

Canestrini Affidavit

MARISA CANESTRINI, being first duly sworn on oath, states that:

1. I am a Billing Clerk in the ComEd's Billing Department and have been employed in this position for 19 years, having a total of 41 years with the company.
2. Among other responsibilities, I bill an account if there is a problem with the system not billing on its own, or I will correct accounts that have billed wrong. Once a correction has been made with the billing system, it should then bill correctly on its own.
3. In the course of my regular work, I reviewed a constant discrepancy report on Account No. 29310-08045 (LAZ Parking), associated with Meter No. 141362866.
4. A "constant report" is computer-generated once a week by CIMS (Customer Management Information System). It identifies if there are discrepancies with the equipment and the type of meter on any account. Some meters require additional equipment depending on the size of the meter. In this case, Meter No. 141362866 is a size 26 meter which requires current transformers on it. The constant on the meter was at 1, however, which was wrong for this type of meter and this is why the account appeared on the constant report.
5. To confirm this situation, I requested verification by ComEd's Field and Meter department.
6. The technician's investigation was to verify the # of the meter, and the size, type of the equipment (current transformer) associated with that particular meter. The technician's report of this data was to be entered into CIMS a program that I access in the course of my duties.
7. Please see attached and marked with Bates CCLP 0000103 and 104, a "constant discrepancy report" with columns that indicate [from left to right]: the Account # (2931008045); Meter # (141362866); Meter type and size (D3LS6R - 026); KH (1.80); CPR (12.000); Calculated "Should Be" Constant (first line: 0.18; second line: 600); and Constant on record in CIMS (first line: 0.0003-Recorder; second line 1.0000-recorder). There are additional columns below that list CT equipment (006975984,989 and 993 and the AMPS (3000) on each of the CT's.
8. Having verification of the CT data, I proceeded to calculate the correct constant for the subject meter. (See the attachment to my affidavit marked with Bates number CCLP 0000014 and given to LAZ Parking in discovery, for the job-aid I utilized to calculate the constant for the Meter, i.e., "Calculating Meter Constants for Recording Meters" ).
9. To make things clear here, a recorder meter is driven by the Kw constant, not the KWH constant. Yes, the KWH constant on Meter No. 141362866 is 600 but the kw constant is .18. A recorder meter, measures usage by pulses not by readings (cum meter). The formula used to come up with the kw constant is reflected on ComEd-Canestrini Ex. B as follows:

Amp Size

5 = Watt-hour Constant

$$\frac{(2)(\text{Watt-hour constant})(\text{kh factor})}{1000 \times \text{CPR}} = \text{Demand Constant}$$

Using this formula, then, the demand factor is computed as follows:

$$[(2)(600)(1.8)] / [1000 \times 12] = 2160 / 12000 = .18$$

Constant:  $3000/5 = 600$  (for every 3000 amps that flow to the customer, only 5 amps flow to and register on the meter)

$600 \times 2$  (always multiplied by 2) = 1200

$1200 \times 1.8$  (kh factor) = 2160

$2160/12,000$  (cpr) = .18

$3000/5 = 600 \times 2 = 1200 \times 1.8 = 2160/12000 = .18$ .

So, the constant is  $600/.18$ . 600 for the kwh and .18 for the demand.

