BERMAN AND TODDERUD LLP

3502 FREMONT AVENUE N., SUITE 1
SEATTLE, WASHINGTON 98103

Stan Berman
Direct Dial (206) 279-3193
stan@btlawllp.com

May 1, 2025

Re: Tariff Filing to Clarify Transmission Rate Treatment of Asset Retirement Obligation Costs and Depreciation
Docket No. ER25-_____

Debbie-Anne A. Reese
Secretary
Federal Energy Regulatory Commission
888 First Street, NE
Washington, D.C. 20426

Dear Secretary Reese:

Pursuant to Section 205 of the Federal Power Act ("FPA")[1] and Part 35 of the regulations of the Federal Energy Regulatory Commission ("FERC" or "Commission"), Commonwealth Edison Company ("ComEd") submits revised rate schedules reflecting updates to Attachment H-13A of the PJM Interconnection LLC Open Access Transmission Tariff ("PJM OATT") governing ComEd's Asset Retirement Obligations ("ARO").[2] The tariff revisions are made in compliance with Order No. 631[3] and 18 C.F.R. § 35.18(a). The proposed revisions clarify that ComEd has addressed the relevant procedural requirements for ARO recovery in ComEd's rate, but do not change rate

[1] 16 U.S.C. § 824d.

[2] Pursuant to Order No. 714, this filing is submitted by PJM Interconnection, L.L.C. ("PJM") on behalf of ComEd as part of an XML filing package that conforms with the Commission's regulations. PJM has agreed to make all filings on behalf of the PJM Transmission Owners in order to retain administrative control over the PJM Tariff. Thus, ComEd has requested PJM submit this revision to Attachment H-13A in the eTariff system as part of PJM's electronic Intra PJM Tariff.

[3] *Accounting, Financial Reporting, and Rate Filing Requirements for Asset Retirement Obligations*, Order No. 631, 103 FERC ¶ 61,021 (2003) ("Order No. 631").

levels in any way. Because rate levels are unchanged and the modification will clarify ComEd's rate, ComEd requests waiver of the 60 day notice requirement and requests that the amendment be made effective May 1, 2025. If waiver is not granted, ComEd requests the earliest possible effective date.

I. DESCRIPTION OF APPLICANT

ComEd, an Illinois corporation, is an operating subsidiary of Exelon Corporation, a Pennsylvania corporation. ComEd maintains more than 91,000 miles of overhead and underground transmission and distribution facilities in northern Illinois, as well as transmission facilities in Northern Indiana owned by its subsidiary Commonwealth Edison Company of Indiana, Inc. and provides delivered electric power to more than four million customers. ComEd transferred operational control over its transmission facilities to PJM on May 1, 2004. ComEd's retail electric service is regulated by the Illinois Commerce Commission ("ICC"), while PJM's provision of transmission service over its transmission facilities and its sales for resale of electric energy in interstate commerce are regulated by the Commission.

II. PERSONS TO WHOM CORRESPONDENCE SHOULD BE ADDRESSED

Stan Berman Eric Todderud Berman and Todderud LLP 3502 Fremont Avenue N. Seattle, WA 98103 (206) 279-3193 stan@btlawllp.com	Max Minzner Vice President and Deputy General Counsel Exelon Corporation 701 Ninth Street N.W. Washington, D.C. 20001 (202) 934-4740 Max.Minzner@exeloncorp.com Cynthia Holland Associate General Counsel Exelon Corporation 701 Ninth Street N.W. Washington, D.C. 20001 (267) 533-1671 Cynthia.Holland@exeloncorp.com

III. STATEMENT OF NATURE, REASONS, AND BASIS FOR FILING

Like many utilities, ComEd is legally required to incur remediation or removal costs when it retires certain long-lived assets. Those obligations are referred to as Asset Retirement Obligations ("AROs"). Removal and remediation requirements can arise pursuant to a statute or regulation, such as laws requiring asbestos abatement or the removal of underground tanks. AROs also can arise or under a lease or contract, such as the obligation to restore property after the expiration of a leasehold interest.

ComEd adopted a formula transmission rate in 2007. That 2007 formula specified the treatment of Asset Retirement Costs ("ARCs") and related depreciation in the rate. The rate filing was set for hearing but settled prior to hearing. The settlement retained the originally proposed ARO treatment, albeit reflected at slightly different line numbers in the formula, because some unrelated lines in the formula were changed in the settlement. In the following eighteen years, through today, ComEd has recovered ARO costs through its transmission rates, with the ARO cost components clearly identified in its tariff.[4]

Questions have arisen in a recent FERC audit (in Docket No. FA21-5-00) concerning whether ComEd correctly documented ARO costs in its 2007 tariff filings. As a result, ComEd is making this Section 205 filing to eliminate any doubt about the prospective appropriate treatment in rates of ComEd ARO costs.

1. ARO BACKGROUND

Prior to 2003, ComEd recognized removal and remediation costs as an element of depreciation and accounted for those costs through its depreciation accounts.[5] At that time, ComEd had stated rates, not a formula rate.

In 2001, the Financial Accounting Standards Board ("FASB") issued Statement of Financial Accounting Standards (FAS) 143, governing the accounting for AROs. ComEd implemented those standards in 2003.

FAS 143 calls for measuring the ARO at fair value at the time it is to be implemented (i.e., at the time of anticipated retirement), with the liability discounted to present value. In other words, the retirement obligation liability reflects the fair value of the obligation at the balance sheet date. The liability recorded represents an obligation for the future retirement of certain assets and, as a result, accretion expense is accrued on this liability until such time as the obligation is satisfied. Accretions are based on interest rates and effectively add amounts to the previous value of the reserved amount, so that the full amount of the removal/remediation obligation will be accounted for at the time of retirement.

ARCs are recorded as assets offsetting the ARO liabilities. The ARC represents the estimated cost to remove or dismantle a long-lived asset, which is discounted to the net present value at the time the liability to remove or dismantle the asset is incurred—

[4] PJM OATT, Attachment H-13A, lines 15 (which includes ARC in Account 359.1) and 86 (which includes ARC depreciation from Account 403.1). Attachment H-13A Attachment H-13A sets forth the formula transmission rate on ComEd's system ("ComEd Formula Rate"). The rules applicable to calculations of the ComEd Formula Rate are at PJM OATT, Attachment H-13B.

[5] Prepared Direct Testimony of Erin White, COM-0001, attached, at Exhibit No. COM-0001 ("White Test.").

usually, when the asset is installed. General Instruction 25A of the Commission's Uniform System of Accounts supplies the following definition of ARC: "[T]he amount capitalized when the liability is recognized for the long-lived asset that gives rise to the legal obligation."

ComEd depreciates the ARC over the useful life of the related long-term asset. It records interest for the accretion of the ARO liability over time. The undepreciated portion of the ARC is treated in rates as a part of rate base, earning a return like other utility plant. ComEd accounts for annual ARC depreciation expense in the same fashion as plant depreciation, with the annual amount flowing through rates each year as an expense. On a periodic basis, ComEd revises the balances in the ARO, ARC and accumulated depreciation accounts to reflect changes in expectations as well as accretion and depreciation over time.[6] Ultimately, at the end of the life of the underlying asset, the recovery of ARC should be sufficient to pay for the actual costs incurred in meeting the retirement obligation.

ComEd also follows the instructions of Financial Interpretation No. ("FIN") 47, which is a FASB interpretation of FAS 143 applicable to assets for which the obligation of remediation or removal is conditioned on some future event. FIN 47 required ComEd to record liabilities associated with its conditional AROs at their estimated fair values if those fair values can be reasonably estimated. This requirement caused ComEd to update an existing inventory, originally created for the adoption of FAS 143, to identify assets associated with conditional obligations and to determine which, if any, of the conditional AROs could be reasonably estimated.

Upon the adoption of FIN 47, ComEd determined that it could estimate fair values for the obligations through the exercise of management judgment. ComEd used those estimates to calculate the present value of future estimated cash flows using credit-adjusted, risk-free rates applicable to ComEd in order to determine the fair value of the conditional AROs at the time of adoption of FIN 47. Consistent with the requirements of FIN 47, ComEd recognized the following amounts within its financial statements upon the adoption of FIN 47: (i) a liability for any existing conditional AROs adjusted for cumulative accretion to December 31, 2005; (ii) an asset retirement cost (ARC) capitalized as an increase to the carrying amount of the associated long-lived assets; and (iii) cumulative depreciation on the ARC. The transition guidance in FIN 47 required that its adoption be accomplished through a cumulative change in accounting principle

[6] White Test. at 8:4-13.

measured as the difference between the amounts recognized in the financial statements prior to the adoption of FIN 47 for conditional AROs and the amounts recognized as of December 31, 2005 pursuant to FIN 47. ComEd recorded an ARO of $150 million, an ARC asset of $5 million, and an adjustment through regulatory accounting of $130 million on its balance sheet and a pre-tax charge due to a cumulative effect of change in accounting principle within its income statement of $15 million.

2. ComEd Formula Rate

As previously noted, ComEd had stated transmission rates when it altered its accounting in the early 2000s to implement FAS 143 and FIN 47. ComEd filed a formula transmission rate tariff for the first time in 2007.[7] The tariff filed in 2007 specified the treatment by ComEd of ARCs and related depreciation. Indeed, a customer group, the Illinois Municipal Electric Agency ("IMEA"), protested the 2007 filing, specifically challenging ComEd's treatment of ARCs in the formula.[8] There was no question that AROs were part of the newly-filed ComEd transmission formula.

The Commission set the 2007 matter for settlement judge proceedings and hearing, including the ARO issue raised by IMEA.[9] The parties eventually reached a settlement, which ComEd filed on October 5, 2007.[10] The settlement did not alter the ARO recovery mechanism set forth in the initial tariff filing (but did change line numbers, due to unrelated changes to other parts of the formula). As part of its settlement filing, ComEd requested waiver of all procedural requirements not specifically addressed

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[7] Docket No. ER07-583, Section 205 Rate Application, (March 1, 2007) ("Application of March 1, 2007").

[8] Protest of Illinois Municipal Electric Agency at 28, Docket No. ER07-583 (April 18, 2007) ("[t]he Asset Retirement Cost of Transmission Plant was improperly included in the total of transmission plant in service entered at Line 19 of Attachment H-13A and should be removed.").

[9] *Commonwealth Edison Co.,* 119 FERC ¶ 61,238 (2007) (Order establishing hearing); *Commonwealth Edison Co.*, Order of Chief Judge Appointing Settlement Judge and Scheduling Prehearing Conference, Docket No. ER07-538 (Jun. 12, 2007) (Accession No. 20060612-3017).

[10] *Commonwealth Edison Co.*, Settlement Agreement and Offer of Settlement, Docket No. ER07-583 (Oct. 5, 2007) ("ComEd 2007 Settlement") (Accession No. 20071011-0032).

in the filing.[11] The Commission accepted the settlement on January 16, 2008.[12] The ARO provisions became part of ComEd's filed rate.

For ease of reference, ComEd excerpts the relevant portions of its settled formula below:

- Line 15 of the settled formula rate states that transmission plant will be taken from "p207.58.g" of the FERC Form 1—in other words, page 207, Line 58, column g.

Plant Calculations			
	Plant In Service		
15	Transmission Plant In Service	(Note B) (Note Q)	p207.58.g

- In turn, page 207, Line 58, column g is the end-of-year plant balance for Total Transmission Plant, and itself reflects the total of lines 48 through 57. Line 57 lists "Asset Retirement Costs for Transmission Plant" and references Account 359.1, which is the ARC account created by Order No. 631.

47	3. TRANSMISSION PLANT
48	(350) Land and Land Rights
49	(352) Structures and Improvements
50	(353) Station Equipment
51	(354) Towers and Fixtures
52	(355) Poles and Fixtures
53	(356) Overhead Conductors and Devices
54	(357) Underground Conduit
55	(358) Underground Conductors and Devices
56	(359) Roads and Trails
57	(359.1) Asset Retirement Costs for Transmission Plant
58	TOTAL Transmission Plant (Enter Total of lines 48 thru 57)
59	4. DISTRIBUTION PLANT

- Likewise, line 86 of the settled formula rate lists "Transmission Depreciation Expense Including Amortization of Limited Term Plant," which references "p.336.7.b&c&d"—in other words, FERC Form 1, page 336, Line 7, columns b, c, and d.

Depreciation & Amortization Expense			
	Depreciation Expense		
86	Transmission Depreciation Expense Including Amortization of Limited Term Plant	(Note J)	p336.7.b&c&d

- In turn, page 336, line 7, column c of the FERC Form 1 references "Depreciation Expense for Asset Retirement Costs (Account 403.1)" with respect to

[11] *See* ComEd 2007 Settlement § 6.3; *id.*, Explanatory Statement, at p. 10.

[12] *Commonwealth Edison Co.,* 122 FERC ¶ 61,030 (2008).

"Transmission Plant."

	A. Summary of Depreciation and Amortization Charges				
Line No.	Functional Classification (a)	Depreciation Expense (Account 403) (b)	Depreciation Expense for Asset Retirement Costs (Account 403.1) (c)	Amortization of Limited Term Electric Plant (Account 404) (d)	Amo Oth Plan
1	Intangible Plant			20,902,883	
2	Steam Production Plant				
3	Nuclear Production Plant				
4	Hydraulic Production Plant-Conventional				
5	Hydraulic Production Plant-Pumped Storage				
6	Other Production Plant				
7	Transmission Plant	39,635,490	19,655	122,265	
8	Distribution Plant	263,062,765	75,022	1,830	
9	Regional Transmission and Market Operation				
10	General Plant	53,734,858		2,351,877	
11	Common Plant-Electric				
12	TOTAL	356,433,113	94,677	23,378,855	

Thus, the formula rate is clear: it includes ARC for Transmission Plant recorded in Account 359.1 and also includes Depreciation Expense for ARC for Transmission Plant recorded in Account 403.1.[13]

3. Order No. 631 and Audit Staff Dispute

Order No. 631, issued in 2003, framed the current accounting requirements for utilities recovering ARO related costs. The purpose of the Order was:

> to improve the usefulness and transparency of financial information provided to the Commission and other users of the FERC Forms by

[13] ARC depreciation also impacts Transmission Accumulated Depreciation (Formula Line 30) which is based on the total reported on Form 1, Page 219, line 25c. That total at page 219 of the Form 1 factors in Depreciation Expense for ARC (Form 1, Page 219, Line 4) and ARC Retired (Form 1, Page 219, Line 18). The ComEd Formula also includes General Plant in rate base, allocated to transmission using the Wages and Salary Allocator. The Formula references to General Plant, and depreciation of General Plant, like those for Transmission Plant, expressly cite to the Form 1 lines that include ARC and Depreciation Expense for ARC. The plant and depreciation totals (Formula Lines 6 and 7), which in turn refer to the totals at Form 1, Pages 207 and 219, also factor in ARC and ARC Depreciation, and are used as part of the calculation of net plant and gross plant allocation factors.

> establishing uniform accounting and reporting requirements for legal obligations associated with the retirement of tangible long-lived assets.[14]

Through Order No. 631, the Commission promulgated the regulation governing ARO cost recovery. Codified at 18 C.F.R. § 35.18, the regulation required utilities that seek ARO cost recovery to secure Commission approval to do so and to file a schedule identifying components of the ARO costs for which recovery is sought.[15] The Commission also established a new primary account under the Uniform System of Accounts, Account 359.1, for recording ARCs, and account 403.1 for recording depreciation of those ARCs.

The Commission explained that the accounting changes were not intended to impair the ability of jurisdictional utilities to recover through rates the costs of their ARO obligations.[16] Furthermore, utilities that did not have formula rates were not required to make any rate filing to comply with Order No. 631.[17]

In 2023, Audit Staff raised questions regarding the validity of ARO cost recovery in its audit of ComEd's rates.[18] Audit Staff claims that the settlement, which the Commission accepted in early 2008, was inadequate to support recovery of AROs.[19] ComEd and Audit Staff are currently litigating past ARO recovery.[20] With respect to

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[14] Order No. 631, P 4.

[15] 18 C.F.R. § 35.18(a).

[16] Order No. 631, P 6.

[17] *Id.,* P 60 ("The Commission is not requiring jurisdictional entities with stated rate tariffs to make any tariff filings with the Commission due to this final rule at this time.")

[18] *See Commonwealth Edison Co.,* Docket No. FA21-5, Letter Order from Janel Burdick to E. Glenn Rippie, Docket No FA21-5-000 (July 27, 2023) (Audit Report, at pp. 38-44) (Accession No. 20230727-3010); *see also* Letter from Janel Burdick to Veronica Gomez, Docket No. FA21-5-000 (April 21, 2021) (commencing audit) (Accession No. 20210421-3015).

[19] *Id.*

[20] As part of its ARO implementation, ComEd set up an accounting entry which debits FERC Account 108 and credits FERC Account 403. ComEd set this entry up in order to avoid double recovery of any asset retirement settlement costs because the amounts were then still included in ComEd depreciation rates. ComEd should have ceased this journal entry subsequent to a new depreciation study that was performed in 2007. But ComEd mistakenly continued to record this

future ARO recovery, ComEd has advised Audit Staff of this filing, which is explicitly seeking Commission review of the ARO recovery (but recognizing that it is ComEd's position that such recovery has been authorized since 2007).

4. Detailed Description of Rate Changes and Supporting 35.18 Schedule

ComEd is, through this filing, including an amendment to its tariff to clarify prospectively that its ARO treatment has been reviewed and is properly part of the ComEd transmission formula. ComEd also provides with this filing a schedule (Exhibit No. COM-0003) supporting its ARO amounts, consistent with 18 C.F.R. § 35.18.

Exhibit No. COM-0001 contains detailed testimony from ComEd's Director of Accounting regarding how ComEd accounts for ARO. The testimony explains and verifies the material in Exhibit COM-0003 which includes a schedule showing the components of ComEd's ARO cost recovery, consistent with 18 C.F.R. § 35.18. The testimony also explains that the removal costs classified as ARO do not overlap with certain other "cost of removal" costs that are recovered as part of ComEd's depreciation rates – there is no double recovery.

As can be seen in the redline tariff sheets, at Attachment 1, the only revision to the Formula Rate tariff is the inclusion of a new footnote X, and references to the footnote at several lines of the formula, which upon acceptance of this filing, expressly acknowledging that the Commission has reviewed and approved the ARO treatment in the formula. The tariff change makes no substantive change to the ComEd rate or the rate formula, and thus does not alter in any way the amount of recovery by ComEd, as is further discussed in the White Testimony at 20:8-16. Customers bear no costs as a result of this amendment. (The White Testimony includes as Exhibit No. COM-0004 a calculation of the annual rate impact of ARO in the ComEd formula. But again, this filing does not change that annual rate impact – the rate impact of this filing is zero.)

IV. COMPLIANCE WITH COMMISSION REQUIREMENTS

journal entry, which has resulted in ComEd under recovering ARO costs from 2007 through 2024 when the error was corrected. The Audit pointed out this error, and ComEd has agreed to fix the error going forward. Again, the error resulted in under-recovery by ComEd and did not harm customers– ComEd does *not* propose to remedy that under-recovery in prior years.

A. List of Documents Submitted

ComEd submits the following documents:

1. This transmittal letter;

2. Prepared Direct Testimony of Erin White comprised of:

    a. Exhibit No. COM-0001 Testimony
    b. Exhibit No. COM-0002 Curriculum Vitae
    c. Exhibit No. COM-0003 18 C.F.R. § 35.18 ARO Schedule
    d. Exhibit No. COM-0004 ARO Annual Rate Impact Schedule

3. Marked tariff sheets (Attachment 1);

4. Clean tariff sheets (Attachment 2).

B. Proposed Effective Date

ComEd respectfully requests that the Commission waive the 60 day notice requirement and accept, without condition or modification, the proposed tariff sheets to be effective May 1, 2025, without suspension or hearing. Consistent with 18 C.F.R. § 35.15, good cause exists to permit the requested effective date because the tariff amendment includes no substantive change and has no impact on rates. If the Commission determines that a May 1, 2025 effective date is unavailable, good cause nonetheless exists to waive notice requirements and grant the earliest possible effective date because the filing does not raise rates, but does serve to clarify rate treatments, which benefits customers.

C. Service of Filing

PJM has served a copy of this filing on all PJM Members and on all state utility regulatory commissions in the PJM Region by posting this filing electronically. In accordance with the Commission's regulations,[21] PJM will post a copy of this filing to the FERC filings section of its internet site, located at the following link:

[21] *See* 18 C.F.R. §§ 35.2(e) and 385.2010(f)(3).

https://www.pjm.com/library/filing-order with a specific link to the newly filed document, and will send an e-mail on the same date as this filing to all PJM Members and all state utility regulatory commissions in the PJM Region[22] alerting them that this filing has been made by PJM and is available by following such link. If the document is not immediately available by using the referenced link, the document will be available through the referenced link within 24 hours of the filing. Also, a copy of this filing will be available on the Commission's eLibrary website located at the following link: https://elibrary.ferc.gov/ in accordance with the Commission's regulations and Order No. 714.

D. Description of Filing

A description of the filing is set forth above.

E. Statement of the Reasons for the Tariff Change

This transmittal letter and enclosed materials explain the reasons for the proposed changes to ComEd's Attachment H-13A.

F. Requisite Agreement

No agreement is required by contract for the filing of proposed changes.

G. Statement Regarding Inclusion of Any Expense or Costs in Cost of Service Statements that Have Been Alleged or Adjudged Illegal, Duplicative, or Unnecessary Costs that are Demonstrably the Product of Discriminatory Employment Practices

There are no costs included in this filing that have been alleged or adjudged in any administrative or judicial proceeding to be illegal, duplicative, or unnecessary costs, nor has any expense or cost been demonstrated to be the product of discriminatory employment practices, within the meaning of Section 35.13(d)(3) of the Commission's regulations.

H. Cost of Service and Revenue Information to Support Filing and Request for Waiver

[22] PJM already maintains, updates, and regularly uses e-mail lists for all PJM members and affected state commissions.

The cost of service, rate design information, and illustrative revenue calculations that support this filing are set forth in the proposed tariff sheets and explained in the accompanying Prepared Direct Testimony of Erin White (Exhibit No. COM-0001). ComEd believes that it has provided sufficient information for the Commission to determine the reasonableness of the proposed changes, which will have no impact on rates. To the extent that this filing requires waivers of Section 35.13 of the Commission's regulations, ComEd respectfully requests such waivers, including waivers of Section 35.13(c), (d), (e), and (h) of the Commission's regulations, 18 C.F.R. §§ 35.13(c), (d), (e), and (h). To the extent that this filing fails to contain any information otherwise required for technical compliance with the Commission's regulations, ComEd respectfully requests that compliance with such regulations be waived.

V. CONCLUSION

WHERFORE, for the foregoing reasons, ComEd respectfully requests the Commission accept its revised Attachment H-13A, effective May 1, 2025.

Respectfully submitted,

/s/ Stan Berman

Stan Berman
Berman and Todderud LLP
3502 Fremont Ave N, #1
Seattle, WA 98103
(206)-279-3193
stan@btlawllp.com

On behalf of Commonwealth Edison Company

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Commonwealth Edison Company	**Docket No. ER25-________**

PREPARED DIRECT TESTIMONY OF

ERIN WHITE

ON BEHALF OF COMMONWEALTH EDISON COMPANY

MAY 1, 2025

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Commonwealth Edison Company	**Docket No. ER24-________**

SUMMARY OF
PREPARED DIRECT TESTIMONY OF
ERIN WHITE ON BEHALF OF
COMMONWEALTH EDISON COMPANY

Ms. White is Director of Accounting at Exelon and testifies as to the accounting treatment of Asset Retirement Obligations ("AROs") and Asset Retirement Costs ("ARCs") that are part of the formula transmission rate of Commonwealth Edison Company ("ComEd") included in the PJM Interconnection, L.L.C. Open Access Transmission Tariff ("Tariff"). She also explains the reason for, and the effect of, the Tariff clarification proposed in this filing related to ARO recovery.

AROs are liabilities arising under law or contract to remediate certain long-held property upon retirement of that property. Such obligations are recognized ordinarily when the assets are placed into service and are carried on the books of a utility as liabilities. ARCs reflect the cost of remediation, discounted to net present value. ARCs are reflected in ComEd's accounting as an asset that offsets the ARO liability and is depreciated throughout the expected useful life of the asset. For accounting purposes, AROs are typically calculated as the present value of future cash flows required to meet the obligation to remediate. Depreciation of the ARC assets and accretion of the ARO liabilities are recorded as expenses for ratemaking. The undepreciated portion of the ARCs is treated in rates as a part of rate base, earning a return like other utility plant.

In 2001, the Financial Accounting Standards Board ("FASB") issued Statement of Financial Accounting Standards (FAS) 143, governing the accounting for AROs. In 2003, ComEd adopted FAS 143, which embodies the ratemaking treatment of AROs that ComEd had followed in prior years. To implement FAS 143, ComEd determined the estimated costs for the future remediation of certain assets, which are discounted to the net present value, and recorded the resulting AROs. ComEd made corresponding journal entries in its books. ComEd's adoption of FAS 143 had no effect on ComEd's recovery related to ARO.

ComEd adopted FIN 47 in 2005, which is a FASB interpretation of FAS 143 that clarified that the retirement of a long-lived asset whose timing and/or method of retirement are conditional on a future event is within the scope of FAS 143. ComEd updated its accounts and its accounting practices to comply with FIN 47.

Since 2007, when the Commission accepted ComEd's formula transmission rate, the PJM Tariff has reflected ComEd's recovery related to AROs. Indeed, that very issue was the subject of a customer protest that was resolved by settlement in the 2007 rate case. Under the Tariff, undepreciated ARC amounts are included in rate base, earning a return, and annual depreciation of the transmission-related ARC is an expense included in the ComEd rate, all of which is clearly set forth in the Tariff. Ms. White sponsors an exhibit showing the current ARO and ARC balances, which she explains in her testimony. She also explains that the ARO amounts are separate from "cost of removal" amounts reflected in ComEd depreciation rates – there is no double recovery.

During recent audit proceedings, the Commission's Audit Staff asserted that the Tariff provisions related to ARO recovery were not in compliance with Commission regulations and a Commission order. To address Staff's concerns, ComEd is making this filing to add a footnote to the Tariff expressly specifying that the Commission reviewed and approved the ARO treatment that has always been in the formula. The change will not have any impact on ComEd's rate levels.

UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION

Commonwealth Edison Company	**Docket No. ER25-________**

DIRECT TESTIMONY OF ERIN WHITE

I. INTRODUCTION

Q. Please state your name and business address.

A. My name is Erin White and my business address is Two Lincoln Centre Oakbrook Terrace, IL 60181.

Q. Please describe your present position and responsibilities.

A. I am employed as Director of Accounting for Commonwealth Edison Company ("ComEd"). As Director of Accounting, I am responsible for ComEd's accounting operations and associated internal controls as well as its external financial reporting requirements and associated filings with the Securities and Exchange Commission, the Federal Energy Regulatory Commission ("FERC" or "Commission"), and the Illinois Commerce Commission ("ICC"). Additionally, I am responsible for accounting research at ComEd, including implementation of new accounting standards. Among my other responsibilities is oversight of ComEd's accounting for Asset Retirement Obligations ("ARO").

Q. What is your background and experience?

A. I graduated from the University of Illinois at Urbana-Champaign in 2004 with a Bachelor of Science in Accountancy. I graduated from the University of Texas at Austin in 2005 with a Master in Professional Accounting degree. I earned a Master of Business Administration from the University of Chicago in 2017. I am a Certified Public Accountant in the State of Illinois and a member of the American Institute of Certified Public Accountants.

I began my career at Deloitte & Touche, LLP in 2005 in the audit practice of Deloitte's Chicago office. Over the next 7 years, my responsibilities increased, I transferred to Deloitte's Phoenix audit practice, I participated in Deloitte's Management Development Program with a rotation to Deloitte's Mergers and Acquisitions Transaction Services group in the Chicago office, and I was promoted to Manager. In 2012, I joined Exelon Corporation ("Exelon"), ComEd's parent, and held various positions in corporate accounting, ComEd accounting, Exelon Generation Nuclear finance, accounting policy and research, Exelon Generation accounting, and external financial reporting. I held roles as Senior, Manager, Senior Manager, and Director. I transferred to my current role as ComEd Director of Accounting in February 2025.

