



On November 5, 2018, Responses were filed by Commission Staff, the Illinois Competitive Energy Association, and RESA. RESA took the position that ComEd's proposed bill message was not a "legitimate consumer education effort" within the meaning of the Commission's Integrated Distribution Rules (83 Ill. Admin. Code Part 452). RESA recommended that the Commission deny the petition and that ComEd file for a waiver of the rules.

Staff's Response supported ComEd's petition and requested that the Commission issue a declaratory ruling. (Staff Response, p.6) ICEA's Response took the position that ComEd's proposal violates Subsection 452.240 (a) of the Commission's rules and does not fall into the exception under Subsection 452.240 (b). ICEA recommends that the Commission deny the petition, but grant ComEd an "immediate waiver" to allow it to utilize its proposed bill message on customers' bills. (ICEA Response, p. 2)

RESA agrees with ICEA that ComEd's proposal violates Subsection 452.240 (a) and does not fall within the Subsection 452.240 (b). While RESA originally took the position that ComEd should not be granted a waiver in this proceeding, RESA will not oppose ICEA's position that ComEd be granted an immediate waiver in this proceeding. Further, in the aftermath of the resolution of ComEd's proposal to publish a PTC message on the customer bill, RESA encourages the Commission to consider a comprehensive review of the validity of the TC, as currently structured, as a shopping comparison tool for customers as well as a measuring stick of market performance for stakeholders.

WHEREFORE, for the foregoing reasons, the Retail Energy Supply Association requests that the Commission deny Commonwealth Edison Company's request for a declaratory ruling that its proposed PTC bill message does not violate the Commission's Integrated Distribution Company rules, but does not oppose the granting of an immediate waiver in this proceeding.

Dated: November 14, 2018

Respectfully submitted,

Retail Energy Supply Association

By: /s/GERARD T. FOX  
Gerard T. Fox

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**NOTICE OF FILING**

Please take note that on November 14, 2018, I caused to be filed via e-docket with the Chief Clerk of the Illinois Commerce Commission, the attached Response of the Retail Energy Supply Association in this proceeding.

/s/GERARD T. FOX  
Gerard T. Fox

**CERTIFICATE OF SERVICE**

I, Gerard T. Fox, certify that I caused to be served copies of the foregoing Response of the Retail Energy Supply Association upon the parties on the service list maintained on the Illinois Commerce Commission's eDocket system for the instant docket via electronic delivery on November 14, 2018.

/s/ GERARD T. FOX  
Gerard T. Fox