

Response to ComEd's
Fourteenth Set of Data Requests to Staff
Docket No. 11-0721 On Rehearing
Response of Staff Witness Ebrey

CE Reh
X Ex 4

ICC Person Responsible: Theresa Ebrey
Title: Accountant
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

ComEd → Staff 14.13 Is it Ms. Ebrey's opinion that customers derive a benefit in the form of lower pension expense resulting from pension contributions that ComEd is legally required to make under applicable pension laws?

- a. If Ms. Ebrey's answer is anything other than an unqualified "no", please fully explain the basis for the answer.
- b. If legally required pension contributions do result in lower pension expense, what is the basis upon which this witness would recommend against recovery for such contributions?

Response

The question appears to ask whether ratepayers benefit when ComEd obeys the law. Pension expense is the actuarially determined pension cost incurred by the Company for a given period based on the actuary's best assessment of various factors and assumptions at the time. Compliance with the law is a factor in the actuarial determination of pension expense; therefore, the Company's compliance with making the legally required contribution would not reduce pension expense. Non-compliance with the law, however, is an imprudent course of action.

OFFICIAL FILE

I.C.C. DOCKET NO. 11-0721
Theresa Ebrey ComEd X Exhibit No. 4
Witness Ebrey
Date 8/3/12 Reporter kw