IIEC Exhibit 5.1

STATE OF ILLINOIS

ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY	:	
	:	No. 98-0894
Petition for Order Concerning	:	
Delineation of Transmission and	:	
Local Distribution Facilities	:	

TESTIMONY OF

MICHAEL F. BORN, P.E.

DISTRIBUTION SYSTEM PLANNING ENGINEER
TRANSMISSION AND DISTRIBUTION PLANNING DEPARTMENT
COMMONWEALTH EDISON COMPANY

ComEd Exhibit 1

L42605-2

Q: Please state your name and business address.

A: Michael F. Born. My business address is 1319 South First Avenue, Maywood, Illinois.

Q: By whom and in what position are you employed?

A: I am employed by Commonwealth Edison Company ("ComEd") as its Distribution System Planning Engineer in the Transmission and Distribution Planning Department which is part of the Asset Management and Planning organization.

Q: What is the purpose of your testimony in this proceeding?

A: The purpose of my testimony is to explain why ComEd is requesting an order concerning the delineation of its transmission and distribution facilities, what rules apply to such delineation, and how ComEd has applied these rules.

Professional Qualifications & Experience

Q: Please describe your educational background.

A: I received a Bachelor of Science Degree in Electrical Engineering from Purdue University in 1971. I have also taken a number of post-graduate courses in power engineering from the Illinois Institute of Technology.

Q: Are you licensed as a Professional Engineer in the State of Illinois?

A: Yes. I have been a Licensed Professional Engineer in the State of Illinois since 1976.

Q: Please describe your responsibilities as ComEd's Distribution System Planning Engineer.

A: I supervise the professional engineers and planners responsible for the evaluation and planning of modifications, reinforcements, upgrades, and expansions to ComEd's distribution network and to the portions of ComEd's transmission system which supply it, system-wide. Among other things, my group is responsible for analysis of reported and

23 forecast loads on various portions of ComEd's system (including both transmission
24 substations and the transmission-distribution centers and distribution centers which
25 supply electricity to the lower-voltage distribution system) in order to assess whether
26 there is, or will be, a need to add to, or change, the system in order to better serve our
27 customers.

28 Q: Please briefly describe the prior positions you have held at ComEd.

29 A: In my over 27 years at ComEd, I have served in a wide variety of transmission and
30 distribution engineering and planning roles. Early in my engineering career at ComEd, I
31 worked in a Division Engineering office and at the System Technical Center planning
32 and evaluating various distribution systems, including both lines and substations.

33 Subsequently, I served as District Engineer for the DeKalb District. As District
34 Engineer, I was responsible for all of the engineering operations in the District, including
35 those relating to the planning and maintenance of the distribution service. I also
36 supervised the various field engineers assigned to the District.

37 In 1978, I became the Planning Supervisor for the Northern Division. As
38 Planning Supervisor, I was responsible for overseeing the adequacy of the distribution
39 system throughout the entire Northern Division, which includes the north and northwest
40 suburbs of Chicago. My duties included the evaluation of existing distribution systems,
41 including both lines and substations, and the planning of reinforcements, upgrades, and
42 expansions where required to serve our customers.

43 In 1983, I transferred to ComEd's headquarters, as a Senior Engineer in the
44 System Planning Department. Thereafter, in 1988, I was promoted to Section Engineer

in charge of the Distribution Planning Section of the System Planning Department, which position I held until 1993, when I became ComEd's Substation Planning Engineer as a result of centralizing distribution planning activities. As ComEd's Substation Planning Engineer, I had duties similar to those which I previously held, but in connection with a variety of distribution capacity enhancement projects. Recently, the Distribution Planning and Reliability Department has been replaced by the Transmission and Distribution Planning Department and I have been given responsibility for oversight of the planning for capacity-related distribution reinforcements and distribution-supply projects.

Q: Have you served as a member of any professional organizations, committees, or task forces, relating to electrical engineering?

A: I am currently a Senior Member of the Institute of Electrical and Electronics Engineers, commonly known as "IEEE," and am a Member of the IEEE Power Engineering Society. I have served on the Electric Power Research Institute Task Force studying methods of evaluating and planning generating capacity expansion. I also served for several years on the Working Group of the Mid-America Interconnected Network, commonly known as "MAIN," that assessed adequacy of generating capacity.

Q: Have you taught any courses or seminars in electrical engineering, electric system planning, and electric line planning and design?

