

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

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

Rebuttal Testimony of

MICHELLE BLAISE

Vice President,
Engineering & Project Management
Commonwealth Edison Company

PUBLIC VERSION

OFFICIAL FILE
I.C.C. DOCKET NO. 11-0721
Com Ed Exhibit No. 17.0 Corrected
Witness Blaise
Date 3/8/12 Reporter CC

TABLE OF CONTENTS

Section	Page
I. Introduction	1
A. Identification of Witnesses	1
B. Purposes of Rebuttal Testimony.....	1
C. Exhibits.....	2
II. Projected Plant Additions for 2011	2
A. Response to Proposed Adjustments for Specific Projects No Longer Expected to be In Service by year end 2011	2
B. Response to Proposed Adjustment to 2011 Projected Plant Additions Based on an Historical Comparison of Budgeted and Actual Plant Additions	6
III. ComEd Study Report #5.....	11
IV. Conclusion	14

1 **I. Introduction**

2 **A. Identification of Witnesses**

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

4 A. My name is Michelle Blaise. My business address is 2 Lincoln Centre, 10th Floor,
5 Oakbrook Terrace, Illinois 60181.

6 **Q. Are you the same Michelle Blaise who has previously submitted testimony on behalf
7 of Commonwealth Edison Company (“ComEd”) in this Docket?**

8 A. Yes, my direct testimony is ComEd Exhibit (“Ex.”) 5.0.

9 **B. Purposes of Rebuttal Testimony**

10 **Q. What are the purposes and subjects of your rebuttal testimony?**

11 A. My rebuttal testimony addresses two subjects. First, I respond to certain proposed
12 adjustments to ComEd’s projected plant additions for 2011 by witnesses for Staff
13 (“Staff”) of the Illinois Commerce Commission (“Commission”). I conclude that Staff’s
14 proposed adjustments are unreasonable from an operations perspective and inconsistent
15 with known facts. Second, I respond to certain information Staff provides to the
16 Commission in testimony regarding Study Report #5, a study ComEd provided in this
17 Docket for informational purposes regarding possible solutions to eliminate ComEd’s
18 dependence on, and use of, each of the CTA-owned and Metra-owned railroad traction
19 power substations to deliver electricity to other ComEd customers. I explain that the
20 context in which Staff provides certain information regarding Study Report #5 needs to
21 be clarified. I also explain that neither ComEd nor any other party (including Staff) has

22 recommended that the Commission take any particular action regarding Study Report #5
23 in this Docket.

24 **C. Exhibits**

25 **Q. Are any exhibits attached to your testimony?**

26 **A. Yes. ComEd Exhibit (“Ex.”) 17.1 is a copy of Staff’s Response to ComEd→Staff Data**
27 **Request 5.01.**

28 **II. Projected Plant Additions for 2011**

29 **A. Response to Proposed Adjustments for Specific Projects No Longer Expected**
30 **to be In Service by year end 2011**

31 **Q. Have any parties proposed an adjustment concerning specific electric distribution**
32 **projects included in ComEd’s projected plant additions for 2011?**

33 **A. Yes. Staff witness Yassir Rashid (Rashid Dir., Staff Ex. 8.0, 2:23 - 9:185) recommended**
34 **an adjustment of approximately \$8.9 million related to specific electric distribution**
35 **projects that have been cancelled or now have expected completion dates after the end of**
36 **2011.**

37 **Q. Did Staff witness Rashid propose any adjustments in his direct testimony (Rashid**
38 **Dir., Staff Ex. 8.0) based on an assertion that the costs for specific plant addition**
39 **projects were not prudently incurred or reasonable in amount?**

40 **A. No. Mr. Rashid testified that he reviewed the specific electric distribution projects**
41 **identified in ComEd’s testimony, Schedule F-4, and data request responses. *Id.* at 4:93 –**
42 **6:130. Mr. Rashid’s analysis focused on the 32 largest plant addition projects since**
43 **ComEd’s last rate case. Mr. Rashid proposed an adjustment in the total amount of**

44 \$8,900,968 for 1 project (new business) projected for 2011 that has now been cancelled
45 by the customer and 4 projects projected for 2011 that now have projected completion
46 dates after the end of 2011. *Id.* at 2:38, 7:131-43, 8:156-72. The asserted basis for each
47 of these adjustments is that the projects will not be used and useful by the end of 2011.
48 *Id.* at 7:139-40, 8:168-9. Mr. Rashid did not propose any adjustments based on assertions
49 that the costs of specific projects were not prudently incurred or reasonable in amount.

