

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY :
 :
Petition to determine the applicability of : No. 08-0044
Section 16-125(e) liability to events caused :
by the December 23, 2007 storm front. :

Direct Testimony of
KEVIN B. BROOKINS
Vice President,
Distribution System Operations

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1 **I. Introduction**

2 **A. Identification of Witness**

3 Q. Please state your name and business address.

4 A. My name is Kevin B. Brookins. My business address is 2 Lincoln Centre, 10th Floor,
5 Oakbrook Terrace, Illinois 60181.

6 Q. By whom and in what position are you employed?

7 A. I am Vice President, Distribution System Operations for Commonwealth Edison
8 Company (“ComEd”).

9 **B. Summary of Testimony and Conclusions**

10 Q. What subjects does your testimony address?

11 A. I address ComEd’s response to the interruptions resulting from the storm system that
12 moved across its service territory on December 23, 2007 (“December 23 Storm System”).

13 Q. What, in summary, does testimony conclude?

14 A. Although the December 23 Storm System developed rapidly and greatly exceeded
15 forecasted strength and impact, ComEd was prepared and was able to dispatch the
16 resources required to support a timely and effective restoration effort.

17 **C. Background and Qualifications**

18 Q. Mr. Brookins, what are your current duties and responsibilities for ComEd?

19 A. As Vice President of Distribution System Operations, I am responsible for operating
20 ComEd’s electrical distribution system, which is one of the largest electrical distribution
21 systems in the U.S., serving about 3.8 million customers throughout Northern Illinois.

22 Q. Prior to your current position, what other positions did you hold at ComEd?

23 A. Prior to becoming Vice President of Distribution System Operations in April 2008, I
24 served in a number of key positions, including Vice President, Work Management &
25 New Business; Vice President, Customer Field Operations, for both ComEd and PECO;
26 Director of Construction and Maintenance in ComEd's Chicago Region; and Director of
27 Regional Operations in ComEd's Southeast Region. In these positions, I was able to
28 improve New Business customer satisfaction ratings; increase the productivity and safety
29 record of meter reading, field services, and meter services; and reduce the interruption
30 frequency in Chicago as well as the city's south suburbs.

31 Earlier in my career, I held various engineering positions and supervised design
32 engineers, including reviewing and approving electric distribution facilities at Navy Pier
33 and the United Center. I became a Customer Design and Construction Superintendent
34 responsible for new service connections on the north half of Chicago including the
35 downtown area. As Electric Supplier Services Manager, I negotiated retail access rules
36 with suppliers, consumer groups, and other interested parties at the Illinois Commerce
37 Commission in preparation for retail customers choosing a supplier other than ComEd.
38 Finally, I began my career as a ComEd corporate planning analyst.

39 All together, I have spent my entire 25-year career working for ComEd and other
40 Exelon Corporation business units in a variety of positions.

41 Q. What is your educational background?

42 A. I hold a Bachelor of Science Degree in Electrical Engineering from Howard University in
43 Washington, D.C. and an MBA from Governors State University in University Park, Ill.

44 **II. Restoration Efforts**

45 Q. Can you please describe the weather conditions that occurred on December 23, 2007?

46 A. According to the National Weather Service, on December 22-23, 2007:

47 An intense low pressure system tracked from the Texas panhandle to near
48 Chicago, and then to upper Michigan This storm dumped around 4
49 inches of snow in extreme northwest Illinois. Elsewhere in Illinois, only
50 around an inch of snow was reported, but the snow was mixed with
51 freezing rain and sleet. In fact, portions of westcentral Illinois had ice
52 accumulations of up to ¼ inch. Behind the storm system, west winds
53 gusted to 50 mph. This led to considerable blowing and drifting snow
54 with near blizzard conditions in extreme northwest Illinois for a time on
55 Sunday December 23. May roads were closed especially in areas where
56 the heaviest snow fell.

57 Q. Did ComEd have advance notice of the December 23 Storm System?

58 A. No. This event developed rapidly and its severity greatly exceeded forecast expectations.
59 Indeed, the first official weather warnings ComEd received did not come in until
60 overnight on the 22nd/23rd and they initially warned only of 20-30 mph sustained winds
61 and gusts of 45 mph.

