

Dennis P. Jamouneau
Assistant General Counsel

EP9628
701 Ninth Street NW
Washington, DC 20068-0001

Office 202.428.1122
Fax 202.331.6767
pepco.com
djamouneau@pepcoholdings.com

September 6, 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: Purchase of Receivable – Docket PEPPOR

Dear Ms. Westbrook-Sedgwick:

On April 30, 2024, Potomac Electric Power Company (“Pepco” or the “Company”) filed a proposed tariff to update the Purchase of Receivables (“POR”) Supplier Discount Rate. On May 17, 2024, the Public Service Commission of the District of Columbia (“Commission”) issued a Notice of Proposed Tariff (“NOPT”) inviting public comments. On June 17, 2024, NRG Energy, Inc. and Constellation NewEnergy, Inc. filed comments in response to the NOPT and Pepco filed responsive comments on July 1, 2024.

On August 7, 2024, the Commission issued Order No. 22259 (“Order”) directing Pepco to modify the POR Discount Rate calculation for the Residential customer class by using Calendar Year 2022 Residential customer class expenses as a proxy for calculating the Company’s 2024 POR Discount Rate in accord with a similar filing approved for Washington Gas Light Company (“WGL”). Pepco made an updated POR filing in response to the Order on August 16, 2024. Subsequently, and in the course of responding to Commission Staff Data Request No. 1, Pepco discussed with Staff the methodology used by the Company in the August 16 compliance filing and related issues.

In the August 16, 2024 compliance filing, Pepco used 2023 data in the Reconciliation Factor calculation, which is consistent with the methodology used by WGL as directed in the Order. Upon receiving Staff Data Request No. 1, and as noted above, Pepco met with Commission Staff on August 28, 2024. During this meeting, Staff clarified that intent of Commission Order No. 22259 was for Pepco to use 2022 Bad Debt Expenses and Late Fees Revenues as a proxy for all components of the calculation including the Write-Offs, Late Payment Revenues, Interest Factor, and the Reconciliation Factor, and Staff requested that the Company resubmit its August 16, 2024 compliance filing utilizing this clarified method.

Ms. Brinda Westbrook-Sedgwick

Page 2

September 6, 2024

Attached is Pepco's revised POR Supplier Discount Rate using Residential Calendar Year 2022 Bad Debt Expenses and Late Fees Revenues as a proxy for calculating the Company's 2024 Residential rate. This revision is intended to wholly supersede the compliance filing made on August 16, 2024. Following this revision, the Company's calculated discount rate on the receivables associated with Residential customers is 7.7466% on Schedules R and MMA.

Accordingly, and as proposed in the attached, Pepco has updated its filing and used Year 2022 Bad Debt Expenses and Late Fees Revenues as proxy for Year 2023 in the Reconciliation Factor calculation. As a result, of the difference between 2023 and 2022 amounts, Pepco will defer a net imbalance of \$1,880,658.91 (Imbalance) for recovery in a future period. This deferral is reasonable and adheres to Pepco's Electricity Supplier Coordination Tariff, Schedule 3, paragraph 2, which states that the Reconciliation Component represents the difference between cumulative costs eligible for recovery and discount amounts for purchased receivables. This Imbalance shall be recorded in a balancing asset or liability segment and earn interest at the Company's most recent authorized distribution system rate of return.¹

Any questions concerning the Company's POR Supplier Discount Rate filing may be directed to Renae Graham at Renae.Graham@exeloncorp.com.

Sincerely,

/s/ Dennis P. Jamouneau

Dennis P. Jamouneau

Enclosure

cc: All Parties of Record

¹ "Electricity Supplier Coordination Tariff in the District of Columbia," *Electric Supplier –P.S.C. of D.C. No. 1*, Schedule 3(2), Sixth Revised Page No. 41 ("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.").

