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Revenue Neutral Tariff Changes Related to Rate Design

(City Exhibit 2.1)
6 pages incl. cover

ICC Docket No. 17-0049

**Commonwealth Edison Company's Response to
The City of Chicago ("COC") Data Requests
COC 2.01 - 2.07**

Date Received: April 14, 2017

Date Served: April 24, 2017

REQUEST NO. COC 2.01:

Please provide all non-confidential portions (using redactions if necessary) of

- (a) the underlying workpapers and data for ComEd's testimony based on its examination of peak demand on its system feeders (see ComEd Ex. 2.0 at lines 1412-1510); and
- (b) ComEd's examination of peak demand on its system feeders (referenced in ComEd Ex. 2.0 at lines 1412-1510) -- the "Feeder Study" -- along with supporting workpapers and data.

RESPONSE:

- (a)-(b) On April 21, 2017 ComEd Supplemented the workpapers for ComEd's Initial Filing in ICC Docket No. 17-0049 to provide PUBLIC versions of the work papers related to the feeder analysis in ComEd Ex. 2.0 in their native Excel files with the Confidential information redacted. The following workpapers were sent by Laura Coggeshall to all parties of record in this matter via e-mail:

- WP - ComEd Ex 2.0 (PUBLIC) - 2014 Peak Feeder Load Charts.xlsx
- WP - ComEd Ex 2.0 (PUBLIC) - 2015 Peak Feeder Load Charts.xlsx
- WP ComEd Ex 2.0 (PUBLIC) - Review Feeder Peaks When Lighting is On.xlsx

ICC Docket No. 17-0049

**Commonwealth Edison Company's Response to
City of Chicago ("COC") Data Requests
COC 1.01 - 1.28**

Date Received: February 17, 2017

Date Served: March 3, 2017

REQUEST NO. COC 1.03:

The supporting data and studies for Mr. Leick's statements regarding peak demand occurrences, e.g., pages 80-86 of ComEd Ex. 2.0, do not appear to be included in ComEd's work papers.

- (a) Please provide the supporting data and analyses (in functional spreadsheets or original format) for the feeder study referenced. If the requested material is included in the work papers, please provide the location of the data and analyses.
- (b) Please provide the underlying data and analyses that support his statement at ComEd Ex. 2.0, 1483 regarding street lighting.
- (c) Please identify -- in the material responding to subsection (b) of this request or separately -- the specific feeders that provide the basis for Mr. Leick's statement at line 1483. Provide the geographic coverage (by municipality and zip code(s)) of each identified feeder.

RESPONSE:

- a-c. See ComEd's Response to City of Chicago Data Request COC 1.02.

The requested data is available in the work papers titled: "WP - ComEd Ex 2.0 - (Confidential) 2014 Peak Feeder Load Charts.xlsx", "WP - ComEd Ex 2.0 - (Confidential) 2015 Peak Feeder Load Charts.xlsx" and "WP ComEd Ex 2.0 (Confidential) Review Feeder Peaks When Lighting is On.xlsx".

ICC Docket No. 17-0049

**Commonwealth Edison Company's Response to
City of Chicago ("COC") Data Requests
COC 1.01 - 1.28**

Date Received: February 17, 2017

Date Served: March 3, 2017

REQUEST NO. COC 1.05:

Refer to ComEd Ex. 2.0 at 73:1234 ("Base ECOSS provides a specific example of the computation of a CP allocator. In determining the CP-ALL allocation factors for the individual delivery classes the total CP demand on ComEd's system is 21,687,839 kW.").

