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Technical Conference

Formal Case No. 1050

In the Matter of the Investigation of the
Implementation of Interconnection Standards in the
District of Columbia

Formal Case No. RM40-2022-01

In the Matter of 15 DCMR Chapter 40-District of
Columbia Small Generator Interconnection Rules

Formal Case No. ET2023-02

In the Matter of the Petition of the Potomac Electric
Power Company to Approve a Tariff Change for 20 KW And
Below Residential Solar NEM Interconnections

Moderated by Brian O. Edmonds

Tuesday, April 1, 2025

10:00 a.m.

Job No. CS7282488

1 Public Service Commission of the District of Columbia

2 1325 G Street NW, Suite 800

3 Washington, DC 20005

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8 Reported by: Samuel Pachon

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1 A P P E A R A N C E S

2 List of Attendees:

3 Yohannes K. G. Mariam, Ph.D., OPC

4 Thomas Bartholemew, DOEE

5 Brian Caldwell, DCG

6 Peter Damrosch, DOEE

7 Dave Golembeski, Interstate Renewable Energy Council

8 Eric Walklace, Chesapeake Solar & Storage Association

9 (Outside Counsel, GreeneHurlocker, PLC)

10 Nicole Rentz, New Columbia Solar / CHESSA

11 Albert LaFrance, Solar Solution

12 Knia Tanner, OPC

13 Taylor Beckham, PEPCO

14 Dennis Jamouneau, PEPCO

15 Kunle Adeyemo, PEPCO

16 Kimberly Curry, PEPCO

17 Julianny Tate, PEPCO

18 Rosemary Jojnic, PEPCO

19 Diane Umeaku, PEPCO

20 Laura Ward, DOEE

21 Brian Lydic, Interstate Renewable Energy Council

22 Brian Alexander, CleanGrid Advisors

1 A P P E A R A N C E S (Cont'd)

2 List of Attendees:

3 Shalom Flank, Ph.D., Microgrid Architect

4 Brian O. Edmonds, Public Service Commission District

5 of Columbia Attorney Advisor

6 Harry Warren, Center for Renewables Integration

7 James Clarke, Solar for All Portfolio Manager, DCSEU

8 Josh Wink, Solar for All Program Manager, DCSEU

9 Kevin Mara, GDS Associates, Presenting OPC

10 Katherine Wyszowski, Sunnova Energy Corporation

11 Aleksandra George, OPC

12 Adam Carlesco, OPC

13 Pamela Nelson, OPC

14 Jason Cumberbatch, OPC

15 Linda Gray, OPC Consultant

16 Tim Oberleiton, Earthjustice

17 Brian Edmonds, PSC, Attorney Advisor

18 Dilip Kommineni, PSC, Chief of Climate Action

19 Alex Vermoer, PEPCO

20 Roger Fujihara, PSC, Senior Electricity Economist

21

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1 P R O C E E D I N G S

2 MR. EDMONDS: Public Service
3 Commission. I'm Brian Edmonds from the Office of the
4 General Counsel.

5 And we have a lot of folks joining us
6 online. But I do want to go around the room to see
7 who is joining us here in the commission hearing room.

8 I'm going to start first with my
9 colleague from the Commission's Office of Technical
10 and Regulatory Analysis or OTRA. And then we'll go
11 around the room in that fashion.

12 So I'll start with you.

13 MR. KOMMINENI: Dilip Kommineni, Chief
14 of Climate Action.

15 MS. UMEAKU: Good morning, Diane Umeaku
16 with PEPCO, Manager for DER Engineering.

17 MR. VERMOER: Good morning. Alex
18 Vermoer with PEPCO, DER Interconnection.

19 MR. ADEYEMO: Kunle Adeyemo, PEPCO,
20 Office of Assistant Attorney General.

21 MS. BECKHAM: Good morning, everyone.
22 Taylor Beckham, Assistant General Counsel for PEPCO.

1 MR. DAMROSCH: Peter Damrosch, Energy
2 Policy Advisor with the Department of Energy and the
3 Environment.

4 MR. GOLEMBESKI: Dave Golembeski,
5 Senior Program Manager with IREC.

6 MS. RENTZ: Nicole Rentz with the
7 Chesapeake Solar and Storage Association.

8 MR. EDMONDS: Nicole, can you hand them
9 out?

10 MR. LAFRANCE: Good morning. Albert
11 LaFrance, that's L-A-F-R-A-N-C-E, with Solar Solution.

12 MR. EDMONDS: Great, thank you. Well,
13 welcome all to the Technical Conference.

14 Couple things I want to highlight real
15 quick, administrative matters with regard to the
16 minutes for today's meeting.

17 This month, that responsibility belongs
18 to the DC Government. So DC Government will be
19 preparing the minutes circulating a draft of the
20 minutes within ten days from today's meeting.

21 And folks will have five days
22 thereafter to suggest any edits. And then the final

1 draft will be -- the final version of the minutes will
2 be filed 20 days after today's meeting.

3 PEPCO will be responsible for the
4 meeting minutes in May. And then that responsibility
5 will go to OPC in June. So District Government,
6 April; PEPCO in May; and then OPC in June.

7 A couple other things. There is a
8 recording for the educational session that we had
9 presented by Grace Relf at the Lawrence Berkeley
10 National Lab that was held on the 20th of March.

11 And if you'd like to listen to that
12 recording, it should be available in the box folder
13 for everyone to look at. And I think the presentation
14 is there as well.

15 Finally, there is an outstanding notice
16 of proposed rulemaking or NPRM that the commission
17 published in the DC register on March the 14th.

18 As I had indicated to you, all this
19 NPRM was coming. Please make sure that you -- if you
20 have not seen it, that you go to the formal case 1050
21 or to the rulemaking 40-2024 for that proposed
22 rulemaking.

1 It's actually the second proposed
2 rulemaking. And it discusses some of the items that
3 we have -- we are discussing or have been kind of
4 talking about in this Technical Conference.

5 But I want to make sure everyone knows
6 that you must file -- if you intend to file comments,
7 you must file written comments within 30 days of the
8 publication. I believe that's around April the 14th.

9 That being said, we have two
10 presentations today. We are going to receive a
11 presentation from the staff on the Interconnection
12 Flow Process. That'll be about a 30 minute
13 presentation.

14 And then we'll allow 15 minutes for
15 questions and answers. I'll be monitoring the chat
16 and Teams. So if you have a question, just raise your
17 hand using that function.

18 And we'll take a break thereafter. And
19 we'll come back and listen to a presentation, strawman
20 proposal rather, a joint strawman proposal by the
21 District Government -- presented by the District
22 Government. Again, 30 minutes for that and 15 minutes

1 for questions and answers.

2 We're going to hold all questions until
3 the presentations have concluded 'cause we've had
4 challenges with people jumping in with questions. And
5 we never get finished with the presentation.

6 So we're going to allow the presenters
7 to complete their presentation before we have
8 questions and answers.

9 And then we will discuss other matters
10 including future topics and speakers that we will
11 have.

12 All right, that being all the
13 introductory matters, I'm going to turn it over to my
14 colleague, Dilip, from OTRA.

15 MR. KOMMINENI: Good morning, all. In
16 the past few sessions, we have been seeing different
17 parties including PEPCO present on the process and the
18 different stages of the process for the
19 Interconnection.

20 We here -- staff decided that it'll be
21 good for us to present the rulemaking 40 process.
22 Again, the intent of this presentation is to identify

1 any pain points and any opportunities to revise the
2 rules.

3 We also understand the process which we
4 are presenting today might be a bit different. So we
5 would like to hear from you guys on how it differs and
6 if there's any, you know, better opportunities to
7 improve the process.

8 With that said, we will be focusing on
9 the different levels.

10 The clicker isn't working. Perfect.

11 So I gave the background. With that
12 said, most of you know there are four levels of
13 Interconnection.

14 Level one is limited to small projects
15 under 20 kilowatts. And level two would be between 20
16 kilowatts to 5 megawatts including CREFs.

17 Level three would be between 5
18 megawatts and 20 megawatts and do not export to our
19 grid.

20 And the last one is the level four,
21 which is 5 megawatts to 20 megawatts exporting to the
22 grid.

1 With that said, we will be focusing on
2 level one and level two today. Just going -- walking
3 you through the process of what is in the rulemaking.
4 And if we -- if parties require, we could also present
5 level four if needed.

6 That said, any project within 20
7 kilowatts or less goes through level one process. And
8 here you notice that the customer initiates the
9 process. They provide the part one of the
10 Interconnection application to the EDC.

11 From then the EDC has five business
12 days. Like you see, there's five business days. And
13 a decision is made, whether the application is
14 complete, which means they have all the information to
15 proceed forward, or if it's incomplete.

16 So if it's incomplete, I think the EDC
17 provides a description of why the application is
18 incomplete and provides that back to the customer.

19 If the application is complete, then
20 immediately that application would be put in the queue
21 position.

22 From then the EDC has five business

1 days to do its screening and provide the results. So
2 if the application goes through the screening, then an
3 ATI would be provided.

4 So from the rulemaking, our
5 understanding is the ATI is ten business days from the
6 beginning to when they receive the ATI if everything
7 is in complete status.

8 Once the ATI is received or issued by
9 the EDC, the EDC has three business days to put
10 together an agreement, the Interconnection agreement.
11 So that's first part of the process.

12 Moving on, once the ATI is issued,
13 there is a time -- there. So it's either within six
14 months of receiving an ATI or six months from the
15 completion of any upgrades, whichever is later. So
16 this step depends on both the customer and the EDC to
17 move forward.

18 The customer would provide the part two
19 of the application to the EDC. Once the EDC receives
20 the application, it has 10 business days or a
21 mutually-agreed time to do the witness test.

22 So from the witness test there could be

1 three different paths. One, if the witness test
2 fails, the EDC would provide a description of why it
3 failed and can redo the test based on the, you know,
4 mutually-agreed time, again.

5 If the EDC doesn't show up on the
6 mutually-agreed time or within the ten business days
7 to do the test, then the test is considered to be
8 waived.

9 Other path would be if the test passes
10 from the witness test date, 20 days -- business days,
11 the ATO will be issued by the EDC.

12 So that's the overall process. And our
13 understanding is, for the ATO, which is another
14 critical point, the turnaround time is 20 business
15 days from the witness test day.

16 Moving down the process, there might be
17 situations where the EDC decides the system cannot be
18 integrated safely, reliably, and with standards.

19 In those cases, the EDC will provide a
20 written explanation of why it fails to meet the
21 standards.

22 In that case, either the process can

1 move into a supplemental review and to a level two; or
2 it could -- you know, if the system is big, it can
3 directly move to level four. So that's the process
4 which is outlined in the rulemaking for level one.

5 And I do have a few questions for
6 PEPCO. But I'll revisit once I complete the level
7 two.

8 Again, the level two two is critical
9 because this is where I see a lot of opportunity to
10 improve, and a lot of parties have expressed their
11 pain points.

12 So let's go through the level two here,
13 which is similar. I just want to bring up level one,
14 that way you guys get familiar with the process.

15 So with the level two, it's for any
16 customers between 20 kilowatts to 5 megawatts. And
17 the process is a bit tedious.

18 The start -- it starts with the
19 customer. The customer provides the part one of the
20 Interconnection request.

21 And the EDC has, again, similarly, five
22 business days to inform the customer if the

1 application is complete or incomplete.

2 If it's incomplete, the EDC provides a
3 written explanation of what is missing in the
4 application.

5 And customer has ten business days to
6 review and provide the missing information. If the
7 customer provides the requested information, the EDC
8 has three business days to deem it complete or
9 incomplete. If it's further -- it's incomplete, then
10 the EDC deems the request to be withdrawn.

11 That's the left side part of the
12 process flow in the chart. And moving on to the right
13 side, which is the complete, if the EDC reviews the
14 application and thinks it's -- all the requested
15 information is available, then it's deemed complete;
16 and it assigns the queue position.

17 From there, we have different paths.
18 If a system upgrade or modification is required, the
19 rulemaking points out to 4,005.6, which we will be
20 looking at in slide 23 or the next slides.

21 We would -- if the application is
22 complete, the first thing is within 15 days they're

1 going to screen for level two. If the level two
2 passes, an ATI is issued.

