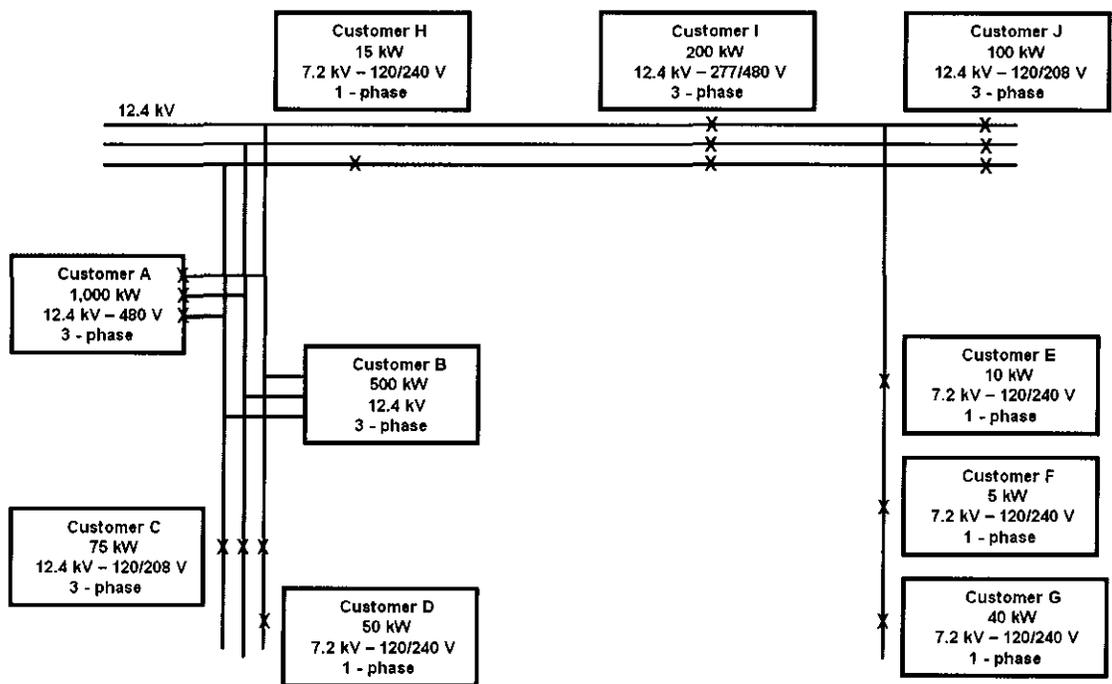


Data Request No. 3.01 (Continued):

Customer	IIEC Proposes Customer Cost Responsibility for Cost of Black Circuit	IIEC Proposes Customer Cost Responsibility for Cost of Red Circuit	IIEC Proposes Customer Cost Responsibility for Cost of Blue Circuit
A			
B	X	X	
C			
D			
E			
F			
G			
H			
I			
J			



Response:

Mr. Stowe relies on certain assumptions in responding to this question. These assumptions are:

- 1) Based on information provided in ComEd's question, Mr. Stowe assumes that both Customers A and B are served via an ESS and that, in both cases, the ESS resides on the customer's premises. Therefore, Mr. Stowe assumes that the red lines that run from the red branch circuits to the Customer A & B boxes, enter the customers' premises at the primary voltage shown, 12.4 kV. Therefore, the lines entering the premises of both Customers A and B are at primary voltage (i.e., both Customers A and B are primary customers).
- 2) Consistent with the above, Mr. Stowe assumes that for all other customers, i.e., Customers C through J, the lines entering the customers' premises are at the voltage on the low side of the referenced transformer, represented by the Xs shown. The

IIEC Response to Data Request No. 3.01 (Continued):

transformers represented by the Xs are assumed to be ComEd transformers that perform the transformation indicated by the voltage changes shown for each customer – e.g., for Customer C, ComEd performs a 12.4 kV to 120/208 V transformation before the customer connection shown.

- 3) Mr. Stowe further assumes that the black main line circuit and the red and blue branch circuits, where the voltage transformation occurs for the rest of the customers, do not “enter the customers’ premises” at a primary voltage, since the depiction of the customer connection in those figures differs from what is shown for Customers A and B. Therefore, Mr. Stowe assumes that Customers C through J are secondary customers.
- 4) Finally, Mr. Stowe assumes that the voltage level of a customer is the voltage of the lines entering the customers’ premises, consistent with the way ComEd charges for MKD of customers in the High Voltage Delivery Class and as included in the “exemplar” Primary Voltage Delivery Class rates.

Based on the assumptions stated in ComEd’s question, as well as those stated by Mr. Stowe above, Mr. Stowe answers as follows:

Customer	IIEC Proposes Customer Cost Responsibility for Cost of Black Circuit	IIEC Proposes Customer Cost Responsibility for Cost of Red Circuit	IIEC Proposes Customer Cost Responsibility for Cost of Blue Circuit
A	X	X	
B	X	X	
C	X	X	X
D	X	X	X
E	X	X	X
F	X	X	X
G	X	X	X
H	X	X	X
I	X	X	X
J	X	X	X

To clarify Mr. Stowe’s conclusion, he adds the following:

Mr. Stowe notes that both primary and secondary customers utilize the black, three-phase, main line circuit and red, three-phase branch circuit, but only secondary customers use the blue, single-phase branch circuit. In addition, at page 40 of its order in Docket No. 08-0532, the Commission directed ComEd to provide function based definitions of service voltages for facilities. Mr. Stowe interpreted this to mean that ComEd should define facilities as “primary” when those facilities function to serve primary and secondary customers, and as “secondary” when those facilities, such as the blue line circuit, function to serve only secondary customers.

Mr. Stowe’s conclusion therefore, with reference to the diagram provided by ComEd as part of this question, is that the costs associated with single-phase primary distribution facilities, such as those illustrated in the diagram by the blue lines, should be allocated only to secondary customers, since those facilities serve only secondary customers. (See Mr. Stowe’s Direct Testimony at 14:321-15:323). Costs associated with three-phase facilities, such as those illustrated in the diagram by the red or black lines, should be allocated to both primary and secondary customers.