

**STATE OF ILLINOIS**  
**ILLINOIS COMMERCE COMMISSION**

COMMONWEALTH EDISON COMPANY	:	
	:	
Petition for Establishment of Performance	:	Docket No. 22-0067
Metrics Under Section 16-108.18(e) of the	:	
Public Utilities Act.	:	

Rebuttal Testimony of  
**DANIEL P. GABEL, P.E.**  
Director of Project and Contract Management  
Commonwealth Edison Company

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1    **I.     INTRODUCTION**

2           **A.     Witness Identification**

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

4    A.    My name is Daniel P. Gabel, P.E. My business address is 1 Lincoln Centre, Oakbrook  
5           Terrace, Illinois 60181.

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

7    A.    I am the Director of Project and Contract Management at Commonwealth Edison Company  
8           ("ComEd").

9    Q.    **Have you previously provided testimony in this docket?**

10   A.    No. However, subject to the approval of the Administrative Law Judges, it is my intention  
11          to adopt as my testimony the portions of the Direct Testimony of William Fluhler (ComEd  
12          Ex. 2.0 CORR), that address ComEd's original proposed interconnection performance  
13          metric, Metric 7, *i.e.*, ComEd Ex. 2.0 CORR, lines 39-47, 48-50, 272-326 (including  
14          footnotes), subject to such revisions and updates as are presented in my Rebuttal  
15          Testimony.

16           **B.     Background and Qualifications**

17   Q.    **What are your responsibilities as the Director of Project and Contract Management**  
18          **at ComEd?**

19   A.    In my current role I lead the organizations that process incoming distributed energy  
20          resource ("DER") interconnection applications and execute the construction of  
21          interconnection facilities and distribution system upgrades related to DER  
22          interconnections.

23 Q. **What is your professional experience?**

24 A. My previous professional experience in my nearly 32 years with ComEd includes positions  
25 in Engineering and Smart Grid, Transmission and Substation Engineering, Customer  
26 Operations, Transmission Interconnections, and DER Interconnection. I am also a licensed  
27 Professional Engineer in the State of Illinois.

28 Q. **What is your educational background?**

29 A. I have a Bachelor of Science degree in Electrical Engineering from Illinois Institute of  
30 Technology and a Master of Project Management degree from Keller Graduate School of  
31 Management.

32 Q. **Have you previously submitted testimony before the Illinois Commerce Commission**  
33 **(“Commission”)?**

34 A. Yes. I recently submitted direct testimony on rehearing in Commission Docket  
35 No. 21-0812, Proposed creation of Rider Solar Paired with Storage Rebate.

36 **C. Purpose of Rebuttal Testimony**

37 Q. **What is the purpose of your Rebuttal Testimony?**

38 A. The purpose of my Rebuttal Testimony is to respond to certain Direct Testimony submitted  
39 by witnesses testifying for Illinois Commerce Commission (“Commission”) Staff (“Staff”)  
40 and by other parties in this proceeding on topics related to the proposed Interconnection  
41 metric. More specifically, I will respond to the Direct Testimony of Commission\_Staff  
42 (“Staff”) witness Dr. David Rearden (Staff Ex. 7.0); Environmental Law and Policy  
43 Center / Vote Solar (“ELPC/VS”) witness William Kenworthy; Joint Solar Parties (“JSP”)

witness Karl Rábago (JSP Ex. 1.0); and Illinois Industrial Energy Consumers (“IIEC”) witness Robert Stephens.<sup>1</sup>

**D. Summary of Conclusions**

**Q. What are the conclusions of your Rebuttal Testimony?**

**A.** In brief, the conclusions of my Rebuttal Testimony are as follows:

1. ComEd received valuable feedback from Staff and intervenors in their respective Direct Testimony, and, as a result, ComEd proposes certain modifications to its proposed Metric 7 (Interconnection Timeliness) performance metric. ComEd’s revised proposed Metric 7 will benefit customers and should be approved.
2. Other performance and tracking metrics proposed by ELPC/VS and JSP relating to this subject should not be adopted.

**E. Attachments to Rebuttal Testimony**

**Q. Are there any attachments to your Rebuttal Testimony?**

**A.** Yes. Attached to my Rebuttal Testimony are:

- ComEd Ex. 9.01, a group exhibit containing copies of ComEd’s Data Request Responses (“DRRs”) to the Illinois Attorney General’s “AG” Data Request 1.09 and Staff Data Requests DTR 1.01 and DTR 2.05.
- ComEd Ex. 9.02, a visual depiction of the Days Saved Index calculation.

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<sup>1</sup> My not addressing any other Direct Testimony of Staff and intervenors should not be understood to imply any position with respect to that testimony.

62 **II. DISCUSSION OF COMED'S PROPOSED INTERCONNECTION**  
63 **PERFORMANCE METRIC AND STAFF AND INTERVENOR**  
64 **RECOMMENDATIONS**

65 **Q. Can you briefly summarize the key elements of ComEd's proposed interconnection**  
66 **performance metric?**

67 **A.** In brief, ComEd proposed a "Days Saved" interconnection performance metric, centered  
68 around the following key elements:

- 69 • The metric is designed around the utility's timeliness to customer requests for  
70 interconnection;
- 71 • The metric has a scope that is reasonably within control of the utility to achieve;  
72 and
- 73 • The metric includes all levels of interconnection requests defined in 83 Ill. Admin.  
74 Code Part 466 (the "interconnection rules" or "Part 466").

