

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

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Attachments

Staff Exhibit 10.01 - ComEd Response to Staff Data Request (“DR”) BU 1.01-1.09

Staff Exhibit 10.02 – Staff’s redline of proposed edits to ComEd Ex. 1.01 for Commission
adoption

1 **I. Introduction**

2 **A. Witness Qualifications**

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

4 A. My name is Buren Ulziiburen. 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 Policy Analyst in the Public Utilities Bureau's Integrated
7 Distribution Division.

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

10 A. As a policy expert, I conduct research and policy analyses of the electric utility
11 industry and identify energy and environmental policy issues in Commission
12 dockets. I am responsible for the review of filings, analysis of policy issues related to
13 the regulation of public utilities, prepare written testimony, and develop
14 recommendations to the Commission.

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

16 A. Yes. I have previously provided testimony before the Commission in other
17 proceedings, including the Multi-Year Integrated Grid Plan dockets for both
18 Commonwealth Edison Co. ("ComEd"), (Docket Nos. 22-0486/23-0055/24-0181
19 (Cons.)) and Ameren Illinois, d/b/a Ameren Illinois Co. ("Ameren"), (Docket Nos.
20 22-0487/23-0082/24-0238 (Cons.)) and the Beneficial Electrification Plans for both
21 ComEd (Docket Nos. 24-0484/24-0577 (Cons.) and Ameren 24-0494/24-0578
22 (Cons.)).

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

24 A. I graduated from the University of Chicago with a Master of Arts in International
25 Development and Policy. I graduated from Tohoku University with a Ph.D. in
26 Environmental Studies. I graduated from the Mongolian University of Science and
27 Technology with a Master of Science in Geology and a Bachelor of Science degree
28 in Environmental Geology.

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

31 A. Before joining Staff in 2023, I was an Environmental Protection Geologist for the
32 Illinois Environmental Protection Agency (“IEPA”) from 2022 to 2023. I performed
33 routine evaluations related to environmental factors and investigated hazardous
34 and solid waste management, as well as evaluated negative impacts to
35 environments. I wrote inspection reports in accordance with the Illinois State
36 standards, Illinois state environmental regulations, and Illinois Environmental
37 Protection Act.

38 **B. Purpose of Testimony**

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

40 A. The purpose of my direct testimony is to respond to Commonwealth Edison
41 Company’s (“ComEd” or the “Company”) Petition for the Establishment of
42 Performance Metrics under Section 16-108.18(e) of the Public Utilities Act and to
43 review the supporting testimony filed by ComEd. Specifically, this includes
44 assessing whether the calculation methods, baselines, performance targets,
45 incentive structures, and data sources for Performance Metric 7 (“PM 7”)

concerning Customer Service are reasonable, clearly defined, and aligned with statutory requirements. My testimony also considers whether PM 7 incentivizes continuous improvement, produces net customer benefits, are achievable by the utility, and avoid unintended consequences such as workforce reductions or double compensation. Where I identify concerns or deficiencies, I propose modifications or alternatives to better align the metrics with the law and policy goals.

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 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 Exhibits are attached to my testimony:

Staff Exhibit 10.01 ComEd Response to Staff DR BU 1.01-1.09

Staff Exhibit 10.02 Staff’s redline of proposed edits of ComEd Ex.
1.01 for Commission adoption

D. Summary of Conclusions and Recommendations

Q. Please summarize your conclusions and recommendations.

A. My conclusions and recommendations are as follows:

1. ComEd should provide in rebuttal testimony any data-driven evaluation (e.g., customer data or formal resolution studies) used to justify its selection of the following categories used in the PM 7 that measures the residential and non-

- 69 residential customer contacts resolved on the first contact or First Contact
70 Resolution ("FCR"): billing and payments, credit and collections, and
71 start/stop/move categories. (ComEd Ex. 7.0, 2-3).
- 72 2. ComEd should update its PM Plan 2 to measure Customer Service
73 Performance for both residential and non-residential customers. The
74 Commission should clarify and define the scope of PM 7 to apply to all customer
75 classes, not just residential customers.
- 76 3. The Commission should set the baseline at 87.60%, based on calendar year
77 2027 target, which includes both residential and non-residential customers.
78 The Customer Service PM 7, in ComEd's PM Plan 2 should adopt a fixed
79 baseline and increase the annual improvement rate to 0.40% consistent with
80 the more rigorous approach used in ComEd's PM Plan 1. This would adjust the
81 annual targets as follows:
- 82 ○ 2028: 88.00%
 - 83 ○ 2029: 88.40%
 - 84 ○ 2030: 88.80%
 - 85 ○ 2031: 89.20%.
- 86 4. The Company should revise the Customer Service Performance Metric in
87 ComEd's PM Plan 2 to expand the penalty and incentive ranges – specifically,
88 up to 0.29% for penalties and 0.40% for incentives (see recommended annual
89 incentive and penalty ranges for PM 7 in Staff Ex. 10.02, 2.).
- 90 5. The Company should correct the apparent typo in the 2029 penalty range upper
91 limit, listed as 88.69% in ComEd Ex. 7.0, 7, Table 2.

6. ComEd should clearly explain in its rebuttal testimony why it used a 12% non-FCR CSR contact rate in its PM Plan 2 analysis (ComEd Ex. 7.0, 8) when the actual 2024 rate was 13.19% . (Staff Ex. 10.01, 10.)
7. ComEd should evaluate avoided calls and cost savings for all customers, including both residential and non-residential customers. The Company should provide contact chain data, FCR performance, and CSR escalation rates for non-residential customers.
8. ComEd should provide a breakdown of average call duration for all customers, including both residential and non-residential customers and explain why this data is not separately tracked. In addition, ComEd should clearly justify the substantial increase in average call duration from 6.33 minutes in 2023 to 8.35 minutes in 2024 by identifying the operational, behavioral, or other contributing factors.

II. Customer Service Performance Metric (“PM 7”)

A. Description of Metric

1. Calculation Method

Q. How does ComEd propose to calculate its PM 7 under ComEd’s PM Plan 2?

- A. The Company proposes to calculate the metric as the total number of unique residential customer contacts resolved on first contact during each month divided by the total number of unique residential customer contacts during the month. (ComEd Ex. 1.01, 22; ComEd Ex. 7.0, 3.) If a customer contacts the Company again within 72 hours for the same issue category, that follow-up contact is counted

114 against the metric once. Id. The three categories included are billing and
115 payments, credit and collections, and start/stop/move. (ComEd Ex. 7.0, 4.)

116 **Q. What customer data or studies did ComEd use to decide that billing and**
117 **payments, credit and collections, and start/stop/move are best suited for**
118 **measuring FCR?**

119 A. ComEd explained that it selected billing and payments, credit and collections, and
120 start/stop/move categories to measure FCR because these are issues that can
121 typically be resolved through the customer service channels tracks, namely
122 Customer Service Representative (“CSRs”), Interactive Voice Recognition system
123 (“IVR”), Web, and Mobile App. (ComEd Ex. 1.01, 23; ComEd Ex. 7.0, 4.) However,
124 ComEd has not cited any specific customer data, analysis, or independent study
125 to support the selection of these categories as the most appropriate for measuring
126 FCR. While these categories may be logical choices based on experience, a data-
127 driven validation - such as through call resolution studies - would offer greater
128 confidence that the metric accurately reflects customer service performance.
129 Additionally, clarifying the percentage of total customer contacts represented by
130 these categories could provide additional support for why the Company selected
131 these categories.

