



Petition as Attachment A to be filed without suspension and with an effective date of June 12, 2015.<sup>1</sup>

In support of this Petition, ComEd states:

### **Background**

1. ComEd is a corporation organized and existing under the laws of Illinois, with its principal office in Chicago, Illinois. ComEd provides retail delivery services, including standard metering service, to approximately 3.8 million customers in northern Illinois. ComEd is a public utility as defined in Section 3-105 of the Act, 220 ILCS 5/3-105, and an electric utility within the meaning of Section 16-102 of the Act, 220 ILCS 5/16-102.

2. The Commission's Order in Docket No. 06-0703 substantially revised 83 Illinois Administrative Code Part 280. The revised Commission rules became effective November 1, 2014, and utilities were provided 18 months to fully comply with the newly-enacted rules. ComEd plans to substantially comply with Section 280.120 in June 2015. The new Section 280.120 Deferred Payment Arrangements ("DPA"), permits a customer to reinstate a DPA an unlimited number of times, subject to certain limitations; however, recognizing there are costs associated with reinstating a DPA, the rules also permit a utility to charge a reinstatement fee for each reinstatement after the first reinstatement provided the utility has filed a tariff establishing a reinstatement fee. 83 Ill. Admin. Code Section 280.120(j)(2)-(4).

3. On April 28, 2015, ComEd filed with the Clerk of the ICC a revised tariff sheet instituting a DPA Reinstatement Fee, to be effective on June 12, 2015. Subsequent to the effective date, ComEd intended to "go live" with an information technology ("IT") upgrade, which would bring ComEd into substantial compliance with Part 280.120 and simultaneously permit unlimited reinstatements of DPAs while charging customers the costs associated with

---

<sup>1</sup> A redlined version of the proposed tariff sheet is attached hereto as Attachment B.

such additional reinstatements. However, upon review of the April 28 filing, Staff of the ICC expressed concerns with certain aspects of the revised tariff provisions – accordingly, ComEd agreed to alter its proposal. On May 20, 2015, ComEd requested that its April 28 filing be withdrawn, and planned to file this petition seeking approval of the revised tariff language in less than 45 days.

4. The tariff revisions proposed herein add a subsection titled DPA Reinstatement Fee to the Other Billing Provisions section of the Billing and Payment part of ComEd’s General Terms and Conditions. The revisions provide for a fee of \$11.81 for each reinstatement subsequent to an initial free reinstatement.

5. The fee that is the subject of this Petition filing is to be assessed beginning no earlier than June 12, 2015.

#### **The Proposed Revision Should be Approved**

6. The proposed revision to the General Terms and Conditions, as explained herein, is in accordance with the Commission’s Order in Docket No. 06-0703 and Part 280 of the 83 Illinois Administrative Code. Enclosed with this filing as Attachment C are work papers providing the supporting data used to calculate the DPA Reinstatement Fee. The data represent ComEd’s best estimates at the time they were made, as they are based upon a number of factors and assumptions that are continually being reviewed and are subject to change. These work papers are being provided to Staff in their native Excel format to enable Staff to review the computations used to determine the value of the DPA Reinstatement Fee.

#### **Special Permission is Warranted**

7. The filing of the revised tariff provisions reflecting a DPA Reinstatement Fee were originally filed on April 28, 2015, with an effective date 45 days after the filing date.

8. Since that filing date, Staff expressed concerns with certain provisions of the tariff. After further discussions, on May 20, 2015, ComEd requested that the tariff filing be withdrawn.

9. This filing addresses Staff's concerns, while at the same time allowing the revised tariff sheet to become effective so that ComEd's IT system changes being made in compliance with Part 280.120 of the Commission's rules may "go live" in June 2015, as originally intended.

WHEREFORE, Commonwealth Edison Company respectfully requests that the Illinois Commerce Commission grant ComEd permission under Section 9-201 of the PUA to place the tariff sheet attached hereto as Attachment A on file without suspension and with an effective date of June 12, 2015.

