

Commonwealth Edison Company
Docket No. 11-0721
CUB Exhibit 3.1
Copies of Applicant's Responses to Discovery Requests
Referenced in the Rebuttal Testimony of
Ralph C. Smith

Discovery Request	Subject	Confidential	No. of Pages	Page No.
AG-10.09	There are no specific performance goals associated with the restricted stock program	No	2	2 - 3
AG-10.01(c)	ComEd acknowledged that the Commission and FERC each establish their own policies for allocation methods	No	1	4
AG-10-02	Citations to two FERC Opinion/Orders (dated August 3, 1978; October 30, 1978; and July 29, 1988) that ComEd relies on for its proposed changes to the allocation methods (without voluminous attachment)	No	6	5 - 10
TEE-11.01	Increasing the net income limiter resulted in a increased AIP adjusted total expense and capitalized amounts included in the revenue requirement	No	2	11 - 12
AG 10.13	ComEd witness Hengtgen's calculation of the revenue requirement collection lag assuming retention of all of ComEd's aging interval midpoint and grace period assumptions, but adjusted for the uncollectible factors in the form of his rebuttal testimony ComEd Exhibit 16.2	No	6	13 - 18
AG 10.17	Monthly amounts of Accounts Payable related to ComEd's Distribution CWIP amounts that were not accruing AFUDC	No	4	19 - 22
AG 4.11 Supplemental	Amount of donations made by Exelon companies for years 2006-2010	No	2	23 - 24
AG 7.08(a)(c)	ComEd is not seeking recovery of donations in its FERC Formula Rate; Donations are excluded in the determination of PECO's revenue requirement	No	1	25
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OFFICIAL FILE

ICC DOCKET NO. 11-0721
CUB Exhibit No. 3.1
Witness Ralph Smith
Date 3/21/12 Reporter TD

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 10.01 – 10.17
Date Received: February 14, 2012
Date Served: February 20, 2012**

REQUEST NO. AG 10.09:

Referring to ComEd Exhibit 13.0, page 32, lines 426-430. At the referenced testimony, Mr. Fruehe asks the question, "Has ComEd not provided the goals associated with the restricted stock program?" and his answer merely states, "As I have explained above, the goal of the program is retention of key individuals." Please provide:

- a. A complete and detailed statement of each applicable goal that impacted the award of restricted stock to any/each ComEd or affiliated company employee where the costs of such restricted stock is included in the Company's asserted revenue requirement.
- b. Calculations of actual performance, compared to each goal in your response to part (a), so as to reveal how the amounts of awarded restricted stock was determined.
- c. Calculations supporting the entries made upon ComEd's books, indicating how the number of awarded shares of stock were translated into recorded expense and or capitalized cost amounts, indicating the cost per share used in each such entry.

RESPONSE:

- a. As discussed in ComEd Ex. 13.0 at 18:377 – 19:397, the restricted stock program is a form of deferred compensation that is not tied to the attainment of any particular goals. Similar to receiving a pay raise at the beginning of the year, with the exception of those whose prior year performance was below expectations, each key manager receives a restricted stock grant as deferred compensation. One third of the grant is paid to the key manager each year over a three year period. The program's objective is retention of key employees who are critical to ComEd's success in serving customers reliably and efficiently. See also ComEd's Data Request Response to subpart (c) of AG 1.15.
- b. As discussed in ComEd's response to part a, there are no specific, company-wide performance goals associated with the restricted stock program, thus the calculations cannot be performed. As described in ComEd Ex. 4.9, page 21, the amounts of annual restricted stock grants are determined by the Exelon Compensation Committee based upon competitive market trends in compensation of similar positions in high-performing energy services and capital-intensive general industry companies and the current value of Exelon Stock.
- c. See the attachment labeled as AG 10.09_Attach 1.

Commonwealth Edison Company
 Summary of 2010 ComEd Restricted Stock Compensation Cost and Expense

Plan Year	Shares granted for which expense was recognized during 2010 (3)				Grant date fair value			2010 Total Cost				2010 Expense (4)				2010 Capitalized Cost			
	Retirement eligible (RE) at grant	Became RE during vesting (1)	Not RE	Total	Stock Price	forfeiture rate (2)	Net stock price	RE at grant	Becomes RE during vesting	Not RE (5)	Total	RE at grant	Becomes RE during vesting	Not RE	Total	RE at grant	Becomes RE during vesting	Not RE	Total
2008	N/A	3,890	27,315	31,205	\$ 73.29	5%	\$ 69.63	N/A	\$ 93,751	\$ 633,940	\$ 727,691	N/A	\$ 63,938	\$ 432,347	\$ 496,286	N/A	\$ 29,813	\$ 201,593	\$ 231,406
2009	N/A	9,600	37,894	47,494	\$ 56.51	5%	\$ 53.68	N/A	\$ 257,621	\$ 678,107	\$ 935,728	N/A	\$ 175,698	\$ 462,469	\$ 638,166	N/A	\$ 81,923	\$ 215,638	\$ 297,561
2010	16,170	12,590	24,910	53,670	\$ 46.09	5%	\$ 43.79	\$ 745,275	\$ 385,116	\$ 363,566	\$ 1,493,956	\$ 508,278	\$ 262,649	\$ 247,952	\$ 1,018,878	\$ 236,998	\$ 122,467	\$ 115,614	\$ 475,078
Total	16,170	26,080	90,119	132,369				\$ 745,275	\$ 736,488	\$ 1,675,613	\$ 3,157,376	\$ 508,278	\$ 502,285	\$ 1,142,768	\$ 2,153,330	\$ 236,998	\$ 234,203	\$ 532,845	\$ 1,004,045

Notes

- (1) Only includes shares for individuals with expense during 2010. If individuals were retirement eligible prior to January 1, 2010, their shares are not included in the counts as those shares were fully expensed prior to January 1, 2010.
- (2) The forfeiture rate is not applied to individuals that are retirement eligible at grant. It is only applied to individuals that are not retirement eligible and therefore may forfeit the grant.
- (3) Shares granted are based on the total shares as of 12/31/2010. Immaterial differences may arise from individuals moving to or from ComEd during the year.
- (4) Expense is calculated by multiplying the 2010 cost by (1 - 31.8%) as 31.8% of the cost was capitalized during 2010.
- (5) Amount is calculated as (Net stock price * # of shares granted to Non-Retirement Eligible Individuals) / 3 year term of the grant.

ICC Docket No. 11-0721

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

AG 10.01 – 10.17

Date Received: February 14, 2012

Date Served: February 21, 2012

REQUEST NO. AG 10.01:

Referring to ComEd Exhibit 11.0, page 14, lines 282-290, please provide the following additional information:

- a. Identify each of the "policies for functionalizing assets and costs of the transmission portion of these facilities" that Mr. Hemphill or ComEd believe have been established by the FERC and that are different from the cost functionalization policies that were employed by the ICC in Docket No. 10-0467.
- b. Please identify with specificity and provide supporting citations for each of the FERC policies for functionalizing assets and costs that Mr. Hemphill is referencing. What FERC publications, rate orders or other authority exists to confirm the FERC policies that are believed to exist?
- c. Is it Mr. Hemphill's opinion or belief that the Illinois Commission should defer to the FERC policies regarding policies for functionalizing assets and costs, rather establishing its own policies regarding such matters?

Explain and provide copies of all support for your response to part (c) of this data.

RESPONSE:

- a. Dr. Hemphill testifies about the principle that functionalization must be consistent, not about any particular asset or cost. His testimony is that, regardless of the specific asset or cost, "[i]f the Commission were to adopt a functionalization different from FERC's, it would result in a direct conflict between federal and state determinations of what costs of delivery are distribution [and] ... could also trap costs in a way that renders them unrecoverable, even when ... they are prudently incurred and reasonable in amount." (Hemphill Reb., ComEd Ex. 11.0, 14:288 – 15:292). Dr. Hemphill makes very clear that "[t]he rebuttal testimony of Ms. Kathryn Houtsma (ComEd Ex. 12.0) discusses this issue in the context of particular costs and allocations." (*Id.* at 15:299-300). Please *see* also ComEd's Data Request Response to AG 10.02.
- b. *See* ComEd's response to subpart (a), above.
- c. There is no question of FERC and the Commission each "establishing its own policies." An individual delivery asset or cost is functionalized as Distribution, Transmission, or some combination thereof. The proper functionalization does not change depend upon whether the question is asked in Illinois or Washington, D.C. Should there be a disagreement between the FERC and the Commission, the question of supremacy is a legal one, and ComEd objects to providing "copies of all support" for a legal argument in response to a data request. However, subject to that Objection, ComEd notes the AG could start its research with the United States Constitution, Article VI, Clause 2, which supports ComEd's position.