75 **Q. What is meant by "Days Saved" in the context of Metric 7?**

76 **A.** Part 466 prescribes limits on the number of business days ("days allotted") for performance  
77 of certain tasks associated with each interconnection request level (*i.e.*, Levels 1, 2, 3, 4).<sup>2</sup>  
78 For example, Part 466 states that the electric distribution company's ("EDC's")  
79 completeness review of a Level 1 interconnection request must be completed within 7  
80 business days. Part 466, Section 466.90(b)(2). Metric 7 is designed to measure how many  
81 days faster ("Days Saved") ComEd completes utility-performed tasks to approve all levels  
82 of interconnection requests compared to the days allotted by Part 466, on average in a given

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<sup>2</sup> This proposed metric does not incorporate large interconnection requests pursuant to Part 467 of the Commission's Rules, 83 Ill. Admin. Code Part 467, because ComEd receives a comparatively low volume of such requests, and because the requests are typically much more complex.

83 year. A visual depiction of the Days Saved Index calculation is provided as ComEd  
84 Ex. 9.02.

85 **Q. How do the regulatory requirements of Part 466 affect the basis point incentive and**  
86 **penalty structure of Metric 7?**

87 A. The “deadband” of Metric 7 -- that is, the performance result that would result in ComEd  
88 earning or losing no basis points in a given year -- is somewhat different than other  
89 proposed metrics because of the Part 466 requirements. In Table 1 below, the “0 bps”  
90 column reflects the deadband. If ComEd meets the Part 466 requirement about Level 1  
91 interconnection timeliness, ComEd would have achieved “0” and not receive a penalty or  
92 incentive. ComEd currently “saves” customers 11 days compared to Part 466. The  
93 deadband is constructed so that if ComEd achieves or improves on its current excellent  
94 performance of 11 “Days Saved”, it would receive an incentive (+5 bps). In contrast, any  
95 performance worse than the Part 466 requirements would result in a penalty (-5 bps).

96 **A. Response to Staff Witness Dr. Rearden**

97 **Q. In his Direct Testimony, did Staff witness Dr. Rearden (Staff Ex. 7.0) agree with**  
98 **ComEd’s proposal?**

99 A. While Staff witness Dr. Rearden did appear to generally agree with ComEd on the concept  
100 of a “Days Saved” interconnection performance metric, he opposed adoption of the original  
101 proposed metric and made recommendations for revising the metric based on the following  
102 concerns:

- 103 1. Whether the metric incentivizes continuous improvement;
- 104 2. Whether the metric is symmetrical;

105           3.     The weighting of Level 1 interconnections versus other interconnection levels;  
106           4.     The basis points assigned to the metric; and  
107           5.     The lack of an estimate of the economic value to customers of meeting the targets.  
108       Staff Ex. 7.0, 3:58 – 11:227. I will address the first three areas in my Rebuttal  
109       Testimony. The fourth point, regarding assignment of basis points to the metric, will be  
110       addressed in the Rebuttal Testimony of ComEd witness Chad Newhouse (ComEd Ex. 4.0).  
111       The fifth point will be addressed in the Rebuttal Testimony of the outside expert witnesses  
112       from Black & Veatch (ComEd Ex. 11.0), although I should be clear that I believe the  
113       proposed metric to be of value to customers.

114   Q.     **What feedback did Dr. Rearden provide on the subject of whether ComEd’s proposed**  
115           **metric incentivizes continuous improvement?**

116   A.     Dr. Rearden states, among other things, that the proposed metric “does not provide  
117       incentives for improvement in the evaluation of interconnection applications.” Staff  
118       Ex. 7.0, 10:216-217. He appears to base that view on the premise that the proposed  
119       metric’s targets “do not require ComEd to improve its performance of interconnection  
120       application evaluations above current levels.” *Id.*, 3:63 – 4:65. He later states that “based  
121       on the interconnection reviews that ComEd performed in 2020 and 2021, it seems very  
122       likely that ComEd would be eligible for the maximum incentive under its proposed  
123       [Metric 7] without doing anything more than maintaining its current performance.” *Id.*,  
124       8:165-168.