As a result of my training and experience, I have become adept with Generally Accepted Accounting Principles, Statements of the Financial Accounting Standards Board ("FASB"), and the Commission's Uniform System of Accounts ("USofA") set forth in Part 101 of Title 18 of the Code of Federal Regulations. This includes extensive experience applying accounting principles governing ARO.

My Curriculum Vitae is attached as Exhibit No. COM-0002.

Q. What exhibits are you sponsoring?

A. In addition to my testimony, Exhibit No. COM-0001, I am sponsoring the following exhibits:

Exhibit No. COM-0002	Curriculum Vitae
Exhibit No. COM-0003	18 CFR § 35.18(a) and (b) Detailed ARO Schedule
Exhibit No. COM-0004	ARO Rate Impact Schedule

Q. Please briefly describe ComEd's operations.

A. ComEd, an Illinois corporation, is an operating subsidiary of Exelon, a Pennsylvania corporation. ComEd maintains more than 91,000 miles of overhead and underground transmission and distribution facilities in northern Illinois, as well as transmission facilities in Northern Indiana owned by its subsidiary Commonwealth Edison Company of Indiana, Inc. and provides delivered electric power to more than four million customers. ComEd transferred operational control over its transmission facilities to the PJM Interconnection ("PJM") on May 1, 2004. ComEd's retail electric service is regulated by the ICC, while PJM's provision of transmission service over its transmission facilities and its sales for resale of electric energy in interstate commerce are regulated by the Commission.

Q. Please describe the filing at issue in this Proceeding.

A. Pursuant to Section 205 of the Federal Power Act, ComEd has directed PJM to file a revision to the formula transmission rate tariff for transmission service over ComEd's system. The purpose of the filing is to eliminate any controversy that ComEd is in compliance with the Commission's requirements for the recovery through rates of

ComEd's ARO, including compliance with the rules set forth in Order No. 631[1] and 18 C.F.R. § 35.18.

The relevant tariff provisions governing ARO are set forth in PJM Interconnection, L.L.C. Open Access Transmission Tariff ("PJM OATT"), Attachment H-13A ("ComEd Formula Rate"). The rules applicable to calculations of the ComEd Formula Rate are at PJM OATT, Attachment H-13B ("ComEd Formula Rate Protocols").

I note at the outset that the amendment to the ComEd Formula Rate embodied in the PJM OATT tariff submitted today will have no rate impact on transmission customers of PJM. This will be further explained below.

Q. What is the purpose of your testimony?

A. My testimony explains the history and implementation of ComEd's accounting for AROs and how AROs and the associated costs and depreciation impact ComEd's Formula Rate. I also discuss in greater detail the reasons for today's filing.

II. BACKGROUND OF ARO

Q. What is an ARO?

A. Simply stated, an ARO is a legal obligation to remove or remediate long-term assets upon their retirement. The Commission's USofA, C.F.R. Part 101, General Instruction 25(A), states that an ARO:

> represents a liability for the legal obligation associated with the retirement of a tangible long-lived asset that a company is required to settle as a result of an existing or enacted law, statute, ordinance, or written or oral contract

[1] *Accounting, Financial Reporting, and Rate Filing Requirements for Asset Retirement Obligations*, Order No. 631, 103 FERC ¶ 61,021 (2003) ("Order No. 631").

or by legal construction of a contract under the doctrine of promissory estoppel.

Examples of AROs at ComEd include obligations to remove underground storage tanks ("USTs") or abate asbestos—retirement obligations that arise under law. Also included in AROs are obligations under facility leases to restore property to its original condition upon expiration of the lease term.

To satisfy the ARO, utilities reserve a liability amount on their books when the asset is placed into service to cover the ARO when the asset is retired or the obligation otherwise comes into play. ComEd, like other utilities, reserves these amounts through its ARO accounting.

Factors affecting AROs include not only the future cost of removal/remediation, but also the anticipated service life of the facility or equipment for which the ARO exists, inflation rates, and discount rates.

Q. What is ARC?

A. An important component of the accounting for AROs is the "Asset Retirement Cost," referred to as ARC, which is recorded as an asset that offsets the ARO liability. The ARC represents the estimated cost to remove/remediate a long-lived asset, which is discounted to the net present value at the time the liability to remove/remediate the asset is incurred—usually, when the asset is installed. General Instruction 25A of the Commission's USofA supplies the following definition of ARC: "[T]he amount capitalized when the liability is recognized for the long-lived asset that gives rise to the legal obligation."

Q. Please explain the basic concepts of ARO accounting.

A. In a context other than utility ratemaking, AROs would be recorded at fair value—that is, the value someone would accept to take on that liability. For utilities, however, that amount ordinarily would be difficult to ascertain because there is no market for such liabilities. Therefore, AROs are typically calculated as the present value of future cash flows required to meet the obligation. In other words, if in ten years, the utility will face a retirement obligation of $1,000, the ARO analysis asks what periodic payments would be required to meet that obligation and discounts those payments to present value. Accretion expense is then recorded over time increasing the ARO as the related assets gets closer to retirement.

ARCs are the discounted cost of remediating the property. They are capitalized as an increment to the cost of the related long-term asset. The ARC is depreciated over the useful life of the related long-term asset. Expense is recorded for the depreciation of the ARC asset and accretion of the ARO liability over time. The undepreciated portion of the ARC is treated in rates as a part of rate base, earning a return like other utility plant. Annual ARC depreciation expense is treated in the same fashion as plant depreciation, with the annual amount flowing through rates each year as an expense. Ultimately, at end of life of the underlying asset, the recovery of ARC should be sufficient to pay for the actual costs incurred in meeting the retirement obligation (*e.g.*, remediating a UST, abating asbestos, *etc.*).

Q. In basic concepts, how would ARO and ARC be accounted for under the USofA?

A. The accounting rules are spelled out in General Instruction 25 of the USofA, 18 C.F.R. § 101, and ComEd follows the accounting laid out in that instruction. The utility records as a liability the ARO in Account 230. The associated costs are charged to electric utility plant (*e.g.*, Account 101) and nonutility plant as appropriate, relating to the plant that gave rise to the legal obligation. Account 101 (Electric Plant in Service) includes amounts that are more specifically detailed in the 300 accounts – Account 359.1 is specifically the ARC associated with Transmission Plant and Account 399.1 is the ARC associated with General Plant. Over time, accretion expense, depreciation and amortization of the costs are recorded in Accounts 411.10 Accretion Expense and 403.1 Depreciation Expense for Asset Retirement Costs with credits to Accounts 230, 359.1 or 399.1. Adjustments due to measurement changes are also recorded in Accounts 230 and 359.1 or 399.1.

These basic accounting principles are embodied in the FAS issuances I explain below.

III. FAS 143

Q. What is FAS 143?

A. FAS 143 is a Statement of the Financial Accounting Standards Board ("FASB") that addresses financial accounting for AROs. It was issued in 2001 and was implemented by ComEd in 2003. The FASB summarized the Statement as follows: "This Statement requires that the fair value of a liability for an asset retirement obligation be recognized in the period in which it is incurred if a reasonable estimate of fair value can be made. The associated asset retirement costs are capitalized as part of the carrying amount of the long-lived asset."

FAS 143 calls for measuring the ARO at fair value at the time it is to be implemented (*i.e.*, at the time of anticipated retirement), with the liability discounted to present value. In other words, the retirement obligation liability reflects the fair value of the obligation at the balance sheet date. The liability recorded represents an obligation for the future remediation of certain assets and, as a result, accretion expense will be accrued on this liability until such time as the obligation is satisfied. Accretions are based on interest rates and effectively add amounts to the previous value of the reserved amount, so that the full amount of the remediation obligation will be recovered at the time of retirement. Balances in the ARO, ARC and accumulated depreciation accounts must be periodically revised until the remediation costs are incurred.

Q. Has ComEd recovered ARO costs through rates prior to FAS 143?

A. Yes, ComEd has recovered these costs through rates for many years. Prior to 2003, ComEd, like some other utilities, recognized removal and remediation costs as an element of depreciation and accounted for those costs through its depreciation accounts.

ComEd adopted FAS 143 in 2003 and, as a result, modified the way it accounted for removal and remediation costs. At that time, a retirement obligation of approximately $1 million related to the Company's obligation to remediate USTs at the end of their useful lives was recorded.

Q. How did ComEd implement FAS 143?

A. Consistent with FAS 143, ComEd determined fair values of the obligations and recorded liabilities representing obligations for the future remediation of certain assets. It accrues accretion expense on those liabilities until such time as removal and remediation is complete. Additionally, the standard required the capitalization of the associated asset retirement costs and depreciation of those amounts over the remaining lives of the underlying facilities for which the assets were created.

Implementation of FAS 143 required a number of journal entries. At the time of adoption of FAS 143, ComEd's journal entry consisted of the following components:

- Recognition of the present value of the ARO liability;
- Recognition of the ARC asset valued at the date the USTs were installed;
- Depreciation of the ARC asset to present;
- Reversal of removal costs for USTs currently in Accumulated Depreciation; and,
- Establishment of regulatory asset (used for ComEd's internal accounting to compute amortization amounts – the regulatory asset is not reflected in ComEd rates).

Using a base settlement amount (*i.e.,* the cost of removal or remediation), the anticipated year of retirement, and a net discount rate, ComEd calculated the present value of the anticipated ARO liability. Once the ARO liability was determined, this amount was "present valued" back to the date the asset was put in service to determine what the recorded ARC asset should be for that UST. The ARC asset is depreciated on a straight-line basis over the anticipated life of the UST.

Some USTs that were still in use had a retirement date prior to 2003. Those USTs had a fully depreciated ARC asset; the present value of the asset at the time it was incurred was completely depreciated. The liability for these USTs has been, and will continue to be, accreted until taken out of service. The journal entry recorded for these assets consisted of:

- a debit to Plant in Service for ARC for the present value at the time the liability was incurred (in service date);
- a corresponding amount crediting the reserve to fully depreciate the ARC;
- a credit to the ARO liability; and,
- a corresponding amount debiting the regulatory asset for the full amount of the liability.

USTs that had a retirement date after 2003 continued to incur depreciation on the ARC asset and accretion of the ARO liability until the retirement date. The implementation journal entry for those USTs consisted of:

- a debit to Plant in Service for the ARC for the present value at the time the liability was incurred (in-service date);
- straight-line depreciation to depreciate the ARC asset, which resulted in a credit to the reserve to depreciate the ARC asset for the number of years that had elapsed since the in-service date through 2003;
- a credit to the ARO liability for the present value in 2003; and

- a debit to the regulatory asset (again – for internal accounting calculations only) for the difference from the first three bullet points above and which represented to date the depreciation on the ARC asset and the accretion on the ARO liability.

Prior to 2003, ComEd collected removal costs through accumulated depreciation. To implement FAS 143, ComEd reversed from accumulated depreciation accounts the amount of removal costs that had been collected for the USTs. These amounts then were recognized as an offset against the regulatory asset in which the depreciation and amortization were calculated.

Q. Did ComEd's adoption of FAS 143 in 2003 alter its ultimate recovery related to ARO?

A. No. Although the accounting methodology adopted in FAS 143 differs from the depreciation accounting that ComEd applied prior to 2003, the end result is the same. That is, at the end of an asset's life, the two methodologies result in the same credit balance to meet the retirement obligation. The difference is in classification (a liability vs. accumulated depreciation; 100% depreciation v. a combination of depreciation and accretion expense) and the timing of the recognition of expense (straight line depreciation v. an accretion expense over the passage of time.)

IV. FIN 47

Q. Did ComEd further refine its accounting for ARO after implementing FAS 143?

A. Yes. In 2005, ComEd adopted FIN 47. The FASB clarified in FIN 47 that a legal obligation associated with the retirement of a long-lived asset whose timing and/or method of retirement are conditional on a future event is within the scope of FAS 143. FIN 47 requires ComEd to record liabilities associated with its conditional AROs at their estimated fair values if those fair values can be reasonably estimated. This requirement caused ComEd to update an existing inventory, originally created for the adoption of FAS No. 143, to identify assets associated with conditional obligations and to determine which, if any, of the conditional AROs could be reasonably estimated.

Q. Did ComEd identify conditional obligations?

A. Yes. The significant conditional AROs identified by ComEd included abatement and disposal of equipment and buildings contaminated with asbestos and Polychlorinated Biphenyls ("PCBs").

Q. Was ComEd able to estimate the fair value of conditional obligations?

A. Yes. The ability to reasonably estimate a conditional ARO was a matter of management judgment, based upon management's ability to estimate a settlement date or range of settlement dates, a method or potential method of settlement and probabilities associated with the potential dates and methods of settlement of its conditional AROs. In determining whether their conditional AROs could be reasonably estimated, management considered past practices, industry practices, management's intent and the estimated economic lives of the assets. The management of ComEd concluded that all significant conditional AROs could be reasonably estimated.

Q. How did ComEd account for its conditional obligations under FIN 47?

A. The transition provisions of FIN 47 required ComEd to apply the estimations identified in the previous paragraph of my testimony back to the historical periods in which the conditional AROs were incurred, resulting in a remeasurement of these obligations at the latter of the date that the related assets were placed into service or acquired or the date that the applicable law or environmental regulation became effective. The fair values of the conditional AROs were then estimated. The present value of future estimated cash flows was calculated using credit-adjusted, risk-free rates applicable to ComEd in order to determine the fair value of the conditional AROs at the time of adoption of FIN 47.

FIN 47 also required that ComEd recognize the following amounts within its financial statements upon the adoption of FIN 47: (i) a liability for any existing conditional AROs adjusted for cumulative accretion to December 31, 2005; (ii) an ARC capitalized as an increase to the carrying amount of the associated long-lived assets; and (iii) cumulative depreciation on the ARC. The transition guidance in FIN 47 required that its adoption be accomplished through a cumulative change in accounting principle measured as the difference between the amounts recognized in the financial statements prior to the adoption of FIN 47 for conditional AROs and the amounts recognized as of December 31, 2005 pursuant to FIN 47. ComEd recorded an ARO of $150 million, an ARC asset of $5 million, and an adjustment through regulatory accounting of $130 million on its balance sheet. Regarding the regulatory accounting adjustment of $130 million, to track and calculate the amortization, and to reflect prior rate recovery of ARO amounts, for internal purposes ComEd recorded a regulatory asset of $91 million, which represented the difference between amounts collected in rates and amounts recognized in accordance with FIN 47 for those conditional AROs that met the requirements of FAS 71. (FAS 71 addresses general-purpose financial statements for public utilities.) In addition, ComEd's accumulated depreciation already reflected rate recovery for obligations to be recognized in accordance with FIN 47, resulting in a reclassification of cost of removal from a regulatory liability to an ARO liability of $39 million upon the adoption of FIN 47. The $15 million difference between the ARO and offsetting ARC and regulatory balances recorded, was reflected as a pre-tax charge due to a cumulative effect of change in accounting principle within ComEd's income statement.

Q. Please elaborate on the accounting treatment of cost of removal.

A. Historically (before FAS 143/FIN 47) the cost of removal component of ComEd depreciation rates included the estimated cost of dismantling and removing plant from service upon retirement. However, upon adoption of FAS 143/FIN 47, the remediation costs incurred to settle the asset retirement obligation were not included in the cost of removal component of ComEd depreciation rates. Because ARC is applied directly against the ARO liability, post- FAS143/FIN 47 there is no ARC included within accumulated depreciation, cost of removal, ongoing depreciation studies, or current depreciation rates for ComEd.

V. TREATMENT OF ARO IN COMED FORMULA RATES

Q. Do the ARO liabilities appear in the ComEd Formula Rate? Please explain.

A. Yes. ComEd adopted a transmission formula rate in 2007, in Docket No. ER07-583. The filing was set for hearing and settlement procedures, which ultimately resulted in a settlement filed October 5, 2007 in that docket.[2] FERC accepted the settled formula in an order issued January 16, 2008.[3] While there have been a number of modifications to the ComEd Formula Rate over the years, none have changed the ratemaking associated with ARO in the intervening 17 years.

The ComEd Formula Rate, as reflected in the settled formula, captures AROs in two ways. First, the undepreciated ARC amounts each year that relate to transmission plant are treated like other transmission plant and included in rate base, earning a return. Second, annual depreciation of the transmission related ARC is included in the ComEd rate, just as depreciation of other electric plant is reflected in the rate. Additionally, allocated to transmission with a wages and salary allocator, the same treatment applies to general plant related ARC and annual depreciation of the general plant related ARC.

Both the rate base treatment, and the recovery of annual depreciation, have been expressly spelled out in the ComEd Formula Rate since its inception. To understand how it is spelled out, however, one must understand the ComEd formula, which identifies components that will be included in the rate, and then refers to the source data that will be used to do the calculations with references to specific FERC Form 1 page and line numbers. Understanding what is in the rate thus requires review of both the filed Formula Rate and also review of the Form 1, to understand which specific data is referenced and included in each line of the rate. A proper review of the ComEd

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[2] *Commonwealth Edison Co.,* Docket No. ER07-583 (Oct. 7, 2007) (Accession No. 20071011-0032).
[3] *Commonwealth Edison Co.*, 122 FERC ¶ 61,030 (2008).

Formula, in conjunction with the Form 1, leaves no question of the ARO treatment in ComEd's formula.

Q. How is the inclusion of ARC in rate base shown in the ComEd Formula?

A, The ComEd Formula Rate calculates Rate Base at Formula Line 55. It is a formulaic calculation that includes data specified at prior lines. For example, it includes Formula Line 15 (Transmission Plant) and provides that the source of the data is Form 1 "p207.58.g"—in other words, Form 1, page 207, Line 58, column g. A review of Page 207, Line 58, column g of FERC Form 1 is the end-of-year plant balance for Total Transmission Plant and itself reflects the total of lines 48 through 57. Line 57 lists "Asset Retirement Costs for Transmission Plant" and references Account 359.1, where Transmission related ARC is recorded.

The formula also includes Formula Line 19 (General Plant) and provides that the source of the data is Form 1 "p207.99.g" – in other words, Form 1, page 207, Line 99, column g. A review of Page 207, Line 99, column g of FERC Form 1 is the end-of-year plant balance for Total General Plant and itself reflects the total of lines 86 through 95, 97, and 98. Line 98 lists "Asset Retirement Costs for General Plant" and references Account 399.1, where General Plant ARCs are recorded.

Inclusion of ARC amounts in Rate Base is clearly stated, reading the ComEd Formula Rate and Form 1 together, as I have just explained.

Q. How is the inclusion of ARC in the depreciation calculations shown in the ComEd Formula?

A. The ComEd Formula computes depreciation expense at Formula Line 96, which sums up prior lines including Line 86 of the Formula Rate which is “Transmission Depreciation Expense Including Amortization of Limited Term Plant” as well as Line 87 of the Formula Rate which is “General Depreciation Expense Including Amortization of Limited Term Plant”. The filed Formula Rate provides that Formula Line 86 sources its data from “p.336.7.b&c&d”—in other words, FERC Form 1, page 336, Line 7, columns b, c, and d. A review of the Form 1 shows that column (c) on page 336 is Depreciation Expense for Asset Retirement Costs, from account 403.1. The filed Formula Rate provides that Formula Line 87 sources its data from “p.336.10.b&c&d”—in other words, FERC Form 1, page 336, Line 10, columns b, c, and d. Again, review of the Form 1 shows that column (c) on page 336 is Depreciation Expense for Asset Retirement Costs, from account 403.1. That is, the depreciation calculation in the ComEd Formula Rate expressly includes the computed depreciation of the ARC for both Transmission and General Plant.

Q. Are there any other ways that ARC and ARC depreciation factor into the formula rate?

A. Yes. The filed Formula Rate factors in Accumulated Depreciation at Lines 30 (Transmission) and 31 (General Plant). The Formula Rate specifies that these amounts are sourced from the Form 1 at Page 219, from a total calculation that factors in Depreciation Expense for ARC (Form 1, Page 219, Line 4) and the Book Cost of ARC Retired (Form 1, Page 219, Line 18). Additionally, the total plant and total accumulated depreciation figures at Lines 6 and 7 of the Formula Rate, used to calculate plant allocators, are sourced from the total plant and total depreciation figures reported at Form 1 Pages 207 and 219, which (as discussed above) expressly include ARC and ARC Depreciation Expense.

Q. Was ComEd's recovery of ARC (in rate base) and ARC depreciation (in the depreciation calculations) and usage in developing plant allocators approved by FERC?

A. Yes. The line numbering in the originally filed ComEd Formula Rate in Docket No. ER07-583 was slightly different from the final settlement, but ComEd's Formula Rate filing in 2007 included the exact same express ARO cost treatment as described above.[4] An intervenor, the Illinois Municipal Electric Authority, directly challenged ComEd's inclusion of ARO costs in its filing. This can be found at Protest of Illinois Municipal Electric Agency, Docket No. ER07-583, at p. 28 (Apr. 18, 2007) (Accession No. 20070418-5088). The Commission set IMEA's challenges for hearing and settlement procedures. The parties reached a settlement that resulted in no substantive change in the manner by which ComEd recovers its ARO costs through its Formula Rate (but as noted above, the provisions were at different line numbers because of changes elsewhere in the rate). The Commission approved that settlement, which included a waiver of any additional filing obligations for elements in the settlement formula. Because the Commission approved the Formula Rate which included the ARC treatment discussed above, ComEd has followed that treatment in the following years.

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[4] *Commonwealth Edison Co*., Docket No. ER07-583, Section 205 Rate Application, (March 1, 2007) (Accession No. 20070301-0124).

VI. SCHEDULE OF ARO AND ARC BALANCES

Q. What is ComEd's current ARO liability based on the most recently available information?

A. Commission regulations at 18 C.F.R. § 35.18 require utilities that carry ARO on their books to "provide a schedule, as part of the supporting work papers, identifying all cost components related to the asset retirement obligations that are included in the book balances of all accounts reflected in the cost of service computation supporting the proposed rates." That schedule is provided as Exhibit No. COM-0003. Exhibit No. COM-0003 summarizes ComEd's ARO liabilities at the end of fiscal year 2024. AROs are categorized as conditional and not conditional, consistent with the guidance of FIN 47. Consistent with 18 C.F.R. § 35.18, entries for all accounts are broken out to show discrete balances. The total value of ComEd's ARO at the end of 2024 was approximately $169 million.

COM-0003 includes a detail and reconciliation of the ARC and ARO balances as of December 31, 2024 from the PowerPlan fixed asset subledger to the general ledger and the 2024 ComEd IL FERC Form 1. It also includes an illustration of ComEd's recurring journal entries related to ARCs and AROs.

VII. RATE IMPACTS OF ARO INCLUSION IN RATE BASE AND DEPRECIATION

Q. What is the impact of the ARO on zonal transmission rates for ComEd?

A. The cumulative annual impacts to the net zonal revenue requirement for the respective filing years is shown below:

	2023	2024	2025
Impact on Net Zonal Revenue Requirement	$1,421,858	$2,174,744	$2,481,801

Support for these calculations is shown in COM-0004.

I note that these calculations include the impact on the prior year true-up and current year forecast relative to the net zonal revenue requirement that was in effect. Additionally, the 2025 amount is subject to change as ComEd has not yet filed its 2025 Annual Update.

Also, this calculation of the ARO related costs in the rate does not mean that this Section 205 filing changes rates by that amount. As explained above, ComEd has been recovering ARO costs through its formula rate since its inception. This Section 205 filing does not increase that recovery by a penny compared to the formula that has been in effect these past 18 years. Further, as explained above, prior to the accounting changes that called for separate accounting for ARO, these amounts were included in plant balances and depreciation balances of ComEd in different accounts, but hit ComEd's rates in exactly the same way. Factoring in these considerations, this Section 205 filing should be treated as having zero rate impact.

VIII. REASON FOR FILING

Q. Please describe the controversy over ARO cost recovery in ComEd's Formula Rate.

A. ComEd filed its formula transmission rate in 2007. In that Formula Rate it accounted for AROs as required under FAS 143 and FIN 47, and a Commission order approved the settled ComEd Formula Rate that included that rate treatment. AROs have been part of ComEd's Commission-accepted filed rate since 2007.

In Audit Proceedings involving ComEd, FERC Docket No. FA21-5-000, the Commission Audit Staff ("Audit Staff") issued a report asserting that ComEd's initial filing of its Formula Rate failed to comply with the requirements of Order 631 and 18 C.F.R. § 35.18. According to Audit Staff, the ARO treatment in the ComEd Formula Rate is therefore unauthorized. (The Audit Report is included with a Letter from Janel Burdick to E. Glenn Rippie, Docket No FA21-5-000 (July 27, 2023) (attaching Audit Report); see also Letter from Janel Burdick to Veronica Gomez, Docket No. FA21-5-000 (April 21, 2021) (commencing audit).)

Q. Did ComEd secure necessary authorizations to recover ARO liabilities through rates?

A. As discussed above, yes.

Q. **Why is ComEd revising its tariff?**

The purpose of this filing is to eliminate any prospective concern about ComEd's authorization to recover ARO costs through rates. The filing has no impact on transmission customers. The only change being proposed is a new footnote, expressly specifying that the Commission reviewed and approved the ARO treatment that has always been in the formula. ComEd is undertaking this revision to its tariff to avoid future confusion and controversy.

Q. Does this complete your testimony?

A. Yes.

VERIFICATION

I declare under penalty of perjury that the foregoing Declaration is true and correct to the best of my information, knowledge, and belief.

Executed this1st day of May 2025.

