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July 1, 2024

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: PEPPOR-2024-01**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's ("Pepco" or the "Company")  
Motion for Leave to Reply and Limited Reply Comments.

Sincerely,

*/s/ Dennis P. Jamouneau*  
Dennis P. Jamouneau

Enclosures

cc: All Parties of Record

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

|                               |   |                       |
|-------------------------------|---|-----------------------|
| <b>IN THE MATTER OF</b>       | ) |                       |
|                               | ) |                       |
| <b>POTOMAC ELECTRIC POWER</b> | ) | <b>PEPPOR-2024-01</b> |
| <b>COMPANY’S PURCHASE OF</b>  | ) |                       |
| <b>RECEIVABLES</b>            | ) |                       |

**MOTION OF POTOMAC ELECTRIC POWER COMPANY  
FOR LEAVE TO REPLY AND LIMITED REPLY COMMENTS**

Pursuant to Rule 105.8 of the Rules of Practice and Procedure of the Public Service Commission of the District of Columbia (“Commission”),<sup>1</sup> Potomac Electric Power Company (“Pepco” or the “Company”) hereby respectfully moves to file reply comments to the comments submitted on June 17, 2024 by NRG Energy, Inc. and Constellation NewEnergy, Inc. (“Suppliers”) in response to Pepco’s April 30, 2024 annual update to the Company’s Purchase of Receivables (“POR”) tariff. The Commission issued a Notice of Proposed Tariff (“Notice”) on May 17, 2024 allowing for comments. However, the Notice did not explicitly permit reply comments. Accordingly, Pepco respectfully moves for leave to file reply comments to the Supplier comments and Pepco includes its reply comments herein.

**I. MOTION FOR LEAVE TO REPLY**

Pursuant to Rule 105.8 of the Commission’s rules of practice and procedure, Pepco respectfully asks for leave to reply to the June 17, 2024 comments by the Suppliers in this proceeding. Leave is necessary in this case because the Commission’s May 17, 2024 Notice, which allowed for comment on Pepco’s April 30, 2024 filing, did not explicitly provide for reply

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<sup>1</sup> 15 DCMR § 105.8.

comments. However, reply comments in this instance will provide the Commission with a more fulsome record and proposes an alternative similar to the one presented by the Suppliers, and should aid the Commission in its decision-making in this proceeding.

Accordingly, Pepco respectfully requests that the Commission accept the Company's limited reply comments.

## II. LIMITED REPLY COMMENTS

As explained in the introduction, Pepco filed its updated POR filing on April 30, 2024. As explained in its filing, Pepco's filing and proposed Discount Rate calculation follow past practice and Commission orders and are calculated based on observed POR activity from January 2023 through December 2023. Suppliers' comments focus on the result – the difficulty that the proposed Discount Rate poses to the competitive market – but do not directly criticize the methodology. Suppliers then propose that the Commission consider alternatives and point to Pepco's affiliate, Delmarva Power & Light ("DPL"), which has amortized POR-related costs in an effort to lower POR rates.<sup>2</sup>

Pepco is sensitive to the effects of this rate on the competitive market and can propose an alternative similar to the one used by DPL. Pepco did not propose such an alternative in its April 30, 2024 update filing because, and in contrast to DPL, Pepco did not have the type of historic undercollection issues that had been experienced by DPL in Maryland and Delaware. That said, in an effort to find a middle ground and aid judicial economy, Pepco proposes for Commission consideration a method similar to that used by DPL, which would result in a Discount Rate of 5.42% rather than the 14.87% proposed originally, which was based on the methodology

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<sup>2</sup> Supplier Comments at 2.

previously used by Pepco and approved by the Commission. Based on this methodological change, the Residential Uncollectible Expense Component rate is derived by dividing the total Electric Supplier uncollectible expense over the life of the POR program by the total Electric Revenues Billed over the life of the POR program. Additionally, 2023 uncollectible amounts are amortized over a two-year period (2024 and 2025 filings). However, Pepco notes that based on the available 2024 write-off data, the amounts are trending consistently with 2023 and if this continues through the end of 2024, this change might be more challenging to address next year and in future filings.

