

THE CITY OF PHILADELPHIA  
STATEMENT NO. 1  
(REVISED)

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Exs KRM-1-3

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOINT APPLICATION OF PECO ENERGY :  
COMPANY AND PUBLIC SERVICE :  
ELECTRIC & GAS COMPANY FOR :  
APPROVAL OF THE MERGER OF :  
PUBLIC SERVICE ENTERPRISE :  
GROUP, INC., WITH AND INTO :  
EXELON CORPORATION :

DOCKET NO. A-110550F0160

DOCUMENT  
FOLDER

RECEIVED

SEP 26 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

DIRECT TESTIMONY AND  
EXHIBITS  
OF  
KENT R. MILLER

ON BEHALF OF

THE CITY OF PHILADELPHIA

REGARDING MARKET POWER, RELIABILITY,  
ENERGY EFFICIENCY, AND CORPORATE PRESENCE

JUNE 2005

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT APPLICATION OF PECO ENERGY :  
COMPANY AND PUBLIC SERVICE :  
ELECTRIC & GAS COMPANY FOR :  
APPROVAL OF THE MERGER OF : DOCKET NO. A-110550F0160  
PUBLIC SERVICE ENTERPRISE :  
GROUP, INC., WITH AND INTO :  
EXELON CORPORATION :**

**DIRECT TESTIMONY AND EXHIBITS OF KENT R. MILLER  
ON BEHALF OF THE CITY OF PHILADELPHIA**

1 **Q. Please state your name and position.**

2 A. My name is Kent R. Miller. I am Executive Director of the Municipal Energy Office of  
3 The City of Philadelphia ("City").

4  
5 **Q. What is your educational experience?**

6 A. I received a B.A. in Economics from Denison University in 1963. I received a Ph.D. in  
7 Energy Management and Policy from the University of Pennsylvania in 1992.

8  
9 **Q. What is your employment experience?**

10 A. I began working for the City of New York in approximately 1992 as a Senior Policy  
11 Analyst in the Department of Telecommunications and Energy. Over the course of  
12 several years, my positions included Executive Director of New York City Utility Service  
13 and Director of Energy Planning. During this time, I was involved in a number of rate  
14 cases involving Consolidated Edison and Brooklyn Union Gas, including the

1 restructuring of both utilities. In 1998, I began working for the City of Philadelphia as  
2 Executive Director of the Municipal Energy Office.

3  
4 **Q. What are your responsibilities in this position?**

5 A. The Energy Office is responsible for managing the City's energy use, including both  
6 supply acquisition and demand reduction programs. I was a member of the City's  
7 negotiating team in the merger of PECO Energy Company ("PECO" or "Company") with  
8 Unicom.

9  
10 **Q. Are you familiar with the history of the City's relationship with PECO?**

11 A. Yes, at least in recent years. Until relatively recently, PECO was known as the  
12 Philadelphia Electric Company. It has long been a major employer and taxpayer in the  
13 City, and has also been an important source of charitable and civic contributions to the  
14 City and for the benefit of City residents.

15  
16 **Q. How much electricity does the City purchase from PECO?**

17 A. The City uses about 94 megawatts of electric power from PECO, including about 30 for  
18 the Water Department, 22 for Philadelphia International Airport, 12 for streetlighting, and  
19 30 for other miscellaneous City accounts. I believe we are still PECO's largest or second-  
20 largest customer.

21  
22 **Q. What concerns do you have about the proposed acquisition of Public Service**  
23 **Enterprise Group ("PSEG") by Exelon Corporation ("Exelon")?**

1 A. I have four general concerns. First, the merged company may have increased market  
2 power, even with the proposed generation divestiture, in the wholesale electricity market,  
3 and perhaps in the gas market, which would raise prices for utility customers inside and  
4 outside the City. The potential impact on and in the City would likely be very difficult to  
5 manage. Utility price increases lead to increased burdens on poor and working class  
6 people and, ultimately, increased demands on City services.

7  
8 My second general concern relates to our inability to obtain information and assurances  
9 from PECO sufficient to determine whether our experiences indicate serious problems in  
10 PECO's maintenance and replacement of its infrastructure. The substantial development  
11 ongoing and planned in the City raises our concerns for reliability.

12  
13 Third, the proposal does not demonstrate that the merger will affirmatively promote the  
14 service, convenience, or safety of the public in a substantial way. For example, PECO's  
15 assertion that it will improve its operations by sharing best practices from Public Service  
16 Electric & Gas Company ("PSE&G") is too vague and of non-quantifiable, immeasurable  
17 value since the Company has not specifically identified any such prices or benefits that  
18 would provide enhanced service to PECO customers.

19  
20 Finally, if PECO's corporate presence were not maintained or enhanced, including local  
21 control, employment, charitable giving and civic involvement, the merger would harm  
22 the public interest.

23

1    **Q.    Why do you believe the merger may create a market power issue?**

2    A.    Our concern about market power begins with the market monitor observations of PJM  
3    Interconnection ("PJM") in its "2004 State of the Market Report" at 21 that market power  
4    is endemic to the structure of the PJM capacity markets. Since both PECO and PSE&G  
5    are major players in the capacity markets as separate and competing firms, the potential  
6    for manipulative pricing is likely to increase with the merger. I realize that this is a  
7    complex, technical issue, which can be viewed from several perspectives, but the  
8    companies are not disinterested in the outcome, so we believe the Pennsylvania Public  
9    Utility Commission ("PUC" or "Commission") has an affirmative responsibility to  
10   conduct an independent analysis. Furthermore, even were the effects of the merger  
11   neutralized by some level of proposed divestiture, the problem noted by the PJM market  
12   monitor would remain, and PECO/Exelon's generation holdings are part of that problem.  
13   Considering the potential financial harm to ratepayers if the merged company increases  
14   its influence on prices, which likely would not be known immediately if at all, we think it  
15   is reasonable to ask the Commission to delay a decision on the merger until the market  
16   monitor has sufficient data and information to confirm or refute the proposition that this  
17   merger will increase the market power capacity concentration in PJM.

18

19   **Q.    What are the City's reliability concerns?**

20   A.    Center City Philadelphia experienced at least two large blackouts in the past two years,  
21   one on August 12, 2003, that affected 24,374 customers and lasted 1,730 minutes (29½  
22   hours) and the second on December 11, 2004, that affected 13,661 customers and lasted  
23   297 minutes (almost five hours). There may have been others I do not know about. My

1 concern is whether these incidents are indicative of a trend of deteriorating distribution  
2 conditions in Center City, and by extension, the rest of Philadelphia. Through  
3 interrogatories, the City has asked PECO for information that might help reassure the  
4 City on this issue, but the responses have been insufficient for the City to make any  
5 determination. For example, the City asked PECO to provide any distribution system  
6 condition assessments done by PECO for Center City and other areas in the city, but the  
7 response was that PECO does various system evaluation analyses in general and the  
8 results of this work are confidential. I note that the standard reliability metrics such as  
9 CAIDI, MAIFI, SAIDI and SAIFI show that electric service is more reliable in  
10 Philadelphia than in the suburbs, but this largely reflects the fact that most suburban  
11 outages are storm-related, and urban areas, with fewer trees and more underground lines,  
12 generally have better scores.

13  
14 Furthermore, this data does not indicate how specific circuits perform, such as those in  
15 Center City or other areas that may have experienced large outages. There also appear to  
16 be a number of streetlights and traffic lights that suffer repeated outages from PECO  
17 infrastructure problems that do not receive permanent fixes. It is our position that PECO  
18 should not be allowed to merge with another company without answering questions about  
19 its system reliability, and PECO has an affirmative responsibility to demonstrate to the  
20 City that it is providing reliable service. I also have information that PGW has lost  
21 power from PECO a half-dozen unexplained times in the past 18 months.

22

1 **Q. How do development plans for the City raise your concerns about the reliability of**  
2 **electric service in Philadelphia?**

3 A. The City has over 9,000 market rate housing units under construction, two gaming  
4 facilities the Commonwealth has slated for Philadelphia, and an ambitious Navy Yard  
5 development plan, just to name a few projects and proposals. All of these will require  
6 significant energy. To the extent reliability problems already exist – and as I have stated,  
7 we have been unable to determine this to date – I would be concerned that the addition of  
8 another large subsidiary, PSE&G, to the Exelon group could exacerbate the problems.

9  
10 **Q. What should the Commission do about reliability?**

11 A. As a first step, the Commission should require PECO to produce usable reliability data  
12 and existing studies that will enable the intervenors and the Commission to determine  
13 whether further study is required. To the extent those studies are in fact confidential, the  
14 parties will maintain their confidentiality. If there are significant problems, PECO should  
15 fund an appropriate study to determine how to address them, in consultation with the City  
16 and other stakeholders.

