

Response to ComEd's
Fifth Set of Data Requests to Staff
Docket No. 14-0312
Revised Response of Staff Witness Ebrey

ICC Person Responsible: Theresa Ebrey
Title: Accountant
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

ComEd→Staff 5.02.

On page 13 of Ms. Ebrey's direct, lines 271-274, Ms. Ebrey states the fact that ComEd keeps its books on the accrual basis rather than a cash basis and concludes that the amounts that are included in rate base are not reflective of the cash requirement that is measured by CWC. Please fully explain Ms. Ebrey's statement and indicate what information, analyses or documents Ms. Ebrey relied on in formulating that statement.

RESPONSE

Ms. Ebrey's statement on lines 271 – 274 was responsive to the Company's statement that periodic cash payments to the trusts for pension and OPEB costs are already accounted for as a 100% reduction to rate base in this proceeding. (Staff Ex. 1.0, p. 13, lines 269-271.)

Upon review of the Company's response to Staff data request TEE 16.01 and Attach 1, Ms. Ebrey understands that the payments/contributions for OPEB are reflected in rate base as a reduction at the 88.21% jurisdictional level.

However, the payment/contribution for funding the pension trust is not reflected in rate base but is rather a component of the pension asset that is only included as a component of the Pension Asset Funding Cost (as calculated on Schedule FR C-3) reflected on line 9 of Schedule FR A-1. This amount (pension asset funding cost) is excluded from the CWC calculation since it does not require a cash outlay by the Company.

Based on the information provided in response to Staff data request TEE 16.01 and Attach 1, Ms. Ebrey will be revising her CWC adjustment to only include a component for the jurisdictional Pension expense of \$98,005,000 rather than the combined Pension and OPEB amount of \$153,456,000 in her rebuttal testimony.

REVISED RESPONSE

Ms. Ebrey's statement on lines 271 – 274 was responsive to the Company's statement that periodic cash payments to the trusts for pension and OPEB costs are already accounted for as a 100% reduction to rate base in this proceeding. (Staff Ex. 1.0, p. 13, lines 269-271.)

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