

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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1 **I. Introduction**

2 **A. Witness Qualifications**

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

4 A. My name is Leonard Hamidu. 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 Rate 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. I perform analysis and develop conclusions and recommendations on cases filed
11 with the Commission.

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

13 A. I have submitted testimonies in the Multi-Year Integrated Multi-Year Grid Plans
14 dockets for both Commonwealth Edison Co. ("ComEd"), (Docket Nos. 22-0486/23-
15 0055/24-0181 (Cons.)) and Ameren Illinois, d/b/a Ameren Illinois Co. ("Ameren"),
16 (Docket Nos. 22-0487/23-0082/24-0238 (Cons.)), in the Beneficial Electrification
17 Plans for both ComEd (Docket Nos. 24-0484/24-0577 (Cons.) and Ameren 24-
18 0494/24-0578 (Cons.))and in the Rate Design Investigation ("RDI") cases.

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

20 A. I have a Master of Science in Electricity, Telecommunication, and Natural Gas
21 Economics from Illinois State University. I also have a Master of Arts in Economics
22 from Wayne State University.

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

A. Prior to joining the Commission Staff ("Staff") in October of 2023, I was a Graduate Research Assistant and Graduate Teaching Assistant.

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 Illinois Public Utilities Act ("PUA" or "Act"), 220 ILCS 5 *et. seq.*, and supporting testimony filed by ComEd. Specifically, I will respond to net benefits for the affordability performance metric 5 ("PM5") presented by ComEd.

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 Act, I am not an attorney and none of my testimony offers any legal opinion.

C. Summary of Conclusions and Recommendations

Q. Please summarize your conclusions and recommendations.

A. I recommend the Company in rebuttal provide the programs, as well as the costs and benefits of those programs, necessary to achieve PM5 so the parties and Commission can evaluate these programs' ability to achieve the metric in this docket. Because the Company has implemented the first round of performance metrics in PM Plan 1, it should have data and analysis of how it is going to achieve the metric for PM Plan 2. The Company should provide this information in this

docket, rather than introducing this information for the first time in the grid plan. Staff will oppose programs introduced for the first time in the subsequent docket if the basis of the project is necessary to primarily achieve the PMs.

II. Affordability Performance Metric (“PM5”)

Q. Which PM category did you review?

A. I reviewed the net benefits for the affordability PM presented by ComEd. Staff witness Moradeyo addresses the affordability PM, but my testimony addresses the net benefits portion of that metric.

Q. Do you have concerns about the net benefit for the affordability metric presented by ComEd?

A. Yes. The Company did not provide a benefit-cost analysis (“BCA”) in its net benefits section of its affordability metric. ComEd states it does not have any incremental costs for the affordability PM (ComEd Ex. 5.0, 10), and it intends to continue with its existing programs to help achieve the metric (ComEd Ex. 5.0, 3). However, ComEd did not provide information on which existing programs it will be using to achieve the metric or where those existing programs are coming from (e.g. refiled grid plan, beneficial electrification plan). Also, the Company did not explain if the existing programs would be available and expect to help achieve the metric throughout the PM Plan 2 period from 2028-2031. Without this information it is not clear how the Company plans to achieve the metric.

67 The Company also did not present any quantified or monetary benefits for the
68 affordability PM and stated that the benefits it identified for PM5 cannot be
69 quantified directly. Id. at 9. Moreover, the Company did not provide information on
70 why such quantification or monetization cannot be performed for the benefits
71 associated with the metric. Because the Company has implemented the first round
72 of performance metrics in PM Plan 1, it should have data and analysis regarding
73 programs, costs, and monetized benefits that may aid in achieving this metric.

74 Though ComEd did not provide costs or quantified benefits it asserts there is
75 potential for net benefit. Id. It is not clear how the Company determined the
76 existence of potential net benefit without costs, monetized benefits, or a BCA.
77 ComEd goes on to state that “one can imagine different ways of quantifying the value
78 of avoiding being disconnected.” Id. at 9. Despite this, ComEd did not provide any
79 information on the different ways that benefits can be quantified.