125 Q. **Do you agree with Dr. Rearden’s view that the proposed metric does not sufficiently**  
126 **incentivize continuous improvement?**

127 A. No, I do not agree with Dr. Rearden’s view because it assumes a steady state that does not  
128 currently exist. ComEd expects to operate in a significantly more challenging  
129 interconnection application processing environment during the performance period of the  
130 proposed metric (2024-2027). The September 2021 clean energy law, commonly known  
131 as the Climate and Equitable Jobs Act or “CEJA”, and new and other expected imminent  
132 changes to the interconnection rules (Part 466)<sup>3</sup> create significant uncertainty about  
133 ComEd’s ability to maintain current performance without enhanced resources and/or  
134 improved processes. Collectively, those changes are likely to lead to: (1) higher volumes  
135 of interconnection applications; (2) larger average capacity sizes for distributed energy  
136 resource (“DER”) facilities that may require additional technical reviews; and (4) longer  
137 average approval times for all interconnection levels. Examples of such changes include,  
138 but are not limited to:

- 139 • New financial incentives for solar and energy storage, including revised  
140 distribution generation rebates with expanded eligibility (amended  
141 Section 16-107.6 of the Public Utilities Act (“PUA”), 220 ILCS 5/16-107.6); and  
142 the new structure for rebates to photovoltaic facilities paired with energy storage  
143 (*id.*; *Commonwealth Edison Co.: Proposed creation of Rider Solar Paired with*  
144 *Storage Rebate*, ICC Docket No. 21-0812 (final Order Feb. 3, 2022));

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<sup>3</sup> The Commission’s interconnection rulemaking docket, ICC Docket No. 20-0700, is near its final stages. For purposes of my testimony, I have assumed that the Commission’s final proposed rule revisions will become effective.

- New \$200 cap on interconnection customer's payment responsibilities for Level 1 interconnection costs (amended Section 16-107.5 of the PUA, 220 ILCS 5/16-107.5; amended 83 Ill. Admin. Code § 466.90(c));
- Increase in allowable capacity for net metering eligibility (amended Section 16-107.5);
- Increase in Level 1 nameplate capacity from 25 kW to 50 kW (83 Ill. Admin. Code § 466.80);
- New provisions for controls to limit DER export capacity (83 Ill. Admin. Code § 466.75); and
- New requirements for utilities to perform certain technical reviews based on DER export capacity, and others based on nameplate capacity (83 Ill. Admin. Code §§ 466.90, 466.100, 466.110, 466.120).

ComEd does not understand Dr. Rearden's testimony to give any consideration of those developments.

**Q. Has ComEd formally or informally forecasted how a more challenging interconnection environment will affect the demands on its interconnection application processing in 2024 through 2027?**

**A.** No. However, we already are seeing an increase in Level 4 applications between 2019 and 2021. *See* ComEd Response to Staff Data Request DTR 2.05, provided in ComEd Ex. 9.01.

164 Q. **Has ComEd, in its Rebuttal Testimony, made its proposed Interconnection metric's**  
165 **baseline “more challenging” than originally proposed, as suggested by Dr. Rearden**  
166 **(Staff Ex. 7.0, 11:221-222)?**

167 A. Yes. In light of his comments, and notwithstanding the new environment created by CEJA  
168 and the changes in the interconnection rules, ComEd acknowledges the opportunity to  
169 better align its proposed annual performance improvement targets with ComEd's historical  
170 performance. As such, ComEd is modifying proposed Metric 7 (Interconnection) to  
171 include a more challenging target structure, as illustrated in Table 1 below. *See also*  
172 *ComEd Ex. 4.01 at Table 7.* From my perspective, taking into account the circumstances  
173 surrounding this metric, the revised targets should address Dr. Rearden's stated concerns.

174 Q. **Dr. Rearden also comments on the symmetrical nature of the proposed performance**  
175 **metric, contending that the metric is not symmetric on the grounds that the**  
176 **incremental annual targets are not equal in size. (Staff Ex. 7.0, 4:67-69). How do you**  
177 **respond?**

178 A. The interconnection performance metric targets as initially proposed are symmetrical in  
179 each applicable year. The targets for a full 10 bps incentive or a 10 bps penalty in 2021  
180 are 9.5 days saved, or -9.5 days saved, respectively, representing a full target “range” of 19  
181 (9.5 minus to 9.5). This full target range of 19 is consistent throughout the performance  
182 period, with each year's targets becoming incrementally aggressive for both incentives and  
183 penalties. As a result, it is increasingly difficult year-over-year to achieve the incentives  
184 while it becomes easier and easier to receive penalties. ComEd appreciates Staff's

feedback and proposes an updated incentive/penalty structure as illustrated in Table 1 below.

**Q. Dr. Rearden comments on the weighting of interconnection levels ComEd proposed in developing the Days Saved Index. (Staff Ex. 7.0, 7:136 – 8:168) How do you respond?**

**A.** Dr. Rearden is correct in that the proposed interconnection performance metric was originally designed to give the most weight to Level 1 interconnections. Level 1 interconnections currently encompass a large portion of the metric weighting reflective of the relative volume of interconnection applications received at each Level; and, as a result, that metric could appear as though it de-emphasizes Level 2-4 performance. To address Staff's feedback, ComEd proposes modifying the metric to equalize the weighting across all interconnection levels, *i.e.*, each level receives an equal (33.33%) weighting.<sup>4</sup>

**Q. To summarize, what modifications to the proposed Metric 7 (Interconnection Timeliness) performance metric is ComEd making to address the feedback provided by Staff?**

**A.** In light of Staff's feedback, ComEd proposes modifications as follows:

- Performance within each interconnection level will be weighted equally to derive the annual Days Saved Index targets.
- Annual targets will be adjusted to improve on ComEd's historical performance.
- Symmetry of incentives and penalties will be increased.

