

ICC Docket No. 11-0409

**Commonwealth Edison Company's Response to
District Recovery, Inc. and Sherry Radwanski, Individually ("DISTRICT") Data Requests
DISTRICT 5.01 – 5.16
Date Received: February 6, 2012
Date Served: March 5, 2012**

REQUEST NO. DISTRICT 5.01:

Who prepared the responses to the data interrogatories directed to Christopher Hundt?

RESPONSE:

ComEd objects to this request. See ComEd's General Objections. Notwithstanding its objection, Mr. Christopher Hundt, in conjunction with counsel, prepared the responses to the data interrogatories referenced in this request.

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REQUEST NO. DISTRICT 5.02:

The response of Christopher Hundt to Request No. 4.01 states that his responsibilities include representing the department on various Customer Operations Projects. Please provide the specific name of the ComEd department that Christopher Hundt represents”?

RESPONSE:

The name of the department requested is the Revenue Management Department.

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REQUEST NO. DISTRICT 5.03:

Who prepared the responses to the data interrogatories directed to Olga Perez?

RESPONSE:

ComEd objects to this request. See ComEd's General Objections. Notwithstanding its objection, Ms. Olga Perez, in conjunction with counsel, prepared the responses to the data interrogatories referenced in this request.

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REQUEST NO. DISTRICT 5.04:

Who is the ComEd employee or employees with knowledge of review, change, approval of wording and content of ComEd disconnect notices?

RESPONSE:

No one specific employee reviews, changes, and/or approves the wording or content of ComEd's disconnection notices. The changes are a joint effort between ComEd's Revenue Management, Billing, Legal and Regulatory departments.

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REQUEST NO. DISTRICT 5.05:

Who is the ComEd employee or employees with knowledge of review, change, approval of wording and content of ComEd "collection letters"?

RESPONSE:

No one specific employee reviews, changes, and/or approves the wording or content of ComEd's collection letters. The changes are a joint effort between ComEd's Revenue Management, Billing, Legal and Regulatory departments.

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REQUEST NO. DISTRICT 5.06:

Who is the ComEd employee or employees with knowledge of review, change, approval of wording and content of ComEd notices of account delinquencies?

RESPONSE:

ComEd utilizes either the customer's monthly bill and or the disconnection notice to notify customers of account delinquencies. As such, please see ComEd's Data Request Response to DISTRICT 5.04 and DISTRICT 5.05.

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REQUEST NO. DISTRICT 5.07:

Who is the ComEd employee or employees with knowledge of review, change, approval of wording and content of ComEd termination of service notices?

RESPONSE:

ComEd utilizes the disconnection notice as its notice of service termination. Please see ComEd's Data Request Response to DISTRICT 5.05.

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REQUEST NO. DISTRICT 5.08:

The response to Perez Request No. 3.05 contains illegible copies of ComEd documents. This is the second request to provide legible copies.

RESPONSE:

See the attachment labeled as DISTRICT 5.08_Attach 1.

Select Customer Contact for DENNIS RADWANSKI

Contact Edit Actions Help

Contacted	Type
01/13/11	Address Updated for USPS Compliance
01/13/11	Field Notification Call
01/06/11	Request Account Activity Statement
01/06/11	Miscellaneous
01/05/11	Correspondence - Collections
01/05/11	Credit Issues
12/30/10	Proactive Customer Call
12/07/10	Field Notification Call
11/29/10	Correspondence - Collections
11/23/10	Proactive Customer Call
10/29/10	Field Notification Call
10/21/10	Correspondence - Collections
10/15/10	Proactive Customer Call
09/22/10	Field Notification Call
09/14/10	Correspondence - Collections

Comments:

OTD #4317907 CHANGED MAILING ADDRESS TO 7450 S ARCHER RD JUSTICE, IL 60458

First Name: dennis
 Last Name: radwanski
 Email: districtrebuild@aol.com
 Mailing Address: 7450 s archer rd
 Mailing Address2:
 Mailing Address3:
 Mailing City: justice
 Mailing State: IL
 Mailing ZIP: 60458-
 Comments:

Audience: Business
 Relationship: Owner
 Confirmation Number: UA70044417
 Start Date:
 End Date:
 Reason For Change: Current Mailing address is incorrect

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REQUEST NO. DISTRICT 5.09:

The response to Perez Request No. 3.10 contained an "Attach 1". Please respond and confirm whether this disconnection notice was used by ComEd for commercial, residential or both types of accounts.

RESPONSE:

ComEd sends disconnect notices to both residential and commercial customers. However, the disconnect notices are different based upon whether it is a residential or commercial account. The attachment labeled as DISTRICT 5.09_Attach 1 is an example of ComEd's Final Notice Prior to Disconnection for commercial customers.



www.comed.com

ICC DKT. NO.11-0409
DISTRICT 5.09_Attach 1

USEFUL TELEPHONE NUMBERS
Customer Service: 1-800-203-0684
Hearing/Speech Impaired: 1-800-572-5789 (TTY)

Final Notice Prior to Disconnection

Name:

Service Location:

REDACTED

Account Number:

Issue Date:

October 31, 2011

Charges Past Due

Total amount due immediately \$1,747.70

Disconnection
Notice

Your electric service will be shut off on or after November 10, 2011 because a \$1,747.70 utility bill is past due.

