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May 30, 2025

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street NW, Suite 800
Washington, DC 20005

Re: Formal Case No. 1050, RM40-2023 and ET2023

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Meeting Minutes for the Technical Conference held on May 6, 2025.

Please contact me if you have any further questions.

Sincerely,

/s/ Taylor W. Beckham

Taylor W. Beckham

Enclosure

cc: All Parties of Record

May 6, 2025 FC 1050 Technical Conference Minutes:

1. Pepco was directed to take the minutes.
2. Pepco began by going over its responses to DOEE's supplemental questions to Pepco.
 - a. Questions to Pepco:
 - i. DOEE, for a large majority of the responses, felt that its questions were not answered. They will provide a line by line of why they believe the answers were not sufficient.
 - ii. OPC asked about the incremental increases of employees and whether Pepco had those numbers and how much of the employees that Pepco mentioned in its presentation are dedicated to Pepco D.C. only.
 1. Staff referred to page 6 of the Technical Conference Compendium where it was indicated that there are 14 employees and asked whether the reorganization mentioned included the 14. Pepco responded that this data was reflective of the team at the time. Staff requested the total number for DC, MD, Delaware and what is dedicated to the District and what is broken down by function.
 - iii. DOEE stated that GPC is not the only team that is part of interconnection and asked about the engineering team and how are they included in the staffing. Pepco responded that it has brought engineering into the centralized solar organization and that currently there are 3 engineers. The future state will have Cap planning.
 - iv. DOEE asked how is the work going to be handled or managed. There are many times where there are long wait times because the work is handed over and whether this new organization is going to build more competency with interconnection.
 - v. CHESSA/NCS asked if Pepco has tracked the amounts paid by interconnection customers since Pepco has not tracked the benefits to customers of interconnection upgrades? Pepco responded that it tracks costs based on the cost letter. Pepco tracks the project financials and referred to Question 7, page 11 in Tech Conference Compendium. Pepco cannot say that the number includes the total of work and the labor. CHESSA also asked if there was anything preventing Pepco from using meter socket adapters in D.C.? Currently Pepco does not evaluate for meter socket adapters as there is no requirement to do so. CHESSA asked if someone proposed a project with an MSA what would the company do? Pepco indicated that right now, it would deny it.
 - vi. OPC asked a question regarding costs and averages and the factors that lead to variances. Pepco responded that all projects do not have the same level of work and there are no ways to standardize the cost.
 - vii. CHESSA commented on providing a unit cost guide for common types of interconnections.
 - viii. DOEE made comments about reviewing the responses that Pepco had provided and reviewing those responses to provide additional information about why it

was their belief that the responses Pepco had provided were not responsive, in their view and why they were looking for responses to their questions.

- ix. Staff asked a follow-up question about the March Annual interconnection report and whether there was a change that needs to be updated to the information provided in the report based on the responses to the supplemental questions from DOEE. Pepco responded that there is a difference between the questions that were asked and answered in the Tech Conference Compendium which was specific to who is reviewing interconnection applications compared to information provided in the supplemental response being the entire GPC team.
- x. DOEE stated that Pepco has filed in the past a request for funds for new staff. Does Pepco still feel that they have enough staff? Pepco responded that the landscape has changed from when it filed its MYP application in 2023. In addition, Pepco was initially looking at all the additional FTE as straight O/M, but it has now looking at how to allocate the application fees, engineering fees, and admin fees to its current staff.
- xi. Staff asked whether the relationship managers were new and Pepco responded that it onboarded 4 this year.

3. Pepco provided its responses to IREC's Supplemental questions:

a. Questions to Pepco:

i. IREC:

- 1. Volt watt- there are a range of settings, the default is outside the ANSI settings and why not consider other ranges and how does Pepco go about choosing those values.
- 2. Question on flicker and stiffness ratios might be used, is there a screen based on stiffness. Pepco always does a power flow to understand the flicker. When Pepco talks about stiffness it is about grid following inverter stability it does not have way to study for grid forming inverter. There could be an indication that there is instability being caused. The ratio is about 5.
- 3. IREC commented that protection on the substation may be similar to a network protector and whether that is what Pepco is trying to avoid in terms of backflow. Pepco stated that protection on the Sub Stations is similar to a network. Relays at the SS need to see faults at high side and remote. The protection elements have to be very sensitive and these come up against DER, there is no real way to tell the difference. This is a balance between safety, reliability and getting more DER on line.
- 4. Unintentional export, if not mitigated quickly could cause damage. Is 30 seconds that long? The default is 30 sec, the magnitude of the export matters as well as time. If it's a small one it may not matter as much, but if a larger customer then Pepco may have to look at damage curves for Sub. St exports. Hopefully Pepco would hit the trip settings first, but if parties are successful is making us move out trip setting this creates more risk.

5. Does not see IE more than 200% of a system.
 - ii. DOEE asked what the communication protocol is required for DERs and about cascading failure. Pepco responded that there isn't really a communication protocol but that it evaluates current at the point of interconnection and whether the grid-following inverter could potentially cause instability. This would not be about the stiffness ratio being to low. DMP3 is Comm protocols.
4. Discussion about the process flow from IREC.
 - a. Staff asked about other states requiring a updated itemized cost guide and IREC responded that California and maybe a few others do.
 - b. Staff asked a question attempting to clarify what timelines IREC was recommending regarding providing ATO and when the five day count would start.
 - c. Staff requested that IREC provide cites to other states' regulations that they relied on.
 - d. Pepco asked about what IREC meant regarding a "material modification review." IREC explained that this would be a process where an applicant can submit to the utility proposed modifications to any information it provided in the applications or interconnection agreement for existing DERs.
 - e. Pepco asked about whether, in terms of the ombudsmen process, IREC had thought about the increase or decrease to timelines and costs to applicants that their suggestions could create? IREC responded that for the ombudsmen it was not aware of how other states have done that. Staff indicated that CHESSA had suggested that the ombudsmen be a PSC employee.
 - f. Pepco asked regarding additional studies such as the system impact studis – how would the studies be paid for? IREC indicated that the costs should remain with who they are assigned to. Pepco followed up regarding if additional costs resulted higher application fees or whether that should be socialized across District customers? IREC spoke to the need for a timeframe to complete the studies.
5. Next Meeting June 3, 10-12 to discuss the Power Flow Analysis
 - a. Allow parties that made comments in Nov last year to make a presentation on this and to split into technical and regulatory so it is clear what is being requested to the commission