A: Yes. I have taught Engineering Economics courses to numerous engineers and accountants. The courses in Engineering Economics I have taught cover topics including

the analysis of engineering alternatives and the calculation of the cost and present value of revenue requirements of capital projects.

Q: Are you familiar with ComEd's electrical transmission and distribution systems?

A: Yes. Through my various experiences with ComEd, I have become familiar with the components of these systems and how they functionally affect the flow of power through ComEd's system and to ComEd's customers.

Q: Please provide a general description of the transmission and distribution facilities that comprise ComEd's system.

A: ComEd's current transmission system contains the following major components: generating station terminals; bulk power transmission substations ("TSS's"); non-bulk power TSS's; transmission distribution centers ("TDC's"); electric service stations ("ESS's"); the 765 kV subsystem; the 345 kV subsystem; the 138 kV bulk power subsystem; the 138 kV non-bulk power subsystem; the 69 kV subsystem; and various other facilities.

Q: Were you involved with the preparation of ComEd's proposed delineation of its transmission and local distribution which is the subject of this proceeding?

A: Yes, I was. I was involved in developing the guidelines used by ComEd to reclassify its facilities as either transmission or distribution, and supervised the project to apply these guidelines on an asset by asset basis.

85 **What is Refunctionalization?**

86 Q: What is ComEd seeking approval of in this proceeding?

87 A: ComEd is asking the Illinois Commerce Commission ("Commission" or "ICC") to
88 approve ComEd's proposed delineation of its transmission and local distribution
89 facilities. Such delineation is sometimes referred to as the "refunctionalization" of
90 transmission and distribution. In this case, refunctionalization has involved the
91 reclassification of electric utility assets previously classified as "transmission" to a
92 classification consistent with the primary function of the asset. Historically, ComEd
93 classified transmission assets based on voltage level alone, as a simplified proxy for the
94 function of the asset.

95 Q: Why is refunctionalization important?

96 A: Refunctionalization will more accurately divide a utility's assets between production
97 (generation), transmission, and local distribution for the purposes of determining which
98 regulator (i.e., the FERC or the ICC) has jurisdiction. Which regulator has jurisdiction
99 over an asset and the recovery of costs related to it is often a function of its
100 functionalization.

101 Refunctionalization is also important so that customers using distribution and
102 transmission services will be appropriately charged for the use of those assets that are
103 necessary to provide the services they are using. Inconsistent classification of assets
104 could result in charges for the use of assets not required to provide the requested service,
105 or the failure to charge for assets that are, in fact, being used. This is particularly true
106 under an open access environment. Before open access, all retail electric utility

customers used components of both the transmission and distribution system as part of the utility's bundled service. Since most customers utilized both functions of the utility system, Illinois could set state-jurisdictional rates based upon both classes of assets, with an allowance for rates set by FERC, and inconsistent asset classification did not result in imposing an unfair responsibility for costs on particular customers. In an open access environment, not all customers will be using the transmission and distribution assets equally. In fact, some transmission customers, such as those not serving load connected to the ComEd system (e.g., Wisconsin Electric), would use only transmission assets for their transactions. In other cases, certain parties may be responsible for only portions of the total transmission and distribution charges. If transmission and distribution assets are not properly classified, transmission customers may end up paying for facilities or services not used to provide transmission service, and visa versa.

Q: Why is ComEd seeking to refunctionalize its transmission and distribution assets at this time?

A: Under the recent Illinois deregulation legislation, the first phase of retail access will begin on October 1, 1999. At that time, utilities will begin offering delivery services to certain customers, which services include those necessary for the transmission and distribution systems to function so that customers can receive electric power and energy from suppliers other than the utility. It is my understanding that the ICC will have the authority to review, approve, and modify the prices, terms, and conditions of those components of delivery services that are not subject to the jurisdiction of the FERC. Because the FERC has authority over a utility's transmission facilities and services, it is

necessary to draw the line between transmission and local distribution facilities and services. It is important that both the FERC and the ICC approve the same delineation so that there is no over-recovery or under-recovery of costs for certain assets. ComEd is seeking approval of its proposed refunctionalization at this time so that there will be sufficient time also to obtain FERC approval prior to October 1, 1999. The direct testimony of Mr. Steven T. Naumann provides, among other things, a more detailed description of the FERC ratemaking process.

The Seven-Factor Test

Q: How should the line be drawn between transmission and local distribution facilities and services?

