

1 BEFORE THE PUBLIC SERVICE COMMISSION
2 OF THE DISTRICT OF COLUMBIA

3 -----
4 IN THE MATTER OF THE 15 DCMR Case No.
5 CHAPTER 40 - DISTRICT OF RM40-2022-01
6 COLUMBIA SMALL GENERATOR
7 INTERCONNECTION RULES,
8 and
9 IN THE MATTER OF THE INVESTIGATION Formal Case
10 OF THE IMPLEMENTATION OF No. 1050
11 INTERCONNECTION STANDARDS IN
12 THE DISTRICT OF COLUMBIA.

13 -----
14 ADVANCED INVERTER WORKING GROUP MEETING
15 DATE: Thursday, May 15, 2025
16 TIME: 10:46 a.m.
17 LOCATION: Public Service Commission of the
18 District of Columbia
19 1325 G Street Northwest, Suite 800
20 Washington, DC 20005
21 REPORTED BY: Olivia Thompson
22 JOB NO.: 7347522

A P P E A R A N C E S

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List of Attendees:

Kunle Adeyemo, Assistant Attorney General, Pepco

Thomas Bartholomew, Department of Energy & Environment

Taylor Beckham, Assistant General Counsel, Pepco

Holdings

Jack Bertuzzi, Ecogy Solar

John Budd, Capacity Planning and DER Engineering

Standards Group, Pepco Holdings

Nina Dodge, DC Climate Action

Brian Edmonds, Office of the General Counsel, Public

Service Commission

Tasha Kaewnukultorn, Capacity Planning, PHI

Abdul Kargbo, Pepco

Albert LaFrance, Commercial Technical Specialist,

Solar Solution

Brian Lydic, Chief Regulatory Engineer, Interstate

Renewable Energy Council

Laura Ward, Energy Innovator Fellow, Department of

Energy & Environment

Harry Warren, Center for Renewables Integration

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

2 UNIDENTIFIED SPEAKER: -- a
3 standardized -- process, and all this was shared
4 amongst the interconnection community versus it being
5 all -- an idea that they move forward. Other than
6 that --

7 MR. ADEYEMO: Well, so two ways. So
8 that -- that's a system of -- obviously -- address
9 residential system, and I -- but that's not -- so we
10 have a rather large -- system that the primary
11 reservoir gets. In the process of -- the introduction
12 process. If, for instance, that system should be
13 allowed to go online early but at a restricted
14 level -- inverter controls, and then slowly brought up
15 to speed as the various -- parameters are raised, you
16 know, people could be getting -- right, and, you know,
17 can be generating some -- whereas currently it's
18 generating -- so -- once -- you can interconnect
19 earlier with inverter -- and, again, I'm not -- I'm
20 not trying to speak -- for residential systems, I
21 don't think --

22 MR. EDMONDS: Thank you very much. I

1 want to pause for a second to have a host in the room.
2 When you speak, also would you please at least state
3 your first and last name, spell your last name for the
4 stenographer so she can -- I'm going to -- being
5 raised, and so we can -- we're going to start with
6 Mr. Warren.

7 MR. WARREN: Thanks, Brian. Harry
8 Warren, W-A-R-R-E-N, with the Center for Renewables
9 Integration.

10 Hey, I've actually got a -- just a
11 couple of questions. One, you -- you laid out kind of
12 a clear process where you go through your set of
13 various approaches to handling the inverter setting,
14 the fixed power factor, then Volt-VAR, and then maybe
15 adding volt watt. Do you ever get through that
16 process, and -- and you're -- and you expect, like,
17 you're not going to be able to resolve the violations
18 just through those inverter settings, and then you
19 have to iterate back over to say, well, we're going to
20 have to do something in combination in some level of
21 system upgrade and modifications. And then you
22 envision that you're going to go through some

1 iteration between a combination of upgrades and
2 inverter settings that -- that try to reach
3 that -- that optimum of, you know, minimizing upgrades
4 to doing the best you can with the inverter settings.
5 Is that anything that you've seen or that people might
6 expect?

7 MR. BUDD: Yes, that is definitely
8 something that we do and something that can be
9 expected, where you might have hybrid of settings and
10 outreach, usually setting -- there to try and work
11 with whatever is the higher or greatest.

12 MR. WARREN: Right. Yeah, I figured
13 that might come in, like when you -- when you get into
14 the volt watt setting, if that's something you want
15 entertain, that's where people are really starting to
16 wrestle, then, with the -- the level of curtailment
17 that they might see, right, where that's going now be
18 a -- issue that trades off against upgrades.

19 And I think you were mentioning -- do I
20 recall from some prior discussions that -- that your
21 ability at that point when you apply volt watt
22 settings, you recommend them if get that far, your

1 ability to really say how much curtailment is going to
2 occur, that that's really something that's outside of
3 your ability to model right now, that you're kind of
4 like, well, this -- down, but we'll eventually --

5 MR. BUDD: Yeah.

6 MR. WARREN: Yeah. So that's -- so
7 that's something that I guess there's a little bit of
8 squish in there.

9 Let me ask you one other thing, then.
10 So, you know, going back to a comment you made a few
11 moments ago where the need for -- for any sort of
12 voltage control setting on the larger system would
13 depend on whether that particular circuit now need
14 then with the additional, you know -- coming on, the
15 additional system coming on. There's one thing I'm
16 still not clear about from our prior discussion.

17 Pepco has selected for its default
18 setting regime volt bar settings. And I presume that
19 the -- the reason you selected that was that's going
20 to provide the most -- the best improvement to hosting
21 capacity on your circuits if you can rely on all of
22 those systems to be following volt markers. Yet, when

1 you get to these larger systems, your default approach
2 is not to use volt bar settings. It's to use power
3 factor one if there's -- if you don't see an initial
4 problem, and then maybe set power factors are your
5 first -- you know, your first approach.

6 I guess I'm -- I'm just wondering, are
7 you -- are you really -- are you satisfied that the
8 overall hosting capacity of your system is being
9 maximized through your approach to these larger
10 systems, like not -- not going straight to volt bar at
11 first. Because I thought you had mentioned at one
12 point, John, that this was a question of these
13 large -- a volt bar setting sort of being -- creating
14 more complications than benefits for your voltage
15 control at upper larger systems. So I wonder if you
16 can kind of review that whole issue again for us.

17 MR. BUDD: Sure. So there's just a lot
18 of stuff there. I'll try and unpack it. So to start,
19 when we're doing our site-specific settings, you know,
20 we're -- we're considering liability and safety system
21 first. Second is trying to minimize potential
22 opportunity for curtailment of energy, especially if

1 you don't have to do it. Then secondary to all that
2 is trying to -- capacity. So -- capacity is sort of
3 last on our list of priorities.

4 Now, to your comment about the default,
5 right, when that default was designed,
6 there -- there's some expectation that, okay, if all
7 of our customers theoretically adopted, or let's say
8 the bulk of them, 60 percent of the feeder, right,
9 they're just naturally going to be spread over the
10 whole feeder. We call that a diversified load.

11 So that -- that's kind of what we're
12 getting at when we -- we think of the default setting.
13 We -- we think it's going to be spread out over the
14 whole feeder. It's not going to be lumped in one
15 specific area where it could cause a problem, because
16 it's just a huge injection of megawatts or -- or VARs;
17 right? And, then, so that's where we have to take our
18 approach of testing all our different site-specific
19 settings, using our factor of -- potentially volt-VAR,
20 volt watt, potentially all of them, potentially only a
21 few of them; right?

22 And so we go through that process of

1 looking at, okay, from not only safety, let's do our
2 best to try and not cause a customer to lose energy,
3 especially if it's not needed. If we can get them
4 interconnected reliably and safely without interfering
5 with stuff like capacitors and regulators, that's the
6 way to go.

7 I think that answers your question,
8 does it not, or do you want me to elaborate?

9 MR. WARREN: No, I think it does, John,
10 thanks. I think that's just a -- I think it's kind of
11 a material thing that -- that at least I feel I've
12 learned in this -- in this process, in these
13 discussions, is that -- that there's a lot of -- there
14 is a lot of complexity to which inverter settings you
15 want to use, depending on the location and the
16 magnitude of some of these larger resources.

17 The fact that increasing hosting
18 capacity is -- is sort of relegated to, like, the
19 third most important thing when you're doing this, you
20 know, you kind of have your -- obviously your system
21 reliability concerns are -- are primary. Is the thing
22 going to work right?

1 The issue of -- of trying to minimize
2 curtailment, I mean, really, unless we're moving over
3 into volt watt, we're not really -- constant power
4 factors versus Volt-VAR curves, we're not -- we're not
5 really expecting that the current limitations of
6 the -- of the inverters are going to come into play
7 that much until we go there.

8 So I guess maybe I would just think
9 it's maybe an issue for a little bit of thought as
10 we -- as we go into the future of, are we making sure
11 that we are squeezing out all the hosting capacity on
12 these circuits we can, you know, and that we're
13 not -- we're not giving anything up; right? I mean we
14 know that we've given up a lot of hosting capacity
15 today because we didn't have smart inverters.
16 Everything -- everything out there is power factor
17 one, and we're not getting anything out that. So just
18 to make sure that we do feel we're getting the most we
19 can out of the approach. Thanks.

20 MR. EDMONDS: All right. Thank you.

21 Let's move to Mr. Bertuzzi. And please
22 spell your last name and the -- identify the

1 organization you're with for the stenographer.

2 Gentlemen, have you -- gentlemen, when
3 you answer, make sure that you spell your last name as
4 well for her. Thank you.

