

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 2.01 – 2.15**

Date Received: November 16, 2011**Date Served: November 28, 2011****REQUEST NO. AG 2.11:**

Did the Company modify its accounting for the repair allowance deduction pursuant to Revenue Procedure 2011-43, regarding the deduction and capitalization of expenditures under Internal Revenue Code Section 263(a)? If the response is affirmative, please provide the effect of such modification on the annual repair allowance deduction and any Section 481(a) ("catch-up") adjustment to taxes payable. If the response is negative, please explain why the Company's accounting for the repair allowance deduction was not modified.

RESPONSE:

The Company intends to modify its accounting for the repair deduction pursuant to Revenue Procedure 2011-43 for tax year 2011 and has thus reflected the estimated results of such adoption, including the Section 481 (a) adjustment, in its 3rd Quarter 2011 Form 10-Q. The Company's repair deduction was not modified as of December 31, 2010 because the Treasury Department did not issue guidance regarding the deduction until the 3rd Quarter of 2011.

The Section 481(a) ("catch-up") adjustment and the annual repairs deduction for tax year 2011 are estimated to be approximately \$600 million and \$200 million respectively. The effect of the annual repairs deduction and Section 481(a) ("catch up") adjustment will be reflected in ComEd's formula rate filing for the year ending December 31, 2011.

OFFICIAL FILE
I.C.C. DOCKET NO. 11-0721
AG Exhibit No. 2
Witness Fruene
Date 3.7.12 Reporter CC