

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. 16-0071
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)	

STAFF OF THE ILLINOIS COMMERCE COMMISSION'S
VERIFIED RESPONSE TO
THE COMMONWEALTH EDISON COMPANY'S VERIFIED PETITION

NOW COMES the Staff of the Illinois Commerce Commission (Staff) by and through its undersigned counsel, and, for its Response to the Commonwealth Edison Company's Verified Petition seeking approval of revisions to its Rider DE – Distribution Systems Extensions in accordance with 83 Ill. Adm. Code 410.410(a)(2), states as follows:

1. On or about February 11, 2016, the Commonwealth Edison Company (ComEd) filed its Petition initiating this proceeding. See Petition.
2. In its Petition, ComEd seeks approval of revisions to its Rider DE – Distribution Systems Extensions in accordance with 83 Ill. Adm. Code 410.410(a)(2). Petition, ¶11.
3. Section 410.410 of the Commission's rules prescribe the method by which electric utilities are to make extensions of distribution facilities to unserved customers, and more specifically, the length of extensions which will be free of charge to such customers, and conversely the length of extensions for which customers shall be required to pay. See, *generally*, 83 Ill. Adm. Code 410.410.

4. Section 410.410(a)(2) authorizes utilities to, through their filed tariffs, effectively “opt out” of the main extension requirements as set forth in Section 410.410.

More specifically, Section 410.410(a)(2) provides that:

Alternatively [to the extension requirements as provided for by rule], the filed line extension provision may be in lieu of ... [such requirements]; however, if the entity providing distribution services files a line extension provision in lieu of ... [provisions required by rule], 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 required by rule]. After specific action by the Commission by order, the line extension provision shall become effective.

83 Ill. Adm. Code 410.410(a)(2)

5. ComEd asserts, in its Petition, that the main extension provisions contained in its proposed revisions to Rider DE result in line extension provisions that are generally more favorable to applicants than those provided for by rule. Petition, ¶¶7-9, 14, 16.

6. ComEd requests an order from the Commission determining that its proposed revisions to Rider DE result in line extension provisions that are generally more favorable to applicants than those provided for by rule. Petition, ¶19.

7. ComEd asserts that certain significant economic development benefits are likely to result from the Commission granting its Petition. Petition, ¶¶14, 15, 20.

8. ComEd requests expedited treatment of its Petition. Petition, ¶20.

9. The Staff, having reviewed the request, and engaged in discussions of the matter with ComEd representatives, concludes that ComEd's proposed revisions to Rider DE result in line extension provisions that are generally more favorable to applicants than those provided for by rule, within the meaning of Section 410.410(a)(2) of the

Commission's Rules. Petition, ¶¶7-9, 14, 16; see *also* Affidavit of Greg Rockrohr, attached as Exhibit No. 1 hereto and incorporated by this reference herein.

WHEREFORE, for the reasons set forth above, Staff respectfully requests that the Commission grant the relief sought by ComEd in its Petition.

Respectfully submitted,

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Illinois Commerce Commission

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February 16, 2016

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COUNTY OF SANGAMON)

AFFIDAVIT

Greg Rockrohr, upon oath, deposes and states that he is competent to testify and that, if called upon to testify in the above captioned proceeding, he would testify as follows:

1. I am employed by the Illinois Commerce Commission (“Commission”) as a Senior Electrical Engineer in the Safety and Reliability Division of the Public Utilities Bureau.

2. I have reviewed the Petition filed by the Commonwealth Edison Company (ComEd) in the above-captioned proceeding. I have also had cause to discuss the tariff revisions proposed by ComEd, their application, and the manner in which they would be affected by Commission rules, with ComEd representative prior to the filing of ComEd’s Petition. I am therefore familiar with ComEd’s proposed tariff revisions and the manner in which they will apply, as well as with the waiver sought.

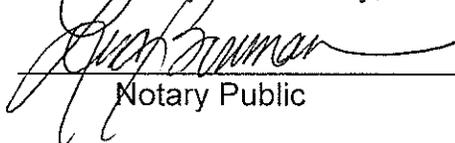
3. In my opinion, ComEd’s proposed revisions to Rider DE result in line extension provisions that are generally more favorable to applicants than those provided for by rule, within the meaning of Section 410.410(a)(2) of the Commission’s Rules. I recommend that the Commission enter an order authorizing the revisions.

Further affiant sayeth naught.



Greg Rockrohr

Subscribed and Sworn before me
this 16th day of February, 2016



Notary Public

