

**ELECTRONIC FILING**

July 28, 2021

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

**Re: Formal Case No. 1160 -- In the Matter of the Development of Metrics for Electric Company and Gas Company Energy Efficiency and Demand Response Programs Pursuant to Section 201 (B) of the CleanEnergy DC Omnibus Amendment Act of 2018.**

Dear Ms. Westbrook-Sedgwick:

The Sustainable Energy Utility Advisory Board (D.C. Official Code § 8–1774.03) submits the enclosed Comments on Potomac Electric Power Company's ("Pepco's") proposed Energy Efficiency and Demand Response (EEDR) Programs in the District. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

By: /s/ Bernice Corman  
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Chair, Sustainable Energy Utility Advisory Board  
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cc: Donna Cooper, Pepco Region President  
Megan Partridge, Pepco Manager, Energy Efficiency and Demand Response Programs  
Ted Trabue, Director, DCSEU  
Tommy Wells, Director, DC Department of Energy and Environment

July 28, 2021

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission of the District of Columbia  
1325 G Street, NW, 8<sup>th</sup> Floor  
Washington, DC 20005

**Re: Formal Case No. 1160**

Dear Ms. Westbrook-Sedgwick:

Please include this report by the District of Columbia Sustainable Energy Utility Advisory Board (“SEU Advisory Board” or “Board”) among the materials to be reviewed by the Public Service Commission in conjunction with the Potomac Electric Power Company’s (“Pepco’s”) proposed Energy Efficiency and Demand Response (EEDR) Programs.

8 D.C. Code § 1774.07(g)(4) provides:

[Pepco], after consultation and coordination with the Department of Energy and the Environment and the District SEU and its advisory Board, 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 SEU, unless the SEU supports such programs.

On October 30, 2020, the Commission, in ruling on recommendations filed by the FC1160 Working Group, added:

The CleanEnergy DC Act requires that the utility show that a proposed program is not “substantially similar” to those offered by the DCSEU. The Commission adopts the Working Group’s proposal that the utilities: (1) present their EEDR proposals to DOEE, DCSEU, and the SEU Advisory Board prior to filing an Application with the Commission; and (2) include the date of presentation of programs to DOEE, DCSEU, and SEU Advisory Board in the application that is filed with the Commission. Specifically, we believe that review and comment by the DCSEU on a proposed program provides the utility with a direct route to learning whether a proposed EEDR program is duplicative of a DCSEU program or is not complimentary to its program.

Order No. 20654 (Oct. 30, 2020), ¶ 88.

The SEU Advisory Board wishes to report that Pepco generally met its obligation to consult and coordinate with the Board,<sup>1</sup> and following initial consultations, made certain modifications to its proposed programs in part in response to some of the Board's concerns.

The Board reserves its right, and individual Board members reserve their individual rights, to provide further comment on Pepco's proposed EEDR programs in the forthcoming PSC-administered comment period thereon.

Sincerely,



Bernice I. Corman  
Chair, SEU Advisory Board

CC:

Donna Cooper, Pepco Region President

Megan Partridge, Pepco Manager, Energy Efficiency and Demand Response Programs

Ted Trabue, Director, DCSEU

Tommy Wells, Director, DC Department of Energy and Environment

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<sup>1</sup> As of the date of the preparation of this document, Pepco had agreed to provide the Board with additional information on its proposed programs, including more granular information on the budget for same.