A: Illinois utilities (and the ICC) should apply the seven-factor test established by the FERC to delineate transmission and local distribution facilities. In Order No. 888, the FERC established seven indicators of what facilities are local distribution, which indicators are to be evaluated on a case-by-case basis. These indicators, commonly referred to as the "Seven-Factor Test," are:

1. Local distribution facilities are normally in close proximity to retail customers;

2. Local distribution facilities are primarily radial in character;

3. Power flows into local distribution systems; it rarely, if ever, flows out;

4. When power enters a local distribution system, it is not reconsigned or transported on to some other market;

5. Power entering a local distribution system is consumed in a comparatively restricted geographical area;

6. Meters are based at the transmission local distribution interface to measure flows into the local distribution system; and

7. Local distribution systems will be of reduced voltage.

Q: Why should the ICC apply the Seven-Factor Test?

A: The division between transmission and local distribution facilities and services also serves as the division between FERC and ICC jurisdiction. It is important that this line be drawn consistently by both regulators. As I understand it, FERC has established this test as the boundary of its jurisdiction, under federal law. And, it is my understanding that the FERC will defer to the delineation recommended by the state utility commission so long as the proposed allocation is consistent with the Seven-Factor Test.

ComEd's Application of the Test

Q: Has ComEd applied the Seven-Factor Test to its transmission and local distribution facilities?

A: Yes.

Q: How did ComEd apply this test?

A: There were several steps involved in determining the proper allocation of ComEd's assets under the Seven-Factor Test. First, ComEd worked in cooperation with other Illinois utilities to develop guidelines for implementation of the Seven-Factor Test in delineating their transmission and local distribution facilities. These guidelines are reflected in the document entitled "White Paper Regarding General Guidelines for Delineation of Transmission and Local Distribution Facilities," which is attached to the Petition in this Docket (the "Illinois White Paper"). Because of the size and configuration of ComEd's

181 system, individual power flow analyses of each specific component was not practical or
182 necessary. Therefore, ComEd developed a more detailed methodology, consistent with
183 the Illinois White Paper, for classifying its assets which took into account the various
184 characteristics of ComEd's specific systems and facilities. The final phase of this process
185 was the actual application and classification of ComEd's services and facilities on an
186 asset by asset basis.

187 Q: How was the Illinois White Paper developed?

188 A: In response to FERC Order No. 888 and the upcoming establishment of open access in
189 Illinois, Illinois utilities created a task force to develop general guidelines to assist and
190 guide Illinois utilities and the ICC in separating electric transmission facilities from local
191 distribution facilities. ComEd representatives participated in this task force. The Illinois
192 White Paper is the product of this task force. The utilities submitted the White Paper to
193 the Commission's Manager of the Energy Division on July 15, 1998 with full consensus
194 of all members of the Illinois Task Force.

195 Q: Please describe the purpose and general concepts of the Illinois White Paper?

196 A: The purpose of the Illinois White Paper is to provide a reasonably common basis to
197 define utilities' transmission and distribution systems under the Seven-Factor Test. This
198 will encourage consistency and uniformity within Illinois where reasonable so that the
199 composite facilities of the State's transmission system will consist of facilities possessing
200 common functional characteristics. In preparing the Illinois White Paper, the task force
201 assessed each of the FERC's seven factors in conjunction with generally accepted
202 engineering practices and conventional utility analysis. The White Paper recognizes that

utility-specific application of the seven factors may produce a different determination for some facilities at the same voltage level, but that the assessment should produce consistent results from utility to utility. Consequently, FERC jurisdictional entities operating within Illinois can be expected to apply FERC's seven-factor test under substantially the same guidelines.

Q: Please describe the detailed methodology that ComEd developed from the guidelines contained in the White Paper.

A: Following completion of the Illinois White Paper, ComEd developed internal guidelines, consistent with the FERC seven-factor test and the Illinois White Paper that would permit reclassification of existing transmission assets that are used for a local distribution function. These guidelines are based on standard system designs, configurations and voltage levels in use on the ComEd system. These guidelines are intended to assist ComEd engineers in classifying assets practically, consistently, and in a manner that meets the requirements of the Seven-Factor test. These guidelines outline which assets, or portions of assets, should be classified as Production (**P**), Transmission (**T**). or Distribution (**D**). The major points of the ComEd guidelines are:

1. All network bulk power through circuits are considered **T**. The bulk power grid includes 765, 345 and 138 kV lines, substation buses, transformers connecting these voltage levels, and associated control and protective relay equipment that are connected electrically in such a manner as to allow electricity to flow continuously from one point of the grid to another, i.e., a connection between Transmission Sub Stations (TSS's).

