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Sandra Mattavous-Frye, Esq.
People's Counsel

June 14, 2024

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

Re: Formal Case No. 1130, In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding, please find the *Office of the People's Counsel for the District of Columbia's Comments (PUBLIC).*

If there are any questions regarding this matter, please contact me at 202.727.3071.

Sincerely,

/s/ Ade Adeniyi

Ade Adeniyi
Assistant People's Counsel

Enclosure

cc: Parties of record

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BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

In the Matter of	§	
	§	
The Investigation into Modernizing the Energy Delivery System for Increased Sustainability	§ § § §	**Formal Case No. 1130**

COMMENTS OF THE OFFICE OF THE PEOPLE'S COUNSEL ADDRESSING THE SYNAPSE ENERGY ECONOMICS, INC. REPORT "A VALUE OF DISTRIBUTED ENERGY RESOURCES STUDY FOR THE DISTRICT OF COLUMBIA"

I. INTRODUCTION

Pursuant to the Public Notice issued by the Public Service Commission of the District of Columbia's ("PSC" or "Commission") on October 25, 2023,[1] the Office of the People's Counsel ("OPC" or "Office"), the statutory representative of District of Columbia ratepayers and consumers,[2] hereby submits comments on the study titled *A Value of Distributed Energy Resources Study for the District of Columbia* ("VDER Study") submitted by Synapse Energy Economics, Inc. ("SEE").[3]

II. BACKGROUND

By Order No. 17912, the Commission opened *Formal Case 1130,* pronouncing its intent to review the District's energy system in light of recent sustainability goals and mandates and to "identify technologies and policies that can modernize our energy delivery system."[4]

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[1] *Formal Case No. 1130, In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability ("Formal Case No. 1130"),* Public Notice rel. October 25, 2023.

[2] D.C. Code § 34-804 Lexis 2020.

[3] *Formal Case No. 1130, A Value of Distributed Energy Resources Study for the District of Columbia* ("VDER Study"), filed October 25, 2023.

[4] *Formal Case No. 1130,* Order No. 17912, ¶¶ 4-5, rel. June 12, 2015.

Synapse Energy Economics (SEE) developed for the Commission, a study titled *A Value of Distributed Energy Resources Study for the District of Columbia*. The purpose of the VDER Study is to inform the Commission and stakeholders of the potential value of DER to address costs in the electric system associated with generation, transmission, and distribution.

On October 25, 2023, the Commission issued a Public Notice inviting interested persons to comment on the *Value of Distributed Energy Resources Study* performed by SEE, filed on October 25, 2023, in *Formal Case No. 1130.* Herein, OPC provides a review of the study with a focus on load projections and physical assets.

III. SUMMARY OF OPC'S RECOMMENDATIONS

The VDER study helps to define the challenges of load growth resulting from building electrification and EV adoption. However, OPC submits improvements, including a focus on commercial, residential, and multi-family circuits must be made to the model used by the SEE study. By focusing on these types of circuits, load models can be matched to load types. Further, it is possible to then categorize Pepco's feeders to determine potential impacts to the system and plan valuable DERs accordingly in an Integrated Resource Plan. OPC recommends that the Commission consider and implement changes to the study and policies as discussed herein.

OPC focused its critique and recommendations of five areas – Feeder Selection, Building Electrification Loads, EV Loads, Load Flexibility and PV Resources. OPC's recommendations for each are summarized below and a more detailed analysis of each is in the discussion section.

Feeder Selection

The SEE study selected four feeder types (three radial feeders and one LVAC feeder) to examine a range of potential outcomes and possible interventions including high and low baseline peak loads, summer- and winter-peaking loads, and broad and narrow peaking load shapes. The four feeders selected to represent types of pressure on the distribution system are:

- Feeder 1 (F1): High Pressure (84 percent of normal rating), Summer Peak, Following Load.
- Feeder 2 (F2): Very High Pressure (91 percent of normal rating), Summer Peak, Needle Peak.
- Feeder 3 (F3): Very High Pressure (91 percent of normal rating), Winter Peak, Following Load.
- Feeder 4 (F4): Low Pressure (46 percent of normal rating), Summer Peak, Minimal Load Throughout.

Notably, more than 50% of the feeders on Pepco's system have peak demands at 46 percent of normal rating because the system is designed for a single contingency outage (N-1 that is loss of one system component).

