

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

ORDER

July 16, 2025

**FORMAL CASE NO. 1182, IN THE MATTER OF THE INVESTIGATION INTO THE
IMPLEMENTATION OF INTEGRATED DISTRIBUTION SYSTEM PLANNING FOR
ELECTRIC UTILITIES, Order No. 22464**

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) directs that an Integrated Distribution System Planning Working Group (“IDSP WG”) be convened within ninety (90) days of the date of this Order. The IDSP WG shall submit a Working Group Report as directed herein within 270 days, April 13, 2026, of the date of this Order. Interested persons not party to the IDSP WG shall submit comments on the IDSP WG Report within thirty (30) days of its filing and the Commission shall issue an order on IDSP within six (6) months of the submission of comments.

II. BACKGROUND

2. The Commission has emphasized the need for transparency and quality reporting in the distribution system of the utilities it regulates.¹ IDSP focuses on optimizing and modernizing the distribution system to meet evolving demands from ratepayers. In addition to the traditional distribution planning that the District of Columbia’s (“District”) utilities undertake, IDSP incorporates advanced technologies, data analytics, and distributed energy resources, such as solar panels, energy storage, electric vehicles, microgrids, demand response, energy efficiency, and federal and local policy. In Order No. 20286, the Commission determined that an interactive and stakeholder-informed process is necessary for distribution system planning.²

3. On October 10, 2024, the Commission issued Order No. 22313 directing the Potomac Electric Power Company (“Pepco”) and the Washington Gas Light Company (“WGL”)

¹ *Formal Case No. 1130, In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability (“Formal Case No. 1130”),* Order No. 20286, ¶ 37, issued January 24, 2020 (“Order No. 20286”) (“We agree with [] stakeholders that the DSP/NWA process must be an iterative one. . . [and] additional information, including the outcomes of the studies, must be continually factored into the DSP/NWA process to improve it and ensure that Pepco is considering all appropriate NWAs and DER integrations into its planned infrastructure improvements.”).

² *Formal Case No. 1130,* Order No. 20286, ¶ 37.

to submit revised Climate Solution Plans,³ dismissing the pending proposals without prejudice,⁴ and declining to adopt integrated planning frameworks.⁵ On November 12, 2024, the Office of the People’s Counsel for the District of Columbia (“OPC”) and the District of Columbia Government (“DCG”) filed motions for reconsideration of Order No. 22313 in *Formal Case No. 1167*.⁶ OPC’s Motion proposed restructuring *Formal Case No. 1167* to facilitate integrated, coordinated utility planning.⁷ DGC requested that the Commission create a separate docket for IDSP.⁸

4. The Commission issued the Notice of Inquiry (“NOI”) on November 27, 2024, creating a new case for IDSP, *Formal Case No. 1182*.⁹ The NOI invited interested persons to comment on various matters related to electric utility distribution system planning, IDSP, and the appended Commission-created Strawman Proposal. The NOI established a 60-day comment and 30-day reply comment period, making initial comments due on January 31, 2025, and reply comments due by February 28, 2025.¹⁰ On January 23, 2025, the Department of Energy and Environment’s (“DOEE”) filed an unopposed Motion requesting an enlargement of time to file initial and reply comments.¹¹ On January 31, 2025, the Commission issued Order No. 22359 granting DOEE’s request and extending the initial and reply comment period to March 17, 2025, and April 14, 2025, respectively.¹²

³ *Formal Case No. 1167, In the Matter of the Implementation of the Business Climate Plan* (“*Formal Case No. 1167*”), Order No. 22313, rel. ¶¶ 1, 19, October 10, 2024 (“Order No. 22313”).

⁴ Order No. 22313, ¶ 23.

⁵ *Formal Case No. 1167*, Dissent of Commissioner Beverly to Order No. 22313, ¶ 4 (“While I agree with the majority that the CBP and CSP should be dismissed without prejudice, I believe that does not go far enough to ensure this case is comprehensive, nor does it achieve the required integrated planning that we urgently need to comply with the District’s decarbonization mandates and policies.”).

⁶ *Formal Case No. 1167*, Order No. 22313, rel. October 10, 2024.

⁷ *Formal Case No. 1167*, Office of the People’s Counsel for the District of Columbia, Motion for Reconsideration of Public Service Commission Order No. 22313, at 9, filed November 12, 2024.

⁸ *Formal Case No. 1167*, District of Columbia Government, Motion for Reconsideration of Public Service Commission Order No. 22313, at 18, filed November 12, 2024.

⁹ *Formal Case No. 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities* (“*Formal Case No. 1182*”), Notice of Inquiry, rel. November 27, 2024.

¹⁰ On December 13, 2024, Commissioner Beverly filed a Letter of Inquiry in the *Formal Case No. 1182* docket inviting interested stakeholders to provide additional comment on a host of IDP-related questions and issues. *Formal Case No. 1182*, Inquiry of Commissioner Richard Beverly, filed December 13, 2024.