However, Pepco would note that changing the methodology may also require a waiver of the language in its currently-approved tariff, Section 1(a). Pepco would propose changes, which are in bold and underlined:

Schedule 3: District of Columbia - Discount Rate for Purchase of Receivables (POR)

- 1) The initial (unadjusted) Discount Rate for Residential Service Customers served under Schedules R (including Rider RAD) and MMA, Non-Residential Small Commercial customers served under Schedules GS ND, T, SL, OL LED, TS and TN, Large Commercial customer served under Schedules GS-LV, GS 3A, MGT LV, GT LV, MGT LV, GT 3A, GT 3B and RT customers served under Schedules GS-ND, GS-LV, GS 3A, MGT LV, GT-LV, MGT LV, GT 3A, T, SL, OL LED, TN, and TS of the Retail Electric Service Tariff is calculated as follows:

- a) The Uncollectible Expense Component percent is calculated by dividing the Electric Supplier uncollectible expenses associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule. **For Schedules R (including Rider RAD) and MMA, the Uncollectible Expense Component is calculated by dividing the Electric Supplier program to date uncollectible expenses associated with each rate schedule by the program to date electricity revenues billed for all Electricity Suppliers for that rate schedule.**

This minor change to the tariff, if the Commission agrees such change is warranted, would allow the Commission and the Company additional flexibility for this year and the future in similar situations.

**B. CONCLUSION**

Pepco respectfully requests that the Commission grant this motion and consider the reply comments included herein.

Respectfully submitted,  
**POTOMAC ELECTRIC POWER COMPANY**

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July 1, 2024

# **ATTACHMENT A**

PEPCO CLEAN VERSION

**ELECTRICITY SUPPLIER**

**COORDINATION TARIFF**

**IN THE**

**DISTRICT OF COLUMBIA**



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**Schedule 3: District of Columbia - Discount Rate for Purchase of Receivables (POR)**

- 1) The initial (unadjusted) Discount Rate for Residential Service Customers served under Schedules R (including Rider RAD) and MMA, Non-Residential Small Commercial customers served under Schedules GS ND, T, SL, OL LED, TS and TN, Large Commercial customer served under Schedules GS-LV, GS 3A, MGT LV, GT LV, MGT LV, GT 3A, GT 3B and RT customers served under Schedules GS-ND, GS-LV, GS 3A, MGT LV, GT-LV, MGT LV, GT 3A, T, SL, OL LED, TN, and TS of the Retail Electric Service Tariff is calculated as follows:
  - a) The Uncollectible Expense Component percent is calculated by dividing the Electric Supplier uncollectible expenses associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule. For Schedules R (including Rider RAD) and MMA, the Uncollectible Expense Component is calculated by dividing the Electric Supplier program to date uncollectible expenses associated with each rate schedule by the program to date electricity revenues billed for all Electricity Suppliers for that rate schedule.
  - b) The Late Payment Revenue percent is calculated by dividing the Electric Supplier Late Payment Revenue associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule.
  - c) The Program Development and Operation Cost is amortized over three years and earns interest at the Company's most recent authorized distribution system rate of return. The annual amortization cost by type is divided by the most recently available number of choice accounts to derive at an annual cost per customer. The average annual customer usage kWh by type are multiplied by the supply rate for that type to calculate the annual supply revenue per customer. The Program Development and Operation Cost Component percent is derived by dividing the annual cost per customer by the annual supply revenue per customer.
  - d) The Risk and Cash Working Capital ("CWC") Component is set to zero at this time.
  - e) The initial Discount Rate is derived by adding the Uncollectible Expense Component net of Reinstatements (a); the Program Development and Operation Cost Component (c); the Risk and CWC Component (d); and subtracting the Late Payment Revenue Component (b).
- 2) The Reconciliation Component is calculated on the Imbalance separately for residential and non-residential customers. Imbalances are recorded in a balancing asset or liability segment and represent the differences between cumulative costs eligible for recovery and discount amounts for purchased receivables. During its disposition, an Imbalance earns interest at the Company's most recent authorized distribution system rate of return. Such rate is adjusted for taxes, when the Imbalance represents an under-collection of costs to the Company. The Reconciliation Component rate is calculated by dividing the Imbalance separately for residential and non-residential customers by the electricity revenues billed for all Electricity Suppliers for those rate schedules. There will be no rebate/refund

mechanism.

- 3) A separate Interest Factor is derived by dividing any interest earned or owed separately for residential and non-residential customers by the estimated electricity revenues billed for all Electricity Suppliers for those rate schedules.
- 4) If there are unrecovered costs associated with the purchase of eligible Electricity Supplier receivables and an insufficient number of Electricity Suppliers are using Company consolidated billing to support the recovery of those costs, the Company is permitted to impose a charge on Electricity Suppliers to recover such costs.
- 5) The Discount Rate (after the first year of service) is derived by updating the initial rate calculated above and adding the Reconciliation and Interest components. There will be a total of four separate calculated discount rates: Residential (including Schedules R and MMA and Rider RAD), Small Commercial, and Large Commercial.
- 6) Pepco tracks negative discount rates and amounts by customer class for use in offsetting positive discount rates in the future for the applicable customer classes.
- 7) Effective August 1, 2024, the Discount Rates are as follows:

| <u>Rate Schedule</u>   | <u>Discount Rate</u> |
|--|----------------------|
| Residential – Schedules R and MMA including Rider RAD                    | 5.4197%              |
| Small Comm. – Schedules GS ND, T, SL, OL LED, TS and TN                  | 0.0000%              |
| Large Comm. – Schedules GS-LV, GS 3A, GT LV, MGT LV, GT 3A, GT 3B and RT | 0.0000%              |

