

Michael L. Brosch
Summary of Previously Filed Testimony

<u>Utility</u>	<u>Jurisdiction</u>	<u>Agency</u>	<u>Docket/Case Number</u>	<u>Represented</u>	<u>Year</u>	<u>Addressed</u>
Green Hills Telephone Company	Missouri	PSC	TR-78-282	Staff	1978	Rate Base, Operating Income
Kansas City Power and Light Co.	Missouri	PSC	ER-78-252	Staff	1978	Rate Base, Operating Income
Missouri Public Service Company	Missouri	PSC	ER-79-59	Staff	1979	Rate Base, Operating Income
Nodaway Valley Telephone Company	Missouri	PSC	16,567	Staff	1979	Rate Base, Operating Income
Gas Service Company	Missouri	PSC	GR-79-114	Staff	1979	Rate Base, Operating Income
United Telephone Company	Missouri	PSC	TO-79-227	Staff	1979	Rate Base, Operating Income
Southwestern Bell Telephone Co.	Missouri	PSC	TR-79-213	Staff	1979	Rate Base, Operating Income
Missouri Public Service Company	Missouri	PSC	ER-80-118 GR-80-117	Staff	1980	Rate Base, Operating Income
Southwestern Bell Telephone Co.	Missouri	PSC	TR-80-256	Staff	1980	Affiliate Transactions
United Telephone Company	Missouri	PSC	TR-80-235	Staff	1980	Affiliate Transactions, Cost Allocations
Kansas City Power and Light Co.	Missouri	PSC	ER-81-42	Staff	1981	Rate Base, Operating Income
Southwestern Bell Telephone	Missouri	PSC	TR-81-208	Staff	1981	Rate Base, Operating Income, Affiliated Interest
Northern Indiana Public Service	Indiana	PSC	36689	Consumers Counsel	1982	Rate Base, Operating Income
Northern Indiana Public Service	Indiana	URC	37023	Consumers Counsel	1983	Rate Base, Operating Income, Cost Allocations
Mountain Bell Telephone	Arizona	ACC	9981-E1051-81-406	Staff	1982	Affiliated Interest
Sun City Water	Arizona	ACC	U-1656-81-332	Staff	1982	Rate Base, Operating Income
Sun City Sewer	Arizona	ACC	U-1656-81-331	Staff	1982	Rate Base, Operating Income
El Paso Water	Kansas	City Counsel	Unknown	Company	1982	Rate Base, Operating Income, Rate of Return
Ohio Power Company	Ohio	PUCO	83-98-EL-AIR	Consumer Counsel	1983	Operating Income, Rate Design, Cost Allocations
Dayton Power & Light Company	Ohio	PUCO	83-777-GA-AIR	Consumer Counsel	1983	Rate Base
Walnut Hill Telephone	Arkansas	PSC	83-010-U	Company	1983	Operating Income, Rate Base
Cleveland Electric Illum.	Ohio	PUCO	84-188-EL-AIR	Consumer Counsel	1984	Rate Base, Operating Income, Cost Allocations
Cincinnati Gas & Electric	Ohio	PUCO	84-13-EL-EFC	Consumer Counsel	1984	Fuel Clause
Cincinnati Gas & Electric	Ohio	PUCO	84-13-EL-EFC (Subfile A)	Consumer Counsel	1984	Fuel Clause
General Telephone - Ohio	Ohio	PUCO	84-1026-TP-AIR	Consumer Counsel	1984	Rate Base
Cincinnati Bell Telephone	Ohio	PUCO	84-1272-TP-AIR	Consumer Counsel	1985	Rate Base
Ohio Bell Telephone	Ohio	PUCO	84-1535-TP-AIR	Consumer Counsel	1985	Rate Base

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United Telephone - Missouri	Missouri	PSC	TR-85-179	Staff	1985	Rate Base, Operating Income
Wisconsin Gas	Wisconsin	PSC	05-UI-18	Staff	1985	Diversification-Restructuring
United Telephone - Indiana	Indiana	URC	37927	Consumer Counsel	1986	Rate Base, Affiliated Interest
Indianapolis Power & Light	Indiana	URC	37837	Consumer Counsel	1986	Rate Base
Northern Indiana Public Service	Indiana	URC	37972	Consumer Counsel	1986	Plant Cancellation Costs
Northern Indiana Public Service	Indiana	URC	38045	Consumer Counsel	1986	Rate Base, Operating Income, Cost Allocations, Capital Costs
Arizona Public Service	Arizona	ACC	U-1435-85-367	Staff	1987	Rate Base, Operating Income, Cost Allocations
Kansas City, KS Board of Public Utilities	Kansas	BPU	87-1	Municipal Utility	1987	Operating Income, Capital Costs
Detroit Edison	Michigan	PSC	U-8683	Industrial Customers	1987	Income Taxes
Consumers Power	Michigan	PSC	U-8681	Industrial Customers	1987	Income Taxes
Consumers Power	Michigan	PSC	U-8680	Industrial Customers	1987	Income Taxes
Northern Indiana Public Service	Indiana	URC	38365	Consumer Counsel	1987	Rate Design
Indiana Gas	Indiana	URC	38080	Consumer Counsel	1987	Rate Base
Northern Indiana Public Service	Indiana	URC	38380	Consumers Counsel	1988	Rate Base, Operating Income, Rate Design, Capital Costs
Terre Haute Gas	Indiana	URC	38515	Consumers Counsel	1988	Rate Base, Operating Income, Capital Costs
United Telephone -Kansas	Kansas	KCC	162,044-U	Consumers Counsel	1989	Rate Base, Capital Costs, Affiliated Interest
US West Communications	Arizona	ACC	E-1051-88-146	Staff	1989	Rate Base, Operating Income, Affiliate Interest
All Kansas Electrics	Kansas	KCC	140,718-U	Consumers Counsel	1989	Generic Fuel Adjustment Hearing
Southwest Gas	Arizona	ACC	E-1551-89-102 E-1551-89-103	Staff	1989	Rate Base, Operating Income, Affiliated Interest
American Telephone and Telegraph	Kansas	KCC	167,493-U	Consumers Counsel	1990	Price/Flexible Regulation, Competition, Revenue Requirements
Indiana Michigan Power	Indiana	URC	38728	Consumer Counsel	1989	Rate Base, Operating Income, Rate Design
People Gas, Light and Coke Company	Illinois	ICC	90-0007	Public Counsel	1990	Rate Base, Operating Income
United Telephone Company	Florida	PSC	891239-TL	Public Counsel	1990	Affiliated Interest
Southwestern Bell Telephone Company	Oklahoma	OCC	PUD-000662	Attorney General	1990	Rate Base, Operating Income (Testimony not admitted)
Arizona Public Service Company	Arizona	ACC	U-1345-90-007	Staff	1991	Rate Base, Operating Income
Indiana Bell Telephone Company	Indiana	URC	39017	Consumer Counsel	1991	Test Year, Discovery, Schedule
Southwestern Bell Telephone Company	Oklahoma	OCC	39321	Attorney General	1991	Remand Issues

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UtiliCorp United/ Centel	Kansas	KCC	175,476-U	Consumer Counsel	1991	Merger/Acquisition
Southwestern Bell Telephone Company	Oklahoma	OCC	PUD-000662	Attorney General	1991	Rate Base, Operating Income
United Telephone - Florida	Florida	PSC	910980-TL	Public Counsel	1992	Affiliated Interest
Hawaii Electric Light Company	Hawaii	PUC	6999	Consumer Advocate	1992	Rate Base, Operating Income, Budgets/Forecasts
Maui Electric Company	Hawaii	PUC	7000	Consumer Advocate	1992	Rate Base, Operating Income, Budgets/Forecasts
Southern Bell Telephone Company	Florida	PSC	920260-TL	Public Counsel	1992	Affiliated Interest
US West Communications	Washington	WUTC	U-89-3245-P	Attorney General	1992	Alternative Regulation
UtiliCorp United/ MPS	Missouri	PSC	ER-93-37	Staff	1993	Affiliated Interest
Oklahoma Natural Gas Company	Oklahoma	OCC	PUD-1151, 1144, 1190	Attorney General	1993	Rate Base, Operating Income, Take or Pay, Rate Design
Public Service Company of Oklahoma	Oklahoma	OCC	PUD-1342	Staff	1993	Rate Base, Operating Income, Affiliated Interest
Illinois Bell Telephone	Illinois	ICC	92-0448 92-0239	Citizens Board	1993	Rate Base, Operating Income, Alt. Regulation, Forecasts, Affiliated Interest
Hawaii Electric Company	Hawaii	PUC	7700	Consumer Advocate	1993	Rate Base, Operating Income
US West Communications	Arizona	ACC	E-1051-93-183	Staff	1994	Rate Base, Operating Income
PSI Energy, Inc.	Indiana	URC	39584	Consumer Counselor	1994	Rate Base, Operating Income, Alt. Regulation, Forecasts, Affiliated Interest
Arkla, a Division of NORAM Energy	Oklahoma	OCC	PUD-940000354	Attorney General	1994	Cost Allocations, Rate Design
PSI Energy, Inc.	Indiana	URC	39584-S2	Consumer Counselor	1994	Merger Costs and Cost Savings, Non-Traditional Ratemaking
Transok, Inc.	Oklahoma	OCC	PUD-1342	Staff	1994	Rate Base, Operating Income, Affiliated Interest, Allocations
Oklahoma Natural Gas Company	Oklahoma	OCC	PUD-940000477	Attorney General	1995	Rate Base, Operating Income, Cost of Service, Rate Design
US West Communications	Washington	WUTC	UT-950200	Attorney General/ TRACER	1995	Operating Income, Affiliate Interest, Service Quality
PSI Energy, Inc.	Indiana	URC	40003	Consumer Counselor	1995	Rate Base, Operating Income
Oklahoma Natural Gas Company	Oklahoma	OCC	PUD-880000598	Attorney General	1995	Stand-by Tariff
GTE Hawaiian Telephone Co., Inc.	Hawaii	PUC	PUC 94-0298	Consumer Advocate	1996	Rate Base, Operating Income, Affiliate Interest, Cost Allocations
Mid-American Energy Company	Iowa	ICC	APP-96-1	Consumer Advocate	1996	Non-Traditional Ratemaking
Oklahoma Gas and Electric Company	Oklahoma	OCC	PUD-960000116	Attorney General	1996	Rate Base, Operating Income, Rate Design, Non-Traditional Ratemaking
Southwest Gas Corporation	Arizona	ACC	U-1551-96-596	Staff	1997	Operating Income, Affiliated Interest, Gas Supply

Utilitech, Inc.

AG Exhibit 1.2

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Utilicorp United - Missouri Public Service Division	Missouri	PSC	EO-97-144	Staff	1997	Operating Income
US West Communications	Utah	PSC	97-049-08	Consumer Advocate	1997	Rate Base, Operating Income, Affiliate Interest, Cost Allocations
US West Communications	Washington	WUTC	UT-970766	Attorney General	1997	Rate Base, Operating Income
Missouri Gas Energy	Missouri	PSC	GR 98-140	Public Counsel	1998	Affiliated Interest
ONEOK	Oklahoma	OCC	PUD980000177	Attorney General	1998	Gas Restructuring, rate Design, Unbundling
Nevada Power/Sierra Pacific Power Merger	Nevada	PSC	98-7023	Consumer Advocate	1998	Merger Savings, Rate Plan and Accounting
PacifiCorp / Utah Power	Utah	PSC	97-035-1	Consumer Advocate	1998	Affiliated Interest
MidAmerican Energy / CalEnergy Merger	Iowa	PUB	SPU-98-8	Consumer Advocate	1998	Merger Savings, Rate Plan and Accounting
American Electric Power / Central and South West Merger	Oklahoma	OCC	980000444	Attorney General	1998	Merger Savings, Rate Plan and Accounting
ONEOK Gas Transportation	Oklahoma	OCC	970000088	Attorney General	1998	Cost of Service, Rate Design, Special Contract
U S West Communications	Washington	WUTC	UT-98048	Attorney General	1999	Directory Imputation and Business Valuation
U S West / Qwest Merger	Iowa	PUB	SPU 99-27	Consumer Advocate	1999	Merger Impacts, Service Quality and Accounting
U S West / Qwest Merger	Washington	WUTC	UT-991358	Attorney General	2000	Merger Impacts, Service Quality and Accounting
U S West / Qwest Merger	Utah	PSC	99-049-41	Consumer Advocate	2000	Merger Impacts, Service Quality and Accounting
PacifiCorp / Utah Power	Utah	PSC	99-035-10	Consumer Advocate	2000	Affiliated Interest
Oklahoma Natural Gas, ONEOK Gas Transportation	Oklahoma	OCC	980000683, 980000570, 990000166	Attorney General	2000	Operating Income, Rate Base, Cost of Service, Rate Design, Special Contract
U S West Communications	New Mexico	PRC	3008	Staff	2000	Operating Income, Directory Imputation
U S West Communications	Arizona	ACC	T-0105B-99-0105	Staff	2000	Operating Income, Rate Base, Directory Imputation
Northern Indiana Public Service Company	Indiana	IURC	41746	Consumer Counsel	2001	Operating Income, Rate Base, Affiliate Transactions
Nevada Power Company	Nevada	PUCN	01-10001	Attorney General-BCP	2001	Operating Income, Rate Base, Merger Costs, Affiliates
Sierra Pacific Power Company	Nevada	PUCN	01-11030	Attorney General-BCP	2002	Operating Income, Rate Base, Merger Costs, Affiliates
The Gas Company, Division of Citizens Communications	Hawaii	PUC	00-0309	Consumer Advocate	2001	Operating Income, Rate Base, Cost of Service, Rate Design
SBC Pacific Bell	California	PUC	I.01-09-002 R.01-09-001	Office of Ratepayer Advocate	2002	Depreciation, Income Taxes and Affiliates
Midwest Energy, Inc.	Kansas	KCC	02-MDWG-922- RTS	Agriculture Customers	2002	Rate Design, Cost of Capital