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 10.01 – 10.17**

Date Received: February 14, 2012

Date Served: February 20, 2012

REQUEST NO. AG 10.02:

Referring to ComEd Exhibit 12.0, page 27, line 590, please provide the following additional information regarding the Company's prior method used to functionalize General Plant Account 389 and 390 asset costs:

- a. Explain how the "property usage analysis" was prepared, indicating each category or element of property that was separately analyzed and describing the analysis approach that was used for each such category/element.
- b. Provide a complete copy of the Company's last completed "property usage analysis" including all reports, workpapers, correspondence and other documents associated with such efforts.
- c. Explain whether and why a "property usage analysis" approach is believed to be unacceptable for use in determining ComEd's formula transmission rates.
- d. Provide complete copies of all reports, analyses, FERC regulations, FERC Orders and other information associated with or supportive of your response to part (c).

RESPONSE:

- a. The "property usage analysis" was prepared as follows:

Initially, a voluminous listing of all ComEd owned properties and leasehold improvements with year-end plant in service balances in account 389 and 390 was queried and then summarized. A representative from the Real Estate Services department visited each location to estimate the relative amount of square footage occupied by each functional class at each location, as well as the amount of square footage occupied by employees performing combined functions. The listing was further divided into two parts, owned property and leasehold improvements.

The owned property square footage was then summarized by Transmission, Transmission and Distribution combined, Customer Operations and Other. Transmission and Distribution combined square footage was then allocated using a modified wages & salaries allocator percentage separately calculated using only Transmission and Distribution wages. Using total square footages, an overall percentage was calculated by functional class and applied to the total plant in service and accumulated reserve balances for owned properties.

SUMMARY

As of December 31, 2009

ComEd Amortized General Plant (A)	Gross Plant (B)	Percentage Allocation to Function		
		Transmission (C)	Distribution (D)	Customer (E)
Land and Land Rights - Acct. 389: (page 3) General Plant Land in Fee	\$ 8,631,709	17.5%	69.3%	13.2%
Leasehold Improvements - Acct. 390: (page 2) General Plant Structures & Improvements	\$ 242,629,949	17.5%	69.3%	13.2%
Leasehold Improvements - Acct. 390: (page 2)				
Two Lincoln Centre	\$ 5,685,255	17.1%	61.6%	21.3%
Three Lincoln Centre	9,774,902	17.1%	61.6%	21.3%
Customer Care Center	4,314,871	0.0%	0.0%	100.0%
Belvidere	188,700	18.6%	81.4%	0.0%
Central Mail Facility	1,860,207	18.6%	81.4%	0.0%
Channahon	121,843	47.7%	52.3%	0.0%
Chicago Loop Tech	175,568	18.6%	81.4%	0.0%
Harvard	14,121	18.6%	81.4%	0.0%
Libertyville	4,035,299	17.2%	75.1%	7.8%
Melrose Park Training Bldg.	1,000,347	18.6%	81.4%	0.0%
One Financial Place	4,265,345	17.5%	69.3%	13.2%
Pontiac	222,451	18.6%	81.4%	0.0%
Sandwich	1,732	18.6%	81.4%	0.0%
Sterling	263,092	18.6%	81.4%	0.0%
Woodstock	58,101	16.7%	73.1%	10.1%
 Total Account 390	 \$ 274,611,781			

Commonwealth Edison Company - 2009 Summary of Leased Properties

(A) Location	(B) Owned or Leased	(C) 2009 FERC Form 1 Balance	(D) Total Square Feet	(E) Usage of Total Space			(H) Usage of ComEd Space			
				(F) BSC	(G) ComEd	(I) Generation	(H) T&D	(I) T Only	(J) Cust Svc	(K) Other
1 Corp Ofc - Aurora Hdq - 2001 Aucutt Rd.	Owned	3,781,910	25,863	0	25,863	0	19,317	0	5,341	1,205
2 Corp Ofc - Barrington Trailer - 541 N. Hough St.	Owned	1,116,945	1,000	0	1,000	0	1,000	0	0	0
3 Corp Ofc - Bolingbrook Hdq - 1040 N. Janes Ave.	Owned	8,961,570	32,815	0	32,815	0	20,336	0	9,369	3,010
4 Corp Ofc - Kankakee Region - 477 S. Schuyler Ave.	Owned	1,521,657	10,014	0	10,014	0	6,621	0	3,393	0
5 Corp Ofc - Bulk Power Operations - 1 N. 301 Swift Rd.	Owned	10,477,047	28,185	0	28,185	0	0	28,185	0	0
6 Corp Ofc - Chicago Region - North - 3500 N. California Ave.	Owned	20,564,882	206,128	0	206,128	0	144,372	0	33,807	28,049
7 Corp Ofc - Chicago Region - South - 7601 S. Lawndale Ave.	Owned	12,849,693	127,351	0	127,351	0	99,844	0	15,317	12,189
8 Corp Ofc - Chicago Region - South - Transportation Bldg. - 7801 S. Lawndale Ave.	Owned	4,261,414	25,800	0	25,800	0	25,800	0	0	0
9 Corp Ofc - Chicago West Tech. - 3400 S Pulaski	Owned	1,110,528	30,600	0	30,600	0	30,600	0	0	0
10 Corp Ofc - Commercial Center - 1919 Swift Dr.	Owned	25,391,209	213,500	39,483	174,017	0	64,381	0	58,195	51,441
11 Corp Ofc - Crestwood Region - 4401 W. 135th St.	Owned	4,789,205	46,768	0	46,768	0	34,918	0	10,385	1,466
12 Corp Ofc - Crystal Lake Region - 5100 S. Rte. 31	Owned	2,658,518	14,536	0	14,536	0	13,813	0	0	723
13 Corp Ofc - Dekalb Region - 1012 S. Rte. 23	Owned	2,893,317	17,675	0	17,675	0	11,014	0	4,501	2,160
14 Corp Ofc - Dixon	Owned	3,574,179	43,847	0	43,847	0	36,766	0	6,006	1,075
15 Corp Ofc - Rockriver Hdq - 919 First St.	Owned	76,809	31,832	0	31,832	0	17,826	0	13,369	637
16 Corp Ofc - Elgin Region Hdq - 350 E. Second St.	Owned	3,204,835	22,351	0	22,351	0	19,101	0	2,953	298
17 Corp Ofc - Freeport Region Hdq - 2800 Rte. 20 W.	Owned	1,826,454	21,523	0	21,523	0	3,239	0	7,510	10,774
18 Corp Ofc - Genoa - 215 E. Railroad St. - Assoc W/DC B-17Genoa	Owned	100,822	1,616	0	1,616	0	1,616	0	0	0
19 Corp Ofc - Glenbard Region Hdq - 1 N. 423 Swift Rd.	Owned	8,028,054	93,059	0	93,059	0	84,677	0	3,616	4,766
20 Corp Ofc - Joliet Region Hdq - 1910 Briggs St.	Owned	15,094,106	193,372	0	193,372	0	180,251	0	8,998	4,123
21 Corp Ofc - Maywood DVA Area Hdqtrs - 1605 S. First Ave	Owned	5,629,281	64,090	0	64,090	0	33,908	0	7,662	2,519
22 Corp Ofc - Maywood Technical Center - 1319 S. First Ave.	Owned	25,609,000	251,800	0	251,800	0	236,256	0	500	15,044
23 Corp Ofc - Maywood Region - 1701 S. First Ave.	Owned	1,055,085	0	0	0	0	0	0	0	0
24 Corp Ofc - Mendota Reporting Center - 1607 Division	Owned	35,405	5,776	0	5,776	0	5,776	0	0	0
25 Corp Ofc - Morrison - 144339 Crosby Rd.	Owned	84,296	8,100	0	0	8,100	0	0	0	0
26 Corp Ofc - Morrison - 207 W. Market St.	Owned	4,996	2,880	0	2,880	0	2,880	0	0	0
27 Corp Ofc - Mt. Prospect - NW Region Hdq - 201 N. Arthur Ave.	Owned	4,945,062	33,730	0	33,730	0	21,669	0	6,401	5,660
28 Corp Ofc - Corporate Computer Center - 1700 Spencer Rd.	Owned	37,190,053	62,913	29,974	32,939	0	32,939	0	0	0
29 Corp Ofc - Rockford Region Hdq - 123 Energy Ave.	Owned	14,650,024	131,589	0	131,589	0	116,160	0	6,745	8,685
30 Corp Ofc - Skokie Reporting Center - 5190 Church St.	Owned	4,163,196	22,270	0	22,270	0	17,783	0	3,572	916
31 Corp Ofc - Streator Regio - 700 W. French St.	Owned	2,397,676	14,482	0	14,482	0	13,661	0	821	0
32 UNKNOWN-Miscellaneous-Obsolete-Unavailable	Owned	527,901	n/a	0	0	0	0	0	0	0
33 Corp Ofc - University Park Region Hdq - 25000 S. Governors Hwy.	Owned	12,275,638	151,940	0	151,940	0	106,893	0	12,500	32,547
34 Corp Ofc-Minonk-Oak St. N. 8Th St.	Owned	9,790	n/a	0	0	0	0	0	0	0
35 Corp Ofc-Odell-7 Mi N/Odell	Owned	211,038	n/a	0	0	0	0	0	0	0
36 Corp Ofc-O'Hare Airport Reporting Center-O'Hare Airport	Owned	164,021	n/a	0	0	0	0	0	0	0
37 Corp Ofc-Pecatonica-Pecatonica	Owned	96	n/a	0	0	0	0	0	0	0
38 Corp Ofc-Supervisory Control Center-8207 S. Halsted St.	Owned	149,073	n/a	0	0	0	0	0	0	0
39 7902-Line-Spaulding-Tollway	Owned	133,024	n/a	0	0	0	0	0	0	0
40 Corp Ofc-Harvey Training Center-305 E. Sauk Trail	Owned	40,378	n/a	0	0	0	0	0	0	0
41 EOP/JPIC Zion Station 1785 Old Skokie Blvd. Highland Park	Owned	333,519	n/a	0	0	0	0	0	0	0
42 CED-Communication Equipment Stock Location	Owned	82,742	n/a	0	0	0	0	0	0	0
43 Corp Ofc-Amboy-605 East Ave.	Owned	5,197	n/a	0	0	0	0	0	0	0
44 Corp Ofc-Rock Falls-PP1722	Owned	1,796	n/a	0	0	0	0	0	0	0
45 Corp Ofc-Rockford Hdq-300 S. Avon St.	Owned	74,982	n/a	0	0	0	0	0	0	0
46 Corp Ofc - Springfield Office - 1 W. Old State Capital Plaza	Owned	15,027	2,909	0	2,909	0	0	0	0	2,909
47 STRUCTURE-Evanston-PP1334	Owned	27,706	n/a	0	0	0	0	0	0	0
48 167-TSS-Plano-S. S. Cornells Rd. 3Qtr Mi. W. Rte. 47	Owned	95,415	n/a	0	0	0	0	0	0	0
49 660-TDC-Grace-W. S. Grace St. S. Factory Rd.	Owned	2,283	n/a	0	0	0	0	0	0	0
50 General - Mobile Reporting Center	Owned	413,989	n/a	0	0	0	0	0	0	0
51 Land	Owned	8,631,709	n/a	0	0	0	0	0	0	0
52 Totals		251,261,658	1,940,314	69,457	1,862,757	8,100	1,423,415	28,185	220,961	190,185