50 **Q. How do you respond to Mr. Rashid's assertion that the costs for these five projects**
51 **should be removed from ComEd's projected plant additions for 2011 on the basis**
52 **that they fail the used and useful requirement because they have been cancelled or**
53 **will not be completed prior to the end of 2011?**

54 **A.** I disagree with Mr. Rashid's selective one-way adjustment of ComEd's total projected
55 plant additions for 2011 based on consideration of actual data for a few specific projects
56 that have now been cancelled or postponed beyond the end of 2011. Moreover, only
57 recognizing cancellations or deferrals can only lead to a less accurate projection, as Dr.
58 Hemphill discusses in detail in his testimony. In addition, that projection will be trued up
59 with actual data in the reconciliation proceeding that begins in May, 2012. Mr. Rashid's
60 proposed adjustment also fails to take into account that although some planned projects
61 may be cancelled or moved back from a scheduling perspective due to customer requests,
62 changed operating conditions, or the need to address more urgent work, such projects are
63 almost always offset or replaced by new projects that emerge and other projects in the
64 "pipeline" that have their completion schedules moved forward. In other words, by
65 comparing the March 2011 forecast with data available very late in the year on a limited

66 number of projects, Mr. Rashid wants to remove the projects that got cancelled or pushed
67 back in time while ignoring all of the new projects that were not on the March projection,
68 but that have been placed in service since then.

69 As explained in my direct testimony, ComEd's projected 2011 plant additions are
70 subject to various planning, engineering, management, operational and financial
71 processes and controls that operate to ensure the costs of such additions are prudently
72 incurred and reasonable in amount. Nevertheless, specific work items in ComEd's work
73 plan may be postponed to accommodate customer requests or more important, specific
74 types of emergent work. Such changes are common in the industry, and represent
75 prudent and reasonable management practices. They occur because specific changes
76 affecting ComEd's system have altered the investment priorities and ComEd has
77 responded by investing in the higher priority work. This is expected because ComEd is
78 dealing with a dynamic system and evolving needs. Moreover, the processes and
79 controls in place to develop and implement such changes ensure they will result in costs
80 that are prudently incurred and reasonable in amount and investments that are used and
81 useful. Accordingly, the overall amount of ComEd's projected plant additions continue
82 to reflect a reasonable projection of the overall amount of plant additions that will be
83 used and useful by the end of 2011.

84 **Q. Is there any evidence that ComEd's actual plant additions for 2011 were at or above**
85 **the level of its projected plant additions in March of 2011?**

86 **A.** Yes. Even though this is not the proceeding through which the Commission should
87 attempt to match the projection with actual results, it turns out that due to the timing of

88 this initial docket to approve ComEd's performance-based formula rate tariff and its
89 initial cost inputs, we have data available at this time on the actual plant additions for
90 2011. The results show that ComEd's actual plant additions for 2011 on a jurisdictional
91 basis were approximately \$753.6 million instead of the March forecasted amount of
92 \$684.4 million. The increased level of actual investment is principally due to higher than
93 anticipated investment in the corrective maintenance category primarily related to higher
94 than normal storm activity in ComEd's service territory during 2011. It is my
95 understanding that under the formula rate provisions of the new statute, the prudence and
96 reasonableness of the actual investment costs incurred during 2011 will be addressed in
97 the reconciliation proceeding beginning in May 2012. However, I am presenting this
98 information to demonstrate that the cancellation and postponement of certain specific
99 projects did not, as suggested by Mr. Rashid's proposed adjustment, reduce the overall
100 level of investment that ComEd placed in service for 2011. Accordingly, Mr. Rashid's
101 proposed adjustment is premature, not reasonable and should be rejected by the
102 Commission.

103 **Q. Staff witness Rashid testifies that ComEd should state in its rebuttal testimony**
104 **whether there are other projects that have been cancelled or have completion dates**
105 **after the end of 2011 that are included in ComEd's proposed rate base. Rashid Dir.,**
106 **Staff Ex. 8.0, 7:151-3, 9:180-2. How do you respond?**

107 **A.** As I testified above and as Dr. Hemphill also explains, Mr. Rashid's proposal is
108 inconsistent with the annually reconciled formula rate process requiring initial rates to
109 include costs for "projected plant additions" for the filing year followed by a subsequent

110 reconciliation to actual plant additions for that year. Comparing ComEd's March 2011
111 forecast to actual results on a project-by-project basis is inappropriate in this docket.