In light of this discrepancy, OPC recommends the SEE study needs to re-focus on a planning criterion of N-1 and not a percent loading a peak. The remedy is to first identify the population of feeder loading. Further, the feeder selection should be based on (1) commercial feeder, (2) single-family residential feeder, and (3) multi-family feeder. In addition, the heat map analysis needs to consider the impacts of N-1 on the feeder capacity. Specifically, the study needs to determine a reasonable estimate of available capacity for probable contingency designs.

Building Electrification Loads

The SEE study evaluates building loads using a basis that is inconsistent with the loads in the District of Columbia. The Office recommends the study be reevaluated using the Department of Energy and Environment's Strategic Electrification Roadmap for Buildings and Transportation in the District of Columbia (Roadmap). The Roadmap sets tasks to reach the climate targets identified in the Clean Energy DC Plan.[5] OPC submits, using DOEE's Roadmap will allow the study to capture significant variations in any feeder that distributes energy to commercial buildings and incorporate the building typologies and energy use intensity.

EV Loads

The SEE study used a method to scale the magnitude of vehicle electrification to each feeder based on each feeder's relative contribution to citywide loads. As the impact of EV charging will vary from feeders serving commercial loads and primarily residential loads, OPC recommends the study select three sample feeders that serve the following load types -- (1) commercial loads, (2) single-family residential loads, and (3) multi-family building loads. This method will give a more accurate picture of how EV loads will impact the electric infrastructure in the District of Columbia.

Load Flexibility

As it concerns load flexibility, the SEE study placed a heavy focus on incentives for DER resources other than EV loads to achieve load flexibility. OPC finds this to be inadequate for the District of Columbia. Instead, OPC recommends that the SEE study should have highlighted incentivizing V2G capabilities. Doing so would allow Pepco to control or incentivize the discharge of energy at precise times from EV batteries to achieve load flexibility.

PV Resources

The SEE study held that Pepco's planning criteria dictate that a DER must be considered firm to be a dependable resource for peak planning purposes. As Pepco does not consider PV a dependable resource, this type of DER would not be utilized for planning purposes. However,

[5] District of Columbia Department of Energy and Environment Energy Administration. The strategic electrification roadmap for buildings and transportation in the District of Columbia. https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Strategic%20Electrification%20Roadmap-reducedsize.pdf (2023).

OPC submits when PV is paired with battery storage, it is a dependable resource for peak planning purposes. Therefore, OPC recommends the Commission adopt a policy that facilitates reasonable utility control of behind-the-meter storage systems such as PV and battery storage as a firm DER resource for peak planning to reduce energy demand.

IV. DISCUSSION

The purpose of the VDER Study is to consider strategies for determining the value of DER to avoid costs such as wholesale energy and capacity market costs, distribution upgrade costs, and the societal costs associated with greenhouse gas (GHG) emissions.[6] SEE modeled the increased loading from future building electrification of gas water heating, gas space heating, and EV loads on a select set of feeders. However, the feeders selected for the study are not representative of the feeder loading in the District.

SEE selected four feeder types (three radial feeders and one LVAC feeder) to examine a range of potential outcomes and possible interventions including high and low baseline peak loads, summer- and winter-peaking loads, and broad and narrow peaking load shapes. The four feeders selected to represent types of pressure on the distribution system are:

- Feeder 1 (F1): High Pressure (84 percent of normal rating), Summer Peak, Following Load.
- Feeder 2 (F2): Very High Pressure (91 percent of normal rating), Summer Peak, Needle Peak.
- Feeder 3 (F3): Very High Pressure (91 percent of normal rating), Winter Peak, Following Load.
- Feeder 4 (F4): Low Pressure (46 percent of normal rating), Summer Peak, Minimal Load Throughout.

[6] VDER Study, p. 7.

Of the 765 distribution system feeders in the District, Pepco provided data for 32 feeders. The chief selection criterion was that capacity on these feeders was approaching the feeders' normal rating.[7]

BEGIN CONFIDENTIAL [redacted] **END CONFIDENTIAL** This loading is to be expected because the distribution system is designed to allow one feeder to back feed an adjacent circuit when there is an outage.[9] Put simply, to accomplish the planning criteria, the feeders are loaded to 50% of capacity leaving 50% capacity for back feeding. Of course, the actual design process is more complex but this level of **BEGIN CONFIDENTIAL** [redacted] **END CONFIDENTIAL** of available feeder capacity is expected.

The 178 feeders reviewed by OPC matching the Feeder selection by SEE are shown in the following table. Note that most of the feeders are loaded less than 46%.