¹¹ *Formal Case No. 1182*, Unopposed Motion of the Department of Energy and Environment for Enlargement of Time to File Comments, filed January 23, 2025.

¹² *Formal Case No. 1182*, Order No. 22359, rel. January 31, 2025 (“Order No. 22359”).

5. On March 17, 2025, initial comments were filed by OPC,¹³ DOEE,¹⁴ GRID2.0 Working Group (“GRID2.0”),¹⁵ and Pepco.¹⁶ On April 14, 2025, reply comments were filed by DOEE,¹⁷ GRID2.0,¹⁸ and Pepco.¹⁹ Community comments were also filed.²⁰

III. DISCUSSION

A. Initial Comments

6. **OPC.** OPC supports developing IDSP in the District and seeks to work collaboratively with the Commission, Pepco, and fellow stakeholders. OPC breaks its comments down into five primary topics: (1) near and long-term objectives and planning criteria for IDSP; (2) IDSP action plans; (3) critical infrastructure information; (4) meaningful stakeholder engagement; and (5) responses to Commissioner Beverly’s questions.

7. OPC discusses eight subtopics related to near and long-term objectives and planning criteria for IDSP. First, OPC discusses planning criteria generally. OPC believes that Pepco’s existing planning criteria for system upgrades and its Distribution Standards Guideline 1442 should be incorporated into IDSP.²¹ OPC believes these existing planning criteria should be expanded to include near and long-term planning goals.²² OPC thinks that planning

¹³ *Formal Case No. 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities* (“*Formal Case No. 1182*”), OPC Comments, filed March 17, 2025 (“OPC Comments”).

¹⁴ *Formal Case No. 1182*, DOEE Comments with Synapse Memorandum, filed March 17, 2025 (“DOEE Comments” or “DOEE Synapse Memo”). (The Commission notes that the DOEE Comments do not include page numbers, but the DOEE Synapse Memorandum does. Therefore, the citations to DOEE Comments reference the PDF page number, and the citations to DOEE Synapse Memorandum reference the included page number.)

¹⁵ *Formal Case No. 1182*, GRID2.0 Working Group Initial Comments, filed March 17, 2025 (“GRID2.0 Comments”).

¹⁶ *Formal Case No. 1182*, Comments of Potomac Electric Power Company to Notice of Inquiry on Integrated Distribution Planning, filed March 17, 2025 (“Pepco Comments”).

¹⁷ *Formal Case No. 1182*, DOEE Reply Comments, filed April 14, 2025 (“DOEE Reply Comments”).

¹⁸ *Formal Case No. 1182*, GRID2.0 Reply Comments, filed April 14, 2025 (“GRID2.0 Reply Comments”).

¹⁹ *Formal Case No. 1182*, Reply Comments of Potomac Electric Power Company to Notice of Inquiry on Integrated Distribution Planning, filed April 14, 2025 (“Pepco Reply Comments”).

²⁰ *Formal Case No. 1182*, Comments to the Commission filed individually by Don Bronkema, Rachael Gorlin, Leonard Rubin, John Curtis, Lino Martinez, Paula Hirschhoff, Jason Miller, Elia Garcia McComie, Sydney Bronaugh, Kristen Hengtgen, Michael Cleary, Karl Fellenius, Deirdre Joy, John Wiggins, Cara Fultons, Vincent Lampones, Bridget Donovan, Mustafa Abdullah, Claire Mills, James Driver, Anne Debuys, and Claire Hackers, Suzanne DeFelice, Ayla Frost, Gawain Kripke, Linda VerNooy, Morgan Corey, Philip Downey, Diana Schoder, Shayna Gleason, and Evan Kenyon filed between April 9 and May 9, 2025 (“Interested Resident’s Comments”).

²¹ OPC Comments at 4.

²² OPC Comments at 4.

criteria should include upgrades to software, communication platforms, advanced distribution management systems, advanced Distribution Energy Resource (“DER”) analysis, and geographic information systems, all of which will enable the use of Distribution Energy Resource Management Systems (“DERMS”).²³ OPC states that all additions and changes to the system should be based on these planning criteria. OPC argues that stakeholder engagement is needed to understand the criteria and how they justify changes.²⁴

8. With respect to the Annual Consolidated Report (“ACR”), OPC argues that planning studies for electric utilities often have a common format, which starts with historical data, load forecasting, and planning criteria.²⁵ OPC claims that historical data can be used to justify modifications by identifying current issues with the system.²⁶ OPC highlights that some utilities use probabilistic load forecasting, but Pepco does not and does not project energy savings from future goals in its load forecasting.²⁷ OPC claims the ACR contains much information that needs to be retained and could be expanded to address things like Sulfur Hexafluoride gas, which is known to leak from components.²⁸ OPC argues that for stakeholders to determine compliance with planning criteria, it is important to understand the capacity of substations.²⁹ OPC argues that pole miles of overhead line and underground cables should be given and include details like miles of cable by voltage, number of phases, and insulation type.³⁰ Additionally, OPC believes IDSP should include budgeted and final costs for capital projects.³¹

9. OPC next addresses the Distribution Construction Program Report. OPC claims that load forecasting is the baseline for any system planning study.³² OPC highlights that Pepco already does short-range and long-range planning designs at the feeder level in their confidential distribution Construction Program Report, which it uses to determine specific upgrades.³³ OPC argues that including this report in IDSP would improve transparency and stakeholder understanding of the capital investment that comes from the report.³⁴ OPC believes the

²³ OPC Comments at 4-5.