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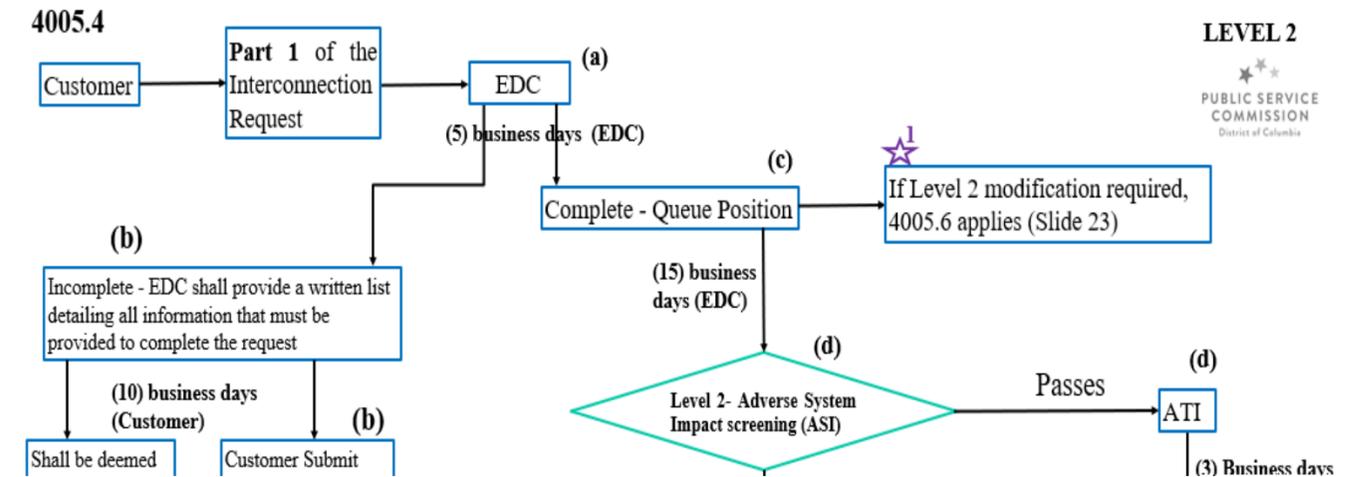
Stakeholder Input for the Process Flow

(15 D.C.M.R. §4000)

April 1, 2025

Our Ask

- Identify any pain points or suggested solutions on the flow chart and mark them with a symbol (like star) and number



- Add a description of the pain points or any suggested solutions in a separate slide



Points of Interest

CHESA recommends amending 15 DCMR § 4005.4(d) as follows:
15 DCMR § 4005.4(d):
 (d) ~~Unless Subsection 4005.6 applies, within~~ fifteen (15) business days after the EDC notifies the Interconnection Customer that it has received a completed Interconnection Request, the EDC shall evaluate the Interconnection Request using the Level 2 screening criteria and notify the Interconnection Customer whether the Small Generator Facility meets all of the applicable Level 2 Adverse System Impact screens and whether the EDC has determined that the Small Generator Facility can be interconnected safely and reliably to the Electric Distribution System. If the proposed interconnection meets all of the applicable Level 2 Adverse System Impact screens and the EDC determines that the Small Generator Facility can be interconnected safely and reliably to the Electric Distribution System, the EDC shall provide the Interconnection Customer an Approval to Install within three (3) business days of notification pursuant to this subsection. The EDC shall provide an EDC-executed Interconnection Agreement within three (3) business days after notification of Level 2 issuance of the Approval to Install.



15 DCMR § 4005.4(f)
 The EDC may not prevent or delay the submission of the Level 2-4 Part II – Small Generator Facility Interconnection Certificate of Completion and the signed inspection certificate from the Interconnection Customer.

