

ICC Docket No. 01-0423

Response of Commonwealth Edison Company
To ARES Coalition's Third Set of Data Requests
To Commonwealth Edison Company
Dated July 13, 2001

ORIGINAL FILE

ICC DOCKET NO. 01-0423

ComEd Exhibit No. 95

Witness

Date 11/16/01 Reported

ARES 3.10 Testimony of Edison Witness Sterling

Lines 243-251, lines 548-569

Referring to ComEd Ex. 13, Attachment G, it appears that under ComEd's proposal, customers taking PPO service would be charged less than customers taking delivery service from an ARES (0.202¢ per kWh compared to 0.230¢ per kWh) although the higher figure (0.230¢ per kWh) is used to determine CTCs.

- a. Please confirm whether this observation is accurate.
- b. If this observation is not accurate, please explain in detail why not.
- c. If this observation is accurate, please explain the basis, if any, for this difference.

RESPONSE:

ComEd notes that this Data Request is incorrectly referred to witness Sterling. The reference is to the testimony of Ms. Kelly and Mr. Alongi.

The assumption made in this data request is not accurate, in two respects. First, the Transmission Service Charges (TSCs) for PPO and ISS customers under Rate TS are calculated based upon the actual charges paid to ARTO by ComEd by reason of the use of transmission related services by Rider PPO and Rider ISS customers. On an aggregate level, an ARES serving customers with the same use of transmission related service as Riders PPO and ISS customers will be charged, as agent for the retail customers, the same amount by ARTO. Rider TS neither discounts nor adds to that amount. On an individual customer by customer basis, ComEd has specified in Rider TS how it proposes to allocate the ARTO charges among specific customers -- on a per kWh basis. ComEd cannot predict or control how any particular ARES chooses to divide that same total charge among its customers. An ARES has considerable freedom in this respect.

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Second, it appears that the data request also fails to consider ComEd's use of sample data. As noted above, TSCs will be based on actual use. Because ComEd cannot predict the future, ComEd provided example calculations based on data from a sample period. Attachment G to Exhibit 13.0 reflects such sample data, and is provided to illustrate calculation methodologies used in proposed Rider TS. In this case, the sample of ISS/PPO customers had a lower rate than the example system-wide credit because those customers had lower than system average peak demands, and thus used lower than average amounts of transmission related services. That is not the result of any preference for Riders PPO and ISS customers, but is simply a function of the load factor of the sample. Once again, an ARES serving the same group of customers would see the same charges.

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