

Direct Testimony
of
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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 1.01 – ComEd’s Response to NKD Staff Data Request 1.01

I. Introduction

A. Witness Qualifications

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

A. My name is Justin Vargas. My business address is 160 N North LaSalle St., Suite C-800, Chicago, Illinois 60601. I am employed by the Illinois Commerce Commission (“ICC” or “Commission”) as a Cybersecurity and Risk Management Policy Advisor in the Office of Cybersecurity and Risk Management.

Q. What are your responsibilities within the Commission’s Office of Cybersecurity and Risk Management?

A. My responsibilities within the Office of Cybersecurity and Risk Management include reviewing utility and intervenor filings for cybersecurity and IT-related projects, Internal Tracking Numbers (ITNs,) and proposals. Along with my colleagues in the Office of Cybersecurity and Risk Management, we serve as subject matter experts on cybersecurity, IT, and risk management issues for Staff.

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

A. Yes, I have previously submitted testimony in docketed cases.

Q. Please describe your educational background.

A. I received a Juris Doctor at DePaul University, College of Law in 2021. I also received a Master of Science in Cybersecurity: Governance, Risk Management and Compliance from Jarvis College of Computing and Digital Media, at DePaul University in 2021.

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

- A. Prior to joining the Commission Staff ("Staff") I served as a Senior Legislative Counsel for the Mayor of Chicago where I worked on legislation covering a variety of topics including data privacy and its relation to the rights of residents in Chicago.

B. Purpose of Testimony

Q. What is the purpose of your direct 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 ("PM Plan 2"), 220 ILCS 5/16-108.18(e)(3), and supporting testimony filed by ComEd. Specifically, I will: 1) introduce each witness and the topic they will be testifying to; 2) address whether all future modifications to metrics should be addressed in future multi-year rate plan ("MYRP") dockets or set forth in a separate PM docket schedule; 3) recommend when and where the tracking metrics should be reported; and 4) determine whether the utility's proposed tracking metrics fall into each of the categories set forth in Section 16-108.18(e)(3).

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

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

C. Attachments

Q. Are you sponsoring any exhibits with your testimony?

A. Yes, the following exhibit is attached to my testimony:

Staff Exhibit 1.01 ComEd's Response to NKD Data Request 1.01

D. Summary of Conclusions and Recommendations

Q. Please summarize your conclusions and recommendations.

A. I recommend the Commission:

- a. memorialize the agreement between Staff and the Company regarding future PM updates;
- b. memorialize the agreement between the Company and Staff regarding the Company's proposed criteria around selection of an independent evaluator;
- c. re-affirm the evaluator independence protocols from the Final Order in Docket No. 22-0067. Commonwealth Edison Co., ICC Final Order, Docket No. 22-0067, 228 (Sept. 27, 2022) ("PM Plan 1");
- d. direct the Company to continue its practice of filing updates to its PM Plan 1 in Docket No. 22-0067 and, for years 2028-2031, the Company should file updates to its PM Plan 2 in this docket, 25-0514; and,
- e. direct the Company to continue to circulate the spreadsheets with the tracking metric data to the service list of that docket; and

- f. find the Company's thirty-two proposed tracking metrics fall within the categories outlined in Section 16-108(e)(3) and should be approved by the Commission.

II. Introduction of Witnesses

Q. Could you provide a list of the Staff witnesses that plan to testify in this docket and for what purpose they are testifying?

A. Yes. Please see below:

Michael McNally (Staff Exhibit 2.0) will address overall basis points and whether Staff agrees with the amount of basis points ComEd proposes to allocate to the PMs.

Sunday Balogun (Staff Exhibit 3.0) will address ComEd's proposed PM1 and PM2 concerning the resiliency and reliability metrics, as well as the newly proposed OSHA tracking metric ("TM31").

Daniel Ashbaugh (Staff Exhibit 4.0) will address the net benefits of ComEd's proposed resiliency and reliability metrics, as well as power quality.

David Brightwell (Staff Exhibit 5.0) will address ComEd's proposed PM3 concerning peak load reduction.

Jeanine Robinson (Staff Exhibit 6.0) will address ComEd's proposed PM4 concerning supplier diversity.

Latifat Moradeyo (Staff Exhibit 7.0) will address ComEd's proposed PM5 concerning affordability, as well as the newly proposed tracking metric 32 ("TM32") to measure disconnections for nonpayment in each of the specific 20 ZIP codes being measured as part of the affordability metric from PM Plan 1 for 2024 through 2027.

