

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY :  
 : No. 11-0721  
Tariffs and charges submitted pursuant to :  
Section 16-108.5 of the Public Utilities Act :  
 :

Rebuttal Testimony of  
**CHARLES S. TENORIO**  
Principal Rate Analyst,  
Retail Rates  
Commonwealth Edison Company

**TABLE OF CONTENTS**

<b>Section</b>	<b>Page</b>
I. Introduction	1
A. Witness Identification	1
B. Purpose of Rebuttal Testimony	1
C. Itemized Attachments	1
II. ComEd's Revised ECOSS	2
III. Functionalization of General and Intangible Plant	5
IV. Response to CTA/Metra	6
V. Conclusion	6

1 **I. Introduction**

2 **A. Witness Identification**

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

4 A. My name is Charles S. Tenorio. My business address is Three Lincoln Center, Oak  
5 Brook Terrace, Illinois 60181.

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 Rate Analyst, Retail Rates.

9 **Q. Are you the same Charles S. Tenorio who provided direct testimony in this  
10 proceeding?**

11 A. Yes. My direct testimony is ComEd Exhibit (“Ex.”) 10.0.

12 **B. Purpose of Rebuttal Testimony**

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

14 A. The purpose of my rebuttal testimony is to present ComEd’s revised ECOSS and to  
15 respond to the direct testimony of Staff witness Philip Rukosuev (Staff Ex. 10.0) and  
16 CTA/Metra witness James G. Bachman (CTA/Metra Joint Ex. 1.0). Along with ComEd  
17 witness Kathryn M. Houtsma (ComEd Ex. 12.0), I also respond to Mr. Rukosuev’s  
18 testimony regarding the functionalization of General and Intangible Plant.

19 **C. Itemized Attachments**

20 **Q. What exhibits are attached to your rebuttal?**

21 A. Two exhibits are attached to my rebuttal testimony:

- 22           • ComEd Ex. 19.1 presents ComEd’s revised ECOSS incorporating changes described  
23           in this rebuttal testimony.
- 24           • ComEd Ex. 19.2 shows the development of the revised Weighted Services, Meter  
25           Factor, Meter Reading, and Meter O&M allocation factors used in ComEd Ex. 19.1.  
26           There are confidential and public versions of this exhibit.

27   **II.   ComEd’s Revised ECOSS**

28   **Q.   Did ComEd revise the ECOSS attached to your direct testimony as ComEd Ex. 10.1**  
29   **TB?**

30   A.   Yes. ComEd Ex. 19.1 is a revision to ComEd Ex. 10.1 TB, which is ComEd’s ECOSS  
31       calculated in accordance with what was pending legislation (“the Trailer Bill” or “TB”) at  
32       the time ComEd Ex. 10.1 TB was submitted and which was enacted on December 30,  
33       2011 as PA 97-0646<sup>1</sup>. ComEd Ex. 19.1 incorporates the changes I describe later in this  
34       rebuttal testimony.

35   **Q.   Is the revised revenue requirement presented in the rebuttal testimony of Martin G.**  
36   **Fruehe (ComEd Ex. 13.0) reflected in the revised ECOSS?**

37   A.   Yes. In his rebuttal testimony, ComEd Ex. 13.0, Martin G. Fruehe revises downward  
38       ComEd’s overall revenue requirement. The revised revenue requirement -  
39       \$2,027,035,000 – is \$3,356,000 or 0.17% less than the revenue requirement originally  
40       presented in this proceeding. To accommodate this relatively small decrease in revenue  
41       requirement, I have adjusted the “Revenue Adjustment Factor” of Schedule “Sch.” 2a, to  
42       allocate among classes the updated revenue requirement sponsored by Mr. Fruehe. This  
43       adjustment factor is shown at line 217 of Sch. 2a in ComEd’s revised ECOSS presented

---

<sup>1</sup> Due to the enactment of the “Trailer Bill,” Public Act 097-0646, no refinements to ComEd Ex. 10.1 are submitted with this rebuttal testimony.

44 in ComEd Ex. 19.1. This is the same methodology as was used in ComEd's 2010 Rate  
45 Case (ICC Docket No. 10-0467).

46 **Q. What changes were made to the ECOSS presented in ComEd Ex. 10.1 TB to**  
47 **produce ComEd's revised ECOSS presented in ComEd Ex. 19.1?**

48 A. In addition to revising the revenue requirement, ComEd Ex. 19.1 corrects (1) certain data  
49 entry errors previously identified by both ComEd and Staff; (2) the allocation of  
50 Advanced Metering Infrastructure ("AMI") costs to the Railroad Delivery Class  
51 identified by both ComEd and CTA/Metra witness Bachman; and (3) an input error  
52 identified by ComEd related to delivery classes that have multiple standard meters.

53 **Q. Staff witness Mr. Rukosuev notes that in response to Staff data request PR 5.01**  
54 **ComEd identified a number of data entry errors in the ECOSS and committed to**  
55 **correcting the errors in rebuttal testimony. Staff Ex. 10.0, 8:164-168. Have these**  
56 **data entry errors been corrected in ComEd Ex. 19.1?**

57 A. Yes. Certain data entry errors were made in the functionalization factors for Metering  
58 Services and Distribution at lines 336-337 and 346-347 under the Total column in Sch.  
59 1b of ComEd Ex. 10.1 TB. The entries were inadvertently reversed in ComEd 10.1 TB,  
60 and are now correctly reflected in ComEd Ex. 19.1.

