

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY :
: No. 11-0692
Application for an amendment to a Certificate of :
Public Convenience and Necessity granted in ICC :
Docket Nos. 89-0215 and 92-0185, authorizing and :
directing the Petitioner to construct, operate and :
maintain two 345,000-volt underground electric :
transmission lines in Cook County, Illinois. :

COMMONWEALTH EDISON COMPANY'S EXHIBIT

Commonwealth Edison Company ("ComEd") hereby respectfully requests that the Administrative Law Judge enter into evidence the attached exhibit, ComEd Ex. 13.0. ComEd Ex. 13.0, is Staff's response to ComEd Data Request 3.01. Staff of the Illinois Commerce Commission and the City of Chicago do not object to the admission of ComEd Ex. 13.0 into the evidentiary record.

Dated: September 5, 2012

Respectfully submitted,
COMMONWEALTH EDISON COMPANY

By: /s/ John E. Rooney
One of its Attorneys

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Response to ComEd's
Second Set of Data Requests to Staff
Docket No. 11-0692
Response of Staff Witness Rashid

ICC Person Responsible: Yassir Rashid
Title: Electrical Engineer II, Safety & Reliability Division
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701
Date Received August 24, 2012
Date Served August 31, 2012

ComEd →Staff 3.01 After considering: 1) the Metra and ComEd affidavits filed on June 11, 2012, and admitted into evidence on August 15, 2012; 2) ComEd's Data Request Responses related to said affidavits, ENG 4.01-4.03 and ENG 5.01 -5.02; and 3) Mr. Rashid's July 31, 2012 walk down of the ComEd easement within the Metra property between Garfield Boulevard and 26th Street, Chicago - does Mr. Rashid agree that it is not possible for ComEd to construct and place in-service by June 1, 2014, an overhead 345kV transmission line from Garfield Boulevard to 26th Street using the existing ComEd easement from Metra, as identified in his rebuttal testimony, Staff Ex. 2.0? If the answer is something other than an unequivocal "yes", please explain all reasons why Mr. Rashid believes that ComEd can construct and live such facilities within the above time-frame.

Response:

At this time, Mr. Rashid offers no opinion on whether ComEd could construct an overhead 345kV as described above by June 14, 2014. Mr. Rashid's position of whether the line should be above-ground or underground is based on his interpretation of Section 8-406 of the Public Utilities Act.