

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

JIE CHU

Director, Revenue Management
Commonwealth Edison Company

TABLE OF CONTENTS

I.	INTRODUCTION	1
A.	Witness Identification	1
B.	Background and Qualifications.....	1
C.	Purpose of Rebuttal Testimony.....	3
D.	Summary of Conclusions.....	3
E.	Attachments to Rebuttal Testimony.....	4
II.	DISCUSSION	5
A.	Consideration of Staff and Intervenor Direct Testimony	5
B.	Affordability Performance Metric	5
C.	Financial Assistance Outreach & Education Tracking Metric	16
III.	CONCLUSION.....	17

1 **I. INTRODUCTION**

2 **A. Witness Identification**

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

4 A. My name is Jie Chu. My business address is 1919 Swift Drive, Oak Brook, Illinois 60181.

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

6 A. I am employed by Commonwealth Edison Company (“ComEd”) as the Director of
7 Revenue Management.

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

9 A. No. However, subject to the approval of the Administrative Law Judge, it is my intention
10 to adopt as my testimony the portions of the Direct Testimony of Nichole Owens (ComEd
11 Ex. 3.0 CORR) that address ComEd’s original proposed Affordability metric, Metric 6,
12 *i.e.*, ComEd Ex. 3.0 CORR, lines 38-42 (as applicable) and 100-165, subject to such
13 revisions and updates as are presented in my Rebuttal Testimony.

14 **B. Background and Qualifications**

15 Q. **What are your responsibilities as Director of Revenue Management at ComEd?**

16 A. In my current role as the Director of Revenue Management, I am responsible for ComEd’s
17 credit and collections function, including establishment of ComEd’s credit management
18 policies and procedures, governance over credit activities, overseeing ComEd’s collections
19 processes, monitoring ComEd’s outstanding receivables, and managing the collections
20 recovery effort.

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

22 A. In 2004, I started working for Exelon as a financial analyst in the Finance Department.
23 From 2010 until 2015, I worked as the Manager of Customer Analytics in Revenue
24 Management at ComEd, where I was responsible for financial modeling and customer
25 analytics. From 2015 through 2020, I served as Manager of the Billing Operations and
26 Project Management departments for ComEd. In June 2020, I assumed my current
27 responsibilities as the Director of Revenue Management for ComEd. Prior to joining
28 Exelon in 2004, I worked in various not-for-profit organizations and higher education
29 institutions.

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

31 A. I received a Bachelor of Arts Degree in Liberal Arts and Sciences from Monmouth College
32 and a Master of Business Administration from the Keller Graduate School of Management.

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

35 A. Yes. I have previously provided testimony in Docket No. 21-0427 (biannual purchase of
36 receivables and consolidated billing services to retail electric service providers rider
37 reconciliation (“Rider PORCB”)) and Docket Nos. 20-0667 and 21-0646 (annual
38 uncollectibles rider reconciliation (“Rider UF”)).

39 **C. Purpose of Rebuttal Testimony**

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

41 A. The purpose of my Rebuttal Testimony is to respond to certain Direct Testimony submitted
42 by witnesses testifying for Commission Staff (“Staff”) or for Intervenors on topics relating
43 to the proposed Affordability performance metric.¹ More specifically:

44 1. On the subject of ComEd’s January 20, 2022, metric filing’s proposed performance
45 Metric No. 6, Affordability – Percent of Customers with an Arrearage Over 90
46 Days, I will respond to the Direct Testimony of Staff witness Joan Howard (Staff
47 Ex. 6.0); Community Organizing and Family Issues (“COFI”) witness John Howat
48 (COFI Ex. 1.0 Corr.); Illinois Industrial Energy Consumers (“IIEC”) witness
49 Robert Stephens (IIEC Ex. 1.0); and Joint Solar Parties (“JSP”) witness Karl
50 Rábago (JSP Ex. 1.0); and

51 2. On the subject of ComEd’s January 20, 2022, filing’s proposed tracking Metric
52 No. 11, Equity in the Allocation of Grid Planning Benefits – Financial Assistance
53 Outreach & Education, I will respond to Staff witness Ms. Howard and CUB/EDF
54 witness Andrew Barbeau (CUB/EDF Ex. 1.0).