5 Mr. Bertuzzi?

6 MR. BERTUZZI: Sure, yeah. It's Jack
7 Bertuzzi, B-E-R-T-U-Z-Z-I. I'm with Ecogy Energy.
8 And my question for Pepco is when Pepco is going
9 through their feeder and sort of power flow analysis
10 for an application, do they -- are they just looking
11 at that application associated with that single site,
12 or are they considering other sites on that feeder
13 that may already have this advanced inverter settings
14 deployed, and the ability for those multiple sites,
15 you know, to respond in unison together, if that
16 question make sense.

17 MR. BUDD: This is John Budd, J-O-H-N,
18 B-U-D-D, from Pepco Holdings. So to respond to your
19 question, when we perform that analysis for these
20 site-specific converters, we do consider other sites
21 on the feeder as well. So if there are other
22 inverters, essentially large inverters that have, say,

1 their own Volt-VAR or volt watt curves, and there is
2 potential that we would have to study them in order,
3 so -- so who got there first with their respective
4 recommended site-specific settings.

5 MR. BERTUZZI: And I guess to follow up
6 with that, if they don't have existing settings, has
7 there been a contemplation of retrofitting those
8 existing sites via a gateway or, you know, if those
9 existing sites actually have smart inverters already
10 deployed, to be able to, again, sort of, you know, act
11 across the system in unison rather than -- than just
12 sort of be static as it currently is interconnected?

13 MR. BUDD: So it depends on our
14 interconnection agreement with those specific
15 customers. But I do believe with some of our legacy
16 interconnection agreements, there is a provision that
17 requires the customer to allow Pepco to alter the
18 power factor of the customer's inverter,
19 should -- yeah, should there be impacts that are
20 identified by Pepco in -- in, I don't want to say real
21 time, but should we receive -- should we identify
22 impacts that maybe were being caused in a diversion

1 situation, we could go back and alter power factors.

2 And that really comes back to the idea
3 of, I think, power factor's schedule. Sometimes that
4 schedule might be specified for what we call off peak
5 versus on peak, and those costs of the lowest peak
6 periods get shifted around, and -- and it needs to be
7 changed.

8 MR. BERTUZZI: Okay. Thank you for
9 that.

10 And, then, I guess just for -- for the
11 final question there, when we're talking about
12 systemwide upgrades associated with the increasing
13 hosting capacity and the cost associated with it, has
14 there been a consideration as sort of an alternative
15 of doing what it -- what was just proposed instead of
16 upgrading, you know, the -- the actual feeder system
17 going back to the existing interconnecting systems,
18 retrofitting those -- those existing systems to
19 comply, and potentially compensating those existing
20 systems if there's curtailment as a -- you know, as a
21 much cheaper alternative than, you know, upgrading a
22 substation, for example.

1 MR. ADEYEMO: Kunle Adeyemo, last name,
2 A-D-E-Y-E, M as in Mary, O.

3 I think that this is definitely a
4 complicated question. It's a legal question that
5 require us going back to every single customer that's
6 already on the system. Some parties may agree; some
7 parties may not. The -- the terms that I think
8 Mr. Budd was just referencing are talking about the
9 service situations where it would cause impacts to our
10 system. And I think that it would be complicated,
11 because not everyone would -- would be comfortable
12 with having a potential curtailment to their system
13 when they -- when their system would end. And under
14 certain parameters, under certain situations, and
15 because people want to come on the system later may
16 not be justification for them to potentially being
17 subject to curtailment.

18 So while -- while it's a potential
19 option, it's not one that would be easily done, and I
20 can't say that it would be necessarily cheaper,
21 because we don't really know what the up-cost going
22 back where we have to compensate or give all those

1 contracts would be.

2 MR. BERTUZZI: Yeah, I think
3 that's -- that's a very fair point. I mean -- but
4 potentially with considering essentially -- and it
5 wouldn't necessarily need to be every single
6 interconnecting customer, maybe just, you know,
7 the -- the top ten on that feeder, for example. But,
8 yeah, appreciate that -- that insight and feedback.
9 Thank you.

10 MR. EDMONDS: All right. We're going
11 to turn to Ms. Ward.

12 We can't hear you if you're speaking.

13 MS. WARD: Hello. Good morning,
14 everyone. My name is Laura, and my last name is Ward,
15 W-A-R-D, with the Department of Energy and
16 Environment. And I have a question related to the
17 analytics. And so are you -- or planning
18 to -- benchmarking test for inverters on a weak grip?
19 I'm asking that, because I consider this is essential
20 for understanding the behavior under challenging
21 conditions, ensuring compliance with regulations, and
22 improving us with an older system reliability. So I

1 would like to know that.

2 MR. BUDD: We don't have any plans to
3 do a benchmark test, but it's an interesting thought.
4 Maybe you could elaborate on how that would perform,
5 and I'd be interested to hear how you'd perform that.

6 I assume you're talking about on the
7 actual grid using, you know, let's say one of our
8 customers to perform a benchmark test?

9 MS. WARD: All right. Yeah, yeah. I
10 can collaborate on anything that you need related to
11 this work.

12 MR. BERTUZZI: Well, I think -- I
13 think, Laura, he's asking, like, for you to elaborate
14 on how you could do the -- the benchmarking test, but
15 yeah. Do you have, like, a -- like, a method of how
16 you would do it?

17 MS. WARD: Yeah, yeah, yeah. I -- I
18 have a methodology to conduct these kind of studies.
19 It helps to prepare both the method technology and
20 the -- infrastructure for future demands, as we
21 know -- in places. So, yeah, I can support the group
22 with the methodology to include these and --

1 MR. BARTHOLOMEW: Yeah. And --

2 MR. EDMONDS: Hold on -- hold on a
3 second.

4 MR. BARTHOLOMEW: -- do you --

5 MR. EDMONDS: Hold on a second. Hold
6 on a second, Mr. Bartholomew. Please identify
7 yourself for the stenographer. I know you've been
8 speaking, but she didn't catch who you were. So could
9 you identify yourself?

10 MR. BARTHOLOMEW: Yes, Thomas -- yeah,
11 I'll go ahead and do that. Thomas Bartholomew,
12 B-A-R-T-H-O-L-O, M as in Mary, E-W, the Department of
13 Energy and -- and if -- if Pepco would want to explore
14 this further, we're happy to, as Laura said, offer the
15 methodology, and, you know --

16 MS. WARD: Yeah, absolutely.

17 MR. BARTHOLOMEW: -- I'll figure out
18 how we can -- how we can actually make this happen.

19 MR. EDMONDS: All right. Thank you.

20 MS. WARD: Thank you.

21 MR. EDMONDS: I'm going to turn to
22 Mr. Lydic.

1 MR. LYDIC: Hi, this is Brian Lydic,
2 B-R-I-A-N, L-Y-D-I-C, with Interstate Renewable Energy
3 Council, or IREC.

4 Just going back to what Tasha presented
5 on the -- on the volt watt function, I noticed some
6 settings. I don't know if this was just -- I don't
7 know if these were actual settings that might have
8 been used at some point, but I noticed there -- there
9 were volt watt settings going down to 1.03 per unit.
10 And just curious if -- if that's something that's been
11 actually looked at and/or used in the past, if you
12 know. I -- I think 1547 the -- the adjustable ranges
13 goes -- go down to 1.05, but manufacturers may offer a
14 greater range that might make it more usable for
15 something akin to, like, a flexible interconnection
16 solution where voltage is the prevailing constraint.

17 MR. BUDD: So it's something we would
18 consider, but I don't believe we've actually had a use
19 case -- well, we haven't actually formally issued a
20 setting along those lines yet, but the rationale is
21 what you just said, where it's more like
22 a -- indicative -- like it says, limited export

1 flexible reduction. It's like a voltage-type scenario
2 where you're trying to prevent the customer from
3 causing the voltage to exceed 105 per unit, which is
4 the NC standard we've been talking about for the last
5 few meetings.

6 MR. LYDIC: Yeah, thanks. And -- and
7 just one quick, unrelated question, is just how do
8 you -- it sounds like you keep these settings
9 when -- when a site -- as site-specific settings that
10 those settings are reflected in your model or your
11 GIS. And just -- just curious to -- to ensure that,
12 you know, those settings are -- are then carried
13 forward for -- for other studies as well, you know,
14 potentially for planning purposes. Just wanted to
15 hear if there -- if you had experienced any issues
16 in -- in terms of keeping those settings, or if that's
17 already kind of baked into your processes.

18 MR. BUDD: Tracking the settings is a
19 challenge. There's no formal repository. I sort of
20 touched on how they're tracked on an application-by-
21 application basis towards the end of the presentation.
22 There's not really a -- like a data -- type repository

1 where the settings are stored at this time.

2 MR. LYDIC: Yeah, I got you. Thanks.

3 MR. EDMONDS: Okay. I will acknowledge
4 I forgot to read this, something that Mr. Lydic typed
5 in the chat during the conversation between
6 Mr. Bartholomew and Mr. Budd, and I'll read it. This
7 is, I think, what Thomas might be pointing to, is the
8 idea of proactive hosting capacity planning as part of
9 DC's part of the DSP, or distribution system planning
10 process. DC is operating under the current structure
11 of interconnection across -- were things to look into,
12 but that's not about -- that's talking about changing
13 the existing interconnection model. And the response,
14 Rosemary responded, "Agree. That looks like a topic
15 that's coming up with -- PHI conference."

16 And then Ms. Dodge, Jack Bertuzzi's
17 final point -- Pepco PHI response is pre-existing
18 agreements suggest possible rule making going forward
19 about new agreements versus retroactive."