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Qwest Communications – Dex Sale	Utah	PSC	02-049-76	Consumer Advocate	2003	Directory Publishing
Qwest Communications – Dex Sale	Washington	WUTC	UT-021120	Attorney General	2003	Directory Publishing
Qwest Communications – Dex Sale	Arizona	ACC	T-0105B-02- 0666	Staff	2003	Directory Publishing
PSI Energy, Inc.	Indiana	IURC	42359	Consumer Counsel	2003	Operating Income, Rate Trackers, Cost of Service, Rate Design
Qwest Communications – Price Cap Review	Arizona	ACC	T-0105B-03- 0454	Staff	2004	Operating Income, Rate Base, Fair Value, Alternative Regulation
Verizon Northwest Corp	Washington	WUTC	UT-040788	Public Counsel	2004	Directory Publishing, Rate Base, Operating Income
Citizens Gas & Coke Utility	Indiana	IURC	42767	Consumer Counsel	2005	Operating Income, Debt Service, Working Capital, Affiliate Transactions, Alternative Regulation
Hawaiian Electric Company	Hawaii	HPUC	04-0113	Consumer Advocate	2005	Operating Income, Rate Base, Cost of Service, Rate Design
Sprint/Nextel Corporation	Washington	WUTC	UT-051291	Public Counsel	2006	Directory Publishing, Corporate Reorganization
Puget Sound Energy, Inc.	Washington	WUTC	UE-060266 and UG-060267	Public Counsel	2006	Alternative Regulation
Hawaiian Electric Company	Hawaii	HPUC	05-0146	Consumer Advocate	2006	Community Benefits / Rate Discounts
Cascade Natural Gas Company	Washington	WUTC	UG-060259	Public Counsel	2006	Alternative Regulation
Arizona Public Service Company	Arizona	ACC	E-01345A-05- 0816	Staff	2006	Cost of Service Allocations
Hawaiian Electric Company	Hawaii	HPUC	05-0146	Consumer Advocate	2006	Capital Improvements and Discounted Rates
Hawaiian Electric Light Company	Hawaii	HPUC	05-0315	Consumer Advocate	2006	Operating Income, Rate Base, Cost of Service, Rate Design
Union Electric Company d/b/a AmerenUE	Missouri	PSC	2007-0002	Attorney General	2007	Operating Income, Rate Base, Fuel Adjustment Clause
Hawaiian Electric Company	Hawaii	PUC	2006-0386	Consumer Advocate	2007	Operating Income, Cost of Service, Rate Design
Maui Electric Company	Hawaii	PUC	2006-0387	Consumer Advocate	2007	Operating Income, Cost of Service, Rate Design
Peoples Gas / North Shore Gas Company	Illinois	ICC	07-0241 07-0242	Attorney General	2007	Rate Adjustment Clauses

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Commonwealth Edison	Illinois	ICC	07-0566	Attorney General, City	2008	Ratemaking Policy, Rate Trackers
Illinois Power Company, Illinois Public Service Co., Central Illinois Public Service Co	Illinois	ICC	07-0585 cons.	Attorney General/CUB	2008	Rate Adjustment Clauses
Southwestern Public Service Company	Texas	PUCT	35763	Municipalities	2008	Operating Income, Rate Base, Affiliate Transactions
The Gas Company	Hawaii	PUC	2008-0081	Consumer Advocate	2009	Operating Income, Rate Base, Affiliate Transactions, Cost of Service, Rate Design
Hawaiian Electric Company	Hawaii	PUC	2008-0083	Consumer Advocate	2009	Operating Income, Rate Base, Affiliate Transactions, Cost of Service, Rate Design
Commonwealth Edison	Illinois	ICC	2009-0263	Attorney General	2009	Rate Adjustment Clauses
Avista Corporation	Washington	WUTC	UG-060518	Attorney General	2009	Rate Adjustment Clauses
Kauai Island Utility Cooperative	Hawaii	PUC	2009-0050	Consumer Advocate	2009	Operating Income, Cooperative Ratemaking Policies, Cost of Service
Maui Electric Company	Hawaii	PUC	2009-0163	Consumer Advocate	2010	Operating Income, Rate Base, Cost of Service, Rate Design
Hawaii Electric Light Company	Hawaii	PUC	2009-0164	Consumer Advocate	2010	Operating Income, Rate Base, Cost of Service, Rate Design
Commonwealth Edison	Illinois	ICC	2010-0467	AG / CUB	2010	Operating Income, Rate Base
Commonwealth Edison	Illinois	ICC	2010-0527	Attorney General	2010	Alternative Regulation
Atmos Pipeline - Texas	Texas	RCT	GUD 10000	ATM Cities	2010	Operating Income, Rate Base, Cost of Service, Rate Adjustment Clause
Ameren Missouri	Missouri	PSC	2011-0028	Industrial Customers	2011	Operating Income, Rate Base
Hawaiian Electric Company	Hawaii	PUC	2010-0080	Consumer Advocate	2011	Operating Income, Rate Base, Affiliate Transactions, Cost of Service, Rate Design
Utilities, Inc.	Illinois	ICC	11-0561..0566	Attorney General	2011	Operating Income, Rate Base, Rate Design

Michael L. Brosch

Utilitech, Inc. – President
Bachelor of Business Administration (Accounting)
University of Missouri-Kansas City (1978)
Certified Public Accountant Examination (1979)

GENERAL

Mr. Brosch serves as the director of regulatory projects for the firm and is responsible for the planning, supervision and conduct of firm engagements. His academic background is in business administration and accounting and he holds CPA certificates in Kansas and Missouri. Expertise is concentrated within regulatory policy, financial and accounting areas with an emphasis in revenue requirements, business reorganization and alternative regulation.

EXPERIENCE

Mr. Brosch has supervised and conducted the preparation of rate case exhibits and testimony in support of revenue requirements and regulatory policy issues involving more than 100 electric, gas, telephone, water, and sewer proceeding across the United States. Responsible for virtually all facets of revenue requirement determination, cost of service allocations and tariff implementation in addition to involvement in numerous utility merger, alternative regulation and other special project investigations.

Industry restructuring analysis for gas utility rate unbundling, electric deregulation, competitive bidding and strategic planning, with testimony on regulatory processes, asset identification and classification, revenue requirement and unbundled rate designs and class cost of service studies.

Analyzed and presented testimony regarding income tax related issues within ratemaking proceedings involving interpretation of relevant IRS code provisions and regulatory restrictions.

Conducted extensive review of the economic impact upon regulated utility companies of various transactions involving affiliated companies. Reviewed the parent-subsidary relationships of integrated electric and telephone utility holding companies to determine appropriate treatment of consolidated tax benefits and capital costs. Sponsored testimony on affiliated interests in numerous Bell and major independent telephone company rate proceedings.

Has substantial experience in the application of lead-lag study concepts and methodologies in determination of working capital investment to be included in rate base.

Conducted alternative regulation analyses for clients in Arizona, California, Hawaii, Texas and Oklahoma, focused upon challenges introduced by cost-based regulation, incentive effects available through alternative regulation and balancing of risks, opportunities and benefits among stakeholders.

Mr. Brosch managed the detailed regulatory review of utility mergers and acquisitions, diversification studies and holding company formation issues in energy and telecommunications transactions in multiple states. Sponsored testimony regarding merger synergies, merger accounting and tax implications, regulatory planning and price path strategies. Traditional horizontal utility mergers as well as leveraged buyouts of utility properties by private equity investors were addressed in several states.

Analyzed the regulation of telephone company publishing affiliates, including the propriety of continued imputation of directory publishing profits and the valuation of publishing affiliates, including the identification and quantification of intangible assets and benefits of affiliation with the regulated business in Arizona, Indiana, Washington and Utah.

WORK HISTORY

- 1985 - Present **Principal** - Utilitech, Inc. (Previously Dittmer, Brosch and Associates, Inc.)
- 1983 - 1985: **Project manager** - Lubow McKay Stevens and Lewis.
Responsible for supervision and conduct of utility regulatory projects on behalf of industry and regulatory agency clients.
- 1982 - 1983: **Regulatory consultant** - Troupe Kehoe Whiteaker and Kent.
Responsible for management of rate case activities involving analysis of utility operations and results, preparation of expert testimony and exhibits, and issue development including research and legal briefs. Also involved in numerous special projects including financial analysis and utility systems planning. Taught firm's professional education course on "utility income taxation - ratemaking and accounting considerations" in 1982.
- 1978 - 1982: **Senior Regulatory Accountant** - Missouri Public Service Commission.
Supervised and conducted rate case investigations of utilities subject to PSC jurisdiction in response to applications for tariff changes. Responsibilities included development of staff policy on ratemaking issues, planning and evaluating work of outside consultants, and the production of comprehensive testimony and exhibits in support of rate case positions taken.

OTHER QUALIFICATIONS

- Bachelor of Business Administration - Accounting, 1978
University of Missouri - Kansas City "with distinction"
- Member American Institute of Certified Public Accountants
Missouri Society of Certified Public Accountants
Kansas Society of Certified Public Accountants
- Attended Iowa State Regulatory Conference 1981, 1985
Regulated Industries Symposium 1979, 1980
Michigan State Regulatory Conference 1981
United States Telephone Association Round Table 1984
NARUC/NASUCA Annual Meeting 1988, Speaker
NARUC/NASUCA Annual Meeting 2000, Speaker
NASUCA Regional Consumer Protection Meeting 2007, Speaker
- Instructor INFOCAST Ratemaking Courses
Arizona Staff Training
Hawaii Staff Training

AG/AARP Ex. 1.3 Public & Redacted

Commonwealth Edison Company
Net Revenue Requirement Computation

AG/AARP EXHIBIT 1.3
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Line	Description (a)	Sch FR A-1 ComEd Proposed Revenue Requirement Amount (\$ in 000s)	AG/AARP Witness Brosch Retemaking Adjustments							Sum of Effron Adjustments AG/AARP Ex. 2.1 (j)	AG/AARP REVENUE REQUIREMENT (k)
		CWC Page 2 (c)	Allocations Note 1 (d)	Awards/ Percs Page 3 (e)	Incentives Page 4 (f)	Conceded Page 5 (g)	Contributions Page 6 (h)	Deposit Interest p7 (i)			
Operating Expense											
1	Distribution Expense	\$ 312,853									\$ 312,853
2	Customer Acct Expense	178,911									178,911
3	Customer Service and Informational Expense	10,535									10,535
4	A&G Expense	341,550			(2,128)	(6,268)	(749)				332,404
5	Depreciation and Amort Expense	389,584		(492)							389,092
6	Depreciation and Amort Expense - Forecast	15,967									15,987
7	Taxes Other Than Income	109,085		(3,345)							105,740
8	Regulatory Asset Amort	7,335									7,335
9	Pension Asset Funding Cost	34,548								323	34,871
10	Other Expense Adjs	22,321							0		22,321
11	Total Operating Expenses	1,422,689	0	(3,837)	(2,128)	(6,268)	(749)	0	0	323	1,410,029
12	Rate Base	\$ 6,647,036	(78,893)	(18,197)	(492)	33				(378,455)	\$ 6,171,033
13	Pre-Tax Wtd Avg Cost of Capital (%)	8.12%	8.12%	8.12%	8.12%	8.12%	8.12%	8.12%	8.12%	8.12%	8.12%
14	Authorized Return	\$ 539,739	\$ (6,406)	\$ (1,478)	\$ (40)	\$ -	\$ 3	\$ -	\$ -	\$ (30,730)	\$ 501,077
15	Interest Synchronization Deduction	(93,522)	1,110	258	7	0	(0)	0	0	5,325	(88,824)
16	After Tax Return on Rate Base	\$ 446,217	\$ (5,296)	\$ (1,222)	\$ (33)	\$ -	\$ 2	\$ -	\$ -	\$ (25,405)	\$ 414,253
17	Incremental Tax Gross Up Factor (%)	65.961%	65.961%	65.961%	65.961%	65.961%	65.961%	65.961%	65.961%	65.961%	65.961%
18	Incremental Tax Gross Up	\$ 294,329	\$ (3,493)	\$ (806)	\$ (22)	\$ -	\$ 1	\$ -	\$ -	\$ (16,757)	\$ 273,245
19	ITCs and Permanent Tax Differences	(3,950)									(3,950)
20	Authorized Return Grossed Up for Taxes	\$ 736,596	\$ (8,789)	\$ (2,028)	\$ (55)	\$ -	\$ 3	\$ -	\$ -	\$ (42,162)	\$ 683,548
21	Revenue Requirement before Other Revenues	2,159,285	(8,789)	(5,865)	(2,183)	(6,268)	(746)	0	0	(41,839)	2,093,577
22	Other Revenues	128,894									128,894
23	Revenue Requirement	\$ 2,030,391	\$ (8,789)	\$ (5,865)	\$ (2,183)	\$ (6,268)	\$ (746)	\$ -	\$ -	\$ (41,839)	\$ 1,964,683
24	Reconciliation of Prior Yr	0		Note 2							0
25	Net Revenue Requirement	\$ 2,030,391	(8,789)	(5,866)	(2,183)	(6,268)	(746)	0	0	(41,839)	\$ 1,964,683
26	Prior Yr Applicable Net Revenue Requirement	2,084,072									2,084,072
27	Change In Net Revenue Requirement From Prior Yr	\$ (53,681)									\$ (119,369)

Footnotes:

- Amounts for G&I Plant are provided in ComEd responses to Staff PR 1.02 (Supplemental) and for property taxes in CUB 3.01.
- See Brosch Testimony regarding alternative adjustment to Late Payment Charge revenue credits if ComEd's proposed G&I Plant Allocation change is approved by the Commission. Revenues at line 22 would increase by \$ 2,647