55 **D. Summary of Conclusions**

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

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

¹ On April 6, 2022, Staff and intervenors submitted Direct Testimony. My not responding to other Direct Testimony of Staff and intervenors should not be understood to mean that I agree or disagree with that testimony.

58 1. ComEd has carefully considered the respective Staff and Intervenor Direct
59 Testimony on the subject of ComEd's January 20, 2022, filing's proposed
60 Affordability performance metric and the Financial Assistance Outreach &
61 Education tracking metric.

62 2. With respect to the Affordability metric, ComEd agrees to substitute COFI witness
63 Mr. Howat's proposed Affordability performance metric as the measure of
64 ComEd's performance, with a slight modification, although ComEd's original
65 proposal remains a viable alternative. ComEd nonetheless has concluded that it
66 should adhere to its contemplated efforts to connect customers with assistance
67 under its original proposed Affordability metric. Those efforts will also support
68 the achievement of Mr. Howat's metric. I do not agree, however, with all of the
69 statements of Mr. Howat. I believe that ComEd's rebuttal approach or,
70 alternatively, its original proposal, should be accepted after considering the other
71 Staff and intervenor Direct Testimony on this subject.

72 3. With respect to the Financial Assistance Outreach & Education tracking metric, I
73 continue to support ComEd's proposal, and I answer the questions posed by Staff
74 witness Ms. Howard. I also respond briefly to recommendations made by
75 CUB/EDF witness Mr. Barbeau.

76 **E. Attachments to Rebuttal Testimony**

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

78 A. Yes, attached to my Rebuttal Testimony is ComEd Ex. 8.01, a group exhibit consisting of
79 ComEd's Responses to Data Requests AG-1.08 and IIEC-2.12.

80 **II. DISCUSSION**

81 **A. Consideration of Staff and Intervenor Direct Testimony**

82 **Q. Did ComEd carefully consider Staff and intervenor Direct Testimony regarding the**
83 **Affordability performance metric and the Financial Assistance Outreach &**
84 **Education tracking metric proposed in the January 20, 2022, filing?**

85 A. Yes. The overall subject of ComEd's consideration of Staff and intervenor Direct
86 Testimony is addressed in the Rebuttal Testimony of ComEd witness Chad Newhouse
87 (ComEd Ex. 4.0). I can confirm, however, that ComEd carefully considered the Staff and
88 intervenor Direct Testimony regarding ComEd's original proposed Affordability
89 performance metric and the Financial Assistance Outreach & Education tracking metric,
90 as is reflected in the remainder of my Rebuttal Testimony.

91 **B. Affordability Performance Metric**

92 **Q. Please summarize ComEd's January 20, 2022, filing's proposed Affordability**
93 **performance metric.**

94 A. In brief, ComEd's proposed Affordability metric focused on reducing the number of
95 customers with arrearages over 90 days.

96 **Q. Having reviewed the Staff and intervenor Direct Testimony on the subject of**
97 **ComEd's proposed Affordability performance metric, what is ComEd's position now**
98 **on the subject of the Affordability metric?**

99 A. ComEd will substitute COFI witness Mr. Howat's proposed Affordability performance
100 metric for ComEd's proposed metric, with a slight modification, although ComEd's
101 original proposed metric remains a viable alternative. At a high level, COFI witness

Mr. Howat's proposed Affordability performance metric is based on a 10% annual reduction (measured year over year) over a four-year period (2024-2027) in residential disconnections for nonpayment in the 20 zip codes in ComEd's service territory with the highest 2017-2019 disconnection for non-payment ratios. COFI Ex. 1.0 CORR., 5:1-8.

Q. What is the small modification ComEd proposes to make to COFI witness Mr. Howat's proposed Affordability performance metric?

A. ComEd proposes to modify Mr. Howat's proposed Affordability metric slightly by using a 10% decrease in the aggregate total of the top 20 zip codes instead of a 10% decrease in each zip code. Aggregating the results of the zip codes prevents this metric from becoming 20 separate metrics, one for each zip code.

Q. Returning to ComEd's filing's proposed Affordability performance metric, which focused on reducing arrearages, did COFI witness Mr. Howat indicate agreement to the proposal?