²⁴ OPC Comments at 5.

²⁵ OPC Comments at 5.

²⁶ OPC Comments at 5.

²⁷ OPC Comments at 5.

²⁸ OPC Comments at 6.

²⁹ OPC Comments at 6.

³⁰ OPC Comments at 6.

³¹ OPC Comments at 6.

³² OPC Comments at 7.

³³ OPC Comments at 7.

³⁴ OPC Comments at 7.

Distribution Construction Program Report and the Transmission & Distribution 10-Year Planning Study should be included in a format without maps and drawings.³⁵ OPC also believes IDSP should address the District of Columbia Power Line Undergrounding activities, plans for 4kV conversion, and priority feeders.³⁶ OPC argues that Pepco should include capital expenditures by executive categories, as it does in its rate cases.³⁷

10. OPC discusses the importance of different load forecasts for IDSP. First, OPC addresses load forecasting for DER. OPC asserts that Pepco should provide the information derived from Distribution System Planning Load Forecasting (“DSP-LF”) for peak demand and, to the extent included in DSP-LF, include the MWH reduction from the existing and predicted DERs by feeder.³⁸ OPC then addresses load forecasting for prospective electrification projects, highlighting that customer response to legislative actions is difficult to project and that these types of projections should not be required.³⁹ OPC believes Pepco should adjust its forecasts in each subsequent IDSP as customer response to program implementation gains traction within the community.⁴⁰ OPC argues that load forecasting for electric vehicles should be considered in IDSP by including load projections for electric vehicle demand by feeder and substation, including assumed coincident peak loading assignment to Level 1, 2, and 3 chargers.⁴¹ OPC argues that a localized load forecast should be used since different demographics will adopt EVs at different paces.⁴²

11. OPC’s second primary issue is IDSP action plans. OPC argues that any proposals for grid modifications, including two-way power flows and real-time interfacing with controlled devices behind the customer’s meter, must be considered when there is a demonstrated tangible cost benefit to the customer.⁴³ OPC asserts that IDSP Criteria should include clear needs, goals, and verifiable cost benefits for proposed grid modernization projects.⁴⁴ OPC argues that capital projects need to be prioritized with the IDSP.⁴⁵ OPC considers the 5-Year Action Plan format to

³⁵ OPC Comments at 9.

³⁶ OPC Comments at 10.

³⁷ OPC Comments at 10.

³⁸ OPC Comments at 7.

³⁹ OPC Comments at 8.

⁴⁰ OPC Comments at 8.

⁴¹ OPC Comments at 8.

⁴² OPC Comments at 9.

⁴³ OPC Comments at 10.

⁴⁴ OPC Comments at 11.

⁴⁵ OPC Comments at 11.

contain a reasonable level of reporting that describes the priorities of the projects and portfolios.⁴⁶

12. OPC argues that IDSP should address cost-effective and affordable capital upgrades, maintenance expenditures, system performance, and plans for the adoption of new technologies.⁴⁷ OPC believes that a benefit-cost analysis methodology should evaluate IDSP projects that the Commission develops according to the Modernizing the Energy Delivery System for Increased Sustainability (“MEDSIS”) Working Group’s recommendations.⁴⁸ OPC argues that certain upgrades can be justified through benefit-cost analysis, whereas others cannot.⁴⁹

13. OPC asserts that the current five-year climate action plan contains portfolios that should describe how the topic benefits from reducing Greenhouse Gas (“GHG”) emissions.⁵⁰ The portfolios should also identify the District goals that the portfolio programs address.⁵¹ Additionally, they should describe Pepco’s and other key stakeholders’ roles in activating the changes required to meet District goals. Lastly, they should provide a description of the initiatives included in the portfolio.⁵²

14. OPC contends that IDSP would be an excellent vehicle for providing transparency to the system’s hosting capabilities and limits.⁵³ OPC argues that DER hosting maps should be expanded to address communication/monitoring requirements, thus ensuring transparency.⁵⁴ OPC believes that demonstration programs may be viable and should be included within the IDSP to clearly show the prioritization of these projects relative to other grid modernization initiatives.⁵⁵

15. With respect to Critical Infrastructure Information (“CII”), OPC suggests a secure web-based server be made available to certain parties.⁵⁶ OPC asserts that IDPS could be organized so the CII data is contained in appendices to allow easy redaction of CII information.⁵⁷ The

⁴⁶ OPC Comments at 11.

