

STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

COMMONWEALTH EDISON COMPANY :
 : No. 13-____
Tariff filing to present the Illinois Commerce :
Commission with an opportunity to consider :
revenue neutral tariff changes related to rate :
design authorized by subsection 16-108.5(e) :
of the Public Utilities Act

Direct Testimony of
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1 **I. INTRODUCTION**

2 **A. Witness Identification**

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

4 A. My name is Charles S. Tenorio. My business address is 440 S. LaSalle, Suite 3300,
5 Chicago, Illinois 60605.

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

7 A. I am employed by Commonwealth Edison Company (“ComEd”) as Manager of
8 Regulatory Strategies and Solutions.

9 **B. Summary of Direct Testimony**

10 **Q. What are the purposes of your direct testimony?**

11 A. There are five primary purposes of my direct testimony. First, I present a redline version
12 of a single tariff sheet, 2nd Revised Sheet No. 430 from Rate DSPP – Delivery Service
13 Pricing and Performance (“Rate DSPP”). ComEd filed this tariff sheet with the Illinois
14 Commerce Commission (“ICC” or “Commission”) on April 30, 2013, *with no changes*,
15 in accordance with the provisions of subsection 16-108.5(e) of the Public Utilities Act
16 (“PUA” or “Act”). This filing provides the Commission with an opportunity to consider
17 revenue requirement neutral tariff changes related to ComEd’s delivery service cost
18 allocation and rate design in a rate design investigation (“RDI”) proceeding.

19 Second, I present the populated rate design model that determines delivery service
20 charges with cost inputs from the embedded cost of service study (“ECOSS”) identified
21 as the RDI ECOSS by Mr. Bradley L. Bjerning in his direct testimony, ComEd Exhibit
22 (“Ex.”) 3.0. I refer to this populated rate design model as the RDI Rate Design and its
23 associated delivery service charges as the RDI Delivery Service Charges.

24 Third, I present illustrative rate design models populated with cost data input
25 corresponding to each illustrative ECOSS addressed in Mr. Bjerning's direct testimony,
26 ComEd Ex. 3.0.

27 Fourth, I present ComEd's proposed updates to a number of other miscellaneous
28 charges and adjustments that are listed in various tariffs in its Schedule of Rates. These
29 other miscellaneous charges and adjustments were not updated in Docket No. 11-0721
30 ("2011 FR Case") or Docket No. 12-0321 ("2012 FR Update Case"). I also present
31 proposed tariff revisions that serve to have certain values listed in informational sheets
32 rather than in tariff sheets. Further, I present ComEd's proposal to offer light emitting
33 diode ("LED") lighting units to the Fixture-Included Lighting ("FIL") Delivery Class.

34 Finally, I address the manner in which ComEd responded to a number of previous
35 Commission directives.

36 **Q. What are your conclusions in this direct testimony?**

37 A. First, the RDI Rate Design is in accord with the provisions of the Determination of
38 Delivery Service Charges section on Sheet No. 430 of Rate DSPP and is consistent with
39 the Order in Docket No. 10-0467 ("2010 Rate Case"), and as further directed in the 2011
40 FR Case Order. While, as a matter of general principle, it is ComEd's position that cost
41 recovery should reflect cost causation, ComEd takes no position at this time as to the
42 relative merits of the RDI Rate Design in relation to cost allocation in the RDI ECOSS.
43 Moreover, in order to provide information to help the Commission evaluate the
44 implications of certain changes related to cost allocations between groups of customers,
45 as well as changes in rate design, ComEd is providing what I refer to as illustrative rate
46 designs based upon the illustrative ECOSSs addressed in ComEd Ex. 3.0. ComEd takes

47 no position at this time as to the relative merits of any of the illustrative rate designs in
48 relation to cost allocation in any of the associated ECOSs.

49 Second, ComEd's updates to a number of other miscellaneous charges and
50 adjustments listed in its Schedule of Rates are being proposed in order to provide for the
51 recovery of applicable costs.

52 Third, ComEd's proposal to offer LED lighting units to customers in the FIL
53 Delivery Class furthers its efforts to provide customers with energy efficient options
54 pertaining to their electric service.

55 Finally, based upon the information provided in its direct testimony, it is
56 ComEd's position that it has responded appropriately and in good faith to Commission
57 directives presented in the 2010 Rate Case Order, the 2011 FR Case Order, the Order in
58 Docket No. 11-0498, and the 2012 FR Update Case Order.

59 **C. Background and Qualifications**

60 **Q. What are your duties and responsibilities at ComEd?**

61 A. I am responsible for managing the activities of ComEd's Regulatory Strategies and
62 Solutions ("RSS") group. This group is responsible for the analysis and development of
63 strategic policy for ComEd's distribution business and for the development of the cost of
64 service study. These responsibilities give me a central role in the development of many
65 of ComEd's new tariffs, as well as the development of new regulated proposals.

66 **Q. Prior to your current position, what other positions did you hold at ComEd?**

67 A. Prior to my role as Manager, RSS, I was a Principal Rate Analyst in the Retail Rates
68 group, during which I provided retail tariff expertise and support in various regulatory

69 proceedings, including the review and preparation of proposed new tariffs and tariff
70 revisions, calculation of bill impacts and comparisons, and administrative oversight for
71 the application and implementation of ComEd tariffs. Before that, I worked in the RSS
72 group at ComEd, where my duties included working on a wide range of projects and
73 various cases with the ICC and other parties. Before moving to RSS, I held various roles
74 in Customer Operations including the manager of Project and Vendor Management and
75 the manager of Billing. As the manager of Project and Vendor Management, I led a team
76 responsible for project management for an assortment of projects for the Vice President
77 of Customer Financial Operations as well as managing vendors responsible for printing
78 and mailing bills, providing electronic bills online, and providing various payment
79 services across both ComEd and ComEd's sister utility, PECO. As the manager of
80 Billing, I was responsible for the accurate calculation of over 42 million bills annually
81 through managing a department of six supervisors and over 100 billing clerks. Before
82 moving to Billing, I was a manager of Electric Supplier Services Department ("ESSD")
83 responsible for ComEd's relationship with Retail Electric Suppliers. Finally, I held
84 several positions as an account manager in ESSD and Large Customer Solutions. I have
85 been employed by ComEd or its parent company, Exelon Corporation, since 1992.

86 **Q. Have you previously testified before the Commission?**

87 **A.** Yes. I presented testimony in the 2011 FR Case, the 2012 FR Update Case, and the case
88 on remand in Docket No. 07-0566.

89 **Q. What is your educational background?**

90 A. I graduated from Purdue University in Lafayette, Indiana, with a Bachelors of Science in
91 Electrical Engineering with a concentration in Power. I received my Masters of Business
92 Administration from DePaul University, Kellstadt Graduate School of Business in
93 Chicago, Illinois, with a concentration in Finance.

94 **D. Glossary of Terms**

95 **Q. Do you utilize specific terms and acronyms in this direct testimony?**

96 A. Yes. An alphabetical listing of descriptions and definitions of various terms and
97 acronyms used in this direct testimony is provided in ComEd Ex. 2.01, Glossary of
98 Terms.

99 **E. Attachments to Direct Testimony**

100 **Q. What exhibits are attached to your direct testimony?**

101 A. In addition to the previously mentioned Glossary of Terms presented in ComEd Ex. 2.01,
102 the following exhibits are attached to my direct testimony:

- 103 • ComEd Ex. 2.02 is a redline copy of 2nd Revised Sheet No. 430 from Rate DSPP
104 filed with the ICC without change on April 30, 2013;
- 105 • ComEd Ex. 2.03 is the populated rate design model used to determine the delivery
106 service charges recently submitted with the petition filed to initiate ComEd's
107 second annual formula rate update proceeding;
- 108 • ComEd Ex. 2.04 is the RDI Rate Design;
- 109 • ComEd Ex. 2.05 presents the spreadsheet used to develop the single bill option
110 credit that reflects the manner in which costs are allocated in the RDI ECOSS;

- 111 • ComEd Exs. 2.06 through 2.19 are a series of illustrative rate designs, which are
 112 based upon the RDI ECOSS or one of the illustrative ECOSSs presented in
 113 ComEd Ex. 3.0 by Mr. Bjerning and are summarized in Table CST-D1:
 114 Illustrative Rate Designs;

Table CST-D1: Illustrative Rate Designs		
Exhibit	Cost Inputs	Revenue Responsibility
ComEd Ex. 2.06	RDI ECOSS	Matches ECOSS Cost Allocation
ComEd Ex. 2.07	RDI ECOSS	Movement Toward ECOSS Cost Allocation
ComEd Ex. 2.08	ComEd Ex. 3.10	Current Revenue Responsibility Levels
ComEd Ex. 2.09	ComEd Ex. 3.10	Matches ECOSS Cost Allocation
ComEd Ex. 2.10	ComEd Ex. 3.12	Current Revenue Responsibility Levels
ComEd Ex. 2.11	ComEd Ex. 3.12	Matches ECOSS Cost Allocation
ComEd Ex. 2.12	ComEd Ex. 3.14	Current Revenue Responsibility Levels
ComEd Ex. 2.13	ComEd Ex. 3.14	Matches ECOSS Cost Allocation
ComEd Ex. 2.14	ComEd Ex. 3.16	Current Revenue Responsibility Levels
ComEd Ex. 2.15	ComEd Ex. 3.16	Matches ECOSS Cost Allocation
ComEd Ex. 2.16	ComEd Ex. 3.17	Current Revenue Responsibility Levels
ComEd Ex. 2.17	ComEd Ex. 3.17	Matches ECOSS Cost Allocation
ComEd Ex. 2.18	ComEd Ex. 3.18	Current Revenue Responsibility Levels
ComEd Ex. 2.19	ComEd Ex. 3.18	Matches ECOSS Cost Allocation

- 115
- 116 • ComEd Exs. 2.20 through 2.30 are computations of the proposed other
 117 miscellaneous charges and adjustments summarized in Table CST-D2: Proposed
 118 Other Miscellaneous Charges and Adjustments;

Table CST-D2: Proposed Other Miscellaneous Charges and Adjustments		
Exhibit	Charge/Adjustment	Tariff
ComEd Ex. 2.20	Standard Meter Allowances	Rider ML
ComEd Ex. 2.21	Monthly Rental Charges	Rider ML
ComEd Ex. 2.22	Nonstandard Direct Access Service Request Fee	Rate RDS
ComEd Ex. 2.23	Nonstandard Switching Fee	Rate RDS
ComEd Ex. 2.24	Off-Cycle Termination Fee	Rate BESH
ComEd Ex. 2.25	Charges Applicable to Metering Service Provider	Rate MSPS
ComEd Ex. 2.26	Cable Television Power Supply Test Fee	General Terms and Conditions ("GTC")
ComEd Ex. 2.27	Duplicate Information Fee	GTC
ComEd Ex. 2.28	Interval Data Fee	GTC
ComEd Ex. 2.29	Invalid Payment Fee	GTC
ComEd Ex. 2.30	Reconnection Fee	GTC

119

120 • ComEd Ex. 2.31 presents, in redline format, the other proposed tariff revisions
121 filed by ComEd on April 30, 2013;

122 • ComEd Ex. 2.32 presents illustrative informational sheets that would be filed to
123 correspond to certain proposed tariff revisions;

124 • ComEd Ex. 2.33 is a copy of the study, *Residential Electricity Usage and Bill*
125 *Impacts of the Straight Fixed Variable Rate Design* ("Residential Usage Study");

126 • ComEd Ex. 2.34 shows the form of public notice ComEd is providing for this
127 filing, which is similar to the notice that is required in a general rate case filing
128 pursuant to Title 83 Illinois Administrative Code Part 255.20.

129 **II. DELIVERY SERVICE RATE DESIGN**

130 **Q. How do you identify ComEd's delivery classes?**

131 A. ComEd’s customers are part of either the residential sector, nonresidential sector, or
132 lighting sector. Each sector contains various delivery classes of customers. Delivery
133 classes are groups of customers that are categorized on the basis of certain common
134 characteristics or attributes. A specific discussion of the distinctions between the
135 customer classes is found in the General Terms and Conditions of ComEd’s Schedule of
136 Rates. There are four residential delivery classes in the residential sector:

- 137 • Single Family Without Electric Space Heat (“SFNH”) Delivery Class
- 138 • Multi Family Without Electric Space Heat (“MFNH”) Delivery Class
- 139 • Single Family With Electric Space Heat (“SFH”) Delivery Class
- 140 • Multi Family With Electric Space Heat (“MFH”) Delivery Class.

141 Meanwhile, the nonresidential sector has eight delivery classes:

- 142 • Watt-Hour (“WH”) Delivery Class – No or only watt-hour metering
143 equipment and usage typically less than 2,000 kilowatt-hours (“kWh”) per
144 month
- 145 • Small Load (“SL”) Delivery Class – 0 up to 100 kilowatts (“kW”)
- 146 • Medium Load (“ML”) Delivery Class – Over 100 kW up to 400 kW
- 147 • Large Load (“LL”) Delivery Class – Over 400 kW up to 1,000 kW
- 148 • Very Large Load (“VLL”) Delivery Class – Over 1,000 kW up to 10,000
149 kW

- 150 • Extra Large Load (“ELL”) Delivery Class – Over 10,000 kW
- 151 • High Voltage (“HV”) Delivery Class – Electricity enters customer
152 premises at or above 69 kilovolts (“kV”)
- 153 • Railroad (“RR”) Delivery Class - Customers use electricity for traction
154 power in the operation of trains.

155 Finally, the lighting sector, which includes customers using electricity to operate lighting
156 systems, such as public street lights, traffic signals, or outdoor security lighting, is
157 comprised of three delivery classes:

- 158 • FIL Delivery Class – Electricity used only during hours that occur between
159 dusk and dawn for lighting fixtures provided by ComEd
- 160 • Dusk to Dawn Lighting (“DDL”) Delivery Class - Electricity used only during
161 hours that occur between dusk and dawn for lighting fixtures provided by
162 customers
- 163 • General Lighting (“GL”) Delivery Class - Electricity use not limited to
164 between dusk and dawn for lighting fixtures provided by customers.

165 Q. **Is ComEd proposing any changes to the current set of delivery classes?**

166 A. No. ComEd is not proposing any change to the number or characteristics of the current
167 set of delivery classes in this proceeding. All the rate designs presented in this direct
168 testimony incorporate the current set of delivery classes in the same manner.

169 Q. **What is the purpose of the rate design model?**

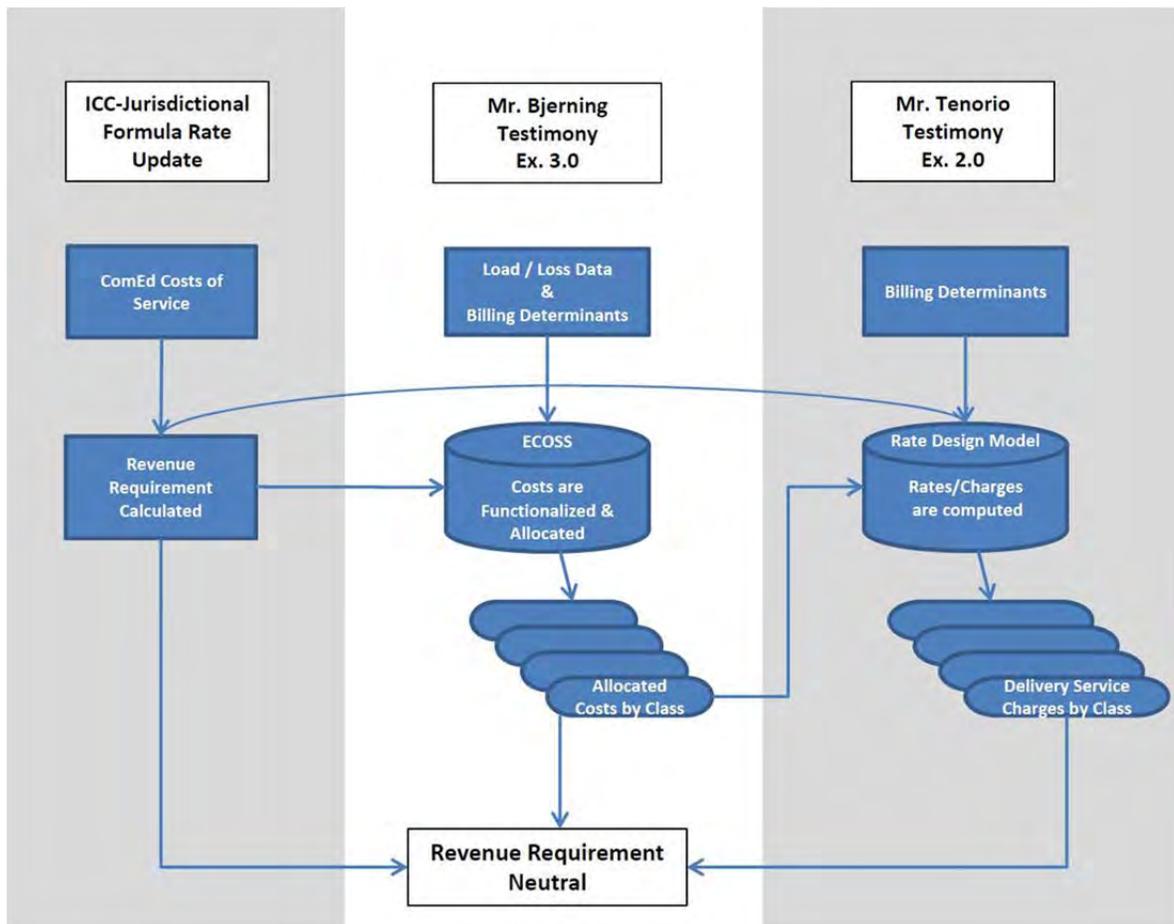
170 A. The rate design model is a spreadsheet work book used to determine the delivery service
171 charges that are designed to recover the Illinois jurisdictional net delivery service revenue
172 requirement determined pursuant to the provisions of Rate DSPP (“Rate Year Net
173 Revenue Requirement”). The rate design model also shows how much of the Rate Year
174 Net Revenue Requirement is expected to be recovered from each class of delivery
175 customers (“delivery class”) through the application of the delivery service charges.

176 **Q. How is a delivery class’ share of the Rate Year Net Revenue Requirement reflected**
177 **in the rate design model?**

178 A. For purposes of the rate design model, the expected recovery amount associated with a
179 delivery class is called the delivery class’ “revenue responsibility”. The revenue
180 responsibility for a delivery class is shown in two ways in the rate design model. It is
181 shown as a dollar amount, and the sum of those amounts for all the delivery classes
182 equals the Rate Year Net Revenue Requirement. It is also shown as a percentage of the
183 costs allocated to the delivery class in the associated ECOSS.

184 As part of its petition filing to initiate its second annual formula rate update
185 proceeding, ComEd recently submitted to the ICC the populated rate design model that
186 determines delivery service charges and shows delivery class revenue responsibilities
187 based upon the 2014 Rate Year Net Revenue Requirement of \$2,334,330,000 presented
188 by Mr. Martin G. Fruehe in direct testimony submitted with that petition. I refer to that
189 populated rate design model as the 2013 Formula Rate Update (“FRU”) Rate Design and
190 its associated delivery service charges as the 2013 FRU Delivery Service Charges. The
191 2013 FRU Rate Design is presented in ComEd Ex. 2.03. Cost inputs used in the 2013

192 FRU Rate Design are from the ECOSS presented by Mr. Bjerning in direct testimony
 193 submitted with that petition, which is also presented in ComEd Ex. 3.04 in this
 194 proceeding (“2013 FRU ECOSS”). The relationship between rate design (development
 195 of delivery service charges), cost allocation (the ECOSS), and the Rate Year Net
 196 Revenue Requirement is shown as follows.



197

198 **Q. Is ComEd proposing any changes to the 2013 FRU Rate Design?**

199 **A.** No. ComEd is not proposing any changes to the equations or methodologies in the 2013
 200 FRU Rate Design at this time. As shown in redline in ComEd Ex. 2.02, no revisions are
 201 proposed for Sheet No. 430 from Rate DSPP. ComEd filed that sheet from Rate DSPP

202 on April 30, 2013, without change. This filing was made in order to present the
203 Commission with an opportunity to consider revenue requirement neutral tariff changes
204 related to ComEd's delivery service cost allocation and rate design.

205 **Q. Then why are the RDI Delivery Service Charges different from the 2013 FRU**
206 **Delivery Service Charges?**

207 A. Inputs to the rate design model include embedded cost data, as well as data for the FIL
208 Delivery Class. The RDI Rate Design presented in ComEd Ex. 2.04 includes (a) cost
209 inputs from the RDI ECOSS addressed in ComEd Ex. 3.0 by Mr. Bjerning and (b) FIL
210 data inputs that reflect ComEd's proposal to offer LED lighting units to the FIL Delivery
211 Class, which I address later in this direct testimony. The 2013 FRU Rate Design includes
212 (a) cost inputs from the 2013 FRU ECOSS and (b) FIL data inputs that do not account for
213 the offering of LED lighting units. These differences in input data cause the RDI
214 Delivery Service Charges to differ from the 2013 FRU Delivery Service Charges.
215 However, reiterating, all the formulae and methodologies in the RDI Rate Design are the
216 same as those in the 2013 FRU Rate Design.

217 **Q. Is there a description pertaining to the 2013 FRU Rate Design and the RDI Rate**
218 **Design in a publicly available document?**

219 A. Yes. The provisions in the Determination of Delivery Service Charges section of
220 Rate DSPP describe the rate design model used in determining ComEd's delivery service
221 charges. Both the 2013 FRU Rate Design and the RDI Rate Design meet those
222 provisions and are consistent with the 2010 Rate Case Order, as further directed in the
223 2011 FR Case Order.

224 Q. **In general, if the rate design is altered, what is the overall impact on ComEd's Rate**
225 **Year Net Revenue Requirement?**

226 A. Changes in rate design have no impact on ComEd's Rate Year Net Revenue
227 Requirement. As I noted earlier, the rate design model determines the delivery service
228 charges that are designed to recover the Rate Year Net Revenue Requirement. Any
229 changes in rate design are made in the rate design model in a manner such that the
230 resultant delivery service charges continue to be designed to recover only the Rate Year
231 Net Revenue Requirement. Therefore, rate design change is a neutral proposition for
232 ComEd with respect to the Rate Year Net Revenue Requirement. However, it is
233 important to note that while ComEd's Rate Year Net Revenue Requirement will not
234 change if the rate design is altered, charges to customers will likely change (with
235 increases for some and corresponding decreases for others) if there is a change to the rate
236 design.

