

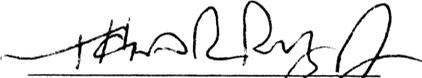
**RUMSEY AFFIDAVIT**

THOMAS R. RUMSEY, being first duly sworn on oath, states that:

- 1) I am over the age of 18 and of sound mind. I have personal knowledge of the facts set forth in this affidavit. I could competently testify to the facts set forth herein if called to do so at hearing. Further, I have attached to my affidavit certain records on which I rely and that were kept by ComEd in the regular course of business. These two (2) records are marked separately as: Rumsey Aff. Attachment A-1.0; and Rumsey Aff. Attachment A-2.0. I swear that each of these copies is a true, complete and correct copy of the original ComEd business record in ComEd's systems.
- 2) While now retired, I was employed by Commonwealth Edison Company (ComEd) as a Meter Mechanic Special and, with over 23 years in this position, have tested over 60,000 meters. Prior to that, and for about six years, I worked for ComEd as a meter reader. I served as Chairman of the Field and Meter Services (FMS) safety council for six (6) years. Among other things, I wrote about 20 training manuals for use by ComEd meter shop employees and also participated in writing two (2) manuals for the Training Dept. for meter reader training. I am knowledgeable and experienced with all types of ComEd meters, the programming of the meters and additional required meter installation equipment. From many years of training and experience, I know how different types of meters operate and register usage, what appliances are required on-site and what is necessary to have actual meter usage be billed. I am familiar with the subject meter, i.e., Meter No. 141362866 and my attachments concern this meter.
- 3) Meter No. 141362866, the LAZ meter here, is a recorder meter. This fact is shown on Rumsey Aff. Attachment A-1.0 both in the highlighted portion at the top right and also in the last box on the left. The meter type listed for this meter (D3LS6R) ends in an "R" and this designation indicates a recorder meter. A recorder meter holds usage information in an internal memory in 1/2 hour increments used during a billing cycle.
- 4) Meter No. 141362866 is a transformer rated meter. A transformer meter means that the customer is using more amps (current) than any of ComEd's meters can handle, such that a current transformer (C.T.) is required for each of the three phases (or "hot wires") supplying power to the customer. Energy/current flows through the CT and then into the meter (as opposed to most meters on homes which are "self-contained," so the current flows directly through the meter).
- 5) ComEd brings out a CT for the customer's electrician to install. After the customer installs the CT; a ComEd technician will come out to the premises, install the meter and connect the CT to the meter fitting.

- 6) Once the meter is installed and connected to the C.T.'s, the ComEd technician will enter the CT type and its size within ComEd's Customer Information Management System ("CIMS") which will automatically generate the multiplier i.e., meter constant, into the billing system. A meter constant/multiplier is needed for billing on a transformer rated meter because a metering CT steps down the current being used to the meter at a certain ratio. For example, in a situation where that ratio is 3000:5 amps or 600:1, it means that for every 600 kWhs used by the customer only 1 kWh is registered on the meter. So, in this example, a meter constant or what I also refer to as a multiplier, is needed in order to bill the customer's actual usage.
- 7) The meter constant/multiplier is not something that is programmed into ComEd's meters. This is because, at the time a meter is tested for accuracy or programmed, there is simply no way of knowing what size or type of C.T.s will be associated with the meter on the customer's premises. The actual C.T. sizes and types are to be confirmed, and this data entered into CIMS, by the ComEd Technician who is installing the meter. Regardless of whether ComEd, or the meter manufacturer, tests/programs the meter (and the manufacturer programs according to ComEd's specifications), the only way that a meter constant/multiplier will be input into ComEd's billing systems is if a ComEd technician enters the required C.T. data into CIMS. In short, the meter constant/multiplier is not a meter function.
- 8) An electronic business record that I had personally printed out from ComEd's systems for this case shows that Meter No. 141362866 was installed at LAZ's premises on December 14, 2007. See Rumsey Aff. Attachment A- 2.0. I did not find any records to show who actually installed the meter on December 14, 2007 or the cause of the CT information not being properly recorded into CIMS at that time.
- 9) ComEd's records show that the meter manufacturer, Elster Manufacturing, conducted accuracy tests on Meter No. 141362866. Please refer again to Rumsey Aff. Attachment A- 1.0. It further electronically programmed each of the LAZ meters (including the subject meter) to conform to ComEd's standards prior to shipment. But, as I have explained above, neither ComEd's programming requirements nor those of the manufacturer, include a meter constant because a constant/multiplier is not something that is programmed into ComEd's meters.
- 10) This same ComEd record, Rumsey Aff. Attachment A-1.0 also shows the test results for Meter No. 141362866 on October 25, 2007. The test results, set out on the right hand of this record are: 100.01% in Full Load, 100.01% in Power Factor and 100.00 % in Light Load. Across from this testing data, and on the left, is a checkmark with the term "In Limits." This means that the testing results for Meter No. 141362866 fell with the accuracy limits set by the Illinois Commerce Commission in its 410.150 meter rules.