3 So the commission understands that the
4 ATI for a level two is 20 business days, which is five
5 days for completeness and 15 days for the screening.

6 Once the ATI is issued, I think an
7 agreement is given -- issued within three business
8 days.

9 Moving on to the centerpiece of the
10 slide here, if in case a system upgrade is needed,
11 which is -- can take two different paths.

12 One is the EDC would provide a written
13 explanation why the system doesn't meet the
14 requirements. Or they could have a scoping meeting
15 where they could discuss the issues and review the
16 system upgrades required.

17 Moving on to the next slide here, and
18 we're going to pick up the process from the ATI. If
19 an ATI was issued, then within 24 months from
20 receiving an ATI or six months from completion of
21 distribution system upgrades, whichever is later, the
22 customer would be submitting the part two of the

1 application.

2 Once a part two of the application is
3 received within ten days of the mutually-agreed time
4 between the customer and the EDC, a witness test would
5 be scheduled.

6 And we have a similar process here. If
7 the witness test fails, the EDC would provide a
8 description of why it failed and will be willing to
9 do -- redo the test based on the customer's
10 requirement.

11 If the test is not done within the ten
12 business days, then -- or the agreed time, then the
13 test is deemed to be waived.

14 The other scenario would be if the test
15 is conducted and everything passes, then the EDC would
16 issue the ATO.

17 And in this case we do recognize that
18 there is no time frame for the ATO compared to level
19 one.

20 Moving on, going back to that 5.6
21 section, which was listed in level two, if a system
22 modification is required and only Interconnection

1 facility needs to be interconnected, then the EDC will
2 provide a non-binding, good-faith cost estimate,
3 construction schedule, and an ATI within 15 business
4 days.

5 If a facility upgrade is required and a
6 system upgrade is also required, then the EDC will
7 provide -- it'll take ten -- thirty business days to
8 provide the good-faith estimate construction schedule
9 and the ATI.

10 Or if the system is complicated, then
11 it's going to move into this -- the distribution
12 upgrade or the facility study. Again, we have a
13 separate topic for facility study itself.

14 And there is another scenario where in
15 5.7 we see if the system cannot be integrated safely,
16 reliably, and according to the standards, similarly to
17 level one, a detailed explanation would be provided to
18 the customer.

19 And from there, either a supplemental
20 review would be performed or level four, a review
21 would be completed.

22 Pretty much, that concludes the

1 overview of level one and level two.

2 I do have a few questions to PEPCO. So
3 first question I have is, when the customer
4 application is incomplete, do they have a timeline to
5 get back, like which we see in level two? Or would
6 they go back to the queue again?

7 MR. VERMOER: Yeah, for level ones, the
8 question on level ones, unlike level two, for
9 incomplete, there's no timeline for the customer to
10 respond.

11 They have to -- once they're told about
12 what they need to fix, then they have to resubmit and
13 restart again.

14 MR. KOMMINENI: So they'll be
15 restarting the process again?

16 MR. VERMOER: Oh, I'm sorry. Yes, Alex
17 Vermoer with PEPCO, ConneDER Interconnection. Sorry.

18 MR. KOMMINENI: Okay, that's good to
19 know.

20 And can PEPCO confirm if the ATI, the
21 number of business days, is ten and are in sync with
22 what we have in the presentation: five business days

1 to review the completeness and five business days to
2 issue the ATI?

3 MR. VERMOER: Yes. Alex Vermoer again
4 with PEPCO. Yes, that's how PEPCO understands the
5 number for completeness and time for the technical
6 review for level one.

7 MR. KOMMINENI: Level one. Okay, thank
8 you.

9 The next question we have in level one
10 is we do see after the ATI is issued, there is a
11 waiting period of six months of receiving the ATI or
12 six months from the completion of any upgrades,
13 whichever is later.

14 Can you elaborate on that? Does that
15 mean the customer has some waiting period as well as
16 the EDC has some waiting period in the flowchart, the
17 first step whereafter receiving the ATI?

18 MS. BECKHAM: We're on slide 6;
19 correct?

20 MR. KOMMINENI: Yes.

21 MS. BECKHAM: Okay.

22 MR. KOMMINENI: So in slide 6 on the

1 first step approval to install is issued, there is a
2 waiting period unless extended by mutual agreement
3 within six months of receiving an ATI or six months
4 from the completion of an upgrade, whichever is later.

5 Which, I mean, are we waiting for the
6 customer to get back to you guys? Or are we waiting
7 for the EDC to complete any upgrades?

8 MR. VERMOER: Yeah, I think for that
9 section, for level one, after they receive ATI and
10 stipulating the regulations, the EDC is waiting for
11 the customer to submit part two.

12 In a case -- in some cases where we see
13 the ATI sitting there in the queue for a long time
14 with no action, we do communicate to the customer,
15 letting them know that the ATI has been sitting there
16 with no action.

17 MR. KOMMINENI: So in this case maybe
18 we should correct that. So it is just the EDC is
19 waiting on the customer.

20 Okay. And the next question I have is
21 with the ATO itself. Our understanding is the ATO
22 would start from the day of the witness test to the

1 day it's issued, which is 20 business days. Is that
2 PEPCO's understanding too?

3 MR. VERMOER: Our understanding for ATO
4 timeline is from the time the customer submits part
5 two to the time the EDC issues ATO.

6 MR. KOMMINENI: So in that case, the
7 rulemaking shows that from the application date, which
8 is part two, the EDC has 10 business days or
9 mutually-agreed timeline to do the witness test plus
10 another 20 days to witness the ATO. Is that right?
11 Or is that something you guys want to review?

12 MS. BECKHAM: Do you mind, Alex, if I
13 jump in? And correct me if I'm wrong.

14 Taylor Beckham on behalf of PEPCO. For
15 level ones, I think the understanding is that there's
16 typically not a witness test being done.

17 So the count, the 20-day count for
18 authorization to operate ATOs begins when the
19 completed part two documents are submitted.

20 So the witness test timeline there,
21 again subject to what the experts say, I don't want to
22 say doesn't apply. But typically we don't see it.

1 MS. UMEAKU: And I just want to add
2 that sometimes we may do a witness testing as an audit
3 just to make sure that everything is in line. And so
4 that audit is done randomly, but it would be within
5 the ten business days.

6 MR. EDMONDS: Can you identify
7 yourself?

8 MS. UMEAKU: Sorry. Diane Umeaku with
9 PEPCO, DER Engineering.

10 MR. KOMMINENI: Thank you for the
11 clarification.

12 Going down, in section 4.6, we also
13 inform if the system is not -- cannot be connected to
14 the EDC safely and reliably, you know, I think it
15 fails the requirement.

16 And the EDC provides the explanation of
17 why the system or the Interconnection could not be
18 connected to the distribution system.

19 Typically what stage of the process do
20 you see or give that explanation to the customer? Is
21 it during the the screening time? Or is it more at
22 the front end during the application when it's deemed

1 complete or incomplete?

2 MR. VERMOER: Yeah, I'll jump in. Alex
3 Vermoer with PEPCO, DER Engineering, Interconnection.
4 I'll let my counterpart jump in.

5 Typically for that section what
6 we -- for us to trigger that section is after the
7 application is going through the technical screening
8 because upfront we wouldn't quite know what that
9 application requires until we've performed the
10 screening and informed the customer of the results.

11 MR. KOMMINENI: So just to confirm,
12 it's during the screening period when we review the
13 system. Thank you.

14 Going down the process --

15 MS. BECKHAM: Really quick. Sorry.
16 Just to add onto that. The -- with 4040.6, Taylor
17 Beckham on behalf of PEPCO.

18 To Alex's point about the fact that it
19 would be during the technical review process, I just
20 wanted to highlight how, you know, the A language
21 where it would determine that the small generator
22 facility could continue to qualify for Interconnection

1 pursuant to level two.

2 As Alex said, during that time, that's
3 when we might -- this might be triggered. And then we
4 would -- for level one projects, we would continue the
5 review at the level two.

6 MR. KOMMINENI: Okay, thank you for
7 that.

8 Going on to level two, again, we would
9 like to confirm on the number of days for the ATI for
10 level two, which again, based on the rulemaking, we do
11 notice 20 business days, which is 5 business days for
12 completeness plus 15 business days for the screening
13 to be completed.

14 MR. VERMOER: Yeah, for -- this is Alex
15 Vermoer from PEPCO, DER Interconnection. That's how
16 PEPCO understands the five days for completion and the
17 fifteen days for the technical screen.

18 MS. BECKHAM: I'll just add though,
19 what the regulations say is PEPCO has -- after five
20 days of determining that the application is complete,
21 PEPCO has -- and I'll just skip right to it.

22 PEPCO has 15 days to notify the

1 customer of their screening results. I think that's
2 just a distinction as far as ATI versus the screening
3 results. Does that make sense?

4 MR. KOMMINENI: Yes. So which leads to
5 my next question. So if it's 15 days for the
6 screening results, typically how many days does PEPCO
7 take to issue the ATI after the screening results?

8 MR. VERMOER: Yeah, so for the way the
9 regulations are written, after the screening results,
10 after 15 days, the customer will be notified of what
11 the results of the technical screening, meaning if
12 they have -- you know, if they don't have any upgrades
13 required or upgrades required at that point, if
14 there's no upgrades required, ATI will be issued.

15 If there are upgrades required,
16 they -- the customer will be notified and will be
17 notified that the ATI will have conditions of an
18 upgrade required.

19 For those that do have an upgrade
20 required in a period regulation and PEPCO has for 15
21 days to issue a good-faith cost estimates.

22 And that's with upgrades

1 that -- whether there's -- it is just a facility
2 upgrade. And for those, that's distribution system
3 upgrades; they have 30 days for that.

4 MR. KOMMINENI: So without any upgrades
5 it would be typically 15 business days. Am I right on
6 understanding that? And if it's -- if it has
7 upgrades, it would be either additional 15 days or 30
8 days?

9 MS. BECKHAM: Thirty days for PEPCO to
10 provide the non-binding good-faith cost estimate
11 letter and I guess the scope of work for the upgrades.
12 But it would be -- the ATI is conditional upon those
13 upgrades being completed.

14 MR. KOMMINENI: Okay. We will get back
15 to you guys on that.

16 I think those are the questions I had
17 for PEPCO.

18 Before I open up for the team, a couple
19 of questions or requests I have is in the slide which
20 I'm currently sharing, you will notice a star with a
21 number one on it.

22 And you will see that kind of

1 annotations in the next slides also where you have a
2 star and a number assigned next to it.

3 So what the staff has done is we have
4 taken, again, like a sample. We took CHESSA's pain
5 points and tried to map those on the flowchart itself.

6 So that in the upcoming sessions when
7 we are going through the process of improving the
8 Interconnection points, I think it's going to be very
9 helpful for us to indicate those points and start, you
10 know, kind of coming up with different solutions.

11 So my request to the different parties
12 here is maybe utilize the stack. And if you can plot
13 your pain points or any system improvements you would
14 like to do, I think that'll be very helpful.

15 Again, this is just a sample to show
16 how we plotted the CHESSA's request here.
17 Whatever -- which could be mapped to the flowchart, we
18 have mapped them.

19 And some of the additional questions
20 which we cannot map, but it's still pertaining to the
21 process, we have listed them here.

22 So my request to the team is, you know,

1 for the next session we would like you to take this
2 flowchart and plot your concerns or any improvements
3 you think so that we could start reviewing this as a
4 process flow and start addressing those.

5 With that said, I'm going to give it
6 back to Brian.

7 And, Brian, you can --

8 MR. EDMONDS: Sure. And I think it's
9 important to recognize that what we're trying to do in
10 asking your input is to identify any proposed rule
11 changes that you think the commission needs to
12 consider.

13 You know, as we mentioned a few months
14 ago, we'd like to, if we think it's necessary, submit
15 an interim report on the Interconnection process to
16 the commission because we got a lot of heavier items
17 that we want to tackle down the road.

18 But it might be wise for us to consider
19 what Dilip and his team has put together and the
20 request that he's making for folks for the next
21 meeting.

22 So that if we decide that it might be

1 wise to recommend some things to the commission for
2 rulemaking, that that would be an appropriate time to
3 at least have that discussion for that purpose.