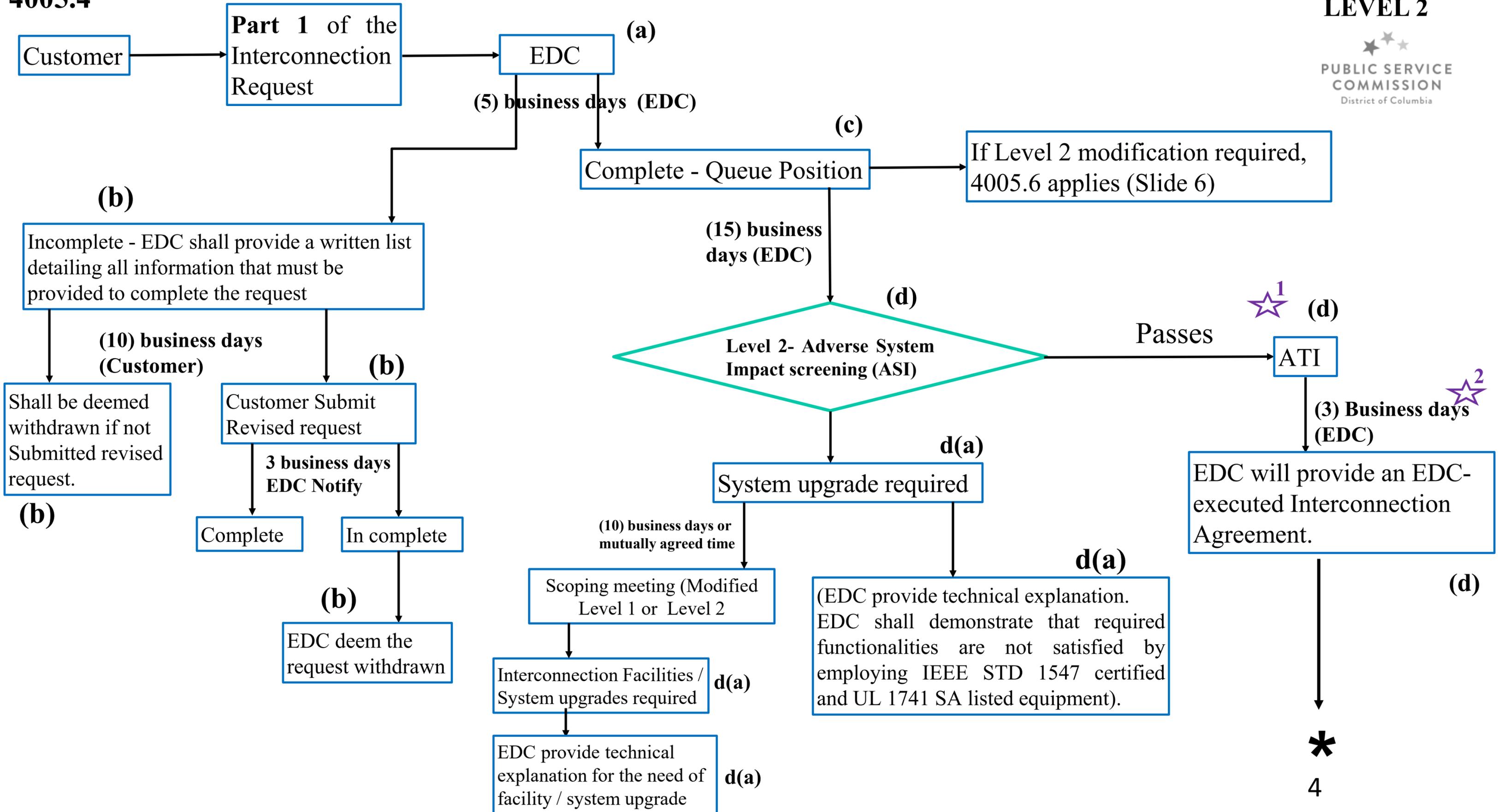


CHESA recommends that the Commission adopt the following as an amendment to 15 DCMR § 4005.4(g):
15 DCMR § 4005.4:
 (g) The EDC shall provide the Interconnection Customer with Authorization to Operate within twenty (20) business days of receiving a completed Level 2 Part II -

**4005 LEVEL 2 INTERCONNECTION REVIEWS,
for Small Generator Facilities (20kW to 5 MW)**

4005.4

LEVEL 2



ATI = 20 business days (5 business days for Completeness + 15 business days for ASI)

* **ATI** (d)

Unless extended by mutual agreement
Within 24 months of receiving an ATI or 6 months from the
completion of any Distribution System upgrades, whichever is later
(EDC/Customer)

(e)

Customer shall provide EDC
Completed Level 2-4 **PART II** - Small Generator
Facility Interconnection Certificate of Completion Form,
including the signed inspection certificate.

(f)

Written explanation detailing
the reasons and any standards
violated.
EDC shall offer to redo the
Witness Test at the
Interconnection Customer's
expense at a time mutually
agreeable to the customer and
EDC.

(10) business days
(at mutually agreeable time)

Fails

(f)
Witness Test

Sometime after witness test
is completed

Passes

(g)

EDC has received proof of the
electrical code official's
approval, the Small Generator
Facility has passed any
Witness Test by the EDC, and
the EDC has issued the
**Authorization to Operate
(ATO)**

(10) business days
(at mutually agreeable time)

Waived

If EDC does not perform witness
test, the test is deemed waived.

