

OFFICIAL FILE

ILLINOIS COMMERCE COMMISSION

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COMMISSION

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION MAY 21 11 A 10: 33

Richard Kraft	:	
-vs-	:	11-0165
Commonwealth Edison Company	:	
	:	
Complaint as to power outages	:	
in Highland Park, Illinois.	:	

CHIEF CLERK'S OFFICE

ANSWER TO COMPLAINT

Now comes the Respondent, Commonwealth Edison Company ("Respondent" or "ComEd"), by and through its attorney, Mark L. Goldstein, and files this Answer to the Amended Formal Complaint ("Complaint") of Richard Kraft ("Complainant").

1-5. Respondent admits the allegations of Paragraphs 1-5 of the Complaint.

6. Respondent neither admits nor denies the allegations of Paragraph 6 of the Complaint because the allegations are not within the specific knowledge of the Respondent. Respondent has no specific knowledge of any notification request by the Complainant that he be notified of service interruptions at the subject property and demands strict proof thereof.

7. Respondent admits there were service interruptions at the subject property in July 2010, but denies the other allegations of Paragraph 7 of the Complaint in accordance with the Affidavit of Rajaie A. Abu-Hashim, attached hereto and made a part hereof.

8. Respondent admits that the Complainant was not specifically notified of service interruptions at the property as set forth in Paragraph 6 of this Answer.

9. Respondent neither admits nor denies the allegations of Paragraph 9 of the Complaint and so demands strict proof thereof.

10. Respondent admits the allegations of Paragraph 10 of the Complaint.

10. Respondent admits the allegations of Paragraph 10 of the Complaint.

11-17 Respondent admits there appears to be damage to the basement of the subject property as a result of the July 23, 2010 storm and admits that Exhibits A-E are copies of invoices for the clean-up, replacement and remediation of the subject property.

18. Respondent only admits that it owes its customers adequate and reliable service and so denies that it could possibly provide uninterrupted service to customers as forth in Paragraph 18 of the Complaint.

19. Respondent denies the allegations of Paragraphs 19 of the Complaint.

20. Respondent denies the allegations of Paragraph 20 of the Complaint.

21. Respondent denies the allegations of Paragraph 21 of the Complaint.

22. Respondent denies the allegations of Paragraph 22 of the Complaint.

Wherefore, the Respondent, Commonwealth Edison Company requests that the Amended Formal Complaint filed by the Complainant, Richard Kraft, be denied.

Respectfully submitted,
Commonwealth Edison Company

By: 
Mark L. Goldstein, Its Attorney

Mark L. Goldstein
Attorney for Respondent
3019 Province Circle
Mundelein, IL 60060
(847) 949-1340

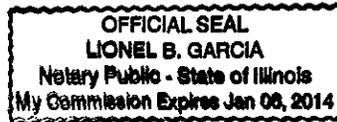
AFFIDAVIT

RAJAE A. ABU-HASHIM, being first duly sworn on oath, states that he is a Senior Engineer employed by Commonwealth Edison Company, that he has read the Answer to Paragraph 7 to the Amended Complaint and that he never informed the Complainant, Richard Kraft, about the electric supply to the subject property.


Rajae A. Abu-Hashim

Subscribed and Sworn to before me
this 15th day of May, 2012.


Notary Public



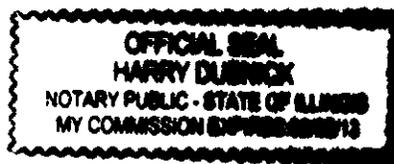
VERIFICATION

ERIN BUECHLER, being first duly sworn on oath, states that she is a Senior Regulatory Administrator in the Regulatory Department of Commonwealth Edison Company, that she has read the foregoing Answer to Complaint and that the statements set forth therein are true and correct.


Erin Buechler

Subscribed and Sworn to before me
this 16th day of May, 2012.


Notary Public



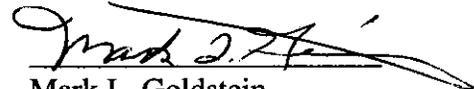
CERTIFICATE OF SERVICE

I do hereby certify that on May 17, 2012, I served the foregoing Answer to the Amended Formal Complaint by causing a copy thereof to be placed in the U. S. Mail, first class postage affixed, addressed to each of the parties indicated below:

Ms. Elizabeth A. Rolando
Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Richard Hillsberg
Kovitz Shifrin Nesbit
750 Lake Cook Rd., Ste. 350
Buffalo Grove, IL 60089

Ms. Bonita Benn
Administrative Law Judge
Illinois Commerce Commission
160 N. LaSalle St., Ste. C-800
Chicago, IL 60601


Mark L. Goldstein