STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

Commonwealth Edison Company	)	
	)	ICC Docket No. 13-0387
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	)	

REBUTTAL TESTIMONY

OF

HARRY L. TERHUNE

ON BEHALF OF THE COALITION TO

REQUEST EQUITABLE ALLOCATION OF COSTS TOGETHER

REACT

COMPRISED OF:
A. FINKL & SONS, CO.
AUX SABLE LIQUID PRODUCTS, LP
CHARTER DURA-BAR
THE CITY OF CHICAGO
COMMERCE ENERGY, INC.
FLINT HILLS RESOURCES, LP
FUTUREMARK PAPER COMPANY
INTERSTATE GAS SUPPLY, INC.
THE METROPOLITAN WATER RECLAMATION DISTRICT OF GREATER CHICAGO
PDV MIDWEST REFINING, LLC (CITGO)
UNITED AIRLINES, INC.

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REBUTTAL TESTIMONY OF HARRY L. TERHUNE

I.

INTRODUCTION AND OVERVIEW

Q. Please state your name, occupation, and business address.

A. My name is Harry L. Terhune. I am an independent consultant, and my business address is Terhune Consulting LLC, 5 W. Central Rd. #206, Mt. Prospect, IL 60056.

Q. Are you the same person who provided Direct Testimony in this proceeding on behalf of REACT?

A. Yes.

Q. What was the purpose of your Direct Testimony?

A. In general terms, my Direct Testimony discusses the following items:

1. After summarizing my background, qualifications, and familiarity with the ComEd distribution system as a former ComEd engineer, my Direct Testimony explains in detail the over-allocation of the Shared Distribution

Lines component of retail delivery service costs to customers in ComEd's "Extra Large Load Delivery Class" (referred to herein as the "ELLC" class) and "over 10 MW High Voltage Delivery Class" (referred to herein as the "HV Over 10 MW" class) under ComEd's Embedded Cost of Service Study ("ECOSS"). (*See* REACT Ex. 2.0 at 2:16-18:432.) Consistent with the basic cost causation principle of assigning the costs to the cost-causers, which has been repeatedly endorsed by the Commission, only those facilities and related expenses reasonably associated with service to a particular class of customer should be assigned to that class, and the costs of those facilities and expenses should only be assigned to the extent that class utilizes such facilities.

2. My Direct Testimony then quantifies the extent of such over-allocation to the ELLC and the HV Over 10 MW classes. (*See id.* at 18:435-33:781.)
3. My Direct Testimony then explains that under ComEd's current tariff structure, ComEd has violated basic cost causation principles by over-allocating the costs of certain distribution system components to the ELLC and the HV Over 10 MW classes. (*See id.* at 33:783-36:859.)
4. Finally, my Direct Testimony recommends straightforward ways in which the Commission should correct the undue burden that ComEd has placed upon the ELLC and HV Over 10 MW classes. (*See id.* at 37:861-41:953.)

Q. Did ComEd respond to your Direct Testimony?

A. Yes. ComEd witnesses Bradley L. Bjerning and Michael T. O'Sheasy respond to my Direct Testimony.

Q. How do Messrs. Bjerning and O'Sheasy respond to your Direct Testimony?

A. The Rebuttal Testimony of ComEd witnesses Messrs. Bjerning and O'Sheasy is more telling in what it does not say than what it says. (*See* ComEd Ex. 7.0 at 24:407-30:525; ComEd Ex. 11.0 at 6:120-11:227.) Neither ComEd witness disputes the accuracy of my comprehensive description of the ComEd distribution system. Similarly, neither ComEd witness disputes the accuracy of my analyses or my findings.

For example, neither of the ComEd witnesses disagrees with my finding that ComEd's own data demonstrate that the ELLC and HV Over 10 MW classes do not use (or only use to a *de minimis* extent) single- and two-phase and 4kV facilities. Thus, ComEd concedes that both my methodology and the conclusions of my analysis are fundamentally sound.

ComEd's witnesses essentially just assert that ComEd should be allowed to keep doing things as it has been, continuing to use a Shared Distribution allocation methodology which assigns such costs to the ELLC and HV Over 10 MW classes -- even though they admit that these classes do not use such facilities or their use is *de minimis*. (*See* ComEd Ex. 7.0 at 29:491.)

