

ComEd Log of Privileged Information Redacted from Exhibits to Rebuttal Testimony of Anastasia M. Polek-O'Brien

Below is a log describing the nature of the tasks in the description entry redacted from ComEd billing invoices produced in response to Data Requests RWB 13.02 and 13.04 and included in the sample billing recaps provided in ComEd Ex. 15.06 on the grounds of attorney/client privilege and/or the work product doctrine. For ease of reference, the locations of the entries are identified by Bates number. The parenthetical at the end of each description contains the date the work was performed and the initials or code of the person who performed it. A key, listing the names of individuals referenced by their initials and/or billing code appears at the end of the log.

Invoice Number	Invoice Date	Firm Name	Docket Number	Description	Bates Number (2013CFRU ___)	Basis
ROONEY, RIPPKE & RATNASWAMY 2010 RATE CASE APPEAL INVOICES						
875	2/29/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (12/8/11- EGR)	0003346 (PUBLIC) 0003485 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel to client reflecting legal advice and research regarding relevant precedent and prepared in anticipation of litigation. (1/5/12-EGR)	0003351 (PUBLIC) 0003490 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel reflecting appellate case strategy and prepared in anticipation of litigation. (1/13/12-EGR)	0003351 (PUBLIC) 0003490 (C&P)	Work Product Production
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel regarding evidentiary analysis prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (1/19/12-EGR)	0003352 (PUBLIC) 0003491 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding record of case and prepared in anticipation of litigation. (1/20/12-EGR)	0003352 (PUBLIC) 0003491 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding record of case and prepared in anticipation of litigation. (1/22/12-EGR)	0003353 (PUBLIC) 0003492 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding argument and strategy and prepared in anticipation of litigation. (1/23/12-EGR)	0003353 (PUBLIC) 0003492 (C&P)	Attorney-Client Privilege/Work Product Doctrine
980	4/20/2012	R3	10-0467	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (1/26/12-EGR)	0003353 (PUBLIC) 0003492 (C&P)	Work Product Production
1600	12/11/2012	R3	10-0467	Confidential communication from outside counsel regarding <i>pro forma</i> issue and prepared for the purpose of facilitating the rendition of legal service and prepared in anticipation of litigation. (3/30/12-EGR)	0003363 (PUBLIC) 0003502 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1600	12/11/2012	R3	10-0467	Confidential communication from outside counsel regarding <i>pro forma</i> issue and prepared for the purpose of facilitating the rendition of legal service and prepared in anticipation of litigation. (3/30/12-CLF)	0003363 (PUBLIC) 0003502 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1601	12/12/2012	R3	10-0467	Confidential communication from outside counsel reflecting research regarding rate base and prepared in anticipation of litigation. (4/3/12-EGR)	0003365 (PUBLIC) 0003504 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1606	12/17/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding argument and strategy and prepared in anticipation of litigation. (11/7/12-EGR)	0003378 (PUBLIC) 0003517 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1606	12/17/2012	R3	10-0467	Confidential communication from outside counsel reflecting legal advice regarding argument and strategy and prepared in anticipation of litigation. (11/21/12-EGR)	0003378 (PUBLIC) 0003517 (C&P)	Attorney-Client Privilege/Work Product Doctrine
JENNER & BLOCK 2010 RATE CASE APPEAL INVOICES						
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel regarding filing requirements prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (2/1/12-0688)	0003390 (PUBLIC) 0003529 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel regarding filing requirements prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (2/3/12-0688)	0003390 (PUBLIC) 0003529 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel regarding filing requirements prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (2/6/12-0688)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel reflecting research regarding filing requirements and prepared in anticipation of litigation. (2/14/12-2338)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel regarding filing requirements prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (2/15/12-0688)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel regarding filing requirements prepared for the purpose of facilitating the rendition of legal services and prepared in anticipation of litigation. (2/15/12-0463)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (2/16/12-2338)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9225518	3/20/2012	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and strategy and prepared in anticipation of litigation. (2/16/2012-0688)	0003391 (PUBLIC) 0003530 (C&P)	Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding Commission opinion and legal strategy and prepared in anticipation of litigation. (3/21/12 - Demitrieva)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding impact of Commission action and legal strategy and prepared in anticipation of litigation. (3/29/12 - DeBruin)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional issue and legal strategy and prepared in anticipation of litigation. (8/27/12 - DeBruin)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional issue and legal strategy and prepared in anticipation of litigation. (11/7/12 - Levenstam)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional and statutory issue and legal strategy and prepared in anticipation of litigation. (11/7/12 - Demitrieva)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional issue and legal strategy and prepared in anticipation of litigation. (11/8/12 - Demitrieva)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional issue and legal strategy and prepared in anticipation of litigation. (11/9/12 - Levenstam)		Attorney-Client Privilege/Work Product Doctrine
N/A	N/A	Jenner	10-0467	Confidential communication from outside counsel reflecting legal advice regarding constitutional issue and legal strategy and prepared in anticipation of litigation. (11/21/12 - Levenstam)		Attorney-Client Privilege/Work Product Doctrine