Leonard Hamidu (Staff Exhibit 8.0) will address the net benefits of ComEd's affordability metric PM5.

David Rearden (Staff Exhibit 9.0) will address ComEd's proposed PM6 concerning interconnection.

Buren Ulziiburen (Staff Exhibit 10.0) will address ComEd's proposed PM7 concerning customer service.

Scott Struck (Staff Exhibit 11.0) will address the reporting of ex post net benefit calculations for each year.

III. Future Performance Metric Updates

Q. Did you consider whether all future modifications to the PMs should be addressed in future MYRP dockets or pursuant to a separate PM docket schedule?

A. Yes. Regarding the PM Plan 3 (2032-2035) filing and beyond, I considered whether future PM modifications should be addressed in future MYRP dockets or pursuant to a separate PM docket schedule. The statute allows the Commission to modify PMs in future MYRP dockets but does not require additional PM-specific

dockets or workshop processes beyond 2026. See 220 ILCS 5/16-108.18(d)(8); 220 ILCS 5/16-108.18(e)(4); 220 ILCS 5/16-108.18(e)(5). I evaluated scenarios where the Commission adopts PM targets in this docket that will affect future multi-year grid plan (“MYGP”) and MYRP filings. Assuming the Commission only revises PMs in MYRP dockets going forward, I note the following challenges: i) the statutory framework would have revised PMs filed in the MYRP docket three years before the MYIGP is filed; ii) approved PMs would be available two years before the MYIGP is filed; iii) and approved PMs would be available three years before they start to go into effect, with a gap of three to seven years between approval and implementation. Adopting PMs so far in advance of their effective date will result in reliance on outdated historical performance data, which will limit the ability to tailor the metrics to incentivize meaningful performance improvements for subsequent MYIGP and MYRP plans.

Q. To address the concern of having PMs adopted so far in advance of when they go into effect, what do you propose?

I propose the Commission adopt a future PM update schedule with the same sequencing as set forth in the statute for the first PM workshops and Docket. 220 ILCS 5/16-108.18(e)(6). As shown in the Table below, beginning with the second MYRP docket that is set for filing on March 6, 2027, future PM workshops and dockets should work in tandem with future MYGP and MYRP:

Years Covered By Filing	Topic	Start/Filing Date
2028-2031	Rate Plan 2 Docket	3/6/2027
	Utility-run PM3 Plan Workshops	Q3/Q4 2028

2032-2035	PM3 Plan Docket	1/20/2029
2032-2035	MYIGP 3 Docket	1/20/2030
2032-2035	MYRP 3 Docket	3/6/2031
	Utility-run PM4 Plan Workshops	Q3/Q4 2032
2036-2039	PM4 Plan Docket	1/20/2033
2036-2039	MYIGP 4 Docket	1/20/2034
2036-2039	MYRP 4 Docket	3/6/2035

Q. Why do you believe that separate PM workshops and dockets will benefit the Commission in future proceedings?

Separate proceedings in the form of workshops and formal dockets would allow Staff, Intervenor, and the Company with the opportunity to review the overall effectiveness of each PM and the Company's PM Plan's success prior to litigating future MYIGPs and MYRPs. Additionally, this would establish a predictable schedule for the Company, Staff, and Intervenor to address new PMs, recommend the dissolution or alteration of prior proposed PMs, and generally discuss any other PM related issues.

Q. Did you issue a Data Request inquiring whether the Company agreed to Staff's proposed future PM3 and PM4 Plan workshop and docket schedules?

A. Yes. The Company responded with the following: "[as] reflected in the Illinois Commerce Commission Performance and Tracking Metrics Workshop Summary and Report to the Commission and related comments provided, ComEd supports this proposal." (Staff Ex. 1.01.)

Q. What is your recommendation?

- A. I recommend the Commission adopt the following schedule for future PM updates and memorialize the agreement between Staff and the Company. The intent would be for this update cycle to continue indefinitely (absent a change in legislation):

Years Covered By Filing	Topic	Start/Filing Date
Utility-run PM3 Plan Workshops		Q3/Q4 2028
2032-2035	PM3 Plan Docket	1/20/2029
Utility-run PM4 Plan Workshops		Q3/Q4 2032
2036-2039	PM4 Plan Docket	1/20/2033

Id.