PEPCO REDLINE VERSION

**DC**

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**ELECTRICITY SUPPLIER**

**COORDINATION TARIFF**

**IN THE**

**DISTRICT OF COLUMBIA**



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**Schedule 3: District of Columbia - Discount Rate for Purchase of Receivables (POR)**

- 1) The initial (unadjusted) Discount Rate for Residential Service Customers served under Schedules R (including Rider RAD) and MMA, Non-Residential Small Commercial customers served under Schedules GS ND, T, SL, OL LED, TS and TN, Large Commercial customer served under Schedules GS-LV, GS 3A, MGT LV, GT LV, MGT LV, GT 3A, GT 3B and RT customers served under Schedules GS-ND, GS-LV, GS 3A, MGT LV, GT-LV, MGT LV, GT 3A, T, SL, OL LED, TN, and TS of the Retail Electric Service Tariff is calculated as follows:
  - a) The Uncollectible Expense Component percent is calculated by dividing the Electric Supplier uncollectible expenses associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule. For Schedules R (including Rider RAD) and MMA, the Uncollectible Expense Component is calculated by dividing the Electric Supplier program to date uncollectible expenses associated with each rate schedule by the program to date electricity revenues billed for all Electricity Suppliers for that rate schedule.  
~~The Uncollectible Expense Component percent is calculated by dividing the Electric Supplier uncollectible expenses associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule.~~
  - b) The Late Payment Revenue percent is calculated by dividing the Electric Supplier Late Payment Revenue associated with each rate schedule by the electricity revenues billed for all Electricity Suppliers for that rate schedule.
  - c) The Program Development and Operation Cost is amortized over three years and earns interest at the Company's most recent authorized distribution system rate of return. The annual amortization cost by type is divided by the most recently available number of choice accounts to derive at an annual cost per customer. The average annual customer usage kWh by type are multiplied by the supply rate for that type to calculate the annual supply revenue per customer. The Program Development and Operation Cost Component percent is derived by dividing the annual cost per customer by the annual supply revenue per customer.
  - d) The Risk and Cash Working Capital ("CWC") Component is set to zero at this time.
  - e) The initial Discount Rate is derived by adding the Uncollectible Expense Component net of Reinstatements (a); the Program Development and Operation Cost Component (c); the Risk and CWC Component (d); and subtracting the Late Payment Revenue Component (b).
- 2) The Reconciliation Component is calculated on the Imbalance separately for residential and non-residential customers. Imbalances are recorded in a balancing asset or liability segment and represent the differences between cumulative costs eligible for recovery and discount amounts for purchased receivables. During its disposition, an Imbalance earns interest at the Company's most recent authorized distribution system rate of return. Such

rate is adjusted for taxes, when the Imbalance represents an under-collection of costs to the Company. The Reconciliation Component rate is calculated by dividing the Imbalance separately for residential and non-residential customers by the electricity revenues billed for all Electricity Suppliers for those rate schedules. There will be no rebate/refund mechanism.

- 3) A separate Interest Factor is derived by dividing any interest earned or owed separately for residential and non-residential customers by the estimated electricity revenues billed for all Electricity Suppliers for those rate schedules.
- 4) If there are unrecovered costs associated with the purchase of eligible Electricity Supplier receivables and an insufficient number of Electricity Suppliers are using Company consolidated billing to support the recovery of those costs, the Company is permitted to impose a charge on Electricity Suppliers to recover such costs.
- 5) The Discount Rate (after the first year of service) is derived by updating the initial rate calculated above and adding the Reconciliation and Interest components. There will be a total of four separate calculated discount rates: Residential (including Schedules R and MMA and Rider RAD), Small Commercial, and Large Commercial.
- 6) Pepco tracks negative discount rates and amounts by customer class for use in offsetting positive discount rates in the future for the applicable customer classes.
- 7) Effective August 1, ~~2023~~2024, the Discount Rates are as follows:

| <u>Rate Schedule</u>   | <u>Discount Rate</u>              |
|--|-----------------------------------|
| Residential – Schedules R and MMA including Rider RAD                    | <del>3.9807%</del> <u>5.4197%</u> |
| Small Comm. – Schedules GS ND, T, SL, OL LED, TS and TN                  | <del>0.7765%</del> <u>0.0000%</u> |
| Large Comm. – Schedules GS-LV, GS 3A, GT LV, MGT LV, GT 3A, GT 3B and RT | 0.0000%                           |