ATTACHMENT A

PEPCO CLEAN VERSION

ELECTRICITY SUPPLIER

COORDINATION TARIFF

IN THE

DISTRICT OF COLUMBIA



TABLE OF CONTENTS

1.0:	DEFINITIONS/EXPLANATIONS OF ABBREVIATIONS.....	1
2.0:	GENERAL TERMS AND CONDITIONS.....	5
2.1	Scope and Purpose	5
2.2	Electricity Supplier's Responsibilities to Customers.....	5
2.3	Agreement to Govern.....	5
2.4	Recourse to the Commission.....	5
2.5	FERC Jurisdiction	5
2.6	Electricity Supplier Obligations	5
2.7	Electricity Supplier and Company Obligations	6
2.8	Control Area Services and Obligations	6
2.9	Communications and Data Exchange.....	7
2.10	Record Retention.....	7
3.0:	UTILIZATION OF SCHEDULING COORDINATORS	8
3.1	Participation Through a Scheduling Coordinator	8
3.2	Designation of a Scheduling Coordinator.....	8
3.3	Change of Scheduling Coordinator	8
3.4	Load Scheduling Through a Scheduling Coordinator	8
3.5	Primary Obligations of Electricity Supplier	8
4.0:	COMMENCEMENT AND TERMINATION OF COORDINATION SERVICES	9
4.1	Application Process to Company	9
4.2	Commencement of Coordination Services.....	10
4.3	Notice of Electricity Supplier Discontinuance to the Company.....	10
4.4	Termination of Coordination Services.....	11
4.5	Effect of Termination.....	11
4.6	Survival of Obligations	11
5.0:	CREDITWORTHINESS.....	12
5.1	Purpose and Intent	12
5.2	Finding of Creditworthiness	12
5.3	Credit Amount.....	12
5.4	Change in Financial Status	12
5.5	Failure to Maintain Creditworthy Status	13
5.6	No Endorsement of Electricity Supplier.....	13

6.0:	NONCOMPLIANCE AND DEFAULT	14
6.1	Definition of Noncompliance	14
6.2	Events of Noncompliance	14
6.3	Cure and Default.....	14
7.0:	CUSTOMER ENROLLMENT AND INFORMATION PROCESS FLOW	15
7.1	Disclosure by Selected Electricity Supplier	15
7.2	Procedure to Formalize Selection of Electricity Supplier.....	15
7.3	Change of Electricity Supplier	16
7.4	Customer Rescission of Change	16
7.5	Customer Designation to Control.....	16
7.6	Switch from Electricity Supplier to Standard Offer Service	16
7.7	Customer Termination of Service at Existing Account.....	17
7.8	Supplier Discontinuance of Service	17
7.9	Effective Date of Discontinuance	17
7.10	Customer Number Change.....	17
7.11	Full Requirements Service Provision	17
8.0:	GENERAL LOAD OBLIGATION ALLOCATION METHODS	18
8.1	The Company's Role	18
8.2	Load Profiles.....	18
8.3	Use of Historical Load Information for Forecasting Customer Load Obligations.....	18
8.4	Rounding to Whole Megawatts	19
8.5	System Losses	19
8.6	Unaccounted for Energy/Residual Load	19
9.0:	LOAD RECONCILIATION, CAPACITY, AND TRANSMISSION ACCOUNTING PROCESSES	20
9.1	Capacity.....	20
9.2	Transmission	20
9.3	Load Forecasting	20
9.4	Load Scheduling	20
9.5	The Day-After Settlement	21
9.6	The "60-Day" Settlement/Consumption Energy Imbalance.....	22
9.7	Settlement Beyond "60 Days"	23
9.8	Settlement Calculations	23

10.0:	ACTIVE LOAD MANAGEMENT	24
10.1	ALM Operation.....	24
10.2	Ownership, Maintenance, and Operation of ALM Devices.....	24
11.0:	ELECTRICITY SUPPLIER CHARGES, BILLING AND PAYMENT	25
11.1	Charges for Electricity Supplier Services	25
11.2	Electricity Supplier Payment of Obligations to the Company	25
11.3	Billing for Electricity Supplier’s Obligations to Other Parties	26
12.0:	RETAIL CUSTOMER BILLING AND PAYMENT COLLECTION	27
12.1	Notification Of Retail Customer Billing Option.....	27
12.2	Electricity Company Consolidated Billing.....	27
12.3	Electricity Company Consolidated Billing and Payment Programs	28
12.4	Meter Reading Information for Billing Purposes.....	28
12.5	Bill Due Date	28
12.6	Electricity Company Consolidated Billing (Rate Ready Format)	29
12.7	Failure to Issue Consolidated Bill.....	29
12.8	Separate Billing.....	29
12.9	Payments from Consolidated Billing to Non-Billing Party.....	29
12.10	Payment Posting.....	29
12.11	Credit and Collections	29
12.12	Taxes	29
13.0:	COMPANY-SUPPLIED METERING SERVICES.....	30
13.1	Meters.....	30
13.2	Reading	30
13.3	Non-standard Metering	30
13.4	Special Meter Reading	30
13.5	Meter Testing.....	30
14.0:	SYSTEM OPERATION.....	31
14.1	Curtailment	31
14.2	Reasonable Efforts	31
14.3	PJM Requirements	31
15.0:	CONFIDENTIALITY OF INFORMATION.....	32
15.1	Generally	32
15.2	Customer-Specific Information.....	32

