

ICC Docket No. 13-0387

Commonwealth Edison Company's Response to
Coalition to Request Equitable Allocation of Costs Together ("REACT") Data Requests
REACT 3.01 - 3.16

Date Received: August 16, 2013

Date Served: August 30, 2013

REQUEST NO. REACT 3.02:

Please refer to REACT Ex. 3.0, the Direct Testimony of Jeffrey Merola, at 5:90-98, wherein Customer Care Costs are defined. Please provide any study and/or analysis conducted by ComEd, including all data and sources utilized, to analyze and/or derive what portion of Customer Care Costs are related to ComEd's supply function.

RESPONSE:

ComEd objects to this data request because the requested information is neither relevant to nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding and ComEd also objects to Mr. Merola's reference to "delivery and supply customers" because the costs related to the services Mr. Merola describes in REACT Ex. 3.0 at 5:90 - 98 are services that are provided to all of ComEd's delivery services customers regardless of the supply choice made by the customer. Subject to and without waiving this objection, or ComEd's General Objections, ComEd responds as follows:

Please see the Corrected Rebuttal Testimony of Christine M. Brinkman, ComEd Ex. 5.0 Corrected at 9:182 - 10:205 and the Rebuttal Testimony of Ronald E. Donovan, ComEd Ex. 9.0 at 9:178 - 17:362.

OFFICIAL FILE

I.C.C. DOCKET NO. 13-0387

REACT Exhibit No. 12

Witness Donovan

Date 9-25-13 Reporter KR

ICC Docket No. 13-0387

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REACT 3.01 – 3.16**

Date Received: August 16, 2013

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REQUEST NO. REACT 3.04:

Please refer to ComEd Ex. 3.01, ComEd's RDI ECOSS. Please provide any study and/or analysis conducted by ComEd, including all data and sources utilized, to analyze and/or derive what portion of the following ECOSS categories are related to ComEd's supply function:

- a. Billing – Computation and Data Management;
- b. Bill Issue and Processing; and
- c. Customer Service and Information.

RESPONSE:

ComEd objects to this request on the grounds that it is vague and ambiguous and is unreasonably burdensome as ComEd's electronic ECOSS model contains all of the formulas to functionalize and allocate costs in the aforementioned cost categories. Subject to and without waiving the foregoing objections, or ComEd's General Objections, ComEd responds as follows:

The above aforementioned cost categories in ComEd Ex. 3.01, the RDI ECOSS, do not contain supply related costs. Moreover, ComEd performed no study or analysis in connection with this proceeding to determine what portion of these costs might be considered supply related. Please see ComEd Ex. 3.0 at 11:214 – 12:219, the Direct Testimony of Bradley L. Bjerning, for a description of the only supply-related costs identified in ComEd's ECOSS.

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REQUEST NO. REACT 3.06:

Please refer to ComEd Ex. 3.01, ComEd's RDI ECOSS. For each ECOSS item listed below, please provide the following:

- a. All work papers, data and analysis used in deriving each RDI ECOSS item.
- b. The specific RDI ECOSS schedule 1a line number(s), column(s) and figure(s) that were used to generate and derive each RDI ECOSS item.
- c. The percentage of each RDI ECOSS item that ComEd has assigned to the delivery services function.
- d. The percentage of each RDI ECOSS item that ComEd has assigned to the supply function.

- (1) ComEd Ex 3.01, Schedule 2a, Line 14, Column "Total ICC"
- (2) ComEd Ex 3.01, Schedule 2a, Line 15, Column "Total ICC"
- (3) ComEd Ex 3.01, Schedule 2a, Line 16, Column "Total ICC"
- (4) ComEd Ex 3.01, Schedule 2a, Line 17, Column "Total ICC"
- (5) ComEd Ex 3.01, Schedule 2a, Line 35, Column "Total ICC"
- (6) ComEd Ex 3.01, Schedule 2a, Line 36, Column "Total ICC"
- (7) ComEd Ex 3.01, Schedule 2a, Line 37, Column "Total ICC"
- (8) ComEd Ex 3.01, Schedule 2a, Line 38, Column "Total ICC"
- (9) ComEd Ex 3.01, Schedule 2a, Line 56, Column "Total ICC"
- (10) ComEd Ex 3.01, Schedule 2a, Line 57, Column "Total ICC"
- (11) ComEd Ex 3.01, Schedule 2a, Line 58, Column "Total ICC"
- (12) ComEd Ex 3.01, Schedule 2a, Line 59, Column "Total ICC"
- (13) ComEd Ex 3.01, Schedule 2a, Line 77, Column "Total ICC"
- (14) ComEd Ex 3.01, Schedule 2a, Line 78, Column "Total ICC"
- (15) ComEd Ex 3.01, Schedule 2a, Line 79, Column "Total ICC"
- (16) ComEd Ex 3.01, Schedule 2a, Line 80, Column "Total ICC"
- (17) ComEd Ex 3.01, Schedule 2a, Line 98, Column "Total ICC"
- (18) ComEd Ex 3.01, Schedule 2a, Line 99, Column "Total ICC"
- (19) ComEd Ex 3.01, Schedule 2a, Line 100, Column "Total ICC"
- (20) ComEd Ex 3.01, Schedule 2a, Line 101, Column "Total ICC"
- (21) ComEd Ex 3.01, Schedule 2a, Line 125, Column "Total ICC"
- (22) ComEd Ex 3.01, Schedule 2a, Line 126, Column "Total ICC"
- (23) ComEd Ex 3.01, Schedule 2a, Line 127, Column "Total ICC"
- (24) ComEd Ex 3.01, Schedule 2a, Line 128, Column "Total ICC"
- (25) ComEd Ex 3.01, Schedule 2a, Line 146, Column "Total ICC"

