

Direct Testimony  
of  
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Illinois Commerce Commission

Petition for the Establishment of Performance Metrics under Section 16-108.18(e) of the  
Public Utilities Act.

Commonwealth Edison Company

Docket No. 25-0514

July 28, 2025

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**Attachments**

**Staff Exhibit 7.01 - ComEd’s Response to COFI DR 2.01**

1    **I. Introduction**

2           **A. Witness Qualifications**

3    **Q. Please state your name, business address, and job title.**

4    A. My name is Latifat Moradeyo. My business address is 527 East Capitol Avenue,  
5       Springfield, Illinois 62701. I am employed by the Illinois Commerce Commission  
6       ("ICC" or "Commission") as a Policy Analyst in the Public Utilities Bureau's Integrated  
7       Distribution Planning Division.

8    **Q. What are your responsibilities within the Commission's Integrated Distribution**  
9       **Planning Division?**

10   A. My responsibilities include researching and analyzing electric distribution planning  
11       matters and delivering testimony on policy matters, with a particular focus on equity  
12       concerns. My role encompasses formulating data requests, pinpointing key issues,  
13       and crafting well-supported conclusions and recommendations. These are backed  
14       by factual evidence and proper documentation, ensuring compliance with regulatory  
15       principles, relevant laws, and regulations.

16   **Q. Have you previously provided testimony in a Commission proceeding?**

17   A. Yes. I have testified before the Commission on cases directly related to my  
18       responsibilities, including the Multi-Year Integrated Grid Plans dockets for both  
19       Commonwealth Edison Co. ("ComEd"), (Docket Nos. 22-0486/23-0055/24-0181  
20       (Cons.)) and Ameren Illinois, d/b/a Ameren Illinois Co. ("Ameren"), (Docket Nos.  
21       22-0487/23-0082/24-0238 (Cons.)) and the Beneficial Electrification Plans for both

ComEd (Docket Nos. 24-0484/24-0577 (Cons.) and Ameren 24-0494/24-0578 (Cons.)).

**Q. Please describe your educational background.**

A. I hold a Master of Law degree from the University of Illinois, Urbana–Champaign, and a Bachelor of Law degree from the University of Ilorin, Ilorin, Nigeria.

**Q. Please describe your professional experience prior to your employment at the ICC.**

A. Before joining the Commission Staff (“Staff”) in April 2023, I worked as an attorney in various law offices. Some of my duties included conducting legal research, representing clients in court, interviewing clients, writing briefs, documenting contracts, and analyzing data.

**B. Purpose of Testimony**

**Q. What is the purpose of your testimony?**

A. The purpose of my direct testimony is to respond to Commonwealth Edison Company’s (“ComEd” or the “Company”) Petition for the Establishment of Performance Metrics under Section 16-108.18(e) of the Public Utilities Act (“Act”) and supporting testimony filed by ComEd. Specifically, I will respond to ComEd’s testimony related to its proposed Performance Metric 5 (“PM5”): Affordability and the proposed Tracking Metric for Disconnections for nonpayment in the 20 ZIP codes targeted under the 2024-2027 affordability metric. Staff witness Hamidu will address the net benefits component of PM5 in Staff Exhibit 8.0.

**Q. Are you offering any legal opinions in your direct testimony?**

44 A. No, I am not. While I may offer my understanding of certain provisions of the Illinois  
45 Public Utilities Act (the “Act”), 220 ILCS 5 *et. seq.*, I am not employed by the  
46 Commission as an attorney, and none of my testimony offers any legal opinion.

47 **C. Attachments**

48 **Q. Are you sponsoring any Exhibits with your testimony?**

49 A. Yes, I attached the following Exhibit to my testimony:

50 Staff Ex. 7.01 ComEd’s Response to COFI DR 2.01

51 **D. Summary of Recommendations**

52 **Q. Please summarize your recommendations.**

53 A. I have the following recommendations:

54 1. The Commission should direct ComEd to base its selection of ZIP codes for the  
55 2028–2031 Affordability Performance Metric on the top 20 ZIP codes with the highest  
56 disconnection rates, regardless of whether those ZIP codes were included in PM  
57 Plan 1.

58 2. I recommend ComEd increase the minimum number of customers threshold per  
59 ZIP code from 50 to 150 customers. This is to ensure each included ZIP code has  
60 a sufficiently large customer base to support the goal of capturing a wider  
61 ratepayer base and maximizing the impact of the metric ComEd should provide in  
62 rebuttal how it intends to use the data from the new proposed Tracking Metric for  
63 Disconnections, (tracking metric 32 or “TM32”) and whether the information will  
64 contribute to improve affordability and assist customers in reducing disconnections  
65 in those PM Plan 1 selected ZIP codes.

