

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY :
: No. 14-0312
Annual formula rate update and revenue :
requirement reconciliation under :
Section 16-108.5 of the Public Utilities Act :

MOTION OF COMMONWEALTH EDISON COMPANY

Commonwealth Edison Company (“ComEd”), by its attorneys, respectfully files this Motion with the Administrative Law Judges (“ALJs”), pursuant to Section 200.190 of the Rules of Practice of the Illinois Commerce Commission (the “Commission”), 83 Ill. Adm. Code § 200.190.

In support of this Motion, ComEd states:

1. On October 15, 2014, the ALJs issued their Proposed Order (“PO”) in this proceeding. One of the conclusions in the PO addressed the issue of Customer Care Costs and concluded that \$11 million of such costs should be allocated to ComEd’s supply function. PO at 101-02.

2. The Briefs on Exceptions (“BOE”) of both ComEd and Commission Staff disagreed with the PO’s conclusion on Customer Care Costs. ComEd BOE at 14-18; Staff BOE at 23-31. Nonetheless, ComEd stated that if the Commission determined that such costs should be recovered through the supply function, ComEd would present tariff language in its compliance filing that would modify Rider PE – Purchased Energy and Rate BESH – Basic Electric Service Hourly Pricing so that the costs would be recovered through supply charges.

3. In its Reply BOE (“RBOE”), Staff disagreed with ComEd’s proposal to address a change to Rider PE and Rate BESH in a compliance filing, and proposed that any proposed modification be made pursuant to a 45-day filing. Staff BOE at 24-25.

4. Subsequent to Staff’s filing its RBOE, ComEd and Staff personnel discussed specific revisions to Rider PE and Rate BESH to provide for recovery of the \$11 million through supply charges. As reflected in Attachment A to this Motion, only limited modification is necessary: consisting of one sentence in each tariff, which is redlined in the document.

5. Given the limited nature of the modification to Rider PE and Rate BESH that is necessary to ensure recovery of the \$11 million of Customer Care Costs, Staff no longer objects to this modification being presented in ComEd’s compliance filing. Staff has reviewed this Motion prior to its filing and has no objection to the Commission, in its final Order, directing ComEd to take this approach in its compliance filing in order to ensure synchronization of that change with the related change in ComEd’s delivery service charges.

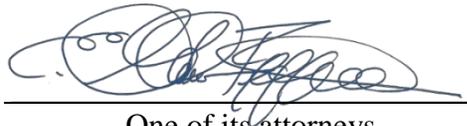
6. ComEd and Staff continue to oppose the PO’s conclusion concerning the Customer Care Cost issue. However, if the Commission adopts the PO’s conclusion on this point, the Commission should direct ComEd to include the necessary changes to Rider PE and Rate BESH as part of its compliance filing.

WHEREFORE, should the Commission determine that \$11 million in Customer Care Costs should be allocated to ComEd’s supply function, the Commission should direct ComEd to include in its compliance filing the proposed modification to Rider PE and Rate BESH, as attached to this Motion.

Dated: December 1, 2014

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

By: 
One of its attorneys

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