

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL



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Public Advocacy Division
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ELECTRONIC FILING

August 30, 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. 1176 – In the Matter of the Application of Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia.

Dear Ms. Westbrook-Sedgwick:

On behalf of the District of Columbia Government, please find enclosed its Post-Legislative-Style Hearing Brief in the above-captioned proceeding. If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

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

**In the Matter of the Application of Potomac)
Electric Power Company for Authority to)
Implement a Multiyear Rate Plan) Formal Case No. 1176
for Electric Distribution Service in the)
District of Columbia)**

**DISTRICT OF COLUMBIA GOVERNMENT’S
POST LEGISLATIVE-STYLE HEARING BRIEF**

Pursuant to Order No. 22013 of the Public Service Commission of the District of Columbia (Commission or PSC), as modified by Order No. 22015, the District of Columbia Government (DCG or the District), through the Office of the Attorney General, respectfully submits its Post Legislative-Style Hearing Brief in the above-captioned proceeding. The District incorporates by reference into this Post Legislative-Style Hearing Brief, the entirety of its Limited Brief in Advance of Legislative Style Hearing filed on July 24, 2024, as well as the entirety of the Transcript from the Legislative Style Hearing on July 30, 2024.

I. INTRODUCTION

At the outset of its order establishing overarching framework principles for a utility seeking Alternative Form of Ratemaking (AFOR) treatment, the Commission adopts a statement from the District Government regarding multiyear rate plans (MYP) that “if designed well, multiyear rate plans can provide benefits to customers and help achieve public policy goals.”¹ The Commission then identifies a list of properties or characteristics that a well-designed AFOR, including an MYP, must have as part of the overarching framework. Among other things, a

¹ Formal Case No. 1156, *In the Matter of the Application of the Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia*, Order No. 20273, ¶ 5 (rel. Dec. 20, 2019) (internal quotes omitted).

well-designed AFOR ought to: (1) protect consumers; (2) advance the preservation of environmental quality including effects on global climate change and the District's public climate commitments; (3) align with the District's public policy goals; (4) clearly explain what process or mechanisms a utility used to project revenues and expenses; (5) provide benefits that are measurable, quantitative, and qualitative to customers as opposed to solely focusing on the AFOR's benefits to the utility; (6) fostering productivity and cost control; . . . (8) the risk of overearning a utility's authorized rate of return will be mitigated during the term of the AFOR for the benefit of customers; (9) the AFOR provides an appropriate level of transparency and reporting into the utility's operational and capital plans ensuring that the plans will be maintained during the duration of the AFOR; (10) the AFOR avoid any unnecessary shifting of risk to utility customers.²

But Pepco's MYP does none of these things. In fact, as will be explained below, in many instances, Pepco's MYP displays the opposite characteristic of what a well-designed MYP should possess. The District reiterates that a well-designed MYP can provide benefits to customers and help to achieve public policy goals. But a poorly designed MYP cannot. Unfortunately, Pepco's MYP is poorly designed. The Commission should reject it and act on the Company's traditional cost of service application instead.

II. ARGUMENT

A. Pepco's Cost Forecasting Methodology is Unreasonable.

The cost forecasting methodology Pepco proposes in its MYP is flawed and because it does not provide an appropriate level of transparency into Pepco's operational and capital plans

² *Id.* at ¶ 6 (10 listed items hereinafter referred to as principles).

such that there is any assurance that the plans will be maintained throughout the MYP term.³

Rather than hewing to the Pilot EMRP's method of using a fixed escalation factor for business-as-usual expenses like capital plant additions and O&M expenses, Pepco proposes in this MYP to use a Company-specific forecast for revenues and expenses to estimate future costs based on its Long-Range Plan (LRP). Pepco's proposed methodology is unreasonable and should be rejected for several reasons.