17  
18 **Q. Why don't you think the merger proposal demonstrates that it will affirmatively**  
19 **promote the service, convenience, or safety of the public in a substantial way?**

20 A. Largely because the merger application is long on generalities about synergy benefits, but  
21 short on quantifiable specifics. The application gives just a paragraph (and often a short  
22 one) on such important issues as the benefits of increased scale and scope, electricity  
23 delivery, sharing of best practices, commitment to competition, and so on. Other than

1 promises to do the right thing with respect to improving business efficiencies by, for  
2 example, implementing best practices, only the synergy savings have been quantified.  
3 For customers, these are hardly material even if all were applied directly to rate relief. I  
4 do not see specifics on how the merger would improve service, convenience, or safety.

5  
6 **Q. Why are you concerned that PECO has not identified the specific best practices it  
7 proposes to implement?**

8 A. First, because the application says they are important merger benefits. But how are we to  
9 evaluate this assertion if we do not know what they are? And second, we think that the  
10 implementation of best practices could help demonstrate the benefits of the proposed  
11 merger depending, of course, on what they are, and when and how they are implemented.  
12 If the best practices cannot be specifically identified until after the merger, in which case  
13 they are only hypothetical, then such practices do not represent any tangible benefit and  
14 are not useful for evaluating the proposed merger.

15  
16 **Q. Regarding best practices, do you have some suggestions as to what these are and  
17 which of these practices would benefit ratepayers?**

18 A. In general, the City supports cost-effective programs that reduce usage and demand in the  
19 long run, especially, but not exclusively, for low-income customers, as well as programs  
20 that assist ratepayers that would otherwise need social services, funded by governments  
21 or charities, due to the loss of utility service. I believe that PSE&G may have some  
22 social benefit and energy efficiency programs that can be viewed as best practices for  
23 programs of these types and which could possibly benefit PECO ratepayers. I note that

1 PECO has promised to implement "best practices" anyway, which means their cost  
2 should not come out of the "synergy savings," at least on the regulated side. However, at  
3 this time, PECO has not provided sufficiently detailed responses to the City's  
4 interrogatories in order for the City or the Commission to be able to determine what best  
5 practices will be adopted. I would reserve the right to supplement this answer when the  
6 information becomes available.

7  
8 **Q. Moving on to corporate presence, would it not benefit the public for PECO to**  
9 **maintain or increase charitable giving and community involvement?**

10 A. Yes, it would. PECO's charitable involvement is extremely important to the City and to  
11 other communities in the Commonwealth. However, PECO does not propose to  
12 condition the merger on this promise; it merely states its intentions. Also, continuing the  
13 status quo is hardly a merger benefit; it is business as usual. At a minimum, though, the  
14 Commission must ensure that the merger does not lead PECO to reduce its charitable  
15 giving to the City, or to the other communities it serves, in the short or long term.

16  
17 **Q. Why is the location of PECO's headquarters important?**

18 A. This is of vital importance to the City and to the PECO employees who work in  
19 Philadelphia. I commend PECO for its stated commitment to keep its headquarters in the  
20 City, but the Commission should condition merger approval on this commitment.  
21 Otherwise, the City is concerned that other regulatory bodies may impose conditions on  
22 the merger that are adverse to the City's interests, as well as the interests of others in the  
23 Commonwealth.

1 Q. Why shouldn't the Commission and public be satisfied with general commitments as  
2 to employment?

3 A. First, PECO has stated that it expects the merger to cost its headquarters about 90  
4 employees. A reduction of 90 before January 2, 2008 would violate the terms of the  
5 settlement agreement that permitted the acquisition of PECO by Unicom, now Exelon, in  
6 2000. The City settled with PECO based in part on its commitments: (1) to maintain its  
7 headquarters in Philadelphia through at least January 1, 2008; (2) to maintain  
8 employment of at least 1,325 at that headquarters through December 31, 2001; 1,300  
9 through December 31, 2002; 1,275 through January 1, 2004; and 1,100 through January  
10 1, 2008; and (3) to not reduce "line forces in Philadelphia County" as a result of the  
11 merger. Exhibit \_\_\_ (KRM-1) is a true and correct copy of a letter from PECO to the  
12 City that became part of the Unicom merger settlement.

13  
14 PECO has sent a letter to the Commission each year certifying compliance with its  
15 commitments. See Exhibit \_\_\_ (KRM-2). I received copies of each letter shortly after  
16 its date. Most recently, per Exhibit \_\_\_ (KRM-2), p. 4, PECO certified an employment  
17 level of 1,136 at its headquarters as of December 31, 2004. A reduction of 90 would  
18 leave employment at 1,046, well below the level to which PECO has committed.

19  
20 I should add that it is not clear whether PECO has in fact complied with its employment  
21 commitments. Exhibit \_\_\_ (KRM-3) is a true and correct copy of PECO's answers to the  
22 City's Interrogatory No. 15. In its responses, PECO indicates that it had 1,302 full-time  
23 employees at headquarters on January 1, 2000 (several months prior to settlement); 1,160

1 on January 1, 2001; 965 on January 1, 2002; 883 on January 1, 2003; 1,031 on January 1,  
2 2004; and 984 on January 1, 2005. PECO has stated orally that its employment  
3 certifications to the Commission include independent contractors, while the response to  
4 the City's interrogatory does not. PECO has not yet informed the City as to how many  
5 contractors PECO is employing and whether these contractors are full-time or part-time  
6 workers.

7  
8 **Q. Has PECO met its commitment not to reduce line forces as a result of the 2000**  
9 **merger?**

10 A. As far as we can tell, PECO has not met that commitment. According to PECO's  
11 interrogatory answers, Exhibit \_\_\_ (KRM-3), its line forces in Philadelphia fell from 250  
12 on January 1, 2000 (down from 309 the year before) to 235 in 2002, then recovered for a  
13 year, but were down to 221 most recently, a 12% decrease from 2000. Line forces  
14 outside the City are also down about 8%.

15  
16 **Q. Is that a problem for the City, besides any decrease in wage taxes?**

17 A. Yes. This reduction may have contributed to an inadequate level of maintenance and  
18 service the City's Streets Department is experiencing from PECO with respect to street  
19 light taps, traffic signal service connections, and underground conduits. In the City's  
20 experience, emergency outages are fixed temporarily, but frequently remain with  
21 temporary fixes for months and years at a time, since the line forces are kept busy  
22 responding to emergencies. Those temporary fixes are also more prone to fail. Examples  
23 are the streetlights on Grays Ferry Bridge and on Pattison Avenue in the stadium area.

1 Q. **Should the Commission approve the merger?**

2 A. I am of two minds on that question. On the one hand, PECO has been a pretty good  
3 neighbor, and we wish it well. If the merger helps shareholders as well as the City, we're  
4 happy for PECO. On the other hand, the City and the Commission would be remiss if we  
5 relied solely on relationships and trust, especially because ultimate control of the  
6 Company is now and will remain out of state. Whether or not the merger creates undue  
7 market power, it would certainly give Exelon power that could be abused, especially if it  
8 were to cease to care as much about the City and region. Therefore, if the merger does  
9 appear to affirmatively promote the service, convenience, or safety of the public in a  
10 substantial way, it is crucial for the Commission to make those public benefits  
11 enforceable in the long term.

12  
13 I want to add that PECO has in many respects done well by the City, even since the 2000  
14 merger. For example, last fall it negotiated an amendment to the City's contracts for  
15 electricity to Philadelphia International Airport to make it easier and more predictable to  
16 calculate certain bill components and to eliminate a contractual disincentive for the  
17 Airport to "shop" for electricity from other suppliers. But since announcing the merger,  
18 PECO has delayed by more than six months in signing off on this new agreement, and  
19 has not thus far eliminated similar "shopping" disincentives from many of the City's other  
20 contracts. We have spoken with PECO and are now confident that the Commission will  
21 not need to address this issue, but it gives us pause to think what could come later.

22  
23



1 [REDACTED]  
2 [REDACTED]  
3 [REDACTED]  
4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]  
8 [REDACTED]  
9 [REDACTED]  
10 [REDACTED]  
11 [REDACTED]  
12 [REDACTED]  
13 [REDACTED]  
14 [REDACTED]  
15 [REDACTED]  
16 [REDACTED]  
17 [REDACTED]  
18 [REDACTED]  
19 [REDACTED]  
20 [REDACTED]  
21 [REDACTED]  
22 [REDACTED]  
23 [REDACTED]

1 [REDACTED]

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18

19 Q. Does this conclude your testimony?

20 A. Yes, it does.

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT APPLICATION OF PECO ENERGY :  
COMPANY AND PUBLIC SERVICE :  
ELECTRIC & GAS COMPANY FOR :  
APPROVAL OF THE MERGER OF : DOCKET NO. A-110550F0160  
PUBLIC SERVICE ENTERPRISE :  
GROUP, INC., WITH AND INTO :  
EXELON CORPORATION :**

**EXHIBITS  
OF  
KENT R. MILLER**

**ON BEHALF OF  
THE CITY OF PHILADELPHIA**

**JUNE 2005**



**PECO ENERGY**

Exhibit \_\_\_ (KRM-1)

PECO Energy Distribution

PECO Energy Company  
2301 Market Street  
PO Box 8699  
Philadelphia, PA 19101-8699  
215 841 6200  
Fax 215 841 6706  
E-mail: [klawrence@peco-energy.com](mailto:klawrence@peco-energy.com)

April 11, 2000

The Honorable John F. Street  
Mayor of the City of Philadelphia  
Office of the Mayor  
City Hall Room 214  
Philadelphia, PA 19107

Dear Mayor Street:

This letter will confirm PECO Energy's commitments that (1) PECO Energy will maintain the corporate headquarters for its distribution business in Philadelphia through at least January 1, 2008; (2) the merger of PECO Energy and Unicom will result in no reduction in line forces in Philadelphia County; and (3) PECO Energy will maintain employment at 2301 Market Street at no less than the following levels:

1325 through December 31, 2001

1300 through December 31, 2002

1275 through January 1, 2004

1100 through January 1, 2008.