- (26) ComEd Ex 3.01, Schedule 2a, Line 147, Column "Total ICC"
- (27) ComEd Ex 3.01, Schedule 2a, Line 148, Column "Total ICC"
- (28) ComEd Ex 3.01, Schedule 2a, Line 149, Column "Total ICC"
- (29) ComEd Ex 3.01, Schedule 2a, Line 167, Column "Total ICC"
- (30) ComEd Ex 3.01, Schedule 2a, Line 168, Column "Total ICC"
- (31) ComEd Ex 3.01, Schedule 2a, Line 169, Column "Total ICC"
- (32) ComEd Ex 3.01, Schedule 2a, Line 170, Column "Total ICC"
- (33) ComEd Ex 3.01, Schedule 2a, Line 189, Column "Total ICC"
- (34) ComEd Ex 3.01, Schedule 2a, Line 190, Column "Total ICC"
- (35) ComEd Ex 3.01, Schedule 2a, Line 191, Column "Total ICC"
- (36) ComEd Ex 3.01, Schedule 2a, Line 192, Column "Total ICC"
- (37) ComEd Ex 3.01, Schedule 2a, Line 227, Column "Total ICC"
- (38) ComEd Ex 3.01, Schedule 2a, Line 228, Column "Total ICC"
- (39) ComEd Ex 3.01, Schedule 2a, Line 229, Column "Total ICC"
- (40) ComEd Ex 3.01, Schedule 2a, Line 230, Column "Total ICC"

RESPONSE:

ComEd objects to this request on the grounds that it is vague and ambiguous as ComEd's ECOSS model provides all of the formulas that determines the results in the "Total ICC" column for all of the line numbers listed in this request. Subject to and without waiving the foregoing objection, or ComEd's General Objections, ComEd responds as follows:

- a. Please see ComEd's Data Request Response to REACT 3.03.
- b. Please see the formulas for each of the aforementioned cells in the Microsoft Excel version of ComEd Ex. 3.01 that was previously provided to REACT on a CD-ROM in early May, 2013.
- c. 100% of the costs are assigned as delivery services costs for all of the items listed above.
- d. 0% of the costs are assigned as supply costs for all of the items listed above.

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Commonwealth Edison Company's Response to
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REACT 4.01 – 4.17

Date Received: August 23, 2013

Date Served: September 6, 2013

REQUEST NO. REACT 4.16:

Referring to ComEd Ex. 9.0, the Rebuttal Testimony of Ronald E. Donovan, at 326-330, wherein Mr. Donovan discusses ComEd's Customer Contact Center (Call Center) "annual spend." Please answer the following:

- a) How much of the Customer Contact Center (Call Center) realized annual spend of \$25.8M was attributed to the ComEd supply function?
- b) How much of the Customer Contact Center (Call Center) realized annual spend of \$25.8M was attributed to the ComEd delivery services function?
- c) How much of the Call Center 2012 expense of \$36.6M was attributed to the ComEd supply function?
- d) How much of the Call Center 2012 expense of \$36.6M was attributed to the ComEd delivery services function?
- e) How much of the Call Center expense increase from \$25.8M to \$36.6M was attributed to the ComEd supply function?
- f) How much of the Call Center expense increase from \$25.8M to \$36.6M was attributed to the ComEd delivery services function?

RESPONSE:

ComEd objects to this request on the grounds that the requested information is neither relevant to nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding. ComEd also objects to this request on the grounds that the request is vague and ambiguous. ComEd further objects to Mr. Merola's reference to "delivery and supply customers" on the grounds that the costs related to the services Mr. Merola describes are services that are provided to all of ComEd's delivery services customers regardless of the supply choice made by the customer. Subject to and without waiving the foregoing objections, or ComEd's General Objections, ComEd responds as follows:

- a) None.
- b) \$25.8M
- c) None
- d) \$36.6M
- e) None
- f) None

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REACT 4.01 – 4.17

Date Received: August 23, 2013

Date Served: September 6, 2013

REQUEST NO. REACT 4.17:

Please refer to ComEd Ex. 9.0, the Rebuttal Testimony of Ronald E. Donovan, at 338-341, wherein Mr. Donovan discusses ComEd's Billing Department operating cost. Please answer the following:

- a) How much of the Billing Department operating cost of \$22.15M was attributed to the ComEd supply function?
- b) How much of the Billing Department operating cost of \$22.15M was attributed to the ComEd delivery services function?
- c) How much of the Billing Department expenses of \$26.15M was attributed to the ComEd supply function?
- d) How much of the Billing Department expenses of \$26.15M was attributed to the ComEd delivery services function?
- e) How much of the Billing Department expense increase from \$22.15M to \$26.15M was attributed to the ComEd supply function?
- f) How much of the Billing Department expense increase from \$22.15M to \$26.15M was attributed to the ComEd supply function?

RESPONSE:

ComEd objects to this request on the grounds that the requested information is neither relevant to nor reasonably calculated to lead to the discovery of admissible evidence in this proceeding. ComEd also objects to this request on the grounds that the request is vague and ambiguous. ComEd further objects to Mr. Merola's reference to "delivery and supply customers" on the grounds that the costs related to the services Mr. Merola describes are services that are provided to all of ComEd's delivery services customers regardless of the supply choice made by the customer. Subject to and without waiving the foregoing objections, or ComEd's General Objections, ComEd responds as follows:

- a) None
- b) \$22.15M
- c) None
- d) \$26.15M
- e) None
- f) None