16.0: DISPUTE RESOLUTION..... 33
 16.1 Informal Resolution of Disputes 33
 16.2 Recourse 33

17.0: FORCE MAJEURE 34

18.0: REGULATORY AUTHORIZATIONS AND JURISDICTION..... 35
 18.1 Compliance with Applicable Legal Authorities 35
 18.2 Change in Applicable Legal Authorities 35

19.0: LIMITATION OF LIABILITY 36
 19.1 General Limitation of Liability 36
 19.2 Limitation of Liability for Service Interruptions and Variations 36
 19.3 Additional Limitations of Liability in Connection with Competitive
 Power Supply..... 36

20.0: MISCELLANEOUS PROVISIONS 37
 20.1 Notices..... 37
 20.2 No Prejudice of Rights 37

Schedule 1: Charges for Electricity Supplier Services 38
Schedule 2: District of Columbia Loss Factors 40
Schedule 3: District of Columbia Discount Rate for Purchase of Receivables 41-42

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 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.
 - 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 three 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 October 1, 2024, the Discount Rates are as follows:

<u>Rate Schedule</u>	<u>Discount Rate</u>
Residential – Schedules R and MMA including Rider RAD	7.7466%
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

ELECTRICITY SUPPLIER

COORDINATION TARIFF

IN THE

DISTRICT OF COLUMBIA



TABLE OF CONTENTS

1.0: DEFINITIONS/EXPLANATIONS OF ABBREVIATIONS..... 1

2.0: GENERAL TERMS AND CONDITIONS..... 5

 2.1 Scope and Purpose 5

 2.2 Electricity Supplier’s Responsibilities to Customers..... 5

 2.3 Agreement to Govern..... 5

 2.4 Recourse to the Commission..... 5

 2.5 FERC Jurisdiction 5

 2.6 Electricity Supplier Obligations 5

 2.7 Electricity Supplier and Company Obligations 6

 2.8 Control Area Services and Obligations 6

 2.9 Communications and Data Exchange..... 7

 2.10 Record Retention..... 7

3.0: UTILIZATION OF SCHEDULING COORDINATORS 8

 3.1 Participation Through a Scheduling Coordinator 8

 3.2 Designation of a Scheduling Coordinator..... 8

 3.3 Change of Scheduling Coordinator 8

 3.4 Load Scheduling Through a Scheduling Coordinator 8

 3.5 Primary Obligations of Electricity Supplier 8

4.0: COMMENCEMENT AND TERMINATION OF COORDINATION SERVICES 9

 4.1 Application Process to Company 9

 4.2 Commencement of Coordination Services..... 10

 4.3 Notice of Electricity Supplier Discontinuance to the Company..... 10

 4.4 Termination of Coordination Services..... 11

 4.5 Effect of Termination..... 11

 4.6 Survival of Obligations 11

5.0: CREDITWORTHINESS..... 12

 5.1 Purpose and Intent 12

 5.2 Finding of Creditworthiness 12

 5.3 Credit Amount..... 12

 5.4 Change in Financial Status 12

 5.5 Failure to Maintain Creditworthy Status 13

 5.6 No Endorsement of Electricity Supplier..... 13

6.0:	NONCOMPLIANCE AND DEFAULT	14
6.1	Definition of Noncompliance	14
6.2	Events of Noncompliance	14
6.3	Cure and Default.....	14
7.0:	CUSTOMER ENROLLMENT AND INFORMATION PROCESS FLOW	15
7.1	Disclosure by Selected Electricity Supplier	15
7.2	Procedure to Formalize Selection of Electricity Supplier.....	15
7.3	Change of Electricity Supplier	16
7.4	Customer Rescission of Change	16
7.5	Customer Designation to Control.....	16
7.6	Switch from Electricity Supplier to Standard Offer Service	16
7.7	Customer Termination of Service at Existing Account.....	17
7.8	Supplier Discontinuance of Service	17
7.9	Effective Date of Discontinuance	17
7.10	Customer Number Change.....	17
7.11	Full Requirements Service Provision	17
8.0:	GENERAL LOAD OBLIGATION ALLOCATION METHODS	18
8.1	The Company's Role	18
8.2	Load Profiles.....	18
8.3	Use of Historical Load Information for Forecasting Customer Load Obligations.....	18
8.4	Rounding to Whole Megawatts	19
8.5	System Losses	19
8.6	Unaccounted for Energy/Residual Load	19
9.0:	LOAD RECONCILIATION, CAPACITY, AND TRANSMISSION ACCOUNTING PROCESSES	20
9.1	Capacity.....	20
9.2	Transmission	20
9.3	Load Forecasting	20
9.4	Load Scheduling	20
9.5	The Day-After Settlement	21
9.6	The "60-Day" Settlement/Consumption Energy Imbalance.....	22
9.7	Settlement Beyond "60 Days"	23
9.8	Settlement Calculations	23