62 Q. When did the December 23 Storm System begin affecting ComEd's service territory?

63 A. According to the final OE-417 Report filed with the Department of Energy on December
64 25, 2007, the December 23 Storm System moved into ComEd's service territory at
65 approximately 1 am and ended at approximately 11 pm. In fact, the December 23 Storm
66 System was much more severe than predicted, as discussed by other witnesses.

67 Q. Was ComEd nonetheless prepared to respond to the outages resulting from the December
68 23 Storm System?

69 A. Yes. On Friday, December 21st, an augmented staffing plan was developed in
70 recognition of the upcoming holiday period and what was then a more moderate

71 predicted windstorm. Although the severity of the December 23 Storm System exceeded
72 any predicted impact, ComEd was able to deploy its own crews as well as crews from
73 Missouri, Wisconsin, and Ohio to respond. A total of 39 foreign crews were secured
74 from five companies. ComEd utilized 76 employees, 20 crews and 1 independent
75 contractor from Illinois; 60 employees, 16 crews and 1 independent contractor from
76 Missouri; 14 employees, 4 crews and 1 independent contractor from Wisconsin.; 40
77 employees, 11 crews and 1 independent contractor from Ohio.

78 Q. How does ComEd ensure the competency of foreign crews?

79 A. According to existing contracts, contractors are required to provide competent and
80 qualified personnel, which is defined as

81 Contractor shall employ and cause each Subcontractor to employ
82 competent, appropriately trained, and experienced employees for the Work
83 to be performed. Contractor shall have full responsibility for the conduct
84 of all employees employed on or in connection with the Work (including
85 employees of any Subcontractor) and will ensure that there is adequate,
86 daily supervision of all Work. Contractor shall be familiar with and
87 observe established and accepted labor practices, procedures, and project
88 agreements.

89 Furthermore, they are required to maintain “all professional qualifications,
90 licenses, permits, certifications and skills and appropriately complete all training required
91 by applicable Laws or advisable to perform [such work].”

92 Q. How did ComEd dispatch crews in response to the December 23 Storm System?

93 A. ComEd prioritizes its dispatch of crews and equipment during extreme weather using an
94 established process, as detailed in its Storm Restoration Process Procedure, EP-ED-1001.
95 Once ComEd’s Call Center receives an outage report from a customer, an outage ticket is
96 created. Outage tickets are assessed by Operations Control Center and prioritized.

97 Outage tickets for potential electrical contact, structure files, and other hazardous
98 conditions were dispatched first. The larger plan allowed for restoring feeder lockouts
99 first and then device, transformer and service outages.

100 ComEd's procedures follow a "cut & run" process whereby first responders
101 restore customers by cutting wire in the clear, closing breakers at the station and field
102 switching to pick up load. Field patrols were performed to determine more extensive
103 damage on the remaining portion of the circuit/feeder that is not restored to identify
104 damage and materials needed. Vegetation crews were dispatched to remove trees and
105 limbs and Construction crews to make repairs as needed.

106 Q. What other efforts did ComEd undertake to speed the restoration process?

107 A. The Emergency Operations Center Team activated additional response procedures such
108 as Incident Command and Staging sites. Due to the extensive number of crews that were
109 called in, additional dispatching and work package preparation capabilities were required
110 to keep crews actively restoring customers. The Incident Command and Staging sites
111 were established in extensive or heavily damaged areas. At the Incident Command site,
112 restoration work was performed in a systematic approach, by feeder rather than by ticket.
113 Foreign crews that were not familiar with the ComEd system were assigned to a ComEd
114 Feeder single point of contact to perform restoration. Material was staged at the Incident
115 Command site and/or delivered to job sites which reduced crew travel times.

116 Q. Was ComEd's response to the interruptions timely and effective?

117 A. Yes. ComEd responded to the interruptions in a timely and effective manner. 90% of the
118 approximately 209,000 customers affected were restored within 10 hours from losing

119 power. Given the nature and scope of the damage, this was an effective and timely
120 restoration effort.

121 Q. Does this complete your direct testimony?

122 A. Yes.