A. No. *See* COFI Ex. 1.0 CORR, 4:16-19.

Q. What is your understanding of COFI witness Mr. Howat's Direct testimony on the subject of ComEd's filing's proposed Affordability performance metric?

A. Mr. Howat's Direct testimony is 47 pages long on the single subject of an Affordability performance metric and is difficult to summarize in a few sentences. In brief, my understanding is that Mr. Howat claims that ComEd's original proposed Affordability metric: (1) is not targeted at reductions in arrearages within households that are low-income or located in environmental justice communities ("EJCs") or equity investment eligible

123 communities (“EIECs”); (2) is not targeted at reductions in bills or affordable rates for
124 those three (overlapping) groups of customers; (3) is not targeted at reductions in
125 disconnections for non-payment of those three groups of customers; (4) is not designed to
126 reward exceptional performance; and (5) should be replaced by his proposed Affordability
127 performance metric that is based on a 10% annual reduction (measured year over year)
128 over a four-year period (2024-2027) in residential disconnections for non-payment in the
129 20 zip codes in ComEd’s service territory with the highest 2017-2019 disconnection for
130 non-payment ratios, with up to 10 basis points (“bps”) for penalties and incentives (rather
131 than the 5 bps proposed by ComEd). *See, e.g.,* COFI Ex. 1.0 CORR, 26:8 – 33:4.
132 Mr. Howat states that 16 of the 20 zip codes fall within EJC’s and all 20 of them fall within
133 the “R3” (Illinois “Restore Reinvest Renew” program) definition of EIECs. *Id.* at 17:7-9.

134 **Q. What is your response to Mr. Howat’s claim that ComEd’s original proposed**
135 **Affordability metric in various ways is insufficiently targeted at households that are**
136 **low-income and/or located in EJC’s or EIECs, and to the similar statement of Staff**
137 **witness Joan Howard (Staff Ex. 6.0, 4:59-70)?**

138 **A.** Reducing arrearages, as provided for in ComEd’s original proposed Affordability metric,
139 by its nature, is likely to reduce the number of customers eligible to be disconnected by
140 better connecting struggling customers with available assistance, which makes it more
141 likely to benefit customers with lower incomes and, to the extent that such customers are
142 more likely to reside in EJC’s or EIECs, then also to benefit those communities. Whether
143 something is “targeted” to help a group is not the same thing as whether it designed in a
144 manner that will help that group. I do not wish, however, to engage in a lengthy discussion

145 that seems unnecessary given ComEd's revision of this metric in alignment with
146 Mr. Howat's feedback. ComEd's adjustments to this metric, through use of Mr. Howat's
147 proposed performance metric (with a slight modification), directly relates to EJC's and
148 EIECs, as indicated above.

149 **Q. What is your response to Mr. Howat's claim that ComEd's original proposed**
150 **Affordability metric is not designed to reward exceptional performance?**

151 **A.** I disagree. ComEd based its proposed targets for its original metric proposal on historic
152 performance, taking into account that there are many factors that could result in varying
153 arrearage results. The targets proposed for the original Affordably metric are not fully
154 achievable without new actions by ComEd. For example, from 2014-2019, the years on
155 which the original metrics' 2% annual target was based, ComEd would have missed the
156 target in multiple years. Specifically, as shown in ComEd's Response to Data Request
157 ("DRR") AG-1.08(a) in ComEd Ex. 8.01, ComEd would have missed the 2% annual
158 decrease in 90-day customer arrearages target in 2016 and 2017. Therefore, if ComEd
159 meets its originally proposed Affordability metric's goals, its performance would have had
160 to be exceptional.

161 **Q. What is your response to Mr. Howat's proposal that ComEd's original Affordability**
162 **metric should be replaced by his proposed Affordability performance metric that is**
163 **based on a 10% annual reduction over a four-year period (2024-2027) in residential**

164 **disconnections for nonpayment in the 20 zip codes in ComEd's service territory with**
165 **the highest 2017-2019 disconnection for non-payment ratios?**

166 A. ComEd intends to continue to assist customers through the activities contemplated under
167 its original proposed Affordability metric, but also ComEd agrees to utilize COFI witness
168 Mr. Howat's proposed Affordability performance metric as the measure of ComEd's
169 performance, with the aforementioned modification.