132 **Q. What do you recommend to the Company regarding this issue?**

133 A. I recommend that ComEd provide, in its rebuttal testimony, any data-driven
134 evaluation that supports its selection of the categories currently included in the
135 FCR. (ComEd Ex. 7.0, 4.) These categories apply to all customer contacts,
136 including both residential and non-residential customers. While I understand that

the Commission must approve the metric in this docket and that changes may not be feasible at this stage, such an evaluation could inform future refinements and help ensure that the FCR metric is comprehensive, evidence-based, and representative of the broader customer experience across all relevant contact types.

Q. What customer groups are included in the proposed PM 7?

A. ComEd's PM 7 includes only residential customers and excludes non-residential customers. (ComEd Ex. 1.01, 22; ComEd Ex. 7.0, 2, 4.) ComEd justifies this limitation by stating that over 95% of customer contacts through its core channels (CSRs, IVR, Web and Mobile App) are from residential customers, and that non-residential customers (less than 5% customer contacts) often communicate through separately managed account services. (ComEd Ex. 7.0, 4.)

Q. Do you agree with ComEd's decision to exclude non-residential customers from the PM 7?

A. No, I do not. I believe the PM 7 should apply to all customer classes, including both residential and non-residential customers. While ComEd states that non-residential customer contacts account for a smaller share of total interactions - less than 5% in 2024 - it reported 680,312 total non-residential customer contact chains, with 574,587 completed with FCR. (Staff Ex. 10.01, 6.) To determine ComEd's FCR success rate for non-residential customers, I divided the 574,587 completed FCRs by the total contact chains of 680,312, which yields 0.8446. This results in an FCR rate of approximately 84.46% for non-residential customers. (Staff Ex. 10.01, 5.) Over half a million completed interactions demonstrate that

non-residential customers are actively engaging with the utility, and this volume should not be overlooked when evaluating PM 7. The ComEd's FCR performance for all customers reported a combined overall FCR of 88.56% in 2024. (Staff Ex. 10.01, 6.) Therefore, I recommend that ComEd revise PM 7 to include both residential and non-residential customers. This approach would improve transparency, enhance equity across customer types, and better reflect the utility's overall service quality.

Q. Would including non-residential contacts materially change the overall performance results under this metric?

A. No, including non-residential contacts would not materially alter the overall performance results, but it would improve the accuracy and equity of the metric.

Based on ComEd's reported data (Staff Ex. 10.01, 4-6.), I calculated the following:

- For 2024, ComEd reported 680,312 total contact chains from non-residential customers, with 574,587 resolved via FCR. Id. at 5. This results in an FCR rate of approximately 84.46%.
- For residential customers, ComEd reported 14,986,115 contact chains with 13,299,925 resolved via FCR, yielding an FCR rate of approximately 88.75%. (Staff Ex. 10.01, 4.)
- When both all customers (residential and non-residential customers) are combined, the total number of contact chains 15,666,427, with 13,874,512 resolved via FCR. (Staff Ex. 10.01, 6.) This results in a combined all customers' FCR rate of 88.56%. Id. at 6.

This difference between the residential-only FCR rate (88.75%) and the all customers (residential and non-residential customers) rate (88.56%) is only 0.19%. This confirms that including non-residential customers has a negligible effect on the performance outcome, but a meaningful effect on inclusivity and representation. ComEd has acknowledged that non-residential contacts represent less than 5% of total volume. (ComEd Ex. 7.0, 4.) My calculation shows the actual proportion to be 4.34%. While relatively small, this is not insignificant. Over half a million completed FCR interactions were recorded for non-residential customers in 2024 alone. (Staff Ex. 10.01, 5.) Excluding these customers may understate the system's overall performance and send an inconsistent signal about service quality obligations to non-residential customers. Therefore, while the overall performance score is not materially impacted, the decision to exclude non-residential customers raises concerns of fairness, transparency, and full representation in the metric scope.

Q. What do you recommend the Commission do regarding this issue?

A. I recommend the Commission define the scope of the metric going forward, clarifying that the PM 7 applies to all customer classes, including non-residential customers. This clarification will ensure consistent and transparent application of the metric in future evaluations, and will help avoid confusion or disputes in later years.

Q. How should the formula be modified to reflect your recommendation?

A. The formula of the FCR for all customers should be revised to:

FCR (all customers)

$$= \frac{\text{total number of residential + non – residential contacts resolved on first contact each month}}{\text{total number of residential + non – residential customer contacts each month}}$$

2. Annual Performance Targets

Q. What baseline and targets has ComEd proposed for the PM 7 in ComEd’s PM Plan 2?

A. ComEd proposes to calculate the baseline using the results of the metric from 2024 to 2027 to set the baseline for the 2028-2031 period. (ComEd Ex. 1.01, 23.) Beginning in 2028, ComEd sets annual targets that increase by 0.20% each year. Id. Detailed values can be found in the Table 1 below.

Q. How does the baseline and target structure in ComEd’s PM Plan 2 compare to the structure in ComEd’s PM Plan 1?

A. The Customer Service Performance Metric in ComEd’s PM Plan 1 uses a baseline of 86.00%, based on 2021 data. (Commonwealth Edison Co., ICC Final Order, Docket No. 22-0067, 207 (September 27, 2022) (“PM Plan 1 Order”).) It requires an improvement of 0.40% each year to earn incentives. Id. at 207. The PM 7 in ComEd’s PM Plan 2, however, starts with a baseline of 87.40% (ComEd Ex. 1.01, 23.), but the baseline is based on the results of the 2024-2027 FCR performance to set a fixed baseline for the 2028-2031 period. (Staff Ex. 10.01, 11; ComEd Ex. 1.01, 23.) ComEd PM Plan 2 requires a smaller improvement of 0.20% per year. ComEd Ex. 1.01, 23.

Table 1. Comparison of Key Components of Customer Service Performance Metrics under PM Plan 1 and ComEd’s Proposed PM Plan 2.

Metric element	PM1	PM2
Baseline year	2021	Results of the 2024-2027 FCR performance
Baseline value	86.00%	87.40%
Improvement rate	+0.4% per year	+0.2% per year
Target range	2024: 86.40% 2025: 86.80% 2026: 87.20% 2027: 87.60%	2028: 87.60% 2029: 87.80% 2030: 88.00% 2031: 88.20%
Incentive condition	0.4% gain/year	0.2% gain/year

226

227 **Q. Do you agree with the baseline calculation method and annual performance**
228 **targets proposed for the PM 7 under ComEd's PM Plan 2?**

229 A. No. While I agree that a PM 7 should reward improvement, I have concerns with
230 ComEd's PM Plan 2 design. (ComEd Ex. 1.01, 23.) The Company's proposed
231 baseline introduces uncertainty and may not incentivize continuous improvement
232 especially given the lower 0.2% annual improvement target, which sets a weaker
233 performance expectation than ComEd's PM Plan 1. Id.

234 **Q. What specific modifications do you recommend to improve PM7 under**
235 **ComEd's PM Plan 2?**

236 A. I recommend the Commission require ComEd to revise its PM Plan 2 Customer
237 Service Performance Metric by adopting a fixed baseline rather than one based on
238 the results of the 2024-2027 FCR performance. Specifically, the baseline should
239 be set at 87.60%, based on the calendar year 2027 target, which includes both
240 residential and non-residential customers. I also recommend increasing the annual
241 improvement requirement from 0.20% to 0.40%, which would better reflect a more

meaningful performance trajectory. Applying this approach would adjust the annual performance targets as follows:

Table 2. Recommended Annual Performance Targets for PM 7 (2028-2031)

Baseline	2028	2029	2030	2031
87.60%	88.00%	88.40%	88.80%	89.20%

These modifications address transparency and ensure early clarity around expectations that non-residential customers be included in this performance metric, as well as create a stronger incentive structure for improving FCR.