⁴⁷ OPC Comments at 11-12.

⁴⁸ OPC Comments at 12.

⁴⁹ OPC Comments at 12.

⁵⁰ OPC Comments at 12.

⁵¹ OPC Comments at 12.

⁵² OPC Comments at 12.

⁵³ OPC Comments at 13.

⁵⁴ OPC Comments at 13.

⁵⁵ OPC Comments at 13.

⁵⁶ OPC Comments at 14.

⁵⁷ OPC Comments at 14.

information included in this would be the distribution Construction Program Report and the Transmission & Distribution 10-year Planning Study (“T&DPS”), and feeder forecast.⁵⁸ OPC also asserts that adding the location on a map of significant upgrades would add quality and transparency.⁵⁹ OPC argues that heat maps displaying DER concentrations and EV concentrations would help in understanding DER and EV growth within the District.⁶⁰ OPC argues that details about DER, EV, and new business loads can be available in a secure appendix, while the heat map can be a public-facing document.⁶¹

16. OPC asserts the process must be designed to allow for meaningful collaboration between Pepco and stakeholders.⁶² OPC argues that the Commission should require that Pepco’s planning models incorporate stakeholder recommendations or show the adverse impacts of such recommendations and reasonableness for rejecting them.⁶³

17. Finally, OPC addresses several of Commissioner Beverly’s questions. First, OPC asserts that a three-year IDSP filing requirement makes sense based on how long it takes to complete planning studies.⁶⁴ OPC believes that reporting on polychlorinated biphenyls will unlikely improve system planning or add value to the IDSP. OPC argues that system monitoring and communication with field devices through Supervisory Control and Data Acquisitions (“SCADA”) is important to grid modernization.⁶⁵ Historical reporting within the IDSP should include the status of these capabilities, not limited to SCADA, and downline devices.⁶⁶ OPC states that load forecasting for capacity planning generally focuses on non-coincident peaking loading, meaning coincident peak load is only by certain developers.⁶⁷ While OPC argues that knowing private charger locations is unnecessary for stakeholders, OPC contends that reporting publicly available chargers, especially those that Pepco helps facilitate through existing programs, has value in observing where investments are made throughout the District.⁶⁸ OPC asserts that reporting the implementation of cost reduction in energy purchases should only be provided when conducting new pilot programs or when there are significant changes or expansions to existing

⁵⁸ OPC Comments at 14.

⁵⁹ OPC Comments at 14.

⁶⁰ OPC Comments at 14.

⁶¹ OPC Comments at 14.

⁶² OPC Comments at 15.

⁶³ OPC Comments at 15.

⁶⁴ OPC Comments at 15-16.

⁶⁵ OPC Comments at 16.

⁶⁶ OPC Comments at 16.

⁶⁷ OPC Comments at 16.

⁶⁸ OPC Comments at 16-17.

programs.⁶⁹ Lastly, OPC argues that heat maps displaying Customers Experiencing Multiple Interruptions (“CEMI-3”), DER concentrations, and load growth (new business loads) are examples of data that can help stakeholders understand the system’s nature while maintaining privacy and security.⁷⁰

18. **DOEE.** DOEE’s comments include a memorandum written by Synapse Energy Economics, Inc. (“Synapse”). DOEE provided brief comments in support of the Commission’s intent to implement an IDSP and concurs with Synapse’s more comprehensive analysis and recommendations relating to IDSP.⁷¹ Synapse provided analysis and recommendations on the NOI stating that it intends to align the Strawman Proposal with best practices, identify areas for improvement, and provide recommendations on how to implement the best practices.⁷² Synapse cites Lawrence Berkeley National Laboratory’s report titled *State Requirements for Electric Distribution System Planning*, as a resource for best practices when implementing IDSP. Synapse states that the report recommends the following: establish roles and responsibilities, define objectives, enumerate reporting requirements, and require coordination between IDSP and other planning processes.⁷³ Synapse states that the report recommends a decision framework based on the following: progress to date and future expectations; stakeholder engagement process for sharing information, collecting input, and integrating feedback; prioritization framework for selecting investments based on needs and objectives; and an action plan for short-and-medium term planning horizons linked to stated objectives and goals.⁷⁴

19. Synapse observes that IDSP does not include specific directions regarding when and how Pepco will collaborate with DCG in developing the IDSP and monitoring its impact and implementation. Synapse states that a deeper and sustained level of collaboration between Pepco and DCG is necessary to align energy planning efforts.⁷⁵ Synapse suggests that Pepco and DOEE, or other DCG agencies, should coordinate on the IDSP, DOEE’s Strategic Electrification Roadmap, and Clean Energy DC 2.0.⁷⁶ Synapse recommends that Pepco and DCG meet and develop a joint proposal for the Commission to consider regarding collaboration around the preparation and implementation of IDSP.⁷⁷

20. Synapse states that the objectives and goals of the IDSP should be more consistent

⁶⁹ OPC Comments at 17.