20 I just wanted to make sure we had that
21 for the -- in the transcript.

22 I'll turn now to Mr. Warren.

1 THE REPORTER: Excuse me.

2 MR. WARREN: Yeah, thanks again --

3 MR. EDMONDS: Well, hold on a second.

4 Hold on a second. Hold on a second.

5 What?

6 THE REPORTER: I couldn't hear what you
7 quoted Rosemary as saying.

8 MR. EDMONDS: Okay. I'll read again.

9 THE REPORTER: Yes.

10 MR. EDMONDS: Rosemary, "Agreed. That
11 looks like a topic that is coming up in the FC 1050
12 technical conference."

13 Okay. Mr. Warren?

14 MR. WARREN: Hey, thanks, Brian. Yeah,
15 again, Harry Warren, W-A-R-R-E-N, from the Center for
16 Renewables Integration.

17 Hey, I just wanted to circle back.

18 The -- the 250 kilowatt sort of threshold there, so do
19 I understand that correctly that any system that is
20 over that size, you will be going through your site-
21 specific setting process, but do you also use the same
22 process for any smaller system where there is a

1 violation that's identified under the default
2 settings, and then you go through the same process to
3 find out how to reduce their interconnection costs?

4 MR. BUDD: So to the first part of your
5 question, yes. Anything above -- equals -- goes
6 through that process.

7 For the second part of your question,
8 will these smaller interconnections, when they do
9 their power flow on the secondary only, they already
10 assume the default; right? They -- they study
11 the -- default; right? And so if there is a cost
12 that's caused by an impact to our system, it -- the
13 default would've already been accounted for.

14 MR. WARREN: So --

15 MS. BECKHAM: I guess put differently,
16 site-specific settings are used for 250 KW and above,
17 and the amount of live to systems below that.

18 MR. WARREN: So if you have a smaller
19 system and the default settings which are somewhere in
20 your -- one of the variants of the Volt-VAR curve,
21 right, which is step 2 of the site-specific hierarchy,
22 you're saying that you would not as a matter of course

1 look at applying volt watt settings or adjusting the
2 Volt-VAR settings for those smaller systems to try to
3 achieve -- to try to resolve those -- to try to
4 resolve the violations.

5 MR. BUDD: Yes.

6 MR. WARREN: So I think -- I think
7 that's just something that -- you know, I don't know.
8 I mean I think that's something that -- there may need
9 to be some dialogue with the industry on that. I -- I
10 don't know if you have any statistics for us
11 that -- how many smaller systems are being
12 caused -- you know, are there upgrades, and could any
13 of those be resolved through -- through inverter
14 settings or some of these other approaches.
15 That -- that would be useful information to have to
16 find out if there's some missed opportunities for
17 using inverter settings to, you know -- to benefit
18 those systems as well.

19 Is there some reason technically, John,
20 why that would be a problem or ...

21 MS. BECKHAM: Sorry, I know -- I know
22 you're asking John, but I'm checking -- I'm jumping

1 in -- oh, I'm sorry. Taylor Beckham, assistant
2 general counsel for Pepco Holdings, B-E-C-K-H-A-M.

3 So I think to your point, we -- we are
4 not -- I don't -- or I would say we don't have that
5 tracking in terms of where there's been distribution
6 system upgrades that site-specific settings could've
7 been applied to that would've mitigated those
8 distribution system's upgrades or the need, right, for
9 distribution system upgrades.

10 I will say kind of practically, you
11 know, there are -- the team gets a number of
12 interconnection applications that come through the
13 door, and has a very limited time to evaluate those
14 applications, based off the regulatory timelines.

15 So in putting together default
16 settings, that's just kind of the reason why they were
17 default; right? When you are dealing with a large
18 volume of applications, you create the default
19 settings to try and facilitate application review and
20 technical review and, you know, processing of
21 applications. But at the same time, to do site-
22 specific settings -- a site-specific setting analysis

1 for each and every application that comes through the
2 door that may have distribution system upgrades, from
3 an ordinary course of business, Pepco has elected to
4 use this 250 KW threshold for when it will go through
5 that site-specific -- site-specific analysis.

6 MR. WARREN: Yep. Well if I -- if I
7 could just say respectfully, you know, Taylor, I do
8 think that this particular working group and the
9 interconnection working group more broadly, two
10 things: A, we -- I believe -- you know, I -- we're
11 not asking you a conditional question, but it's like I
12 think Pepco should be providing us with the
13 information it has on how many interconnections
14 since -- since these -- since these -- settings have
15 been adopted now a year and a half ago; right? How
16 many systems are we seeing that are being asked to
17 upgrade, and what are those costs? You -- you have
18 all that data. We're not asking any conditional
19 questions. It's just history.

20 In these -- you know, and then -- and
21 then I think people will be in a position to say is
22 Pepco's decision about its resource allocation to

1 minimize interconnection costs and maximize hosting
2 capacity, is it an appropriate resource location?

3 I mean if I heard you, Taylor, you
4 said, you know, Pepco has made a decision about where
5 that cutoff is and which systems you look at and which
6 you don't. But I think that's exactly the information
7 and the decision -- kind of review that should be the
8 grist, if you will, of -- of this working group and
9 this process, is to see, okay, is -- is the industry
10 and the Commission and everybody comfortable with that
11 approach? We can't tell if we're comfortable except
12 anecdotally unless you -- you give us that
13 information. And I -- I've got to believe that's
14 pretty simple information to tabulate.

15 MS. BECKHAM: We can get back to you
16 about this request in terms of data. I don't -- I
17 don't know that it's always as easy as hitting a
18 button and being able to provide it, but we can go
19 back and -- and look at that.

20 Regarding the conversations within this
21 work group, I certainly think that they are worthy
22 conversations to be had regarding resource allocation.

1 But, remember, Pepco is the operator of the system,
2 and Pepco's primary goal is to maintain safety and
3 reliability of the system, as well as provide
4 and -- and process through the solar DER applications
5 that are coming in. So we have a balance that we have
6 to take into account.

7 And so certainly hear your point,
8 Harry, and I think it's been -- it is a worthy
9 discussion. It is something that I think the working
10 group is a great place to have these discussion, but I
11 think, you know, it should be understood that Pepco
12 has to maintain an entire system, and so our, I would
13 say considerations are not just how do we get more DER
14 onto system. We have to consider a lot more factors.

15 MR. WARREN: Well, I hear you, Taylor,
16 but I mean I think the question I'm asking, though, is
17 not -- I realize that it's your responsibility to make
18 sure the system is safely designed and operating. But
19 whether -- but when you make a decision that says
20 you're not going to apply resources in your judgment
21 to doing analytics on DER connections that might be
22 beneficial in terms of increasing hosting capacity or

1 reducing interconnection costs, that's not really a
2 decision that's about safety and reliability. That's
3 a decision about what kind of resources are considered
4 prudent and reasonable by the Commission for you to
5 employ to help it achieve its solar deployment goals.
6 I think that's kind of different.

7 Not -- not asking you to back off on
8 safety and reliability, but, you know, you're saying
9 that, well, in order to meet all of your regulated
10 timelines and these sort of things, you only apply a
11 certain number of resources to that, and you create a
12 cutoff. I think we need the data to decide if we're
13 all comfortable and the Commission's comfortable with,
14 like, is that the right cutoff, or are we leaving too
15 much on the table?

16 MS. BECKHAM: I think you might have
17 reworked my words a bit there.

18 MR. WARREN: Okay.

19 MS. BECKHAM: There are -- in terms of
20 the data analytics and looking into number of
21 distribution system upgrades that we've had to have
22 since the default system -- or the default settings

1 were inputted into our process, we can -- I can -- we
2 can take that back and see if we can provide that
3 level of data analytics to this group.

4 And as the lawyer here, I don't want to
5 speak on behalf of the team that would have to be
6 putting that together, so that's why I'm saying we'll
7 take that back.

8 Regarding the default settings, like,
9 cutoff, that 250 cutoff, that is a -- it's within the
10 regulations that we are allowed to establish default
11 settings, and we may have site-specific settings.
12 Based off of the technical judgment that the team has
13 made, the decision has been that 250 KW and above
14 receives a site-specific analysis.

15 Now, I think -- and I'm -- if I'm
16 getting ready to twist your words, let me know. I
17 think what we can talk about is, yes, whether or not
18 250 is too high, if 200 -- I -- I don't think that
19 that's something that we would say we wouldn't want to
20 talk about. But I think the fact that we have created
21 a -- a set, like, a border in terms of 250 and above
22 gets site-specific and 250 below, that is within the

1 engineering judgment, technical judgment of Pepco as
2 the operators of the system.

3 And so, yes, there are considerations
4 related to if we're going to be doing site-specific
5 analysis for -- analyses for every single application
6 that comes in, certainly that may be. That's
7 something we have to take into consideration. And
8 so -- and that's the whole point of having default
9 settings and why the regulations have I think been
10 written the way that they are in terms of allowing for
11 Pepco to set default settings and then use site-
12 specific settings where it -- it deems that to be
13 appropriate.

14 MR. WARREN: Yeah, sorry, Taylor.
15 Maybe you didn't -- maybe I -- I didn't make myself
16 clear. The fact that Pepco feels that all systems
17 above 250 should receive a site-specific review
18 perfectly makes sense to me, if that's where you think
19 a reasonable cutoff is for that, and everything bigger
20 than that should be reviewed at that higher level. I
21 don't know that anybody has any kind of problem -- I
22 don't have problem with that personally. I don't know

1 why anybody would.

2 I think the question that I asked was,
3 if -- if systems smaller than that could benefit from
4 site-specific settings, are you using these same
5 analytics to offer -- offer that analysis
6 when -- not -- not for every system that comes through
7 the door, but whenever a violation is identified.
8 Because most of the systems that come through your
9 door, as John, I think, was describing, when the
10 sites -- when -- when the default settings are
11 applied, the analysis is done, the overwhelming
12 majority of your systems do not require any upgrades
13 to be done. The site-specific settings, so I take
14 care of the problem; everything is fine.