Q. Why do you recommend aligning the performance targets in ComEd's PM Plan 2 with those used in ComEd's PM Plan 1?

A. Aligning ComEd's PM Plan 2 with PM Plan 1 would create a consistent performance standard across time periods and ensure that customer service expectations do not decline over time. The 0.40% annual improvement target in ComEd's PM Plan 1 has already been accepted by the Commission (PM Plan 1 Order, 207) and reflects a reasonable but challenging goal. In contrast, a 0.20% improvement rate proposed for the ComEd's PM Plan 2 is weaker, despite ComEd starting from a higher baseline. (87.40% vs. 86.00%). Adopting the same target structure in ComEd's PM Plan 2 would help drive continuous, measurable improvement and promote stronger outcomes for the customer over time. Furthermore, the fact that ComEd acknowledges there are no incremental costs to achieve its proposed metrics demonstrate the targets are too low. (ComEd Ex. 7.0, 9-10.)

3. Incentives and Penalties

Q. What trends did you observe in comparing the structure of ComEd’s PM Plan 1 and PM Plan 2?

A. ComEd’s PM Plan 2 proposes a +/- 3 basis-point return on equity (“ROE”) adjustment for its customer service metric, consistent with its PM Plan 1. (ComEd Ex. 7.0, 7.) ComEd’s PM Plan 1 uses wider penalty and incentive ranges up to 0.29% and 0.40% respectively, allowing more flexibility. ComEd’s PM Plan 2 has narrower ranges with 0.09% for penalties and 0.20% for incentives, creating tighter precision and stricter expectations. Id. Both ComEd’s PM Plan 1 and PM Plan 2 use a consistent deadband width of 0.09% each year. Commonwealth Edison Co., Corrected Multi-Year Performance and Tracking Metrics Plan, Docket No. 22-0067, 19 (February 11, 2025) (“ComEd’s Performance Metric Plan”); ComEd Ex. 1.01, 23.

Table 3. Comparison of Annual Performance Metric Ranges: PM Plan 1 vs. ComEd’s Proposed PM Plan 2.

Year	Metric	Penalty range	Deadband range	Incentive range
2024	PM1	86.00%-86.29%	86.30%-86.39%	86.40%-86.80%
2025	PM1	86.40%-86.69%	86.70%-86.79%	86.80%-87.20%
2026	PM1	86.80%-87.09%	87.10%-87.19%	87.20%-87.60%
2027	PM1	87.20%-87.49%	87.50%-87.59%	87.60%-88.00%
2028	PM2	87.40%-87.49%	87.50%-87.59%	87.60%-87.80%
2029	PM2	87.60%-87.69%	87.70%-87.79%	87.80%-88.00%
2030	PM2	87.80%-87.89%	87.90%-87.99%	88.00%-88.20%
2031	PM2	88.00%-88.09%	88.10%-88.19%	88.20%-88.40%

ComEd’s PM Plan 1 spans 2024-2027 and starts at baseline of 86.00% (PM Plan 1 Order, 207) while PM Plan 2 covers 2028-2031 and begins at a baseline of

281 87.40%. (ComEd's Performance Metric Plan, 18; ComEd Ex. 1.01, 23.) ComEd's
282 PM Plan 1 requires an improvement of 0.40% points per year, whereas PM Plan
283 2 requires only 0.20% annually.

284 **Q. Is there a concern with the size of the penalty and incentive ranges in the PM**
285 **7 under ComEd's PM Plan 2?**

286 A. Yes, there is a concern with the size of the penalty and incentive ranges in PM 7
287 under Plan 2. (See Table 3.) Compared to Plan 1, which covers 2024 to 2027, Plan
288 2 (2028 to 2031) significantly reduces the range of performance outcomes that
289 would result in a reward or penalty. In Plan 1 for the year 2024, ComEd could earn
290 an incentive if its FCR was between 86.40% and 86.80%. (See Table #3.) This is
291 a range of 0.40%. In Plan 2 for the year 2028, the incentive range is only from
292 87.60% to 87.80%, or 0.20%. (ComEd Ex. 1.01, 23.) This means the incentive
293 opportunity has been cut in half. The penalty range is even narrower. (See Table
294 #3.) In 2024, ComEd would be penalized for performance between 86.00% and
295 86.29%, a range of 0.29%. But in 2028, the penalty range is only from 87.40% to
296 87.49%, or just 0.09%. (ComEd Ex. 1.01, 23.) These tighter bands leave ComEd
297 with a much smaller window to earn incentives or face penalties. (See Table #3.)
298 This reduces the financial impact of performance changes and may weaken the
299 motivation to invest in improvements. For example, even a real progress in
300 customer service improvement might not move the metric enough to qualify for an
301 incentive. And slight performance drops may not trigger a penalty. As a result, the
302 narrower structure in Plan 2 may discourage sustained investment in customer
303 service because the return is smaller and harder to reach.

Q. What do you recommend to improve incentives and penalties?

A. I recommend the Commission require the Company to revise PM 7 under ComEd's PM Plan 2 and adopt a wider penalty and incentives ranges, consistent with PM Plan 1. Specifically, the penalty range should extend up to 0.29% and the incentive range up to 0.40%. I recommend the following penalties and incentives ranges for this proposed PM 7:

Table 4. Recommended Annual Incentive and Penalty Ranges for Customer Service Performance (2028-2031)

Year	-3 bps to -0.01 bps	0 bps	0.01 to 3 bps
2028	87.60% or lower to 87.89%	87.90% to 87.99%	88.00% to 88.40% or higher
2029	88.00% or lower to 88.29%	88.30% to 88.39%	88.40% to 88.80% or higher
2030	88.40% or lower to 88.69%	88.70% to 88.79%	88.80% to 89.20% or higher
2031	88.80% or lower to 89.09%	89.10% to 89.19%	89.20% to 89.60% or higher

This adjustment better aligns with the intent of performance-based regulation to promote continuous, achievable, and customer-focused improvement.

Q. Do you have a recommendation regarding the 2029 ComEd's PM Plan 2 threshold error?

A. Yes. There appears to be a typographical error in the 2029 penalty range upper limit. (ComEd Ex. 7.0, 7, Table 2.) The value listed as 88.69% in Table 2 should likely be 87.69% to align with the consistent year-over-year increment structure. (Staff Ex. 10.01, 13; ComEd Ex. 7.0, 7, Table 2.) The Company should correct this error to preserve accuracy, avoid confusion, and ensure internal consistency in the metric design.

B. Net Benefits

Q. How does ComEd's PM Plan 2 quantify the net benefits of the Customer Service Performance Metric (PM 7)?

A. ComEd quantifies the net benefits primarily through avoided operational costs to its Customer Care Center (Call Center). (ComEd Ex. 7.0, 8.) Specifically, it estimates the cost of CSR time saved when customer issues are resolved on the first contact. Id. Using a CSR wage of \$1.02 per minute and an average call duration of 8.35 minutes, ComEd estimates \$8.52 in avoided costs per CSR call. Id.