237 Q. **What are some of the features of the RDI Rate Design and the 2013 FRU Rate**
238 **Design as they pertain to residential customers?**

239 A. Both the 2013 FRU Rate Design and the RDI Rate Design determine customer charges
240 and distribution facilities charges ("DFCs") for the four residential delivery classes using
241 a methodology approved in the 2010 Rate Case Order, as further directed in the 2011 FR
242 Case Order. This methodology is also employed for the nonresidential WH Delivery
243 Class, in accordance with those Orders. Both rate designs also ensure that the Standard
244 Metering Service Charge is the same for all the residential delivery classes, as approved
245 in the 2010 Rate Case Order.

246 Q. **What is the revenue responsibility for each delivery class, shown as a percentage of**
247 **the costs allocated to the delivery class in the associated ECOSS, in the 2013 FRU**
248 **Rate Design and the RDI Rate Design?**

249 A. Shown as a percentage of the costs allocated to the delivery class in the associated
250 ECOSS, the revenue responsibility for any given delivery class in the RDI Rate Design is
251 the same as the revenue responsibility for that delivery class in the 2013 FRU Rate
252 Design. Specifically, the revenue responsibility for the ELL Delivery Class is 71.9%; the
253 HV Delivery Class is 85.3%; and the RR Delivery Class is 85.1%. Meanwhile, the
254 revenue responsibility for each of the SL, ML, LL, and VLL delivery classes is 101.8%.
255 The revenue responsibility for each of the remaining eight delivery classes is 100%.
256 These revenue responsibilities are in the 2013 FRU Rate Design and maintained in the
257 RDI Rate Design in accordance with the 2010 Rate Case Order. I refer to these revenue
258 responsibility percentages, collectively, as the Current Revenue Responsibility Levels.

259 Q. **How is the percentage of revenue responsibility for a delivery class determined?**

260 A. The percentage of revenue responsibility for a delivery class results from an examination
261 of two numbers. The first number is the portion of ComEd's overall costs of providing
262 delivery service allocated to that delivery class, which is determined in the associated
263 ECOSS.¹ The second number is the portion of the Rate Year Net Revenue Requirement
264 for which the delivery class is expected to be billed, which is determined in the rate
265 design model. That second number is then measured against the first number. The result
266 is the delivery class' percentage of revenue responsibility. This percentage simply

¹ The functionalization and allocation values and methodologies employed in a particular ECOSS affect the amount of the costs of providing delivery service allocated to any given delivery class.

267 reflects the level to which the delivery class is responsible (will be billed) for the costs of
268 delivery service allocated to that class as determined by the associated ECOSS. Thus, if
269 the revenue responsibility of a delivery class is equal to the costs allocated to that
270 delivery class in the associated ECOSS, then that group has a revenue responsibility of
271 100%. This condition is also referred to as being fully cost-based or at 100% of equal
272 percentage of embedded cost (“EPEC”).

273 The concept of revenue responsibility may best be explained in the following
274 example, using an electric utility with two delivery classes. The utility’s overall costs to
275 provide service amount to \$30. The utility’s ECOSS allocates \$10 of its overall costs to
276 Class A and \$20 to Class B. If the service charges are determined in a manner such that
277 Class A has a revenue responsibility of (is billed) \$10 and Class B has a revenue
278 responsibility of \$20, then both classes have a revenue responsibility of 100%. Both
279 classes are said to be at 100% of EPEC, or at fully cost-based rates. On the other hand, if
280 service charges are set such that Class A has a revenue responsibility of \$8, then Class A
281 has a revenue responsibility of 80%, and is said to be at 80% of EPEC. In order for the
282 utility to recover its overall costs of \$30, the revenue responsibility of Class B is set at
283 \$22, and Class B’s revenue responsibility is 110%, or at 110% of EPEC.

284 **Q. Would Sheet No. 430 of Rate DSPP need to be revised in order to make a change to**
285 **the Current Revenue Responsibility Levels?**

286 **A.** Yes. The following pertinent provisions from Sheet No. 430 of Rate DSPP would need
287 to be revised in order to make a change to the Current Revenue Responsibility Levels.

288 Those provisions call for the rate design model to make:

289 “an adjustment to provide for the ratable assignment of revenue
290 responsibility to the Small Load Delivery Class, Medium Load Delivery

291 Class, Large Load Delivery Class, and Very Large Load Delivery Class
292 that are attributable to but are not being assigned to the Extra Large Load
293 Delivery Class, the High Voltage Delivery Class, and the Railroad
294 Delivery Class consistent with the rate design approved by the ICC in
295 Docket No. 10-0467”

296 and

297 “adjustments to maintain the level of revenue responsibility approved for
298 the Extra Large Load Delivery Class, the High Voltage Delivery Class,
299 and the Railroad Delivery Class consistent with the rate design approved
300 by the ICC in Docket No. 10-0467.”

301 **Q. How do the 2013 FRU Rate Design and the RDI Rate Design ensure that ComEd’s**
302 **delivery service charges are intended to recover only the 2014 Rate Year Net**
303 **Revenue Requirement?**

304 A. The 2013 FRU Rate Design and the RDI Rate Design employ a methodology approved
305 by the Commission as described in Rate DSPP that was also previously approved by the
306 Commission in the 2010 Rate Case; the methodology incorporates the use of minor
307 adjustments to individual delivery service charges to provide for the recovery of the 2014
308 Rate Year Net Revenue Requirement with no over recovery while maintaining all the
309 previously mentioned rate design attributes.

310 **Q. What is ComEd’s position with respect to the 2013 FRU Rate Design, the RDI Rate**
311 **Design, and the current set of delivery classes?**

312 A. As a matter of general principle, it is ComEd’s position that cost recovery should reflect
313 cost causation. However, ComEd takes no position at this time as to the relative merits of
314 the 2013 FRU Rate Design or the RDI Rate Design as they relate to the costs allocated to
315 the delivery classes in the associated ECOSS. Also as a matter of general principle, it is
316 ComEd’s position that there should be a balance between (a) having broad-based delivery

317 classes that are simple and easy to understand and implement, and (b) having narrowly
318 defined delivery classes that allow for a high degree of precision in cost allocation and
319 revenue responsibility. As noted earlier in this testimony, ComEd is proposing no change
320 to the existing, Commission-approved delivery classes, but reserves the right to propose
321 changes to these classes in the future.

322 **III. DELIVERY SERVICE CHARGES**

323 **Q. Earlier you said the rate design model is used to determine delivery service charges**
324 **that are designed to recover the Rate Year Net Revenue Requirement. How are**
325 **delivery service charges determined in that model?**

326 A. Delivery service charges are determined in a manner similar to how the prices of other
327 goods and services are determined. At the most fundamental level, a price or charge is
328 determined by dividing the cost for providing the goods or services by the units of goods
329 or services sold. This concept may be best introduced with an example of a farmer that
330 sells 1,000 apples each year from his orchard that costs \$1,000 each year to maintain. In
331 order for the farmer to recover his costs, the price of each apple must be \$1.00.

332 In very general terms, delivery service charges are determined in the same way in
333 accordance with the following equation:

$$Delivery\ Service\ Charge = \frac{Annual\ Embedded\ Cost}{Annual\ Billing\ Determinant}$$

334
335 The value in the numerator in this equation is a dollar amount - analogous to the
336 \$1,000 cost to maintain the orchard in the example. The amount is determined in the

337 associated ECOSS. As addressed by Mr. Bjerning in ComEd Ex. 3.0, the results of an
338 ECOSS are used as cost inputs in the corresponding rate design model. The specific
339 ECOSS results include a total customer-related cost, a total meter-related cost, a total
340 distribution-related cost, and a total IEDT-related cost allocation for each delivery class.
341 Each of those values is used in the numerator to determine a delivery service charge.

342 The value in the denominator in this equation is a quantity - comparable to the
343 number of apples the farmer sells in the example. The quantity is determined from the
344 compilation of ComEd's historical billing data. The specific quantities include the
345 number of bills issued, number of lighting fixtures in use, billed kW, and kWh delivered
346 over the course of the previous year for each delivery class. In accordance with the
347 provisions of Rate DSPP and previous Commission direction, the kW and kWh values
348 are adjusted, as applicable, so that they are reflective of a year with normal weather
349 conditions. Each of those values is used in the denominator to determine a delivery
350 service charge.

351 It is important to note that while this equation forms the basis of the computation
352 of ComEd's delivery service charges, it is modified as necessary in the determination of
353 the delivery service charges in order to maintain all the previously mentioned rate design
354 attributes.

355 **Q. What are the specific delivery service charges on a customer's electric service bill**
356 **that are applied to recover the Rate Year Net Revenue Requirement?**

357 A. Most customers see four delivery service charges on a monthly bill for electric service
358 that are related to the Rate Year Net Revenue Requirement: (a) the customer charge, (b)
359 the standard metering service charge, (c) the DFC, and (d) the Illinois Electricity

360 Distribution Tax Charge (“IEDT”). Some nonresidential customers see separate, distinct
361 DFCs depending upon the voltages that enter the customer premises. In addition, some
362 nonresidential customers see transformer charges on monthly bills for electric delivery
363 service. I explain the purpose for each of these charges in this section.

364 **Q. What is the purpose of the customer charge?**

365 A. The customer charge is a fixed dollar per month (“\$/month”) charge that historically has
366 been designed to recover certain fixed costs that ComEd incurs to provide standard
367 electric service. For nonresidential customers, the customer charge has been designed to
368 recover costs associated with standard service connections, billing, payment processing,
369 and other customer services activities. With respect to some residential delivery classes,
370 the customer charges also provide for the recovery of a portion of the fixed distribution
371 system related costs. All residential customers in the same delivery class pay the same
372 customer charge, and all nonresidential customers in the same delivery class pay the same
373 customer charge. The rate design model does not develop customer charges for
374 customers in the lighting delivery classes. Instead, corresponding fixed costs assigned to
375 these classes are recovered through the DFCs.

376 **Q. What is the purpose of the standard metering service charge?**

377 A. The standard metering service charge is designed to recover costs that ComEd incurs for
378 the provision of standard metering service. More specifically, the standard metering
379 service charge has been designed to recover costs associated with standard metering
380 facilities, meter reading, and other meter-related services activities. The standard
381 metering service charge is determined on a delivery class basis, with the exception that a

382 single standard metering service charge is computed for all four residential delivery
383 classes. For most delivery classes, the standard metering service charge is a fixed
384 \$/month charge. However, for two lighting delivery classes, DDL and GL, the standard
385 metering service charge is a \$/kWh charge, which maintains consistency with the manner
386 in which charges have been historically applied. Meanwhile, there are two instances in
387 which a standard metering service charge is not applied: (1) for electric service provided
388 to the FIL Delivery Class because no metering is provided for FIL units and (2) for
389 electric service provided to customers taking service under Rate RDS – Retail Delivery
390 Service (“Rate RDS”) that choose a Metering Service Provider (“MSP”) to provide
391 metering service because ComEd is not providing these customers with metering service.

392 **Q. What is the purpose of the distribution facilities charge?**

393 **A.** The DFC historically has been designed to recover costs associated with standard
394 distribution facilities and distribution equipment, as well as operating and maintenance
395 activities necessary to deliver electric power and energy to retail customers in a standard
396 manner. For most nonresidential delivery classes, the DFCs are determined on a delivery
397 class basis, with distinctions for voltage levels. DFCs for higher voltages do not provide
398 for the recovery of costs associated with the provision of transformers, which are
399 recovered through the transformer charge as I explain later in this direct testimony. For
400 the WH, DDL, and GL delivery classes, as well as all the residential delivery classes, the
401 DFCs are \$/kWh charges. For each remaining nonresidential delivery class, the DFCs
402 are \$/kW charges. Meanwhile, for the FIL Delivery Class, the DFCs are \$/fixture
403 charges.

404 Q. **How is the DFC fixture charge for the FIL Delivery Class different from other**
405 **DFCs?**

406 A. DFC fixture charges are designed to recover costs associated with the provision,
407 installation, and maintenance of standard fixture-included lighting facilities, standard
408 customer-related services activities, standard distribution facilities and distribution
409 equipment, and the operating and maintenance activities necessary to deliver electric
410 power and energy to fixture-included lighting facilities in a standard manner. Each DFC
411 fixture charge is determined by the type of fixture provided.

412 Q. **What is the purpose of the transformer charge?**

413 A. The transformer charge is designed to recover costs associated with the provision of
414 standard primary voltage (“PV”) transformer facilities or HV transformer facilities, as
415 well as operating and maintenance activities applicable to such PV or HV transformers.
416 Transformer charges are applicable for certain nonresidential delivery classes. With the
417 exception of the WH, HV, and RR delivery classes, the transformer charge is determined
418 on a delivery class basis for service provided at primary voltage levels. The HV Delivery
419 Class has transformer charges with distinctions for service provided at high voltage
420 levels, as well as primary voltage levels. There are no transformer charges applicable to
421 the WH or RR delivery classes because neither PV transformers nor HV transformers are
422 used at the premises of customers in these delivery classes. Transformer charges are
423 \$/kW charges.

424 Q. **What is the purpose of the Illinois Electricity Distribution Tax Charge?**

425 A. The IEDT is designed to recover the Illinois Electricity Distribution Tax, which is levied
426 on the basis of kWh deliveries. It is a \$/kWh charge, which corresponds to the manner in
427 which the Illinois Electricity Distribution Tax is imposed upon ComEd.

428 **Q. What are the specific 2013 FRU Delivery Service Charges?**

429 A. The 2013 FRU Delivery Service Charges are provided in ComEd Ex. 2.03, which
430 presents the 2013 FRU Rate Design. As I previously noted, the 2013 FRU Rate Design
431 includes (a) cost inputs from the 2013 FRU ECOSS addressed in ComEd Ex. 3.0 by Mr.
432 Bjerning and (b) FIL data inputs that do not account for the proposed offering of LED
433 lighting units.

434 **Q. What are the specific RDI Delivery Service Charges?**

435 A. The RDI Delivery Service Charges are provided in ComEd Ex. 2.04, which presents the
436 RDI Rate Design. As I previously noted, the RDI Rate Design includes (a) cost inputs
437 from the RDI ECOSS addressed in ComEd Ex. 3.0 by Mr. Bjerning and (b) FIL data
438 inputs that reflect ComEd's proposal to offer LED lighting units to the FIL Delivery
439 Class, addressed later in this direct testimony. Again, as I previously noted, there are
440 differences between the 2013 FRU Delivery Service Charges and the RDI Delivery
441 Service Charges due to the differences in those inputs.

442 **Q. Aside from the delivery service charges, what other charges or adjustments are**
443 **determined directly through the use of costs identified in the ECOSS?**

444 A. In accordance with past Commission directives, ComEd determines the single bill option
445 ("SBO") credit on the basis of embedded costs which are identified in the ECOSS.
446 ComEd Ex. 2.05 presents the computation used to determine the SBO credit. The SBO

447 credit is applied to each monthly electric service bill for any customer that receives such
448 bills from its retail electric supplier (“RES”) with ComEd’s delivery service charges
449 included on those bills in accordance with Section 16-118(b) of the Act.

450 **Q. What is the connection between the SBO credit and the delivery service charges?**

451 A. The delivery service charges and the SBO credit are updated annually through the
452 formula rate update proceedings to reflect the annually updated costs in the ECOSS. The
453 SBO credit is essentially an offset to the customer charge applied to any delivery service
454 customer that is provided with consolidated billing by its RES.

455 **Q. Would there be any impact upon the SBO credit in the event that the RDI ECOSS is**
456 **adopted for use in determining delivery service charges?**

457 A. No. The computation of the SBO credit uses the total allowed revenue requirement
458 associated with the embedded costs pertaining to Bill Issue and Processing functions. In
459 the 2013 FRU ECOSS and the RDI ECOSS, the costs pertaining to Bill Issue and
460 Processing are the same; therefore, there is no change in the resulting SBO credit.

461 **IV. ILLUSTRATIVE DELIVERY SERVICE CHARGES**

462 **Q. What would the delivery service charges be if the RDI Rate Design is changed so**
463 **that each delivery class’ revenue responsibility is equal to 100%?**

464 A. ComEd Ex. 2.06 presents an illustrative populated rate design model and illustrative
465 delivery service charges that would result if the RDI Rate Design is changed so that each
466 delivery class’ revenue responsibility equals 100%.

467 **Q. Could the rate design be altered so that delivery classes’ revenue responsibilities are**
468 **set at other percentages?**

469 A. Yes. The rate design could be altered in any number of ways so that delivery classes'
470 revenue responsibilities are set at other percentages. For example, the Commission has
471 adjusted ComEd's proposed rate design in prior cases, which resulted in changes to the
472 percentage of revenue responsibility for various customer classes. (i.e., Docket No. 07-
473 0566 Order at 213; 2010 Rate Case Order at 257, 260, and 264) Of course, any change to
474 the revenue responsibility percentage responsibility for a particular delivery class must
475 have a corresponding change in percentage to one or more other delivery class(es). This
476 is necessary to ensure that the final sum of the revenue responsibility amounts for all
477 delivery classes equals the Rate Year Net Revenue Requirement.

478 Q. **Has there been any interest in a rate design that would reflect additional**
479 **“movement” toward a rate design in which each delivery class' revenue**
480 **responsibility is equal to 100%?**

481 A. Yes. In the months leading up to this proceeding, ComEd worked with various parties to
482 address cost allocation and rate design topics. During these discussions, parties
483 expressed interest in reviewing a rate design that would reflect the “next step” in a
484 movement toward a rate design in which each delivery class' revenue responsibility
485 equals 100%. This discussion about further movement towards 100% revenue
486 responsibility resulted from, among other things, prior Commission conclusions
487 indicating a preference for cost-based rates. See, e.g., ICC Order Docket No. 05-0597 at
488 189, 218, and 252; ICC Order Docket No. 07-0528/07-0531 (cons.) at 90-91; ICC Order
489 Docket No. 07-0566 at 205; and ICC Order Docket No. 10-0467 at 264. In response,
490 ComEd prepared an illustrative populated rate design model that would result if the RDI
491 Rate Design is changed for the SL, ML, LL, VLL, ELL, HV and RR delivery classes.

492 For the ELL and HV delivery classes, the change would reflect the “next step” – the third
493 step out of four (based on language from a prior Commission Order) – resulting in the
494 percentage of revenue responsibility for the ELL and HV delivery classes to move to
495 84.2% and 90.7%, respectively. For the RR delivery class, this illustrative rate design
496 would reflect the “next step” - the second step out of ten (based on language from a prior
497 Commission Order) - resulting in the percentage of revenue responsibility for the RR
498 delivery class to move to 82.6%. Correspondingly, for the SL, ML, LL, and VLL
499 delivery classes the resultant percentage of revenue responsibility moves to 101.1%. See
500 Table CST-D9: Revenue Responsibilities - 2013 FRU and ComEd Ex. 2.07 Illustrative.
501 This illustrative rate design, along with its illustrative delivery service charges, is
502 presented in ComEd Ex. 2.07. I refer to it as the Illustrative Next Step Rate Design.

503 **Q. Did ComEd develop an illustrative set of delivery service charges to correspond to**
504 **each illustrative ECOSS addressed in ComEd Ex. 3.0?**

505 A. Yes. In fact, ComEd developed two sets of illustrative delivery service charges using
506 cost data inputs from each illustrative ECOSS addressed in ComEd Ex. 3.0 by Mr.
507 Bjerning. One set provides illustrative delivery service charges that would result if the
508 Current Revenue Responsibility Levels are maintained. The other set provides
509 illustrative delivery service charges that would result if the revenue responsibility level
510 for each delivery class equals 100%². In developing each set, the FIL data inputs that
511 reflect ComEd’s proposal to offer LED lighting units to the FIL Delivery Class are
512 utilized in the associated rate design models. Table CST-D1 – Illustrative Rate Designs

² In some instances, the revenue responsibility of the DDL Delivery Class is 99.9% which rounds to 100%.

513 provides a listing of the exhibits that provide these illustrative rate designs, along with
514 pertinent details pertaining to the associated illustrative ECOSS and the revenue
515 responsibility level reflected in each set.

516 **Q. How do the 2013 FRU Rate Design, RDI Rate Design, and illustrative rate designs**
517 **you present help the Commission evaluate possible changes related to delivery**
518 **service cost allocation and rate design?**

519 A. The 2013 FRU Rate Design, RDI Rate Design, and the illustrative rate designs, with their
520 respective delivery service charges attached to this direct testimony, each reflect the 2014
521 Rate Year Net Revenue Requirement of \$2,334,330,000 presented in the petition filing to
522 initiate ComEd's second annual formula rate update proceeding. Therefore, this
523 information can be analyzed and compared directly to each other in order to gauge the
524 rate implications of specific tariff changes related to delivery service cost allocation and
525 rate design.

526 **V. 2013 FRU AND RDI DELIVERY SERVICE REVENUE RESPONSIBILITIES**

527 **Q. What are the 2013 FRU and RDI delivery service revenue responsibilities for each**
528 **delivery class?**

529 A. The 2013 FRU revenue responsibility and RDI revenue responsibility for each delivery
530 class are presented in Table CST-D3: 2013 FRU and RDI Revenue Responsibilities.
531 This table presents the data in total dollars, percentage of the costs allocated to the
532 delivery class in the associated ECOSS, and in overall ¢/kWh by individual delivery
533 class, as well as by the three sectors into which the delivery classes are grouped. The far

534 right hand column also shows how the RDI revenue responsibility dollar amounts are
535 different from the 2013 FRU revenue responsibility dollar amounts.