170 Q. **What do you mean when you say that "ComEd has concluded that it should continue**
171 **to assist customers through the activities contemplated under its original proposed**
172 **Affordability metric"?**

173 A. I mean three things. First, and most importantly, ComEd believes that the actions
174 contemplated to achieve its original proposed Affordability metric will benefit customers
175 and will be suitable for achieving Mr. Howat's proposed Affordability metric.

176 Second, reducing arrearages by better connecting struggling customers with
177 available assistance is likely to reduce the number of customers eligible to be disconnected.
178 This effort will be more likely to benefit customers with lower incomes and, to the extent
179 that such customers are more likely to reside in EJC's or EIECs, then also to benefit those
180 communities. By focusing on connecting the customers with available assistance, ComEd
181 can help customers avoid out-of-control arrearages, take control of their bills, and make
182 sure state and federal assistance dollars are not left on the table.

183 Third, to some degree, Mr. Howat's testimony recommends extensive ways to
184 achieve his proposed Affordability metric (*i.e.*, activities), but this is a docket to establish
185 performance metrics (*i.e.*, outcomes), and not how the utility will work to achieve those

186 metrics targets (*i.e.*, activities). At the end of the day, the utility is the party whose
187 performance will be assessed.

188 **Q. Now that ComEd has adopted Mr. Howat's proposed Affordability metric, is ComEd**
189 **adopting Mr. Howat's suggestion to increase the allocated bps to 10 bps for penalties**
190 **and incentives, rather than the 5 bps as originally proposed by ComEd? COFI Ex.**
191 **1.0 CORR, 5:8-10.**

192 **A.** Yes. ComEd believes that Mr. Howat's proposed metric, as modified by ComEd, provides
193 significant potential benefits for its customers, particularly those in EJC's and R3
194 communities. Therefore, ComEd is increasing the allocated bps to 10 bps. The subject of
195 basis points allocation is addressed by the Rebuttal Testimony of Chad Newhouse (ComEd
196 Ex. 4.0). Note that this increase in basis points is contingent on Commission approval of
197 this Affordability metric, as presented in my Rebuttal Testimony, without further
198 alterations.

199 **Q. Are the other recommendations made by COFI witness Mr. Howat within the scope**
200 **of this docket?**

201 **A.** No. While I am not a lawyer, it seems to me that significant portions of Mr. Howat's Direct
202 Testimony do not seem to be pertinent to the subject matter of this docket. For example,
203 he offers what appear to be general critiques of ComEd's credit and collection practices
204 and argues for changes that should be made in them (*e.g.*, COFI Ex. 1.0 CORR, 4:16-20),
205 sometimes framed as arguments in support of his proposal but seeming more to be
206 commentary on the practices. *See, e.g., id.* at 12:27, *et seq.* Because those suggestions
207 seem better discussed in other forums, I am not responding to them as such in my Rebuttal

208 Testimony, except to the extent that I address them in the course of discussing ComEd's
209 and COFI's proposed metrics.

210 Q. **Does Staff witness Ms. Howard support ComEd's original proposed Affordability**
211 **metric?**

212 A. Not at this time. Ms. Howard expresses concerns that: (1) it is not clear whether the metric
213 is achievable; (2) reducing arrearages should not be achieved by shifting the burden to
214 increased uncollectible expense or disconnections; (3) setting a target based on the prior
215 year can yield a structure that permits "backsliding" (and she feels it is unclear how the
216 target is set); and (4) ComEd should explain what it means when it refers to connecting
217 customers to assistance. Staff Ex. 6.0, 4:59-70, 6:99-8:142.

218 Q. **How do you respond to Ms. Howard's stated concern about whether the metric is**
219 **achievable?**

220 A. This original proposed Affordability metric is exactly that: a performance metric. ComEd
221 believes it to be achievable, but, if not, understands that there may be consequences in
222 terms of foregone incentives or even penalties.

223 While Ms. Howard has not yet had the opportunity to ask the same question about
224 the modified metric presented in my rebuttal, I can state that ComEd believes it is also
225 achievable but, if not, understands that there may be consequences in terms of foregone
226 incentives or even penalties.