ComEd's witnesses further assert that ComEd should not be required to do a further study of its distribution system to more accurately allocate costs because such a study could be potentially "complicated and resource intensive." (*See id.*)

Q. Did anything in the Rebuttal Testimony of Messrs. Bjerning and O'Sheasy change your opinion regarding ComEd's allocation of costs to the ELLC and HV Over 10 MW classes?

A. No. My Direct Testimony explains how ComEd has allocated the costs associated with certain primary distribution facilities to the ELLC and HV Over 10 MW customer classes, even though such customers do not use these facilities or only use them to a *de minimis* extent. Because ComEd does not offer any evidence to demonstrate that my analysis of its distribution system was flawed or that the relied upon ComEd data was inaccurate, there is no additional material, information, or perspective that would suggest any contrary view regarding ComEd's misallocation of costs to the ELLC and HV Over 10 MW classes.

Further, in previous Commission cases, ComEd made the same objections to conducting additional studies to more accurately allocate costs, yet ComEd hired able consultants to execute exactly the types of studies of its distribution system that it previously suggested would be near impossible; in fact, Mr. Bjerning indicates that ComEd could hire the same consultant (Christensen Associates Energy Consulting) to do additional studies, if the Commission concludes that further analysis is warranted. (*See id.* at 30:519-525.)

Q. Given that ComEd has not materially challenged the analysis or conclusions in your Direct Testimony, what is the purpose of your Rebuttal Testimony?

A. The purpose of my Rebuttal Testimony is to further explain how ComEd has over-allocated the costs associated with certain primary distribution facilities to the ELLC and HV Over 10 MW customer classes, and to respond to the arguments made by ComEd witnesses Messrs. Bjerning and O'Sheasy in their Rebuttal Testimony. Unfortunately, Messrs. Bjerning and O'Sheasy repeatedly mischaracterize my proposal apparently in an attempt to make it sound like appropriate cost allocation is somehow improper or unduly burdensome. As a result, my Rebuttal Testimony clarifies the straight-forward steps that the Commission should take to more accurately allocate the costs to the cost causers. In addition, my Rebuttal Testimony comments upon the Direct Testimony of Staff witness William R. Johnson.

Q. What is your general recommendation?

A. My recommendation has not changed. The Commission should ensure that ComEd does not assign to the ELLC and HV Over 10 MW customer classes costs associated with facilities that are not used to provide service to those customers. For the facilities that the ELLC and HV Over 10 MW customer classes only use to a *de minimis* extent, those facilities should be charged only in proportion to their use of such facilities, compared to the use of those types of facilities by other customer classes.

II.

RESPONSE TO COMED WITNESS BRADLEY L. BJERNING

Q. How does ComEd witness Bradley L. Bjerning respond to your Direct Testimony regarding the allocation of costs to the ELLC and High Voltage Over 10 MW customer classes?

A. Mr. Bjerning admits that my analysis of ComEd's own data demonstrates that the use of single-phase and two-phase and 4 kV facilities by ELLC and HV Over 10 MW customers is *de minimis*. (*See* ComEd Ex. 7.0 at 25:415-422.) Mr. Bjerning also correctly notes that I conclude that the allocation of costs for such facilities to the ELLC and HV Over 10 MW customers should be limited to their proportional *de minimis* use of such facilities. (*See id*.) In response to discovery, ComEd admitted that Mr. Bjerning does not dispute my findings that: (1) approximately 51.6% of primary distribution lines are single- or two-phase; and (2) less than 1% of the load of the ELLC and HV Over 10 MW classes is served by single- or two-phase primary connections. (*See* ComEd Response to REACT Data Request 5.03, attached hereto as REACT Ex. 5.1.)

Q. Does Mr. Bjerning dispute the findings of your analysis?

No. Mr. Bjerning does not make any statements or offer any evidence rebutting my finding that ComEd's own data demonstrate that ELLC and HV Over 10 MW customers use a *de minimis* amount of facilities that operate at 4 kV or are in a single-phase or two-phase configuration. (*See* ComEd Ex. 7.0 at 25:415-422.)

Q. Does Mr. Bjerning describe how costs for these facilities are allocated in ComEd's ECOSS?

A. Yes. Mr. Bjerning states that "Generally, the cost for primary voltage distribution lines and facilities are in the Shared Distribution Lines category in ComEd's ECOSS, the costs of which are allocated using the primary/secondary study and coincidental peak allocation factors." (*Id*. at 25:423-426.)

