

**DIRECT TESTIMONY**

**of**

**Scott A. Struck**

**Accounting Department**

**Financial Analysis Division**

**Illinois Commerce Commission**

**Commonwealth Edison Company**

**Proposal to implement a competitive procurement process by establishing Rider  
CPP, Rider PPO-MVM, Rider TS-CPP and revising Rider PPO-MI**

**Docket No. 05-0159**

**June 8, 2005**

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1 **WITNESS IDENTIFICATION**

2 **Q. Please state your name and business address.**

3 A. My name is Scott A. Struck. My business address is 527 East Capitol Avenue,  
4 Springfield, Illinois 62701.

5 **Q. By whom are you employed and in what capacity?**

6 A. I am currently employed as a Supervisor in the Accounting Department of the  
7 Financial Analysis Division of the Illinois Commerce Commission (“ICC” or the  
8 “Commission”).

9 **Q. Please describe your background and professional affiliations.**

10 A. I hold a Bachelor of Science in Accounting from Southern Illinois University at  
11 Carbondale. I am a Certified Public Accountant, licensed to practice in the State  
12 of Illinois, and a member of the American Institute of Certified Public  
13 Accountants. I joined the staff of the Illinois Commerce Commission (“Staff”) in  
14 June 1990. Prior to joining Staff, I was employed as an accountant in public  
15 accounting for two years and in industry for one year.

16 **Q. Have you previously testified before any regulatory body?**

17 A. Yes, I have testified on several occasions before the Commission.

18 **PURPOSE OF TESTIMONY**

19 **Q. What is the purpose of your testimony in this proceeding?**

20 A. The purpose of my testimony is to propose additional tariff language that clarifies  
21 that the Supply Administration Charge and the adjustment for supply-related  
22 uncollectible costs of Commonwealth Edison Company (“the Company” or  
23 “ComEd”) will be established by the Commission in the Company’s future electric  
24 rate cases.

25 **PROPOSED TARIFF LANGUAGE**

26 **Supply Administration Charge**

27 **Q. Please explain your understanding of the Supply Administration Charge.**

28 A. The Supply Administration Charge is set forth in Rate BES-NRB as a fixed  
29 amount that is applied to the customer each monthly billing period. (ComEd Ex.  
30 7.5, Original Sheet No. XE) The Supply Administration Charge is incorporated  
31 into Rider PPO-MVM by reference to ComEd’s tariff for bundled service. (ComEd  
32 Ex. 7.2, Original Sheet No. 295)

33 **Q. What additional tariff language do you propose regarding the Supply**  
34 **Administration Charge?**

35 A. In order to clarify that the Supply Administration Charge will be an amount  
36 established by the Commission in the Company’s electric rate cases, I propose

37 the following change to the tariff language of RATE BES-NRB, Original Sheet  
38 No. XE:

39 **Supply Administration Charge**  
40 The Supply Administration Charge is applicable to the customer in each  
41 monthly billing period and is equal to \$XXX.XX. This amount will be an  
42 amount established by the Commission in the Company's subsequent  
43 electric rate cases.

44 I also propose the following change to the tariff language of RIDER PPO – MVM,  
45 Original Sheet Nos. 295:

46 **Supply Administration Charge**  
47 Each customer served hereunder shall pay a Supply Administration  
48 Charge in each monthly billing period equal to the Supply Administration  
49 Charge defined in the tariff for bundled service that would otherwise be  
50 applicable to the customer were it taking bundled electric service from the  
51 Company. This charge will be an amount established by the Commission  
52 in the Company's subsequent electric rate cases.

53  
54 For the purposes of determining the appropriate Supply Administration  
55 Charge for a customer served hereunder, such customer's applicable  
56 customer class for the monthly billing period, as described in the Charges  
57 section of the Rates and Charges part of Rate RCDS, shall be used.

58 **Adjustment for Supply-Related Uncollectible Costs**

59 **Q. Please explain your understanding of the adjustment for supply-related**  
60 **uncollectible costs.**

61 A. The Supply Charges under Rider PPO- MVM (ComEd Ex. 7.2, Original Sheet  
62 No. 296) and Rate BES-NRB (ComEd Ex. 7.5, Original Sheet Nos. XD and XE)  
63 are to include an adjustment for the supply-related uncollectible costs of the  
64 Company.

65 **Q. What additional tariff language do you propose regarding the adjustment**  
66 **for supply-related uncollectible costs of the Company?**

67 A. In order to clarify that the adjustment for supply-related uncollectible costs of the  
68 Company will be an amount established by the Commission in the Company's  
69 electric rate cases, I propose the following changes to the tariff language of  
70 RATE BES-NRB, Original Sheet Nos. XD and XE:

71 **Supply Charges**

72 Supply Charges are applicable to the kWhs provided to the customer in  
73 the monthly billing period as follows:

74 **Non-Time of Use**

75 For a customer for which the Watt-Hour, Small Load, or Medium Load  
76 Customer Supply Group is applicable, the Summer Supply Charge and  
77 the Nonsummer Supply Charge for such group shall be applicable to each  
78 kWh provided to the customer in each monthly billing period included in  
79 the Summer Period and the Nonsummer Period, respectively. The  
80 Summer Supply Charge and Nonsummer Supply Charge are equal to the  
81 respective charges computed in accordance with the equations provided  
82 in the Non-Time of Use Supply Charges - CPP Auction-Blended Segment  
83 subsection of the Supply Charge Computation section of the Translation to  
84 Retail Charges part of Rider CPP, adjusted for supply-related uncollectible  
85 costs of the Company. This adjustment for supply-related uncollectible  
86 costs will be an amount established by the Commission in the Company's  
87 subsequent electric rate cases.