15 There's only a smaller number of
16 applications that trip over into a -- a violation
17 being identified. And then it's a question of, well,
18 when that happens, does Pepco automatically then also
19 look at site-specific settings, or do they do that on
20 request? Or I'm also hearing from you, well, no, we
21 don't do it at all. It's like then you just go
22 straight to your upgrade costs and don't get the

1 benefit of any further detailed review of site-
2 specific settings.

3 I think that's what I was hearing, and
4 that's where I think there may be some lost
5 opportunities for the community, if you will, in
6 saying, hey, you have this sophisticated process.
7 Maybe there's a hundred kilowatt system out there that
8 could benefit from that.

9 MS. BECKHAM: Understood. I think your
10 point has been made. We've made our point, yeah.

11 MR. WARREN: Thank you.

12 MR. ADEYEMO: It's Kunle Adeyemo, last
13 name, A-D-E-Y-E-M-O, attorney, Pepco.

14 I -- and I think that you brought this
15 up, Mr. Warren. I think it is important that we do
16 realize that the applications that -- that we are
17 talking about are a very small subset of all the
18 applications we receive, and I think you did point out
19 that in 2024. And you in a 1050 docket we do have,
20 and will be enforced if we do file. And obviously if
21 you review that and there are additional data we know,
22 we should probably look at -- look at that as well.

1 While we approve 4,130 applications in
2 2024, so I don't want us to lose track of the fact
3 that Pepco is approving a very large amount of DER
4 interconnections in a given year. And while these are
5 very, very worthwhile conversations to have, we are
6 having conversations about a very small percentage of
7 interconnection requests in that field, the -- the
8 general people.

9 MR. WARREN: -- well, and --

10 MR. EDMONDS: All right. All right.
11 Hold on a second. Hold on a second. Hold on a
12 second. We have Ms. Ward. She has her hand up.

13 Ms. Ward?

14 MS. WARD: Oh, yeah. So this is Laura
15 Ward, W-A-R-D, the DOEE. And, yeah, so I just wanted
16 to ask if -- could you -- would you prefer that I
17 explain the methodology or provide -- methodology for
18 that benchmarking that I mentioned before the previous
19 question during this meeting, or should we send a
20 follow-up -- relating to the terminology for that
21 consideration after the meeting?

22 MR. EDMONDS: My preference is that you

1 circulate it to the group, and then certainly Pepco
2 will note that it needs to respond to it. But I'd
3 like for that to be part of the record for this group,
4 if you could do that, please.

5 MS. WARD: Okay. Great. Thank you so
6 much.

7 MR. EDMONDS: Thank you much.
8 Appreciate it.

9 Mr. Bartholomew?

10 MR. BARTHOLOMEW: Thank you.

11 I was just going to follow up a little
12 bit on what the discussion that was occurring that
13 Harry brought up, is that a number of the -- the
14 safety and reliability upgrades that Pepco did over
15 the years have also been, I don't know, sporadic as
16 improving hosting capacity and performance for DERs,
17 you know, the capital grid project. Talked about that
18 and -- in detail. And so I think -- in some ways I
19 think what Harry and we are asking for is sort of like
20 the -- the dividend on those -- on those original
21 claims from the projects that were implemented. So I
22 think -- I think that's -- it's just, you know, okay,

1 the -- the system is said to be increasing hosting
2 capacity and performance, and, you know,
3 let's -- let's see it. So I think -- I think that's
4 part of it, too, is that while there may be a -- a set
5 of priorities, there's also multiple things that were
6 discussed and delivered. So that's -- that's part of
7 what the data, I think is --

8 MR. EDMONDS: So let me -- let me
9 interject, because we've been talking about this for a
10 while now, and I want to take a break after
11 Mr. LaFrance asks his question. But is it possible
12 that we could have a little bit more in-depth
13 discussion about this when we talk about hosting
14 capacity in the technical conference? You know, I
15 think we're kind of lulling back and forth, and I know
16 that, you know, the settings is going to be something
17 that will come back at that point. But it seems like
18 we -- we're struggling, and I'd like to see whether or
19 not we could land this, you know, there.

20 MS. BECKHAM: Yeah.

21 MR. EDMONDS: With more in-depth
22 discussion, and have -- propose the questions that it

1 wants the company to ask -- answer on that particular
2 subject. I'm not saying that any of the subjects are
3 off limits, but I'm just trying to shuttle things
4 around here.

5 MS. BECKHAM: Yeah, I think -- I think
6 your point is -- is well taken, especially in terms of
7 all of this all kind of runs together anyway, and to
8 the extent that there are questions related to the
9 distribution system upgrade, its -- and their impact
10 on hosting capacity, overall host system, that
11 probably would be better fit for that topic.

12 MR. EDMONDS: Yeah, I'm -- I'm not
13 suggesting, and I want this to be clear to those who
14 have been asking questions and getting answers from
15 Pepco. I'm not suggesting that -- that any of these
16 questions are not valid. They just may not be
17 directly pertaining to the subject that we're here to
18 talk about today. They may have some indirect
19 connection. And what I want to do is I want to make
20 sure everybody gets an opportunity to ask the specific
21 questions -- and I've been kind of jotting down some
22 things, but I'm missing some things along the

1 line -- and have those questions answered.

2 And I know if you've been in the Formal
3 Case 1050 Technical Conference, you know, the hosting
4 capacity analysis is one of the subjects that is on
5 the agenda to be talked about at some point later in
6 the year. And I just want to -- I just kind of want
7 to make sure that we set aside the appropriate amount
8 of time to have people to answer their
9 questions -- ask their questions and answer them.

10 I will say this, though. There is a
11 separate proceeding, and I think this was mentioned in
12 Mr. Lydic's response in the chat that I read. There
13 is a separate proceeding, Formal Case 1182. For those
14 of you that may not be familiar, it is a case that the
15 Commission opened in November of last year. It is
16 titled In the Matter of the Investigations and the
17 Implementation of Integrated Distribution System
18 Planning for Electric Utilities.

19 And so some of these things that we are
20 talking about today and we'll be talking about in the
21 technical conference might find themselves as relevant
22 in that proceeding as well. The Commission had asked

1 for comments on the notice of inquiry that it issued
2 in November where your comments have come in, and I
3 believe we're going through those comments so that we
4 can see where next steps are.

5 But I want to make sure that people are
6 aware of that proceeding, and if you're not, you might
7 want to, you know, go to the Commission's -- the e-
8 docket to take a look at it to see what the Commission
9 is thinking with respect to system planning.

10 So I'm going to take Mr. LaFrance's
11 call -- not call, his question. I'm sorry. And I'm
12 going to pause and give us all a chance to catch our
13 breath, and then we have a couple questions in the
14 queue. Mr. Bartholomew and I think Mr. Dodge had a
15 question.

16 So, Mr. LaFrance?

17 MR. LAFRANCE: Thank you. My name is
18 Albert LaFrance. That's spelled L-A-F-R-A-N-C-E. I'm
19 with Solar Solution in Washington DC.

20 My question is regarding potential
21 curtailment using -- utilizing volt watt controls. I
22 noticed in the -- the operational requirements

1 document that Pepco -- the current edition that Pepco
2 is utilizing, there is a clause which can be activated
3 by -- by Pepco checking a box, and it currently -- I
4 haven't seen it being activated, but it's a
5 requirement for the customer to compile and report to
6 Pepco the -- and I don't know the exact wording, but
7 it's reporting regarding the amount of curtailment
8 that had occurred from the inverter settings. And
9 was -- was wondering if -- I guess first of all if
10 Pepco has actually implemented that in any
11 interconnection agreements, and what the -- the
12 purpose of that is, and also whether it's investigated
13 as to how advanced inverters can provide that -- that
14 data. So that was just a general question about
15 the -- the -- that particular requirement.

16 MR. BUDD: We have not required it yet,
17 but in the other -- I don't think we've required it in
18 other jurisdictions as well. But in some
19 jurisdictions they're a reporting requirement. It's
20 just something that we want the customer to track, so
21 if there is some high risk of losing a lot of energy
22 that it's being tracked on a -- think it's a monthly

1 basis, I'm not mistaken. But we have not actually
2 required that yet, but it's in there as a potential
3 requirement if that reporting is needed.

4 MR. LAFRANCE: Okay. Yeah, thank you.
5 Maybe -- and this might be something that maybe
6 Mr. Lydic or someone else who's familiar with the
7 details of the advanced inverters to address, is
8 whether that is a -- that data can be gathered by
9 the -- inherently by the inverter, or whether some
10 external monitoring, for example, a weather station
11 would be required to -- to determine what the
12 potential production is at any given moment for
13 comparison with what is actually being produced under
14 curtailment by the inverter.

15 So that -- that is just another aspect
16 to -- to look at.

17 MR. EDMONDS: All right. Thank you.

18 We're going to go to Mr. Bartholomew,
19 and then we are going to take a five-minute break
20 after he gives his response.

21 Mr. Bartholomew?

22 MS. DODGE: Brian, sorry for

1 interrupting.

2 MR. EDMONDS: Oh, yeah.

3 MS. DODGE: Nina Dodge.

4 I heard a request for -- can we hear
5 from Brian Lydic to see if he can answer the question
6 that John couldn't, just to -- to make sure we close
7 out on -- on Albert LaFrance's questions just now?