4 All right, so we're going to open up
5 for questions.

6 I know, Ms. George, you had your hand
7 up. I don't know if you still have a question.

8 But does anyone else have any questions
9 from the staff presentation or PEPCO's responses to
10 the staff, questions?

11 MS. GEORGE: Yes, I think --

12 MR. EDMONDS: Please identify yourself.

13 MS. GEORGE: -- part of my question --

14 MR. EDMONDS: Please hold on. Please
15 identify yourself and your organization please.

16 MS. GEORGE: Of course. This is
17 Aleksandra George, Assistant People's Counsel at the
18 DC Office of People's Counsel.

19 MR. EDMONDS: Thank you.

20 MS. GEORGE: I think part of my
21 questions were answered. I think generally I'm just
22 looking for understanding.

1 And OPC has been -- as to the list of
2 considerations for applications for what qualifies for
3 something that would likely fail or not.

4 I don't know if the PSC has an
5 understanding of where that can be found or whether
6 there's a standard or, like, an operations manual that
7 PEPCO relies on internally.

8 MR. KOMMINENI: I don't think so that's
9 been listed in the rulemaking. We could certainly
10 look into it. But I can open it up to PEPCO to see if
11 they have any kind of documentation to explain how it
12 failed.

13 MS. BECKHAM: I'll start generally and
14 then ask for the team to join in.

15 Taylor Beckham on behalf of PEPCO. I
16 think from the -- or the application complete or
17 incomplete, there could be administrative issues in
18 terms of a missing address or other items that may
19 have a problem on the face of the application.

20 And I'll let the team speak in more
21 general or more specific terms rather related to that
22 of -- in terms of the completeness or incompleteness

1 of an application.

2 Then there is the technical
3 Interconnection requirements that are published on
4 PEPCO's website that speak to the various
5 Interconnection requirements that are required for
6 Interconnection with the PEPCO system.

7 And I'll just invite the team to
8 provide more specifics.

9 MR. EDMONDS: Before we move to them,
10 is that website link -- is that something you could
11 provide us? Appreciate it.

12 MS. BECKHAM: Yes.

13 MR. EDMONDS: Thank you.

14 I know Peter has a question. But I'm
15 going to let Diane and Alex respond.

16 MR. VERMOER: Yeah, no. It's Alex
17 Vermoer from PEPCO, DER Interconnection. I just want
18 to add to what Taylor said. I think from the
19 completeness standpoint, she covered it.

20 From a technical standpoint, I don't
21 think that to say that the -- there's a standard. We
22 do have technical requirements that the application

1 goes through, and that criteria would determine
2 whether an application fails the screening or not.

3 But it's a technical engineering
4 process that we go through to screen the applications.

5 MS. UMEAKU: I'll add just having an
6 updated and -- an updated and accurate structural
7 facility diagram is key.

8 And having a smart inverter, that is on
9 the list of recommended smart inverters for the
10 customer to have. Could make -- could also be a
11 factor in it being denied or not.

12 MR. EDMONDS: Thank you.

13 Peter?

14 MR. DAMROSCH: Hi. Peter Damrosch,
15 Department of Energy and Environment. So first of
16 all, I just want to say thank you to the commission
17 staff for sort of blocking everything out, including
18 for those of us who are a little more visually
19 inclined.

20 So a couple comments. I think the
21 first is, you know, there's been a fairly strong
22 chorus of commentators recommending that we look to

1 the IREC model rules to do a sort of update and
2 refresh to our rules.

3 So I think this is a helpful schematic
4 that we will try to use to compare the timelines and
5 process steps and the model procedures to what we have
6 currently.

7 A second point is, I think, you know,
8 this is very good for understanding what's in the
9 rules currently.

10 We also know though that the sort of
11 timelines get missed and don't always get followed.
12 So some of those may be rule-based changes.

13 But a lot of those are more about the
14 supporting pieces around the rules. So I think this
15 is a key part.

16 But then, you know, we do want to make
17 sure we're talking about, you know, staffing, dispute
18 resolution, incentives, everything else that helps
19 make the rules function well.

20 So I appreciate this sort of treatment.
21 And then just want to recognize the complimentary
22 measures that even once we get these sort of

1 rule-based timelines right will actually help us make
2 sure we're achieving the timelines of them.

3 But thank you for that presentation.

4 MR. EDMONDS: Thank you. I want to
5 respond to a question from Ms. Emily Peck about the
6 flowchart. I'm assuming you're talking about the
7 presentation that the staff made this morning.

8 It is currently available in the box
9 folder. I'll double check. But I believe it's there.
10 And if for some reason you don't have access to the
11 box folder, just send me an email. And I'll -- we'll
12 work on making sure that you have access to it; okay?

13 Also in the chat, Taylor, thank you.

14 Taylor has put the link in for the
15 technical considerations for contractors. So please
16 check that out.

17 MR. GOLEMBESKI: Yes, I'd like to have
18 a comment.

19 MR. EDMONDS: Go ahead.

20 MR. GOLEMBESKI: This is Dave
21 Golembeski with IREC. So thanks, Peter, for flagging
22 the IREC model procedures.

1 I want to note a couple items where we
2 think there could be, you know, alignment with the
3 model procedures and with a couple -- with many other
4 states.

5 So I think on the -- maybe the first
6 slide where you go through eligibility of projects,
7 one thing that we've seen adopted in a couple
8 different jurisdictions is expanding eligibility for
9 level one projects to include projects within
10 nameplate rating of 50 kilowatts when a project's
11 export capacity is limited to 25 kilowatts.

12 And that is sort of one step of
13 recognizing export limiting projects in the
14 Interconnection process.

15 You know, I think we'd want to identify
16 acceptable export control methods, identify power
17 control systems as an acceptable method for export
18 control, and then integrate for export control or
19 replacing nameplate for export control in particular
20 screens like the penetration screen and the -- or the
21 transformer rating screen, for example.

22 Those are all things that we can do to

1 make the process inclusive of export limiting
2 projects.

3 So that's one item. But moving to a
4 couple different timelines, we've
5 seen -- I've -- we've gone through and identified a
6 couple gaps, which I think some of them have been
7 discussed before, is -- with ATO is to ensure that all
8 levels have an ATO deadline, particularly level two
9 where there's been, you know, some issues establishing
10 a timeline to complete the study process for level
11 four projects.

12 We've seen a lot of states have it 45
13 days for the -- what is it -- for both study processes
14 steps. So the impact study is 45 days typically and
15 45 days for the facility study.

16 And then I think another piece that has
17 been touched on before is clarifying the ATI
18 definition and addressing some gaps there. And I
19 think we're in pretty strong alignment with the CHESA
20 proposal.

21 MR. KOMMINENI: Thank you, Dave. I
22 think that's really good -- and I think I'm glad we

1 did come up with this flowchart because now it at
2 least gives everyone a visual, you know, flow of the
3 process.

4 And I -- again, I want to bring this up
5 because it'll be very helpful.

6 Maybe, Brian, if we can put up a
7 PowerPoint deck itself for folks to edit.

8 So we would like you guys to take this
9 flow and add your concerns or if you have any
10 recommendations.

11 That will be very helpful to add it
12 to -- put a star and a number next to it. That way we
13 can start tracking all those pain points as well as
14 any recommendations.

15 Once we have that compiled, we could,
16 you know, go over them and start, you know, addressing
17 those issues.

18 And we will be looking at IREC and
19 other experts in the room to help us navigate through
20 some of those issues. Thank you.

21 MR. EDMONDS: All right. Any other
22 questions?

1 Go ahead, Nicole. Don't forget to --

2 MS. RENTZ: Nicole Rentz with
3 Chesapeake Solar and Storage Association, CHESSA.

4 I -- so I have a couple of questions if it's okay.

5 First you -- Taylor, I think you said
6 that ATI is conditional upon installation of the
7 system upgrades if they're required.

8 I think this kind of gets back to one
9 of the issues that CHESSA raised, which is, like, at
10 what point do we have authorization to install the
11 system that we've -- that's been proposed? Do solar
12 installers have that authorization?

13 And the Interconnection facilities and
14 distribution system upgrades, those happen after the
15 system's already been installed.

16 So if -- I mean, do you see the issue
17 that I'm bringing up here? Like, can you explain what
18 that means to you a bit more?

19 Like, does that mean that, you know,
20 the ATI could be, you know, changed? Or, I mean, this
21 is one of the issues we've raised is that the
22 technical specifications, equipment, requirements, and

1 even single-line drawings have been changed after what
2 we consider to be ATI has been granted.

3 MR. VERMOER: Alex Vermoer from DER
4 Interconnection. Before Taylor responds, can you
5 clarify when you say that the system hasn't been
6 installed before facility installations or the
7 distribution upgrades?

8 MS. RENTZ: Well, so what typically
9 happens is that, once the system is installed,
10 that's -- and we have the building -- the electrical
11 permits from DGS or whatever, you know, is required
12 then -- not DGS, Department of Buildings.

13 So the -- then we turn that over. We
14 have to report that to PEPCO through the portal. And
15 then you guys will schedule the work for the
16 Interconnection or the distribution system upgrades.

17 And so that happens after the system's
18 installed, which makes sense. I mean, of course you
19 wouldn't want to do that work before the system was
20 installed.

21 But if the ATI is conditional upon that
22 work being done but the work can't be done until the

1 system's installed --

2 MR. VERMOER: Yeah. And sorry, Taylor.
3 I'll let you respond.

4 But from our understanding of what
5 ATI -- when you say the system, I'm understanding that
6 the system, like the solar system or whatever the DER
7 is, our understanding of issuing ATI to install, it's
8 after you've gone through that and now you have
9 authorization. At least PEPCO understands that
10 developers don't install the system until they've had
11 ATI.

12 MS. RENTZ: Oh, yes. So we're given,
13 like, the signed Interconnection agreement. But
14 that's why I'm asking.

15 Because, Taylor, you said that it's
16 conditional upon those being installed so --

17 MS. BECKHAM: Conditional upon the
18 distribution system upgrades --

19 MS. RENTZ: Yes.

20 MS. BECKHAM: -- being completed. I
21 think what Alex is trying to say is a lot of times --

22 Do keep me honest here. Taylor Beckham

1 on behalf of PEPCO.

2 If the -- PEPCO will see a solar system
3 already being installed prior to its had to -- PEPCO
4 having a chance to conduct the technical review and
5 determine whether or not there's a need for
6 distribution system upgrades.

7 And PEPCO's understanding of the ATI is
8 if there are distribution system upgrades needed, it's
9 issuing -- it's saying you can install your solar
10 system upon completion of the distribution system
11 upgrades. And that's the condition there, the need to
12 complete those distribution system upgrades.

13 And I'll just go to -- and this is, you
14 know, just kind of our understanding is that that's
15 consistent with the definition of approval to install
16 in the regs, which means written notification that the
17 small generator facility is conditionally approved for
18 installation contingent upon the terms and conditions
19 of the Interconnection request.

20 And I, again, certainly would invite
21 the team to keep me honest here.

22 When that Interconnection agreement is

1 provided to you all and then you all are signing it,
2 there are conditions within that saying this is the
3 distribution system upgrades that need to be done.

4 So let me know if I said anything wrong
5 there, if you guys need to add anything.

6 MR. VERMOER: No, you're spot on.

7 But to that point, I mean, we do see
8 that, you know, developers installing the system
9 before they get the ATI.

10 And at that point, that's not PEPCO's
11 understanding. But I think that's the risk that the
12 developer takes in terms of, you know, when the study
13 is completed and, you know, facility upgrades or
14 distribution upgrades are needed. And the developer
15 has installed the system prior to getting the ATI.

16 MS. RENTZ: Okay, so is PEPCO's
17 position that the signed Interconnection agreement and
18 cost estimate is not a signal that you can then build
19 your system?

20 You have to finish any distribution
21 system upgrades that would be required before a
22 developer could install their system?

1 MS. BECKHAM: I'm going to just push
2 back in terms of the signed Interconnection agreement
3 in the cost letter serving as some level of a signal.

4 When we're talking specifically about
5 ATI, I think it's PEPCO's understanding that the ATI
6 that's provided in the situation where they're -- and
7 I don't even want to say the ATI that's provided.

