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August 8, 2022

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: RM48

Dear Ms. Westbrook-Sedgwick:

Attached please find Potomac Electric Power Company's Initial Comments in the above-referenced matter.

If you have any questions or concerns, please do not hesitate to contact me.

Sincerely,

/s/ *Dennis P. Jamouneau*

Dennis P. Jamouneau

Enclosures

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF	**)**	
DCMR – CHAPTER 48 -	**)**	**RM-48-2022-01**
MICROGRIDS	**)**	

INITIAL COMMENTS OF POTOMAC ELECTRIC POWER COMPANY

Pursuant to the Notice of Proposed Rulemaking issued in the above-captioned proceeding on July 8, 2022 ("NOPR"), Potomac Electric Power Company ("Pepco" or the "Company") files its initial comments, which are organized by topic, below.

I. Introduction

Pepco is committed to advancing the resiliency of the District and to taking actions that support the clean energy goals articulated in the CleanEnergy DC Act[1] and DOEE's CleanEnergy DC Plan.[2] The Commission's PowerPath DC and Climate Solutions Plan processes demonstrate that Pepco and District stakeholders share a common vision for the future—one in which the utility's distribution system and related infrastructure serve as a platform for Distributed Energy Resources ("DERs") and other clean energy solutions that create greater connectivity, advance innovation, maintain affordability, promote social equity, and support continued high levels of reliability and resiliency. To enable these goals, the Company continues to invest in initiatives that enable clean energy resources, reduce greenhouse gas ("GHG") emissions, and enhance community resilience efforts. The Company's focus remains squarely on achieving the identified clean energy, GHG reduction, and resilience goals in a manner that ensures safe, reliable, and

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[1] DC Law 22-257, CleanEnergy Omnibus Amendment Act of 2018, https://code.dccouncil.us/dc/council/laws/22-257.html, accessed on September 14, 2020.

[2] https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Clean%20Energy%20DC%20-%20Full%20Report_0.pdf , accessed on September 14, 2020.

affordable service for its District of Columbia customers.

Pepco's distribution system in the District has become increasingly distributed and interconnected with clean energy and GHG-reducing solutions, which is in alignment with the District's leading clean energy goals. This evolution has all occurred because of stakeholder investment in the District's clean energy future and a District regulatory regime that allows for development of innovative solutions and processes to integrate new technologies into the distribution system, thus supporting the District in meeting its clean energy, climate, and resilience goals while maintaining customer protections. The standards and processes embedded in the Commission's regulatory approach represent decades of learning regarding how to meet the needs of customers within a constantly evolving electric system. This proceeding should use those standards and processes as a foundation and build on them, to the extent necessary.

With this as background, Pepco supports integrating microgrids as a resilience solution and appreciates the Commission's focus on adopting new technologies while also maintaining the strong and critical customer protections that exist under current law and Commission regulations. Pepco's comments, which follow this introduction, reinforce the Commission's focus and, where identified, seek to modify or clarify certain proposed regulations to allow for a more seamless transition for customers and developers that desire to form or be part of microgrids in the District of Columbia. Pepco appreciates the opportunity to provide these comments.

II. Comments on the NOPR

A. The NOPR appropriately focuses on integrating microgrids into the distribution system and maintaining continued, robust customer rights and protections.

i. Protections guaranteed to customers by statute and regulation should be maintained.

Customers expect and deserve to continue enjoying the protections District law and Commission regulations afford them. Those protections are increasingly important as the District

transitions from known, well-established processes to introducing services, technologies, and DER configurations that are less proven and established. Current customer protections include those guaranteed in the Customer Bill of Rights ("CBOR")[3] for residential customers and Chapter 18 of the Commission regulations for Commercial customers[4] as well as the service-level requirements in the Commission's Electricity Quality of Service Standards ("EQSS") and Pepco's own General Terms and Conditions, which benefit all of Pepco's customers. These customer protections ensure that end-use customers benefit from known and regulated quality-of-service standards while also having adequate recourse in the event that the relevant standards are not met. Moreover, the critical roles—as defined by statute—that the Commission and the Office of People's Counsel for the District of Columbia ("OPC") play in maintaining those customer protections ensure the appropriate oversight and responsibility that customers are guaranteed and have come to expect.