Dated: May 21, 2015

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

By: /s/ Bradley R. Perkins  
Bradley R. Perkins,  
Counsel for Commonwealth Edison Company

Bradley R. Perkins  
Assistant General Counsel  
Commonwealth Edison Company  
10 S. Dearborn Street, Suite 4900  
Chicago IL 60603  
[bradley.perkins@exeloncorp.com](mailto:bradley.perkins@exeloncorp.com)  
(312) 394-2632

Thomas S. O'Neill  
Senior Vice President, Regulatory and Energy Policy  
and General Counsel  
Commonwealth Edison Company  
440 South LaSalle Street, Suite 3300  
Chicago IL 60603  
[thomas.oneill@comed.com](mailto:thomas.oneill@comed.com)  
(312) 394-7205

**GENERAL TERMS AND CONDITIONS**

(Continued from Sheet No. 204)

**BILLING AND PAYMENT (CONTINUED)**

**OTHER BILLING PROVISIONS (CONTINUED).**

**Interval Data Fee (Continued)**

For service provided beginning June 1, 2011, and extending through the December 2014 monthly billing period, the Interval Data Fee equals \$3.45.

For service provided beginning with the January 2015 monthly billing period, the Interval Data Fee equals \$1.18.

**Invalid Payment Fee**

For a situation in which a retail customer pays for any service rendered by the Company with a check or any other negotiable instrument, including an electronic payment made pursuant to the Company's electronic payment provisions, such payment is not honored, and such payment is returned or charged back to the Company by such retail customer's financial institution due to any reason except error of such institution, the Company charges the retail customer an Invalid Payment Fee for each such invalid payment.

For service provided beginning June 1, 2011, and extending through the December 2014 monthly billing period, the Invalid Payment Fee equals \$21.00.

For service provided beginning with the January 2015 monthly billing period, the Invalid Payment Fee equals \$26.40.

\*

**DPA Reinstatement Fee**

For a situation in which (a) the Company, in accordance with applicable deferred payment arrangement (DPA) provisions of 83 Illinois Administrative Code, identifies a retail customer to be in default with respect to such retail customer's DPA, (b) such retail customer had previously been in default and reinstated with respect to such DPA, (c) such retail customer subsequently requests to have such DPA reinstated, and (d) such retail customer meets all other applicable requirements for such reinstatement, the Company reinstates such DPA for such retail customer and charges the retail customer a DPA Reinstatement Fee. In accordance with the DPA provisions of 83 Illinois Administrative Code, if the retail customer is a low income customer, as defined in Part 280 of such 83 Illinois Administrative Code, the Company is not allowed to charge such retail customer a DPA Reinstatement Fee.

The DPA Reinstatement Fee equals \$11.81.

Notwithstanding the previous provisions of this DPA Reinstatement Fee subsection, the Company is not obligated to reinstate a retail customer's DPA once the Company has disconnected electric service to such retail customer in accordance with applicable credit-related provisions of 83 Illinois Administrative Code.

**Non AMI Meter Reconnection Fee**

For a situation in which the Company, in accordance with applicable credit-related provisions of 83 Illinois Administrative Code, disconnects electric service to a retail customer for which service is provided under Rider NAM, the Company charges and receives payment of the Non AMI Meter Reconnection Fee from such retail customer prior to reconnecting electric service.

The Non AMI Meter Reconnection Fee equals \$63.43.

(Continued on Sheet No. 205.1)

**GENERAL TERMS AND CONDITIONS**

(Continued from Sheet No. 204)

**BILLING AND PAYMENT (CONTINUED)**

**OTHER BILLING PROVISIONS (CONTINUED).**

\* | **Interval Data Fee (Continued)**

For service provided beginning June 1, 2011, and extending through the December 2014 monthly billing period, the Interval Data Fee equals \$3.45.

For service provided beginning with the January 2015 monthly billing period, the Interval Data Fee equals \$1.18.

\* | **Invalid Payment Fee**

For a situation in which a retail customer pays for any service rendered by the Company with a check or any other negotiable instrument, including an electronic payment made pursuant to the Company's electronic payment provisions, such payment is not honored, and such payment is returned or charged back to the Company by such retail customer's financial institution due to any reason except error of such institution, the Company charges the retail customer an Invalid Payment Fee for each such invalid payment.

For service provided beginning June 1, 2011, and extending through the December 2014 monthly billing period, the Invalid Payment Fee equals \$21.00.

For service provided beginning with the January 2015 monthly billing period, the Invalid Payment Fee equals \$26.40.