Q. How does ComEd quantify these benefits?

A. It is my understanding that ComEd's benefit calculation works by recognizing that when a customer resolves their issue using a self-service or digital channel such as IVR, Website, or Mobile App, the issue does not need to be escalated to a live CSR. Id. ComEd assumes that, in the absence of resolution by those other channels, many of these interactions would have required an additional CSR call. Id. The value of these avoided CSR calls is calculated based on the time spent and wages of CSR staff, and this forms the bases for estimating the quantified net benefits. (ComEd Ex. 7.0, 9.) Although the cost savings are counted under the CSR channel, they actually result from customers successfully resolving their issues through other channels like the Web, IVR, or Mobile App. (ComEd Ex. 7.0, 8.) This means ComEd is not excluding those channels from its benefits logic, but rather characterizes success as decreasing more expensive CSR interactions.

345 **Q. Does ComEd's PM Plan 2 include any qualitative benefits as part of its PM**
346 **7?**

347 A. Yes. ComEd identifies qualitative benefits, including reduced customer effort and
348 the ability to engage with the utility using the channel of their choice. (ComEd Ex.
349 7.0, 9.) These benefits arise from the integration of multiple service channels, not
350 from any individual channel alone. Id.

351 **Q. Do you have concerns regarding ComEd's use of a 12% non-First Contact**
352 **Resolution (non-FCR) CSR rate in its customer service performance metric**
353 **analysis under PM Plan 2?**

354 A. Yes. I have concerns regarding the transparency and evidentiary support for the
355 12% non-FCR CSR rate used by ComEd in its PM Plan 2 analysis. (ComEd Ex.
356 7.0, 8.) Specifically, ComEd claims that 12% of non-FCR contacts were attributed
357 to the CSR channel and uses this assumption to estimate the volume of avoided
358 calls and associated cost savings. Id. However, ComEd does not provide sufficient
359 information on how this 12% figure was derived, what underlying data supports it,
360 or what methodology was applied. Id.

361 **Q. Why is this 12% figure important?**

362 A. The 12% rate is a critical component in ComEd's calculation of avoided CSR calls,
363 estimated at 1,595,991 avoided contacts and directly informs the \$13.6 million in
364 claimed CSR-related cost savings. (ComEd Ex. 7.0, 9.) If the 12% figure is
365 inaccurate, misapplied, or unsupported, then the avoided call volume and
366 associated net benefits may be overstated or otherwise flawed.

367 **Q. Do you have a recommendation regarding this issue?**

368 A. Yes. I recommend that ComEd provide full transparency on the derivation of the
369 12% non-FCR CSR rate, including all supporting data and the analytical methods
370 used. ComEd should provide justification for the assumption that contact
371 unresolved by other channels would have necessarily escalated to the CSR
372 channel. Additionally, ComEd should reassess the avoided call volume and
373 corresponding net benefits if the 12% estimate is found to be unsupported or
374 inconsistent with historical data.

375 **Q. What is your understanding based on ComEd's DR responses regarding how**
376 **ComEd derived the 12% figure? Has this percentage changed?**

377 A. Yes. According to ComEd's response, the actual 2024 non-FCR CSR contact rate
378 is 13.19%, not 12%. (Staff Ex. 10.01, 8-10.) This was calculated by dividing the
379 number of residential non-FCR contact chains where the second contact was with
380 a CSR (222,346) by total number of residential non-FCR contact chains
381 (1,686,190). (Staff Ex. 10.01, 8.) The percentage has changed and is higher than
382 initially stated by ComEd. (ComEd Ex. 7.0, 8.)

383 **Q. Why is this difference between 12% and 13.19% significant?**

384 A. The increase directly impacts the number of estimated avoided CSR calls and the
385 associated cost savings. A change from 12% to 13.19% increases the projected
386 avoided CSR call volume by over 150,000 calls. (Staff Ex. 10.01, 8-9; ComEd Ex.
387 7.0, 8-9.) This change materially affects the outcomes of ComEd's claimed savings
388 under PM Plan 2.

389 **Q. What is your recommendation based on this updated information?**

390 A. In its Rebuttal Testimony, ComEd should clearly explain why it initially used a 12%
391 non-FCR CSR contact rate when more current and precise data was available.
392 This will help ensure consistency, transparency, and reliability in evaluating
393 avoided cost claims.

394 **Q. Are ComEd's avoided call calculations and PM Plan 2 proposal based solely**
395 **on residential customers?**

396 A. Yes. All figures related to contact chains, FCR, and escalation to CSR were
397 derived using residential customer data only. (Staff Ex. 10.01, 8-10.) The contact
398 chains volumes and escalation rates do not include non-residential customers. Id.

399 **Q. Do you have concerns about limiting the analysis to only residential**
400 **customers?**

401 A. Yes. By focusing solely on residential customers, ComEd's proposal does not
402 capture the full CSR workload. Id. Excluding non-residential customers may
403 understate or mischaracterize the overall impact of avoided costs across ComEd's
404 full customer base.

405 **Q. What is your recommendation regarding this issue?**

406 A. I recommend ComEd expand its avoided call and cost savings analysis to include
407 both residential and non-residential customers. ComEd should provide contact
408 chain data, FCR performance, and CSR escalation rates for the non-residential
409 segment. This will provide a more complete and representative picture of customer
410 service trends and cost efficiencies across the utility's operations.

411 **Q. Do you have concerns regarding the average call duration ComEd used in**
412 **its proposed PM 7 net benefits analysis?**

413 A. Yes, I have concerns about the lack of transparency and consistency in the
414 average call duration figure ComEd used in its PM Plan 2 net benefits calculation.
415 The Company applies an average call duration of 8.35 minutes to estimate cost
416 savings associated with avoided calls to CSRs. (ComEd Ex. 7.0, 9.) However,
417 ComEd does not provide sufficient explanation or supporting data regarding how
418 this average was derived, what data sources were used, or which years were
419 included in the calculation.

420 **Q. What is your understanding based on ComEd's DR responses regarding how**
421 **the 8.35-minute figure was derived? Has this average changed significantly?**

422 A. ComEd stated that the average CSR call duration for all customers for the year of
423 2024 is 8.35. (Staff Ex. 10.01, 7.) Based on ComEd's response, the 8.35-minute
424 call duration was calculated by dividing the total time spent on CSR calls in
425 seconds (1,560,553,109) by the total number of CSR calls handled (3,116,233),
426 resulting in 500,78 seconds or 8.35 minutes. (Staff Ex. 10.01, 12.) Additionally, the
427 call duration has increased significantly from prior years from 6.33 minutes in 2023
428 to 8.35 minutes in 2024, a 32% increase in call time. (Staff Ex. 10.01, 7.) This
429 change significantly inflates the avoided cost per call and total projected savings.
430 Since ComEd did not explain the factors behind the year-over-year increase, such
431 as operational shifts, customer behavior, or call complexity, the reliability of this
432 assumption is questionable without further support. Moreover, ComEd did not
433 provide any breakout between residential and non-residential customers and
434 confirmed it does not track that information separately. (Staff Ex. 10.01, 7.)

Q. Why is it important for ComEd to provide detailed information about the average call duration used in the analysis?

A. The average call duration is a key input in calculating the cost per avoided call and, therefore, directly impacts the total estimated net benefits. (ComEd Ex. 7.0, 9.) Without transparency on the methodology, assumptions, and time period used, it is not possible to independently verify the validity of the \$8.52 cost per call or the \$13.6 million in avoided costs ComEd claims. Id.