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<sup>4</sup> While there are four levels (Levels 1, 2 3 and 4), Levels 2 and 3 are grouped together.

Table 1 below illustrates the updated incentives and penalties applicable in each year.

**Table 1: Modified Proposed Metric 7 (Interconnection Timeliness)**

Year	Incremental Annual Target	Incentive and Penalty				
		-10 bps	-5 bps	0 bps	+5 bps	+10 bps
2024	12.00	-4.01 or lower	-4.00 to -0.01	0 to 11.99	12 to 15.99	16.00 or greater
2025	12.50	-3.51 or lower	-3.50 to -0.01	0 to 12.49	12.50 to 16.49	16.50 or greater
2026	13.00	-3.01 or lower	-3.00 to -0.01	0 to 12.99	13.00 to 16.99	17.00 or greater
2027	13.50	-2.99 or lower	-2.50 to -0.01	0 to 13.49	13.50 to 17.49	17.50 or greater

**Q. Why did ComEd choose those updated targets?**

**A.** ComEd has updated the incremental annual targets (as shown in Table 1 above) to better align with historical Days Saved Index performance, and to reflect an equal 33.33% weighting across the interconnection levels.<sup>5</sup> Accordingly, Table 2 below illustrates the 2019-2021 three-year average historical Days Saved performance for each interconnection level, and the corresponding Days Saved Index performance for that same period.

**Table 2: Days Saved Index 3-Year Average (2019-2021)**

Index Calculation 3-Year Average (2019-2021)			
Level 1	Level 2 & 3	Level 4	Index Calculation
15.94	11.14	6.02	11.03

<sup>5</sup> Levels 2 and 3 are grouped together.

214 Q. **Do ComEd's updated proposed targets address any other feedback received from**  
215 **Staff in its Direct Testimony?**

216 A. Yes. Staff witness Dr. Rearden also stated that the risk of facing a basis point reduction is  
217 much less than the probability that it receives more basis points (Staff Ex. 7.0, 9:195 –  
218 10:197). While I do not agree with Dr. Rearden's assertion because of the level of  
219 uncertainty introduced by both CEJA and the changes to the interconnection rules that I  
220 discussed earlier in my testimony, ComEd's proposed updated penalty targets are designed  
221 to be more aggressive than the corresponding incentive targets. For example, ComEd's  
222 performance must exceed the already significant improvements it has made on Days Saved  
223 performance to achieve any incentive, while a corresponding 5 bps penalty is assessed by  
224 missing the days saved by just 0.01. The more aggressive targets are reflected in Table 1  
225 above. *See also* ComEd Ex. 4.01.

226 Q. **Are the updated proposed targets for the basis points symmetrical?**

227 A. Yes, the 2024 proposed targets are centered around a deadband (*i.e.*, no incentive or  
228 penalty) that starts at the days allocated in the interconnection rules (*i.e.*, zero days saved)  
229 and ends at 11.99 days saved to align the minimum performance to achieve a 5 bps  
230 incentive with improvement on the three-year average actual Days Saved Index  
231 performance. The width of both the penalty and incentive band for a 5 bps penalty and  
232 incentive in 2024 is set at +/- 3.99 days, respectively. For subsequent years in the  
233 performance period, the dead band and, consequently, the threshold to achieve a 5 bps  
234 incentive increases by 0.50 days annually, while the threshold for a 5 bps penalty  
235 correspondingly tightens by an equivalent 0.50 days. As a result, each year becomes

increasingly challenging by the same amount to both achieve an incentive and to avoid a penalty.

**Q. Should ComEd's revised proposed interconnection performance metric be adopted?**

**A.** Yes. I believe it is a well-designed metric.

**B. Response to ELPC/VS Witness Mr. Kenworthy**

**Q. In his Direct Testimony (ELPC/VS Ex. 1.0), did ELPC/VS witness Mr. Kenworthy agree with ComEd on this proposed Metric 7?**

**A.** While Mr. Kenworthy does state that accelerating the processing of applications is a desirable outcome (ELPC/VS Ex. 1.0, 24:10-11), he does not agree that ComEd's proposed interconnection performance metric is an appropriate metric for a performance incentive (*Id.* at 26:10-12). Instead, Mr. Kenworthy proposes a new "DII" performance metric, which is based on customer adoption of various yet-to-be-defined DER-related programs and services.

**Q. Does ComEd agree with Mr. Kenworthy's position?**

**A.** No. Mr. Kenworthy's testimony does not appear to present specific facts or analysis of this specific proposed performance metric and therefore is not a reason to reject ComEd's proposed Metric 7. In addition, it is my understanding as a non-lawyer that Mr. Kenworthy's concept does not meet the plain language in the statute for an interconnection performance metric designed around the utility's timeliness to customer requests for interconnection. Additionally, achievement of ELPC/VS's proposed DII performance metric appears to be based entirely on *customer* behavior, and therefore, not

reasonably within control of the *utility* to achieve. The Commission should adopt ComEd's revised interconnection metric and should not adopt ELPC/VS's essentially unrelated and out of place recommended DII performance metric.

