STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY	)	
	)	
Petition to Approve, Revisions to its	)	
Rider DE – Distribution System Extensions	)	
Proposed in Accordance with	)	Docket No. 16-_____
Subsection 410.410(a)(2) of the	)	
83 Illinois Administrative Code and therefore,	)	
Require Approval via Specific Action by	)	
Order of the Illinois Commerce Commission	)	

VERIFIED PETITION OF
COMMONWEALTH EDISON COMPANY

Commonwealth Edison Company ("ComEd" or "the Company") hereby submits this petition ("Petition") to the Illinois Commerce Commission ("Commission" or "ICC") under Subsection 410.410(a)(2) of the Commission's rules, 83 Ill. Adm. Code 410.410(a)(2), requesting expedited approval of revisions to ComEd's Rider DE – Distribution System Extensions ("Rider DE"). The revisions to Rider DE for which the Company is seeking approval are being proposed in accordance with Subsection 410.410(a)(2), and therefore, require "specific action by the Commission by order." 83 Ill. Adm. Code 410.410(a)(2).

The primary purpose of the proposed tariff revisions is to encourage economic development in northern Illinois by setting forth distribution extension provisions for applicants requesting new or incremental increases to electric service, respectively, that are "generally more favorable to applicants than the provisions of subsections (b) and (c) [of Section 410.410]." 83 Ill. Adm. Code 410.410(a)(2). Secondarily, the proposed revisions to Rider DE better organize and clarify the provisions in the rider and align it with the structure developed for general use in the Company's Schedule of Rates.

To ensure compliance with Subsection 410.410(a)(2), ComEd respectfully requests that the Commission enter an order that directs the Company to file the following tariff sheets and allows such filed tariff sheets to become effective:

ILL. C. C. No. 10	2nd Revised Sheet No. 269	canceling	1st Revised Sheet No. 269
ILL. C. C. No. 10	2nd Revised Sheet No. 270	canceling	1st Revised Sheet No. 270
ILL. C. C. No. 10	2nd Revised Sheet No. 271	canceling	1st Revised Sheet No. 271
ILL. C. C. No. 10	2nd Revised Sheet No. 272	canceling	1st Revised Sheet No. 272
ILL. C. C. No. 10	Original Sheet No. 272.1		
ILL. C. C. No. 10	Original Sheet No. 272.2		
ILL. C. C. No. 10	Original Sheet No. 272.3		

These tariff sheets are provided in Attachment A to this Petition and in redline format in Attachment B to this Petition.

In support of this Petition, ComEd states as follows:

1. ComEd is a corporation organized and existing under and by virtue of the laws of the State of Illinois, with its corporate offices located at 440 South LaSalle Street, Suite 3300, Chicago, IL 60605. ComEd is a public utility as that term is defined in Section 3-105 of the Public Utilities Act ("Act"), 220 ILCS 5/3-105, and an electric utility as that term is defined in Section 16-102 of the Act, 220 ILCS 5/16-102.

2. Subsection 410.410(a) addresses extensions of utility distribution systems:

> If an extension of a entity's distribution system is necessary in order to serve an applicant or group of applicants, the entity providing distribution services, upon written request for service by the applicants, shall make the necessary line extension. The line extension shall be made along a street, highway or other right-of-way to the nearest point adjacent to the point of delivery for the applicants. The applicant or group of applicants must agree to the provisions of this Section before the line extension is made.

3. Subsection 410.410(b)(1) states, as follows:

> The line extension furnished without charge shall be the cost equivalent of up to 250 feet of single-phase overhead line per customer and shall include any necessary delivery voltage transformer and its associated protective devices for each customer.

4. Subsection 410.410(c)(1) states, as follows:

> If the cost of the line extension is greater than that allowed in subsection (b), the entity shall make the line extension and shall own, maintain, and replace the line extension upon agreement by the applicant or group of applicants to deposit with the entity an amount under the original or any subsequent extension, equal to the estimated cost of the extension above the free limits.

5. Subsection 410.410(c)(2) states, as follows:

> The cost of extensions in excess of the free limit, and any resulting deposits, shall be allocated among customers based on their respective share of the length of the line extension. Deposits will be refundable based on changed circumstances or shared use for a period of ten years from the date the line extension is placed in service.

6. Subsection 410.410(a)(2) addresses extension provisions that may be utilized in lieu of those identified in Subsection (b) and Subsection (c) of such Section 410.410:

> Alternatively, the filed line extension provision may be in lieu of subsections (b) and (c) instead of an option; however, if the entity providing distribution services files a line extension provision in lieu of subsections (b) and (c), the line extension provision shall not become effective unless the entity providing distribution services demonstrates that the line extension provision is generally more favorable to applicants than the provisions of subsections (b) and (c). After specific action by the Commission by order, the line extension provision shall become effective.

ComEd's Proposed Revisions are Generally More Favorable to Applicants for Distribution System Extensions.