Percent of Total ComEd Excl. A&G Depts. 85.1% 1.7% 13.2%

SUMMARY	Sq Footage (line 52)	Sq Footage No A&G	Allocate T&D Properties (I)	Square Footage T. D&C Only	% to Allocate Owned Properties
Transmission Only	28,185	28,185	284,755	292,940	17.5%
Transmission & Distribution	1,423,415	1,423,415	-1,423,415	0	0.0%
Distribution Only	0	0	1,158,660	1,158,660	69.3%
Customer Service	220,961	220,961	0	220,961	13.2%
A&G Departments	190,195	0	0	0	0.0%
Total	1,862,757	1,672,561	0	1,672,561	100.0%

(1) Based on T&D payroll allocator, WPA-5 (also page 4 of this attachment)

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Commonwealth Edison Company - 2009 Summary of Leased Properties

Ln	(A) Location	(B) Owned or Leased	(C) 2009 FERC Form 1 Balance \$	(D) Total Square Feet	(E)-(G) Usage of Total Space			(H)-(K) Usage of ComEd Space				(L) Total
					BSC	ComEd	Generation	T&D	T Only	Cust Svc	Other	
1	BELVIDERE	Leased	188,700	8,200	0	8,200	0	8,200	0	0	0	8,200
2	CENTRAL MAIL FACILITY	Leased	1,860,207	25,840	0	25,840	0	25,840	0	0	0	25,840
3	CHANNAHON REPORTING CENTER	Leased	121,843	28,000	0	28,000	0	18,000	10,000	0	0	28,000
4	CHICAGO LOOP TECH	Leased	175,568	21,622	0	21,622	0	21,622	0	0	0	21,622
5	CUSTOMER CARE CENTER	Leased	4,314,871	58,540	0	58,540	0	0	0	58,540	0	58,540
6	HARVARD	Leased	14,121	960	0	960	0	960	0	0	0	960
7	LIBERTYVILLE	Leased	4,035,299	133,320	0	133,320	0	117,516	0	9,876	5,929	133,320
8	LINCOLN CENTRE 2	Leased	5,685,255	96,000	53,082	42,918	0	40,094	0	0	2,824	42,918
9	LINCOLN CENTRE 3	Leased	9,774,902	176,400	78,586	97,814	0	37,203	0	18,392	42,219	97,814
10	MELROSE PARK	Leased	1,000,347	22,780	0	22,780	0	22,780	0	0	0	22,780
11	ONE FINANCIAL PLACE	Leased	4,265,345	26,533	0	26,533	0	0	0	0	26,533	26,533
12	PONTIAC	Leased	222,451	4,000	0	4,000	0	4,000	0	0	0	4,000
13	SANDWICH	Leased	1,732	2,280	0	2,280	0	2,280	0	0	0	2,280
14	STERLING SERVICE CENTER	Leased	263,092	5,880	0	5,880	0	5,880	0	0	0	5,880
15	WOODSTOCK CUSTOMER CENTER	Leased	58,101	28,680	0	28,680	0	25,773	0	2,908	0	28,680

16 Totals 31,981,833 639,035 131,668 507,367 - 330,147 10,000 89,715 77,505 507,367

Allocation of Costs from Lines 1 -15, Cols H, I & J Above

Ln	Location	T Only Sq Footage	T & D Combined (1)			Total Sq Footage	Percentage by Property		
			Trans	Dist	Cust Svc		Trans	Dist	Cust Svc
17	BELVIDERE	-	1525	6675	0	8,200	18.6%	81.4%	0.0%
18	CENTRAL MAIL FACILITY (1)	-	4806	21034	0	25,840	18.6%	81.4%	0.0%
19	CHANNAHON REPORTING CENTER	10,000	3348	14652	0	28,000	47.7%	52.3%	0.0%
20	CHICAGO LOOP TECH	-	4022	17600	0	21,622	18.6%	81.4%	0.0%
21	CUSTOMER CARE CENTER	-	0	0	58,540	58,540	0.0%	0.0%	100.0%
22	HARVARD	-	179	781	0	960	18.6%	81.4%	0.0%
23	LIBERTYVILLE	-	21858	95658	9,876	127,391	17.2%	75.1%	7.8%
24	MELROSE PARK	-	4237	18543	0	22,780	18.6%	81.4%	0.0%
25	ONE FINANCIAL PLACE (2)	-	0	0	0	-	17.5%	69.3%	13.2%
26	PONTIAC	-	744	3256	0	4,000	18.6%	81.4%	0.0%
27	SANDWICH	-	424	1856	0	2,280	18.6%	81.4%	0.0%
28	STERLING SERVICE CENTER	-	1094	4786	0	5,880	18.6%	81.4%	0.0%
29	WOODSTOCK CUSTOMER CENTER	-	4794	20979	2,908	28,680	16.7%	73.1%	10.1%
30	Total Leased before Lincoln Center 2 and 3	10,000	47,030	205,820	71,323	334,173			
31	LINCOLN CENTRE 2	-	7457	32637	0	40,094	17.1%	61.6%	21.3%
32	LINCOLN CENTRE 3	-	6920	30283	18,392	55,595	17.1%	61.6%	21.3%