227 Q. **How do you respond to Ms. Howard’s view that reducing arrearages should not be**
228 **achieved by shifting the burden to increased uncollectible expense or disconnections?**

229 A. ComEd agrees with Ms. Howard and does not plan to accelerate disconnections in order to
230 meet the proposed metric (under its original proposal and its rebuttal position). In fact,
231 disconnecting customers prior to their arrearage reaching 90 days would not help achieve
232 the metric. Customer arrearages are not written off until 90 days after the customer is
233 disconnected. The customer receivable will continue to age until it is charged off, as
234 explained in ComEd’s Rider UF reconciliation docket testimony (ICC Docket
235 No. 21-0646, Chu Dir., ComEd Ex. 3.0 at 28:593-595). ComEd believes that a decrease
236 in disconnections would be the result of successfully achieving the proposed metric.
237 ComEd’s goal is to connect customers with energy efficiency and financial assistance
238 options so that they can manage their arrearage and make energy more affordable.

239 Q. **How do you respond to Ms. Howard’s concern about potential “backsliding”?**

240 A. ComEd’s rebuttal position advocates first for use of COFI’s proposed Affordability metric
241 to measure ComEd’s performance. COFI’s proposal provides for 10% annual reductions
242 over a 4-year period, which would not be affected by the prior year’s performance.
243 However, with respect to the alternative of ComEd’s original proposed Affordability
244 metric, ComEd would be open to a reasonable and fair structure that has annual targets set
245 in a manner that addresses Ms. Howard’s concern.

246 Q. **What does ComEd mean, in the context of the Affordability metric, when it refers to**
247 **connecting customers with assistance?**

248 A. When referring to connecting customers with assistance, ComEd strives to increase
249 outreach to customers, especially to those of limited income or those living in areas known
250 to be of limited income. The purpose of this outreach is to educate customers on available
251 programs (financial assistance and energy efficiency), eligibility, and resources to apply.
252 Communication to customers can be done directly by ComEd or via partnership with state
253 and local government and community partners.

254 Q. **Does IIEC witness Mr. Stephens support ComEd's original proposed Affordability**
255 **metric?**

256 A. No. Mr. Stephens' testimony: (1) criticizes ComEd's original proposed Affordability
257 metric for not providing a plan for meeting its proposed goals under its original proposed
258 Affordability metric, (2) asserts that the original proposal sets too low a baseline, and
259 (3) asserts that the proposal does not provide cost / benefit information related to its plan
260 and goals. IIEC Ex. 1.0, 5:100-103, 39:662-679.

261 Q. **What is your response to Mr. Stephens' complaint about ComEd not yet having a**
262 **plan to achieve the targets of the Affordability metric?**

263 A. As I mentioned before in response to Mr. Howat's suggestions about credit and collection
264 activities, this is a docket to establish performance metrics (*i.e.*, outcomes) and not how the
265 utility will work to achieve those metrics targets (*i.e.*, activities). With that said, ComEd
266 has identified many actions it takes now, including a new step (employing a dynamic
267 collection threshold, where customers with past due balances greater than two times their

average monthly bills will receive a disconnection notice) taken in March 2022, to assist customers with avoiding and reducing arrearages. For example, ComEd offers, and plans to continue offering, its Smart Assistance Manager (“SAM”) to help match customers with assistance options, waivers of late payment charges and deposits for low-income customers, Supplemental Arrearage Reduction Program (“SARP”), and a continues to focus on customer advocacy and outreach to connect customers to available assistance and energy efficiency programs. While ComEd currently does not anticipate making major changes in its outreach practices and activities, it is too soon to expect the utility to have made all of its plans firmed up now for 2024 and beyond. To do so seems inconsistent with the very nature and objectives of setting performance metrics, which should encourage utility innovation and flexibility as well as making better or re-targeted use of existing resources. *See, e.g.*, ComEd DRRs AG 1.08 and IIEC 2.12, provided in ComEd Ex. 8.01.

Q. What is your response to Mr. Stephens regarding the baseline of the original proposed Affordability metric?

A. The baseline of the original proposed Affordability metric is reasonable. ComEd utilized an average from 2017 to 2019 to establish the baseline. Because there are many factors that can influence customer arrearages, outliers such as 2020 (due to the Covid-related credit and collection moratorium) were removed from the baseline calculation.