⁷⁰ OPC Comments at 17-18.

⁷¹ DOEE Comments at 3-4.

⁷² DOEE Synapse Memo at 3.

⁷³ DOEE Synapse Memo at 4.

⁷⁴ DOEE Synapse Memo at 4.

⁷⁵ DOEE Synapse Memo at 5.

⁷⁶ DOEE Synapse Memo at 5.

⁷⁷ DOEE Synapse Memo at 5.

and comprehensive.⁷⁸ Synapse notes that some priorities are discussed through the NOI but are not present in the Strawman Proposal.⁷⁹ Synapse recommends that the IDSP include specific references to the District's energy-related legislation and should reference the specific goals included in the District's energy-related legislation.⁸⁰ In addition, the IDSP should include a definitions section that includes acronyms and concepts to specify the process of how or what technologies should be considered to achieve the goals of the IDSP.⁸¹

21. Synapse also recommends more reporting requirements and more specificity in the reporting requirements.⁸² Synapse recommends adding specificity and clear directives related to: load forecasting scenarios; temporal and locational granularity for load forecasting requirements, hosting capacity analysis, and consideration of Non-Wire Alternatives ("NWA"); detailed information about monitoring and measurement capabilities; grids needs assessment and prioritization as a separate component; consideration of possible solutions and related documentation including detailed explanations; cost-effectiveness screening with approved frameworks and methodologies.⁸³ Synapse recommends including additional metrics to reflect elements of distribution system performance such as DER interconnection timelines and load energization timelines.⁸⁴ Synapse also recommends that Pepco and DOEE develop a joint proposal for when and how Pepco and DOEE will confer to change IDSP metric and reporting.⁸⁵

22. Synapse considers best practices for stakeholder engagement to be more comprehensive than those included in the Strawman Proposal.⁸⁶ Synapse recommends defining the roles and responsibilities of DOEE and Pepco in the IDSP. Synapse also recommends that the Commission: rename "Interested Party Outreach" to "Stakeholder Roles and Engagement," create and define a stakeholder advisory council and provide them with an advance draft of the IDSP months before filing; increase the number of pre-filing stakeholder meetings; include an appendix to the IDSP with stakeholder recommendations, recommendations included, recommendations excluded, and an explanation for each; and add stakeholder meetings post-filing.⁸⁷ Synapse also recommends that the Commission specify its role in the IDSP process.⁸⁸ Finally, Synapse

⁷⁸ DOEE Synapse Memo at 5.

⁷⁹ DOEE Synapse Memo at 5.

⁸⁰ DOEE Synapse Memo at 6.

⁸¹ DOEE Synapse Memo at 6.

⁸² DOEE Synapse Memo at 7.

⁸³ DOEE Synapse Memo at 7.

⁸⁴ DOEE Synapse Memo at 8.

⁸⁵ DOEE Synapse Memo at 8.

⁸⁶ DOEE Synapse Memo at 8.

⁸⁷ DOEE Synapse Memo at 9.

⁸⁸ DOEE Synapse Memo at 10.

recommends that the IDSP include a section on coordination across proceedings and how other proceedings should integrate with the IDSP.⁸⁹

23. **GRID2.0.** GRID2.0 is generally in support of the purpose of the IDSP but provides recommendations on how to increase transparency and support the District's energy goals.⁹⁰ GRID2.0 suggests that the IDSP should include policies that guide the operation and the build-out of grid infrastructure to the extent that the policies require the utility to describe how specific investments result in specific power system improvements.⁹¹ GRID2.0 recommends including language in the IDSP that encourages granular data on sustainable energy sources and that the IDSP should be organized and supported by data and findings related to parties' deliberations on prudence.⁹² In addition, GRID2.0 generally agrees with the guiding principles of the NOI but suggests the following to enhance the effectiveness of the IDSP: the filing interval should be dynamic and take into consideration other plans and dockets; there should be significant concurrence among the parties about key findings that underpin the IDSP; the IDSP should include a fifth principle based on the seven guiding principles of MEDSIS.⁹³ GRID2.0 supports a utility-created IDSP but cautions that third parties must be able to access key data on the system's performance and forecasting to determine the practicality of NWA and/or DER strategies.⁹⁴

24. GRID2.0 suggests specific changes to the Strawman Proposal. On the purpose of the IDSP: GRID2.0 states that it is unclear how NWA/DER strategies can be identified and evaluated; the purpose of the IDSP dovetails with the purpose of the Benefit-Cost Analysis ("BCA"); the BCA should be explicitly stated as necessary to support choices affecting grid modernization and capital investment.⁹⁵ On the objectives of the IDSP: GRID2.0 recommends changing Objective 1 from "goals" to "laws"; GRID2.0 suggests that *Formal Case Nos. 1167* and *1182* should be closely aligned, and GRID2.0 supports Objective 6 and notes that data sharing among stakeholders is essential to objective analysis of the distribution system plans.⁹⁶

25. With regard to stakeholder engagement, GRID2.0 argues that the pre- and post-filing outreach and comment periods do not provide sufficient opportunity for third parties to engage and understand Pepco's forecasts, grid constraints, proposed maintenance, and capital investments.⁹⁷ GRID2.0 recommends a multi-week secure process where data is made available

⁸⁹ DOEE Synapse Memo at 11.