Table CST-D3: 2013 FRU and RDI Revenue Responsibilities							
Delivery Class	2013 FRU			RDI			Amount Change from 2013 FRU
	Amount	Percent of Cost	Unitized Amount	Amount	Percent of Cost	Unitized Amount	
	\$	%	¢/kWh	\$	%	¢/kWh	%
Residential							
SHNH	998,742,014	100.0	4.88	999,356,162	100.0	4.88	0.061%
MFNH	279,438,275	100.0	6.31	279,990,249	100.0	6.33	0.198%
SFH	17,913,976	100.0	2.39	17,925,680	100.0	2.39	0.065%
MFH	47,475,322	100.0	2.98	47,558,164	100.0	2.99	0.174%
Nonresidential							
WH	26,957,575	100.0	5.95	26,982,199	100.0	5.96	0.091%
SL	301,988,681	101.8	2.64	300,826,824	101.8	2.63	-0.385%
ML	182,054,399	101.8	1.75	181,985,860	101.8	1.75	-0.038%
LL	150,953,950	101.8	1.57	150,918,743	101.8	1.57	-0.023%
VLL	256,909,595	101.8	1.42	256,913,641	101.8	1.42	0.002%
ELL	32,374,012	71.9	0.83	32,369,926	71.9	0.83	-0.013%
HV	15,177,817	85.3	0.27	15,174,728	85.3	0.27	-0.020%
RR	4,826,745	85.1	0.87	4,826,225	85.1	0.87	-0.011%
Lighting							
FIL	14,535,253	100.0	9.15	14,532,570	100.0	9.15	-0.018%
DDL	4,083,436	100.0	0.72	4,072,046	100.0	0.71	-0.279%
GL	898,950	100.0	1.37	896,983	100.0	1.37	-0.219%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,343,569,587	100.0	4.93	1,344,830,255	100.0	4.94	0.094%
Nonresidential	971,242,774	100.0	1.62	969,998,146	100.0	1.62	-0.128%
Lighting	19,517,639	100.0	2.46	19,501,599	100.0	2.46	-0.082%

536

537 **Q. To what extent do the delivery classes' and sectors' revenue responsibilities change**
538 **if the RDI Delivery Service Charges are adopted?**

539 **A.** As shown in the far right hand column in Table CST-D3, there are relatively small
540 impacts on the delivery classes' and sectors' total dollar amount revenue responsibilities
541 if the RDI ECOSS and RDI Rate Design are adopted when compared to the 2013 FRU
542 ECOSS and 2013 FRU Rate Design. Specifically, the changes are less than one half of
543 one percent. With respect to revenue responsibility shown as a percent of the costs
544 allocated to the delivery class in the associated ECOSS, there is no change if the RDI
545 ECOSS and RDI Rate Design are adopted.

546 **VI. 2013 FRU AND RDI DELIVERY SERVICE ANNUAL BILLS**

547 **A. 2013 FRU and RDI Residential Annual Bills**

548 1. Average

549 **Q. What are the estimated residential delivery classes' average annual delivery service**
550 **bills under the 2013 FRU Rate Design and RDI Rate Design?**

551 A. Table CST-D4: Average Residential Estimated Annual Bills – 2013 FRU and RDI
552 summarizes the estimated class average annual delivery service bills for each residential
553 delivery class under the 2013 FRU Rate Design and RDI Rate Design.

Table CST-D4: Average Residential Estimated Annual Bills – 2013 FRU and RDI				
Delivery Class	Average 2012 Annual kWh Delivered	Annual Delivery Service Bill 2013 FRU	Annual Delivery Service Bill RDI	Change from 2013 FRU
	kWh	\$	\$	%
SFNH	9,171	447.43	447.70	0.060
MFNH	4,249	268.29	268.82	0.198
SFH	21,442	511.84	512.17	0.064
MFH	9,997	297.94	298.46	0.175

554

555 2. Low Use Residential

556 **Q. What are the estimated annual delivery service bills for residential customers with**
557 **relatively low electricity use under the 2013 FRU Rate Design and RDI Rate**
558 **Design?**

559 A. Table CST-D5: Low Use Residential Estimated Annual Bills – 2013 FRU and RDI
560 summarizes the estimated annual delivery service bills for residential customers with
561 relatively low electricity use in each residential delivery class under the 2013 FRU Rate
562 Design and RDI Rate Design. The average annual kWh delivered for customers in the
563 25th percentile in each residential delivery class was used to determine the annual kWh
564 delivered for a low use customer in that delivery class. Low use represents a customer at

565 the 25th percentile usage level in the class, which means a customer for which 25% of
566 other customers in the class have less annual usage.

Table CST-D5: Low Use Residential Estimated Annual Bills – 2013 FRU and RDI				
<i>Delivery Class</i>	Annual kWh Delivered 2012	Annual Delivery Service Bill 2013 FRU	Annual Delivery Service Bill RDI	Change from 2013 FRU
	kWh	\$	\$	%
SFNH	6,095	370.65	370.83	0.049
MFNH	2,517	212.59	213.05	0.216
SFH	12,490	399.85	400.10	0.063
MFH	5,540	228.99	229.33	0.148

567

568 3. High Use Residential

569 **Q. What are the estimated annual delivery service bills for residential customers with**
570 **relatively high electricity use under the 2013 FRU Rate Design and RDI Rate**
571 **Design?**

572 **A.** Table CST-D6: High Use Residential Estimated Annual Bills – 2013 FRU and RDI
573 summarizes the estimated annual delivery service bills for residential customers with
574 relatively high electricity use in each residential delivery class under the 2013 FRU Rate
575 Design and RDI Rate Design. The average annual kWh delivered for customers in the
576 75th percentile in each residential delivery class was used to determine the annual kWh
577 delivered for a high use customer in that delivery class.

Table CST-D6: High Use Residential Estimated Annual Bills – 2013 FRU and RDI				
<i>Delivery Class</i>	Annual kWh Delivered 2012	Annual Delivery Service Bill 2013 FRU	Annual Delivery Service Bill RDI	Change from 2013 FRU
	kWh	\$	\$	%
SFNH	12,286	525.18	525.55	0.070
MFNH	5,876	320.62	321.21	0.184
SFH	24,589	551.21	551.57	0.065
MFH	11,939	327.98	328.57	0.180

578

579 **B. 2013 FRU and RDI Nonresidential Annual Bills**

580 Q. **What are the estimated nonresidential delivery classes' average annual delivery**
581 **service bills under the 2013 FRU Rate Design and RDI Rate Design?**

582 A. Table CST-D7: Average Nonresidential Estimated Annual Bills – 2013 FRU and RDI
583 summarizes the estimated class average annual delivery service bills for the WH and SL
584 nonresidential delivery classes under 2013 FRU Rate Design and RDI Rate Design.

Table CST-D7: Average Nonresidential Estimated Annual Bills – 2013 FRU and RDI				
Delivery Class	Average 2012 Annual kWh Delivered	Annual Delivery Service Bill 2013 FRU	Annual Delivery Service Bill RDI	Change from 2013 FRU
	kWh	\$	\$	%
WH	4,929	293.26	293.53	0.092
SL	46,069	1,216.44	1,211.76	-0.385

585
586 Due to the widely varying nature of customers within the other delivery classes in the
587 nonresidential sector there is little value in estimating average annual bills that do not
588 reflect any typical customers.

589 **C. 2013 FRU and RDI Lighting Annual Bills**

590 Q. **Did ComEd estimate lighting delivery class average annual delivery service bills**
591 **under the 2013 FRU Rate Design and RDI Rate Design?**

592 A. No. Due to the widely varying nature of customers within the lighting sector there is
593 little value in estimating average annual bills that do not reflect any typical customers.

594 **VII. ILLUSTRATIVE DELIVERY SERVICE REVENUE RESPONSIBILITIES**

595 Q. **What would the revenue responsibilities be for each delivery class if the illustrative**
596 **rate design presented in ComEd Ex. 2.06 is adopted for use in determining delivery**
597 **service charges?**

598 A. As previously explained, ComEd Ex. 2.06 presents an illustrative rate design and
 599 illustrative delivery service charges that would result if the RDI Rate Design is changed
 600 so that the revenue responsibility for each delivery class equals 100%. The revenue
 601 responsibilities for each delivery class using the illustrative rate design presented in
 602 ComEd Ex. 2.06 is presented in Table CST-D8: Revenue Responsibilities – RDI and
 603 ComEd Ex. 2.06 Illustrative. Similar to Table CST-D3, this table presents the data in
 604 total dollars, percentage of the costs allocated to the delivery class in the RDI ECOSS,
 605 and in overall ¢/kWh by individual delivery class, as well as by the three sectors into
 606 which the delivery classes are segmented. RDI revenue responsibilities are shown in the
 607 table, and the far right hand column shows how the illustrative dollar amount revenue
 608 responsibilities are different from the RDI dollar amount revenue responsibilities.

609

Table CST-D8: Revenue Responsibilities – RDI and ComEd Ex. 2.06 Illustrative							
Delivery Class	RDI			Cost Inputs from RDI ECOSS Revenue Responsibilities Equal 100%			Amount Change from RDI
	Amount	Percent of Cost	Unitized Amount	Amount	Percent of Cost	Unitized Amount	
	\$	%	¢/kWh	\$	%	¢/kWh	%
Residential							
SHNH	999,356,162	100.0	4.88	999,356,162	100.0	4.88	0.000%
MFNH	279,990,249	100.0	6.33	279,990,249	100.0	6.33	0.000%
SFH	17,925,680	100.0	2.39	17,925,680	100.0	2.39	0.000%
MFH	47,558,164	100.0	2.99	47,558,164	100.0	2.99	0.000%
Nonresidential							
WH	26,982,199	100.0	5.96	26,982,199	100.0	5.96	0.000%
SL	300,826,824	101.8	2.63	295,382,316	100.0	2.58	-1.810%
ML	181,985,860	101.8	1.75	178,782,785	100.0	1.72	-1.760%
LL	150,918,743	101.8	1.57	148,253,680	100.0	1.54	-1.766%
VLL	256,913,641	101.8	1.42	252,164,070	100.0	1.39	-1.849%
ELL	32,369,926	71.9	0.83	44,981,270	100.0	1.16	38.960%
HV	15,174,728	85.3	0.27	17,785,266	100.0	0.32	17.203%
RR	4,826,225	85.1	0.87	5,666,560	100.0	1.02	17.412%
Lighting							
FIL	14,532,570	100.0	9.15	14,532,570	100.0	9.15	0.000%
DDL	4,072,046	100.0	0.71	4,072,046	100.0	0.71	0.000%
GL	896,983	100.0	1.37	896,983	100.0	1.37	0.000%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,344,830,255	100.0	4.94	0.000%
Nonresidential	969,998,146	100.0	1.62	969,998,146	100.0	1.62	0.000%
Lighting	19,501,599	100.0	2.46	19,501,599	100.0	2.46	0.000%

610

611 Q. **What would the revenue responsibilities be for each delivery class if the Illustrative**
612 **Next Step Rate Design presented in ComEd Ex. 2.07 is adopted for use in**
613 **determining delivery service charges?**

614 A. As previously explained, ComEd Ex. 2.07 presents an illustrative rate design and
615 illustrative delivery service charges that would result if the RDI Rate Design is changed
616 so that a third step out of four - to charges that reflect 84.2% and 90.7% of the associated
617 costs allocated to the delivery classes in the RDI ECOSS - is made for the ELL and HV
618 delivery classes, respectively, while a second step out of ten is made for the RR Delivery
619 Class. Interestingly, in making that “next step” for the Railroad Delivery Class in a
620 manner consistent with the previously made first step, the resultant charges reflect 82.6%
621 of the associated costs allocated to the delivery class in the RDI ECOSS. The resultant
622 revenue responsibilities for each delivery class using the Illustrative Next Step Rate
623 Design in ComEd Ex. 2.07 are presented in Table CST-D9: Revenue Responsibilities –
624 RDI and ComEd Ex. 2.07 Illustrative. Similar to Table CST-D3, this table presents the
625 data in total dollars, percentage of the costs allocated to the delivery class in the RDI
626 ECOSS, and in overall ¢/kWh by individual delivery class, as well as by the three sectors
627 into which the delivery classes are segmented. RDI revenue responsibilities are shown in
628 the table, and the far right hand column shows how the illustrative revenue responsibility
629 dollar amounts are different from the RDI revenue responsibility dollar amounts.

Table CST-D9: Revenue Responsibilities – RDI and ComEd Ex. 2.07 Illustrative							
Delivery Class	RDI			Cost Inputs from RDI ECOSS Next Step Revenue Responsibilities			Amount Change from RDI
	Amount	Percent of Cost	Unitized Amount	Amount	Percent of Cost	Unitized Amount	
	\$	%	¢/kWh	\$	%	¢/kWh	%
Residential							
SHNH	999,356,162	100.0	4.88	999,356,162	100.0	4.88	0.000%
MFNH	279,990,249	100.0	6.33	279,990,249	100.0	6.33	0.000%
SFH	17,925,680	100.0	2.39	17,925,680	100.0	2.39	0.000%
MFH	47,558,164	100.0	2.99	47,558,164	100.0	2.99	0.000%
Nonresidential							
WH	26,982,199	100.0	5.96	26,982,199	100.0	5.96	0.000%
SL	300,826,824	101.8	2.63	298,655,140	101.1	2.61	-0.722%
ML	181,985,860	101.8	1.75	180,731,605	101.1	1.74	-0.689%
LL	150,918,743	101.8	1.57	149,837,766	101.1	1.56	-0.716%
VLL	256,913,641	101.8	1.42	255,105,784	101.1	1.41	-0.704%
ELL	32,369,926	71.9	0.83	37,867,937	84.2	0.97	16.985%
HV	15,174,728	85.3	0.27	16,133,111	90.7	0.29	6.316%
RR	4,826,225	85.1	0.87	4,684,604	82.6	0.85	-2.934%
Lighting							
FIL	14,532,570	100.0	9.15	14,532,570	100.0	9.15	0.000%
DDL	4,072,046	100.0	0.71	4,072,046	100.0	0.71	0.000%
GL	896,983	100.0	1.37	896,983	100.0	1.37	0.000%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,344,830,255	100.0	4.94	0.000%
Nonresidential	969,998,146	100.0	1.62	969,998,146	100.0	1.62	0.000%
Lighting	19,501,599	100.0	2.46	19,501,599	100.0	2.46	0.000%

630

631 Q. What would the revenue responsibilities be for each delivery class if one of the other
632 illustrative rate designs listed in Table CST-D1 is adopted for use in determining
633 delivery service charges?

634 A. The following tables, Table CST-D10 through Table CST-D21, present the revenue
635 responsibilities for each delivery class using the other illustrative rate designs,
636 respectively, listed in Table CST-D1. Similar to Table CST-D3, each of the following
637 Table CST-D10 through Table CST-D21 presents the data in total dollars, percentage of
638 the costs allocated to the delivery class in the RDI ECOSS, and in overall ¢/kWh by
639 individual delivery class, as well as by the three sectors into which the delivery classes
640 are segmented. RDI revenue responsibilities are shown in each table, and the far right

641 hand column in each table shows how the illustrative revenue responsibility dollar
642 amounts are different from the RDI revenue responsibility dollar amounts.

Table CST-D10: Revenue Responsibilities – RDI and ComEd Ex. 2.08 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.10 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	994,961,416	100.0	4.86	-0.440%
MFNH	279,990,249	100.0	6.33	279,092,003	100.0	6.31	-0.321%
SFH	17,925,680	100.0	2.39	17,608,489	100.0	2.35	-1.769%
MFH	47,558,164	100.0	2.99	46,774,284	100.0	2.94	-1.648%
Nonresidential							
WH	26,982,199	100.0	5.96	26,888,234	100.0	5.93	-0.348%
SL	300,826,824	101.8	2.63	299,552,763	101.8	2.62	-0.424%
ML	181,985,860	101.8	1.75	183,721,499	101.8	1.77	0.954%
LL	150,918,743	101.8	1.57	153,001,583	101.8	1.59	1.380%
VLL	256,913,641	101.8	1.42	261,091,548	101.8	1.44	1.626%
ELL	32,369,926	71.9	0.83	32,510,379	71.9	0.84	0.434%
HV	15,174,728	85.3	0.27	15,189,869	85.3	0.27	0.100%
RR	4,826,225	85.1	0.87	4,800,297	85.1	0.87	-0.537%
Lighting							
FIL	14,532,570	100.0	9.15	14,433,860	100.0	9.09	-0.679%
DDL	4,072,046	100.0	0.71	3,810,069	99.9	0.67	-6.434%
GL	896,983	100.0	1.37	893,707	100.0	1.36	-0.365%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,338,436,192	100.0	4.91	-0.475%
Nonresidential	969,998,146	100.0	1.62	976,756,172	100.0	1.63	0.697%
Lighting	19,501,599	100.0	2.46	19,137,636	100.0	2.41	-1.866%

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Table CST-D11: Revenue Responsibilities – RDI and ComEd Ex. 2.09 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.10 Revenue Responsibilities Equal 100%			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	994,961,416	100.0	4.86	-0.440%
MFNH	279,990,249	100.0	6.33	279,092,003	100.0	6.31	-0.321%
SFH	17,925,680	100.0	2.39	17,608,489	100.0	2.35	-1.769%
MFH	47,558,164	100.0	2.99	46,774,284	100.0	2.94	-1.648%
Nonresidential							
WH	26,982,199	100.0	5.96	26,888,234	100.0	5.93	-0.348%
SL	300,826,824	101.8	2.63	294,167,034	100.0	2.57	-2.214%
ML	181,985,860	101.8	1.75	180,420,809	100.0	1.73	-0.860%
LL	150,918,743	101.8	1.57	150,316,568	100.0	1.56	-0.399%
VLL	256,913,641	101.8	1.42	256,298,132	100.0	1.42	-0.240%
ELL	32,369,926	71.9	0.83	45,204,553	100.0	1.16	39.650%
HV	15,174,728	85.3	0.27	17,814,930	100.0	0.32	17.399%
RR	4,826,225	85.1	0.87	5,645,912	100.0	1.02	16.984%
Lighting							
FIL	14,532,570	100.0	9.15	14,433,860	100.0	9.09	-0.679%
DDL	4,072,046	100.0	0.71	3,810,069	99.9	0.67	-6.434%
GL	896,983	100.0	1.37	893,707	100.0	1.36	-0.365%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,338,436,192	100.0	4.91	-0.475%
Nonresidential	969,998,146	100.0	1.62	976,756,172	100.0	1.63	0.697%
Lighting	19,501,599	100.0	2.46	19,137,636	100.0	2.41	-1.866%

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Table CST-D12: Revenue Responsibilities – RDI and ComEd Ex. 2.10 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.12 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	999,765,595	100.0	4.88	0.041%
MFNH	279,990,249	100.0	6.33	279,998,043	100.0	6.33	0.003%
SFH	17,925,680	100.0	2.39	17,933,185	100.0	2.39	0.042%
MFH	47,558,164	100.0	2.99	47,574,094	100.0	2.99	0.033%
Nonresidential							
WH	26,982,199	100.0	5.96	26,997,760	100.0	5.96	0.058%
SL	300,826,824	101.8	2.63	300,856,615	101.8	2.63	0.010%
ML	181,985,860	101.8	1.75	182,056,476	101.8	1.75	0.039%
LL	150,918,743	101.8	1.57	151,011,616	101.8	1.57	0.062%
VLL	256,913,641	101.8	1.42	256,951,418	101.8	1.42	0.015%
ELL	32,369,926	71.9	0.83	31,847,136	71.9	0.82	-1.615%
HV	15,174,728	85.3	0.27	15,179,538	85.3	0.27	0.032%
RR	4,826,225	85.1	0.87	4,656,269	85.1	0.84	-3.522%
Lighting							
FIL	14,532,570	100.0	9.15	14,532,570	100.0	9.15	0.000%
DDL	4,072,046	100.0	0.71	4,072,046	100.0	0.71	0.000%
GL	896,983	100.0	1.37	897,639	100.0	1.37	0.073%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,345,270,917	100.0	4.94	0.033%
Nonresidential	969,998,146	100.0	1.62	969,556,828	100.0	1.62	-0.045%
Lighting	19,501,599	100.0	2.46	19,502,255	100.0	2.46	0.003%

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Table CST-D13: Revenue Responsibilities – RDI and ComEd Ex. 2.11 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.12 Revenue Responsibilities Equal 100%			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	999,765,595	100.0	4.88	0.041%
MFNH	279,990,249	100.0	6.33	279,998,043	100.0	6.33	0.003%
SFH	17,925,680	100.0	2.39	17,933,185	100.0	2.39	0.042%
MFH	47,558,164	100.0	2.99	47,574,094	100.0	2.99	0.033%
Nonresidential							
WH	26,982,199	100.0	5.96	26,997,760	100.0	5.96	0.058%
SL	300,826,824	101.8	2.63	295,560,730	100.0	2.58	-1.751%
ML	181,985,860	101.8	1.75	178,795,680	100.0	1.72	-1.753%
LL	150,918,743	101.8	1.57	148,259,884	100.0	1.54	-1.762%
VLL	256,913,641	101.8	1.42	252,403,796	100.0	1.40	-1.755%
ELL	32,369,926	71.9	0.83	44,275,829	100.0	1.14	36.781%
HV	15,174,728	85.3	0.27	17,789,946	100.0	0.32	17.234%
RR	4,826,225	85.1	0.87	5,473,203	100.0	0.99	13.405%
Lighting							
FIL	14,532,570	100.0	9.15	14,532,570	100.0	9.15	0.000%
DDL	4,072,046	100.0	0.71	4,072,046	100.0	0.71	0.000%
GL	896,983	100.0	1.37	897,639	100.0	1.37	0.073%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,345,270,917	100.0	4.94	0.033%
Nonresidential	969,998,146	100.0	1.62	969,556,828	100.0	1.62	-0.045%
Lighting	19,501,599	100.0	2.46	19,502,255	100.0	2.46	0.003%

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Table CST-D14: Revenue Responsibilities – RDI and ComEd Ex. 2.12 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.14 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	994,551,984	100.0	4.86	-0.481%
MFNH	279,990,249	100.0	6.33	279,055,538	100.0	6.31	-0.334%
SFH	17,925,680	100.0	2.39	17,611,793	100.0	2.35	-1.751%
MFH	47,558,164	100.0	2.99	46,758,354	100.0	2.94	-1.682%
Nonresidential							
WH	26,982,199	100.0	5.96	26,872,671	100.0	5.93	-0.406%
SL	300,826,824	101.8	2.63	299,492,711	101.9	2.62	-0.443%
ML	181,985,860	101.8	1.75	183,665,638	101.9	1.76	0.923%
LL	150,918,743	101.8	1.57	153,019,186	101.9	1.59	1.392%
VLL	256,913,641	101.8	1.42	260,950,919	101.9	1.44	1.571%
ELL	32,369,926	71.9	0.83	33,033,169	71.9	0.85	2.049%
HV	15,174,728	85.3	0.27	15,199,045	85.3	0.27	0.160%
RR	4,826,225	85.1	0.87	4,982,011	85.1	0.90	3.228%
Lighting							
FIL	14,532,570	100.0	9.15	14,433,860	100.0	9.09	-0.679%
DDL	4,072,046	100.0	0.71	3,810,069	99.9	0.67	-6.434%
GL	896,983	100.0	1.37	893,052	100.0	1.36	-0.438%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,337,977,669	100.0	4.91	-0.510%
Nonresidential	969,998,146	100.0	1.62	977,215,350	100.0	1.63	0.744%
Lighting	19,501,599	100.0	2.46	19,136,981	100.0	2.41	-1.870%