112 **B. Response to Proposed Adjustment to 2011 Projected Plant Additions Based**
113 **on an Historical Comparison of Budgeted and Actual Plant Additions**

114 Q. **Did any witness propose an adjustment to ComEd's projected plant additions for**
115 **2011 based on an historical comparison of budgeted and actual plant additions?**

116 A. Yes. Staff witness Richard W. Bridal II (Bridal Dir., Staff Ex. 5.0, 3:49 – 4:86) proposed
117 an adjustment of approximately \$34.6 million (before offsets for other adjustments to
118 projected plant additions by Staff witness Rashid) to ComEd's projected plant additions
119 for 2011 based on a 5-year average ratio of actual to budgeted plant additions. *Id.*, Sch.
120 5.01, p. 2, line 13.¹ Staff witness Rashid (Rashid Dir., Staff Ex. 8.0, 9:186-99) also
121 offered support for Mr. Bridal's proposed adjustment.

122 Q. **Please describe Mr. Bridal's adjustment to ComEd's projected plant additions for**
123 **2011 based on an historical comparison of budgeted and actual plant additions.**

124 A. Mr. Bridal states that his Schedule 5.01 reduces the total amount of plant additions based
125 on an historical comparison of budgeted and actual plant additions. Bridal Dir., Staff Ex.
126 5.0, 3:52-5. Mr. Bridal also states that he has removed Mr. Rashid's proposed adjustment
127 for specific projects that will not be completed in 2011 from his adjustment to ComEd's
128 total projected plant additions. *Id.* at 3:57-63. It appears that Mr. Bridal deducts Mr.
129 Rashid's adjustment from his proposed adjustment to avoid double counting these

¹ Mr. Bridal's net adjustment of \$26.641 million on page 2, line 16 of Schedule 5.01 contains a \$0.968 million computational error resulting from a formula error in his spreadsheet that did not subtract line 14 from line 13 as indicated. This error was incorporated in Staff's 2011 projected plant additions shown on Schedule 5.01, p. 2, line 5, and carried forward to page 1, line 1 of that schedule.

130 overlapping adjustments to ComEd's projected plant additions for 2011. Finally, Mr.
131 Bridal explains his adjustment as follows:

132 I am sponsoring the second part of the adjustment that reduces the level of
133 2011 projected plant additions based on the Company's past performance
134 in meeting its plant additions budget. This part of the adjustment is based
135 on ComEd's response to Staff data request ("DR") RWB 2.03 (Staff Ex.
136 5.0, Attachment A) which indicates that for the five year period covering
137 calendar years 2006 through 2010, actual plant additions have averaged
138 only 94% of budgeted plant additions. Further, through October 2011,
139 actual plant additions are tracking at only 90% of budget. Adjusting the
140 2011 projected plant additions to reflect the Company's historical
141 spending variance from budgeted plant additions provides a more realistic
142 projection of the 2011 additions to plant in service. Given these
143 observations, I propose a more reasonable level of 2011 projected plant
144 additions to be 94% of the original budget proposed by the Company.

145 *Id.* at 4:67-78.

146 **Q. Do you agree with Mr. Bridal's characterization of the information provided by**
147 **ComEd in response to Staff Data Request RWB 2.03?**

148 **A.** No, I disagree with his characterization of ComEd's Response to Staff Data Request
149 RWB 2.03. Mr. Bridal's statement that "through October 2011, actual plant additions are
150 tracking at only 90% of budget" is an inappropriate characterization of the information
151 provided in ComEd's Response to Staff Data Request RWB 2.03 and does not support
152 his proposed adjustment. ComEd's actual plant additions through October of 2011 are
153 roughly "90%"² of its projected capital additions for all of 2011. This does not indicate
154 that ComEd's actual costs are "tracking" at a level below its projection for the year. The
155 January through October time period is about 83.33% of the full projection period (10 ÷
156 12 = 83.33%) and ComEd's actual in-service plant additions through October are about

² Mr. Bridal rounds up to 90% from 87.2%.