8 The -- in the situation where there's
9 distribution system upgrades, the -- PEPCO will say
10 you can have authorization to install contingent upon
11 completion of the distribution system upgrades.

12 MS. RENTZ: Okay. Yeah, I think this
13 kind of gets back to the whole disconnect that led to
14 one of the reasons that CHESSA filed the
15 Interconnection letter and petition that we did.

16 Because I think there's some just
17 inconsistencies in how we understand. And
18 that -- hopefully this process can lead to clarity on
19 that and clarity in the rules on that.

20 Because in my experience, and from my
21 understanding, the distribution system upgrades can't
22 even be scheduled until we have an electrical permit

1 from DC's Department of Building that says, you know,
2 we've met the electric -- you know, the system's been
3 installed correctly and, you know, it's already been
4 installed.

5 So we basically can't even schedule
6 distribution system upgrades until the system has at
7 least been begun.

8 So yeah. I think that's -- you know,
9 I'll try to flesh that out more in some comments after
10 this.

11 But that's generally not how it's been
12 perceived or worked as far as I understand. But it's
13 in -- it's good to hear that from your perspective.

14 And then, so secondly, it's not just
15 the technical Interconnection requirements that you
16 all have on, like, what's required for installing a
17 system; right?

18 There's also design guides, engineering
19 specs, and approved product manuals. Can y'all
20 provide the link to all those that apply as well to
21 solar installers or for DER installers?

22 MS. UMEAKU: Sure, the link can be

1 shared.

2 MS. BECKHAM: Just want to check to
3 make sure that the link that I shared had all that,
4 but we'll check.

5 MS. RENTZ: Okay. And then can
6 the -- my last question has to do with something that
7 kind of -- I don't know if it fits in Interconnection
8 facilities or distribution system upgrades.

9 But how do y'all view outages, outage
10 requests? I know we get cost estimates for them.
11 So -- and this is for everyone else's knowledge. This
12 is something that usually only applies to NEMs, but it
13 also applies to the CREFs.

14 So if you're connecting behind the
15 meter, often, you know, distribution system upgrades
16 aren't required.

17 But in order to complete the system and
18 sort of land it in the -- you know, in the customer's
19 wires connected into their connection to the grid
20 behind the meter, you need to have the system cut off
21 so it's not live while you do that.

22 And that's called an outage request as

1 as I know PEPCO knows. But I was just trying to
2 explain for everyone else.

3 What do y'all consider that? Is
4 that -- you know, there's the two terms in the rules,
5 distribution system upgrades and Interconnection
6 facilities. But what would y'all consider that?

7 MR. EDMONDS: Before you answer that, I
8 just got two things I need you to clarify for the
9 stenographer.

10 MS. RENTZ: Yeah.

11 MR. EDMONDS: You used the term NEMS
12 and the CREFs. Could you tell us what that is?

13 MS. RENTZ: Right, so NEMS are net
14 energy metered systems. And they're systems that are
15 connected behind the meter and net metering
16 apply -- the net metering rules apply to them. CREFs
17 are community renewable energy facilities. So --

18 MR. EDMONDS: I just need to --

19 MS. RENTZ: Yeah, got it. Yeah, it's
20 hard to --

21 MR. EDMONDS: -- is clear.

22 MS. RENTZ: Acronyms are too easy to

1 slip into.

2 MR. EDMONDS: Thank you.

3 MS. RENTZ: Yeah, that's fine.

4 MR. EDMONDS: So now that we've given
5 the company a little extra time to come up with a
6 response, let's hear what the company has to say.

7 MS. RENTZ: I see the consultation.

8 MR. EDMONDS: Did that help? I gave
9 you some more time.

10 MS. UMEAKU: All right. So I'm Diane
11 Umeaku with PEPCO. So those type of outages is what
12 we call a customer-requested outage.

13 And so that is processed by our new
14 business team. And so there, it follows, the standard
15 PEPCO process for us taking in a customer-requested
16 outage.

17 So what our team here would do is help
18 support and facilitate that to make sure it's within
19 the right timeline.

20 But we -- there's a payment requested
21 for it. And we just receive it and process it as a
22 request to our control center to put in that outage

1 for the required time.

2 MS. RENTZ: Okay. So it doesn't fit
3 into either of those categories that are in the rules;
4 right?

5 MS. UMEAKU: It's not tied to any of
6 the rulemaking. It's just a standard PEPCO process on
7 its own.

8 MS. RENTZ: Okay. All right.

9 MR. VERMOER: Now, yeah, Alex Vermoer
10 from PEPCO DER Interconnection. Just, you know, Diane
11 provided on the customer side.

12 But just to talk about outages, just
13 overall outages, depending on what is required, there
14 could be an outage required to complete, whether it's
15 a distribution, you know, a system upgrade.

16 If we do need to take our part of the
17 system off in order to complete that, we can require
18 such an outage.

19 So you can look at outages broadly
20 where there is what Diane discussed. And there are
21 some outages internally that we would need to take
22 from our system in order to complete, you know, like a

1 distribution system upgrade.

2 MS. RENTZ: Okay. So I think you're
3 saying sometimes you -- well, you often need an outage
4 obviously to do a distribution system upgrade. Is
5 that what you're saying?

6 MR. VERMOER: I'm saying we can in some
7 instances, yes.

8 MS. RENTZ: But typically for, like, a
9 net meter system, behind the meter system that a solar
10 is landing, that wouldn't apply; right? That
11 distribution system of upgrades?

12 MR. VERMOER: No, I would probably say
13 very rare, if any at that.

14 MS. RENTZ: Okay. Yeah. All right.
15 Okay. Yeah. That's what I -- that was my question.

16 MR. EDMONDS: Thank you.

17 MR. KOMMINENI: Thank you, Nicole.

18 I would also encourage CHESSA to look.
19 Again, this is just a sample deck. I tried to pull
20 whatever you guys have submitted.

21 But I think it'll be good to revisit.
22 And if there's anything missing or if there's any new

1 items, I would recommend you to add it. Thank you.

2 MR. EDMONDS: So the PowerPoint
3 presentation, what you have is -- most of you have
4 access to the PDF version. But the actual PowerPoint
5 has now been uploaded to today's meeting, the April
6 1st meeting.

7 So as Dilip has asked, you know, if you
8 want to make edits, comments -- or not comments, I
9 guess, you can put them in the PowerPoint presentation
10 on the slide that you would like to have noted.

11 I will recognize that Sunnova had filed
12 some comments, I believe, as well as a recommended
13 decision of an administrative law judge before the
14 Public Utilities Commission of the State of Colorado
15 last month.

16 And it was filed after -- filed in the
17 folder for the March 4th meeting. We may move that to
18 some other place. But right now that's where it is.
19 I just want to make sure I acknowledge that.

20 We're going to take a break now. It's
21 10:56. We're going to take a break until 11:01. And
22 then we'll come back. And we'll hear from the

1 District Government.

2 And if there's any additional
3 questions, we'll take those after the District
4 Government has concluded with this presentation.

5 All right. For now, we're going to be
6 on a break until 11:01. Thanks.

7 (Off the record.)

8 MR. EDMONDS: All right, we're back
9 online for the formal case 1050 Technical Conference.
10 We heard from the staff.

11 Just one thing about the PowerPoint
12 presentation. We will get that up a little bit later
13 today. I had the wrong presentation that I uploaded.

14 So we'll get the right one up for
15 everyone's access. And then we'll remind everybody in
16 the email that we'll send out after the meeting.

17 I'm going to turn it over now to Peter
18 with the Department of Energy and Environment, Peter
19 Damrosch. And we will see the joint straw proposal
20 that has been prepared.

21 We -- again, we're going to allow him
22 to make his presentation. Please hold your questions

1 until after the presentation. And that way we can
2 have a robust discussion thereafter. Thanks.

3 MR. DAMROSCH: Great. And this is
4 Peter Damrosch from the Department of Energy and
5 Environment. I'm currently sharing my screen on, I
6 think, the online version.

7 Brian, I'm not -- that may not be what
8 comes up on the in-person screen. Great. There we
9 go.

10 MR. EDMONDS: I think everybody can see
11 it in Teams.

12 If you can see it, can someone just
13 raise your hand? We'll get it taken care of here.
14 Great, thank you.

15 Go ahead, Peter.

16 MR. DAMROSCH: It looked like it was
17 coming across our screen in the room too.

18 So just a little bit of background, I
19 guess we're six months into the commission's
20 investigation in Interconnection, which was launched
21 on October 10th.

22 And so at this six-month standpoint,

1 you know, there's been a pretty sizable number of
2 comments and a fairly large record of recommendations
3 that have already been submitted.

4 So one of our desires was just to start
5 centralizing some of the recommendations that have
6 been been made into sort of the key tools and
7 strategies that, you know, a fairly large number of
8 working group members are interested in pursuing. So
9 that was one motivation for bringing together this
10 straw proposal.

11 And then the second was I really
12 appreciated Grace Relf's presentation from last week
13 or two weeks ago.

14 And, you know, it was -- most people
15 here attended. But for those who didn't, Grace Relf,
16 an expert from NREL, walked through some of the
17 highlights from I2X, which is the DOE-funded
18 Interconnection innovation exchange projects, DER
19 Interconnection roadmap.

20 And this is a, you know, kind of
21 many-year research effort into best practices and DER
22 Interconnection.

1 And a lot of what she was highlighting,
2 you know, we at DOEE think are very sound best
3 practices and recommendations.

4 So we were going through the I2X guide,
5 noticing a lot of similarities between what I2X
6 recommends, what's in the IREC model procedures, and
7 tools and strategies that, you know, working group
8 members are broadly interested in.

9 So this straw proposal is something
10 that you'll see the sort of supporting organizations
11 at the top: DOEE, CHESSA, Sunnova, ConnectDER,
12 Microgrid Architect.

13 I think there are other organizations
14 participating in the technical conferences that have
15 spoken up already in favor of specifics of these
16 tools.

17 And you'll see at the top, we focused
18 on what we think is sort of some of the core
19 improvements to get the sort of timeline around
20 Interconnection moving more expeditiously.

21 There are other topics, like cost
22 transparency and other areas that are not included

1 here, but which perhaps in a future version we might
2 add just to keep the sort of centralizing the key
3 ideas that folks want to see.

4 So I sent this out ahead of the
5 Technical Conference a couple days ago. And I'm happy
6 to just to walk through a few of the highlights.

7 And I mostly want to have a
8 conversation with people in the room about if these
9 ideas make sense, and if so, what would be useful next
10 steps.

11 So the first main one is broadly, you
12 know, we and others have been recommending that the
13 commission look to the latest IREC model procedures as
14 the template for, you know, a number of changes to our
15 small generator Interconnection rules.

16 IREC earlier highlighted, you know,
17 their changes ranging from the eligibility criteria
18 for levels of review to the specific screens used that
19 are incorporating really the latest advancements, in
20 particular in areas like being able to have faster
21 Interconnection for export-limited facilities.

22 But they've also just, like, very

1 soundly thought through all the steps in the process
2 so that we can maybe avoid some of what we've had
3 currently, which is those gaps and dead ends.

4 I mean, you know, they put a lot of
5 effort into these rules. They update them every four
6 or five years.

7 And as we sort of note here, I2X and
8 the U.S. Department of Energy really recommends that
9 states don't have to go it alone, that they can look
10 to the IREC model procedures as a sort of backbone for
11 updating their rules.

12 So that's -- you know, primary
13 suggestion number one is we really look to the latest
14 and greatest in the IREC model rules as a backbone for
15 updating our small generator Interconnection
16 procedures.

17 The second is something that a number
18 of working group members have highlighted in comments,
19 which is around having a timeline, an Interconnection
20 timeline performance incentive mechanism.

21 And this is also something that Grace
22 Relf highlighted in her presentation from the other

1 week.

2 She walked through how the Hawaii
3 Public Utility Commission helped really guide a sea
4 change in Interconnection performance through a series
5 of reforms, one of which was having an actual sort of
6 PIM around Interconnection timeline performance.

7 And, you know, I don't want to short
8 sell what I think Grace highlighted, which is this is
9 one tool; you also need other tools and reforms.

10 But being able to have something like
11 what Hawaii has or other states that provides
12 financial rewards when Interconnection performance
13 goes well and penalties when they don't, I think are
14 pretty clear.