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Table CST-D15: Revenue Responsibilities – RDI and ComEd Ex. 2.13 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.14 Revenue Responsibilities Equal 100%			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	994,551,984	100.0	4.86	-0.481%
MFNH	279,990,249	100.0	6.33	279,055,538	100.0	6.31	-0.334%
SFH	17,925,680	100.0	2.39	17,611,793	100.0	2.35	-1.751%
MFH	47,558,164	100.0	2.99	46,758,354	100.0	2.94	-1.682%
Nonresidential							
WH	26,982,199	100.0	5.96	26,872,671	100.0	5.93	-0.406%
SL	300,826,824	101.8	2.63	294,047,869	100.0	2.57	-2.253%
ML	181,985,860	101.8	1.75	180,296,410	100.0	1.73	-0.928%
LL	150,918,743	101.8	1.57	150,185,806	100.0	1.56	-0.486%
VLL	256,913,641	101.8	1.42	256,208,090	100.0	1.42	-0.275%
ELL	32,369,926	71.9	0.83	45,939,534	100.0	1.18	41.920%
HV	15,174,728	85.3	0.27	17,813,699	100.0	0.32	17.391%
RR	4,826,225	85.1	0.87	5,851,271	100.0	1.06	21.239%
Lighting							
FIL	14,532,570	100.0	9.15	14,433,860	100.0	9.09	-0.679%
DDL	4,072,046	100.0	0.71	3,810,069	99.9	0.67	-6.434%
GL	896,983	100.0	1.37	893,052	100.0	1.36	-0.438%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,337,977,669	100.0	4.91	-0.510%
Nonresidential	969,998,146	100.0	1.62	977,215,350	100.0	1.63	0.744%
Lighting	19,501,599	100.0	2.46	19,136,981	100.0	2.41	-1.870%

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Table CST-D16: Revenue Responsibilities – RDI and ComEd Ex. 2.14 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.16 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	1,003,010,475	100.0	4.90	0.366%
MFNH	279,990,249	100.0	6.33	277,456,954	100.0	6.27	-0.905%
SFH	17,925,680	100.0	2.39	18,044,515	100.0	2.40	0.663%
MFH	47,558,164	100.0	2.99	47,280,941	100.0	2.97	-0.583%
Nonresidential							
WH	26,982,199	100.0	5.96	26,365,225	100.0	5.82	-2.287%
SL	300,826,824	101.8	2.63	300,469,330	101.8	2.63	-0.119%
ML	181,985,860	101.8	1.75	183,001,479	101.8	1.76	0.558%
LL	150,918,743	101.8	1.57	151,596,217	101.8	1.58	0.449%
VLL	256,913,641	101.8	1.42	255,391,680	101.8	1.41	-0.592%
ELL	32,369,926	71.9	0.83	32,302,259	71.9	0.83	-0.209%
HV	15,174,728	85.3	0.27	15,145,489	85.3	0.27	-0.193%
RR	4,826,225	85.1	0.87	4,813,286	85.1	0.87	-0.268%
Lighting							
FIL	14,532,570	100.0	9.15	14,518,803	100.0	9.14	-0.095%
DDL	4,072,046	100.0	0.71	4,043,571	99.9	0.71	-0.699%
GL	896,983	100.0	1.37	889,776	100.0	1.36	-0.803%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,345,792,885	100.0	4.94	0.072%
Nonresidential	969,998,146	100.0	1.62	969,084,965	100.0	1.61	-0.094%
Lighting	19,501,599	100.0	2.46	19,452,150	100.0	2.45	-0.254%

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Table CST-D17: Revenue Responsibilities – RDI and ComEd Ex. 2.15 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.16 Revenue Responsibilities Equal 100%			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	1,003,010,475	100.0	4.90	0.366%
MFNH	279,990,249	100.0	6.33	277,456,954	100.0	6.27	-0.905%
SFH	17,925,680	100.0	2.39	18,044,515	100.0	2.40	0.663%
MFH	47,558,164	100.0	2.99	47,280,941	100.0	2.97	-0.583%
Nonresidential							
WH	26,982,199	100.0	5.96	26,365,225	100.0	5.82	-2.287%
SL	300,826,824	101.8	2.63	295,114,195	100.0	2.58	-1.899%
ML	181,985,860	101.8	1.75	179,675,865	100.0	1.73	-1.269%
LL	150,918,743	101.8	1.57	148,844,646	100.0	1.55	-1.374%
VLL	256,913,641	101.8	1.42	250,751,093	100.0	1.39	-2.399%
ELL	32,369,926	71.9	0.83	44,927,662	100.0	1.15	38.794%
HV	15,174,728	85.3	0.27	17,750,856	100.0	0.32	16.976%
RR	4,826,225	85.1	0.87	5,655,423	100.0	1.02	17.181%
Lighting							
FIL	14,532,570	100.0	9.15	14,518,803	100.0	9.14	-0.095%
DDL	4,072,046	100.0	0.71	4,043,571	99.9	0.71	-0.699%
GL	896,983	100.0	1.37	889,776	100.0	1.36	-0.803%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,345,792,885	100.0	4.94	0.072%
Nonresidential	969,998,146	100.0	1.62	969,084,965	100.0	1.61	-0.094%
Lighting	19,501,599	100.0	2.46	19,452,150	100.0	2.45	-0.254%

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Table CST-D18: Revenue Responsibilities – RDI and ComEd Ex. 2.16 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.17 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	996,315,998	100.0	4.87	-0.304%
MFNH	279,990,249	100.0	6.33	279,305,499	100.0	6.31	-0.245%
SFH	17,925,680	100.0	2.39	17,830,254	100.0	2.38	-0.532%
MFH	47,558,164	100.0	2.99	47,347,853	100.0	2.97	-0.442%
Nonresidential							
WH	26,982,199	100.0	5.96	27,087,194	100.0	5.98	0.389%
SL	300,826,824	101.8	2.63	302,699,659	101.8	2.65	0.623%
ML	181,985,860	101.8	1.75	182,772,585	101.8	1.76	0.432%
LL	150,918,743	101.8	1.57	151,398,713	101.8	1.57	0.318%
VLL	256,913,641	101.8	1.42	257,562,457	101.8	1.42	0.253%
ELL	32,369,926	71.9	0.83	32,403,215	71.9	0.83	0.103%
HV	15,174,728	85.3	0.27	15,175,688	85.3	0.27	0.006%
RR	4,826,225	85.1	0.87	4,826,228	85.1	0.87	0.000%
Lighting							
FIL	14,532,570	100.0	9.15	14,555,693	100.0	9.17	0.159%
DDL	4,072,046	100.0	0.71	4,146,084	100.0	0.73	1.818%
GL	896,983	100.0	1.37	902,880	100.0	1.38	0.657%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,340,799,604	100.0	4.92	-0.300%
Nonresidential	969,998,146	100.0	1.62	973,925,739	100.0	1.62	0.405%
Lighting	19,501,599	100.0	2.46	19,604,657	100.0	2.47	0.528%

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Table CST-D19: Revenue Responsibilities – RDI and ComEd Ex. 2.17 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.17 Revenue Responsibilities Equal 100%			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	996,315,998	100.0	4.87	-0.304%
MFNH	279,990,249	100.0	6.33	279,305,499	100.0	6.31	-0.245%
SFH	17,925,680	100.0	2.39	17,830,254	100.0	2.38	-0.532%
MFH	47,558,164	100.0	2.99	47,347,853	100.0	2.97	-0.442%
Nonresidential							
WH	26,982,199	100.0	5.96	27,087,194	100.0	5.98	0.389%
SL	300,826,824	101.8	2.63	297,314,734	100.0	2.60	-1.167%
ML	181,985,860	101.8	1.75	179,455,279	100.0	1.72	-1.391%
LL	150,918,743	101.8	1.57	148,660,722	100.0	1.55	-1.496%
VLL	256,913,641	101.8	1.42	252,886,340	100.0	1.40	-1.568%
ELL	32,369,926	71.9	0.83	45,066,819	100.0	1.16	39.224%
HV	15,174,728	85.3	0.27	17,786,420	100.0	0.32	17.211%
RR	4,826,225	85.1	0.87	5,668,231	100.0	1.02	17.446%
Lighting							
FIL	14,532,570	100.0	9.15	14,555,693	100.0	9.17	0.159%
DDL	4,072,046	100.0	0.71	4,146,084	100.0	0.73	1.818%
GL	896,983	100.0	1.37	902,880	100.0	1.38	0.657%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,340,799,604	100.0	4.92	-0.300%
Nonresidential	969,998,146	100.0	1.62	973,925,739	100.0	1.62	0.405%
Lighting	19,501,599	100.0	2.46	19,604,657	100.0	2.47	0.528%

655

Table CST-D20: Revenue Responsibilities – RDI and ComEd Ex. 2.18 Illustrative

Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.18 Current Revenue Responsibility Levels			Amount Change from RDI %
	Amount	Percent of Cost	Unitized	Amount	Percent of Cost	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	997,529,006	100.0	4.87	-0.183%
MFNH	279,990,249	100.0	6.33	279,607,513	100.0	6.32	-0.137%
SFH	17,925,680	100.0	2.39	17,865,368	100.0	2.38	-0.336%
MFH	47,558,164	100.0	2.99	47,437,079	100.0	2.98	-0.255%
Nonresidential							
WH	26,982,199	100.0	5.96	27,042,478	100.0	5.97	0.223%
SL	300,826,824	101.8	2.63	301,956,483	101.8	2.64	0.376%
ML	181,985,860	101.8	1.75	182,417,645	101.8	1.75	0.237%
LL	150,918,743	101.8	1.57	151,152,795	101.8	1.57	0.155%
VLL	256,913,641	101.8	1.42	257,255,027	101.8	1.42	0.133%
ELL	32,369,926	71.9	0.83	32,428,306	71.9	0.83	0.180%
HV	15,174,728	85.3	0.27	15,176,478	85.3	0.27	0.012%
RR	4,826,225	85.1	0.87	4,826,225	85.1	0.87	0.000%
Lighting							
FIL	14,532,570	100.0	9.15	14,568,237	100.0	9.18	0.245%
DDL	4,072,046	100.0	0.71	4,163,169	99.9	0.73	2.238%
GL	896,983	100.0	1.37	904,191	100.0	1.38	0.804%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,342,438,966	100.0	4.93	-0.178%
Nonresidential	969,998,146	100.0	1.62	972,255,437	100.0	1.62	0.233%
Lighting	19,501,599	100.0	2.46	19,635,597	100.0	2.47	0.687%

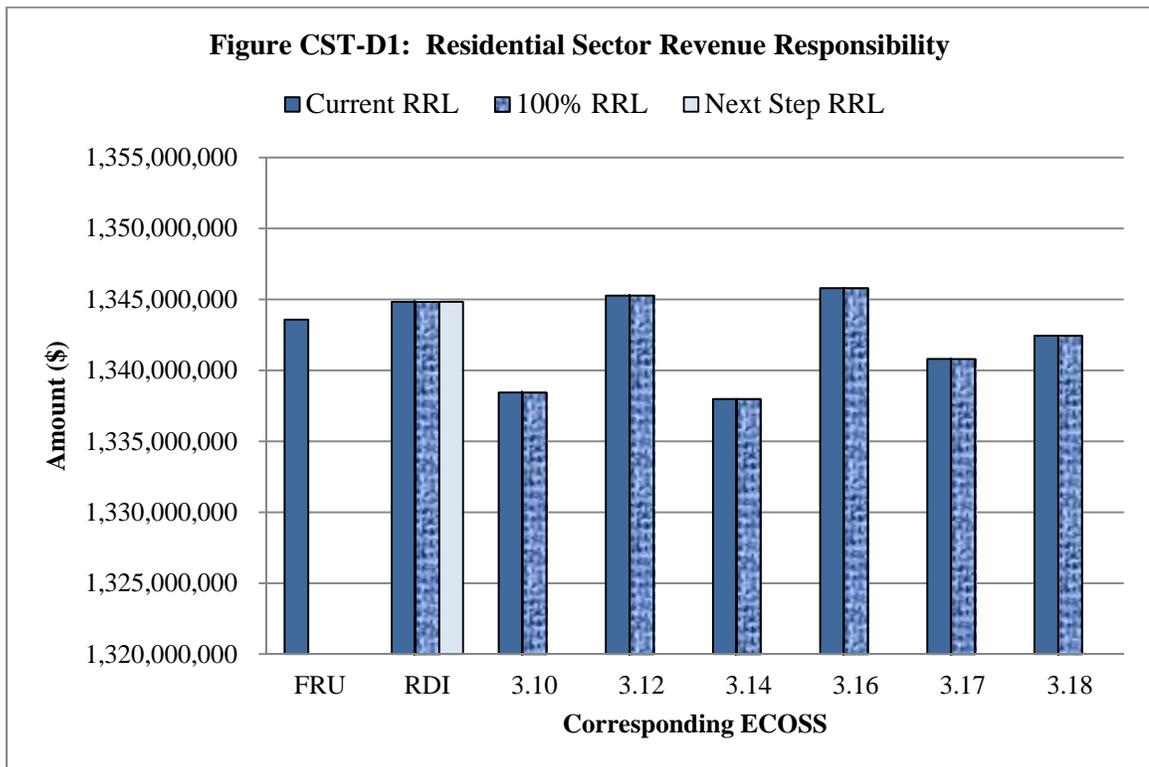
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Table CST-D21: Revenue Responsibilities – RDI and ComEd Ex. 2.19 Illustrative							
Delivery Class	RDI			Cost Inputs from ComEd Ex. 3.18 Revenue Responsibilities Equal 100%			Amount Change from RDI
	Amount	Percent of Cost	Unitized	Amount	Percent	Unitized	
	\$	%	¢/kWh	\$	%	¢/kWh	
Residential							
SHNH	999,356,162	100.0	4.88	997,529,006	100.0	4.87	-0.183%
MFNH	279,990,249	100.0	6.33	279,607,513	100.0	6.32	-0.137%
SFH	17,925,680	100.0	2.39	17,865,368	100.0	2.38	-0.336%
MFH	47,558,164	100.0	2.99	47,437,079	100.0	2.98	-0.255%
Nonresidential							
WH	26,982,199	100.0	5.96	27,042,478	100.0	5.97	0.223%
SL	300,826,824	101.8	2.63	296,511,975	100.0	2.59	-1.434%
ML	181,985,860	101.8	1.75	179,104,493	100.0	1.72	-1.583%
LL	150,918,743	101.8	1.57	148,443,975	100.0	1.54	-1.640%
VLL	256,913,641	101.8	1.42	252,589,498	100.0	1.40	-1.683%
ELL	32,369,926	71.9	0.83	45,108,612	100.0	1.16	39.353%
HV	15,174,728	85.3	0.27	17,786,175	100.0	0.32	17.209%
RR	4,826,225	85.1	0.87	5,668,231	100.0	1.02	17.446%
Lighting							
FIL	14,532,570	100.0	9.15	14,568,237	100.0	9.18	0.245%
DDL	4,072,046	100.0	0.71	4,163,169	99.9	0.73	2.238%
GL	896,983	100.0	1.37	904,191	100.0	1.38	0.804%
Total	2,334,330,000	100.0	2.65	2,334,330,000	100.0	2.65	0.000%
Sector							
Residential	1,344,830,255	100.0	4.94	1,342,438,966	100.0	4.93	-0.178%
Nonresidential	969,998,146	100.0	1.62	972,255,437	100.0	1.62	0.233%
Lighting	19,501,599	100.0	2.46	19,635,597	100.0	2.47	0.687%

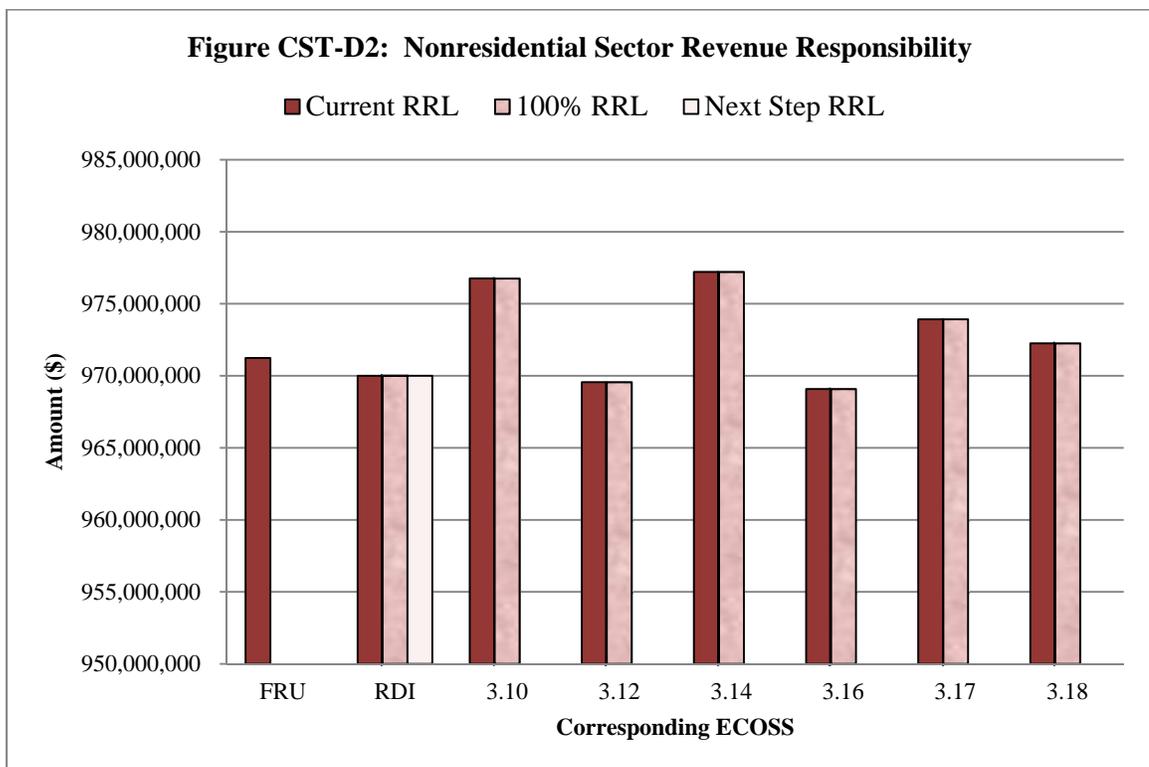
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658 Q. Can the data presented in Tables CST-D3 and CST-D8 through CST-D21 be shown
659 in a more visual manner?

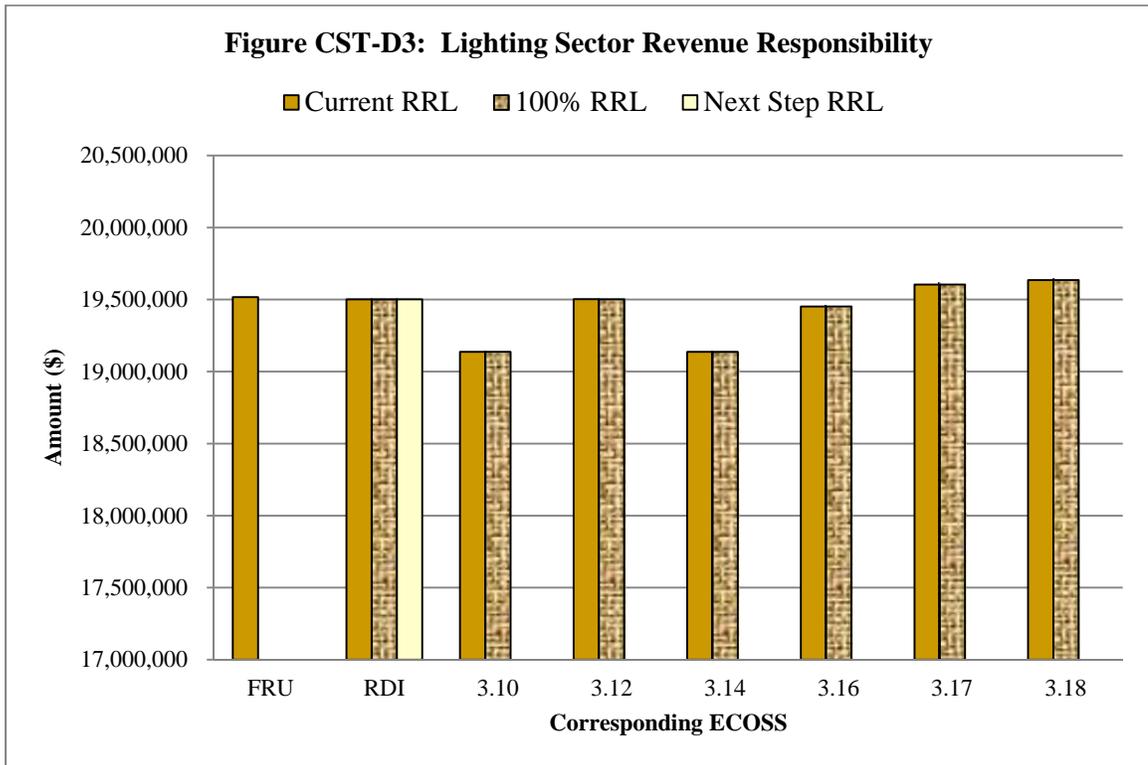
660 A. Yes. The following figures provide more visual depictions of data presented in Tables
661 CST-D3 and CST-D8 through CST-D21.



