ComEd Ex. 18.0

# STATE OF ILLINOIS

# ILLINOIS COMMERCE COMMISSION

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| COMMONWEALTH EDISON COMPANY | : | |
| | : | No. 11-0721 |
| Formula rate tariff and charges authorized by | : | |
| Section 16-108.5 of the Public Utilities Act | : | |

Rebuttal Testimony of

**MICHAEL F. BORN, P.E.**

Principal Engineer
Distribution Capacity Planning
Commonwealth Edison Company

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# I. Introduction

## A. Witness Identification

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

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

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

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

Q. **Are you the same Michael F. Born who provided direct testimony in this proceeding?**

A. Yes.

## B. Summary of Testimony

Q. **What is the purpose of your rebuttal testimony?**

A. The purpose of my rebuttal testimony is to respond to the direct testimony of Staff witness Greg Rockrohr (Staff Exhibit ("Ex.") 11.0) regarding ComEd's proposed Distribution System Loss Study, ComEd Ex. 7.1.

Q. **In brief, what conclusions do you make?**

A. In short, the Illinois Commerce Commission ("Commission") should approve ComEd's proposed Distribution System Loss Study, ComEd Ex. 7.1.

## II. Distribution Loss Study

Q. **Do you agree with Staff witness Mr. Rockrohr's recommendation that the Commission adopt the Distribution Loss Study that was filed on the Commission's e-Docket system in this proceeding on December 21, 2011 as Study Report #7B (Staff Ex. 11.0, 8:141-145)?**

A. No. ComEd Ex. 7.1, ComEd's proposed Distribution System Loss Study, reflects the Distribution System Loss Study approved by the Commission just eight months ago in ComEd's last rate case (ICC Docket No. 10-0467, ComEd Ex. 67.2). Further, it has been updated for 2010 class loads for this formula rate proceeding. The only difference between ComEd's proposed Distribution System Loss Study, ComEd Ex. 7.1, and the Distribution System Loss Study submitted as Study Report #7B pursuant to the Order in ICC Docket No. 10-0467 is that Study Report #7B uses the results of the updated transmission loss study that the Commission directed ComEd to complete by the end of 2011. However, it is my understanding that rate design is not at issue in this proceeding as explained further in the rebuttal testimony of ComEd witness Dr. Hemphill (ComEd Ex. 11.0). As Mr. Rockrohr states, the schedule in this proceeding provides inadequate time to properly review Study Report #3, the Distribution System Loss Study that segregates secondary and service conductor losses pursuant to ICC Docket No. 10-0467 (Staff Ex. 11.0, 4:74-76). Similarly, it also does not allow parties to analyze Study Report #7B. Thus, ComEd Ex. 7.1 should be approved, as it reflects the Distribution System Loss Study, just approved less than a year ago by the Commission, updated for 2010 class load data.

Q. **Do you agree with Mr. Rockrohr's alternative recommendation that if Study Report #7B is not approved, the Commission should approve the Distribution System Loss Study that was approved in ComEd's last rate case (ComEd Ex. 67.2), without any update for 2010 class loads (Staff Ex. 11.0, 8:143-150)?**

A. No. ComEd Ex. 7.1 is superior to the previous study in that it is updated for 2010 class load data, which reflects the year at issue in this proceeding.

Q. **On page 6 of his direct testimony, Staff Ex. 11.0, Mr. Rockrohr compares the customer impact of energy losses between ComEd Ex. 7.1 in this proceeding, Study Report #7B, Study Report #3 and ComEd Ex. 67.2 from ICC Docket No. 10-0467. Is Mr. Rockrohr's comparison valid?**

A. No, it is not for several reasons. First, all of the studies except Study Report #7B use the transmission system loss factor (1.6%) from the 1999 Transmission System Loss Study. In Study Report #7B, the transmission losses are 2.4% of the load on the transmission system based upon the updated Transmission System Loss Study submitted as Study Report #7A. Second, ComEd Ex. 67.2 is based on 2009 class load data, and the other three studies are based on 2010 class load data. Finally, Mr. Rockrohr's chart ignores transmission losses; a valid comparison of customer impact should include both transmission and distribution losses.

Q. **How do you respond to Mr. Rockrohr's testimony that the results in the Distribution System Loss Study submitted as Study Report #3, which segregates secondary and service conductor losses in accordance with the Commission's Order in ComEd's last rate case, ICC Docket No. 10-0467, are illogical?**

A. Mr. Rockrohr's concerns are misplaced, as ComEd used a reasonable methodology to segregate the secondary and service conductor losses. However, as explained by Dr. Hemphill in his direct testimony (ComEd Ex. 1.0), this proceeding does not concern rate design, and thus the results in Study Report #3 are not to be litigated in this proceeding. Please refer to Dr. Hemphill's direct testimony regarding the future proceeding involving rate design.

Q. **Does this complete your rebuttal testimony?**

A. Yes.