Q. Do you have a recommendation regarding this issue?

A. Yes. ComEd should provide a breakdown of the average call duration by all customers (residential and non-residential customer) and explain why such data is not tracked. (Staff Ex. 10.01, 7.) Additionally, ComEd should provide an explanation of the significant increase in average call duration from 6.33-minutes in 2023 to 8.35-minutes in 2024 by identifying the operational or customer-driven factors contributing to this rise. Id. This explanation is necessary to assess whether the increased duration and the resulting cost assumptions are accurate and to confirm whether this change reflects temporary or permanent shifts in customer service operations.

Q. Does ComEd include any incremental costs in its proposed PM 7?

A. No. According to ComEd's testimony, it does not anticipate any incremental costs to achieve the PM 7 during the 2028-2031 period. (ComEd Ex. 7.0, 9.) While some initial implementation costs were incurred to develop the code and tracking logic prior to 2024, ComEd states that no additional costs are expected going forward. (ComEd Ex. 7.0, 9-10.)

458 **Q. What explanation does ComEd provide for assuming no incremental costs?**

459 A. ComEd explains that the costs associated with improving customer service will fall
460 within its normal operational spending. (ComEd Ex. 7.0, 10.) The Company already
461 incurs these expenses to meet statutory and regulatory requirements and does not
462 expect any material increase in costs due to this metric. Id. As a result, it assumes
463 a value of zero for incremental costs in its net benefit calculation. Id.

464 **Q. What are your observations about the net benefits analysis or Benefit-Cost**
465 **Analysis (“BCA”) ComEd has provided for the PM 7?**

466 A. ComEd provided some helpful information, including a calculation of cost savings
467 from customers resolving issues through self-service channels instead of calling a
468 live CSR. (ComEd Ex. 7.0, 8-9.) However, the Company did not include any
469 estimate of the metric’s incremental costs or present a full BCA. (ComEd Ex. 7.0,
470 9-10.) Without that, it’s hard to tell whether the benefits outweigh the costs. A more
471 complete analysis would help support the metric more clearly.

472 **III. Conclusion**

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

474 A. Yes.

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
Date Served: June 26, 2025**

REQUEST NO. BU 1.01:

Referring to ComEd Ex. 7.0, page 4, for the period January through December 2024, please provide, by month and in total:

- a) The number of non-residential customers who used each of the following channels:
 - i. Customer Service Representative ("CSR")
 - ii. Interactive Voice Response ("IVR")
 - iii. Web
 - iv. Mobile App
- b) Of the contact chains identified in (a), provide the number of non-residential customers by channel that were completed with First Contact Resolution ("FCR").

Please provide your response in Microsoft Excel spreadsheet format, consistent with the format used for the residential customer data previously provided.

RESPONSE:

ComEd objects to the phrase "customers who used each of the following channels" as vague and ambiguous, and seeking information that is not reasonably calculated to lead to the discovery of relevant or admissible evidence. The FCR metric is limited to contacts in three customer service categories regarding (i) billing and payments, (ii) credit and collections, and (iii) start/stop/move requests and contacts unrelated to those categories are outside the scope of this proceeding. Accordingly, ComEd interprets Staff's request to be seeking the number of non-residential customer contacts related to those three categories by month for January through December 2024. Subject to and without waiving the foregoing specific objection or any of ComEd's Objections to the Definitions and Instructions of the Data Requests from Staff, ComEd responds as follows:

- a - b) See the attachment labeled as BU 1.01_Attach 1 for the monthly and total number of in-scope non-residential customers contacts for the CSR, IVR, Web, and Mobile App channels, and the number and percent of such contacts that were resolved with the first contact.

2024 Non-Residential Customer Contacts by Channel

FCR Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	85.1%	84.0%	80.7%	83.4%	84.6%	83.9%	87.0%	82.9%	83.3%	83.0%	83.8%	83.9%	83.6%
App	86.8%	85.3%	83.8%	84.3%	86.3%	85.5%	86.2%	83.8%	81.8%	82.1%	82.5%	83.8%	84.2%
IVR	84.8%	84.2%	80.8%	81.1%	81.7%	83.0%	82.9%	81.2%	81.0%	80.8%	81.3%	81.2%	81.9%
CSR	87.5%	93.6%	92.5%	93.4%	92.7%	90.2%	91.8%	88.2%	88.4%	88.2%	89.3%	88.4%	90.0%
Overall FCR Rate	85.7%	84.6%	82.9%	84.9%	85.6%	84.9%	87.5%	83.7%	83.7%	83.5%	84.3%	84.3%	84.5%

FCR Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	32,895	22,662	34,562	31,065	30,703	30,660	8,574	33,306	31,047	32,380	33,634	31,182	352,670
App	5,764	3,038	4,445	4,112	4,010	3,970	1,351	4,706	4,343	4,612	4,687	4,334	49,372
IVR	5,916	5,264	5,741	5,582	5,605	5,773	5,664	6,543	6,058	6,325	6,417	6,637	71,525
CSR	9,920	1,531	9,667	8,940	7,692	8,417	8,085	9,849	9,435	8,992	9,684	8,808	101,020
Total	54,495	32,495	54,415	49,699	48,010	48,820	23,674	54,404	50,883	52,309	54,422	50,961	574,587

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	38,635	26,977	42,805	37,230	36,275	36,546	9,860	40,173	37,290	38,995	40,147	37,161	422,094
App	6,639	3,562	5,302	4,876	4,646	4,643	1,568	5,614	5,309	5,617	5,678	5,172	58,626
IVR	6,980	6,251	7,102	6,883	6,863	6,955	6,835	8,058	7,481	7,826	7,891	8,178	87,303
CSR	11,341	1,635	10,451	9,576	8,299	9,327	8,806	11,166	10,678	10,199	10,845	9,966	112,289
Total	63,595	38,425	65,660	58,565	56,083	57,471	27,069	65,011	60,758	62,637	64,561	60,477	680,312

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
Date Served: June 26, 2025**

REQUEST NO. BU 1.02:

Please confirm that ComEd's 2024 FCR performance, including both residential and non-residential customers, was 88.50%. If yes, please provide FCR data (in percentage) for all customers, i.e. FCR contacts divided by total contacts for each channel. If no, provide the correct value and supporting data.

RESPONSE:

ComEd calculated the 2024 FCR performance, including both residential and non-residential customers, as 88.56%. See the attachment labeled as BU 1.02_Attach 1 for the monthly and total number of in-scope residential, non-residential, and combined residential and non-residential customer contacts for the CSR, IVR, Web, and Mobile App channels, and the number and percent of such contacts that were resolved with the first contact.