10.0:	ACTIVE LOAD MANAGEMENT	24
10.1	ALM Operation.....	24
10.2	Ownership, Maintenance, and Operation of ALM Devices.....	24
11.0:	ELECTRICITY SUPPLIER CHARGES, BILLING AND PAYMENT	25
11.1	Charges for Electricity Supplier Services	25
11.2	Electricity Supplier Payment of Obligations to the Company	25
11.3	Billing for Electricity Supplier's Obligations to Other Parties	26
12.0:	RETAIL CUSTOMER BILLING AND PAYMENT COLLECTION	27
12.1	Notification Of Retail Customer Billing Option.....	27
12.2	Electricity Company Consolidated Billing.....	27
12.3	Electricity Company Consolidated Billing and Payment Programs	28
12.4	Meter Reading Information for Billing Purposes.....	28
12.5	Bill Due Date	28
12.6	Electricity Company Consolidated Billing (Rate Ready Format)	29
12.7	Failure to Issue Consolidated Bill.....	29
12.8	Separate Billing.....	29
12.9	Payments from Consolidated Billing to Non-Billing Party.....	29
12.10	Payment Posting.....	29
12.11	Credit and Collections	29
12.12	Taxes	29
13.0:	COMPANY-SUPPLIED METERING SERVICES.....	30
13.1	Meters.....	30
13.2	Reading	30
13.3	Non-standard Metering	30
13.4	Special Meter Reading	30
13.5	Meter Testing.....	30
14.0:	SYSTEM OPERATION.....	31
14.1	Curtailment	31
14.2	Reasonable Efforts	31
14.3	PJM Requirements	31
15.0:	CONFIDENTIALITY OF INFORMATION.....	32
15.1	Generally	32
15.2	Customer-Specific Information.....	32

DC

16.0: DISPUTE RESOLUTION..... 33

 16.1 Informal Resolution of Disputes 33

 16.2 Recourse 33

17.0: FORCE MAJEURE 34

18.0: REGULATORY AUTHORIZATIONS AND JURISDICTION..... 35

 18.1 Compliance with Applicable Legal Authorities 35

 18.2 Change in Applicable Legal Authorities 35

19.0: LIMITATION OF LIABILITY 36

 19.1 General Limitation of Liability 36

 19.2 Limitation of Liability for Service Interruptions and Variations 36

 19.3 Additional Limitations of Liability in Connection with Competitive
 Power Supply..... 36

20.0: MISCELLANEOUS PROVISIONS 37

 20.1 Notices..... 37

 20.2 No Prejudice of Rights 37

Schedule 1: Charges for Electricity Supplier Services 38

Schedule 2: District of Columbia Loss Factors 40

Schedule 3: District of Columbia Discount Rate for Purchase of Receivables 41-42

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.
 - 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~~ three 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~~ October 1, 2024, the Discount Rates are as follows:

<u>Rate Schedule</u>	<u>Discount Rate</u>
Residential – Schedules R and MMA including Rider RAD	3.9807% <u>7.7466%</u>
Small Comm. – Schedules GS ND, T, SL, OL LED, TS and TN	0.7765% <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 Schedules R & MMA	SMALL COMMERCIAL Schedules GS-LV-ND, T, SL, TS, TN & OL-LED	LARGE COMMERCIAL Schedules GS-LV, GS-3A, MGT-LV, GT-LV, GT-3A, GT-3B & RT
Write-Offs (1)	3.8933%	0.7208%	0.0416%
Late Payment Revenues (1)	0.7227%	0.7383%	0.7284%
Net Write-Offs (Write-Offs plus Reinstatements, minus Late Payment Revenues)	3.1706%	-0.0175%	-0.6868%
Interest Factor (1)	0.1312%	-0.0073%	-0.0258%
Reconciliation Factor (1)	4.4448%	-1.3028%	-2.1184%
Discount	7.7466%	-1.3276%	-2.8310%
Discount (zeroed)	7.7466%	0.0000%	0.0000%
Payment Factor	92.2534%	100.0000%	100.0000%

(1) For the Residential Bad Debt Expense and Late Fees Revenues, the Company is using Calendar Year 2022 as directed by Commission Order No. 22259.