⁹⁰ GRID2.0 Comments at 1.

⁹¹ GRID2.0 Comments at 1.

⁹² GRID2.0 Comments at 2.

⁹³ GRID2.0 Comments at 3-4.

⁹⁴ GRID2.0 Comments at 4.

⁹⁵ GRID2.0 Comments at 4.

⁹⁶ GRID2.0 Comments at 4-5.

to energy service companies and third parties with status to provide services to the grid that can meet the objectives of the IDSP.⁹⁸ GRID2.0 also suggests that the IDSP should enable engagement with energy service companies and other third parties to identify where NWAs may be deployed.⁹⁹ GRID2.0 recommends that the lessons learned from PowerPath DC in *Formal Case No. 1130* be implemented in the formulation of an IDSP.¹⁰⁰

26. For the Distribution System Overview, GRID2.0 requests that data should be consistently organized and available at the most granular level appropriate.¹⁰¹ GRID2.0 recommends that the feeder characterization should be robust to enable comparison of options for energy management and should include specific data including peak demand, SCADA capability, and hosting capacity analysis, among other data.¹⁰² For the IDSP Action Plan, GRID2.0 generally recommends that all data be required to be identified at the feeder level if possible or otherwise as granular as appropriate to conduct evaluation and comparison of the energy management options.¹⁰³ GRID2.0 recommends that load and DER forecasting allow comparison of energy management options to address new load and congestion constraints.¹⁰⁴ GRID2.0 recommends that customer affordability efforts should specify where public education is constructive.¹⁰⁵ With regard to data organized by substation or a higher scale, GRID2.0 recommends that the IDSP includes a ranking of grid needs for prioritization and known or expected future asset changes to the distribution system.¹⁰⁶

27. Finally, GRID2.0 suggests additional requirements for the IDSP. GRID2.0 states that the result of the IDSP must satisfy the primary goal: to address the District's clean energy policies and goals.¹⁰⁷ GRID2.0 recommends that the Commission review the draft Action Plan for acceptance with an evaluation of the robustness and prudence of NWA/DER strategies in the Action Plan.¹⁰⁸ GRID2.0 also recommends that the Commission perform iterative reviews of the utility's process for identifying when or how existing major equipment is changed.¹⁰⁹ GRID2.0

⁹⁷ GRID2.0 Comments at 5.

⁹⁸ GRID2.0 Comments at 5.

⁹⁹ GRID2.0 Comments at 5.

¹⁰⁰ GRID2.0 Comments at 5.

¹⁰¹ GRID2.0 Comments at 5.

¹⁰² GRID2.0 Comments at 6.

¹⁰³ GRID2.0 Comments at 6.

¹⁰⁴ GRID2.0 Comments at 6.

¹⁰⁵ GRID2.0 Comments at 6.

¹⁰⁶ GRID2.0 Comments at 7.

¹⁰⁷ GRID2.0 Comments at 7.

¹⁰⁸ GRID2.0 Comments at 7.

recommends that the Commission highlight concerns raised by other parties.¹¹⁰ GRID2.0 recommends a rulemaking for the procedure, filing requirements, and evaluation of the IDSP.¹¹¹

28. **Pepco.** Pepco asserts that it primarily supports the objectives of the IDSP proceeding, wants to work collaboratively with stakeholders and bring its experience and lessons learned working in Maryland to this proceeding.¹¹² Pepco starts by identifying opportunities to consolidate data from existing reports into the IDSP and remove outdated reporting requirements to enable the Commission and stakeholders to more efficiently review Company reports.¹¹³ Specifically, Pepco recommends that it be permitted to file the reports on Annual Distribution Transformers, Advanced Meter Infrastructure, Annual Capital Grid, EQSS, and Location Constraints within IDSP instead of appended to the ACR.¹¹⁴

29. Pepco seeks clarification as to how Commission and stakeholder feedback will impact its distribution planning. Recognizing the need for stakeholder engagement and the Commission directed comment periods, Pepco asserts that “it is imperative that the incorporation of input from stakeholders result in minimal disruption to Pepco’s distribution planning process, including distribution system planning.”¹¹⁵ Pepco requests clarification that it will have sufficient time to incorporate stakeholder feedback into future planning and that it retains ultimate decision-making authority as to what to incorporate based on its expertise and responsibility to provide safe and reliable service.¹¹⁶

30. Due to the breadth of the Strawman Proposal, Pepco recommends that the Commission redefine the process as an “Integrated Distribution Process” or “IDP,” asserting that removing the word “system” better reflects “the encompassing nature of the IDSP so as not to confuse it with traditional distribution system planning processes.”¹¹⁷ Pepco notes that it is participating in the distribution system planning working group in Maryland, which has been active since 2021; asserting that “there are opportunities to align distribution system planning portion of the Districts IDSP to conserve both Company and stakeholder resources.”¹¹⁸ Pepco adds that, because the Strawman may include CII, the proposal should recognize “that the

¹⁰⁹ GRID2.0 Comments at 7.