2024 Residential Customer Contacts by Channel

FCR Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	92.06%	91.00%	89.33%	91.68%	91.90%	91.50%	92.63%	89.33%	89.44%	90.17%	90.36%	92.30%	90.82%
App	88.10%	86.14%	85.16%	87.47%	87.96%	88.04%	89.56%	85.22%	86.03%	85.52%	86.29%	88.15%	86.76%
IVR	86.87%	87.65%	86.50%	85.33%	86.17%	86.38%	85.82%	83.63%	83.90%	83.81%	84.25%	85.28%	85.37%
CSR	90.69%	95.36%	95.03%	94.82%	94.87%	93.89%	94.04%	89.85%	90.38%	89.00%	90.31%	92.98%	92.52%
Overall FCR Rate	89.79%	89.34%	88.13%	89.66%	90.00%	89.82%	90.19%	87.11%	87.47%	87.38%	87.92%	89.67%	88.75%

FCR Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	439,708	349,054	550,653	495,874	476,014	468,027	172,281	502,162	464,739	484,306	463,942	445,193	5,311,953
App	329,172	291,849	421,345	391,084	390,348	390,904	148,468	437,609	416,977	446,734	436,326	418,434	4,519,250
IVR	164,391	134,117	161,961	159,850	159,027	162,370	169,079	177,191	175,442	179,177	172,099	171,058	1,985,762
CSR	94,273	112,496	142,650	129,221	121,906	132,334	124,688	148,340	129,158	132,162	122,779	92,953	1,482,960
Total	1,027,544	887,516	1,276,609	1,176,029	1,147,295	1,153,635	614,516	1,265,302	1,186,316	1,242,379	1,195,146	1,127,638	13,299,925

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	477,609	383,596	616,434	540,902	517,992	511,489	185,986	562,122	519,599	537,078	513,453	482,316	5,848,576
App	373,621	338,803	494,762	447,131	443,792	444,009	165,767	513,502	484,666	522,396	505,638	474,681	5,208,768
IVR	189,248	153,017	187,233	187,339	184,557	187,961	197,023	211,873	209,120	213,786	204,268	200,574	2,325,999
CSR	103,946	117,967	150,105	136,286	128,500	140,953	132,589	165,101	142,911	148,492	135,955	99,967	1,602,772
Total	1,144,424	993,383	1,448,534	1,311,658	1,274,841	1,284,412	681,365	1,452,598	1,356,296	1,421,752	1,359,314	1,257,538	14,986,115

2024 Non-Residential Customer Contacts by Channel

FCR Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	85.14%	84.00%	80.74%	83.44%	84.64%	83.89%	86.96%	82.91%	83.26%	83.04%	83.78%	83.91%	83.55%
App	86.82%	85.29%	83.84%	84.33%	86.31%	85.51%	86.16%	83.83%	81.80%	82.11%	82.55%	83.80%	84.22%
IVR	84.76%	84.21%	80.84%	81.10%	81.67%	83.01%	82.87%	81.20%	80.98%	80.82%	81.32%	81.16%	81.93%
CSR	87.47%	93.64%	92.50%	93.36%	92.69%	90.24%	91.81%	88.21%	88.36%	88.17%	89.29%	88.38%	89.96%
Overall FCR Rate	85.69%	84.57%	82.87%	84.86%	85.61%	84.95%	87.46%	83.68%	83.75%	83.51%	84.30%	84.27%	84.46%

FCR Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	32,895	22,662	34,562	31,065	30,703	30,660	8,574	33,306	31,047	32,380	33,634	31,182	352,670
App	5,764	3,038	4,445	4,112	4,010	3,970	1,351	4,706	4,343	4,612	4,687	4,334	49,372
IVR	5,916	5,264	5,741	5,582	5,605	5,773	5,664	6,543	6,058	6,325	6,417	6,637	71,525
CSR	9,920	1,531	9,667	8,940	7,692	8,417	8,085	9,849	9,435	8,992	9,684	8,808	101,020
Total	54,495	32,495	54,415	49,699	48,010	48,820	23,674	54,404	50,883	52,309	54,422	50,961	574,587

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	38,635	26,977	42,805	37,230	36,275	36,546	9,860	40,173	37,290	38,995	40,147	37,161	422,094
App	6,639	3,562	5,302	4,876	4,646	4,643	1,568	5,614	5,309	5,617	5,678	5,172	58,626
IVR	6,980	6,251	7,102	6,883	6,863	6,955	6,835	8,058	7,481	7,826	7,891	8,178	87,303
CSR	11,341	1,635	10,451	9,576	8,299	9,327	8,806	11,166	10,678	10,199	10,845	9,966	112,289
Total	63,595	38,425	65,660	58,565	56,083	57,471	27,069	65,011	60,758	62,637	64,561	60,477	680,312

2024 Combined Residential and Non-Residential Customer Contacts by Channel

FCR Rate	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	91.55%	90.54%	88.77%	91.15%	91.42%	91.00%	92.35%	88.90%	89.03%	89.69%	89.88%	91.70%	90.34%
App	88.08%	86.13%	85.15%	87.43%	87.94%	88.01%	89.53%	85.21%	85.99%	85.48%	86.25%	88.10%	86.73%
IVR	86.79%	87.51%	86.30%	85.18%	86.01%	86.26%	85.72%	83.54%	83.79%	83.71%	84.14%	85.12%	85.25%
CSR	90.38%	95.34%	94.87%	94.72%	94.74%	93.66%	93.90%	89.74%	90.24%	88.95%	90.23%	92.57%	92.36%
Overall FCR Rate	89.57%	89.16%	87.90%	89.45%	89.81%	89.61%	90.08%	86.96%	87.31%	87.22%	87.76%	89.42%	88.56%

FCR Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	472,603	371,716	585,215	526,939	506,717	498,687	180,855	535,468	495,786	516,686	497,576	476,375	5,664,623
App	334,936	294,887	425,790	395,196	394,358	394,874	149,819	442,315	421,320	451,346	441,013	422,768	4,568,622
IVR	170,307	139,381	167,702	165,432	164,632	168,143	174,743	183,734	181,500	185,502	178,516	177,695	2,057,287
CSR	104,193	114,027	152,317	138,161	129,598	140,751	132,773	158,189	138,593	141,154	132,463	101,761	1,583,980
Total	1,082,039	920,011	1,331,024	1,225,728	1,195,305	1,202,455	638,190	1,319,706	1,237,199	1,294,688	1,249,568	1,178,599	13,874,512

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	516,244	410,573	659,239	578,132	554,267	548,035	195,846	602,295	556,889	576,073	553,600	519,477	6,270,670
App	380,260	342,365	500,064	452,007	448,438	448,652	167,335	519,116	489,975	528,013	511,316	479,853	5,267,394
IVR	196,228	159,268	194,335	194,222	191,420	194,916	203,858	219,931	216,601	221,612	212,159	208,752	2,413,302
CSR	115,287	119,602	160,556	145,862	136,799	150,280	141,395	176,267	153,589	158,691	146,800	109,933	1,715,061
Total	1,208,019	1,031,808	1,514,194	1,370,223	1,330,924	1,341,883	708,434	1,517,609	1,417,054	1,484,389	1,423,875	1,318,015	15,666,427

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
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REQUEST NO. BU 1.03:

Please provide the average customer call duration for all customers for each of the past five years (2020-2024), as well as the five-year total. Include a breakout showing:

- i. Residential only
- ii. Non-residential only
- iii. Combined residential and non-residential

RESPONSE:

ComEd does not track average Customer Service Representative ("CSR") call duration by residential and non-residential customers. The average CSR call duration for all customers for each of the past five (5) years is shown below:

Year	Minutes
2020	5.82
2021	5.93
2022	5.95
2023	6.33
2024	8.35

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
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REQUEST NO. BU 1.04:

Please provide a detailed explanation of how ComEd's 12% non-FCR CSR rate was calculated, including all data sources, assumptions, and methodologies used.