66 **II. Affordability Performance Metric**

67 **Q. Describe the standard established by the Act for reviewing ComEd's**  
68 **proposed Affordability Performance Metric.**

69 A. Section 16-108.18(e)(2)(A)(iv) states:

70 Achieve affordable customer delivery service costs, with particular  
71 emphasis on keeping the bills of lower-income households, households  
72 in equity investment eligible communities, and households in  
73 environmental justice communities within a manageable portion of their  
74 income and adopting credit and collection policies that reduce  
75 disconnections for these households specifically and for customers  
76 overall to ensure equitable disconnections, late fees, or arrearages as  
77 a result of utility credit and collection practices, which may include  
78 consideration of impact by ZIP code.

79 220 ILCS 5/16-108.18(e)(2)(A)(iv).

80 **Q. Describe ComEd's proposed PM5.**

81 A. The proposed PM5 is designed to support residential customers in 20 specific ZIP  
82 codes within ComEd's service territory that have experienced the highest rates of  
83 disconnections due to nonpayment over a three-year period (2024–2026).  
84 (ComEd Ex. 1.01, 15.) ComEd aims to reduce disconnections by 10% annually,  
85 measured year-over-year, during the four-year metric period (2028–2031). Id. The  
86 metric will assess whether there is a 10% aggregate reduction across all 20 ZIP  
87 codes combined. Id. The Company retains its commitment not to achieve this  
88 metric by simply allowing arrearages to grow in the proposed 20 ZIP codes as a  
89 result of reduced disconnections. (ComEd Ex. 5.0, 4.)

90 **Q. How are the ZIP codes selected?**

91 A. In alignment with the approved Affordability Performance Metric in the first  
92 Performance Metric docket ("PM Plan 1"), ComEd proposes to identify 20 new

target ZIP codes for the 2028-2031 performance period. Id. at 3; Commonwealth Edison Co., ICC Final Order, Docket No.22-0067, 163-164, 168 (Sep. 27, 2022) (“PM Plan 1”). The selection will be based on ZIP codes with the highest disconnection rates for nonpayment from 2024-2026 while excluding any ZIP codes with fewer than 50 customers. (ComEd Ex. 5.0, 3.) Furthermore, ComEd proposed to exclude from the new metric any ZIP codes already included in the current Affordability Performance Metric under PM Plan 1, even if those same ZIP codes remain among those with the highest disconnection. Id. at 3-4. However, the Company proposes to monitor the number of disconnections for nonpayment in the PM Plan 1 selected 20 ZIP codes as a new tracking metric, TM32. (Id. at 10.) It is not clear how ComEd intends to use such data. In my opinion, it is important to understand what role the data from continuing to monitor the PM Plan 1 selected ZIP codes will play in supporting the affordability goal of PM5. Specifically, ComEd needs to provide information on whether the data from TM32 will inform future program design, resource allocation, or evaluation of the future PM plan outcomes. I recommend ComEd provide in rebuttal how it intends to use the TM32 data for PM Plan 2. For example, ComEd should describe whether and how the information will contribute to improving affordability and assisting customers in reducing disconnections in those PM Plan 1 selected ZIP codes.

**Q. Did the Company provide a rationale for excluding the PM Plan 1 ZIP codes from the proposed affordability metric, even if those ZIP codes continue to have the highest disconnection rates?**

115 A. ComEd predicts the ZIP codes targeted under PM Plan 1 will likely no longer have  
116 the highest disconnection rates going forward. Id. at 3. Additionally, the Company  
117 stated that continuing to drive down disconnections in those same ZIP codes could  
118 hinder its ability to perform collections in those areas. Id. As a result, ComEd  
119 proposes to exclude those ZIP codes from the new performance metric and  
120 instead proposes to track these ZIP codes separately. Id. at 10.

121 **Q. Did ComEd explain why it believes those ZIP codes will no longer have the**  
122 **highest disconnection rates going forward?**

123 A. No.

124 **Q. Did ComEd explain why it believes continuing to drive down disconnections**  
125 **in the same ZIP codes could hinder its ability to perform collections in those**  
126 **areas?**

127 A. In response to COFI DR 2.01, ComEd states that meeting 10% annual  
128 disconnection target in the 20 ZIP codes from 2024-2027, will amount to a 34%  
129 cumulative reduction, and if the target is extended through 2031, it would result in  
130 a 57% cumulative reduction. (Staff Ex. 7.01, 2.) However, the Company cannot  
131 guarantee customer participation in assistance programs to reduce disconnection.  
132 Id. if participation is insufficient, the Company may still be bound by the  
133 disconnection reduction target, which could limit its ability to perform  
134 disconnections for nonpayment and hinder its ability to collect arrears. Id.