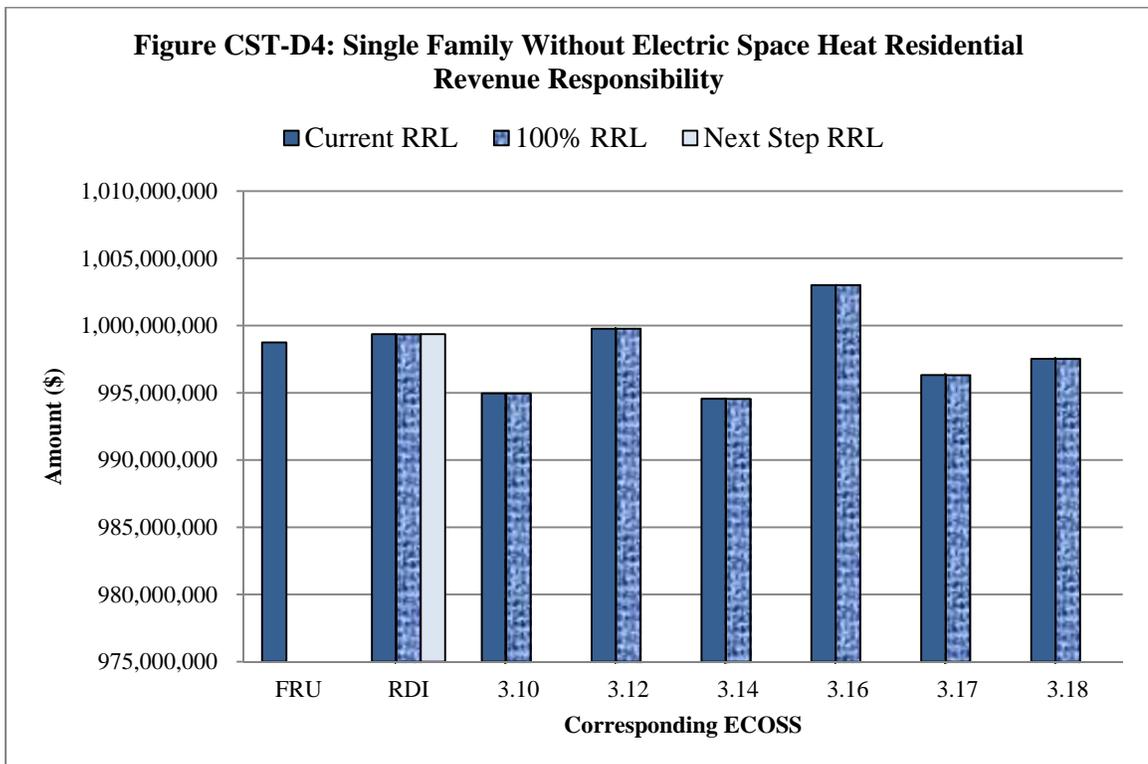
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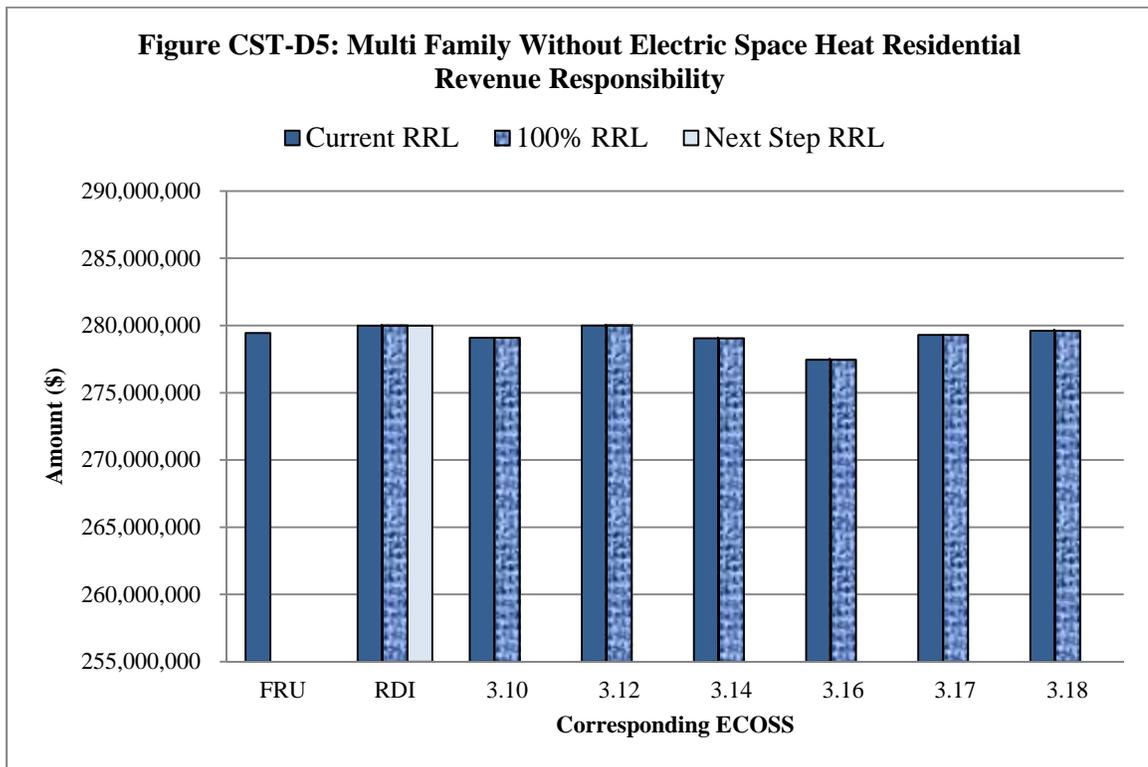
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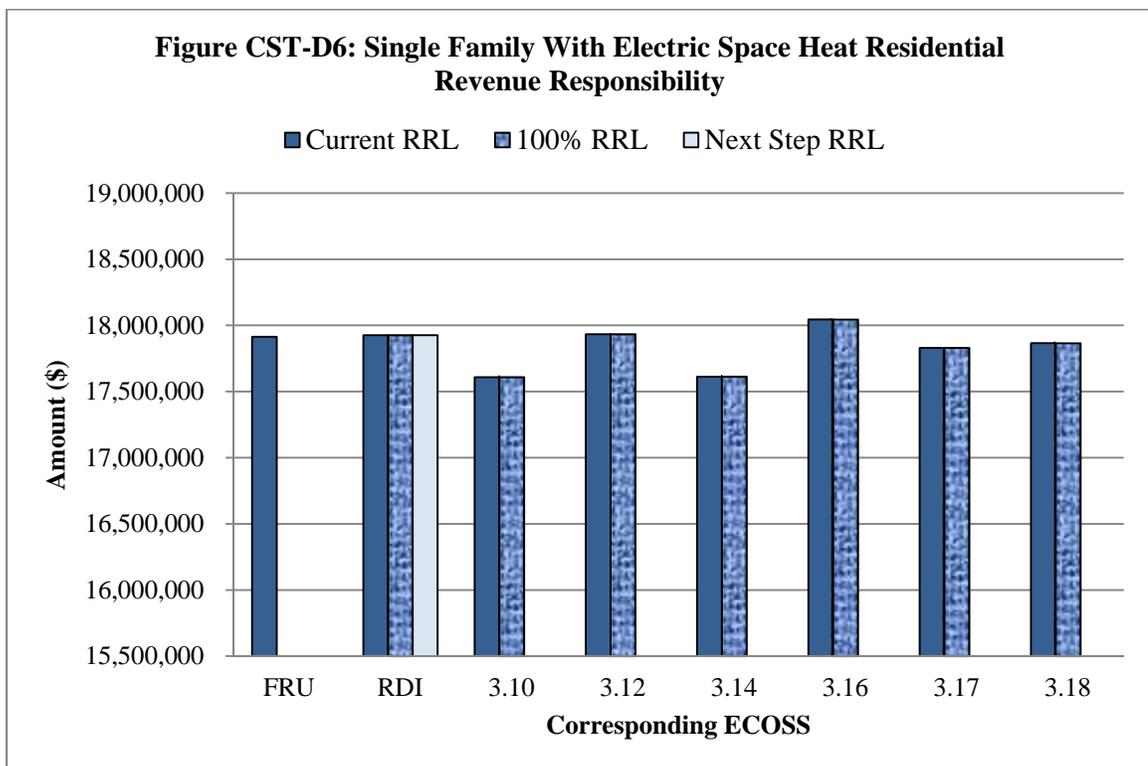
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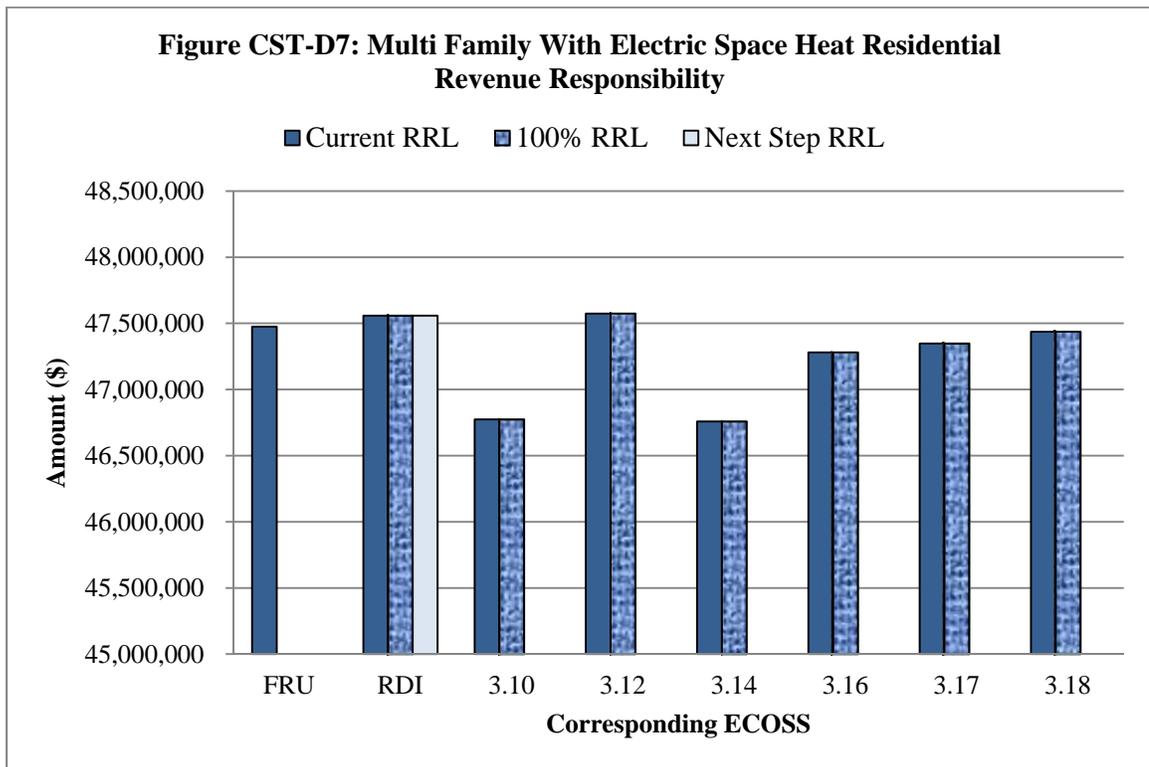
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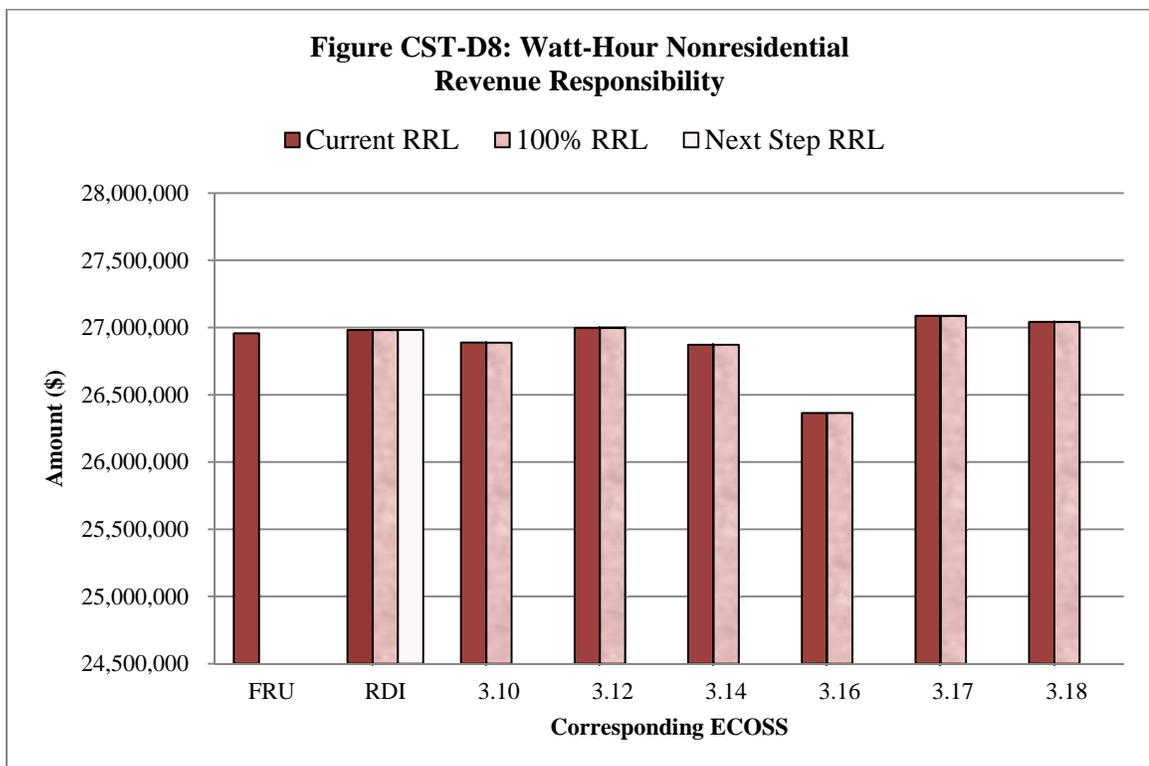
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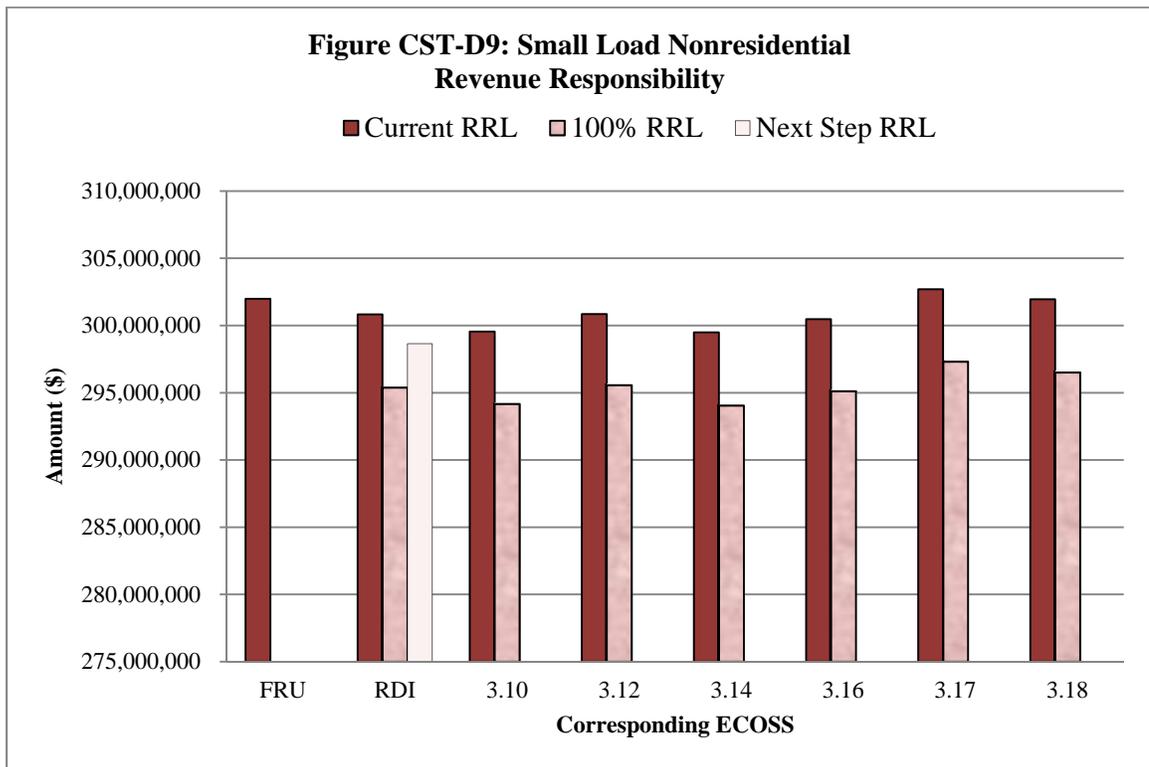
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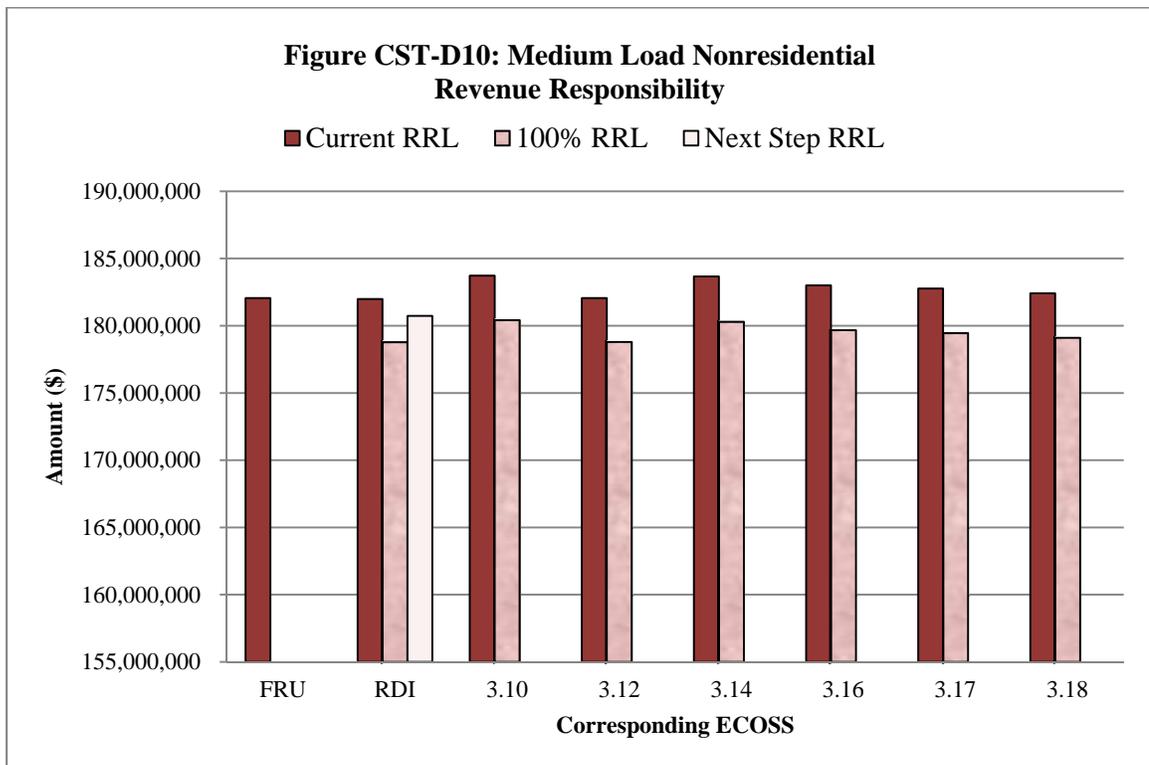
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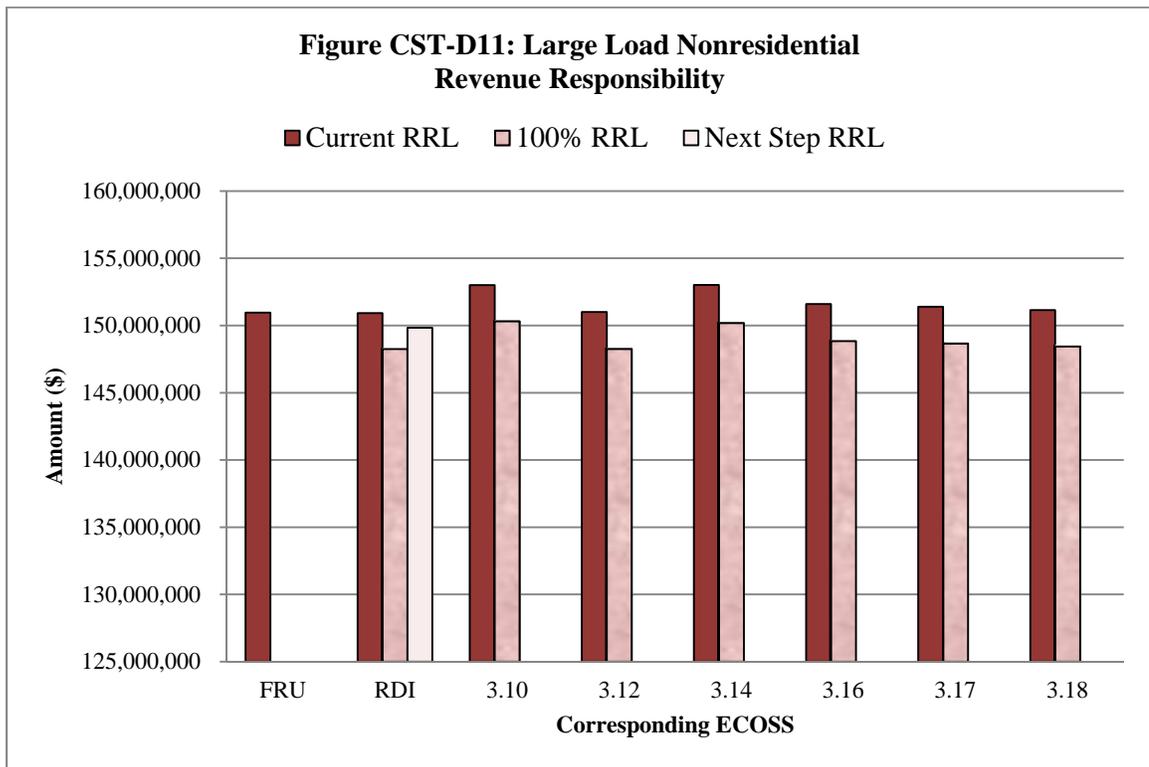
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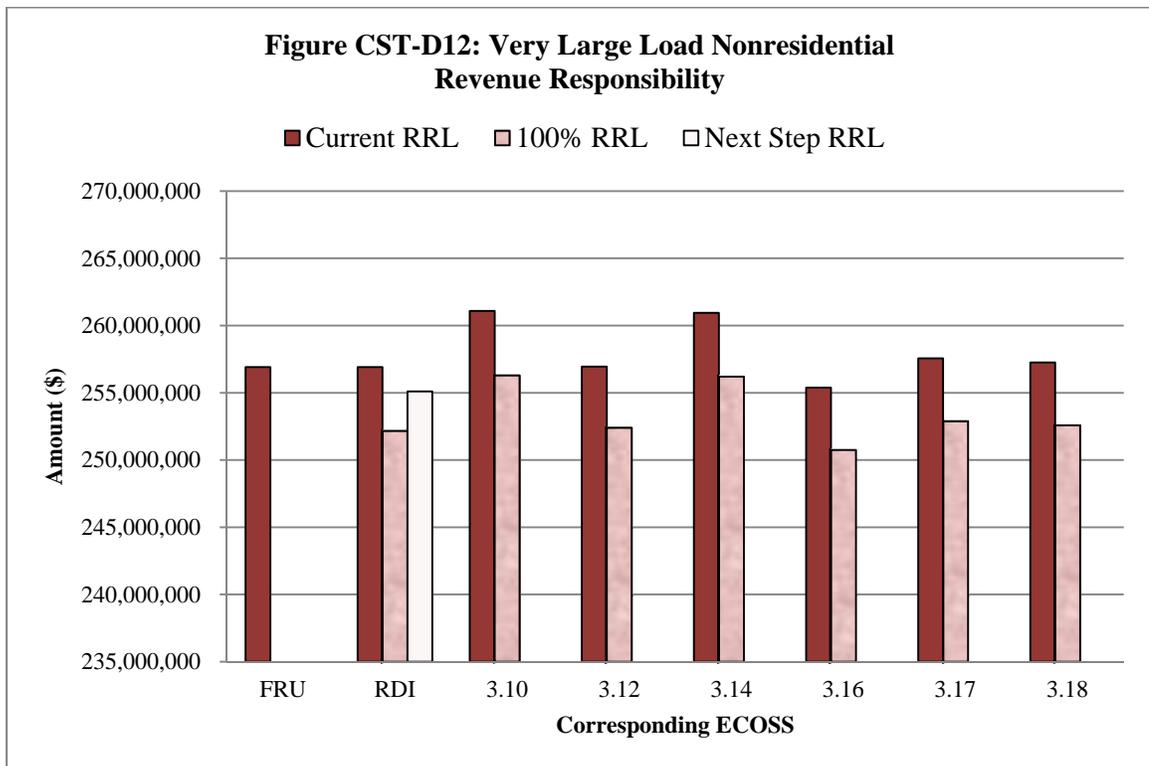
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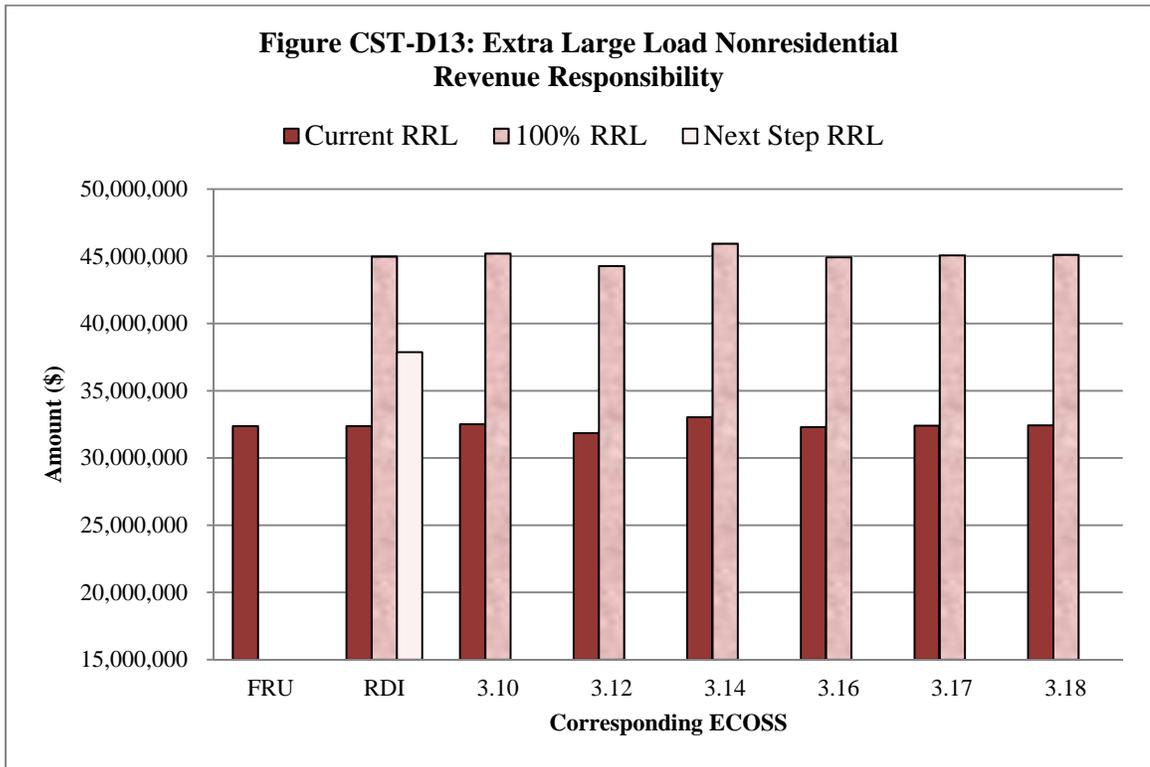
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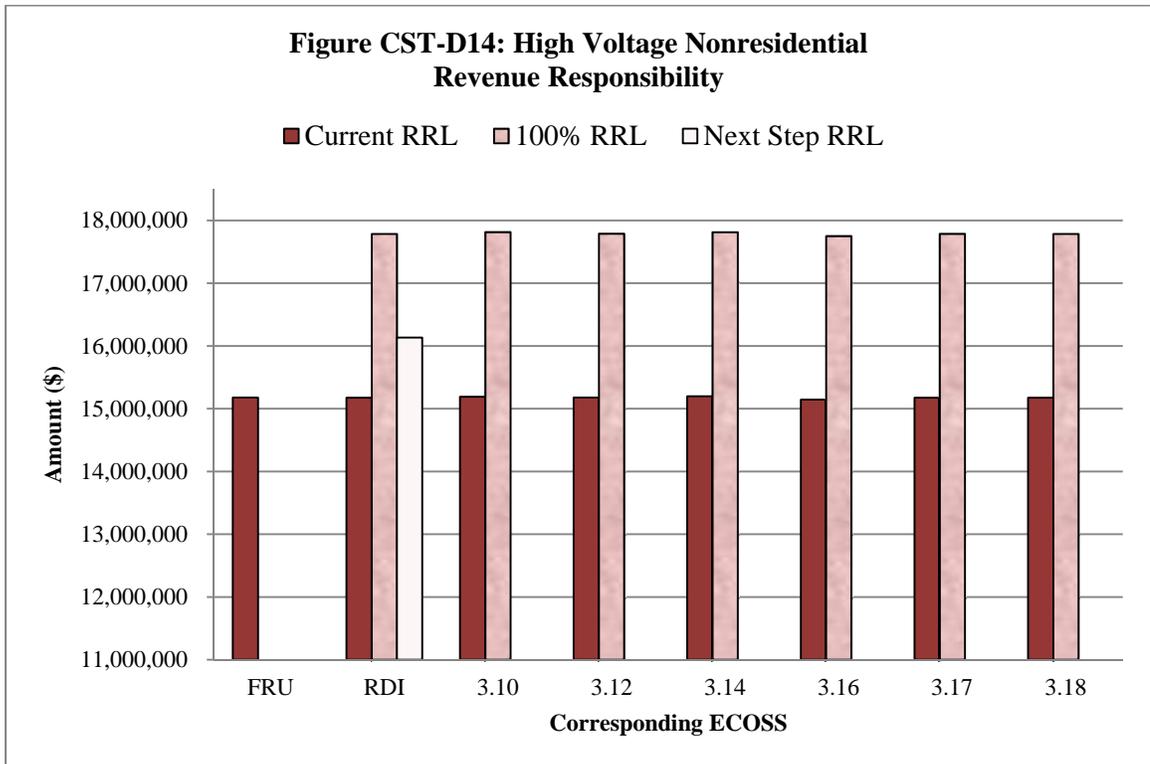
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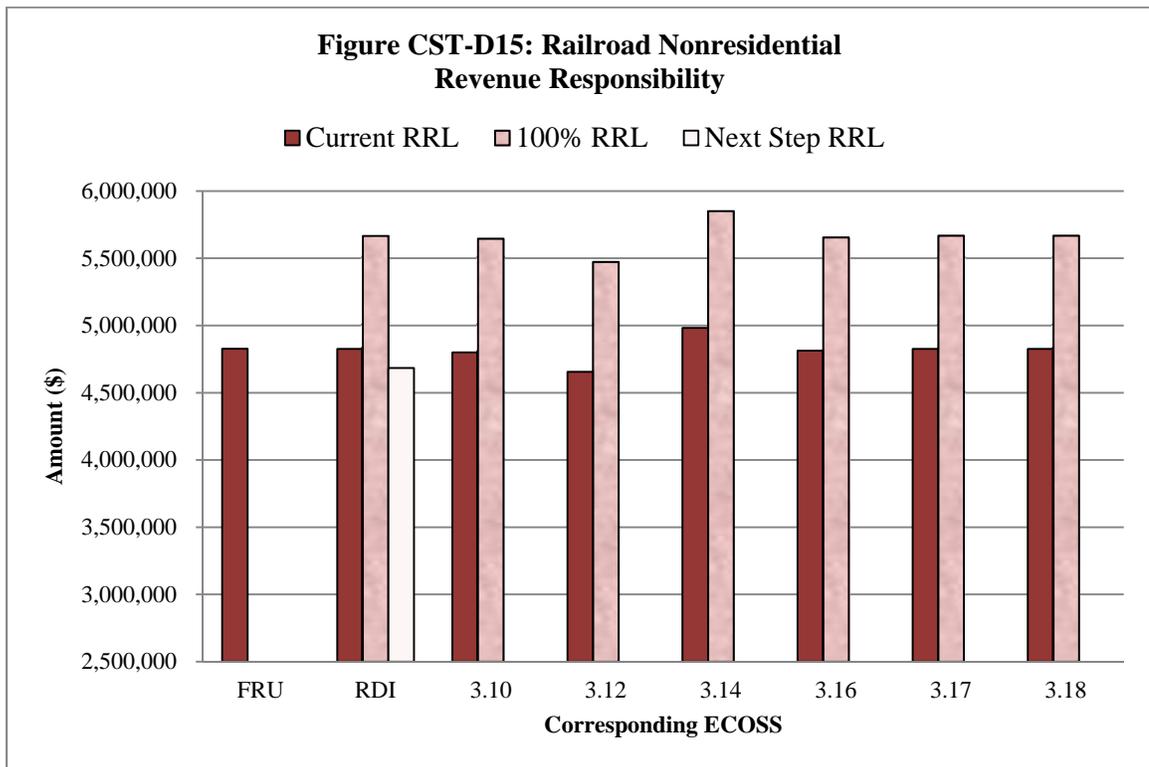
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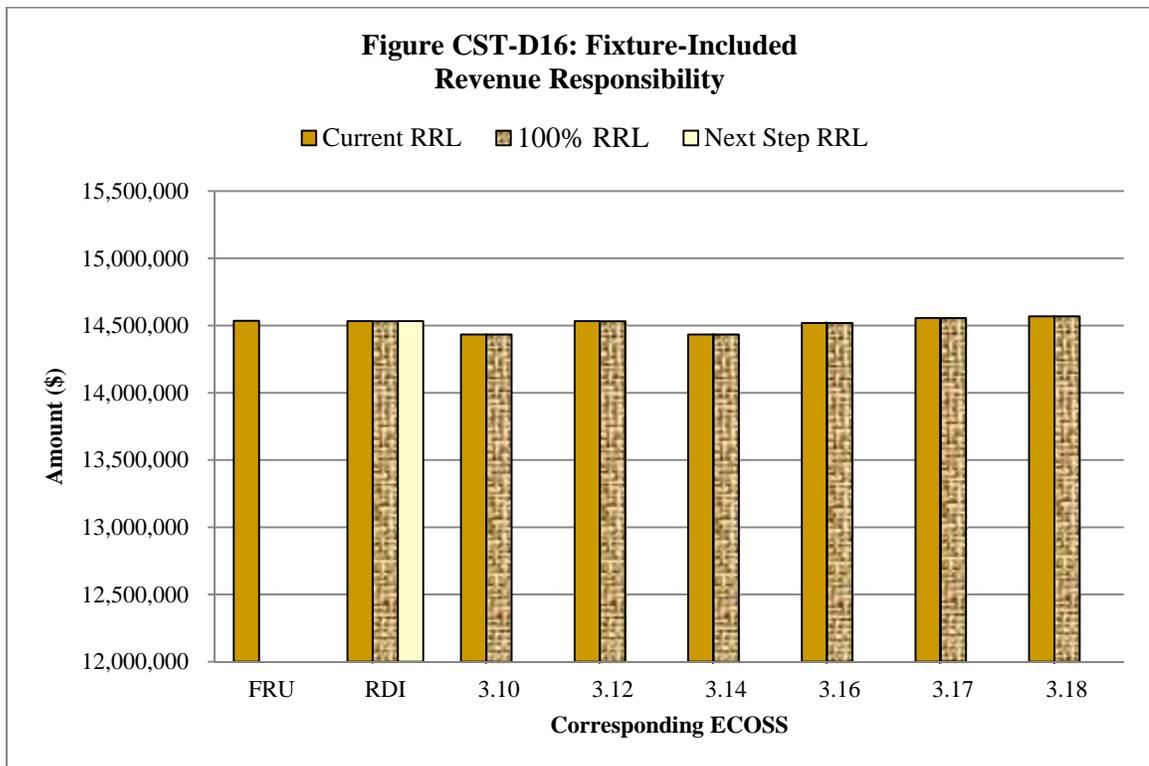
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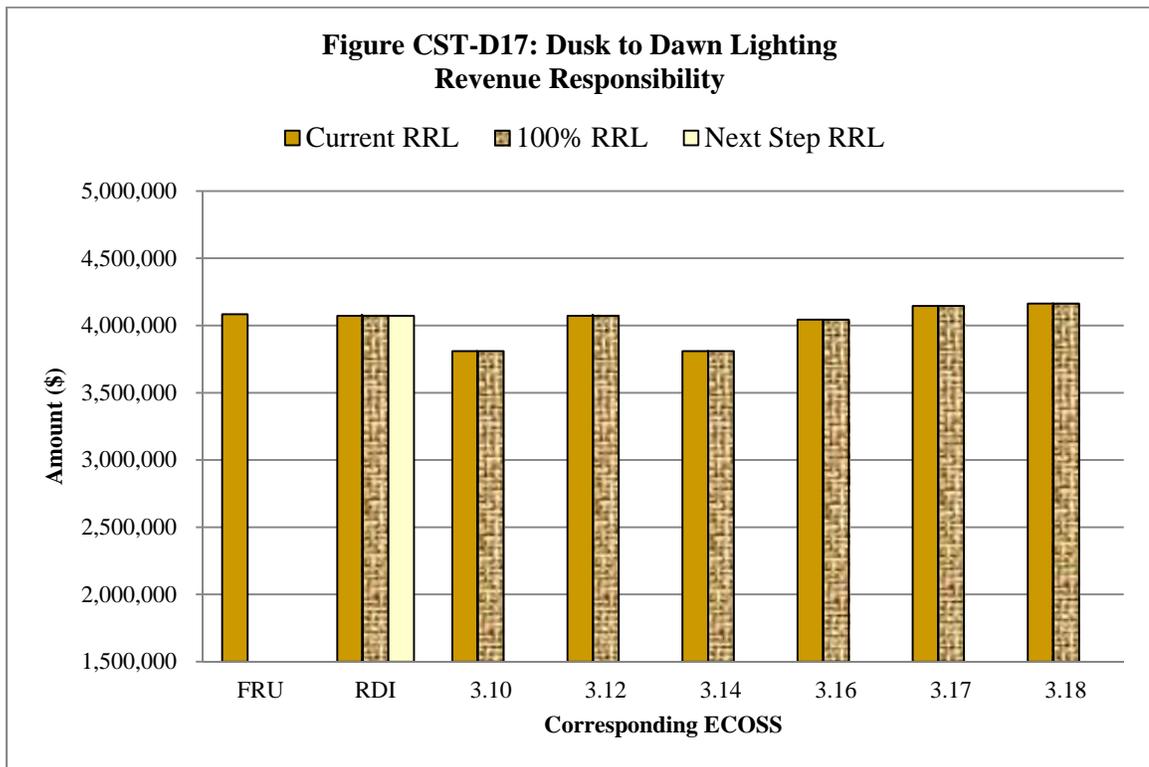
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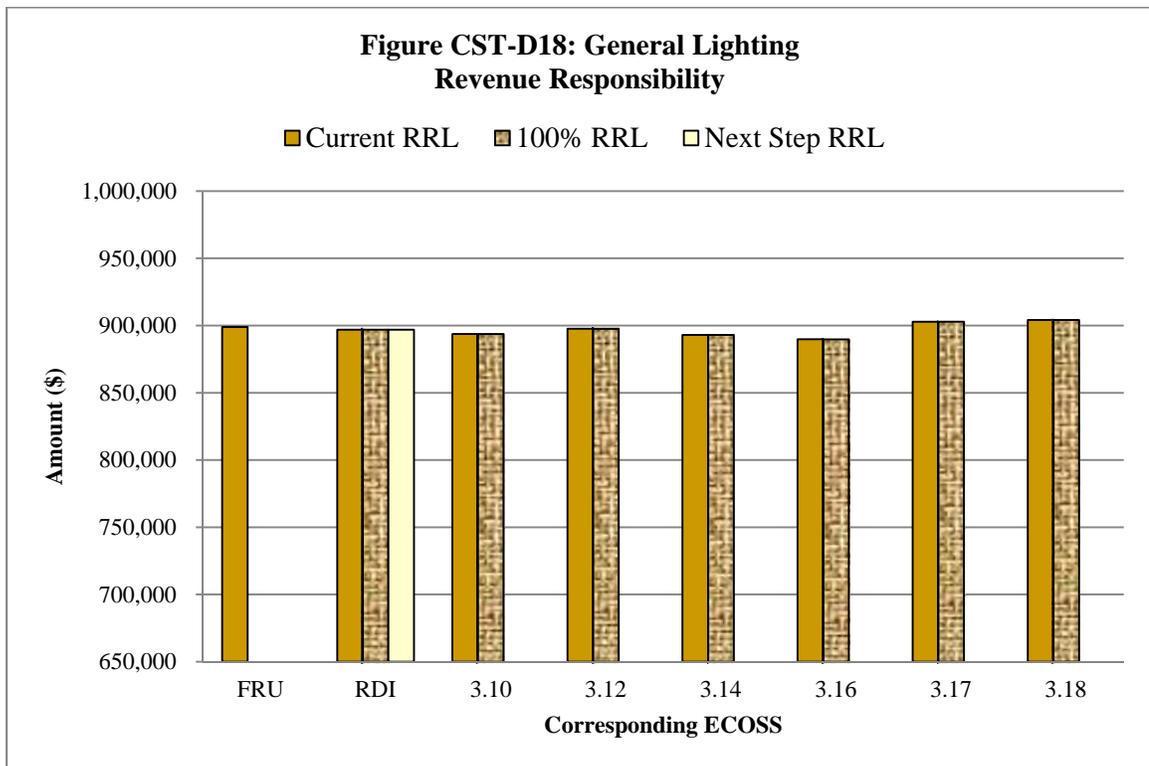
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680 **VIII. ILLUSTRATIVE DELIVERY SERVICE ANNUAL BILLS**