The roles of the Commission and OPC, the rights of end-use customers, and the responsibilities of either the incumbent Electric Distribution Company ("EDC," and in these comments Pepco will be referred to as the EDC or incumbent EDC) or the electric company serving multiple customers should not change because of the introduction of new types of services, DER configurations, or other resources into the distribution grid. Pepco supports the NOPR's dual focus on developing a regulatory framework for microgrids while continuing to ensure customers have the protections the law currently provides them.

Pepco also generally supports[5] how the Commission has characterized and defined the types of microgrids both in Order No. 21172 ("Order") and the definition of Multiple Customer Microgrid in the NOPR. In the case of a Single Customer Microgrid, customer rights and

[3] 15 D.C.M.R. Chapter 3.
[4] 15 D.C.M.R. Chapter 18.
[5] As qualified or explained in these Comments.

protections are unchanged in most cases and are the responsibility of the incumbent EDC. However, for Multiple-Customer Microgrids, the Commission has determined that these microgrids are electric companies and must, therefore, shoulder the responsibilities inherent in such a classification.[6] Pepco supports these determinations. Similarly, Pepco generally supports the regulatory requirements found in Sections 4806 through 4809 in the NOPR. The regulations appropriately ensure that end-use customers of Multiple Customer Microgrids would not lose customer protections guaranteed to them by law and Commission regulations.

ii. The Commission should expand the definition of Multiple Customer Microgrids to exempt these entities if the incumbent EDC owns, maintains, and operates the Microgrid's distribution assets.

While the Company supports the recognition that microgrids with single customers and Multiple Customer Microgrids require different regulatory treatment given that Multiple Customer Microgrids serve multiple end-use customers, there are two distinct types of Multiple Customer Microgrids that deserve differing regulatory treatment. The Commission should either modify the proposed definition of Multiple Customer Microgrids or adopt a separate definition for Multiple-Customer Microgrids in which the EDC owns, maintains, and operates the distribution system within that Microgrid. Pepco proposes that a modified definition of Multiple Customer Microgrid be adopted as follows:

> means a Microgrid that has a single DER or multiple DERs serving multiple customers on multiple meters that may have their own individual connections to the Electric Distribution System and the Microgrid through a Point of Common Coupling. A Microgrid is not considered a Multiple Customer Microgrid and subject to regulatory requirements, except for Sections 4802 and 4803 of these Regulations, if the incumbent Electric Distribution Company owns, maintains, and

[6] Order at P 18.

operates the distribution system within the Microgrid because the Microgrid is no longer an Electric Company.

Pepco's proposal would generally exempt a Multiple Customer Microgrid where the incumbent EDC owns, maintains, and operates the distribution system from the regulations and responsibilities proposed in the NOPR—in effect, treating the microgrid as a Single Customer Campus Microgrid for regulatory purposes. Customers would benefit from the continuity of being served by the microgrid while still enjoying the reliability of the Pepco system and the familiarity of Pepco billing and other customer service agreements, among others. Microgrid Operators would benefit from not being subject to the extensive requirements of being considered an Electric Company.

iii. The definition of Single Customer-Campus Microgrid should be clarified to ensure the rights and protections required for end-use customers are not diminished.

Pepco generally supports the definition for a Single Customer-Campus Microgrid as proposed in the NOPR and fully supports the reasoning detailed in the Order, which explains the intent of not fully regulating Single Customer-Campus Microgrids.[7] However, the Commission should further clarify the definition of Single Customer-Campus Microgrid to ensure that end-use customer rights are not unintentionally diminished.

As background, District law defines customer as:[8]

> a purchaser of electricity for end use in the District of Columbia. The term excludes an occupant of a building where the owner, lessee, or manager manages the internal distribution system serving the building and supplies electricity solely to occupants of the building for use by the occupants.

Accordingly, based on the law, which cannot be changed in the regulatory process, a customer is any end-user that buys electricity unless that person occupies a premise in which some other entity

[7] Order at P 10.
[8] 34 D.C. Code Section 1501(12).

or person manages the electricity supply for that *building*. Moreover, and as described in more detail above, "customers" are afforded certain rights, such as those found in Commission regulations, Pepco's General Terms and Conditions, and the service-level standards the Commission has established.