\* | **DPA Reinstatement Fee**

For a situation in which (a) the Company, in accordance with applicable deferred payment arrangement (DPA) provisions of 83 Illinois Administrative Code, identifies a retail customer to be in default with respect to such retail customer's DPA, (b) such retail customer had previously been in default and reinstated with respect to such DPA, (c) such retail customer subsequently requests to have such DPA reinstated, and (d) such retail customer meets all other applicable requirements for such reinstatement, the Company reinstates such DPA for such retail customer and charges the retail customer a DPA Reinstatement Fee. In accordance with the DPA provisions of 83 Illinois Administrative Code, if the retail customer is a low income customer, as defined in Part 280 of such 83 Illinois Administrative Code, the Company is not allowed to charge such retail customer a DPA Reinstatement Fee.

The DPA Reinstatement Fee equals \$11.81.

Notwithstanding the previous provisions of this DPA Reinstatement Fee subsection, the Company is not obligated to reinstate a retail customer's DPA once the Company has disconnected electric service to such retail customer in accordance with applicable credit-related provisions of 83 Illinois Administrative Code.

**Non AMI Meter Reconnection Fee**

For a situation in which the Company, in accordance with applicable credit-related provisions of 83 Illinois Administrative Code, disconnects electric service to a retail customer for which service is provided under Rider NAM, the Company charges and receives payment of the Non AMI Meter Reconnection Fee from such retail customer prior to reconnecting electric service.

The Non AMI Meter Reconnection Fee equals \$63.43.

\* | (Continued on Sheet No. 205.1)

**Commonwealth Edison Company**  
**Determination of the Deferred Payment Arrangement (DPA) Reinstatement Fee**

**Average Handling  
Cost per Defaulted  
Account**

---

**Labor Costs**

**Revenue Management/Payment Processing Department**

Normal Handling

Clerical Rate for Defaulted Account Handling (Customer Service Representative (CSR))	\$81.36	\$4.75
Estimated Number of Defaulted Accounts Processed per hour (70% of volume)	12	

Special Handling (manually touched accounts)

Clerical Rate for Defaulted Account Handling (CSR). May involve supervisors, backbilling, bankruptcy, etc.	\$81.36	\$6.10
Estimated Number of Defaulted Accounts Processed per hour (30% of volume)	4	

**Other Costs (1)**

Postage	\$0.40	\$0.96
Letter/notice to customer	\$0.48	
Process Payment	\$0.08	

---

**DPA Reinstatement Fee: \$11.81**

Notes:

(1) Provided by the Revenue Management Department

**Commonwealth Edison Company  
 Determination of the DPA Reinstatement Fee  
 Fully Loaded Labor Rate Calculation**

Clerical hourly rate (base labor rate) - Customer Service Representative		<b>\$ 33.35</b>
<b>Adders</b>	<b>% Adder</b>	
Total Fringe Benefits, Pension, Payroll Taxes Rate	88.50%	\$ 29.51
Non-Common (1)	38.81%	\$ 12.94
		\$ 75.80
Common (2)	7.34%	\$ 5.56
<b>Fully loaded Hourly Rate</b>		<b><u><u>\$ 81.36</u></u></b>

Note:  
 Rate and Calculation provided by ComEd General Accounting

- Note: (1) GO 25 Appx C - Non Common Back Office indirect labor costs includes office facilities, human resources function, payroll department and computer equipment and software
- (2) GO 25 Appx C - Common back office indirect costs include accounting, legal, procurement, forms and other administrative and general expenses.

STATE OF ILLINOIS        )  
  ) SS.  
COUNTY OF DUPAGE        )

**VERIFICATION**

I, Martin G. Fruehe, being first duly sworn, state that I am Manager, Retail Rates, for Commonwealth Edison Company, that I have read the foregoing, “Verified Petition to Approve, On Less Than 45 Days’ Notice And Without Suspension, Revisions to Commonwealth Edison Company’s General Terms and Conditions”, and that the facts stated therein are true and correct to the best of my knowledge and belief.

  
\_\_\_\_\_  
Martin G. Fruehe

SUBSCRIBED AND SWORN to  
Before me on the 21<sup>st</sup> day of  
May, 2015.

  
\_\_\_\_\_  
Notary Public