681 **A. Illustrative Residential Annual Bills**

682 1. Average

683 **Q. What are the estimated illustrative residential delivery classes' average annual**
684 **delivery service bills that would result from setting delivery service charges as**
685 **determined in the various illustrative rate designs attached to this direct testimony?**

686 **A.** Table CST-D22: Illustrative Average Residential Estimated Annual Bills summarizes the
687 illustrative estimated class average annual delivery service bills for each residential
688 delivery class that would result if delivery service charges were as determined in the
689 illustrative rate designs presented in ComEd Ex 2.06 through ComEd Ex. 2.19. Also
690 shown is the applicable value reflective of the 2013 FRU Rate Design from Table CST-
691 D4.

Table CST-D22: Illustrative Average Residential Estimated Annual Bills		
Delivery Class	2012 Average Annual kWh Delivered	Illustrative Annual Delivery Service Bill
	kWh	\$
SFNH	9,171	
2013 FRU Rate Design		447.43
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		447.70
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		445.74
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		447.89
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		445.55
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		449.34
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		446.34
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		446.89
MFNH	4,249	
2013 FRU Rate Design		268.29
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		268.82
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		267.96
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		268.83
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		267.92
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		266.39
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		268.16
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		268.45
SFH	21,442	
2013 FRU Rate Design		511.84
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		512.17
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		503.11
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		512.39
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		503.20
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		515.57
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		509.44
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		510.45
MFH	9,997	
2013 FRU Rate Design		297.94
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		298.46
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		293.54
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		298.56
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		293.44
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		296.72
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		297.14
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		297.70

692

693

2. Low Use Residential

694

Q. What are the estimated illustrative annual delivery service bills for residential customers with relatively low electricity use that would result from setting delivery service charges as determined in the various illustrative rate designs attached to this direct testimony?

695

696

697

698 A. Table CST-D23: Illustrative Estimated Annual Bills - Low Use Residential summarizes
 699 the illustrative estimated annual delivery service bills for residential customers with
 700 relatively low electricity usage at the 25th percentile in each residential delivery class that
 701 would result from setting delivery service charges as determined in the various
 702 illustrative rate designs attached to this direct testimony. Also shown is the applicable
 703 value reflective of the 2013 FRU Rate Design from Table CST-D5.