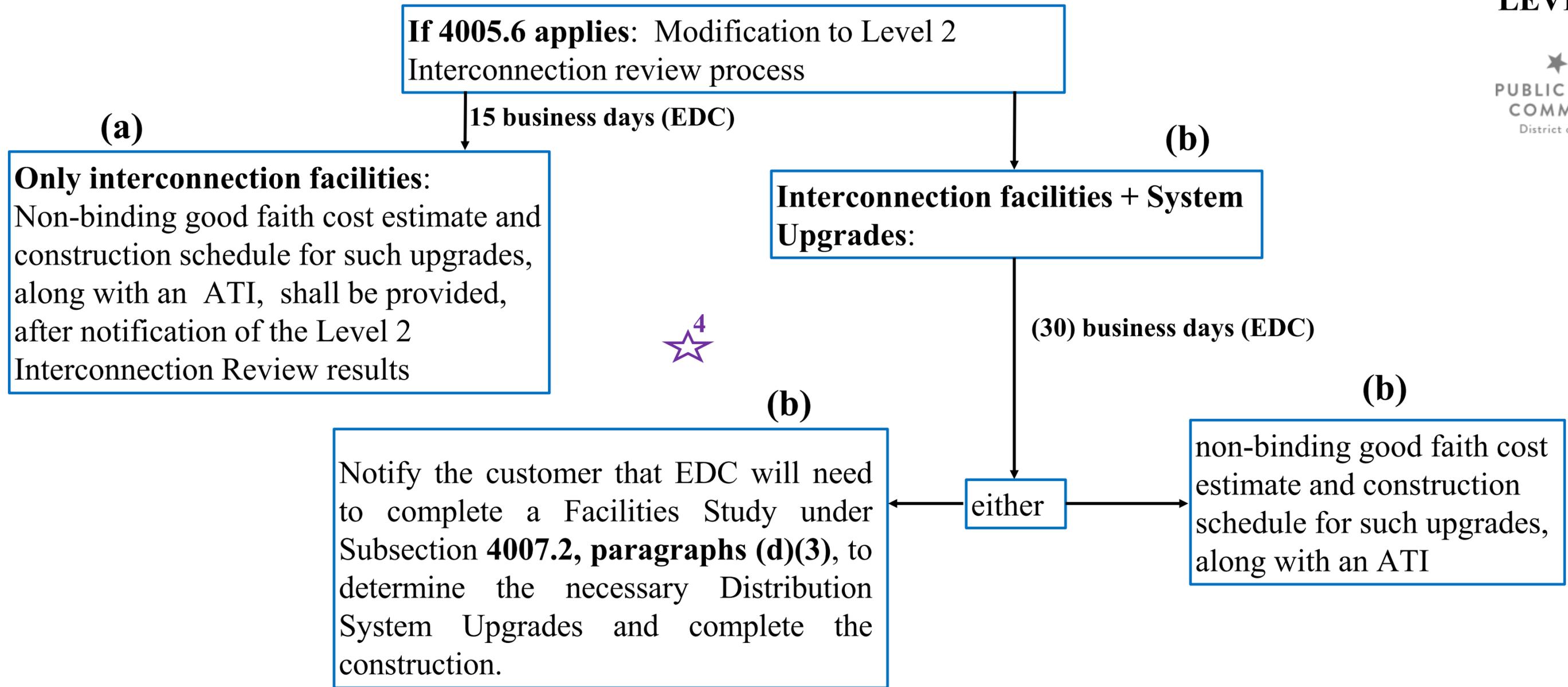


(f)

h

❖ Failure to provide a photo in a timely manner will not be a reason for the EDC to deem an Interconnection Request incomplete.

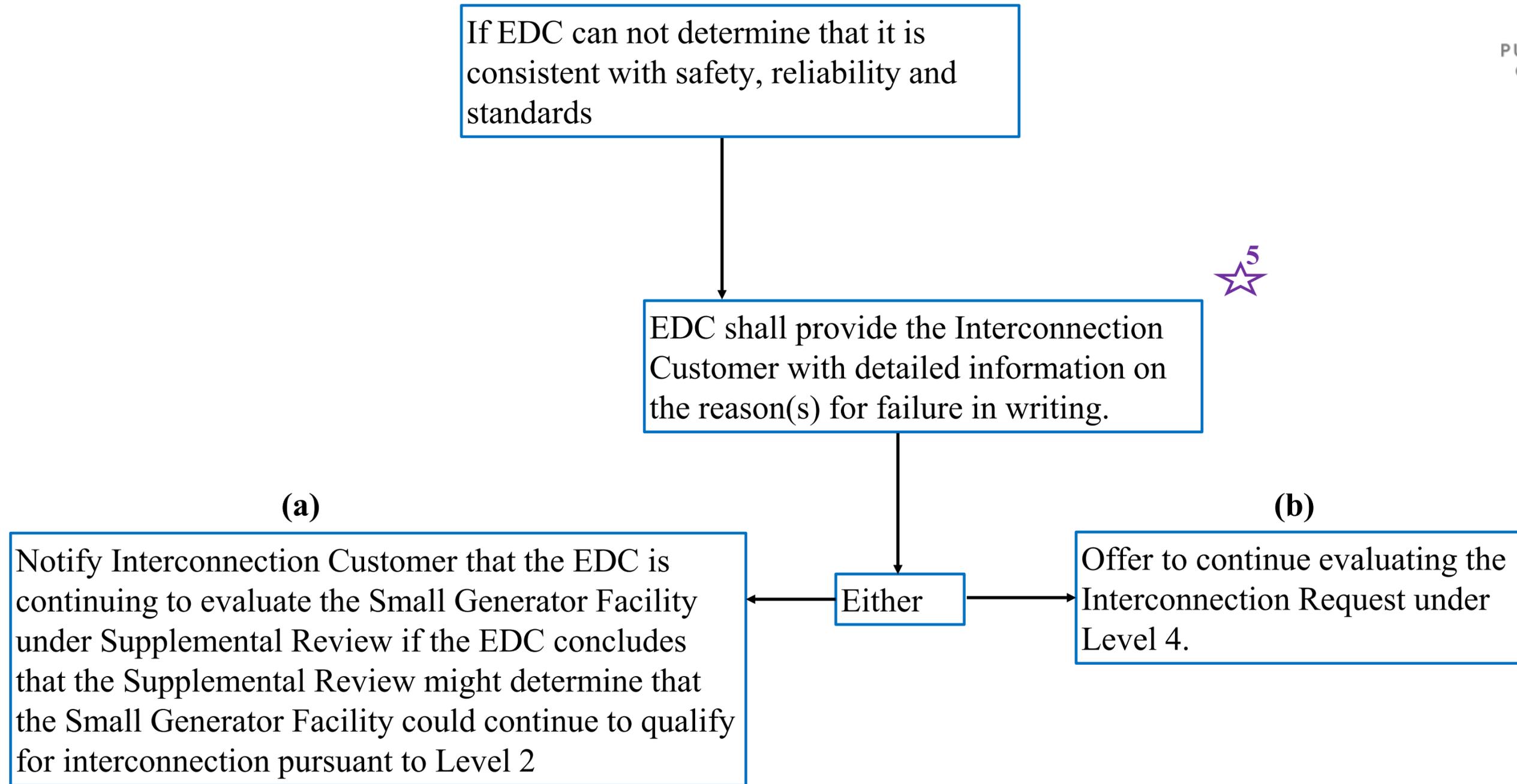
4005.6



4005.6 (b)

4007.2 (d)(3) - Level 4 Interconnection Reviews

- When the Interconnection Customer and EDC agree at a Scoping Meeting that an interconnection feasibility study shall be performed, and if the Interconnection Customer and EDC do not waive the interconnection impact study, the EDC shall provide to the Interconnection Customer, no later than **five (5) business days** after the Scoping Meeting, an Interconnection System Feasibility Study Agreement, including an outline of the scope of the study and a nonbinding good faith estimate of the cost and time to perform the study.