Q. Is ComEd's current allocation methodology for assigning costs to the ELLC and HV Over 10 MW classes appropriate?

A. No. ComEd has long had a variety of customer classes and subclasses in its rate structure. Consistent with cost causation principles that have been repeatedly endorsed by the Commission, this differentiation between classes or subclasses is intended to be based on reasonably verifiable differences in the cost to serve the customers represented in those groups. That is, the charges imposed upon a class or subclass should reflect the costs incurred to serve those customers. ComEd witness Mr. O'Sheasy admits in a Data Request Response that cost causation is the historical touchstone for ComEd's determination of cost allocation to and within rate classes and subclasses. (*See* ComEd Response to REACT Data Request 5.17(b), attached hereto as REACT Ex. 5.2.) Yet, this bedrock principle of rate design is <u>not</u> being followed by ComEd when it comes to its ELLC and HV Over 10 MW customer classes.

Specifically, in the case of the Shared Distribution Lines category, ComEd's methodology incorrectly presumes that there are no differences in the cost of necessary facilities between the various customer classes other than level of demand. My Direct Testimony in this proceeding, as well as my Direct and Rebuttal Testimony in ICC Docket No. 10-0467 (the "2010 ComEd Rate Case"), demonstrates that there are significant differences in the degree to which different classes or subclasses of ComEd customers utilize certain facilities within the category of Shared Distribution Lines. ComEd's witnesses do not disagree with my analysis; they just dislike the implication of the analysis, which is that ComEd should modify its allocation methodology.

Q. Why is differentiation of distribution delivery costs between customer classes or subclasses important?

A. The changes in both the Illinois retail electric market and the law governing Commission proceedings make it appropriate for the Commission to more closely examine the allocation of costs between ComEd's customer classes and subclasses. When ComEd was an integrated utility, the costs associated with generation assets, fuel, purchased power, and bulk transmission far outweighed the costs associated with distribution delivery. Today, however, ComEd is primarily a delivery company, and ComEd's core function is to provide reliable and cost-effective <u>delivery</u> of power and energy. The generation, fuel, and other supply-related costs now are part of the competitive market. To the extent that it incurs supply-related costs, ComEd should simply pass through such costs, as

well as the FERC jurisdictional costs of the bulk power system. The allocation of the costs associated with providing delivery services is the *sole focus* of this proceeding, as a result of the recent amendment to the Public Utilities Act allowing ComEd to pursue formula rates, and requiring this specific proceeding to evaluate allocation issues.

If there are meaningful differences in the cost of ComEd's delivery services facilities used to provide delivery services to each customer class and subclass, those differences in cost causation should properly be reflected in ComEd's ECOSS and ultimately via rate design, in differences in delivery rates to the customer classes and subclasses.

Q. Does Mr. Bjerning have concerns regarding a Commission-ordered study to address this issue?

A. Yes. Mr. Bjerning relies upon the testimony of Commission Staff witness Peter Lazare from the 2010 ComEd Rate Case, who opined that a study of primary distribution system costs would be "one-sided." (*See* ComEd Ex. 7.0 at 27:448-28:480). He later states that a study which may possibly not be considered one-sided would "be complicated" and "would most likely raise concerns with parties that represent secondary voltage and single-phase customers." (*Id.*)

Q. Do you agree that such a study would be so complicated that it should not be undertaken?

A. No. As mentioned earlier, this type of objection from ComEd was seen in prior rate cases. The Commission was unconvinced, and over ComEd's objections, appropriately ordered certain studies of ComEd's facilities to be performed so that ComEd's rates would better reflect the costs of the delivery services facilities used to provide service to particular classes. Hiring competent consultants, ComEd was able to complete the work as ordered by the Commission. Based upon my engineering expertise and my understanding of the capabilities of the consultants that ComEd used for prior related studies, it is clear that additional study is feasible and would provide valid and useful information to further ensure that ComEd's rate design conforms with cost causation principles.