Percentages based on totals from Line 30

(1) Based on T&D payroll allocator. WPA-5 (also page 4 of this attachment)
 (2) Percentage based on overall owned property %

Commonwealth Edison Company
Salaries and Wages Allocators
2009 Actual
(In Dollars)

Line No.	Description	2009 Operating Expense Salaries & Wages (1) (A)	Percentage of Total 2009 Operating Expense Salaries & Wages (1) (B)	Salaries & Wages Adjusted To Exclude A&G (C)	Percentage of Total Excluding A&G (D)	Salaries & Wages Transmission & Distribution Only (2) (E)	Percentage of Transmission & Distribution To Total (2) (F)	Percentage of Distribution, Customer & Sales To Total (G)
1	Transmission	\$ 28,462,665	9.6%	\$ 28,462,665	11.4%	\$ 28,462,665	18.6%	-
2	Distribution	124,401,048	41.7%	124,401,048	49.8%	124,401,048	81.4%	56.2%
3	Customer Accounts	93,181,748	31.3%	93,181,748	37.3%	-	-	42.1%
4	Customer Service	3,827,194	1.3%	3,827,194	1.5%	-	-	1.7%
5	Sales	-	-	-	-	-	-	-
6	A&G	48,113,960	16.1%	-	-	-	-	-
7	Total	<u>\$ 297,986,615</u>	<u>100.0%</u>	<u>\$ 249,872,655</u>	<u>100.0%</u>	<u>\$ 152,863,713</u>	<u>100.0%</u>	<u>100.0%</u>
8	Applicable to Delivery Services				<u>88.6%</u>		<u>81.4%</u>	<u>100.0%</u>

Notes:

(1) Per 2009 FERC Form 1, Page 354. Excludes production component because production costs are recovered in Rider PE. Production associated costs are excluded from jurisdictional Operations and Maintenance expenses under the SAC adjustment. See WPC-1a, Lines 14 and 15.

(2) Excludes the customer component of delivery services.

ICC Docket No. 11-0721

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

TEE 11.01

Date Received: February 16, 2012

Date Served: February 22, 2012

REQUEST NO. TEE 11.01:

Referring to ComEd Ex. 4.9, page 1, provide the jurisdictional amounts by line item as if the net income limiter had not been increased from 102.9% to 112.9% in accordance with the incentive plan's CEO Discretionary Feature. Include all workpapers showing all calculations made to support the amounts.

RESPONSE:

During its final calculation of the 2010 AIP, ComEd did not perform calculations for the payout percentage of 102.9%. ComEd has provided an estimate of what the calculation would have been at the 102.9% payout level in the attachment labeled as TEE 11.01_Attach 1.

Commonwealth Edison Company
Annual Incentive Plan Costs by FERC Account
Year 2010
(In Thousands)

Line No.	Account	Description	Total	ComEd President & CEO		Jurisdictional	102.90% Estimated Calculation			
				2010 AIP	Allocator		Allocator	Allocator	Jurisdictional	
1	ComEd Annual Incentive Plan - Expense									
2	Various (1)	Handling/Clearing/Misc	\$ 1,236		78.4%	(2)	\$ 969	\$ 1,126	78.4%	\$ 883
3	416/426	Non-Utility Expenses	129		0%		-	118	0%	-
4	500-557	Production	145		0%		-	132	0%	-
5	560-573	Transmission	2,370		0%		-	2,160	0%	-
6	580-598	Distribution	9,251		100%		9,251	8,431	100%	8,431
7	901-908	Customer	8,948		100%		8,948	8,156	100%	8,156
8	920-935	Administrative and General	8,641		89.2%	(3)	7,656	7,875	89.2%	7,025
9	Total Expense		\$ 30,719				\$ 26,823	\$ 27,998		\$ 24,495
10	Remove AIP of ComEd President and CEO from A&G (3)			\$ 809	89.2%	(4)	\$ 722	\$ 737	89.2%	\$ 658
11	Adjusted Total Expense included in Revenue Requirement						\$ 26,101			\$ 23,837
12	ComEd Annual Incentive Plan - Capital/Rate Base									
13	107/108	CWIP / Accum Depr	\$ 22,515		78.4%	(2)	\$ 17,652	\$ 20,521	78.4%	\$ 16,088
14	Total AIP Included in Rate Base			\$ 22,515			\$ 17,652	\$ 20,521		\$ 16,088
16	Total AIP Cost for 2010			\$ 53,234				\$ 48,519		
17	Total AIP Included in Revenue Requirement						\$ 43,753			\$ 39,925

Notes:

- (1) Includes Accounts 163, 184 and 186.
- (2) Net Plant Allocator WPA-5, Page 2.
- (3) Salaries and Wages Allocator WPA-5, Page 1.
- (4) ComEd CEO and President incentive compensation was removed from the revenue requirement on WPC-1a, Line 15.

ICC Docket No. 11-0721

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

AG 10.01 – 10.17

Date Received: February 14, 2012

Date Served: February 21, 2012

REQUEST NO. AG 10.13:

Referring to ComEd Exhibit 16.0, page 9, lines 179-183. According to Mr. Hengtgen, "I do not agree with Mr. Brosch's opinion on the exclusion of the uncollectible amounts but have performed the necessary calculation for illustrative purposes. If the grace periods are eliminated and Mr. Brosch's estimate of the uncollectible accounts is factored into the receivable balances the weighted collection lag for ComEd increases from 32.34 days to 36.6 days." Please respond to the following:

- a. Explain whether Mr. Hengtgen believes Mr. Brosch is advocating eliminating "grace periods" in the calculations when uncollectibles are factor in and provide pinpoint citation into AG/AARP Exhibit 1.0 where such a recommendation by Mr. Brosch is believed to appear.
- b. Rather than combining elimination of grace periods with recognition of uncollectibles, please provide Mr. Hengtgen's calculation of the revenue collection lag assuming retention of all of ComEd's aging interval midpoint and grace period assumptions, but adjusted for uncollectible factors in the form of ComEd Ex. 16.2.

RESPONSE:

- a. Mr. Hengtgen did not state that Mr. Brosch is advocating eliminating grace periods in the calculation of the collection lag when uncollectible amounts are factored into the calculation. Mr. Hengtgen's understanding of Mr. Brosch's testimony is that, among other things, he is advocating the elimination of uncollectible amounts in the calculation and that he has criticized the use of the grace period assumptions used by ComEd. The referenced testimony in ComEd Ex. 16.0, page 9, lines 176-194 merely shows an illustrative calculation of the impact on the collection lag when uncollectible amounts (as proposed by Mr. Brosch) are eliminated and the grace period assumptions used by ComEd are also eliminated.
- b. See the attachment labeled as AG 10.13_Attach 1. As requested this calculation of the collection lag includes the retention of all of ComEd's aging interval midpoint and grace period assumptions but also includes the uncollectible impacts calculated by Mr. Brosch and referenced in his testimony.