286 Q. **What is your response to Mr. Stephens regarding his complaint about ComEd not**
287 **providing cost / benefit information related to its plan and goals?**

288 A. Mr. Stephens' concerns should be alleviated with the introduction of panel Rebuttal
289 Testimony from Ralph Zarumba and James Shields of Black & Veatch (ComEd Ex. 11.0)
290 on the subject of cost-benefit analysis.

291 But to address Mr. Stephens' specific concerns, starting with incremental costs,
292 based on ComEd's preliminary (tentative) judgment, ComEd anticipates that this
293 performance metric (as originally proposed and as of the rebuttal position) currently is not
294 expected to have material incremental costs, although some information technology
295 changes might be needed and, if so, they would incur some costs. While the steps that
296 ComEd will take to try to connect customers to more assistance has not yet been finalized,
297 ComEd has identified a number of planned steps in subpart (h) of ComEd's Data Request
298 Response to AG 1.08, provided as ComEd Ex. 8.01. *See also* ComEd's Data Request
299 Response to IIEC 2.12, provided as ComEd Ex. 8.01. ComEd, subject to its objections,
300 also previously has stated, however, that: "ComEd has not estimated its annual costs of
301 achieving its performance goals for this metric (in terms of how current budgets might be
302 affected (including changes in allocations) or incremental costs due to the metric). ComEd
303 does not expect any significant systems or people changes to support this metric. As
304 customer education plans are further developed, costs associated with customer outreach
305 may increase." See subpart (i) of ComEd Data Request Response to AG 1.08, provided in
306 ComEd Ex. 8.01. ComEd currently believes that the possible incremental costs of
307 increased customer outreach are somewhat likely to be incurred, as indicated above, but
308 that they are speculative in amount at this time.

309 With respect to benefits, the efforts that ComEd plans to undertake will benefit
310 individual customers in terms of reduced risks of disconnections and in qualitative terms
311 and may benefit customers as a whole in terms of reduced uncollectibles expense and
312 possibly reduced costs associated with disconnection processes such as field calls.

313 Q. **Does JSP witness Mr. Rábago's Direct Testimony address the Affordability metric?**

314 A. Mr. Rábago's testimony makes only general claims about how distributed energy resources
315 might benefit disadvantaged customers and communities. *See, e.g.,* JSP Ex. 1.0,
316 37:707-715. That discussion does not seem pertinent to the Affordability metric.

317 **C. Financial Assistance Outreach & Education Tracking Metric**

318 Q. **Please briefly summarize ComEd's January 20, 2022, filing's proposed Financial**
319 **Assistance Outreach & Education tracking metric**

320 A. In brief, the proposed Financial Assistance Outreach & Education tracking metric measures
321 outreach to customers regarding financial assistance, including its availability, eligibility,
322 requirements, and means to apply.

323 Q. **In her Direct Testimony, did Staff witness Ms. Howard indicate agreement with**
324 **ComEd's proposed tracking metric?**

325 A. Ms. Howard indicated that she is not opposed to tracking such information, but she
326 recommends that ComEd explain what information it currently collects, what additional
327 information will be collected, and how all the data will be used to evaluate the success of
328 its outreach and education efforts. Staff Ex. 6.0, 12:237 – 13:241. She also expressed the

similar question whether ComEd intends the tracking metric to be used to measure or achieve any of its proposed performance metrics. *Id.* at 13:243-248.

Q. What is your response to Ms. Howard's questions?

A. In its original metric proposal, ComEd planned on utilizing tracking metrics to collect data on the activities related to the metric. ComEd believes that outreach and education to customers on financial assistance and energy efficiency programs will benefit customers and ultimately help achieve the new proposed performance metric.

Q. What is the position of CUB/EDF witness Mr. Barbeau on this proposed tracking metric?

A. As I understand Mr. Barbeau's testimony on lines 1268-1275 of his Direct Testimony (CUB/EDF Ex. 1.0), this tracking metric is swept up into his general position that all of ComEd's proposed performance and tracking metrics should not be approved. He does not appear to present any specific discussion of this tracking metric.

Q. What is your response to Mr. Barbeau?

A. Mr. Barbeau's testimony does not appear to present facts or analysis of this specific proposed tracking metric and therefore is not a reason to reject ComEd's proposed tracking metric.

III. CONCLUSION

Q. Does this complete your Rebuttal Testimony?

A. Yes.