

**April 10, 2024. Sixth Formal Case No. 1171/GD-2022-01-E Technical Conference**

**Speakers:**

**Staff:** Public Service Commission of DC

**Pepco:** Potomac Electric Power Company

**DOEE:** Department of Energy and the Environment, DC Government.

**OAG:** Office of Attorney General, DC Government.

**1. Technical Conference commenced at 10:03 a.m.**

- a. **Staff:** Welcomed all to the Technical Conference and stated its purpose. Staff also announced that the draft minutes will be distributed the next day, April 11, and set forth the ground rules of the conference.

**2. CREF Billing Reconciliation Audit**

- a. **Staff:** stated that Pepco's CREF reconciliation is due May 8 and that the work on it is ongoing.
- b. **Staff:** requested and encouraged parties, especially complainants, as well as other stakeholders use their best efforts to contact the CREFs to send their historical metering data to Pepco, as Staff cannot provide any data to Pepco.
- c. **Staff:** noted that Watson Rice, the Auditor, is also reaching out to the CREFs, and asked Pepco for an update on their progress.
- d. **Pepco:** stated that it has historical data for 167 CREFs and has made numerous attempts to reach out to the CREFs in the following ways:
  - i. Started emailing CREFs in early February requesting data pursuant to Order No. 21600. In addition, weekly email requests have been sent out to CREFs beginning on March 15 from [CommunitySolar@pepco.com](mailto:CommunitySolar@pepco.com) seeking generation data that has not yet been received;
  - ii. Sending certified letters to CREF providers;
  - iii. Making several phone calls, hoping the CREFs reply and engage. Pepco plans to continue to reach out weekly;
- e. **Staff:** asked if there is a point person from Pepco that people can reach out to.
  - i. **Pepco:** stated that Luan Watson is the person to contact.
- f. **DOEE:** asked if Pepco has complete data for the 167 CREFs.
  - i. **Pepco:** responded that the data is complete.
- g. **DOEE:** asked how many CREFs have not provided data to Pepco.
  - i. **Pepco:** responded approximately 202.
- h. **DOEE:** referenced Pepco's emails and phone calls and reminded Pepco that ownership of solar projects often switches after completion. DOEE asked if Pepco is contacting the new owners.
  - i. **Pepco:** responded yes, to the best of their ability. The points of contact used for the reconciliation are the same that Pepco has been using for the permanent meter implementation solution.
- i. **DOEE:** asked if any CREFs raised any issues on providing their data to Pepco.

- i. **Pepco:** answered it has received emails from some CREFs that they would not be able to provide the data or thought it would be too burdensome.
  - ii. **DOEE:** asked if there has been a lot of non-responsiveness.
  - iii. **Pepco:** answered yes.
  - iv. **OPC:** asked for clarity on “too burdensome” and whether it applies in general or to the audit specifically. OPC also asked if the CREFs understand the difference between the two.
  - v. **Pepco:** clarified that those responses were directly in response to the Company asking the CREFs for their meter generation data pursuant to order 21600.
- j. **OAG:** asked Pepco if Pepco has a list of contacts that identify the CREFs it has not heard from or must still obtain the data from and stated that others require this info if they are to assist Pepco in obtaining data.
  - i. **Pepco:** answered that it did provide the Commission with a list of CREFs they were unable to contact. As of the date of the 6th Technical Conference, this list has not been shared with the public, but as CREFs are not customers, Pepco is willing to share the list with DOEE or OPC if the Commission approves it.
  - ii. **Staff:** stated they were unable to approve the release of the list of unresponsive CREFs to DOEE during the Conference. The Commission will discuss whether Pepco can release the list of unresponsive CREFs to DOEE after the conference and respond to Pepco and stakeholders accordingly, but any determination to release this information for the purpose of assisting Pepco in CREF outreach would need to be made by the Commissioners. The complaint filed had listings from Solar for All facilities and others. One may be able to find contacts there. The Commission staff has concerns about releasing information about CREFs.
- k. **Staff:** mentioned the issue regarding alternate data sources that DOEE had notified Staff that it wanted to discuss at the TC and asked DOEE to explain.
  - i. **DOEE:** proposed PJM/EIS GATS as one possible source, since if a CREF wants to get RECs, it must send production data to PJM, collected through GATS.
  - ii. **Staff:** stated that alternate data source has already been explored. Pepco previously asked the Commission if this was possible, and the Commission stated that it was unable to share GATS data due to its agreement with PJM/EIS GATS. The data is owned by the CREFs, and the Commission is prohibited from sharing it. The CREFs must first authorize the data sharing by either supplying the data directly to Pepco itself or enter into an agency agreement with Pepco, granting Pepco access to the GATS data. Otherwise, Pepco cannot access it for the billing reconciliation effort.
  - iii. **Staff:** in response to a question clarified that the auditor is not performing the reconciliation, Pepco is. The auditor is *auditing* the reconciliation.