Commonwealth Edison Company
Recalculation of Collection Lag

Summary		
Line No.	Lag (A)	Number of Days (B)
1	Service Lag	15.21 No change from Direct
2	Billing Lag	2.06 No change from Direct
3	Collections Lag - recalculated	27.17 Change due to inclusion of Brosch uncollectible impact
4	Payment Processing Lag	0.85 No change from Direct
5	Bank Float	0.79 No change from Direct
6	Total Revenue Lag	46.08

Collection Lag

	Weighted Days	Average Monthly \$ Amounts	Weighted \$ Amounts	Weighted Days
27 Residential	26.30818	249,585,844	0.6454	16.98029
28 SCI	33.85591	97,528,802	0.2522	8.53889
29 LCI	18.70998	26,642,049	0.0689	1.28907
30 Railroad	3.33360	1,449,000	0.0037	0.01249
31 Street Lighting	14.49698	6,742,490	0.0174	0.25277
32 Public Authority	0.11415	748,129	0.0019	0.00022
33 Government	8.86638	3,996,135	0.0103	0.09163
34 Total		386,692,449	1.0000	27.16536

1 13 Month Average Receivable Balances

	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365	Total
3 Residential	176,179,847	33,616,996	15,829,447	8,679,102	5,060,645	3,227,084	2,241,815	2,656,360	2,094,548	249,585,844
4 SCI	72,098,740	11,237,492	4,298,877	2,367,287	1,604,693	1,240,621	1,055,395	1,671,994	1,953,703	97,528,802
5 LCI	21,061,859	3,730,014	1,267,646	373,596	157,982	59,030	14,369	(13,668)	(8,779)	26,642,049
6 Railroad	609,277	534,854	298,057	5,042	1,770	0	0	0	0	1,449,000
7 Street Lighting	3,389,191	1,626,642	755,098	408,690	257,471	150,578	36,125	49,704	68,991	6,742,490
8 Public Authority	741,326	3,563	1,739	829	339	292	28	13	0	748,129
9 Government	2,618,714	1,087,735	166,974	34,841	20,743	14,441	11,369	17,613	23,705	3,996,135
10 Total	276,698,954	51,837,296	22,617,838	11,869,387	7,103,643	4,692,046	3,359,101	4,382,016	4,132,168	386,692,449

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13 Percentage of Customer Class Total

14										
15 Residential	0.70589	0.13469	0.06342	0.03477	0.02028	0.01293	0.00898	0.01064	0.00839	1.0000
16 SCI	0.73926	0.11522	0.04408	0.02427	0.01645	0.01272	0.01082	0.01714	0.02003	1.0000
17 LCI	0.79055	0.14000	0.04758	0.01402	0.00593	0.00222	0.00054	(0.00051)	(0.00033)	1.0000
18 Railroad	0.42048	0.36912	0.20570	0.00348	0.00122	0.00000	0.00000	0.00000	0.00000	1.0000
19 Street Lighting	0.50266	0.24125	0.11199	0.06061	0.03819	0.02233	0.00536	0.00737	0.01023	1.0000
20 Public Authority	0.99091	0.00476	0.00232	0.00111	0.00045	0.00039	0.00004	0.00002	0.00000	1.0000
21 Government	0.65531	0.27220	0.04178	0.00872	0.00519	0.00361	0.00284	0.00441	0.00593	1.0000
22 Total	4.80506	1.27724	0.51687	0.14698	0.08771	0.05420	0.02858	0.03907	0.04425	7.0000
23										

	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365	
24										
25	Midpoint									
26	Residential	0	45	75	105	135	165	195	240	317.5
27	SCI	8	45	75	105	135	165	195	240	317.5
28	LCI	8	45	75	105	135	165	195	240	317.5
29	Railroad	0	0	15	45	75	105	135	165	287.5
30	Street Lighting	0	0	15	45	75	105	135	165	287.5
31	Public Authority	0	0	15	45	15	45	75	105	287.5
32	Government	0	8	45	75	105	135	165	195	302.5

33
34
35

36 Weighted Average Collection Time by Interval and Customer Category

	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365		
37											
38	Residential	0.00000	6.06105	4.75650	3.65085	2.73780	2.13345	1.75110	2.55360	2.66383	26.30818
39	SCI	5.91408	5.18490	3.30600	2.54835	2.22075	2.09880	2.10990	4.11360	6.35953	33.85591
40	LCI	6.32440	6.30000	3.56850	1.47210	0.80055	0.36630	0.10530	(0.12240)	(0.10478)	18.70998
41	Railroad	0.00000	0.00000	3.08550	0.15660	0.09150	0.00000	0.00000	0.00000	0.00000	3.33360
42	Street Lighting	0.00000	0.00000	1.67985	2.72745	2.86425	2.34465	0.72360	1.21605	2.94113	14.49698
43	Public Authority	0.00000	0.00000	0.03480	0.04995	0.00675	0.01755	0.00300	0.00210	0.00000	0.11415
44	Government	0.00000	2.17760	1.88010	0.65400	0.54495	0.48735	0.46860	0.85995	1.79383	8.86638

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46

47	December 2009	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365	Total
48	Residential	146,079,508	25,596,160	13,300,627	8,441,173	5,187,660	2,928,787	1,812,980	2,239,453	2,163,438	207,749,786
49	SCI	64,036,956	10,251,536	4,849,714	3,057,702	1,843,505	1,423,331	1,032,466	1,874,776	2,017,001	90,386,987
50	LCI	18,058,800	2,803,300	1,413,119	247,081	(1,891)	(66,087)	6,716	(377)	(11,175)	22,449,486
51	Railroad	545,194	453,838	368,727	14,686	11,972	0	0	0	0	1,394,416
52	Street Lighting	3,313,997	569,466	262,070	123,355	22,022	70,578	62,794	98,169	126,472	4,648,922
53	Public Authority	19,775	2,924	3,127	0	0	0	0	0	0	25,826
54	Government	491,613	926,994	311,495	72,214	34,168	23,466	16,760	36,449	69,634	1,982,794
55		232,545,843	40,604,218	20,508,878	11,956,211	7,097,436	4,380,076	2,931,716	4,248,471	4,365,369	328,638,217
1	January 2010	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365	Total
2	Residential	185,346,659	31,900,111	15,897,519	8,954,881	5,908,124	4,163,788	2,695,639	2,438,039	2,377,326	259,682,085
3	SCI	74,740,471	11,384,931	3,944,760	2,300,953	1,718,992	1,503,867	1,240,849	1,663,551	2,115,991	100,614,365
4	LCI	24,252,326	4,502,712	1,409,411	359,262	165,360	23,287	(73,143)	0	0	30,639,215
5	Railroad	724,019	466,423	303,948	14,901	11,039	0	0	0	0	1,520,330
6	Street Lighting	2,591,140	1,015,598	(245,971)	96,405	95,868	27,276	24,474	60,949	95,033	3,760,772
7	Public Authority	(5,694)	3,425	2,924	3,127	0	0	0	0	0	3,781
8	Government	2,768,388	1,650,413	273,180	44,329	40,139	31,442	21,777	26,590	61,514	4,917,772
9		290,417,310	50,923,612	21,585,771	11,773,858	7,939,520	5,749,659	3,909,596	4,189,128	4,649,865	401,138,320
10											
11	February 2010										
12	Residential	160,815,689	36,718,326	16,740,437	9,123,745	5,375,992	4,308,728	2,986,083	3,080,260	2,270,592	241,419,852
13	SCI	70,080,361	11,782,466	4,075,490	2,266,950	1,591,028	1,450,494	1,204,800	1,782,728	2,093,727	96,328,045
14	LCI	22,833,041	4,128,850	1,792,049	759,060	106,211	13,517	13,287	(73,143)	0	29,572,873
15	Railroad	713,793	653,568	324,369	0	0	0	0	0	0	1,691,729
16	Street Lighting	2,929,214	696,158	313,326	(135,613)	70,068	90,334	8,050	78,785	97,743	4,148,065
17	Public Authority	9,647,402	4,913	3,425	229	219	0	0	0	0	9,656,188
18	Government	2,942,448	1,536,741	349,684	36,024	19,970	29,322	24,791	31,669	52,236	5,022,886
19		269,961,948	55,521,023	23,598,780	12,050,396	7,163,489	5,892,396	4,237,011	4,900,298	4,514,298	387,839,639
20											
21	March 2010										
22	Residential	135,264,789	31,155,178	18,943,050	9,270,416	5,152,928	3,575,454	2,843,466	3,325,794	2,057,267	211,588,343
23	SCI	68,144,683	10,962,375	4,307,154	2,211,936	1,508,446	1,360,785	1,153,273	1,846,503	2,035,012	93,530,166
24	LCI	24,779,456	3,869,228	1,246,395	644,465	32,650	(48,439)	6,434	(29,243)	0	30,500,945
25	Railroad	680,372	611,672	369,369	0	0	0	0	0	0	1,661,414
26	Street Lighting	4,676,212	879,629	229,187	231,875	(164,709)	63,096	66,361	32,897	97,360	6,111,909
27	Public Authority	(1,537)	4,902	3,828	3,425	229	219	0	0	0	11,066
28	Government	2,529,437	1,227,356	327,074	32,360	22,427	10,781	15,832	24,509	34,171	4,223,947
29		236,073,413	48,710,339	25,426,058	12,394,477	6,551,972	4,961,897	4,085,367	5,200,459	4,223,809	347,627,790
30											
31	April 2010										
32	Residential	124,019,432	27,219,624	15,343,045	9,736,696	5,362,138	2,971,785	2,381,515	3,177,152	2,153,575	192,364,962
33	SCI	66,335,484	10,401,401	4,097,640	2,426,053	1,554,808	1,084,946	1,134,026	1,781,200	1,944,854	90,760,412
34	LCI	21,542,081	5,917,953	633,754	150,712	115,784	14,509	(13,075)	0	0	28,361,719
35	Railroad	601,526	596,195	482,783	23,141	0	0	0	0	0	1,703,646
36	Street Lighting	3,474,910	2,892,680	357,902	93,062	119,550	(181,931)	42,170	30,175	112,986	6,941,504
37	Public Authority	(6,238)	1,039	113	151	128	229	135	0	0	(4,443)
38	Government	2,671,562	1,104,042	201,209	66,722	24,477	18,746	7,939	29,366	29,874	4,153,936
39		218,638,757	48,132,936	21,116,446	12,496,537	7,176,885	3,908,284	3,552,710	5,017,892	4,241,289	324,281,736
40											
41	May 2010										
42	Residential	121,525,008	25,098,295	12,390,340	8,561,729	5,506,016	3,159,696	1,927,803	2,635,102	2,018,587	182,822,575
43	SCI	65,653,792	10,137,764	3,435,295	2,270,524	1,776,264	1,120,683	913,266	1,665,334	1,889,495	88,862,417
44	LCI	19,726,126	4,291,283	3,495,730	178,701	44,150	91,882	363	(18,906)	0	27,809,330
45	Railroad	546,472	478,372	32,069	0	0	0	0	0	0	1,056,914
46	Street Lighting	3,638,073	2,310,293	2,082,979	343,974	70,992	119,953	(211,125)	74,789	62,989	8,492,916
47	Public Authority	(6,138)	3,903	3,422	3,843	3,928	3,353	229	174	0	12,614
48	Government	2,606,212	1,172,915	81,980	69,926	56,661	23,063	18,677	20,443	34,609	4,084,487
49		213,689,546	43,492,826	21,521,815	11,428,697	7,457,912	4,518,629	2,649,213	4,376,936	4,005,679	313,141,253