# **ATTACHMENT B**

Potomac Electric Power Company  
 District of Columbia  
 Purchase of Receivables  
 Supplier Discount Rates  
 January 1 through December 31, 2023

|  | RESIDENTIAL<br>Schedules R & MMA | SMALL COMMERCIAL<br>Schedules GS-LV-ND,<br>T, SL, TS, TN & OL-LED | LARGE COMMERCIAL<br>Schedules GS-LV, GS-<br>3A, MGT-LV, GT-LV,<br>GT-3A, GT-3B & RT |
|--|----------------------------------|---|---|
| Write-Offs   | <b>1</b> 1.6430%                 | 0.7208%   | 0.0416%   |
| Late Payment Revenues  | 0.7360%                          | 0.7383%   | 0.7284%   |
| Net Write-Offs (Write-Offs plus Reinstatements, minus Late Payment Revenues) | 0.9070%                          | -0.0175%  | -0.6868%  |
| Interest Factor  | 0.2041%                          | -0.0073%  | -0.0258%  |
| Reconciliation Factor  | 4.3086%                          | -1.3028%  | -2.1184%  |
| Discount   | 5.4197%                          | -1.3276%  | -2.8310%  |
| <b>Discount (zeroed)</b>   | <b>5.4197%</b>                   | <b>0.0000%</b>  | <b>0.0000%</b>  |
| Payment Factor   | 94.5803%                         | 100.0000%   | 100.0000%   |

| October 2013 - December 2023 |                 |                          |  |
|------------------------------|-----------------|--------------------------|--|
| Customer Type                | Write-Offs      | Electric Revenues Billed | Write-Offs as a Percentage of Revenues |
| Residential                  | \$ 8,738,386.19 | \$ 531,862,902.31        | 1.6430%                                |

The Residential Write-Off rate is derived by dividing the total write-offs over the life of the POR **1** program, by the total Electric Revenues Billed over the life of the POR program:

# **ATTACHMENT C**

Potomac Electric Power Company - DISTRICT of COLUMBIA

Purchase of Receivable Data

January through December 2023

|   | Jan-23                  | Feb-23                  | Mar-23                  | Apr-23                  | May-23                  | Jun-23                  | Jul-23                  | Aug-23                  | Sep-23                  | Oct-23                  | Nov-23                  | Dec-23                  | TOTAL                    |
|---|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|-------------------------|--------------------------|
| <b>Electric Revenues Billed</b>   |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                          |
| Residential - R & MMA   | \$ 5,393,276.82         | \$ 4,223,421.23         | \$ 4,715,873.43         | \$ 3,438,319.44         | \$ 3,588,371.84         | \$ 4,093,841.83         | \$ 5,288,188.68         | \$ 6,326,990.31         | \$ 5,006,313.24         | \$ 3,886,819.26         | \$ 3,069,608.49         | \$ 3,776,115.93         | \$ 52,807,140.50         |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 1,717,769.09            | 1,593,509.85            | 1,441,634.58            | 1,377,351.02            | 1,381,874.60            | 1,290,688.21            | 1,284,592.93            | 1,367,881.96            | 1,373,962.24            | 564,883.24              | 1,212,630.91            | 1,317,361.54            | 15,924,140.17            |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 25,202,601.41           | 22,857,466.27           | 24,152,555.89           | 22,989,801.55           | 25,024,599.35           | 28,733,033.98           | 29,443,948.29           | 34,325,870.02           | 29,666,998.05           | 29,118,022.60           | 26,718,597.29           | 25,174,034.88           | 323,407,529.58           |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                        |
| <b>Total</b>  | <b>\$ 32,313,647.32</b> | <b>\$ 28,674,397.35</b> | <b>\$ 30,310,063.90</b> | <b>\$ 27,805,472.01</b> | <b>\$ 29,994,845.79</b> | <b>\$ 34,117,564.02</b> | <b>\$ 36,016,729.90</b> | <b>\$ 42,020,742.29</b> | <b>\$ 36,047,273.53</b> | <b>\$ 33,569,725.10</b> | <b>\$ 31,000,836.69</b> | <b>\$ 30,267,512.35</b> | <b>\$ 392,138,810.25</b> |
| <b>POR Discount</b>   |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                          |
| Residential - R & MMA   | \$ -                    | \$ -                    | \$ -                    | \$ -                    | \$ -                    | \$ -                    | \$ -                    | \$ (252,142.83)         | \$ (200,006.52)         | \$ (157,109.18)         | \$ (122,772.67)         | \$ (149,568.91)         | \$ (881,600.11)          |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | -                       | -                       | -                       | -                       | -                       | -                       | -                       | (10,662.57)             | (10,694.59)             | (13,772.17)             | (9,529.09)              | (10,393.23)             | (55,051.65)              |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                        |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                        |
| <b>Total</b>  | <b>\$ -</b>             | <b>\$ (262,805.40)</b>  | <b>\$ (210,701.11)</b>  | <b>\$ (170,881.35)</b>  | <b>\$ (132,301.76)</b>  | <b>\$ (159,962.14)</b>  | <b>\$ (936,651.76)</b>   |
| <b>Net Electric Revenues Billed</b>   |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                         |                          |
| Residential - R & MMA   | \$ 5,393,276.82         | \$ 4,223,421.23         | \$ 4,715,873.43         | \$ 3,438,319.44         | \$ 3,588,371.84         | \$ 4,093,841.83         | \$ 5,288,188.68         | \$ 6,074,847.48         | \$ 4,806,306.72         | \$ 3,729,710.08         | \$ 2,946,835.82         | \$ 3,626,547.02         | \$ 51,925,540.39         |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 1,717,769.09            | 1,593,509.85            | 1,441,634.58            | 1,377,351.02            | 1,381,874.60            | 1,290,688.21            | 1,284,592.93            | 1,357,219.39            | 1,363,267.65            | 551,111.07              | 1,203,101.82            | 1,306,968.31            | 15,869,088.52            |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 25,202,601.41           | 22,857,466.27           | 24,152,555.89           | 22,989,801.55           | 25,024,599.35           | 28,733,033.98           | 29,443,948.29           | 34,325,870.02           | 29,666,998.05           | 29,118,022.60           | 26,718,597.29           | 25,174,034.88           | 323,407,529.58           |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                       | -                        |
| <b>Total</b>  | <b>\$ 32,313,647.32</b> | <b>\$ 28,674,397.35</b> | <b>\$ 30,310,063.90</b> | <b>\$ 27,805,472.01</b> | <b>\$ 29,994,845.79</b> | <b>\$ 34,117,564.02</b> | <b>\$ 36,016,729.90</b> | <b>\$ 41,757,936.89</b> | <b>\$ 35,836,572.42</b> | <b>\$ 33,398,843.75</b> | <b>\$ 30,868,534.93</b> | <b>\$ 30,107,550.21</b> | <b>\$ 391,202,158.49</b> |