**Q. Mr. Kenworthy states that timely processing of interconnection applications is required by the PUA and the interconnection rules. (ELPC/VS Ex. 1.0, 29:3-5) How do you respond?**

**A.** I agree that timely processing of applications is required. Because of that, the proposed interconnection performance metric is designed to incentivize improvements over ComEd's historical performance, and above the levels required by currently effective Part 466 as well as the requirements that would be implemented by the pending changes to Part 466 that are the subject of ICC Docket No. 20-0700.

**Q. Mr. Kenworthy makes the related statement that "There is no evidence to suggest that incremental acceleration of customer interconnection applications will advance the DER integration goals that are manifest throughout the statute. ComEd's interconnection metric therefore proposes a performance incentive to solve a problem that it has not shown exists." (ELPC/VS Ex. 1.0, 29:4-7) What is your response?**

**A.** I disagree. Mr. Kenworthy seems to be citing implied goals of the statute to attempt to negate what is required by the plain language of the statute. Interconnection is one of the six areas of performance metrics mandated by the law, which calls for "Metrics designed around the utility's timeliness to customer requests for interconnection in key milestone areas...." 220 ILCS 5/16-108.18(e)(2)(A)(v). In any event, ComEd has received numerous rounds of feedback in the performance metrics workshops that reference

timeliness as a key issue for stakeholders. In fact, the *Performance and Tracking Metrics Workshop Summary Report to the Commission*, co-authored by ICC Staff and the Rocky Mountain Institute (December 1, 2021) (“Staff Report”) states:

*“A metric focused on days to interconnection appears to have widespread appeal. All five organizations that proposed metrics in this category signaled support for a metric focused on the number of days to interconnect DERs. While most commenting organizations suggested that the metric rely on the total or average days to connect, Vote Solar offered a unique design suggestion: an indexed metric focused on whether utilities are meeting milestones for different types of interconnection applications pursuant to the Commission’s existing interconnection rules set forth in 83 Illinois Administrative Code Parts 466 and 467.”*

*Id.* at 13 (emphasis added).

The index suggested by workshop parties is closely aligned with the “Days Saved” Index in ComEd’s proposed interconnection performance metric.

**Q. Mr. Kenworthy states that there is no transparency as to ComEd’s compliance with processing timelines. (ELPC/VS Ex. 1.0, 24:20-22) Do you agree?**

**A.** No. ComEd responded to multiple data requests in this docket with historical performance on the tasks related to the interconnection metric proposed. *See*, for example, ComEd’s Response and Supplemental Response to AG Data Request 1.09, copies of which are attached to Dr. Rearden’s Direct Testimony as Staff Ex. 7.0, Attachment A. The collection and maintenance of this data demonstrates that ComEd has been and will continue to be transparent regarding its compliance with processing timelines.

**Q. Mr. Kenworthy asserts that ComEd did not respond to intervenor data requests in the Commission’s Part 466 rulemaking docket (citing Data Request Joint**

304 **NGO-COMED 1.01). (ELPC/VS Ex. 1.0, 25:6-14; ELPC/VS Ex. 1.03) What is your**  
305 **response?**

306 A. Mr. Kenworthy's assertion is about another docket and is not relevant here, and it also is  
307 inaccurate. ComEd responded to multiple data requests in that docket. ComEd's primary  
308 objection asserted in response to Data Request Joint NGO-COMED 1.01 was that the  
309 request was overly broad. The Data Request requested 15 points of data (and 20  
310 sub-points) on every interconnection application received over a two-year period (nearly  
311 31,000 interconnection applications). Further, the information requested on each of nearly  
312 31,000 individual applications was not relevant to the provisions of the interconnection  
313 rules that were under discussion in the docket. Indeed, that docket progressed well without  
314 that data, and currently no party appears to disagree with its outcome.

315 Q. **Mr. Kenworthy implies that ComEd's proposed performance targets are only**  
316 **marginal improvements on its interconnection processing timelines. (ELPC/VS**  
317 **Ex. 1.0, 28:5-6). What is your response?**

318 A. I disagree that the targets are only marginal improvements. ComEd's performance must  
319 exceed the already significant improvements it has made on Days Saved performance to  
320 achieve any incentive for the interconnection performance metric.

321 Q. **With respect to ELPC/VS's idea of a "DII" metric, Mr. Kenworthy states that the**  
322 **metric would be linked to a percentage (10%) of the incremental savings or value**  
323 **created from tariffs and/or programs that ComEd will implement...that exceed base**

324 **rebate values (i.e., “additive services”). (ELPC/VS Ex. 1.0, 35:4-12) What is your**  
325 **response?**

326 A. I defer to ComEd’s legal briefing whether it is proper for ELPC/VS to propose its own  
327 performance metric and, on top of that, to propose one that is not an interconnection  
328 performance metric. I’m not sure whether Mr. Kenworthy means to suggest this as a ninth  
329 performance metric, or to replace ComEd’s proposed, and statutory mandated, timely  
330 interconnection metric. Setting that aside, ELPC/VS proposes that ComEd be held to a  
331 performance metric based on a value of DER that has not yet been determined, which is  
332 scheduled to be investigated upon the initiation of the Commission’s investigation on  
333 June 30, 2023 (as stated in ELPC/VS’s own testimony (ELPC/VS Ex. 1.0, 31:18 – 32:18  
334 (citing PUA Section 16-107.6(e)). There are some inherent uncertainties, to varying  
335 degrees, in this first performance metric docket, and I do not believe it is appropriate at this  
336 time to establish a performance metric based on so many unknown factors and yet-to-be  
337 determined outcomes as has been recommended by ELPC/VS. That point is discussed  
338 further in the Rebuttal Testimony of ComEd witness Chad Newhouse (ComEd Ex. 4.0).