Commonwealth Edison Company
Cash Working Capital Calculation

ComEd Ex. 8.1 TB CWC - Reformatted

AG/AARP CWC Revisions

Line No.	Cash Flow Elements (a)	Amount \$000 (b)	Revenue Lag Days (c)	Expense Lead Days (d)	Net Lag Days (e)	CWC Factor (f)	CWC Required (g)	Revenue Lag Days (h)	Expense Lead Days (i)	Net Lag Days (j)	CWC Factor (k)	CWC Required (l)
1	Base Payroll and Withholdings	\$ 264,611	51.25	15.05	36.20	0.0992	\$ 26,244	46.08	15.05	31.03	0.0850	\$ 22,496
2	Employee Benefits - Pension and OPEB	112,785	51.25	0	51.25	0.1404	15,836	46.08	0	-	-	-
3	Employee Benefits - Other	52,652	51.25	4.95	46.30	0.1268	6,679	46.08	4.95	41.13	0.1127	5,933
4	Inter Company Billings - Less Pass Thrus	91,985	51.25	30.55	20.70	0.0567	5,217	46.08	45.35	0.73	0.0020	184
5	Inter Company Billings - Pass Thrus	32,391	51.25	30.55	20.70	0.0567	1,837	46.08	45.35	0.73	0.0020	85
6	Property Leases	29,778	51.25	6.33	44.92	0.1231	3,665	46.08	6.33	39.75	0.1089	3,243
7	Other O&M Expense	242,976	51.25	66.82	(15.57)	(0.0427)	(10,365)	46.08	66.82	(20.74)	(0.0568)	(13,606)
8	Property/Real Estate Taxes	15,162	51.25	339.12	(287.67)	(0.7887)	(11,958)	46.08	339.12	(293.04)	(0.8026)	(12,173)
9	FICA Contributions	20,321	51.25	15.05	36.20	0.0992	2,015	46.08	15.05	31.03	0.0850	1,728
10	Federal Unemployment Tax	234	51.25	75.63	(24.38)	(0.0668)	(16)	46.08	75.63	(29.55)	(0.0810)	(19)
11	State Unemployment Tax	371	51.25	75.63	(24.38)	(0.0668)	(25)	46.08	75.63	(29.55)	(0.0810)	(30)
12	Electricity Distribution Tax	66,890	51.25	30.13	21.12	0.0579	3,870	46.08	30.13	15.95	0.0437	2,923
13	State Franchise Tax	1,582	51.25	190.67	(139.42)	(0.3820)	(804)	46.08	190.67	(144.59)	(0.3961)	(627)
14	City of Chicago Dark Fiber Tax	-	51.25	0	51.25	0.1404	-	46.08	0	46.08	0.1262	-
15	State Public Utility Fund	3,869	51.25	37.67	13.58	0.0372	144	46.08	37.67	6.41	0.0230	89
18	Illinois Sales and Use Tax	561	51.25	2.66	48.59	0.1331	75	46.08	2.66	43.42	0.1190	67
17	Chicago Sales and Use Tax	21	51.25	37.46	13.79	0.0378	1	46.08	37.46	8.62	0.0236	0
18	Interest Expense	235,305	51.25	91.13	(39.88)	(0.1093)	(25,709)	46.08	91.13	(45.05)	(0.1234)	(29,042)
19	Current State Income Tax	(33,097)	51.25	37.88	13.37	0.0366	(1,212)	46.08	37.88	8.20	0.0225	(744)
20	Current Federal Income Tax	(212,656)	51.25	37.88	13.37	0.0366	(7,790)	46.08	37.88	8.20	0.0225	(4,777)
21	Energy Assistance/Renewable Energy	46,376	51.25	30.05	21.20	0.0581	2,694	46.08	35.2	(35.20)	(0.0964)	(4,472)
22	Gross Receipts/Municipal Utility Tax	238,383	51.25	44.22	7.03	0.0193	4,591	46.08	44.22	(44.22)	(0.1212)	(26,660)
23	Illinois Excise Tax	247,941	51.25	4.12	47.13	0.1291	32,015	46.08	4.12	41.96	0.1150	26,503
24	Infrastructure Maintenance Fee	91,819	51.25	43.46	7.79	0.0213	1,960	46.08	43.46	2.62	0.0072	659
25	Total Receipts and Outlays	1,550,260					\$ 49,163					\$ (26,682)
26	Accounts Payable Related to CWIP	1,283	0	66.82	(66.82)	(0.1831)	(235)					(1,263)
27	TOTAL CASH WORKING CAPITAL					Note 1	\$ 48,928				Note 2	\$ (29,965)
28	ADJUSTMENT TO COMPANY PROPOSED CASH WORKING CAPITAL											\$ (78,883)

Footnotes:

- Differs slightly from ComEd Ex. 8.1 TB amount \$48,931 due to rounding.
- All amounts in column (b) should be updated in the final Order

Commonwealth Edison Company
Adjustment to Awards and Perquisites

<u>Line No.</u>	<u>Description</u> (a)	<u>Total</u> (b)	<u>Jurisdictional</u> (c)
Normalize Retention Awards			
1	2007	\$ 229	
2	2008	967	
3	2009	1425	
4	2010	4,280	
5	4 year average	<u>1,725</u>	
6	Reduction to 2010	2,555	
7	Expense Reduction	2,010	\$ 1,793
8	Capital Reduction	545	427
Performance Base Awards			
9	2010	360	
10	50% Reduction	180	
11	Expense Reduction	149	132
12	Capital Reduction	32	25
Other Stock Awards And Perquisites			
13	2010	570	
14	Removed on WPC-1c	<u>(292)</u>	
15	Total in Revenue Requirement	278	
16	Expense Reduction	227	203
17	Capital Reduction	51	40
18	TOTAL ADJUSTMENT TO EXPENSE (Minus Lines 7+11+16)		<u>\$ (2,128)</u>
19	TOTAL ADJUSTMENT TO CAPITAL (Minus Lines 8+12+17)		<u>\$ (492)</u>

Source: All information from ComEd's Response to AG 4.08, Attachment 1, Page 2

Commonwealth Edison Company
 Incentive Compensation Disallowance

PUBLIC
 and REDACTED

<u>Line No.</u>	<u>Description</u> (a)	<u>Source</u> (b)	<u>Jurisdictional</u> <u>Expense \$000.</u> (c)
1	Exelon BSC Charges to ComEd Expenses	AG 6.08g	\$ [REDACTED]
2	Times: Amount of Line 1 Tied to Earnings per Share	AG 6.08e	75%
3	BSC Annual Incentive Plan Disallowance	Line 1 * Line 2	[REDACTED]
4	Eliminate Philadelphia Electric AIP Charges to ComEd	AG 6.08f	[REDACTED]
5	Eliminate ComEd Stock-based Key Manager LTIP accruals	ComEd Ex. 4.9, p.3	(1,921)
6	TOTAL AG/AARP INCENTIVE COMPENSATION DISALLOWANCE		\$ (6,268)

Commonwealth Edison Company
Adjustments Conceded by ComEd

<u>Line No.</u>	<u>Description</u> (a)	<u>Source</u> (b)	<u>Expense</u> <u>Amount \$000</u> (c)	
1	Legal Fees for IRS Dispute re: Gain on Generating Unit Sale	CUB 2.05	\$ (776)	
2	Times: Jurisdictional Allocation - W&S Factor	ComEd Sch FR A-2	<u>89.22%</u>	
3	Jurisdictional Amount	Line 1 * Line 2	(692)	
4	Sporting Event Tickets/Catering	ST 1.01	(57)	33
5	TOTAL OF ADJUSTMENTS CONCEDED BY COMED	Line 3 + Line 4	\$ (749) \$	33

<u>Line No.</u>	<u>Description</u>	<u>Source</u>	<u>Expense</u> <u>Amount \$000</u>
	(a)	(b)	(c)

This Schedule is a place holder for future adjustment of ComEd charitable contributions as more fully described in AG/AARP Exhibit 1.0 (Brosch Testimony)

Commonwealth Edison Company
Adjustment to Include Interest on Customers' Deposits

<u>Line No.</u>	<u>Description</u> (a)	<u>Source</u> (b)	<u>Expense</u> <u>Amount \$000</u> (c)
1	Test Year Customer Deposits in Rate Base	ComEd App2, p.4	\$ 129,534
2	ICC Interest Rate on Customers' Deposits		<u>0.00%</u>
3	AG/AARP ADJUSTMENT TO INCLUDE CUSTOMER DEPOSIT INTEREST	Line 1 * Line 2	<u>\$ -</u>

ICC Docket No. 11-0721**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests****RMP 1.01-1.10****Date Received: November 16, 2011****Date Served: November 30, 2011****REQUEST NO. RMP 1.01:**

Please provide the 10-year forecasted income statement, balance sheet, statement of cash flows, ratemaking capital structure. With those forecasted financial statements, please provide the following:

- A) Capital expenditures broken down into the following categories:
 - 1. Electric system upgrades, modernization projects and training facilities (as defined in Section 16-108.5(b)(1)); and
 - 2. Transmission and distribution infrastructure upgrades and modernization and smart grid electrical system upgrades (as defined in Section 16-108.5(b)(2)).

- B) Revenues broken down into the following categories;
 - 1. ICC jurisdictional revenues;
 - 2. FERC jurisdictional revenues; and
 - 3. Other.

- C) Components of the rate of return for formula rate:
 - 1. 30-year U.S. Treasury bond yield;
 - 2. Embedded cost of long-term debt;
 - 3. Cost of short-term debt; and
 - 4. Balance of goodwill.

- D) Sources of forecasted 30-year U.S. Treasury bond yield;

- E) Sources of forecasted cost of short-term debt;

- F) Cost of new long-term debt, including sources relied upon for interest rate forecasts;

- G) Rates of inflation for O&M, including sources relied upon for inflation rate forecasts;

- H) Rates of inflation for capital expenditures, including sources relied upon for inflation rate forecasts;

- I) Sales volume (MWh);

- J) Number of customers;

- K) Externally funded pension contributions; and

- L) Issuer and secured credit ratings.

RESPONSE:

ComEd objects to this request on the grounds that the requested information is not relevant to this proceeding and is not likely to lead to the discovery of admissible evidence. ComEd further objects to the time frame set forth in the request as overly burdensome because ComEd's standard planning process covers a five-year period as opposed to the ten-year period set forth in the request. Subject to the foregoing objections, and in accordance with the agreement reached with ICC Staff, ComEd has included the current year forecast and five years of projected financials in this response.

Please refer to RMP 1.01_Attach 1 (CONFIDENTIAL and PROPRIETARY) for five (5) years of forecasted financial statements (income statement, balance sheet, statement of cash flows, and ratemaking capital structure). All financial information presented in the accompanying attachments is representative of only ComEd Company (i.e., excludes ComEd of Indiana, RITE IL, and ComEd Financing III), consistent with information presented in this proceeding. This information reflects preliminary project and budget estimates provided to the ComEd Board of Directors as of November 29, 2011 and is representative of ComEd Company's financial outlook assuming the enactment of HB 3036.

All information included in this response is subject to change over time and is provided on a confidential basis.

- A) Please refer to the attachment labeled as RMP 1.01_Attach 2 (CONFIDENTIAL and PROPRIETARY).
- B) Please refer to the attachment labeled as RMP 1.01_Attach 3 (CONFIDENTIAL and PROPRIETARY).
- C) Please refer to the attachment labeled as RMP 1.01_Attach 4 (CONFIDENTIAL and PROPRIETARY).
- D) Please refer to the attachment labeled as RMP 1.01_Attach 5.
- E) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- F) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- G) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- H) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- I) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).

- J) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- K) Please refer to the attachment labeled as RMP 1.01_Attach 6 (CONFIDENTIAL and PROPRIETARY).
- L) Please refer to the attachment labeled as RMP 1.01_Attach 7.