Table CST-D23: Illustrative Estimated Annual Bills – Low Use Residential		
Delivery Class	2012 Annual kWh Delivered	Illustrative Annual Delivery Service Bill
	kWh	\$
SFNH	6,095	
2013 FRU Rate Design		370.65
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		370.83
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		369.20
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		370.96
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		369.08
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		372.16
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		369.69
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		370.17
MFNH	2,517	
2013 FRU Rate Design		212.59
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		213.05
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		212.34
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		213.00
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		212.27
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		211.12
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		212.51
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		212.73
SFH	12,490	
2013 FRU Rate Design		399.85
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		400.10
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		392.91
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		400.22
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		392.92
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		402.78
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		397.91
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		398.64
MFH	5,540	
2013 FRU Rate Design		228.99
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		229.33
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		225.48
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		229.38
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		225.42
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		227.99
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		228.28
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		228.75

704

705 3. High Use Residential

706 **Q. What are the estimated illustrative annual delivery service bills for residential**
707 **customers with relatively high electricity use that would result from setting delivery**
708 **service charges as determined in the various illustrative rate designs attached to this**
709 **direct testimony?**

710 **A. Table CST-D24: Illustrative Estimated Annual Bills - High Use Residential summarizes**
711 **the illustrative estimated annual delivery service bills for residential customers with**
712 **relatively high electricity usage at the 75th percentile in each residential delivery class**
713 **that would result from setting delivery service charges as determined in the various**
714 **illustrative rate designs attached to this direct testimony. Also shown is the applicable**
715 **value reflective of the 2013 FRU Rate Design from Table CST-D6.**

Table CST-D24: Illustrative Estimated Annual Bills – High Use Residential		
Delivery Class	2012 Annual kWh Delivered	Illustrative Annual Delivery Service Bill
	kWh	\$
SFNH	12,286	
2013 FRU Rate Design		525.18
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		525.55
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		523.23
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		525.79
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		522.99
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		527.49
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		523.97
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		524.57
MFNH	5,876	
2013 FRU Rate Design		320.62
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		321.21
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		320.20
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		321.27
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		320.20
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		318.31
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		320.44
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		320.79
SFH	24,589	
2013 FRU Rate Design		551.21
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		551.57
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		541.85
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		551.82
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		541.97
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		555.22
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		548.66
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		549.75
MFH	11,939	
2013 FRU Rate Design		327.98
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		328.57
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		323.19
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		328.69
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		323.07
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		326.66
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		327.14
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		327.74

716

717 **B. Illustrative Nonresidential Annual Bills**

718 **Q. What are the estimated illustrative nonresidential delivery classes’ average annual**
 719 **delivery service bills that would result from setting delivery service charges as**
 720 **determined in the various illustrative rate designs attached to this direct testimony?**

721 **A. Table CST-D25: Illustrative Average Nonresidential Estimated Annual Bills summarizes**
 722 **the illustrative estimated class average annual bills for the WH and SL nonresidential**

723 delivery classes that would result from setting delivery service charges as determined in
724 the various illustrative rate designs attached to this direct testimony. Also shown are the
725 applicable values reflective of the 2013 FRU Rate Design from Table CST-D7.

Table CST-D25: Illustrative Average Nonresidential Estimated Annual Bills		
Delivery Class	2012 Average Annual kWh Delivered	Illustrative Annual Delivery Service Bill
	kWh	\$
WH	4,929	
2013 FRU Rate Design		293.26
RDI / Illustrative Rate Designs ComEd Exs. 2.04, 2.06, 2.07		293.53
Illustrative Rate Designs ComEd Exs. 2.08, 2.09		292.50
Illustrative Rate Designs ComEd Exs. 2.10, 2.11		293.70
Illustrative Rate Designs ComEd Exs. 2.12, 2.13		292.34
Illustrative Rate Designs ComEd Exs. 2.14, 2.15		286.82
Illustrative Rate Designs ComEd Exs. 2.16, 2.17		294.67
Illustrative Rate Designs ComEd Exs. 2.18, 2.19		294.18
SL	46,069	
2013 FRU Rate Design		1,216.44
RDI Rate Design ComEd Ex. 2.04		1,211.76
Illustrative Rate Design ComEd Ex. 2.06		1,189.83
Illustrative Rate Design ComEd Ex. 2.07		1,203.02
Illustrative Rate Design ComEd Ex. 2.08		1,206.63
Illustrative Rate Design ComEd Ex. 2.09		1,184.94
Illustrative Rate Design ComEd Ex. 2.10		1,211.88
Illustrative Rate Design ComEd Ex. 2.11		1,190.55
Illustrative Rate Design ComEd Ex. 2.12		1,206.38
Illustrative Rate Design ComEd Ex. 2.13		1,184.46
Illustrative Rate Design ComEd Ex. 2.14		1,210.32
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Illustrative Rate Design ComEd Ex. 2.16		1,219.31
Illustrative Rate Design ComEd Ex. 2.17		1,197.61
Illustrative Rate Design ComEd Ex. 2.18		1,216.31
Illustrative Rate Design ComEd Ex. 2.19		1,194.38

726
727 Again, due to the widely varying nature of customers within the other delivery classes in
728 the nonresidential sector, there is little value in estimating average annual bills that do not
729 reflect any typical customers.

730 C. **Illustrative Lighting Annual Bills**

731 Q. **Did ComEd estimate illustrative lighting delivery class average annual delivery**
732 **service bills that would result from setting delivery service charges as determined in**
733 **the various illustrative rate designs attached to this direct testimony?**

734 A. No. As I previously mentioned, due to the widely varying nature of customers within the
735 lighting sector there is little value in estimating average annual bills that do not reflect
736 any typical customers.

737 **IX. OTHER RATE DESIGN TOPICS**

738 **A. Other Proposed Tariff Revisions**

739 1. Distribution Loss Factors

740 Q. **Is ComEd proposing any revisions to the distribution loss factors (“DLFs”) listed in**
741 **Rate RDS?**

742 A. Yes. ComEd is proposing to update the DLFs in accordance with the 2012 FR Update
743 Case Order.

744 Q. **What are DLFs?**

745 A. DLFs are factors determined for each delivery class to account for losses on ComEd’s
746 distribution system associated with the delivery of electric power and energy to
747 customers in the delivery class. DLFs are used to determine the amount of electricity that
748 must be procured for a retail customer in accordance with the formula provided in Rate
749 RDS.

750 Q. **How were the updated DLFs determined?**

751 A. The updated DLFs were determined from the results of the Distribution System Loss
 752 Study, ComEd Ex. 4.01, attached to ComEd Ex. 4.0, the direct testimony of Mr. Michael
 753 F. Born, P.E. The DLF for each class or subclass was calculated by dividing the relevant
 754 annual class or subclass usage including distribution losses by the corresponding annual
 755 class usage without distribution losses and then subtracting 1. In addition, an updated
 756 system average DLF was determined to be reflected in certain charges applicable to
 757 customers taking service with hourly energy pricing. The updated DLFs are presented in
 758 Table CST-D26: Updated DLFs.

Table CST-D26: Updated DLFs	
Delivery Class	Updated DLF
SFNH	0.0721
MFNH	0.0759
SFH	0.0854
MFH	0.0754
WH	0.0793
SL	0.0690
ML	0.0714
LL	0.0640
VLL	0.0615
ELL	0.0553
HV – metered at or above 138 kV	0.0043
HV – otherwise over 10,000 kW	0.0101
HV – all other	0.0102
RR	0.0318
FIL	0.1023
DDL	0.1023
GL	0.0883
System Average	0.0644

759

2. Metering Facilities Charges and Adjustments

760
 761 **Q. Is ComEd proposing any revisions to charges and adjustments pertaining to**
 762 **metering facilities?**

763 A. Yes. ComEd is proposing to update the Standard Meter Allowances (“SMAs”) and the
 764 Monthly Rental Charges (“MRCs”) provided in Rider ML – Meter-Related Facilities

765 Lease (“Rider ML”). ComEd is also introducing new MRCs for meters that operate
766 within the developing smart grid infrastructure.

767 **Q. Why is ComEd introducing MRCs for meters that operate within the developing**
768 **smart grid infrastructure?**

769 A. During the implementation of the narrowly defined and geographically limited advanced
770 metering infrastructure (“AMI”) pilot approved by the Commission in Docket No. 09-
771 0263, ComEd applied meter rental charges based upon the metering facilities that would
772 have been installed if the AMI pilot had not been implemented. ComEd is now
773 proposing to have its MRCs reflect, as applicable, the actual metering facilities in place
774 and in operation at customer premises because ComEd is beginning the process of a
775 system-wide deployment of smart metering facilities to operate within the smart grid
776 infrastructure.

777 **Q. How were the proposed SMAs determined?**

778 A. ComEd Ex. 2.20 shows the determination of the proposed SMAs. The proposed SMAs
779 were computed using the methodology most recently approved by the Commission in the
780 2010 Rate Case.

781 **Q. How were the proposed MRCs for Rider ML determined?**

782 A. The proposed MRCs were determined using the methodology most recently approved by
783 the Commission in the 2010 Rate Case. An example of the determination of an MRC is
784 provided in ComEd Ex. 2.21 along with the proposed MRCs and newly proposed MRCs
785 for all the meter-related facilities. There are confidential and public versions of this
786 exhibit.

787 Q. **How would these proposed revisions affect ComEd’s meter lease billings?**

788 A. Currently, ComEd is billing approximately \$1.22 million per month in meter lease
789 charges. With the proposed SMAs and MRCs, meter lease billing is estimated to be
790 \$1.36 million per month. The impact of the proposed revisions pertaining to meter
791 facilities, if they are approved by the ICC, will be reflected in the determination of future
792 Rate Year Net Revenue Requirements for delivery service that are updated each year in
793 accordance with the annual update provisions in Rate DSPP and Section 16-108.5 of the
794 Act.

795 3. Light Emitting Diode Lighting Units

796 Q. **What is ComEd’s proposal concerning lighting units?**

797 A. ComEd is proposing to offer two LED lighting units for the FIL Delivery Class. One of
798 the new lighting units is typically used for municipal street lighting purposes, while the
799 other lighting unit is generally used for private outdoor lighting purposes. Because these
800 lighting units provide comparable light output to their mercury vapor (“MV”)
801 counterparts, but at lower electricity consumption levels, ComEd believes that these units
802 offer customers an energy efficient alternative.

803 Q. **Why is ComEd proposing to offer LED lighting units at this time?**

804 A. ComEd considered offering LED lighting units in the past, but the costs of the units were
805 prohibitive. Recently, though, the costs of the units have dropped significantly, and the
806 technology is becoming available from multiple vendors. In addition, replacement
807 ballasts for MV lighting units are no longer available. As a result, when a MV ballast
808 fails the lighting unit is currently replaced with a high pressure sodium (“HPS”) lighting

809 unit. Customers, however, are generally not satisfied with the HPS replacement due to
810 the coloring of its light, which is yellow when compared to the white coloration of MV
811 and LED light. In summary, ComEd is proposing to offer LED lighting units to
812 customers in the FIL Delivery Class in response to cost and availability considerations, as
813 well as customer preferences and energy efficiency.

814 **Q. Has ComEd tested any LED lighting units?**

815 A. Yes. Over the past six months, ComEd replaced fifteen 175 Watt MV lighting units with
816 LED lighting units at three different locations in an effort to observe light levels and
817 gauge responses from municipality personnel of municipalities in which the replacements
818 were made. The LED lighting units were provided by five different vendors and had
819 electric requirements ranging from 50 Watts to 70 Watts.

820 **Q. Did ComEd reach any conclusions pertaining to its tests of LED lighting units?**

821 A. Yes. Based upon (a) the acceptable amounts of light observed on affected street surfaces,
822 (b) positive responses from affected municipality personnel, and (c) an absence of
823 concerns from ComEd crews with respect to the installation of the LED lighting units,
824 ComEd concluded that it would be in the best interests of both ComEd and its customers
825 to offer LED lighting units to customers in the FIL Delivery Class.

826 **Q. Why is each proposed LED lighting unit offering listed with a range of wattages
827 rather than a specific wattage level?**

828 A. The wattage of an LED lighting unit depends upon the number of individual LED bulbs
829 placed in the fixture. ComEd found that there is no industry standard and that different
830 vendors offer LED lighting units with different numbers of bulbs and wattages.

831 Consequently, in order to avoid being limited to a single vendor or place a specific
832 wattage requirement on the manufacturing processes of its vendors, ComEd is planning
833 to purchase LED lighting units with wattages that are within a range of available
834 wattages. With respect to the two specific LED lighting unit types ComEd is proposing
835 to offer, LED lighting units with the 50 Watt to 60 Watt range provide light comparable
836 to the 175 Watt MV fixture.

837 **Q. How will ComEd determine the amount of electricity it delivers to the LED lighting**
838 **units if the LED lighting units are listed with a range of wattages?**

839 A. The kWh delivered by ComEd for lighting to customers in the FIL Delivery Class will be
840 determined based upon the actual wattage of the LED lighting units installed.

841 **Q. Why is ComEd proposing to offer only two LED lighting units?**

842 A. ComEd is proposing to limit its offering of LED lighting units in order to study customer
843 reaction to the LED lighting units and ascertain if more extensive offerings are warranted
844 in the future. Also, while the costs of the units have declined, the technology is
845 continuing to develop. With respect to the specific LED lighting units that ComEd is
846 proposing to offer, as previously noted, LED lighting units with the 50 Watt to 60 Watt
847 range provided light comparable to the 175 Watt MV fixture, which is currently the most
848 popular fixture available to the FIL Delivery Class with approximately 50,000 units
849 installed in the system today. As the ballasts on the most popular MV units fail over
850 time, there will be comparable white light LED lighting units available to replace the MV
851 units.

852 Q. **Did ComEd consider the fact that LED bulbs generally last longer than their MV**
853 **and HPS counterparts?**

854 A. Yes. ComEd modified its fixture-included lighting allocation factor work paper to
855 recognize that LED lighting units are expected to require less maintenance when
856 compared to MV and HPS fixtures. As previously addressed in this direct testimony, the
857 updated allocation factors developed in this work paper are used as inputs to the rate
858 design model used to develop the RDI Rate Design presented in ComEd Ex. 2.04, as well
859 the various illustrative rate designs presented in ComEd Ex. 2.06 through ComEd
860 Ex. 2.19.

861 4. Other Miscellaneous Charges and Adjustments

862 Q. **Is ComEd proposing to update other miscellaneous charges and adjustments**
863 **contained in its Schedule of Rates?**

864 A. Yes. ComEd is proposing to update a number of other miscellaneous charges and
865 adjustments that are listed in various tariffs in its Schedule of Rates. These other
866 miscellaneous charges and adjustments were last updated in the 2010 Rate Case. They
867 were not updated in either the 2011 FR Case or the 2012 FR Update Case because they
868 are not standard delivery service charges designed to provide for the recovery of the Rate
869 Year Net Revenue Requirement. Table CST-D27: Other Miscellaneous Charges and
870 Adjustments lists the currently effective value, as well as the proposed value, for the
871 subject miscellaneous charges and adjustments. Each of the proposed values was
872 computed using the methodology most recently approved by the Commission, and for
873 each such value an exhibit is attached to this direct testimony showing how the value is
874 computed. For each proposed value, the applicable exhibit is listed in Table CST-D27.

875 Also listed in Table CST-D27 is the specific tariff in which the value is presented in the
876 Schedule of Rates.

Table CST-D27: Other Miscellaneous Charges and Adjustments				
Name	Current Value	Proposed Value	Tariff	Documentation
Split Load DASR (by meter)	\$142.00/DASR	\$207.00/DASR	Rate RDS	ComEd Ex. 2.22
Split Load DASR (by percent or first through meter)	\$86.00/DASR	\$117.00/DASR	Rate RDS	ComEd Ex. 2.22
Nonstandard Switching Fee (per visit)	\$33.99/read first meter \$4.72/read each additional meter	\$43.04/read first meter \$5.69/read each additional meter	Rate RDS	ComEd Ex. 2.23
Off-Cycle Termination Fee	\$497.00	\$570.00	Rate BESH	ComEd Ex. 2.24
MSP Meter Reading Charges (per visit)	\$33.99/read first meter \$4.72/read each additional meter \$4.72/each special exchange	\$43.04/read first meter \$5.69/read each additional meter \$5.69/each special exchange	Rate MSPS	ComEd Ex. 2.25
Meter Equipment Removal Charges (per visit)			Rate MSPS	ComEd Ex. 2.25
Single Phase	\$108.75/first meter \$46.25/each additional meter	\$88.24/first meter \$37.53/each additional meter		
Three Phase and Transformer-Rated at or under 500 v	\$138.86/first meter \$67.28/each additional meter	\$112.17/first meter \$54.35/each additional meter		
Transformer-Rated over 500 v	\$147.74/first meter \$72.36/each additional meter	\$119.18/first meter \$58.38/each additional meter		
Current Transformers	\$140.29/first set \$68.71/each additional set	\$113.33/first set \$55.51/each additional set		
Current and Potential Transformers	\$220.10/first set \$144.72/each additional set	\$177.56/first set \$116.75/each additional set		
Cellular Telephones	\$140.29/first phone \$68.71/each additional phone	\$113.33/first phone \$55.51/each additional phone		
MSP-Requested Work			Rate MSPS	ComEd Ex. 2.25
Single Phase	\$125.00/hour	\$101.42/hour		
Three Phase and Transformer-Rated at or under 500 v	\$143.15/hour	\$115.64/hour		
Transformer- Rated over 500 v	\$150.75/hour	\$121.62/hour		
CATV Power Supply Test Fee	\$156.50	\$255.00	GTC	ComEd Ex. 2.26
Duplicate Information Fee	\$9.00	\$11.87	GTC	ComEd Ex. 2.27
Interval Data Fee	\$3.45	\$1.18	GTC	ComEd Ex. 2.28
Invalid Payment Fee	\$21.00	\$34.10	GTC	ComEd Ex. 2.29
Reconnection Fee	\$56.50	\$63.43	GTC	ComEd Ex. 2.30

878 Q. **What tariff sheets need to be revised to update these other miscellaneous charges**
879 **and adjustments?**

880 A. There are a number of tariff sheets that need to be revised in order to reflect the updates
881 in the various other miscellaneous charges and adjustments presented in this direct
882 testimony. ComEd filed those proposed sheets on April 30, 2013. Redline versions of
883 those tariff sheets are attached to this direct testimony in ComEd Ex. 2.31.

884 Q. **Why isn't ComEd proposing to update the charges related to the Residential Real**
885 **Time Pricing ("RRTP") Program in Rider RCA – Retail Customer Assessments**
886 **("Rider RCA")?**

887 A. The charges related to the RRTP Program in Rider RCA are expected to be revisited prior
888 to the expiration of the Program Administrator's contract in 2015. At this time, ComEd
889 believes it is best to address those charges in conjunction with the expiration of that
890 contract. However, if the circumstances pertaining to those charges change, ComEd
891 reserves the right to propose updates to those charges in the future, as applicable.

892 Q. **Why isn't ComEd proposing to update the charges listed in Rate GAP –**
893 **Government Aggregation Protocols ("Rate GAP")?**

894 A. The charges listed in Rate GAP have been a subject under consideration in Docket No.
895 12-0590. At this time, ComEd believes it is best to address those charges in that
896 proceeding. However, if the circumstances pertaining to those charges change, ComEd
897 reserves the right to propose updates to those charges in the future, as applicable.

898 Q. **Why isn't ComEd proposing to update the values used to determine the Discounted**
899 **Uncollectible Receivables determined in accordance with the provisions in Rider**
900 **POU – Purchase of Uncollectibles (“Rider POU”)?**

901 A. The values used to determine the Discounted Uncollectible Receivables determined in
902 accordance with the provisions in Rider POU are updated annually in accordance with
903 the provisions of Rider POU.

904 5. Other Tariff Revisions

905 Q. **Is ComEd proposing any other revisions to its tariffs?**

906 A. Yes, as previously noted, ComEd is proposing to offer LED lighting units to customers in
907 the FIL Delivery Class which requires revisions to its GTC and two of the informational
908 sheets that list the delivery service charges. ComEd is also proposing to remove certain
909 values currently listed in tariff sheets and instead provide them in informational sheets.
910 Specifically, ComEd is proposing to remove the listing of the SBO credit from Rate RDS
911 and Rider SBO, and instead list it in an informational sheet. In addition, ComEd is
912 proposing to remove the listing of the DLFs from Rate RDS, and instead list them in an
913 informational sheet. ComEd is proposing to list the SBO credit and the DLFs in
914 informational sheets in an effort to reflect the informational filing nature of the
915 compliance filings for the annual formula rate update cases and to streamline those
916 filings, which have a two business day turnaround constraint. In addition, listing these
917 values in informational sheets in the section of ComEd's Schedule of Rates that has other
918 informational sheets with listings of various charges and values will make it easier for
919 customers and interested parties to locate the SBO credit and DLF values. All the
920 proposed tariff revisions were filed by ComEd on April 30, 2013. Redline versions of the

921 tariff revisions are attached to this direct testimony in ComEd Ex. 2.31. The exemplar
922 informational sheet that would list the SBO credit, the exemplar informational sheet that
923 would list the DLFs, and the exemplar informational sheets that would list the charges for
924 the proposed LED lighting units are presented in ComEd Ex. 2.32.

925 **B. Other Rate Design Topics for Possible Commission Consideration**

926 **Q. Has the Commission identified any additional rate design topics that could be**
927 **considered in this proceeding?**

928 **A.** Yes. A rate design topic of particular note was addressed in the Docket No. 11-0498
929 Order, which pertains to the mechanism now in place to phase out subsidies provided to
930 certain residential customers taking service under Rate BES – Basic Electric Service
931 (“Rate BES”) that are related to electricity supply charges determined in accordance with
932 Rider PE – Purchased Electricity (“Rider PE”). In that proceeding, the Commission
933 explicitly maintained subsidies for certain nonresidential and lighting customers taking
934 service under Rate BES as noted in the Docket No. 11-0498 Order at pages 6-7:

935 “Concerning the proper allocation of costs amongst rate BES customers in
936 general, it should be noted at the outset that a rate subsidy will remain
937 with respect to dusk-to-dawn customers. Mr. Alongi testified that dusk-to-
938 dawn customers served on rate BES are smaller municipalities. (Tr. 36-
939 37). There are no small municipalities being represented in this docket.
940 Therefore, this docket does not address that subsidy. Additionally, the
941 non-residential customers that are currently subsidizing the cost of
942 residential space heat customers are watt-hour customers without electric
943 heat and demand customers without electric heat. (Tr. 35-36). These
944 customers also are not represented in this docket.”

