

**AARP/AG Responses to  
Commonwealth Edison Company's Second Set of Data Requests  
[Principally Related to the Testimony of AARP/AG witness Dr. Megan Sandel]**

**ICC Docket No. 12-0298  
May 16, 2012**

ComEd → AA 2.01 Please refer to page 1, line 22 through page 2 line 41 of Dr. Sandel's narrative testimony wherein she responds to a request to summarize her qualifications and background. Does Dr. Sandel have any professional training:

- a. As an engineer;
- b. As an economist;
- c. As a physicist;
- d. In the development or design of rates and charges for a utility or other provider of tariffed services at regulated rates; or
- e. In the deployment of data communication networks or systems over broad geographical areas?

If Dr. Sandel's answer to any subpart hereof is anything other than an unqualified "no," please identify all such training by: (i) date, (ii) institution (or employer, if on the job training), and (iii) degree, certificate, program, or course.

**AARP/AG Response: No.**

**OFFICIAL FILE**

I.C.C. DOCKET NO. 12-0298  
AARP/AG Exhibit No. 20

Witness \_\_\_\_\_  
Date 5/23/12 Reporter TO

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ComEd →AA 2.02 Please refer to page 1, line 22 through page 2 line 41 of Dr. Sandel's narrative testimony wherein she responds to a request to summarize her qualifications and background. Does Dr. Sandel have any professional experience:

- a. As an engineer;
- b. As an economist;
- c. As a physicist;
- d. In the development or design of rates and charges for a utility or other provider of tariffed services at regulated rates; or
- e. In the deployment of data communication networks or systems over broad geographical areas?

If Dr. Sandel's answer to any subpart hereof is anything other than an unqualified "no," please identify all such experience by: (i) date, (ii) employer or other entity on for which such work was performed; and (iii) the nature of the work performed.

**AARP/AG Response: No.**

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ComEd → AA 2.03 Please refer to page 1, line 22 through page 2 line 41 of Dr. Sandel's narrative testimony wherein she responds to a request to summarize her qualifications and background. Has Dr. Sandel ever held herself out to be a qualified expert in:

- a. Engineering;
- b. Economics;
- c. Physics;
- d. The development or design of rates and charges for a utility or other provider of tariffed services at regulated rates; or
- e. The deployment of data communication networks or systems over broad geographical areas?

If Dr. Sandel's answer to any subpart hereof is anything other than an unqualified "no," please identify all circumstances where she has so held herself out, including by date and to whom she so described herself.

**AARP/AG Response: No.**

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ComEd →AA 2.04 Please refer to page 1, line 22 through page 2 line 41 of Dr. Sandel's narrative testimony wherein she responds to a request to summarize her qualifications and background. Has Dr. Sandel ever been qualified to testify before a court of other governmental adjudicative body as a qualified expert in:

- a. Engineering;
- b. Economics;
- c. Physics;
- d. The development or design of rates and charges for a utility or other provider of tariffed services at regulated rates; or
- e. The deployment of data communication networks or systems over broad geographical areas?

If Dr. Sandel's answer to any subpart hereof is anything other than an unqualified "no," please identify all such matters by date, tribunal, and case or matter caption, and please identify the entity on whose behalf she testified.

**AARP/AG Response: No.**

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- ComEd →AA 2.05 In connection with the preparation of her testimony, did Dr. Sandel:
- a. Read and consider any portion of the Illinois Public Utilities Act? If Dr. Sandel's answer is anything other than an unqualified "no," please identify by section each provision of the Illinois Public Utilities Act that Dr. Sandel read and considered in connection with her testimony.
  - b. Consider an understanding of any portion of the Illinois Public Utilities Act that she did not herself read? If Dr. Sandel's answer is anything other than an unqualified "no," please identify by section each provision of the Illinois Public Utilities Act that Dr. Sandel considered, but not did herself read, and for each such section state Dr. Sandel's understanding of the section and the basis of that understanding. Produce any documents that record or memorialize any documents any information or communication on which her understanding is based.

**AARP/AG Response: No. However, during the course of the ComEd AMI HIA, Dr. Sandel had discussions with counsel for the Citizens Utility Board about the Act and how it might impact the development of the HIA.**

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ComEd AA 2.06      Should the Illinois Commerce Commission consider the health and safety of ComEd employees? If Dr. Sandel's answer is anything other than an unqualified "yes," please state and explain each reason why not.

**AARP/AG Response:      AARP and the People of the State of Illinois object to the question as vague in scope and meaning and because it assumes facts not in evidence.**

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ComEd →AA 2.09 Does Dr. Sandel recommend a Health Impact Assessment of a given policy should include both positive and negative potential health impacts? If Dr. Sandel's answer is anything other than an unqualified "yes," please state and explain each reason why.

**AARP/AG Response: Yes.**

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ComEd AA 2.13 Does Dr. Sandel contend that any portion of the AMI Plan establishes or modifies the rules defining when, or under what circumstances, a ComEd customer is subject to disconnection for non-payment? If Dr. Sandel's answer is anything other than an unqualified "no," please identify any and all such portions of AMI Plan by page number and provision.

**AARP/AG Response:** It is unclear to Dr. Sandel exactly what customer notification practices are anticipated by the AMI Plan at a residential premise when a customer faces disconnection for non-payment, although the AMI Plan does anticipate activation of AMI's remote disconnection capability as referenced in ComEd Ex. 2.0 (Direct testimony of Richard O'Toole, pp. 54-55) and in the Black and Veatch cost/benefit analysis (ComEd Ex. 6.02, p. 4-7), which assumes that "field work capacity constraints will be reduced" without specifying what on premise notification procedures are currently in place and does not specify what on premise notification procedures would be used in conjunction with remote disconnect.

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ComEd AA 2.14 Does Dr. Sandel contend that any portion of the AMI Plan establishes or modifies the rules defining when, and under what circumstances, a ComEd customer subject to disconnection for non-payment must be given notice of impending disconnection? If Dr. Sandel's answer is anything other than an unqualified "no," please identify any and all such portions of AMI Plan by page number and provision.

**AARP/AG Response: See the response to ComEd AA 2.13.**