Sincerely,



Brian D. Crowe  
Director  
Regulatory &  
Governmental Affairs

Telephone 215.841.5316  
Fax 215.841.6447  
www.exeloncorp.com  
brian.crowe@exeloncorp.com

An Exelon Company

PECO Energy Company  
P.O. Box 8699  
2301 Market Street  
Philadelphia, PA 19101-8699

February 28, 2002

Mr. James McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North St.  
Harrisburg, PA 17105-3265

RE: Compliance filing associated with the Commission Order at Docket Number A-110550F0147 concerning the employment and staffing levels at 2301 Market Street

Dear Mr. McNulty:

PECO Energy provides the following information concerning the Company's 2001 employment and staffing levels per its commitment to the City of Philadelphia pursuant to Paragraph 65 and Appendix G of the Merger Settlement approved at Docket Number A-110550F0147.

**2001 year end employment level at 2301 Market St.: 1,412.**

Please acknowledge receipt of the foregoing on the enclosed copy of this letter. A business reply envelope is enclosed for your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Crowe".

cc: David Kleppinger, Esq.  
Counsel for City of Philadelphia



An Exelon Company

Brian D. Crowe  
Director  
Regulatory & Governmental Affairs

Telephone 215.841.5316  
Fax 215.841.6447  
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brian.crowe@peco-energy.com

PECO Energy Company  
2301 Market Street, S15-2  
P.O. Box 8699  
Philadelphia, PA 19101-8699

February 21, 2003

Mr. James McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Re: Compliance filing associated with the Commission Order at Docket No.  
A-110550F0147 concerning the employment and staffing levels at 2301  
Market Street

Dear Mr. McNulty:

PECO Energy provides the following information concerning the Company's  
2002 employment and staffing levels per its commitment to the City of  
Philadelphia pursuant to Paragraph 65 and Appendix G of the Merger Settlement  
approved at Docket No. A-110550F0147.

**2002 year end employment level at 2301 Market Street: 1,313**

Please acknowledge receipt of the foregoing on the enclosed copy of this letter.  
A business reply envelope is enclosed for your convenience.

Sincerely,

A handwritten signature in cursive script that reads "Brian D. Crowe".

cc: David Kleppinger, Esquire  
Counsel for City of Philadelphia



An Exelon Company

Brian D. Crowe  
Director  
Rates & Regulatory Affairs

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PECO Energy Company  
3301 Market Street, S15-2  
Philadelphia, PA 19103

Mail To: PO. Box 8699  
Philadelphia, PA 19101-8699

February 20, 2004

Mr. James McNulty, Secretary  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17105-3265

Re: Compliance filing associated with the Commission Order at Docket No.  
A-110550F0147 concerning the employment and staffing levels at  
2301 Market Street

Dear Mr. McNulty:

PECO Energy provides the following information concerning the Company's  
2003 employment and staffing levels per its commitment to the City of  
Philadelphia pursuant to Paragraph 65 and Appendix G of the Merger Settlement  
approved at Docket No. A-110550F0147.

**2003 year end employment level at 2301 Market Street: 1,286**

Please acknowledge receipt of the foregoing on the enclosed copy of this letter.  
A business reply envelope is enclosed for your convenience.

Sincerely,

cc: David Kleppinger, Esquire  
Counsel for City of Philadelphia

Jun 27 2005 14:55 P.02

LAW DEP REGULATORY OFF Fax:215-683-5175

**Brian D. Crowe**  
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PECO Energy Company  
2301 Market Street  
Philadelphia, PA 19103

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Philadelphia, PA 19101-8699

March 1, 2005

**Mr. James McNulty, Secretary**  
Pennsylvania Public Utility Commission  
Commonwealth Keystone Building  
400 North Street  
Harrisburg, PA 17120

**Re: Compliance Filing Associated With The Commission Order at Docket  
No. A-110550F0147 Concerning the Employment And Staffing Levels At  
2301 Market Street**

Dear Secretary McNulty:

PECO Energy provides the following information concerning the Company's 2004 employment and staffing levels per its commitment to the City of Philadelphia pursuant to Paragraph 65 and Appendix G of the Merger Settlement approved at Docket No. A-110550F0147.

2004 year end employment level at 2301 Market Street: 1,155

Please acknowledge receipt of the foregoing on the enclosed copy of this letter. A business reply envelope is enclosed for your convenience.

Sincerely,



cc: David Kleppinger, Esquire  
Counsel for City of Philadelphia

APA:amm

PECO Energy Company and  
Public Service Electric & Gas Company  
Docket No. A-110550F0160

## COP-I-15

For each job category maintained by PECO and/or Exelon, and overall, please provide the number and average salary of PECO and/or Exelon employees for each year from 1999 through 2004, and forecasted for each year from 2005 through 2012, for each of the following:

- a. Employees located at 2300 Market Street, Philadelphia.
- b. Employees located at any facilities in the city of Philadelphia, other than at 2300 Market Street.
- c. "Line" or "field" employees located at any facilities in the city of Philadelphia.
- d. Employees throughout PECO's service territory.
- e. "Line" or "field" employees located throughout PECO's service territory.

## RESPONSE

a-e.

Please see the attached reports, Attachments COP-I-15-1, 2, 3, 4, 5, 6 and 7, regarding the requested staffing levels for each year from 1999 through 2005. It should be noted that:

1. Each attached report contains information as of January 1 for each year;
2. Each report provides data on all regular, non-terminated employees (including employees on leave) but does not include information on temporary employees and employees supplied by contractors, all of whom may have been included in various reports to governmental agencies during those years; and,
3. Each report includes information responsive to both COP-I-15 and COP-I-16 for that year.

PECO and Exelon have not developed employment forecasts for the remainder of 2005 or for the years 2006 through 2012.

Responsible Witness: Denis P. O'Brien

## DATA FOR JANUARY 1, 1999

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	17		17
		Average of Annual Rt	225,602		225,602
	Key Managers	Count of Name	53		53
		Average of Annual Rt	112,859		112,859
	Mgrs, Supvs & Indiv Contribs	Count of Name	742	7	749
		Average of Annual Rt	66,112	43,225	65,898
	NE Hourly	Count of Name	45		45
		Average of Annual Rt	46,595		46,595
	NE Salaried	Count of Name	458	5	463
		Average of Annual Rt	41,497	32,318	41,398
Total Count of Name			1315	12	1327
Total Average of Annual Rt			60,817	38,681	60,617

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Philadelphia	Key Managers	Count of Name	5		5
		Average of Annual Rt	101,484		101,484
	Mgrs, Supvs & Indiv Contribs	Count of Name	66		66
		Average of Annual Rt	66,186		66,186
	NE Hourly	Count of Name	496		496
		Average of Annual Rt	51,814		51,814
	NE Salaried	Count of Name	46	1	47
		Average of Annual Rt	46,901	27,113	46,480
Total Count of Name			613	1	614
Total Average of Annual Rt			53,398	27,113	53,355

## Question 15.c

PECO and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 1999

"Line" or "Field" Employees Located in any Philadelphia Facility

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Line-Flid	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	309	309
		Average of Annual Rt	52,164	52,164
Total Count of Name			309	309
Total Average of Annual Rt			52,164	52,164

## Question 15.d

PECO and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 1999

Located throughout the PECO Service Territory, but NOT in Philadelphia

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Service	Executives	Count of Name	12		12	
		Average of Annual Rt	186,314		186,314	
	Key Managers	Count of Name	79		79	
		Average of Annual Rt	109,204		109,204	
	Mgrs, Supvs & Indiv Contribs	Count of Name	1658	7	1665	
		Average of Annual Rt	67,407	40,969	67,296	
	NE Hourly	Count of Name	2180	1	2181	
		Average of Annual Rt	54,856	50,303	54,853	
	NE Salaried	Count of Name	699	4	703	
		Average of Annual Rt	45,002	25,866	44,893	
	Total Count of Name			4628	12	4640
	Total Average of Annual Rt			59,133	36,712	59,075

Question 15.e F=Full Time  
 PECO and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 1999  
 "Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part	
Discover Line-Flid	Level	Data	F	Grand Total
Field-PECO	NE Hourly	Count of Name	869	869
		Average of Annual Rt	53,646	53,646
Total Count of Name			869	869
Total Average of Annual Rt			53,646	53,646