IV. ComEd's Proposal to Procure an Independent Evaluator Should be Adopted

Q. Does the Company propose criteria surrounding a contract with the independent evaluator?

- A. Yes, ComEd witness Perkins states:

The contract with the independent evaluator should require the evaluator to participate in annual performance evaluation proceedings as a non-party participant for the purpose of filing direct testimony that "review[s] the utility's assumptions, baselines, targets, calculation methodologies, and other relevant information, especially ensuring that the utility's data for establishing baselines matches actual performance," and reports the results, as required by Section 16-108.18(f)(3). ComEd further proposes that the contract should require the independent evaluator to respond to data requests from parties to the proceedings and be available to provide oral testimony at evidentiary hearings as required. The contract should permit, but not require, the independent evaluator to file rebuttal testimony, as well as corrected or revised testimony if needed. The contract should further require that the independent evaluator be represented at evidentiary hearings by its own legal counsel. These recommendations are based on the statutory criteria and the structure of the current contract, which was directed in the 2022 Performance

Metrics Order and informed by the roles and responsibilities of the independent evaluator in ComEd's recent energy efficiency formula rate update ("EE FRU") proceedings.

ComEd Ex. 1.0, 18.

Q. Do you agree with the Company's proposed contract criteria?

- A. Yes, I agree with the Company's proposed contract criteria. I recommend the Commission approve ComEd's proposed roles and responsibilities pertaining to the independent evaluator.

Q. Does the Company propose how the independent evaluator shall be selected?

- A. Yes, ComEd witness Perkins provides the following:

As it has done for PM Plan 1, once the Commission approves the next Plan, including the above roles and responsibilities, ComEd will conduct a competitive bidding process to select an independent evaluator, and will return to the Commission for approval of the contract. Specifically, ComEd proposes to submit a finalized (but not executed) contract to the Commission's Executive Director by letter, no less than three (3) months before the 2028-2031 Performance Metrics period. ComEd proposes that Commission Staff submit a report regarding its assessment of the contract and recommend Commission action. Once the contract is approved by the Commission and executed by ComEd and the independent evaluator, ComEd will submit an executed copy as a compliance filing in this docket.

ComEd Ex. 1.0, 18 – 19.

Q. Do you believe that the Commission should affirm the independent evaluator protocols adopted in the first PM Plan 1 docket?

- A. Yes. The independent evaluator protocols have been successful this past year. Therefore, I recommend the Commission re-affirm the independent evaluator

protocols from the first PM docket's Final Order, specifically I recommend the Commission adopt the following language:

In the event that ComEd elects to file a multi-year rate plan with the Commission pursuant to 220 ILCS 5/16-108.18(d), ComEd shall implement the following evaluator independence protocols to ensure that evaluator independence is maintained, as required by 220 ILCS 5/16-108.18(f)(3):

i. Any contract between ComEd and the independent evaluator shall provide that:

a. The Commission has the right to direct ComEd to terminate the contract if the Commission determines the evaluators were not acting independently.

b. The evaluator must act independently from ComEd and be able to independently evaluate ComEd's performance on metrics.

c. All data used in the evaluations must be made available to the Commission or Commission Staff upon request.

d. With the exception of communications related solely to contractual or other administrative issues, all written communications between the independent evaluator and ComEd (or contractor acting on ComEd's behalf) and/or Commission Staff shall be copied to ComEd and Commission Staff.

e. With the exception of any phone, webinar, or in-person meetings related solely to contractual or other administrative issues, ComEd and Commission Staff will be made aware of, and invited to, all meetings between the independent evaluator and ComEd (or contractor acting on ComEd's behalf) and/or Commission Staff.

PM Plan 1 at 227-228.

V. Tracking Metrics

A. The Reporting of Tracking Metrics

Q. Do you have a recommendation of when and where the tracking metrics should be reported?

Yes. My recommendation is that the tracking metrics should be reported on an annual basis, by June 1, and be filed in the PM docket where they were approved. The Company should continue to circulate the spreadsheets with the tracking metric data to the service list of that docket. Accordingly, the tracking metrics covering 2028 through 2031 should be reported in the present docket.