339 Q. **Mr. Kenworthy also states that his DII metric “...is more consistent with the**  
340 **principles of performance-based ratemaking than the Level 1 interconnection**  
341 **incentive proposed by ComEd.” (ELPC/VS Ex. 1.0, 41:9-11) What is your response?**

342 A. This feedback was unexpected because ComEd’s initial proposed metric was not limited  
343 in this fashion. Upon investigation, I have found that statement appears to be a cut and  
344 paste error from ELPC/VS’s Direct Testimony in Ameren Illinois Company’s performance  
345 and tracking metrics docket, ICC Docket No. 22-0063. ComEd proposed an

interconnection metric based on days saved for all levels of interconnections, not just Level 1 interconnections (as proposed by Ameren).

**Q. With respect to tracking metrics, Mr. Kenworthy recommended expanded reporting by ComEd on broader application processing deadlines and cost transparency and detailed monthly reports. (ELPC/VS Ex. 1.0, 26:7-9, 42:5 – 44:1) Should that proposal be adopted?**

**A.** No. ELPC/VS has not demonstrated the relevance of this information or the benefit such monthly reports would provide. ELPC/VS has requested this information in multiple dockets, including as a member of the Joint NGOs in ICC Docket No. 20-0700, but has not demonstrated a need for, or value of, having this additional information, nor a need to receive it on a monthly basis.

These proposals are not really tracking metrics, but rather data points that ELPC/VS is interested in obtaining and have been for some time. As mentioned earlier in my testimony, the Joint NGOs requested this same information during ICC Docket No. 20-0700. It would be even more burdensome to provide this data on a monthly basis. Further, neither the Joint NGOs in Docket No. 20-0700, nor ELPC/VS in this docket, have demonstrated any benefit of having all of this information, much less justified the burden to create it.

364 **C. Response to JSP Witness Mr. Rábago**

365 **Q. In his Direct Testimony, did JSP witness Karl Rábago agree with ComEd’s proposed**  
366 **interconnection performance metric?**

367 A. No. In brief, JSP witness Mr. Rábago states that ComEd’s proposed interconnection  
368 performance metric is too narrow and fails to address specific changes in interconnection  
369 processing designed to yield increases in any identified outcomes except time for  
370 processing. (JSP Ex. 1.0, 26:479-481)

371 **Q. Does JSP propose an alternative metric that addresses any specific changes in**  
372 **interconnection processing?**

373 A. No. Similar to the DII performance metric proposed by ELPC/VS, JSP proposes a DER  
374 Utilization for Value (“DUV”) performance metric, which is based on customer adoption  
375 of various yet-to-be-defined DER-related programs and services. The DUV metric does  
376 not address interconnection processing at all.

377 **Q. Does ComEd agree with JSP’s “DUV” proposal?**

378 A. No. The Commission should reject the JSP’s recommended DUV interconnection  
379 performance metric. Specifically, it does not meet the plain language in the statute for an  
380 interconnection metric designed around the utility’s timeliness to customer requests for  
381 interconnection. Furthermore, because the proposed DUV metric focuses on customer  
382 adoption of undefined DER programs and services, it does not appear that attainment of  
383 said performance metric would be reasonably within control of the utility to achieve.  
384 Therefore, there is no reason to reject ComEd’s proposed Metric 7 (Interconnection  
385 Timeliness) for JSP’s proposed DUV metric.

386 Q. **In connection with his desired DUV metric, Mr. Rábago describes in his testimony**  
387 **certain aspects of “the DER platform over which the utility exercises control”. (JSP**  
388 **Ex. 1.0, 55:1071-1081) What is your response?**

389 A. Mr. Rábago seems to conflate “influences” and “encourages” with “controls”. Utilities can  
390 influence and encourage greater DER adoption, but utilities do not control how many  
391 customers actually adopt these technologies, or the extent to which they may sign up for  
392 programs that may influence ComEd’s performance against goals of a DUV metric as  
393 described in Mr. Rábago’s testimony. In fact, the only items among those that Mr. Rábago  
394 says the utility controls are those-items that ComEd has already incorporated into our  
395 proposed Metric 7 (Interconnection Timeliness), *e.g.*, customer interconnection experience  
396 vis a vis reducing the days to complete utility-performed interconnection tasks. While  
397 utilities can identify “opportunities” to utilize DER to deliver benefits, it is always up to  
398 customers, developers, and other non-utility parties to choose to implement those DER  
399 solutions. Further, Mr. Rábago clearly recognizes that many aspects of a utility’s ability  
400 to perform and achieve incentives under the proposed DUV metric are outside of the  
401 utility’s control, when he states in his testimony that “actual impacts of DER deployment  
402 and operation will depend on a range of exogenous conditions” (JSP Ex. 1.0,  
403 57:1122-1123).