Question 16.a F=Full Time  
 ComEd and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located in the City of Chicago Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part			
Discover Loc	Level	Data	F	P	Grand Total	
ComEd-Chicago	Executives	Count of Name	42		42	
		Average of Annual Rt	198,634		198,634	
	Key Managers	Count of Name	88		1	89
		Average of Annual Rt	106,640		127,034	106,869
	Mgrs, Supvs & Indiv Contribs	Count of Name	1102		24	1126
		Average of Annual Rt	64,934		43,242	64,472
	NE Hourly	Count of Name	1735		72	1807
		Average of Annual Rt	45,514		26,186	44,743
	NE Salaried	Count of Name	321		9	330
		Average of Annual Rt	45,495		22,999	44,882
Total Count of Name			3288	106	3394	
Total Average of Annual Rt			55,613	30,728	54,836	

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 1999**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Chicago	NE Hourly	Count of Name	679	679
		Average of Annual Rt	51,675	51,675
Total Count of Name			679	679
Total Average of Annual Rt			51,675	51,675

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 1999**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

			Full/Part			
Discover Loc	Level	Data	F	P	Grand Total	
ComEd-Service	Executives	Count of Name	29		29	
		Average of Annual Rt	191,255		191,255	
	Key Managers	Count of Name	180		180	
		Average of Annual Rt	111,172		111,172	
	Mgrs, Supvs & Indiv Contribs	Count of Name	4048		9	4057
		Average of Annual Rt	67,104		43,460	67,052
	NE Hourly	Count of Name	6330		166	6496
		Average of Annual Rt	48,460		26,199	47,891
	NE Salaried	Count of Name	544		8	552
		Average of Annual Rt	51,032		23,563	50,634
Total Count of Name			11131	183	11314	
Total Average of Annual Rt			56,752	26,933	56,270	

Question 16.e

ComEd and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 1999

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1839	1839
		Average of Annual Rt	53,354	53,354
Total Count of Name			1839	1839
Total Average of Annual Rt			53,354	53,354

DATA FOR JANUARY 1, 1999

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	17		17
		Average of Annual Rt	225,602		225,602
	Key Managers	Count of Name	53		53
		Average of Annual Rt	112,859		112,859
	Mgrs, Supvs & Indiv Contribs	Count of Name	742	7	749
		Average of Annual Rt	66,112	43,225	65,898
	NE Hourly	Count of Name	45		45
		Average of Annual Rt	46,595		46,595
	NE Salaried	Count of Name	458	5	463
		Average of Annual Rt	41,497	32,318	41,398
Total Count of Name			1315	12	1327
Total Average of Annual Rt			60,817	38,681	60,617

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Philadelphia	Key Managers	Count of Name	5		5
		Average of Annual Rt	101,484		101,484
	Mgrs, Supvs & Indiv Contribs	Count of Name	66		66
		Average of Annual Rt	66,186		66,186
	NE Hourly	Count of Name	496		496
		Average of Annual Rt	51,814		51,814
	NE Salaried	Count of Name	46	1	47
		Average of Annual Rt	46,901	27,113	46,480
Total Count of Name			613	1	614
Total Average of Annual Rt			53,398	27,113	53,355

Question 15.c  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 "Line" or "Field" Employees Located in any Philadelphia Facility

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	309	309
		Average of Annual Rt	52,164	52,164
Total Count of Name			309	309
Total Average of Annual Rt			52,164	52,164

Question 15.d  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located throughout the PECO Service Territory, but NOT in Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part		
Discover Loc	Level	Data	F	P	Grand Total
PECO-Service	Executives	Count of Name	12		12
		Average of Annual Rt	186,314		186,314
	Key Managers	Count of Name	79		79
		Average of Annual Rt	109,204		109,204
	Mgrs, Supvs & Indiv Contribs	Count of Name	1658	7	1665
		Average of Annual Rt	67,407	40,969	67,296
	NE Hourly	Count of Name	2180	1	2181
		Average of Annual Rt	54,856	50,303	54,853
	NE Salaried	Count of Name	699	4	703
		Average of Annual Rt	45,002	25,866	44,893
Total Count of Name			4628	12	4640
Total Average of Annual Rt			59,133	36,712	59,075

Question 15.e F=Full Time  
 PECO and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 1999  
 "Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia Displays:  
# Employees  
Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-PECO	NE Hourly	Count of Name	869	869
		Average of Annual Rt	53,646	53,646
Total Count of Name			869	869
Total Average of Annual Rt			53,646	53,646

Question 16.a F=Full Time  
 ComEd and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 1999  
 Located in the City of Chicago Displays:  
# Employees  
Average Annual Base Salary

			Full/Part		
Discover Loc	Level	Data	F	P	Grand Total
ComEd-Chicago	Executives	Count of Name	42		42
		Average of Annual Rt	198,634		198,634
	Key Managers	Count of Name	88	1	89
		Average of Annual Rt	106,640	127,034	106,869
	Mgrs, Supvs & Indiv Contribs	Count of Name	1102	24	1126
		Average of Annual Rt	64,934	43,242	64,472
	NE Hourly	Count of Name	1735	72	1807
		Average of Annual Rt	45,514	26,186	44,743
	NE Salaried	Count of Name	321	9	330
		Average of Annual Rt	45,495	22,999	44,882
Total Count of Name			3288	106	3394
Total Average of Annual Rt			55,613	30,728	54,836

## Question 16.b

ComEd and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 1999

"Line" or "Field" Employees Located in City of Chicago

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Chicago	NE Hourly	Count of Name	679	679
		Average of Annual Rt	51,675	51,675
Total Count of Name			679	679
Total Average of Annual Rt			51,675	51,675

## Question 16.d

ComEd and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 1999

Located throughout the ComEd Service Territory, but NOT in Chicago

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

			Full/Part			
Discover Loc	Level	Data	F	P	Grand Total	
ComEd-Service	Executives	Count of Name	29		29	
		Average of Annual Rt	191,255		191,255	
	Key Managers	Count of Name	180		180	
		Average of Annual Rt	111,172		111,172	
	Mgrs, Supvs & Indiv Contribs	Count of Name	4048		9	4057
		Average of Annual Rt	67,104		43,460	67,052
	NE Hourly	Count of Name	6330		166	6496
		Average of Annual Rt	48,460		26,199	47,891
	NE Salaried	Count of Name	544		8	552
		Average of Annual Rt	51,032		23,563	50,634
Total Count of Name			11131	183	11314	
Total Average of Annual Rt			56,752	26,933	56,270	

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 1999

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1839	1839
		Average of Annual Rt	53,354	53,354
Total Count of Name			1839	1839
Total Average of Annual Rt			53,354	53,354

**Attachment COP-I-15-2**

DATA FOR JANUARY 1, 2000

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2000  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	19		19
		Average of Annual Rt	239,316		239,316
	Key Managers	Count of Name	58		58
		Average of Annual Rt	119,631		119,631
	Mgrs, Supvs & Indiv Contribs	Count of Name	734	6	740
		Average of Annual Rt	67,908	47,897	67,746
	NE Hourly	Count of Name	44	1	45
		Average of Annual Rt	46,406	15,041	45,709
	NE Salaried	Count of Name	447	44	491
		Average of Annual Rt	42,318	20,927	40,401
Total Count of Name			1302	51	1353
Total Average of Annual Rt			63,201	23,984	61,723

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2000  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Philadelphia	Key Managers	Count of Name	4		4	
		Average of Annual Rt	111,008		111,008	
	Mgrs, Supvs & Indiv Contribs	Count of Name	60		60	
		Average of Annual Rt	69,832		69,832	
	NE Hourly	Count of Name	409		409	
		Average of Annual Rt	55,284		55,284	
	NE Salaried	Count of Name	48	1	49	
		Average of Annual Rt	47,990	18,979	47,398	
	Total Count of Name			521	1	522
	Total Average of Annual Rt			56,716	18,979	56,643

**Attachment COP-I-15-2**

**Question 15.c**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2000**  
**"Line" or "Field" Employees Located in any Philadelphia Facility**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	250	250
		Average of Annual Rt	56,126	56,126
Total Count of Name			250	250
Total Average of Annual Rt			56,126	56,126

**Question 15.d**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2000**  
**Located throughout the PECO Service Territory, but NOT in Philadelphia**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Service	Executives	Count of Name	17		17
		Average of Annual Rt	194,500		194,500
	Key Managers	Count of Name	95		95
		Average of Annual Rt	112,608		112,608
	Mgrs, Supvs & Indiv Contribs	Count of Name	1755	5	1760
		Average of Annual Rt	69,625	40,788	69,543
	NE Hourly	Count of Name	2060	1	2061
		Average of Annual Rt	56,873	52,067	56,871
	NE Salaried	Count of Name	497	6	503
		Average of Annual Rt	44,758	25,685	44,530
Total Count of Name			4424	12	4436
Total Average of Annual Rt			62,296	34,176	62,220

**Attachment COP-I-15-2**

Question 15.e

PECO and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 2000

"Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-PECO	NE Hourly	Count of Name	801	801
		Average of Annual Rt	55,671	55,671
Total Count of Name			801	801
Total Average of Annual Rt			55,671	55,671