BEGIN CONFIDENTIAL

[redacted]

[7] VDER Study, p. 27.

[redacted]

[9] Formal Case 1176, Pepco Response to OPC Data Request 4-6.

[redacted]

[redacted]

[redacted]

END CONFIDENTIAL

When considering the results of the SEE evaluation, it is important to check the conclusion relative to the actual loading of feeders on the system.

The impacts of building electrification and additional EV load were developed by SEE and presented in heat maps. For the normal loading, the heat map represented a percentage of normal capacity.[10] The combined effects of building and vehicle electrification was depicted in a heat map in Figure 4 of the SEE report.[11] The impact to Feeder 4 (46% loading) which represents a majority of the feeders had a new maximum peak of 63%. This is an increase in loading (63% divided 46%) of 136%. One conclusion is that feeders with peak loading of 75% and less will not

[10] VDER Study, Figure 1, p. 29.
[11] VDER Study, Figure 4, P. 33.

exceed their normal capacity rating. The histogram in Figure 1 suggests that roughly 64% of feeders will not be overloaded due to building electrification and additional loads. Thus, the SEE Study conclusions are focused on a relatively small population of distribution feeders.[12] In addition, SEE also shows that Feeder 4 never reaches a point where the load exceeds the normal rating of the feeder.[13]

One possible conclusion could be that building, and EV electrification will impact only 32% of the distribution feeders. Thus, the value of localized DER would be limited to specific areas of the system. However, this also demonstrates a flaw in the SEE study. The SEE Study only considered the percent loading of normal capacity. The goal of Capacity Planning as stated in Pepco's design criteria is to expand and upgrade the distribution system in an orderly and economic manner such that:[14]

1. Adequate voltage can be maintained at the customer level, typically within +/- 5% of nominal voltage, as directed by state regulations.
2. Applicable ratings of facilities will not be exceeded under normal and more probable contingency conditions.
3. Reasonably reliable system and customer end-use service will be provided.
4. Adequate system reactive support is available.
5. As a general rule, a 13KV feeder can supply on average up to 8.5 MVA.

Item 3 on the list of criteria, the requirement for rating of facilities to not be exceeded for probable contingency conditions, is an important concept for urban electric distribution systems

[12] Metro Traction power is excluded, feeders load less than 75% are potentially excluded, and LVAC feeders should never exceed their normal capacity due to the design of the low voltage network.
[13] VDER Study, Table 3, P. 37.
[14] Formal Case 1176, Pepco Response to OPC Data Request 4-6.

and is often referred to as an N-1 planning criterion. This criterion for distribution feeders will yield a higher level of reliability and resiliency. This is especially important for underground feeders which require many hours to repair if the cable fails. With an N-1 criterion, an adjacent feeder can be used to serve the load while the isolated section of failed cable is repaired.

OPC's Recommendations for Feeder Selection

The SEE Study helps to consider the localized costs, but the Study is based only on normal loading and is focused on feeders with high initial loading. This results in an appearance of exaggerated impacts since most feeders in the Pepco system have lower initial loading than the selected feeders analyzed by SEE. Thus, the conclusion of the study that aggressive electrification of buildings and transportation could increase the risk of costly distribution system upgrades,[15] is overstated.

The remedy is to first identify the population of feeder loading. Further, the feeder selection should be based on (1) commercial feeder, (2) single-family residential feeder, and (3) multi-family feeder. In addition, the heat map analysis needs to consider the impacts of N-1 on the feeder capacity. Specifically, the study needs to determine a reasonable estimate of available capacity for probable contingency designs.

Building Electrification Loads

The SEE Study models the impact of growing pressure from building electrification on the selected distribution feeders. The Study devised an 'aggregated energy efficiency retrofit package' containing multiple measures, but only imported residential savings scenarios available from National Renewable Energy Lab studies on End Use Load Profiles and End Use Savings Scenarios, as the commercial data was unavailable at the time. A substantial number of researched and

[15] VDER Study, P. 7.

published case studies posit the increase in electricity consumption following electrification retrofits differs among commercial, multifamily, and residential buildings, and this generalization of load profiles is not suitable for planning.