First, Pepco's proposed methodology unnecessarily shifts risk to ratepayers, which violates the Commission's AFOR principles.⁴ Pepco has a clear incentive to overstate costs and understate revenues to ensure that it never overspends its allowed revenue.⁵ This incentive to overstate costs is manifested in the MYP by the fact that Pepco's forecasted costs in its proposed MYP budget grow significantly year over year to the point at which its forecasted costs for 2026 are almost \$100 million more than its average actual costs over the past 6 years.⁶ Further, as compared to the forecasts that the Company presented in its Pilot EMRP Application, Pepco actually spent \$53 million less in 2021 than it forecasted⁷ (29%) and \$41.2 million less than it forecasted in 2022 (13%).⁸ Pepco did not explain what process or mechanism the Company used to project its costs in violation of the Commission's AFOR principles.⁹

Second, Pepco's cost forecasting methodology is unreasonable because it fails to provide an appropriate level of transparency into the Company's capital investment and operational plans.¹⁰ Due to information asymmetries and the opaque nature of Pepco's capital investment

³ *Id.*, AFOR Principle #9.

⁴ *Id.*, AFOR Principle #10.

⁵ DCG (A), at 16:12-17.

⁶ See, DCG (A)-2 and DCG (A)-3,

⁷ Formal Case No. 1156, Pepco Final Reconciliation for Modified Enhanced Multiyear Rate Plan (EMRP), March 31, 2022, Appendix 1, Schedule 3X - District of Columbia - Annual Reconciliation Filing - Capital Additions.

⁸ *Id.* Schedule 2.

⁹ *Supra*, note 2, AFOR Principle #4.

¹⁰ *Id.* AFOR Principle #9.

plans, it is extremely difficult for the Commission or interveners to know whether any of Pepco's proposed LRP investments are necessary and based on prudent management. This is extremely problematic given the regulatory incentive structure, which is heavily skewed towards capital investments because capital investments add to rate base as opposed to one-time O&M expenses. Indeed, as proposed by Pepco, the Company can earn an ongoing rate of return (i.e. profits) on its capital investments for decades.

It is for the above reasons that the District identified Pepco's lack of an Integrated Distribution Plan (IDP) and Grid Modernization Plan as a fundamental issue that should lead this Commission to reject Pepco's MYP.¹¹ These plans are vital tools for the Commission and stakeholders. An IDP combined with a Grid Modernization Plan can place a utility's proposed investments into a larger picture to provide context for the proposed investments and enable the Commission and stakeholders to assess whether the proposed investments are needed to achieve a particular purpose. Also, the Commission and stakeholders can assess whether there are lower cost alternatives to traditional capital investments that advance the District's goals for providing affordable and clean electricity, including in the area of Non-Wires Alternatives (NWA). However, because Pepco classifies NWAs as O&M expenses, the Company has an inherent disincentive to select NWAs over traditional capital investments such as substations, transformers, and feeders. This inherent disincentive by utilities to select NWA solutions is illustrated by the fact that Pepco has not implemented a single NWA solution in the District of Columbia, with the sole exception of a 1 MW battery NWA solution Pepco proposed in the

¹¹ See F.C. 1176, DCG's Limited Brief in Advance of Legislative-Style Hearing, pgs. 4-6 (filed July 24, 2024), and Transcript from July 30, 2024 Legislative-Style Hearing (T) T:134:11-151:4.

course of litigation against the District to obtain PSC authorization to construct a \$143 million substation at Mt. Vernon Square.¹²

For this reason, the District also identified the lack of an NWA Performance Incentive Mechanism (PIM), as proposed in DCG Witness Lane's Direct Testimony, as a fundamental issue that should lead the Commission to reject Pepco MYP.¹³ Without an NWA PIM as part of Pepco's MYP, there is little prospect that Pepco will voluntarily implement an NWA solution as an alternative to expensive traditional capital investments, despite the significantly lower cost to ratepayers and climate-friendly attributes NWAs possess that actually advance the District's clean energy policies.

