

**STATE OF ILLINOIS  
ILLINOIS COMMERCE COMMISSION**

Illinois Commerce Commission	)	
On Its Own Motion	)	
	)	
Adoption of report concerning the 2007	)	09-0379
reliability performance of	)	
Commonwealth Edison Company	)	
pursuant to 83 Ill. Adm. Code 411.140	)	

**Response of Commonwealth Edison Company to  
“Illinois Commerce Commission Assessment of Commonwealth Edison Company  
Reliability Report and Reliability Performance for Calendar Year 2007”**

Commonwealth Edison Company (“ComEd”), submits this response to the report of the Commission Staff dated July 24, 2009, and entitled “Illinois Commerce Commission Assessment of Commonwealth Edison Company Reliability Report and Reliability Performance for Calendar Year 2007”

ComEd would like to thank Staff for providing a valuable assessment of its 2007 Annual Reliability Report. ComEd takes Staff’s assessment seriously and would like to take this opportunity to respond to concerns raised by Staff in the Executive Summary and Summary of Recommendations. ComEd is pleased to report that many of the metrics Staff listed in the 2007 Assessment showed improvement from 2007 to 2008. These improvements were included in the 2008 Annual Reliability Report and are restated below.

**I. Concerns.**

ICC Staff highlighted concerns on page i of the Executive Summary of the report. ComEd’s response follows each of the Staff concerns restated below in bold.

## **Residential customer satisfaction is down**

The results from ComEd's annual residential customer satisfaction survey showed the mean rating improved on 13 of 14 measures in 2008. *(Source: ComEd 2008 Annual Reliability Report Introduction, pg 2)*

For residential customers, 12 of 14 measures improved significantly from 2000 to 2008, three measures improved significantly from 2001 to 2008, and three measures improved significantly from 2007 to 2008. *(Source: ComEd 2008 Annual Reliability Report Section G, pg 10)*

## **Customer complaints are up.**

In 2008, customer reliability complaints decreased 28 percent when compared to 2007. The total number of customer reliability complaints in 2008 is the lowest on record dating back to 1998. *(Source: ComEd 2008 Annual Reliability Report Section G, pg 14)*

## **Customers experiencing large numbers of interruptions are up.**

In 2008, there were 13 percent fewer customer outages in the ComEd service territory as compared to 2007. This is despite the fact 2008 was marked by several severe storms from tornados to an ice storm. During 2008, ComEd customers experienced 1.33 outages overall, down 13 percent from 1.53 outages per customer in 2007. This included an 11 percent improvement in non-storm related outages or the equivalent of 387,000 fewer customer interruptions than in 2007. *(Source: ComEd 2008 Annual Reliability Report Introduction, pg 1)*

## **Interruptions are at their highest since 1998.**

In 2008, the total number of outages decreased by more than 5 percent system wide and in every region except Southern when compared with 2007. Southern region's total outages increased 7 percent, primarily due to the ice storm on December 19, 2008, which resulted in 845 outages, affecting approximately 82,000 customers. Prior to the ice storm, Southern region had 4 percent fewer outages in 2008 than 2007 for the same time period. *(Source: ComEd 2008 Supplemental Annual Reliability Report Section 1)*

## **System Average Interruption Frequency Index (SAIFI) is at its highest since 1998 and is the worst of the four largest electric utilities in Illinois.**

As stated above, there is a significant improvement in customer outages during 2008, as compared to 2007 even though the year was marked by numerous severe storms ranging from tornados to an ice storm All four ComEd regions

experienced improvement in SAIFI compared to 2007. (Source: 2008 Annual Reliability Report Section H, pg2)

ComEd's non-storm SAIFI improved 11 percent or the equivalent of 387,000 fewer customer interruptions than in 2007. All four ComEd regions experienced improvement in non-storm SAIFI compared to 2007. (Source: 2008 Annual Reliability Report Section H, pg2)

**Total number of ComEd employees and contractors has declined by 15 percent since 1999.**

ComEd is continually identifying and evaluating ways to improve operating efficiencies and internal processes. This is an ongoing effort that includes changes in how ComEd allocates its resources. The future investment plan will incorporate these efficiencies. (Source: ComEd 2008 Annual Reliability Report Section A, pg A-1)

**II. Recommended Actions.**

In the Staff assessment report (page 42), Staff offered the following recommended actions. ComEd's response follows below each staff recommendation.

**Staff should continue regular inspections in 2009 of conditions in the field (including tree conditions) coupled with monitoring emerging spending patterns as well as indicators of efficiency improvements. (Section 9)**

As in the past years, ComEd is willing to support ICC Staff, as requested, during their inspections and monitoring activities.

**ComEd should continue its focus on improving customer service. (Section 7)**

ComEd agrees with Staff that continuing to focus on improved customer service is a priority. ComEd has been pursuing a number of activities to accomplish this end, as summarized below.

In 2008 significant improvements were made to the ComEd external web site. Improvements included displays explaining outage restoration protocol and types of events that cause the majority of outages. An outage map was developed to display the number of outages by office. A text notification pilot is also underway to allow customers to receive outage information via a text device.

ComEd continues to provide customers with the status of restoration efforts through an automated system. When a customer requests information about a particular outage, the automated system retrieves information about that outage from the dispatch system, and then conveys that information to the customer.

To minimize the inconvenience caused by unplanned interruptions during restoration efforts when the region experiences heightened activity (for example, during storms), the Operations Control Center provides enhanced information to affected customers and municipalities. ComEd has incorporated a communications protocol into its Emergency Preparedness Response Process and has a dedicated communications expert at the Emergency Operations Center (EOC) located at the Operations Control Center.