ICC Dkt. No. 11-0721
RMP 1.01_ Attach 1 Public – Redacted

ICC Dkt. No. 11-0721
RMP 1.01_ Attach 2 Public – Redacted

ICC Dkt. No. 11-0721
RMP 1.01_ Attach 3 Public – Redacted

ICC Dkt. No. 11-0721
RMP 1.01_ Attach 4 Public – Redacted

Commonwealth Edison Company

30-Year Treasury Bond Yields

Source: Bloomberg financial database.

for explanation. Corp FWCM

Screen Printed

Forward Curve Matrix

Templates Options View Base Curve CustomTemplate

Country Market Yield Display

Tenor	Forwards								
	1m	2m	3m	4m	5m	6m	7m	8m	9m
1m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
6m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
1yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
5yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
7yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
10yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
30yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Single Currency Rates/Spreads

Australia 61 2 9777 8000 Brazil 5511 3048 4500 Europe 44 30 7330 7500 Germany 49 69 9304 1210 Hong Kong 852 3927 8000
 Japan 81 3 3201 8900 Singapore 65 6212 1000 U.S. 1 312 313 3000 Copyright 2011 Bloomberg Finance L.P.
 SN 615492 6660-1068-3 01-Nov-11 15:56:31 CDT GMT-5:00

for explanation. Corp FWCM

Screen Printed

Forward Curve Matrix

Templates Options View Base Curve CustomTemplate

Country Market Yield Display

Tenor	Forwards									
	10m	11m	1yr	15m	18m	21m	2yr	3yr	4yr	5yr
1m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
6m	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
1yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
2yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
3yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
5yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
7yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
10yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
30yr	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

Single Currency Rates/Spreads

Australia 61 2 9777 8000 Brazil 5511 3048 4500 Europe 44 30 7330 7500 Germany 49 69 9304 1210 Hong Kong 852 3927 8000
 Japan 81 3 3201 8900 Singapore 65 6212 1000 U.S. 1 312 313 3000 Copyright 2011 Bloomberg Finance L.P.
 SN 615492 6660-1068-3 01-Nov-11 15:56:31 CDT GMT-5:00

Commonwealth Edison Company

30-Year Treasury Bond Yields

Source: Bloomberg financial database.

for explanation. Corp FWCM

Forward Curve Matrix

Templates Options View Base Curve CustomTemplate

Country Curve Market Yield Display

Tenor	Forwards				
	5yr	7yr	8yr	9yr	10yr
1m	0.0000	0.0000	0.0000	0.0000	0.0000
3m	0.0000	0.0000	0.0000	0.0000	0.0000
6m	0.0000	0.0000	0.0000	0.0000	0.0000
1yr	0.0000	0.0000	0.0000	0.0000	0.0000
2yr	0.0000	0.0000	0.0000	0.0000	0.0000
3yr	0.0000	0.0000	0.0000	0.0000	0.0000
5yr	0.0000	0.0000	0.0000	0.0000	0.0000
7yr	0.0000	0.0000	0.0000	0.0000	0.0000
10yr	0.0000	0.0000	0.0000	0.0000	0.0000
30yr	0.0000	0.0000	0.0000	0.0000	0.0000

Single Currency Rates/Spreads

Australia 61 2 2000 2000 Brazil 5511 5048 4500 Europe 44 20 7530 7500 Germany 49 89 2001 1310 Hong Kong 852 2207 2000
Japan 81 2 3201 2200 Singapore 65 6212 1000 U.S. 1 312 318 2000 Copyright 2011 Bloomberg Finance L.P.
SI 815452 6600-1568-2 01-Nov-11 15:57:40 CDT GMT-5:00

ICC Dkt. No. 11-0721
RMP 1.01_ Attach 6 Public – Redacted

Commonwealth Edison Company

S&P				
Instrument	Rating	Rating Date	Prior Rating	Company
Corporate credit	BBB	7/22/2009	BBB-	ComEd
Senior secured debt	A-	7/22/2009	BBB+	ComEd
Senior unsecured debt	BBB	7/22/2009	BBB-	ComEd
Commercial paper	A2	7/22/2009	A3	ComEd

Moody's				
Instrument	Rating	Rating Date	Prior Rating	Company
Senior secured debt	Baa1	8/3/2009	Baa2	ComEd
Senior unsecured debt	Baa3	10/3/2008	Ba1	ComEd
Issuer rating	Baa3	10/3/2008	Ba1	ComEd
Commercial paper	P-3	10/3/2008	Not Prime	ComEd

Fitch				
Instrument	Rating	Rating Date	Prior Rating	Company
Issuer default rating	BBB-	1/25/2010	BB+	ComEd
Senior secured debt	BBB+	1/25/2010	BBB	ComEd
Senior unsecured debt	BBB	1/25/2010	BBB-	ComEd
Trust preferred stock	BB+	1/25/2010	BB	ComEd
Preferred stock	BB+	1/25/2010	BB	ComEd
Commercial paper	F3	1/25/2010	B	ComEd

**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: December 22, 2011

REQUEST NO. AG 4.08:

Ref: ComEd Responses to AG 1.06, page 3; AG 1.14, page 2 (Perquisites and Awards).

According to the response, "ComEd believes that expenditures for perquisites and awards are reasonable business expenses that provide benefits to customers." Please provide the following additional information relative to this statement:

- a. Explain each reason why ComEd believes that perquisites and awards "provide benefits to customers" and provide copies of all reports, analyses, workpapers studies and other documents associated with your response.
- b. State with specificity each reason whether/why ComEd believes the Commission's Final Order in Docket No. 10-0467 did not reasonably address the ratemaking treatment of perquisite and award expenses.
- c. Provide a calculation of the additional adjustment that would be required to apply the Docket No. 10-0467 treatment to recorded 2010 perquisite and awards costs.

RESPONSE:

- a. There are several reasons why perquisites and awards provide benefits to customers. Among them are the following. First, awards such as retention awards encourage key, high performing personnel filling critical roles to stay with ComEd and continue to deliver value to customers. Next, special recognition awards provide an incentive for employees to "go above and beyond" the normal level of expectations. For example, special recognition rewards may be given for a high level of customer assistance or working extra hours to get a job completed on-time and under budget. Finally, performance awards, such as meter reading awards, provide incentive for employees to continually strive to attain high levels of performance throughout the year.
- b. The adjustment made to ComEd's perquisite and awards in ICC Docket No. 10-0467 included a normalization of retention awards, a 50/50 "sharing" of performance awards and exclusion of the Other Stock Awards and Executive Perquisites not already removed in the voluntary executive compensation adjustment. ComEd continues to believe that these are reasonable costs which benefit customers. With respect to the normalization of retention awards, a normalization adjustment is no longer necessary or appropriate now that ComEd has transitioned to a formula rate. Normalization adjustments (with the exception of certain costs identified in the legislation), commonly used with stated, or fixed rates, are no longer needed as costs will adjust each year and higher and lower expenses will be reflected in rates. With respect to performance awards, ComEd does not believe the 50/50 sharing is warranted as performance awards are designed to promote a high performance culture which will ultimately result in a higher standard of service to

customers. Finally, ComEd has already voluntarily removed approximately \$119,000 of perquisites and \$984,000 of other awards (see ComEd Ex. 4.2, WP 7, Page 13) which is a sharing of costs with shareholders and customers. See also ComEd's Application for Rehearing, ICC Docket No. 10-0467 at 26.

- c. See the attachment labeled as AG 4.08 Attach 1, Page 2.

Commonwealth Edison Company
Perquisites and Other Awards Included in 2010 Jurisdictional Test Year
(in thousands)

	(A)	(B)	(C)	(D)	(E)	(F)	(D)	(E)	(F)
	Retention Awards	Performance Based Awards	Performance, Signing Bonus And Other Awards	Other Stock Awards	Executive Perquisites	Less: Perquisites and Other Stock Excluded in WPC-1c (2)	Sub Total	Jurisdictional Percentage Charged to C-1	Amount Included in C-1 (3)
Transmission	266	-	1	-	-	-	267	0.0%	-
Distribution	75	62	6	-	-	-	143	100.0%	143
Customer Accounts	97	-	770	-	-	-	867	100.0%	867
Customer Service	62	-	-	-	-	-	62	100.0%	62
A&G	2,867	235	270	375	144	(292)	3,599	89.2%	3,211
Total Expense	3,367	297	1,047	375	144	(292)	4,938		4,283
Total Charged to Capital - Other Accounts (1)	913	63	82	51	-	-	1,109	78.4%	870

(1) Primarily capital, allocated using the gross plant allocator on WPA-5, page 2

(2) WPC-1c includes a reduction for Other Stock Awards of \$173 and Perquisites of \$119

(3) Includes \$814 in costs from affiliates

(4) Includes \$250 in costs from affiliates

Commonwealth Edison Company
in 000s

	Total	Jurisdictional
Normalize Retention Awards		
1 2007	229	
2 2008	967	
3 2009	1425	
4 2010	<u>4,280</u>	
5 4 year average	1,725	
6 Reduction to 2010	2,555	
7 Expense Reduction	2,010	1,793
8 Capital Reduction	545	427
Performance Base Awards		
9 2010	360	
10 50% Reduction	180	
11 Expense Reduction	149	132
12 Capital Reduction	32	25
Other Stock Awards And Perquisites		
13 2010	570	
14 Removed on WPC-1c	<u>(292)</u>	
15 Total in Revenue Requirement	278	
16 Expense Reduction	227	203
17 Capital Reduction	51	40

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 1.01 – 1.30**

Date Received: November 16, 2011

Date Served: December 1, 2011

REQUEST NO. AG 1.15:

Ref: ComEd Ex. 4.9, pages 3 and 19-20 (LTI Restricted Stock Awards).

Please provide, for calendar year 2010, the following information regarding LTI Restricted Stock program expenses:

- a. Identify each of the Key Managers within each Exelon business unit for whom ComEd recorded expenses in 2010 associated with the LTI Restricted Stock Award Program.
- b. Provide the amounts of restricted stock grants, in shares and dollar value, awarded to each of the individuals named in your response to part (a).
- c. Explain in detail each of the performance criteria that were employed to determine the stock grant amounts for each individual identified in your response to part (a).
- d. Provide the monthly accruals to expense and other accounts, by FERC Account, associated with ComEd's charges associated with the Exelon LTI Restricted Stock Plan.
- e. Explain why the portion of total 2010 accrued expense for LTI Restricted Stock that is included in the Company's asserted revenue requirement, at page 3, is believed to be reasonable, indicating the basis for such recovery in light of statutory criteria.

RESPONSE:

- a. ComEd objects to providing information as to individuals on grounds that the requested information is not relevant and not reasonably likely to lead to the discovery of admissible evidence and further would constitute an invasion of the privacy of the individuals involved. Subject to and without waiving this objection, the amounts provided on page 3 of ComEd Ex. 4.9 represent Restricted Stock awarded to 137 ComEd Key Managers and Directors.
- b. A total of 53,670 shares were awarded to the Key Managers and Directors discussed in part a with a grant price of \$46.09/share.
- c. ComEd objects to providing information as to individuals on grounds that the requested information is not relevant and not reasonably likely to lead to the discovery of admissible evidence and further would constitute an invasion of the privacy of the individuals involved. Subject to and without waiving this objection, ComEd notes that while individual performance may apply in the determination of the amount of specific awards, the primary objective of the program is to attract and retain key employees.
- d. Please see ComEd's Response to Staff Data Request TEE 1.08 and its attachment labeled as TEE 1.08_Attach 1 for the monthly LTI Restricted Stock Plan accruals to expense.

- e. Key manager compensation is a combination of base salary, AIP subject to achievement of operational metrics, and Restricted Stock awards. The restricted stock program is designed to attract and retain talented employees to contribute to the continued reliable delivery of electricity. To assure that compensation is set at market rates, the annual incentive compensation levels, including the use of restricted stock as a form of compensation, are also reviewed on a periodic basis by Towers Watson.

ICC Docket No. 11-0721**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests****AG 1.01 – 1.30****Date Received: November 16, 2011****Date Served: December 1, 2011****REQUEST NO. AG 1.06:****Ref: ComEd Ex. 4.1 (Formula Rate Schedules).**

Does ComEd contend that its proposed revenue requirement presented in Exhibit 4.1 complies with each of the Commission's ratemaking findings in Docket No. 10-0467 except for return on equity? If not, please identify and quantify each departure from ICC-Ordered ratemaking policies and procedures that is reflected in Exhibit 4.1 with an explanation of the basis for each such departure.

RESPONSE:

No. Although ComEd Ex. 4.1 conforms with most of the Commission's ratemaking findings in ICC Docket No. 10-0467, it does not conform with some as they are either not applicable, not requested, addressed through the legislation, or differ for the reasons explained below. ComEd has identified differences between the Commission's final Order in ICC Docket No. 10-0467 and the proposed revenue requirement presented in ComEd Ex. 4.1 but has not completed any analysis to quantify differences. Note that the Direct Testimony of Kathryn Houtsma discusses four (4) differences in methodology (see ComEd Ex. 2.0 at 28:585 - 30:628) between the final Order in ICC Docket No. 10-0467 and the amounts proposed in ComEd Ex. 4.1.

Below is an itemization of the Commission's ratemaking findings as identified in Appendix A of the final Order in ICC Docket No. 10-0467, as well as several other adjustments not shown on Appendix A, but included in the final Order, and a description of how they are addressed in the formula rate schedules.

Please also see ComEd's Response to Staff Data Request TEE 1.03.

The following items are treated in the same manner as in the Commission's final Order in ICC Docket No. 10-0467:

Item	Notes
PORCB adjustment	Removed capital costs related to software and the corresponding depreciation expense. See ComEd Ex. 4.1, Appendix 1 and ComEd Ex. 4.1, Appendix 8 to the formula rate
Charitable contributions	Removed certain contributions to organizations outside ComEd's service territory.
Late payment charges	Applied 100% of late payment charges not previously allocated to transmission to distribution revenues. See ComEd Ex. 4.1, Appendix 10 to the formula rate.

Materials and supplies adjustment	Uses the 13 month average and reduces the balance by the associated accounts payable. See ComEd Ex. 4.1, Appendix 1 to the formula rate and ComEd Ex. 4.2, WP 14
Corporate jet costs	Removed 50% of the costs from the revenue requirement. See ComEd Ex. 4.1, Appendix 7 to the formula rate.
Rate relief payments totaling \$3M	Excluded credit to other revenues. See ComEd Ex. 4.1, Appendix 10 to the formula rate.
Investment tax credit	Amortization of investment tax credits are included as a reduction to the revenue requirement.
Customer deposits	Reduced distribution rate base by 100% of customer deposits net of associated interest

The following adjustments made in the final Order in ICC Docket No. 10-0467 are not applicable to this filing because the treatment was prescribed in the legislation:

Item	Notes
2009 pension asset funding	Pension assets earn a return equal to the embedded cost of long-term debt
2005 pension asset funding	Pension assets earn a return equal to the embedded cost of long-term debt.
Pro forma plant additions	Included one year of projected plant additions.

The following adjustments made in the final Order in ICC Docket No. 10-0467 are not applicable to this filing as they relate to the timing of incurred costs or for the reasons indicated below:

Item	Notes
Intangible plant amortization	Adjustment in ICC Docket No. 10-0467 was due to amortization based on a cut-off date in 2011.
Miscellaneous fees	ComEd makes no adjustment in miscellaneous fees because the adjustment in ICC Docket No. 10-0467 was due to timing.
Revenues for new business	Adjustment in 10-0467 was due to timing.
Rate case expenses for the instant proceeding	These costs are not being requested for recovery in this proceeding as none were incurred in 2010.
2010 wages and salaries increase	Adjustment due to timing of incurred expense. Changes will be captured in the 2011 reconciliation.
State tax adjustment	The filing uses 2010 actual tax rates. New tax rates will reflect in the 2011 reconciliation.
Jacobs Consulting	No costs associated with this study were recorded in 2010.
Adjustment for bad debt associated with the updated revenue requirement	Actual bad debt amount will be captured in annual reconciliations.