❖ No timeline specified

Points of Interest

1

IREC largely supports the intent of CHESSA's ATI proposals to amend the definition of ATI and clarify and address gaps in regulatory ATI deadlines.

2

DC Rules: Interconnection Agreements are provided three days after ATI is issued for Level 1, 2, and 3.

IREC recommends that Interconnection Agreements and approval to interconnect are provided at the same time customers are notified that they passed the screens for Level 1, 2, and 3.

3

DC Rules: Deadlines to provide ATO is provided only for Level 1.

IREC recommends that there is a 5-business day deadline to provide ATO for Level 1, 2, 3, and 4.

15 DCMR § 4005.4(g) The EDC shall provide the Interconnection Customer with Authorization to Operate within five (5) business days of receiving a completed Level 2 Part II - Small Generator Facility Interconnection Certificate of Completion Form, including the signed inspection certificate. An Interconnection Customer may begin interconnected operation of a Small Generator Facility provided that there is an Interconnection Agreement in effect, the EDC has received proof of the electrical code official's approval, the Small Generator Facility has passed any Witness Test by the EDC, and the EDC has issued the Authorization to Operate. Evidence of approval by an electric code official includes a signed inspection certificate.

4

DC Rules: There is no timeframe specified to notify customers that that a Facilities Study is needed

IREC recommends that the utility have 5 business days to notify customers that a facilities study is needed

*15 DCMR § 4005.6.(b) If the Interconnection Request requires more than the addition of Interconnection Facilities to the Electric Distribution System, the EDC may elect to either provide a non-binding good faith cost estimate and construction schedule for such upgrades within thirty (30) business days after notification of the Level 2 Interconnection Review results, or the EDC may notify the Interconnection Customer **within five (5) business days** that the EDC will need to complete a Facilities Study under Subsection 4007.2, paragraphs (d)(3), to determine the necessary Distribution System Upgrades and complete the construction.*

Points of Interest



DC Rules: Section 4005.7 requires Pepco to provide “detailed information on the reason(s) for failure in writing.”

IREC recommends that the Commission incorporate more prescriptive language into the District’s Interconnection Rules that requires Pepco to provide sufficient detail to interconnection customers explaining why a project failed a technical review screen. The proposed revisions below should also apply to Section 4004.6.

*15 DCMR § 4005.7 When a Small Generator Facility is not approved under a Level 2 review, the EDC, at its sole option, may approve the Interconnection Request, provided such approval is consistent with safety and reliability, and shall provide the Interconnection Customer an Approval to Install after the determination. If the EDC cannot determine that the Small Generator Facility may be interconnected consistent with safety, reliability, and power quality standards, the EDC shall provide the Interconnection Customer with detailed information on the reason(s) for failure in writing. **If one or more screens are not passed, the EDC shall provide the specific screens that the Application failed, including the technical reason for failure. The EDC shall provide information and details about the specific system threshold or limitation causing the Application to fail the screen. In addition, the EDC shall either:***

Updated Export Provisions



DC Rules: Defines nameplate capacity but not export capacity

IREC recommends that the rules explicitly define and differentiate between the concept of nameplate and export capacity. This would be an additional component of existing IX Process in DC.

DC Rules: Does not identify 1547-2018 categories, voltage regulation function activation, and settings nor reference a Commission approved TIIR

IREC recommends that the rules identify 1547-2018 categories, voltage regulation function activation, and settings or reference external Commission-approved documentation (e.g. TIIR). This would be an additional component of existing IX Process in DC.

DC Rules: Does not identify acceptable export control methods

IREC recommends that the rules identify export control methods, and certified Power Control Systems (PCS) are identified as one of those methods. This would be an additional component of existing IX Process in DC.

DC Rules: The Level 1 process applies to projects 20 kW or less

IREC recommends that the Level 1 process eligibility is expanded to include projects with a nameplate rating of up to 50 kW, when a project's export capacity is limited to 25 kW. This would be a modification of existing rules.

DC Rules: Eligibility for the Level 2 process is based on nameplate capacity

IREC recommends that the Level 2 process eligibility is based on export capacity rather than nameplate capacity. This would be a modification of existing rules.

DC Rules: Penetration Screen is based on aggregating generating capacity

IREC recommends the penetration screen be based on export capacity. This would be a modification of existing rules.

DC Rules: Shared Secondary/Transformer Rating Screen is based on aggregating generating capacity

IREC recommends the shared secondary/transformer rating screen be based on export capacity. This would be a modification of existing rules.

DC Rules: There is no inadvertent export screen

IREC recommends the rules include an inadvertent export screen that is applied during the initial review for systems with non-exporting capacity greater than 250 kW. This would be an additional component of existing IX Process in DC.

DC Rules: The Supplemental Minimum Load Screen is based on nameplate capacity

IREC recommends that the supplemental minimum load screen is based on export capacity. This would be a modification of existing rules.

Updated Screens

List the additional pain points or suggested improvements related to the Interconnection Process that cannot be mapped on the flow chart



DC Rules: There is no timeframe for the utility to complete system impact or facilities study

IREC recommends the timeframe for utility completion of the study process is less than 120 calendar days. This would be a modification of existing rules.

DC Rules: There is no language defining what constitutes a material modification and the process associated with requesting a material modification

IREC recommends there is a clear definition within the rules for what constitutes a material modification, and the process associated with requesting a material modification is outlined. This would be an additional component of existing IX Process in DC.

DC Rules: Does not require the publication of an annually updated itemized cost guide

IREC recommends that the rules require Pepco to publish an annually updated itemized cost guide that identifies the typical range of costs associated with equipment and labor. This would be an additional component of existing IX Process in DC.

List the additional pain points or suggested improvements related to the Interconnection Process that cannot be mapped on the flow chart



IREC is supportive of CHESSA's proposal, seen below, to establish an Interconnection Ombudsman. This would be an additional component of existing IX Process in DC.