|   |
|---|
| Potomac Electric Power Company - DISTRICT of COLUMBIA |
| Purchase of Receivable Data                           |
| January through December 2023                         |

|   | Jan-23                 | Feb-23                 | Mar-23                 | Apr-23                 | May-23                 | Jun-23                 | Jul-23                 | Aug-23                 | Sep-23                 | Oct-23                 | Nov-23                 | Dec-23                 | TOTAL                    |
|---|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|--------------------------|
| <b>Late Fee Revenues</b>  |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                          |
| Residential - R & MMA   | \$ (40,733.56)         | \$ (38,762.00)         | \$ (37,249.16)         | \$ (21,736.58)         | \$ (30,013.52)         | \$ (22,152.73)         | \$ (37,907.46)         | \$ (46,485.20)         | \$ (36,269.67)         | \$ (28,125.83)         | \$ (18,434.80)         | \$ (30,807.39)         | \$ (388,677.90)          |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | (12,973.72)            | (14,625.02)            | (11,387.01)            | (8,707.42)             | (11,558.15)            | (6,984.21)             | (9,208.38)             | (10,050.00)            | (9,954.06)             | (4,087.61)             | (7,282.56)             | (10,747.68)            | (117,565.82)             |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | (190,346.56)           | (209,782.79)           | (190,773.25)           | (145,338.31)           | (209,308.41)           | (155,481.14)           | (211,063.83)           | (252,196.50)           | (214,931.07)           | (210,704.01)           | (160,460.81)           | (205,382.04)           | (2,355,768.72)           |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                        |
| <b>Total</b>  | <b>\$ (244,053.84)</b> | <b>\$ (263,169.81)</b> | <b>\$ (239,409.42)</b> | <b>\$ (175,782.31)</b> | <b>\$ (250,880.08)</b> | <b>\$ (184,618.08)</b> | <b>\$ (258,179.67)</b> | <b>\$ (308,731.70)</b> | <b>\$ (261,154.80)</b> | <b>\$ (242,917.45)</b> | <b>\$ (186,178.17)</b> | <b>\$ (246,937.11)</b> | <b>\$ (2,862,012.44)</b> |
| <b>Write Offs</b>   |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                          |
| Residential - R & MMA   | \$ 330,163.50          | \$ 436,584.61          | \$ 318,216.84          | \$ 249,506.91          | \$ 163,457.04          | \$ 122,232.49          | \$ 195,142.41          | \$ 325,779.10          | \$ 366,850.92          | \$ 530,279.64          | \$ 523,313.60          | \$ 343,594.84          | \$ 3,905,121.90          |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 5,467.50               | 18,080.59              | 7,321.81               | 14,798.38              | 310.69                 | (1,447.65)             | 40,942.48              | 3,901.04               | 6,180.51               | 12,850.65              | 6,377.54               | -                      | 114,783.54               |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 17,831.78              | 774.95                 | 56,498.80              | 15,707.59              | -                      | 496.45                 | 14,737.60              | 9,821.93               | 7,358.98               | 7,384.44               | 890.52                 | 2,901.20               | 134,404.24               |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                        |
| <b>Total</b>  | <b>\$ 353,462.78</b>   | <b>\$ 455,440.15</b>   | <b>\$ 382,037.45</b>   | <b>\$ 280,012.88</b>   | <b>\$ 163,767.73</b>   | <b>\$ 121,281.29</b>   | <b>\$ 250,822.49</b>   | <b>\$ 339,502.07</b>   | <b>\$ 380,390.41</b>   | <b>\$ 550,514.73</b>   | <b>\$ 530,581.66</b>   | <b>\$ 346,496.04</b>   | <b>\$ 4,154,309.68</b>   |
| <b>Over / (Under) Collections</b>   |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                        |                          |
| Residential - R & MMA   | \$ (289,429.94)        | \$ (397,822.61)        | \$ (280,967.68)        | \$ (227,770.33)        | \$ (133,443.52)        | \$ (100,079.76)        | \$ (157,234.95)        | \$ (27,151.07)         | \$ (130,574.73)        | \$ (345,044.63)        | \$ (382,106.13)        | \$ (163,218.54)        | \$ (2,634,843.89)        |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 7,506.22               | (3,455.57)             | 4,065.20               | (6,090.96)             | 11,247.46              | 8,431.86               | (31,734.10)            | 16,811.53              | 14,468.14              | 5,009.13               | 10,434.11              | 21,140.91              | 57,833.93                |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 172,514.78             | 209,007.84             | 134,274.45             | 129,630.72             | 209,308.41             | 154,984.69             | 196,326.23             | 242,374.57             | 207,572.09             | 203,319.57             | 159,570.29             | 202,480.84             | 2,221,364.48             |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                        |
| <b>Total</b>  | <b>\$ (109,408.94)</b> | <b>\$ (192,270.34)</b> | <b>\$ (142,628.03)</b> | <b>\$ (104,230.57)</b> | <b>\$ 87,112.35</b>    | <b>\$ 63,336.79</b>    | <b>\$ 7,357.18</b>     | <b>\$ 232,035.03</b>   | <b>\$ 91,465.50</b>    | <b>\$ (136,715.93)</b> | <b>\$ (212,101.73)</b> | <b>\$ 60,403.21</b>    | <b>\$ (355,645.48)</b>   |