B. ComEd's Proposed Tracking Metrics and the Statutory Requirements of Section 16-108(e)(3)

Q. Can you explain why these tracking metrics are being proposed?

- A. Yes. ComEd is proposing these tracking metrics in accordance with Section 16-108(e)(3), which provides “[t]he Commission shall approve reasonable and appropriate tracking metrics to collect and monitor data for the purpose of measuring and reporting utility performance and for establishing future performance metrics.” 220 ILCS 5/16-108.18(e)(3).

Q. What is your understanding of what ComEd's proposal entails?

- A. ComEd seeks to maintain tracking metrics that were previously approved in PM Plan 1 and introduce two new tracking metrics for the Commission's consideration: TM31 (OSHA-reported injuries) and TM32 (disconnections in previous top 20 zip codes). (ComEd Ex. 1.0, 15-16); see generally, PM Plan 1 at 209-227.

Q. Did the Company provide a list of the tracking metrics proposed in this docket?

- A. Yes. ComEd witness Perkins provided a list of the proposed tracking metrics in “Table 2: Summary of Tracking Metrics in PM Plan 2.” (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 22-23.)

Q. Did you consider whether ComEd's proposed tracking metrics fall into each of the categories set forth in Section 16-108.18(e)(3)?

- A. Yes, I considered whether each of the proposed tracking metrics maintained from PM Plan 1, TM1 through TM30, as represented in ComEd Exhibit 1.0 fell within one of the categories set forth in Section 16-108.18(e)(3)(A-E) as I describe in more detail below. Id. Staff witness Balogun addresses TM31 (OSHA-reported injuries) and Staff witness Moradeyo addresses TM32 (disconnections in previous top 20 zip codes), in Staff Exhibits 3.0 and 7.0, respectively.

Q. What is your conclusion on this question?

- A. My conclusion is that ComEd's proposed tracking metrics maintained from PM Plan 1 fall into each of the categories set forth in Section 16-108.18(e)(3). The statute provides that:

(3) The Commission shall approve reasonable and appropriate tracking metrics to collect and monitor data for the purpose of measuring and reporting utility performance and for establishing future performance metrics. These additional tracking metrics shall include at least one metric from each of the following categories of performance:

(A) Minimize emissions of greenhouse gases and other air pollutants that harm human health, particularly in environmental justice and equity investment eligible communities, through minimizing total emissions by accelerating electrification of transportation, buildings and industries where such electrification results in net reductions, across all fuels and over the life of electrification measures, of greenhouse gases and other pollutants, taking into consideration the fuel mix used to produce electricity at the relevant hour and the effect of accelerating electrification on electricity delivery services rates, supply prices and peak demand, provided the revenues the utility receives from accelerating electrification of transportation, buildings and industries exceed the costs.

(B) Enhance the grid's flexibility to adapt to increased deployment of nondispatchable resources, improve the ability and performance of the grid on load balancing, and offer a variety of rate plans to match consumer consumption patterns and lower consumer bills for electricity delivery and supply.

(C) Ensure rates reflect cost savings attributable to grid modernization and utilize distributed energy resources that allow the utility to defer or forgo traditional grid investments that would otherwise be required to provide safe and reliable service.

(D) Metrics designed to create and sustain full-time-equivalent jobs and opportunities for all segments of the population and workforce, including minority-owned businesses, women-owned businesses, veteran-owned businesses, and businesses owned by a person or persons with a disability, and that do not, consistent with State and federal law, discriminate based on race or socioeconomic status as a result of this amendatory Act of the 102nd General Assembly.

(E) Maximize and prioritize the allocation of grid planning benefits to environmental justice and economically disadvantaged customers and communities, such that all metrics provide equitable benefits across the utility's service territory and maintain and improve utility customers' access to uninterrupted utility services."

220 ILCS 5/16-108(e)(3).

Emissions Reductions – Section 16-108.18(e)(3)(A)

Q. Did the Company provide a list of tracking metrics that fall within the emissions reductions category detailed in Section 108.18(e)(3)(A)?

A. Yes. The Company proposed nine tracking metrics in this category: 1) Emissions Reductions Supported by ComEd Programs; 2) ComEd Net GHG Emissions; 3) Marginal Greenhouse Gas Emissions Reduction Index; 4) Emissions Reductions from Electrification Index; 5) Report Tracking Metrics for Any Demand Response-related Tariff or Program; 6) Managed EV Charging; 7) V2G Export Compensation;

8) EV EMS Cost Savings; and 9) Direct Current Fast Charging Load. (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 24–25.)