50											
51	June 2010										
52	Residential	190,019,004	24,569,140	13,072,786	7,932,737	4,866,284	3,762,028	2,308,216	2,363,980	2,074,872	250,969,048
53	SCI	77,260,125	11,130,889	4,138,940	2,308,859	1,613,881	1,305,296	996,633	1,564,361	1,949,404	102,268,389
54	LCI	21,192,366	4,214,851	1,303,018	129,918	91,419	(30,023)	36,185	(34,043)	0	26,903,691
55	Railroad	584,530	507,047	339,026	4,490	0	0	0	0	0	1,435,094
56	Street Lighting	3,342,334	1,886,325	341,433	214,890	114,638	58,509	156,430	(173,634)	66,113	6,007,038
57	Public Authority	(2,421)	737	0	0	0	0	0	0	0	(1,683)
58	Government	2,463,336	1,128,159	51,364	24,230	26,738	20,802	4,092	62	(1,679)	3,717,103
59		294,859,276	43,437,148	19,246,567	10,615,124	6,712,961	5,116,612	3,501,556	3,720,726	4,088,710	391,298,680
1											
2	July 2010	0 - 30	31 - 60	61 - 90	91 - 120	121 - 150	151 - 180	181 - 210	211 - 270	271 - 365	Total
3	Residential	275,307,393	33,061,351	10,897,772	6,793,336	4,678,100	3,141,003	2,509,952	2,536,956	1,861,009	340,786,871
4	SCI	86,939,025	10,970,716	3,988,390	2,256,282	1,607,368	1,203,613	1,132,923	1,505,027	1,972,135	111,575,481
5	LCI	24,146,448	3,001,345	1,080,200	375,293	99,090	77,274	(41,291)	(10,964)	(18,906)	28,708,489
6	Railroad	615,191	523,195	315,173	0	0	0	0	0	0	1,453,558
7	Street Lighting	3,025,371	2,125,837	1,466,477	184,214	100,241	54,990	(60,465)	104,216	75,185	7,076,065
8	Public Authority	112	0	737	0	0	0	0	0	0	849
9	Government	3,137,417	812,190	104,609	19,445	15,757	23,104	18,234	6,642	(1,717)	4,135,682
10		393,170,958	50,494,634	17,853,358	9,628,570	6,500,557	4,499,984	3,559,353	4,141,876	3,887,707	493,736,996
11											
12	August 2010										
13	Residential	299,938,580	47,663,639	12,259,250	5,847,282	3,934,301	2,914,060	2,251,758	2,846,513	1,701,638	379,357,023
14	SCI	97,505,706	11,949,369	3,268,318	2,024,190	1,528,315	1,180,117	1,033,953	1,704,446	1,804,741	121,999,152
15	LCI	23,269,475	4,061,471	713,594	439,053	322,375	57,959	52,572	(52,158)	(31,795)	28,832,546
16	Railroad	599,220	548,314	321,051	8,331	0	0	0	0	0	1,476,916
17	Street Lighting	4,335,215	2,083,295	1,458,089	1,352,199	160,276	90,434	88,079	(6,089)	116,980	9,678,478
18	Public Authority	39	4,897	0	0	0	0	0	0	0	4,936
19	Government	3,403,616	1,241,155	173,782	20,095	475	8,161	15,172	16,707	(2,060)	4,877,102
20		429,051,850	67,552,141	18,194,084	9,691,150	5,945,742	4,250,730	3,441,534	4,509,419	3,589,504	546,226,153
21											
22	September 2010										
23	Residential	224,937,414	55,924,024	19,037,601	6,724,454	3,077,700	2,478,364	2,049,052	2,804,931	1,826,085	318,859,626
24	SCI	84,195,292	14,929,902	4,407,830	2,137,480	1,283,763	1,208,398	996,560	1,658,935	1,844,606	112,662,766
25	LCI	21,275,516	3,196,161	1,248,736	467,523	152,686	52,591	46,346	26,325	(31,795)	26,434,090
26	Railroad	575,923	498,953	10,370	0	0	0	0	0	0	1,085,246
27	Street Lighting	3,277,455	2,767,279	1,287,257	1,354,135	1,276,060	166,638	85,901	746	128,760	10,344,229
28	Public Authority	(466)	6,365	0	0	0	0	0	0	0	5,899
29	Government	3,236,999	1,535,307	37,324	(8,369)	11,036	(1,404)	7,508	27,607	(857)	4,845,151
30		337,498,134	78,857,990	26,029,118	10,675,223	5,801,245	3,904,586	3,185,368	4,518,544	3,766,800	474,237,007
31											
32	October 2010										
33	Residential	136,962,868	40,714,281	22,501,417	8,526,898	3,519,701	1,990,438	1,657,788	2,525,283	2,029,338	220,428,014
34	SCI	67,835,218	11,878,292	5,609,409	2,160,213	1,455,606	1,117,495	1,024,589	1,620,507	1,934,523	94,635,852
35	LCI	21,124,279	3,014,594	721,434	622,999	302,474	89,395	8,325	9,711	(21,099)	25,872,112
36	Railroad	614,082	551,846	313,106	0	0	0	0	0	0	1,479,033
37	Street Lighting	3,313,457	1,860,428	1,885,711	1,184,694	1,273,659	1,263,014	102,986	82,960	(66,646)	10,900,262
38	Public Authority	(1,627)	5,115	1,154	0	0	0	0	0	0	4,642
39	Government	2,715,901	613,749	83,071	30,568	(4,467)	8,457	(3,099)	7,333	7,519	3,459,032
40		232,564,176	58,638,304	31,115,302	12,525,373	6,546,973	4,468,800	2,790,590	4,245,795	3,883,634	356,778,947
41											