Invoice Number	Invoice Date	Firm Name	Docket Number	Description	Bates Number (2013CFRU)	Basis
JENNER & BLOCK 2007 RATE CASE POST ORDER INVOICES						
9227956	4/30/2012	Jenner	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (3/23/12-0463)	0003284 (PUBLIC) 0003428 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9230297	5/15/2012	Jenner	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (4/26/12-0463)	0003289 (PUBLIC) 0003433 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9232622	6/29/2012	Jenner	07-0566	Confidential communication from outside counsel reflecting legal advice regarding opposing party argument and prepared in anticipation of litigation. (5/9/12-0463)	0003292 (PUBLIC) 0003436 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9232622	6/29/2012	Jenner	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (5/29/12-0463)	0003292 (PUBLIC) 0003436 (C&P)	Attorney-Client Privilege/Work Product Doctrine
9245740	10/19/2012	Jenner	07-0566	Confidential communication from outside counsel reflecting legal advice regarding briefing and prepared in anticipation of litigation. (7/30/12-0463)	0003300 (PUBLIC) 0003444 (C&P)	Attorney-Client Privilege/Work Product Doctrine
ROONEY, RIPPKE & RATNASWAMY 2007 RATE CASE POST ORDER INVOICES						
977	4/20/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (1/6/2012-EGR)	0003304 (PUBLIC) 0003448 (C&P)	Attorney-Client Privilege/Work Product Doctrine
977	4/20/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (1/10/2012-EGR)	0003305 (PUBLIC) 0003449 (C&P)	Attorney-Client Privilege/Work Product Doctrine
977	4/20/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding precedent and prepared in anticipation of litigation. (1/25/2012-EGR)	0003305 (PUBLIC) 0003449 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1151	6/25/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (2/23/12-EGR)	0003308 (PUBLIC) 0003452 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1151	6/25/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (2/23/12-CMS)	0003308 (PUBLIC) 0003452 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1151	6/25/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (2/24/12-CMS)	0003308 (PUBLIC) 0003452 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1151	6/25/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding filing requirements and prepared in anticipation of litigation. (2/24/12-EGR)	0003308 (PUBLIC) 0003452 (C&P)	Attorney-Client Privilege/Work Product Doctrine
1587	12/10/2012	R3	07-0566	Confidential communication from outside counsel reflecting legal advice regarding appellate case strategy and prepared in anticipation of litigation. (3/26/2012-EGR)	0003314 (PUBLIC) 0003458 (C&P)	Attorney-Client Privilege/Work Product Doctrine
EIMER STAHL 2011 RATE CASE BILL RECAP OF WORK NOT BILLED UNDER FIXED FEE						
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/03/12-MRJ)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting legal research regarding pension issue and prepared in anticipation of litigation. (8/13/12-VM)		Attorney-Client Privilege/Work Product Doctrine
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/14/12-VM)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/14/12-MRJ)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/14/12-FAF)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/15/12-MRJ)		Work Product Production

Invoice Number	Invoice Date	Firm Name	Docket Number	Description	Bates Number (2013CFRU ___)	Basis
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting legal research regarding jurisdictional issue and prepared in anticipation of litigation. (8/17/12-VM)		Attorney-Client Privilege/Work Product Doctrine
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/21/12-MRJ)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/22/12-MRJ)		Work Product Production
1010999	9/30/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (8/31/12-MRJ)		Work Product Production
1011039	10/12/2012	Eimer	11-0721	Confidential communication from outside counsel reflecting rate case strategy and prepared in anticipation of litigation. (9/30/12-MRJ)		Work Product Production

The above initials and codes correspond to following individuals:

Eimer Stahl

LLP:

AGC – Alexis Chardon, Attorney
DMS – David Stahl, Attorney
DMSi – David Simon, Attorney
GKL – Gina Lin, Attorney
JBS – James Speta, Attorney
JMW – Jonathan Wier, Attorney
MRJ – Mark Johnson, Attorney
RCB – Ronit Barrett, Attorney
SCS – Scott Solberg, Attorney
VM – Vanessa McClinton, Attorney
FAF – Fielden Fleming, Attorney
DJR – Daniel Rosenberg, Attorney
JMG – James McGovern, Legal Assistant
JML – Judy Lipinski, Legal Assistant

Rooney, Rippie & Ratnaswamy LLP:

EGR – E. Glenn Rippie, Attorney
CMS – Caitlin Shields, Attorney
CXS – Carla Scarsella, Attorney
SLR – Susan Rubner, Attorney
JPR – John Ratnaswamy, Attorney
CLF – Carmen Fosco, Attorney
JER – John Rooney, Attorney
BJD – Brian Dodd, Paralegal

Jenner & Block LLP:

2338 – Matthew Price, Attorney
0688 – Dave DeBruin, Attorney
0463 – Barry Levenstam, Attorney
9735 – Irina Dmitrieva, Attorney
1439 – Kathrine Fallow, Attorney