Q. Does each proposed metric align with the category as outlined in Section 108.18(e)(3)(A)?

A. Yes, each proposed metric in this group aligns with the categories cited in Section 108.18(e)(3)(A). 220 ILCS 5/16-108.18(e)(3)(A).

Q. Is the description of each tracking metric in this category clear and achievable?

A. Yes, each metric in this category is clear and achievable.

Q. Will each tracking metric support data collection and monitoring to measure and report utility performance, as well as assist in establishing future performance metrics?

A. Yes, each metric in this category will be valuable for collecting and monitoring data to measure and report utility performance and for establishing future performance metrics.

Q. Do you agree with the data collection methods and sources relied upon for the data?

A. Yes, I agree with the data collection methods and sources relied upon for the data in this category.

Q. Do you have any recommended additional tracking metrics or modifications to the utility's proposed tracking metrics in this category?

- A. No, the Commission should approve the tracking metrics as proposed.

1. Grid Flexibility – Section 16-108.18(e)(3)(B)

Q. Can you provide a list of tracking metrics proposed by the Company that fall within the grid flexibility category as included in Section 108.18(e)(3)(B)?

- A. Yes. The Company proposed six tracking metrics in this category: 1) DERMS and Managed Charging Network Availability; 2) DERMS Participation; 3) Cumulative DER Interconnected to ComEd Distribution System; 4) Annual DER Interconnected to ComEd Distribution System; 5) EV Load and Participation; and 6) Grid Flexibility Tracking Metrics. (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 22–23.)

Q. Does each tracking metric align with the category as outlined in Section 108.18(e)(3)(B)?

- A. Yes, each tracking metric in this group aligns with the category cited in Section 108.18(e)(3)(B). 220 ILCS 5/16-108.18(e)(3)(B).

Q. Is the description of each tracking metric in this category clear and achievable?

- A. Yes, each tracking metric in this category is clear and achievable.

Q. Will each tracking metric be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics?

- A. Yes, each tracking metric in this category will be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics.

Q. Do you agree with the data collection methods and sources relied upon for the data?

- A. Yes, I agree with the data collection methods and sources relied upon for the data in this category.

Q. Do you have any recommended additional tracking metrics or modifications to the utility's proposed tracking metrics in this category?

No, the Commission should approve the metrics as proposed.

2. Cost Savings – Section 16-108.18(e)(3)(C)

Q. Can you provide a list of tracking metrics proposed by the Company that fall within the cost savings category as included in Section 108.18(e)(3)(C)?

- A. Yes. The Company proposed seven metrics in this category: 1) Avoided Outage Cost Due to Grid Modernization Investments; 2) Number of NWA Opportunities; 3) DER projects pending capacity-constrained interconnection; 4) Number of pending interconnection requests with cost estimate and current status; 5) Interconnection upgrade cost estimates as compared to actual interconnection cost; 6.) Total costs of interconnection upgrade by project and feeder; and 7.) Total time measured in days to complete key milestones of interconnection process. (ComEd Ex. 1.0, 15 – 16; ComEd Ex. 1.01, 22–23.)

Q. Does each tracking metric align with the category as outlined in Section 108.18(e)(3)(C)?

- A. Yes, each tracking metric in this group aligns with the category cited in Section 108.18(e)(3)(C). 220 ILCS 5/16-108.18(e)(3)(C).

Q. Is the description of each tracking metric in this category clear and achievable?

- A. Yes, each tracking metric in this category is clear and achievable.

Q. Will each tracking metric be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics?

- A. Yes, each tracking metric in this category will be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics.

Q. Do you agree with the data collection methods and sources relied upon for the data?

- A. Yes, I agree with the data collection methods and sources relied upon for the data in this category.

Q. Do you have any recommended additional tracking metrics or modifications to the utility's proposed tracking metrics in this category?

- A. No. The Commission should approve this tracking metric as proposed.

3. Diversity in Jobs and Opportunity – Section 16-108.18(e)(3)(D)

Q. Can you provide a list of tracking metrics proposed by the Company that fall within the diversity in jobs and opportunity category as included in Section 16-108.18(e)(3)(D)?

Yes. The Company proposed three metrics in this category: 1) % Tier 1 Spend with Illinois Businesses; 2) % Diverse Professional Services Spend; and 3) Number of Diverse Contractors Completing ComEd Development Programs. (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 22–23; See Staff Ex. 6.0.)