The following items are treated differently in the current revenue requirement than they were in the final Order in ICC Docket No. 10-0467 for the reasons indicated below:

Item	Notes
Allocation of G&I plant	See the Direct Testimony of Kathryn Houtsma (ComEd Ex. 2.0) for a discussion of ComEd's allocation method for G&I plant.
Restricted stock awards	ComEd believes that since restricted stock awards are not tied to net income or return on equity they are thus appropriately recoverable.
Perquisites and awards	ComEd believes that expenditures for perquisites and awards are reasonable business expenses that provide benefits to customers.
Sporting activity expense	Adjustment will be made in rebuttal testimony as described in ComEd's Response to Staff Data Request ST 1.01.
Legal fees related to fossil sale	ComEd will remove these fees in rebuttal testimony.
Interest on Customer deposits included in Operating Expenses	ComEd would consider adjusting operating expenses to account for the interest payments. See ComEd's Response to Staff Data Request JMO 1.04.
Cash working capital	See the Direct Testimony of John Hengtgen (ComEd Ex. 8.0) for a discussion of the differences between the cash working capital requirement and the final Order in ICC Docket No. 10-0467
Real estate taxes	See the Direct Testimony of Kathryn Houtsma (ComEd Ex. 2.0) for a discussion of the difference in allocation method.
Depreciation expense for pro forma plant additions	See the Direct Testimony of Kathryn Houtsma (ComEd Ex. 2.0) for a discussion of the historical class average approach.
Photovoltaic pilot costs	ComEd has made no adjustment to remove these costs.

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests
AG 1.01 – 1.30**

Date Received: November 16, 2011

Date Served: November 28, 2011

REQUEST NO. AG 1.29:**Ref: ComEd Ex. 8.2 and 8.2 TB, pages 1-4 (Lead Lag Revenue Collection Lag).**

Please state with specificity each data source and calculation assumption for each rate class that was employed to derive the 32.34493 revenue collection lag set forth in these workpapers, indicating for each revenue class how the "Average Monthly \$ Amounts" and "Weighted Days" values were determined.

RESPONSE:

The data source used for the revenue collection lag was accounts receivable aging reports provided by ComEd's Revenue Accounting Department by month for the calendar year 2010.

The following steps were used to calculate the "Average Monthly \$ Amounts" and "Weighted Days" for each customer class.

Step 1 – The 13 month average receivable balance by customer class and aging interval was computed by summing the appropriate amount for each customer class and each interval for each month of the period December 2009 through December 2010 and dividing by 13.

Step 2 – A customer class percentage by interval was calculated for each customer class by taking the 13 month average receivable balances computed in step 1 by interval and dividing by the total of all intervals for that class.

Step 3 – The customer class percentages by interval computed in step 2 above were then multiplied by a midpoint for each customer class and interval resulting in a weighted average collection time by customer class and interval. See response to DGK 1.10 for an explanation of how the midpoints were determined.

Step 4 - The weighted average collection time by customer class and interval computed in Step 3 above were summed to produce weighted days as follows:

Residential	32.36670
SCI	38.23798
LCI	18.70998
Railroad	3.33360
Street Lighting	14.49698
Public Authority	0.11415
Government	8.86638

Step 5 – The average monthly \$ dollar amounts which were calculated in Step 1 above were weighted by customer class to produce the weighted \$ amounts as follows:

Residential	0.6824
SCI	0.2325
LCI	0.0573
Railroad	0.0031
Street Lighting	0.0145
Public Authority	0.0016
Government	0.0086

Step 6 – The weighted days computed in Step 4 were multiplied by the weighted \$ amounts computed in Step 5 and the results were summed to produce a total weighted days of 32.34493.

ICC Docket No. 11-0721

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

AG 1.01 – 1.30

Date Received: November 16, 2011

Date Served: November 28, 2011

REQUEST NO. AG 1.30:

Ref: ComEd Ex. 8.2 and 8.2 TB, page 1 (Lead Lag Revenue Collection Lag).

Please describe in detail Mr. Hengtgen's understanding of why a collection lag of 32.36670 days is reasonable for ComEd's residential customers, when the referenced workpaper suggests that Public Authority customers are remitting payment only 0.11415 days after billings are rendered. For what reasons could it be physically possible for Public Authority customers to remit payment less than one day after bills are rendered?

RESPONSE:

As stated in Mr. Hengtgen's Direct testimony (ComEd Ex. 8.0, lines 100 – 102) the collection lag calculations did not take into consideration the grace period in which customers have to pay their bills. Public Authority customers have 60 days to pay their bills, therefore the midpoint for the 0 – 30 day interval and the 31 – 60 day interval was 0 (see ComEd's Response to Staff Data Request DGK 1.10 for an explanation of how the midpoints were determined). The percentage of total receivables balances over 60 days old for these customers are minimal therefore the result of 0.11415 days appears reasonable.

With respect to residential customers, they have 21 days to pay their bills. Based on the accounts receivable aging data used and as shown on ComEd. Ex. 8.2, the residential class has only 66% of its receivables in the 0 – 30 day interval with the other 34% stretching out as follows:

31-60	14.3%
61-90	7.2%
91-120	4.2%
121-150	2.5%
151-180	1.7%
181-210	1.2%
211-270	1.5%
271-365	1.3%

Based upon these receivable balances and the weighting calculations performed in ComEd Ex. 8.2, it appears reasonable that the residential collection lag calculation is 32.36670 days.

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
DGK 1.01 – 1.12**

Date Received: November 17, 2011

Date Served: November 28, 2011

REQUEST NO. DGK 1.10:

Referring to ComEd Ex. 8.2, midpoints are used in the calculation of revenue collection lag and are presented in rows 80 through 87 of the "Revenue Lag" tab. Please explain why the midpoint of residential average receivable balances outstanding from "0 – 30" is not the midpoint between zero and 30; i.e. 15 days rather than the days presented; zero days in this instance. Please address this issue for all nine columns (0 – 30, 31 – 60, 61 – 90, 91 – 120, 121 – 150, 151 – 180, 181 – 210, 211 – 270 and 271 – 365) where the midpoint presented is not the midpoint between the day range in the column heading.

RESPONSE:

The midpoint amounts have been calculated in the same manner as what was approved in ComEd's last rate case, ICC Docket No. 10-0467. The calculations take into consideration the amount of time (grace period) that customers have to pay their bills. Factoring in the grace period is a conservative assumption across all customer classes and has the result of shortening the collections lag and reducing the amount of cash working capital being requested. For example, SCI and LCI customers have 14 days to pay their bills. The midpoint for the first interval (0 – 30) is 8 days which is half of the 16 days remaining after the 14 day grace period. Therefore 8 days was used for the first interval for SCI and LCI. The midpoints for the second interval onward for each customer category reflect the midpoint of that particular interval with no similar adjustment for the grace period. Therefore, the value for SCI and LCI in the second interval is 45 days.

Residential customers have 21 days to pay their bills so the midpoint after the grace period for the first interval would be 4.5 days. However, based on what was proposed and approved in the last case, ComEd has used 0 days as the midpoint for Residential customers again in this case. This is an additional conservative assumption included in the residential collection lag calculation.

Railroad, Street Lighting and Public Authority customers have 60 days to pay their bills therefore the midpoint for the first two intervals is 0. Government customers have 45 days to pay their bills so the midpoint for the first interval is also 0 and the midpoint for the second interval is 8 (60 – 45 divided by 2). Since these customers have a longer time to pay their bills, all the intervals have been shifted to the right (i.e., the 61-90 interval for Railroad customers is actually the 0-30 interval for them).

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
DGK 1.01 – 1.12
Date Received: November 17, 2011
Date Served: November 28, 2011**

REQUEST NO. DGK 1.11:

Referring to ComEd Ex. 8.2, row 46, the Residential weighted collection lag days is 32.37 days. Is it the Company's position that, on the average, residential customers pay their bills more than 32 days after receipt? If not, please explain.

RESPONSE:

Yes, based on the calculation of the collections lag which includes the impact of grace periods. See ComEd's Response to Staff Data Request DGK 1.10 for a discussion of the grace periods used in the calculation.

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 7.02:****Ref: ComEd Responses to AG 4.18, AG 4.24 and AG 4.25 (Lead Lag Treatment of Reserve for Bad Debts).**

The responses to AG 4.18 indicates that "The reserve for uncollectible accounts has not been incorporated in the calculation of the delivery service rate, nor are the associated customer accounts receivable."(AG 4.18a) Please respond to the following:

- a. Confirm that the Accounts Receivable Balances provided in AG 4.21, Attachment 1 that were used to calculate the revenue collection lag day value used in ComEd Ex. 8.1 were not reduced by the Company's estimated reserve for the portion of such receivables that would ultimately prove to be uncollectible, or explain any inability to confirm this assertion.
- b. Explain each element of the Company's rationale for not reducing the Accounts Receivable balances for estimated uncollectible accounts therein. What is being assumed regarding the timing of cash inflows and outflows for bad debt expenses?
- c. Provide a summary of the Company's recorded monthly 2010 total balance in the Reserve for Uncollectible Accounts (Account 144000) associated with electric sales revenues and late payment charges, that resulted from application of the procedures set forth in the response to AG 4.25 and related attachments.
- d. What overall percentage of ComEd's monthly accounts receivable balances, as set forth in the response to AG 4.21 and used to calculate the revenue collection lag, was offset by the reserve for uncollectibles amounts in each month (using the information provided in response to part c)?
- e. Explain whether and each reason why/if ComEd believes that customers who do not pay their bills at all, causing their recorded accounts receivable to ultimately be written off as uncollectible, should have an impact on calculation of the revenue collection lag days?

RESPONSE:

- a. Yes, the accounts receivable balances were not reduced by the estimated reserve for uncollectible accounts.
- b. ComEd has not reduced the accounts receivable balances for estimated uncollectible amounts primarily for two reasons. First, ComEd does not know with certainty which balances will become uncollectible. Second, even if the amounts become uncollectible they would have to be considered separately in order to determine how long it takes ComEd to recover those amounts and be made whole.

Uncollectible expense is assumed to be a non cash expense and has been removed from the Cash Working Capital calculations. See WPB-8, lines 2 and 19.

- c. See the attachment labeled as AG 7.02_Attach1.
- d. Zero percent, see the response to part a above.
- e. See ComEd's response to subpart (b), above.

Commonwealth Edison Company
Subaccount 144000
Accumulated Provisions for Uncollectible Accounts
(In Dollars)

<u>Month</u>	<u>Ending Balance Per Trial Balance - Bad Debt Provision</u>	<u>Ending Bal Per Trial Balance - Project LPCRES</u>	<u>Ending Balance Per Trial Balance (Total 144000)</u>
December 2009	\$ (65,000,482)	(7,487,880)	\$ (72,488,363)
January 2010	(76,938,054)	(7,318,722)	(84,256,775)
February 2010	(77,529,874)	(7,396,381)	(84,926,254)
March 2010	(83,160,754)	(8,979,651)	(92,140,406)
April 2010	(75,421,185)	(9,040,509)	(84,461,695)
May 2010	(72,342,842)	(9,224,138)	(81,566,980)
June 2010	(69,382,179)	(9,051,148)	(78,433,326)
July 2010	(84,305,974)	(9,338,656)	(93,644,630)
August 2010	(91,167,630)	(9,361,914)	(100,529,544)
September 2010	(85,037,804)	(9,437,846)	(94,475,650)
October 2010	(69,734,103)	(9,333,727)	(79,067,831)
November 2010	(58,986,819)	(8,809,845)	(67,796,664)
December 2010	(66,015,588)	(9,084,061)	(75,099,649)

**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: January 13, 2012

REQUEST NO. AG 4.25:

Explain the procedures employed by ComEd to determine monthly accruals to the provision for uncollectibles (bad debts) related to electricity sales. If these procedures during 2010 involved any analysis of aged accounts receivables, provide complete copies of the reports, calculations, analyses, workpapers and other information relied upon to determine the recorded uncollectibles provisions.

CORRECTED RESPONSE:

Uncollectible expense is calculated as follows:

Each month the required bad debt reserve is calculated based on management's estimate of the collectability of the accounts receivable portfolio. This analysis is using the results of a quarterly study performed by KPMG utilizing a risk factor analysis of accounts receivable, based on four risk segments to determine the appropriate reserve percentages for uncollectible accounts. Risk segments are determined by evaluating a customer's payment history and collection activity on their account in order to determine the level of risk of ultimately defaulting on a payment. The length of time they have been a customer is also a factor in determining risk segmentation. The higher the estimated collectibility, the lower the risk factor. Additionally, separate risk factors are established for residential (RES) and small commercial and industrial (SC&I) customers. Within each group, there is one risk factor percentage for each risk segment. These risk factors are then multiplied against the month end accounts receivable to calculate the indicated reserve. The indicated reserve is then reduced for deposits on customer accounts, revenues subject to refund and for estimated cash recoveries of previously written off accounts. Cash recoveries are estimated to be 10% of written off accounts based on ComEd's history of collections. The indicated reserve is increased for other customers, such as large commercial and industrial (LC&I), customers in bankruptcies and any other customers that require a specifically identified special reserve. ComEd specifically determines which customers pose credit risks and determine what percentage to accrue. Finally, ComEd makes an adjustment to the reserve to reduce its utility tax liability by 8% to reflect the portion of its total receivables which will not be collected and therefore will not be required to be remitted to the appropriate taxing authority. The net amount of the indicated reserve is then compared to the amount reserved in the previous month, less actual charge-offs in the current month. The difference represents the amount necessary to reflect the net indicated reserve at the end of the month, which is recorded as the total uncollectible accounts expense in Account 904.