Erin V. White

Erin V. White
Director of Accounting
Commonwealth Edison Company

Erin V. White, CPA

EDUCATION

THE UNIVERSITY OF CHICAGO BOOTH SCHOOL OF BUSINESS August 2017
Master of Business Administration with High Honors

THE UNIVERSITY OF TEXAS AT AUSTIN MCCOMBS SCHOOL OF BUSINESS August 2005
Master in Professional Accounting
Dean's Award for Academic Excellence & Sommerfeld Scholar

THE UNIVERSITY OF ILLINOIS AT URBANA-CHAMPAIGN May 2004
Bachelor of Science in Accountancy with High Honors
Minor in Mathematics

EXPERIENCE

EXELON CORPORATION **October 2012 – Present**
Director, Commonwealth Edison Accounting (February 2025 – Present)

- Oversee regulatory, revenue, general, plant, and projects accounting teams
- Ensure the complete, accurate and timely submission of ComEd financial reporting information to the SEC, FERC, and ICC
- Ensure effective internal controls over financial reporting

Director, Accounting Policy & External Financial Reporting (October 2022 – February 2025)

- Ensured the complete, accurate and timely submission of external financial reporting information to the SEC, FERC, and state regulatory agencies
- Ensured effective disclosure controls and effective internal controls over financial reporting
- Interpreted FASB and SEC guidance to determine their impact on financial reporting and accounting policies
- Prepared materials for the Audit and Risk Committee of the Board of Directors

Senior Manager, Corporate Accounting (December 2021 – October 2022)

- Oversaw the Corporate Accounting, Benefits Accounting, and Business Services Company (BSC) Accounting teams
- Led the accounting and reporting for the bifurcation of the benefit plans for separation of Exelon and Constellation in February 2022
- Prepared adjustments and supporting schedules for reporting discontinued operations and the recast of the 2021 10-K with the separation of Exelon and Constellation

Senior Manager, Exelon Generation Accounting (October 2020 – December 2021)

- Oversaw accounting and reporting for Constellation Energy Nuclear Group, LLC (CENG) including standalone and IFRS reporting, performing annual impairment analysis, and presenting to the Audit and Finance Committee of the CENG Board of Directors
- Accounted for the purchase of EDF's 49.99% interest in CENG by Exelon Generation in August 2021
- Oversaw Plant Accounting for Exelon Generation and Exelon Corporate, including capital versus expense determinations, and the bifurcation of corporate assets for the separation of Exelon and Constellation
- Oversaw Exelon Generation Corporate Accounting including reviewing monthly and quarterly consolidated flux analyses

Senior Manager, Accounting Policy & Research (June 2018 – October 2020)

- Led the company-wide accounting issues resolution process, including researching, documenting and communicating technical accounting and presentation matters both internally and with external auditors
- Led the preparation and review of materials for Audit Committee and Accounting & Disclosure Governance Committee meetings
- Oversaw the evaluation and implementation of new accounting pronouncements such as ASC 326, *Financial Instruments – Credit Losses*
- Oversaw the valuation of the consolidated pension and OPEB obligations
- Drafted and reviewed footnotes and schedules for the quarterly and annual reports filed with the SEC

Manager, Exelon Nuclear Financial Planning & Analysis (September 2016 – June 2018)
- Managed the development of the five-year forecast
- Developed and reviewed monthly budgets
- Prepared and reported on monthly, year-to-date, and full year variance analyses to senior executives

Manager, Commonwealth Edison General Accounting (April 2015 – August 2016)
- Managed the monthly close and consolidation process across the accounting and finance teams
- Performed annual impairment assessment for goodwill
- Managed annual environmental and incurred but not reported studies for liabilities
- Reviewed journal entries, forecasts, policies, and memos while providing training and mentoring to the team

Manager, Corporate Accounting (June 2014 – April 2015)
Senior Accountant, Corporate Accounting (October 2012 – June 2014)
- Worked with finance and accounting teams across multiple operating companies to manage the monthly close and consolidation process
- Researched and implemented proper accounting treatment for company-wide stock-based compensation grants; documented the treatment in detailed technical memos and executive presentations
- Developed and maintained the budget and five-year forecast for stock-based compensation for the consolidated company and for the Controller's group expenses
- Developed company-wide accounting policy to standardize the accounting for workers' compensation insurance; instructed individuals on the implementation of the new policy at each operating unit of the company
- Drafted and reviewed footnotes and schedules for the quarterly and annual reports filed with the SEC and managed the company's relationship with the external auditors to ensure accurate and timely reporting

DELOITTE **September 2005 – October 2012**
Manager, Merger & Acquisition Transaction Services, Chicago, IL (March 2011 – October 2012)
- Advised Fortune 500 consumer products company in a divestiture; led in the preparation of carve-out financial statements and footnotes in accordance with IFRS
- Provided buy-side due diligence services to strategic and financial clients, including quality of earnings and working capital analyses, identification of debt and debt-like items, and post-close purchase accounting concerns

Manager, External Audit, Phoenix, AZ (November 2006 – March 2011)
Staff, External Audit, Chicago, IL (September 2005 – October 2006)
- Provided primary supervision on audit teams, developing the audit strategy and budget, examining client financial records and systems of internal control, and acting as client liaison
- Engaged in a variety of assurance services including annual financial statement audits, quarterly reviews, Sarbanes-Oxley compliance testing, and agreed upon procedures while working with diverse engagement teams of various sizes

ATTACHMENT 1

MARKED TARIFF SHEETS

PJM TARIFF ATTACHMENT H-13A

Attachment H-13A

Commonwealth Edison Company

Formula Rate -- Appendix A		Notes	FERC Form 1 Page # or Instruction		Year
Shaded cells are input cells					
Allocators					
	Wages & Salary Allocation Factor				
1	Transmission Wages Expense		p354.21.b		
2	Total Wages Expense		p354.28.b		
3	Less A&G Wages Expense		p354.27.b		
4	Total Wages Less A&G Wages Expense		(Line 2 - Line 3)		
5	**Wages & Salary Allocator**		(Line 1 / Line 4)		%
	Plant Allocation Factors				
6	Electric Plant in Service	(Note B)	p207.104.g		
7	Accumulated Depreciation (Total Electric Plant)	(Note J)	p219.29.c		
8	Accumulated Amortization	(Note A)	p200.21.c		
9	Total Accumulated Depreciation		(Line 7 + 8)		
10	Net Plant		(Line 6 - Line 9)		
11	Transmission Gross Plant		(Line 29 - Line 28)		
12	**Gross Plant Allocator**		(Line 11 / Line 6)		%
13	Transmission Net Plant		(Line 41 - Line 28)		
14	**Net Plant Allocator**		(Line 13 / Line 10)		%
Plant Calculations					
	Plant In Service	(Note X)			
15	Transmission Plant In Service	(Note B)	p207.58.g		
16	For Reconciliation only - remove New Transmission Plant Additions for Current Calendar Year	For Reconciliation Only	Attachment 6		
17	New Transmission Plant Additions for Current Calendar Year (weighted by months in service)	(Note B)	Attachment 6		
18	**Total Transmission Plant**		(Line 15 - Line 16 + Line 17)		
19	General		p207.99.g		
20	Intangible		p205.5.g		
21	Total General and Intangible Plant		(Line 19 + Line 20)		
22	Less: General Plant Account 397 -- Communications		p207.94.g		
23	General and Intangible Excluding Acct. 397		(Line 21 - Line 22)		
24	Wage & Salary Allocator		(Line 5)		%
25	General and Intangible Plant Allocated to Transmission		(Line 23 * Line 24)		
26	Account No. 397 Directly Assigned to Transmission		Attachment 5		
27	**Total General and Intangible Functionalized to Transmission**		(Line 25 + Line 26)		
28	**Plant Held for Future Use (Including Land)**	(Note C)	Attachment 5		
29	**Total Plant In Rate Base**		**(Line 18 + Line 27 + Line 28)**		
	Accumulated Depreciation	(Note X)			
30	Transmission Accumulated Depreciation	(Note J)	p219.25.c		
31	Accumulated General Depreciation	(Note J)	p219.28.c		
32	Less: Amount of General Depreciation Associated with Acct. 397	(Note J)	Attachment 5		
33	Balance of Accumulated General Depreciation		(Line 31 - Line 32)		
34	Accumulated Amortization		(Line 8)		
35	Accumulated General and Intangible Depreciation Ex. Acct. 397		(Line 33 + 34)		
36	Wage & Salary Allocator		(Line 5)		%
37	Subtotal General and Intangible Accum. Depreciation Allocated to Transmission		(Line 35 * Line 36)		
38	Percent of Acct. 397 Directly Assigned to Transmission		(Line 26 / Line 22)		%
39	Amount of Gen. Depr. Associated with Acct. 397 Directly Assigned to Trans.		(Line 38 * Line 32)		
40	**Total Accumulated Depreciation**		**(Sum Lines 30, 37 & 39)**		
41	**Total Net Property, Plant & Equipment**		**(Line 29 - Line 40)**		

Adjustment To Rate Base

	Accumulated Deferred Income Taxes			
42a	Account No. 190 (ADIT)	(Note V)	Attachment 1A - ADIT, Line 1	
42b	Account No. 281 (ADIT - Accel. Amort)	(Note V)	Attachment 1A - ADIT, Line 2	
42c	Account No. 282 (ADIT - Other Property)	(Note V)	Attachment 1A - ADIT, Line 3	
42d	Account No. 283 (ADIT - Other)	(Note V)	Attachment 1A - ADIT, Line 4	
42e	Account No. 255 (Accum. Deferred Investment Tax Credits)	(Note U)	Attachment 1A - ADIT	
42f	Accumulated Deferred Income Taxes Allocated To Transmission		Line 42a + 42b + 42c + 42d + 42e	
	Unamortized Deficient / (Excess) ADIT			
42g	Unamortized Deficient / (Excess) ADIT (Federal)	(Note W)	Attachment 1B - ADIT Amortization	
42h	Unamortized Deficient / (Excess) ADIT (State)	(Note W)	Attachment 1B - ADIT Amortization	
42i	Unamortized Deficient / (Excess) ADIT Allocated to Transmission		Line 42g + 42h	
42j	Adjusted Accumulated Deferred Income Taxes Allocated To Transmission		Line 42f + 42i	
	CWIP for Incentive Transmission Projects			
43	CWIP Balances for Current Rate Year	(Note H)	Attachment 6	
	Prepayments			
44	Prepayments (excluding Prepaid Pension Asset)	(Note A)	Attachment 5	
	Materials and Supplies			
45	Undistributed Stores Expense	(Note A)	p227.6.c & 16.c	
46	Wage & Salary Allocator		(Line 5)	%
47	Total Undistributed Stores Expense Allocated to Transmission		(Line 45 * Line 46)	
48	Transmission Materials & Supplies	(Note T)	(p227.8.c + p227.5.c)	
49	**Total Materials & Supplies Allocated to Transmission**		(Line 47 + Line 48)	
	Cash Working Capital			
50	Operation & Maintenance Expense (excluding Interest Only Return on Prepaid Pension Asset)		(Line 85 - Line 84)	
51	1/8th Rule		1/8	12.5%
52	**Total Cash Working Capital Allocated to Transmission**		(Line 50 * Line 51)	
	Network Credits			
53	Outstanding Network Credits	(Note N)	Attachment 5	
54	**Total Adjustment to Rate Base**		(Lines 42j + 43 + 44 + 49 + 52 - 53)	
55	**Rate Base**		(Line 41 + Line 54)	

Operations & Maintenance Expense

	Transmission O&M			
56	Transmission O&M		Attachment 5	
57	Less Account 565		Attachment 5	
58	Plus Transmission Revenue Requirement of Commonwealth Edison of Indiana booked to Account 565		Attachment 5	
59	Plus Schedule 12 Charges billed to Transmission Owner and booked to Account 565	(Note O)	PJM Data	
60	Plus Transmission Lease Payments	(Note A)	p200.4.c	
61	**Transmission O&M**		(Lines 56 - 57 + 58 + 59 + 60)	
	Allocated Administrative & General Expenses			
62	Total A&G		Attachment 5	
63	Plus: Fixed PBOP expense	(Note J)	fixed	7,818,071
64	Less: Actual PBOP expense		Attachment 5	
65	Less: Salaries and Benefits of specified Exelon Corp top executives		Attachment 5	
66	Less: Power Procurement Expense		Attachment 5	
67	Less Property Insurance Account 924		p323.185.b	
68	Less Regulatory Commission Exp Account 928	(Note E)	p323.189.b	
69	Less General Advertising Exp Account 930.1		p323.191.b	
70	Less EPRI Dues	(Note D)	p352 & 353	
71	**Administrative & General Expenses**		Sum (Lines 62 to 63) - Sum (Lines 64 to 70)	
72	Wage & Salary Allocator		(Line 5)	%
73	**Administrative & General Expenses Allocated to Transmission**		(Line 71 * Line 72)	
	Directly Assigned A&G			
74	Regulatory Commission Exp Account 928	(Note G)	Attachment 5	
75	General Advertising Exp Account 930.1	(Note K)	Attachment 5	
76	Subtotal - Accounts 928 and 930.1 - Transmission Related		(Line 74 + Line 75)	

77	Property Insurance Account 924			(Line 67)	
78	General Advertising Exp Account 930.1		(Note F)	Attachment 5	
79	Total Accounts 928 and 930.1 - General			(Line 77 + Line 78)	
80	Net Plant Allocator			(Line 14)	%
81	**A&G Directly Assigned to Transmission**			(Line 79 * Line 80)	
	Interest on Prepaid Pension Asset				
82	Prepaid Pension Asset (net of associated ADIT)			Attachment 5	
83	LTD Cost Rate			(Line 120)	%
84	**Interest on Prepaid Pension Asset**			(Line 82 * Line 83)	
85	**Total Transmission O&M and Interest on Prepaid Pension Asset**			**(Lines 61 + 73 + 76 + 81 + 84)**	
	Depreciation & Amortization Expense				
	Depreciation Expense		(Note X)		
86	Transmission Depreciation Expense Including Amortization of Limited Term Plant		(Note J)	p336.7.b&c&d	
87	General Depreciation Expense Including Amortization of Limited Term Plant		(Notes J)	p336.10.b&c&d	
88	Amount of General Depreciation Expense Associated with Acct. 397		(Note J)	Attachment 5	
89	Balance of General Depreciation Expense			(Line 87 - Line 88)	
90	Intangible Amortization		(Note A)	p336.1.d&e	
91	Total			(Line 89 + Line 90)	
92	Wage & Salary Allocator			(Line 5)	%
93	General Depreciation & Intangible Amortization Allocated to Transmission			(Line 91 * Line 92)	
94	General Depreciation Expense for Acct. 397 Directly Assigned to Transmission			(Line 88 * Line 38)	
95	**General Depreciation and Intangible Amortization Functionalized to Transmission**			(Line 93 + Line 94)	
96	**Total Transmission Depreciation & Amortization**			**(Lines 86 + 95)**	
	Taxes Other than Income Taxes				
97	**Taxes Other than Income Taxes**			Attachment 2	
98	**Total Taxes Other than Income Taxes**			**(Line 97)**	
	Return \ Capitalization Calculations				
	Long Term Interest				
99	Long Term Interest			Attachment 5	
100	Less LTD Interest on Securitization Bonds		(Note P)	Attachment 8	
101	**Long Term Interest**			(Line 99 - Line 100)	
102	**Preferred Dividends**		enter positive	p118.29.c	
	Common Stock				
103	Proprietary Capital			p112.16.c	
104	Less Accumulated Other Comprehensive Income Account 219			p112.15.c	
105	Less Preferred Stock			(Line 114)	
106	Less Account 216.1			p112.12.c	
107	**Common Stock**			(Line 103 - 104 - 105 - 106)	
	Capitalization				
108	Long Term Debt			p112.18 through 21.c	
109	Less Loss on Reacquired Debt			p111.81.c	
110	Plus Gain on Reacquired Debt			p113.61.c	
111	Less ADIT associated with Gain or Loss			Attachment 1A - ADIT, Line 6	
112	Less LTD on Securitization Bonds		(Note P)	Attachment 8	
113	Total Long Term Debt			(Line 108 - 109 + 110 - 111 - 112)	
114	Preferred Stock			p112.3.c	
115	Common Stock			(Line 107)	
116	**Total Capitalization**			(Sum Lines 113 to 115)	
117	Debt %	Total Long Term Debt	(Note Q)	(Line 113 / Line 116)	%
118	Preferred %	Preferred Stock		(Line 114 / Line 116)	%
119	Common %	Common Stock	(Note Q)	(Line 115 / Line 116)	%
120	Debt Cost	Total Long Term Debt		(Line 101 / Line 113)	

121	Preferred Cost	Preferred Stock		(Line 102 / Line 114)		
122	Common Cost	Common Stock	**(Note J)**	Fixed		11.50%
123	Weighted Cost of Debt	Total Long Term Debt (WCLTD)		(Line 117 * Line 120)		
124	Weighted Cost of Preferred	Preferred Stock		(Line 118 * Line 121)		
125	Weighted Cost of Common	Common Stock		(Line 119 * Line 122)		
126	**Rate of Return on Rate Base (ROR)**			(Sum Lines 123 to 125)		
127	**Investment Return = Rate Base * Rate of Return**			**(Line 55 * Line 126)**		

Composite Income Taxes						
	Income Tax Rates					
128		FIT=Federal Income Tax Rate		(Note I)		
129		SIT=State Income Tax Rate or Composite		(Note I)		
130		p	(percent of federal income tax deductible for state purposes)		Per State Tax Code	%
131		T	T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =			%
132a		T / (1-T)				%
132b		Tax Gross-Up Factor	1*1/(1-T)			
	ITC Adjustment			(Note U)		
133		Investment Tax Credit Amortization		enter negative	Attachment 1A - ADIT	
134		Tax Gross-Up Factor			(Line 132b)	%
135		Net Plant Allocation Factor			(Line 14)	%
136		**ITC Adjustment Allocated to Transmission**			(Line 133 * Line 134 * Line 135)	
	Other Income Tax Adjustment					
136a		Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense		**(Note R)**	Attachment 5, Line 136a	
136b		Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component		**(Note R)**	Attachment 5, Line 136b	%
136c		Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component		**(Note R)**	Attachment 5, Line 136c	
136d		Amortization of Other Flow-Through Items - Transmission Component		**(Note R)**	Attachment 5, Line 136d	
136e		Other Income Tax Adjustments - Expense / (Benefit)			Line 136a + 136b + 136c + 136d	
136f		Tax Gross-Up Factor			–(Line 132b)	
136g		Other Income Tax Adjustment			Line 136e*136f	
137	**Income Tax Component =**		(T/1-T) * Investment Return * (1-(WCLTD/ROR)) =		[Line 132a * Line 127 * (1- (Line 123 / Line 126))]	
138	**Total Income Taxes**				**(Line 136 + Line 136g + Line 137)**	
Revenue Requirement						
	Summary					
139		Net Property, Plant & Equipment			(Line 41)	
140		Total Adjustment to Rate Base			(Line 54)	
141		**Rate Base**			(Line 55)	
142		Total Transmission O&M			(Line 85)	
143		Total Transmission Depreciation & Amortization			(Line 96)	
143A		Abandoned Plant Recovery Associated with Superconductor Cable Development Project		(Note S)		
144		Taxes Other than Income			(Line 98)	
145		Investment Return			(Line 127)	
146		Income Taxes			(Line 138)	
147		**Gross Revenue Requirement**			**(Sum Lines 142 to 146)**	
	Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities					
148		Transmission Plant In Service			(Line 15)	
149		Excluded Transmission Facilities		(Note M)	Attachment 5	
150		Included Transmission Facilities			(Line 148 - Line 149)	
151		Inclusion Ratio			(Line 150 / Line 148)	
152		Gross Revenue Requirement			(Line 147)	
153		**Adjusted Gross Revenue Requirement**			(Line 151 * Line 152)	
	Revenue Credits & Interest on Network Credits					
154		**Revenue Credits**			Attachment 3	
155		**Interest on Network Credits**		(Note N)	Attachment 5	
156		**Net Revenue Requirement**			**(Line 153 - Line 154 + Line 155)**	
	Net Plant Carrying Charge					
157		Gross Revenue Requirement			(Line 152)	
158		Net Transmission Plant			(Line 15 - Line 30)	
159		Net Plant Carrying Charge			(Line 157 / Line 158)	
160		Net Plant Carrying Charge without Depreciation			(Line 157 - Line 86) / Line 158	
161		Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes			(Line 157 - Line 86 - Line 127 - Line 138) / Line 158	
	Net Plant Carrying Charge Calculation per 100 Basis Point increase in ROE					
162		Gross Revenue Requirement Less Return and Taxes			(Line 152 - Line 145 - Line 146)	
163		Increased Return and Taxes			Attachment 4	
164		Net Revenue Requirement per 100 Basis Point increase in ROE			(Line 162 + Line 163)	
165		Net Transmission Plant			(Line 15 - Line 30)	
166		Net Plant Carrying Charge per 100 Basis Point increase in ROE			(Line 164 / Line 165)	

167		Net Plant Carrying Charge per 100 Basis Point in ROE without Depreciation			(Line 164 - Line 86) / Line 165		
168		**Net Revenue Requirement**			(Line 156)		
169		True-up amount			Attachment 6		
170		Plus any increased ROE calculated on Attachment 7 other than PJM Sch. 12 projects not paid by other PJM transmission			Attachment 7		
171		Facility Credits under Section 30.9 of the PJM OATT			Attachment 5		
172		**Net Zonal Revenue Requirement**			(Line 168 + 169 + 170 + 171)		
	Network Zonal Service Rate						
173		1 CP Peak		(Note L)	PJM Data		
174		Rate ($/MW-Year)			(Line 172 / 173)		
175		**Network Service Rate ($/MW/Year)**		**(Note ZZ)**	**(Line 174)**		**$**

Notes

A Electric portion only

B Line 16, for the Reconciliation, includes New Transmission Plant that was actually placed in service weighted by the number of months it was actually in service
Line 17 includes New Transmission Plant to be placed in service in the current calendar year that is not included in the PJM regional Transmission Plan (RTEP)
(time-weighted) as shown on Attachment 6. Transmission plant includes any in-service portion of
the plant associated with Phase 1 and 2 of the Superconductor Cable Development Project.

C Includes Transmission portion only. At each annual informational filing, Company will identify for each parcel of land an intended use within a 15 year period.

D Includes all EPRI Annual Membership Dues

E Includes all Regulatory Commission Expenses

F Includes Safety related advertising included in Account 930.1

G Includes Regulatory Commission Expenses directly related to transmission service, RTO filings, or transmission siting itemized in Form 1 at 351.h.

H CWIP can only be included if authorized by the Commission. In Docket No. ER14-1708, ComEd requested permission to recover in rate base up to 100% of CWIP associated with the Grand Prairie Project. All such amounts to be included in rate base will be recorded in Attachment 6. As directed by the Order granting ComEd's request, 147 FERC ¶ 61,141, P 26 (2014), and as documented in ComEd's June 27, 2014 compliance filing, for CWIP amounts that ComEd places in rate base through Attachment 6, ComEd will perform manual adjustments to the account balances in Account 107 to manually exclude non-invoiced expenditures, suspended or disputed invoices, and contract retentions and will impose a 60 day delay so that the amounts are added to rate base after they are to be paid.

I The currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes".
If the utility includes taxes in more than one state, it must explain in Attachment 5 the name of each state and how the blended or composite SIT was developed.

J ROE will be supported in the original filing and no change in ROE will be made absent a filing at FERC.
PBOP expense is fixed until changed as the result of a filing at FERC.
Depreciation rates shown in Attachment 9 are fixed until changed as the result of a filing at FERC.
If book depreciation rates are different than the Attachment 9 rates, ComEd will provide workpapers at the annual update to reconcile formula
depreciation expense and depreciation accruals to Form No. 1 amounts.

K Education and outreach expenses relating to transmission, for example siting or billing

L As provided for in Section 34.1 of the PJM OATT; the PJM established billing determinants will not be revised or updated in the annual rate reconciliations.

M Amount of transmission plant excluded from rates per Attachment 5.

N Outstanding Network Credits is the balance of Network Facilities Upgrades Credits due Transmission Customers who have made lump-sum payments
towards the construction of Network Transmission Facilities consistent with Paragraph 657 of Order 2003-A.
Interest on the Network Credits as booked each year is added to the revenue requirement to make the Transmission Owner whole on Line 155.

O Payments made under Schedule 12 of the PJM OATT that are not directly assessed to load in the Zone under Schedule 12 are included
in Transmission O&M on Line 56. If they are booked to Acct 565, they are included on Line 59.

P Securitization bonds may be included in the capital structure.

Q Equity and debt ratios will be the ratios determined by the actual capital structure and the specified calculation processes of the formula, except that if during the period May 1, 2007 through May 31, 2009 the formula produces an equity ratio exceeding 58.0%, the formulaic value at Line 119 shall be manually set to 58.0% and the formulaic value at Line 117 shall be manually set to 42.0% less the percentage shown at Line 118.
If, during the period June 1, 2009 through May 31, 2010, the formula produces an equity ratio exceeding 57.0%, the formulaic value at Line 119 shall be manually set to 57% and the value at Line 117 shall be manually set to 43.0% less the percentage shown at Line 118.
If, during the period June 1, 2010 through May 31, 2011, the formula produces an equity ratio exceeding 56.0%, the formulaic value at Line 119 shall be manually set to 56% and the value at Line 117 shall be manually set to 44.0% less the percentage shown at Line 118.
If, during any period following May 31, 2011, the formula produces an equity ratio exceeding 55.0%, the formulaic value at Line 119 shall be manually set to 55.0% and the formulaic value at Line 117 shall be manually set to 45.0% less the percentage shown at Line 118.

R See Attachment 5 - Cost Support, section entitled "Other Income Tax Adjustment" for additional information.

S ComEd is authorized to track costs associated with the Phase 1 and 2 of the Superconductor Cable Development Project, but will recover such costs only after a future Section 205 filing in the event all or a portion of the project is abandoned, at no fault of ComEd, either before or after the Project goes into service.

T Only the transmission portion of amounts reported at Form 1, page 227, line 5 is used. The transmission portion of line 5 is specified in a footnote to the Form 1, page 227.

U Commonwealth Edison Company elected to amortize investment tax credits against recoverable income tax expense, rather than to reduce rate base by unamortized investment tax credit.
Amortization reduces income tax expense and reduces the revenue requirement by the amount of the Investment Tax Credit Amortization multiplied by (1/(1-T)).

V The Accumulated Deferred Income Tax (ADIT) balances in Accounts 190, 281, 282, and 283 are measured using the enacted tax rate that is expected to apply when the underlying temporary differences are expected to be settled or realized. See Attachment 1A - ADIT for additional information.

W These balances represent the unamortized federal and state deficient / (excess) deferred income taxes. See Attachment 1B - ADIT Amortization for additional information.

X Plant and depreciation values include ARO amounts and associated depreciation consistent with ComEd Form 1. ComEd has submitted the requisite support for such recovery as provided in 18 C.F.R. § 35.18.

ZZ The revisions made in the Order No. 864 Cleanup Filing will not require any adjustment to rates, or annual update filings, for rates charged and annual update filings made prior to the date of the order accepting the revised tariff sheets.

Commonwealth Edison Company
Accumulated Deferred Income Taxes (ADIT)
Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

Line	ADIT	Total	Gas, Production, Distribution, or Other Related	Only Transmission Related	Plant Related	Labor Related	
1	ADIT-190						Total entered in Appendix A, Line 42a
2	ADIT-281						Total entered in Appendix A, Line 42b
3	ADIT-282						Total entered in Appendix A, Line 42c
4	ADIT-283						Total entered in Appendix A Line 42d
5	**Subtotal - Transmission ADIT**						

Line	Description	Total
6	ADIT (Reacquired Debt)	

Note: ADIT associated with Gain or Loss on Reacquired Debt included in ADIT-283, Column A is excluded from rate base and instead included in Cost of Debt on Attachment H-13A, Line 111. A deferred tax (liability) should be reported as a positive balance and a deferred tax asset should be reported as a negative balance on Attachment H-13A, Line 111.

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B - F and each separate ADIT item will be listed, dissimilar items with amounts exceeding $100,000 will be listed separately.

