REACT CROSS
EX 11 O'Sheasy

ICC Docket No. 13-0387

Commonwealth Edison Company's Response to
Illinois Industrial Energy Consumers ("IIEC") Data Requests
IIEC 3.01 – 3.08
Date Received: September 5, 2013
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Witness O' SHEASY
Date 9-25-13 Reporter KK

REQUEST NO. IIEC 3.03:

Regarding Mr. O'Sheasy's testimony at page 7, line 146 through page 8, line 152:

a. Please explain in detail Mr. O'Sheasy's experience and the research that CA conducted which led him to the conclusion that Mr. Stephens' approach is not commonly used in the electric industry. Please provide all documentation or workpapers supporting this answer.

b. Is it Mr. O'Sheasy's understanding that the approach described by Mr. Stephens and/or Mr. Terhune is not used by any other utility in the U.S.? If so, please provide the full basis for this understanding, and provide all supporting documentation or workpapers.

c. Is the term "allocation by exclusion" as used by Mr. O'Sheasy at page 7, line 149 of his testimony a common term used in cost of service analyses or is it a term coined by Mr. O'Sheasy for use in the context of his rebuttal testimony in this case? Please explain your answer fully, and provide all supporting documentation or workpapers.

d. Is the term "path of service" as used by Mr. O'Sheasy at page 7, line 149 of his testimony a common term used in cost of service analyses or is it a term coined by Mr. O'Sheasy for use in the context of his rebuttal testimony in this case? Please explain your answer fully, and provide all supporting documentation and workpapers.

RESPONSE:

a. Mr. O'Sheasy's conclusion is based upon his over thirty years of experience working in cost of service review and development and testifying as an expert witness on such subject matter. His conclusions are reinforced by the CA Cost Allocation Survey (ComEd Ex. 3.09). These findings were discussed in Mr. O'Sheasy's Rebuttal Testimony (ComEd Ex. 11.0, 8:162 - 10:196). The following is a list of rate cases in which Mr. O'Sheasy has filed testimony as a cost of service expert witness:

1. Docket No. 31958-U before the Georgia Public Service Commission on behalf of Georgia Power Company as their expert witness on Cost of Service.
2. Docket No. 25060-U before the Georgia Public Service Commission on behalf of Georgia Power Company as their expert witness on Cost of Service.
3. Docket No. 010949-EI before the Florida Public Service Commission on behalf of Gulf Power Company as their expert witness on Cost of Service.
4. Docket No. 881167-EI before the Florida Public Service Commission on behalf of Gulf Power Company as their expert witness on Cost of Service.

5. Docket No. 050078-EI before the Florida Public Service Commission on behalf of the Commercial Group as their expert witness on cost of service and rate design.
6. Docket No. 110138-EI before the Florida Public Service Commission on behalf of Gulf Power Company as their expert witness on Cost of Service.
7. Case: FTC-02/09 BL&P-RADJ before the Barbados Fair Trading Commission on behalf of Barbados Light & Power Company as their expert witness on cost of service and rate design.
8. Docket No. 130140-EI before the Florida Public Service Commission on behalf of Gulf Power Company as their expert witness on Cost of Service.
9. Docket No. 36989 before the Georgia Public Service Commission on behalf of Georgia Power Company as their expert witness on Cost of Service.

b. No, Mr. O'Sheasy is not asserting that no other utility in the U.S. uses the approach described by Mr. Stephens and/or Mr. Terhune.

c. This is simply a term "coined" by Mr. O'Sheasy to describe the overall concept.

d. This is simply a term "coined" by Mr. O'Sheasy to describe the overall concept.