

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL



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Public Advocacy Division
Housing and Environmental Justice Section

ELECTRONIC FILING

February 15, 2024

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

Re: Formal Case No. 1171 – In the Matter of the Investigation Into Community Renewable Energy Facility Practices in the District, Order No. 21952

Dear Ms. Westbrook-Sedgwick:

The District of Columbia Government (the District), through the Office of Attorney General, submits this letter in response to the Concurring Statement of Commissioner Beverly, requesting feedback regarding “the efficacy of the technical conferences that have been held to-date in Formal Case No. 1171.” The District provides the following feedback on the community renewable energy facility (CREF) practices technical conferences.

Feedback on Technical Conferences to Date

The biggest issue the District has had with the technical conferences is the unclear process for resolving technical questions when the parties are not in agreement. For instance, at the second technical conference on November 2, 2023, the Department of Energy and Environment (DOEE) raised the question of why a virtual CREF (VCREF) was required to purchase a Potomac Electric Power Company (Pepco) meter in order to operate. Pepco stated that the “VCREF system was designed to have two Pepco meters consistently communicating – the host meter, which is the Pepco meter connected to the Pepco systems, and a meter that is tracking generation and load which connects to the host meter. Pepco explained that to disaggregate the CREF’s generation data from the host’s load data, the two meters are required.”¹ While this response does illuminate why

¹ See page 3 here:

<https://edocket.dcpsec.org/apis/api/Filing/download?attachId=195811&guidFileName=1aa3ec54-58cd-4372-9cab-b3640932418a.pdf>

2 meters are required for a VCREF design, it does not resolve why the VCREF in question had to purchase Pepco's production meter specifically. It would be helpful if the Commission would make a determination on this issue to clarify why, unlike with all of the other CREFs, the VCREF had to purchase the Pepco production meter to do the disaggregation as Pepco indicated was necessary, regardless of whether it had already installed its own production meter.

Future of the Technical Conferences

Now that Pepco's meters have been removed from all existing CREFs, future technical conference meetings should be focused on two main areas:

1. Supporting the orderly and timely completion of the CREF billing audit
2. Supporting the orderly and timely implementation of a permanent automated billing solution for CREFs

These items should be standing topics for all future agendas. With regard to the billing audit, the District would appreciate it if more information is provided at the next meeting on the potential to use PJM GATS data to provide the information needed for the audit. The District believes that between Pepco and Commission staff there should be the necessary capacity and expertise to gather the necessary information from the GATS system on the required timeline. If for some reason this expectation is not correct, the District requests a detailed explanation of the bottlenecks preventing such data acquisition.

With regard to the installation of the permanent automated billing solution, the District requests that these regulator-lead technical conferences be used to address potential implementation issues and to organize beta testing and other implementation best practices in order to facilitate a smooth transition. There should be plenty of time to address potential errors before full implementation if the conferences are utilized effectively with the various CREF operators.

Respectfully submitted,

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Attorney General

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CERTIFICATE OF SERVICE

I hereby certify that on this 15th day of February 2024, I caused true and correct copies of the District's Response to the Concurring Statement of Commissioner Beverly, to be emailed to the following:

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