(A) ADIT-190		(B) Total	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification

Subtotal: ADIT-190 (FERC Form)								
Less: ASC 740 ADIT Adjustments excluded from rate base			-	-	-	-	-	
Less: ASC 740 ADIT Adjustments related to unamortized ITC			-	-	-	-		
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)			-	-	-	-	-	
Less: OPEB related ADIT, Above if not separately removed			-	-	-	-	-	
Total: ADIT-190								
Wages & Salary Allocator								
Net Plant Allocator								
Transmission Allocator								
Other Allocator								
ADIT - Transmission								

Instructions for Account 190:
1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C
2. ADIT items related only to Transmission are directly assigned to Column D
3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the

formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

(A) ADIT- 282		(B) Total	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission	(E) Plant	(F) Labor	(G) Justification
Subtotal: ADIT-282 (FERC Form)							
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to AFUDC Equity							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-282							
Wages & Salary Allocator							
Net Plant Allocator							
Transmission Allocator							
Other Allocator							
ADIT - Transmission							

Instructions for Account 282:

1. **ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C**
2. **ADIT items related only to Transmission are directly assigned to Column D**
3. **ADIT items related to Plant and not in Columns C & D are included in Column E**

4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

(A) ADIT-283		(B) Total	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification

Subtotal: ADIT-283 (FERC Form)							
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to unamortized ITC							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-283							
Wages & Salary Allocator							
Net Plant Allocator							
Transmission Allocator							
Other Allocator							
ADIT - Transmission							

Instructions for Account 283:

1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C

2. ADIT items related only to Transmission are directly assigned to Column D
3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

ADITC-255

				Unamortized ITC Balance	**Current Year Amortization**
1	Rate Base Treatment				
2	Account No. 255 (Accum. Deferred Investment Tax Credits)		To Appendix A, Line 42e		
3	Amortization				
4	Investment Tax Credit Amortization		To Appendix A, Line 133		
5	Total				
6	Form No. 1 balance (p.266) for amortization				
7	Difference /1				

/1 Difference must be zero

END

Commonwealth Edison Company
Deficient / Excess Deferred Income Taxes
Attachment 1B - Deficient / Excess Deferred Income Tax Amortization Worksheet

Federal Deficient / (Excess) Deferred Income Taxes

Tax Cuts and Jobs Act of 2017

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) December 31, 2017 ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
1	**Unprotected Non-Property**							
2	ADIT - 190	(Note A)	410.1	4 Years	$			$ -
3	ADIT - 281	(Note A)	411.1	4 Years	-			-
4	ADIT - 282	(Note A)	411.1	4 Years	-			-
5	ADIT - 283	(Note A)	411.1	4 Years				-
6	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
7	**Unprotected Property**							
8	ADIT - 190	(Note A)	410.1	Average Life	$ -			$ -
9	ADIT - 281	(Note A)	411.1	Average Life	-			-
10	ADIT - 282	(Note A)	411.1	Average Life				-
11	ADIT - 283	(Note A)	411.1	Average Life	-			-
12	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
13	**Protected Property**							
14	ADIT - 190	(Note A)	410.1	ARAM	$			-
15	ADIT - 281	(Note A)	411.1	ARAM	-			-
16	ADIT - 282	(Note A)	411.1	ARAM				-
17	ADIT - 283	(Note A)	411.1	ARAM	-			-
18	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
19	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Tax Reform Act of 1986

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) September 30, 2018 ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
20	**Protected Property**							
21	ADIT - 190	(Note B)	410.1	ARAM	$ -			$ -
22	ADIT - 281	(Note B)	411.1	ARAM	-			-
23	ADIT - 282	(Note B)	411.1	ARAM				-
24	ADIT - 283	(Note B)	411.1	ARAM	-			-
25	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
26	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Total Federal Deficient / (Excess) Deferred Income Taxes

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D)	(E) ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
27	ADIT - 190		410.1		$			$ -
28	ADIT - 281		411.1		-			-
29	ADIT - 282		411.1					-
30	ADIT - 283		411.1					-
31	**Total - Deficient / (Excess) ADIT**	Col. H entered in Appendix A, Line 42g			$	$ -	$ -	$ -
32	Tax Gross-Up Factor	Appendix A, Line 132b			1.0000	1.0000	1.0000	1.0000
33	**Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Federal Income Tax Regulatory Asset / (Liability)

Line	(A) Regulatory Assets / (Liabilities)	(B) Notes	(C)	(D)	(E) ADIT Deficient / (Excess)	(F) Blended Dates BOY Balance	(G) Current Year Amortization	(H) December 31, 2018 EOY Balance
34	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
35	Account 254 (Other Regulatory Liabilities)					-	-	-
36	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

State Deficient / (Excess) Deferred Income Taxes

Illinois (2017 Corporate Rate Change)

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) ADIT Deficient / (Excess)	(F) September 30, 2018 BOY Balance	(G) Current Year Amortization	(H) December 31, 2018 EOY Balance
37	**Unprotected Non-Property**							
38	ADIT - 190	(Note C)	410.1	4 Years	$			$ -
39	ADIT - 281	(Note C)	411.1	4 Years	-			-
40	ADIT - 282	(Note C)	411.1	4 Years	-			-
41	ADIT - 283	(Note C)	411.1	4 Years				-
42	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
43	**Unprotected Property**							
44	ADIT - 190	(Note C)	410.1	Average Life	$ -			$ -
45	ADIT - 281	(Note C)	411.1	Average Life	-			-
46	ADIT - 282	(Note C)	411.1	Average Life				-
47	ADIT - 283	(Note C)	411.1	Average Life	-			-
48	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
49	**Protected Property**							
50	ADIT - 190	(Note C)	410.1	NA	$ -			-
51	ADIT - 281	(Note C)	411.1	NA	-			-
52	ADIT - 282	(Note C)	411.1	NA	-			-
53	ADIT - 283	(Note C)	411.1	NA	-			-
54	**Subtotal - Deficient / (Excess) ADIT**				$ -	$ -	$ -	$ -
55	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Illinois (2011 Corporate Rate Change)

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
56	**Unprotected Non-Property**							

57	ADIT - 190	(Note D)	410.1	4 Years	$			$ -
58	ADIT - 281	(Note D)	411.1	4 Years	-			-
59	ADIT - 282	(Note D)	411.1	4 Years	-			-
60	ADIT - 283	(Note D)	411.1	4 Years				-
61	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
62	**Unprotected Property**							
63	ADIT - 190	(Note D)	410.1	Average Life	$ -			$ -
64	ADIT - 281	(Note D)	411.1	Average Life	-			-
65	ADIT - 282	(Note D)	411.1	Average Life				-
66	ADIT - 283	(Note D)	411.1	Average Life	-			-
67	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
68	**Protected Property**							
69	ADIT - 190	(Note D)	410.1	NA	$ -	-	-	-
70	ADIT - 281	(Note D)	411.1	NA	-	-	-	-
71	ADIT - 282	(Note D)	411.1	NA	-	-	-	-
72	ADIT - 283	(Note D)	411.1	NA	-	-	-	-
73	**Subtotal - Deficient / (Excess) ADIT**				$ -	$ -	$ -	$ -
74	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Total State Deficient / (Excess) Deferred Income Taxes

Line	**(A)** **Deficient / (Excess) Deferred Income Taxes**	**(B)** Notes	**(C)** FERC Account ADIT Deficient / (Excess) Amortization	**(D)**	**(E)** ADIT Deficient / (Excess)	**(F)** BOY Balance	**(G)** Current Year Amortization	**(H)** EOY Balance
75	ADIT - 190				$	$ -	$ -	$ -
76	ADIT - 281		410.1		-	-	-	-
77	ADIT - 282		411.1			-	-	-
78	ADIT - 283		411.1			-	-	-
79	**Total - Deficient / (Excess) ADIT**	Col. H entered in Appendix A, Line 42h			$	$ -	$ -	$ -
80	Tax Gross-Up Factor	Appendix A, Line 132b			1.0000	1.0000	1.0000	1.0000
81	**Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

State Income Tax Regulatory Asset / (Liability)

Line	Regulatory Assets / (Liabilities) (A)	Notes (B)	(C)	(D)	ADIT Deficient / (Excess) (E)	BOY Balance (F)	Current Year Amortization (G)	EOY Balance (H)
82	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
83	Account 254 (Other Regulatory Liabilities)					-	-	-
84	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Federal and State Income Tax Regulatory Asset / (Liability)

Federal and State Income Tax Regulatory Asset / (Liability) related to Deficient / (Excess) Deferred Income Taxes

Line	Regulatory Assets / (Liabilities) (A)	Notes (B)	(C)	(D)	ADIT Deficient / (Excess) (E)	BOY Balance (F)	Current Year Amortization (G)	EOY Balance (H)
85	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
86	Account 254 (Other Regulatory Liabilities)					-	-	-
87	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Instructions

1. For transmission allocated deficient / (excess) accumulated deferred income taxes (ADIT) related to rate change(s) to income tax rates occurring after September 30, 2018, insert new amortization table(s) that delineates the deficient and (excess) ADIT by category (i.e., protected property, unprotected property, and unprotected non-property).

2. Set the amortization period for unprotected property to the average remaining book life and unprotected non-property to 4 years. The amortization of deficient and excess ADIT designated as protected will be calculated using the Average Rate Assumption Method (ARAM) or a manner that complies with the normalization requirements.

3. Update applicable formulas in the "Total Federal Deficient / (Excess) Deferred Income Taxes" and "Total State Deficient / (Excess) Deferred Income Taxes" sections to ensure appropriate inclusion of deficient / (excess) ADIT balances related to rate changes occurring after September 30, 2018.

4. Insert note explaining the event giving rise to the deficient / (excess) ADIT including the start and end date for the amortization. The amortization ceases after the related regulatory asset / liability is drawn down to zero.

Notes

A Deficient and (excess) ADIT related to the Tax Cuts and Jobs Act of 2017 (TCJA) will be amortized beginning January 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments, amendments to income tax returns, or new IRS guidance. The amortization of protected property related deficient and (excess) ADIT will be calculated using the Average Rate Assumption Method (ARAM) or a manner that complies with the normalization requirements and may vary by year depending on where each underlying asset resides in its individual life cycle. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underyling asset resides in its individual life cycle. The unprotected non-property related deficient and (excess) ADIT will be fully amortized by December 31, 2021. Note - The amortization formula in Column F will change based on where ComEd resides in the amortization cycle. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.

B The remaining unamortized deficient and (excess) ADIT related to the Tax Reform Act of 1986 will be amortized using the Average Rate Assumption Method (ARAM) as provided in the Settlement in Docket No. ER19-5 et al. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.

C The remaining unamortized deficient and (excess) ADIT related to the Illinois "Corporate Rate Increase of 2017" as of September 30, 2018 will be amortized beginning October 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments or tax return amendments. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underlying asset resides in its individual life cycle. The unprotected non-property related excess and deficient ADIT will be fully amortized by September 30, 2022. The unamortized deficient and (excess) state related ADIT including related amortization is reported net of federal taxes. Note - The amortization formula in Column G will change based on where ComEd resides in the amortization cycle. The current year amortization of excess and deficient deferred income taxes is recorded in FERC Accounts 410.1 and 411.1.

D The remaining unamortized deficient and (excess) ADIT related to the Illinois "Corporate Rate Increase of 2011" as of September 30, 2018 will be amortized beginning October 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments or tax return amendments. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underlying asset resides in its individual life cycle. The unprotected non-property related excess and deficient ADIT will be fully amortized by September 30, 2022. The unamortized deficient and (excess) state related ADIT including related amortization is reported net of federal taxes. Note - The amortization formula in Column G will change based on where ComEd resides in the amortization cycle. The current year amortization of excess and deficient deferred income taxes is recorded in FERC Accounts 410.1 and 411.1.

Commonwealth Edison Company Accumulated Deferred Income Taxes Remeasurement Attachment 1C - Deficient / Excess Deferred Income Taxes Worksheet

Tax Cuts and Jobs Act of 2017

Line	Detailed Description	Description	Category	ADIT - Pre Rate Change (December 31, 2017) Federal Gross Timing Difference	Federal ADIT @ 35%	State ADIT	FIT on SIT	Total ADIT	ADIT - Post Rate Change (December 31, 2017) Federal Gross Timing Difference	Federal ADIT @ 21%	State ADIT	FIT on SIT	Total ADIT	Deficient / (Excess) Deferred Income Taxes (December 31, 2017) Rate Change Deferred Tax Impact	Non-Recoverable	Income Tax Regulatory Asset / Liability Deferred Taxes	Deficient / (Excess) ADIT Balance	Jurisdiction Allocator	Electric Transmission	Allocator (Note B)	Transmission Allocated	FERC Account
	(A)	(B)	(C)	(D)	(E) = (D) * 35%	(F)	(G) = (F) * 35%	(H) = (E) + (F) + (G)	(I)	(J) = (I) * 21%	(K)	(L) = (K) * 21%	(M) = (J) + (K) + (L)	(N) = (H) - (M)	(O)	(P)	(Q) = (N) - (O) - (P)	(R)	(S)	(T)	(U) = (Q) * (T)	(V)
	FERC Account 190 - Non-Current (Note A)																					
1	Accrued Holiday	Accrued Holiday	Unprotected Non-Property															Labor	Yes	13.61 %		190
2	Accrued Legal	Accrued Legal	Unprotected Non-															Labor	No	0.00%		190

			Property											
3	Accrued Vacation	Accrued Vacation	Unprotected Non-Property							Labor	Yes	13.61 %		190
4	Charitable Contributions	Charitable Contributions	Unprotected Non-Property							Excluded	No	0.00%		190
5	CPS Energy Efficiency Fund	CPS Energy Efficiency Fund	Unprotected Non-Property							Excluded	No	0.00%		190
6	Damage to Company Property	Damage to Company Property	Unprotected Non-Property							Plant	Yes	23.34 %		190
7	Deferred Gain - Like Kind Exchange	Deferred Gain - Like Kind Exchange	Unprotected Non-Property							Excluded	No	0.00%		190
8	Deferred Gain - Like Kind Exchange	Deferred Gain - Like Kind Exchange	Unprotected Non-Property							Excluded	No	0.00%		190
9	Deferred Rental Expense	Deferred Rental Expense	Unprotected Non-Property							Labor	Yes	13.61 %		190
10	Deferred Rental Expense	Deferred Rental Expense	Unprotected Non-Property							Labor	Yes	13.61 %		190
11	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Unprotected Non-Property							100% Distribution	No	0.00%		190
12	Environmental Cleanup Costs - Non-MGP (Mfg Gas	Environmental Cleanup Costs - Non-MGP (Mfg Gas	Unprotected Non-Property							100% Distribution	No	0.00%		190

	Plants)	Plants)					
13	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Unprotected Non-Property	100% Distribution	No	0.00%	190
14	Executive Uninsured Death Benefits after Retirement	Executive Uninsured Death Benefits after Retirement	Unprotected Non-Property	Labor	Yes	13.61 %	190
15	Incentive Compensation Deferred Stock Bonus Plan	Incentive Compensation Deferred Stock Bonus Plan	Unprotected Non-Property	Labor	Yes	13.61 %	190
16	Incentive Compensation Plan	Incentive Compensation Plan	Unprotected Non-Property	Labor	Yes	13.61 %	190
17	Interest on Projected Tax Settlements	Interest on Projected Tax Settlements	Unprotected Non-Property	Excluded	No	0.00%	190
18	Interest on Projected Tax Settlements	Interest on Projected Tax Settlements	Unprotected Non-Property	Excluded	No	0.00%	190
19	Liability for Severance Plans	Liability for Severance Plans	Unprotected Non-Property	Labor	Yes	13.61 %	190
20	Long-Term Debt - Revaluation of Discount	Long-Term Debt - Revaluation of Discount	Unprotected Non-Property	Excluded	No	0.00%	190
21	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-	Labor	Yes	13.61 %	190

			Property									
22	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-Property						Labor	Yes	13.61%	190
23	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-Property						Excluded	No	0.00%	190
24	Management Deferred Compensation Plan	Management Deferred Compensation Plan	Unprotected Non-Property						Labor	Yes	13.61%	190
25	Manufactured Gas Plants - Provision	Manufactured Gas Plants - Provision	Unprotected Non-Property						Excluded	No	0.00%	190
26	Merger Costs	Merger Costs	Unprotected Non-Property						Excluded	No	0.00%	190
27	Midwest Generation Settlement Asset	Midwest Generation Settlement Asset	Unprotected Non-Property						Excluded	No	0.00%	190
28	Obsolete Materials	Obsolete Materials	Unprotected Non-Property						Plant	Yes	23.34%	190
29	Other Accrued Expenses	Other Accrued Expenses	Unprotected Non-Property						Excluded	No	0.00%	190
30	Other Current	Other Current	Unprotected Non-Property						Excluded	No	0.00%	190
31	Other Current	Other Non Current	Unprotected Non-Property						Labor	Yes	13.61%	190
32	Partnerships	Partnerships	Unprotected Non-						Excluded	No	0.00%	190

			Property											
33	Partnerships	Partnerships	Unprotected Non-Property							Excluded	No	0.00%		190
34	Partnerships	Partnerships	Unprotected Non-Property							Excluded	No	0.00%		190
35	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-Property							Labor	No	0.00%		190
36	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-Property							Labor	No	0.00%		190
37	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-Property							Labor	No	0.00%		190
38	Provision for Bad Debt	Provision for Bad Debt	Unprotected Non-Property							Revenue	Yes	0.00%		190
39	Public Utility Fund Contribution	Public Utility Fund Contribution	Unprotected Non-Property							Excluded	No	0.00%		190
40	Regulatory (Asset)/Liab: Transmission	Regulatory (Asset)/Liab: Transmission	Unprotected Non-Property							Excluded	No	0.00%		190
41	Revenue Subject to Refund	Revenue Subject to Refund	Unprotected Non-Property							Excluded	No	0.00%		190
42	Stock Options; Other Equity Based Compensation	Stock Options; Other Equity Based Compensation	Unprotected Non-Property							Labor	Yes	13.61%		190
43	Stock	Stock								Labor	Yes	13.61		190

	Options; Other Equity Based Compensation	Options; Other Equity Based Compensation	Unprotected Non-Property												%		
44	Stock Options; Other Equity Based Compensation	Stock Options; Other Equity Based Compensation	Unprotected Non-Property										Labor	Yes	13.61 %		190
45	Supplemental Employee Retirement Plan	Supplemental Employee Retirement Plan	Unprotected Non-Property										Labor	Yes	13.61 %		190
46	Taxes Other Than Income Taxes	Taxes Other Than Income Taxes	Unprotected Non-Property										Plant	Yes	23.34 %		190
47	Use Tax Adjustment	Use Tax Adjustment	Unprotected Non-Property										Plant	Yes	23.34 %		190
48	Use Tax Adjustment	Use Tax Adjustment	Unprotected Non-Property										Plant	Yes	23.34 %		190
49	Workers Compensation and Public Claims Reserve	Workers Compensation and Public Claims Reserve	Unprotected Non-Property										Labor	Yes	13.61 %		190
50	Federal NOL	Federal NOL	Protected Property										Plant	Yes	23.34 %		190
51	Federal NOL	Federal NOL	Protected Property										Excluded	No	0.00%		190
52	Gross Up Reclass	Gross Up Reclass	N/A										N/A	No	0.00%		190
53	FAS 109 - TCJA	FAS 109 - TCJA	N/A										N/A	No	0.00%		190
	Total FERC Account																

	190						
	FERC Account 282 - Property (Note A)						
54	Protected Property (PowerTax)	Protected Property (PowerTax)	Protected Property	Plant	Yes	23.34 %	282
55	Non-Protected Property (PowerTax) - Plant	Non-Protected Property (PowerTax)	Unprotected Property	Plant	Yes	23.34 %	282
56	Non-Protected Property (PowerTax) - Transmission	Non-Protected Property (PowerTax)	Unprotected Property	100% Transmission	Yes	100.00%	282
57	Non-Protected Property (PowerTax) - Distribution	Non-Protected Property (PowerTax)	Unprotected Property	100% Distribution	No	0.00%	282
58	Gross Up Reclass	Gross Up Reclass	N/A	N/A	No	0.00%	282
59	FAS 109 - TCJA	FAS 109 - TCJA	N/A	N/A	No	0.00%	282
60	FIN 48 & Other Adjustment	FIN 48 & Other Adjustment	N/A	N/A	No	0.00%	282
	Total FERC Account 282						
	FERC Account 283 - Non-Current (Note A)						
61	Accelerated Depr AMI -	Accelerated Depr AMI -	Unprotected Non-	100% Distribution	No	0.00%	283

	Related to Reg Assets	Related to Reg Assets	Property				
62	Accrued Benefits	Accrued Benefits	Unprotected Non-Property	Labor	Yes	13.61 %	283
63	Loss on Reacquired Debt	Loss on Reacquired Debt	Unprotected Non-Property	Plant	No	0.00%	283
64	Regulatory (Asset)/Liab: AMP - Other Costs	Regulatory (Asset)/Liab: AMP - Other Costs	Unprotected Non-Property	Excluded	No	0.00%	283
65	Regulatory (Asset)/Liab: AMP - retired meters and AMI costs	Regulatory (Asset)/Liab: AMP - retired meters and AMI costs	Unprotected Non-Property	100% Distribution	No	0.00%	283
66	Deferred Gain - Sale of Easement	Deferred Gain - Sale of Easement	Unprotected Non-Property	Plant	Yes	23.34 %	283
67	Deferred Revenue - Fiber Optics Lease	Deferred Revenue - Fiber Optics Lease	Unprotected Non-Property	Communication	No	0.00%	283
68	Equity Earnings in Uncon Sub	Equity Earnings in Uncon Sub	Unprotected Non-Property	Excluded	No	0.00%	283
69	Regulatory (Asset)/Liab: Energy Efficiency	Regulatory (Asset)/Liab: Energy Efficiency	Unprotected Non-Property	Excluded	No	0.00%	283
70	Regulatory (Asset)/Liab: MGP-	Regulatory (Asset)/Liab: MGP-	Unprotected Non-Property	Excluded	No	0.00%	283

	Environmental Remediation	Environmental Remediation					
71	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property	Labor	Yes	13.61%	283
72	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property	Labor	Yes	13.61%	283
73	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property	Labor	Yes	13.61%	283
74	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property	Labor	Yes	13.61%	283
75	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Unprotected Non-Property	Excluded	No	0.00%	283
76	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Unprotected Non-Property	Excluded	No	0.00%	283
77	Reg Asset - Capital Leases	Reg Asset - Capital Leases	Unprotected Non-Property	Excluded	No	0.00%	283
78	Regulatory (Asset)/Liab:	Regulatory (Asset)/Liab:	Unprotected Non-Property	100% Distribution	No	0.00%	283

	Distribution: Other Deferred (A-Base)	Distribution: Other Deferred (A-Base)					
79	Regulatory (Asset)/Liab: Distribution: Other Deferred (Merger)	Regulatory (Asset)/Liab: Distribution: Other Deferred (Merger)	Unprotected Non-Property	100% Distribution	No	0.00%	283
80	Regulatory (Asset)/Liab: Distribution: Other Deferred (Storm)	Regulatory (Asset)/Liab: Distribution: Other Deferred (Storm)	Unprotected Non-Property	100% Distribution	No	0.00%	283
81	Regulatory (Asset)/Liab: Distribution Formula Rate	Regulatory (Asset)/Liab: Distribution Formula Rate	Unprotected Non-Property	Excluded	No	0.00%	283
82	Regulatory (Asset)/Liab: Distribution Formula Rate	Regulatory (Asset)/Liab: Distribution Formula Rate	Unprotected Non-Property	Excluded	No	0.00%	283
83	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Unprotected Non-Property	Excluded	No	0.00%	283
84	Regulatory (Asset)/Liab: Rider UF	Regulatory (Asset)/Liab: Rider UF	Unprotected Non-Property	Excluded	No	0.00%	283
85				Excluded	No	0.00%	283

	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Unprotected Non-Property				
86	Chicago Arbitration Settlement	Chicago Arbitration Settlement	Unprotected Non-Property	Excluded	No	0.00%	283
87	Incentive Compensation Capitalized (Global Settlement)	Incentive Compensation Capitalized (Global Settlement)	Unprotected Non-Property	100% Distribution	No	0.00%	283
88	Midwest Generation Settlement Liab	Midwest Generation Settlement Liab	Unprotected Non-Property	Excluded	No	0.00%	283
89	FIT on SIT	FIT on SIT	Unprotected Non-Property	Excluded	No	0.00%	283
90	Swap and Hedging Transactions	Swap and Hedging Transactions	Unprotected Non-Property	Plant	Yes	23.34%	283
91	Swap and Hedging Transactions	Swap and Hedging Transactions	Unprotected Non-Property	Plant	Yes	23.34%	283
92	ITC Def Tax	ITC Def Tax	N/A	N/A	No	0.00%	283
93	FAS 109 - Regulatory Asset Electric	FAS 109 - Regulatory Asset Electric	N/A	N/A	No	0.00%	283
94	SFAS109 - Regulatory Liability Electric	SFAS109 - Regulatory Liability Electric	N/A	N/A	No	0.00%	283
95	Gross Up Reclass	Gross Up Reclass	N/A	N/A	No	0.00%	283

96	FAS 109 - TCJA	FAS 109 - TCJA	N/A										N/A	No	0.00%		283
	Total FERC Account 283																
97	**Grand Total**																
										Protected Property							
										Unprotected Property							
										Unprotected Non-Property							
										Total Unprotected							
										Total (Excess) / Deficient ADIT							

Instructions

1. In accordance with ASC 740, deferred tax assets and liabilities are adjusted (re-measured) for the effect of the changes in tax law (including tax rates) in the period that the change is enacted. Adjustments are recorded in the appropriate deferred income tax balance sheet accounts (Accounts 190, 281, 282 and 283) based on the nature of the temporary difference and the related classification requirements of the accounts. If as a

result of action or expected action by a regulator, it is probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, a regulatory asset or liability is recognized in Account 182.3 (Other Regulatory Assets), or Account 254 (Other Regulatory Liabilities), as appropriate, for that probable future revenue or reduction in future revenue. The amortization of deficient and excess deferred income taxes that will be recovered from or passed through to customers through future rates will be recorded in FERC Accounts 410.1 (Provision for Deferred Income Taxes, Utility Operating Income) and 411.1 (Provision for Deferred Income Taxes—Credit, Utility Operating Income), as appropriate. Re-measurements of deferred tax balance sheet accounts may also result in re-measurements of tax-related regulatory assets or liabilities that had been recorded prior to the change in tax law. If it is not probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, tax expense will be recognized in Account 410.2 (Provision for Deferred Income Taxes, Other Income or Deductions) or tax benefit is recognized in Account 411.2 (Provision for Deferred Income Taxes-

Credit, Other Income or Deductions), as appropriate.
2. For deficient and (excess) accumulated deferred income taxes (ADIT) related to change(s) to income tax rates occurring after September 30, 2018, insert calculations that support the re-measurement amount delineated by categroy (i.e., protected property, unprotected property, and unprotected non-property).
3. Set the allocation percentages equal to the applicable percentages at the date of the rate change.

Notes

A Categorization of items as protected or non-protected will remain as originally agreed, absent a change in guidance from the Internal Revenue Service (IRS) with respect to that items. Balances associated with the tax rate change will not be adjusted (except for amortization each year) absent audit adjustments, tax return amendments, or a change in IRS guidance. Any resulting changes will be prominently disclosed including the basis for the change.

B The allocation percentage in Column T are based on the

applicable
percentages at the
date of the rate
change and must
remain fixed absent
the Commission's
express approval.

END

Commonwealth Edison Company

Attachment 2 - Taxes Other Than Income Worksheet

			Page 263		**Allocated**
Other Taxes			**Col (i)**	**Allocator**	**Amount**
	Plant Related			**Net Plant Allocator**	
1		Real Estate			
2		Illinois Use Tax on Purchases			
3		Vehicle Use			
4		State Franchise Tax			
5		Chicago Use			
6		Chicago Transaction			
7		Chicago Dark Fiber Rev. Tax			
8	**Total Plant Related**			%	
	Labor Related			**Wages & Salary Allocator**	
9		Unemployment & state unemployment			
10		FICA			
11		City of Chicago			
12					
13					
14	**Total Labor Related**			%	
	Other Included			**Net Plant Allocator**	
15					
16					
17					
18					
19	**Total Other Included**			%	
20	**Total Included (Lines 8 + 14 + 19)**				
	Currently Excluded				
21		Electricity Excise Tax			
22		Rider 21 Low Income Assistance			
23		Rider 21 Renewable			
24		Electricity Distribution			
25		Infrastructure Tax			

26		Municipal Utility				
27		Public Utility Fund				
28		**Subtotal, Excluded**				
29	**Total, Included and Excluded (Line 20 + Line 28)**					
30	**Total Other Taxes from p114.14.c**					
31		Difference (Line 29 - Line 30)		-		
	<u>Criteria for Allocation:</u>					
	A	Other taxes that are incurred through ownership of plant including transmission plant will be allocated based on the Gross Plant				
		Allocator. If the taxes are 100% recovered at retail they shall not be included.				
	B	Other taxes that are incurred through ownership of only general or intangible plant will be allocated based on the Wages and Salary				
		Allocator. If the taxes are 100% recovered at retail they shall not be included.				
	C	Other taxes that are assessed based on labor will be allocated based on the Wages and Salary Allocator.				
	D	Other taxes except as provided for in A, B and C above, that are incurred and (1) are not fully recovered at retail or (2) are				
		directly or indirectly related to transmission service will be allocated based on the Gross Plant Allocator; provided, however, that				
		overheads shall be treated as in footnote B above.				
	E	Excludes prior period adjustments in the first year of the formula's operation and reconciliation for the first year.				

	Commonwealth Edison Company		
	Attachment 3 - Revenue Credit Workpaper		
	Accounts 450 & 451		
1	Late Payment Penalties Allocated to Transmission		
	Account 454 - Rent from Electric Property		
2	Rent from Electric Property - Transmission Related		
	Account 456 - Other Electric Revenues (Note 1)		
3	Transmission for Others (Note 3)		
4	Schedule 1A		
5	Net revenues associated with Network Integration Transmission Service (NITS) for which the load is not included in the divisor (difference between NITS credits from PJM and PJM NITS charges paid by Transmission Owner) (Note 3)		
6	Point to Point Service revenues for which the load is not included in the divisor received by Transmission Owner		-
7	PJM Transitional Revenue Neutrality (Note 1)		
8	PJM Transitional Market Expansion (Note 1)		
9	Professional Services		-
10	Revenues from Directly Assigned Transmission Facility Charges (Note 2)		
11	Rent or Attachment Fees associated with Transmission Facilities		-
12	Gross Revenue Credits	(Sum Lines 1-11)	-
13	Amount offset from Note 3 below		
14	Total Account 454 and 456		
15	Note 1: All revenues related to transmission that are received as a transmission owner (i.e., not received as a LSE), for which the cost of the service is recovered under this formula, except as specifically provided for elsewhere in this Attachment or elsewhere in the formula will be included as a revenue credit or included in the peak on line 174 of Appendix A.		
16	Note 2: If the costs associated with the Directly Assigned Transmission Facility Charges are included in the Rates, the associated revenues are included in the Rates. If the costs associated with the Directly Assigned Transmission Facility Charges are not included in the Rates, the associated revenues are not included in the Rates.		
17	Note 3: If the facilities associated with the revenues are not included in the formula, the revenue is shown here, but not included in the total above and explained in the Cost Support. For example revenues associated with distribution facilities. In addition Revenues from Schedule 12 are not included in the total above to the extent they are credited under Schedule 12.		