8 MR. EDMONDS: Absolutely.

9 Mr. Lydic, do you have a response?

10 MR. LYDIC: Yeah. Brian Lydic, IREC.

11 Yeah, the -- you wouldn't necessarily
12 know, yeah, what the actual curtailment amount was,
13 energy loss would be, because the -- the inverter just
14 does the -- does the curtailment. And -- as Albert
15 referred to, unless you have, like, instrumentation on
16 your -- on your array to estimate what the power
17 available could've been, then you don't really know
18 how much would've been lost. So -- and -- and most
19 systems are not going to have that instrumentation.

20 But, yeah, the way it's been tracked in
21 California and Hawaii is just a -- a metric that
22 assumes that the system would be at 100 percent output

1 power otherwise. So it overestimates the potential
2 loss curtailment. It -- it does constrain the hours
3 of the day, you know, at which it -- it evaluate that
4 potential loss based on the voltages. So, yeah, you
5 can do that. If -- if you've got available voltage
6 data such as through the AMI, then you just assume
7 100 percent output otherwise, and based on the volt
8 watt curve that would be implemented, then you can
9 figure out what the summation of energy losses would
10 be throughout the day, or, you know, maximum energy
11 losses, assuming 100 percent output.

12 MR. EDMONDS: Is that helpful,
13 Mr. LaFrance?

14 MR. LAFRANCE: Yes, it is. Thank you.

15 MR. EDMONDS: Okay. Great.

16 All right. Mr. Bartholomew, and then
17 we'll take a break.

18 MR. BARTHOLOMEW: Yeah. So I was just
19 going to make a suggestion, which is that I think
20 as -- as Brian was just alluding to, a number of other
21 states have implemented advanced inverter technologies
22 and controls, you know, and I -- I think it might be

1 helpful for our next discussion on this topic to sort
2 of focus on what's going on there, and then maybe have
3 Pepco respond to those types of configurations and
4 what -- is that an issue with -- you know,
5 from -- from the differences -- between the -- the
6 system in DC and -- and those systems and what -- what
7 would have to be, you know -- or changed to -- to get
8 to that level of penetration and usage of the
9 technology, is the suggestion for that part.

10 I think in some ways the tricky part
11 for some of these conversations is -- is talking about
12 other things that get brought in that just have to do
13 with what -- currently it does in broader -- issues.
14 We might be able to look at -- specific examples.

15 MR. EDMONDS: All right. I wasn't at
16 the educational session when -- spoke, so I don't know
17 some of what you're talking about was discussed there.
18 I'll need to kind of defer to folks that were present,
19 because I wasn't there. But was any of that -- any of
20 the -- sort of the best practices, was that covered in
21 your presentation, Mr. Lydic?

22 MR. LYDIC: I'm trying to recall

1 exactly. Maybe -- Thomas, could you restate the
2 question really quick, because I missed part of it.

3 MR. BARTHOLOMEW: Well, it's not really
4 a -- it's not really a question. It's more of a
5 suggestion. I mean I think that Brian's presentation
6 did lay out, you know, a number of, like -- I would
7 say -- and, Brian, you can correct me if I'm wrong,
8 but I would describe it as sort like, you know, policy
9 recommendations, things that you could do from a
10 policy standpoint.

11 But I think that some of the
12 discussions today has been about local, you know,
13 issues or situations. And maybe we could talk through
14 these examples, like with just giving examples of how
15 other jurisdictions handle that, and
16 compare -- compare the issues that they ...

17 MR. EDMONDS: All right. So let me
18 look at what he has prepared, and -- and I'm going to
19 make a note of that. I'm not saying that it's not
20 something we should consider, but I just want to take
21 a look at it. And I wasn't here, so I don't know what
22 was covered, so I'll make a note of that for future

1 discussion --

2 MR. BARTHOLOMEW: Brian, did you want
3 to -- did you -- I don't know. I don't -- you can go
4 for it, I guess.

5 MR. LYDIC: Well, yeah. I mean I do
6 recall, I think, going over a lot of issues and how
7 California has handled them, and I think I addressed,
8 you know, Hawaii more recently in the other -- oh, I'm
9 sorry. I was thinking back to the December meeting,
10 where now we're thinking about just the other week?

11 MR. BARTHOLOMEW: Yeah, I think -- I
12 think, Brian, you were -- or somebody was talking
13 about the other meeting. But, yeah, anyways, yeah,
14 I -- I thought that maybe we could go back there,
15 because I think that -- that would be, like, what
16 Hawaii and California have done. I think if we could
17 get more of a direct discussions on, like, what is the
18 issue with implementing that and more -- more
19 discussion around that, that would be helpful.

20 And I think that sometimes the
21 discussion has gotten to stuff like, you know, other
22 policy considerations have been brought up, but -- to

1 be specific.

2 MS. DODGE: Can I interject
3 again -- Nina Dodge -- Brian?

4 MR. EDMONDS: Yeah, go ahead.

5 MS. DODGE: Yeah. One of the things
6 that came up on Hawaii and CA -- and California was
7 their use of volt watt, and -- and apparently the
8 very, very small number of curtailment that has
9 happened both in California and Hawaii in -- in their
10 use over time of volt watt. So it would be very good
11 to hear more about that at some point, maybe in
12 another educational section.

13 But I'm -- I'm eager to move on to
14 Albert LaFrance's presentation, so I'll stop my
15 questions for now.

16 MR. EDMONDS: All right. Well, we need
17 to take a little bit of a break, if you don't mind. I
18 know that we're actually close to the top of the hour.
19 We're going to be -- we're actually running a little
20 bit over, and I know, Ms. Dodge, you have a hard stop
21 at twelve, but I just need to give us all about five
22 minutes, if we can, just to catch our breath, and

1 we'll circle back at 11:46, and we will take a look at
2 Mr. LaFrance's proposals as well as the Maryland
3 regulations.

4 So let's go back at 11:46 full tank.

5 Thank you.

6 (Off the record.)

7 MR. EDMONDS: I just want to
8 acknowledge that there are a couple of comments in the
9 chat, and I will circle back to those at the end, so I
10 don't want you to think that I'm not looking at them.
11 I just want to get -- so Mr. LaFrance has sent us some
12 proposals to various provisions in the current
13 interconnection rules in chapter 40 of the Commissions
14 interconnection rules. And I'm going to pull up the
15 first one, and he can certainly describe what his
16 intentions are.

17 MR. LAFRANCE: Okay. Thanks very much.
18 Again, my -- my name is Albert LaFrance,
19 L-A-F-R-A-N-C-E, with Solar Solution.

20 Just to -- to preface this discussion,
21 these -- all these proposed changes are -- I tried to
22 keep them specifically related to advanced inverters.

1 Obviously, in the -- the technical conference, we're
2 dealing with broader issues, and there'll -- there'll
3 be more changes, but my hope would be that if we can
4 achieve some agreement on -- on these changes related
5 to advanced inverters, that those could just roll up
6 into any changes proposed out of the -- the other
7 proceeding.

8 So that being said, the -- first going
9 to -- to subsection E, default required inverter
10 settings profile under subsections 1 and 2, those
11 changes are pretty much just matters of style or -- or
12 wording and -- and I think just tighten up the -- the
13 wording a little bit. I -- they don't -- they're not
14 intended to alter the -- the intent of -- of
15 those -- those subsections.

16 If we go down to the -- what we are
17 asserting the -- the subsection F-1, again, it's just
18 the -- the change to that wording is just to -- to
19 tighten up -- it up a little bit.

20 Where we get into actual substantive
21 changes are in the -- the proposed subsection 2, which
22 is essentially requiring that the -- the utility

1 evaluate whether site-specific settings could reduce
2 or eliminate system upgrade costs, and if so, that
3 those settings would be proposed to the -- the
4 customer as an alternative at the -- at the time that
5 the cost estimate is -- is provided by the utility.

6 MR. EDMONDS: Could you pull the
7 microphone a little bit closer to you?

8 MR. LAFRANCE: Yeah, certainly.

9 MR. EDMONDS: Thank you.

10 MR. LAFRANCE: So that is -- that is
11 all we had in 40-02.

12 Should I just continue with the -- the
13 other sections?

14 MR. EDMONDS: Yeah, just give me -- you
15 can go ahead and start talking, although -- I'll pull
16 up the others --

17 MR. LAFRANCE: Okay. The next -- the
18 next section where I had proposed changes is 40-05,
19 and this is -- pertains to level 2 interconnection
20 reviews. And the -- the proposed change is in
21 40-05.2 -- I'm sorry, 40-05.4-D1. And there I'm
22 adding an explicit requirement that the -- that the

1 utility considered implementation of site-specific
2 inverter settings profile when system upgrades are
3 deemed necessary. So that -- that is a substantive
4 change in that it -- it mandates that
5 inverters -- site-specific inverters be considered.
6 So that is a -- a change from the -- the
7 current -- Pepco's current technical interconnection
8 requirements that, as John discussed previously, only
9 apply to systems over 250 kilowatts. So this
10 would -- would bring that down to -- to small systems.
11 And that is all I have for 40-05.

12 And then for 40-07, it's the exact same
13 change, additional wording applying to level 4
14 interconnection reviews, and, again, the same intent.

15 And then finally in 40-08.41, simply
16 adding a requirement that the utility maintain records
17 of site-specific settings profile set were issued, and
18 simply adding that to the list of information that the
19 utility has to maintain and -- and report on to the
20 Commission.

21 MR. EDMONDS: Okay. Thank you.

22 MR. LAFRANCE: So that is all I have.

1 MR. EDMONDS: Okay. Thank you.

2 Anybody have any comments or questions?

3 Obviously, you're not bound by your comments if the
4 Commission were to consider these as part of a formal
5 notice of proposal making, but anyone have any
6 comments or questions with regard to the proposals
7 that Mr. LaFrance has -- has provided us today?