Q. Does each tracking metric align with the category as outlined in Section 108.18(e)(3)(D)?

A. Yes, each tracking metric in this group aligns with the category cited in Section 108.18(e)(3)(D). 220 ILCS 5/16-108.18(e)(3)(D).

Q. Is the description of each tracking metric in this category clear and achievable?

A. Yes, each tracking metric in this category is clear and achievable.

Q. Will each tracking metric be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics?

A. Yes, each tracking metric in this category will be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics.

Q. Do you agree with the data collection methods and sources relied upon for the data?

- A. Yes, I agree with the data collection methods and sources relied upon for the data in this category.

Q. Do you have any recommended additional tracking metrics or modifications to the utility's proposed tracking metrics in this category?

- A. No, I recommend the Commission approve this tracking metric as proposed.

4. Equity in Allocation of Grid Planning Benefits – Section 108.18(e)(3)(E)

Q. Can you provide a list of tracking metrics proposed by the Company that fall within the equity in allocation of grid planning benefits category as included in Section 16-108.18(e)(3)(E)?

- A. Yes. The Company proposed five metrics in this category: 1) IEEE and All-In Regional SAIDI; 2) DSM Program Equitable Participation; 3) Financial Assistance Outreach & Education; 4) Customers Exceeding Minimum Service Levels; and 5) Equitable Grid Planning Metric. (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 22–23.)

Q. Does each tracking metric align with the category as outlined in Section 108.18(e)(3)(E)?

- A. Yes, each tracking metric in this group aligns with the category cited in Section 108.18(e)(3)(E).

Q. Is the description of each tracking metric in this category clear and achievable?

A. Yes, each tracking metric in this category is clear and achievable.

Q. Will each tracking metric be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics?

A. Yes, each tracking metric in this category will be useful for collecting and monitoring data for purposes of measuring and reporting utility performance and for establishing future performance metrics.

Q. Do you agree with the data collection methods and sources relied upon for the data?

A. Yes, I agree with the data collection methods and sources relied upon for the data in this category.

Q. Do you have any recommended additional tracking metrics or modifications to the utility's proposed tracking metrics in this category?

A. No, I recommend the Commission approve this tracking metric as proposed.

Q. Do you believe the proposed tracking metrics maintained from PM Plan 1 Satisfy the requirements within the categories outlined in the statute?

A. Yes, I believe the proposed tracking metrics maintained from PM Plan 1, TM 1 through TM30, as represented in ComEd Exhibit 1.0 satisfy the requirements within the categories outlined in the statute.

5. New Tracking Metrics

Q. Did the Company propose new tracking metrics, not included in PM Plan 1?

- A. Yes. The Company proposed two new metrics: 1) ComEd employee and contractor Occupational Safety and Health Administration (OSHA) -reported injuries per year; and 2) Disconnections for nonpayment in each of the 20 zip codes being measured as part of the affordability metric from 2024 to 2027. (ComEd Ex. 1.0, 15–16; ComEd Ex. 1.01, 22–23; ComEd Ex. 5.0, 10.)

Q. Does Staff address the tracking metrics referenced above?

Yes, Staff witness Balogun addresses the newly proposed OSHA tracking metric in Staff Exhibit 3.0 and Staff witness Moradeyo addresses the newly proposed disconnection tracking metric in Staff Exhibit 7.0.

VI. Conclusion

Q. Does this conclude your prepared direct testimony?

- A. Yes.

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Request
NKD 1.01**

Date Received: May 30, 2025

Date Served: June 24, 2025

REQUEST NO. NKD 1.01:

Please specify whether ComEd supports Commission approval of future performance metric ("PM") workshops and dockets in accordance with the dates outlined in the table below. If ComEd does not support these dates, please specify a schedule for future PM workshops and dockets that ComEd supports or otherwise specify where and when ComEd prefers updates to the PMs to take place.

Years Covered By Filing	Topic	Start/Filing Date
Utility-run 3rd PM Workshops		Q3/Q4 2028
2032-2035	3rd PM Docket	1/20/2029
Utility-run 4th PM Workshops		Q3/Q4 2032
2036-2039	4th PM Docket	1/20/2033

RESPONSE:

As reflected in the Illinois Commerce Commission Performance and Tracking Metrics Workshop Summary and Report to the Commission and related comments provided, ComEd supports this proposal.