B. Pepco's Annual Reconciliation Process Disincentivizes Cost Containment.

Traditional cost of service rate regulation based on a historical test year has been the norm in utility ratemaking around the country for over a century. There is a reason for that: cost containment. If a utility's costs exceed its revenues, it will operate at a loss until it can obtain a revenue increase through a one-time rate increase. However, even when the utility is operating at a loss, it must still establish that its costs were reasonably incurred and produced used and useful assets in order to be reimbursed through increased rates.

On the other hand, the MYP proposed by Pepco flips these traditional protections on their head. The annual reconciliation process Pepco proposes virtually guarantees that Pepco will never take on the risk of operating at a loss for any significant amount of time and will be made whole through the annual reconciliation process at the end of each MYP year. And again, due to information asymmetries and the lack of an IDP and Grid Modernization Plan, the prudence

¹² See Formal Case No. 1144, *In the Matter of the Potomac Electric Power Company's Notice To Construct Two 230kV Underground Circuits from the Takoma Substation To the Rebuilt Harvard Substation, and from the Rebuilt Harvard Substation To the Rebuilt Champlain Substation (Capital Grid Project)*, Order No. 20274, ¶106 (rel. Dec. 20, 2019).

¹³ *Supra* note 2.

reviews Pepco propose in its MYP in conjunction with the annual reconciliation process serve only a perfunctory role in protecting against imprudent investments that are difficult to identify and challenging to claw back after ratepayer funds have already been expended. The impact of inflated cost forecasts is bad enough on its own, but when combined with a flawed reconciliation process that disincentivizes cost containment, the result is a form of ratemaking that will almost certainly produce rates at levels that exceed what they would otherwise be under traditional cost of service regulation.

C. Pepco’s MYP is Designed to Lock District Ratepayers into Guaranteed Annual Rate Increases for the Foreseeable Future.

One particularly disconcerting aspect of Pepco proposed MYP is Pepco’s so-called “consolidated reconciliation” and prudence review that would serve as a bridge between three-year MYP applications. During the final year of the MYP term, Pepco would file its consolidated reconciliation consisting of all costs in the previous two years and all available third year costs up until the time of filing *as part of its next MYP application*. All adjustments and reconciliations resulting from this process would be moved into rate base on a case-by-case basis as part of the new rate order on Pepco’s next MYP.¹⁴ Unlike the Pilot EMRP that contained a one-year stay out provision during which Pepco was prohibited from filing a new rate application, this MYP, if adopted as proposed, would ensure that Pepco receives annual rate increases on January First of every year for the foreseeable future.

¹⁴ For the period between the filing of the consolidated reconciliation and the end of the MYP term, there would be a final reconciliation and prudence review that would address any investments and costs in the MYP that were not previously included in the consolidated reconciliation and prudence review. As part of this reconciliation process, Pepco would propose a rider mechanism to adjust customer rates for any over- or under-collections ultimately approved by the Commission. In the case of over-collection (i.e., the Company spent less than its allowed revenues), the carrying costs would continue to apply during the period of any repayment to customers. In the case of under-collection (i.e., the Company spent more than its allowed revenues), the only penalty the Company would experience not be allowed to recover carrying costs associated with the overspend.

Thus, Pepco's MYP as proposed would effectively foreclose any meaningful opportunity for the Commission and parties to further evaluate whether Pepco's MYP is in the public interest consistent with the overarching framework established in the Commission's policy order on Alternative Forms of Ratemaking (AFOR). At all times, there would be an MYP in effect, and District of Columbia ratepayers would be effectively locked into MYP regulation going forward, flouting over a century of precedent that setting rates are to be based on historical cost of service regulation. That is not a step the Commission should take lightly.

