

Commonwealth Edison Response to Staff Request for Comments

Commonwealth Edison Company (“ComEd”) appreciates the opportunity to provide comments concerning the need for rulemaking proceedings on energy efficiency and demand response matters, as requested by Staff at the Energy Efficiency and Demand Response Workshop held on November 7, 2008. It is ComEd’s position that a rulemaking concerning energy efficiency and demand response is not necessary at this point in time.

Enactment of Public Act 95-0481 created a new Section 12-103 of the Illinois Public Utilities Act, which, among other things, set forth new energy efficiency and demand response goals. With this descriptive legislation, ComEd was able to file, and the ICC approved, a detailed, three-year Energy Efficiency and Demand Response Plan. ComEd has implemented the Plan and has been an active participant in the Stakeholder Advisory Group (SAG) that has been formed for its Plan. Given that the SAG is in place to address issues or concerns as they arise and has been successful addressing these issues to date, it is unclear how any new rules would help augment the current process.

Additionally, ComEd and many of the parties will soon be participating in a two-year Statewide Smart Grid Collaborative, as ordered by the Illinois Commerce Commission in Docket No. 07-0566 and Docket Nos. 07-0585 – 0590 (cons.). The results of this Collaborative, while currently unknown, will almost certainly impact ComEd’s energy efficiency and demand response activities in the future. Thus, any rulemaking proceedings that begin prior to the conclusion of the Smart Grid collaborative process would be premature and subject to change.

Thank you again for this opportunity to provide comments.