Commonwealth Edison Company
Attachment 4 – Calculation of 100 Basis Point Increase in ROE

	Return and Taxes with 100 Basis Point increase in ROE			
A	100 Basis Point increase in ROE and Income Taxes		Line 30 + Line 42 from below	
B	100 Basis Point increase in ROE			1.00%
Return Calculation				
			Appendix A Line or Source Reference	
1	**Rate Base**		(Line 41 + Line 54)	
	Long Term Interest			
2	Long Term Interest		Attachment 5	
3	Less LTD Interest on Securitization Bonds		Attachment 8	
4	Long Term Interest		(Line 99 - Line 100)	
5	**Preferred Dividends**	enter positive	p118.29.c	
	Common Stock			
6	Proprietary Capital		p112.16.c	
7	Less Accumulated Other Comprehensive Income Account 219		p112.15.c	
8	Less Preferred Stock		(Line 114)	
9	Less Account 216.1		p112.12.c	
10	Common Stock		(Line 103 - 104 - 105 - 106)	
	Capitalization			
11	Long Term Debt		p112.18-21.c	
12	Less Loss on Reacquired Debt		p111.81.c	
13	Plus Gain on Reacquired Debt		p113.61.c	
14	Less ADIT associated with Gain or Loss		Attachment 1	
15	Less LTD on Securitization Bonds		Attachment 8	
16	Total Long Term Debt		(Line 108 - 109 + 110 - 111 - 112)	
17	Preferred Stock		p112.3.c	
18	Common Stock		(Line 107)	
19	Total Capitalization		(Sum Lines 113 to 115)	
20	Debt %	Total Long Term Debt	(Line 113 / Line 116)	%
21	Preferred %	Preferred Stock	(Line 114 / Line 116)	%
22	Common %	Common Stock	(Line 115 / Line 116)	%
23	Debt Cost	Total Long Term Debt	(Line 101 / Line 113)	
24	Preferred Cost	Preferred Stock	(Line 102 / Line 114)	
25	Common Cost	Common Stock	(Line 122 + 100 basis points)	12.5%
26	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 117 * Line 120)	
27	Weighted Cost of Preferred	Preferred Stock	(Line 118 * Line 121)	

28		Weighted Cost of Common		Common Stock	(Line 119 * Line 122)		
29		**Rate of Return on Rate Base (ROR)**			**(Sum Lines 123 to 125)**		
30		**Investment Return = Rate Base * Rate of Return**			**(Line 55 * Line 126)**		
Composite Income Taxes							
		Income Tax Rates					
31		FIT=Federal Income Tax Rate		(Note I from Appendix A)			%
32		SIT=State Income Tax Rate or Composite		(Note I from Appendix A)			%
33		p = percent of federal income tax deductible for state purposes			Per State Tax Code		%
34		T		T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =			%
35		CIT = T / (1-T)					%
36		Tax Gross-Up Factor	1 / (1-T)				
		ITC Adjustment		(Note U from Appendix A)			
37		Investment Tax Credit Amortization		enter negative	Attachment 1A - ADIT		-
38		Tax Gross-Up Factor			(Line 36)		%
39		Net Plant Allocation Factor			(Line 14)		%
40		**ITC Adjustment Allocated to Transmission**			(Line 37 * 38 * 39)		
		Other Income Tax Adjustment					
41		Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense		(Note R from Appendix A)	Attachment 5, Line 136a		
42		Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component		(Note R from Appendix A)	Attachment 5, Line 136b		
43		Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component		(Note R from Appendix A)	Attachment 5, Line 136c		
44		Amortization of Other Flow-Through Items - Transmission Component		(Note R from Appendix A)	Attachment 5, Line 136d		
45		Other Income Tax Adjustments - Expense / (Benefit)			Line 41 + 42 + 43 + 44		
46		1Tax Gross-Up Factor			Line 36		%
47		Other Income Tax Adjustment			Line 136e*136f		
41		**Income Tax Component =**	CIT=(T/1-T) * Investment Return * (1-(WCLTD/R)) =		[Line 35 * Line 30 * (1- (Line 26 / Line 29))]		
42		**Total Income Taxes**			**(Line 40 +Line 47 + Line 48)**		-

Commonwealth Edison Company
Attachment 5 - Cost Support

Electric / Non-electric Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Electric Portion		Details
	Plant Allocation Factors						
8	Accumulated Amortization	(Note A)	p200.21.c				
	General Plant Direct Assignment of Account 397				DA to Trans.		
26	Account No. 397 Directly Assigned to Transmission		**p207.94.g**				Assignment based on locational analysis performed pursuant to protocol 1.g.iii.7.v and detailed in Attachment accompanying Annual Update Filing.
	Accumulated Depreciation and Amortization						
32	Less: Amount of General Depreciation Associated with Acct. 397		P219.28c (footnote)				
	Materials and Supplies						
45	Undistributed Stores Expense	(Note A)	p227.6.c & 15.c				
	Allocated General & Common Expenses						
60	Plus Transmission Lease Payments	(Note A)	p200.4.c				
	Depreciation Expense						
88	Amount of General Depreciation Expense Associated with Acct. 397		**p337.43.b*e**				Acct. 397 Depreciable Plant Balance times Depreciation Rate

Transmission / Non-transmission Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Transmission Related	Non-transmission Related	Details
28	**Plant Held for Future Use (Including Land)**	(Note C)	p.214				
							Note: At each annual update, company will provide for each parcel of land a description of its intended use within a 15 year period.

CWIP & Expensed Lease Worksheet

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	CWIP In Form 1 Amount	Expensed Lease in Form 1 Amount	Details
	Plant Allocation Factors						
6	Electric Plant in Service	(Note	p207.104.g				

			B)					
	Plant In Service							
15	Transmission Plant In Service		(Note B)	p207.58.g				
	Accumulated Depreciation							
30	Transmission Accumulated Depreciation		(Note J)	p219.25.c				

EPRI Dues Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	EPRI Dues		Details
	Allocated General & Common Expenses							
70	Less EPRI Dues		(Note D)	p352 & 353				

Adjustments to A & G Expense

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions			Total	Adjustment	Adjusted Total	Details
	Allocated General & Common Expenses					
62	Total A&G	**p.323.197.b**				Adjust to remove lobbying expense, if any.
63	Fixed PBOP expense	Company Records	7,818,071			
64	Actual PBOP expense	p.320.198.b (footnote)				Current year actual PBOP expense
65	Salaries and Benefits of specified Exelon Corp top executives	Company Records				Elective adjustment to certain payroll and benefit costs of Exelon Corp's senior executive team.
66	Power Procurement Expense	p.320.198.b (footnote)				

Regulatory Expense Related to Transmission Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Transmission Related	Non-transmission Related	Details
	Directly Assigned A&G							
74	Regulatory Commission Exp Account 928		(Note G)	**p350-351.h**				Transmission-related = all FERC dockets per p.350-351, excl. FERC annual charge. Includes allocated portion of regulatory costs for issuing debt.

Safety Related Advertising Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Safety Related	Non-safety Related	Details
	Directly Assigned A&G							
78	General Advertising Exp Account 930.1		(Note F)	p323.191.b			-	

MultiState Workpaper

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					State 1	State 2	State 3	State 4	State 5	Details
	Income Tax Rates									
					IL					
129	SIT=State Income Tax Rate or Composite		(Note I)							

Education and Out Reach Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Education & Outreach	Other	Details
	Directly Assigned A&G							
75	General Advertising Exp Account 930.1		(Note K)	p323.191.b	-		-	-

Excluded Plant Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Excluded Transmission Facilities	Description of the Facilities
	Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities						
149		Excluded Transmission Facilities		(Note M)			General Description of the Facilities
		Instructions:				Enter $	
	1	Remove all investment below 69 kV or generator step up transformers included in transmission plant in service that are not a result of the RTEP Process					
	2	If unable to determine the investment below 69kV in a substation with investment of 69 kV and higher as well as below 69 kV,				Or	
		the following formula will be used:	Example			Enter $	
	A	Total investment in substation	1,000,000				
	B	Identifiable investment in Transmission (provide workpapers)	500,000				
	C	Identifiable investment in Distribution (provide workpapers)	400,000				
	D	Amount to be excluded (A x (C / (B + C)))	444,444				
							Add more lines if necessary

Prepayments and Prepaid Pension Asset

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Description of the Prepayments
44	Prepayments			W&S Allocator		
		Prepayments	-	0.000%	-	FERC Form 1 – **p111.57.c**
82	Prepaid Pension Asset					
		Prepaid Pension Asset (not to be included in Prepayments)	-			Stockholder contributed portion iss shown on FERC Form 1 - p233.25.f Note: Attachment 1 excludes from transmission rate base the associated ADIT balance.
		Less ADIT	-			
		Net Prepaid Pension Asset	-	0.000%	-	

Outstanding Network Credits Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Outstanding Network Credits	Description of the Credits			
	Network Credits					**Enter $**				
53		Outstanding Network Credits			(Note N)					
							Total			
							Add more lines if necessary			

Adjustments to Transmission O&M

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Total	LSE Adjustment	Transmission Related	Details
56		Transmission O&M			**p321.112.b**			0	Acct. 566 adjusted, and Accts. 561.4 and 561.8 included to remove PJM LSE expenses not recoverable in ComEd's OATT rate.
									See FERC Form 1, footnote to p320.97b.
57		Less Account 565			**p321.96.b**		0	0	Transmission related 565 is to include the TX revenue requirement of ComEd of Indiana

Interest Expense Adjustment

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Long Term Interest per Form 1	Amortization related to Interest Rate Swaps*	Total Long Term Interest	Details
	Adjustment to Amortize Losses Associated with Interest Rate Swaps								
99		Long Term Interest			**p117.62-67.c**				The amortization of Series 98 to 102 Rate Swaps is included in Long Term Debt FERC Acct 427

Interest on Outstanding Network Credits Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Interest on Network Credits	Description of the Interest on the Credits
	Revenue Credits & Interest on Network Credits					
155	Interest on Network Credits		(Note N)	Company Records		
						Add more lines if necessary

Facility Credits under Section 30.9 of the PJM OATT

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Amount	Description & PJM Documentation
	Net Revenue Requirement					
171	Facility Credits under Section 30.9 of the PJM OATT				-	

PJM Load Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						1 CP Peak	Description & PJM Documentation
	Network Zonal Service Rate						
173		1 CP Peak		(Note L)	PJM Data		

Statements BG/BH (Present and Proposed Revenues)

	Customer	Billing Determinants	Current Rate	Proposed Rate	Current Revenues	Proposed Revenues	Change in Revenues				
					-	-	-				
	Note: ComEd does not have billing determinants of its wholesale customers. This is confidential information in the possession of PJM Interconnection, LLC.										
	Total				-	-	-				

Other Income Tax Adjustments

Line	Component Descriptions	Instruction References	Transmission Depreciation Expense Amount		Tax Rate from Attachment H-13A, Line 131		Amount to Attachment H-13A,Line 136e
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense	Instr. 1, 2, 3 below	$	X		=	$
	Amortization of Deficient /(Excess) Deferred Taxes - Transmission Component						
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component	Instr. 4 below					
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	Instr. 4 below					
136d	Amortization of Other Flow-Through Items - Transmission Component	Instr. 5 below					(70,762)
136e	**Total Other Income Tax Adjustments - Expense / (Benefit)**						$ (

Instr. #s Instructions

Inst. 1	Transmission Depreciation Expense is the gross cumulative amount based upon tax records of capitalized AFUDC equity embedded in the gross plant attributable to the transmission function multiplied by the Capital Recovery Rate (described in Instruction 2).
Inst. 2	Capital Recovery Rate is the book depreciation rate applicable to the underlying plant assets.
Inst. 3	"AFUDC Equity" category reflects the nondeductible component of depreciation expense related to the capitalized equity portion of Allowance for Funds Used During Construction (AFUDC).
Inst. 4	Upon enactment of changes in tax law, accumulated deferred income taxes are re-measured and adjusted in the Company's books of account, resulting in deficient or (excess) accumulated deferred income taxes (ADIT). Such deficient or (excess) ADIT attributed to the transmission function will be based upon tax records and calculated in the calendar year in which the deficient or (excess) amount was measured and recorded for financial reporting purposes. See Attachment 1B - ADIT Amortization, Column G, Line 31 and Line 79 for additional information and support for the current year amortization. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.
Inst. 5	Other Flow-Through Items - In the past regulatory agencies required certain federal and state income tax savings resulting from temporary differences between the amount of taxes computed for ratemaking purposes and taxes on the amount of actual current federal income tax liability to be immediately "flowed through" rates for certain assets. The "flow-through" savings were accounted for in deferred tax balances, based on the expectation and understanding that while tax savings would be immediately flowed through to ratepayers, the flow-through expense incurred when the temporary differences reverse would be recovered from ratepayers. The "Amortization of Other Flow-Through Items" represents the transmission portion of tax expense relating

to the reversal of these temporary differences. The Other Flow-Through balance as of September 30, 2018 will reverse beginning October 1, 2018 based on the prescribed periods.

Commonwealth Edison Company
Attachment 6 - Estimate and Reconciliation Worksheet

Step	Month	Year	Action

Exec Summary

Step	Month	Year	Action
1	April	Year 2	TO populates the formula with Year 1 data
2	April	Year 2	TO estimates all transmission Cap Adds for Year 2 weighted based on Months expected to be in service in Year 2
3	April	Year 2	TO adds weighted Cap Adds to plant in service in Formula (Appendix A, Line 17)
4	May	Year 2	Post results of Step 3 on PJM web site
5	June	Year 2	Results of Step 3 go into effect
6	April	Year 3	TO populates the formula with Year 2 data
7	April	Year 3	TO estimates all transmission Cap Adds during Year 3 weighted based on Months expected to be in service in Year 3
8	April	Year 3	Reconciliation - TO calculates Reconciliation by removing from Year 2 data - the total Cap Adds placed in service in Year 2 and adding weighted average in Year 2 Cap Adds in Reconciliation (adjusted to include any Reconciliation amount from prior year).
9	April	Year 3	Reconciliation - TO adds the difference between the Reconciliation in Step 8 and the forecast in Line 5 with interest to the result of Step 7 (this difference is also added to Step 8 in the subsequent year)
10	May	Year 3	Post results of Step 9 on PJM web site
11	June	Year 3	Results of Step 9 go into effect

Reconciliation Details

1	April	Year 2	TO populates the formula with Year 1 data						
					Rev Req based on Year 1 data	Must run Appendix A to get this number (without any cap adds in Appendix A, line 17)			
2	April	Year 2	TO estimates all transmission Cap Adds for Year 2 weighted based on Months expected to be in service in Year 2						
						Time Weighted Amounts			
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12		
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments		
		Dec Balance			12				
		Jan			11.5				
		Feb			10.5				
		Mar			9.5				
		Apr			8.5				
		May			7.5				
		Jun			6.5				
		Jul			5.5				
		Aug			4.5				
		Sep			3.5				
		Oct			2.5				
		Nov			1.5				
		Dec			0.5				
		Total	-	-				Total	
						0.0000		Average Months [total column (D)/ total column (A)*12]	
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line 17 of Appendix A
		CWIP (weighted monthly balances)						Total Column E	To line 43 of Appendix A
3	April	Year 2							
4	May	Year 2	Post results of Step 3 on PJM web site						
			$			Must run Appendix A to get this number (with prospective weighted cap adds in Appendix A, line 17)			
5	June	Year 2	Results of Step 3 go into effect						
6	April	Year 3	TO populates the formula with Year 2 data						
					Rev Req based on Prior Year data	Must run Appendix A to get this number (without any cap adds in Appendix A, line 17)			

7	April	Year 3	TO estimates all transmission Cap Adds during Year 3 weighted based on Months expected to be in service in Year 3						
						Time Weighted Amounts			
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12		
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments		
		Dec Balance			12				
		Jan			11.5				
		Feb			10.5				
		Mar			9.5				
		Apr			8.5				
		May			7.5				
		Jun			6.5				
		Jul			5.5				
		Aug			4.5				
		Sep			3.5				
		Oct			2.5				
		Nov			1.5				
		Dec			0.5				
		Total	-	-				Total	
								Average Months [total column (D)/ total column (A)*12]	
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line 17 of Appendix A
		CWIP (weighted monthly balances)						Total Column E	To line 43 of Appendix A
		New Transmission Plant Additions for Year 2 (weighted by months in service)							
8	April	Year 3	Reconciliation - TO calculates Reconciliation by removing from Year 2 data - the total Cap Adds placed in service in Year 2 and adding weighted average in Year 2 Cap Adds in Reconciliation (adjusted to include						

			any Reconciliation amount from prior year).									
			Remove all Cap Adds placed in service in Year 2									
			For Reconciliation only - remove actual New Transmission Plant Additions for Year 2							- $ < Input to Appendix A, Line16		
			Add weighted Cap Adds actually placed in service in Year 2									
						Time Weighted Amounts						
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12					
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments					
		Dec Balance			12							
		Jan			11.5							
		Feb			10.5							
		Mar			9.5							
		Apr			8.5							
		May			7.5							
		Jun			6.5							
		Jul			5.5							
		Aug			4.5							
		Sep			3.5							
		Oct			2.5							
		Nov			1.5							
		Dec			0.5							
		Total						Total				
								Average Months [total column (D)/ total column (A)*12]				
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line of Appendix A			
		CWIP (weighted monthly balances)						Total Column E	To line of Appendix A			
					Result of Formula for Reconciliation		Must run Appendix A with cap adds in Appendix A, line 16 & line 17					
					(Year 2 data with total of Year 2 Cap Adds removed and monthly weighted average of Year 2 Cap Adds added in)							
9	April	Year 3	Reconciliation - TO adds the difference between the Reconciliation in Step 8 and the forecast in Line 5 with interest to the result of Step 7 (this difference is also added to Step 8 in the subsequent year)									
			The Reconciliation in Step 8			The forecast in Prior Year						
			$ -			$ -						
			Interest on Amount of Refunds or Surcharges									
			Interest 35.19a for March Current Yr									
			Month	Yr		1/12 of Step 9	Interest 35.19a for March Current Yr		Months	Interest	Surcharge (Refund) Owed	
			Jun	Year 1			%		11.5			
			Jul	Year 1			%		10.5			
			Aug	Year 1			%		9.5			
			Sep	Year 1			%		8.5			
			Oct	Year 1			0.0000%		7.5			
			Nov	Year 1			0.0000%		6.5			
			Dec	Year 1			0.0000%		5.5			
			Jan	Year 2			0.0000%		4.5			
			Feb	Year 2			0.0000%		3.5			
			Mar	Year 2			0.0000%		2.5			
			Apr	Year 2			0.0000%		1.5			
			May	Year 2			0.0000%		0.5			
			Total									
						Balance	Interest		Amort	Balance		
			Jun	Year 2			0.0000%					
			Jul	Year 2			0.0000%					
			Aug	Year 2			0.0000%					
			Sep	Year 2			0.0000%					
			Oct	Year 2			0.0000%					
			Nov	Year 2			0.0000%					
			Dec	Year 2			0.0000%					
			Jan	Year 3			0.0000%					
			Feb	Year 3			0.0000%					
			Mar	Year 3			0.0000%					
			Apr	Year 3			0.0000%					
			May	Year 3			0.0000%					
			Total with interest									
			The difference between the Reconciliation in Step 8 and the forecast in Prior Year with interest									
			Total True-Up Amount									
			Rev Req based on Year 2 data with estimated Cap Adds for Year 3 (Step 8)						$			
			Revenue Requirement for Year 3									
10	May	Year 3	Post results of Step 9 on PJM web site									
			$		Post results of Step 3 on PJM web site							
11	June	Year 3	Results of Step 9 go into effect									
			$ -									

Attachment 7 - Transmission Enhancement Charge Worksheet

1		New Plant Carrying Charge					
2		**Fixed Charge Rate (FCR) if not a CIAC**					
			Formula Line				
3		A	160		Net Plant Carrying Charge without Depreciation		
4		B	167		Net Plant Carrying Charge per 100 Basis Point in ROE without Depreciation		
5		C			Line B less Line A		
6		**FCR if a CIAC**					
7		D	161		Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes		
8		**The FCR resulting from Formula in a given year is used for that year only.**					
9		**Therefore actual revenues collected in a year do not change based on cost data for subsequent years**					

10		Details		**West Loop 345 kV (100% CWIP)**				**West Loop Plant in Service**														
11	"Yes" if a project under PJM OATT Schedule 12, otherwise "No"	Schedule 12	(Yes or No)																			
12	Useful life of the project	Life																				
13	"Yes" if the customer has paid a lumpsum payment in the amount of the investment on line 29, Otherwise "No"	CIAC	(Yes or No)																			
14	Input the allowed increase in ROE	Increased ROE (Basis Points)																				
15	From line 3 above if "No" on line 13 and From line 7 above if "Yes" on line 13	11.5% ROE		%				%				%										
16	(Line 14/100 times line 5) + Line 15	FCR for This Project		%				%				%										
17	Project subaccount of Plant in Service Account 101 or 106 if not yet classified	Investment																				
18	Line 17 divided by line 12	Annual Depreciation Exp			-				-													
19	Month in which project is placed in service (e.g. Jan=1)	In Service Month (1-12)																				
20			**Invest Yr**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Total**	**Incentive Charged**	**Revenue Credit**
21		W 11.5 % ROE	2007																	$		$
22		W Increased ROE	2007																	$	$	
23		W 11.5 % ROE	2008																	$		$
24		W Increased ROE	2008																	$	$	
25		W 11.5 % ROE	2009																	$		$
26		W Increased ROE	2009																	$	$	
27		W 11.5 % ROE	2010																	$		$
28		W Increased ROE	2010																	$	$	
29		W 11.5 % ROE	2011																	$		$
30		W Increased ROE	2011																	$	$	
31		W 11.5 % ROE	2012																	$		$
32		W Increased ROE	2012																	$	$	
33		W 11.5 % ROE	2013																	$		$
34		W Increased ROE	2013																	$	$	
35		W 11.5 % ROE	2014																	$		$
36		W Increased ROE	2014																	$	$	
37		W 11.5 % ROE	2015																	$		$
38		W Increased ROE	2015																	$	$	
39		W 11.5 % ROE	2016																	$		$
40		W Increased ROE	2016																	$	$	
41		W 11.5 % ROE	2017																	$		$
42		W Increased ROE	2017																	$	$	
43		W 11.5 % ROE	2018																	$		$
44		W Increased ROE	2018																	$	$	
45		W 11.5 % ROE	2019																	$		$
46		W Increased ROE	2019																	$	$	
47		W 11.5 % ROE	2020																	$		$
48		W Increased ROE	2020																	$	$	
49		W 11.5 % ROE	2021																	$		$
50		W Increased ROE	2021																	$	$	
51		W 11.5 % ROE	2022																	$		$
52		W Increased ROE	2022																	$	$	
53		W 11.5 % ROE	2023																	$		$
54		W Increased ROE	2023																	$	$	
55		W 11.5 % ROE	2024																	$		$
56		W Increased ROE	2024																	$	$	
57		W 11.5 % ROE	2025																	$		$
58		W Increased ROE	2025																	$	$	
59		W 11.5 % ROE	2026																	$		$
60		W Increased ROE	2026																	$	$	
61			....					....		.....	....	....	....	.....	....	....	....	.....	....			$
62			....					....	.....	.....	....	....	.....	.....	....	....	.....	.....	....		$	

On the formulas used in the Columns for lines 22+ are as follows

For Plant in service: (first year means first year the project is placed in service)

"Beginning" is the investment on line 17 for the first year and is the "Ending" for the prior year after the first year

"Depreciation" is the annual depreciation in line 18 divided by twelve times the difference of thirteen minus line 19 in the first year and line 18 thereafter if "no" on line 13. "Depreciation" is "0" (zero) if "Yes" on line 13

"Ending" is "Beginning" less "Depreciation"

Revenue is "Ending" times line 16 for the current year times the quotient line 19 divided by 13 plus "Depreciation" for the first year and "Ending" times line 16 plus "Depreciation" thereafter

For CWIP:

Beginning is the line 17 for that year

Depreciation is not used

Ending is the same as Beginning

Revenue is Ending times line 16 for the current year

Commonwealth Edison Company

Attachment 8 - Company Exhibit - Securitization Workpaper

Line #					
		Long Term Interest			
100		**Less LTD Interest on Securitization Bonds**			
		Capitalization			
112		**Less LTD on Securitization Bonds**			
		Calculation of the above Securitization Adjustments			

Commonwealth Edison Company

Attachment 9 - Depreciation Rates

Plant Type	Applied Deprec. Rate (%)
Transmission[1]	2.53
General and Intangible Plant	
Account 390: Structures and Improvement	2.60
Account 391.01: Office Furniture & Equipment: Office Machines	10.00
Account 391.02: Office Furniture & Equipment: Furniture/Equipment	6.67
Account 391.03: Office Furniture & Equipment: Computer Equipment	19.99
Account 392.00: Transportation Equipment - Passenger Cars	10.92
Account 392.01: Transportation Equipment -Tractor Trucks	1.24
Account 392.02: Transportation Equipment –Trailers	4.41
Account 392.05: Transportation Equipment - Trucks < 13,000 pounds	7.45
Account 392.06: Transportation Equipment - Trucks >= 13,000 pounds	5.86
Account 393: Stores Equipment	6.67
Account 394: Tools, Shop, & Garage Equipment	4.00
Account 395: Laboratory Equipment	6.67
Account 396: Power Operated Equipment	6.63
Account 397: Communications Equipment	7.33
Account 397.01: Communications Equipment: Mesh Comm. Network Devices	11.00
Account 397.02: Communications Equipment: Smart Street Lights	9.17
Account 397.,03: Communications Equipment: SCADA, Fiber Optic, and Microwave Equipment	2.27
Account 398: Miscellaneous Equipment	6.67
Account 303: Miscellaneous Intangible Plant	10.30

[1] ComEd applies a single composite depreciation rate to Transmission Plant. The composite rate is determined by calculating the weighted average rate of Accounts 350-359. Within five years of the effective date of the Settlement in Docket No ER19-5 et al, and at least every five years thereafter,ComEd will file an FPA Section 205 rate proceeding to revise its depreciation rates (unless the company has otherwise submitted an FPA Section 205 rate filing that addresses its depreciation rates in the prior five years).