Q. Do you agree with other concerns raised by Mr. Bjerning regarding ComEd further studying its distribution costs?

A. No. None of Mr. Bjerning's other concerns constitute a reason for not performing further analysis. Regarding his concern over "one-sided" analysis, that issue is overblown. REACT and IIEC, both in this proceeding and in the 2010 ComEd Rate Case, have shown that Shared Distribution Line costs have been over-allocated to the ELLC and the HV Over 10 MW classes; no representative from another customer class has performed a similar study to rebut this analysis or to suggest that other facilities are improperly allocated. Just because members of a particular customer class primarily focus on that class's unjust treatment by the

utility (based upon utility-provided data), that is not a reason to call into question the validity of that analysis. Similarly, just because that analysis focused on particular customer classes and not others, that does not make the analysis invalid. Indeed, if ComEd thought that this analysis was so "one-sided" as to be invalid, its witnesses had the opportunity to make that case by actually explaining some flaw in the analysis -- yet, they have not done so. This is confirmed by ComEd's Response to REACT Data Request 5.05(a), which is attached hereto as REACT Ex. 5.3.

It is not a valid criticism to imply that the analysis is incorrect simply because it did not calculate other customer classes' responsibility for the overcharges to the ELLC and HV Over 10 MW classes. Again, this analysis is based on information that was provided by ComEd itself, and neither my general approach and viewpoint nor my specific conclusions have been specifically challenged -- either in this case or in the 2010 ComEd Rate Case. If ComEd believes that the analysis is problematic for any reason, it has now had several years to formulate an actual alternative analysis (if one exists) to show why its costs are being accurately allocated. The lack of alternative analysis from ComEd is very telling.

Q. Mr. Bjerning states, "Performing such a 'path of service' study may require additional field sampling and numerous assumptions to assign the costs of ComEd's approximately 6,400 primary voltage circuits." (*Id.* at 29:484-86.) Would the scope of such a study would be an excessive burden on ComEd?

A. No. First, it is very important to understand that REACT's immediate request does not require a single further study. REACT requests that the Commission, in this proceeding, based upon the evidence already presented, direct ComEd to make a reasonable adjustment to the customer class allocations of Shared Distribution Lines costs to remedy misallocations, using ComEd's own engineering judgment to apply the findings in my Direct Testimony. The existing analysis is easily sufficient to justify a modification of the rate design now. ComEd already has the information necessary to fulfill this first step; it requires no study beyond the analysis that already has been performed.

Using the data already presented in this proceeding, ComEd should be required to reallocate these costs. Based upon ComEd's RDI ECOSS, ComEd's total revenue requirement is approximately $2 Billion. The Shared Distribution Lines allocation to the ELLC and HV Over 10 MW customer classes is about $26 Million; which is artificially inflated by approximately one-third due to the improper inclusion of single-phase and two-phase and 4 kV facilities. If the adjustment of $8.7 Million (one-third of the $26 Million) were simply spread over all classes, including the ELLC and HV Over 10 MW classes, the impact would be less than one-half percent to each class.

Q. What additional action do you recommend that the Commission take to better assign the costs to the cost causers?

A. The Commission should require a more comprehensive approach to allocation for future rate design proceedings, involving a statistically valid sampling of the distribution delivery facilities used to provide delivery services to each customer class. Again, even ComEd acknowledges that this is feasible and could be performed by the consultants that have performed other recent Commission-ordered studies. (*See* ComEd Ex. 7.0 at 30:519-25.)

Q. Do you propose that the 4.8 million customer meter points referenced by Mr. Bjerning be classified as served at 4 kV, or by single-phase, two-phase or three-phase primary line connections?

A. No. Any suggestion that an appropriate cost allocation study would require analysis of 4.8 million initial data points is false; even Mr. Bjerning refers to a "statistically valid sample" of those 4.8 million meter points. Likewise, the proposal is not to have existing Shared Distribution Lines plant accounts be re-classified by number of phases or primary voltage. The existing plant records were not created in a manner that facilitates such a classification, and starting such a classification system currently does not seem appropriate.

Q. Do you believe a "path of service" study would require additional field sampling as suggested by Mr. Bjerning?

A. No. Any implication from ComEd that these types of studies are overly burdensome or impossible is not persuasive. ComEd Ex. 3.07, the Commission-ordered Distribution Study performed by Christensen Associates ("Distribution Study"), demonstrated, among other things, that ComEd's internal records (*e.g.*, circuit maps, CEGIS, other digital data collections) reflected ComEd's actual facilities in the field with appropriate accuracy. There is no need to perform physical field inspections in order to more accurately allocate Shared Distribution Lines costs.