In 2008, additional enhancements were completed to the Mobile Command Vehicle. New technology allowed ComEd to improve the speed of its satellite feed, thereby improving the company's ability to manage outages during storm restoration. ComEd continued to improve its ability to provide customers with accurate ETRs during storms. By making changes to the Outage Management System (OMS), ComEd can modify ETRs based on the type of weather being experienced on the system. The changes can be made by members of the OCC without engaging members of the Information Technology (IT) group. As in the past, if the service territory experiences a significant storm, the new ETR tool will provide area specific ETRs, overriding system generated ETRs. Individuals calling into ComEd's Voice Response Unit (VRU) system will hear the most current ETR available.

ComEd's interactive VRU was upgraded in 2008. When customers call 1-800-Edison-1, the reporting of an outage is the first choice in the main menu. In many cases, ComEd can provide the customer with real time estimated restoration times. In addition, depending on the status of the outage, customers can now also receive information about the status of restoration efforts such as whether the outage has been analyzed, if a crew has been dispatched, and if the crew has arrived on site. In September 2007, ComEd implemented a new feature known as virtual hold. During peak call periods, callers will receive the option to stay on the line or hang up and receive a return call in the same amount of time as if they stayed on hold.

ComEd continued its support of eOutage. This is an electronic reliability tracking system, which gives municipalities a supplemental resource to directly communicate with ComEd. In an effort to provide municipalities with up to date storm information, the Large Customer Services (LCS) organization has started using a paging program called "Send Word Now." The program allows for instant notification to more than 1,200 contacts regarding the extent of outages on the system as well as on-going restoration efforts. *(Source: 2008 Annual Reliability Report Section C, pg 1-2)*

**ComEd should continue its efforts in implementing the tree replacement program associated with “the right tree in the right place” near its power lines. (Section 7)**

ComEd continues to work with customers and municipalities to promote planting “the right tree in the right place” to avoid future tree/utility conflicts. Arbor Day activities supported by ComEd further this type of education to many groups and organizations throughout the service territory. *(Source: 2008 Annual Reliability Report Section G, pg G-6)*

**ComEd should assure that it meets and continues to meet the requirements of NESC Rule 218 throughout its service territory by assuring that all trees near its overhead electric lines are trimmed such that there are no tree contacts with its energized primary conductors before it returns to trim them again. (Section 7)**

ComEd continues to comply with NESC Rule 218 as adopted in the ICC’s rules for Construction of Electric Power and Communications Lines [83 Ill. Adm. Code 305] as it relates to distribution and transmission line vegetation management. ComEd has specific clearance guidelines by voltage that take into consideration line sag, sway (blow out), IEEE: Institute of Electrical and Electronics Engineers minimum air gap clearances, and tree growth over the maintenance cycle.

ComEd recently enhanced its existing Vegetation Management Program by adjusting the maintenance guidelines to include the removal of overhanging vegetation on 34 kV lines. ComEd has also improved its distribution cyclical maintenance programs by establishing tree removal targets to reduce the number of fast growing trees. ComEd implemented a revised refusal resolution process resulting in a 61% reduction in outstanding refusals. Contractor oversight for vegetation management activities has been enhanced by including vegetation quality audits within ComEd’s Reliability Engineering Department.

**ComEd should review and correct as appropriate the comprehensive quality control and management oversight of ComEd’s vegetation management programs. (Appendix E)**

ComEd has enhanced its multilayered quality assurance approach to its vegetation management program. Multiple departments participate in quality audits of recent tree trimming activities. The results are reviewed monthly by management. Results and photos are shared and stored on an internal web page. ComEd’s third party contractor continues to perform 100 percent quality assurance reviews of all tree-trimming cycle maintenance work, including distribution and transmission. *(Source: 2008 Annual Reliability Report Section Introduction, pg 1)*

ComEd’s Vegetation Management Transmission department has implemented several process improvements. The Inspection process is managed span by span

with GPS verification including conductor to vegetation measurement with laser range finder. This includes the QA inspections as well as the annual inspections. All work planning for the 2009 cycle is collected and tracked to completion electronically with Work Planning software. (Source: 2008 Annual Reliability Report Section Introduction, Section G, pg 6)

**ComEd should provide an explanation and plans to correct Southern Region deficiencies in future Reliability Reports. (Section 8)**

From a historical point of view, ComEd's Southern Region has been affected by more thunderstorms when compared to other ComEd regions between 2003 and 2006. There have been 766,000 lightning strokes recorded in Southern Region during this time period. In comparison for the same time period, Chicago Region had 44,000 strokes, Northeast Region had 103,000 strokes and Northwest Region had 745,000 strokes.

In 2008 SAIFI performance improved for Southern region by 7 percent despite an ice storm in December that impacted 82,000 customers. This positive improvement in reliability performance was a result of ComEd's extensive analysis of failure modes and programs that are based on this analysis. Southern region improved by 13 percent and is the best performance since 2002. (Source: 2008 Annual Reliability Report, H, pg 2)

In 2008, the total number of outages decreased by over 5 percent system wide and in every region, except Southern, when compared with 2007. Southern region's total outages increased 7 percent, primarily due to the ice storm on December 19, 2008, which resulted in 845 outages, affecting approximately 82,000 customers. Prior to the ice storm, Southern region had 4 percent fewer outages in 2008 than 2007 for the same time period. (Source: 2008 Annual Reliability Report – Supplemental, pg 1)

Pursuant to the Commission's order in this docket, a copy of this response is being served on the Director of the Energy Division of the Commission.

Dated: September 21, 2009

Respectfully Submitted,



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