135 **Q. Do you agree with ComEd's approach?**

136 A. No. While I support ComEd's proposal to identify new ZIP codes distinct from those  
137 selected in the PM Plan 1 docket, I do not agree with the automatic exclusion of



138 PM Plan 1 ZIP codes that continue to rank among those with the highest  
139 disconnection rates. (ComEd Ex. 5.0, 3-4.)

140 **Q. Please explain.**

141 A. ComEd has not presented evidence that the disconnections in the ZIP codes  
142 targeted for the PM Plan 1 Affordability Performance Metric will decline. The  
143 automatic exclusion of previously targeted ZIP codes may overlook communities  
144 where affordability challenges persist, especially if those areas continue to rank  
145 among those with the highest disconnection rates. Furthermore, I am concerned  
146 that ComEd's decision to exclude PM Plan 1 ZIP codes will become less  
147 challenging to achieve, enabling ComEd to earn basis points that may be  
148 unmerited. If the Company simply selected the top 20 ZIP codes with the highest  
149 disconnection rates-- regardless of their inclusion in PM Plan 1-- the resulting data  
150 may skew ComEd's achievement of PM5. This raises concerns that the exclusion  
151 of ZIP codes in PM Plan 1 may be motivated more by a strategic advantage of  
152 achieving targets than by a commitment to long-term affordability improvements.

153 **Q. What do you recommend?**

154 A. I recommend the Commission direct ComEd to select ZIP codes for the 2028--  
155 2031 Affordability Performance Metric of the top 20 ZIP codes with the highest  
156 disconnection rates, regardless of their inclusion in PM Plan 1. ZIP codes that  
157 continue to experience high disconnection rates should remain eligible for inclusion  
158 to ensure that affordability challenges in the most impacted communities are  
159 addressed consistently. Furthermore, I recommend that ComEd increase the  
160 minimum number of customers threshold per ZIP code from 50 to 150 customers.

This adjustment would help ensure that each included ZIP code has a sufficient customer base to support the goal of capturing a wider audience and maximizing the impact of the metric.

**Q. Describe the data collection and calculation methods of this metric.**

A. The Company will utilize the monthly credit and collection reports publicly available on the ICC website<sup>1</sup> that provide disconnections by ZIP codes. (ComEd Ex. 5.0, 6.) To assess its performance under the affordability metric, ComEd will calculate the total number of residential disconnections for nonpayment across the new 20 targeted ZIP codes during a 12-month performance period. Id. This total will then be compared to the baseline target. For each calendar year, the aggregated disconnection count will be measured against established incentive and penalty thresholds to determine whether ComEd meets, exceeds, or falls short of its performance targets. Id. at 4.

**Q. What performance target did the Company set for this metric?**

A. The Company has set a performance target requiring a minimum annual reduction of 6.7% in residential disconnections, compared to the prior year, to qualify for an incentive. (ComEd Ex. 5.0, 6.) To establish the baseline and target values, ComEd will use residential disconnection data from 2024 through 2026 to identify 20 new eligible ZIP codes. Id. at 7. The total number of disconnections in those ZIP codes in 2026 will serve as the baseline for measuring future performance. Id.

**Q. Did ComEd allocate any basis points for this metric?**

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<sup>1</sup> <https://www.icc.illinois.gov/industry-reports/credit-collections-and-arrearages-reports>

182 A. Yes, ComEd proposed an allocation of the +/-5 basis points to return on equity  
183 ("ROE") for this metric. Basis points will be calculated using a linear approach,  
184 rounded to the nearest hundredth. (ComEd Ex. 1.01, 17.) The incentive or penalty  
185 will equal the percentage of the target achieved multiplied by the maximum  
186 amount. Id.

187 **Q. Do you have any concerns with the basis point allocated to this metric?**

188 A. No, I do not have concerns with the +/-5 basis point allocation. I believe that it is  
189 significant enough to incentivize the Company to meet the goals of this metric while  
190 not being so high as to misalign incentives. This position aligns with the  
191 Commission's decision in PM Plan 1, where it allocated 5 basis points to this  
192 Metric. (Final order, 50.) As noted in the final Order of PM 1, the Commission  
193 found that a 5-basis point incentive represents a significant motivator for the  
194 Company to achieve the goals of this metric. Id. at 170. The Commission also  
195 recognized the potential positive impact of achieving this metric on EJ and R3  
196 communities, as well as the overall affordability implications for all customers.  
197 Therefore, the allocation is appropriate given the metric's objectives. Id.

