

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA  
1325 G STREET, N.W., SUITE 800  
WASHINGTON, D.C. 20005**

**December 13, 2024**

**FORMAL CASE NO. 1182, IN THE MATTER OF THE INVESTIGATION INTO THE  
IMPLEMENTATION OF INTEGRATED DISTRIBUTION SYSTEM PLANNING FOR  
ELECTRIC UTILITIES,**

**INQUIRY OF COMMISSIONER RICHARD BEVERLY**

The Commission has opened a formal case on integrated distribution planning for Pepco and issued a Notice of Inquiry. As part of this process, I invite interested stakeholders to inform me in particular, and the Commission as they deem appropriate, on what data and information we need to collect from Pepco and how we should undertake this process to ensure a transparent and successful outcome. To that end, I have the following questions:

Overall IDP Process:

1. Should the Commission adopt a rulemaking to establish the process, contents, and evaluation criteria for the integrated distribution plan?
2. Should the Commission adopt 5-year time horizons for the IDP to align with the 5-year GHG reduction goals in the Climate Commitment Act?

Distribution System Description:

3. Should the Commission require Pepco to provide the miles of overhead and unground wires, categorized by voltage?
4. Should the Commission require Pepco to provide the number and capacity of distribution substations, noting the number that contain SF<sub>6</sub>?
5. Should the Commission require Pepco to provide the number and capacity of distribution transformers, noting how many contain PCBs?
6. Should the Commission require Pepco to provide detailed information about monitoring and measurement capabilities? Should this include the percentage of substations and feeders for which Pepco has supervisory control and data acquisition (SCADA) capabilities?
7. Should the Commission require Pepco to provide the annual coincident and non-coincident peak demand and timing by substation zone?
8. Should the Commission require Pepco to provide the annual coincident and non-coincident peak demand and timing by feeder?
9. Should the Commission require Pepco to provide the seasonal coincident and non-coincident peak demand and timing by substation zone?
10. Should the Commission require Pepco to provide the seasonal coincident and non-coincident peak demand and timing by feeder?

11. Should the Commission require Pepco to provide the known distribution system line losses (and estimates where actuals are unavailable)?
12. Should the Commission require Pepco to provide the number, type, and capacity of DER installed on the system by substation zone?
13. Should the Commission require Pepco to provide the number, type, and capacity of DER installed on the system by feeder?
14. Should the Commission require Pepco to provide the number, capacity, and locations of public and private (where data is available) EV-charging stations?
15. Should the Commission require Pepco to provide the number, capabilities, and locations of islandable microgrids?
16. Should the Commission require Pepco to provide the last three years of investment in demand-side management (in dollars) and results measured in decreased coincident peak demand?
17. Should the Commission require Pepco to provide the last three years of distribution system investments (in dollars) categorized by the reason for the investment (e.g., replace failing equipment, increase capacity, etc.)?
18. What other data or information should the Commission require about the distribution system (i.e. GIS mapping)?

Planned Retirements:

19. Should the Commission require Pepco to provide any known or expected future asset changes on the distribution system and the reason for the change (e.g. planned retirements of existing assets, existing infrastructure projects, deployments of SCADA or other monitoring technologies)?
20. What other data or information should be included regarding planned retirements?

Load and DER Forecasting:

21. Should the Commission require Pepco to provide load and DER forecasts in both MW and MWh, with significant spatial and temporal granularity (i.e. broken down by feeder, substation zone, and season)?
22. Should load, DER, and net load forecasts include the following outputs for each: annual systemwide peak demand and timing; annual coincident and non-coincident peak demand and timing by substation zone; annual coincident and non-coincident peak demand and timing by feeder; seasonal coincident and non-coincident peak demand by substation zone; and seasonal coincident and non-coincident peak demand by feeder?
23. Should the Commission require Pepco to provide probabilistic DER forecasting by DER type? What scenarios should the Commission consider requiring? Should the Commission require Pepco to model solar carve-out compliance?
24. Should the Commission require Pepco to provide probabilistic load forecasts that include updated energy codes, BEPS, and electrification scenarios?

25. What else should the Commission require in the forecasts?

Hosting Capacity Analysis:

26. While this will certainly overlap with the interconnection investigation in *Formal Case No. 1050*, what methodology should the Commission consider adopting for Pepco's HCA to facilitate integrated distribution planning? Should the HCA apply to multiple DER types? How often should it be updated?

Grid Needs Assessment:

27. Should the Commission require Pepco to provide its methodology and calculations for SAIDI, SAIFI, CAIDI, and CEMI-3?
28. Should the Commission require Pepco to identify any condition or consideration that may limit the capability of the distribution system component to serve load?
29. Should the Commission require Pepco to identify needed infrastructure replacements due to: breakage or damage; age-related degradation; increase in served electrical load; or significant advances in new equipment?
30. What other data or information should the Commission require in the grid needs assessment?

Prioritization of Grid Needs:

31. Should the Commission require Pepco to provide criteria, methodology, and outputs from a ranking exercise of grid needs resulting in a transparent explanation and categorization of the needs that require immediate action, near-term action, or longer-term action?
32. What other data or information should the Commission require as part of this prioritization?

Evaluation of Options:

33. Should the Commission require Pepco to consider NWAs, DER, demand-side management, and rate design on equal footing with traditional options?
34. Should the Commission require Pepco to describe the assumed capabilities and costs of each option category considered?
35. Should the Commission require Pepco to undertake DER potential studies?
36. Should the Commission require Pepco to solicit data or bids from vendors to accurately characterize the availability, costs, and capabilities of DER?
37. Should the Commission require Pepco to identify preferred solutions according to the Commission's forthcoming BCA framework?
38. What else should be included in the evaluation?

Action Plan:

39. Should the Commission require Pepco to present an Action Plan for approval within the IDP that includes: plans encouraging the deployment of DERs, including contracting through NWAs; plans for permitting, constructing, preparing required reports and other significant

activities where replacement, upgrades, or expansion of utility infrastructure has been identified as the best option; plans for the retirement or retrofit of existing major equipment; a timeline that establishes the sequence of events for each action; and plans to solicit competitive bids?

40. What else should an Action Plan require?

Additional:

41. What other information and/or processes do stakeholders believe is necessary for the IDP to align with the solar carve-out of the RPS and Climate Commitment Act? Are there any other utility commission IDPs that stakeholders recommend as best practice?

This inquiry is issued pursuant to my independent authority under D.C. Code §34-802. It is not an inquiry of the entire Commission and, although it may help inform stakeholders in addressing the Commission's NOI, answering my inquiry is entirely voluntary.