

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY

No. 11-0588

Petition to determine the applicability of Section
16-125(e) liability to events caused by the Summer
2011 storm systems

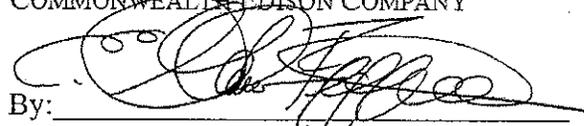
**COMMONWEALTH EDISON COMPANY'S REPLY
TO STAFF'S RESPONSE TO THE ALJ POST-RECORD DATA REQUEST**

Attached please find Commonwealth Edison Company's Reply to the Response of Staff of the Illinois Commerce Commission to the Administrative Law Judge's Post-Record Data Request in the above-captioned proceeding.

Dated: January 18, 2013

Respectfully submitted,

COMMONWEALTH EDISON COMPANY



By:

One of the attorneys for
Commonwealth Edison Company

Thomas S. O'Neill
Senior Vice President & General Counsel
COMMONWEALTH EDISON COMPANY
440 S. LaSalle Street, Suite 3300
Chicago, Illinois 60605
thomas.oneill@comed.com

Deborah Decker
10 South Dearborn Street
49th Floor
Chicago, Illinois 60603
deborah.decker@exeloncorp.com

E. Glenn Rippie
John E. Rooney
Carla Scarsella
Caitlin M. Shields
ROONEY RIPPIE & RATNASWAMY LLP
350 W. Hubbard Street, Suite 600
Chicago, Illinois 60654
(312) 447-2800
glenn.rippie@r3law.com
john.rooney@r3law.com
carla.scarsella@r3law.com
caitlin.shields@r3law.com

Counsel for Commonwealth Edison Company

OFFICIAL FILE

I.C.C. DOCKET NO. 11-0588

ALJ'S POST RECORD DATA REQUEST Exhibit No. 2

Witness _____

Date 1-25-13 Reporter _____

**Commonwealth Edison Company's Reply to
Staff's Response to the Administrative
Law Judge's Post Record Data Request
Date Served: January 18, 2013**

REQUEST:

Staff is directed to provide information or a spreadsheet identifying the specific outage ID for those 51,767 customers who Staff determined simultaneously experienced an interruption lasting 4 or more hours during the July 11 storm event, who were not covered by a waiver.

STAFF'S RESPONSE:

Customers that Staff determined should not be covered by a waiver are those affected by the 525 outage ID's shown in the attached file (11-0588 Post Record DR Response – Attach A.xls).

Staff utilized an Excel version of the information in Appendix D to its petition, provided by ComEd in response to Staff data request ENG 1.01, to determine the specific outage IDs not covered by a waiver.

Using data received from ComEd, Staff determined that more than 30,000 customers not covered by a waiver experienced an interruption lasting 4 or more hours during each four hour period ending from 12:10 p.m. on 7/11/11 until 1:45 a.m. on 7/12/11. 11-0588 Post Record DR Response – Attach A.xls lists the specific outage ID's associated with all of these customers.

The maximum number of customers who simultaneously experienced an interruption lasting 4 or more hours that was not covered by a waiver, 51,767, occurred during the four hour period ending 14:45 on July 11, 2011. The specific outage ID's associated with the interruptions for these 51,767 customers are listed in the attached file: 11-0588 Post Record DR Response – Attach B.xls.

COMED'S REPLY:¹

ComEd agrees that the 525 interruptions identified by Staff on Attach A.xls occurred within the time window specified. ComEd also agrees that the 354 interruptions identified on Attach B.xls, with respect to which Staff recommended against a waiver, affected a total of 51,767 customers during the period referenced. However, those spreadsheets inadvertently list a single interruption (ID #1515415) twice and, as a result, erroneously show a slightly greater number of customers. The following table, listing the interruptions on Attach B.xls by cause code, confirms that the total number of customers affected was 51,767.

INTERRUPTION CAUSE CATEGORY	INTERRUPTION CODE/DESC	# of Interruptions	Customers
TREE RELATED	TREE CONTACT - PRIMARY	172	25629
	LIMB BROKEN - PRIMARY	65	10308
	TREE CONTACT - SERVICE DROP	25	35
	LIMB BROKEN - SERVICE DROP	16	16
OVERHEAD EQUIPMENT RELATED	MALFUNCTION	13	5350
	BROKEN FUSE LINK	4	198
INTENTIONAL	EMERGENCY REPAIRS	14	4569
UNDERGROUND EQUIPMENT RELATED	UNDERGROUND FAILURE	7	2003
WEATHER RELATED	WIND / TORNADO	22	1541
UNKNOWN	UNKNOWN	6	1276
CUSTOMER	CUSTOMER EQUIPMENT	5	740
COMED/CONTRACTOR PERSONNEL ERRORS	SWITCHING ERROR	1	74
ANIMAL RELATED	SQUIRRELS	1	16
	ANIMAL - OTHER	2	5
PUBLIC	VEHICLES	1	13
Grand Total		354	51767

¹ ComEd contends that Section 16-125(e) is inapplicable to these interruptions and, in the alternative, that it is entitled to a waiver. ComEd does not waive any argument in support of those positions.