88 For a customer for which the Large Load Customer Supply Group is  
89 applicable, and for which metering equipment that does not determine the  
90 time at which kWhs are provided is installed at one or more points of  
91 service at such customer's premises, the Summer Supply Charge and the  
92 Nonsummer Supply Charge for such group shall be applicable to each  
93 kWh provided to the customer via such metering equipment in each  
94 monthly billing period included in the Summer Period and the Nonsummer  
95 Period, respectively. The Summer Supply Charge and Nonsummer Supply  
96 Charge are equal to the respective charges computed in accordance with  
97 the equations provided in the Non-Time of Use Supply Charges - CPP  
98 Auction-Blended Segment subsection of the Supply Charge Computation  
99 section of the Translation to Retail Charges part of Rider CPP, adjusted

100 for supply-related uncollectible costs of the Company. This adjustment for  
101 supply-related uncollectible costs will be an amount established by the  
102 Commission in the Company's subsequent electric rate cases.

103 **Time of Use**

104 For a customer for which the Large Load Customer Supply Group is  
105 applicable, the Summer Peak Supply Charge and Summer Off-Peak  
106 Supply Charge for such group shall be applicable to each kWh determined  
107 to be provided to the customer during Peak Periods and Off-Peak Periods,  
108 respectively, in each monthly billing period included in the Summer Period.  
109 The Nonsummer Peak Supply Charge and the Nonsummer Off-Peak  
110 Supply Charge for such group shall be applicable to each kWh determined  
111 to be provided to the customer during Peak Periods and Off-Peak Periods,  
112 respectively, in each monthly billing period included in the Nonsummer  
113 Period.

114 The Summer Peak Supply Charge, the Summer Off-Peak Supply Charge,  
115 the Nonsummer Peak Supply Charge, and the Nonsummer Off-Peak  
116 Supply Charge are equal to the respective charges computed in  
117 accordance with the equations provided in the Time of Use Supply  
118 Charges – CPP Auction-Blended Segment subsection of the Supply  
119 Charge Computation section of the Translation to Retail Charges part of  
120 Rider CPP, adjusted for supply-related uncollectible costs of the  
121 Company. This adjustment for supply-related uncollectible costs will be an  
122 amount established by the Commission in the Company's subsequent  
123 electric rate cases.

124 I also propose the following change to the tariff language of RIDER PPO – MVM,

125 Original Sheet Nos. 296:

126 **Supply Charges**

127 Supply Charges apply to the kilowatt-hours (kWhs) supplied hereunder by  
128 the Company in the monthly billing period delivered under the provisions  
129 of Rate RCDS. Supply Charges for each customer taking service  
130 hereunder shall be determined in accordance with the Supply Charge  
131 Computation section of the Translation to Retail Charges part of Rider  
132 CPP, based upon the Customer Supply Group applicable to the customer  
133 as provided in Rider CPP. Supply Charges applicable hereunder will  
134 include an adjustment for supply-related uncollectible costs of the  
135 Company. This adjustment for supply-related uncollectible costs will be an  
136 amount established by the Commission in the Company's subsequent  
137 electric rate cases.

138 **THE PROPOSED TARIFF LANGUAGE IS CONSISTENT WITH THE**  
139 **COMPANY'S STATED INTENTIONS**

140 **Q. Is your proposed language consistent with the Company's stated**  
141 **intentions about when the Supply Administration Charge and the**  
142 **adjustment for supply-related uncollectible costs of the Company would be**  
143 **established?**

144 A. Yes. ComEd panel witnesses Lawrence S. Alongi and Paul R. Crumrine indicate  
145 that both the Supply Administration Charge and the adjustment for supply-related  
146 uncollectible costs of the Company would be set in a future rate case. (ComEd  
147 Ex. 7.0, page 23, lines 513-523)

148 **WHY THE PROPOSED TARIFF LANGUAGE IS APPROPRIATE**

149 **Q. Why do you believe these changes are appropriate?**

150 A. These changes would make it clear from the tariff documents themselves that the  
151 Supply Administration Charge and the adjustment for supply-related uncollectible  
152 costs of the Company will be amounts established by the Commission in the  
153 Company's electric rate cases. This would alleviate the need to refer to Company  
154 testimony or Commission orders in order to determine how these items would be  
155 established.

156 **CONCLUSION**

157 **Q. Does this question end your prepared direct testimony?**

158 **A. Yes, it does.**