157 87.2% of the projected total for the year ($\$608.4\text{M} \div \$697.6\text{M} = 87.2\%$). Thus, the actual
158 and projected plant additions through October 2011 are very comparable. Contrary to
159 Mr. Bridal's assertion, actual plant additions through October 2011 do not show that
160 ComEd is tracking at less than its projected plant additions for the year.

161 Q. **How do you respond to Mr. Bridal's assertion that his adjustment is needed to**
162 **"provide[] a more realistic projection of the 2011 additions to plant in service."**
163 **Bridal Dir., Staff Ex. 5.0, 4:75-6.**

164 A. He is wrong for several reasons. First, for the same reasons that I describe above relating
165 to Mr. Rashid's adjustment, to evaluate ComEd's historic budget to actual capital costs in
166 evaluating the reasonableness of its March 2011 forecast is an unnecessary exercise
167 because the forecast will be "trued-up" to the actual plant additions in the reconciliation
168 proceeding that will begin in May 2012. In fact, one pitfall of speculating on the
169 accuracy of the forecast by referring to prior periods is that it would unnecessarily cause
170 a more dramatic rate increase when the true-up is complete for the following reason. As
171 previously discussed, we know that actual 2011 investment exceeded projected 2011
172 investment, factually disproving Mr. Bridal's claim that the forecast is likely too high.³

173 Second, it is not reasonable from an operational perspective to look at historical
174 average variations in the abstract and blindly apply them to 2011 projected plant
175 additions. ComEd's models, processes and procedures used to develop its projections
176 take into account investment trends in the various work categories, which adds to their

³ Including 2011 actual results and using the period 2008 through 2011 increases the historical average ratio of actual plant additions to budgeted plant additions to 99.44%.

177 predictive capability. A simple statistical average, including past years with different
178 cost drivers, is not an adequate basis to disregard the model.

179 With respect to the particular historical years considered by Mr. Bridal, the 2009
180 time period was an aberration with a down economy and a significant decline in the level
181 of new business. While the economy has been slow to recover, it is not reasonable to
182 assume that the variance in projected to actual new business experienced in 2009 will
183 occur in 2011.

184 Q. **How does Staff witness Mr. Rashid (Rashid Dir., Staff Ex. 8.0) support Mr. Bridal's**
185 **adjustment?**

186 A. Mr. Rashid's testifies that the "twenty-two projects that [ComEd] completed prior to the
187 start of the current proceedings"⁴ had estimated completion costs (\$52,812,420) that
188 exceeded actual completion costs (\$52,109,740) by approximately 1.33%. Rashid Dir.,
189 Staff Ex. 8.0, 9:186-99. He further testifies that "[s]ince [he] believe[s] it is likely that
190 ComEd's actual completion costs for projects involving distribution plant additions that it
191 planned to complete by the end of 2011 will be less than ComEd's estimates he supports
192 Mr. Bridal's adjustment" *Id.*

193 Q. **How do you respond to Mr. Rashid's analysis?**

194 A. I disagree with Mr. Rashid's analysis for multiple reasons. First, he has misinterpreted
195 ComEd's Response to Staff Data Request ENG 1.01. In the interest of providing as
196 much information as possible to Staff, ComEd included available actual completion costs

⁴ I understand Mr. Rashid to be referring to the 22 projects showing actual completion costs in Schedule F-4 and ComEd's Response to Staff Data Request ENG 1.01_Attach 1.

197 for identified projects that were actually in service as of the date of the response.
198 However, this does not mean that all of those projects have been closed and unitized in
199 ComEd Plant Accounting system and that no further costs will be incurred or recorded.
200 For instance, for facility relocation or new business projects it is often the case that
201 ComEd needs to monitor and “protect” its facilities or otherwise maintain its presence at
202 the job site after livening facilities until the governmental entity or customer completes
203 its work. As a result, additional costs may be incurred or recorded on many of these
204 “completed” projects and eliminate or reduce the so-called “overestimate.”