198 **Q. Did ComEd propose a new tracking metric?**

199 A. Yes. The Company has proposed a new tracking metric, TM32, that will monitor  
200 the number of disconnections for nonpayment in the 20 ZIP codes covered by the  
201 PM Plan 1 performance period from 2024 through 2027. Id. at 44. This metric will  
202 utilize data from the monthly credit and collection reports available on the ICC  
203 website. Id.

204 **Q. Do you have any concerns with the affordability tracking metric?**

205 A. Yes. As previously discussed, the Company did not provide adequate information  
206 on the role that the data from TM32 will play in supporting the long-term affordability  
207 goal of PM5. Infra at 5. Therefore, I recommend that ComEd provide in rebuttal  
208 how it intends to use that data and whether the information will contribute to  
209 improving affordability and assisting customers in reducing disconnections in those  
210 PM Plan 1 selected ZIP codes.

211 **III. Conclusion**

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

213 A. Yes.

**ICC Docket No. 25-0514****Commonwealth Edison Company's Response to  
Community Organization and Family Issues ("COFI") Data Requests****COFI 2.01 – COFI 2.02****Date Received: July 8, 2025****Date Served: July 22, 2025****REQUEST NO. COFI 2.01:**

Re: ComEd's Affordability metric, as discussed in Mr. Bohn's testimony at page 3: Mr. Bohn states: "By reducing the number of disconnections for nonpayment by 10% annually in the 20 zip codes targeted by the affordability metric from 2024 to 2027, those zip codes will likely no longer have the highest disconnection rates. Additionally, if ComEd were to continue to reduce the disconnections in those zip codes, it would inhibit our ability to perform collections in those areas."

- a) How does or will the Company know the existing zip codes in the current Affordability metric "will likely no longer have the highest disconnection rates"?
- b) Is it the Company's testimony that disconnection activity cannot be improved in those 20 zip codes that are the target of the existing Affordability metric? If yes, please include any document, study or memorandum in the Company's possession that details this phenomenon.
- c) If the response to subpart (b) is no, will the Company include any or all of the existing zip codes in its new Affordability metric if disconnection data shows that any or all of those zip codes are still the zip codes with the highest disconnection rates?
- d) How would inclusion of any or all of the zip codes in the existing Affordability metric "inhibit our ability to perform collections in those areas"? Please include any document, study or memorandum in the Company's possession that details this phenomenon.

**RESPONSE:**

- a) While we cannot predict specific customer behavior, due to the efforts of this Affordability Metric, ComEd believes the disconnection rates in the 20 zip codes in the current metric will be reduced such that they will no longer be the zip codes with the highest rates for disconnection in the proposed metric.

In 2027, ComEd will perform analysis on the disconnection rates in all zip codes to determine the next 20 targeted zip codes for the Affordability Metric from 2028 to 2031. If there are zip codes from the original metric that remain in the top 20, ComEd will include them in the proposed tracking metric. ComEd plans to continue an outreach and education strategy that includes events for both Financial Assistance and Energy Efficiency programs, in areas which will have the largest impact. ComEd is always open to input and feedback that is intended to increase the impact of our outreach and education efforts.

- b) No, ComEd is not stating that disconnection activity cannot be improved in those 20 zip codes that are the target of the existing Affordability metric.
- c) See ComEd's response to subpart (a), above.
- d) ComEd meeting the 10% annual reduction target of the Affordability metric in the 20 targeted zip codes for 2024-2027 will result in a cumulative 34% reduction of disconnections for non-payment over the 4-year period. If ComEd were to continue to use the same targeted 20 zip codes for an additional 4-year period, that would result in a cumulative 57% reduction by the end of 2031. See the attachment labeled as COFI 2.01\_Attach 1 for the calculations.

ComEd cannot control whether customers within the targeted 20 zip codes in the current Affordability metric participate in customer outreach efforts to provide customers assistance to reduce arrearages and therefore disconnections. If customers do not participate in the customer assistance programs provided by ComEd to reduce arrearages in the target zip codes at the rate necessary to achieve a 57% reduction in disconnections, the metric would inhibit ComEd from performing disconnections in these zip codes, to address arrearages.