

ICC Docket No. 16-0259**Commonwealth Edison Company's Response to
The People of the State of Illinois ("AG") Data Requests****AG 15.01 - 15.06****Date Received: June 13, 2016****Date Served: July 1, 2016****REQUEST NO. AG 15.01:**

(2012-2015 Capital Investment) Provide the non-EIMA capital investment and the EIMA capital investment by jurisdiction and total company for each of the years 2012 through 2015 and cumulative. In addition, provide a comparison of the actual capital investment made in each of the years to the amount required by Section 16-108.5(b).

RESPONSE:

ComEd objects to this request to the extent it requests information related to calendar years 2012 - 2014, which are outside the scope of, and irrelevant to, ComEd's 2016 Formula Rate Update and Reconciliation proceeding. Further, ComEd objects to this request as overly broad and unduly burdensome as total capital investment -- which is not the same as rate base additions -- is not functionalized to Transmission or Distribution (which ComEd understands the reference to jurisdiction to refer to in this context). Such data is not reasonably available and is not reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving these foregoing objections, or any of ComEd's General Objections, ComEd responds as follows:

Capital expenditures include amounts expended on investment during a calendar year, regardless of whether an asset was completed and in service, and regardless of whether the expenditure results in any change to rate base in that year. In contrast, additions to Plant In Service represent projects completed and placed in service during the year, and will include expenditures made in all prior periods related to the projects. Additions to Plant In Service are included in ComEd's rate base calculation.

See the attachment labeled as AG 15.01_Attach 1 for a summary of ComEd Distribution related additions to plant in service for 2012 through 2015 broken down by jurisdiction and EIMA.

2012 through 2015 ComEd Capital Additions (Plant In Service) - EIMA and Non-EIMA
(\$ in millions)

	Total ComEd					EIMA Portion of Total ComEd					Non-EIMA Portion of Total ComEd				
	2012-2015	2015 (a)	2014 (b)	2013 (c)	2012 (d)	2012-2015	2015	2014	2013	2012	2012-2015	2015	2014	2013	2012
Before Jurisdictional Adjustments															
Distribution	\$ 3,773.4	\$ 1,304.7	\$ 967.8	\$ 782.7	\$ 718.2	\$ 1,392.4	\$ 604.0	\$ 395.3	\$ 226.9	\$ 166.2	\$ 2,381.0	\$ 700.7	\$ 572.5	\$ 555.8	\$ 552.0
General and Intangible	915.3	293.1	256.4	150.7	215.1	202.6	75.4	79.0	38.0	10.2	712.7	217.7	177.4	112.7	204.9
Total	\$ 4,688.7	\$ 1,597.8	\$ 1,224.2	\$ 933.4	\$ 933.3	\$ 1,595.0	\$ 679.4	\$ 474.3	\$ 264.9	\$ 176.4	\$ 3,093.7	\$ 918.4	\$ 749.9	\$ 668.5	\$ 756.9
Jurisdictional															
Distribution	\$ 3,773.4	\$ 1,304.7	\$ 967.8	\$ 782.7	\$ 718.2	\$ 1,392.4	\$ 604.0	\$ 395.3	\$ 226.9	\$ 166.2	\$ 2,381.0	\$ 700.7	\$ 572.5	\$ 555.8	\$ 552.0
General and Intangible	749.0	233.4	216.6	125.0	174.0	168.7	62.2	67.9	30.8	7.8	580.3	171.2	148.7	94.2	166.2
Total	\$ 4,522.4	\$ 1,538.1	\$ 1,184.4	\$ 907.7	\$ 892.2	\$ 1,561.1	\$ 666.2	\$ 463.2	\$ 257.7	\$ 174.0	\$ 2,961.3	\$ 871.9	\$ 721.2	\$ 650.0	\$ 718.2

Source of Information:

- (a) Docket 16-0259, ComEd Ex. 5.03, page 1
- (b) Docket 15-0287, ComEd Ex. 6.03, page 1
- (c) Docket 14-0312, ComEd Ex. 6.03, page 1
- (d) Docket 13-0318, ComEd Ex. 5.03, page 1