404 Q. **Mr. Rábago infers from ComEd’s weighting proposal that ComEd appears to believe**  
405 **that benefits of its proposed interconnection performance metric are correlated with**

406 **number of applications and not, for example, the capacity of the project to be**  
407 **interconnected. (JSP Ex. 1.0, 25:470-474) What is your response?**

408 A. I agree. The benefits of days saved in the interconnection application process are  
409 cumulative based on the number of interconnection customers that enjoy them, not based  
410 on the MW capacity of projects, because project capacities vary widely. In addition, each  
411 interconnection application that is approved in a “Days Saved” manner benefits not only  
412 the project in question, but also other applicants in that they will experience reduced delays  
413 caused by projects ahead of them.

414 Q. **Mr. Rábago states that ComEd provides no rationale to focus this performance metric**  
415 **on interconnection review and study times other than its assertion of customer**  
416 **benefits. (JSP Ex. 1.0, 26:475-477) What is your response?**

417 A. ComEd’s proposed interconnection performance metric is based on the plain language in  
418 the statute for an interconnection metric designed around the utility’s timeliness to  
419 customer requests for interconnection and the feedback ComEd received in the workshops  
420 and the Staff Report. Mr. Rábago also later states that ComEd’s assertion of customer  
421 benefits is conclusory (JSP Ex. 1.0, 29:542-544), but the Staff Report cites interconnection  
422 timeliness as a key issue for stakeholders, as I noted earlier. ComEd’s proposal should not  
423 be whipsawed between complaints about interconnection processing times and assertions  
424 that speeding up interconnection processing does not benefit customers.

425 Q. **Mr. Rábago also states that ComEd’s proposed interconnection performance metric**  
426 **is too narrow on the grounds that it focuses only on one kind of DER (distributed**  
427 **generation) (JSP Ex. 1.0, 26:485-490); and, in his JSP Ex. 1.3 (p. 1, Description of**

**Metric), he proposes a broader definition of DER to include electric vehicles, demand response, energy management, etc. What is your response?**

A. ComEd believes that an interconnection performance metric should be focused on those types of DER that are defined in, and subject to, the Commission's interconnection rules. As such, ComEd's metric is focused on all types of DER that are subject to Part 466.

**Q. Mr. Rábago expresses concern that volume weighting could create a perverse incentive to escalate applications to higher levels with more review and study times. (JSP Ex. 1.0, 27:497-499). Is he right?**

A. No. Interconnection levels and the corresponding studies and reviews are prescribed by 83 Ill. Admin. Code Parts 466 and 467 (the interconnection rules). ComEd cannot simply decide to escalate applications to higher levels. The rules are prescriptive and explicit regarding when this may occur (*e.g.*, if an interconnection request fails the screens prescribed by the rules for a particular level). Further, Mr. Rábago's assertions that volume weighting somehow creates a "perverse incentive" to escalate study levels of interconnection applications is simply false. The very construct of ComEd's proposed Days Saved Index is that it measures the time to complete for each individual utility-performed task against the days allocated in the interconnection rules across all interconnection levels. A day saved is a day saved, regardless of the task on which it is saved or the interconnection level under which that task is performed. However, notwithstanding Mr. Rábago's mischaracterization of the Days Saved Index, and as stated previously in this Rebuttal Testimony, based on the feedback from a variety of stakeholders ComEd proposes a revised index that weights all interconnection levels equally.

450 Q. **Mr. Rábago proposed an additional cost savings tracking metric regarding marginal**  
451 **distribution costs at the feeder level related to the interconnection of DERs (JSP**  
452 **Ex. 1.0, 41:776-788). Do you agree with JSP's additional cost savings tracking**  
453 **metric?**

454 A. No. JSPs proposal for additional tracking metrics related to the locational and temporal  
455 value for DERs to the grid are related to the "Value of DER" proceeding which is set to  
456 begin no later than June 2023 with implementation by 2025, as I discussed earlier.  
457 Proposed metrics on the Value of DER as part of the performance metrics would be  
458 premature considering the methodology and formulation are not yet established.

459 Q. **Do you have any comments on the four tracking metrics proposed by Mr. Rábago as**  
460 **supplements to his DUV metric (JSP Ex. 1.0, 61:1187, *et seq.*)?**

461 A. Yes. JSP proposes a number of tracking metrics under four general categories:  
462 Interconnection, Implementation of DER programs, Identification of Grid Needs, and  
463 Utilization of DERs to meet grid needs. Overall, JSP has not demonstrated a need for, or  
464 value of, the tracking metrics it proposes, nor the frequency at which it proposes that  
465 ComEd make the data available. As such, the Commission should not adopt any of the  
466 four metrics.