15 Oh, I'm sorry. I'm hearing from Brian
16 that the audio is coming in and out.

17 MR. EDMONDS: Sorry about that Brian.
18 Can you hear us? Just chime in real quick.

19 MR. CALDWELL: Is that -- this is Brian
20 Caldwell at Attorney General's Office. Was that
21 referenced to me?

22 MR. EDMONDS: No, Brian Lydic.

1 MR. CALDWELL: Oh, sorry.

2 MR. DAMROSCH: We are fortunate to be
3 blessed by a bounty of wonderful Brians.

4 MR. EDMONDS: Yes. We are all over the
5 place; aren't we?

6 Brian, can you just unmute yourself and
7 let us know if you can hear us? I think everybody
8 else is good, but I want to make sure that you're
9 fine. We saw your note in the chat.

10 Okay, well, go ahead, Peter.

11 MR. DAMROSCH: Great. And, you know,
12 in the Technical Conference compendium, PEPCO said
13 they support PIMs in general and are open to working
14 on this PIM.

15 And I would say I think the Public
16 Service Commission has also expressed, you know, a
17 strong desire for performance incentive mechanisms.

18 But as far as I'm aware, we haven't yet
19 adopted any. So I think this would be a great place
20 to start. And as a recommendation that we're happy is
21 when we get to next steps. Or, well, what does it
22 look like and how do we get there?

1 The next two recommendations go to a
2 little bit what I mentioned before, which is having
3 good rules as a foundation.

4 But then you need to make sure that,
5 you know, rules are being followed, that if they're
6 not there's troubleshooting.

7 And, you know, I think for years now a
8 number of parties have been recommending an
9 Interconnection ombudsperson or program. We at DOEE
10 have reached out to current and former ombudspeople in
11 New York and Massachusetts.

12 And we have contacts for others who are
13 standing by and very generous with their time if the
14 commission is interested in sort of bringing in some
15 people who have actually served in this role in other
16 states to hear how they go about helping with the sort
17 of, you know, less highly adjudicatory dispute
18 resolution problem solving that ombudspeople can
19 provide.

20 And in particular we wanted to note
21 that in New York the ombuds program is sort of a joint
22 effort between, you know, the regulator in that case,

1 the Department of Public Service, NYSERDA, and the
2 utilities.

3 And, you know, we do -- we see a lot of
4 advantage in that since kind of already we have to
5 provide a sort of informal ombuds role.

6 We frequently get asked questions about
7 how to navigate processes. Or, you know, I've reached
8 out to and contacted PEPCO and haven't heard back.
9 What do I do?

10 So since we're already informally
11 playing that role, I think it might
12 make -- help -- you know, it could make sense to
13 formalize this along the New York model.

14 Just walk quickly through the last
15 ones. But so, you know, an ombudsperson is a role
16 more broadly I think a number of organizations have
17 highlighted the need to really rethink our dispute
18 resolution processes.

19 And, you know, I look to I2X again as
20 sort of noting helpful examples from other states that
21 have dispute resolution processes that seem to work
22 well.

1 And in our trial proposal, we noted
2 with concern a recent decision from a hearing officer
3 here in DC about Interconnection true-up costs, sort
4 of questioning whether the regulations give the
5 commission jurisdiction over this kind of issue at all
6 or whether the commission could have a remedy.

7 And without, you know, delving into the
8 legal merits of that under the existing regulations, I
9 would say it clearly highlights a need to really think
10 about what does a forward-looking dispute resolution
11 framework look like because the end result of that
12 decision that PEPCO and developers need to fight this
13 out in court is going to be extremely expensive,
14 costly, and really not in our interests when we're
15 thinking about, you know, trying to meet our goals of
16 providing affordable energy and a cleaner grid.

17 So we have some recommendations there.
18 So at the end I'll sort of circle back. A couple
19 others I'll go through quickly.

20 I think these are very familiar now to
21 the commission. You know, the IREC model rules and a
22 number of parties recommend having technical

1 Interconnection requirements documents be filed with
2 the commission and subject to public comment and
3 review.

4 And that can often be for good reason,
5 which is to sort of identify improvements beyond what
6 PEPCO may already be doing.

7 I will highlight just a few others. We
8 and a number of industry groups have had questions
9 about meter socket adapters.

10 We asked a follow-up question to PEPCO.
11 I don't know if we've yet gotten a response. You
12 know, I know you all have been busy with lots of
13 different questions and answers.

14 But this was maybe six weeks ago where
15 Maryland, to our understanding, it had a very
16 extensive stakeholder process to sort of work through
17 how households and businesses could use meter socket
18 adapters and which ones would be approved.

19 And, you know, we've generally heard
20 good things about that. And so I think would
21 appreciate if PEPCO still thinks a DC-specific working
22 group or stakeholder process is needed, or if we can

1 just hopefully draw on the work that's been done in
2 Maryland and New Jersey and other states.

3 Last couple, so the commission has on
4 its agenda for later in the meetings or later in the
5 Technical Conference series public queues.

6 The reason we pulled it up to this
7 topic is I think when we're talking about sort of the
8 process flow diagram that commission staff helped walk
9 us through, the corollary to that process flow is
10 timeline tracking and understanding each step of the
11 process.

12 How long does it take where, you know,
13 not just anecdotally, where are the pain points, but
14 from a, you know, evidence data perspective where
15 that's cropping up.

16 So we did want to highlight that we
17 think unpacking what a good public queue looks like is
18 going to be a pretty core part of that understanding.

19 Is the process working? Do we have the
20 right data to sort of track it going forward?
21 Fortunately here, as in many of these tools, there's
22 just really great examples from other states.

1 New York and Massachusetts have
2 excellent public queues. And we have a wonderful
3 partner at the Massachusetts Department of Energy
4 Resources who's offered to share insights in how
5 Massachusetts puts together its queue.

6 And I also want to note the public
7 queues can be great not only for timeline tracking but
8 also Interconnection costs because that's where you
9 can keep track of, you know, cost estimates and final
10 cost upgrades.

11 Last couple, so number eight is sort of
12 a catchall for -- there's a bunch of other
13 improvements that parties have recommended that I
14 think respond to DC-specific concerns that may not be
15 in the IREC model rules.

16 I think we'll build this out a little
17 bit further. But I just wanted to sort of flag that
18 part of our joint proposal just concerns good ideas
19 that others have already brought to the table.

20 And then the last piece, which I do
21 think is going to be very valuable, is we've said a
22 number of times that, you know, after these limited

1 set of technical conferences we should have a standing
2 Interconnection task force.

3 And part of the idea there is it can
4 help speed up our work in these technical conferences,
5 if we know that there's a forum to keep working on
6 longer term projects and issues around
7 Interconnection.

8 So I think if we were all to sort of
9 commit to there will be an Interconnection task force
10 that would allow us to prioritize what these technical
11 conferences need to address versus where something
12 like hosting capacity or flexible Interconnection or
13 Interconnection application automated processing,
14 which I know is something PEPCO has been interested in
15 in the past.

16 You know, if we had a task force, we
17 could say some of those big ticket items, they'll get
18 addressed in the standing group. And that might help
19 these technical conferences sort of come to those
20 immediate improvements.

21 So that was the joint proposal. It's
22 sort of, as it stands, comes from five organizations

1 and has these nine major components.

2 Our -- we wanted to put them out there
3 because, you know, we think these have been brought up
4 a number of times that compliment the more
5 fine-grained rule analysis that the commission's
6 currently doing.

7 And if we can get either agreement or
8 general interest in specific ones of these, we and
9 other members of the working group can move them
10 forward.

11 You know, I think as you have seen,
12 just getting into the timeline rules, you know, it
13 takes a couple sessions.

14 If something like a dispute resolution
15 process, it's generally agreed that we need to sort of
16 update how we do that or if a timeline Interconnection
17 PIM is something that there's a lot of interest in,
18 others of us can help lead more of the work around.

19 Okay. What specifically does this look
20 like? So this, you know, straw proposal, you see it's
21 just five pages. They're sort of high level.

22 But if we have the interest from this

1 group, we are happy to do more of the development of
2 what these should look like.

3 We would obviously love to work with
4 PEPCO. And we have, you know, a sort of array of
5 technical assistance that we can draw on.

6 So we wanted to present this now, get
7 reactions from people in the group, and ideally then
8 be able to identify where would it be helpful for us
9 to dig in a little deeper, maybe in parallel with some
10 of the steps that are happening in the other
11 Interconnection technical conferences so that there's
12 something concrete for the commission and others to
13 react to.

14 And yeah. That's where it is now. And
15 then I do just want to offer. This is meant to be a
16 kind of living document.

17 So we intend to update it in between
18 meetings with new ideas, perspectives. We may do a
19 little bit of issue tracking to see sort of where do
20 different groups stand on these, you know, proposals
21 in case that's helpful.

22 That's the presentation part, and then

1 open it up to discussion.

2 MR. EDMONDS: All right, thank you,
3 Peter.

4 Are there any questions or comments? I
5 have a few on my end, but I want to open it up for
6 other participants. Questions? Comments?

7 Go ahead, Roger.

8 MR. FUJIHARA: Hi, Brian.

9 Thank you, Peter for that. I think on
10 item seven or eight, you had referenced the Maryland
11 systems on the feeder, maybe it's eight.

12 MR. DAMROSCH: Yes.

13 MR. FUJIHARA: But I am commission
14 staff. I'm not speaking for the commission. I'm
15 speaking as an individual right now.

16 So I have a little problem -- well, not
17 a problem, but a concern about Maryland systems. So
18 technically they receive a Maryland Interconnection
19 approval.

20 So there is some jurisdictional issues
21 that I see a problem, so to speak. So, like, when
22 PEPCO provides the map showing feeders -- on a feeder

1 serving the district, they will not -- PEPCO Green
2 Power Connection staff will not confirm to a customer
3 that they're eligible for DC certification.

4 And I don't blame them because that's
5 not their determination. So -- but their
6 determination of this, whether or not the system is on
7 a feeder serving DC.

8 Some developers come to us, come to
9 staff, and ask, "Are we eligible?" So obviously you
10 can understand that staff is reluctant to do that
11 because that's kind of like a pre-approval.

12 We're not going to pre-approve you and
13 come in for an RPS certification and then you come
14 back to us and say, "Well, you said that we were on a
15 feeder." PEPCO seems to disagree with that.

16 So I guess I have a concern about us,
17 like, delving too much into those MD systems. And I
18 just want to, you know, raise that issue. Thanks.

19 MR. DAMROSCH: Yeah, thanks, Roger.
20 And I think something that -- I know I said
21 this -- had been in one of CHESSA's request for
22 rulemaking.

1 And as you say, there are sort of
2 important considerations to talk through. I think
3 we'll, you know, hear those concerns particularly
4 around sort of pre-approval and take those back as we
5 think through kind of next iteration. But thank you
6 for that.

7 MR. EDMONDS: Hey, Roger, could you do
8 me a favor and spell your last name for the
9 stenographer please?

10 MR. FUJIHARA: Sure. It's F, as in
11 Frank, U-J-I-H-A-R-A.

12 MR. EDMONDS: Thank you.

13 Are there any other questions,
14 comments?

15 MS. BECKHAM: Just a few. And I guess,
16 is it okay if we just kind of give our wholesale
17 thoughts? Or do you want to go piecemeal?

18 MR. DAMROSCH: No, whatever. Yeah.

19 MS. BECKHAM: Okay. Well, I was just
20 going to say for the model Interconnection procedures,
21 I think basically kind of what staff did today as far
22 as the flow and then asking for, like, the comparison

1 for the IREC model procedures, I think that would be
2 helpful because to at least see exactly what it is.

3 Because I'm not so sure that kind of a
4 blanket just grab the model procedures and put them
5 into the small generator Interconnection rules as they
6 stand at least allows us to see exactly what the
7 changes should or shouldn't be, especially considering
8 that, you know, we've got specifics for DC.

9 So I think it would be good to -- if
10 you're saying, like, you would dig into that or
11 provide that side by side of the model IREC
12 procedures.

13 One of the -- and this kind of is
14 specific to the ombuds program and the, I think,
15 dispute resolution, which I think kind of go hand in
16 hand.