ATTACHMENT 2

CLEAN TARIFF SHEETS

PJM TARIFF ATTACHMENT H-13A

Attachment H-13A					
Commonwealth Edison Company					
Formula Rate -- Appendix A		Notes	FERC Form 1 Page # or Instruction		Year
Shaded cells are input cells					
Allocators					
	Wages & Salary Allocation Factor				
1	Transmission Wages Expense		p354.21.b		
2	Total Wages Expense		p354.28.b		
3	Less A&G Wages Expense		p354.27.b		
4	Total Wages Less A&G Wages Expense		(Line 2 - Line 3)		
5	**Wages & Salary Allocator**		(Line 1 / Line 4)		**%**
	Plant Allocation Factors				
6	Electric Plant in Service	**(Note B)**	p207.104.g		
7	Accumulated Depreciation (Total Electric Plant)	**(Note J)**	p219.29.c		
8	Accumulated Amortization	**(Note A)**	p200.21.c		
9	Total Accumulated Depreciation		(Line 7 + 8)		
10	Net Plant		(Line 6 - Line 9)		
11	Transmission Gross Plant		(Line 29 - Line 28)		
12	**Gross Plant Allocator**		(Line 11 / Line 6)		**%**
13	Transmission Net Plant		(Line 41 - Line 28)		
14	**Net Plant Allocator**		(Line 13 / Line 10)		**%**
Plant Calculations					
	Plant In Service	**(Note X)**			
15	Transmission Plant In Service	(Note B)	p207.58.g		
16	For Reconciliation only - remove New Transmission Plant Additions for Current Calendar Year	For Reconciliation Only	Attachment 6		
17	New Transmission Plant Additions for Current Calendar Year (weighted by months in service)	**(Note B)**	Attachment 6		
18	**Total Transmission Plant**		(Line 15 - Line 16 + Line 17)		
19	General		p207.99.g		
20	Intangible		p205.5.g		
21	Total General and Intangible Plant		(Line 19 + Line 20)		
22	Less: General Plant Account 397 -- Communications		p207.94.g		
23	General and Intangible Excluding Acct. 397		(Line 21 - Line 22)		
24	Wage & Salary Allocator		(Line 5)		%
25	General and Intangible Plant Allocated to Transmission		(Line 23 * Line 24)		
26	Account No. 397 Directly Assigned to Transmission		Attachment 5		
27	**Total General and Intangible Functionalized to Transmission**		(Line 25 + Line 26)		
28	**Plant Held for Future Use (Including Land)**	**(Note C)**	Attachment 5		
29	**Total Plant In Rate Base**		**(Line 18 + Line 27 + Line 28)**		
	Accumulated Depreciation	**(Note X)**			
30	Transmission Accumulated Depreciation	(Note J)	p219.25.c		
31	Accumulated General Depreciation	**(Note J)**	p219.28.c		
32	Less: Amount of General Depreciation Associated with Acct. 397	**(Note J)**	Attachment 5		
33	Balance of Accumulated General Depreciation		(Line 31 - Line 32)		
34	Accumulated Amortization		(Line 8)		
35	Accumulated General and Intangible Depreciation Ex. Acct. 397		(Line 33 + 34)		
36	Wage & Salary Allocator		(Line 5)		%
37	Subtotal General and Intangible Accum. Depreciation Allocated to Transmission		(Line 35 * Line 36)		
38	Percent of Acct. 397 Directly Assigned to Transmission		(Line 26 / Line 22)		%
39	Amount of Gen. Depr. Associated with Acct. 397 Directly Assigned to Trans.		(Line 38 * Line 32)		
40	**Total Accumulated Depreciation**		**(Sum Lines 30, 37 & 39)**		
41	**Total Net Property, Plant & Equipment**		**(Line 29 - Line 40)**		

Adjustment To Rate Base

	Accumulated Deferred Income Taxes				
42a	Account No. 190 (ADIT)	(Note V)	Attachment 1A - ADIT, Line 1		
42b	Account No. 281 (ADIT - Accel. Amort)	(Note V)	Attachment 1A - ADIT, Line 2		
42c	Account No. 282 (ADIT - Other Property)	(Note V)	Attachment 1A - ADIT, Line 3		
42d	Account No. 283 (ADIT - Other)	(Note V)	Attachment 1A - ADIT, Line 4		
42e	Account No. 255 (Accum. Deferred Investment Tax Credits)	(Note U)	Attachment 1A - ADIT		
42f	Accumulated Deferred Income Taxes Allocated To Transmission		Line 42a + 42b + 42c + 42d + 42e		
	Unamortized Deficient / (Excess) ADIT				
42g	Unamortized Deficient / (Excess) ADIT (Federal)	(Note W)	Attachment 1B - ADIT Amortization		
42h	Unamortized Deficient / (Excess) ADIT (State)	(Note W)	Attachment 1B - ADIT Amortization		
42i	Unamortized Deficient / (Excess) ADIT Allocated to Transmission		Line 42g + 42h		
42j	Adjusted Accumulated Deferred Income Taxes Allocated To Transmission		Line 42f + 42i		
	CWIP for Incentive Transmission Projects				
43	CWIP Balances for Current Rate Year	(Note H)	Attachment 6		
	Prepayments				
44	Prepayments (excluding Prepaid Pension Asset)	(Note A)	Attachment 5		
	Materials and Supplies				
45	Undistributed Stores Expense	(Note A)	p227.6.c & 16.c		
46	Wage & Salary Allocator		(Line 5)		%
47	Total Undistributed Stores Expense Allocated to Transmission		(Line 45 * Line 46)		
48	Transmission Materials & Supplies	(Note T)	(p227.8.c + p227.5.c)		
49	**Total Materials & Supplies Allocated to Transmission**		(Line 47 + Line 48)		
	Cash Working Capital				
50	Operation & Maintenance Expense (excluding Interest Only Return on Prepaid Pension Asset)		(Line 85 - Line 84)		
51	1/8th Rule		1/8		12.5%
52	**Total Cash Working Capital Allocated to Transmission**		(Line 50 * Line 51)		
	Network Credits				
53	Outstanding Network Credits	(Note N)	Attachment 5		
54	**Total Adjustment to Rate Base**		(Lines 42j + 43 + 44 + 49 + 52 - 53)		
55	**Rate Base**		(Line 41 + Line 54)		

Operations & Maintenance Expense

	Transmission O&M				
56	Transmission O&M		Attachment 5		
57	Less Account 565		Attachment 5		
58	Plus Transmission Revenue Requirement of Commonwealth Edison of Indiana booked to Account 565		Attachment 5		
59	Plus Schedule 12 Charges billed to Transmission Owner and booked to Account 565	(Note O)	PJM Data		
60	Plus Transmission Lease Payments	(Note A)	p200.4.c		
61	**Transmission O&M**		(Lines 56 - 57 + 58 + 59 + 60)		
	Allocated Administrative & General Expenses				
62	Total A&G		Attachment 5		
63	Plus: Fixed PBOP expense	(Note J)	fixed		7,818,071
64	Less: Actual PBOP expense		Attachment 5		
65	Less: Salaries and Benefits of specified Exelon Corp top executives		Attachment 5		
66	Less: Power Procurement Expense		Attachment 5		
67	Less Property Insurance Account 924		p323.185.b		
68	Less Regulatory Commission Exp Account 928	(Note E)	p323.189.b		
69	Less General Advertising Exp Account 930.1		p323.191.b		
70	Less EPRI Dues	(Note D)	p352 & 353		
71	**Administrative & General Expenses**		Sum (Lines 62 to 63) - Sum (Lines 64 to 70)		
72	Wage & Salary Allocator		(Line 5)		%
73	**Administrative & General Expenses Allocated to Transmission**		(Line 71 * Line 72)		
	Directly Assigned A&G				
74	Regulatory Commission Exp Account 928	(Note G)	Attachment 5		
75	General Advertising Exp Account 930.1	(Note K)	Attachment 5		
76	Subtotal - Accounts 928 and 930.1 - Transmission Related		(Line 74 + Line 75)		

77	Property Insurance Account 924		(Line 67)	
78	General Advertising Exp Account 930.1	(Note F)	Attachment 5	
79	Total Accounts 928 and 930.1 - General		(Line 77 + Line 78)	
80	Net Plant Allocator		(Line 14)	%
81	**A&G Directly Assigned to Transmission**		(Line 79 * Line 80)	
	Interest on Prepaid Pension Asset			
82	Prepaid Pension Asset (net of associated ADIT)		Attachment 5	
83	LTD Cost Rate		(Line 120)	%
84	**Interest on Prepaid Pension Asset**		(Line 82 * Line 83)	
85	**Total Transmission O&M and Interest on Prepaid Pension Asset**		**(Lines 61 + 73 + 76 + 81 + 84)**	

Depreciation & Amortization Expense					
	Depreciation Expense		(Note X)		
86	Transmission Depreciation Expense Including Amortization of Limited Term Plant		(Note J)	p336.7.b&c&d	
87	General Depreciation Expense Including Amortization of Limited Term Plant		(Note J)	p336.10.b&c&d	
88	Amount of General Depreciation Expense Associated with Acct. 397		(Note J)	Attachment 5	
89	Balance of General Depreciation Expense			(Line 87 - Line 88)	
90	Intangible Amortization		(Note A)	p336.1.d&e	
91	Total			(Line 89 + Line 90)	
92	Wage & Salary Allocator			(Line 5)	%
93	General Depreciation & Intangible Amortization Allocated to Transmission			(Line 91 * Line 92)	
94	General Depreciation Expense for Acct. 397 Directly Assigned to Transmission			(Line 88 * Line 38)	
95	**General Depreciation and Intangible Amortization Functionalized to Transmission**			(Line 93 + Line 94)	
96	**Total Transmission Depreciation & Amortization**			**(Lines 86 + 95)**	
Taxes Other than Income Taxes					
97	**Taxes Other than Income Taxes**			Attachment 2	
98	**Total Taxes Other than Income Taxes**			**(Line 97)**	
Return \ Capitalization Calculations					
	Long Term Interest				
99	Long Term Interest			Attachment 5	
100	Less LTD Interest on Securitization Bonds		(Note P)	Attachment 8	
101	**Long Term Interest**			(Line 99 - Line 100)	
102	**Preferred Dividends**		enter positive	p118.29.c	
	Common Stock				
103	Proprietary Capital			p112.16.c	
104	Less Accumulated Other Comprehensive Income Account 219			p112.15.c	
105	Less Preferred Stock			(Line 114)	
106	Less Account 216.1			p112.12.c	
107	**Common Stock**			(Line 103 - 104 - 105 - 106)	
	Capitalization				
108	Long Term Debt			p112.18 through 21.c	
109	Less Loss on Reacquired Debt			p111.81.c	
110	Plus Gain on Reacquired Debt			p113.61.c	
111	Less ADIT associated with Gain or Loss			Attachment 1A - ADIT, Line 6	
112	Less LTD on Securitization Bonds		(Note P)	Attachment 8	
113	Total Long Term Debt			(Line 108 - 109 + 110 - 111 - 112)	
114	Preferred Stock			p112.3.c	
115	Common Stock			(Line 107)	
116	**Total Capitalization**			(Sum Lines 113 to 115)	
117	Debt %	Total Long Term Debt	(Note Q)	(Line 113 / Line 116)	%
118	Preferred %	Preferred Stock		(Line 114 / Line 116)	%
119	Common %	Common Stock	(Note Q)	(Line 115 / Line 116)	%
120	Debt Cost	Total Long Term Debt		(Line 101 / Line 113)	

121		Preferred Cost	Preferred Stock		(Line 102 / Line 114)		
122		Common Cost	Common Stock	**(Note J)**	Fixed		11.50%
123		Weighted Cost of Debt	Total Long Term Debt (WCLTD)		(Line 117 * Line 120)		
124		Weighted Cost of Preferred	Preferred Stock		(Line 118 * Line 121)		
125		Weighted Cost of Common	Common Stock		(Line 119 * Line 122)		
126	**Rate of Return on Rate Base (ROR)**				(Sum Lines 123 to 125)		
127	**Investment Return = Rate Base * Rate of Return**				**(Line 55 * Line 126)**		

Composite Income Taxes

	Income Tax Rates						
128		FIT=Federal Income Tax Rate		**(Note I)**			
129		SIT=State Income Tax Rate or Composite		**(Note I)**			
130		p	(percent of federal income tax deductible for state purposes)		Per State Tax Code		%
131		T	T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =				%
132a		T / (1-T)					%
132b		Tax Gross-Up Factor	1*1/(1-T)				
	ITC Adjustment			**(Note U)**			
133		Investment Tax Credit Amortization		enter negative	Attachment 1A - ADIT		
134		Tax Gross-Up Factor			(Line 132b)		%
135		Net Plant Allocation Factor			(Line 14)		%
136		**ITC Adjustment Allocated to Transmission**			(Line 133 * Line 134 * Line 135)		
	Other Income Tax Adjustment						
136a		Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense		**(Note R)**	Attachment 5, Line 136a		
136b		Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component		**(Note R)**	Attachment 5, Line 136b		%
136c		Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component		**(Note R)**	Attachment 5, Line 136c		
136d		Amortization of Other Flow-Through Items - Transmission Component		**(Note R)**	Attachment 5, Line 136d		
136e		Other Income Tax Adjustments - Expense / (Benefit)			Line 136a + 136b + 136c + 136d		
136f		Tax Gross-Up Factor			–(Line 132b)		
136g		Other Income Tax Adjustment			Line 136e*136f		
137	**Income Tax Component =**		(T/1-T) * Investment Return * (1-(WCLTD/ROR)) =		[Line 132a * Line 127 * (1- (Line 123 / Line 126))]		
138	**Total Income Taxes**				**(Line 136 + Line 136g + Line 137)**		

Revenue Requirement

	Summary						
139		Net Property, Plant & Equipment			(Line 41)		
140		Total Adjustment to Rate Base			(Line 54)		
141		**Rate Base**			(Line 55)		
142		Total Transmission O&M			(Line 85)		
143		Total Transmission Depreciation & Amortization			(Line 96)		
143A		Abandoned Plant Recovery Associated with Superconductor Cable Development Project		**(Note S)**			
144		Taxes Other than Income			(Line 98)		
145		Investment Return			(Line 127)		
146		Income Taxes			(Line 138)		
147		**Gross Revenue Requirement**			**(Sum Lines 142 to 146)**		
	Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities						
148		Transmission Plant In Service			(Line 15)		
149		Excluded Transmission Facilities		**(Note M)**	Attachment 5		
150		Included Transmission Facilities			(Line 148 - Line 149)		
151		Inclusion Ratio			(Line 150 / Line 148)		
152		Gross Revenue Requirement			(Line 147)		
153		**Adjusted Gross Revenue Requirement**			(Line 151 * Line 152)		
	Revenue Credits & Interest on Network Credits						
154		**Revenue Credits**			Attachment 3		
155		**Interest on Network Credits**		**(Note N)**	Attachment 5		
156		**Net Revenue Requirement**			**(Line 153 - Line 154 + Line 155)**		
	Net Plant Carrying Charge						
157		Gross Revenue Requirement			(Line 152)		
158		Net Transmission Plant			(Line 15 - Line 30)		
159		Net Plant Carrying Charge			(Line 157 / Line 158)		
160		Net Plant Carrying Charge without Depreciation			(Line 157 - Line 86) / Line 158		
161		Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes			(Line 157 - Line 86 - Line 127 - Line 138) / Line 158		
	Net Plant Carrying Charge Calculation per 100 Basis Point increase in ROE						
162		Gross Revenue Requirement Less Return and Taxes			(Line 152 - Line 145 - Line 146)		
163		Increased Return and Taxes			Attachment 4		
164		Net Revenue Requirement per 100 Basis Point increase in ROE			(Line 162 + Line 163)		
165		Net Transmission Plant			(Line 15 - Line 30)		

166		Net Plant Carrying Charge per 100 Basis Point increase in ROE			(Line 164 / Line 165)		
167		Net Plant Carrying Charge per 100 Basis Point in ROE without Depreciation			(Line 164 - Line 86) / Line 165		
168		**Net Revenue Requirement**			(Line 156)		
169		True-up amount			Attachment 6		
170		Plus any increased ROE calculated on Attachment 7 other than PJM Sch. 12 projects not paid by other PJM transmission			Attachment 7		
171		Facility Credits under Section 30.9 of the PJM OATT			Attachment 5		
172		**Net Zonal Revenue Requirement**			(Line 168 + 169 + 170 + 171)		
	Network Zonal Service Rate						
173		1 CP Peak		**(Note L)**	PJM Data		
174		Rate ($/MW-Year)			(Line 172 / 173)		
175		**Network Service Rate ($/MW/Year)**		**(Note ZZ)**	**(Line 174)**		**$**

Notes

A Electric portion only

B Line 16, for the Reconciliation, includes New Transmission Plant that was actually placed in service weighted by the number of months it was actually in service
Line 17 includes New Transmission Plant to be placed in service in the current calendar year that is not included in the PJM regional Transmission Plan (RTEP) (time-weighted) as shown on Attachment 6. Transmission plant includes any in-service portion of the plant associated with Phase 1 and 2 of the Superconductor Cable Development Project.

C Includes Transmission portion only. At each annual informational filing, Company will identify for each parcel of land an intended use within a 15 year period.

D Includes all EPRI Annual Membership Dues

E Includes all Regulatory Commission Expenses

F Includes Safety related advertising included in Account 930.1

G Includes Regulatory Commission Expenses directly related to transmission service, RTO filings, or transmission siting itemized in Form 1 at 351.h.

H CWIP can only be included if authorized by the Commission. In Docket No. ER14-1708, ComEd requested permission to recover in rate base up to 100% of CWIP associated with the Grand Prairie Project. All such amounts to be included in rate base will be recorded in Attachment 6. As directed by the Order granting ComEd's request, 147 FERC ¶ 61,141, P 26 (2014), and as documented in ComEd's June 27, 2014 compliance filing, for CWIP amounts that ComEd places in rate base through Attachment 6, ComEd will perform manual adjustments to the account balances in Account 107 to manually exclude non-invoiced expenditures, suspended or disputed invoices, and contract retentions and will impose a 60 day delay so that the amounts are added to rate base after they are to be paid.

I The currently effective income tax rate, where FIT is the Federal income tax rate; SIT is the State income tax rate, and p = "the percentage of federal income tax deductible for state income taxes". If the utility includes taxes in more than one state, it must explain in Attachment 5 the name of each state and how the blended or composite SIT was developed.

J ROE will be supported in the original filing and no change in ROE will be made absent a filing at FERC.
PBOP expense is fixed until changed as the result of a filing at FERC.
Depreciation rates shown in Attachment 9 are fixed until changed as the result of a filing at FERC.
If book depreciation rates are different than the Attachment 9 rates, ComEd will provide workpapers at the annual update to reconcile formula depreciation expense and depreciation accruals to Form No. 1 amounts.

K Education and outreach expenses relating to transmission, for example siting or billing

L As provided for in Section 34.1 of the PJM OATT; the PJM established billing determinants will not be revised or updated in the annual rate reconciliations.

M Amount of transmission plant excluded from rates per Attachment 5.

N Outstanding Network Credits is the balance of Network Facilities Upgrades Credits due Transmission Customers who have made lump-sum payments towards the construction of Network Transmission Facilities consistent with Paragraph 657 of Order 2003-A.
Interest on the Network Credits as booked each year is added to the revenue requirement to make the Transmission Owner whole on Line 155.

O Payments made under Schedule 12 of the PJM OATT that are not directly assessed to load in the Zone under Schedule 12 are included in Transmission O&M on Line 56. If they are booked to Acct 565, they are included on Line 59.

P Securitization bonds may be included in the capital structure.

Q Equity and debt ratios will be the ratios determined by the actual capital structure and the specified calculation processes of the formula, except that if during the period May 1, 2007 through May 31, 2009 the formula produces an equity ratio exceeding 58.0%, the formulaic value at Line 119 shall be manually set to 58.0% and the formulaic value at Line 117 shall be manually set to 42.0% less the percentage shown at Line 118.
If, during the period June 1, 2009 through May 31, 2010, the formula produces an equity ratio exceeding 57.0%, the formulaic value at Line 119 shall be manually set to 57% and the value at Line 117 shall be manually set to 43.0% less the percentage shown at Line 118.
If, during the period June 1, 2010 through May 31, 2011, the formula produces an equity ratio exceeding 56.0%, the formulaic value at Line 119 shall be manually set to 56% and the value at Line 117 shall be manually set to 44.0% less the percentage shown at Line 118.
If, during any period following May 31, 2011, the formula produces an equity ratio exceeding 55.0%, the formulaic value at Line 119 shall be manually set to 55.0% and the formulaic value at Line 117 shall be manually set to 45.0% less the percentage shown at Line 118.

R See Attachment 5 - Cost Support, section entitled "Other Income Tax Adjustment" for additional information.

S ComEd is authorized to track costs associated with the Phase 1 and 2 of the Superconductor Cable Development Project, but will recover such costs only after a future Section 205 filing in the event all or a portion of the project is abandoned, at no fault of ComEd, either before or after the Project goes into service.

T Only the transmission portion of amounts reported at Form 1, page 227, line 5 is used. The transmission portion of line 5 is specified in a footnote to the Form 1, page 227.

U Commonwealth Edison Company elected to amortize investment tax credits against recoverable income tax expense, rather than to reduce rate base by unamortized investment tax credit.
Amortization reduces income tax expense and reduces the revenue requirement by the amount of the Investment Tax Credit Amortization multiplied by (1/(1-T)).

V The Accumulated Deferred Income Tax (ADIT) balances in Accounts 190, 281, 282, and 283 are measured using the enacted tax rate that is expected to apply when the underlying temporary differences are expected to be settled or realized. See Attachment 1A - ADIT for additional information.

W These balances represent the unamortized federal and state deficient / (excess) deferred income taxes. See Attachment 1B - ADIT Amortization for additional information.

X Plant and depreciation values include ARO amounts and associated depreciation consistent with ComEd Form 1. ComEd has submitted the requisite support for such recovery as provided in 18 C.F.R. § 35.18.

ZZ The revisions made in the Order No. 864 Cleanup Filing will not require any adjustment to rates, or annual update filings, for rates charged and annual update filings made prior to the date of the order accepting the revised tariff sheets.

Commonwealth Edison Company
Accumulated Deferred Income Taxes (ADIT)
Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

Line	ADIT	Total	Gas, Production, Distribution, or Other Related	Only Transmission Related	Plant Related	Labor Related	
1	ADIT-190						Total entered in Appendix A, Line 42a
2	ADIT-281						Total entered in Appendix A, Line 42b
3	ADIT-282						Total entered in Appendix A, Line 42c
4	ADIT-283						Total entered in Appendix A Line 42d
5	**Subtotal - Transmission ADIT**						

Line	Description	Total
6	ADIT (Reacquired Debt)	

Note: ADIT associated with Gain or Loss on Reacquired Debt included in ADIT-283, Column A is excluded from rate base and instead included in Cost of Debt on Attachment H-13A, Line 111. A deferred tax (liability) should be reported as a positive balance and a deferred tax asset should be reported as a negative balance on Attachment H-13A, Line 111.

In filling out this attachment, a full and complete description of each item and justification for the allocation to Columns B - F and each separate ADIT item will be listed, dissimilar items with amounts exceeding $100,000 will be listed separately.

(A)		(B)	(C)	(D)	(E)	(F)	(G)
ADIT-190		**Total**	**Gas, Production, Distribution, or Other Related**	**Only Transmission Related**	**Plant Related**	**Labor Related**	**Justification**

Subtotal: ADIT-190 (FERC Form)								
Less: ASC 740 ADIT Adjustments excluded from rate base			-	-	-	-	-	
Less: ASC 740 ADIT Adjustments related to unamortized ITC			-	-	-	-		
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)			-	-	-	-	-	
Less: OPEB related ADIT, Above if not separately removed			-	-	-	-	-	
Total: ADIT-190								
Wages & Salary Allocator								
Net Plant Allocator								
Transmission Allocator								
Other Allocator								
ADIT - Transmission								

Instructions for Account 190:

1. **ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C**
2. **ADIT items related only to Transmission are directly assigned to Column D**
3. **ADIT items related to Plant and not in Columns C & D are included in Column E**
4. **ADIT items related to labor and not in Columns C & D are included in Column F**

5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

(A)		(B)	(C)	(D)	(E)	(F)	(G)
ADIT- 282		**Total**	**Gas, Production, Distribution, or Other Related**	**Only Transmission**	**Plant**	**Labor**	**Justification**
Subtotal: ADIT-282 (FERC Form)							
Less: ASC 740 ADIT Adjustments excluded from rate base							
Less: ASC 740 ADIT Adjustments related to AFUDC Equity							
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)							
Less: OPEB related ADIT, Above if not separately removed							
Total: ADIT-282							
Wages & Salary Allocator							
Net Plant Allocator							
Transmission Allocator							
Other Allocator							
ADIT - Transmission							

Instructions for Account 282:

1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C

2. ADIT items related only to Transmission are directly assigned to Column D

3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

(A) ADIT-283		(B) Total	(C) Gas, Production, Distribution, or Other Related	(D) Only Transmission Related	(E) Plant Related	(F) Labor Related	(G) Justification

Subtotal: ADIT-283 (FERC Form)								
Less: ASC 740 ADIT Adjustments excluded from rate base								
Less: ASC 740 ADIT Adjustments related to unamortized ITC								
Less: ASC 740 ADIT balances related to income tax regulatory assets / (liabilities)								
Less: OPEB related ADIT, Above if not separately removed								
Total: ADIT-283								
Wages & Salary Allocator								
Net Plant Allocator								
Transmission Allocator								
Other Allocator								
ADIT - Transmission								

Instructions for Account 283:
1. ADIT items related only to Non-Electric Operations (e.g., Gas, Water, Sewer), Production or Distribution Only are directly assigned to Column C
2. ADIT items related only to Transmission are directly assigned to Column D
3. ADIT items related to Plant and not in Columns C & D are included in Column E
4. ADIT items related to labor and not in Columns C & D are included in Column F
5. Deferred income taxes arise when items are included in taxable income in different periods than they are included in rates, therefore if the item giving rise to the ADIT is not included in the formula, the associated ADIT amount shall be excluded.

