

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

**February 7, 2025**

**FORMAL CASE NO. 1017, IN THE MATTER OF THE DEVELOPMENT AND DESIGNATION OF STANDARD OFFER SERVICE IN THE DISTRICT OF COLUMBIA,**

and

**FORMAL CASE NO. 1183, IN THE MATTER OF THE INVESTIGATION INTO THE IMPACT OF THE PJM CAPACITY AUCTION AND THE ESTABLISHMENT OF THE PJM CAPACITY AUCTION TASK FORCE**

**LETTER OF COMMISSIONER BEVERLY**

I heard multiple public witnesses at the Commission’s oversight hearing on February 5, 2025 request an increase in the portion of Standard Offer Service (“SOS”) that is procured through renewable power purchase agreements (“PPAs”). As I stated in a concurring statement to Order No. 21977: “I think it’s time to revisit raising the 5% cap or reconsider giving Pepco more flexibility to exceed the 5% cap so that we don’t inadvertently frustrate Pepco’s ability to attract bidders while simultaneously undermining the City’s climate plans.”

DOEE provided analysis performed by its contractor, Center for Renewables Integration, in this case on November 9, 2018.<sup>1</sup> According to that analysis, the percentage of a renewable PPA could be as high as 70-90% while also resulting in lower wholesale prices for District customers. I recognize that with the passage of time there have been market changes to PJM that could impact that analysis. I request that DOEE advise me whether there are plans to update any modeling or whether DOEE still supports a 70-90% renewable PPA, albeit with the level of flexibility in procurement that DOEE also requested. I also would like to know whether DOEE is updating this recommendation as part of its second iteration of the Clean Energy DC Plan.

OPC recommended increasing the PPA amount by 5% annually.<sup>2</sup> I request that OPC also provide an update as to whether that is still OPC’s proposal, and whether OPC plans to undertake additional analysis or modeling.

If any other party has analysis or modeling to demonstrate the appropriate size of the renewable PPA percentage of SOS, I also welcome those analyses.

My inquiry is issued pursuant to my independent authority under D.C. Code §34-802 and is not intended to represent a communication of the full Commission.

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<sup>1</sup> *Formal Case No. 1017*, Comments by the Department of Energy and Environment on Behalf of the District of Columbia Government. Filed November 9, 2018.

<sup>2</sup> *Formal Case No. 1017*, Office of the People’s Counsel for the District of Columbia’s Initial Comments Pursuant to Order No. 19431. Filed November 9, 2018.