D. The Record of this Proceeding Does Not Support Approval of Pepco's MYP.

The record of this case does not and cannot support approval to Pepco's MYP. Pepco cannot point to any measurable, qualitative or quantitative, benefits of its MYP either to its customers, or to the District's climate and energy goals, despite the District's repeated requests to produce such information.¹⁵ Moreover, there is no evidentiary record from which such benefits could be gleaned.¹⁶ No evidentiary hearings have been held to cross-examine Pepco's witnesses under oath or to authenticate documents. Meanwhile significant inconsistencies in the Companies' financial reporting have been uncovered, but not further probed.¹⁷ The support on record consists entirely of unverified, self-serving statements from the Company about the benefits of the EMRP Pilot.¹⁸ But upon closer examination many of the Company's claimed benefits of the pilot EMRP fall flat.¹⁹

In fact, it was precisely due to an incomplete record (even after holding evidentiary hearings) that the Maryland Public Service Commission (MD PSC) recently rejected Pepco's

¹⁵ DCG (A)-25,

¹⁶ DCG (A)-26.

¹⁷ F.C. 1176, Motion to Dismiss or, in the Alternative, Motion for Summary Judgment by the Office of the People's Counsel for the District of Columbia and the Apartment and Office Building Association of Metropolitan Washington (filed, June 10, 2024).

¹⁸ See generally, F.C. 1176 Pepco Supplementary Direct Testimony (filed, Aug. 31, 2023),

¹⁹ See DCG (A), at pgs 59-60.

second proposed MYP that is very similar to the instant MYP application. The MD PSC rejected Pepco's second MYP because the Company had prematurely filed the application before a full assessment of lessons learned could be conducted on Pepco's first MYP that, like in DC, was also approved on a pilot basis. In so doing, the MD PSC noted the arguments of parties that "ratepayers could be harmed by approving annual base rates for a utility for three years into the future without considering those lessons." Thus, the MD PSC determined that approval of Pepco's second MYP would be "premature" and would ignore the "chorus of intervenors" urging the MD PSC to consider other forms of ratemaking. Most striking was the fact that, unlike this Commission that required Pepco to file an accompanying traditional cost of service rate application along with the MYP application, the MD PSC rejected Pepco's MYP even in the absence of a separate traditional rate case application.

E. Pending Supply Costs at PJM will Exacerbate the Harm that Would Result From Pepco's MYP.

There is an additional factor that the Commission should consider when evaluating whether Pepco's proposed MYP is likely to produce just and reasonable rates. Pending increases in the cost for Standard Offer Service supply rates at PJM are projected to be significant. For delivery year 2025/2026, PJM's base residual auction resulted in significantly higher preliminary zonal net load prices relative to delivery year 2024/2025. As a result, once delivery year 2025/2026 begins in June 2025, residential customers throughout the District of Columbia will face higher energy bills resulting from these increased capacity prices.

The District asked Synapse to look into the impacts of these projected increases. Synapse estimates that, due to these increased capacity prices, an average usage residential customer of Pepco's Standard Offer Service (SOS) in the District of Columbia will experience a \$9.52/month increase on their bill for energy supply. This increase would be on top of Pepco's proposed

distribution rate increase of \$6.18/month in year one of the MRP. Thus, the overall increase on Pepco bills for residential SOS customers would be about \$15.70.

Even worse, according to a recent Utility Dive article, analysts from Morgan Stanley estimate that capacity prices from PJM's next capacity auction – scheduled for this upcoming December 2024 – could be even higher than the already-record-high July 2024 auction.²⁰ The projections of additional price increases are due to a tightening of supply and increase in forecasted demand for Delivery Year 2026/2027. While actual capacity prices for Delivery Year 2026/2027 will not be known until the December auction occurs, and the Utility Dive article discusses scenarios under which prices will not rise as high as the full auction price cap, there is a significant chance of additional capacity price increases on the horizon, according to Morgan Stanley. In light of these significant increases in wholesale electricity costs, it is more important than ever that Pepco operate under a rate model that includes appropriate incentives for controlling costs and proposes investments that can be properly evaluated in the context of a long-term Integrated Distribution Plan and Grid Modernization Plan.