2. Typically the **P**, **T** or **D** demarcation point will occur at a bus or circuit connection point. These connection points may occur at a generating station, TSS or Transmission Distribution Center (TDC) bus, or a tap point on a transmission line.

3. All 69 kV lines and the 138-69 kV transformers that supply them are classified as **D**. This recognizes that the existing bulk power network in Chicago was converted to a radial system in December 1998. It also recognizes that the Rockford 69 kV system, which has been referred to as a network, was designed as a radial system with looped backfeed.

4. Radial load taps are **D**. This includes 138 and 345 kV taps of any length, one span to several miles, to one or more TDC's and/or Electric Service Stations (ESS's). An ESS is a substation located on a customer's property that supplies only that customer. Examples would include the tap to York Center and Oakbrook TDC's, Bolingbrook TDC, Abbott Labs ESS, etc. Any radial tap supplying a single customer is **D**, no matter what direction power may be flowing.

5. Cases where inconsequential flow-through is possible during normal system operation does not automatically make the asset **T**. An example is a TDC where two 12.5 kV buses, each connected to individual 138-12.5 kV transformers (one connected to the 138 kV red system, the other to the blue system) are connected by a normally closed circuit breaker. The resultant high impedance path restricts significant power flow to other system terminals.

6. Cases where backfeed is possible during abnormal system operation does not automatically make the asset **T**. An example is a TDC where the three 138 kV circuit switches are closed, tying the red and blue 138 kV lines while switching. Any flow-through resulting from this configuration is not the purpose of this installation.

7. The classification of plant assets should be based on each asset's planned use within the next five years. For example the current radial 138 kV feed to Oakbrook TDC should be considered **D** since any potential tie through the bulk power grid is beyond the five-year window. In the future it may be necessary to reclassify assets due to changes in system function.

8. A lower voltage network tie between two bulk power transmission facilities that is installed for the reliable, efficient operation of the local distribution system is classified as **D**. This network is designed to provide support and reliability to the local distribution system, not for flow-through. Examples of this type of installation include the 34 kV network circuit, between North Aurora and Electric Junction TSS's, which feeds Batavia and the 34 kV interconnection with Illinois Power at Troy Grove.

9. Production facilities (**P**) will include the generator, step-up transformer and high side switch, and auxiliary power facilities for the generator as

connected to transmission or distribution facilities. For example, the connection point for the Quad Cities unit and auxiliary power transformer is at the Quad Cities 345 kV ring bus.

10. In the event that generation is installed on a **D** category circuit, i.e. distributed generation connected to a 138 kV radial circuit, the circuit will remain **D** as long as the minimum load on the **D** circuit exceeds the net output of the generating facility. For example, if the 50 MW output of a waste-to-energy plant connected to a 138 kV radial circuits supplying more than one customer is less than the minimum load of the ComEd or other substations connected to the same lines, the 138 kV radial circuits would be **D**. If the output exceeds the minimum load of the ComEd or other substations, then the 138 kV radial circuits would be classified as **T**, except for the portion between the generator and the first upstream local distribution connection.

11. Right of Way ("R.O.W.") should be placed in the classification that it is associated with; i.e. R.O.W. for a bulk power through circuit(s) is **T** and R.O.W. for a tap to a radial TDC is **D**. In cases where the R.O.W. is shared by several circuits, then the asset should be prorated appropriately, i.e. the percentage of transmission (**T**) circuits operating at 138 kV or above versus the percentage of distribution (**D**) circuits operating at 69 kV or above on the same stretch of R.O.W. Distribution circuits below 69 kV that are attached to 138 kV or above structures are not to be considered. Lower voltage distribution pole lines and cables, regardless of the number of circuits, installed on the R.O.W. do not change the apportionment for the R.O.W. unless it was specifically purchased wider for their installation. If such is the case, then the **D** portion of the R.O.W. cost is increased by the incremental cost of the additional width.

12. The cost of structures/hardware that are installed to accommodate both distribution and transmission facilities must be allocated to each particular classification. The incremental cost to accommodate the distribution facilities is **D**. For example, the cost for a double circuit structure with one distribution facility and one transmission facility or a transmission facility with an under-built facility would be the difference between the installed cost and what it would have cost if only the transmission portion was installed.