Q. Please summarize your recommendation.

A. The Commission should view this as a two-step process. First, in this proceeding, the Commission direct ComEd to make an approximate adjustment to the allocations to the ELLC and High Voltage over 10 MW customer classes based upon the evidence already presented. Second, for the longer term, the Commission should direct ComEd to perform a statistically valid sampling study of the allocation of Shared Distribution Lines costs to each of the customer classes and subclasses and incorporate the results into its ECOSS.

III.

RESPONSE TO COMED WITNESS MICHAEL T. O'SHEASY

Q. How does ComEd witness Michael T. O'Sheasy respond to your Direct Testimony?

A. Mr. O'Sheasy asserts that level of service should not be defined according to single-, two-, and three-phase service. (*See* ComEd Ex. 11.0 at 7:142-8:152). Mr. O'Sheasy testifies that, based on his experience and the research conducted as part of the Distribution Study, costs should not be allocated according to phase of service because determining the "path of service" for specific customers is time consuming and not commonly done in the industry. (*See id.*)

Q. Did the Distribution Study address the extent to which various customer classes use 4 kV lines?

A. Yes. The Distribution Study demonstrated that it was possible for ComEd to segregate 4kV primary distribution plant in the ECOSS separately from 12 kV and 34 kV primary facilities.

Q. Please describe the methodology used for the Distribution Study.

A. The Distribution Study relied upon a statistically valid sampling of the ComEd system, which produced credible information on the allocation of the physical components that is applicable to the entire ComEd system.

Christensen Associates developed a statistically valid random selection of all of ComEd customers, and then followed from each randomly selected customer back through the system, via service connection, secondary wires, transformer, primary

distribution lines (with its various components), as applicable, back to the source substation. Christensen Associates then used its data to allocate certain plant equipment types between primary and secondary voltage lines in a manner applicable to the system as a whole.

Q. Did the Distribution Study address any distinction among single-, two- and three-phase facilities?

A. No. That was not part of the Commission's mandate, so these facilities were not analyzed as part of the Distribution Study.

Q. Could ComEd similarly perform a study to determine, with reasonable confidence, an allocation of primary distribution facilities amongst the customer classes that reflected the degree to which those classes utilized 4 kV lines, as well as single-, two-, and three-phase lines?

A. Yes. This analysis could be completed "in the office," using ComEd's currently available plant records and data of various types, without requiring physical field inspection. Performing a "path of service" study would not necessarily require any additional field sampling to more accurately and appropriately assign the costs of ComEd's primary distribution voltage facilities.

Q. Please explain how the various customer classes and subclasses would be represented in such an analysis.

A. Within each relevant customer class or subclass, a randomly selected group of customers would be chosen to analyze from the customer's premises to the source substation. The sample size for each group would be determined using well known statistical methods, as was done in the Distribution Study. The sample would key on the selected customer, including all points of service and meters associated with that customer location. The sample should be chosen randomly from a population of customers within the class or subclass, not chosen merely from a population of meters without regard to customers with multiple meters or points of service at the same service premises. As Mr. Bjerning testifies, ComEd, in consultation with its consultant, Staff, and interested parties, could formulate a detailed methodology, as well as a confidence level and a margin or error to be used in such a study, for consideration and approval by the Commission. (*See* ComEd Ex. 7.0 at 30:519-25.)

Q. Would such a study provide a fair basis of Shared Distribution Lines cost allocation for all customer classes and subclasses?

A. Yes, if properly performed. Since the study would address customers of each customer class and subclass in the same consistent, statistically valid way, and use the same consistent ComEd plant records, each customer class would be able to have the same degree of confidence that its ultimate allocation is fair and appropriate.