Potomac Electric Power Company - DISTRICT of COLUMBIA

Purchase of Receivable Data

January through December 2023

|   | Jan-23                 | Feb-23                 | Mar-23                 | Apr-23                 | May-23                 | Jun-23                 | Jul-23                 | Aug-23                 | Sep-23                | Oct-23                 | Nov-23                 | Dec-23                 | TOTAL                 |
|---|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|------------------------|-----------------------|------------------------|------------------------|------------------------|-----------------------|
| <b>Cumulative Over / (Under) Collections</b>                                    |                        |                        |                        |                        |                        |                        |                        |                        |                       |                        |                        |                        |                       |
| Residential - R & MMA   | \$ (289,429.94)        | \$ (687,252.55)        | \$ (968,220.23)        | \$ (1,195,990.56)      | \$ (1,329,434.08)      | \$ (1,429,513.84)      | \$ (1,586,748.79)      | \$ (1,613,899.86)      | \$ (1,744,474.59)     | \$ (2,089,519.22)      | \$ (2,471,625.35)      | \$ (2,634,843.89)      |                       |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 7,506.22               | 4,050.65               | 8,115.85               | 2,024.89               | 13,272.35              | 21,704.21              | (10,029.89)            | 6,781.64               | 21,249.78             | 26,258.91              | 36,693.02              | 57,833.93              |                       |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 172,514.78             | 381,522.62             | 515,797.07             | 645,427.79             | 854,736.20             | 1,009,720.89           | 1,206,047.12           | 1,448,421.69           | 1,655,993.78          | 1,859,313.35           | 2,018,883.64           | 2,221,364.48           |                       |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                     | -                      | -                      | -                      |                       |
| <b>Total</b>  | <b>\$ (109,408.94)</b> | <b>\$ (301,679.28)</b> | <b>\$ (444,307.31)</b> | <b>\$ (548,537.88)</b> | <b>\$ (461,425.53)</b> | <b>\$ (398,088.74)</b> | <b>\$ (390,731.56)</b> | <b>\$ (158,696.53)</b> | <b>\$ (67,231.03)</b> | <b>\$ (203,946.96)</b> | <b>\$ (416,048.69)</b> | <b>\$ (355,645.48)</b> |                       |
| <b>Interest (1)</b>   |                        |                        |                        |                        |                        |                        |                        |                        |                       |                        |                        |                        |                       |
| Residential - R & MMA   | \$ (1,729.34)          | \$ (4,106.33)          | \$ (5,785.12)          | \$ (7,146.04)          | \$ (7,943.37)          | \$ (8,541.35)          | \$ (9,480.82)          | \$ (9,643.05)          | \$ (10,423.24)        | \$ (12,484.88)         | \$ (14,767.96)         | \$ (15,743.19)         | \$ (107,794.69)       |
| Small Commercial - GS-LV-ND, T, SL, TS, TN and OL-LED                           | 44.85                  | 24.20                  | 48.49                  | 12.10                  | 79.30                  | 129.68                 | (59.93)                | 40.52                  | 126.97                | 156.90                 | 219.24                 | 345.56                 | 1,167.88              |
| Large Commercial - GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B, RT                | 1,030.78               | 2,279.60               | 3,081.89               | 3,856.43               | 5,107.05               | 6,033.08               | 7,206.13               | 8,654.32               | 9,894.56              | 11,109.40              | 12,062.83              | 13,272.65              | 83,588.72             |
| Market Price Service - GS-LV-ND, GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, T, SL & TS | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                      | -                     | -                      | -                      | -                      | -                     |
| <b>Total</b>  | <b>\$ (653.71)</b>     | <b>\$ (1,802.53)</b>   | <b>\$ (2,654.74)</b>   | <b>\$ (3,277.51)</b>   | <b>\$ (2,757.02)</b>   | <b>\$ (2,378.59)</b>   | <b>\$ (2,334.62)</b>   | <b>\$ (948.21)</b>     | <b>\$ (401.71)</b>    | <b>\$ (1,218.58)</b>   | <b>\$ (2,485.89)</b>   | <b>\$ (2,124.98)</b>   | <b>\$ (23,038.09)</b> |

(1) The allowed Rate of Return per F.C. No. 1156 is: 7.17% effective from July 2021.

# **ATTACHMENT D**

Pepco - District of Columbia  
Purchase of Receivables  
Reconciliation and Interest Factor  
January through December 2023