8 MR. ADEYEMO: Kunle Adeyemo. I've
9 got -- I ask this with a lot of these proposals. Has
10 there been any thought to the cost implications
11 of -- of these? So if -- I don't know if we compare
12 DC application costs or things of that nature to the
13 other jurisdictions if these -- if these proposals
14 were adopted and that led to increased cost for each
15 application, would that be a better option than the
16 flat fee that we proposed in the small interconnection
17 space, or would this be less expensive if we have
18 to -- potentially hire third parties to do these
19 analyses because --

20 MR. LAFRANCE: Okay. That's -- that's
21 a very good point, and I -- I think the first thing I
22 would say regarding the site-specific settings is that

1 I would anticipate that they be an option
2 in -- regarding smaller systems, that they will not be
3 optional in a huge number of cases. So -- so that
4 itself is going to mitigate the overall cost.

5 And secondly, to your point about
6 comparing this potential cost versus the -- the flat
7 fee, I think that is a -- a really important point
8 that needs to be considered both, you know, in this
9 proceeding and in the -- the technical conference. If
10 the -- if -- if I could frame the issue, you know,
11 more broadly, there are really three potential means
12 available to mitigating the system upgrade cost to the
13 customer. The first one is the -- the flat fee that
14 Pepco is proposing. The second is what is implemented
15 in Maryland, which is the limited export agreement.
16 And then third is what we've been talking about here,
17 which is using advanced inverter settings,
18 specifically volt watt, to mitigate the overvolt
19 conditions.

20 And you know, one of -- one of the
21 factors that -- that should probably be considered in
22 looking at those three options -- and, again, I just

1 want to keep all of those three options on the -- on
2 the table, so we don't get, you know, narrow -- more
3 narrowly focused to the exclusion of the other
4 options.

5 One of the characteristics is where the
6 risk of curtailment would -- would go. So in -- in
7 the sense if -- if you go with the Pepco option, then
8 the \$280 fee relieves the -- the customer of the risk
9 of curtailment. With -- with volt watt controls, the
10 customer has some -- is taking on some risk, including
11 things that are not under the customer's control, like
12 the behavior of other systems, other DER systems that
13 are on the same secondary.

14 With the limited export agreement, that
15 is putting more of the risk on -- on Pepco, because
16 Pepco will come up with a -- a number and say, okay,
17 if you limit your export to this amount, you can
18 interconnect. And so if that number turns out to be
19 incorrect, then -- then the risk is of -- is more on
20 Pepco.

21 So anyway, this -- that, I think, is
22 the way to -- to frame it overall. But in terms of

1 the cost, I think that -- and my feeling is of what
2 would probably come out is -- is just an additional
3 items on the screen of these applications that would
4 pretty quickly indicate whether or not site-specific
5 settings are even a viable option. So I -- I think
6 that would -- would go to -- to mitigating the costs,
7 to -- to some extent.

8 MS. BECKHAM: I -- I kind of just had
9 an administrative question, but I like your -- the way
10 that you characterize it as the three different
11 options and looking at it from that perspective. I am
12 looking at it from the perspective of where is the
13 risk placed, and so I -- I do appreciate the way that
14 you laid that out.

15 Only -- what I was just going to
16 comment on was in I think what was sent out for the
17 changes for 40-02, there was an added J about -- yeah.

18 MR. LAFRANCE: Yeah, yeah.
19 You're -- you're right. You are correct, yeah. And,
20 yeah, it should -- I and J, and that was to require
21 that -- and -- and this, by the way, is -- is borrowed
22 from the Maryland regulations that would require the

1 default settings to be reviewed by the -- the
2 Commission, with the provision that if there was no
3 objection from the Commission that they would be
4 deemed approved.

5 MS. BECKHAM: In -- in that instance,
6 has there -- and maybe -- maybe Maryland has more of a
7 guide here. Has there been any indication where that
8 has held up interconnections because of the -- the
9 need to wait for Commission approval? And if -- you
10 know, has there been any consideration as to, you
11 know, how this interplays with the kind of, I don't
12 want to say request, but the competing interest in
13 getting solar more quickly added to the grid?

14 MR. LAFRANCE: Not that I'm aware of,
15 but I -- I don't have really much involvement or
16 experience with -- with Maryland interconnections. So
17 maybe someone else on the group could -- could address
18 that. But I -- the idea would be that the -- you
19 know, the applications would be reviewed under the
20 existing -- with the existing default settings, you
21 know, while we -- the proposed changes were being
22 considered. But I -- I tend to -- to -- your

1 question, I don't know whether that is an issue
2 in -- in Maryland or not.

3 MR. EDMONDS: All right. Mr. Warren?

4 MR. WARREN: Yeah, thanks, Brian.

5 Again, Harry Warren, W-A-R-R-E-N, with the Center for
6 Renewables Integration.

7 I might -- I think, Ms. Beckham, I may
8 be able to shed a little bit of light on that question
9 for Maryland. I don't know that -- I don't think the
10 utilities there have gone through any revision of
11 their default standards that would've required, you
12 know, them to submit those to the Commission again
13 for -- for sort of administrative review. But -- but
14 they did initially do that, you know.

15 That was one of the issues in -- in the
16 Maryland working group a long time ago, was that
17 the -- I believe that Pepco and all the other
18 utilities, you know, filed their default settings
19 profiles with the Commission, and I believe it was
20 just in their administrative docket. And then anybody
21 having seen those and the working group members having
22 received notice of that filing then had the

1 opportunity to decide whether they wanted to, you
2 know, comment on those in the administrative review,
3 you know, in their administrative meetings or not.

4 So we haven't -- we haven't wound up
5 with -- I don't think we've had a case
6 where -- against -- John, you might know. I
7 don't -- I don't think there's been any revisions
8 filed that -- that went through that administrative
9 review, that I recall, yeah.

10 MS. BECKHAM: I think John said none.

11 Okay. Thank you. I had another
12 followup, but I just forgot it, so if it occurs to me
13 again, I will bring it back up.

14 MR. EDMONDS: Any other comments,
15 questions for Mr. LaFrance's proposal? I think we're
16 going to obviously note these proposals. If possible,
17 we can --

18 MS. BECKHAM: Sorry. Taylor Beckham,
19 B-E-C-K-H-A-M. Given that Pepco already publishes the
20 inverter settings, its default inverter settings in
21 the technical and interconnection requirement already
22 on its website, and that this is kind of seen as just

1 like an administrative task or ask, what would really
2 be the -- or the difference between what Pepco is
3 already doing as opposed to requiring Commission
4 approval?

5 MR. LAFRANCE: Well, one difference
6 would be that that the -- the change in the default
7 settings would -- would actually be a -- a formal
8 filing with the Commission. So there would be more
9 notice of that as opposed to changes to the -- the
10 technical interconnection requirements, which
11 obviously are published, but there isn't the -- the
12 notice procedure that there would be with putting in a
13 formal filing.

14 MS. BECKHAM: So the -- the key is the
15 notice of upcoming changes to the DER? Is that
16 something that --

17 MR. LAFRANCE: That I think is one
18 the -- that, to me, would be one of the -- the
19 benefits of filing it. It would also provide an
20 opportunity for the Commission's technical staff
21 to -- to review the changes and potentially engage
22 with Pepco, you know, with the differing opinions on

1 what should be changed, so that there would be
2 the -- there would be more input into those changes
3 before they're actually implemented and -- and
4 published. Again, it just -- it's -- it's putting the
5 Commission technical staff into the -- into the loop
6 on -- on that process.

7 MR. EDMONDS: Okay. Mr. Warren?

8 MR. WARREN: Yeah, Brian. Sorry, Harry
9 Warren again from Center for Renewables Integration.
10 Again, I think maybe just to give a little background
11 and color on the Maryland, you know, approach there.
12 I think it -- it was the case that just the
13 opportunity for notice and comment by any of the
14 interested parties was why the Maryland process sort
15 of created that, something akin to the language
16 that -- that Albert's suggesting here for DC.

17 You know, I -- I think since I've been
18 involved with that working group since -- you know, I
19 had hair, which you can't see here, but I didn't
20 anymore, a long many years -- the -- I think in the
21 early going inverter setting questions, like, it
22 wasn't clear to the industry, for example, whether

1 volt watt settings might be put forward by utilities
2 as sort of a default type of setting, and therefore,
3 you know, a little more contentious discussion as to
4 what the default should be.

5 I think since Maryland and now DC, you
6 know, Pepco, all the Exelon utilities, Potomac Edison,
7 everyone sort of converged on Volt-VAR as like a
8 default approach. I don't think it's wound up to be
9 too contentious. You know, I don't think that
10 those -- those were discussed in the working group,
11 and then when they were brought forward, I really
12 don't think there was much comment there.

13 So at one level, where things are right
14 now, I don't think it invites much administrative, you
15 know -- like, I haven't seen a lot of concern
16 expressed in Maryland about anything. But I think to
17 kind of go back to Albert's point, just the
18 note -- the fact that there is a notice that these
19 things might change and folks have the opportunity to
20 comment, that it's just not strictly a unilateral
21 decision by the utilities. We certainly view it as
22 valuable in Maryland and may move down that road.

1 MR. EDMONDS: Thank you. I just want
2 to know something. I think it's worth noting, because
3 I'm looking at the Maryland regulations as it relates
4 to smart inverters, and reading the provision with
5 regard to Commission staff review and approval, and
6 unless I'm missing something, I don't see anything in
7 the current rules -- I got this thing in the middle of
8 the screen. I can't see -- that talks about comments.
9 And so maybe I'm missing something, Mr. Warren. I
10 don't know.