7. ComEd proposes to reduce the number of required deposits by increasing the value of the credit provided against the cost of system extensions. Such credit is proposed to be the cost equivalent of up to five thousand feet of three phase overhead construction, or in some situations, the expected five year revenue through the application of distribution-related charges to the expected incremental electric load. To effectuate this proposal, the Company proposes the following provisions for Rider DE:

> Five Year Expected Delivery Revenue means the Company's expected revenue over a period of five (5) years through the application of appropriate Distribution Facilities Charges (DFCs) and Transformer Charges (TCs) as listed in the Delivery Service Charges Informational Sheets of the Company's Schedule of Rates, with the exclusion of portions of such charges associated with the recovery of uncollectible costs, to the incremental electric power and energy expected to be delivered to a premises for which an extension of the Company's distribution system is necessary.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269.

> Standard Extension Cost means the cost equivalent of providing up to five thousand feet (5,000 ft.) of three phase overhead construction, including any necessary delivery voltage transformer and associated protective devices, for a premises.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269.

> Generally, the Extension Deposit Threshold is equal to the Standard Extension Cost. However, if the entity responsible for the premises for which the Company is required to extend its distribution facilities provides the Company proof of ownership or a signed lease for such premises and successfully completes a credit evaluation and risk screening, then the Extension Deposit Threshold is equal to the greater of (a) the Standard Extension Cost or (b) the Five Year Expected Delivery Revenue.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 270.

> In the event that the Company is required to extend its distribution facilities in order to provide standard electric service to a premises, the Company's distribution system is extended to such premises without the requirement of a deposit paid to the Company provided that the estimated cost of providing such extension does not exceed the Extension Deposit Threshold.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 270.

These proposed tariff revisions are generally more favorable to the applicant for the extension than the corresponding provision set forth in Subsection 410.410(b)(1) and Subsection 410.410(c)(1) of the Code. They are also more favorable than the corresponding currently effective provisions in Rider DE. These proposed revisions will encourage economic development in the Company's service territory.

8. In addition, the Company is proposing revisions to Rider DE that would provide for the refund of a deposit in fewer than ten years under certain circumstances as follows:

> Deposits are refundable, with consideration given to changed circumstances or shared use of the extension, as applicable, for a period of ten (10) years from the date the extension is placed in service. In determining refund amounts, the Company considers the incremental electric power and energy delivered to the premises for which the extension provides service and the revenues the Company receives from the application of applicable DFCs and TCs, as listed in the Delivery Service Charges Informational Sheets of the Company's Schedule of Rates, with the exclusion of portions of such charges associated with the recovery of uncollectible costs, to such incremental electric power and energy.
>
> Notwithstanding the provisions of the previous paragraph, for a situation in which (a) five (5), six (6), seven (7), eight (8), nine (9), or, but no more than, ten (10) years, respectively, have elapsed since the date that an extension was placed into service; (b) the average of the portion of the monthly Maximum Kilowatt Demands (MKDs) over the previous twelve (12) consecutive monthly billing periods established at the premises for the incremental electric power and energy for which such extension was provided is at least seventy-five percent (75%) of the originally projected kilowatt (kW) requirement associated with

> such extension; and (c) a portion of the deposit associated with such extension has not been refunded, the Company refunds such remaining portion.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 271.

These proposed tariff revisions are generally more favorable to the applicant for the extension than the corresponding provision set forth in Subsection 410.410(c)(2). They are also more favorable than the corresponding currently effective provisions in Rider DE and will encourage sustained economic development in ComEd's service territory.

9. The Company is also proposing to allow applicants for an extension of ComEd's distribution system the option to submit an irrevocable letter of credit in lieu of a deposit.

> Notwithstanding the provisions of the Extensions That Require a Deposit section of this rider, the entity responsible for the premises for which the Company is required to extend its distribution facilities in order to provide standard electric service to a premises may elect to provide the Company with an irrevocable letter of credit in favor of the Company from a financial institution in an amount equal to the otherwise required deposit amount instead of paying such deposit as otherwise required in accordance with the provisions of such Extensions That Require a Deposit section.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 272.

Again, this proposed tariff revision is generally more favorable to the applicant for the extension than the corresponding provision set forth in Subsection 410.410(c)(1) as it provides an option to a cash deposit, and it is more favorable than the currently effective provisions in Rider DE.

ComEd's Proposed Revisions Organize and Clarify Provisions in Rider DE and Align it With the General Structure Used in ComEd's Tariffs.

10. ComEd's proposed revisions to Rider DE include the insertion of Applicability, Purpose, Definitions, Extension Deposit Threshold, and Optional Letter of Credit sections to provide for improved organization and clarity in the rider. The inclusion of the Applicability,

Purpose, and Definitions sections also provide for consistency with the general structure that is generally being used in ComEd's Schedule of Rates.

11. ComEd's proposed revisions to Rider DE provide clarification with respect to a number of provisions including the following:

(a) the tariffs and entities to which Rider DE is applicable.

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269.