See detailed monthly calculation in the attachments labeled as AG 4.25 CORRECTED_Attach 01A through AG 4.25 CORRECTED_Attach 12A. See corresponding work papers that support those calculations in the attachments labeled as AG 4.25 CORRECTED_Attach 01B through AG 4.25 CORRECTED_Attach 12B. All attachments have been redacted for customer specific information.

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 7.06:****Ref: Response to DGK 1.12, Attachment 1 (Residential Customer Bill Samples).**

The referenced random sample of 50 residential customers' bills appear to reflect no significant delinquencies for any customer other than activity related to normal budget billing balances. Please provide the following additional information:

- a. Confirm that the customer bills provided represent a random sample from the entire population of Residential customers' billings occurring in 2010, or explain any inability to confirm.
- b. Explain how the overall population of Residential customers can produce the 32.36678 day average collection lag day value shown in the Company's Lead Lag Study workpapers (AG 1.26, Attachment 1 at CFRC 0000404) when this sample of 50 residential customers' bills reveals no pattern of delinquencies or prior months' unpaid balances that would be consistent with such an extended collection lag period.
- c. Provide copies of all studies, reports, analyses and other documents associated with or supportive of your response to part (b).

RESPONSE:

- a. Yes, the sample was randomly selected.
- b. While this small number of bills (2 bills from 50 customers, out of a population of approximately 3.4 million residential customers, most of which would have 12 bills per year) does not show a significant pattern of past due amounts, the data and assumptions used to calculate the collection lag does reflect this pattern and results in a collection lag of 32+ days. ComEd notes that the random sample of 100 bills was selected in response to the Staff data request, and ComEd has not analyzed whether the sample size is a statistically valid sample size that would be expected to be representative of the entire population of customer bills. The data used indicates that ComEd has many customers and accounts receivable balances past due with some up to 365 days old. Also, ComEd has not included additional accounts receivable balances over 365 days old that would, if included, result in a longer collection lag.
- c. See ComEd Ex. 8.2 for the data used to calculate the collection lag.

ICC Docket No. 11-0721**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests****AG 1.01 – 1.30****Date Received: November 16, 2011****Date Served: November 30, 2011****REQUEST NO. AG 1.27:****Ref: ComEd Ex. 8.1 and 8.1TB, line 9 (Pension/OPEB Zero Payment Lead).**

Please provide complete copies of all analyses, workpapers, projections, correspondence and other documents supportive of the zero payment lead days attributed to Pension and OPEB employee benefits. In addition, please explain whether ComEd ever pays any cash for these benefits and, if so, whether any measurement of the timing of such cash flows was determined to be appropriate or necessary. Provide copies of all documents associated with your response.

RESPONSE:

ComEd routinely and periodically makes payments to the trusts associated with these benefits. The revenue requirement schedules in this proceeding separately account for the net pension asset, which is the net amount of the cumulative non-cash pension accruals and the cash contributions, as well as the OPEB liability, which similarly represents the net amount of the non-cash accruals and the cash contributions. In the case of pension – the cash contributions have been greater than the pension accruals, and there is a proposal in this proceeding to earn an investment return on the net Pension asset (*see* Direct Testimony of Kathryn Houtsma, ComEd Ex. 2.0 at 19). With respect to OPEB, the non-cash accruals have exceeded the cash contributions, hence the net OPEB liability reduces rate base. Since these amounts are already included in rate base or earning a return, consistent with the last rate order, zero lag days are used. No separate measurement of the timing of the cash flows was done and no other analyses, workpapers, projections or correspondence exist supportive of the zero lead days. In ComEd's last rate case (ICC Docket No. 10-0467, Final Order at Appendix A, Page 17, column (c), line 8), the Commission approved zero lead days for the Pension and OPEB amounts.

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

PR 1.01 – 1.04

Date Received: December 5, 2011

Date Served: December 19, 2011

REQUEST NO. PR 1.02:

Please answer the following concerning the statement on p.10 of ComEd Ex. 2.0 that the current ECOSS contains a change in the manner of functionalizing G&I from a direct assignment methodology to a generic W&S allocation:

- a) Please explain whether this change has any impact on the overall distribution revenue requirement.
- b) In Docket No. 10-0467, in response to Staff DR PL 6.06, the Company stated that "The alignment of functionalization methodologies with the Transmission Formula Rate increases the revenue requirement by \$1,970K." Likewise, if the answer to part a) is yes, please indicate what the change to the Company's proposed distribution revenue requirement would be if the previously used direct assignment methodology was retained in this case.
- c) Please explain whether the Company considers a generic W&S allocation to produce more accurate results from a cost standpoint than a direct assignment approach.
- d) Please explain in detail why it is appropriate from a cost standpoint to directly assign.
- e) For each G&I account please indicate whether the allocation at the function level is the same as the allocator at the sub-function level.
- f) For each account identified in response to part e of this question where the allocators at the function and sub-function levels are different, please identify and explain each of the reasons why two different allocators were chosen and please explain why the use of two different approaches is consistent with costs.

RESPONSE:

ComEd objects to the question as it mischaracterizes the testimony in ComEd Ex. 2.0 at 10. ComEd Ex. 2.0 does not address the ECOSS, nor does the testimony state that a change was made from direct assignment to a generic W&S allocation. Subject to that objection and ComEd's General Objections, ComEd responds as follows: As described in the direct testimony of Kathryn Houtsma, ComEd Ex. 2.0 at 29, ComEd had previously applied a direct assignment approach to only a portion of G&I Plant (Account 397 – Communications Equipment) and applied several different allocation methods to functionalize the remaining G&I plant between transmission and distribution, but in this proceeding, ComEd is proposing to change to use a single allocation method for G&I plant (apart from Account 397) based on wages and salaries. A direct assignment approach continues to be proposed for Account 397. The rationale for the change is described by Ms. Houtsma on the page referenced above.

- a) ComEd has not performed an update of the allocation methods used in previous cases, but based on the factors utilized in 2010 the changes do have an impact on the revenue requirement as discussed in ComEd's response to subpart (b), below.

- b) If the previously allowed allocation factors for Account 389, Account 390, Account 392, and Accounts 394 - 396 were used in the formula rate template, the net change to the revenue requirement would be \$2,547,000. Jurisdictional rate base would decrease by net amount of \$18,197,000 reducing the revenue requirement by \$2,055,000. Jurisdictional depreciation expense would be reduced by \$492,000.
- c) When it can be accurately applied to a specific cost, direct assignment can produce a more accurate assignment of costs. For most types of general cost accounts, such as general and intangible plant as well as administrative and general expenses, direct assignment is not usually feasible due to the nature of the underlying costs which are shared between different functions. For example, Direct Assignment is feasible for Account 397, Communications Equipment, because the assets in that account can be associated to a particular function based on the location of the equipment and the function of the underlying asset. Direct Assignment is not feasible for many of the other types of general plant. For example, Account 394, Tools, Shop and Garage Equipment is commonly used by employees who serve both transmission and distribution functions and cannot be readily associated with a discrete function. Therefore, the use of a general allocator is appropriate. The change in this proceeding with respect to this account was a change from a general allocator based on gross plant to a general allocator based on wages and salaries. Also, ComEd believes it is appropriate to functionalize the assets consistently for transmission and distribution rate purposes to ensure that there are no overlaps or gaps in cost recovery.
- d) See ComEd's response to subpart (c), above.
- e) ECOSS allocates the G&I (general and intangible plant) accounts (at the 3-digit level) from the function to the subfunction levels as follows. The W&S components of the O&M accounts related to distribution plant (accounts 580 through 598) are allocated to subfunctions based on the assignment/allocation of corresponding plant investment amounts. See lines 286 through 308 of Schedule 1b, Functionalization Factors, of Exhibits 10.1 & 10.1 TB. For example, the W&S component of Account 593 (Maintenance of Overhead Lines) is allocated to the subfunctions: High Voltage Dist. Lines, Dist. Lines Primary, and Dist. Lines Secondary, based on the plant investment in the subfunctions, at line 301 of Schedule 1b. The allocator "LTOTAL DIST." is formed from these distribution plant-related W&S allocators at lines 216 through 218 of this schedule. The "L-TOTAL DIST." allocator is then used to subfunctionalize the distribution-related portion of the G&I accounts, lines 323 through 442 of Schedule 1b. This process is necessary because there is no direct mapping available from the accounting system of the W&S component of distribution-related expenses to the specific distribution plant subfunctions used in the ECOSS.

The W&S components of the customer service-related O&M accounts are directly mapped from expense accounts 901 through 916 to the customer-related sub-functions. See lines 311-319 of Schedule 1b. These W&S values are used to form the allocator "LDIST (901-916)" at lines 224 through 226 of this schedule. This allocator is used to subfunctionalize the customer-related component of each G&I account, lines 323 through 442, of Schedule 1b.

- f) In general (with the exception of Account 397), the W&S allocator is used throughout to functionalize G&I accounts in ECOSS. As noted above, the W&S components of the 3-digit distribution-related expenses are subfunctionalized on plant, because there is no corresponding accounting data to do otherwise. There is an internal consistency in this process, because the subfunctionalization of the direct O&M expenses at the (3) three digit account level also uses plant investment as an allocator, since there is no direct mapping in the accounting system of O&M expenses to the subfunctions.

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
PR 1.01 – 1.04**

Date Received: December 5, 2011

Date Served: December 21, 2011

REQUEST NO. PR 1.02:

Please answer the following concerning the statement on p.10 of ComEd Ex. 2.0 that the current ECOSS contains a change in the manner of functionalizing G&I from a direct assignment methodology to a generic W&S allocation:

- a) Please explain whether this change has any impact on the overall distribution revenue requirement.
- b) In Docket No. 10-0467, in response to Staff DR PL 6.06, the Company stated that "The alignment of functionalization methodologies with the Transmission Formula Rate increases the revenue requirement by \$1,970K." Likewise, if the answer to part a) is yes, please indicate what the change to the Company's proposed distribution revenue requirement would be if the previously used direct assignment methodology was retained in this case.
- c) Please explain whether the Company considers a generic W&S allocation to produce more accurate results from a cost standpoint than a direct assignment approach.
- d) Please explain in detail why it is appropriate from a cost standpoint to directly assign.
- e) For each G&I account please indicate whether the allocation at the function level is the same as the allocator at the sub-function level.
- f) For each account identified in response to part e of this question where the allocators at the function and sub-function levels are different, please identify and explain each of the reasons why two different allocators were chosen and please explain why the use of two different approaches is consistent with costs.

SUPPLEMENTAL RESPONSE TO SUBPART (b) ONLY:

Pursuant to discussion with Staff, ComEd is supplementing its response to subpart (b) to include PR 1.02 Supp_Attach 1.

- b) If the previously allowed allocation factors for Account 389, Account 390, Account 392, and Accounts 394 - 396 were used in the formula rate template, the net change to the revenue requirement would be \$2,547,000. Jurisdictional rate base would decrease by net amount of \$18,197,000 reducing the revenue requirement by \$2,055,000. Jurisdictional depreciation expense would be reduced by \$492,000. The calculations are detailed on the attachment labeled as PR 1.02 SUPP_Attach 1.

Summary

(in thousands)

	<u>Rate Base Impact</u>	<u>Revenue Requirement Impact</u>
<u>Plant in Service</u>		
Schedule B-1, page 2, column D, line 3	\$ (20,274)	\$ (2,291)
<u>Accumulated Reserve</u>		
Schedule B-1, page 2, column D, line 7	\$ 2,077	\$ 236
Totals	<u>\$ (18,197)</u>	<u>\$ (2,055)</u>