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
Electric Revenues Billed													
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ 32,313,647.32	\$ 28,674,397.35	\$ 30,310,063.90	\$ 27,805,472.01	\$ 29,994,845.79	\$ 34,117,564.02	\$ 36,016,729.90	\$ 42,020,742.29	\$ 36,047,273.53	\$ 33,569,725.10	\$ 31,000,836.69	\$ 30,267,512.35	\$ 392,138,810.25
POR Discount													
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ -	\$ (262,805.40)	\$ (210,701.11)	\$ (170,881.35)	\$ (132,301.76)	\$ (159,962.14)	\$ (936,651.76)						
Net Electric Revenues Billed													
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ 32,313,647.32	\$ 28,674,397.35	\$ 30,310,063.90	\$ 27,805,472.01	\$ 29,994,845.79	\$ 34,117,564.02	\$ 36,016,729.90	\$ 41,757,936.89	\$ 35,836,572.42	\$ 33,398,843.75	\$ 30,868,534.93	\$ 30,107,550.21	\$ 391,202,158.49

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
Late Fee Revenues (2)													
Residential - R & MMA	\$ (2,441.89)	\$ -	\$ (19,808.40)	\$ (11,920.44)	\$ (2,112.68)	\$ (12,205.60)	\$ (27,461.64)	\$ (777.88)	\$ (43,374.78)	\$ (41,432.49)	\$ (38,818.44)	\$ (181,273.67)	\$ (381,627.91)
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ (205,762.17)	\$ (224,407.81)	\$ (221,968.66)	\$ (165,966.17)	\$ (222,979.24)	\$ (174,670.95)	\$ (247,733.85)	\$ (263,024.38)	\$ (268,259.91)	\$ (256,224.11)	\$ (206,561.81)	\$ (397,403.39)	\$ (2,854,962.45)
Write Offs (2)													
Residential - R & MMA	\$ 915,210.82	\$ 22,603.67	\$ 9,246.29	\$ 160,290.48	\$ 60,587.50	\$ 8,409.81	\$ 15,208.96	\$ 212,911.11	\$ 48,595.00	\$ 138,586.89	\$ 140,909.29	\$ 323,389.18	\$ 2,055,949.00
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ 938,510.10	\$ 41,459.21	\$ 73,066.90	\$ 190,796.45	\$ 60,898.19	\$ 7,458.61	\$ 70,889.04	\$ 226,634.08	\$ 62,134.49	\$ 158,821.98	\$ 148,177.35	\$ 326,290.38	\$ 2,305,136.78
Over / (Under) Collections													
Residential - R & MMA	\$ (912,768.93)	\$ (22,603.67)	\$ 10,562.11	\$ (148,370.04)	\$ (58,474.82)	\$ 3,795.79	\$ 12,252.68	\$ 40,009.60	\$ 194,786.30	\$ 59,954.78	\$ 20,681.82	\$ 7,453.40	\$ (792,720.98)
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ (732,747.93)	\$ 182,948.60	\$ 148,901.76	\$ (24,830.28)	\$ 162,081.05	\$ 167,212.34	\$ 176,844.81	\$ 299,195.70	\$ 416,826.53	\$ 268,283.48	\$ 190,686.22	\$ 231,075.15	\$ 1,486,477.43