13. Some assets need to be classified as **P**, **T**, or **D** facilities. If an asset is shared between classifications, it must be prorated appropriately, e.g. protective relay or communication equipment will be prorated on the basis of the percentage of **T** facilities served or connected versus that of **D** facilities. The common equipment for a relay scheme between two TSS's

and a radial TDC would be prorated two-thirds **T** and one-third **D**. The relays at each substation would be classified the same as the substation.

14. Facilities designated as inventory or spare equipment would be classified by their intended use or prorated if it could be used in several classifications.

Q: Why did ComEd develop rules for allocating its transmission and distribution assets rather than conducting an individual power flow analysis?

A: ComEd developed and applied detailed guidelines for several reasons. Because of the size of ComEd's system, the number of individual components involved, and the number of permutations of power flows on those components, conducting individual power flow studies of each specific component is not practical, nor is it necessary to determine the functional use of each component. For example, radially configured portions of the system, supplying retail loads, are clearly used only for local distribution, hence further analysis is not needed. As FERC recognized with its Seven-Factor Test, the application of various functional criteria is appropriate for determining whether assets are used for transmission or local distribution.

Q: After ComEd had developed this detailed methodology for allocating its assets, were you involved in the actual application and classification of ComEd's facilities and services on an asset by asset basis?

A: Yes.

Q: Please describe this process.

A: ComEd's Plant Accounting Department generated detailed spreadsheets from ComEd's general ledger systems which listed all of ComEd's transmission assets. These

spreadsheets were then given to ComEd's Asset Management & Planning Department. I coordinated the effort to apply ComEd's detailed reclassification guidelines to the assets contained in these documents. For each asset, we determined whether the asset should be classified as production ("P"), Transmission ("T"), Distribution ("D"), or a combination thereof. We then updated the spreadsheets with percentages reflecting this allocation.

Description of the Results

Q: Please describe ComEd's generating station terminals and how they have been classified.

A: These substations are located at ComEd-owned generating stations and provide for the delivery of energy from a generator step-up transformer to transmission lines. These substations contain equipment operating at 765, 345 and 138 kV. These terminals have not been reclassified and will continue to be classified as Transmission. However, at some locations, generator step-up transformers had been classified as Transmission facilities. All generator step-up transformers will be reclassified as Production facilities, as mandated by FERC.

Q: Please describe ComEd's bulk power transmission substations (TSS's) and how they have been classified.

A: A bulk power TSS is a terminal at which power is received from the transmission system for delivery with or without transformation to other transmission lines. These do not include those locations where one or two transmission lines are sectionalized with a circuit breaker to provide diversity of supply to transformers serving 34 kV or 12.5 kV distribution systems. These substations contain equipment operating at 765, 345, and/or 138 kV. These terminals continue to be classified as Transmission because power

flowing to the terminal is transported to other network terminals. Indeed, these facilities fail most of the FERC indicators for local distribution.

Q: Please describe ComEd's non-bulk power transmission substation and how they have been classified.

A: A non-bulk power TSS is a terminal where energy is transformed from 69 or 138 kV lines to the 34 or 12.5 kV distribution system. At some locations, bulk power and non-bulk power equipment are located within the same substation. The demarcation occurs at the connection (e.g., a switch or circuit breaker) between the bulk power facilities and the transformer or circuit supplying the distribution system. These terminals have been reclassified as Distribution since all seven FERC indicators of local distribution are present.

Q: Please describe ComEd's transmission distribution centers ("TDC's") and how they have been classified.

A: A TDC is a substation where 69 or 138 kV energy is transformed and delivered to the 12.5 kV distribution system. A TDC is essentially a non-bulk power TSS that only supplies 12.5 kV distribution circuits. These terminals have been reclassified as Distribution.

Q: Please describe ComEd's electric service stations ("ESS's") and how they have been classified.

A: ESS's are substations supplied by 345, 138 or 69 kV lines where energy is transformed to a lower voltage for use by a single customer of the delivery system. These terminals continue to be classified as Distribution. Each of the FERC seven indicators is present at

an ESS. The facility is in close proximity to the customer; in fact, these substations are located on the customer's property. Step down transformers are either operated radially or, if normally tied on the customer side, are incapable of permitting significant power flow elsewhere on the transmission system. Even in the case where a customer having generating facilities may deliver some power to the transmission system, the customer would require use of distribution facilities for back-up power in the event of a generator outage. In the case where incoming transmission lines are normally connected together through a high voltage bus, the bus and connections to those transmission lines would be considered Transmission. Installations of this type are rare on ComEd's system.