As proposed in the NOPR, a Single Customer-Campus Microgrid would consist of "a single DER or multiple DERs serving multiple facilities controlled by one meter at the Point of Common Coupling."[9] The Order, in contrast, provides far more detail and explains that a Single Customer-Campus Microgrid:

> could have an integrated system of DERs serving multiple facilities, served by one meter at the point of common coupling ("PCC"). These single customer-campus microgrids are connected to and can island from the electric distribution system to serve some or all of the single customer-campus's existing load. An example of a single customer-campus microgrid is one where an integrated system of DERs serves a campus setting such as a college or a university, a healthcare/hospital campus, or a military base.[10]

The Order's detailed explanation is more aligned with the statutory definition of customer because it limits the definition of Single Customer-Campus Microgrid to a common place and/or common purpose. The examples provided in the Order, such as a military base or hospital campus, make sense in this context, and Pepco supports the lack of direct and full regulation of these microgrids because they will receive customer protections from the incumbent EDC as a single customer of the incumbent EDC. Alignment with the statutory definition of customer is critical because if a microgrid consists of multiple "customers," the Commission would have to regulate the Microgrid,

[9] NOPR Section 4899.1. Pepco further notes that each of the classifications of microgrids should begin by stating that they are a Microgrid to make certain that the arrangement proposed also meets the standards as proposed under the definition of "Microgrid," which is included in the same section.

[10] Order at p. 10.

and the Microgrid Operator would be subject to regulations that ensure the customers within the Microgrid retain protections afforded to them by law.

By contrast, the less-detailed definition of Single Customer-Campus Microgrid in the NOPR is far more subjective, potentially limiting or diminishing customer rights and protections. The ambiguity in the definition will lead to situations in which Microgrid Operators, not wanting to be regulated as an Electric Company, will describe the electrical configuration as a "campus" even though the configuration involves multiple customers and should be regulated as an Electric Company. This particular situation would diminish customers' lawful protections. While Pepco acknowledges that definitions and classifications of the three types of microgrids included in the Order and NOPR must be read in context, the NOPR definition, when it becomes a final rule, should be unambiguous so that customers, the EDC, and developers fully understand the obligations assumed under the Single Customer-Campus Microgrid configuration.

In addition, the Single Customer-Campus Microgrid definition in the NOPR must be modified to incorporate the concept of islandability into the definition. As written, an NEM customer with multiple buildings, for example, could qualify as a Single Customer-Campus Microgrid. This clarification can be achieved by incorporating the defined term "Microgrid" into the definition, as the NOPR has done in the case of the Multi-Customer Microgrid definition.[11]

Pepco recommends that the Commission adopt modifications to the proposed definition of Single Customer-Campus Microgrid, as shown below.

> A Microgrid consisting of a single DER or multiple DERs serving multiple facilities, all of which are owned or controlled by a common entity and for a common purpose and are interconnected ~~controlled by one meter~~ at the Point of

[11] The same modification is necessary for the definition of "Single Customer Microgrid."

Common Coupling. Examples of a common entity or common purpose include, but are not limited to, a hospital campus or military base.

Pepco's proposed modifications achieve the dual purpose of the NOPR: integration of new technologies and services and maintaining customer rights and protections. This proposed modification also contains the clarity in the Order as to when unregulated microgrids are permissible. Finally, Pepco's proposed modifications align with the statutory definition of "Customer" because they would exclude from the definition of Single Customer-Campus Microgrid other types of Microgrids that would serve multiple end-use customers.

iv. Proposed Section 4803.5 should explain how customer rights are affected and whether Pepco or the Multiple-Customer Microgrid Operator is responsible under various scenarios.

Proposed Section 4803.5 discusses how the EDC and Microgrid Operator would collectively function during "abnormal conditions" and suggests that these issues be included within the Microgrid Interconnection Agreement.[12] This proposed section raises other important issues that require further modifications and clarifications from the Commission. Clarification of these issues is particularly important because removing ambiguity will provide customers, the EDC, Multiple-Customer Microgrid Operators, OPC, and the Commission a clear understanding

[12] The Commission should consider adding a definition specifying what are or could be considered "abnormal conditions" but at a minimum the regulation should include reference to IEEE 1547-2018, Sections 6-8, which specify the actions a DER system must undertake in response to abnormal conditions. In proposed Section 4803.5, the draft regulation states that abnormal conditions are those conditions "including but not limited to unintentional islanding, loss of synchronism, abnormal conditions of voltage, power flow, or frequency at the Point of Common Coupling, or in any section of the Microgrid or the surrounding of the utility in the Microgrid Interconnection Agreement."

of which entity has what responsibility under what circumstances and where customers can go for redress in the event of a dispute or customer service issue.

