

**ICC Docket No. 12-0298 (ON REHEARING)**

**Commonwealth Edison Company's Response to  
The People of the State of Illinois ("AG") Data Requests  
REHEARING AG 6.01 – 6.04  
Date Received: October 5, 2012  
Date Served: October 12, 2012**

**REQUEST NO. REHEARING AG 6.01:**

Referring to ComEd Exhibit 16.0, pages 2-3, please provide any studies or analyses prepared by or for the Company showing how the May 29 Formula Rate Order required a reduction to the budget available for AMI capital investment in 2012 from \$52.2 million to \$20 million.

**RESPONSE:**

The Final Order issued on May 29, 2012 in ICC Dkt. No. 11-0721 reduces ComEd's operating net revenues by almost \$100 million per year during the five (5) year long range plan ("LRP") period. For a presentation of the impact of the May 29 Formula Rate Order on ComEd's LRP, see the attachments labeled as REHEARING AG 6.01\_Attach 1, REHEARING AG 6.01\_Attach 2 (CONFIDENTIAL), and REHEARING AG 6.01\_Attach 3 (CONFIDENTIAL) which is ComEd's Data Request Response to REHEARING AG 11.02 in ICC Docket No. 11-0721 (ON REHEARING) and the attachments thereto labeled which were labeled as AG 11.02\_Attach 1 (CONFIDENTIAL) and AG 11.02\_Attach 2 (CONFIDENTIAL).

To the extent this data request seeks an individual analysis of "how the May 29 Formula Rate Order required a reduction" in short-term AMI capital expenditures, it does not accurately portray either how ComEd responds to a circumstance where revenues will not recover costs, nor the nature of capital investment prioritization. ComEd faces many investment demands and incurs many costs. ComEd plans its level of investment each year based upon its total forecasted revenues and earnings. ComEd has not prepared specific studies or analyses showing "how the May 29 Formula Rate Order required a reduction" to short-term AMI capital expenditures any more than it has prepared such a study regarding any other capital expenditure.

ComEd has considered the shortfall in revenues as well as the impacts on earnings in planning its comprehensive work plan and not just that work related to the AMI deployment. In this case, the Proposed AMI Plan meets all of the statutory goals while allowing for deployment of AMI in accordance with the Act.

**OFFICIAL FILE**

I.C.C. DOCKET NO. 12-0298

CUB Exhibit No. 3.0

Witness \_\_\_\_\_

Date 11-1-12 Reporter SB

ICC Docket No. 11-0721 (ON REHEARING)

Commonwealth Edison Company's Response to  
The People of the State of Illinois ("AG") Data Requests  
REHEARING AG 11.01 – 11.13

Date Received: July 9, 2012

Date Served: July 23, 2012

REQUEST NO. REHEARING AG 11.02:

Referring to ComEd Exhibit 31.0, page 5, please provide workpapers supporting the each of the revenue requirement amounts on lines 89 – 91.

RESPONSE:

Refer to lines 3 through 11 and line 16 of the attachment labeled as REHEARING AG 11.02\_Attach 1 (CONFIDENTIAL).

Lines 3 through 11 of the attachment labeled as REHEARING AG 11.02\_Attach 1 (CONFIDENTIAL) represent impacts from adjustments to working capital, operating reserves, incentive compensation, and other technical items. The impacts approximate the adjustments applied in the Final Order in ICC Docket No. 11-0721 (Appendix A) and are assumed constant through the projection period.

Line 16 ("Other Changes") represents all other net pre-tax impacts associated with the final rate order. Other Changes are computed as the difference between ComEd's Base Case Long Range Plan ("Base LRP") and a revised LRP incorporating all estimated rate order impacts ("Post Rate Order LRP"), excluding other discretely identified impacts. Other Changes can primarily be attributed to financial impacts associated with a resulting reduction in available equity capital.

Refer to the attachment labeled as REHEARING AG 11.02\_Attach 2 (CONFIDENTIAL) for projected summary income statements from our Base and Post Rate Order LRPs.