attach 2 was prepared in response to this request. This table shows the contractor costs for each program for PY1 and PY2. In addition, ComEd is including the MW saved per program and the contractor cost per MWh saved. ComEd believes the contractor cost per MWh saved is the appropriate comparison for this request as it demonstrates that for each program that existed in both PY1 and PY2, the contractor cost per MWh was reduced from PY1 to PY2.

ICC Dkt.No. 10-0537
 JLH 6.02_Attach 2

Comparison of Contractor cost (\$/kWh) - PY1 vs PY2

Program	PY1			PY2			\$/kWh Change PY1 to PY2 %
	Contractor Costs	Net savings	Contractor Costs / MWh	Contractor Costs	Net savings	Contractor Costs / MWh	
	\$	MWh	\$/kWh	\$	MWh	\$/kWh	
Residential lighting	\$ 1,879,027	60,789	\$ 0.031	\$ 2,206,538	202,557	\$ 0.011	-65%
Appliance recycling	\$ 1,301,348	11,478	\$ 0.113	\$ 2,325,217	32,624	\$ 0.071	-37%
Multi-family all-electric sweep	\$ 222,476	1,852	\$ 0.120	\$ 188,030	1,840	\$ 0.102	-15%
CACES	\$ 369,640			\$ 1,192,330	1964	\$ 0.607	
Single family Performance				\$ 129,687	638	\$ 0.203	
Total Residential Programs	\$ 3,772,491	74,119	\$ 0.051	\$ 6,041,802	239,623	\$ 0.025	-50%
C&I Prescriptive	\$ 2,120,928	80,932	\$ 0.026	\$ 4,045,190	191,896	\$ 0.021	-20%
C&I Custom	\$ 530,232	4,761	\$ 0.111	\$ 1,011,295	17,255	\$ 0.059	-47%
C&I Retrocommissioning	\$ 201,455	1,090	\$ 0.185	\$ 608,849	6,574	\$ 0.093	-50%
Small C&I CFL Intro Kit	\$ 300,149	2,815	\$ 0.107				
C&I New Construction	\$ 100,000			\$ 485,723	803	\$ 0.605	
Total C&I Programs	\$ 3,252,764	89,598	\$ 0.036	\$ 6,151,057	216,528	\$ 0.028	-22%

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 6.01 – 6.06

Date Received: June 17, 2011

Date Served: July 12, 2011

REQUEST NO. JLH 6.03:

Does the Company require its implementers, whose costs flow through Rider EDA, to explicitly disclose its marketing costs to the Company?

- (a) If yes, please provide a table similar to ComEd's Response to Staff Data Request JLH 1.02 (excluding columns e, f, and g) by breaking out the marketing costs from the contractor costs (column a) and providing two columns for marketing costs: one column for contractor marketing costs and one column for ComEd marketing costs. Please indicate the marketing costs for each program and provide this table in an unlocked excel spreadsheet with working formulas.
- (b) If no, please explain why the Company does not require this information.

RESPONSE:

ComEd objects to this request because it is overbroad, vague and ambiguous and neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving these objections or any of its General Objections, ComEd states as follows. ComEd procured the implementers of the PY2 energy efficiency program elements through a competitive bidding process whose criteria included, among others, the cost per kilowatt-hour of energy savings achieved. For those implementers with which ComEd has entered into an implementation contract, ComEd continuously monitors contract compliance. *See* ComEd's Response to Staff Data Request JLH 5.01. Because many implementers' costs are packaged, bid and evaluated as the cost per kilowatt-hour of energy savings achieved, ComEd does not require that implementers "explicitly disclose [their] marketing costs to the Company."

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 6.01 – 6.06

Date Received: June 17, 2011

Date Served: July 12, 2011

REQUEST NO. JLH 6.04:

Does the Company track its implementers' marketing costs for energy efficiency programs, which flows through Rider EDA?

- (a) Please provide an updated ComEd Response to Staff Data Request ST 1.01 ("ST 1.01_Attach 1.xls") that includes a classification column in the "GL" tab (general ledger) that explicitly identifies the journal entries that are associated with marketing expenditures by implementers and by ComEd.
- (b) If ComEd cannot provide the information requested in part (a), to ensure transparency, is ComEd open to requiring its energy efficiency contractors to submit information regarding their marketing expenses to enable Staff, stakeholders, and the Commission to more effectively review Rider EDA expenditures to ensure they were prudently incurred and reasonable in amount? If no, please thoroughly explain.
- (c) If ComEd cannot provide the information requested in part (a), to ensure transparency, is ComEd open to explicitly tracking marketing expenses (by implementer and by ComEd) to enable Staff, stakeholders, and the Commission to more effectively review Rider EDA expenditures to ensure they were prudently incurred and reasonable in amount? If no, please thoroughly explain. If yes, please indicate the date by which the Company will begin doing this.
- (d) If ComEd cannot provide the information requested in part (a), to ensure transparency, is ComEd open to explicitly tracking marketing expenses (by implementer and by ComEd) in its GL to enable Staff, stakeholders, and the Commission to more effectively review Rider EDA expenditures to ensure they were prudently incurred and reasonable in amount? If no, please thoroughly explain. If yes, please indicate the date by which the Company agrees to begin doing this and which plan year reconciliation proceeding the Company agrees to have this information available for review by Staff, stakeholders, and the Commission.

¹ In the Final Order in Docket No 10-0570, the Commission concludes:

We further find that ComEd has adequately addressed CUB/City's concerns regarding the disclosure of marketing costs, and we therefore decline to order anything further in this regard. The Commission notes that ComEd's costs are subject to review in the annual reconciliation proceedings required by the statute and Rider EDA. (Docket No. 10-0570, Final Order at 57) (emphases added).

In the recent NS-PGL EE Plan Order (Docket No. 10-0564), an energy efficiency plan docket in which the Commission had more than 3 months to issue an order, the Commission concludes:

The Commission agrees with CUB-City that it is important to monitor administrative costs. Section 8-104 does not impose any specific cap on these costs, and the Commission declines to impose a cap. The Utilities shall report annually on administrative costs and marketing costs for each of its residential and business programs, and make the report available to SAG members for review (NS-PGL EE Plan Order at 92) (emphases added).

In the recent Nicor EE Plan Order (Docket No. 10-0562), the Commission concludes:

Nicor shall report annually on administrative costs and marketing costs for each of its residential and business programs, and make the report available to SAG members for review. (Nicor EE Plan Order at 44).