The building electrification scenarios amongst the different sectors can also have a wide-ranging impact and should not be grouped as much as possible. For example, the U.S. Department of Energy recently showcased the conversion of aging natural gas boilers and a natural gas-fired packaged Rooftop Unit (RTU) with a Variable Refrigerant Flow (VRF) system installed for both space heating and cooling of a commercial building.[16] The retrofit of the building, and its office spaces, resulted in a 15% increase in electricity consumption. In comparison, California Climate Investments published case studies of eight (8) low-income, multifamily electrification projects. Here, smart electrification technologies generated an average increase of electricity at 21%, but as high as 84%.[17] This supports the need to incorporate scenario characteristics when modeling the three unique feeders that distribute electricity to commercial, multifamily, or residential buildings to capture the variation in load profiles that result from whole-building electrification.

OPC's Recommendations for Building Electrification Loads

The Department of Energy and Environment's Strategic Electrification Roadmap for Buildings and Transportation in the District of Columbia (Roadmap) sets tasks to reach the climate targets identified in the Clean Energy DC Plan.[18] To align with the Roadmap, the Office

[16] U.S. DOE., Guidance document on space heating electrification for large commercial buildings with boilers. April 2024.
[17] California Climate Investments, Low-income weatherization program for multifamily properties electrification case study, (2020).
[18] District of Columbia Department of Energy and Environment Energy Administration. The strategic electrification roadmap for buildings and transportation in the District of Columbia. https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Strategic%20Electrification%20Roadmap-reducedsize.pdf (2023).

recommends that the study be expanded to capture significant variations in any feeder that distributes energy to commercial buildings and incorporate the building typologies and energy use intensity (EUI) used in the model's baseline. To acknowledge the potential impact of the DC Clean Energy Building Code Amendment of 2022, the Office suggests devising multiple sensitivity scenarios, specific to commercial and multi-family buildings, that account for different energy efficiency adoption measures and uptake rates alongside electric building systems. This approach will provide useful information because while the 2022 legislation aims to promote the electrification of buildings, the speed of adoption is evolving.

EV Loads

Another one of OPC's concern is the method used to spread EV loads and how those loads are modeled. The SEE Study scaled the magnitude of vehicle electrification to each feeder based on each feeder's relative contribution to citywide loads, considered both in terms of MWh and MW.[19]

Pepco's distribution system serves approximately 337,000 customers (310,000 residential customers and 27,000 commercial customers) in the District. Approximately 75 percent of the total energy in the District is consumed by commercial customers.[20]

However, the adoption of EV is affected by the availability of home charging, workplace charging, and public charging. In residential areas with single-family dwellings, EV adoption is generally thought to be higher when compared to apartments or condominiums where charging facilities may be limited and out of the control of those living in these multi-family dwellings. Many low and moderate-income households reside in multi-family buildings. For these households, the ability to purchase and utilize EVs may be limited. Thus, the impact of EV

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[19] VDER Study, P. 181.
[20] VDER Study, P. 27.

charging will vary from feeders serving commercial loads and primarily residential loads. One possible solution is for a study to select three sample feeders that serve predominantly (1) commercial loads, (2) single-family residential loads, and (3) multi-family building loads.

OPC's Recommendations for EV Loads

In terms of feeder loading, load shapes are different for shared EV chargers in multi-family dwellings compared to single-family residential dwellings. A notable difference also exists between loading as EV adoption rates increase and appear unevenly across distribution feeders. One option is to devise additional EV charging load scenarios that account for different dwelling categories and deep EV adoption that will maximize the use of EV chargers throughout a 24-hour period. Specifically, the scenarios should include large multi-family dwellings, as the steepest increases are likely to occur in a charging scenario when the peak total demand and peak charging demand align.[21]

DC fast chargers can be a focused high demand load. Electrify America and Tesla fast chargers often have a total capacity exceeding 1 MW which is significant on a feeder that has a normal rating of 8.5 MW. The SEE study does not adequately address the impacts of aggressive EV charging demand on these loads. OPC is aware of utilities coupling these DC fast chargers with battery systems to relieve peak loading. This is accomplished by localized batteries which can be used to supply energy to DC Fast Chargers and thereby reduce the peak demand on the feeder. This is an example of localized value for distributed energy resources. Further, it is possible to have a rate demand charge for fast chargers that can help to incentivize a reduction in the maximum kW charging during peak periods. Of course, a concern within the District is the need to provide high-demand fast charging for the many visitors and commuting workers from

[21] Powell, S., Cezar, G.V., Min, L., Azevdo, I.M., and Rajagopal, R. (2022). Charging infrastructure access and operation to reduce the grid impacts of deep electric vehicle adoption. Nature Energy (7).