- 11) The facts I stated above, show that neither meter testing nor any type of post-installation meter inspection would reveal the incorrectness of the LAZ or any other customer's meter constant (as this is a matter based solely on the entry of current transformer specifics and other information into ComEd's CIMS for billing purposes). Stated yet another way, a "meter constant" resides in the billing system and not in a meter.
- 12) This ends my affidavit.

  
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 Thomas R. Runsey

SUBSCRIBED and SWORN to before me  
 this 29<sup>th</sup> day of June, 2015.

  
 \_\_\_\_\_  
 Notary Public



AMS2000 - Primary Stock Header W362866

File Production Editors Security Misc. Mainframe Functions Help

Reader	Shop Transfer	Shop Tests	Reg. Prog. Hist	Observation	Purchase Hist
Inventory	Xfer Hist	Standard Test	Tamper Hist.		Retirement
	Checkin Hist	Field Test	Test Hist.		

Company Number: W362866  
 Equipment No.: 141362866 Alternate:   
 Prev. Company No.:   
 Prev. Equip. No.:   
 Company Code: CRC  
 Mfg Code: W  
 Device Type Code: EMT  
 Current Location Code: CN  
 In House Status: 0  
 Special Test Code:   
 Special Note 1:   
 Special Note 2:   
 Comments:

PO Group Number: 2007-0184  
 Group Draw #: 222  
 Upload Date: 10/31/2007  
 Download Date: 12/15/2007  
 Change Date: 12/15/2007

Suppress  
 Hold  
 Inventory  
 In Limits  
 Repair Device

Shop Test Header W362866

Close	Curr / Hist Cycle #	Special Test Meter #	Old Meter #	Total # Tests	# Out Lr
Create					
Save					
Delete					
Next Page					

W362866 W EMT As Found Test Data

Start Date/Time:	10/25/2007 00:00	Demand Accy:	Pass
Stop Time:	00:00	Series	Left Middle Right
Tester ID:	MFG	Full Load:	100.01 100.00 100.00 100.00
Testboard R:	0	Power Factor:	100.01 .00 .00 .00
Dial Reading:	00000	Light Load:	100.00 .00 .00 .00
In Limits?:	In Limits		

Meter Type: 037553 Register Number:   
 Meter Size Code: 000026 Register Ratio:   
 Setup Code: CE1 Register Firmware Revision: 0303LI  
 Register Mfg: W Register Software Revision: 0303LI  
 Comments:

Save Create Delete Close

Ready

Start Inbox - Microsoft Outlook AMS2000 - Primary ... CCLP 000099 2:05 PM

A3

EQUIPMENT	METER_T	METER_SIZE	CUR	INSTALL_DATE	REMOVE_I	ACCOUNT_N	CUSTOMER_NAME	CUSTOMER_ADDRESS
141362866	D3LS6R	000026	C	12/14/2007		2931008045	LAZ PARKING	25 N MICHIGAN AVE *BLDG 111 CHICAGO IL 60601