

ICC Docket No. 11-0772

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 3.01 – 3.04**

Date Received: February 8, 2012

Date Served: February 13, 2012

REQUEST NO. AG 3.01:

Provide the following information for each month and a total for each annual results for 2010, 2011, and 2012 to date:

- a.) Number of disconnection notices issued to residential customers;
- b.) Number of field orders issued to physically disconnect a residential customer meter for nonpayment;
- c.) Number of actual disconnections of residential customer meters for nonpayment that were implemented;
- d.) The average amount due on disconnection notices for Item B (field orders issued for disconnection for nonpayment);
- e.) The average amount due on disconnection notices for Item C (actual disconnections for nonpayment).

RESPONSE:

ComEd objects to this request because it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence in this docket. Without waiving this objection or any of its General Objections, ComEd states as follows. The calculations of the baseline values and annual performance goals required by Section 16-108.5(f) of the Public Utilities Act and reflected in ComEd's Multi-Year Performance Goals Plan (ComEd Ex. 1.0 Corrected) do not incorporate the data sought in this request.