|  | RESIDENTIAL -<br>Schedules R & MMA | SMALL<br>COMMERCIAL -<br>Schedules GS-LV-ND,<br>T, SL, TS, TN and OL-<br>LED | LARGE<br>COMMERCIAL -<br>Schedules GS-LV, GS-<br>3A, MGT-LV, GT-LV,<br>GT-3A, GT-3B and<br>RT | MARKET PRICE<br>SERVICE (MPS) -<br>Schedules GS-LV-ND,<br>GS-LV, GS-3A, MGT-<br>LV, GT-LV, GT-3A, T,<br>SL & TS |
|--|------------------------------------|--|---|---|
| 1.1 POR Discount - Year 1  | \$ 795,512.07                      | \$ 96,216.66   | \$ 903,744.48   | \$ 4,824.61   |
| 1.2 POR Discount - Year 2  | 1,054,935.19                       | 102,389.83   | 735,716.79  | 14,183.37   |
| 1.3 POR Discount - Year 3  | 260,919.76                         | -  | -   | 1,222.87  |
| 1.4 POR Discount - Year 4  | 95,188.96                          | -  | -   | 2,321.83  |
| 1.5 POR Discount - Year 5  | (60.81)                            | (30.99)  | 301.50  | -   |
| 1.6 POR Discount - Year 6  | (470.65)                           | (85.13)  | (129.92)  | (1.22)  |
| 1.7 POR Discount - Year 7  | -                                  | -  | -   | -   |
| 1.8 POR Discount - Year 8  | -                                  | -  | -   | -   |
| 1.9 POR Discount - Year 9  | 881,600.11                         | 55,051.65  | -   | -   |
| 2.1 Write-Offs - Year 1  | 411,632.23                         | 9,808.02   | 13,739.72   | 15,682.53   |
| 2.2 Write-Offs - Year 2  | 1,700,752.06                       | 64,325.47  | 301,024.65  | 444.90  |
| 2.3 Write-Offs - Year 3  | 901,759.14                         | 70,282.55  | 338,659.01  | (1,234.89)  |
| 2.4 Write-Offs - Year 4  | 896,472.15                         | 40,722.50  | 75,270.55   | -   |
| 2.5 Write-Offs - Year 5  | 591,257.78                         | 40,124.82  | 156,979.11  | -   |
| 2.6 Write-Offs - Year 6  | 101,027.38                         | 23,782.57  | 145,475.01  | -   |
| 2.7 Write-Offs - Year 7  | 126,975.50                         | 11,801.26  | 144,010.15  | -   |
| 2.8 Write-Offs - Year 8  | 2,055,949.00                       | 203,037.39   | 280,922.18  | -   |
| 2.9 Write-Offs - Year 9  | (1) 1,952,560.95                   | 114,783.54   | 134,404.24  | -   |
| 3.2 Late Fee Revenues  | 1,005,482.68                       | 191,389.67   | 660,159.17  | 511.65  |
| 3.3 Late Fee Revenues  | 1,030,689.76                       | 98,238.23  | 759,467.25  | 3,683.94  |
| 3.4 Late Fee Revenues  | 482,993.44                         | 51,525.03  | 912,093.27  | 2,785.66  |
| 3.5 Late Fee Revenues  | 211,325.71                         | 36,369.01  | 1,168,169.22  | 1,137.50  |
| 3.6 Late Fee Revenues  | 42,190.99                          | 8,101.22   | (331,280.49)  | 651.99  |
| 3.7 Late Fee Revenues  | 5,740.20                           | 561.26   | 31,529.54   | -   |
| 3.8 Late Fee Revenues  | 381,627.91                         | 21,956.01  | 1,056,692.52  | -   |