CEE 0004412

RESPONSE:

ComEd objects to this request because it is overbroad, unduly burdensome, vague and ambiguous, and neither relevant nor likely to lead to the discovery of admissible evidence. ComEd further objects to this request to the extent it seeks to impose obligations not imposed by applicable law or Commission orders or otherwise implies that ComEd's reporting lacks transparency. Without waiving these objections or any of its General Objections, ComEd states as follows. Please see ComEd's Response to Staff Data Request JLH 6.03. ComEd would be open to having a discussion with Staff regarding the possibility of reporting cost information in an alternate format, subject to information technology constraints.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 7.01 – 7.19

Date Received: June 24, 2011

Date Served: July 25, 2011

REQUEST NO. JLH 7.02:

Please describe each step of the Company's revised energy efficiency expenditures budget development, review and approval process, indicating each level of management scrutiny and approval that is required. Please indicate the general timeline upon which these actions occur each year for each of the energy efficiency programs, marketing expenditures, and administrative expenditures. Provide all supporting documents in word and unlocked excel format where applicable.

RESPONSE:

ComEd objects to this request because it is overbroad, vague and ambiguous, and unduly burdensome and to the extent it seeks to impose obligations not otherwise imposed by applicable law or Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows. ComEd's Commission-approved 2008 – 2010 Energy Efficiency and Demand Response Plan sets forth the budgeted costs of the portfolio (ComEd Ex. 1.0, ICC Docket No. 07-0540), and, as described in ComEd's Response to Staff Data Request JLH 3.03, the Commission requires that ComEd annually update the spending screens pursuant to the computations sets forth in Section 8-103(d) of the Act. Based on the Commission-approved Plan and revised (reduced) spending screen for PY2, prior to the beginning of PY2 ComEd reviewed the original PY2 budget from the Plan to determine if any adjustments based on new information were warranted. ComEd's Energy Efficiency Planning & Measurement group led this effort, working with the various program implementation teams and marketing teams to finalize the PY2 budgets. The revised budget was presented to the Energy Efficiency Strategy team for final sign-off prior to the start of PY2. The attachment labeled as JLH 7.02_Attach 1 contains the original Plan budget and the final revised budget for PY2. *See also* ComEd's Response to the following Staff Data Requests: JLH 5.01, JLH 6.03, and JLH 7.09.

ICC Dkt. No. 10-0537
 JLH 7.02_Attach 1

ORIGINAL PLAN PLAN YEAR 2 - 6/1/09-5/31/10 ComEd Programs		Plan \$	Plan Year 2 Adjusted Spending Screen
Residential		\$ 23,840,000	19,293,000
Residential Lighting Program		\$ 11,970,000	9,533,000
Appliance Recycling Program		\$ 4,760,000	3,471,000
Residential Multi-family "All Electric" Sweep		\$ 760,000	760,000
Residential - HVAC Diagnostics & Tune-Up		\$ 1,260,000	
Residential New HVAC w/Quality Installation		\$ 4,490,000	5,278,000
Single Family Home Performance		\$ 570,000	251,000
Residential Advanced Lighting Package		\$ 30,000	-
Total Residential Program Costs		\$ 23,840,000	19,293,000
C & I		\$ 27,300,000	27,298,000
C & I Prescriptive		\$ 13,950,000	14,685,000
C&I Custom		\$ 10,450,000	9,900,000
C&I Retrocommissioning		\$ 2,420,000	2,115,000
Small C&I CFL Intro Kit		\$ -	
C&I New Construction		\$ 480,000	598,000
Total C & I		\$ 27,300,000	27,298,000
Demand Response (A/C Cycling/Nature First)		\$ 1,000,000	1,000,000
EIO Interval Data Profiler & Energy Star		\$ 600,000	600,000
DCEO (25% of EDA Revenue)		\$ 19,783,000	19,200,000
Educational / Outreach		\$ 1,500,000	2,200,000
R&D / Emerging Technologies		\$ 1,100,000	2,377,000
Portfolio Administration		\$ 3,990,000	4,911,000
Measurement & Verification (M&V)		\$ 2,448,000	2,377,000
TOTAL PORTFOLIO		\$ 81,561,000	79,256,000

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 7.01 – 7.19

Date Received: June 24, 2011

Date Served: July 27, 2011

REQUEST NO. JLH 7.05:

Please provide all TRC analyses conducted for or during PY2. Please provide in original format and include all internal memos regarding the results, and provide a brief summary of the focus of each analysis. Please justify the costs for the TRC software (e.g., in relation to the amount it's actually used by the Company). Provide all supporting documents in word, DSMore, and unlocked excel format where applicable.

RESPONSE:

ComEd objects to this request because it is overbroad, unduly burdensome, vague and ambiguous, seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence, and to the extent it seeks to impose obligations not otherwise imposed by applicable law or Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows. The requested TRC analyses are provided on a DVD labeled as JLH 7.05_Attach 1. The total number of analyses (3,547 total) are simply too numerous to provide a brief summary at the individual analysis level. However, the majority of the analyses can be grouped into the following categories:

- Custom Project TRC Sheets – During PY1 and PY2, KEMA was required to conduct TRC analyses of every custom project that either a) received a reservation or b) received an incentive payment. Prior to January, 2010, this analysis was done on a spreadsheet template that ComEd built; this template used the same measure-level calculations as the planning spreadsheet that ICF developed in 2007. In January, 2010, the DSMore tool replaced the spreadsheet.
- Consumer Electronics – in PY2, ComEd piloted a consumer electronics program with Best Buy in the Chicago area. This pilot focused on televisions and computers that met CEE's highest efficiency tiers at that time. ComEd also reviewed other, related programs during this effort.
- White Goods – in PY2, ComEd conducted preliminary research into various energy-efficient appliances. This research eventually led to a clothes washer pilot that was conducted in PY3.
- New Technologies – During PY2 and PY3, ComEd participated in the "L-Prize" effort by the DOE; the L-prize was a "golden carrot" contest to promote manufacture of highly efficacious Light-Emitting Diode (LED) lamps to replace incandescent bulbs. ComEd conducted preliminary cost-effectiveness testing of the Philips product to ascertain its viability as a possible measure in energy efficiency programs.

- ICF to DSMore comparative analyses – ComEd ran the existing measure list from the ICF model in DSMore to determine whether the change in software would result in a significant shift in measure TRC. While the DSMore results were slightly lower than the ICF results, these appeared to be primarily due to lower energy supply prices that were in effect when the DSMore software was acquired.
- PY1 Evaluation – as part of the final evaluation reports, ComEd ran program-level TRC tests using the ex-post savings. These DSMore sheets were reviewed and accepted by Navigant for inclusion in the final reports.