(b) the purpose of Rider DE

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269

(c) definitions of terms used in Rider DE

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269

(d) amounts included in the determination of applicable revenues

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 269

(e) situations in which a deposit is required

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 271

(f) amounts included in the determination of applicable refunds

ILL. C. C. No. 10: Rider DE Revision, Proposed 2nd Revised Sheet No. 271

(g) amounts included in the determination of lump sum payments

ILL. C. C. No. 10: Rider DE Revision, Proposed Original Sheet No. 272.1

(h) amounts included in the determination of the costs of extensions

ILL. C. C. No. 10: Rider DE Revision, Proposed Original Sheet No. 272.2

(i) the computation of deposits

ILL. C. C. No. 10: Rider DE Revision, Proposed Original Sheet No. 272.2

12. Other proposed revisions to Rider DE improve the organization of the rider by simply moving provisions within the rider. For example, a paragraph pertaining to farming premises is moved from the Extensions That Require a Deposit section to the Miscellaneous General Provisions section because the paragraph may pertain to a situation in which no deposit is required. Similarly, various provisions are moved from the Overview section to the Applicability section, Definitions section, or Determination of Extension Cost and Deposit section because those provisions address Rider DE's application, terms used in Rider DE, or the determination of the cost of an extension, respectively.

Expedited Consideration of the Proposed Revisions to Rider DE is Warranted.

13. Because proposed revisions to Rider DE are different from but generally more favorable to applicants than the otherwise applicable provisions pertaining to distribution system extension as presented in Subsections (b) and (c) of Section 410.410, formal Commission approval is warranted in accordance with Subsection 410.410(a)(2).

14. Because the proposed revisions to Rider DE are generally more favorable to applicants for distribution system extensions, the proposed revisions will encourage economic development in northern Illinois.

15. The proposed provisions to Rider DE are supported by the Chicago Southland Economic Development Corporation, Grundy County Economic Development Council, Village of Franklin Park, and Will County Center for Economic Development. Letters that provide documentation of this support are provided in Attachment C to this Petition.

16. The proposed revisions to Rider DE include an accelerated refund mechanism subject to the realization of at least 75% of the expected new or incremental electricity requirements of the applicant, as noted in Item 8 of this Petition. This provision provides a

measure of confidence that the economic development encouraged by the revisions to Rider DE will be sustainable.

17. In making the proposed revisions to Rider DE, ComEd acknowledges that the costs of some distribution system extensions will be included in its distribution system rate base sooner than is currently happening, which can have an impact on ComEd's other customers. ComEd performed an analysis of the bill impacts the proposed revisions to Rider DE may have on other customers, the results of which are presented in Attachment D to this Petition. The results indicate that the potential bill impacts on other customers within ComEd's service territory as a result of implementing the proposed revisions to Rider DE are not substantial. For customers in the residential sector the potential impact may amount to up to a few cents per bill. For other delivery classes there is potentially no impact. Customers in some delivery classes may even realize decreases in monthly bills due to the increased load added to the system for which distribution system extensions are provided. While ComEd has estimated potential bill impacts under two plausible scenarios, the actual impact on distribution plant and load associated with new customers as well as potential offsetting capital spend reductions is unknown at this time. For this reason, providing better estimates or even actual changes in rates is not possible. Work papers supporting the information presented in Attachment D have been provided to the Staff of the ICC.

18. The proposed revisions to Rider DE include applicant credit check provisions, as noted in Item 7 of this Petition, which provide for a measure of protection for ComEd and its customers.

19. Formal approval by the Commission of the proposed revisions to Rider DE as presented in Attachment A to this Petition by the Commission is required pursuant to Subsection 410.410(a)(2).

20. ComEd is currently in discussions with a large food processing company and a large plastics manufacturer who are evaluating whether to locate their new facilities as well as their associated jobs in Illinois. Formal approval by the Commission of the proposed revisions to Rider DE as presented in Attachment A to this Petition is requested on an expedited basis so that mechanisms encouraging economic development can be implemented as quickly as possible.

WHEREFORE, Commonwealth Edison Company respectfully requests that the Illinois Commerce Commission, under Subsection 410.410(a)(2), approve on an expedited basis the proposed revisions to Rider DE – Distribution System Extensions and grant permission to file the tariff sheets attached hereto as Attachment A with the Illinois Commerce Commission.

Dated: February 10, 2016.

Respectfully submitted,

COMMONWEALTH EDISON COMPANY

By: _____
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One of its Attorneys

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VERIFICATION

I, Martin G. Fruehe, being first duly sworn on oath, depose and say that I am Manager Retail Rates, of Commonwealth Edison Company, the Petitioner herein, and I have read the foregoing Verified Petition, that I am familiar with the contents thereof, and the facts as stated therein are true and correct to the best of my knowledge, information and belief.

Martin G. Fruehe

Signed and sworn to before
me this 9th day of February, 2016.

Notary Public

OFFICIAL SEAL
JOHN L LEICK
NOTARY PUBLIC - STATE OF ILLINOIS
MY COMMISSION EXPIRES:09/03/17