- (a) Please explain whether load research techniques that have been used in the past were used to compute the CP or whether AMI data were used.
 - i) Specifically, was the load data used in this case derived from actual AMI readings, from sampling, or from other load research?
- (b) If the source was not exclusively actual data from AMI meters, provide:
 - i) the load studies and data on which ComEd's proposal and testimony are based; and
 - ii) a detailed explanation of the methodology, assumptions, and sampling locations.
- (c) If the data are actual readings taken from AMI meters, provide:
 - i) the time period and geographic coverage of the meters from which the data were taken;
 - ii) a break-out showing the numbers (or percentages) of the meters in each class; and
 - iii) the number of meters in the City of Chicago and the percentage of the total that number represents.
- (d) If the data were derived from a sample of less than all AMI readings, provide a detailed explanation of the sampling methodology, assumptions, and geographic coverage;
- (e) If AMI data were used, please explain why this change was not explained in the testimony.
- (f) Please provide (or identify within previously provided responses) the load research or AMI data that were used to compute CP and NCP for residential ratepayers and watt hour ratepayers. Please explain why the residential load research was not discussed in the testimony.

RESPONSE:

- (a) The work papers used to determine the CP and NCP cost allocators used in this proceeding are the same work papers provided in ICC Docket No. 16-0259, ComEd's 2016 Formula Rate Update ("FRU"). In ICC Docket No. 16-0259, Mr. Leick's direct testimony discusses the use of AMI data to determine the residential CPs and NCPs (*See*, ICC Docket No. 16-0259, ComEd Ex. 7.0, 7:139 - 9:181). Furthermore, ComEd's Schedule E-7 in ICC Docket No. 16-0259 further describes the development of ComEd's profiles used to determine the CP and NCP cost allocators. These documents are publicly available via the ICC's e-Docket system. ComEd had limited AMI data available for the Watthour and Small Load Delivery Classes in its 2016 FRU but intends to consider using AMI data in its 2017 FRU filing.
- (b) See ComEd's response to subpart (a), above.
- (c) ComEd used a random sample of premises distributed by their Maximum Monthly Usage ("MMU") percentile ranking that had an AMI meter for all of 2015 (*See*, ICC Docket No. 16-0259, Leick Dir., ComEd Ex. 7.0, 7:139 - 9:181). The following distribution of AMI meters are in the samples:

	Inside Chicago	Outside Chicago	Total	% Inside Chicago
Single Family without Electric Space Heat:	930	1,570	2,500	37.2%
Multi Family without Electric Space Heat:	1,497	1,003	2,500	59.9%
Single Family with Electric Space Heat:	104	396	500	20.8%
Multi Family with Electric Space Heat:	629	1,871	2,500	25.2%

- (d) See ComEd's response to subpart (a), above.
- (e) This change was addressed in ComEd's 2016 FRU filing.
- (f) See ComEd's response to subpart (a) and subpart (e), above.

ICC Docket No. 17-0049

**Commonwealth Edison Company's Response to
City of Chicago ("COC") Data Requests
COC 1.01 - 1.28**

Date Received: February 17, 2017

Date Served: March 3, 2017

REQUEST NO. COC 1.20:

Refer to ComEd Ex. 2.0 at 86:1469 ("The data further indicates that feeder kW peaks do not even occur at the same hour or season and can be different each year depending on how the local kW loads are set by the customers served from each feeder.").

- (a) Please explain in detail how ComEd engineers size a system when there is uncertainty with respect to when peak loads occur. For example, do the engineers estimate different loads in different seasons?
- (b) For each of the feeders that had different loads in different seasons or months (in the years examined for testimony or discovery in this case), please provide the month of the highest peak load. For example, if one feeder had its 2014 peak load in January and its 2015 peak load in 2015 in August, provide the peak load for that feeder that was the highest peak load.

RESPONSE:

ComEd objects to this request to the extent it requests analyses or studies that ComEd has not conducted. Subject to and without waiving the foregoing specific objection, or any of ComEd's General Objections, ComEd responds as follows:

- (a) ComEd will consider the loads for different seasons if the customer provides the information and there is enough load to warrant such consideration.
- (b) See ComEd's Response to City of Chicago Data Request COC 1.02. The requested data is available in the work papers titled: "WP - ComEd Ex 2.0 - (Confidential) 2014 Peak Feeder Load Charts.xlsx", "WP - ComEd Ex 2.0 - (Confidential) 2015 Peak Feeder Load Charts.xlsx".