With regard to the cost of the TRC software, Section 8-103 of the Public Utilities Act requires that electric utilities “implement cost-effective energy efficiency measures”, and further defines “cost-effective” as “measures [that] satisfy the total resource cost test, which is further defined in the Illinois Power Agency Act. *See* 220 ILCS 5/8-103(a)-(b); 20 ILCS 3855/1-10. To comply with this requirement, ComEd determined that a commercially-available software package that is widely used across the country would provide a more efficient and comprehensive platform for conducting TRC analyses as part of ComEd’s planning and portfolio management process than ad-hoc spreadsheets. Of the commercially-available packages, ComEd found that DSMore was superior to its competitors in the way it evaluates multiple energy price and weather scenarios and provided the best value.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 7.01 – 7.19

Date Received: June 24, 2011

Date Served: July 11, 2011

REQUEST NO. JLH 7.09:

Please describe all steps a prudent energy efficiency portfolio manager would take in administering a three-year energy efficiency portfolio. For each step, provide examples of how ComEd has incorporated this step into its daily, weekly, monthly, quarterly, and yearly operations.

RESPONSE:

ComEd objects to this data request because it is overbroad, vague and ambiguous, unduly burdensome, calls for speculation, and is neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving these objections or any of ComEd's General Objections, ComEd states the following. The purpose of this docket is to reconcile "revenues collected under Rider EDA with the actual costs associated with energy efficiency and demand response programs" for the period June 1, 2009 through May 31, 2010, which is "Plan Year 2" of ComEd's Commission-approved 2008 – 2010 Energy Efficiency and Demand Response Plan ("Plan"). In Section 8-103 of the Public Utilities Act, the General Assembly set forth the requirements with which ComEd must comply regarding its Plan, and the Commission approved the Plan in its order in ICC Docket No. 07-0540. Since then, ComEd has efficiently and effectively implemented its Plan, as demonstrated in both this docket and in ICC Docket 09-0378, which showed that ComEd exceeded the energy savings goals for Plan Years 1 and 2 well under budget. For a description of the actions ComEd employees undertook to successfully implement the Plan during Plan Year 2, please see ComEd Ex. 2.0, the Direct Testimony of Michael S. Brandt, and ComEd's Response to Staff Data Request JLH 5.01.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 7.01 – 7.19

Date Received: June 24, 2011

Date Served: July 11, 2011

REQUEST NO. JLH 7.13:

Is it ComEd's position that reporting information regarding its energy efficiency programs for PY2) to the SAG is a substitute for reporting information to the Commission? With respect to ComEd's energy efficiency plans, programs, and expenditures, please describe and distinguish between what ComEd perceives the SAG's role to be and what ComEd perceives the Commission's role to be.

RESPONSE:

ComEd objects to this request because it is vague and ambiguous and to the extent it calls for a legal conclusion. Without waiving these objections or any of its General Objections, ComEd states as follows. With respect to the first sentence of this request, ComEd responds, "No." With respect to the second sentence of this request, the Public Utilities Act and Commission's Order in ICC Docket No. 07-0540 define the roles of the Commission and SAG.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 7.01 – 7.19

Date Received: June 24, 2011

Date Served: July 11, 2011

REQUEST NO. JLH 7.14:

The document, "Commonwealth Edison Company's Energy Efficiency / Demand Response Plan: Annual Report, Plan Year 1, June 1, 2008 – May 31, 2009" (dated February 2010) was filed on e-Docket on March 12, 2010 in Docket No. 07-0540. The term, "annual report" mentioned below means a report that includes similar types of information provided in the aforementioned report filed on March 12, 2010.

- (a) Please provide ComEd's Annual Report for Plan Year 2 (comparable to structure of Plan Year 1 Annual Report).
- (b) If ComEd is unable to provide its Annual Report for Plan Year 2, please provide all of the reasons that ComEd felt it should not report key challenges and modifications to its energy efficiency programs during PY2 or its results in comparison to ComEd's approved EE Plan (costs and savings, and in comparison to the revisions presented in ComEd Ex. 2.1, p. 5, Attach A-4), especially considering ComEd's spending increased by \$24,795,188.36 over the prior year.
- (c) Is it ComEd's position that an annual report to the Commission similar to that provided in Plan Year 1 is unnecessary going forward? If yes, please explain.
- (d) Is it ComEd's position that if it provided an Annual Report similar to that provided in Plan Year 1 (perhaps with a little more detail) that the report could aid in the Commission's, Staff's, and intervenors' review during annual reconciliation proceedings to ensure that costs were reasonable and prudently incurred?
- (e) Is it ComEd's position that it is reasonable to provide an Annual Report for the first year of energy efficiency implementation when ComEd spent \$28,786,778.93?
- (f) Is it ComEd's position that it is reasonable to provide an Annual Report for a year of energy efficiency implementation that ComEd plans to spend \$118,567,857?
- (g) Is it ComEd's position that it is unreasonable to provide an Annual Report for a year of energy efficiency implementation that ComEd plans to spend \$118,567,857?
- (h) Please explain why it might be reasonable for ComEd to provide an Annual Report in the 1st year, but not for a year in which it spend 4 times the amount of money that it did in the 1st year.
- (i) Is ComEd willing to commit to work with Staff (and perhaps the SAG) to come to an agreement regarding specific information that ComEd needs to provide during reconciliation proceedings? If no, please explain the specific information for reconciliation proceedings that ComEd believes is sufficient for determining that ComEd's costs were reasonable in amount and prudently incurred.

¹ \$24,795,188.46[=(53,581,967.39 - \$28,786,778.93)] (Docket No. 10-0520, ComEd Responses to Staff Data Requests JLH 1.05_Attach 1 and JLH 2.03_Attach 1). It should also be noted that ComEd's budgeted spending for PY4 in comparison to its actual expenditures for PY1 is \$89,781,078[=(118,567,857 - \$28,786,778.93)] greater in amount. (ComEd Response to Staff Data Request JLH 3.09 SUPP_Attach 4).

RESPONSE:

- (a) Please see the attachment labeled as JLH 7.14_Attach 1.

- (b) Not applicable.
- (c) Please see ComEd's response to subpart (a). To the extent this subpart seeks additional information, ComEd objects to this data request because it is argumentative and neither relevant nor likely to lead to the discovery of admissible evidence
- (d) Please see ComEd's response to subpart (a).
- (e) Please see ComEd's response to subpart (a). To the extent this subpart seeks additional information, ComEd objects to this data request because it is argumentative and neither relevant nor likely to lead to the discovery of admissible evidence.
- (f) Please see ComEd's response to subpart (a). To the extent this subpart seeks additional information, ComEd objects to this data request because it is argumentative and neither relevant nor likely to lead to the discovery of admissible evidence.
- (g) Please see ComEd's response to subpart (a). To the extent this subpart seeks additional information, ComEd objects to this data request because it is argumentative and neither relevant nor likely to lead to the discovery of admissible evidence.
- (h) Please see ComEd's response to subpart (a). To the extent this subpart seeks additional information, ComEd objects to this data request because it is argumentative and neither relevant nor likely to lead to the discovery of admissible evidence.
- (i) ComEd objects to this request to the extent it seeks to impose obligations on ComEd inconsistent with or otherwise not imposed by applicable law and Commission orders and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving these objections or any of its General Objections, ComEd states as follows. ComEd looks forward to its call with Staff on July 11, 2011 to discuss the subjects raised by this subpart.

