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**ILLINOIS COMMERCE COMMISSION** STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION

**ORIGINAL**  
ILLINOIS COMMERCE  
COMMISSION

2013 SEP 26 A 10:55

Kina Lovett :  
-vs- : 13-0130  
Commonwealth Edison Company :  
: :  
Complaint as to billing/charges in :  
Carol Stream, Illinois. :

CHIEF CLERK'S OFFICE

**RESPONDENT'S REPLY TO COMPLAINANT'S  
RESPONSE TO DENY RESPONDENT'S MOTION TO DISMISS**

Now comes the Respondent, Commonwealth Edison Company ("Respondent" or "ComEd"), by and through its attorney, Mark L. Goldstein, and files Respondent's Reply to Complainant's Motion to Deny Respondent's Motion to Dismiss ("Motion to Deny").

**Complainant's Contentions**

Kina Lovett ("Complainant") contends, in general that by ComEd crediting her account from July 2012 to July 2013, she would be entitled to have a zero balance on her account or a large credit. (Paragraphs 1 and 2 of Motion to Deny). Complainant further contends that since she is entitled to a credit from her "supplier" (Ambit Energy), she is entitled to a credit from ComEd. (Paragraph 4 of Motion to Deny).

**ComEd's Response**

In reply to Paragraphs 1 and 2 of the Motion to Deny, Complainant fails to understand ComEd's Motion to Dismiss and the billing of her account as set forth on Exhibit 1 of ComEd's Motion to Dismiss. In fact, through July 2013, as shown on Exhibit 1, Complainant's balance on her account with ComEd is zero. Complainant only owes \$90.57 due on her August 2013 electric bill. Moreover, there is no basis in

Complainant's Formal Complaint or any evidence presented at the evidentiary hearing in this matter upon which the Complainant would be entitled to a large credit from ComEd.

In reply to Paragraph 4 of the Motion to Deny, it is not relevant whether the Complainant is entitled to a credit from Ambit Energy. The fact remains that ComEd has fully credited Complainant's electric account for not only the period of July through December 2012, but also well beyond through July 2013. Complainant is not entitled to any more and could not receive any more from a Final Order of the Illinois Commerce Commission.

**Conclusion**

For the reasons set forth above, the Respondent, Commonwealth Edison Company respectfully again requests that the Formal Complaint filed by Kina Lovett be dismissed with prejudice.

Respectfully submitted,  
Commonwealth Edison Company

By:   
Mark L. Goldstein, Its Attorney

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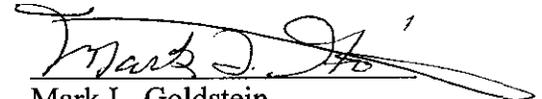
**CERTIFICATE OF SERVICE**

I do hereby certify that on September 24, 2013, I served the foregoing Respondent's Reply to Complainant's Motion to Deny Respondent's Motion to Dismiss by causing a copy thereof to be placed in the U. S. Mail, first class postage affixed, addressed to each of the parties indicated below:

Ms. Elizabeth A. Rolando  
Chief Clerk  
Illinois Commerce Commission  
527 East Capitol Avenue  
Springfield, IL 62701

Ms. Kina Lovett  
269 Flintridge Dr.  
Rockford, IL 61107

Mr. Terrance Hilliard  
Administrative Law Judge  
Illinois Commerce Commission  
160 N. LaSalle St., Ste. C-800  
Chicago, IL 60601

  
Mark L. Goldstein