

The People of the State of Illinois' and AARP's  
Responses to ComEd's Second Set of Data Requests  
ICC Docket No. 11-0721  
January 20, 2012

ComEd →AG/AARP 2.01 Does Mr. Brosch agree that if the Commission does not allow ComEd to use the Wages & Salary allocator, but instead requires ComEd to use the existing ICC-approved method of allocation, for purposes of allocating General & Intangible Plant, ComEd will not be allowed to recover all of its prudent costs of such Plant so long as FERC requires ComEd to use the Wages & Salary allocator? If the answer is anything other than an unequivocal "yes", please explain the answer.

RESPONSE: Yes. If the Illinois Commerce Commission continues to require use of the same jurisdictional allocator factors that were employed in prior ICC rate cases, the Company would need to either revise the allocations being used in its FERC filings, to conform to the ICC-approved methods and not use the Wages and Salary allocator, or risk recovery of less than 100% of its total allocable investment. See AG/AARP Ex. 1.0 at page 40, lines 885-893.

**OFFICIAL FILE**

I.C.C. DOCKET NO. 11-0721  
ComEd Cross Exhibit No. 16  
Witness Michael Brosch  
Date 3/12/12 Reporter TO