ICC Docket No. 10-0537

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 9.01

Date Received: July 12, 2011

Date Served: July 26, 2011

REQUEST NO. JLH 9.01:

Please describe in detail the rules by which the Company allocated Rider EDA costs to each delivery class during PY2 cross referenced with the Total PY2 Incremental Costs by Customer Class (by program) presented in ComEd Ex. 1.0 at 3. Please provide numerical analyses and datasets in an appropriate format such as unprotected Microsoft Excel files. Please include responses in Microsoft Word format, if feasible.

- (a) Please provide all workpapers, and formal documentation of the Company procedures in place including contracts with program administrators. Please describe in detail the cost allocation rules in place with respect to each program element, implementer, program incentive costs, program non-incentive costs, marketing costs (distinguish between those incurred by implementer and by the Company for each program and cost category), as well as program and portfolio administrative costs, market transformation, legal, and program elements that include an upstream mark-down approach.
- (b) Referring to ComEd Ex. 2.1 at 5, please further explain and provide any documentation supporting the Company's projected cost allocation across delivery classes. (e.g., expand upon the information listed under "Notes:" on that page)
- (c) Referring to ComEd Ex. 2.3 at 5, please further explain and provide any documentation supporting the Company's projected cost allocation across delivery classes. (e.g., expand upon the information listed under "Notes:" on that page)
- (d) Regarding Rider EDA, please compare the rules or approach by which the Company *allocates actual costs* incurred to each delivery class, with the rules or approach by which the Company *projects the costs* to each delivery class in its EDA filings. Please identify the main differences and similarities in this regard for each of ComEd's program- and portfolio-wide cost components.

RESPONSE:

ComEd objects to this request because it is overbroad, unduly burdensome, vague and ambiguous, and to the extent it seeks to impose obligations not otherwise imposed by applicable law or Commission orders. Without waiving these objections or any of its General Objections, ComEd states as follows. Please see ComEd's responses to subparts (a) through (d) below.

- (a) Please see the attachment labeled as JLH 9.01_Attach 1, which contains a spreadsheet that shows how ComEd allocated each cost category across the appropriate customer class or classes during PY2. For each cost category, ComEd’s planning team works with the appropriate ComEd personnel (e.g., individual program managers) to determine the cost allocation. On a per program basis, program costs are allocated on a total program cost basis, not by the individual program cost components (e.g., incentives, marketing). A draft of all the cost allocations and the corresponding expense breakdown are then reviewed and approved by ComEd’s Energy Efficiency Strategy team. *See also* ComEd’s Response to Staff Data Request JLH 6.02.
- (b) Although the Notes section already provides the requested information, ComEd provides additional information as follows:
- Note #1 - These costs are allocated to the residential customer class as these costs are deemed 100% residential in nature.
 - Note #2 - These costs are allocated to either the small C&I or large C&I customer class. The allocation differs by program and is determined by discussions with the appropriate program manager.
 - Note #3 – These costs are based on program participation, which is projected to be all large C&I customers
 - Note #4 – ComEd’s marketing department projected the breakdown of educational / outreach costs across the three customer classes.
 - Note #5 – DCEO provided the cost allocation for its respective programs.
 - Note #6 – Per the final order in ICC Docket No. 07-0540, “The costs of the low-income programs, however, are to be equally shared by all customer classes (ICC Docket No. 07-0540, Final Order at 38.). Accordingly, these costs are allocated equally across the three customer classes.
 - Note #7 – The portfolio level costs do not offer a straightforward method to allocate by customer class. ComEd implemented a methodology to determine the allocation of the portfolio level costs by using the percentage breakdown of all other costs as a proxy. These totals are in the “Subtotal of all Program Costs (in dollars)” line on the spreadsheet. The percentage breakdown is on the following line “Allocation of Program Costs by Revenue Class”.
 - Notes #8 & #9 – This cost reflects the summation of all the individual costs. This is the projected cost of the portfolio for the year.
 - Note #10 – This amount reflects how much more money was collected than spent in the preceding year. This money is subtracted from the total to determine the actual amount that will need to be collected.
- (c) Although the Notes section already provides the requested information, please see ComEd’s response to subpart (b) for additional information.
- (d) ComEd makes every effort to implement the same allocation methodology for allocating actual costs versus projected costs. ComEd is not aware of any differences between the two scenarios.

ORIGINAL PLAN PLAN YEAR 2 - 6/1/09-5/31/10 ComEd Programs	Plan \$	Plan Year 2 Adjusted Spending Screen	PY2 Year End May-10	Cost Distribution in %			Cost Distribution in \$		
				Residential	SC&I	LC&I	Residential	SC&I	LC&I
Residential									
Residential Lighting Program	\$ 11,970,000	\$ 9,533,000	\$ 11,691,347	100%			\$ 11,691,347	\$ -	\$ -
Appliance Recycling Program	\$ 4,760,000	\$ 3,471,000	\$ 3,646,603	100%			\$ 3,646,603	\$ -	\$ -
Residential Multi-family "All Electric" Sweep	\$ 760,000	\$ 760,000	\$ 822,397	100%			\$ 822,397	\$ -	\$ -
Residential New HVAC w/Quality Installation	\$ 5,750,000	\$ 5,278,000	\$ 2,919,925	100%			\$ 2,919,925	\$ -	\$ -
Single Family Home Performance	\$ 570,000	\$ 251,000	\$ 373,341	100%			\$ 373,341	\$ -	\$ -
Residential Advanced Lighting Package	\$ 30,000	\$ -					\$ -	\$ -	\$ -
							\$ -	\$ -	\$ -
Total Residential Program Costs	\$ 23,840,000	\$ 19,293,000	19,453,613				\$ 19,453,613	\$ -	\$ -
C & I									
C & I Prescriptive/Custom	\$ 24,400,000	\$ 24,585,000	\$ 20,844,585		65%	35%	\$ -	\$ 13,548,980	\$ 7,295,605
C&I Retrocommissioning	\$ 2,420,000	\$ 2,115,000	\$ 2,036,491			100%	\$ -	\$ -	\$ 2,036,491
C&I New Construction	\$ 480,000	\$ 598,000	\$ 578,798		50%	50%	\$ -	\$ 289,399	\$ 289,399
							\$ -	\$ -	\$ -
Total C & I	\$ 27,300,000	\$ 27,298,000	\$ 23,459,874				\$ -	\$ 13,838,379	\$ 9,621,494
Demand Response (A/C Cycling/Nature First)	\$ 1,000,000	\$ 1,000,000	\$ 819,145	100%			\$ 819,145	\$ -	\$ -
Education/ Market Transformation									
EIO Interval Data Profiler & Energy Star	\$ 600,000	\$ 600,000	\$ 618,377		23%	77%	\$ -	\$ 142,227	\$ 476,150
Educational / Outreach	\$ 1,500,000	\$ 2,200,000	\$ 1,031,041	Various %'s from Supplemental Workbook			\$ 622,755	\$ 256,311	\$ 151,976
							\$ -	\$ -	\$ -
Total Education/ Market Transformation	\$ 2,100,000	\$ 2,800,000	\$ 1,649,418				\$ 622,755	\$ 398,537	\$ 628,126
DCEO (25% of EDA Revenue)	\$ 19,783,000	\$ 19,200,000	\$ 11,471,616	Various %'s from Supplemental Workbook			\$ 1,808,462	\$ 4,840,846	\$ 4,822,308
R&D / Emerging Technologies	\$ 1,100,000	\$ 2,377,000	\$ 1,026,174	Various %'s from Supplemental Workbook			\$ 661,171	\$ 270,419	\$ 94,584
Portfolio Administration	\$ 3,990,000	\$ 4,911,000	\$ 3,285,956	Various %'s from Supplemental Workbook			\$ 1,670,478	\$ 807,739	\$ 807,739
Measurement & Verification (M&V)	\$ 2,448,000	\$ 2,377,000	\$ 2,377,679	50%	25%	25%	\$ 1,188,840	\$ 594,420	\$ 594,420
TOTAL PORTFOLIO	\$ 81,561,000	\$ 79,256,000	\$ 63,543,475				\$ 26,224,463	\$ 20,750,340	\$ 16,568,671
Total less DCEO		\$ 60,056,000	\$ 52,071,859	DATE : 8-22-10					