¹¹⁰ GRID2.0 Comments at 7.

¹¹¹ GRID2.0 Comments at 7.

¹¹² Pepco Comments at 4.

¹¹³ Pepco Comments at 4.

¹¹⁴ Pepco Comments at 4-6.

¹¹⁵ Pepco Comments at 7.

¹¹⁶ Pepco Comments at 7.

¹¹⁷ Pepco Comments at 7.

¹¹⁸ Pepco Comments at 8-9.

Company will need to limit disclosure” which could “threaten the distribution system and the competitive market for vendors.”¹¹⁹

31. Pepco expresses its support for the proposed filing schedule included in the Strawman Proposal, which contemplates the Company filing an IDSP every 3 years (with a 5-year plan and an extended 10-15 year outlook).¹²⁰ Pepco notes that the Strawman Provides for annual updates “to capture deviations and updates . . . such as changes in load forecasts, spending projections, . . .reliability projections, [mapping, and the] projected list of projects.”¹²¹ Recognizing that there are items that the Company is unable to provide, Pepco offers alternatives and suggests that the “annual updates focus only on changes or modifications made since the last IDSP filing” and be filed at least 3 months into the calendar year.¹²²

32. Pepco asserts that the Strawman identifies two main categories of information “Distribution System Overview” and “IDSP Action Plans.” Under Distribution System Overview, there are seven data collection elements. Pepco contends that it does not currently collect data on four of the elements;¹²³ specifically, health and condition, operations and programs, resource challenges, and environmental justice mapping analysis.¹²⁴ Pepco proposes that it provides historical information on alternative elements that it asserts “are consistent with the data the Company currently collects,” including reliability metrics, Operation and Maintenance (“O&M”) and capital spending, and outage events affecting >1% of customer base in the District.¹²⁵

33. With respect to the nine elements in the IDSP Action Plans category, Pepco asserts that it does not collect data on three elements, including forecasted reliability metrics (5- and 10-year projections), forecasted O&M and capital spend projections (5- and 10 projections), and resilience approach and planning.¹²⁶ As an alternative, Pepco proposes that it provides information on load forecast, forecasted workforce and material resources, anticipated changes to operations and programs from the operations and programs section, grid modernization efforts, hosting capacity analysis, and customer affordability analysis.¹²⁷

34. Pepco asserts that it generally supports the third-party and community outreach

¹¹⁹ Pepco Comments at 9.

¹²⁰ Pepco Comments at 9.

¹²¹ Pepco Comments at 9.

¹²² Pepco Comments at 9-10.

¹²³ Pepco Comments at 10.

¹²⁴ Pepco Comments at 10-12.

¹²⁵ Pepco Comments at 13.

¹²⁶ Pepco Comments at 13-15.

¹²⁷ Pepco Reply Comments at 15-17.

contemplated in the Strawman Proposal, subject to clarifications requested regarding the role Commission and stakeholder feedback will play in the Company's ability to retain decision-making control over distribution planning.¹²⁸ Finally, Pepco recommends that the Commission convene a working group to discuss the recommendations proposed in its filing.¹²⁹

B. Reply Comments

35. **DOEE.** DOEE's Reply Comments provide its recommendation for the next steps of the proceeding to more fully develop the specifications to include in the IDSP. DOEE asserts that more analysis, collaboration, another round of comments, and a technical workshop will be required to provide a detailed framework for IDSP.¹³⁰ DOEE specifically recommends the following five actions: (1) the Commission should direct the initial commenters to meet and confer regarding the development of the IDSP, (2) the parties should file a joint report on the consensus and non-consensus recommendations, (3) the Commission should hold a technical conference to review and discuss the proposals, (4) the Commission should solicit a final round of party recommendations after the technical conference, close the record and make a final decision thereafter, (5) the Commission or the Council of the District of Columbia should establish a deadline of 6 months after final party recommendations are received for finalizing the process and requirements for the IDSP.¹³¹

36. DOEE first suggests that additional work is needed to develop a full IDSP.¹³² DOEE argues that the NOI does not include details that are critical for an informative and effective IDSP.¹³³ DOEE supports OPC's recommendations regarding grid modernization but notes that the docket so far does not reflect actions and objectives for grid modernization within IDSP.¹³⁴ DOEE also agrees with the need for more review of Pepco's current forecasting methodologies.¹³⁵ DOEE asserts that stakeholders require additional information to determine the results of Pepco's current NWA process.¹³⁶ DOEE agrees with some of Pepco's suggestions, primarily that the Maryland DSP proposals could provide a launching point for key details not yet specified in *Formal Case No. 1182*.¹³⁷ DOEE requests that the Commission facilitate more detailed discussion among the parties to clarify, organize, and consolidate recommendations of the consensus or other

¹²⁸ Pepco Comments at 18.