Question 16.a

ComEd and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 2000

Located in the City of Chicago

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Chicago	Executives	Count of Name	42		42
		Average of Annual Rt	217,632		217,632
	Key Managers	Count of Name	93	1	94
		Average of Annual Rt	114,665	130,423	114,833
	Mgrs, Supvs & Indiv Contribs	Count of Name	1056	24	1080
		Average of Annual Rt	68,895	49,112	68,455
	NE Hourly	Count of Name	1532	73	1605
		Average of Annual Rt	45,368	27,065	44,536
	NE Salaried	Count of Name	314	9	323
		Average of Annual Rt	48,215	26,507	47,610
Total Count of Name			3037	107	3144
Total Average of Annual Rt			58,347	32,929	57,482

**Attachment COP-I-15-2**

Question 16.b  
 ComEd and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2000  
 "Line" or "Field" Employees Located in City of Chicago

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Chicago	NE Hourly	Count of Name	681	681
		Average of Annual Rt	53,285	53,285
Total Count of Name			681	681
Total Average of Annual Rt			53,285	53,285

Question 16.d  
 ComEd and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2000  
 Located throughout the ComEd Service Territory, but NOT in Chicago

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part		
Discover Loc	Level	Data	F	P	Grand Total
ComEd-Service	Executives	Count of Name	36		36
		Average of Annual Rt	205,696		205,696
	Key Managers	Count of Name	182		182
		Average of Annual Rt	115,770		115,770
	Mgrs, Supvs & Indiv Contribs	Count of Name	3895	14	3909
		Average of Annual Rt	70,377	41,960	70,275
	NE Hourly	Count of Name	5484	172	5656
		Average of Annual Rt	49,364	27,042	48,685
	NE Salaried	Count of Name	588	10	598
		Average of Annual Rt	52,258	29,388	51,876
Total Count of Name			10185	196	10381
Total Average of Annual Rt			59,306	28,228	58,719

Attachment COP-I-15-2

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 2000

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1877	1877
		Average of Annual Rt	53,667	53,667
Total Count of Name			1877	1877
Total Average of Annual Rt			53,667	53,667

**Attachment COP-I-15-3**

DATA FOR JANUARY 1, 2001

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2001  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	NE Hourly	Count of Name	32		32
		Average of Annual Rt	53,958		53,958
	NE Salaried	Count of Name	395	37	432
		Average of Annual Rt	42,343	22,505	40,644
	Key Managers	Count of Name	64		64
		Average of Annual Rt	119,199		119,199
	Mgrs, Supvs & Indiv Contribs	Count of Name	650	4	654
		Average of Annual Rt	69,697	46,694	69,556
	Executives	Count of Name	19		19
		Average of Annual Rt	249,079		249,079
Total Count of Name			1160	41	1201
Total Average of Annual Rt			65,617	24,865	64,226

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2001  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Philadelphia	NE Hourly	Count of Name	378		378	
		Average of Annual Rt	57,939		57,939	
	NE Salaried	Count of Name	44	1	45	
		Average of Annual Rt	51,512	26,458	50,955	
	Key Managers	Count of Name	4		4	
		Average of Annual Rt	104,910		104,910	
	Mgrs, Supvs & Indiv Contribs	Count of Name	50		50	
		Average of Annual Rt	73,214		73,214	
	Total Count of Name			476	1	477
	Total Average of Annual Rt			59,344	26,458	59,275

**Attachment COP-I-15-3**

Question 15.c  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2001  
 "Line" or "Field" Employees Located in any Philadelphia Facility

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	242	242
		Average of Annual Rt	57,960	57,960
Total Count of Name			242	242
Total Average of Annual Rt			57,960	57,960

Question 15.d  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2001  
 Located throughout the PECO Service Territory, but NOT in Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Service	NE Hourly	Count of Name	1977		1977	
		Average of Annual Rt	59,144		59,144	
	NE Salaried	Count of Name	429	4	433	
		Average of Annual Rt	45,485	26,838	45,312	
	Key Managers	Count of Name	124		124	
		Average of Annual Rt	113,160		113,160	
	Mgrs, Supvs & Indiv Contribs	Count of Name	1628	5	1633	
		Average of Annual Rt	71,985	40,588	71,889	
	Executives	Count of Name	34		34	
		Average of Annual Rt	218,794		218,794	
	Total Count of Name			4192	9	4201
	Total Average of Annual Rt			65,626	34,477	65,559

**Attachment COP-I-15-3**

Question 15.e F=Full Time  
 PECO and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2001  
 "Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-PECO	NE Hourly	Count of Name	810	810
		Average of Annual Rt	57,504	57,504
Total Count of Name			810	810
Total Average of Annual Rt			57,504	57,504

Question 16.a F=Full Time  
 ComEd and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2001  
 Located in the City of Chicago Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		
			F	P	Grand Total
ComEd-Chicago	NE Hourly	Count of Name	1444	66	1510
		Average of Annual Rt	46,978	28,037	46,150
	NE Salaried	Count of Name	300	5	305
		Average of Annual Rt	51,615	20,402	51,103
	Key Managers	Count of Name	116		116
		Average of Annual Rt	118,657		118,657
	Mgrs, Supvs & Indiv Contribs	Count of Name	896	17	913
		Average of Annual Rt	73,245	57,108	72,945
	Executives	Count of Name	43		43
		Average of Annual Rt	233,387		233,387
Total Count of Name			2799	88	2887
Total Average of Annual Rt			61,718	33,219	60,849

**Attachment COP-I-15-3**

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2001**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Chicago	NE Hourly	Count of Name	683	683
		Average of Annual Rt	54,535	54,535
Total Count of Name			683	683
Total Average of Annual Rt			54,535	54,535

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2001**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Service	NE Hourly	Count of Name	5425	187	5612
		Average of Annual Rt	51,251	28,130	50,480
	NE Salaried	Count of Name	477	6	483
		Average of Annual Rt	53,254	33,677	53,010
	Key Managers	Count of Name	243		243
		Average of Annual Rt	117,754		117,754
	Mgrs, Supvs & Indiv Contribs	Count of Name	3608	19	3627
		Average of Annual Rt	74,316	42,077	74,147
	Executives	Count of Name	43		43
		Average of Annual Rt	222,846		222,846
Total Count of Name			9796	212	10008
Total Average of Annual Rt			62,246	29,537	61,553

Attachment COP-I-15-3

Question 16.e

ComEd and/or Exelon Employees

Regular, Non-Terminated Employees as of January 1, 2001

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1879	1879
		Average of Annual Rt	55,152	55,152
Total Count of Name			1879	1879
Total Average of Annual Rt			55,152	55,152

**Attachment COP-I-15-4**

DATA FOR JANUARY 1, 2002

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2002  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	16		16
		Average of Annual Rt	217,800		217,800
	Key Managers	Count of Name	55		55
		Average of Annual Rt	122,979		122,979
	Mgrs, Supvs & Indiv Contribs	Count of Name	541	5	546
		Average of Annual Rt	72,067	47,402	71,842
	NE Hourly	Count of Name	21		21
		Average of Annual Rt	56,299		56,299
	NE Salaried	Count of Name	332	61	393
		Average of Annual Rt	43,889	22,971	40,642
Total Count of Name			965	66	1031
Total Average of Annual Rt			67,348	24,821	64,625

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2002  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Philadelphia	Key Managers	Count of Name	3		3	
		Average of Annual Rt	113,280		113,280	
	Mgrs, Supvs & Indiv Contribs	Count of Name	47		47	
		Average of Annual Rt	75,927		75,927	
	NE Hourly	Count of Name	349		349	
		Average of Annual Rt	59,648		59,648	
	NE Salaried	Count of Name	42		42	
		Average of Annual Rt	53,914		53,914	
	Total Count of Name			441		441
	Total Average of Annual Rt			61,202		61,202

**Attachment COP-I-15-4**

**Question 15.c**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2002**  
**"Line" or "Field" Employees Located in any Philadelphia Facility**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	235	235
		Average of Annual Rt	59,539	59,539
Total Count of Name			235	235
Total Average of Annual Rt			59,539	59,539

**Question 15.d**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2002**  
**Located throughout the PECO Service Territory, but NOT in Philadelphia**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Service	Executives	Count of Name	31		31
		Average of Annual Rt	225,089		225,089
	Key Managers	Count of Name	124		124
		Average of Annual Rt	121,504		121,504
	Mgrs, Supvs & Indiv Contribs	Count of Name	1581	8	1589
		Average of Annual Rt	74,509	42,489	74,348
	NE Hourly	Count of Name	1929		1929
		Average of Annual Rt	61,397		61,397
	NE Salaried	Count of Name	407	4	411
		Average of Annual Rt	46,770	23,745	46,546
Total Count of Name			4072	12	4084
Total Average of Annual Rt			68,103	36,241	68,009

**Attachment COP-I-15-4**

Question 15.e F=Full Time  
 PECO and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2002  
 "Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-PECO	NE Hourly	Count of Name	800	800
		Average of Annual Rt	59,465	59,465
Total Count of Name			800	800
Total Average of Annual Rt			59,465	59,465