| 3.9 Late Fee Revenues  | 388,677.90                         | 117,565.82   | 2,355,768.72  | -   |
| 4.1 Interest Expense/(Revenue) - Year 1  | 31,564.38                          | 4,522.15   | 47,110.77   | (253.92)  |
| 4.2 Interest Expense/(Revenue) - Year 2  | 5,405.17                           | 6,857.69   | 53,184.01   | 843.33  |
| 4.3 Interest Expense/(Revenue) - Year 3  | 20,828.80                          | 627.33   | 19,088.41   | 374.03  |
| 4.4 Interest Expense/(Revenue) - Year 4  | (3,005.70)                         | 811.63   | 22,644.46   | 240.41  |
| 4.5 Interest Expense/(Revenue) - Year 5  | (18,119.66)                        | (436.27)   | 42,555.67   | 46.36   |
| 4.6 Interest Expense/(Revenue) - Year 6  | (5,352.65)                         | (1,139.94)   | (11,474.21)   | 45.38   |
| 4.7 Interest Expense/(Revenue) - Year 7  | 114.25                             | (155.48)   | (7,372.43)  | -   |
| 4.8 Interest Expense/(Revenue) - Year 8  | (86,748.61)                        | (4,088.09)   | 17,064.97   | -   |
| 4.9 Interest Expense/(Revenue) - Year 9  | (107,794.69)                       | 1,167.88   | 83,588.72   | -   |
| 5 Cumulative Over/(Under) Collection   | (1-2+3+4) (2,265,141.68)           | 208,747.05   | 6,928,137.80  | 17,725.25   |
| 6 Amortization of Program Cost   | 10,106.46                          | 1,284.66   | 77,228.10   | 6,646.50  |
| 7 Cumulative Over / (Under) Collection - Net of Amortization   | (5-6) \$ (2,275,248.14)            | \$ 207,462.39  | \$ 6,850,909.70   | \$ 11,078.75  |
| 8 Interest   | \$ (107,794.69)                    | \$ 1,167.88  | \$ 83,588.72  | \$ -  |
| 9 Electric Revenues Billed (01/23 -12/23)  | \$ 52,807,140.50                   | \$ 15,924,140.17   | \$ 323,407,529.58   | \$ -  |
| 10 Reconciliation Factor   | (7/9) -4.3086%                     | 1.3028%  | 2.1184%   | 0.0000%   |
| 11 Interest Factor   | (8/9) -0.2041%                     | 0.0073%  | 0.0258%   | 0.0000%   |
| (1) The 9th Filing Residential Write-Off of \$3,905,121.90 for the period January 2023 through December 2023 will be amortized over two years: |                                    |  |   |   |
| To be recovered over the next year:  | \$ 1,952,560.95                    |  | for the period of 2023 to 2024  | \$ 1,952,560.95   |
|  | \$ 1,952,560.95                    |  | for the period of 2024 to 2025  | \$ -  |
|  | \$ 3,905,121.90                    |  |   | \$ 1,952,560.95   |

## CERTIFICATE OF SERVICE

I hereby certify that a true copy of Pepco's Motion for Leave to Reply and Limited Reply Comments was served on the parties of record in Formal Case No. PEPPOR by electronic mail this 1<sup>st</sup> day of July 2024.

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/s/ Dennis P. Jamouneau

Dennis P. Jamouneau