- iv. **DOEE:** followed by asking if the CREFs must give Pepco physical access to look at the meter data for the reconciliation.
- v. **Staff:** affirmed this.
- vi. **DOEE:** asked for clarification on why Pepco would need special physical access if their role as a utility is to read the CREF meters.
- vii. **Staff:** responded because Pepco does not own the data; the CREFs do. But it suggested DOEE explore that question firsthand with PJM/EIS GATS.
- l. **Staff:** asked DOEE if they are proposing any other alternate data sources.
  - i. **DOEE:** responded that the other source would be SREC brokers.
- m. **Pepco:** asked the Staff for clarification on the auditing deadline.
  - i. **Staff:** replied that Order 21952, issued on February 8, stated that Pepco had 90 days from that date to submit its reconciliation. This would be May 8.
  - ii. **Pepco:** pointed out that the order stated the auditor was selected January 18.
  - iii. **Staff:** confirmed this but clarified that not everyone had notice of the date the auditor executed the contract, so the Commission issued an order making it clear the auditor was now on board and added additional days to the reconciliation deadline by extending it to 90 days after the order was issued instead of from the day the auditor was brought on.

### 3. Discussion of Pepco March 28, 2024, Bi-Weekly Report

- a. **Pepco:** displayed the latest bi-weekly filing, stated the next biweekly filing will be due Apr. 11, and it will not have any changes.
  - i. **Pepco:** stated that as of March 28, it was reading 146 eGauge meters directly, using August 2023 placeholder data for 199, and using system size estimates for 26. Attachments 1 and 2 of the reports have been static since removal was completed. Only attachment 3 changes, and only monthly.
- b. **Staff:** asked Pepco to comment on its efforts to verify the makes and models of meters that are currently unknown.
  - i. **Pepco:** stated it pulled the CREF applications and populated the report with appropriate data if the applications had them. They have also attempted to contact them by regular mail and email with no success.
  - ii. **Staff:** mentioned the possibility of site visits.
  - iii. **Pepco:** responded it can discuss that possibility internally, but it does not know where the CREF meter is on site or whether it is accessible. It may be outside Pepco's scope of work, and Pepco may not be able to discern meter make/model by just looking.

### 4. Pepco's Update on CREF Meter Reading Capability

- a. **Pepco:** reported that 166 meters are flowing data into Pepco's meter management system and are ready for billing and crediting in May. The next step is to integrate

the next group of meter manufacturers. Pepco confirmed that it is on track to complete the permanent solution by Q3 2024.

- b. **DOEE:** asked if the data management system is the “permanent solution” that was discussed.
  - i. **Pepco:** affirmed this. Its partner collects the data, normalizes it, and sends it to the data management system, and that data is then leveraged like any other for billing.
  - ii. **DOEE:** asked if the partner has essentially created the “head-end system” equivalent where the meter data comes in for processing.
  - iii. **Pepco:** also affirmed this is correct. This is the first step, but Q3 also includes a portal so that CREFs can see the data that has been imported from their systems.
- c. **Staff:** asked Pepco to describe the 166 meters.
- d. **Pepco:** explained that those are all eGauge meters. There are 176 total eGauge meters, with 166 of them currently integrated.
- e. **Staff:** pointed out that this is not consistent with their last report.
  - i. **Pepco:** clarified that is because that report reflected the previous billing cycle. It will be updated.
- f. **Staff:** asked if all meters will be integrated by Q3.
  - i. **Pepco:** responded that it will be up to CREFs to provide the metering credentials.
  - ii. **DOEE:** asked if Pepco has the number of CREFs who have yet to provide those credentials?
  - iii. **Pepco:** stated it will provide an update on that subject.

## 5. Next Steps

- a. The next Technical Conference is expected to be in May.
- b. **Staff:** reiterated and requested that everyone in the Technical Conference encourage the CREFs to provide their data to Pepco and further reiterated that May 8 is the date Pepco must submit their reconciliation.
- c. **DOEE:** stated they *have* reached out to CREFs, but there are no guarantees.
- d. **Staff:** re-emphasized that the reconciliation is only as good as the data that is provided.

**The 6<sup>th</sup> Technical Conference adjourned at approximately 10:48 a.m.**