If you do not pay this bill and your service is shut off, in addition to paying all past due balances, you may also be required to pay a credit deposit.

ComEd reserves the right to verify any payment before restoring service. Service will not be restored until after payment verification is completed, which will take 5 business days for paper and electronic check payments.

For More
Information

To contact us regarding your account, call ComEd at 1-800-203-0684. If you are hearing or speech impaired and use a TDD or TTY, call 1-800-572-5789.

If a representative is unable to help, you may ask to talk to a supervisor. If a supervisor is unable to help, call the Consumer Services Division of the Illinois Commerce Commission at 1-800-524-0795. If you are hearing or speech impaired and use a TDD or TTY, call 1-800-858-9277.

Between November of this year and March of the upcoming year, ComEd will notify the township supervisor, local department of public health, or county sheriff regarding the termination of service. Such notifications will be made at least 24 hours prior to the termination of service.

ComEd understands that service disconnection can be a frustrating experience. In an increasing number of cases, threats have been made against ComEd workers while performing or attempting to perform their duties. Please be aware that such action is punishable as a felony under an Illinois law that protects utility workers who are performing their duties. Conviction carries a minimum sentence of two years with fines up to \$25,000.



30% total recycled fiber

Return only this portion with your check made payable to ComEd. Please write your account number on your check.



REDACTED

Account Number

REDACTED

Payment Amount

Amount due immediately: **\$1,747.70**



ComEd
PO Box 6111
Carol Stream IL 60197-8111

REDACTED

CCDR 000098

01/20/11

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REQUEST NO. DISTRICT 5.10:

Why are the electronic files for customer notices, sent to Regulus, retained for approx. 3-1/2 years (Resp. to Req. No. 3.11), while billing records for customers are only retained for approx. 2 years?

RESPONSE:

ComEd objects to this request as vague and ambiguous, not relevant to the subject matter of the Complaint and not reasonably likely to lead to the discovery of admissible evidence.

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REQUEST NO. DISTRICT 5.11:

Who was the ComEd employee with whom Complainant spoke with on Feb. 28, 2010 regarding address issues, and what was the substance of the call?

RESPONSE:

Sherry Radwanski called ComEd asking for which bills are delinquent, when the last bill was paid, and requested a duplicate bill. The customer service representative for ComEd explained the status of multiple accounts. Please see ComEd's previous Data Request Responses regarding this request.

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REQUEST NO. DISTRICT 5.12:

Did any ComEd employee speak with Complainant or any of Complainant's employees at the service address between Jan. 1 and Jan. 31, 2011? If so, please provide the name of the ComEd employee, the date and time of such conversation, type of conversation (in person or telephone), who initiated such contact, and a brief summary of what was discussed during such conversation.

RESPONSE:

All information regarding interactions between ComEd and the Plaintiff were supplied during discovery.

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REQUEST NO. DISTRICT 5.13:

Please provide a full, detailed definition and explanation for all acronyms referenced in ComEd's responses to date.

RESPONSE:

ComEd objects to this request as vague and ambiguous. Notwithstanding ComEd's objection, all definitions for acronyms have been supplied as they were used within discovery responses.

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REQUEST NO. DISTRICT 5.14:

If "no one at ComEd authorized" the mailing address change on Aug. 12, 2009, and ComEd gave "no notice of the change" from the service address to a Westmont, IL PO box (Responses to Request No. 3.05), explain in detail why the bill finally received by Complainant in Jan. 2011, and the circumstances surrounding same, does not qualify as a "make-up bill", within the meaning of IL Administrative Code, Title 83, Chap. 1, Subchap. b, Part 280, Section 280.100(d) Unbilled Service.

RESPONSE:

ComEd objects to this request on the grounds that it calls for a legal conclusion.

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REQUEST NO. DISTRICT 5.15:

If "no one at ComEd authorized" the mailing address change on Aug. 12, 2009, and ComEd gave "no notice of the change" from the service address to a Westmont, IL PO box (Responses to Request No. 3.05), explain in detail why the bill finally received by Complainant in Jan. 2011, and the circumstances surrounding same, does not qualify as a "utility billing error", within the meaning of IL Administrative Code, Title 83, Chap. 1, Subchap. b, Part 280, Section 280.100(d) Unbilled Service.

RESPONSE:

ComEd objects to this request on the grounds that it calls for a legal conclusion.

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REQUEST NO. DISTRICT 5.16:

If "no one at ComEd authorized" the mailing address change on Aug. 12, 2009, and ComEd gave "no notice of the change" from the service address to a Westmont, IL PO box (Responses to Request No. 3.05), explain in detail why ComEd refused to accept liquidation payments on the bill for a period of time at least as long as the period over which the excess amount accrued, in accordance with IL Administrative Code, Title 83, Chap. 1, Subchap. b, Part 280, Section 280.100(d) Unbilled Service.

RESPONSE:

ComEd objects to this request on the grounds that it calls for a legal conclusion.