42	November 2010										
43	Residential	119,161,466	29,615,151	19,537,131	11,030,434	5,156,059	2,703,830	1,467,763	2,295,504	2,238,373	193,205,710
44	SCI	53,302,004	11,935,207	5,120,191	2,684,938	1,367,492	1,202,180	921,188	1,542,649	1,884,075	79,959,925
45	LCI	14,467,074	3,280,320	831,911	240,127	465,572	127,145	(9,114)	8,218	(5,545)	19,405,708
46	Railroad	565,490	553,658	344,229	0	0	0	0	0	0	1,463,377
47	Street Lighting	3,088,095	1,077,422	201,466	191,349	65,916	108,253	37,276	127,678	(19,032)	4,878,423
48	Public Authority	(1,331)	4,405	3,869	0	0	0	0	0	0	6,942
49	Government	2,155,901	713,571	70,115	51,454	11,975	(7,741)	11,195	1,726	10,981	3,019,177
50		192,738,698	47,179,733	26,108,912	14,198,302	7,067,015	4,133,668	2,428,308	3,975,775	4,108,851	301,939,262
51											
52	December 2010										
53	Residential	170,960,198	27,785,661	15,861,830	11,884,541	8,063,380	3,854,125	2,251,586	2,263,714	2,457,025	245,382,059
54	SCI	61,254,506	8,372,546	4,642,277	2,668,648	2,011,545	966,875	935,605	1,525,908	1,912,572	84,290,481
55	LCI	17,137,183	2,208,108	590,048	242,549	157,885	364,385	153,194	(3,106)	6,192	20,856,440
56	Railroad	554,783	510,016	350,518	0	0	0	0	0	0	1,415,316
57	Street Lighting	3,054,013	981,934	176,344	78,431	142,547	26,364	66,698	134,508	2,936	4,663,776
58	Public Authority	(4,642)	3,697	4	0	0	0	0	0	0	(941)
59	Government	2,920,446	477,967	105,770	(6,065)	10,309	(462)	(11,087)	(135)	13,942	3,510,686
60		255,876,487	40,339,930	21,726,791	14,868,105	10,385,666	5,211,287	3,395,996	3,920,888	4,392,668	360,117,816

ICC Docket No. 11-0721

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

AG 10.01 – 10.17

Date Received: February 14, 2012

Date Served: February 21, 2012

REQUEST NO. AG 10.17:

Referring to ComEd Exhibit 16.0, page 27, line 585. According to Mr. Hengtgen, "...the amount of CWIP and the associated accounts payable change month to month and the amount of accounts payable at any given time only exists for a short period of time until the vendor is paid and the vendor supplied financing is converted to investor supplied financing." Please respond to the following:

- a. Provide ComEd's monthly actual CWIP balances for all available periods of 2010 and 2011, broken down between AFUDC earning and non-AFUDC earning amounts.
- b. Provide ComEd's monthly "associated accounts payable" balances related to CWIP for all available periods of 2010 and 2011.
- c. Explain Mr. Hengtgen's understanding of the purpose for including Short Term CWIP in rate base, indicating whether he disputes Ms. Houtsma's statement at ComEd Ex. 18.0, line 412, "Rather, the amount of CWIP included in rate base is a proxy for the amount that will exist in future periods."
- d. Explain whether and why it is Mr. Hengtgen's belief that the accounts payable associated with CWIP should be treated as if "they only exist for a short period of time until the vendor is paid" while at the same time CWIP should be included in rate base as a "proxy for the amount that will exist in future periods"?
- e. Does ComEd expect to change its methods of constructing assets that are recorded as CWIP, such that in future periods no vendor financing will be associated with equipment or services capitalized into CWIP each month?
- f. Does ComEd expect to change its methods of paying employees for the time spent working on self-constructed assets for which labor costs are charged to CWIP?
- g. If your responses to parts (e) or (f) are affirmative, please explain and quantify the plans for such changes and how they will impact accounts payable associated with CWIP.

RESPONSE:

- a. Please see the attachment labeled as AG 10.17_Attach 1 for monthly CWIP balances for the years 2010 and 2011, broken down between AFUDC earning and non-AFUDC earning amounts. A jurisdictional view of these balances is shown on page 2 of this attachment. Please note that amounts shown for 2011 are preliminary and subject to change.
- b. ComEd does not record its accounts payable at the level of detail requested. For purposes of calculating a cash working capital component for accounts payable related to CWIP not eligible for AFUDC, ComEd prepared an estimate that is based on general assumptions about ComEd's accounts payable balances and is for illustrative and

estimation purposes only. Please see the attachment labeled as AG 10.17_Attach 1 for this estimated amount by month. A jurisdictional view of this amount is shown on page 2 of this attachment.

- c. Mr. Hengtgen is not testifying on the inclusion of CWIP in rate base.
- d. Mr. Hengtgen has indicated that the estimated lead time associated with CWIP related vendor accounts payable is 67 days. Mr. Hengtgen is not testifying on the calculation of the amount of CWIP in rate base.
- e. No.
- f. No.
- g. N/A.

Commonwealth Edison Company
Total Balance of CWIP and
Estimated Accounts Payable Related to Balance Not Earning AFUDC
(In Thousands)

Month	Year 2010 (1)				Year 2011 (Preliminary) (1)			
	Total CWIP Balance	Balance of CWIP Earning AFUDC	Balance of CWIP Not Earning AFUDC	Estimated Accounts Payable related to Balance of CWIP Not Earning AFUDC (2)	Total CWIP Balance	Balance of CWIP Earning AFUDC	Balance of CWIP Not Earning AFUDC	Estimated Accounts Payable related to Balance of CWIP Not Earning AFUDC (2)
January	\$ 199,462	\$ 179,904	\$ 19,558	\$ (3,763)	\$ 197,961	\$ 163,011	\$ 34,950	\$ (7,933)
February	211,091	195,008	16,083	(2,839)	219,001	182,029	36,972	(7,308)
March	233,903	201,274	32,629	(5,237)	235,891	199,332	36,559	(6,641)
April	168,082	136,157	31,925	(6,519)	247,199	209,514	37,685	(6,648)
May	169,201	131,030	38,171	(9,735)	215,724	177,103	38,621	(9,104)
June	141,136	98,883	42,253	(17,380)	230,055	184,927	45,128	(9,273)
July	159,304	112,205	47,099	(11,488)	207,443	136,031	71,412	(22,653)
August	172,643	135,188	37,455	(8,561)	187,873	146,261	41,612	(15,272)
September	203,131	164,233	38,898	(8,908)	206,478	164,550	41,928	(13,340)
October	225,767	181,291	44,476	(7,446)	240,247	197,834	42,413	(10,849)
November	244,563	200,033	44,530	(8,975)	243,776	203,071	40,705	(11,029)
December	207,042	176,987	30,055	(6,584)	186,925	166,507	20,418	(7,020)

Note:

- 1) The CWIP balances shown include three allocation projects that are not eligible for AFUDC that are typically allocated between T&D after removal from CWIP. These projects were excluded from ComEd's Schedule WPB-7.
- 2) The analysis of Accounts Payable balances assumes that certain CWIP cost elements are not supported by Accounts Payable and that the A/P related to materials is discharged before materials are transferred from inventory to CWIP. From the remaining cost elements a ratio of CapEx to total spend is determined and that ratio is applied to the monthly non-materials A/P balance to estimate the amount of A/P applicable to CWIP. The resulting A/P is allocated between CWIP earning AFUDC and CWIP not earning AFUDC.