61 **Q. CTA/Metra witness Bachman testifies that the ECOSSs submitted in this**  
62 **proceeding allocate AMI costs to the Railroad Delivery Class. CTA/Metra Joint Ex.**  
63 **1.0, 4:64-72. Is he correct?**

64 A. Yes. In preparing its response to CTA data request 1.02, ComEd determined that non-  
65 rider recoverable AMI Pilot costs included in Operating and Maintenance ("O&M")

66 expenses and related payroll tax and pension benefit expenses were allocated to all  
67 customer classes, including, albeit a minor amount, the Railroad Delivery Class. In  
68 reviewing the 2010 revenue requirement in this proceeding it was determined that the  
69 2010 revenue requirement includes \$4,236,872 of non-rider recoverable AMI Pilot  
70 Program costs. These amounts were recorded in the following FERC accounts: account  
71 408 (\$79,173), account 586 (\$468,959), account 902 (\$3,091,793), account 920 (\$1,263),  
72 and account 926 (\$595,685). These amounts were functionalized into Metering Services  
73 in Sch. 1a of ComEd Ex. 10.1 TB at line 130 (FERC account 586), line 152 (FERC  
74 account 902), line 179 (FERC account 920), line 184 (FERC account 926), and line 261  
75 (FERC account 408). The costs in the Metering Services sub-function were then  
76 allocated by delivery class, including the Railroad Delivery Class, in Sch. 2a of ComEd  
77 Ex. 10.1 TB as more fully described in ComEd Ex. 10.0, 10:193-11:228.

78 **Q. How has ComEd addressed this allocation in ComEd Ex. 19.1?**

79 A. First, the \$4.2 million of non-rider recoverable AMI Pilot Program costs were removed in  
80 ComEd Ex. 19.1. This removal can be found in Sch. 2a of ComEd Ex. 19.1, the  
81 Allocation worksheet, on Line 339 (including the \$45 formerly allocated to the Railroad  
82 Delivery Class shown under the Railroad column heading). The allocation factor in  
83 column D on this line was also changed from METER FACTOR to METER READING,  
84 because the majority of the \$4.2 million costs (approximately \$3 million) was attributed  
85 to Meter Reading (Account 902), and the name in column C of this line was also changed  
86 to reflect that these costs are non-rider recoverable. Next, the \$4.2 million costs were re-  
87 allocated to delivery classes using the AMI Pilot allocation factor as shown at lines 209-  
88 210 of this Sch. 2a. The AMI Pilot allocation factor is shown at lines 99-101 of Sch. 2b

89 of ComEd Ex. 19.1. This factor is developed from the AMI Pilot Meter Purchase Cost  
90 shown on page 20 of ComEd Ex. 10.3.

91 **Q. Has ComEd identified any other computational errors in ComEd Ex. 10.1 TB?**

92 A. Yes. In preparing its response to CTA data request 1.02, ComEd also discovered an input  
93 error for delivery classes that have multiple standard meters. As a result of this input  
94 error, the Extra Large Load and Railroad Delivery Classes were allocated certain costs  
95 based upon the number of meters instead of the number of customers.

96 **Q. Has ComEd corrected the allocation to the Extra Large Load and Railroad Delivery**  
97 **Classes regarding multiple standard meters?**

98 A. Yes. The Weighted Services, Meter Factor, Meter Reading, and Meter O&M allocation  
99 factors developed in ComEd Ex. 19.2 reflect these changes. These allocation factors are  
100 used in Sch. 2b of ComEd Ex. 19.1. For the Railroad Delivery Class, the costs allocated  
101 were \$7,086, (ComEd Ex. 10.1 TB, Sch. 2a., line 238). With this correction, the removal  
102 of the Metering Services costs related to AMI Pilot Program described in the paragraph  
103 above, and other changes reflected in ComEd Ex. 19.1, the cost allocated to the Railroad  
104 Delivery Class is \$2,426 as shown in ComEd Ex. 19.1, Sch. 2a., line 238.

105 **III. Functionalization of General and Intangible Plant**

106 **Q. How do you respond to the direct testimony of Staff witness Mr. Rukosuev (Staff**  
107 **Ex. 10.0, 8:171-19:459) concerning the functionalization of general and intangible**  
108 **plant in ComEd's ECOSS?**

109 A. Mr. Rukosuev comments on and objects to the manner by which general and intangible  
110 plant is functionalized in ComEd's ECOSS. ComEd's ECOSS functionalizes general and

111 intangible plant in the same manner used in the development of the overall revenue  
112 requirement. Accordingly, I defer to Ms. Houtsma (ComEd Ex. 12.0) who addresses the  
113 proper functionalization of General and Intangible Plant.

114 **IV. Response to CTA/Metra**

115 **Q. CTA/Metra witness Jim Bachmann indicates that ComEd should provide a filing to**  
116 **the Commission once a quarter pertaining to the ongoing discussions planned**  
117 **between ComEd and CTA/Metra. Do you agree this is necessary?**

118 **A.** No. ComEd has discussed this issue with CTA/Metra, and has indicated that ComEd  
119 plans to continue its informal discussions as noted in the Commission's Order in Docket  
120 No. 10-0467. Four updates each year are unnecessary and would be a burden that should  
121 not be imposed as a requirement in this case. If the Commission determines there is a  
122 need for future reporting, ComEd recommends that a statement of progress resulting from  
123 such discussions be provided to both Staff and CTA/Metra once each year on January 31.

124 **V. Conclusion**

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

126 **A.** Yes.