205 Second, Mr. Rashid’s support of Mr. Bridal’s adjustment to projected plant
206 additions fails to take into account that actual plant additions may include new and
207 different projects from those identified in the projection. Consequently, Mr. Rashid
208 incorrectly relies on data from 30 high-cost projects to draw the conclusion that ComEd’s
209 overall projected plant additions will be overstated. Mr. Rashid has not provided any
210 analysis of the reasons for the variance in completed projects or the historical budgeted to
211 actual ratios relied upon by Mr. Bridal. In other words, it does not follow from Mr.
212 Rashid’s analysis that ComEd’s overall projected plant additions are overstated. Indeed,
213 as evidenced by the actual data available, ComEd has spent more than it estimated on
214 projected plant additions for 2011. As a result, Mr. Rashid’s analysis fails to support Mr.
215 Bridal’s adjustment.

216 Finally, Mr. Rashid makes no analysis of the variance he observed and the
217 variance ratio applied by Mr. Bridal. For the reasons stated above, no reduction to

218 ComEd's projected plant additions is appropriate. Further, Mr. Rashid's assertion of a
219 1.33% variance simply does not support Mr. Bridal's application of a 6% adjustment.

220 **III. ComEd Study Report #5**

221 **Q. Does any witness address Study Report #5 (the "RR Study")?**

222 A. Yes. Staff witness Mr. Rockrohr (Rockrohr Dir., Staff Ex. 11.0, 9:160 – 12:245)
223 provides a description of certain information contained in the RR Study.

224 **Q. Do you have any issues with the information provided by Mr. Rockrohr?**

225 A. My main concern is that the context in which Mr. Rockrohr has provided certain
226 information needs to be clarified. Without such clarification, certain information could
227 be misconstrued.

228 **Q. Please explain.**

229 A. As indicated above, the RR Study identified possible solutions to eliminate ComEd's
230 dependence on, and use of, each of the CTA-owned and Metra-owned railroad traction
231 power substations to deliver electricity to other ComEd customers. The RR Study
232 identified ***BEGIN CONF [REDACTED]

233 [REDACTED]

234 [REDACTED]

235 [REDACTED]

236 [REDACTED]

237 [REDACTED]

238 [REDACTED]

239

240

241

242

243

244

245

246

247

248

249

250

251

252

253

254

255

256

257

258

259

260

[REDACTED]

[REDACTED] END CONF*** Nor

does Mr. Rockrohr discuss the indirect costs to ComEd. The context in which Mr. Rockrohr discusses one component of direct costs but not another is difficult to understand and needs to be clarified. Such clarification was provided in a Staff data request response.

As explained in more detail in Staff's Response to ComEd-Staff Data Request 5.01 attached to my testimony as ComEd Ex. 17.1, Mr. Rockrohr views "dependence" on railroad facilities as separate and distinct from "use" of railroad facilities. Thus, Mr. Rockrohr believes ComEd could "use" railroad facilities to serve other retail customers without necessarily "depending" on those facilities to serve those other customers. The costs Mr. Rockrohr focuses on would potentially eliminate ComEd's "dependence" on railroad facilities but would not eliminate ComEd's "use" of railroad facilities. It is important to understand that this is the context of Mr. Rockrohr's testimony regarding costs. Under Mr. Rockrohr's distinction, the costs to eliminate ComEd's dependence on the railroad's facilities would potentially be less than the costs to eliminate its dependence on and use of those facilities.

Q. Do you have any other response to Mr. Rockrohr's testimony regarding the RR Study?

A. Yes. Mr. Rockrohr testifies that ***BEGIN CONF [REDACTED]

[REDACTED]

[REDACTED] END CONF*** it is his "understanding that CTA and

261 Metra would not need to modify their facilities, and *** BEGIN CONF [REDACTED]
262 [REDACTED]
263 [REDACTED]” END CONF*** Mr. Rockrohr’s “understanding” with respect to
264 ComEd’s facilities may be correct, but we cannot confirm same until we conduct
265 additional analysis. While not making a specific proposal, Mr. Rockrohr’s testimony
266 appears to suggest that Staff is interested in eliminating ComEd’s “dependence” on
267 railroad facilities without eliminating its “use” of those facilities. ComEd intends to
268 discuss that possibility with Staff and the railroads outside of this Docket.