Depreciation Expense

Depreciation Expense	<u>\$ (492)</u>
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RATE BASE REVENUE REQUIREMENT IMPACT				
				Page 2
		Total	Plant in Service	Accum Reserve
Common Equity				
Book Value of Common Equity (\$ in 000s)	ILCC Fm 21 Pg 4 Col D Ln 15	\$6,909,266	\$6,909,266	\$6,909,266
Goodwill (\$ in 000s)	FERC Fm 1 \SEC 10K	2,625,000	2,625,000	2,625,000
Adjusted Common Equity Balance (\$ in 000s)	(Ln 1) - (Ln 2)	\$4,284,266	\$4,284,266	\$4,284,266
Long-Term Debt Balance (\$ in 000s)				
Long-Term Debt Balance (\$ in 000s)	(App 13 Ln 42) / 1,000	\$5,070,469	\$5,070,469	\$5,070,469
Short-Term Debt Balance (\$ in 000s)	App 12 Ln 4	\$ 53,606	\$ 53,606	\$ 53,606
Total Capital (\$ in 000s)				
Total Capital (\$ in 000s)	(Ln 3) + (Ln 4) + (Ln 5)	\$9,408,341	\$9,408,341	\$9,408,341
Equity as a Percentage of Total Capital (%)	(Ln 3) / (Ln 6)	45.54%	45.54%	45.54%
Long-Term Debt as a Percentage of Total Capital (%)	(Ln 4) / (Ln 6)	53.89%	53.89%	53.89%
Short-Term Debt as a Percentage of Total Capital (%)	(Ln 5) / (Ln 6)	0.57%	0.57%	0.57%
Cost of Capital				
Cost of Common Equity				
Avg Monthly Market Yield on 30 Yr US Treasury Securities (%)	Sch FR D-2 Ln 13	4.25%	4.25%	4.25%
Performance Metrics Penalty (%)	(1)	0.00%	0.00%	0.00%
Cost of Equity Base (%)	(2)	6.00%	6.00%	6.00%
Total Cost of Common Equity (%)	(Ln 10) + (Ln 11) + (Ln 12)	10.25%	10.25%	10.25%
Cost of Long-Term Debt (%)				
Cost of Long-Term Debt (%)	App 13 Ln 43	6.37%	6.37%	6.37%
Cost of Short-Term Debt (%)				
Cost of Short-Term Debt (%)	App 12 Ln 3	1.43%	1.43%	1.43%
Wtd Cost of Short-Term and Long-Term Debt (%)	(Ln 8) * (Ln 14) + (Ln 9) * (Ln 15)	3.44%	3.44%	3.44%
Cost of Credit Facilities				
Total Cost of Credit Facilities (\$ in 000s)	App 12 Ln 7	9,337	9,337	9,337
Cost of Capital of Credit Facilities (%)	(Ln 17) / (Ln 6)	0.10%	0.10%	0.10%
Wtd Avg Cost of Capital				
Wtd Cost of Equity (%)	(Ln 7) * (Ln 13)	4.67%	4.67%	4.67%
Wtd Cost of Long-Term Debt (%)	(Ln 8) * (Ln 14)	3.43%	3.43%	3.43%
Wtd Cost of Short-Term Debt (%)	(Ln 9) * (Ln 15)	0.01%	0.01%	0.01%
Cost of Credit Facilities (%)	Ln 18	0.10%	0.10%	0.10%
Wtd Avg Cost of Capital (%)	Sum of (Ln 19) thru (Ln 22)	8.21%	8.21%	8.21%
Federal Tax Rate (%)				
Federal Tax Rate (%)	WP 21	35.000%	35.000%	35.000%
Illinois State Tax Rate (%)				
Illinois State Tax Rate (%)	WP 21	7.300%	7.300%	7.300%
Federal Tax Rate Less State Tax Deduction (%)	(Ln 1) * ((1.0) - (Ln 2))	32.445%	32.445%	32.445%
Income Tax Rate (%)	(Ln 2) + (Ln 3)	39.745%	39.745%	39.745%
Incremental Tax Gross Up Factor (%)	(Ln 4) / ((1.0) - (Ln 4))	65.961%	65.961%	65.961%
Rate Base Before Projected Plant Adjs				
Rate Base Before Projected Plant Adjs	Sch FR B-1 Ln 49	\$ (18,197)	\$ 20,274	\$ (2,077)
Wtd Cost of Short- and Long-Term Debt (%)	(Sch FR D-1 Ln 16) + (Sch FR D-1 Ln 18)	3.54%	3.54%	3.54%
Effective Income Tax Rate (%)	Ln 4	39.745%	39.745%	39.745%
Interest Synchronization Deduction	(Ln 15) * (Ln 16) * (Ln 17)	\$ (256)	\$ 285	\$ (29)
Rate Base Change				
Rate Base Change		18,197	(20,274)	2,077
Wtd Cost of Capital				
Wtd Cost of Capital		8.21%	8.21%	8.21%
Return				
Return		1,494	(1,664)	171
Less: Interest Sync Deduction		\$ (256)	\$ 285	\$ (29)
		1,238	(1,379)	142
Incremental Gross Up%		65.961%	65.961%	65.961%
Tax Gross Up				
Tax Gross Up		817	(910)	94
Total Return Less Int Sync Plus Gross Up				
Total Return Less Int Sync Plus Gross Up		2,055	(2,289)	236
Depreciation Change				
Depreciation Change		(492)		

RATE BASE CHANGE		AS Filed			Using OLD METHOD			Variance		
Account		Allocation Of Gross Plant			Allocation Of Accumulated Depreciation			Allocation Of Accumulated Depreciation		
		In Service	Reserve	Net	In Service	Reserve	Net	In Service	Reserve	Net
General Plant Land in Fee	389.0	7,701,211	-	7,701,211	7,121,160	-	7,121,160	580,051	-	580,051
General Plant Structures & Improvements	390.0	248,761,145	(39,638,544)	209,122,601	230,753,281	(37,249,716)	193,503,565	18,007,864	(2,388,828)	15,619,036
General Plant Office Furniture & Equipment	391.X	72,627,876	(35,289,527)	37,338,349	72,627,876	(35,289,527)	37,338,349	-	-	-
General Plant Transportation Equipment	392.0	185,803,069	(80,716,869)	105,086,200	190,967,736	(82,960,513)	108,007,223	(5,164,667)	2,243,644	(2,921,023)
General Plant Stores Equipment	393.0	3,700,332	(1,765,450)	1,934,882	3,700,332	(1,765,450)	1,934,882	-	-	-
General Plant Tools, Shop and Garage Equipment	394.0	123,217,770	(50,667,271)	72,550,499	111,174,966	(45,715,258)	65,459,708	12,042,804	(4,952,013)	7,090,791
General Plant Lab Equipment	395.0	5,776,191	(5,002,944)	773,247	5,211,650	(4,513,977)	697,673	564,541	(488,967)	75,574
General Plant Power Operated Equipment	396.0	4,325,893	(1,289,918)	3,035,975	3,903,098	(1,163,846)	2,739,252	422,795	(126,072)	296,723
General Plant Communications Equipment	397.0	325,360,564	(138,440,527)	186,920,037	325,360,564	(138,440,527)	186,920,037	-	-	-
General Plant Miscellaneous Equipment	398.0	2,686,801	(1,336,556)	1,350,245	2,686,801	(1,336,556)	1,350,245	-	-	-
Removal and Salvage Work In Progress										
Intangible Plant		371,715,438	(242,798,494)	128,916,944	377,895,121	(247,498,636)	130,396,485	(6,179,683)	4,700,142	(1,479,541)
Amortization of Lease Improvements						1,064,821	1,064,821	-	(1,064,821)	(1,064,821)
Overall Total		1,351,676,290	(596,946,100)	754,730,190	1,331,402,585	(594,869,185)	736,533,400	20,273,705	(2,076,915)	18,196,790

DEPRECIATION

Commonwealth Edison Company
2010 Jurisdictional Depreciation and Amortization Expense
 (In Thousands)

Witness: Fruehe

Line No.	Description	Distribution	General and Intangible Plant			Total Jurisdictional
			Depreciable - Other	Depreciable - Acct 397	Amortized	
	(A)	(B)	(C)	(D)	(D)	(E)
1	2010 Depreciation Expense	\$ 314,214	\$ 25,329	\$ 35,808	\$ -	
2	2010 Amortization Expense	-	-	-	42,727	
3	<u>Adjustments</u>					
4	Depreciation Expense Related To Asset Retirement Costs (3)	1,191	63	-	-	
5	Depreciation Expense Related To Supply Administration Costs	-	-	-	(698)	
6	Costs Excluded from Prior ICC Orders (Sch B-2.1)	(192)	-	-	-	
7	Rider EDA Depreciation (Sch. B-2.2) (4)	(49)	-	-	-	
8	PORCB	-	-	-	(219)	
9	Expense Related To AMI Pilot (Sch B-2.3, page 2, Line 4)	(1,285)	(351)	-	(3,558)	
10	Subtotal 2010 Depreciation Expense	\$ 313,879	\$ 25,041	\$ 35,808	\$ 38,252	
11	Jurisdictional Percentage	100.0%	85.60%	53.72%	90.30%	
12	Jurisdictional Depreciation and Amortization Expense	\$ 313,879	\$ 21,435	\$ 19,236	\$ 34,542	\$ 389,092
				As Filed in Formula		\$ 389,584
						\$ (492)

Commonwealth Edison Company - Adjusted
 Summary of General and Intangible Plant Allocated between DST and Non-DST Functions
As of December 31, 2010
 (In Dollars)

Line No.	Description (A)	General Plant (B)	General Amortized (C)	Intangible Plant (C)	Total General & Intangible Plant Allocated (D)
1	Gross Plant				
2	Non-DST	\$ 381,306,430	\$ 4,538,449	\$ 38,732,809	\$ 424,577,688
3	DST	927,948,003	25,559,461	377,895,121	1,331,402,585
4	Total Gross Plant	1,309,254,433	30,097,910	416,627,930	\$ 1,755,980,273
		<u>70.9%</u>	<u>90.3%</u>		
5	Accumulated Depreciation/Amortization				
6	Non-DST	\$ (147,838,022)	\$ (2,946,145)	\$ (25,958,727)	\$ (176,742,894)
7	DST	(330,071,703)	(17,298,846)	(247,498,636)	(594,869,185)
8	Total Accum. Depreciation/Amortization	(477,909,725)	(20,244,991)	(273,457,363)	(771,612,079)
9	Net Plant	\$ 831,344,708	\$ 9,852,919	\$ 143,170,567	\$ 984,368,194
		<u>Total General Plant (from Above)</u>	<u>Less: Communication Equip</u>	<u>General Plant Excl Acct 397</u>	<u>Percentage to Apply to General Plant Excl Acct 397 for Depreciation Expense</u>
	<u>General Plant % Acct 397</u>	927,948,003	(325,360,564)	602,587,439	
	DST Total	1,309,254,433	(605,660,023)	703,594,410	85.6%
	Total Gross Plant				

Commonwealth Edison Company
 Depreciable General Plant and
 Related Accumulated Depreciation
 Allocated to ComEd Functions
 2010 - Actual
 (In Dollars)

Line No.	ComEd Depreciable General Plant (A)	Account (B)	As of December 31, 2010			Allocation Basis (F)	Percentage Allocation to Function		
			Gross Plant (C)	Accumulated Depreciation (D)	Net Plant (E)		Transmission (G)	Distribution (H)	Customer (I)
1	General Plant Land in Fee	389.0	8,631,709	-	8,631,709	Property Usage	17.50%	69.30%	13.20%
2	General Plant Structures & Impr	390.0	248,719,782	(24,182,873)	224,536,909	Property Usage	17.50%	69.30%	13.20%
3	General Plant Office Furniture & Equip	391.X	81,403,134	(39,553,382)	41,849,752	Wages and Salaries	10.78%	50.50%	38.72%
4	General Plant Transportation Equipment	392.0	208,252,711	(90,469,479)	117,783,232	Transp. Asset Study	8.30%	83.00%	8.70%
5	General Plant Stores Equipment	393.0	4,147,424	(1,978,760)	2,168,664	Wages and Salaries	10.78%	50.50%	38.72%
6	General Plant Tools, Shop	394.0	138,105,548	(56,789,140)	81,316,408	T and D Gross Plant	19.50%	80.50%	0.00%
7	General Plant Lab Equipment	395.0	6,474,099	(5,607,424)	866,675	T and D Gross Plant	19.50%	80.50%	0.00%
8	General Plant Power Operated Equip	396.0	4,848,569	(1,445,772)	3,402,797	T and D Gross Plant	19.50%	80.50%	0.00%
9	General Plant Communications Equip	397.0	605,660,023	(257,707,607)	347,952,416	Location of Equipment	46.28%	53.72%	0.00%
10	General Plant Miscellaneous Equipment	398.0	3,011,434	(1,498,045)	1,513,389	Wages and Salaries	10.78%	50.50%	38.72%
11	General Plant Other Tangible Equipment	399.0	-	-	-	Wages and Salaries	10.78%	50.50%	38.72%
12	General Plant Asset Retirement	399.1	-	-	-	Excluded	0.00%	0.00%	0.00%
13	Removal and Salvage Work In Progress		-	1,322,759	1,322,759	T and D Gross Plant	19.50%	80.50%	0.00%
14	Total Depreciable General Plant		1,309,254,433	(477,909,724)	831,344,709				

Commonwealth Edison Company
 Depreciable General Plant and
 Related Accumulated Depreciation
 Allocated to ComEd Functions
2010 - Actual
 (In Dollars)

Line No.	ComEd Depreciable General Plant (A)	Account (B)	Allocation Of Gross Plant			Allocation Of Accumulated Depreciation		
			Transmission (C)	Distribution (D)	Customer (E)	Transmission (F)	Distribution (G)	Customer (H)
1	General Plant Land in Fee	389.0	1,510,549	5,981,774	1,139,386	-	-	-
2	General Plant Structures & Impr	390.0	43,525,962	172,362,809	32,831,011	(4,232,003)	(16,758,731)	(3,192,139)
3	General Plant Office Furniture & Equip	391.X	8,775,258	41,108,583	31,519,293	(4,263,855)	(19,974,458)	(15,315,069)
4	General Plant Transportation Equipment	392.0	17,284,975	172,849,750	18,117,986	(7,508,967)	(75,089,668)	(7,870,845)
5	General Plant Stores Equipment	393.0	447,092	2,094,449	1,605,883	(213,310)	(999,274)	(766,176)
6	General Plant Tools, Shop	394.0	26,930,582	111,174,966	-	(11,073,882)	(45,715,258)	-
7	General Plant Lab Equipment	395.0	1,262,449	5,211,650	-	(1,093,448)	(4,513,977)	-
8	General Plant Power Operated Equip	396.0	945,471	3,903,098	-	(281,925)	(1,163,846)	-
9	General Plant Communications Equip	397.0	280,299,459	325,360,564	-	(119,267,081)	(138,440,527)	-
10	General Plant Miscellaneous Equipment	398.0	324,633	1,520,774	1,166,027	(161,489)	(756,513)	(580,043)
11	General Plant Other Tangible Equipment	399.0	-	-	-	-	-	-
12	General Plant Asset Retirement	399.1	-	-	-	-	-	-
13	Removal and Salvage Work In Progress		-	-	-	257,938	1,064,821	-
14	Total Depreciable General Plant		381,306,430	841,568,417	86,379,586	(147,838,022)	(302,347,431)	(27,724,272)

Commonwealth Edison Company
Allocation of Plant and Accumulated Amortization
Related to Amortizable General Plant to
ComEd Functions
2010 - Actual
(In Dollars)