945 While ComEd is making no proposal with respect to eliminating the remaining electric
946 supply charge-related subsidies applied in accordance with the provisions of Rate BES
947 and Rider PE, the customer groups that were not represented in Docket No. 11-0498 will

948 have an opportunity to participate if those supply related subsidies are addressed in this
949 proceeding.

950 **Q. Are there other rate design topics that the Commission might consider?**

951 A. Yes. There are numerous rate design topics that could be addressed in this proceeding.
952 However, ComEd is making no proposals with respect to rate design, except for the very
953 limited proposals and updates previously addressed in this direct testimony. ComEd
954 remains committed to providing data to the extent practical for parties to investigate and
955 discuss other revenue requirement neutral rate design topics that are not otherwise
956 included in the exhibits attached to this direct testimony.

957 **X. RESPONSES TO COMMISSION DIRECTIVES**

958 **Q. Did ComEd respond to the Commission's directives pertaining to delivery class cost
959 allocation and rate design?**

960 A. Yes. ComEd responded to the Commission's directives in the 2010 Rate Case Order, as
961 well as to directives in the Docket No. 11-0498 Order, the 2011 FR Case Order, and the
962 2012 FR Update Case Order. A listing of the various directives, the manner in which
963 ComEd responded to those directives, and identification of the corresponding ComEd
964 exhibits that contain or in some cases refer to those responses is presented in Table CST-
965 D28: ComEd Responses to Commission Directives.

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
<p>“ComEd shall work with Staff on this issue [primary/secondary] to develop a scientifically-significant representative of its direct observations on this issue. It shall also have this representation in its cost of service study/studies in its next rate case. This analysis shall be part of any initial rate case filing that ComEd makes.”</p>	<p>2010 Rate Case Order at 180-81</p>	<p>Study Report #2, <i>Meeting Commonwealth Edison’s Distribution Allocation Requirements from Illinois Commerce Commission Order 10-0467</i>, (“CA Distribution Study”) and Illustrative ECOSs #1 and #1TB submitted to the ICC and stakeholders on November 8, 2011</p> <p>Updated Study provided in ComEd Ex. 3.07</p>	<p>ComEd Ex. 3.07, ComEd Ex. 2.0, ComEd Ex. 3.0, ComEd Ex. 3.10, ComEd Ex. 3.11, ComEd Ex. 3.14, and ComEd Ex. 3.15</p>
<p>“ComEd shall examine a larger, representative sample in its analysis and present the results contemporaneously with the initial filing in its next rate case. In addition, ComEd shall work with Staff to develop representative samples and to develop a scientifically acceptable sample of these circuits. The Commission further notes that the final Order in Docket No. 08-0532 required direct observation or sampling. (Docket No. 08-0532, Final Order of April 21, 2010, at 40). ComEd did neither one of these two choices, in what could be considered a meaningful way.”</p>	<p>2010 Rate Case Order at 182</p>	<p>CA Distribution Study and Illustrative ECOSs #1 and #1TB submitted to the ICC and stakeholders on November 8, 2011</p>	<p>ComEd Ex. 3.07, ComEd Ex. 2.0, ComEd Ex. 3.0, ComEd Ex. 3.10, ComEd Ex. 3.11, ComEd Ex. 3.14, and ComEd Ex. 3.15</p>
<p>“In its next initial rate case filing, ComEd shall produce cost of service studies that reflect analysis of what other utilities do regarding this issue in a meaningful manner. ComEd shall also proffer evidence at that time, establishing that it analyzed other these utilities’ [sic] cost of service studies, and any other evidence that should be readily-available on other state public utility commissions’ websites. ComEd is further required to consult with the authors of these studies, as well as any NARUC publications on the issue, and to do any and all other actions that are necessary in order to determine how other utilities in the United States determine this issue. ComEd is also required to work with Staff regarding this issue.”</p>	<p>2010 Rate Case Order at 185</p>	<p>Study Report #1, <i>Survey of Approaches to Distribution Cost Allocation by Voltage</i> (“CA Cost Allocation Survey”) submitted to the ICC and stakeholders on November 8, 2011</p>	<p>ComEd Ex. 3.09</p>

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
<p>“[The Commission] directs ComEd to work with Metra and the CTA, and Staff if appropriate, to study, define, and delete from the costs assigned to the Railroad Class the costs that are associated with the 4 kV facilities that are not used to serve the Railroad Class. Pursuant to that effort, ComEd shall develop a new embedded cost of service study for the next rate case that excludes the costs that are associated with facilities below 12 kV from the Railroad Class. This study shall be part of ComEd’s initial rate case filing. Failure to comply with any portion of this directive could subject ComEd to the penalties provided in the Public Utilities Act for failure to comply with a Commission Order.”</p>	2010 Rate Case Order at 191	CA Distribution Study and Illustrative ECOSSs #2 and #2TB submitted to the ICC and stakeholders on November 8, 2011	ComEd Ex. 3.07, ComEd Ex. 2.0, ComEd Ex. 3.0, ComEd Ex. 3.10, ComEd Ex. 3.11, ComEd Ex. 3.12, and ComEd Ex. 3.13
<p>“ComEd shall therefore undertake a study of the distribution assets used to serve the Extra Large Load customer class. That study shall be part of any initial filing in its next rate case.”</p>	2010 Rate Case Order at 195	CA Distribution Study submitted to the ICC and stakeholders on November 8, 2011	ComEd Ex. 3.07, ComEd Ex. 2.0, ComEd Ex. 3.0, ComEd Ex. 3.10, ComEd Ex. 3.11, ComEd Ex. 3.14, and ComEd Ex. 3.15
<p>“In the future, (in ComEd’s next rate case or rate design case) ComEd shall include the segregated indirect uncollectible costs in a cost of service study in the manner that Mr. Bodmer set forth in his rebuttal testimony. This study shall be part of ComEd’s initial rate case filing in ComEd’s next rate case.”</p>	2010 Rate Case Order at 204	Study Report #4, <i>Commonwealth Edison Company Study Reports Called For by the Order in Docket No. 10-0467 Indirect Collectible Costs</i> and Illustrative ECOSSs #4 and #4TB submitted to the ICC and stakeholders on November 8, 2011 Updated Study provided in ComEd Ex. 3.08	ComEd Ex. 3.08, ComEd Ex. 3.0, and ComEd Ex. 3.16
<p>“However, the Commission takes particular note of arguments regarding the possible disparate impact of a SFV design on low-use customers, especially in the Chicago region. Therefore, in its next rate proceeding, ComEd must provide evidence that demonstrates whether the impacts on the low-use sub-group in the residential customer class are such that it would be appropriate to have a new class cost of service and rate design for that identifiable group. The Commission also encourages ComEd to explore how it defines the low-use customer sub-class.”</p>	2010 Rate Case Order at 232	Study Report #6, Residential Usage Study, submitted to the ICC and stakeholders on November 8, 2011	ComEd Ex. 2.33

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
<p>“[W]ithin one year from the date that a Final Order issues in this docket, ComEd shall file a report, clearly identifying it as required by Docket No. 10-0467, which identifies and describes solutions to eliminate ComEd’s dependence on, and use of, each of the CTA-owned and Metra-owned railroad traction power substations to supply its other customers, and include estimated costs to implement each solution. ... At the time of its next rate case filing, ComEd shall file an updated copy of the report to reflect any progress parties have made in eliminating ComEd’s use and dependence upon Railroad Customer facilities.”</p>	<p>2010 Rate Case Order at 274</p>	<p>Study Report #5, <i>Use of Railroad Customers’ Electric Traction Power Facilities</i>, submitted to the ICC and stakeholders on November 8, 2011, and filed with the ICC on May 22, 2012</p> <p>Updated Study provided in ComEd Ex. 4.03</p>	<p>ComEd Ex. 4.03 and ComEd Ex. 4.0</p>
<p>“ComEd shall segregate the SEC and SERVICE elements in any future rate case in its initial filing.”</p>	<p>2010 Rate Case Order at 291</p>	<p>Study Report #3, <i>2010 ComEd Distribution System Loss Factor Study</i>, and Illustrative ECOSSs #3 and #3TB submitted to the ICC and stakeholders on November 8, 2011</p> <p>Updated Distribution System Loss Study and Secondary and Service Loss Study provided in ComEd Exs. 4.01 and 4.02</p>	<p>ComEd Ex. 4.01, ComEd Ex. 4.02, and ComEd Ex. 4.0</p>
<p>“Requiring ComEd to update its Distribution Loss Study with information from an updated Transmission Loss Study is uncontested. The Commission, therefore, adopts Staff’s recommendation that ComEd provide an updated distribution loss study to all parties of record in the instant docket by the end of 2011.”</p>	<p>2010 Rate Case Order at 291</p>	<p>Study Report #7A, <i>Transmission System Loss Study</i>, and Study Report #7B, <i>2010 ComEd Distribution System Loss Factor Study</i>, submitted to the ICC and stakeholders on December 21, 2011, along with Illustrative ECOSS #5</p> <p>Pursuant to the Commission’s directive in the 2011 FR Case, the Transmission System Loss Study was used in developing the Distribution System Loss Study. See ComEd Ex. 10.6 in the 2012 FR Update Case</p>	

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
<p>“Concerning the proper allocation of costs amongst rate BES customers in general, it should be noted at the outset that a rate subsidy will remain with respect to dusk-to-dawn customers. Mr. Alongi testified that dusk-to-dawn customers served on rate BES are smaller municipalities. (Tr. 36-37). There are no small municipalities being represented in this docket. Therefore, this docket does not address that subsidy. Additionally, the non-residential customers that are currently subsidizing the cost of residential space heat customers are watt-hour customers without electric heat and demand customers without electric heat. (Tr. 35-36). These customers also are not represented in this docket.”</p>	<p>Docket No. 11-0498 Order at 6-7</p>	<p>See Section IX(B) of this direct testimony</p>	<p>ComEd Ex. 2.0</p>
<p>"Commonwealth Edison Company shall provide, in the next proceeding in which revenue neutral delivery service rate design issues are properly addressed, all parties thereto with an analysis of the impact on customer classes of reallocating NCP-related delivery costs using a single NCP allocator for the residential sector. This analysis should be provided at the outset of the proceeding, if it is initialed by a filing by Commonwealth Edison Company, including but not limited to a tariff filing. If such a proceeding is initiated by the Commission, the analysis must be provided on the date that Commonwealth Edison Company must submit its direct testimony or within 30 days of the initiation of the proceeding, whichever is later."</p>	<p>Docket No. 11-0498 Order at 8</p>	<p>See Section VII and Section VIII of this direct testimony</p>	<p>ComEd Ex. 2.0, ComEd Ex. 2.16, ComEd Ex. 2.17, ComEd Ex. 2.18, ComEd Ex. 2.19, ComEd Ex. 3.0, ComEd Ex. 3.17, ComEd Ex. 3.18, and ComEd Ex. 3.19</p>
<p>“ComEd should fully comply with the final order in 10-0467 in its next rate design case.”</p>	<p>2011 FR Case Order at 142</p>	<p>ComEd took it upon itself to reach out to and work with CTA and Metra in updating the study of ComEd’s use of facilities on properties owned by the CTA or Metra. See Section X of this direct testimony</p>	<p>ComEd Ex. 2.0, ComEd Ex. 4.0, and ComEd Ex. 4.03</p>

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
“ComEd is directed to recover 50% of fixed costs through fixed charges, and the remaining 50% of fixed costs through volumetric charges for these classes.”	2011 FR Case Order at 146	Compliance filing submitted June 6, 2012 Original Informational Sheets No. 24 through No. 30	ComEd Ex. 2.03, ComEd Ex. 2.04, ComEd Ex. 2.06, ComEd Ex. 2.07, ComEd Ex. 2.08, ComEd Ex. 2.09, ComEd Ex. 2.10, ComEd Ex. 2.11, ComEd Ex. 2.12, ComEd Ex. 2.13, ComEd Ex. 2.14, ComEd Ex. 2.15, ComEd Ex. 2.16, ComEd Ex. 2.17, ComEd Ex. 2.18, and ComEd Ex. 2.19
“ComEd shall, therefore, pursuant to its next reconciliation docket pursuant to Section 16-108.5 of the Public Utilities Act, file a distribution loss study that incorporates clearly-separate designations for values for both SEC and SERVICE elements. ComEd shall also have updated (2011) evidence establishing updated transmission losses, as well as 2011 class loads.”	2011 FR Case Order at 173	Included in ComEd Ex. 10.6 as part of the compliance filing on June 13, 2012, in the 2012 FR Update Case based on the findings in the 2011 FR Case	
“Therefore, a proceeding shall commence for the purpose of developing a study with participation from all of the parties that are affected by ComEd’s use of facilities on properties owned by the CTA or Metra.”	2011 FR Case Order at 176	Absent a docketed proceeding, ComEd took it upon itself to reach out to and work with CTA and Metra in updating the study of ComEd’s use of facilities on properties owned by the CTA or Metra. See Section X of this direct testimony	ComEd Ex. 2.0, ComEd Ex. 4.0, and ComEd Ex. 4.03
“As such, it is appropriate in this proceeding to adjust the customer count portion due to the inclusion of plant to serve New Business in 2012 in the revenue requirement. By applying this adjustment, the billing determinants will more accurately match the number of customers that are served by plant additions and customer growth, otherwise the rate per customer will be too high. The Commission also agrees with Staff’s recommendation to use ComEd’s own numbers, as presented in ComEd Ex. 13.0, rather than the specific adjustments proposed by AG/AARP and CUB. Staff Reply Brief at 7-8. ComEd shall adjust its billing determinants accordingly.”	2012 FR Update Case Order at 29	Compliance Filing submitted December 21, 2012 2nd Revised Informational Sheets No. 24 through No. 30	

Table CST-D28: ComEd Responses to Commission Directives			
Directive	Proceeding	Response	Reference Exhibit(s)
<p>“Both Staff and ComEd find the short time deadlines in Section 16-108.5 to be so restrictive as to preclude ComEd from being able to conduct a Secondary and Service Loss Study in a manner that includes a representative sampling therein. The Commission notes that this is some indicia that the short time deadlines in this statute do not provide any of the parties with adequate time to conduct discovery and present evidence. However, it is not contested that ComEd shall be required to update its DLF Study and its Secondary and Service Loss Study in its revenue-neutral cost of service and rate design case, which will be filed in the first half of 2013. At that time ComEd shall file studies that do not have significant gaps in accuracy, such as the Secondary and Service Loss Study that was presented in this case. Any failure to do so will be considered to be ignoring a Commission Order.”</p>	<p>2012 FR Update Case Order at 82</p>	<p>See ComEd Exs. 4.0, 4.01, and 4.02</p>	<p>ComEd Ex. 4.0, ComEd Ex. 4.01, and ComEd Ex. 4.02</p>

966

967 **Q. How did ComEd respond to various Commission directives in the 2010 Rate Case**
 968 **Order that instructed ComEd to work with the ICC Staff, as well as representatives**
 969 **from the RR Delivery Class?**

970 **A.** Since the 2010 Rate Case Order was issued in 2011, ComEd has worked closely with
 971 members of the ICC Staff, representatives of the RR Delivery Class, and individuals
 972 identifying themselves as representing the ELL Delivery Class to address the topics the
 973 Commission directed ComEd to investigate in a collaborative effort. The key topics that
 974 were addressed included (a) the use of direct observations, (b) the allocation of costs
 975 associated with 4 kV facilities, (c) sampling circuits, (d) the treatment of assets used to
 976 serve the ELL Delivery Class, and (e) the use of facilities owned by customers in the RR
 977 Delivery Class.

978 **Q. What do you mean by saying ComEd worked closely with the parties you identified?**

979 A. By working closely, I refer to multiple meetings, conference calls, and individual
980 discussions on the key topics that were directed to be addressed in the 2010 Rate Case
981 Order. In addition, this work also included opportunities for these parties to review drafts
982 of various reports and documents, provide feedback and comments on those draft reports
983 and documents, and ask questions about data used in the development of those reports
984 and documents.

985 For example, ComEd personnel had meetings with representatives of the Chicago
986 Transit Authority (“CTA”) and Metra beginning in the summer of 2011. Since that time,
987 ComEd and representatives of the RR Delivery Class performed additional reviews of
988 Study Report #5, *Use of Railroad Customers’ Electric Traction Power Facilities*, that
989 was provided to the ICC and parties on November 8, 2011, and subsequently filed with
990 the ICC on May 22, 2012. Collaboratively, edits were made to that report to include
991 additional items of interest, including the investigation of an additional approach and the
992 inclusion of direct costs to achieve from both CTA and Metra. This updated report is
993 presented by Mr. Born in ComEd Ex. 4.03.

994 Q. **What is the Residential Usage Study?**

995 A. The Residential Usage Study was prepared in response to the Commission’s directive in
996 the 2010 Rate Case Order at page 232:

997 “Therefore, in its next rate proceeding, ComEd must provide evidence that
998 demonstrates whether the impacts on the low-use sub-group in the
999 residential customer class are such that it would be appropriate to have a
1000 new class cost of service and rate design for that identifiable group. The
1001 Commission also encourages ComEd to explore how it defines the low-
1002 use customer sub-class.”

1003 ComEd submitted the report to the ICC and stakeholders on November 8, 2011, with the
1004 initial filing of the 2011 FR Case. In that case it was designated as Study Report #6. A
1005 copy of the Residential Usage Study is attached to this direct testimony in ComEd Ex.
1006 2.33.

1007 **XI. PUBLIC NOTICE**

1008 **Q. Did ComEd prepare a form of public notice for the tariff filing that is the subject of**
1009 **this direct testimony consistent with the Commission rules for the filing of a general**
1010 **rate case?**

1011 **A.** Yes. For transparency purposes, ComEd Ex. 2.34 provides the form of public notice that
1012 ComEd will publish similar to the public notice that is required in a general rate case
1013 filing pursuant to Title 83 Illinois Administrative Code Part 255.20.

1014 **XII. CONCLUSION**

1015 **Q. What general conclusions can be drawn from your direct testimony?**

1016 **A.** Five general conclusions can be drawn from this direct testimony. First, ComEd is not
1017 proposing any change to the equations and methodologies used in the 2013 FRU Rate
1018 Design at this time. The RDI Rate Design differs from the 2013 FRU Rate Design in that
1019 it uses cost data input from the RDI ECOSS and FIL data inputs that reflect ComEd's
1020 proposal to offer LED lighting units to the FIL Delivery Class. Second, ComEd is
1021 providing numerous illustrative rate designs and accompanying sets of delivery service
1022 charges based upon various illustrative ECOSSs that have differing allocations of costs to
1023 the fifteen delivery classes in order to provide information that allows informed
1024 consideration of various revenue requirement neutral tariff changes related to rate design
1025 in ComEd's Schedule of Rates. Third, ComEd is proposing to update various other

1026 miscellaneous charges and provisions in its Schedule of Rates that are not addressed or
1027 updated in the annual formula rate update process. Fourth, ComEd is proposing to offer
1028 customers in the FIL Delivery Class a new energy-efficient lighting option. Finally,
1029 ComEd has responded to the Commission directives pertaining to cost allocation and rate
1030 design in the 2010 Rate Case Order, the 2011 FR Case Order, the Docket 11-0498 Order,
1031 and the 2012 FR Update Case Order.

1032 Q. **Does this complete your direct testimony?**

1033 A. Yes.

GLOSSARY OF TERMS

2010 Rate Case - Docket No. 10-0467

2011 FR Case - Docket No. 11-0721

2012 FR Update Case - Docket No. 12-0321

\$ - Dollar

% - Percent

AMI – Advanced Metering Infrastructure

CATV – Cable Television

ComEd – Commonwealth Edison Company

Commission or ICC – Illinois Commerce Commission

CTA – Chicago Transit Authority

DASR – Direct Access Service Request

DDL – Dusk to Dawn Lighting

DFC – Distribution Facilities Charge

DLF – Distribution Loss Factor

ECOSS - Embedded Cost of Service Study

ELL – Extra Large Load

EPEC – Equal Percentage of Embedded Cost

ESSD – Electric Supplier Services Department

Ex. - Exhibit

FIL – Fixture-Included Lighting

GL – General Lighting

GTC – General Terms and Conditions

HPS – High Pressure Sodium

HV – High Voltage

IEDT – Illinois Electricity Distribution Tax Charge

kV - Kilovolt

kW - Kilowatt

kWh – Kilowatt-hour

LED – Light Emitting Diode

LL – Large Load

MFH – Multi Family With Electric Space Heat

MFNH – Multi Family Without Electric Space Heat

ML – Medium Load

MRC – Monthly Rental Charge

MSP – Metering Service Provider

MV – Mercury Vapor

Rate Year Net Revenue Requirement – Amount approved by the Commission and determined in accordance with provisions of Section 16-108.5 of the Public Utilities Act and Rate DSPP – Delivery Service Pricing and Performance that is reflected in delivery service charges designed to allow Commonwealth Edison Company to recovery its annual costs to provide Illinois-jurisdictional delivery service

PUA or Act – Public Utilities Act

PV – Primary Voltage

Rate BES – Basic Electric Service

Rate BESH - Basic Electric Service Hourly Pricing

Rate DSPP – Delivery Service Pricing and Performance

Rate GAP – Government Aggregation Protocols

Rate MSPS – Metering Service Provider Service

Rate RDS – Retail Delivery Service

RDI – Rate Design Investigation

RES – Retail Electric Supplier

Rider ML – Meter-Related Facilities Lease

Rider PE – Purchased Electricity

Rider POU – Purchase of Uncollectibles

Rider RCA – Retail Customer Assessments

Rider SBO – Single Bill Option

RR - Railroad

RRTP – Residential Real Time Pricing

RSS - Regulatory Strategies and Solutions

SBO – Single Bill Option

SFH – Single Family With Electric Space Heat

SFNH - Single Family Without Electric Space Heat

SL – Small Load

SMA – Standard Meter Allowance

VLL – Very Large Load

WH – Watt-Hour