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June 17, 2021

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 G Street N.W., Suite 800  
Washington, DC 20005

**Re: Formal Case No. 1160**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's ("Pepco") Motion for Enlargement of Time to File for Approval of Energy Efficiency and Demand Response Program, in the above-referenced proceeding.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

*/s/ Dennis P. Jamouneau*

Dennis P. Jamouneau

Enclosures

cc: All Parties of Record

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

<b>In the Matter of the Application of Potomac</b>	)	
<b>Electric Power Company for Authority to</b>	)	<b>Formal Case No. 1160</b>
<b>Implement a Multiyear</b>	)	
<b>Programs Pursuant to Section 101(B) of the</b>	)	
<b>Clean Energy DC Omnibus Amendment Act</b>	)	

**MOTION FOR ENLARGMENT OF TIME TO FILE FOR APPROVAL OF  
ENERGY EFFICIENCY AND DEMAND RESPONSE PROGRAM**

Pursuant to Section 201(B) of the Clean Energy DC Omnibus Amendment Act (“CEDC Act”), 8 D.C. Code Section §1774.07(g)(1), Potomac Electric Power Company (“Pepco” or the “Company”) is permitted to file for approval of an energy efficiency and demand response program. Order No. 20654 requires Pepco to file its proposal by June 27, 2021.<sup>1</sup> As part of the CEDC, Pepco may apply to the Commission to offer energy efficiency and demand reduction programs in the District that the Company can demonstrate are not substantially similar to programs offered or in development by the DCSEU, unless the DCSEU supports such programs.<sup>2</sup>

Pepco, the Department of Energy and the Environment (“DOEE”), and the DC Sustainable Energy Utility (“DCSEU”) have met numerous times over the past two years since the enactment of the CEDC Act. These parties continue to collaborate and make progress on program structures that will help the District of Columbia reach its climate change mandates, of which energy efficiency will play an integral part. However, more time is needed to reach agreement on areas of Pepco’s proposed programs that may be considered as “substantially similar” to DCSEU

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<sup>1</sup> Order No. 20654 at P 98.

<sup>2</sup> 8 D.C. Code Section 1774.07(g)(4).

programs. Accordingly, and as set forth below, Pepco respectfully requests an enlargement of time until August 2, 2021 to file its energy efficiency and demand response program proposal.

### **I. Motion for Enlargement of Time to File Energy Efficiency and Demand Response Program Proposal**

Pursuant to Rules 105.8 and 117.5<sup>3</sup> of the Commission’s Rules of Practice and Procedure, Pepco respectfully moves for an enlargement of time to file its proposed energy efficiency and demand response program with the Commission. As noted above, while Pepco, DOEE, and the DCSEU have conscientiously and consistently met and discussed program options at length, additional time is needed. The additional time will assist Pepco is securing the consent of the DCSEU, which is required by District law for proposed programs that may be considered “substantially similar” to those operated by the DCSEU.

Moreover, and while Pepco is sensitive to the fact that timing is critical considering the targets for clean energy under District law, a modest extension of approximately one month – until August 2, 2021 – will not prejudice any party. Rather, the additional time is intended to aid administrative efficiency by discussing potentially contentious issues beforehand rather than in public comments. Additionally, Pepco can represent that DOEE, the DCSEU, and OPC do not oppose this motion.

### **II. Conclusion**

Pepco hereby moves for an enlargement of time to August 2, 2021 to file for approval of its proposed energy efficiency and demand response programs.

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<sup>3</sup> 15 DCMR Section 105.8 and 117.5 (2011).

Respectfully submitted,

**POTOMAC ELECTRIC POWER COMPANY**

By: /s/ *Dennis P. Jamouneau*  
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Washington, DC  
June 17, 2021

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Motion for Enlargement of Time was served this June 17, 2021 on:

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