Attachment 1A - Accumulated Deferred Income Taxes (ADIT) Worksheet

ADITC-255				**Unamortized ITC Balance**	**Current Year Amortization**
1	Rate Base Treatment				
2	Account No. 255 (Accum. Deferred Investment Tax Credits)		To Appendix A, Line 42e		
3	Amortization				
4	Investment Tax Credit Amortization		To Appendix A, Line 133		
5	Total				
6	Form No. 1 balance (p.266) for amortization				
7	Difference /1				

/1 Difference must be zero

END

Commonwealth Edison Company
Deficient / Excess Deferred Income Taxes
Attachment 1B - Deficient / Excess Deferred Income Tax Amortization Worksheet

Federal Deficient / (Excess) Deferred Income Taxes

Tax Cuts and Jobs Act of 2017

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) December 31, 2017 ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
1	**Unprotected Non-Property**							
2	ADIT - 190	(Note A)	410.1	4 Years	$			$ -
3	ADIT - 281	(Note A)	411.1	4 Years	-			-
4	ADIT - 282	(Note A)	411.1	4 Years	-			-
5	ADIT - 283	(Note A)	411.1	4 Years				-
6	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
7	**Unprotected Property**							
8	ADIT - 190	(Note A)	410.1	Average Life	$ -			$ -
9	ADIT - 281	(Note A)	411.1	Average Life	-			-
10	ADIT - 282	(Note A)	411.1	Average Life				-
11	ADIT - 283	(Note A)	411.1	Average Life	-			-
12	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
13	**Protected Property**							
14	ADIT - 190	(Note A)	410.1	ARAM	$			-
15	ADIT - 281	(Note A)	411.1	ARAM	-			-
16	ADIT - 282	(Note A)	411.1	ARAM				-
17	ADIT - 283	(Note A)	411.1	ARAM	-			-
18	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
19	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Tax Reform Act of 1986

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D) Amortization Fixed Period	(E) September 30, 2018 ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
20	**Protected Property**							
21	ADIT - 190	(Note B)	410.1	ARAM	$ -			$ -
22	ADIT - 281	(Note B)	411.1	ARAM	-			-
23	ADIT - 282	(Note B)	411.1	ARAM				-
24	ADIT - 283	(Note B)	411.1	ARAM	-			-
25	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
26	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Total Federal Deficient / (Excess) Deferred Income Taxes

Line	(A) Deficient / (Excess) Deferred Income Taxes	(B) Notes	(C) FERC Account ADIT Deficient / (Excess) Amortization	(D)	(E) ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
27	ADIT - 190		410.1		$			$ -
28	ADIT - 281		411.1		-			-
29	ADIT - 282		411.1					-
30	ADIT - 283		411.1					-
31	**Total - Deficient / (Excess) ADIT**	Col. H entered in Appendix A, Line 42g			$	$ -	$ -	$ -
32	Tax Gross-Up Factor	Appendix A, Line 132b			1.0000	1.0000	1.0000	1.0000
33	**Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Federal Income Tax Regulatory Asset / (Liability)

Line	(A) Regulatory Assets / (Liabilities)	(B) Notes	(C)	(D)	(E) ADIT Deficient / (Excess)	(F) Blended Dates BOY Balance	(G) Current Year Amortization	(H) December 31, 2018 EOY Balance
34	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
35	Account 254 (Other Regulatory Liabilities)					-	-	-
36	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

State Deficient / (Excess) Deferred Income Taxes

Illinois (2017 Corporate Rate Change)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
						September 30, 2018		December 31, 2018
Line	Deficient / (Excess) Deferred Income Taxes	Notes	FERC Account ADIT Deficient / (Excess) Amortization	Amortization Fixed Period	ADIT Deficient / (Excess)	BOY Balance	Current Year Amortization	EOY Balance
37	**Unprotected Non-Property**							
38	ADIT - 190	(Note C)	410.1	4 Years	$			$ -
39	ADIT - 281	(Note C)	411.1	4 Years	-			-
40	ADIT - 282	(Note C)	411.1	4 Years	-			-
41	ADIT - 283	(Note C)	411.1	4 Years				-
42	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
43	**Unprotected Property**							
44	ADIT - 190	(Note C)	410.1	Average Life	$ -			$ -
45	ADIT - 281	(Note C)	411.1	Average Life	-			-
46	ADIT - 282	(Note C)	411.1	Average Life				-
47	ADIT - 283	(Note C)	411.1	Average Life	-			-
48	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
49	**Protected Property**							
50	ADIT - 190	(Note C)	410.1	NA	$ -			-
51	ADIT - 281	(Note C)	411.1	NA	-			-
52	ADIT - 282	(Note C)	411.1	NA	-			-
53	ADIT - 283	(Note C)	411.1	NA	-			-
54	**Subtotal - Deficient / (Excess) ADIT**				$ -	$ -	$ -	$ -
55	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Illinois (2011 Corporate Rate Change)

	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)
Line	Deficient / (Excess) Deferred Income Taxes	Notes	FERC Account ADIT Deficient / (Excess) Amortization	Amortization Fixed Period	ADIT Deficient / (Excess)	BOY Balance	Current Year Amortization	EOY Balance
56	**Unprotected Non-Property**							

57	ADIT - 190	(Note D)	410.1	4 Years	$			$ -
58	ADIT - 281	(Note D)	411.1	4 Years	-			-
59	ADIT - 282	(Note D)	411.1	4 Years	-			-
60	ADIT - 283	(Note D)	411.1	4 Years				-
61	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
62	**Unprotected Property**							
63	ADIT - 190	(Note D)	410.1	Average Life	$ -			$ -
64	ADIT - 281	(Note D)	411.1	Average Life	-			-
65	ADIT - 282	(Note D)	411.1	Average Life				-
66	ADIT - 283	(Note D)	411.1	Average Life	-			-
67	**Subtotal - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -
68	**Protected Property**							
69	ADIT - 190	(Note D)	410.1	NA	$ -	-	-	-
70	ADIT - 281	(Note D)	411.1	NA	-	-	-	-
71	ADIT - 282	(Note D)	411.1	NA	-	-	-	-
72	ADIT - 283	(Note D)	411.1	NA	-	-	-	-
73	**Subtotal - Deficient / (Excess) ADIT**				$ -	$ -	$ -	$ -
74	**Total - Deficient / (Excess) ADIT**				$	$ -	$ -	$ -

Total State Deficient / (Excess) Deferred Income Taxes

Line	**(A)** **Deficient / (Excess) Deferred Income Taxes**	**(B)** Notes	**(C)** FERC Account ADIT Deficient / (Excess) Amortization	**(D)**	**(E)** ADIT Deficient / (Excess)	**(F)** BOY Balance	**(G)** Current Year Amortization	**(H)** EOY Balance
75	ADIT - 190				$	$ -	$ -	$ -
76	ADIT - 281		410.1		-	-	-	-
77	ADIT - 282		411.1			-	-	-
78	ADIT - 283		411.1			-	-	-
79	**Total - Deficient / (Excess) ADIT**	Col. H entered in Appendix A, Line 42h			$	$ -	$ -	$ -
80	Tax Gross-Up Factor	Appendix A, Line 132b			1.0000	1.0000	1.0000	1.0000
81	**Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

State Income Tax Regulatory Asset / (Liability)

Line	(A) Regulatory Assets / (Liabilities)	(B) Notes	(C)	(D)	(E) ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
82	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
83	Account 254 (Other Regulatory Liabilities)					-	-	-
84	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Federal and State Income Tax Regulatory Asset / (Liability)

Federal and State Income Tax Regulatory Asset / (Liability) related to Deficient / (Excess) Deferred Income Taxes

Line	(A) Regulatory Assets / (Liabilities)	(B) Notes	(C)	(D)	(E) ADIT Deficient / (Excess)	(F) BOY Balance	(G) Current Year Amortization	(H) EOY Balance
85	Account 182.3 (Other Regulatory Assets)				$ -	$ -	$ -	$ -
86	Account 254 (Other Regulatory Liabilities)					-	-	-
87	**Total - Transmission Regulatory Asset / (Liability)**				$	$ -	$ -	$ -

Instructions

1. For transmission allocated deficient / (excess) accumulated deferred income taxes (ADIT) related to rate change(s) to income tax rates occurring after September 30, 2018, insert new amortization table(s) that delineates the deficient and (excess) ADIT by category (i.e., protected property, unprotected property, and unprotected non-property).

2. Set the amortization period for unprotected property to the average remaining book life and unprotected non-property to 4 years. The amortization of deficient and excess ADIT designated as protected will be calculated using the Average Rate Assumption Method (ARAM) or a manner that complies with the normalization requirements.

3. Update applicable formulas in the "Total Federal Deficient / (Excess) Deferred Income Taxes" and "Total State Deficient / (Excess) Deferred Income Taxes" sections to ensure appropriate inclusion of deficient / (excess) ADIT balances related to rate changes occurring after September 30, 2018.

4. Insert note explaining the event giving rise to the deficient / (excess) ADIT including the start and end date for the amortization. The amortization ceases after the related regulatory asset / liability is drawn down to zero.

Notes

A Deficient and (excess) ADIT related to the Tax Cuts and Jobs Act of 2017 (TCJA) will be amortized beginning January 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments, amendments to income tax returns, or new IRS guidance. The amortization of protected property related deficient and (excess) ADIT will be calculated using the Average Rate Assumption Method (ARAM) or a manner that complies with the normalization requirements and may vary by year depending on where each underlying asset resides in its individual life cycle. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underyling asset resides in its individual life cycle. The unprotected non-property related deficient and (excess) ADIT will be fully amortized by December 31, 2021. Note - The amortization formula in Column F will change based on where ComEd resides in the amortization cycle. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.

B The remaining unamortized deficient and (excess) ADIT related to the Tax Reform Act of 1986 will be amortized using the Average Rate Assumption Method (ARAM) as provided in the Settlement in Docket No. ER19-5 et al. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.

C The remaining unamortized deficient and (excess) ADIT related to the Illinois "Corporate Rate Increase of 2017" as of September 30, 2018 will be amortized beginning October 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments or tax return amendments. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underlying asset resides in its individual life cycle. The unprotected non-property related excess and deficient ADIT will be fully amortized by September 30, 2022. The unamortized deficient and (excess) state related ADIT including related amortization is reported net of federal taxes. Note - The amortization formula in Column G will change based on where ComEd resides in the amortization cycle. The current year amortization of excess and deficient deferred income taxes is recorded in FERC Accounts 410.1 and 411.1.

D The remaining unamortized deficient and (excess) ADIT related to the Illinois "Corporate Rate Increase of 2011" as of September 30, 2018 will be amortized beginning October 1, 2018 based on the prescribed amortization periods as provided in the Settlement in Docket No. ER19-5 et al. The amortization periods for unprotected property and unprotected non-property related deficient and (excess) ADIT are fixed and cannot be changed without the Commission's express approval except, balances and categorizations may be changed if required by audit adjustments or tax return amendments. The amortization of the unprotected property related deficient and (excess) ADIT will be calculated using the average remaining book life of the underlying assets giving rise to the balances and may vary by year depending on where each underlying asset resides in its individual life cycle. The unprotected non-property related excess and deficient ADIT will be fully amortized by September 30, 2022. The unamortized deficient and (excess) state related ADIT including related amortization is reported net of federal taxes. Note - The amortization formula in Column G will change based on where ComEd resides in the amortization cycle. The current year amortization of excess and deficient deferred income taxes is recorded in FERC Accounts 410.1 and 411.1.

Commonwealth Edison Company
Accumulated Deferred Income Taxes Remeasurement
Attachment 1C - Deficient / Excess Deferred Income Taxes Worksheet

Tax Cuts and Jobs Act of 2017

				ADIT - Pre Rate Change (December 31, 2017)					ADIT - Post Rate Change (December 31, 2017)					Deficient / (Excess) Deferred Income Taxes (December 31, 2017)								
Line	Detailed Description	Description	Category	Federal Gross Timing Difference	Federal ADIT @ 35%	State ADIT	FIT on SIT	Total ADIT	Federal Gross Timing Difference	Federal ADIT @ 21%	State ADIT	FIT on SIT	Total ADIT	Rate Change Deferred Tax Impact	Non-Recoverable	Income Tax Regulatory Asset / Liability Deferred Taxes	Deficient / (Excess) ADIT Balance	Jurisdiction Allocator	Electric Transmission	Allocator (Note B)	Transmission Allocated	FERC Account
	(A)	(B)	(C)	(D)	(E) = (D) * 35%	(F)	(G) = (F) * 35%	(H) = (E) + (F) + (G)	(I)	(J) = (I) * 21%	(K)	(L) = (K) * 21%	(M) = (J) + (K) + (L)	(N) = (H) - (M)	(O)	(P)	(Q) = (N) - (O) - (P)	(R)	(S)	(T)	(U) = (Q) * (T)	(V)
	<u>**FERC Account 190 - Non-Current (Note A)**</u>																					
1	Accrued Holiday	Accrued Holiday	Unprotected Non-Property															Labor	Yes	13.61 %		190

2	Accrued Legal	Accrued Legal	Unprotected Non-Property	Labor	No	0.00%	190
3	Accrued Vacation	Accrued Vacation	Unprotected Non-Property	Labor	Yes	13.61 %	190
4	Charitable Contributions	Charitable Contributions	Unprotected Non-Property	Excluded	No	0.00%	190
5	CPS Energy Efficiency Fund	CPS Energy Efficiency Fund	Unprotected Non-Property	Excluded	No	0.00%	190
6	Damage to Company Property	Damage to Company Property	Unprotected Non-Property	Plant	Yes	23.34 %	190
7	Deferred Gain - Like Kind Exchange	Deferred Gain - Like Kind Exchange	Unprotected Non-Property	Excluded	No	0.00%	190
8	Deferred Gain - Like Kind Exchange	Deferred Gain - Like Kind Exchange	Unprotected Non-Property	Excluded	No	0.00%	190
9	Deferred Rental Expense	Deferred Rental Expense	Unprotected Non-Property	Labor	Yes	13.61 %	190
10	Deferred Rental Expense	Deferred Rental Expense	Unprotected Non-Property	Labor	Yes	13.61 %	190

11	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Unprotected Non-Property	100% Distribution	No	0.00%	190
12	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Unprotected Non-Property	100% Distribution	No	0.00%	190
13	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Environmental Cleanup Costs - Non-MGP (Mfg Gas Plants)	Unprotected Non-Property	100% Distribution	No	0.00%	190
14	Executive Uninsured Death Benefits after Retirement	Executive Uninsured Death Benefits after Retirement	Unprotected Non-Property	Labor	Yes	13.61%	190
15	Incentive Compensation Deferred Stock Bonus Plan	Incentive Compensation Deferred Stock Bonus Plan	Unprotected Non-Property	Labor	Yes	13.61%	190
16	Incentive Compensation Plan	Incentive Compensation Plan	Unprotected Non-Property	Labor	Yes	13.61%	190
17	Interest on Projected Tax Settlements	Interest on Projected Tax Settlements	Unprotected Non-Property	Excluded	No	0.00%	190
18	Interest on	Interest on	Unprote	Excluded	No	0.00%	190

	Projected Tax Settlements	Projected Tax Settlements	cted Non-Property				
19	Liability for Severance Plans	Liability for Severance Plans	Unprotected Non-Property	Labor	Yes	13.61%	190
20	Long-Term Debt - Revaluation of Discount	Long-Term Debt - Revaluation of Discount	Unprotected Non-Property	Excluded	No	0.00%	190
21	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-Property	Labor	Yes	13.61%	190
22	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-Property	Labor	Yes	13.61%	190
23	Long-Term Incentive - Cash	Long-Term Incentive - Cash	Unprotected Non-Property	Excluded	No	0.00%	190
24	Management Deferred Compensation Plan	Management Deferred Compensation Plan	Unprotected Non-Property	Labor	Yes	13.61%	190
25	Manufactured Gas Plants - Provision	Manufactured Gas Plants - Provision	Unprotected Non-Property	Excluded	No	0.00%	190
26	Merger Costs	Merger Costs	Unprotected Non-Property	Excluded	No	0.00%	190
27	Midwest Generation	Midwest Generation	Unprotected	Excluded	No	0.00%	190

	Settlement Asset	Settlement Asset	Non-Property				
28	Obsolete Materials	Obsolete Materials	Unprotected Non-Property	Plant	Yes	23.34 %	190
29	Other Accrued Expenses	Other Accrued Expenses	Unprotected Non-Property	Excluded	No	0.00%	190
30	Other Current	Other Current	Unprotected Non-Property	Excluded	No	0.00%	190
31	Other Current	Other Non Current	Unprotected Non-Property	Labor	Yes	13.61 %	190
32	Partnerships	Partnerships	Unprotected Non-Property	Excluded	No	0.00%	190
33	Partnerships	Partnerships	Unprotected Non-Property	Excluded	No	0.00%	190
34	Partnerships	Partnerships	Unprotected Non-Property	Excluded	No	0.00%	190
35	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-Property	Labor	No	0.00%	190
36	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-	Labor	No	0.00%	190

			Property										
37	Post Retirement Health Care Liability	Post Retirement Health Care Liability	Unprotected Non-Property							Labor	No	0.00%	190
38	Provision for Bad Debt	Provision for Bad Debt	Unprotected Non-Property							Revenue	Yes	0.00%	190
39	Public Utility Fund Contribution	Public Utility Fund Contribution	Unprotected Non-Property							Excluded	No	0.00%	190
40	Regulatory (Asset)/Liab: Transmission	Regulatory (Asset)/Liab: Transmission	Unprotected Non-Property							Excluded	No	0.00%	190
41	Revenue Subject to Refund	Revenue Subject to Refund	Unprotected Non-Property							Excluded	No	0.00%	190
42	Stock Options; Other Equity Based Compensation	Stock Options; Other Equity Based Compensation	Unprotected Non-Property							Labor	Yes	13.61%	190
43	Stock Options; Other Equity Based Compensation	Stock Options; Other Equity Based Compensation	Unprotected Non-Property							Labor	Yes	13.61%	190
44	Stock Options; Other Equity Based Compensation	Stock Options; Other Equity Based Compensation	Unprotected Non-Property							Labor	Yes	13.61%	190
45	Supplem	Supplem	Unprote							Labor	Yes	13.61%	190

	ental Employee Retirement Plan	ental Employee Retirement Plan	cted Non-Property				
46	Taxes Other Than Income Taxes	Taxes Other Than Income Taxes	Unprotected Non-Property	Plant	Yes	23.34 %	190
47	Use Tax Adjustment	Use Tax Adjustment	Unprotected Non-Property	Plant	Yes	23.34 %	190
48	Use Tax Adjustment	Use Tax Adjustment	Unprotected Non-Property	Plant	Yes	23.34 %	190
49	Workers Compensation and Public Claims Reserve	Workers Compensation and Public Claims Reserve	Unprotected Non-Property	Labor	Yes	13.61 %	190
50	Federal NOL	Federal NOL	Protected Property	Plant	Yes	23.34 %	190
51	Federal NOL	Federal NOL	Protected Property	Excluded	No	0.00%	190
52	Gross Up Reclass	Gross Up Reclass	N/A	N/A	No	0.00%	190
53	FAS 109 - TCJA	FAS 109 - TCJA	N/A	N/A	No	0.00%	190
	Total FERC Account 190						
	<u>FERC Account 282 - Property</u> (<u>Note A</u>)						
54	Protected	Protected	Protecte	Plant	Yes	23.34 %	282

	Property (PowerTax)	Property (PowerTax)	d Property														
55	Non-Protected Property (PowerTax) - Plant	Non-Protected Property (PowerTax)	Unprotected Property										Plant	Yes	23.34 %		282
56	Non-Protected Property (PowerTax) - Transmission	Non-Protected Property (PowerTax)	Unprotected Property										100% Transmission	Yes	100.00%		282
57	Non-Protected Property (PowerTax) - Distribution	Non-Protected Property (PowerTax)	Unprotected Property										100% Distribution	No	0.00%		282
58	Gross Up Reclass	Gross Up Reclass	N/A										N/A	No	0.00%		282
59	FAS 109 - TCJA	FAS 109 - TCJA	N/A										N/A	No	0.00%		282
60	FIN 48 & Other Adjustment	FIN 48 & Other Adjustment	N/A										N/A	No	0.00%		282
	Total FERC Account 282																
	FERC Account 283 - Non-Current (Note A)																
61	Accelerated Depr AMI - Related to Reg Assets	Accelerated Depr AMI - Related to Reg Assets	Unprotected Non-Property										100% Distribution	No	0.00%		283
62	Accrued Benefits	Accrued Benefits	Unprotected Non-Property										Labor	Yes	13.61 %		283

63	Loss on Reacquired Debt	Loss on Reacquired Debt	Unprotected Non-Property	Plant	No	0.00%	283
64	Regulatory (Asset)/Liab: AMP - Other Costs	Regulatory (Asset)/Liab: AMP - Other Costs	Unprotected Non-Property	Excluded	No	0.00%	283
65	Regulatory (Asset)/Liab: AMP - retired meters and AMI costs	Regulatory (Asset)/Liab: AMP - retired meters and AMI costs	Unprotected Non-Property	100% Distribution	No	0.00%	283
66	Deferred Gain - Sale of Easement	Deferred Gain - Sale of Easement	Unprotected Non-Property	Plant	Yes	23.34 %	283
67	Deferred Revenue - Fiber Optics Lease	Deferred Revenue - Fiber Optics Lease	Unprotected Non-Property	Communication	No	0.00%	283
68	Equity Earnings in Uncon Sub	Equity Earnings in Uncon Sub	Unprotected Non-Property	Excluded	No	0.00%	283
69	Regulatory (Asset)/Liab: Energy Efficiency	Regulatory (Asset)/Liab: Energy Efficiency	Unprotected Non-Property	Excluded	No	0.00%	283
70	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Unprotected Non-Property	Excluded	No	0.00%	283

71	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property							Labor	Yes	13.61 %	283
72	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property							Labor	Yes	13.61 %	283
73	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property							Labor	Yes	13.61 %	283
74	Pension Contribution - Net of Book Provision 9.5%	Pension Contribution - Net of Book Provision 9.5%	Unprotected Non-Property							Labor	Yes	13.61 %	283
75	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Unprotected Non-Property							Excluded	No	0.00%	283
76	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Regulatory (Asset)/Liab: MGP-Environmental Remediation	Unprotected Non-Property							Excluded	No	0.00%	283
77	Reg Asset - Capital Leases	Reg Asset - Capital Leases	Unprotected Non-Property							Excluded	No	0.00%	283
78	Regulatory (Asset)/Liab: Distribution: Other	Regulatory (Asset)/Liab: Distribution: Other	Unprotected Non-Property							100% Distribution	No	0.00%	283

	Deferred (A-Base)	Deferred (A-Base)					
79	Regulatory (Asset)/Liab: Distribution: Other Deferred (Merger)	Regulatory (Asset)/Liab: Distribution: Other Deferred (Merger)	Unprotected Non-Property	100% Distribution	No	0.00%	283
80	Regulatory (Asset)/Liab: Distribution: Other Deferred (Storm)	Regulatory (Asset)/Liab: Distribution: Other Deferred (Storm)	Unprotected Non-Property	100% Distribution	No	0.00%	283
81	Regulatory (Asset)/Liab: Distribution Formula Rate	Regulatory (Asset)/Liab: Distribution Formula Rate	Unprotected Non-Property	Excluded	No	0.00%	283
82	Regulatory (Asset)/Liab: Distribution Formula Rate	Regulatory (Asset)/Liab: Distribution Formula Rate	Unprotected Non-Property	Excluded	No	0.00%	283
83	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Regulatory (Asset)/Liab: Distribution Rate Case Matters	Unprotected Non-Property	Excluded	No	0.00%	283
84	Regulatory (Asset)/Liab: Rider UF	Regulatory (Asset)/Liab: Rider UF	Unprotected Non-Property	Excluded	No	0.00%	283
85	Regulatory	Regulatory	Unprotected	Excluded	No	0.00%	283

	(Asset)/Liab: Distribution Rate Case Matters	(Asset)/Liab: Distribution Rate Case Matters	Non-Property				
86	Chicago Arbitration Settlement	Chicago Arbitration Settlement	Unprotected Non-Property	Excluded	No	0.00%	283
87	Incentive Compensation Capitalized (Global Settlement)	Incentive Compensation Capitalized (Global Settlement)	Unprotected Non-Property	100% Distribution	No	0.00%	283
88	Midwest Generation Settlement Liab	Midwest Generation Settlement Liab	Unprotected Non-Property	Excluded	No	0.00%	283
89	FIT on SIT	FIT on SIT	Unprotected Non-Property	Excluded	No	0.00%	283
90	Swap and Hedging Transactions	Swap and Hedging Transactions	Unprotected Non-Property	Plant	Yes	23.34%	283
91	Swap and Hedging Transactions	Swap and Hedging Transactions	Unprotected Non-Property	Plant	Yes	23.34%	283
92	ITC Def Tax	ITC Def Tax	N/A	N/A	No	0.00%	283
93	FAS 109 - Regulatory Asset Electric	FAS 109 - Regulatory Asset Electric	N/A	N/A	No	0.00%	283
94	SFAS109 - Regulatory Liability Electric	SFAS109 - Regulatory Liability Electric	N/A	N/A	No	0.00%	283

95	Gross Up Reclass	Gross Up Reclass	N/A								N/A	No	0.00%		283
96	FAS 109 - TCJA	FAS 109 - TCJA	N/A								N/A	No	0.00%		283
	Total FERC Account 283														
97	**Grand Total**														
									Protected Property						
									Unprotected Property						
									Unprotected Non-Property						
									Total Unprotected						
									Total (Excess) / Deficient ADIT						

Instructions

1. In accordance with ASC 740, deferred tax assets and liabilities are adjusted (re-measured) for the effect of the changes in tax law (including tax rates) in the period that the change is enacted. Adjustments are recorded in the appropriate deferred income tax balance sheet accounts (Accounts 190, 281, 282

and 283) based on the nature of the temporary difference and the related classification requirements of the accounts. If as a result of action or expected action by a regulator, it is probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, a regulatory asset or liability is recognized in Account 182.3 (Other Regulatory Assets), or Account 254 (Other Regulatory Liabilities), as appropriate, for that probable future revenue or reduction in future revenue. The amortization of deficient and excess deferred income taxes that will be recovered from or passed through to customers through future rates will be recorded in FERC Accounts 410.1 (Provision for Deferred Income Taxes, Utility Operating Income) and 411.1 (Provision for Deferred Income Taxes—Credit, Utility Operating Income), as appropriate. Re-measurements of deferred tax balance sheet accounts may also result in re-measurements of tax-related regulatory assets or liabilities that had been recorded prior to the change in tax law. If it is not probable that the effect of a future increase or decrease in taxes payable resulting from a change in tax law or rates will be recovered from or passed through to customers through future rates, tax expense will be recognized in Account 410.2 (Provision for Deferred Income Taxes, Other Income or Deductions) or tax benefit is recognized in Account 411.2 (Provision for Deferred Income Taxes-Credit, Other Income or Deductions), as appropriate.

2. For deficient and (excess) accumulated deferred income taxes (ADIT) related to change(s) to income tax rates occurring after September 30, 2018, insert calculations that support the re-measurement amount delineated by categroy (i.e., protected property, unprotected property, and unprotected non-property).

3. Set the allocation percentages equal to the applicable percentages at the date of the rate change.

Notes

A Categorization of items as protected or non-protected will remain as originally agreed, absent a change in guidance from the Internal Revenue Service (IRS) with respect to that items. Balances associated with the tax rate change will not be adjusted (except for amortization each year) absent audit adjustments, tax return amendments, or a change in IRS guidance. Any resulting changes will be prominently disclosed including the basis for the change.

B The allocation percentage in Column T are based on the applicable percentages at the date of the rate change and must remain fixed absent the Commission's express approval.

END

Commonwealth Edison Company					
Attachment 2 - Taxes Other Than Income Worksheet					
			Page 263		Allocated
Other Taxes			Col (i)	Allocator	Amount
	Plant Related			**Net Plant Allocator**	
1		Real Estate			
2		Illinois Use Tax on Purchases			
3		Vehicle Use			
4		State Franchise Tax			
5		Chicago Use			
6		Chicago Transaction			
7		Chicago Dark Fiber Rev. Tax			
8	**Total Plant Related**			%	
	Labor Related			**Wages & Salary Allocator**	
9		Unemployment & state unemployment			
10		FICA			
11		City of Chicago			
12					
13					
14	**Total Labor Related**			%	
	Other Included			**Net Plant Allocator**	
15					
16					
17					
18					
19	**Total Other Included**			%	
20	**Total Included (Lines 8 + 14 + 19)**				
	Currently Excluded				
21		Electricity Excise Tax			
22		Rider 21 Low Income Assistance			
23		Rider 21 Renewable			
24		Electricity Distribution			
25		Infrastructure Tax			

26		Municipal Utility				
27		Public Utility Fund				
28		**Subtotal, Excluded**				
29	**Total, Included and Excluded (Line 20 + Line 28)**					
30	**Total Other Taxes from p114.14.c**					
31		Difference (Line 29 - Line 30)		-		
	<u>Criteria for Allocation:</u>					
	A	Other taxes that are incurred through ownership of plant including transmission plant will be allocated based on the Gross Plant				
		Allocator. If the taxes are 100% recovered at retail they shall not be included.				
	B	Other taxes that are incurred through ownership of only general or intangible plant will be allocated based on the Wages and Salary				
		Allocator. If the taxes are 100% recovered at retail they shall not be included.				
	C	Other taxes that are assessed based on labor will be allocated based on the Wages and Salary Allocator.				
	D	Other taxes except as provided for in A, B and C above, that are incurred and (1) are not fully recovered at retail or (2) are				
		directly or indirectly related to transmission service will be allocated based on the Gross Plant Allocator; provided, however, that				
		overheads shall be treated as in footnote B above.				
	E	Excludes prior period adjustments in the first year of the formula's operation and reconciliation for the first year.				

	Commonwealth Edison Company		
	Attachment 3 - Revenue Credit Workpaper		
	Accounts 450 & 451		
1	Late Payment Penalties Allocated to Transmission		
	Account 454 - Rent from Electric Property		
2	Rent from Electric Property - Transmission Related		
	Account 456 - Other Electric Revenues (Note 1)		
3	Transmission for Others (Note 3)		
4	Schedule 1A		
5	Net revenues associated with Network Integration Transmission Service (NITS) for which the load is not included in the divisor (difference between NITS credits from PJM and PJM NITS charges paid by Transmission Owner) (Note 3)		
6	Point to Point Service revenues for which the load is not included in the divisor received by Transmission Owner		-
7	PJM Transitional Revenue Neutrality (Note 1)		
8	PJM Transitional Market Expansion (Note 1)		
9	Professional Services		-
10	Revenues from Directly Assigned Transmission Facility Charges (Note 2)		
11	Rent or Attachment Fees associated with Transmission Facilities		-
12	Gross Revenue Credits	(Sum Lines 1-11)	-
13	Amount offset from Note 3 below		
14	Total Account 454 and 456		
15	Note 1: All revenues related to transmission that are received as a transmission owner (i.e., not received as a LSE), for which the cost of the service is recovered under this formula, except as specifically provided for elsewhere in this Attachment or elsewhere in the formula will be included as a revenue credit or included in the peak on line 174 of Appendix A.		
16	Note 2: If the costs associated with the Directly Assigned Transmission Facility Charges are included in the Rates, the associated revenues are included in the Rates. If the costs associated with the Directly Assigned Transmission Facility Charges are not included in the Rates, the associated revenues are not included in the Rates.		
17	Note 3: If the facilities associated with the revenues are not included in the formula, the revenue is shown here, but not included in the total above and explained in the Cost Support. For example revenues associated with distribution facilities. In addition Revenues from Schedule 12 are not included in the total above to the extent they are credited under Schedule 12.		