15 DCMR § 4099 (Definitions):

"Ombudsman" – means a person appointed to assist persons seeking interconnection governed by rules adopted under this chapter. The Commission-appointee shall possess technical expertise related to interconnection and interconnection procedures. The duties of the interconnection ombudsman include but are not limited to: (1) tracking interconnection disputes; (2) facilitating the efficient and fair resolution of disputes between interconnection customers and EDCs; (3) reviewing interconnection policies to assess opportunities for reducing interconnection disputes; (4) convening stakeholder groups as necessary to facilitate effective communication between interconnection stakeholders; and (5) preparing reports that detail the number, type, resolution timeline, and outcome of interconnection disputes and make recommendations to the Commission as to how to increase efficiency and reduce costs of interconnection.

15 DCMR § 4009 (Disputes):

4009.5 When a dispute arises, the parties may contact the Commission's interconnection Ombudsman for assistance with dispute resolution or the Commission may refer the dispute to the Ombudsman.

IREC recommends that the rules establish an Interconnection Task Force or Forum. This would be an additional component of existing IX Process in DC). Sample language:

"G. Interconnection Forum

The Commission shall host a quarterly interconnection forum open to the public wherein interested stakeholders and Utilities can discuss interconnection challenges and potential solutions."

IREC recommends that the rules are amended to require comprehensive reporting of interconnection timelines (e.g. adding Level 2 ATO) and benchmarks and consequential corrective action plans when exceeded.



THANKS

Question	Pepco's Response
DOEE Supplemental Questions	
<p>To better understand the frequency of Pepco's determinations regarding the projects that require upgrades, including for projects that did not proceed to the point of receiving ATO, please complete the following table for 2024 (or any another 12, 18, or 24-month time period that aligns with Pepco's records). If Pepco does not have records based on project size, please provide answers based on records Pepco does have (e.g. Level 2 and Level 4 review):</p>	<p>Pepco has responded to this question in FC1050 Tech Conference Deck presented at the March 4, 2025 Meeting. <i>See Slide 16 (in the Appendix) and reference to the Technical Conference Transcript Page 22, 1-8.</i></p>
<p>How do the analyses described for (a) Level 2 Net Energy Metering applications and (b) Community Solar – Level 2 to 4 applications differ from each other (particularly for Level 2 projects for both NEM and Community Solar)?</p>	<p>Pepco has responded to this question in FC1050 Tech Conference Deck presented at the March 4, 2025 Meeting. <i>See Slide 10, "Technical Review Process", of Tech Conference Presentation, 03/04/25 and the Technical Conference Transcript Page 23-29, 38-39.</i></p>
<p>Does Pepco need to conduct a new hosting capacity analysis for each interconnection application, or is Pepco ever able to rely upon existing hosting capacity analyses (in particular, those that underlie Pepco's publicly available hosting capacity maps)? If Pepco is not able to rely upon its existing hosting capacity maps for this step in the review process, please explain why it is unable to do so.</p>	<p>Pepco has responded to this question in FC1050 Tech Conference Deck presented at the March 4, 2025 Meeting. <i>See Slide 10, "Technical Review Process", of Tech Conference Presentation, 03/04/25 and the March 4 Technical Conference Transcript pp. 36 -40.</i></p>
<p>In the period since that testimony was filed in April 2023, did Pepco expand its Interconnection team (e.g. by hiring new staff or bringing on new contractors)? If so, please explain how (e.g. how many new staff and what roles they serve).</p>	<p>Pepco has changed the organizational structure for the Green Power Connection team, which introduces efficiencies in interconnection application processing. Pepco's new centralized Solar organization has expanded to include DER regulatory & operational strategy, DER engineering, Project Management, Solar Customer Insights, and Community Solar Billing groups in one central department. The department has onboarded incremental engineers, program managers, billing specialists, and relationship managers that support DC as well as PHI-wide functions.</p>

Question	Pepco's Response
	<p>This was also referenced quickly during the March 4 Technical Conference. <i>See the March 4 Technical Conference Transcript Page 56, 17-34.</i></p>
<p>Q1: The period since that testimony was filed in April 2023, did Pepco make any technology investments that address any of the concerns Pepco raised in its testimony (e.g. around burdens associated with manual calculations of NEM and CREF credits)?</p> <p>Q2: Does Pepco think the steps it has taken pursuant to its Corrective Action Plan, filed in March 2024, have been sufficient to bring the Company into compliance with the regulatory timelines for interconnection?</p>	<p>Q1: Yes, enhancements have been made Pepco's Community Solar Portal to integrate more seamlessly with internal systems and streamline the experience for Subscribing Organizations. This project includes but is not limited to improvements in both the developer and customer enrollment processes, billing and applied credit enhancements, bill print changes to increase transparency, upgrades to the Community Solar Portal, and enhancements to Connect to Grid (CTG) platform to better align workflows. Notably, this does not include any enhancements to the Kevala Portal. <i>See FC1176 OPC DR 16-1.</i></p> <p>Q2: Pepco has taken several additional steps, including those filed in the March 2024 filing, to meet Regulatory Metrics. Pepco is constantly evaluating new procedures, enhancements, and trainings to support the application and engineering teams meet the short regulatory timelines, growing volume, customer feedback loops and application complexity. <i>See FC1050 Pepco's 2025 Annual Interconnection Report.</i></p>
<p>Please provide copies of any reports or other documents (e.g. presentations or slide decks) from the meetings Pepco describes showing evaluations of Pepco's interconnection timeline performance and/or actions it has taken to improve timeline performance</p>	<p>Pepco discussed this at the FC1050 Tech Conference Meeting on March 4th. <i>See Slides 5-7, "Program Performance", of Tech Conference Presentation, 03/04/25.</i></p>
<p>Q1: Please provide the average cost (in dollars) for each of the common interconnection materials and common types of labor identified in Pepco's responses on pages 9-11 for calendar year 2024 (or any other recent time period that aligns with Pepco's records).</p> <p>Q2: If Pepco does not have records on the average unit costs for common equipment and interconnection labor,</p>	<p>Q1: Pepco's labor and project costs vary significantly across projects, scope, and location. An average cost for interconnection materials and labor may be taken out of context if used for project specific scopes.</p> <p>Q2: Unit Costs have not been developed at this stage as they vary heavily by location. Pepco is evaluating unit cost guides as potential cost estimation tool.</p>