11 MR. WARREN: Oh, yeah, Brian, if I
12 could chime in. I -- I think I'm reading them here.
13 Let me scroll through and -- I've got them on a
14 slightly different platform than you've got here, but
15 let me see if I can get the numbers right.

16 MR. EDMONDS: All right.

17 MR. WARREN: It's down -- okay. So
18 smart inverters is section 0; right? Yeah, so I think
19 you're -- you're almost there. So let's see, 0, it
20 says here number 9, 0-9 is kind of where this all
21 starts, I think.

22 MR. EDMONDS: Right.

1 MR. WARREN: Right? So it said, you
2 know, larger utilities -- I think we're ruling out the
3 little munis; right? So they had to file initial
4 default required inverse settings profiles for
5 approval, right, initially, and then file -- and then
6 file any changes through which established default
7 utility required profiles for approval; right? So
8 that's 9-A and B. All right?

9 So I think that's where -- where this
10 basic kind of filing of the initial default settings
11 and further default settings for approval was sort of
12 in the regulations there; right?

13 MR. EDMONDS: Right.

14 MR. WARREN: And then I think it
15 went -- I think Albert -- I'll let him speak, but I
16 think he kind of borrowed some of this language;
17 right?

18 And then down, I think it is No. 11
19 where it says that utility required inverse setting
20 profile shall be deemed approved unless otherwise
21 directed by the Commission. So they didn't want to
22 hold up the approval if nobody had anything to say.

1 Does that makes sense? Does that
2 clarify it for you, Brian?

3 MR. EDMONDS: Yeah, thank you. I just
4 want to make sure that we're on the same page. That's
5 my understanding.

6 MR. WARREN: Yeah, so that's where it
7 is. So they just kind of put this in
8 the -- they -- there was an initial approval, changes
9 have to be filed for approval, but if nobody has
10 anything to say, they're just sort of deemed approved.

11 MR. EDMONDS: Right. Is this a little
12 bit different, though, than what you're proposing,
13 Mr. LaFrance?

14 MR. LAFRANCE: No. My -- my intention
15 was pretty much just to require --

16 MR. EDMONDS: -- the Commission --

17 MR. LAFRANCE: -- that
18 the -- the -- both changes be filed with the
19 Commission and then be deemed approved if -- if there
20 were no objections other than the 90 days. That was
21 my intent.

22 MR. EDMONDS: So I'm just trying to

1 make sure I understand this, and then I have to go
2 back to -- to your document again. What I'm trying to
3 get at is to whether or not you believe there should
4 be a period where the public can weigh in. But I
5 guess -- no. I guess what you're saying here in I and
6 J, this is consistent with Maryland.

7 MR. LAFRANCE: My -- my thinking was
8 that the -- that filing itself would -- would
9 essentially be the notice for --

10 MR. EDMONDS: Right. Okay. I got it.
11 Okay. Great, thank you. Appreciate it.

12 MS. BECKHAM: In Delaware, the settings
13 are filed, not -- and there's no requirement -- I'm
14 sorry. The -- the technical interconnection
15 requirement, which includes the settings, they're just
16 filed, which is similar to kind of what we do now in
17 terms of that being published. I think to your point
18 about the need for notice, that creates -- if it's
19 filed, that creates the need for notice. If we did
20 something similar for the settings, the smart inverter
21 settings default or site-specific, which obviously
22 site-specific settings aren't -- they're site

1 specific, so they're not --

2 UNIDENTIFIED SPEAKER: They're going to
3 be in that interconnection --

4 MS. BECKHAM: Yeah, yeah, yeah. Does
5 that get to where you would want in terms of the
6 notice?

7 MS. DODGE: I have a question from the
8 audience. The -- the woman who was just speaking
9 is -- comes up as A-V-O-I-T PSE staff. But from what
10 you just said, you certainly sound like PHI. So could
11 you just give us your name? I'm sorry about this.
12 I'm not -- I probably know you --

13 MS. BECKHAM: Taylor -- yeah, yeah,
14 Taylor Beckham, assistant general counsel for PHI.
15 Yeah, I think it's showing up that way because we're
16 in the room.

17 MR. EDMONDS: Yeah, so everybody was
18 speaking --

19 MS. DODGE: Yeah, well,
20 Taylor -- Taylor, you're also -- you're also on a
21 split screen, and so it's confusing, and I'm sorry I
22 couldn't recognize you just from the profile. Thank

1 you very much.

2 MR. EDMONDS: Yeah. For those of us
3 who are in the room that actually are logged in, our
4 mics are muted on our computer, so you can't hear us
5 from the computer. Otherwise you'd hear us twice.
6 So, yeah, it's -- it's Taylor. I promise you it's
7 Taylor.

8 MS. DODGE: Yeah, thank you.

9 MR. EDMONDS: Go ahead, Taylor.

10 MR. LAFRANCE: So I -- I think on that
11 question, I would sort of defer to someone you has
12 more expertise on -- on Commission procedures as to,
13 you know, whether a filing is -- is considered to
14 be -- you know, is considered to be notice or whether
15 something -- something else needs to be published.
16 But that was -- just generally, the idea was to -- to
17 open up the -- the proposed changes for both internal
18 review by -- by Commission's professional staff and by
19 other interested parties. So if -- if there is some
20 better wording to that, certainly I'd defer to that.

21 MR. EDMONDS: Generally, if something
22 is filed, that does give notice that the filing was

1 made, especially if it was made pursuant to a rule or
2 a Commission order. That's sort of how that works.
3 But I don't want to comment specifically on the
4 language. Obviously, my questions were just to get
5 clarity, you know, to weigh in one way -- one way or
6 the other, because this might be something the
7 Commission will take up, and I don't want to prejudge
8 what the Commission will do.

9 All right. Ms. Ward and then
10 Mr. Warren.

11 You're muted, Ms. Ward, if you're
12 speaking.

13 MS. WARD: Yeah, so sorry. I already
14 got the point with my question. Thank you.

15 MR. EDMONDS: Go ahead. Go ahead. Oh,
16 you -- you're fine.

17 MS. WARD: Mm-hmm, I'm fine.

18 MR. EDMONDS: Okay. Mr. Warren?

19 MR. WARREN: Yeah, again, Harry Warren,
20 Center for Renewables Integration.

21 Hey, Brian, I was wondering, could you
22 maybe help us with a little point of Commission

1 procedure on this one? So in Maryland when these kind
2 of filings are made pursuant to a regulation like
3 this, okay, you know, the -- the utility says we want
4 to file an update for these settings, the -- that kind
5 of filing tends to be placed on the Maryland
6 Commission's administrative docket; right? And then
7 every Wednesday they have an administrative meeting
8 where those -- those items are sort of queued up;
9 right? And I think it's the -- I think it might be
10 the responsibility of the Commission staff there to
11 get those various items queued up on that docket.

12 In -- in the district, if -- if Pepco
13 were to make a filing saying we're going to update
14 our -- our default settings, you know, and pursuant to
15 this provision of the regulations were filing those,
16 does -- does DC have a parallel kind of administrative
17 docket process? How is it that the Commission would
18 then, like, kind of execute its approval of that
19 filing?

20 MR. EDMONDS: Right. So that's
21 a -- that's a good question. It -- my -- my initial
22 reaction is that it depends, and it depends primarily

1 on whatever Commission order or -- or regulation,
2 statute or regulation that may apply to the situation.

3 But I want to answer your
4 administrative docket question. We don't have an
5 administrative docket like in Maryland. So if -- just
6 by way of example, if we were to use the language that
7 Mr. LaFrance proposed and sort of a self-executing
8 subject to Commissioner approval, but if not it's
9 deemed approved, then there would be nothing that
10 would need to happen, because the rule says that if
11 the Commission doesn't take any action, then it's
12 approved.

13 And there may be some current situation
14 where that exists. I just -- none come to mind as I
15 was thinking about your question. I can't come up
16 with an example of something, or maybe Pepco has one.
17 I don't know.

18 But -- but it really does depend on
19 what drives the filing. If the company -- say, for
20 instance, in this instance, one of the reasons why
21 we're -- we're going to -- the technical conference is
22 the company asked for a change in tariff. That

1 requires, you know, a whole process where we
2 get -- you know, we notice that the -- that the tariff
3 proposal has been filed, and we ask for comments on
4 the tariff proposal, and then the Commission will
5 decide how it wants to proceed. That's normally how
6 things are done. So if the company wants to do
7 something that it has to, you know, propose what it
8 wants to do, and normally the Commission will say,
9 "Well, what does everybody else think about it?" And
10 then we'll see comment and -- and go there.

11 So that's -- that's about as good an
12 answer as I can give you for now. I think -- I think
13 the initial would be it depends. And I don't mean to
14 be flippant about it, but that's --

15 MR. WARREN: No, no, no. It's not --

16 MR. EDMONDS: -- that's a good way to
17 address it.

18 MR. WARREN: Yeah, so I guess just one
19 maybe follow-up thought in there, Brian, would be, you
20 know, again, I -- I know what, what Albert's been
21 working on here and trying to bring it into
22 conformance with -- with sort of the language that we

1 have in Maryland that's been working there. But I
2 don't know, maybe if there's something that if -- if
3 we like the -- if the general idea is acceptable to
4 the group and it's something they want to bring
5 forward, I don't know if maybe that's something that
6 you and the Commission staff could help with, is to
7 say, "Exactly how should this be worded so that the
8 process that will ensue is clear to everyone," you
9 know.

