

ICC Docket No. 14-0312

Chicagoland Chamber of Commerce ("CCC") Response to  
The People of the State of Illinois ("AG") Data Requests  
CCC 1.01 – 1.11

Date Received: August 20, 2014  
Date Served: August 25, 2014

REQUEST NO. AG-CCC 1.06:

Re: CCC Ex. 1.0, lines 161-163. Mr. Carpenter states that "Mr. Brosch's proposal would have the odd result of deleting the limiter and thus passing along to customers the full amount of annual incentive compensation calculated under ComEd's AIP."

- (a) Does Mr. Carpenter know whether ComEd can revise its AIP to remove the Shareholder Protection Feature from its AIP?
- (b) Is it Mr. Carpenter's opinion that if the Commission hypothetically adopted Mr. Brosch's proposal, ComEd would respond by removing the Shareholder Protection Feature from its AIP?
- (c) Why would it be "odd" if the Shareholder Protection Feature were removed from ComEd's AIP and ComEd recovered the full amount of AIP expense each year?
- (d) Does Mr. Carpenter believe that if the Shareholder Protection Feature were not part of the ComEd AIP, ComEd would implement the same operational performance targets and related incentive bonus amounts under the AIP as currently exist?
- (e) Please reconcile (i) the above-cited quote from lines 161-163 of Mr. Carpenter's testimony with (ii) Mr. Carpenter's statement at line 156 that the AG proposal "would likely undo pay-at-risk compensation altogether."

RESPONSE:

- (a) No.
- (b) The Chicagoland Chamber of Commerce ("CCC") objects to this request because it calls for speculation. Subject to this objection, the CCC does not know how ComEd would respond if the Commission were to adopt Mr. Brosch's proposal, but Mr. Carpenter believes that ComEd could respond by removing the Shareholder Protection Feature.
- (c) The CCC describes the result as "odd" because adoption of the AG's position could result in the removal of the Shareholder Protection Feature and increasing rates for customers.
- (d) The CCC objects to this request because it calls for speculation. Subject to this objection, the CCC does not know what ComEd would do if the Shareholder Protection Feature were not part of the ComEd AIP.
- (e) No reconciliation is necessary. These are two potential alternative outcomes of the AG's proposal.

**OFFICIAL FILE**  
I.C.C. DOCKET NO. 14-0312  
AG Cross Exhibit No. 18  
Witness Carpenter  
Date 8/28/14 Reporter TO