

DIRECT TESTIMONY

of

Joan Howard  
Consumer Policy Analyst

Consumer Services Division  
Illinois Commerce Commission

Reconciliation of Revenues Collected Under Rider UF with Uncollectible Costs  
Incurred

Commonwealth Edison Company

Docket No. 13-0497

May 20, 2014

1 **Witness Identification**

2 **Q. Please state your name and business address.**

3 A. My name is Joan Howard. My business address is 527 East Capitol  
4 Avenue, Springfield, Illinois 62701.

5

6 **Q. By whom are you employed and in what capacity?**

7 A. I am employed by the Illinois Commerce Commission (“Commission”) as  
8 a Consumer Policy Analyst in the Consumer Services Division. My  
9 responsibilities include development of rules and policies pertaining to  
10 consumer protection and consumer billing and payment practices; review  
11 of utility policies and practices; review of tariff filings, assisting division  
12 management in identifying and resolving consumer complaint trends; and  
13 evaluation of data recorded in the Division’s complaint tracking system.

14

15 **Q. What is the purpose of your testimony in this proceeding?**

16 A. The purpose of my testimony is to report the results of my review of the  
17 prudence and reasonableness of the actions of Commonwealth Edison  
18 Company (“ComEd” or the “Company”) to pursue minimization and  
19 collection of collectibles during the reconciliation period, June 1, 2012  
20 through May 31, 2013, of Rider UF, Uncollectible Factors Rider (“Rider  
21 UF”) and to make any recommended determinations for the Commission  
22 to make regarding adjustments to practices pursuant to the requirements  
23 of Section 16-111.8(c).

24

25 **Q. Are you sponsoring any schedules as part of your direct testimony?**

26 A. No.

27

28 **Testimony Concerning Section 16-111.8, Automatic Adjustment Clause**

29 **Tariff: Uncollectibles**

30 **Q. What is the result of your review of the prudence and**  
31 **reasonableness of the Company's actions to pursue minimization**  
32 **and collection of collectibles during the period, June 1, 2012 through**  
33 **May 31, 2013, pursuant to Section 16-111.8(c) of the Act?**

34 A. Upon reviewing the testimony of Company witness Jennifer V. Montague,  
35 concerning the Company's response to the Act's requirement that a utility  
36 with a tariff authorized by Section 16 -111.8(c) pursue minimization of and  
37 collection of uncollectibles through a list of six activities (ComEd Ex. 3.0,  
38 pp. 10-26), the Company's actions in this regard generally appear to be  
39 prudent and reasonable. In summary, as required by Section 16-111.8(c),  
40 ComEd's actions include (1) identifying customers with late payments; (2)  
41 contacting the customers in an effort to obtain payment; (3) providing  
42 delinquent customers with information about possible payment options; (4)  
43 serving disconnection notices; (5) implementing disconnections based on  
44 the level of uncollectibles; and (6) pursuing collection activities based on  
45 the level of uncollectibles.

46

47 **Summary of Conclusions and Recommendations**

48 **Q. Do you have recommended determinations for the Commission to**  
49 **make regarding adjustments to ComEd's implementation of**  
50 **practices required by Section 16-111.8(c)?**

51 A. I do not have any recommended determinations for the Commission to  
52 consider regarding the Company's minimization of uncollectibles and  
53 collection of uncollectibles.

54

55 **Q. Do you have any other observations to make?**

56 A. Yes, with regard to the description of ComEd's actions pertaining to  
57 serving disconnection notices, Ms. Montague does not address the  
58 Company's practice with respect to customers who are not eligible for  
59 disconnection of service during the winter heating season. Electric and  
60 gas public utilities are prohibited from disconnecting service to any  
61 residential customer who is a participant under Section 6 of the Energy  
62 Assistance Act of 1989 for nonpayment during the period from December  
63 1 through and including March 31 of the immediately succeeding calendar  
64 year. Electric and gas public utilities are prohibited from disconnecting  
65 service to certain military personnel in military service. ComEd is  
66 prohibited from disconnecting service to a residential space-heating  
67 customer for non-payment from December 1 through March 31. It is my

68 understanding that ComEd does not disconnect electric service to the  
69 above specified customers during times when disconnection is prohibited.  
70 It does not seem appropriate for the utility to send a final notice prior to  
71 disconnection to a customer who is not eligible for disconnection during  
72 the particular time covered by the notice. However, I believe it is  
73 appropriate for the Company to issue other forms of notice of non-  
74 payment that do not warn of imminent disconnection of service during  
75 periods of time when the Company is prohibited from disconnecting  
76 service for nonpayment.

77

78 **Q. Does this conclude your prepared direct testimony?**

79 A. Yes, it does.