Q: Please describe ComEd's 765 kV system and how it has been classified.

A: The 765 kV system consists of 765 kV lines and bilk-power substations. These elements connect various generating station terminals and bulk power TSS terminals and interconnect with other utilities' transmission systems. They will continue to be classified as Transmission because none of the FERC distribution indicators are present.

Q: Please describe ComEd's 345 kV subsystem and how it has been classified.

A: The 345 kV system consists of 345 kV lines and bulk-power substations. These elements will continue to be classified as Transmission as none of the FERC distribution indicators are present.

Q: Please describe ComEd's 138 kV bulk power subsystem and how it has been classified.

A: The 138 kV bulk power system contains 138 kV lines and substations whose purpose is to delivered power and energy to other 138 kV lines. Because none of the FERC

distribution indicators are present, these elements also will continue to be classified as Transmission.

Q: Please describe ComEd's 138 kV non-bulk power subsystem and how it has been classified.

A: The 138 kV non-bulk power subsystem consists of 138 kV lines that connect the bulk power 138 kV system to substations that supply the 34 or 12.5 kV distribution system. The demarcation between transmission and local distribution systems occurs at the point of connection (e.g., a disconnecting device such as a switch) between the line supplying the distribution system and the bulk power facilities. These elements have been reclassified as Distribution because all seven FERC indicators of local distribution are present. These facilities are close to the retail customer, are primarily radial in character, and are used for power flow to distribution circuits supplying retail customers. Power is neither consigned nor transported to other areas, is consumed within the local service territory of the distribution substation area, is metered as power flows into the distribution circuits, and is used to supply lower voltage (34 kV or 12.5 kV) distribution circuits.

Q: Please describe ComEd's 69 kV system and how it has been classified.

A: This system contains substations with 138 - 69 kV step-down transformers and 69 kV circuit breakers, 69 kV lines and substations with 69 - 12.5 kV transformers. With the recent retirement of 69 kV facilities connecting Ridgeland TSS, Crawford Generating Station, Fisk Generating and Jefferson TSS, there are no 69 kV facilities that perform a transmission function. All power flowing on 69 kV facilities is toward 69 - 12.5 kV transformers. This subsystem has been reclassified as Distribution because it is radial in

character, the direction of power flow is toward retail customers, and the consumption of power is delivered over a limited geographic area.

Q: Please describe ComEd's other major transmission facilities and how they have been classified.

A: Some of ComEd's generator step-up transformers and related connecting equipment that were historically classified as transmission assets, will be reclassified as production assets for consistency with their function and with recent FERC decisions.

Q: How will the refunctionalization affect ComEd's existing distribution plant?

A: ComEd's 34, 12.5 and 4 kV lines and feeders, 34 - 12.5 kV substations and 34 - 4 kV substations will continue to be classified as Distribution. The function they perform falls within the definition of local distribution under the Seven-Factor Test. This subsystem is a lower voltage, radially configured system where power is consumed in a limited geographic area.

Q: How is common property treated in substations?

A: Some TSS locations contain both bulk power and non-bulk power (138-34 and 138-12.5 kV) facilities. ComEd used property records to identify whether specific pieces of equipment were used exclusively for transmission or distribution, and such equipment has been classified as such. Other property units utilized for both functions have been classified in proportion to the overall function of the substation.

Q: Please summarize how this reclassification procedure has allocated ComEd's facilities that operate at 69 kV and above?

A: The following table summarizes this information:

453 Summary of Facilities Currently Classified as Transmission

Substations	Prior to Refunctionalization		After Refunctionalization	
Function	TSS & TDC substations	Transformer Capacity (MVA)	TSS & TDC substations	Transformer Capacity (MVA)
Transmission	237	51,073	29	24,660
Distribution			160	26,413
Combined			48	
Total	237	51,073	237	51.073

454

Lines	Prior to Refunctionalization		After Refunctionalization	
Function	138 kV line (circuit miles)	69 kV line (circuit miles)	138 kV line (circuit miles)	69 kV line (circuit miles)
Transmission	2737	185	2085	
Distribution			652	185
Total	2737	185	2737	185

455

456 In addition, maps reflecting this allocation across ComEd's system are attached to my

457 testimony as Attachment MFB-1.

458 Q: Has ComEd summarized these reclassifications by FERC account?

459 A: Yes. These results are discussed in the direct testimony of Charles N. Godbout.

460 Q: Does this conclude your direct testimony?

461 A: Yes.