Commonwealth Edison Company
Balance of Distribution CWIP and
Estimated Accounts Payable Related to Balance Not Earning AFUDC
(In Thousands)

Month	Year 2010 (1)				Year 2011 (Preliminary) (1)			
	Total Distribution CWIP Balance	Balance of Distribution CWIP Earning AFUDC	Balance of Distribution CWIP Not Earning AFUDC	Estimated Accounts Payable related to Balance of Distribution CWIP Not Earning AFUDC (2)	Total Distribution CWIP Balance	Balance of Distirbution CWIP Earning AFUDC	Balance of Distribution CWIP Not Earning AFUDC	Estimated Accounts Payable related to Balance of Distribution CWIP Not Earning AFUDC (2)
January	\$ 86,077	\$ 73,590	\$ 12,487	\$ (2,403)	\$ 56,392	\$ 49,651	\$ 6,741	\$ (1,530)
February	89,762	77,787	11,975	(2,114)	60,179	50,242	9,937	(1,964)
March	98,499	80,327	18,172	(2,916)	58,534	50,240	8,294	(1,507)
April	85,721	70,662	15,059	(3,075)	65,765	53,980	11,785	(2,079)
May	79,566	64,413	15,153	(3,864)	58,116	46,164	11,952	(2,817)
June	86,651	60,649	26,002	(10,448)	65,385	43,527	21,858	(4,491)
July	92,591	64,433	28,158	(6,868)	88,233	44,627	43,606	(13,832)
August	91,011	71,139	19,872	(4,542)	65,685	48,399	17,286	(6,344)
September	103,391	85,367	18,024	(4,128)	78,247	62,546	15,701	(4,996)
October	109,097	89,638	19,459	(3,258)	95,999	80,247	15,752	(4,029)
November	107,751	89,371	18,380	(3,705)	104,498	88,573	15,925	(4,315)
December	86,268	80,043	6,225	(1,399)	77,193	68,954	8,239	(2,833)

Notes:

- 1) CWIP balance does not include jurisdictional General and Intangible Plant calculation.
- 2) The analysis of Accounts Payable balances assumes that certain CWIP cost elements are not supported by Accounts Payable and that the A/P related to materials is discharged before materials are transferred from inventory to CWIP. From the remaining cost elements a ratio of CapEx to total spend is determined and that ratio is applied to the monthly non-materials A/P balance to estimate the amount of A/P applicable to CWIP. The resulting A/P is allocated between CWIP earning AFUDC and CWIP not earning AFUDC.

ICC Docket No. 11-0721

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

AG 4.01 – 4.26

Date Received: December 8, 2011

Date Served: February 8, 2012

REQUEST NO. AG 4.11:

Ref: ComEd Response to AG 1.11; Schedule C-7; Ex. 4.1 App 7 (Charitable Contributions).

According to the referenced Schedule and Exhibit, ComEd is seeking rate recovery of \$6 million of charitable contributions, by reclassifying this FERC below-the-line expense amount into test year operating expenses. The referenced response to AG 1.11 describes the process and philosophy behind the Company's charitable spending and ratemaking proposal. Please provide the following additional information:

- a. Explain how ComEd's overall charitable spending budget is established each year and provide detailed calculations for this budget for 2010 and 2011.
- b. Explain and quantify how the ComEd annual budget for charitable contributions is integrated with the overall Exelon plan for charitable contributions and provide documentation for 2010 and 2011 illustrating this integration.
- c. Does the Illinois policy of reclassifying charitable giving above-the-line, to effect ratepayer funding, change the ComEd or Exelon philosophy or annual budget regarding the amounts of charitable contributions to be funded?
- d. If your response to part (c) is affirmative, explain and quantify how the Illinois policy regarding rate recovery of charitable contributions influences contribution levels for ComEd and for Exelon.
- e. For each of the past five years, please provide a summary of charitable contributions that were funded by each of the following entities in nominal dollars and as a percentage of annual margin revenues (gross revenues less cost of goods sold):
 - i. ComEd
 - ii. Philadelphia Electric
 - iii. Exelon Generation
 - iv. Exelon Transmission Company
 - v. Exelon Parent and Other entities.

SUPPLEMENTAL RESPONSE TO SUBPART (e):

- e. ComEd objects to this request to the extent it seeks information relating to charitable contributions made by other entities that are not a party to this proceeding and whose costs are not at issue. Notwithstanding that objection, and pursuant to agreement of counsel that the data provided would satisfy this request, ComEd provides the total amount of charitable contributions by Exelon companies in total, and totals for Exelon Business Services

Company (EBSC), ComEd, PECO and the combination of all other Exelon companies, for the past five years. Data is provided from the Exelon Corporate Relations corporate giving data base. The amounts shown may differ from amounts recorded in the general ledger system as they do not reflect any net accruals, cancelled or reissued payments, manual correcting journal entries, or allocation entries. Also, the amounts shown below for ComEd do not include any ratemaking adjustments that would have been reflected in ComEd's current or previous distribution rate filings. ComEd's initial data request response to subpart (e) of AG 4.11 was based on queries from the general ledger system and included certain rate making adjustments. As a result, the amounts shown below will necessarily differ from the ComEd and Exelon BSC amounts provided in ComEd's Data Request Response to subpart (e) of AG 4.11. They nonetheless provide a reasonable basis upon which to observe the relative amount of contributions made by each listed organization.

Exelon
 Charitable Contributions
 for the Years 2006-2010
 (In Thousands)

Year	Total Exelon	Exelon BSC	Before Allocation From EBSC		
			ComEd	PECO	All Other
2006	\$ 22,248	\$ 7,466	\$ 6,543	\$ 6,826	\$ 1,413
2007	\$ 20,369	\$ 6,400	\$ 6,607	\$ 5,893	\$ 1,469
2008	\$ 24,644	\$ 8,680	\$ 6,817	\$ 6,511	\$ 2,636
2009	\$ 21,104	\$ 7,922	\$ 4,769	\$ 5,665	\$ 2,748
2010	\$ 17,980	\$ 6,833	\$ 3,983	\$ 4,625	\$ 2,539

ICC Docket No. 11-0721

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

AG 7.01 – 7.09

Date Received: December 27, 2011

Date Served: January 10, 2012

REQUEST NO. AG 7.08:

Ref: Response to AG 4.11 (Charitable Contributions).

The referenced response at part (c) states, "There is no basis for evaluating what the budget would have been were rate recovery not allowable." Please response to the following:

- a. State and explain whether rate recovery for charitable contributions is "allowable" in Pennsylvania rate case proceedings of Philadelphia Electric.
- b. State and explain whether rate recovery for charitable contributions is "allowable" before the FERC in rate case proceedings of Exelon Transmission Company.
- c. Confirm that ComEd does not seek or receive rate recovery of charitable contributions in its FERC Formula Rate proceedings, or explain any inability to provide confirmation.
- d. Provide the information requested in part (e) of AG 4.11 for the purpose of evaluating the impact of rate recovery of charitable contributions upon actual contributions made by Exelon in the name of (and on the books of) Philadelphia Electric and the other listed Exelon business units.

RESPONSE:

- a. ComEd objects to this subpart on the grounds that it requests information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in that it seeks information relating to charitable contributions made by other entities that are not a party to this proceeding. Subject to this objection and ComEd's General Objections, recovery of charitable contributions is not included in PECO's rates.
- b. Exelon Transmission Company does not have a FERC tariff, and thus is not seeking recovery for charitable contributions. If Exelon Transmission Company does seek approval from FERC for a cost of service based tariff, all inputs and calculations will be subject to review by FERC and interested parties to ensure that the rates are just, reasonable, and consistent with FERC policy.
- c. ComEd does not seek recovery of charitable contributions in its FERC Formula Rate.
- d. ComEd objects to this subpart on the grounds that it requests information that is not relevant and not reasonably calculated to lead to the discovery of admissible evidence in that it seeks information relating to charitable contributions made by other entities that are not a party to this proceeding as well as legal and policy issues that are not at issue in this proceeding in that they are contrary to the terms of the Public Utilities Act ("PUA").