ORIGINAL PLAN PLAN YEAR 2 - 6/1/09-5/31/10 ComEd Programs	Plan \$	Plan Year 2 Adjusted Spending Screen	PY2 Year End May-10	Cost Distribution in %			Cost Distribution in \$		
				Residential	SC&I	LC&I	Residential	SC&I	LC&I
Residential									
Residential Lighting Program	\$ 11,970,000	\$ 9,533,000	\$ 11,691,347				\$ 11,691,347		
APT			\$ 11,281,357	100%			\$ 11,281,357	\$ -	\$ -
Marketing/Other			\$ 409,989	100%			\$ 409,989	\$ -	\$ -
Appliance Recycling Program	\$ 4,760,000	\$ 3,471,000	\$ 3,646,603				\$ 3,646,603		
Jaco			\$ 2,966,417	100%			\$ 2,966,417	\$ -	\$ -
Marketing/Other			\$ 680,186	100%			\$ 680,186	\$ -	\$ -
Residential Multi-family "All Electric"	\$ 760,000	\$ 760,000	\$ 822,397				\$ 822,397		
Honeywell			\$ 644,914	100%			\$ 644,914	\$ -	\$ -
Nicor			\$ 172,736	100%			\$ 172,736	\$ -	\$ -
Marketing/Other			\$ 4,747	100%			\$ 4,747	\$ -	\$ -
Residential New HVAC w/Quality Installation	\$ 5,750,000	\$ 5,278,000	\$ 2,919,925				\$ 2,919,925		
Honeywell			\$ 2,773,930	100%			\$ 2,773,930	\$ -	\$ -
Marketing/Other			\$ 144,651	100%			\$ 144,651	\$ -	\$ -
IT			\$ 1,344	100%			\$ 1,344	\$ -	\$ -
Single Family Home Performance	\$ 570,000	\$ 251,000	\$ 373,341				\$ 373,341		
Honeywell			\$ 328,316	100%			\$ 328,316	\$ -	\$ -
Marketing/Other			\$ 37,528	100%			\$ 37,528	\$ -	\$ -
Nicor			\$ 7,498	100%			\$ 7,498	\$ -	\$ -
Total Residential Program Costs	\$ 23,840,000	\$ 19,293,000	\$ 19,453,613				\$ 19,453,613	\$ -	\$ -
C & I									
C & I Prescriptive/Custom	\$ 24,400,000	\$ 24,585,000	\$ 20,844,585				\$ 13,548,980	\$ 7,295,604	
KEMA			\$ 5,056,485		65%	35%	\$ -	\$ 3,286,715	\$ 1,769,770
Incentives			\$ 15,569,164		65%	35%	\$ -	\$ 10,119,957	\$ 5,449,207
Marketing/other			\$ 216,250		65%	35%	\$ -	\$ 140,563	\$ 75,688
APT / EFI			\$ 2,686		65%	35%	\$ -	\$ 1,746	\$ 940
C&I Retrocommissioning	\$ 2,420,000	\$ 2,115,000	\$ 2,036,491				\$ -	\$ -	\$ 2,036,491
Nexant			\$ 2,033,221			100%	\$ -	\$ -	\$ 2,033,221
Marketing/Other			\$ 3,270			100%	\$ -	\$ -	\$ 3,270
C&I New Construction	\$ 480,000	\$ 598,000	\$ 578,798				\$ -	\$ 289,399	\$ 289,399
ECW			\$ 485,723		50%	50%	\$ -	\$ 242,861	\$ 242,861
Incentives			\$ 86,425		50%	50%	\$ -	\$ 43,213	\$ 43,213
Marketing			\$ 6,650		50%	50%	\$ -	\$ 3,325	\$ 3,325
Total C & I	\$ 27,300,000	\$ 27,298,000	\$ 23,459,874				\$ 13,838,380	\$ 9,621,494	
Demand Response (A/C Cycling)	\$ 1,000,000	\$ 1,000,000	\$ 819,145				\$ 819,145		
LKHS/ Medius / Regulus			\$ 449,347	100%			\$ 449,347	\$ -	\$ -
PJM Credit			\$ (223,470)	100%			\$ (223,470)	\$ -	\$ -
Customer Incentives			\$ 298,465	100%			\$ 298,465	\$ -	\$ -
Annual Revenue Requirement			\$ 294,803	100%			\$ 294,803	\$ -	\$ -
EIO Interval Data Profiler & Energy Star	\$ 600,000	\$ 600,000	\$ 618,377				\$ -	\$ 142,227	\$ 476,150
Invaluable Technologies/Calico			\$ 481,300		23%	77%	\$ -	\$ 110,699	\$ 370,601
Mad Dash Inc			\$ 98,138		23%	77%	\$ -	\$ 22,572	\$ 75,566
Marketing			\$ 38,939		23%	77%	\$ -	\$ 8,956	\$ 29,983
DCEO (25% of EDA Revenue)	\$ 19,783,000	\$ 19,200,000	\$ 11,471,616				\$ 1,808,462	\$ 4,840,846	\$ 4,822,308
Actual Invoices			\$ 11,471,616	Various %'s from Supplemental Workbook			\$ 1,808,462	\$ 4,840,846	\$ 4,822,308
TOTAL Program Costs	\$ 72,523,000	\$ 67,391,000	\$ 55,822,624				\$ 22,081,219	\$ 18,821,453	\$ 14,919,952
TOTAL LESS DCEO Programs	\$ 52,740,000	\$ 48,191,000	\$ 44,351,008				\$ 20,272,757	\$ 13,980,606	\$ 10,097,645