Maryland and Virginia without adversely affecting the rate impacts to permanent residents. The technology needed will require monitoring feeder demands and energy consumption, as well as real-time control of charging demand at DC Fast Chargers.

SEE used the EVI-PRO tool to model two scenarios with explanatory power:[22]

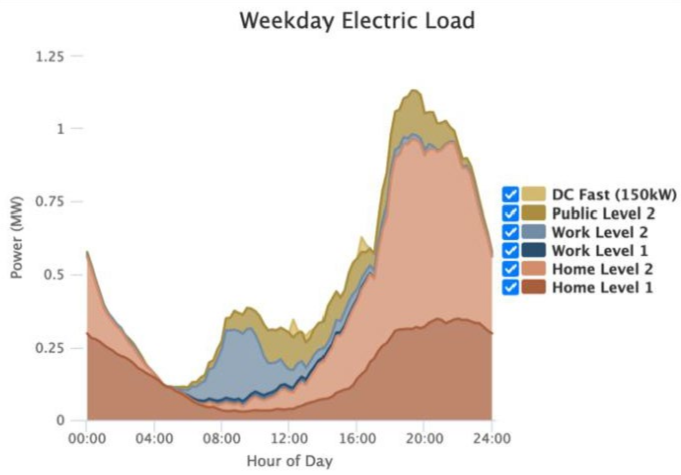
Scenario 1 - Charge primarily at home, immediately, as fast as possible.

Scenario 4 - Balanced charging designed to flattening [sic] EV loads.

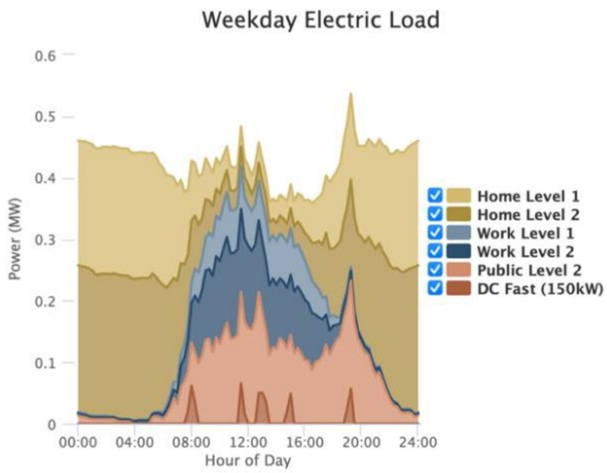
Scenario 1 represents loads without market intervention and Scenario 4 is used to simulate EV charging load shaping which occurs when spreading the load across 24 hours to reduce peak usage. The EVI-PRO tool is based on a minimum population of 1,000 electric vehicles and excels at modeling system and substation loading. However, at the feeder level, the number of EVs is reduced and the translation from a diversity of 1,000 EVs to a small set of EVs is unclear. For example, a single Level 2 (204 volt) charger in a home has a peak demand of 19.6 kW and a DC Fast Charger has a peak demand of 150 kW or more. Referencing EV Scenario 1[23] with 1,000 EVs, the average demand is 1.25kW when there is no control of the vehicle charging. Referencing EV Scenario 4[24] with 1,000 EVs the average demand per vehicle is 0.5 kW. If the population of EVs on a feeder was 500 vehicles, the loading per vehicle could be understated. Blending the EV load shapes for the different sectors does not coordinate with the recommendation to analyze each feeder separately so it is recommended that the load shapes for commercial, multifamily, residential, and public charging be unique and treated separately in their impacts to the feeder analyses.

[22] VDER Study, P. 179.
[23] VDER Study, P. 180 .
[24] VDER Study, P. 180 .

EV Scenario 1



EV Scenario 4



Realistically, on a feeder, the loads will be concentrated which can have negative impacts on sections of the feeders. That is, EVs could be clustered on one portion of the feeder causing localized overloads on a portion of the feeder. In general, capacity increases for these clusters are less costly than upgrading an entire feeder. The Office is not proposing an alternate modeling but suggests that the use of SEE's conclusions be tempered by the limitations of the model data.

The load shaping of EVs is complex with various owners of the chargers including homeowners, owners of multi-family buildings with shared chargers, and other owners of DC fast chargers. The load shaping is further complicated by the wide range of electric vehicle models.