17 One of the questions I think that we
18 would ask if you've done or if you could do is kind of
19 a thought or assessment of, like, a cost to achieve
20 that type of process, if you will, in terms of what
21 staffing you all envision or the additional resources
22 and really the costs of that. So I think that would

1 be something that we would want to talk through.

2 And then I did have one -- I will say
3 we have responded to -- and I don't know if we want to
4 get into it here.

5 But PEPCO has responded to the position
6 related to the technical Interconnection requirements
7 and requiring commission approval to that. PEPCO is
8 opposed to doing that.

9 But we did provide our response to that
10 in our -- let me see here. I'm looking right at my
11 comments -- November 25th comments.

12 So if we want to keep talking through
13 that, that's good. But I could see that being maybe
14 another one of those deep dive points that you
15 flagged. And I think that's everything.

16 Did I forget anything, folks,
17 questions?

18 MR. DAMROSCH: If I could just, because
19 these are very -- so this is exactly what we want,
20 which is, you know, your suggestions for "Okay, we
21 hear an idea, but how would you actually move it
22 forward?"

1 So things like be able to go through
2 the IREC model rules and say, "Here's what's currently
3 on the DC books. Here's what, you know, the national
4 best practices is." It's recommended by some
5 organizations.

6 So we will definitely take some of that
7 back to keep going through specifics along the lines
8 of what Dave mentioned earlier on.

9 On another point that we wanted to kind
10 of raise for why we're doing this is I do think
11 version 2.0 ideally will start to include -- you know,
12 here's the proposal.

13 Here's where working group members
14 including PEPCO but others have weighed in on this
15 proposal, which document.

16 Because I think some of them, you know,
17 we may be at the point where it's just helpful to
18 elevate this to the commission if there's a difference
19 of opinion or see if we can all agree on something.

20 So technical Interconnection
21 requirements for example is something that I think
22 both I2X and IREC have a, you know, perspective on.

1 And that's not, I think, currently what
2 we've heard from PEPCO about the level of stakeholder
3 involvement or commission review and approval.

4 So it could certainly be something we
5 deep dive on or could be something where we say, you
6 know, "Is there room for agreement here?" or do we
7 just need the commission to sort of make a call?

8 So a future version of this I think
9 will definitely include, you know, where is in the
10 record already an expression of a position on this and
11 then where is that a sort of -- "This is really our
12 final position at the moment, and this should elevate
13 to the commission as a non-consensus issue," versus,
14 "Hey, there might be some play here if we could work
15 through some things."

16 And that I would definitely appreciate
17 in particular PEPCO thoughts on because we don't need
18 to do a deep dive on something if, you know, there's
19 just -- we have two different preferences.

20 And we can ask the commission to sort
21 of make a call. But we can also do a deep dive if
22 there seems, like, a productive, you know, middle

1 ground.

2 MS. BECKHAM: I'll just respond to that
3 briefly. Yeah, I think that makes good sense. I will
4 say, just sitting here today, I don't know of this
5 list where we could say, "Oh, you know, we're just at
6 a point where we're at an impasse."

7 You know, I think -- you know, we
8 haven't even gotten to the point where we've talked
9 about technical Interconnection requirements.

10 I was just highlighting that as a place
11 to refer as to where we've provided our comments on
12 that.

13 So I -- just sitting here today, I
14 wouldn't say this is off the table and something that
15 we should just elevate to the commission at this time.

16 MR. DAMROSCH: Yeah, definitely not
17 with something we circulate on Friday. But, you know,
18 in the coming weeks I think would be helpful to know,
19 you know, where do we think.

20 For example, the Interconnection
21 timeline, PIM, is something we've supported. You've
22 expressed some support.

1 So that may be something worth deep
2 diving. It's like, "Okay, there's something there for
3 us to work through in the coming weeks or months."

4 If we could collectively sort of say,
5 "The positions are clear. These are a set of issues
6 that can just proceed for commission," kind of call on
7 them if they're non-consensus; that could be helpful
8 too.

9 MR. ADEYEMO: Kunle Adeyemo on behalf
10 of PEPCO. And maybe this is a question for Dave.

11 Could you potentially do the IREC model
12 regs on the flowchart that the PSC staff provided?
13 That way we could compare them.

14 And also are there any jurisdictions
15 that you're aware of that have adopted the 2023
16 regulations so far that we could use as a comparison
17 to see how it's working, what the cost models are, or
18 anything of that nature?

19 MR. GOLEMBESKI: Yes, so I can attempt
20 to do that, edits to the flowchart.

21 So for the 2023 model procedures, New
22 Mexico is one state that has pretty systematically

1 adopted the model procedures.

2 But in past years, you know, we've been
3 releasing model procedures since 2005. And I believe
4 at least nine states have adopted, like, large chunks
5 of the model procedures. And numerous others have
6 adopted piecemeal of the procedures.

7 MR. EDMONDS: All right, thank you.

8 Anybody else have any comments or
9 questions?

10 Go ahead, Mr. LaFrance.

11 MR. LAFRANCE: Thank you.

12 Albert LaFrance with Solar Solution.

13 Disregarding the first recommendation where there's a
14 discussion of making a distinction between export
15 capacity and nameplate capacity, just wanted to point
16 out that as of January 1st in Maryland there is a
17 limited export agreement available that the utilities
18 are required to accept or to process.

19 So just wanted to put that on the table
20 as a possible recommendation to implement something
21 similar in DC and to solicit the views of the group
22 here and of PEPCO as to whether something like that

1 would be feasible in DC and what the benefits would
2 be.

3 MR. EDMONDS: Is that in a rule that
4 was adopted?

5 MR. LAFRANCE: Yes, that's the rule.
6 It's in the Interconnection regulations in Maryland.

7 MR. EDMONDS: Okay.

8 MR. LAFRANCE: And I can provide the
9 exact citation for that.

10 MR. EDMONDS: Please do.

11 MR. LAFRANCE: There's a section. It's
12 called -- I believe it's -- Limited Export
13 Interconnection is the title of that regulation.

14 And again, since it's the same utility
15 and similar situations, was just wondering if that
16 would be something we should be looking at in DC.

17 MR. EDMONDS: Right. I don't know if
18 the company has a reaction. You don't have to at this
19 point.

20 MR. ADEYEMO: We'll be happy to look at
21 that, but we don't have a response right now.

22 But I just did want to make sure that I

1 followed up on Dave's.

2 So New Mexico is the state we're going
3 to look at for the IREC regs. But then there's just
4 parts -- certain parts that have been adopted in
5 different states but not uniformly.

6 Because the -- and the reason why I'm
7 asking is that if we can get some sort of comparison
8 of what parts are working, I think that'd be really
9 helpful for us all as a way to move forward.

10 MR. GOLEMBESKI: Yeah, I mean, it's
11 difficult. You know, each state's Interconnection
12 procedures are designed, like, completely different
13 and set up differently.

14 So they have taken, let's say, you
15 know, those export provisions that I mentioned and
16 adopted them within the design of their procedures.

17 So it is set up differently. But I can
18 follow up. I think Brian has put in a comment. But I
19 can follow up with some more details of states to look
20 at.

21 MR. EDMONDS: So Brian's comment
22 is -- it looks like it's Oregon and Maine are also

1 largely in line with the IREC rules.

2 Is that -- are those the right states,
3 Brian? Oregon and Maine? Just put a thumb up.

4 MR. CALDWELL: Yeah, those are the ones
5 that have kind of most recently -- in addition to New
6 Mexico that have most recently updated their rules
7 and, yeah, have followed at least in terms of those
8 export provisions. But, you know, other concepts as
9 well.

10 MR. EDMONDS: Great. Thank you.

11 MR. ADEYEMO: All right. Kunle again.
12 So I just want to make sure we -- so is a goal here
13 that we want to -- going back to Peter, is that we
14 want to just adopt the IREC model flat out?

15 Or is this that you're saying that we
16 want us to look at each piece and see what would work
17 within the district?

18 And I guess that's why I'm asking this
19 question is, based on your reading of that, I don't
20 know if the point of this is to just say the IREC
21 models work or if we're trying to look at it and see
22 what would work within our jurisdictions and what

1 wouldn't.

2 MR. GOLEMBESKI: Yeah, I mean, I think
3 it's not necessarily us, you know, adopting it
4 wholesale, the Interconnection procedures.

5 But I think within the current, you
6 know, rules changing, you know, certain screens, like
7 the penetration screen to be based on export capacity
8 for example. So just changing that language for
9 example.

10 So I would say going -- you know,
11 having conversation line by line and discussing what
12 is in the Interconnection procedures versus what is in
13 the DC rules.

14 MR. DAMROSCH: And add, since we're
15 really fortunate to have IREC, it's actually
16 technically not an IREC proposal -- us.

17 So we can add there's a lot when you go
18 through the IREC model procedures where we just
19 thought very well about the definition of a certain
20 step where I think then sometimes five or ten years
21 later we realize, "Oh, that's becoming a sort of
22 source of inconsistent understanding."

1 So we can definitely do more of the
2 line by line comparison. And here would be ways where
3 if we wanted to change our current definition in the
4 DC rules to match the IREC rules, here's what you
5 would do, that kind of style.

6 But I think our suggestion is to really
7 work from the IREC model procedures as our sort of
8 test template to go through, you know, not just the
9 big process but the definitions and the other things
10 that they've spent a lot of time thinking about.

11 It can be more of, as Dave's saying, a
12 mapping exercise. So not just take the whole
13 procedures and adopt them wholesale.

14 But because they've thought so much
15 about the interrelations, you know, you just want to
16 make sure you're not introducing inconsistencies.

17 And so that's why we're sort of saying
18 we want to start with this as a template. That may be
19 helpful.

20 MR. VERMOER: Yeah. Alex Vermoer from
21 PEPCO, DER Interconnection. Just to follow up on the
22 question Kunle had, and this is for IREC.

1 Is that for the states that have been
2 mentioned? Is it full adoption? Or is it just parts
3 of the model?

4 MR. GOLEMBESKI: Yeah, I mean I think
5 it's large parts of -- again, you know, I think it's
6 not like they took the model language and submitted
7 that into the rules.

8 But they took major pieces of it and
9 integrated it within the structure of their rules.
10 And so, yes, New Mexico, Maine, and Oregon are those
11 examples. Does that answer the question?

12 MR. DAMROSCH: So you can definitely do
13 that kind of adaptation, which we can go through and
14 do as well.

15 Just sort of noting that as we do that,
16 keep in mind the parts of the model rules that are
17 sort of set up intentionally and how those would work
18 in DC.

19 MS. UMEAKU: And I'll add if there are
20 specific things in in the IREC that you would like to
21 recommend, let us know.

22 MR. EDMONDS: So I will note for

1 everyone IREC has uploaded -- we have uploaded the
2 IREC model rules in the publications and libraries
3 folder for the formal case 1050 Technical Conference.

4 So if you -- not IREC, but Peter has
5 actually uploaded. So if you want to see the model
6 procedures today, they're actually available for you
7 right now in the resources and publications library in
8 formal case 1050 Technical Conference.

9 And thank you, Mr. LaFrance. We will
10 look at those regulations from Maryland with regard to
11 the export limits -- limited export agreements.

12 MR. DAMROSCH: One other comment just
13 if there's time is, in addition to comparing the rules
14 now to IREC's procedures, I did find it very helpful
15 to go through the I2X DER Interconnection roadmap
16 comparing what we do to what they recommend.

17 You know, they go beyond just model
18 procedures, you know, to a whole other set of tools
19 and recommendations.

20 And I wanted to highlight, for example,
21 you know, they have set their recommended target for
22 Interconnection processing for small systems by 2030

1 at one business day.

2 So really, like, you know, we should be
3 able -- striving for -- get the whole thing done in a
4 fairly one-day kind of review timeline.

5 They acknowledge those are ambitious
6 goals. But I think you heard Grace Relf, the other
7 week's presentation say the Massachusetts utilities
8 are already basically there.

9 And I think the -- that's a helpful
10 second kind of foil for proposals here because it's
11 sort of, well, what does I2X say on this topic?

12 And I know PEPCO, before this meeting,
13 had said, "Well, maybe we could lengthen the timelines
14 for level one review in DC to match Maryland."