Commonwealth Edison Company
Attachment 4 – Calculation of 100 Basis Point Increase in ROE

	Return and Taxes with 100 Basis Point increase in ROE			
A	100 Basis Point increase in ROE and Income Taxes		Line 30 + Line 42 from below	
B	100 Basis Point increase in ROE			1.00%
Return Calculation				
			Appendix A Line or Source Reference	
1	**Rate Base**		(Line 41 + Line 54)	
	Long Term Interest			
2	Long Term Interest		Attachment 5	
3	Less LTD Interest on Securitization Bonds		Attachment 8	
4	Long Term Interest		(Line 99 - Line 100)	
5	**Preferred Dividends**	enter positive	p118.29.c	
	Common Stock			
6	Proprietary Capital		p112.16.c	
7	Less Accumulated Other Comprehensive Income Account 219		p112.15.c	
8	Less Preferred Stock		(Line 114)	
9	Less Account 216.1		p112.12.c	
10	Common Stock		(Line 103 - 104 - 105 - 106)	
	Capitalization			
11	Long Term Debt		p112.18-21.c	
12	Less Loss on Reacquired Debt		p111.81.c	
13	Plus Gain on Reacquired Debt		p113.61.c	
14	Less ADIT associated with Gain or Loss		Attachment 1	
15	Less LTD on Securitization Bonds		Attachment 8	
16	Total Long Term Debt		(Line 108 - 109 + 110 - 111 - 112)	
17	Preferred Stock		p112.3.c	
18	Common Stock		(Line 107)	
19	Total Capitalization		(Sum Lines 113 to 115)	
20	Debt %	Total Long Term Debt	(Line 113 / Line 116)	%
21	Preferred %	Preferred Stock	(Line 114 / Line 116)	%
22	Common %	Common Stock	(Line 115 / Line 116)	%
23	Debt Cost	Total Long Term Debt	(Line 101 / Line 113)	
24	Preferred Cost	Preferred Stock	(Line 102 / Line 114)	
25	Common Cost	Common Stock	(Line 122 + 100 basis points)	12.5%
26	Weighted Cost of Debt	Total Long Term Debt (WCLTD)	(Line 117 * Line 120)	
27	Weighted Cost of Preferred	Preferred Stock	(Line 118 * Line 121)	

Line		Description			Reference		Value
28		Weighted Cost of Common		Common Stock	(Line 119 * Line 122)		
29		**Rate of Return on Rate Base (ROR)**			**(Sum Lines 123 to 125)**		
30		**Investment Return = Rate Base * Rate of Return**			**(Line 55 * Line 126)**		
C o m p o s i t e I n c o m e T a x e s							
		Income Tax Rates					
31		FIT=Federal Income Tax Rate		**(Note I from Appendix A)**			%
32		SIT=State Income Tax Rate or Composite		**(Note I from Appendix A)**			%
33		p = percent of federal income tax deductible for state purposes			Per State Tax Code		%
34		T		T=1 - {[(1 - SIT) * (1 - FIT)] / (1 - SIT * FIT * p)} =			%
35		CIT = T / (1-T)					%
36		Tax Gross-Up Factor	1 / (1-T)				
		ITC Adjustment		**(Note U from Appendix A)**			
37		Investment Tax Credit Amortization		enter negative	Attachment 1A - ADIT		-
38		Tax Gross-Up Factor			(Line 36)		%
39		Net Plant Allocation Factor			(Line 14)		%
40		**ITC Adjustment Allocated to Transmission**			(Line 37 * 38 * 39)		
		Other Income Tax Adjustment					
41		Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense		**(Note R from Appendix A)**	Attachment 5, Line 136a		
42		Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component		**(Note R from Appendix A)**	Attachment 5, Line 136b		
43		Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component		**(Note R from Appendix A)**	Attachment 5, Line 136c		
44		Amortization of Other Flow-Through Items - Transmission Component		**(Note R from Appendix A)**	Attachment 5, Line 136d		
45		Other Income Tax Adjustments - Expense / (Benefit)			Line 41 + 42 + 43 + 44		
46		1Tax Gross-Up Factor			Line 36		%
47		Other Income Tax Adjustment			Line 136e*136f		
41		**Income Tax Component =**		CIT=(T/1-T) * Investment Return * (1-(WCLTD/R)) =	[Line 35 * Line 30 * (1- (Line 26 / Line 29))]		
42		**Total Income Taxes**			**(Line 40 +Line 47 + Line 48))**		-

Commonwealth Edison Company
Attachment 5 - Cost Support

Electric / Non-electric Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Electric Portion		Details
	Plant Allocation Factors							
8	Accumulated Amortization		(Note A)	p200.21.c				
	General Plant Direct Assignment of Account 397					DA to Trans.		
26	Account No. 397 Directly Assigned to Transmission			**p207.94.g**				Assignment based on locational analysis performed pursuant to protocol 1.g.iii.7.v and detailed in Attachment accompanying Annual Update Filing.
	Accumulated Depreciation and Amortization							
32	Less: Amount of General Depreciation Associated with Acct. 397			P219.28c (footnote)				
	Materials and Supplies							
45	Undistributed Stores Expense		(Note A)	p227.6.c & 15.c				
	Allocated General & Common Expenses							
60	Plus Transmission Lease Payments		(Note A)	p200.4.c				
	Depreciation Expense							
88	Amount of General Depreciation Expense Associated with Acct. 397			**p337.43.b*e**				Acct. 397 Depreciable Plant Balance times Depreciation Rate

Transmission / Non-transmission Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Form 1 Amount	Transmission Related	Non-transmission Related	Details
28		**Plant Held for Future Use (Including Land)**		(Note C)	p.214				
									Note: At each annual update, company will provide for each parcel of land a description of its intended use within a 15 year period.

CWIP & Expensed Lease Worksheet

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	CWIP In Form 1 Amount	Expensed Lease in Form 1 Amount	Details
	Plant Allocation Factors							

6	Electric Plant in Service		(Note B)	p207.104.g				
	Plant In Service							
15	Transmission Plant In Service		(Note B)	p207.58.g				
	Accumulated Depreciation							
30	Transmission Accumulated Depreciation		(Note J)	p219.25.c				

EPRI Dues Cost Support

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	EPRI Dues		Details
	Allocated General & Common Expenses							
70	Less EPRI Dues		(Note D)	p352 & 353				

Adjustments to A & G Expense

Attachment A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions			Total	Adjustment	Adjusted Total	Details
	Allocated General & Common Expenses					
62	Total A&G	**p.323.197.b**				Adjust to remove lobbying expense, if any.
63	Fixed PBOP expense	Company Records	7,818,071			
64	Actual PBOP expense	p.320.198.b (footnote)				Current year actual PBOP expense
65	Salaries and Benefits of specified Exelon Corp top executives	Company Records				Elective adjustment to certain payroll and benefit costs of Exelon Corp's senior executive team.
66	Power Procurement Expense	p.320.198.b (footnote)				

Regulatory Expense Related to Transmission Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Transmission Related	Non-transmission Related	Details
	Directly Assigned A&G							
74	Regulatory Commission Exp Account 928		(Note G)	**p350-351.h**				Transmission-related = all FERC dockets per p.350-351, excl. FERC annual charge. Includes allocated portion of regulatory costs for issuing debt.

Safety Related Advertising Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Form 1 Amount	Safety Related	Non-safety Related	Details
	Directly Assigned A&G							

78	General Advertising Exp Account 930.1		(Note F)	p323.191.b			-	

MultiState Workpaper

	Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				State 1	State 2	State 3	State 4	State 5	Details
	Income Tax Rates									
					IL					
129	SIT=State Income Tax Rate or Composite		(Note I)							

Education and Out Reach Cost Support

	Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Form 1 Amount	Education & Outreach	Other	Details
	Directly Assigned A&G							
75	General Advertising Exp Account 930.1		(Note K)	p323.191.b	-		-	-

Excluded Plant Cost Support

		Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Excluded Transmission Facilities	Description of the Facilities
		Adjustment to Remove Revenue Requirements Associated with Excluded Transmission Facilities					
149		Excluded Transmission Facilities		(Note M)			**General Description of the Facilities**
		Instructions:				**Enter $**	
	1	Remove all investment below 69 kV or generator step up transformers included in transmission plant in service that are not a result of the RTEP Process					
	2	If unable to determine the investment below 69kV in a substation with investment of 69 kV and higher as well as below 69 kV,				**Or**	
		the following formula will be used:	**Example**			**Enter $**	
	A	Total investment in substation	1,000,000				
	B	Identifiable investment in Transmission (provide workpapers)	500,000				
	C	Identifiable investment in Distribution (provide workpapers)	400,000				
	D	Amount to be excluded (A x (C / (B + C))	444,444				
							Add more lines if necessary

Prepayments and Prepaid Pension Asset

		Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions				Description of the Prepayments
44	**Prepayments**			W&S Allocator		
		Prepayments	-	0.000%	-	FERC Form 1 – **p111.57.c**
82	**Prepaid Pension Asset**					
		Prepaid Pension Asset (not to be included in Prepayments)	-			Stockholder contributed portion iss shown on FERC Form 1 - p233.25.f Note: Attachment 1 excludes from transmission rate base the associated ADIT balance.
		Less ADIT	-			

		Net Prepaid Pension Asset	-	0.000%	-	

Outstanding Network Credits Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Outstanding Network Credits	Description of the Credits			
	Network Credits					Enter $				
53		Outstanding Network Credits			(Note N)					
							Total			
							Add more lines if necessary			

Adjustments to Transmission O&M

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Total	LSE Adjustment	Transmission Related	Details
56		Transmission O&M			p321.112.b			0	Acct. 566 adjusted, and Accts. 561.4 and 561.8 included to remove PJM LSE expenses not recoverable in ComEd's OATT rate.
									See FERC Form 1, footnote to p320.97b.
57		Less Account 565			p321.96.b		0	0	Transmission related 565 is to include the TX revenue requirement of ComEd of Indiana

Interest Expense Adjustment

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						Long Term Interest per Form 1	Amortization related to Interest Rate Swaps*	Total Long Term Interest	Details
	Adjustment to Amortize Losses Associated with Interest Rate Swaps								
99		Long Term Interest			p117.62-67.c				The amortization of Series 98 to 102 Rate Swaps is included in Long Term Debt FERC Acct 427

Interest on Outstanding Network Credits Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Interest on Network Credits	Description of the Interest on the Credits
	Revenue Credits & Interest on Network Credits					
155	Interest on Network Credits		(Note N)	Company Records		
						Add more lines if necessary

Facility Credits under Section 30.9 of the PJM OATT

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions					Amount	Description & PJM Documentation
	Net Revenue Requirement					
171	Facility Credits under Section 30.9 of the PJM OATT				-	

PJM Load Cost Support

Appendix A Line #s, Descriptions, Notes, Form 1 Page #s and Instructions						1 CP Peak	Description & PJM Documentation
	Network Zonal Service Rate						
173		1 CP Peak		(Note L)	PJM Data		

Statements BG/BH (Present and Proposed Revenues)

	Customer	Billing Determinants	Current Rate	Proposed Rate	Current Revenues	Proposed Revenues	Change in Revenues				
					-	-	-				
	Note: ComEd does not have billing determinants of its wholesale customers. This is confidential information in the possession of PJM Interconnection, LLC.										
	Total				-	-	-				

Other Income Tax Adjustments

Line	Component Descriptions	Instruction References	Transmission Depreciation Expense Amount		Tax Rate from Attachment H-13A, Line 131		Amount to Attachment H-13A,Line 136e
136a	Tax Adjustment for AFUDC Equity Component of Transmission Depreciation Expense	Instr. 1, 2, 3 below	$	X		=	$
	Amortization of Deficient /(Excess) Deferred Taxes - Transmission Component						
136b	Amortization Deficient / (Excess) Deferred Taxes (Federal) - Transmission Component	Instr. 4 below					
136c	Amortization Deficient / (Excess) Deferred Taxes (State) - Transmission Component	Instr. 4 below					
136d	Amortization of Other Flow-Through Items - Transmission Component	Instr. 5 below					(70,762)
136e	**Total Other Income Tax Adjustments - Expense / (Benefit)**						$ (

Instr. #s | Instructions

Inst. 1	Transmission Depreciation Expense is the gross cumulative amount based upon tax records of capitalized AFUDC equity embedded in the gross plant attributable to the transmission function multiplied by the Capital Recovery Rate (described in Instruction 2).
Inst. 2	Capital Recovery Rate is the book depreciation rate applicable to the underlying plant assets.
Inst. 3	"AFUDC Equity" category reflects the nondeductible component of depreciation expense related to the capitalized equity portion of Allowance for Funds Used During Construction (AFUDC).
Inst. 4	Upon enactment of changes in tax law, accumulated deferred income taxes are re-measured and adjusted in the Company's books of account, resulting in deficient or (excess) accumulated deferred income taxes (ADIT). Such deficient or (excess) ADIT attributed to the transmission function will be based upon tax records and calculated in the calendar year in which the deficient or (excess) amount was measured and recorded for financial reporting purposes. See Attachment 1B - ADIT Amortization, Column G, Line 31 and Line 79 for additional information and support for the current year amortization. The current year amortization of deficient and (excess) ADIT is recorded in FERC Accounts 410.1 and 411.1.
Inst. 5	Other Flow-Through Items - In the past regulatory agencies required certain federal and state income tax savings resulting from temporary differences between the amount of taxes computed for ratemaking purposes and taxes on the amount of actual current federal income tax liability to be immediately "flowed through" rates for certain assets. The "flow-through" savings were accounted for in deferred tax balances, based on the expectation and understanding that while tax savings would be immediately flowed through to ratepayers, the flow-through expense incurred when the temporary differences reverse would be recovered from ratepayers. The "Amortization of Other Flow-Through Items" represents the transmission portion of tax expense relating

to the reversal of these temporary differences. The Other Flow-Through balance as of September 30, 2018 will reverse beginning October 1, 2018 based on the prescribed periods.

Commonwealth Edison Company
Attachment 6 - Estimate and Reconciliation Worksheet

Step	Month	Year	Action

Exec Summary

Step	Month	Year	Action
1	April	Year 2	TO populates the formula with Year 1 data
2	April	Year 2	TO estimates all transmission Cap Adds for Year 2 weighted based on Months expected to be in service in Year 2
3	April	Year 2	TO adds weighted Cap Adds to plant in service in Formula (Appendix A, Line 17)
4	May	Year 2	Post results of Step 3 on PJM web site
5	June	Year 2	Results of Step 3 go into effect
6	April	Year 3	TO populates the formula with Year 2 data
7	April	Year 3	TO estimates all transmission Cap Adds during Year 3 weighted based on Months expected to be in service in Year 3
8	April	Year 3	Reconciliation - TO calculates Reconciliation by removing from Year 2 data - the total Cap Adds placed in service in Year 2 and adding weighted average in Year 2 Cap Adds in Reconciliation (adjusted to include any Reconciliation amount from prior year).
9	April	Year 3	Reconciliation - TO adds the difference between the Reconciliation in Step 8 and the forecast in Line 5 with interest to the result of Step 7 (this difference is also added to Step 8 in the subsequent year)
10	May	Year 3	Post results of Step 9 on PJM web site
11	June	Year 3	Results of Step 9 go into effect

Reconciliation Details

Step	Month	Year							
1	April	Year 2	TO populates the formula with Year 1 data						
					Rev Req based on Year 1 data	Must run Appendix A to get this number (without any cap adds in Appendix A, line 17)			
2	April	Year 2	TO estimates all transmission Cap Adds for Year 2 weighted based on Months expected to be in service in Year 2						
						Time Weighted Amounts			
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12		
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments		
		Dec Balance			12				
		Jan			11.5				
		Feb			10.5				
		Mar			9.5				
		Apr			8.5				
		May			7.5				
		Jun			6.5				
		Jul			5.5				
		Aug			4.5				
		Sep			3.5				
		Oct			2.5				
		Nov			1.5				
		Dec			0.5				
		Total	-	-				Total	
						0.0000		Average Months [total column (D)/ total column (A)*12]	
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line 17 of Appendix A
		CWIP (weighted monthly balances)						Total Column E	To line 43 of Appendix A
3	April	Year 2							
4	May	Year 2	Post results of Step 3 on PJM web site						
			$			Must run Appendix A to get this number (with prospective weighted cap adds in Appendix A, line 17)			
5	June	Year 2	Results of Step 3 go into effect						
6	April	Year 3	TO populates the formula with Year 2 data						
					Rev Req based on Prior Year data	Must run Appendix A to get this number (without any cap adds in Appendix A, line 17)			
7	April	Year 3	TO estimates all transmission Cap Adds during Year 3 weighted based on Months expected to be in service in Year 3						
						Time Weighted Amounts			
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12		
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments		
		Dec Balance			12				
		Jan			11.5				
		Feb			10.5				
		Mar			9.5				
		Apr			8.5				
		May			7.5				
		Jun			6.5				
		Jul			5.5				
		Aug			4.5				
		Sep			3.5				
		Oct			2.5				
		Nov			1.5				
		Dec			0.5				
		Total	-	-				Total	
								Average Months [total column (D)/ total column (A)*12]	
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line 17 of Appendix A
		CWIP (weighted monthly balances)						Total Column E	To line 43 of Appendix A
		New Transmission Plant Additions for Year 2 (weighted by months in service)							
8	April	Year 3	Reconciliation - TO calculates Reconciliation by removing from Year 2 data - the total Cap Adds placed in service in Year 2 and adding weighted average in Year 2 Cap Adds in Reconciliation (adjusted to include						

			any Reconciliation amount from prior year).								
			Remove all Cap Adds placed in service in Year 2								
			For Reconciliation only - remove actual New Transmission Plant Additions for Year 2							- $ < Input to Appendix A, Line16	
			Add weighted Cap Adds actually placed in service in Year 2								
						Time Weighted Amounts					
			(A)	(B)	(C)	(D) = (A) * (C)/12	(E) = (B) * (C)/12				
			Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments	Weighting	Other Projects PIS (Monthly change in balance)	Grand Prairie CWIP EOY Balance and Increments				
		Dec Balance			12						
		Jan			11.5						
		Feb			10.5						
		Mar			9.5						
		Apr			8.5						
		May			7.5						
		Jun			6.5						
		Jul			5.5						
		Aug			4.5						
		Sep			3.5						
		Oct			2.5						
		Nov			1.5						
		Dec			0.5						
		Total						Total			
								Average Months [total column (D)/ total column (A)*12]			
		New Transmission Plant Additions for Year 2 (weighted by months in service)						Total Column D	To line of Appendix A		
		CWIP (weighted monthly balances)						Total Column E	To line of Appendix A		
					Result of Formula for Reconciliation		Must run Appendix A with cap adds in Appendix A, line 16 & line 17				
					(Year 2 data with total of Year 2 Cap Adds removed and monthly weighted average of Year 2 Cap Adds added in)						

9	April	Year 3	Reconciliation - TO adds the difference between the Reconciliation in Step 8 and the forecast in Line 5 with interest to the result of Step 7 (this difference is also added to Step 8 in the subsequent year)								
			The Reconciliation in Step 8			The forecast in Prior Year					
			$ -			$ -					
			Interest on Amount of Refunds or Surcharges								
			Interest 35.19a for March Current Yr								
			Month	Yr		1/12 of Step 9	Interest 35.19a for March Current Yr		Months	Interest	Surcharge (Refund) Owed
			Jun	Year 1			%		11.5		
			Jul	Year 1			%		10.5		
			Aug	Year 1			%		9.5		
			Sep	Year 1			%		8.5		
			Oct	Year 1			0.0000%		7.5		
			Nov	Year 1			0.0000%		6.5		
			Dec	Year 1			0.0000%		5.5		
			Jan	Year 2			0.0000%		4.5		
			Feb	Year 2			0.0000%		3.5		
			Mar	Year 2			0.0000%		2.5		
			Apr	Year 2			0.0000%		1.5		
			May	Year 2			0.0000%		0.5		
			Total								
						Balance	Interest		Amort	Balance	
			Jun	Year 2			0.0000%				
			Jul	Year 2			0.0000%				
			Aug	Year 2			0.0000%				
			Sep	Year 2			0.0000%				
			Oct	Year 2			0.0000%				
			Nov	Year 2			0.0000%				
			Dec	Year 2			0.0000%				
			Jan	Year 3			0.0000%				
			Feb	Year 3			0.0000%				
			Mar	Year 3			0.0000%				
			Apr	Year 3			0.0000%				
			May	Year 3			0.0000%				
			Total with interest								
			The difference between the Reconciliation in Step 8 and the forecast in Prior Year with interest								
			Total True-Up Amount								
			Rev Req based on Year 2 data with estimated Cap Adds for Year 3 (Step 8)						$		
			Revenue Requirement for Year 3								
10	May	Year 3	Post results of Step 9 on PJM web site								
			$	Post results of Step 3 on PJM web site							
11	June	Year 3	Results of Step 9 go into effect								
			$ -								

Attachment 7 - Transmission Enhancement Charge Worksheet

1		New Plant Carrying Charge		
2		**Fixed Charge Rate (FCR) if not a CIAC**		
			Formula Line	
3		A	160	Net Plant Carrying Charge without Depreciation
4		B	167	Net Plant Carrying Charge per 100 Basis Point in ROE without Depreciation
5		C		Line B less Line A
6		**FCR if a CIAC**		
7		D	161	Net Plant Carrying Charge without Depreciation, Return, nor Income Taxes
8		**The FCR resulting from Formula in a given year is used for that year only.**		
9		**Therefore actual revenues collected in a year do not change based on cost data for subsequent years**		

10		Details		**West Loop 345 kV (100% CWIP)**				**West Loop Plant in Service**														
11	"Yes" if a project under PJM OATT Schedule 12, otherwise "No"	Schedule 12	(Yes or No)																			
12	Useful life of the project	Life																				
13	"Yes" if the customer has paid a lumpsum payment in the amount of the investment on line 29, Otherwise "No"	CIAC	(Yes or No)																			
14	Input the allowed increase in ROE	Increased ROE (Basis Points)																				
15	From line 3 above if "No" on line 13 and From line 7 above if "Yes" on line 13	11.5% ROE		%				%				%										
16	(Line 14/100 times line 5) + Line 15	FCR for This Project		%				%				%										
17	Project subaccount of Plant in Service Account 101 or 106 if not yet classified	Investment																				
18	Line 17 divided by line 12	Annual Depreciation Exp			-				-													
19	Month in which project is placed in service (e.g. Jan=1)	In Service Month (1-12)																				
20			**Invest Yr**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Beginning**	**Depreciation**	**Ending**	**Revenue**	**Total**	**Incentive Charged**	**Revenue Credit**
21		W 11.5 % ROE	2007																	$		$
22		W Increased ROE	2007																	$	$	
23		W 11.5 % ROE	2008																	$		$
24		W Increased ROE	2008																	$	$	
25		W 11.5 % ROE	2009																	$		$
26		W Increased ROE	2009																	$	$	
27		W 11.5 % ROE	2010																	$		$
28		W Increased ROE	2010																	$	$	
29		W 11.5 % ROE	2011																	$		$
30		W Increased ROE	2011																	$	$	
31		W 11.5 % ROE	2012																	$		$
32		W Increased ROE	2012																	$	$	
33		W 11.5 % ROE	2013																	$		$
34		W Increased ROE	2013																	$	$	
35		W 11.5 % ROE	2014																	$		$
36		W Increased ROE	2014																	$	$	
37		W 11.5 % ROE	2015																	$		$
38		W Increased ROE	2015																	$	$	
39		W 11.5 % ROE	2016																	$		$
40		W Increased ROE	2016																	$	$	
41		W 11.5 % ROE	2017																	$		$
42		W Increased ROE	2017																	$	$	
43		W 11.5 % ROE	2018																	$		$
44		W Increased ROE	2018																	$	$	
45		W 11.5 % ROE	2019																	$		$
46		W Increased ROE	2019																	$	$	
47		W 11.5 % ROE	2020																	$		$
48		W Increased ROE	2020																	$	$	
49		W 11.5 % ROE	2021																	$		$
50		W Increased ROE	2021																	$	$	
51		W 11.5 % ROE	2022																	$		$
52		W Increased ROE	2022																	$	$	
53		W 11.5 % ROE	2023																	$		$
54		W Increased ROE	2023																	$	$	
55		W 11.5 % ROE	2024																	$		$
56		W Increased ROE	2024																	$	$	
57		W 11.5 % ROE	2025																	$		$
58		W Increased ROE	2025																	$	$	
59		W 11.5 % ROE	2026																	$		$
60		W Increased ROE	2026																	$	$	
61			....					....		.....	....	....	....	.....	....	....	....	.....	....			$
62			....					....	.....	.....	....	....	.....	.....	....	....	.....	.....	....		$	

On the formulas used in the Columns for lines 22+ are as follows

For Plant in service: (first year means first year the project is placed in service)

"Beginning" is the investment on line 17 for the first year and is the "Ending" for the prior year after the first year

"Depreciation" is the annual depreciation in line 18 divided by twelve times the difference of thirteen minus line 19 in the first year and line 18 thereafter if "no" on line 13. "Depreciation" is "0" (zero) if "Yes" on line 13

"Ending" is "Beginning" less "Depreciation"

Revenue is "Ending" times line 16 for the current year times the quotient line 19 divided by 13 plus "Depreciation" for the first year and "Ending" times line 16 plus "Depreciation" thereafter

For CWIP:

Beginning is the line 17 for that year

Depreciation is not used

Ending is the same as Beginning

Revenue is Ending times line 16 for the current year

Commonwealth Edison Company

Attachment 8 - Company Exhibit - Securitization Workpaper

Line #					
		Long Term Interest			
100		**Less LTD Interest on Securitization Bonds**			
		Capitalization			
112		**Less LTD on Securitization Bonds**			
		Calculation of the above Securitization Adjustments			

Commonwealth Edison Company

Attachment 9 - Depreciation Rates

Plant Type	Applied Deprec. Rate (%)
Transmission[1]	2.53
General and Intangible Plant	
Account 390: Structures and Improvement	2.60
Account 391.01: Office Furniture & Equipment: Office Machines	10.00
Account 391.02: Office Furniture & Equipment: Furniture/Equipment	6.67
Account 391.03: Office Furniture & Equipment: Computer Equipment	19.99
Account 392.00: Transportation Equipment - Passenger Cars	10.92
Account 392.01: Transportation Equipment -Tractor Trucks	1.24
Account 392.02: Transportation Equipment –Trailers	4.41
Account 392.05: Transportation Equipment - Trucks < 13,000 pounds	7.45
Account 392.06: Transportation Equipment - Trucks >= 13,000 pounds	5.86
Account 393: Stores Equipment	6.67
Account 394: Tools, Shop, & Garage Equipment	4.00
Account 395: Laboratory Equipment	6.67
Account 396: Power Operated Equipment	6.63
Account 397: Communications Equipment	7.33
Account 397.01: Communications Equipment: Mesh Comm. Network Devices	11.00
Account 397.02: Communications Equipment: Smart Street Lights	9.17
Account 397.,03: Communications Equipment: SCADA, Fiber Optic, and Microwave Equipment	2.27
Account 398: Miscellaneous Equipment	6.67
Account 303: Miscellaneous Intangible Plant	10.30

[1] ComEd applies a single composite depreciation rate to Transmission Plant. The composite rate is determined by calculating the weighted average rate of Accounts 350-359. Within five years of the effective date of the Settlement in Docket No ER19-5 et al, and at least every five years thereafter,ComEd will file an FPA Section 205 rate proceeding to revise its depreciation rates (unless the company has otherwise submitted an FPA Section 205 rate filing that addresses its depreciation rates in the prior five years).