Question	Pepco's Response
<p>please let the Commission and parties know so that we can address this topic at a future technical conference.</p>	
<p>Why have costs associated with Level 2 interconnection facilities increased so significantly from 2021 to 2024?</p>	<p>The costs associated with interconnection have several contributors, including, DER saturation, grid interconnection location, market conditions affecting material and labor costs, and many other factors. Any increases in costs that may have occurred would not be due to a single factor.</p>
<p>Is Pepco able to calculate or estimate the share of cost increases that are due to inflationary pressures (i.e. similar equipment or labor that now costs more as a result of inflation or supply chain disruptions) vs. increases in interconnection facility needs (or other factors that may be relevant)</p>	<p>This would be very difficult to calculate and, in many cases, impossible. The material and labor needs of each upgrade are most dependent on the location and detailed scope of the project.</p>
<p>Why do Pepco's engineering reviews expire after 30 days (or in some instances, 90 days) (Technical Conference Compendium, p. 12-13)?</p> <ul style="list-style-type: none"> - Does this expiration always apply, or only in circumstances where specific changed conditions require a new review? - Does Pepco know if it is standard across the industry for interconnection engineering reviews to expire after 30 days? - How does Pepco communicate with customers about the need to proceed before the interconnection review expires? 	<p>Pepco has responded to this question in FC1050 Tech Conference Deck presented at the March 4, 2025 Meeting. <i>See Slide 11, "Additional Insights on the Technical Process", Tech Conference Presentation, 03/04/25.</i></p>
<p>For the table of timelines provided on p. 14 for average length of time from ATI to ATO, please provide a similar table (broken out by year and Level One, Two, or Four review) for the average and median <u>total time</u> for customers to complete the interconnection process, from Pepco's initial receipt of a completed application through to a project receiving ATO.</p>	<p>Pepco has responded in FC1050 Tech Conference Deck presented at the March 4, 2025 Meeting. <i>See Slide 8, "Average Processing Timelines-Ack to ATO", Tech Conference Presentation, 03/04/25.</i></p>

Question	Pepco's Response
<p>Q1: How many projects in 2024 required a witness test?</p> <p>Q2: Why does Pepco only have one employee who conducts witness testing? What happens to interconnection customers when that employee is on PTO or otherwise unavailable?</p> <p>Q3: Has Pepco ever considered, or would it consider, allowing witness testing to be performed by a non-Pepco representative (e.g. through submission of a verified testing report conducted by a third-party verifier)?</p>	<p>Q1: 12 witness tests occurred for spot networks, but there are many different categories for witness tests.</p> <p>Q2: As volume grows Pepco will continue to evaluate the staffing levels for this role in conjunction with alternate approaches.</p> <p>Q3: Pepco has allowed in limited specific instances an outside party to do witness tests for select projects. Pepco is still evaluating whether this model is something that it would do on a larger scale and thus at this time does not allow outside parties to conduct witness tests.</p>
<p>On page 15, Pepco notes that the Company has started to track the impacts that upgrades made to the system have on behalf of individual interconnection customers for larger investment projects like Capital Grid. Please provide copies of any reports, documents, presentations, or analyses showing the ways in which Pepco has started to track these impacts.</p>	<p>Pepco does not have any reports, documents, presentations, or analyses demonstrating dedicated customer benefits in relation to larger investments.</p>
<p>Regarding the need for and design of screens for non-export or export-limited facilities, and the use of nameplate vs. export capacity in the screening process, does Pepco think the screens in IREC's 2023 Model Interconnection Procedures are sufficient to identify potential adverse system impacts during the screening process?</p>	<p>Pepco recommends discussing this topic at the upcoming Power Flow Study Technical Conferences.</p>
<p>In particular, does Pepco think the differentiation between nameplate capacity and export capacity in those screens, and the use of the inadvertent export screen, are sufficient for initial screening of adverse system impacts (including from inadvertent export)?</p>	<p>Pepco recommends discussing this topic at the upcoming Power Flow Study Technical Conferences.</p>
<p>In light of the Commission's encouragement to find areas of consensus and compromise, would Pepco reconsider its</p>	<p>There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations</p>

Question	Pepco's Response
recommendation for a separate working group and stakeholder process concerning the use of MSAs in DC?	like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
Are there currently provisions in the DC regulations or Pepco's tariff that prevent customers from installing MSAs? (please identify the specific regulations and/or tariff provisions).	There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
What are Pepco's concerns regarding MSA use among customers in DC?	There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
How do these concerns differ from those that have already been addressed by the Maryland working group process Pepco describes?	There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
Would any of Pepco's concerns be addressed by the suggestions DOEE made in its pre-technical conference questions to Pepco (pp. 26-27)? (Please note that in Pepco's original response, Pepco did not respond directly to DOEE's questions, but rather referenced its earlier general recommendation for a new stakeholder process in DC around.)	There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
Which of Pepco's concerns (if any) would not be addressed by DOEE's suggestions?	There are currently no regulations in D.C. that require Pepco to evaluate the use of MSAs, therefore Pepco does not evaluate MSA's in DC. If regulations like the ones in Maryland were adopted in DC regarding MSAs, Pepco would comply with those regulations.
Please provide copies of the results of the annual survey of developers, referenced on page 32 of the Technical Conference Compendium, for the last 5 years.	<p>Pepco recommends discussing this topic further at the upcoming Communications Technical Conferences.</p> <p>The annual Developer survey is conducted across all the PHI operating companies (Atlantic City Electric, Delmarva Power, and Pepco) and for Pepco includes both Maryland and DC developers. Results are not shown separately for DC and MD because the responses are limited and do not comprise a</p>