15 And I think it's just an interesting
16 comparison to see I2X kind of recommends the other
17 direction and thinking about just being able to test
18 proposals here against what's in that roadmap as well
19 is helpful.

20 MR. EDMONDS: So I guess it would be
21 helpful if the joint strawman proposers could assist
22 everyone, especially those who aren't part of your

1 team, to identify, you know -- I think this is -- I
2 think Diane mentioned this as well -- identify those
3 specific aspects and the current rules and now add the
4 roadmap that you think need to be flagged for
5 consideration by the group and ultimately the
6 commission. How soon do you think you can do that?

7 MR. DAMROSCH: Well, and that's part of
8 why I wanted to see the initial interest. So what we
9 put out here is these nine areas or sort of nine major
10 building blocks, any one of which we could dive
11 deeper.

12 So I know for sure number one is going
13 to get I think a deeper treatment. But it would help
14 to get a sense from the group and commission staff and
15 others which other ones are sort of high interest.

16 Because, to give an example, the
17 Interconnection timeline PIM, we could really dive
18 deeper; right?

19 So I2X recommends it. Grace Relf said
20 it worked in Hawaii. There's interest here. Do we
21 want to actually block out? What would that look
22 like?

1 We're happy to do that similar for
2 dispute resolution or other topics. But it would help
3 to get a sense of where we should focus our time
4 because we probably can't do it for all nine.

5 And in fact there's more than nine
6 because there are other building blocks we left out.
7 So definitely we want to help play that role.

8 And then maybe a sense of what does the
9 group think is high value, you know; then we can
10 figure that out or how we use our time.

11 MR. EDMONDS: So thank you for that.
12 Let me comment on the dispute resolution matter, in
13 particular the Evergreen decision.

14 Basically that decision, it's
15 confidentially. But I'll just kind of give a
16 high-level reflection of what the hearing officer
17 decided.

18 Our jurisdiction -- the commission's
19 jurisdiction is rather limited to just the utility and
20 the customers that are served by the utility.

21 But when we're talking about a dispute
22 that may involve a third party, in this case a

1 developer, gets a little gray area.

2 We don't have specific authority to
3 force someone other than the utility to do something
4 and a customer.

5 So that's going to be a challenge. I
6 would not put that high on the list of things. I
7 think the decision is consistent with my understanding
8 of how the commission operates.

9 We have just a very limited
10 jurisdiction with regard to that. And I don't believe
11 there's anything in any of the Interconnection
12 agreements that would say otherwise. So I want to
13 just note that.

14 The other thing is in the PIMs. I do
15 know that there was a report that was filed in
16 October, the end of October 2023, in formal case 1156,
17 which is where performance instead of mechanisms or
18 PIMs first arose out of that rate case.

19 And I see here in the report that there
20 was a DER or distributed energy resources performance
21 metric that was put on the table.

22 I do know that there's some tracking.

1 I think the company has to file monthly tracking
2 metrics.

3 I'm not sure what is involved there.
4 But let me just say this. I would rather wait until
5 after we sort of conclude the discussion of the rules
6 and before we dive into PIMs because it's going to
7 mess up the discussion until we have a clear sense
8 about what we want.

9 But I also need to be cognizant of the
10 fact that one of my other colleagues is actually
11 involved with the PIMs working group.

12 And so I think the best we can do is
13 make a recommendation to that working group, I guess,
14 through the commission.

15 We'll figure that out. But I
16 just -- the mechanics of it, I'm not sure that it
17 could come -- well, it could come from this group.

18 But I think it would have to be adopted
19 by the commission in that case. So I just want to
20 throw that out there.

21 MR. DAMROSCH: Yeah, and that's very
22 helpful because I know PIMs get brought up in

1 different forums.

2 Also now I think in 1176, there's
3 supposed to be another renewed emphasis on either
4 exploration or adoption of PIMs building on the --

5 MR. EDMONDS: Yeah, the company has to
6 propose PIMs in the next rate case.

7 MR. DAMROSCH: So this is one of the
8 areas where, if it helps the company, they know they
9 have to propose PIMs.

10 They know there's some group that's
11 interested, even though it's not exactly the same as
12 the PIMs working group.

13 You know, this could be an area I
14 wholeheartedly agree getting the rules right. Makes
15 sense. Including then for a PIM because it would
16 track the deadlines and the rules.

17 If there's interest in this, we on our
18 end maybe would just start getting our ducks in a row
19 a little bit because there may be something where, in
20 order to have an effectively designed PIM, you want to
21 keep in mind something when you're writing the rules.

22 So it's definitely more it comes out of

1 the rules. But maybe there's some interrelation. So
2 that would be just our sort of maybe early exploration
3 of this idea if there were interest.

4 MR. EDMONDS: I think the thing that we
5 have to -- the reason why I say we have to wait is
6 because we may ask the company today -- and I'm just
7 hypothetically saying this -- "Can you just start
8 tracking something with regard to Interconnection?"

9 And it's probably going to look -- you
10 know, I don't know what it's going to look like. But
11 it may not be something we all like. It may be
12 something we all do like. I don't know.

13 But then we changed the rules. And
14 then we don't have any data to compare, you know, how
15 the company's performing because we just instituted
16 new rules.

17 I don't think it's fair to the company
18 that we hold the company to a standard from the old
19 rules when we have adopted new ones.

20 But then we have to think about whether
21 or not we have to track the performance before we
22 decide what the PIM is.

1 And so then I would ask then for
2 everyone to consider what other states have looked at
3 for developing any DER Interconnection PIMs. I
4 don't -- you know, I'm -- it's broad.

5 MR. DAMROSCH: Yeah.

6 MR. EDMONDS: What is it that
7 they're -- that other states are looking at to
8 consider instituting a particular performance instead
9 of mechanism? So I would want to throw that in as we,
10 you know -- that particular --

11 MR. DAMROSCH: Yeah, and that's very, I
12 think correctly, foresighted. To give an example, I
13 was -- Grace Relf cited this paper the other week on
14 distribution group studies. I was one of the
15 co-authors of that a couple years ago.

16 And in Massachusetts, which is one of
17 the jurisdictions that has really done the most on
18 group studies at the distribution level rather than
19 cluster studies at the transmission level, there was
20 an interesting interaction with -- they have a
21 timeline enforcement mechanism, so a version of a PIM.

22 But they designed it for individual

1 studies, not group studies. Then they added a group
2 study process.

3 And when it came time for the utilities
4 to file their timeline enforcement mechanism
5 compliance, they just had to say, "Well, we couldn't
6 do anything on group studies because that's
7 not -- that's now in the rules, but it's not in the
8 PIM"; right?

9 MR. EDMONDS: Right.

10 MR. DAMROSCH: And so when you update
11 the rules, then you need to go back to the PIM and
12 sort of update it.

13 So I think that was an example.
14 Massachusetts kept the rules evolving and not update
15 their timeline enforcement mechanism.

16 So it's -- once you go in this
17 direction, you do need to refresh all the tools that
18 link to each other and kind of keep that in mind.

19 MR. EDMONDS: The other thing I would
20 ask, I know the idea of the ombudsman has been raised
21 in a number of instances that I've seen in comments
22 and all.

1 If there's a way that you can kind of
2 at least identify an order or whatever rules or
3 whatever in -- I guess it's New York that's adopted
4 it.

5 I can't promise you that it's something
6 the commission would actually adopt as well. But I'd
7 want you to at least present to us what you have so
8 that we -- you know, we can present it to the
9 commission.

10 So, you know, as we get closer to
11 discussing that, I think there's mention that the I2X
12 has something in there as well. So I'd be interested
13 in knowing more about that.

14 MR. DAMROSCH: Yeah, absolutely. And
15 as Taylor, I think, rightfully said, that ombudsperson
16 and the dispute resolution process often go kind of
17 hand in hand for -- so we're happy to pull up some of
18 the orders that have instituted those.

19 I'll also add, there are a number of
20 state legislatures that have now started requiring
21 their commissions to have an Interconnection
22 ombudsperson. So --

1 MR. EDMONDS: How are they funded? Do
2 you know?

3 MR. DAMROSCH: I don't know the funding
4 mechanisms. I don't know if it's state legislative
5 appropriations or the standard way that PUC staff are
6 funded, you know, through ratepayers.

7 So I'll -- we'll find the orders. But
8 just note that to add that there's an increased number
9 of legislatures that have sort of said, "We've been
10 hearing about this for a while and not every state has
11 done it."

12 So, you know, I think that speaks
13 to -- if you can get -- state legislatures also get on
14 board, there's an acknowledgement that these roles are
15 valuable for local clean energy goals.

16 MR. EDMONDS: Got it. Thank you.

17 MR. KOMMINENI: One quick question. So
18 regarding the ombudsperson, would that person sit with
19 the commission or the company, or which organization
20 do they represent?

21 MR. DAMROSCH: Usually at a minimum the
22 commission. So it's a, you know, commission

1 ombudsperson who's helping.

2 And that has a couple advantages. One
3 is -- so it's, you know, informal dispute resolution,
4 navigating the process.

5 But they can also serve as sort of eyes
6 and ears for the commission. You know, they're really
7 involved in understanding what's going on on the
8 ground with Interconnection. So that can then inform
9 the commission more broadly about, you know, the
10 nature of events.

11 New York is one place I know of where
12 the Interconnection ombuds program has a PUC
13 designate, a state energy office, a designate, and a
14 utility person.

15 So, you know, the kind of several
16 organizations involved. But, you know, my
17 understanding is it's pretty critical for the
18 regulator to be leading or co-leading the effort.

19 And then, as I mentioned, we have the
20 current Interconnection ombudsperson for New York is
21 happy to kind of come present and the former
22 Interconnection ombudsperson from Massachusetts.

1 And they would be able to add sort of
2 more texture and detail, at least for those states,
3 how they approach those roles.

4 MR. EDMONDS: Thank you.

5 Taylor, you had something?

6 I know Thomas has something, but I
7 want --

8 MR. ADEYEMO: Sorry, quick question
9 about that. The one thing is -- Kunle Adeyemo from
10 PEPCO.

11 For the ombudsman, how would that apply
12 to NEM customers versus, like, a CREF; right? Because
13 CREFs aren't customers, but a NEM would be. So is
14 there a difference there?

15 MR. DAMROSCH: Yeah, and I would back
16 up one step because this has come up. You know, I
17 think Brian said a version of it. I'll use last
18 names. Brian Edmonds said a version of this.

19 And now you -- I just want to offer, my
20 understanding is there are a number of states that
21 have evolved their understanding of what a customer is
22 so that an Interconnection customer is a kind of

1 customer, somebody who wants to plug into the grid as
2 opposed to just draw power from the grid.

3 So just offering that, I think if you
4 read, it's increasingly common to see that because
5 it's an understanding that historically the only
6 customers were people took power from the grid. But
7 now there are customers who are trying to export power
8 on the grid.

9 To your question about whether -- I
10 don't know how other states -- I assume states have
11 both NEM programs and community solar programs.

12 You know, have -- my assumption is just
13 one Interconnection ombudsperson who's overseeing and
14 helping with both processes.

15 But that would be good to track and
16 understand if maybe there's separate roles for those
17 different areas.

18 MR. EDMONDS: Okay. Thomas, I have you
19 next. Please spell your last name and tell the
20 organization you're from for the stenographer.

21 And then we'll go to Nicole.

22 MR. BARTHOLOMEW: Sure. Yeah. Thomas

1 Bartholomew with the Department of Energy and
2 Environment. It's B, as in boy, A-R-T-H-O-L-O-M, as
3 in Mary, E-W.

4 And I was really just looking, Brian,
5 to clarify what you sort of meant about presenting the
6 ombudsman case to you.

7 Is that -- would that be something,
8 like, in this series of working group proceedings or
9 some other method? I just wanted to clarify that,
10 what you were looking for from us.

11 MR. EDMONDS: Well, it's part of the
12 straw proposal. And so at some point -- even though
13 it's not among the list of topics that we identified
14 early on for this Technical Conference, at some point,
15 you know, these type of suggestions have to, you know,
16 see the light.

17 And we need to actually hear from
18 whoever's proposing them what it is that they're
19 proposing and why they believe it's something the
20 commission should consider.

21 So if you have that, why -- that's why
22 I'm asking these questions. And you may want to then

1 go back and do the additional research and add a
2 little bit more color to this.