DATE : 8-22-10

ORIGINAL PLAN PLAN YEAR 2 - 6/1/09-5/31/10 ComEd Programs	Plan \$	Plan Year 2 Adjusted Spending Screen	PY2 Year End May-10	Cost Distribution in %			Cost Distribution in \$		
				Residential	SC&I	LC&I	Residential	SC&I	LC&I
Educational / Outreach	\$ 1,500,000	\$ 2,200,000	\$ 1,031,041				\$ 622,755	\$ 256,311	\$ 151,976
Opower			\$ 214,469				\$ 214,469	\$ -	\$ -
Opower T&M			\$ 191,638	100%			\$ 191,638	\$ -	\$ -
Opower IT (50/50)			\$ 19,357	100%			\$ 19,357	\$ -	\$ -
Opower Evaluation (50/50)			\$ 3,474	100%			\$ 3,474	\$ -	\$ -
Community Energy Challenge			\$ 208,670				\$ 104,335	\$ 104,335	\$ -
Community Energy Challenge Shaw (50/50)			\$ 124,653	50%	50%		\$ 62,326	\$ 62,326	\$ -
Community Energy Challenge Mktig (50/50)			\$ 7,954	50%	50%		\$ 3,977	\$ 3,977	\$ -
Community Energy Challenge Evaluation (50/50)			\$ 26,063	50%	50%		\$ 13,031	\$ 13,031	\$ -
Community Energy Challenge prize (50/50)			\$ 50,000	50%	50%		\$ 25,000	\$ 25,000	\$ -
									\$ -
TOTAL MARKETING COSTS			\$ 607,903				\$ 303,952	\$ 151,976	\$ 151,976
General Marketing Costs			\$ 385,339	50%	25%	25%	\$ 192,670	\$ 96,335	\$ 96,335
Educational/Outreach Marketing			\$ 222,564	50%	25%	25%	\$ 111,282	\$ 55,641	\$ 55,641
									\$ -
R&D / Emerging Technologies	\$ 1,100,000	\$ 2,377,000	\$ 1,026,174				\$ 661,171	\$ 270,419	\$ 94,584
Opower			\$ 214,469				\$ 214,469	\$ -	\$ -
Opower T&M			\$ 191,638	100%			\$ 191,638	\$ -	\$ -
Opower IT (50/50)			\$ 19,357	100%			\$ 19,357	\$ -	\$ -
Opower Evaluation (50/50)			\$ 3,474	100%			\$ 3,474	\$ -	\$ -
Community Energy Challenge			\$ 208,670				\$ 104,335	\$ 104,335	\$ -
Community Energy Challenge Shaw (50/50)			\$ 124,653	50%	50%		\$ 62,326	\$ 62,326	\$ -
Community Energy Challenge Mktig (50/50)			\$ 7,954	50%	50%		\$ 3,977	\$ 3,977	\$ -
Community Energy Challenge Evaluation (50/50)			\$ 26,063	50%	50%		\$ 13,031	\$ 13,031	\$ -
Community Energy Challenge prize (50/50)			\$ 50,000	50%	50%		\$ 25,000	\$ 25,000	\$ -
Memberships/Dues/Subscriptions			\$ 308,289				\$ 154,145	\$ 77,072	\$ 77,072
Esource - EE00486			\$ 137,910	50%	25%	25%	\$ 68,955	\$ 34,478	\$ 34,478
EPRI Membership			\$ 80,750	50%	25%	25%	\$ 40,375	\$ 20,188	\$ 20,188
Distributed Energy Financial Group			\$ 7,500	50%	25%	25%	\$ 3,750	\$ 1,875	\$ 1,875
Consortium for Energy Efficiency 2009 Dues			\$ 74,171	50%	25%	25%	\$ 37,086	\$ 18,543	\$ 18,543
Association of Energy Professionals			\$ 5,000	50%	25%	25%	\$ 2,500	\$ 1,250	\$ 1,250
General R&D Costs/ AV			\$ 2,958	50%	25%	25%	\$ 1,479	\$ 740	\$ 740
Residential R&D			\$ 153,199				\$ 153,199	\$ -	\$ -
Best Buy Pilot			\$ 69,705	100%			\$ 69,705	\$ -	\$ -
Honeywell Blower Door Project			\$ 83,494	100%			\$ 83,494	\$ -	\$ -
Commercial & Industrial R&D									
Direct Install Program			\$ 71,500		100%			\$ 71,500	
Midwest Energy Efficiency Alliance (MEEA)			\$ 70,048	50%	25%	25%	\$ 35,024	\$ 17,512	\$ 17,512
Portfolio Administration	\$ 3,990,000	\$ 4,911,000	\$ 3,285,956				\$ 1,670,478	\$ 807,739	\$ 807,739
Labor (w/P&B) and Expenses			\$ 2,315,400	50%	25%	25%	\$ 1,157,700	\$ 578,850	\$ 578,850
Portfolio Consultant Expense			\$ 21,454	50%	25%	25%	\$ 10,727	\$ 5,363	\$ 5,363
Legal Fees			\$ 52,783	50%	25%	25%	\$ 26,391	\$ 13,196	\$ 13,196
Tracker System			\$ 297,523				\$ 148,761	\$ 74,381	\$ 74,381
Frontier			\$ 211,147	50%	25%	25%	\$ 105,573	\$ 52,787	\$ 52,787
Invaluable Tech/Calico			\$ 86,376	50%	25%	25%	\$ 43,188	\$ 21,594	\$ 21,594
Midwest Energy Efficiency Alliance (MEEA)			\$ 1,375	50%	25%	25%	\$ 688	\$ 344	\$ 344
DS More Intrgal Technologies			\$ 26,384	50%	25%	25%	\$ 13,192	\$ 6,596	\$ 6,596
Metropolitan Mayors Caucus			\$ 55,000	100%			\$ 55,000	\$ -	\$ -
Market Assessment Studies Cadmus/ABT			\$ 516,038	50%	25%	25%	\$ 258,019	\$ 129,009	\$ 129,009
Measurement & Verification (M&V)	\$ 2,448,000	\$ 2,377,000	\$ 2,377,679				\$ 1,188,840	\$ 594,420	\$ 594,420
Summit Blue- year 2	\$ 2,448,000		\$ 760,442	50%	25%	25%	\$ 380,221	\$ 190,110	\$ 190,110
Summit Blue - year 1 remaining			\$ 374,430						
Ameren Reimbursement - PY1			\$ (89,984)						
Ameren Reimbursement - PY2			\$ (19,704)	50%	25%	25%	\$ (9,852)	\$ (4,926)	\$ (4,926)
Evaluation Carryforward to PY3			\$ 1,636,941	50%	25%	25%	\$ 818,471	\$ 409,235	\$ 409,235
Total Non-Program Costs	\$ 9,038,000	\$ 11,865,000	\$ 7,720,851				\$ 4,143,244	\$ 1,928,888	\$ 1,648,719