F. The Commission Should Defer Acting on Pepco's Proposed Changes to the Residential Aid Discount (RAD) Program Qualifications Until the Proposal has been Thoroughly Vetted by the Utility Discount Program Education Working Group (UDPE WG) in Formal Case No. 1125. The District Supports the Concept of Automatic Enrollment of RAD Customers in an Arrearage Management Program (AMP), but More Details Need to be Fleshed Out Through Work in a Dedicated Proceeding.

Pepco seeks to expand RAD participation through the use of categorical eligibility. This is not a new idea, and it has been used in other jurisdictions as well as in the District's

²⁰ https://www.utilitydive.com/news/pjm-capacity-prices-auction-morgan-stanley-esai-nrg-vistra-pseg/725618/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202024-08-29%20Utility%20Dive%20Newsletter%20%5Bissue:65391%5D&utm_term=Utility%20Dive

administration of other income-limited programs.²¹ But the details matter a great deal, and Pepco simply has not provided the details necessary to properly consider this proposal, implement it effectively, or manage the impacts on and coordination with other District agencies.

Under a “categorical eligibility” program, if a household qualifies for one type of assistance program, the household would automatically qualify for another program (in Pepco’s proposed case, that other program would be RAD). But just because a customer is “categorically eligible” for RAD does not mean that processing that customer’s application would be cost-less or process-less. Pepco has not coordinated with the District Department of Energy and Environment (DOEE) or the Office of the People’s Counsel (OPC) to determine what the proposed process would look like and involve. That is a necessary first step towards advancing an actionable proposal because DOEE does not want to see unintended consequences to its low-income customers from the implementation of a new administrative process for this expanded RAD program. These consequences could include, among others, a reduction in overall utility assistance if customers enroll in RAD through Pepco and do not then receive additional forms of utility assistance that DOEE administers, such as LIHEAP and Solar for All. DOEE is well aware of the best practices involved in the use of categorical eligibility to increase and simplify program enrollment as it uses that process in its Solar for All program. Having this initial discussion on program design between DOEE and Pepco would ensure that whatever process is created incorporates those best practices.

²¹ See for instance DOEE’s Income Verification Rules for the Solar for All program: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/Income%20Verification%20Memo%20hk2-signed%20signed%20TW.pdf

Furthermore, while DOEE is not necessarily opposed to Pepco's proposal, a rate case is not the proper forum for addressing UDP program changes that do not involve changes to the actual discount rate or structure itself but are instead administrative in nature. Efforts to expand UDP enrollment is the core mission of the UDPE WG who meet regularly and whose activities are overseen by the PSC in the FC 1125 docket. Moreover, changing eligibility requirements for one UDP but not others could have unintended consequences such as creating confusion, and be more costly and administratively burdensome to administer. Indeed, DOEE's experience with different eligibility requirements between the different DC Water Customer Assistant Programs (CAP) -- CAP 1 and CAP 2 -- has borne this out. A more in-depth discussion of Pepco's proposal should be had among the UDPE WG members as it may make sense to expand categorical enrollment to all UDPs.

As part of that stakeholder consultation process, DOEE, OPC, and Pepco can also discuss the possibility of automatically enrolling RAD customers into Pepco's AMP. The District supports the concept behind Pepco's proposal to automatically enroll qualifying RAD customers into Pepco's AMP if they are in arrears. The need is there. According to Pepco's most recent monthly report in the ARDIR docket, the number of RAD customers in arrears during the first six months of 2024 is roughly 80% - 90% of all RAD customers.²² Automatically enrolling Pepco's RAD customers in arrears into Pepco's AMP program could benefit a significant segment of Pepco's low-income customer base.