10 It's like, you know, again, in
11 Maryland, we sort know that these things will wind up
12 on an administrative docket. They're, you know -- I
13 mean it's informal that the working group is notified,
14 but at least you know there's been a filing and
15 something's be docketed. If -- if what -- how do we
16 make the thing execute in such a way that there -- you
17 know, people would get notified and something
18 would -- there'd be an opportunity to comment before
19 the Commission, you know, lets the 90 days pass, you
20 know, without action. You know what I mean? So
21 that -- that might be helpful if there was -- if there
22 was some -- some clarification of what's -- what's the

1 best process to -- to describe.

2 MR. EDMONDS: So that's a good -- good
3 point. What -- this kind of leads me to the -- sort
4 of the last thing that I want to talk about. We're
5 not going to get to the Maryland provisions, all of
6 the Maryland provisions under section O, but we sort
7 of looked at it today, and we focused in on this part.

8 One of the things I'm looking for this
9 group to do at a certain point is to say, all right,
10 we've kind of scratched the surface on most of the
11 things that we set out to do and more. And so let's
12 now begin to sort of memorialize what we've been
13 talking about over the last four or five months and
14 let the Commission know what we -- what we've talking
15 about, what we've been thinking in the form of a
16 report. And these type of proposals, rule changes are
17 important to that overall presentation, because to the
18 extent the working group, whether it be through a
19 consensus or even a non-consensus, believes that
20 there's certain changes that the Commission should
21 make, vis-a-vis its rules, then that would be
22 something that would be included in the report as a

1 proposal that the Commission can consider and then
2 turn around and issue a notice of proposal making with
3 any if not all of the proposals that have been
4 suggested by the working group.

5 Obviously, it's better if there's
6 consensus, because the presumption is that any
7 proposals that have at least reached a consensus from
8 the majority of the members of this group, if not all
9 of them, would make the rule making a slightly easier
10 process, which you have to account for the fact that
11 there may be other people that haven't been part of
12 this process, that when they get the notice of
13 proposal we're making that they may, you know, object
14 to -- to various provisions. I don't know.

15 But that's kind of where I'm taking
16 this, so that what Mr. LaFrance has proposed is
17 something that will be part of that. We're not going
18 to just talk about it today and never talk about it
19 again. No, it will go into the report among other
20 things that have been discussed.

21 And so right now, you know -- you know,
22 I've asked Pepco to -- to at least prepare an outline

1 of the working group report that kind of goes over
2 everything that we've talked about, even
3 noted -- notifying -- or acknowledging, sorry, that
4 the educational session that we had last month. And
5 that way, even though the Commission didn't ask for
6 the report, I think it's important that we provide it
7 so that they know exactly what we've been doing, and
8 they can give us directions to what they would for us
9 to do going forward, and whether or not they agree
10 that we ought to take up some rule changes per the
11 recommendation of if not the majority, the full body
12 of the working group.

13 So that's kind of what I'm thinking so
14 that we don't miss anybody's, you know, thoughts. So
15 it sounds like we have a few other areas that need to
16 be explored the DOEE has proposed, and so we may not
17 quite be done yet. But what I'm going to be asking
18 the company to do is to go ahead and begin to prepare
19 the outline for the report, and then we'll just have
20 to -- and hopefully we can have that for the next
21 meeting, and then we can begin to talk about that.
22 That's a long-winded answer, and hopefully that's

1 responsive to -- to your question.

2 MS. BECKHAM: Just to be clear, you
3 would want Pepco to have an outline by the next
4 meeting?

5 MR. EDMONDS: By the next meeting,
6 yeah. We can talk about the outline if you can
7 circulate it before. That way, we can have a
8 conversation about it.

9 There are a couple other loose items
10 that I -- to be honest with you, I can't really
11 remember, other -- I think DOEE was going to be
12 providing something. I can't remember what it was.
13 We'll look at the transcript. But we'll -- we'll
14 identify that in the e-mail that's going out to
15 everyone so that we make sure we're clear about what
16 we want to do.

17 MS. BECKHAM: Another -- just for the
18 portion of this meeting that we started that was not
19 transcribed --

20 MR. EDMONDS: It's recorded.

21 MS. BECKHAM: But it will be recorded?

22 MR. EDMONDS: Yeah, it's recorded.

1 Everything is recorded.

2 MS. BECKHAM: Okay.

3 MR. EDMONDS: So there probably will be
4 a separate Teams transcript. It's not always the
5 best, but there's a recording of this. We're
6 recording now, so -- so I think we'll all have to go
7 back through the recording, because there were some
8 things that were asked. I didn't -- I didn't jot
9 everything down, so I'll have to take a look at that.

10 Mr. Warren, I don't know if that was
11 responsive to your question, so I want to make sure
12 we're -- that was a long response, but I just want to
13 make sure you're okay.

14 MR. WARREN: Yeah, yeah, yeah. Thanks,
15 Brian. That -- that was helpful. I know we're
16 heading towards a report, and I think -- I hope I'll
17 get some time to, you know, be prepared for how I can
18 provide input for that.

19 I think my -- my other question was a
20 little more narrowly on some of this notice process,
21 but thanks for reviewing where you want to be at here.
22 Appreciate that.

1 MR. EDMONDS: All right. Thank you.
2 Appreciate it.

3 I want to circle back to a couple
4 other -- all right. I saw that. Let me circle back
5 to Mr. Lydic's comment about an hour or so ago. "Does
6 Pepco already screen for protection to ensure short
7 circuit isn't more than 10 percent of available fault
8 current near the point of common coupling or PCC? If
9 so, I think that could screen out instability, which
10 might happen with stiffness ratios below four to five.
11 Does that align with what you're thinking about,
12 Laura?"

13 So I -- the question of -- exactly sure
14 who the question is to. Is it -- is it to Laura or is
15 it Pepco? Maybe you can enlighten us, Mr. Lydic, if
16 you're still on? He's not on.

17 Can either Pepco or Laura answer that
18 question? "Do you already screen to ensure short
19 circuit isn't more than 10 percent available fault
20 near the point of common coupling?"

21 MR. BUDD: For some of the larger
22 sites, we may perform that screening. I'd have to go

1 back and check with the teams to be sure.

2 MR. EDMONDS: Okay.

3 Ms. Ward, do you have a response as to
4 whether or not his question aligns with what you were
5 thinking?

6 If you're speaking, you're muted.

7 MS. WARD: Yeah. So, yeah -- so my
8 name is Laura. My last name is W-A-R-D, with DOEE.
9 And I just -- okay. Sorry. I didn't read that
10 question before that. Just seeing the question in the
11 chat. So ...

12 MR. EDMONDS: Do you have anything to
13 add? Was that responsive --

14 MS. WARD: No, no.

15 MR. EDMONDS: No?

16 MS. WARD: Not at this moment, but
17 maybe, yeah, and maybe I can -- yeah, I can
18 provide -- about it.

19 MR. EDMONDS: Okay.

20 MS. WARD: Thank you.

21 MR. EDMONDS: Thank you.

22 Mr. Warren posted a note. "Here's a

1 link to Pepco's latest interconnection report filed in
2 Formal Case 1050. I don't see anything in this report
3 breaking down applications by size or regarding the
4 number of applications that require upgrades, per my
5 earlier questions in the meeting."

6 I don't know if the company has a
7 response. I know that that filing is something you're
8 required to file every year.

9 MS. BECKHAM: Yeah, that's -- that's a
10 filing that's required every year, and we file it in
11 accordance with the -- the regulations, and
12 it's -- what's included in that is what is dictated by
13 the regulations.

14 I think when Kunle was bringing that
15 point up, it was just to highlight how many
16 applications that Pepco has approved to install. I
17 don't think he was referencing it -- that it provides
18 that information about distribution system upgrades,
19 how many we've done. We're going to take that back
20 and get back about that.

21 MR. EDMONDS: All right. Thank you.

22 Ms. Ward posted, "Whenever you have a

1 moment, please review these documents." So there's a
2 benchmarking file that she's supposed to -- I think
3 that's what she promised to provide. So folks can
4 take a look at that when they get an opportunity.

5 All right. So I think we're going to
6 stop for the day. I apologize for -- for starting
7 late. Reminder that the minutes for today's meeting
8 are going to be prepared by the District government.
9 Pepco will be responsible for the meeting minutes for
10 next month, and then we'll come back to OPC, should we
11 need to have meeting in July.

12 I think that's all that we have. Are
13 there any other comments or questions? We covered a
14 lot today. Appreciate everybody's patience in working
15 through challenges that we had this morning, but I'm
16 grateful that we're at the end. Any questions,
17 comments? We're being done, but we are going to
18 conclude for today, and I'll send a follow-up e-mail
19 in a few days to let everyone know exactly what's in
20 store. Oh, we need to set our next meeting date.

21 (Whereupon, at 12:29 p.m., the
22 proceeding was concluded.)

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CERTIFICATE

I, OLIVIA THOMPSON, 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.



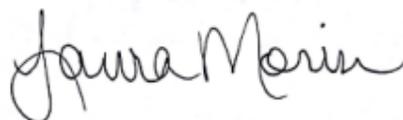
OLIVIA THOMPSON

Notary Public in and for the
State of District of Columbia

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CERTIFICATE OF TRANSCRIBER

I, LAURA MORIN, 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.



LAURA MORIN

&	280 53:8	absolutely	adding 4:15
& 2:4,20	3	17:16 41:8	49:22 50:16,18
1	33614 81:16	acceptable	additional 6:14
1 48:10,17	4	71:3	6:15 32:21
1.03 18:9	4 50:13	accordance	50:13 54:2
1.05 18:13	4,130 33:1	79:11	address 3:8
10 77:7,19	40 1:5 47:13	account 27:6	40:7 55:17
100 41:22 42:7	40-02 49:11	73:10	70:17
42:11	54:17	accounted	addressed 45:7
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