Question 16.a F=Full Time  
 ComEd and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2002  
 Located in the City of Chicago Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Chicago	Executives	Count of Name	40		40
		Average of Annual Rt	240,199		240,199
	Key Managers	Count of Name	100		100
		Average of Annual Rt	125,864		125,864
	Mgrs, Supvs & Indiv Contribs	Count of Name	763	12	775
		Average of Annual Rt	75,117	50,023	74,728
	NE Hourly	Count of Name	1345	77	1422
		Average of Annual Rt	49,222	29,423	48,150
	NE Salaried	Count of Name	267	2	269
		Average of Annual Rt	53,415	24,470	53,200
Total Count of Name			2515	91	2606
Total Average of Annual Rt			63,608	32,031	62,505

**Attachment COP-I-15-4**

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2002**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Chicago	NE Hourly	Count of Name	668	668
		Average of Annual Rt	56,500	56,500
Total Count of Name			668	668
Total Average of Annual Rt			56,500	56,500

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2002**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Service	Executives	Count of Name	42		42
		Average of Annual Rt	223,518		223,518
	Key Managers	Count of Name	242		242
		Average of Annual Rt	123,113		123,113
	Mgrs, Supvs & Indiv Contribs	Count of Name	3517	21	3538
		Average of Annual Rt	76,796	42,906	76,594
	NE Hourly	Count of Name	5063	122	5185
		Average of Annual Rt	53,454	29,822	52,898
	NE Salaried	Count of Name	407	1	408
		Average of Annual Rt	56,258	41,250	56,221
Total Count of Name			9271	144	9415
Total Average of Annual Rt			65,021	31,809	64,513

Attachment COP-I-15-4

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 2002

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1776	1776
		Average of Annual Rt	57,565	57,565
Total Count of Name			1776	1776
Total Average of Annual Rt			57,565	57,565

**Attachment COP-I-15-5**

DATA FOR JANUARY 1, 2003

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2003  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	12		12
		Average of Annual Rt	232,960		232,960
	Key Managers	Count of Name	50	1	51
		Average of Annual Rt	129,212	69,214	128,036
	Mgrs, Supvs & Indiv Contribs	Count of Name	508	7	515
		Average of Annual Rt	73,426	46,590	73,061
	NE Hourly	Count of Name	17		17
		Average of Annual Rt	57,217		57,217
	NE Salaried	Count of Name	296	45	341
		Average of Annual Rt	44,415	25,736	41,950
Total Count of Name			883	53	936
Total Average of Annual Rt			68,716	29,311	66,484

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2003  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part	
			F	Grand Total
PECO-Philadelphia	Key Managers	Count of Name	2	2
		Average of Annual Rt	131,144	131,144
	Mgrs, Supvs & Indiv Contribs	Count of Name	51	51
		Average of Annual Rt	76,190	76,190
	NE Hourly	Count of Name	355	355
		Average of Annual Rt	61,107	61,107
	NE Salaried	Count of Name	44	44
		Average of Annual Rt	56,055	56,055
Total Count of Name			452	452
Total Average of Annual Rt			62,627	62,627

**Attachment COP-I-15-5**

Question 15.c  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2003  
 "Line" or "Field" Employees Located in any Philadelphia Facility

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	249	249
		Average of Annual Rt	60,562	60,562
Total Count of Name			249	249
Total Average of Annual Rt			60,562	60,562

Question 15.d  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2003  
 Located throughout the PECO Service Territory, but NOT in Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Service	Executives	Count of Name	29		29
		Average of Annual Rt	215,624		215,624
	Key Managers	Count of Name	119		119
		Average of Annual Rt	123,256		123,256
	Mgrs, Supvs & Indiv Contribs	Count of Name	1545	9	1554
		Average of Annual Rt	76,977	44,512	76,789
	NE Hourly	Count of Name	1912		1912
		Average of Annual Rt	63,192		63,192
	NE Salaried	Count of Name	365	4	369
		Average of Annual Rt	49,233	24,440	48,965
Total Count of Name			3970	13	3983
Total Average of Annual Rt			70,187	38,336	70,083

**Attachment COP-I-15-5**

**Question 15.e**

**PECO and/or Exelon Employees**

**Regular, Non-Terminated Employees as of January 1, 2003**

**"Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia**

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-PECO	NE Hourly	Count of Name	789	789
		Average of Annual Rt	61,337	61,337
Total Count of Name			789	789
Total Average of Annual Rt			61,337	61,337

**Question 16.a**

**ComEd and/or Exelon Employees**

**Regular, Non-Terminated Employees as of January 1, 2003**

**Located in the City of Chicago**

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
ComEd-Chicago	Executives	Count of Name	45		45	
		Average of Annual Rt	254,831		254,831	
	Key Managers	Count of Name	104	1	105	
		Average of Annual Rt	128,691	175,000	129,132	
	Mgrs, Supvs & Indiv Contribs	Count of Name	676	9	685	
		Average of Annual Rt	76,513	54,614	76,225	
	NE Hourly	Count of Name	1258	58	1316	
		Average of Annual Rt	51,671	30,995	50,760	
	NE Salaried	Count of Name	200	1	201	
		Average of Annual Rt	54,640	30,735	54,521	
	Total Count of Name			2283	69	2352
	Total Average of Annual Rt			66,800	36,159	65,901

**Attachment COP-I-15-5**

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2003**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Flid	Level	Data	Full/Part	
			F	Grand Total
Field-Chicago	NE Hourly	Count of Name	647	647
		Average of Annual Rt	58,980	58,980
Total Count of Name			647	647
Total Average of Annual Rt			58,980	58,980

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2003**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Service	Executives	Count of Name	42		42
		Average of Annual Rt	229,828		229,828
	Key Managers	Count of Name	237		237
		Average of Annual Rt	128,466		128,466
	Mgrs, Supvs & Indiv Contribs	Count of Name	3480	25	3505
		Average of Annual Rt	79,062	46,862	78,832
	NE Hourly	Count of Name	4391	96	4487
		Average of Annual Rt	55,996	31,308	55,468
	NE Salaried	Count of Name	400		400
		Average of Annual Rt	57,986		57,986
Total Count of Name			8550	121	8671
Total Average of Annual Rt			68,340	34,522	67,868

**Attachment COP-I-15-5**

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 2003

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1671	1671
		Average of Annual Rt	60,114	60,114
Total Count of Name			1671	1671
Total Average of Annual Rt			60,114	60,114

# Attachment COP-I-15-6

DATA FOR JANUARY 1, 2004

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2004  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	13		13
		Average of Annual Rt	238,344		238,344
	Key Managers	Count of Name	66	1	67
		Average of Annual Rt	132,286	69,214	131,345
	Mgrs, Supvs & Indiv Contribs	Count of Name	622	1	623
		Average of Annual Rt	76,305	30,963	76,232
	NE Hourly	Count of Name	36		36
		Average of Annual Rt	61,490		61,490
	NE Salaried	Count of Name	294	37	331
		Average of Annual Rt	46,050	27,544	43,981
Total Count of Name			1031	39	1070
Total Average of Annual Rt			72,787	28,700	71,180

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2004  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total	
			F	P		
PECO-Philadelphia	Key Managers	Count of Name	3		3	
		Average of Annual Rt	128,113		128,113	
	Mgrs, Supvs & Indiv Contribs	Count of Name	39		39	
		Average of Annual Rt	76,739		76,739	
	NE Hourly	Count of Name	297		297	
		Average of Annual Rt	63,818		63,818	
	NE Salaried	Count of Name	37		37	
		Average of Annual Rt	59,210		59,210	
	Total Count of Name			376		376
	Total Average of Annual Rt			65,218		65,218

**Attachment COP-I-15-6**

**Question 15.c**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2004**  
**"Line" or "Field" Employees Located in any Philadelphia Facility**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	243	243
		Average of Annual Rt	63,484	63,484
Total Count of Name			243	243
Total Average of Annual Rt			63,484	63,484

**Question 15.d**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2004**  
**Located throughout the PECO Service Territory, but NOT in Philadelphia**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Service	Executives	Count of Name	22		22
		Average of Annual Rt	227,863		227,863
	Key Managers	Count of Name	107		107
		Average of Annual Rt	131,263		131,263
	Mgrs, Supvs & Indiv Contribs	Count of Name	1314	7	1321
		Average of Annual Rt	81,723	49,325	81,551
	NE Hourly	Count of Name	1822		1822
		Average of Annual Rt	66,040		66,040
	NE Salaried	Count of Name	325	3	328
		Average of Annual Rt	51,146	24,435	50,902
Total Count of Name			3590	10	3600
Total Average of Annual Rt			73,367	41,858	73,280

**Attachment COP-I-15-6**

Question 15.e F=Full Time  
 PECO and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2004  
 "Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-PECO	NE Hourly	Count of Name	761	761
		Average of Annual Rt	64,325	64,325
Total Count of Name			761	761
Total Average of Annual Rt			64,325	64,325

Question 16.a F=Full Time  
 ComEd and/or Exelon Employees P=Part-Time  
 Regular, Non-Terminated Employees as of January 1, 2004  
 Located in the City of Chicago Displays:  
 # Employees  
 Average Annual Base Salary