RESPONSE:

ComEd stated that in 2024 approximately 12% of ComEd's non-FCR contacts were attributed to the CSR channel. The exact non-FCR CSR rate for 2024 was 13.19%. This percentage was calculated using the number of residential non-FCR contact chains where the second contact was with a CSR (222,346), divided by the total number of residential non-FCR contact chains (1,686,190). The total number of residential non-FCR contact chains is calculated by taking the total number of contact chains (14,986,115) and subtracting the number of FCR contact chains (13,299,925). See the attachment labeled as BU 1.04_Attach 1 for the monthly and total number of in-scope non-FCR residential customers contacts for the CSR, IVR, Web, and Mobile App channels where the second contact was with a CSR, and the total number of in-scope non-FCR residential customers contacts for the CSR, IVR, Web, and Mobile App channels.

2024 Residential Non-FCR Customer Contacts by Starting Channel

Volume of non-FCR Contact Chains where Second Contact is with a CSR	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	3,411	1,036	5,920	5,854	6,297	7,389	2,193	9,594	7,680	6,860	5,941	4,084	66,259
App	889	470	2,203	1,681	2,138	2,655	692	3,795	2,708	3,026	2,079	1,687	24,023
IVR	1,243	378	3,033	3,574	3,319	3,583	4,192	5,202	4,378	4,845	3,539	3,837	41,123
CSR	5,127	5,033	5,889	5,581	5,143	6,895	6,953	13,074	10,315	12,411	9,750	4,770	90,941
Total	10,670	6,917	17,045	16,690	16,897	20,522	14,030	31,665	25,081	27,142	21,309	14,378	222,346

Total Volume of non-FCR Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	37,901	34,542	65,781	45,028	41,978	43,462	13,705	59,960	54,860	52,772	49,511	37,123	536,623
App	44,449	46,954	73,417	56,047	53,444	53,105	17,299	75,893	67,689	75,662	69,312	56,247	689,518
IVR	24,857	18,900	25,272	27,489	25,530	25,591	27,944	34,682	33,678	34,609	32,169	29,516	340,237
CSR	9,673	5,471	7,455	7,065	6,594	8,619	7,901	16,761	13,753	16,330	13,176	7,014	119,812
Total	116,880	105,867	171,925	135,629	127,546	130,777	66,849	187,296	169,980	179,373	164,168	129,900	1,686,190

Percent of non-FCR Contact Chains due to a Second Contact with a CSR

222,346 / 1,686,190 = 13.19%

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
Date Served: June 26, 2025**

REQUEST NO. BU 1.05:

The total of 13,299,925 contact chains completed with First Contact Resolution in 2024 is reported to be distributed among the Web, App, IVR, and CSR channels.

ComEd stated that "[i]n 2024, approximately 12% of ComEd's non-FCR contacts were attributed to the CSR channel." (ComEd Ex. 7.0, 8. Please explain:

- i. How were "avoided CSR calls" determined? Please provide all supporting data and calculations used to support this value.
- ii. What data supports the assumption that these contacts would have gone to a CSR channel if not resolved via another channel?

RESPONSE:

- i. The number of avoided CSR calls was determined by using the approximate percent of non-FCR contacts in 2024 where the second contact was with a CSR (12%) and multiplying that by the total number of residential FCR contacts in 2024 (13,299,925). The resulting number, 1,595,991, represents the potentially avoided CSR calls if ComEd had a 0% FCR score in 2024.
- ii. As shown in ComEd's Response to Staff Data Request BU 1.04, 13.19% of the non-FCR contacts had CSR as the second contact, regardless of the originating channel. That data supports the assumption that approximately 12% of second contacts would have gone to CSRs if the first contact resolution was 0%.

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
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BU 1.01 – BU 1.09
Date Received: June 13, 2025
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REQUEST NO. BU 1.06:

Please provide ComEd's rationale for switching from a fixed baseline (in the 2022 performance metric filing) to a rolling baseline for the FCR performance metric in this year's performance metric filing. What policy, analytical, or empirical justification supports this change?

RESPONSE:

ComEd is not proposing a "rolling" baseline for the FCR performance metric. ComEd proposes using the results of the 2024-2027 FCR performance to set a fixed baseline for the 2028-2031 period. The goal that ComEd would need to achieve each year would then increase at a fixed 0.2% annually from that baseline. This is nearly identical to the current metrics plan, which uses a fixed baseline of 86.0%, with a fixed 0.4% annual increase.

ComEd proposes using 2024-2027 performance in setting the baseline for the 2028-2031 period because this will allow for targets set using historical numbers from actual FCR performance, whereas the 2024-2027 baseline of 86.0% was calculated using assumptions for Mobile App performance as Mobile App data was not yet available.

ICC Docket No. 25-0514

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

BU 1.01 – BU 1.09

Date Received: June 13, 2025

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REQUEST NO. BU 1.07:

Referring to ComEd Ex. 7.0, page 8:

- a) Please provide a detailed explanation of how the average call duration used in the net benefits analysis (i.e., 8.35 minutes per ComEd Ex. 7.0, p. 8) was calculated, including all data sources, assumptions, and methodologies used, as well as the years included in the calculation. Provide all supporting data used in the calculation.
- b) Please explain whether the methodology and timeframes used for the calculation are consistent with the approach used in ComEd's 2022 performance metrics filing net benefit calculation, and if not, explain the differences in approach to calculate the average call duration including the timeframe differences.

RESPONSE:

- a) ComEd's 2024 average call time of 8.35 minutes was calculated by taking the total time in seconds of all CSR calls handled in 2024 (1,560,553,109) divided by the number of CSR calls ComEd handled in 2024 (3,116,233). The result is an average call time of 500.78 seconds, or 8.35 minutes after dividing by 60.
- b) The methodology used to calculate the average CSR call length in the 2022 performance metric filing was consistent with the methodology used in Menard Dir., ComEd Ex. 7.0 at 8. However, the timeframes are different. In the 2022 performance metric filing ComEd used an average call length that reflected the average call length during the first months of 2022. In the current filing ComEd is using calendar year 2024 as the relevant time frame.

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
Date Served: June 26, 2025**

REQUEST NO. BU 1.08:

Please confirm whether there is a typographical error in the penalty range specified in Table 2 in ComEd Ex. 7.0 (specifically, where 88.69% should be 87.69%). If ComEd agrees there is an error, please clarify whether the accurate penalty ranges are specified in ComEd Ex. 1.01.

RESPONSE:

Yes, there is a typographical error in the penalty range specified in Table 2 in Menard Dir., ComEd Ex. 7.0 at 7:123. The Penalty Min for 2029 should be listed as 87.69%, not 88.69%.

ComEd agrees that the accurate penalty ranges are specified in ComEd Ex. 1.01. ComEd clarifies that these ranges are for illustrative purposes only, as the actual ranges will be set once the baseline is calculated using 2024-2027 data.