Specifically, the NOPR should define the general roles and responsibilities of a Microgrid Operator in a Multiple-Customer Microgrid[13] and the EDC under various scenarios, including when a Microgrid is operating (1) in parallel with the distribution system; (2) in "abnormal conditions;" and (3) in islanded mode. The applicable responsibilities include customer protections, including EQSS obligations, RPS requirements, and customer rights, such as those under CBOR.[14]

In the case of a Multiple-Customer Microgrid in which the EDC does not own the distribution infrastructure within the microgrid, Pepco generally agrees with the NOPR that the Microgrid Operator would be responsible for compliance with the myriad regulatory responsibilities inherent in being an electric company, including the RPS, EQSS, and customer protection regulations. However, it is equally important that the NOPR define under what circumstances the Microgrid Operator would be permitted to inject energy into the larger grid (in front of the PCC or customer meter).

Where the EDC owns the distribution infrastructure within the Multiple-Customer Microgrid it is more nuanced and raises some questions that need to be further developed. Specifically, it would seem that the EDC would maintain responsibility for the RPS, EQSS, and customer rights and protections under most circumstances, including when the microgrid is not

[13] Aligning with the NOPR, Pepco does not propose that a Single Customer Microgrid or a Single Customer-Campus Microgrid have any responsibilities under the EQSS, RPS, or CBOR/customer rights because these responsibilities remain with the incumbent EDC. In addition, the two "single customer" microgrid classifications should be permitted to export or "inject" energy produced by the microgrid generator as permitted under existing regulations and interconnection agreements.

[14] The Customer Bill of Rights (CBOR), which is Chapter 3 of the Commission's regulations, applies only to Residential customer rights. In this section, the reference to CBOR is intended to include all customers, including Commercial customers.

islanded or when the microgrid is islanded in emergency situations, such as in response to a local outage. However, when a Multiple-Customer Microgrid with EDC-owned distribution infrastructure islands under non-emergency conditions (e.g., voluntarily islands while the EDC distribution system is not experiencing an outage), it would seem that the Microgrid Operator would be responsible for RPS, EQSS, and customer rights and protections. These are issues that Pepco, the Commission and other stakeholders will need to consider further. Again, it is also important to define when the Multiple-Customer Microgrid should be permitted to inject generation into the broader distribution grid in circumstances where the EDC owns the distribution infrastructure. Definition of roles and responsibilities for the EDC and the Microgrid Operator and the circumstances under which the Microgrid can inject generation back into the grid are important issues that require further consideration and definition and are not sufficiently delineated and defined in the NOPR.

v. The proposed definition of "Customer" should be removed from the NOPR and the definition of Microgrid Customer should be adjusted.

The Commission should remove the proposed definition of "Customer" from the NOPR because it is unnecessary and is likely to cause confusion. The word "Customer" appears in numerous instances within the NOPR, including Section 4899.1, which defines "Customer" as "[] any Person who consumes Electric Services from a Multiple Customer Microgrid." The proposed definition of "Customer" is unnecessary because both the statute and Commission regulations already define "Customer."[15] It appears that the proposed definition is meant to enforce the idea that the end-use customers of a Multiple-Customer Microgrid become "Customers" of that new electric company, but that protection already exists by law and regulation simply because they are

[15] *See, e.g.*, 34 D.C. Code Section 1501(12)

end-use customers of that Multiple-Customer Microgrid, as an electric company. Moreover, the definition of Microgrid Customer already serves that purpose. As such, Pepco recommends the definition be removed.

Equally important, the definition of "Microgrid Customer" must be modified to make clear that it only applies to end-use customers within the bounds of the microgrid.[16] Microgrid Customer is defined as

> any Person who consumes or uses electric power provided by a Microgrid, including an occupant of a building where the owner, lessee, or manager manages the internal distribution system serving the building and supplies electricity solely to occupants of the building for use by the occupants.

The current phrase "any Person who consumes or uses electric power provided by a Microgrid" could include Customers of the incumbent EDC that consume power that was exported from the Microgrid. The Commission's clear intention with this definition is to make it apply only to customers within the Microgrid. To ensure that there is no ambiguity as to whether the incumbent EDC or the Microgrid are responsible for the protections afforded customers, the definition should be modified to include the phrase, "within the Microgrid," as shown below.