269 Q. **Did Mr. Rockrohr make any recommendations based on the information he**
270 **provided in his testimony?**

271 A. No. Mr. Rockrohr only states the following:

272 It is my understanding that ComEd submitted Study Report #5 for
273 informational purposes, and that the Commission need not make any
274 determination regarding the information in Study Report #5 in this
275 proceeding. Also, while I am not an attorney, given the passage of PA 97-
276 0616 and the adoption of Section 16-108.5 of the Public Utilities Act [220
277 ILCS 5/16-108.5], it is unclear to me when the Commission will need to
278 consider the information included in Study Report #5 or when it should
279 revisit the annual subsidy that the Railroad Class receives from other
280 customer classes.

281 Rockrohr Dir., Staff Ex. 11.0, 12:238-45. Mr. Rockrohr is correct that ComEd submitted
282 the RR Study for informational purposes and is neither asking nor recommending that the
283 Commission take any action on the RR Study in this Docket. Indeed, no party has asked
284 or recommended that any action be taken on the RR Study in this Docket, and ComEd is
285 not aware of how the RR Study is relevant to any issue being considered in this Docket.
286 As such, Mr. Rockrohr’s testimony and my clarifying remarks provide information to the

287 Commission, but no action has been requested or needs to be taken on the RR Study in
288 this Docket.

289 **IV. Conclusion**

290 **Q. Does this complete your direct testimony?**

291 **A. Yes.**

REDACTED
Response to ComEd's
Fifth Set of Data Requests to Staff
Docket No. 11-0721
Response of Staff Witness Rockrohr

ICC Person Responsible: Greg Rockrohr
Title: Senior Electrical Engineer, Energy Division
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

Request 5.01

Mr. Rockrohr makes the following statement in his direct testimony (Staff Ex. 11.0, 11:207-13):

BEGIN CONF *** [REDACTED] *** END CONF to supply other customers, then it is my understanding that CTA and Metra would not need to modify their facilities, and BEGIN CONF *** [REDACTED] *** END CONF

- a) Please explain in detail what Mr. Rockrohr means by this statement, including the meaning of the phrase BEGIN CONF *** [REDACTED] ***END CONF to supply other customers."
- b) To the extent not addressed in response to part (a), is it Mr. Rockrohr's opinion that BEGIN CONF *** [REDACTED] *** END CONF, ComEd would not be considered to "depend" or "rely" BEGIN CONF *** [REDACTED] *** END CONF

Response

- a) ComEd's Study Report #5 describes work that ComEd asserts, if performed, would eliminate ComEd's dependence on, and use of, BEGIN CONF *** [REDACTED] ***END CONF to supply its other customers. In Mr. Rockrohr's view, ComEd's "dependence on" the BEGIN CONF *** [REDACTED] ***END CONF does not have the same meaning as ComEd's "use of" the BEGIN CONF *** [REDACTED] *** END CONF. In particular, if ComEd could adequately supply all of its other customers regardless of whether it used the BEGIN CONF *** [REDACTED] ***

REDACTED
Response to ComEd's
Fifth Set of Data Requests to Staff
Docket No. 11-0721
Response of Staff Witness Rockrohr

ICC Person Responsible: Greg Rockrohr
Title: Senior Electrical Engineer, Energy Division
Business Address: Illinois Commerce Commission
527 East Capitol Avenue
Springfield, IL 62701

***END CONF then ComEd would not depend upon those
BEGIN CONF ***

Mr. Rockrohr understands ComEd's Study Report #5 to indicate that distribution system reinforcements would be required in order for ComEd to become capable of supplying its other customers without using railroad equipment by BEGIN CONF***
CONF. Mr. Rockrohr understands that completing the reinforcements contemplated in Study Report #5 would eliminate ComEd's dependence on the BEGIN CONF ***
practice, ComEd BEGIN CONF***
***END CONF

Finally, Mr. Rockrohr understands ComEd's Study Report #5 to indicate that ComEd determined that a number of BEGIN CONF***
would be necessary at ComEd's substations and the BEGIN CONF***
practice of BEGIN CONF***
END CONF In his direct testimony, Mr. Rockrohr neither agreed, nor disagreed with ComEd's conclusions about the need for BEGIN CONF
CONF. Mr. Rockrohr's testimony that ComEd references in this data request instead simply points out that the BEGIN CONF***
Report #5 would not be necessary if ComEd were to continue its current practice of BEGIN CONF***
END CONF. Mr. Rockrohr's conclusion is based upon the premise that existing protection schemes installed on ComEd's distribution circuits that supply the BEGIN CONF
adequate.

b) Yes, see response to (a).