Q. Are there any additional points in Mr. O'Sheasy's Rebuttal Testimony that you would like to address?

A. Yes. Mr. O'Sheasy states, in reference to my Direct Testimony and the Direct Testimony of IIEC witness Stevens, that "They propose to further define level of service according to single-phase, dual-phase and three-phase service." (ComEd Ex. 11.0 at 7:143-44.) However, my proposal is ***not*** to define any level of service by customer and by number of primary phases connected to serve that customer. Obviously, for operational purposes, ComEd already segregates between single- and three-phase meters at the customer's points of connection. Allocation of costs to a customer class or subclass should reflect the overall cost of service to those customers, driven by the utilization of utility plant by that class as a whole; a reasonably constructed and conducted sampling study can determine that allocation. Likewise, the proposal is ***not*** "allocation by exclusion" (to use Mr. O'Sheasy's term), but rather to have ComEd re-allocate its costs to reasonably remedy discriminatory existing allocations that are shown by the unchallenged analysis. The "path of service" is a proper component of a statistically valid sampling study to provide a just and reasonable allocation of Shared Distribution Lines costs among all classes and subclasses.

Q. What else does Mr. O'Sheasy say about "path of service"?

A. Mr. O'Sheasy asserts that "Allocating by phase of service requires determining the path of service for specific customers, which is time consuming and not commonly done in the industry." (*See id*. at 10:20-205.)

Q. How do you respond?

A. Mr. O'Sheasy again has mischaracterized the proposal. This proposal does not call for such a determination of the costs for each specific customer, but rather calls for a probabilistic demonstration on the level of the class as a whole. Such an allocation of the costs of particular facilities to those customer classes that use those facilities is simply assigning the costs to the cost-causers.

Q. If the Commission accepts REACT's position, would this require numerous, repetitive allocation studies for each rate, rate design or formula rate case?

A. No. The rate of load growth in this era of energy conservation will limit the rate of change in physical components of the ComEd rate base and the relative contributions of different types of plant equipment to that rate base. If a properly designed allocation study to address Shared Distribution Lines is performed, its allocation proportions should remain reasonably constant for many years.

IV.

RESPONSE TO STAFF WITNESS WILLIAM R. JOHNSON

Q. Did Staff witness Mr. Johnson testify on anything relevant to your analysis?

A. Yes. Mr. Johnson makes a recommendation that the Commission approve the ComEd ECOSS methodology presented in ComEd Ex. 3.14, with the additional incorporation of "all the findings and recommendations presented in the [Christensen Associates] Distribution Study *other than those pertaining to the allocation of costs associated with 4kV facilities*." (Staff Ex. 1.0 at 42:898-902. Emphasis added.)

Q. Do you agree with Mr. Johnson's recommendation?

A. No. Mr. Johnson provided no basis for the exclusion of the Christensen Associates Distribution Study recommendation "pertaining to the allocation of costs associated with 4kV." Mr. Johnson's direct testimony does not contain any explanation of why that exclusion should be made, and contains no analysis that would support such a conclusion.

Q. Why do you disagree with Mr. Johnson's recommendation?

A. Mr. Johnson's recommendation is inconsistent with cost causation principles. The analysis of 4 kV allocation described in my Direct Testimony clearly indicates an over-allocation of 4 kV costs to the ELLC and High Voltage Over 10 MW customer classes. The Commission should direct ComEd to use an ECOSS that <u>includes</u> a separate determination of the appropriate allocation of costs

pertaining to 4 kV facilities, as well as the costs associated with single- and two-phase distribution facilities.

V.

CONCLUSION

Q. Please summarize your recommendation to the Commission.

A. There are certain groups of facilities that ELLC and HV Over 10 MW customers either never use or use to a *de minimis* level as part of receiving service from primary voltage distribution lines. Therefore, under the principle that costs should be assigned to their causers, the costs associated with single- and two-phase and 4 kV primary voltage distribution facilities should not be allocated to the ELLC and HV Over 10 MW customer classes, or the allocation should be in direct proportion to their *de minimis* use. In this proceeding, the Commission should direct ComEd to make reasonable adjustments to the allocation of Shared Distribution Lines costs to the ELLC and High Voltage over 10 MW customer classes based upon my analysis and ComEd's own engineering judgment. In the longer term, the Commission should direct ComEd to perform a statistically valid analysis to determine the proper proportion of Shared Distribution Lines costs to be assigned to each customer class or subclass and incorporate those results into its ECOSS. This statistically valid analysis should, at a minimum, address REACT's concerns about allocation of single-, two- and three-phase and 4 kV primary distribution line costs.

Q. Does that complete your testimony?

A. Yes. However, because discovery in this proceeding is ongoing, I reserve the right to update my analysis and supplement information to the extent that additional information provided.