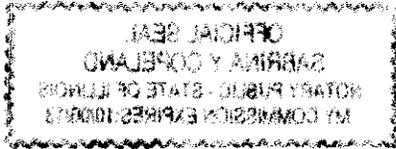
9. Due to the incorrect constant of "1" instead of the corrected constant that I calculated on the basis of the verified data, my billing correction of LAZ began on May 18, 2010. It should be known that before I started making the corrections, I checked and found two other accounts for LAZ that had the same type of high usage. These were acct # 43551-65001 for 201 E Randolph, Bldg 114 and acct # 37831-51112 for 350 E Monroe St, Bldg 113. After noting both the high usage on these accounts and the field verification, I felt comfortable making the corrections. I cancelled the incorrectly-issued bills for the period of June 3, 2008 through May 3, 2010.
10. Further, I re-billed for this same period, i.e., June 3, 2008 through May 5, 2010.
11. While I observed that LAZ had been billed incorrectly for a longer period, i.e., beginning December 14, 2007 (when there was a meter exchange), my re-bill of LAZ was restricted to 2 years due to Section 280.100 of the Commission's rules.
12. Attached to my affidavit here is a business record provided to LAZ Parking in discovery with Bates number CCLP 0000013. It reflects, in my handwritten notations, that the total amount that LAZ Parking owed ComEd on the re-bill and for the period 6/3/08-5/5/10 was \$ 225,484.52. It also indicates that the original billed charges for this period (and credited) were \$44,541.37. The original billed kwh usage was 15,180 KWH hours and the rebilled KWH usage was 9,135,359 KWH hrs. The original billed kw usage was 21.25 and the rebilled kw usage was 14027.94.
13. This same business record indicates the date of the meter change on December 14, 2007. Further, the data thereon shows the significant difference in usage billed both prior and subsequent to the meter change. This demonstrates the effect of the incorrect meter constant in billing after December 14, 2007.

*Marisa Canestrini*  
Marisa Canestrini

Subscribed and Sworn to before me  
this 7 day of June, 2013.

*Sabrina Y. Copeland*  
Notary Public





Report ID: CURS036C  
ComEd Transaction Report  
Date: 2010-04-23  
Customer Information and Marketing System  
METER CONSTANT DISCREPANCY REPORT

Account Number-Meter Number-Model Type-Meter Size-Kh	-CPR	-Calculated Constant-CONSTANT IN CIMS-	Meter Type	-	Readi
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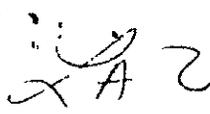
**CCLP 0000103**  
**CONFIDENTIAL**

B4

CT	-999999999	-	3000.00 AMPS					
2931008045	-141362866	-D3LS6R	-026	-	1.80- 12.000-	0.1800-	0.0003-Recorder	-Probe Ene Me
ter	-Active	-03						
2931008045	-141362866	-D3LS6R	-026	-	1.80- 12.000-	600.0000-	1.0000-Recorder	-Electronic M
tr Dial Kwh	-Active	-03						
CT	-006975984	-	3000.00 AMPS					
CT	-006975989	-	3000.00 AMPS					
CT	-006975993	-	3000.00 AMPS					

**Calculating Meter Constants For Recording Meters**

<b>(2) (kH Factor)</b>	
$1000 \times \text{CPR}$	= Demand Constant
<b>Amp Size</b>	
5	= Watt-hour Constant
<b>(2)(Watt-hour constant)(kH factor)</b>	
$1000 \times \text{CPR}$	= Demand Constant
<b>Amp Size</b>	
5	= Watt-hour Constant
<b>Volt Size</b>	
120	= Watt-hour Constant
<b>(2)(CT Constant) (PT Constant) (kH Factor)</b>	
$1000 \times \text{CPR}$	= Demand Constant


 XAZ PARKING 29310-0804

[Select Meter Reading History for Meter 141362866]

