

Affidavit Ex. APO-11 – Glossary of Terms and Explanations of Narrative Entries

- ARB means average rate base.
- The CMC is the ComEd Management Committee.
- CX stands for cross-examination.
- FRC means Formula Rate Case.
- FRU means Formula Rate Update
- FTP means File Transfer Protocol, and involves obtaining information from the intranet site where data request responses were stored for use by the rate case team.
- IEDT stands for Illinois Electricity Distribution Tax.
- KPI stands for Key Performance Indicator and is related to ComEd's annual incentive plans and to incentive compensation generally.
- PTM stands for pre-trial memo.
- QC stands for quality check
- RBP stands for responsible business person.
- TC stands for timekeeper code

- In rate cases, the ComEd “steering committee” is a group comprised of internal business people, in-house attorneys and outside counsel who make strategic and policy decisions regarding litigation of each formula rate case. The committee allows for senior level attorneys and business people to guide and coordinate the progress and prosecution of each case.
- Time entries describing “work” on testimony, briefing, motions, affidavits, or proposed orders refer to drafting, reviewing, revising, and strategizing about these items. Time entries describing “attention to” refer to drafting, reviewing, and revising various items. Occasionally “attention to” is also used for attending telephone conferences, meetings, and other items. Time entries that use the phrase “follow up” generally refer to the tasks being conducted in a preceding entry from that same time keeper.
- While our attorneys are generally familiar with Commission rules, we do not expect them to have committed to memory the more detailed and technical rules related to things such as formatting of filings. Moreover, we expect them to verify that rules have not changed since the last time they referenced them. Finally, it is just good practice to review the rules frequently.
- Whenever ComEd is involved in a rate case, we ask outside counsel to assist in the preparation of and present a discovery training session for ComEd’s witnesses and RBPs, which provides instruction regarding, among other things, the data request response process to ensure ComEd is able to process and respond to the anticipated volume of requests within compressed timeframes.

- ComEd convenes weekly status calls or meetings during the pendency of a rate case to ensure that activities are progressing as planned and to assist in coordination of efforts. These calls may also be referred to as “check-in” calls, reporting calls, rate case calls, rate status calls, or rate calls.
- Ancillary charges on the legal invoices attached to my affidavit are often corroborated and further explained by corresponding contemporaneous time entries.
- Invoices from Jenner and Block uses timekeeper numbers instead of initials in its invoices; 0463 represents Barry Levenstam, 0688 represents David DeBruin, 2338 represents Matthew Price, 2419 represents Matthew McKenzie, 2496 represents Elizabeth Bullock, and 2533 represents Ishan Bhabha, who are all attorneys; 0894 represents Mary Patston, who is a paralegal (also known as a legal assistant).
- Although scheduling is sometimes a “routine” matter, in rate cases where there are numerous parties and several rounds of testimony and briefing, scheduling is often time consuming and cumbersome.
- There are parallel issues between the formula rate cases of Ameren Illinois Companies (“AIC”) and ComEd, and it is necessary for our attorneys to review AIC’s positions from time to time.