> any Person <u>within the Microgrid</u> who consumes or uses electric power provided by a Microgrid, including an occupant of a building where the owner, lessee, or manager manages the internal distribution system serving the building and supplies electricity solely to occupants of the building for use by the occupants."

Further, throughout the NOPR, the Commission should only use the defined term "Microgrid Customer" when referencing the end-use customers within the Microgrid.

With the revisions above, the Commission will clearly delineate the customers within and

[16] Note, however, that depending on the Commission's determination with respect to Pepco's proposed modification to the definition of Multiple Customer Microgrids and the companion issue related to responsibilities for EQSS, RPS, and customer rights under different circumstances, a Microgrid Customer may have rights with respect to the EDC and/or the Microgrid Owner/Operator under certain conditions.

outside of the Microgrid, making the responsibilities for customer protections unambiguous as between the Microgrid and the incumbent EDC.

B. Certain portions of the NOPR require additional modification or clarification.

i. Proposed Section 4801.4 should be removed.

Proposed Section 4801.4 states that a Microgrid "owned or developed" by the EDC is not subject to the Chapter 48 rules being considered in this proceeding. Further, the proposed regulation provides that the EDC would have to obtain Commission approval if it seeks to "own or develop" a Microgrid. Given that Pepco is barred by statute from owning generation that is sold to retail customers,[17] the only way that Pepco can "own or develop" a Microgrid is as Pepco has proposed above as an alternative to the definition of Multiple Customer Microgrid. As such, proposed Section 4801.4 should be eliminated and the Commission should adopt Pepco's proposed modifications to the definition of Multiple Customer Microgrid.

ii. The Commission should amend proposed Section 4803.4.

Proposed Section 4803.4 states, in relevant part, that a Microgrid's protection and control system shall be required to meet all requirements set forth in proposed Section 4804 and operate under IEEE 1547-2018 standards and requirements. Indeed, IEEE 1547 is mentioned in several places throughout the NOPR. Pepco takes no issue with incorporating the NOPR IEEE 1547-2018 standard into the NOPR; however, the Commission should recognize that the cited standard has limited applicability and reference to when a Microgrid system is operated in an islanded mode. It does not fully address the situation in which a Microgrid is transitioning to and away from

[17] Under the statute, Pepco can own generation for other purposes, such as system reliability purposes.

islanding mode. As a result, the Commission will need additional standards that apply specifically to Microgrids and their controllers, such as IEEE 2030.7 through IEEE 2030.9.[18]

iii. Proposed Section 4803.1 is incomplete.

Proposed Section 4803.1 requires two clarifications or additions to make clear which assets may be owned or operated within a Microgrid and what generation types may be used by a Microgrid.

As proposed, Section 4803.1 states as follows:

> A Microgrid includes sufficient physical assets and distribution technologies that provide a suitable level of service that is safe and reliable, including automation technologies, sensors, power conditioning equipment, and other equipment suitable for voltage and/or frequency regulation, control systems, revenue-grade generation metering, and communication systems. Microgrids may include DERs such as CHP, solar, energy storage, and microturbines.

While the listing of "physical assets" is helpful, the regulation should also delineate assets other than just types of technology, such as wires or more typical distribution assets that may connect different areas within a Microgrid. This would especially be true in the case of a Multiple Customer Microgrid or, if adopted, Pepco's alternative to the proposed definition for Multiple Customer Microgrid.

In addition, the proposed Section 4803.1 lists generation sources, which include "DERs such as CHP, solar, energy storage, and microturbines." It is unclear, based on the generation types listed, whether this list is exhaustive or illustrative and whether or not a Microgrid could rely

[18] Please note that IEEE 2030.7 and 2030.8 are standards whereas 2030.9 is a recommended practice.

on generation more typical for customers that have back-up supply, such as diesel generators or other fuel sources that may not advance District climate objectives.

iv. Proposed Section 4804.1 is unclear and incomplete.