From	To	Source	GS Tot	GS Or	Off Pk Kw	On Pk Kw	Maximum	Status
4/6/2010	5/3/2010	Regular Comp	537	1.13	1.14	1.13	1.14	Billed
3/5/2010	4/6/2010	Regular Comp	626	0.76	0.86	0.76	0.86	Billed
3/5/2010	4/6/2010	Probable Worl	628	1.16	1.15	1.16	1.16	Posted
2/5/2010	3/5/2010	Regular Comp	518	0.78	0.77	0.78	0.77	Billed
1/7/2010	2/5/2010	Regular Comp	542	0.78	0.78	0.78	0.78	Billed
12/3/2009	1/7/2010	Regular Comp	660	0.78	0.79	0.78	0.78	Billed
11/3/2009	12/3/2009	Regular Comp	630	0.78	0.78	0.78	0.78	Billed
10/5/2009	11/3/2009	Regular Comp	546	0.78	0.78	0.78	0.78	Billed
9/3/2009	10/5/2009	Regular Comp	748	0.77	0.78	0.77	0.78	Billed
8/4/2009	9/3/2009	Regular Comp	666	0.8	0.79	0.8	0.79	Billed
7/7/2009	8/4/2009	Regular Comp	775	1.17	1.27	1.17	1.27	Billed
6/5/2009	7/7/2009	Regular Comp	758	0.94	0.94	0.94	0.94	Billed
5/6/2009	6/5/2009	Estimate Reac	632	1.02	1.02	1.02	1.02	Billed
5/6/2009	6/5/2009	Regular Comp	0	0	0	0	0	Do Not Bill
4/7/2009	5/13/2009	Probable Worl	805	1.02	1.02	1.02	1.02	Posted
4/7/2009	5/6/2009	Regular Comp	664	0.9	0.9	0.9	0.9	Billed
4/7/2009	5/6/2009	Regular Comp	0	0	0	0	0	Do Not Bill
3/9/2009	4/7/2009	Regular Comp	668	1.03	0.97	1.03	0.97	Billed
2/6/2009	3/9/2009	Regular Comp	726	1.06	1.05	1.06	1.05	Billed
1/7/2009	2/6/2009	Regular Comp	714	1.07	1.08	1.07	1.07	Billed
12/4/2008	1/7/2009	Regular Comp	806	1.08	1.09	1.08	1.09	Billed
11/3/2008	12/4/2008	Regular Comp	800	1.25	1.25	1.25	1.25	Billed
10/2/2008	11/3/2008	Regular Comp	749	1.25	0.97	1.25	0.97	Billed
9/4/2008	10/2/2008	Regular Comp	568	0.75	0.76	0.75	0.76	Billed
8/5/2008	9/4/2008	Regular Comp	590	0.85	0.86	0.85	0.86	Billed
7/2/2008	8/5/2008	Regular Comp	682	0.82	0.8	0.82	0.8	Billed
6/3/2008	7/2/2008	Regular Comp	575	0.84	0.76	0.84	0.84	Billed
5/2/2008	6/10/2008	Probable Worl	752	1.25	1.25	1.25	1.25	Posted
5/2/2008	6/4/2008	Regular Comp	0	0	0	0	0	Do Not Bill
5/2/2008	6/3/2008	Regular Comp	607	0.76	0.76	0.76	0.76	Billed
4/3/2008	5/2/2008	Regular Comp	573	0.8	0.81	0.8	0.81	Billed
3/6/2008	4/3/2008	Regular Comp	620	1	1	1	1	Billed
2/6/2008	3/6/2008	Regular Comp	723	1.08	1.08	1.08	1.08	Billed
1/7/2008	2/6/2008	Estimate Reac	380	0.58	0.58	0.58	0.58	Billed
1/7/2008	2/6/2008	Regular Comp	0	0	0	0	0	Do Not Bill
12/14/2007	1/7/2008	Regular Comp	666	274	387.36	274.32	274.32	Billed
	12/14/2007	Change Meter						
12/3/2007	12/14/2007	Change Meter	83075	389	392.04	389.16	392.04	Billed
12/3/2007	12/14/2007	Probable Worl	83075	389	392.04	389.16	392.04	Posted
	12/14/2007	Work Reading						Posted
10/31/2007	12/3/2007	Regular Comp	243384	384	383.76	384.12	383.76	Billed
10/1/2007	10/31/2007	Regular Comp	241225	400	402.48	399.6	399.6	Billed
9/4/2007	10/1/2007	Regular Comp	218747	401	407.88	400.68	407.88	Billed
8/2/2007	9/4/2007	Regular Comp	256939	375	381.24	375.12	381.24	Billed
7/3/2007	8/2/2007	Regular Comp	234791	377	382.68	376.92	382.68	Billed
6/5/2007	7/3/2007	Regular Comp	221891	386	381.96	386.28	386.28	Billed

Accrued = 9135,359 kW  
 140 x 7.94 kW  
 225,484.52

(44,541.37

21.25  
 15,180