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
Cumulative Over / (Under) Collections													
Residential - R & MMA	\$ (912,768.93)	\$ (935,372.60)	\$ (924,810.49)	\$ (1,073,180.53)	\$ (1,131,655.35)	\$ (1,127,859.56)	\$ (1,115,606.88)	\$ (1,075,597.28)	\$ (880,810.98)	\$ (820,856.20)	\$ (800,174.38)	\$ (792,720.98)	
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	-	-	-	-	-	-	-	-	-	-	-	-	
Total	\$ (732,747.93)	\$ (549,799.33)	\$ (400,897.57)	\$ (425,727.85)	\$ (263,646.80)	\$ (96,434.46)	\$ 80,410.35	\$ 379,606.05	\$ 796,432.58	\$ 1,064,716.06	\$ 1,255,402.28	\$ 1,486,477.43	
Interest (1)													
Residential - R & MMA	\$ (5,453.79)	\$ (5,588.85)	\$ (5,525.74)	\$ (6,412.25)	\$ (6,761.64)	\$ (6,738.96)	\$ (6,665.75)	\$ (6,426.69)	\$ (5,262.85)	\$ (4,904.62)	\$ (4,781.04)	\$ (4,736.51)	\$ (69,258.69)
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	-	-	-	-	-	-	-	-	-	-	-	-	-
Total	\$ (4,378.16)	\$ (3,285.05)	\$ (2,395.36)	\$ (2,543.72)	\$ (1,575.29)	\$ (576.20)	\$ 480.45	\$ 2,268.15	\$ 4,758.68	\$ 6,361.68	\$ 7,501.03	\$ 8,881.70	\$ 15,497.91

(1) The allowed Rate of Return per F.C. No. 1156 is: 7.17% effective from July 2021.
 (2) For the projection of Residential Bad Debt Expense and Late Fees Revenues, the Company is using Calendar Year 2022 as the proxy of ongoing costs as directed by Commission Order No. 22259.

ATTACHMENT D

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

	1	RESIDENTIAL - Schedules R & MMA	SMALL COMMERCIAL - Schedules GS-LV-ND, T, SL, TS, TN and OL- LED	LARGE COMMERCIAL - Schedules GS-LV, GS- 3A, MGT-LV, GT-LV, GT-3A, GT-3B and RT	MARKET PRICE SERVICE (MPS) - Schedules GS-LV-ND, GS-LV, GS-3A, MGT- LV, GT-LV, GT-3A, T, 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)		2,055,949.00	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 (1)		381,627.91	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 (1)		(69,258.69)	1,167.88	83,588.72	-
5 Cumulative Over/(Under) Collection	(1-2+3+4)	(2,337,043.72)	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)	\$ (2,347,150.18)	\$ 207,462.39	\$ 6,850,909.70	\$ 11,078.75
8 Interest		\$ (69,258.69)	\$ 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)	-4.4448%	1.3028%	2.1184%	0.0000%
11 Interest Factor	(8/9)	-0.1312%	0.0073%	0.0258%	0.0000%

(1) As a result of using Year 8 Bad Debt Expenses and Late Fees Revenues to replace Year 9 Bad Debt Expenses and Late Fees Revenues, Pepco will defer the following amounts representing the incremental amount between 2023 data and 2022 data to be incorporated in the Reconciliation Factor in a future year(s):

Write-Offs	\$ 1,849,172.90
Late Fee Revenues	\$ 7,049.99
Interest Expense/Revenue	\$ (38,536.00)
Net under collected amount	\$ (1,880,658.91)

CERTIFICATE OF SERVICE

I hereby certify that a true copy of Pepco's POR Supplier Discount Rate filing was served on the parties of record in Formal Case No. PEPPOR by electronic mail this 6th day of September 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
bwestbrook@psc.dc.gov

Sandra Mattavous Frye, Esq.
People's Counsel
Office of the People's Counsel
655 15th Street NW, Suite 200
Washington, DC 20005
smfrye@opc-dc.gov

Craig D. Goodman
National Energy Marketers Association
3333 K Street NW Ste 110
Washington, DC 20007
cgoodman@energymarketers.com

Christopher Lipscombe, Esq.
General Counsel
Public Service Commission Of the
District of Columbia
1325 G Street N.W. Suite 800
Washington, DC 20005
clipscombe@psc.dc.gov

Anthony Cusati, III
Interstate Gas Supply, Inc.
1379 Butter Churn Drive
Herndon, VA 20170
tcusati@igsenergy.com

Brian R. Greene, Esq.
GreeneHurlocker, PLC
1807 Libbie Avenue, Suite 102
Richmond, VA 23226
bgreene@greenehurlocker.com

Telemac N. Chryssikos, Esq.
Washington Gas Energy Services, Inc.
101 Constitution Avenue NW
Washington, DC 20080
macchryssikos@wges.com

Melanie Santiago-Mosier
Washington Gas Energy Services, Inc.
13865 Sunrise Valley Dr., Suite 200
Herndon, VA 20171
mmosier@wges.com

/s/ Dennis P. Jamouneau

Dennis P. Jamouneau