

**Illinois Chamber of Commerce ("ILCC") Response to
The People of the State of Illinois ("AG") Data Requests**

ILCC 1.01 – 1.18

Date Received: August 19, 2014

Date Served: August 25, 2014

REQUEST NO. AG-ILCC 1.14:

Re: IL Chamber Ex. 1.0, lines 139-145. Mr. Maisch states that "the Illinois Chamber of Commerce would be open to discussing alternative methods for incorporating the 'limiter' feature in future AIPs, provided that any such method would serve a similar purpose to the current SPF limiter."

- (a) Hypothetically, in place of the Shareholder Protection Feature, would the IL Chamber support a "limiter" that reduced actual ComEd AIP incentive payments if Illinois' K-12 public school students did not meet specified performance targets on standardized tests?
- (b) Hypothetically, in place of the Shareholder Protection Feature, would the IL Chamber support a "limiter" that reduced actual ComEd AIP incentive payments if a horse won the first two races of the "Triple Crown" of United States three-year-old thoroughbred horse racing but then failed to win the third race?
- (c) In light of your responses to parts (a) and (b), why does the IL Chamber support a "limiter" that reduces actual ComEd AIP incentive payouts if the earnings per share of ComEd's parent company do not meet specified targets?

RESPONSE:

- (a) The Illinois Chamber of Commerce ("ILCC") objects to this request because it presents an incomplete hypothetical scenario and calls for speculation.
- (b) The ILCC objects to this request because it presents an incomplete hypothetical scenario and calls for speculation.
- (c) The ILCC takes no position as to whether ComEd should or should not include the Shareholder Protection Feature as a "limiter" to the ComEd AIP, but does take the position that the Shareholder Protection Feature should not act to preclude ComEd's recovery of AIP expense.

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I.C.C. DOCKET NO. 14-0312

AG Cross Exhibit No. 9

Witness _____

Date 8/27/14 Reporter CC