			Full/Part		
Discover Loc	Level	Data	F	P	Grand Total
ComEd-Chicago	Executives	Count of Name	49		49
		Average of Annual Rt	269,375		269,375
	Key Managers	Count of Name	112		112
		Average of Annual Rt	137,180		137,180
	Mgrs, Supvs & Indiv Contribs	Count of Name	606	10	616
		Average of Annual Rt	79,313	61,121	79,017
	NE Hourly	Count of Name	1149	55	1204
		Average of Annual Rt	53,931	32,271	52,942
	NE Salaried	Count of Name	190		190
		Average of Annual Rt	55,683		55,683
Total Count of Name			2106	65	2171
Total Average of Annual Rt			70,833	36,709	69,811

**Attachment COP-I-15-6**

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2004**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-Chicago	NE Hourly	Count of Name	615	615
		Average of Annual Rt	61,480	61,480
Total Count of Name			615	615
Total Average of Annual Rt			61,480	61,480

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2004**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Service	Executives	Count of Name	41		41
		Average of Annual Rt	238,490		238,490
	Key Managers	Count of Name	221		221
		Average of Annual Rt	130,861		130,861
	Mgrs, Supvs & Indiv Contribs	Count of Name	3236	19	3255
		Average of Annual Rt	81,724	53,953	81,562
	NE Hourly	Count of Name	4190	101	4291
		Average of Annual Rt	57,918	33,437	57,342
	NE Salaried	Count of Name	322		322
		Average of Annual Rt	59,867		59,867
Total Count of Name			8010	120	8130
Total Average of Annual Rt			70,550	36,686	70,051

Attachment COP-I-15-6

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 2004

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1521	1521
		Average of Annual Rt	63,178	63,178
Total Count of Name			1521	1521
Total Average of Annual Rt			63,178	63,178

# Attachment COP-I-15-7

DATA FOR JANUARY 1, 2005

Question 15.a  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2005  
 Located at 2301 Market Street, Philadelphia

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
PECO-Market	Executives	Count of Name	14		14
		Average of Annual Rt	222,859		222,859
	Key Managers	Count of Name	62	1	63
		Average of Annual Rt	135,040	71,983	134,039
	Mgrs, Supvs & Indiv Contribs	Count of Name	587	1	588
		Average of Annual Rt	77,994	50,887	77,947
	NE Hourly	Count of Name	36		36
		Average of Annual Rt	63,454		63,454
	NE Salaried	Count of Name	285	16	301
		Average of Annual Rt	46,751	27,762	45,741
Total Count of Name			984	18	1002
Total Average of Annual Rt			74,068	31,503	73,303

Question 15.b  
 PECO and/or Exelon Employees  
 Regular, Non-Terminated Employees as of January 1, 2005  
 Located in Philadelphia, but not 2301 Market Street

F=Full Time  
 P=Part-Time

Displays:  
 # Employees  
 Average Annual Base Salary

Discover Loc	Level	Data	Full/Part	
			F	Grand Total
PECO-Philadelphia	Key Managers	Count of Name	2	2
		Average of Annual Rt	121,823	121,823
	Mgrs, Supvs & Indiv C	Count of Name	38	38
		Average of Annual Rt	78,430	78,430
	NE Hourly	Count of Name	239	239
		Average of Annual Rt	66,250	66,250
	NE Salaried	Count of Name	33	33
		Average of Annual Rt	60,471	60,471
Total Count of Name			312	312
Total Average of Annual Rt			67,478	67,478

**Attachment COP-I-15-7**

**Question 15.c**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2005**  
**"Line" or "Field" Employees Located in any Philadelphia Facility**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Philadelphia	NE Hourly	Count of Name	221	221
		Average of Annual Rt	66,385	66,385
Total Count of Name			221	221
Total Average of Annual Rt			66,385	66,385

**Question 15.d**  
**PECO and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2005**  
**Located throughout the PECO Service Territory, but NOT in Philadelphia**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

			Full/Part			
Discover Loc	Level	Data	F	P	Grand Total	
PECO-Service	Executives	Count of Name	26		26	
		Average of Annual Rt	229,401		229,401	
	Key Managers	Count of Name	121		121	
		Average of Annual Rt	136,789		136,789	
	Mgrs, Supvs & Indiv C	Count of Name	1386		6	1392
		Average of Annual Rt	83,601		47,446	83,445
	NE Hourly	Count of Name	1739			1739
		Average of Annual Rt	68,383			68,383
	NE Salaried	Count of Name	314		4	318
		Average of Annual Rt	52,909		26,173	52,572
	Total Count of Name			3586	10	3596
	Total Average of Annual Rt			76,386	38,937	76,282

**Attachment COP-I-15-7**

**Question 15.e**

**PECO and/or Exelon Employees**

**Regular, Non-Terminated Employees as of January 1, 2005**

**"Line" or "Field" Employees Located through PECO Service Territory, but NOT in Philadelphia**

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Line-Fld	Level	Data	Full/Part	
			F	Grand Total
Field-PECO	NE Hourly	Count of Name	736	736
		Average of Annual Rt	66,714	66,714
Total Count of Name			736	736
Total Average of Annual Rt			66,714	66,714

**Question 16.a**

**ComEd and/or Exelon Employees**

**Regular, Non-Terminated Employees as of January 1, 2005**

**Located in the City of Chicago**

F=Full Time

P=Part-Time

Displays:

# Employees

Average Annual Base Salary

Discover Loc	Level	Data	Full/Part		Grand Total
			F	P	
ComEd-Chicago	Executives	Count of Name	44		44
		Average of Annual Rt	282,993		282,993
	Key Managers	Count of Name	105	1	106
		Average of Annual Rt	137,431	97,301	137,052
	Mgrs, Supvs & Individ C	Count of Name	615	10	625
		Average of Annual Rt	81,042	65,285	80,790
	NE Hourly	Count of Name	1038	40	1078
		Average of Annual Rt	56,525	34,717	55,716
	NE Salaried	Count of Name	178	1	179
		Average of Annual Rt	58,016	32,717	57,874
Total Count of Name			1980	52	2032
Total Average of Annual Rt			73,597	41,761	72,783

**Attachment COP-I-15-7**

**Question 16.b**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2005**  
**"Line" or "Field" Employees Located in City of Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

--	--

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-Chicago	NE Hourly	Count of Name	554	554
		Average of Annual Rt	64,381	64,381
Total Count of Name			554	554
Total Average of Annual Rt			64,381	64,381

**Question 16.d**  
**ComEd and/or Exelon Employees**  
**Regular, Non-Terminated Employees as of January 1, 2005**  
**Located throughout the ComEd Service Territory, but NOT in Chicago**

F=Full Time  
P=Part-Time

Displays:  
# Employees  
Average Annual Base Salary

			Full/Part		
Discover Loc	Level	Data	F	P	Grand Total
ComEd-Service	Executives	Count of Name	47		47
		Average of Annual Rt	237,295		237,295
	Key Managers	Count of Name	230		230
		Average of Annual Rt	133,502		133,502
	Mgrs, Supvs & Individ C	Count of Name	3198	18	3216
		Average of Annual Rt	83,806	55,516	83,648
	NE Hourly	Count of Name	3980	121	4101
		Average of Annual Rt	60,329	35,480	59,596
	NE Salaried	Count of Name	311		311
		Average of Annual Rt	61,253		61,253
Total Count of Name			7766	139	7905
Total Average of Annual Rt			73,272	38,074	72,653

**Attachment COP-I-15-7**

Question 16.e

F=Full Time

ComEd and/or Exelon Employees

P=Part-Time

Regular, Non-Terminated Employees as of January 1, 2005

"Line" or "Field" Employees Located through ComEd Service Territory, but NOT in Chicago

Displays:

# Employees

Average Annual Base Salary

			Full/Part	
Discover Line-Fld	Level	Data	F	Grand Total
Field-ComEd	NE Hourly	Count of Name	1535	1535
		Average of Annual Rt	64,235	64,235
Total Count of Name			1535	1535
Total Average of Annual Rt			64,235	64,235

THE CITY OF PHILADELPHIA  
STATEMENT NO. 1-SUPPLEMENTAL

*Phila TX*  
*9/23/05*

BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION

JOINT APPLICATION OF PECO ENERGY :  
COMPANY AND PUBLIC SERVICE :  
ELECTRIC & GAS COMPANY FOR :  
APPROVAL OF THE MERGER OF :  
PUBLIC SERVICE ENTERPRISE :  
GROUP, INC., WITH AND INTO :  
EXELON CORPORATION :

DOCKET NO. A-110550F0160

DOCUMENT  
FOLDER

SUPPLEMENTAL TESTIMONY

OF

KENT R. MILLER, PH.D.

