

List of Issues & Major Conclusions

- Address issues raised by Staff, the Department of Energy (“DOE”), and Illinois Industrial Energy Consumers (“IIEC”) regarding the distribution loss study.
- Address Staff’s proposal relating to ComEd’s elimination of the use of railroad electric facilities.

1 **I. Introduction**

2 **A. Identification of Witness**

3 **Q. What is your name and business address?**

4 A. My name is Michael F. Born. My business address is Two Lincoln Centre, Oakbrook
5 Terrace, Illinois 60181-4260.

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

7 A. I am employed by Commonwealth Edison Company (“ComEd”) in the position of
8 Principal Engineer in the Distribution Capacity Planning Department.

9 **Q. Are you the same Michael Born who provided rebuttal testimony in this
10 proceeding?**

11 A. Yes. My rebuttal testimony is ComEd Ex. 34.0.

12 **B. Purposes of Surrebuttal Testimony**

13 **Q. What are the purposes of your surrebuttal testimony?**

14 A. I respond to the rebuttal testimony of Staff witness Greg Rockrohr regarding the
15 Distribution System Loss Study and ComEd’s use of railroad electric facilities. I also
16 address the rebuttal testimonies of DOE witnesses Dwight Etheridge and Kirk Patterson
17 and the rebuttal testimony of IIEC witness Robert Stephens regarding the Distribution
18 System Loss Study.

19 **C. Purposes of Surrebuttal Testimony**

20 **Q. What are the attachments to your surrebuttal testimony?**

21 A. I have two attachments. ComEd Ex. 67.1 updates ComEd Ex. 34.1, which reflected the
22 Distribution System Loss Study originally submitted as ComEd Ex. 8.3 Rev. ComEd Ex.

23 67.2 updates ComEd Ex. 34.2, which reflected the Distribution System Loss Study
24 originally submitted as ComEd Ex. 20.1 Rev. ComEd 20.1 Rev. is an alternative to the
25 Distribution System Loss Study presented in ComEd Ex. 8.3 Rev. that reflects the
26 alternative primary/secondary analysis and associated exemplar delivery classes
27 presented by Mr. Alongi in ComEd Ex. 21.0 Rev.

28 **II. Distribution System Loss Study**

29 **Q. Did the revised Distribution System Loss Studies that were attached to your rebuttal**
30 **testimony as ComEd Exs. 34.1 and 34.2, satisfy Mr. Rockrohr's concerns?**

31 A. Yes, in two respects. These revised studies addressed his concerns that the initial studies
32 misrepresented losses in services of certain customer classes and misallocated losses to
33 the dusk-to-dawn lighting class when reconciling peak losses. Staff Ex. 21.0, 18:379-
34 383. However, Mr. Rockrohr still expresses a concern regarding the completion of a
35 revised transmission study and subsequent update of the distribution loss factors. ComEd
36 witness Lawrence Alongi addresses the filing of revised ICC jurisdictional tariffs to
37 reflect updates of the distribution loss factors (ComEd Ex. 68.0).

38 **Q. Are you submitting updated Distribution System Loss Studies?**

39 A. Yes. To address issues raised by the DOE witnesses Dwight Etheridge (DOE Ex. 1.0)
40 and Kirk Patterson (DOE Ex. 2.0), I have revised the Distribution System Loss Studies,
41 which are attached as ComEd Ex. 67.1 and ComEd Exhibit 67.2. In particular, a
42 customer category titled "HV DLF=0" has been added to represent those customers
43 metered at 138kV and higher that have no material distribution losses because there are
44 no step-down transformers or significant conductor losses between the transmission
45 system and the meter location.

46 Q. **Do Messrs. Etheridge and Patterson agree with the revised Distribution System Loss**
47 **Study?**

48 A. Yes. In rebuttal testimony, Mr. Etheridge states that “it is a reasonable study for the
49 purposes of setting distribution loss factors in this case.” DOE Ex. 3.0, 3:16-17. Mr.
50 Patterson states in rebuttal testimony that his concerns were addressed and the “revised
51 distribution loss study satisfies [his] recommendation that a revised loss study be
52 prepared.” DOE Ex. 4.0, 3:11-13.

53 Q. **Has any other witness raised a concern with the Distribution System Loss Studies?**

54 A. Yes. IIEC witness Robert Stephens recommends that the average of no load and full load
55 loss percentages for HV ESS and 138-60 TSS transformers be calculated as MVA-
56 weighted averages. IIEC Ex. 5.0, 35:753-770.

57 Q. **Do you agree with Mr. Stephens?**

58 A. Yes. I have revised the Distribution System Loss Studies accordingly. These changes
59 are reflected in ComEd Ex. 67.1 and ComEd Ex. 67.2.

60 **III. ComEd’s Use of the Railroad Class Customer Facilities**

61 Q. **Does Mr. Rockrohr continue to argue that ComEd should eliminate all use of the**
62 **railroad electric facilities?**

63 A. Yes. Staff Ex. 21.0, 19:403-22:474.

64 Q. **How do you respond?**

65 A. Mr. Rockrohr has presented no evidence demonstrating operational difficulty with the
66 current configuration at railroad tracking substations. Power flow through railroad
67 equipment is a consequence of the type of service that the Railroad customers had since

68 they took ownership of the breakers and power conversion equipment over 50 years ago.
69 Further, Railroad customers have requested comparable service for addition and upgrades
70 of their system. Please see the surrebuttal testimony of Mr. Alongi (ComEd Ex. 68.0) for
71 further discussion of Staff's proposal as compared to ComEd's proposed cost allocation
72 adjustment.

73 **Q. CTA/Metra witness James Bachman testifies in part that in eliminating ComEd's**
74 **use of railroad electric facilities, the more reasoned approach is "to change the**
75 **operation of the traction power substations when new ones are added or existing**
76 **ones are renovated and the costs justify the change." CTA/Metra Ex. 2.0, 16:355-**
77 **358. Do you agree?**

78 **A.** Yes. I believe that the CTA/Metra position that conversion to open loop feeder
79 configuration would be a good long term solution to be implemented as existing delivery
80 points are updated or replaced and for new delivery points rather than on a fixed time
81 schedule as proposed by Mr. Rockrohr.

82 **Q. Does this complete your surrebuttal testimony?**

83 **A.** Yes.