However, DOEE is concerned about an administrative provision that is currently embedded in Pepco's management of the AMP program, which bars AMP participants for 7 years if they do not complete all of its requirements. This provision, especially if it applies to

²² ARDIR, Pepco

more customers who may not understand it through automatic enrollment, could have unintended consequences for low-income residents. DOEE would like to have further discussions with Pepco to address these potential unintended consequences up-front before this provision is approved and implemented.

Moreover, those discussions would benefit from a review of Washington Gas Light's (WGL) pilot initiative to automatically enroll customers participating in WGL's Residential Essential Service (RES) discount program into its AMP. That pilot has the potential to positively impact a great number of low-income households as well, but DOEE has also heard reports that some customers are unaware of the AMP requirements when they are enrolled via the automatic enrollment mechanism. Any proposals to expand the use of automatic enrollments into AMPs should first be discussed with DOEE, OPC, and the UDPE WG to ensure the processes are well-designed and do not result in negative unintended consequences for customers. If the Commission authorizes Pepco's automatic enrollment of its RAD customers into the AMP, on either a permanent or pilot basis, the Commission should also require Pepco to add the number of RAD customers participating in AMP and the monthly amount subject to forgiveness to its monthly ARDIR report.

G. Regardless of whether the Commission approves the MYP, the Commission Should Direct the Rate Design Working Group to Monitor the Efficacy of Pepco's Two Proposed Time of Use Rates and Require Pepco to Report Annually on their Impacts.

As part of its Application, Pepco proposes two new Time of Use (TOU) rates. The first is a Residential TOU rate, which would replace Pepco's Residential Plug In Vehicle (PIV) rate. The Residential TOU rate would designate 5:00 p.m. to 10:00 p.m. Monday through Friday (excluding government holidays) as peak hours, with the rest of the time being off-peak hours. The Residential TOU would contain separate time-varying components for distribution, generation, and transmission.

Pepco also proposes a suite of Electric Vehicle (EV) TOU charging rates, which generally have an on peak time window of 6:00 a.m. to 8:00 p.m. During this peak time, energy and demand charge components of these rates would be twice the amount as during off peak times. The motivation behind both rates is to encourage customers to switch usage to off-peak hours when demand on Pepco's system is lower, which could save customers money and promote decarbonization. However, rate designs that are designed to produce changes in customer usage require evaluation and regular improvements to ensure they are meeting their intended goals.

For that reason, if the Commission approves of these proposals in concept, the District recommends that the Commission take the following two actions with respect to these TOU rates. First, the Commission should direct Pepco to file an annual report evaluating the impact of time-varying rates on customer usage, grid constraints, and the deployment of clean energy technologies. Second, the Commission should reconvene the Rate Design Working Group in Formal Case No. 1130 to (a) monitor implementation of the new rates, and (b) suggest and develop improvements to these rates. The Rate Design Working Group should also provide input into the annual reports Pepco files on these rates. To facilitate that input, the Commission should direct Pepco to provide the Rate Design Working Group with a draft copy of the annual report at least 60 days before it is finalized.

III. CONCLUSION

Wherefore, for the reasons discussed above, the Commission should reject Pepco's proposed MYP and instead act on Pepco's traditional cost of service rate application. Further, the Commission should defer acting on Pepco's RAD-related requests, including to qualify RAD program participants through "categorical eligibility" or automatically enrolling RAD customers into Pepco's AMP. Instead, the Commission should direct Pepco to engage members of the

UDPE WG to vet these issues and provide a recommendation to the Commission for consideration. Finally, the Commission should direct the Rate Design Working Group to monitor the efficacy of Pepco's two proposed Time of Use rates and require Pepco to report annually on their impacts.

Respectfully submitted,

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August 30, 2024

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CERTIFICATE OF SERVICE

I hereby certify on this 30th day of August 2024, that I caused true and correct copies of the District of Columbia Government's Post-Legislative-Style Brief to be emailed to the following:

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