DATE : 8-22-10

ICC Docket No. 10-0520

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("Staff") Data Requests**

JLH 5.01

Dated Received: July 25, 2011

Date Served: August 22, 2011

REQUEST NO. JLH 5.01:

The Act requires the Company to;

“Provide for an annual independent evaluation of the performance of the cost-effectiveness of the utility's portfolio of measures and the Department's portfolio of measures...”. (220 ILCS 5/8-103(f)(7)).

Referring to the “Measure Reports” that ComEd filed in Docket No. 10-0520 to comply with this requirement, the “Summary Report” summarizes the cost-effectiveness results for each of the programs and the portfolio as a whole with a portfolio-level TRC value of 2.84. (Summary Report at 22-24). Within each individual “Measure Report”, some of the details on input values used in the cost-effectiveness calculations are provided and are provided in the tables below for easy reference when answering this data request.

For each program listed below, please provide responses to the following:

- a) explain the basis upon which ComEd elected to provide the measure life value used in the cost-effectiveness calculations;
- b) explain the basis for that particular measure life value that ComEd elected to have the evaluation contractor use. Significant detail and justification is requested for all energy efficiency programs, including the demand response program;
- c) provide the specific page number references to the Commission-approved energy efficiency Plan 1 from Docket No. 07-0540 that in ComEd's opinion requires or allows the specific measure life value to be used;
- d) explain why ComEd chose to update some measure life values and not others, especially for those that ComEd cannot provide a specific citation to from its EE Plan 1;
- e) explain why the values the Company chose not to update are still valid to use on an ex-post cost-effectiveness evaluation basis;
- f) explain in detail how the utility administration and implementation costs were determined for each program;

- g) explain in detail and provide the calculations regarding how the utility incentive costs were determined for each program, significant detail and justification is requested for all energy efficiency programs, especially the direct install programs¹; and
- h) explain and provide the calculations for the participant contribution to incremental measure costs.

Programs:

- i. Business Prescriptive or Business Standard (Measure Report #8, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 66-67
- ii. Business Custom (Measure Report #6, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 53-55
- iii. C&I Retro-Commissioning (Measure Report #4, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 38-39
- iv. C&I New Construction (Measure Report #5, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 35-37
- v. Central Air Conditioning Cycling, Demand Response Program (Measure Report #11, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 37-38
- vi. All-Electric Efficiency Upgrade (Multi-Family All-Electric Sweep) (Measure Report #10, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 37-38
- vii. All-Electric Single Family Home Energy Performance Tune-Up (Single Family Home Performance) (Measure Report #2, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), p. 55
- viii. Central Air Conditioning Efficiency Services (“CACES”) (Measure Report #7, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 51-52
- ix. Residential Energy Star Lighting (Measure Report #3, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 113-114
- x. Appliance Recycling (Measure Report #9, Filed March 4, 2011 on e-Docket in Docket No. 10-0520), pp. 42-44

¹ For example, explain and show in a spreadsheet how this cost was calculated. Indicate whether the time and material cost of the items installed were used or whether the utility incentive cost calculation included additional implementation costs in the incentive costs. Provide the per unit cost for each item installed along with number of items, and cost for audit and number of audits. Please provide sufficient justification for the exact approach taken in calculating the utility incentive cost calculations. Explain the impact on the IL TRC test if the utility incentive cost % of the total costs increases and the utility administration and implementation costs % of the total costs decreases proportionally, ceteris paribus.

Table 3.3. Cost Effectiveness of ComEd Portfolio

Summary, pp. 22-24

Program	Ex-Post Net (MWh)	Illinois Total Resource Cost Test
Residential Energy Star Lighting	202,557	5.84
Appliance Recycling	32,624	3.97
All-Electric Efficiency Upgrade	1,840	2.5
Central Air Conditioning Cycling	NA	3.73
ComEd TOTAL	456,151	2.84
<i>Note: The Central Air Conditioning Cycling program saves 13.6 MW of demand, but no energy.</i>		

Table 0-6. Inputs to DSMore Model for Retro-Commissioning Program

Item	Value Used
Measure Life	3 years
Participants	14
Annual Gross Energy Savings	7,174 MWh
Gross Coincident Peak Savings	1.1 MW
Net-to-Gross Ratio	92%
Utility Administration and Implementation Costs	\$152,060
Utility Incentive Costs	\$1,382,590
Participant Contribution to Incremental Measure Costs	\$20,089

Table 3-73. Inputs to DSMore Model for Residential Energy Star® Lighting Program

Item	Value Used
Measure Life	9 years
Participants	8,727,246
Annual Gross Energy Savings	360,159 MWh
Gross Coincident Peak Savings	323 MW
Net-to-Gross Ratio	58%
Utility Administration and Implementation Costs	\$207,844
Utility Incentive Costs	\$9,074,820
Participant Contribution to Incremental Measure Costs	\$2.40

Table 3-31. Inputs to DSMore Model for All Electric Single Family Home Energy Performance Tune-U Program

Item	Value Used
Measure Life	9 years
Participants	760
Annual Gross Energy Savings	721MWh
Gross Coincident Peak Savings	0.1 MW
Net-to-Gross Ratio	72% to 102%
Utility Administration and Implementation Costs	\$66,431
Utility Incentive Costs	\$198,628
Participant Contribution to Incremental Measure Costs	\$25

Table 3-3. Inputs to DSMore Model for Central Air Conditioning Cycling Program

Item	Value Used
Measure Life	15 years
Participants	9,418
Annual Gross Energy Savings	13.55 MWh
Gross Coincident Peak Savings	13.5 MW
Net-to-Gross Ratio	100%
Utility Administration and Implementation Costs	\$47,300
Utility Incentive Costs	\$74,995
Participant Contribution to Incremental Measure Costs	\$0

Table 3-18. Inputs to DSMore Model for All-Electric Efficiency Upgrade Program

Item	Value Used
Measure Life	9 years
Participants	4,219
Annual Gross Energy Savings	2,976 MWh
Gross Coincident Peak Savings	0.2 MW
Net-to-Gross Ratio	80%
Utility Administration and Implementation Costs	\$76,500
Utility Incentive Costs	\$456,884
Participant Contribution to Incremental Measure Costs	\$0