ICC Docket No. 25-0514

**Commonwealth Edison Company's Response to
Illinois Commerce Commission ("STAFF") Data Requests
BU 1.01 – BU 1.09
Date Received: June 13, 2025
Date Served: June 26, 2025**

REQUEST NO. BU 1.09:

For 2021 through 2024, please provide the number of residential and non-residential customer contacts for each of the following channels broken down by month and by year:

- i. Customer Service Representative ("CSR")
- ii. Interactive Voice Response ("IVR")
- iii. Web
- iv. Mobile App

RESPONSE:

The FCR metric is limited to residential customer contacts in three customer service categories regarding (i) billing and payments, (ii) credit and collections, and (iii) start/stop/move requests and contacts unrelated to those categories are outside the scope of this proceeding. Accordingly, ComEd interprets Staff's request to be seeking the number of residential and non-residential customer contacts related to the three FCR categories by month and year for 2021 through 2024. In addition, ComEd objects to this request to the extent that it would require ComEd to perform analyses and/or create documents and exhibits that ComEd does not currently have in its possession, custody, or control. Subject to that clarification and subject to and without waiving the foregoing objection, ComEd responds as follows:

Customer contacts related to the three FCR categories for the CSR, IVR, Web, and Mobile App channels can only be provided for 2024, because the data necessary to respond to this request only exists for 2024 and beyond. Retrieving the total number of customer contacts related to the three FCR categories for the CSR, IVR, and web channels for periods prior to 2024 would require ComEd to reformat historical data using code that does not currently exist. In addition, contacts for the mobile app did not exist prior to 2024.

See the attachment labeled as BU 1.09_Attach 1 for the monthly and total number of in-scope residential, non-residential, and combined residential and non-residential customer contacts for the CSR, IVR, Web, and Mobile App channels in 2024.

2024 Residential Customer Contacts by Channel

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	477,609	383,596	616,434	540,902	517,992	511,489	185,986	562,122	519,599	537,078	513,453	482,316	5,848,576
App	373,621	338,803	494,762	447,131	443,792	444,009	165,767	513,502	484,666	522,396	505,638	474,681	5,208,768
IVR	189,248	153,017	187,233	187,339	184,557	187,961	197,023	211,873	209,120	213,786	204,268	200,574	2,325,999
CSR	103,946	117,967	150,105	136,286	128,500	140,953	132,589	165,101	142,911	148,492	135,955	99,967	1,602,772
Total	1,144,424	993,383	1,448,534	1,311,658	1,274,841	1,284,412	681,365	1,452,598	1,356,296	1,421,752	1,359,314	1,257,538	14,986,115

2024 Non-Residential Customer Contacts by Channel

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	38,635	26,977	42,805	37,230	36,275	36,546	9,860	40,173	37,290	38,995	40,147	37,161	422,094
App	6,639	3,562	5,302	4,876	4,646	4,643	1,568	5,614	5,309	5,617	5,678	5,172	58,626
IVR	6,980	6,251	7,102	6,883	6,863	6,955	6,835	8,058	7,481	7,826	7,891	8,178	87,303
CSR	11,341	1,635	10,451	9,576	8,299	9,327	8,806	11,166	10,678	10,199	10,845	9,966	112,289
Total	63,595	38,425	65,660	58,565	56,083	57,471	27,069	65,011	60,758	62,637	64,561	60,477	680,312

2024 Combined Residential and Non-Residential Customer Contacts by Channel

Total Contact Chains	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Total
Web	516,244	410,573	659,239	578,132	554,267	548,035	195,846	602,295	556,889	576,073	553,600	519,477	6,270,670
App	380,260	342,365	500,064	452,007	448,438	448,652	167,335	519,116	489,975	528,013	511,316	479,853	5,267,394
IVR	196,228	159,268	194,335	194,222	191,420	194,916	203,858	219,931	216,601	221,612	212,159	208,752	2,413,302
CSR	115,287	119,602	160,556	145,862	136,799	150,280	141,395	176,267	153,589	158,691	146,800	109,933	1,715,061
Total	1,208,019	1,031,808	1,514,194	1,370,223	1,330,924	1,341,883	708,434	1,517,609	1,417,054	1,484,389	1,423,875	1,318,015	15,666,427

G. PM 7: CUSTOMER SERVICE

1. First Contact Resolution

a) Description

The customer service performance metric measures the percentage of all customers including residential and non-residential customer contacts resolved on the first contact. Specifically, this performance metric will measure the percentage of customer contacts regarding (i) billing and payments, (ii) credit and collections, and (iii) start/stop/move requests, that are resolved on the first contact with ComEd's Customer Service Representatives (CSRs), Interactive Voice Recognition system (IVR), web, and mobile app within a period of 72 hours.

a) Calculation Method

The metric is calculated as: (i) the total number of unique residential and non-residential customer contacts resolved on first contact during each month, divided by (ii) the total number of unique residential and non-residential customer contacts during the month. No additional residential and non-residential customer contacts for the given category (billing and payments, credit and collections, or start/stop/move) within 72 hours are counted toward the metric. Any subsequent contacts by the residential and non-residential customer for the given category within 72 hours will be counted against the metric, and will be counted against the metric only once, regardless of the number of additional contacts.

b) Data Sources

Data regarding contacts to ComEd's CSR, IVR, website, and mobile app will be collected through the Exelon Utilities Data Analytics Platform ("DAP"), and inputted into a dashboard that will enable ComEd to track and report on this metric.

Data for the channels will come from the following four main source systems:

- Website: Google Analytics;
- Mobile App: Google Analytics;
- IVR: Converge One and Paymentus; and
- CSRs: Oracle's Customer Care and Billing (CC&B) system

All this data is loaded into the Exelon Utilities Data Analytics Platform (DAP), which serves as a centralized dashboard for tracking and reporting performance. The datasets include records of each customer interaction-such as website pages visited, app screens accessed, or phone prompts selected-along with timestamps and session or call IDs. For CSR interactions, the system uses records of customer calls created by representatives.

c) Baseline and Target Performance

The customer service performance metric ~~uses the results of the metric from 2024-2027 to set the~~ baseline for the 2028-2031 period ~~is set at 87.60%, based on calendar year 2027 target, which includes both residential and non-residential customer. The penalty ranges up to 0.29%.~~ In order to earn an incentive in any year, ComEd must achieve improvement above the baseline. To earn an incentive in any year, ComEd must achieve an improvement of ~~0.2%~~ 0.4% percentage points above the prior year target, as shown on the following table. Note that the table below uses illustrative numbers.

Table 1 - Customer Service Performance Metric Annual Performance Targets

Baseline	2028	2029	2030	2031
87.40% <u>87.60%</u>	87.60% <u>88.00%</u>	87.80% <u>88.40%</u>	88.00% <u>88.80%</u>	88.20% <u>89.20%</u>

d) Incentives and Penalties

A symmetrical incentive or penalty of +/- 3 basis points will be applied depending on whether ComEd meets (or fails to meet) its incremental annual target. The table below shows the incentives and penalties applicable in each year. ~~Again, the numbers in the table are illustrative only; the actual targets will be set when ComEd sets the baseline based on 2024-2027 performance.~~

Year	-3 bps to -0.01 bps	0 bps	0.01 to 3 bps
2028	87.40% or lower to 87.49% <u>87.60% or lower to 87.89%</u>	87.50% to 87.59% <u>87.90% to 87.99%</u>	87.60% to 87.80% or higher <u>88.00% to 88.40% or higher</u>
2029	87.60% or lower to 87.69% <u>88.00% or lower to 88.29%</u>	87.70% to 87.79% <u>88.30% to 88.39%</u>	87.80% to 88.00% or higher <u>88.40% to 88.80% or higher</u>
2030	87.80% or lower to 87.89% <u>88.40% or lower to 88.69%</u>	87.90% to 87.99% <u>88.70% to 88.79%</u>	88.00% to 88.20% or higher <u>88.80% to 89.20% or higher</u>
2031	88.00% or lower to 88.09% <u>88.80% or lower to 89.09%</u>	88.10% to 88.19% <u>89.10% to 89.19%</u>	88.20% to 88.40% or higher <u>89.20% to 89.60% or higher</u>