467 Q. **Can you explain why ComEd does not support JSP's proposed Interconnection**  
468 **tracking metrics?**

469 A. Yes. JSP proposes nine tracking metrics in this category. But Mr. Rábago fails to explain  
470 why monthly reporting is necessary, or how such a monthly report would provide benefits  
471 as compared to the level of effort required to generate the requested reports. Further, JSP

472 does not justify the granularity of the detail it proposes in these monthly reports. ComEd  
473 receives an average of approximately 1,000 interconnection requests each month  
474 (ComEd's Response to Data Request DTR 1.01(a), provided in ComEd Ex. 9.01) of various  
475 interconnection levels that progress through multiple stages of the approval process and  
476 many of which require multiple studies with multiple cost estimates. Also, interconnection  
477 requests span ComEd's service territory and involve hundreds of feeders. In addition,  
478 much of the information sought through these proposed metrics is already available  
479 through other means. For example, ComEd already provides annual reports to the  
480 Commission pursuant to Section 466.140 of the interconnection rules. ComEd also posts  
481 a bi-monthly queue report on its website that shows quantity, capacity, and cost range of  
482 interconnection projects by substation and feeder and a hosting capacity map that shows  
483 available DER capacity on its electric distribution system.<sup>6</sup> Interconnection customers and  
484 developers can also request a pre-application report for information specific to substation  
485 and circuits serving the proposed point of interconnection for their projects.

486 **Q. Can you explain why ComEd does not support JSP's proposed Implementation of**  
487 **DER Programs tracking metric?**

488 **A.** Yes. JSP proposes two tracking metrics in this category related to timeliness and accuracy  
489 of bill crediting. But again, Mr. Rábago fails to explain why monthly reporting is  
490 necessary. For timeliness of bill crediting, JSP does not demonstrate a need for or value  
491 of this metric. There are circumstances when subscriber community supply credits may be

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<sup>6</sup> See ComEd, Interconnection Queue, available at <https://www.comed.com/SmartEnergy/MyGreenPowerConnection/Pages/InterconnectionQueue.aspx> (last visited May 2, 2022).

492 delayed. However, these credits will still be applied to each monthly bill period as required.  
493 The metric described by the JSP does not impact this requirement. For accuracy of billing  
494 credits, ComEd interacts with Community Supply subscribers and developers through a  
495 number of channels. Manually tracking specific reasons for these interactions through  
496 these multiple channels would be challenging compared to the benefits it would provide.

497 **Q. Can you explain why ComEd does not support JSP’s proposed “Identification of Grid**  
498 **Needs” and “Utilization of DERs to meet grid needs” tracking metrics?**

499 **A.** Yes. JSP proposes eight tracking metrics in these two categories collectively that rely on  
500 identifying passive and non-passive value of distributed energy sources to meet grid needs  
501 based on locational or geographical areas. The topic of distributed energy value is planned  
502 to be specifically addressed as part of the proceedings for Value of DER that will occur in  
503 2023, with implementation by 2025. In addition, these two proposals are redundant because  
504 ComEd’s proposed tracking metrics for the Cost Savings category proposes tracking non-  
505 wires alternatives (“NWA”) opportunities in a fashion similar to what is proposed in JSPs  
506 proposed tracking metrics.

507 **D. Response to IIEC Witness Mr. Stephens**

508 **Q. IIEC witness Mr. Stephens suggests that ComEd’s proposed interconnection**  
509 **performance metric is “too easy to meet”. (IIEC Ex. 1.0, 5:104-106, 44:734 – 45:746)**  
510 **What is your response?**

511 **A.** Mr. Stephens’ view and understanding suffers from the same failure to recognize changing  
512 circumstances that will challenge interconnection timeliness as discussed earlier. Mr.  
513 Stephens does note ComEd’s references to the new challenges, and he implies some

514 confidence in ComEd's ability to handle them (IIEC Ex. 1.0, 45:757 – 46:770), which I  
515 appreciate, but that does not alter that things have changed.

516 **Q. Mr. Stephens notes ComEd's preliminary statement that it did not expect to incur**  
517 **material incremental costs to achieve this metric, subject to stakeholder feedback, but**  
518 **then he indicates that benefits of interconnection vary from situation to situation, and**  
519 **they do not show an overall net customer benefit. (IIEC Ex. 1.0, 46:771 – 47:791)**  
520 **What is your response?**

521 **A.** The legislature called for an interconnection timeliness metric, as I referenced earlier.  
522 Many stakeholders expressed the view that interconnection timelines are important, as  
523 reflected in the Staff Report, also referenced earlier. Also, I am concerned at the notion  
524 that every performance metric must benefit all customers. It also is not clear to me whether  
525 Mr. Stephens is suggesting that interconnecting DERs has no benefits for other customers,  
526 a view which would seem to be strongly opposed by many other parties. From my view,  
527 a sufficient showing has been made that ComEd's revised proposed interconnection metric  
528 should be adopted. Please see also the Black & Veatch panel Rebuttal Testimony (ComEd  
529 Ex. 11.0).

530 **III. CONCLUSION**

531 **Q. Does this conclude your Rebuttal Testimony?**

532 **A. Yes.**