Table 3-22. Inputs to DSMore Model for Residential Appliance Recycling Program

Item	Value Used
Measure Life	8 years
Participants	25,735
Annual Gross Energy Savings	43,788 MWh
Gross Coincident Peak Savings	7.3 MW
Net-to-Gross Ratio	72% to 82%
Utility Administration and Implementation Costs	\$274,923
Utility Incentive Costs	\$641,200
Participant Contribution to Incremental Measure Costs	\$0

Table 3-15. Inputs to DSMore Model for C&I Prescriptive Program

Item	Value Used
Measure Life	11 years
Participants	1,739
Annual Gross Energy Savings	259,093 MWh
Gross Coincident Peak Savings	45.1 MW
Net-to-Gross Ratio	74%
Utility Administration and Implementation Costs	\$339,527
Utility Incentive Costs	\$13,179,269
Participant Contribution to Incremental Measure Costs	\$41,679

Table 3-13. Inputs to DSMore Model for Central Air Conditioning Efficiency Services Program

Item	Value Used
Measure Life	10 years
Participants	16,293
Annual Gross Energy Savings	1,964 MWh
Gross Coincident Peak Savings	3.82 MW
Net-to-Gross Ratio	100%
Utility Administration and Implementation Costs	\$275,503
Utility Incentive Costs	\$1,652,515
Participant Contribution to Incremental Measure Costs	\$0

Table 3-12. Inputs to DSMore Model for C&I Custom Program

Item	Value Used
Measure Life	11 years
Participants	340
Annual Gross Energy Savings	22,697 MWh
Gross Coincident Peak Savings	2.9 MW
Net-to-Gross Ratio	76%
Utility Administration and Implementation Costs	\$84,881
Utility Incentive Costs	\$2,704,415
Participant Contribution to Incremental Measure Costs	\$24,914

Table 3-9. Inputs to DSMore Model for Nonresidential New Construction Program

Item	Value Used
Measure Life	15 years
Participants	16
Annual Gross Energy Savings	1,368 MWh
Gross Coincident Peak Savings	0.3 MW
Net-to-Gross Ratio	59%
Utility Administration and Implementation Costs	\$77,506
Utility Incentive Costs	\$86,425
Participant Contribution to Incremental Measure Costs	\$45,000

RESPONSE:

ComEd objects to this data request because it is vague and ambiguous, overbroad, unduly burdensome and to the extent that it seeks to impose obligations not otherwise imposed by applicable law or Commission order, calls for a legal conclusions, or requests information that is neither relevant nor likely to lead to the discovery of admissible evidence. Without waiving these objections or any of its General Objections, ComEd states the following.

As an initial matter, the measure life values are the same values ComEd used in its Commission-approved 2008 – 2010 Energy Efficiency and Demand Response Plan (“Plan”). *See Commonwealth Edison Co.*, ICC Docket No. 07-0540 Final Order, at 11 (“Order”), Appendices. These measure life values are used in determining the cost-effectiveness of the measures included in ComEd’s Plan, and were uncontested. Order at 11. Neither the Order nor Section 8-103 of the Public Utilities Act requires that ComEd update the measure life values during PY2. Moreover, ComEd believes that the measure life values used in the Plan, which were derived from California’s Database for Energy Efficiency Resources (“DEER”), are as reliable and pertinent as any values available. These values were developed from a number of “persistence” studies conducted in California in the mid-to-late 1990’s. Since that time, California has ceased conducting such studies, and ComEd is not aware of any other jurisdictions undertaking such efforts. DEER was the primary source of measure life data for the measures, and DEER 2005 was the most recent version available when the plan was developed in September 2007.

In addition, as quoted in the request, Section 8-103 “[p]rovide[s] for an annual independent evaluation of the performance of the cost-effectiveness of the utility's portfolio of measures and the Department's portfolio of measures...”. 220 ILCS 5/8-103(f)(7). Accordingly, all program inputs to the DSMore analysis, including measure life values, were presented to the independent evaluator, Navigant Consulting. Navigant did not recommend that any of the measure life values be revised.

ComEd further responds to each individual subpart as follows:

- a) For the majority of programs, an average measure life value for the entire program was used in the ex post analysis, which was based on the individual measure life values in the program, which were used in the Order. ComEd reviewed the measures in the program and calculated an average measure life for the program analysis for the TRC. ComEd did not attempt to use individual measure life values in its ex post analysis of TRC. For the CACES program, ComEd used average lives for subparts of the overall program, i.e. tune-up services, quality installations, and quality installation of high efficiency units (SEER 14+). For the Appliance Recycling Program, DEER database values were used.
- b) For all programs, ComEd based the measure life for the program analysis on the best available data, starting with the values used in the first Plan.
- c) For all programs, ComEd’s ex-post analysis differs from the Plan analysis, which was built up from individual measures and measure lives. As previously stated, ComEd used an average measure life to represent the entire program in the ex-post analysis. As noted above, nothing in the Order precludes ComEd from using the measure life values in the Order in the ex-post analysis.
- d) As previously explained, for all programs, ComEd did not update individual measure lives, but rather calculated average measure lives on a program level for the cost-effectiveness analysis.
- e) See ComEd’s response to subpart (d).
- f) For all programs, as invoices were received, ComEd’s energy efficiency planning & measurement team worked with the program implementation team to assign costs across the various programs. Within each program, costs were assigned across the various cost categories (e.g., incentives, contractor). Cost allocations were finalized at the end of the Plan year. At year’s end, ComEd also estimated allocations of internal labor costs across programs and these costs were then added to the program totals. Please note that for cost-effectiveness analysis, non-Rider EDA costs were included in the analysis.
- g) For five (5) of the programs, incentive costs are the payment to customers through the program. This would include the following programs – Business Prescriptive, Business Custom, C&I New construction, AC Cycling (net of PJM payments), and Appliance Recycling. For the two direct install programs, Multi-Family All-Electric and Single Family Home Performance, the incentive costs are identified on contractor invoices as fully-weighted Material and Labor to Install Energy Efficient Items at pre-negotiated prices that include cost of material and overhead.. For the CACES program, incentive costs are payments to contractors, but for TRC calculations they are included as implementation costs for all CACES measures. The CACES incentive costs should result in higher-valued services for the customer

or lower costs, but are not directly recognizable by the customer and therefore were not included as a TRC incentive. For C&I Retro-commissioning, incentives are the payments for the engineering studies done on behalf of customers. For the Residential Lighting program, incentive costs are paid directly to the retailers and the savings flow through to the customer as price reductions.

- h) For all programs, the “participant contribution to incremental measures” costs listed in the above table are on a cost per customer basis. This cost is assumed to be the incremental project cost, net of the incentive.