3 We're not going to just ignore it after
4 the -- today's meeting. But at some point we're going
5 to revisit some of these things.

6 The problem is that we have a -- we
7 identify topics that we want to cover. And
8 the -- these aren't -- not everything on here in the
9 proposal is among the topics.

10 So we got to figure out. We'll figure
11 out them on the staff exactly at what point we're
12 going to revisit these things.

13 But I just -- as I'm looking through
14 the list, there's just some things that I wanted to
15 comment on and have you all be thinking as you're
16 coming back.

17 So we'll circle back and deal with
18 these at some point down the road. I don't know if
19 that helps.

20 MR. BARTHOLOMEW: Okay. So yeah,
21 sorry. It's just -- it's helpful to be specific
22 because, I mean, we could obviously submit, like, a

1 more detailed writeup similar to what we have here.

2 Like, we're -- it's all just written out.

3 MR. EDMONDS: Yes.

4 MR. BARTHOLOMEW: Or we could prepare
5 to do a presentation or both. Is there -- you know, I
6 just -- what should we be thinking about in those
7 terms?

8 MR. EDMONDS: Right. I think we're
9 going to have to have you make a presentation.

10 MR. BARTHOLOMEW: Okay.

11 MR. EDMONDS: And then we can get
12 feedback. And then at some point we'll figure out. I
13 mean, we're going to talk about it among the staff
14 about how we're going to handle this. I don't think I
15 have a good answer for you at this very minute.

16 MR. BARTHOLOMEW: Sure.

17 MR. EDMONDS: But, you know, we'll
18 figure it out. And we'll be sure to let everybody
19 know.

20 MR. BARTHOLOMEW: It's helpful for
21 planning. But that's fine. Yeah.

22 MR. EDMONDS: Yeah.

1 MR. BARTHOLOMEW: Thank you.

2 Appreciate it.

3 MR. EDMONDS: Thank you.

4 Nicole?

5 MS. RENTZ: Yeah, I was just going to
6 second what Peter said as far as, you know, who is a
7 customer and making that clear in the rules so that
8 there are actual remedies available to particularly
9 CREF customers, you know, and NEM
10 customers -- sorry -- community renewable energy
11 facilities and net energy metered facilities maybe
12 would be treated differently, you know, because, you
13 know, I think you could --

14 But it should also be clarified that,
15 you know, in that case, disagreements are -- or
16 disputes that are being sort of handled by a developer
17 are being handled on behalf of the net energy metered
18 customer that they're applying for.

19 And then for community renewable energy
20 facilities, which, you know, are owned separately and
21 connected in front of the meter, yeah, I mean
22 there's -- it is exactly what Peter was saying.

1 There's -- you know, there should be a
2 definition of customer that encompasses those entities
3 because otherwise there's just no remedies for us
4 anywhere except I guess at the courts, which, you
5 know, we -- and we have to abide by all of these
6 Interconnection procedures and standard agreements.

7 And there's purportedly dispute
8 resolution mechanisms in the rules that just don't
9 work.

10 So yeah, just second that as being an
11 issue and the definition that we should clarify if
12 there's disagreement about it.

13 MR. EDMONDS: So let me ask a question
14 to follow up on your point. As a developer, you're
15 basically representing the interest of your customer
16 who is the actual customer generator.

17 And I guess, if I'm understanding this,
18 you're sort of standing in the shoes of that customer
19 throughout the process?

20 MS. RENTZ: I think when -- you're
21 talking about net energy metered systems?

22 MR. EDMONDS: Yes.

1 MS. RENTZ: You know, if that's the way
2 we want to interpret it, yes. So yeah. And -- but in
3 those cases too, there might be power purchase
4 agreements that could complicate ownership issues. So
5 we should clarify those definitions and how they would
6 apply in a dispute resolution process.

7 MR. EDMONDS: Right. Okay.

8 MR. DAMROSCH: And I did want to offer,
9 this goes back to, you know, if there are areas where
10 we can dig in more.

11 So the I2X roadmap I think highlights
12 that in a number of states, the dispute resolution
13 processes between developers, you know, which we
14 sometimes call Interconnection customers.

15 But developers and the utilities, you
16 know, really do happen within the public utility
17 commission space, as you sort of see from the summary
18 paragraph, rather than saying these all need to go to
19 court.

20 I think, you know, regardless of
21 where -- what the DC regulations currently kind of
22 allow for, seeing where other states have gone and

1 maybe getting an understanding of why they've gone
2 with those models and how we may or may now want to
3 recommend adapting them here is I think something we
4 would certainly be interested in recognizing this
5 may -- yeah -- require changes to the regulations and
6 potentially a new authorities or something, just
7 understanding why I2X sort of calls this model out as
8 opposed to maybe what's being done so far in DC.

9 MR. EDMONDS: Okay, so the -- so I'm
10 going to ask a follow-up question. But I just want to
11 flag this.

12 The things that I'm raising -- and
13 it'll be in the transcript -- are things that I would
14 want you all to look into further.

15 I'm not dismissing them by asking a
16 question. But I'm kind of prompting you, "Okay, well
17 you need to go a little further."

18 So I will first acknowledge that in 15
19 DC MR, 15 DC Municipal Regulations Section 4009, is a
20 dispute section that currently exists for small
21 generator in connection facilities.

22 One of the things that I would want you

1 all to come up with is to identify -- you know, there
2 are four provisions listed for subsections.

3 Look at those, compare them to
4 whatever, you know, I2X or the IREC rules, and go a
5 step further and identify not just with the disputes.

6 But what happens if there is a
7 violation or someone, whether it be the customer or
8 the utility, doesn't comply with the rules? What
9 happens?

10 Because I don't think our rules go that
11 far. And so I'm curious -- would be curious to know
12 about that. If that helps.

13 MR. DAMROSCH: Yeah. And very -- this
14 is exactly why we're hoping to sort of get the
15 thoughts on key questions like those that we can dig
16 into further. So really appreciate your thoughts.

17 MR. EDMONDS: Right. I don't know if
18 PEPCO has anything.

19 MS. BECKHAM: No, I think we just have
20 responses that we will provide once we see --

21 MR. EDMONDS: It's going to be a fluid
22 conversation.

1 MS. BECKHAM: Okay.

2 MR. EDMONDS: But what I would
3 want -- I want to go back to the -- my response to Mr.
4 Bartholomew.

5 I don't want you all to not do anything
6 between now and whenever we bring this up. The more
7 work that you can do, you know, outside of this group
8 to kind of, you know, add some meat to this is helpful
9 because at some point we're going to come back to it.
10 I just can't tell you when. We just got to talk among
11 ourselves.

12 But what I'm trying to do is I'm trying
13 to prompt you is the things that I want to make sure
14 that you're looking at so that we don't come back and
15 we're just looking at this. So if that helps.

16 MR. DAMROSCH: Agreed entirely. And
17 that's -- yeah. Okay. Part of why we want to
18 introduce this now, even though I know some of the
19 topics were sort of later in the conferences, because
20 we can be doing that kind of homework and research.

21 MR. EDMONDS: Right.

22 MR. DAMROSCH: We'll make those

1 discussions more hopefully useful. So thank you.

2 MR. EDMONDS: Got it.

3 Thomas, do you have your hand?

4 MR. BARTHOLOMEW: Yes. So just maybe
5 for your reaction, if we took some time and wrote out
6 more details on a couple of the points that you
7 mentioned you wanted to know more about and then
8 submitted that to you in at least the written portion,
9 would that be helpful even if we were going to do a
10 presentation again later?

11 MR. EDMONDS: That's fine. That would
12 be fine.

13 MR. BARTHOLOMEW: I'm just, you know,
14 trying to make concrete, saying --

15 MR. EDMONDS: No, I understand.

16 MR. BARTHOLOMEW: -- do some more work.
17 You know, what -- how would we do it. So that could
18 be a way we can do it.

19 MR. EDMONDS: Yeah. If we -- that'll
20 keep everything moving. What I don't want to do is
21 have things just stopped until we wait.

22 I -- as you probably can tell, I got to

1 keep things moving. And so if something stops
2 somewhere, I'm going to go to something else that I
3 think can move. And that's what we're going to do;
4 all right?

5 And we'll figure it out among the staff
6 as to when we'll place it on the agenda because I
7 can't even tell you what the agenda is going to be for
8 the next meeting because we've got so much we've got
9 to think about.

10 All right. Are there any other
11 comments, questions?

12 We've got to come up with a meeting
13 date. The first Tuesday in May is May the 6th. Does
14 anybody have any objections to that being the next
15 meeting date?

16 We'll meet at ten to twelve. I can't
17 tell you what the agenda is going to be at this point
18 because we have to think among ourselves what we're
19 going to do as a staff. And we'll come up with
20 something.

21 We apologize for sending our
22 presentation later. I know we had a deadline for

1 presentations. But we had a lot of stuff going on.

2 MR. GOLEMBESKI: One comment on that on
3 the -- for the agenda. We, IREC -- this is Dave
4 Golembeski with IREC. We submitted some supplemental
5 questions --

6 MR. EDMONDS: Yes.

7 MR. GOLEMBESKI: -- for PEPCO. And
8 hoping that maybe next meeting we can go through those
9 with PEPCO.

10 MR. EDMONDS: Sure. Would that be
11 fine?

12 MS. BECKHAM: Yeah. That's fine.

13 MR. EDMONDS: Okay. If you -- anybody
14 else has any other questions, if you could just drop
15 them. You can circulate them, but make sure they get
16 dropped in a box. And we'll figure out -- we'll tee
17 those up for discussion at the next meeting.

18 MS. BECKHAM: One thing I'll just say
19 just as we're talking about the -- and this is just
20 off the top of my head -- those questions from IREC.

21 I think -- let me actually pull them
22 up. I think that they were -- here we go -- related

1 to more technical aspects.

2 And I -- and to the point, I know that
3 we've got the ask out here for the overlay from the
4 IREC procedures on the flowchart that staff has put
5 together.

6 If some of -- and I think because we're
7 talking about the non-export systems versus the export
8 systems, like as that overlay is coming together,
9 could -- I mean we're happy to respond.

10 But I think if that all coincides, that
11 would be actually a pretty, I think, efficient use
12 there.

13 So some of the questions from IREC may
14 feed into that overlay that we're requesting from IREC
15 on top of the --

16 MR. EDMONDS: Got it. Do you think you
17 can have that?

18 MS. BECKHAM: Does that make sense?

19 MR. EDMONDS: Dave?

20 MR. GOLEMBESKI: Yes. I think so.

21 Yeah.

22 MS. BECKHAM: We'll still respond, but

1 yeah.

2 MR. GOLEMBESKI: Okay.

3 MR. EDMONDS: All right. Then we may
4 tee that up for next next meeting.

5 All right. Do we have anything else?
6 We're good?

7 MR. KOMMINENI: I'm good.

8 MR. EDMONDS: All right. So reminder,
9 the minute meetings -- the meeting minutes are being
10 prepared by the District Government this month, PEPCO
11 next month, and OPC in June.

12 We had some brief discussion about
13 Grace Relf from the Lawrence Berkeley National Lab.
14 Her presentation, if you have not seen, didn't -- was
15 not able to attend the session on March the 20th, a
16 recording is available in the box folder as well as
17 her presentation and a link to the I2X roadmap, which
18 is also actually in our box folder.

19 You actually have it there. So you
20 don't even have to use the QR code in her
21 presentation. We already have it downloaded in the
22 resources and publications library in the box folder.

1 If for some reason you don't have
2 access to the box folder, just send me an email; and
3 we will follow up with you.

4 It is now 12:03 p.m. I think we're
5 done for today, unless anybody has anything else that
6 they would like to discuss. We had a really good
7 discussion today from the staff and DOEE.

8 Any other comments, questions?

9 All right. We're done for the day.
10 Y'all have a great rest of the day. Thanks.

11 (Whereupon, at 12:04 p.m., the
12 proceeding was concluded.)

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CERTIFICATE

I, SAMUEL PACHON, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action



SAMUEL PACHON

Notary Public in and for the
District of Columbia

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I, ANDREW TINGLEY-BARRAZA, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



ANDREW TINGLEY-BARRAZA

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