80 In ComEd’s refiled grid plan (“RGP”), Docket No. 22-0486/23-0055 (Cons.),
81 ComEd used PMs as justification for some of its Type 4 programs¹. (Staff Ex. 3.01
82 RGP, 7.) ComEd presented programs to address the affordability metric in the
83 RGP and should have programs in place to achieve this metric. ComEd should not
84 introduce programs for the first time in the multi-year grid plan (“MYGP”) and use
85 the affordability PM to justify those programs. The Company should give the
86 Commission and stakeholders the opportunity to evaluate PM related programs
87 and cost in this docket. ComEd should not use PMs to justify investments in the

¹ Low Income Home Energy Assistance Program (LIHEAP)/Percentage of Income Payment Plan (PIPP) Applicant Disconnection Protection (ITN 362595), EU Customer Flight Path Program (ITN 79323) Staff Ex. 3.01, Docket No. 22-0486/23-0055/24-0181c (May 23, 2024).

88 MYGP if it has not provided the Commission the opportunity to analyze such
89 programs here.

90 **Q. What does Section 16-108.18 of the Act say about net benefits?**

91 A. Section 16-108.18 states the following:

92 For the purpose of determining reasonable performance metrics and
93 related incentives, the Commission shall develop a methodology to
94 calculate net benefits that includes customer and societal costs and
95 benefits and quantifies the effect on delivery rates...

96 Section 16-108.18(e)(2)(F).

97 **Q. What did the Commission say about net benefits in ComEd's first PM**
98 **docket?**

99 A. The Commission stated that:

100 . . .

101 The Commission further agrees with ComEd that the statute does not
102 require a cost-benefit analysis. However, to the extent possible, a cost-
103 benefit analysis would certainly aid in the Commission's analysis of any
104 particular metric's potential net benefit.
105 . . .

106 However, it would be only logical that, at a minimum, the utility proposing
107 the metrics would provide a net benefit methodology for the Commission's
108 consideration. The Commission notes that future performance metrics
109 proceedings will provide more information and therefore improve any net
110 benefit methodology.

111 Commonwealth Edison Co., ICC Final Order, Docket No. 22-0067, 69 (September
112 27, 2022) ("PM Plan 1").

113 Without a BCA from ComEd, it is not clear what information can aid the
114 Commission in its analysis of the potential net benefit for the affordability PM. To
115 the extent possible, ComEd should provide the Commission with a BCA to aid the

Commission in determining whether the proposed affordability PM has the potential to provide net benefits as indicated by ComEd. (ComEd Ex. 5.0, 9.)

The absence of this information will force the Commission to rely solely on the Company's assertion of potential net benefits without any verifiable and detailed information to that effect. The utility should at minimum provide a net benefit methodology for the Commission's consideration since the utility is proposing the metric. PM Plan 1 at 69. However, no such methodology has been presented by the utility in this docket for the affordability PM. Additionally, the Commission noted that future PM proceedings will provide more information to help improve any net benefit methodology. However, ComEd did not provide any net benefit analysis and as such is not providing any improvement beyond the PM1 methodology.

Q. Do you have any recommendation for this issue?

A. I recommend the Company in rebuttal provide the programs, as well as the costs and benefits of those programs, necessary to achieve the affordability PM so the parties and Commission can evaluate these programs' ability to achieve the metric in this docket. Because the Company has implemented the first round of performance metrics in PM Plan 1, it should have data and analysis regarding how it is going to achieve the metric. The Company should provide this information in this docket, rather than introducing this information for the first time in a future MYIGP docket. Staff will oppose programs introduced for the first time in the subsequent docket if the basis of the project is necessary to primarily achieve the PMs.

138 I recommend the Commission direct the Company that in future PM cases, the
139 Company should provide details of affordability metric related programs costs and
140 benefits in the PM docket and not introduce them in other dockets for the first time.

141 **III. Conclusion**

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

143 **A. Yes.**