Proposed Section 4804.1 is unclear because it implies that all Microgrids must comply with certain codes and standards, including the Renewable Portfolio Standard (RPS).[19] However, under the NOPR as written, only Multiple Customer Microgrids–as an electric company–would be subject to the RPS. In addition, the proposed rule is incomplete because it only applies to certain District and national codes and standards—which are provided in more detail in proposed Section 4804.2—but does not mention Pepco's General Terms and Conditions, which may be applicable, or Pepco's interconnection agreement, including the agreement that the NOPR proposes to be developed for microgrids. For these reasons, Pepco recommends proposed Section 4804.1 be modified as follows:

> Microgrids shall comply with all applicable codes and standards the Commission identifies, <u>including but not limited to the EDC's General Terms and Conditions, applicable tariffs, and the applicable Interconnection Agreement(s). Codes and Standards may also include</u> the District of Columbia Renewable Portfolio Standard for Multiple Customer Microgrids. The Commission may, from time to time, review and, when necessary, modify and update the codes and standards that shall apply to Microgrids.

v. Section 4806.3(d, e) should include additional information.

Proposed Section 4806.3 lists different information that a Multiple-Customer Microgrid would have to provide to the Commission as part of the application process. Pepco recommends that part (d), "Location," also require the provision of the electrical layout or similar information. Pepco makes this recommendation because the physical location or street map may not always be

[19] Per 34 D.C. Code 1506 and 1513, an electric company may not provide retail supply service – as an electricity supplier – unless through an affiliate and must do so in a non-discriminatory fashion. For Multiple Customer Microgrids, this would mean that the Microgrid Owner and the generator, who would operate as an electricity supplier, would have to be separate entities.

sufficient to determine where the proposed Microgrid fits within Pepco's existing electric distribution configuration.

In addition, part (e), "the Number of Microgrid Customers," should also require additional information about the customers, including name and address. Pepco recommends this addition because this granular information would be helpful to the Commission in the event of a customer dispute or complaint.

vi. Section 4806.8 should explain how "non-discrimination" for providing utility services will work in practice.

Proposed Section 4806.8 addresses the Multiple-Customer Microgrid's obligation to provide services in a non-discriminatory manner, and Pepco takes no issue with the concept expressed in the draft rule. However, this proposed rule, which purports to apply to a Person "in the immediate vicinity of a Multiple Customer Microgrid," brings up other questions that require clarification.

For example, the phrase "immediate vicinity" is too vague and should be replaced with wording that can be observed and is objective. Pepco proposes removing "in the immediate vicinity" and replacing it with "directly physically or electrically adjacent to the Microgrid" so that it is clear that this provision applies to customers that are in physical proximity to the Microgrid.

Similarly, if the Person seeking to be served from the Microgrid is a current Pepco distribution customer, Pepco must be made whole for the existing Pepco infrastructure serving that customer and the infrastructure that will be needed for that customer receiving service from the Microgrid. To avoid other customers shouldering the burden of assets that are stranded or other investments/costs required due to the choice of an existing Pepco customer to join the Microgrid, Pepco recommends that the Commission expand this section of the NOPR to state that the cost of stranded infrastructure previously serving a customer and through what recovery mechanism

should be paid for by that customer unless it can be used by other Pepco customers at that time or in the future.

vii. Section 4899.1 definition of Energy Storage needs to align with the existing definition.[20]

The term "Energy Storage" is already defined in the regulations in Section 999.1. That existing definition, which previously went through the NOPR comment process as a result of PowerPath DC, differs from the definition in 4899.1.

> Energy storage – A resource capable of absorbing electric energy from the grid, from a behind-the-meter generator, or other DER, storing it for a period of time and thereafter dispatching the energy for use on-site or back to the grid, regardless of where the resource is located on the electric distribution system. These resources include all types of energy storage technologies, regardless of their size, storage medium (e.g., batteries, flywheels, electric vehicles, compressed air), or operational purpose.

The definition in 4899.1 should be modified to match the existing definition.

III. Conclusion

Pepco appreciates the opportunity to provide these initial comments on the NOPR and looks forward to continued engagement with the Commission and stakeholders on the development of microgrids within the District.

Respectfully submitted,
POTOMAC ELECTRIC POWER COMPANY

By: /s/ *Dennis P. Jamouneau*
Dennis P. Jamouneau
Assistant General Counsel

[20] Pepco has identified in its comments two instances in which the definitions in the NOPR do not match existing definitions. There may be other instances. The Commission should endeavor to ensure that all the definitions in the NOPR match existing definitions to avoid confusion and legal squabbles in the future.

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August 8, 2022

CERTIFICATE OF SERVICE

I hereby certify that a copy of Pepco's Initial Comments was served this August 8, 2022 on all parties in RM48-2022-01-E by electronic mail to:

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