

OFFICIAL FILE
ILLINOIS COMMERCE COMMISSION
FORMAL COMPLAINT

Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, Illinois 62701

For Commission Use Only:
Case: 15-0435

ORIGINAL

Regarding a complaint by (Person making the complaint): Experis - Manpower Group

Against (Utility name): Commonwealth Edison Company ("Com Ed")

As to (Reason for complaint) - See Attached -

in Chicago Illinois.

TO THE ILLINOIS COMMERCE COMMISSION, SPRINGFIELD, ILLINOIS:

My complete mailing address is (include City) 525 W. Monroe St., Ste 1500 Chicago, IL

The service address that I am complaining about is 525 W. Monroe St., Ste 1500 Chicago, IL

My home telephone is (312) 348-7634

Between 8:30 A.M. and 5:00 P.M. weekdays, I can be reached at (312) 348-7447

Please contact and send to my attorney:

My e-mail address is steonard@aadglaw.com will accept documents by electronic means (e-mail) Yes No

(Full name of utility company) Commonwealth Edison Company (respondent) is a public utility and is subject to the provisions of the Illinois Public Utilities Act.

In the space below, list the specific section of the law, Commission rule(s), or utility tariffs that you think is involved with your complaint.

220 ILCS 5/9-252.1 + 83 Ill. Adm. Code 280.110(b)

Have you contacted the Consumer Services Division of the Illinois Commerce Commission about your complaint? Yes No

Has your complaint filed with that office been closed? Yes No

CHIEF CLERK'S OFFICE
2015 JUL 27
ILLINOIS COMMERCE COMMISSION
[Signature]

Please state your complaint briefly. Number each of the paragraphs. Please include time period and dollar amounts involved with your complaint. Use an extra sheet of paper if needed.

- See Attached -

Please clearly state what you want the Commission to do in this case:

- See Attached -

NOTICE: If personal information (such as a social security number or a bank account number) is contained in this complaint form or provided later in this proceeding, you should submit both a public copy and a confidential copy of the document. *Any personal information (Social Security Number, Driver's License Number, Medical Records, etc.) contained in the public copy should be obscured or removed from the document prior to its submission to the Chief Clerk's office. Any personal information contained in the confidential copy should remain legible.* If personal information is provided in your public copy, be advised that it will be available on the internet through the Commission's e-Docket website. The confidential copy of any filing you make, however, will only be available to Commission employees. If you file both a public and confidential version of a document, clearly mark them as such.

Today's Date: July 23, 2015
(Month, day, year)

Complainant's Signature: [Signature] Attorney For Complainant

If an attorney will represent you, please give the attorney's name, address, telephone number, and e-mail address.

Scott Leonard, A + G Law, LLC
542 S. Dearborn Street, 10th Floor, Chicago, IL 60605
(312)348-7447 sleonard@aandglaw.com

When you finish filling out this complaint form, you need to file the original with the Commission's Chief Clerk. When filing the original complaint, be sure to include one copy of the original complaint for each utility company complained about (referred to as respondents).

VERIFICATION

A notary public must witness the completion of this part of the form.

I, GREGORY STOLLER ^{Director, Strategic sourcing + Real Estate} _{manpowergroup} Complainant, first being duly sworn, say that I have read the above petition and know what it says. The contents of this petition are true to the best of my knowledge.

[Signature]
Complainant's Signature

Subscribed and sworn/affirmed to before me on (month, day, year) 7/23/15

[Signature]
Signature, Notary Public, ~~Illinois~~ Wisconsin

(NOTARY SEAL)

NOTE: Failure to answer all of the questions on this form may result in this form being returned without processing.

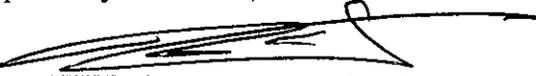
Illinois Commerce Commission
527E. Capitol Avenue
Springfield, Illinois 62701

**ATTACHMENT/SUPPLEMENT
TO FORMAL COMPLAINT
Original File No: 2015-08322**

Complaint by: Experis-Manpower Group against Commonwealth Edison Company
Service Address: 525 W. Monroe Street, Suite 1500, Chicago, Illinois 60661 (“Service Address”)

1. Complainant, “Experis-Manpower Group”¹ (ComEd account number 5220732011) (“Experis”), and by and through attorney, Scott Leonard, hereby files this Complaint against Commonwealth Edison Company (“ComEd”) pursuant to 220 ILCS 5/10-108, based on violations of 220 ILCS 5/9-252.1 and 83 Ill. Adm. Code 280.110(b)
2. On or about August 16, 2013, Experis discovered inaccuracies and overcharges in their utility bills from ComEd. Upon discovering the errors, Experis immediately contacted ComEd who sent a technician to the premises. The ComEd technician verified Experis was in fact being billed incorrectly.
3. Specifically, Experis was wrongfully receiving and paying utility bills for four meters belonging to other companies/customers in its leased premises. This occurred for about seven years.
4. After being contacted by Experis, ComEd corrected the assignment of the meters on or about November 12, 2013. However, Experis has received no credit or reimbursement for the seven years of overcharges.
5. The total amount of overbilling is estimated at \$168,524.43. After recovering approximately \$25,000 from other tenants, without the assistance of ComEd, a balance of approximately \$143,643.00 remains.
6. Despite repeated attempts to resolve the matter, Experis has been unable to resolve this issue with ComEd.
7. Experis demands reimbursement.

Respectfully submitted,

By: 

M. Scott Leonard, Attorney for Complainant

A&G Law, LLC
c/o Scott Leonard, Esq.
542 S. Dearborn Street, 10th Floor, Chicago, Illinois 60605
Tel: (312) 348-7634 Direct: (312) 348-7447
Fax: (312) 348-7658 Email: scott@AandGlaw.com

¹ Complainant “Experis-Manpower Group” is a division of ManpowerGroup US Inc. as assignee of Experis Finance US, LLC (f/k/a Jefferson Wells International, Inc.), the ComEd account holder for this Service Address.