The need to control charging is clear but the path to achieving it will be complicated and the load shaping used in SEE's study is rather optimistic. It is more likely that there will be peaks in the EV loading even with load shaping (Time of Use rates and demand management of vehicle charging). OPC recommends that the Commission adopt policies that require aggressive load shaping through reasonable control of car charging apparatus as EV adoption increases.

Load Flexibility

SEE discussed that grid relief could be obtained utilizing load flexibility.[25] The use of demand-side management (DSM) allows the utility to control the air conditioning, electric water heater, and electric heat. These systems are mature in that Pepco has been using DSM for many years to control system peaks. This is a classic example of load flexibility in that the use of the load is delayed until after a system peaking event. Smart building technologies for commercial buildings further allow greater control of load behind the meter. These systems often respond to price signals from the utility to reduce electrical demand which for example, can include turning off escalators, turning off certain lighting systems, and modification of thermostats.. The modern technology is solar and battery systems located behind the meter. In some jurisdictions, the utility will control the charging and discharging of the battery storage. This allows system peak reduction similar to DSM. Generally, distributed solar resources are not considered DER that can be used similar to flexible load. However, the SEE Study does not mention electric vehicle to grid (V2G) technology even though the Study extends to 2045. V2G technology can be used to help with load shaping and load flexibility similar to battery storage.

The Maryland General Assembly passed HB 1256, aka the Distributed Renewable Integration and Vehicle Electrification ("DRIVE") Act, on April 2, 2024. This act requires utilities

[25] VDER Study, P. 39.

to allow electric vehicles ("EVs") with bidirectional chargers to connect to the distribution grid. California already allows V2G interconnection with utility permission and PG&E has launched pilot programs for V2G.

OPC's Recommendations for Load Flexibility

OPC submits, the battery resources similar to the ones recently adopted in Maryland should be included in an updated VDER Study as a separate and valuable resource that can be controlled by the utility and potentially used and valued by localization. With a high saturation of EVs equipped with V2G, problems with feeder capacity can be solved by leveraging the storage of energy in the EVs. Specifically, electric utilities could control or incentivize the discharge of energy at precise times from EV batteries. This control of a grid resource is what SEE suggested was needed. Rather than focusing only on incentives for other DER resources, the study should have highlighted incentivizing V2G capabilities similar to the initiatives in Maryland.

PV Resources

SEE noted that Pepco's planning criteria dictate that a DER must be considered firm to be a dependable resource for peak planning purposes.[26] Pepco asserts that solar is not considered a firm DER resource.[27] Because Pepco does not view PV as a firm resource for planning purposes, it is not possible to place any value on PV for delaying distribution or substation capacity upgrades. Using PV for resource adequacy requires an adequate reserve margin and confidence that the PV resources will be utilized for demand reduction. If PV does not fulfill this resource adequacy for capacity planning, the value of PV will be limited to energy impacts and specific greenhouse gas emissions improvements.

[26] VDER Study, Footnote 23, p. 63.
[27] VDER Study, Footnote 24, p, 63.

When a behind-the-meter resource has PV and storage, and the storage can be controlled by the utility, then the battery is a firm resource. Specifically, the storage capacity becomes dispatchable by the utility, often used to reduce the energy demand and use of the customer. This eliminates the need for energy and electric demand to be delivered through a feeder.

OPC's Recommendations for PV Resources

The Office urges the Commission to adopt a policy that facilitates reasonable utility communication and control as well as customer incentives to allow reasonable utility control of behind-the-meter storage systems as a firm DER resource. The Office recommends that the Commission's policy should preserve customers' rights to opt out of such incentives and control.

Roadmap

SEE prepared a roadmap that includes technical difficulties; specifically, the need for DER to be dispatched in an intelligent and coordinated manner. While not specifically mentioned, EV loads must also be controlled and coordinated along with the other DER resources. SEE's Recommendation #4 calls for the development of VDER tariffs for technologies that can export electricity to the grid.[28] OPC submits Recommendation #4 should be expanded to include V2G resources.

[28] VDER Study, p. 76.

V. <u>CONCLUSION</u>

WHEREFORE, the Office respectfully requests the Commission carefully consider and adopt the recommendations and policies discussed herein.

Respectfully submitted,
<u>/s/ Sandra Mattavous-Frye</u>
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Dated: June 14, 2024

CERTIFICATE OF SERVICE

Formal Case No. 1130, In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability

I certify that on June 14, 2024, a copy of the *Office of the People's Counsel's Comments (PUBLIC),* was served to the following parties of record by hand delivery, first class mail, postage prepaid, or electronic mail:

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