ON BEHALF OF

THE CITY OF PHILADELPHIA

ON THE COMMISSION'S DIRECTED QUESTIONS

AUGUST 26, 2005

RECEIVED

SEP 26 2005

PA PUBLIC UTILITY COMMISSION  
SECRETARY'S BUREAU

**BEFORE THE  
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

**JOINT APPLICATION OF PECO ENERGY :  
COMPANY AND PUBLIC SERVICE :  
ELECTRIC & GAS COMPANY FOR :  
APPROVAL OF THE MERGER OF : DOCKET NO. A-110550F0160  
PUBLIC SERVICE ENTERPRISE :  
GROUP, INC., WITH AND INTO :  
EXELON CORPORATION :**

**SUPPLEMENTAL TESTIMONY OF  
KENT R. MILLER, PH.D.  
ON BEHALF OF THE CITY OF PHILADELPHIA**

1 **Q. Please state your name.**

2 **A. My name is Kent R. Miller.**

3

4 **Q. Dr. Miller, have you previously testified in this proceeding?**

5 **A. Yes, I submitted Direct Testimony in this proceeding.**

6

7 **Q. Are you aware that two of the Pennsylvania Public Utility Commission ("PUC" or**  
8 **"Commission") Commissioners have set forth "Directed Questions" concerning the**  
9 **feasibility and desirability of dedicating a portion of the Applicants' proposed**  
10 **"virtual divestiture" of nuclear power for economic development purposes?**

11 **A. Yes.**

12

13 **Q. Do you have any experience with such a program?**

14 **A. Yes. As I mentioned in my Direct Testimony, I was employed by New York City from**  
15 **1992 to 1998. Between 1996 and 1998, my responsibilities for New York City included**

1 the administration of a public power economic development program, in which 150 MW  
2 of below-market power was made available to New York City as an economic  
3 development tool.

4  
5 **Q. Please provide the details of this program.**

6 A. The New York City Public Utility Service ("NYCPUS") received an allocation of low-  
7 cost power from the New York Power Authority ("NYPA"). The low-cost power was  
8 used as part of a package of financial incentives, such as tax abatements, for economic  
9 development purposes. These economic development purposes included business  
10 attraction and retention and, more importantly, revitalization of the manufacturing  
11 industry, which was in serious decline at the time.

12  
13 New York City's Economic Development Corporation, which is comparable to the  
14 Philadelphia Industrial Development Corporation ("PIDC"), generally negotiated the  
15 incentive package, although occasionally NYCPUS handled the entire transaction if only  
16 low-cost power was involved. The contract periods varied but ranged from three to seven  
17 years. When NYCPUS was not using its entire allocation, NYPA sold the power on a  
18 short-term basis (and kept the revenue), usually to large manufacturing industries in  
19 upstate New York.

20  
21 **Q. How did NYCPUS come to receive this low-cost power from NYPA?**

22 A. For many years, NYPA used its low-cost hydroelectric power for upstate economic  
23 development customers, but New York City sued and ultimately won an allocation.

1 NYCPUS was created in the 1980s specifically to manage New York City's resulting  
2 power allocation.

3  
4 **Q. Based upon your experiences in New York, do you believe a similar program would**  
5 **be feasible in Pennsylvania using a portion of the nuclear power that PECO plans to**  
6 **"virtually divest"?**

7 A. Yes, I think such a program would be feasible and could bring benefit to customers in the  
8 service territory of PECO Energy Company ("PECO"). I believe that PJM  
9 Interconnection, LLC ("PJM") sets its prices based upon a last-bid-in locational marginal  
10 price ("LMP") construct under which natural gas or coal is typically at the margin setting  
11 the price. Because nuclear power production costs are typically lower than PJM hourly  
12 LMP prices, utilizing the virtually divested nuclear power may result in low-cost power  
13 that could be used to promote economic development.

14  
15 **Q. If the Commissioners' proposal to set aside a share of virtually divested generation**  
16 **for economic development is adopted, do you have an opinion as to how much**  
17 **electricity should be allocated to this program?**

18 A. Based upon my experience here and in New York City, the City of Philadelphia ("City")  
19 would be able to utilize up to 40 MW. I would estimate that Southeastern Pennsylvania's  
20 suburban counties could probably utilize up to 80 MW.

21  
22 **Q. If such a divestiture occurs, how do you think it should be administered?**

1 A. From the viewpoint of administrative efficiency, I think a single program is preferable,  
2 with target allocations for specific geographic areas such as Philadelphia. However, it is  
3 essential that decisions regarding specific power allocations and contract terms be made  
4 locally, not by a state agency. Local involvement is particularly important if low-cost  
5 power allocations are combined with other economic incentives to maximize the overall  
6 economic impact. Since every deal is customized to a specific firm, the transaction costs  
7 are substantial and procedures would need to be put in place to ensure close coordination  
8 between the local economic development agency and the low-cost power program  
9 administrator. In the alternative, the City has some expertise in this area and could  
10 administer its own allocation.

11

12 **Q. Do you have an opinion as to the proper duration of a low-cost power program?**

13 A. Yes. In New York City, a number of years passed before the program was able to fully  
14 utilize its power allocated. In part, this was because the NYCPUS required firm  
15 employment or capital investment commitments from its customers, which limited  
16 participation. Based upon that experience, I believe that a program in PECO's service  
17 territory may not be able to fully utilize its allocation of virtually divested power for  
18 several years.

19

20 Moreover, if the program were implemented for only 10 years, I believe the usefulness of  
21 the program would steadily decline after the fifth year, as newer contracts would have a  
22 progressively shorter term. For that reason, I believe a permanent program would  
23 provide the greatest benefit to the Commonwealth and the City. I would recommend that

1 any program should be in place for at least the length of PECO's proposed virtual  
2 divestiture.

3  
4 **Q. As part of this proceeding, the Commission must determine whether the proposed**  
5 **merger would provide benefits to the public. In your opinion, would the public**  
6 **interest be served by the Applicants dedicating a portion of their "virtually**  
7 **divested" power for public use in economic development?**

8 A. Yes. Economic development is an issue of vital importance to the Commonwealth and to  
9 Philadelphia, both of which have growth rates below other areas of the country. I believe  
10 that the availability of low-cost power can be a valuable tool for attracting and retaining  
11 businesses. As I have stated in previous testimony, the City believes that the tangible  
12 economic benefits in the form of synergy savings are meager at best in comparison to the  
13 problems posed by the merger. We encourage the Commission to enlarge these public  
14 benefits by ordering PECO to set aside a block of "virtually divested" nuclear power for  
15 economic development purposes.

16  
17 **Q. If the Commissioners' proposal is adopted, in what geographic areas do you believe**  
18 **it would be appropriate to use the virtually divested power for economic**  
19 **development?**

20  
21 A. A statewide program is a good idea, and I am certain that the Commonwealth could make  
22 good use of much more than the 120 MW or so I have proposed. However, in this

1 merger proceeding, I believe it would be more equitable and more easily defensible for  
2 the Commission to focus the program within PECO's service territory.

3  
4 **Q. The two Commissioners have also asked whether the combination of the PSE&G**  
5 **gas division with the PECO gas division and the Philadelphia Gas Works would**  
6 **provide critical mass for a viable, profitable, shareholder owned public utility,**  
7 **assuming a revenue stream from off-system sales from an LNG facility and separate**  
8 **resolution of the problem of PGW's debt. What is the City's position on this**  
9 **question?**

10 A. The City believes that such a combination could be viable and that it deserves serious  
11 consideration, whether as a shareholder-owned utility or otherwise. The City's primary  
12 concern is the cost and quality of service to PGW's customers, and there may be a strong  
13 business case for a combination. To determine this would require a detailed examination  
14 of the costs and benefits. The City is willing to cooperate fully with the applicants and  
15 the PUC in such an evaluation.

16  
17 **Q. What benefits could a combination offer?**

18 A. I believe there could be economic benefits from a business combination. For example, if  
19 PGW were merged with PECO's gas division, there could be significant synergies since  
20 many functions are duplicated such as legal services, customer billing, and gas  
21 purchasing. Furthermore, the combined businesses may be able to purchase gas on more  
22 favorable terms, with the caveat that there may be some gas market issues that must be

1 addressed. There may also be financial advantages to the combination from PGW's LNG  
2 plant, and its potential expansion.

3  
4 **Q. Given the schedule of this proceeding, do you think it realistic that the joint**  
5 **applicants can conduct their due diligence evaluation of a business combination with**  
6 **PGW without unduly delaying the PUC action?**

7 A. Well, there would likely be some delay given the current schedule. However, the joint  
8 applicants have considerable financial and intellectual resources at their disposal. From  
9 the City side, I can say that we are prepared to cooperate in every way on this matter. We  
10 recognize that this may be a unique opportunity to provide for the long-run stability of  
11 gas service to Philadelphia customers.

12  
13 **Q. Do you have any ideas on how PGW's large debt load might be handled?**

14 A. Yes. I think it can be viewed, at least in part, as a stranded cost. If some of the debt were  
15 securitized on favorable terms, with repayment by Philadelphia customers, the joint  
16 applicants may be more inclined to combine with a financially weak business. Also, it  
17 may be that the repayment costs are less over the long-run than PGW could guarantee on  
18 its own without government backing or direct subsidy.

19  
20 **Q. Does this complete your testimony at this time?**

21 A. Yes.