Line No.	ComEd Amortizable General Plant (A)	As of December 31, 2010			Percentage Allocation to Function		
		Gross Plant (B)	Accumulated Amortization (C)	Net Plant (D)	Transmission (E)	Distribution (F)	Customer (G)
1	Leasehold Improvements - Acct. 390:						
2	Two Lincoln Centre	\$ 5,590,368	\$ (2,756,866)	\$ 2,833,502	17.10%	61.60%	21.30%
3	Three Lincoln Centre	9,774,902	(5,147,686)	4,627,216	17.10%	61.60%	21.30%
4	Customer Care Center	4,314,871	(3,359,358)	955,513	0.00%	0.00%	100.00%
5	Belvidere	188,700	(145,420)	43,280	18.60%	81.40%	0.00%
6	Channahon	87,189	(62,034)	25,155	18.60%	81.40%	0.00%
7	Chicago Loop Tech	323,745	(98,622)	225,123	47.70%	52.30%	0.00%
8	Harvard	14,121	(14,121)	-	18.60%	81.40%	0.00%
9	Libertyville	3,992,945	(3,043,248)	949,697	17.20%	75.10%	7.70%
10	Melrose Park Training Bldg.	1,000,347	(995,442)	4,905	18.60%	81.40%	0.00%
11	One Financial Place	4,265,344	(4,106,879)	158,465	17.10%	61.60%	21.30%
12	Pontiac	222,451	(222,451)	-	18.60%	81.40%	0.00%
13	Sandwich	1,732	(1,732)	-	18.60%	81.40%	0.00%
14	Sterling	263,092	(263,092)	-	18.60%	81.40%	0.00%
15	Woodstock	58,101	(28,041)	30,060	16.80%	73.10%	10.10%
16	Total Amortizable General Plant	<u>\$ 30,097,908</u>	<u>\$ (20,244,992)</u>	<u>\$ 9,852,916</u>			

Commonwealth Edison Company
Allocation of Plant and Accumulated Amortization
Related to Amortizable General Plant to
ComEd Functions
2010 - Actual
(In Dollars)

Line No.	ComEd Amortizable General Plant (A)	Amortizable General Plant					
		Allocation of Gross Plant			Allocation of Accumulated Amortization		
		Transmission (B)	Distribution (C)	Customer (D)	Transmission (E)	Distribution (F)	Customer (G)
1	Leasehold Improvements - Acct. 390:						
2	Two Lincoln Centre	\$ 955,953	\$ 3,443,667	\$ 1,190,748	\$ (471,424)	\$ (1,698,229)	\$ (587,213)
3	Three Lincoln Centre	1,671,508	6,021,340	2,082,054	(880,254)	(3,170,975)	(1,096,457)
4	Customer Care Center	-	-	4,314,871	-	-	(3,359,358)
5	Belvidere	35,098	153,602	-	(27,048)	(118,372)	-
6	Channahon	16,217	70,972	-	(11,538)	(50,496)	-
7	Chicago Loop Tech	154,426	169,319	-	(47,043)	(51,579)	-
8	Harvard	2,627	11,494	-	(2,627)	(11,494)	-
9	Libertyville	686,787	2,998,702	307,457	(523,439)	(2,285,479)	(234,330)
10	Melrose Park Training Bldg.	186,065	814,282	-	(185,152)	(810,290)	-
11	One Financial Place	729,374	2,627,452	908,518	(702,276)	(2,529,837)	(874,765)
12	Pontiac	41,376	181,075	-	(41,376)	(181,075)	-
13	Sandwich	322	1,410	-	(322)	(1,410)	-
14	Sterling	48,935	214,157	-	(48,935)	(214,157)	-
15	Woodstock	9,761	42,473	5,868	(4,711)	(20,498)	(2,832)
16	Total Amortizable General Plant	\$ 4,538,449	\$ 16,749,945	\$ 8,809,516	\$ (2,946,145)	\$ (11,143,891)	\$ (6,154,955)

Commonwealth Edison Company
 Allocation of Intangible Plant and Limited Term Easements
2010 - Actual
 (In Dollars)

Line No.	ComEd Intangible Plant (A)	As of December 31, 2010			
		Account (B)	Gross Plant (C)	Accumulated Amortization (D)	Net Plant (E)
1	Intangible-Non-Depreciable	301.000	\$ 80,375	\$ -	\$ 80,375
2	Intangible - Software:				
3	CEGIS Design Tool	303.000	3,399,290	(2,513,972)	885,318
4	CIMS Software	303.000	145,060,697	(98,547,592)	46,513,104
5	Mobile Data Software	303.000	32,890,180	(15,175,257)	17,714,923
6	Passport Software	303.000	35,993,666	(35,993,666)	-
7	PowerPath Software	303.000	65,114,233	(65,114,233)	-
8	Powertools Software	303.000	36,178,587	(26,055,716)	10,122,871
9	Miscellaneous Software	303.000	97,910,905	(29,887,166)	68,023,738
10	Total ComEd Intangible Plant		<u>\$ 416,627,932</u>	<u>\$ (273,287,602)</u>	<u>\$ 143,340,329</u>
11	Limited Term Easements - Transmission	350.000	\$ 412,767	\$ (168,546)	\$ 244,220
12	Limited Term Easements - Distribution	360.000	\$ 24,286	\$ (1,215)	\$ 23,071
13	(amortization included in Account 111)				

Commonwealth Edison Company
 Allocation of Intangible Plant and Limited Term Easements
2010 - Actual
 (In Dollars)

Line No.	ComEd Intangible Plant (A)	Allocation Basis (B)	Percentage Allocation to Function		
			Transmission (C)	Distribution (D)	Customer (E)
1	Intangible-Non-Depreciable (Organization Costs)	Wages and Salaries	10.78%	50.50%	38.72%
2	Intangible - Software:				
3	CEGIS Design Tool	T & D Gross Plant	19.50%	80.50%	0.00%
4	CIMS Software	100% Customer	0.00%	0.00%	100.00%
5	Mobile Data Software	T & D Gross Plant	19.50%	80.50%	0.00%
6	Passport Software	T & D Gross Plant	19.50%	80.50%	0.00%
7	PowerPath Software	Wages and Salaries	10.78%	50.50%	38.72%
8	Powertools Software	T & D Gross Plant	19.50%	80.50%	0.00%
9	Miscellaneous Software	Wages and Salaries	10.78%	50.50%	38.72%
10	Limited Term Easements - Transmission	Transmission	100.00%	0.00%	0.00%
11	Limited Term Easements - Distribution	Distribution	0.00%	100.00%	0.00%
12	(amortization included in Account 111)				

Commonwealth Edison Company
 Allocation of Intangible Plant and Limited Term Easements
2010 - Actual
 (In Dollars)

Line No.	ComEd Intangible Plant (A)	Allocation of Gross Plant		
		Transmission (B)	Distribution (C)	Customer (D)
1	Intangible-Non-Depreciable	\$ 8,664	\$ 40,589	\$ 31,121
2	Intangible - Software:			
3	CEGIS Design Tool	662,862	2,736,428	-
4	CIMS Software	-	-	145,060,697
5	Mobile Data Software	6,413,585	26,476,595	-
6	Passport Software	7,018,765	28,974,901	-
7	PowerPath Software	7,019,314	32,882,687	25,212,231
8	Powertools Software	7,054,824	29,123,763	-
9	Miscellaneous Software	10,554,795	49,445,007	37,911,102
10	Total ComEd Intangible Plant	\$ 38,732,809	\$ 169,679,970	\$ 208,215,151
11	Limited Term Easements - Transmission	\$ 412,767	\$ -	\$ -
12	Limited Term Easements - Distribution	\$ -	\$ 24,286	\$ -
13	(amortization included in Account 111)			

Commonwealth Edison Company
Allocation of Intangible Plant and Limited Term Easements
Related To Intangible Plant
2010 - Actual
(In Dollars)

Line No.	ComEd Intangible Plant (A)	Allocation of Accumulated Amortization		
		Transmission (B)	Distribution (C)	Customer (D)
1	Intangible-Non-Depreciable	\$ -	\$ -	\$ -
2	Intangible - Software			
3	CEGIS Design Tool	(490,225)	(2,023,747)	-
4	CIMS Software	-	-	(98,547,592)
5	Mobile Data Software	(2,959,175)	(12,216,082)	-
6	Passport Software	(7,018,765)	(28,974,901)	-
7	PowerPath Software	(7,019,314)	(32,882,687)	(25,212,231)
8	Powertools Software	(5,080,865)	(20,974,851)	-
9	Miscellaneous Software	(3,221,837)	(15,093,019)	(11,572,311)
10	Total Intangible Plant Accumulated Amortization	<u>\$ (25,790,181)</u>	<u>\$ (112,165,287)</u>	<u>\$ (135,332,134)</u>
11	Limited Term Easements - Transmission	\$ (168,546)	\$ -	\$ -
12	Limited Term Easements - Distribution	\$ -	\$ (1,215)	\$ -
13	(amortization included in Account 111)			

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
Citizens Utility Board ("CUB") Data Requests
CUB 3.01 – 3.04**

Date Received: December 29, 2011

Date Served: January 12, 2012

REQUEST NO. CUB 3.01:

Property tax expense allocation. Refer to ComEd Testimony ComEd Ex 2.0 Page 30, Lines 615 to 618, and to the Company's response to CUB 2.07.

- a. ComEd confirmed that by using Net Plant Allocator, the Company property taxes for 2010 is \$19.323 million for total company and \$15.153 million for jurisdictional, using a 78.42% allocation factor based on net plant.
- b. Please show in detail the jurisdictional allocation that would result from applying the same methodology used in ComEd's rate case, Docket No. 10-0467, Schedule C-19, where ComEd showed Total Company real estate taxes of \$19.840 million and Jurisdictional real estate taxes of \$12.124 million, indicating a composite jurisdictional allocation of 61.11%.
- c. Please show the calculation in detail what the change to the Company's proposed property taxes for total company and jurisdictional would be if the previously used allocators were applied to the \$19.323 million of total Company property taxes for 2010. Include supporting workpapers.

RESPONSE:

- a. Yes. The amounts are correct.
- b. ComEd has not completed the study for 2010 nor have the allocators been updated. Assuming the same allocation of 61.11%, the real estate taxes assigned to delivery service would be \$11.81 million.

In millions
\$19.323
x 61.11%
\$11.808

- c. Using the same calculation of 2010 real estate taxes as shown in subpart (b), the difference in 2010 jurisdictional real estate taxes would be a decrease of \$3.34 million if the methodology used in ICC Docket No. 10-0467 had been used in ICC Docket No. 11-0721. Note that as described in ComEd's response to part b, the study has not been performed for 2010 nor have the allocators been updated.

In millions
\$15.153
\$11.808
\$3.345

ICC Docket No. 11-0721

**Commonwealth Edison Company's Response to
Citizens Utility Board ("CUB") Data Requests
CUB 3.01 – 3.04**

Date Received: December 29, 2011

Date Served: January 12, 2012

REQUEST NO. CUB 3.02:

Explain fully and in detail why the jurisdictional allocation of real estate taxes for the formula rate should not be required to be consistent with the allocation of real estate taxes in Com Ed's rate case, Docket 10-0467.

RESPONSE:

As described in the direct testimony of Kathryn Houtsma, ComEd Ex. 2.0 at 30: 615 - 618 this method is consistent with the method used in ComEd's transmission formula rate and results in full cost recovery. Applying two different allocation methodologies would result in either an under or over recovery of costs.

The real estate tax allocation method applied in Docket 10-0467 did not necessarily produce a more accurate jurisdictional allocation than what ComEd has proposed in this instant proceeding. In Docket 10-0467 the property taxes on Rights of Way and Substation property, which represented 72% of the 2009 real estate taxes, were allocated to Transmission and Delivery Service using an allocator based on a study of General Communication Equipment (Account 397) locations. The study resulted in an allocation of Communications Equipment of 44.6% to Transmission and 55.4% to Delivery service. This study was valid for the functional allocation of the costs of communication equipment. The overall Transmission and Distribution net plant allocator is a reasonable measure for allocating real estate taxes as it portrays the overall relationship between the overall investments made in transmission and distribution.

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: December 20, 2011

REQUEST NO. AG 4.05:

Ref: ComEd Ex. 4.1, App 10; ComEd Response to AG 1.06 (Late Payment Revenues attributed to Transmission Jurisdiction) According to Att 10, the Company has attributed \$2.6 million of FERC Acct 450 revenues to Transmission. Please provide the following additional information:

- a. Explain the rationale for attributing Late Payment Revenues to the transmission jurisdiction.
- b. Provide calculations supportive of the amount attributed to Transmission.
- c. Provide an itemization of each instance in 2010 where a ComEd transmission service customer has actually paid Late Payment Charges, indicating the amount of such charges by customer.
- d. Provide copies of (or citation to) each FERC rule, order and/or other authority relied upon by ComEd to attribute Late Payment charges to the transmission jurisdiction.

RESPONSE:

- a. A significant portion of ComEd's transmission revenues relate to the bundled service it provides under Rider PE, and ultimately retail customers. Since a proportional amount of the customers' bills relate to transmission, a proportional amount of the Late Payment Charges should be allocated to transmission. ComEd has consistently assigned a portion of its late payment charges to transmission (ICC Docket Nos. 05-0597, 07-0566 and 10-0467).
- b. See ComEd's Data Request Response to AG 1.03 and the attachment labeled as AG 1.03_Attach 1 (Attachment 11, Account 450 – Forfeited Discounts, page 1 of 1).
- c. ComEd does not have information relating to late payment charges paid by transmission services only customers and notes that transmission services are provided by PJM. However, the late payment fees being allocated relate to late payment fees assessed on retail customers and would not apply to customers only taking transmission service from PJM.
- d. ComEd has not relied on any specific FERC orders in determining the amount of late payment charges included in the transmission formula rate, but has relied in part on the methodology accepted by the ICC in the proceedings cited in subpart (a) above.