Question	Pepco's Response
	representative sample for the Pepco survey. For commercial audiences, online survey response rates tend to be low. A discussion of the overall results is best handled during the upcoming Communication Technical Conferences so that the qualitative feedback can be discussed.
<p>14. Pepco's responses on page 32 of the Technical Conference Compendium regarding the public queue do not match DOEE's understanding of the Pepco DC Interconnection Queue, available on the My Green Power Connection website, under the Developers & Contractors section. Pepco states in its answers that there is no public queue for projects 500 kW or below, but the Pepco DC Interconnection Queue includes "all Level II projects and above," including many projects under 500 kW (see screenshots below</p> <ul style="list-style-type: none"> - Is it possible that these answers were accidentally given in reference to the Pepco MD Interconnection Queue, rather than the Pepco DC Interconnection Queue? And if so, could Pepco provide responses to these questions based on the Pepco DC Interconnection Queue? 	<p>Pepco recommends discussing this topic further at the upcoming Public Queue Technical Conferences.</p> <p>Yes, it appears Pepco MD's queue was referenced incorrectly.</p> <p>Pepco has discussed MA's Interconnection Procedures to be quite dated (established in 2009) and have their own challenges. Pepco does not recommend pointing to other states as "best practices" but to evaluate system and stakeholder needs that are territory specific.</p>
IREC's Supplemental Questions	
<p>If a volt-watt function is deployed, is this offered as a mitigation solution to avoid the distribution system upgrades? Under which conditions would a volt-watt function not be deemed acceptable to mitigate a steady-state overvoltage limitation? How is the volt-watt function evaluated to determine whether it can effectively mitigate the overvoltage?</p>	<p>It could be offered as a site-specific mitigation solution. Conditions where the volt-watt curve fails to limit the voltage to limits in ANSI C84.1 or jurisdictional criteria as described in the PHI technical interconnection requirements in a safe and reliable manner. The volt-watt curve is tested in a (primary voltage) electrical model of the distribution system. Static power flow analysis is performed to determine if a volt watt curve prevents voltage from exceeding voltage limits in ANSI C84.1 or jurisdictional criteria as described in the PHI technical interconnection requirements in a safe and reliable manner.</p>
<p>If evaluation of a circuit for a non-export application reveal needed distribution system upgrades for issues not related to inadvertent export of the non-export system, does</p>	<p>Yes. In this specific instance described, the customer's DER is causing a reduction of net loading on the distribution system. Yes, in chapter 40, the level 3 application already provides a process for both non-export and</p>

Question	Pepco's Response
<p>PEPCO believe the non-export customer should pay for those upgrades? For instance, if the reduction in load due to the addition of the non-export system results in steady-state overvoltage due to other exporting systems backfeeding, should the non-export customer pay for the system upgrades to mitigate the overvoltage? Would PEPCO be open to exploring alternative cost allocation measures for such instances?</p>	<p>minimum import type applications. Maybe, if the cost allocation methods are simplified and not burdensome or costly on the utility to manage, administer, deploy and do not place the unmitigated grid expenses on the utility or an unjustified cost on utility rate payers.</p>
<p>Can PEPCO please describe how voltage fluctuation (flicker) would be evaluated with the nameplate rating of the system? Would the export capacity come into play at all in such evaluations? Would PEPCO simulations/evaluations assume that a single export-limited system is inadvertently exporting at one time or would all systems on the circuit be assumed to be inadvertently exporting at the same time?</p>	<p>Some examples of where nameplate is utilized include: the stiffness ratio at the point of interconnection would utilize system nameplate and available short circuit current at the point of interconnection to evaluate if a grid following inverter is at risk of causing voltage instability in a weak grid; non-export battery systems are evaluated at nameplate under charging conditions during peak load and minimum load to determine the magnitude of the voltage fluctuation. One at a time, unless circumstances dictated that a group of resources are at risk of inadvertently exporting at the same time, for example, an aggregation of DERs that respond to a common signal or event.</p>
<p>Can PEPCO please describe what the reverse power protection on the substation transformers is protecting against? That is, why can PEPCO not allow reverse power through the transformer?</p>	<p>Pepco substations distribution buses are networked together on distribution voltage side (typically 13.2KV class of voltage). Therefore, fault current will flow through distribution transformers back into the transmission systems for faults on the sub transmission supply circuits or remote substation faults supplied by the same sub transmission circuit. Pepco protection schemes must be sensitive enough to detect these faults at remote substations. If the Pepco fault detection scheme is triggered by a non-fault event, such as multiple DER back feeding power into the substation, the Pepco substation will disconnect and result in a substation outage (loss of power).</p>
<p>Can the substation reverse power protection settings be modified to allow for reverse current either as a distribution system upgrade in response to an interconnection request, or through longer term operational changes?</p>	<p>Yes, and Pepco may modify the protection settings as part of an interconnection request at the sole discretion of Pepco's protection and control department. Distribution system upgrades are offered as a means to interconnect when exceeding reverse power flow results in risk of the substation outage.</p>

Question	Pepco's Response
<p>Can PEPCO please describe potential safety or reliability impacts that they believe might be caused by inadvertent export? Can PEPCO please describe what kind of relaying they believe may be needed to prevent such impacts?</p>	<p>Temporary overloads or transitory power flows that are not mitigated quickly enough by the power control system of the DER site that damage equipment, increase system fault energy beyond PPE limits or cause equipment such as reclosers, network protectors, or relays to “trip” & outage parts of the distribution system. Directional power and/or directional overcurrent relaying that disconnects the DER quicker than: any upstream protective elements such as but not limited to network protectors, relays & reclosers, or in the case of large temporary thermal overloads or fault back feed, the damage withstands capability of the equipment(s).</p>

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Technical Conference Meeting Minutes has been served this May 30, 2025 on:

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