¹²⁹ Pepco Comments at 18.

¹³⁰ DOEE Reply Comments at 2.

¹³¹ DOEE Reply Comments at 2.

¹³² DOEE Reply Comments at 3.

¹³³ DOEE Reply Comments at 3.

¹³⁴ DOEE Reply Comments at 4.

¹³⁵ DOEE Reply Comments at 5.

¹³⁶ DOEE Reply Comments at 5, 6.

¹³⁷ DOEE Reply Comments at 5.

options for the Commission to consider.¹³⁸

37. DOEE also suggests that the Commission use this opportunity to learn from developments in Maryland and other jurisdictions.¹³⁹ DOEE attached information from the ongoing IDSP process in Maryland as Attachments A, B, and C to its Reply Comments.¹⁴⁰ DOEE also attached IDSP requirements from New York, Attachment D, and Minnesota, Attachment E.¹⁴¹ DOEE stated that it included these Attachments to provide examples of existing IDSP frameworks that the parties can use to develop their recommendations in this case.¹⁴²

38. Finally, DOEE requests that the Commission direct the parties to meet and confer, establish a technical conference, and solicit a final round of comments from the parties.¹⁴³ DOEE agrees with Pepco that additional discussion would be beneficial, but does not support a working group approach.¹⁴⁴ DOEE requests that the Commission initiate a time-bound process with definitive timelines to promote the completion of this investigation.¹⁴⁵ DOEE believes that its proposed procedure would provide more opportunities to develop recommendations for the Commission to review than have been submitted so far.¹⁴⁶

39. **GRID2.0.** GRID2.0 asserts that it generally supports OPC's initial comments, including OPC's recommendation for system planning criteria.¹⁴⁷ It also observes that the planning criteria for any of the reports that Pepco currently submits to the Commission and is recommended for incorporation into the IDSP should be referenced.¹⁴⁸ GRID2.0 argues that the Commission should establish formal system planning with enough detail that it can be expected to shape the resulting IDSP.¹⁴⁹

40. GRID2.0 agrees with OPC that it makes sense for Pepco to provide load

¹³⁸ DOEE Reply Comments at 6.

¹³⁹ DOEE Reply Comments at 6.

¹⁴⁰ DOEE Reply Comments at 7, Attachments A-C.

¹⁴¹ DOEE Reply Comments at 7, Attachments D, E.

¹⁴² DOEE Reply Comments at 9.

¹⁴³ DOEE Reply Comments at 9.

¹⁴⁴ DOEE Reply Comments at 10.

¹⁴⁵ DOEE Reply Comments at 9.

¹⁴⁶ DOEE Reply Comments at 10.

¹⁴⁷ GRID2.0 Reply Comments at 3.

¹⁴⁸ GRID2.0 Reply Comments at 3.

¹⁴⁹ GRID2.0 Reply Comments at 3.

projections at the feeder level, taking into account the functionality of DER for peak demand and including the MWH reduction from the existing and predicted DERs by feeder.¹⁵⁰

41. GRID2.0 states that DER grid service functionality can be managed more or less actively.¹⁵¹ Different scenarios need to be analyzed and captured in the IDSP. GRID2.0 provides the example of a battery installation representing a potential grid resource, which becomes an existing one when interconnected to a DERMS.¹⁵² Analyzing these potential scenarios becomes especially useful when paired with the information in T&DPS, which tells what feeder replacements or upgrades are planned.¹⁵³ Distinguishing between passive and active DER management will help determine the necessity of certain investments and upgrades.¹⁵⁴

42. GRID2.0 strongly agrees with OPC that increasing control devices, two-way power flows, and dynamic loads present new challenges to grid safety and opportunities to optimize grid use.¹⁵⁵ GRID2.0 conditionally agrees with Pepco that grid modifications involving two-way power flow and behind-the-meter control devices must only be considered when there is a demonstrated, tangible benefit to the customer.¹⁵⁶ GRID2.0 believes that cost-benefit analysis is essential for this and should not simply be limited to the monthly bill statement, but should consider other tangible benefits to the customer.¹⁵⁷ GRID2.0 believes that OPC's comments on affordability, climate action, and hosting capacity analysis are important to consider in a cost-benefit analysis.¹⁵⁸

43. GRID2.0 believes that it and OPC are aligned on the need for meaningful stakeholder collaboration.¹⁵⁹ It also thinks that the Commission should require Pepco to produce planning models that incorporate stakeholder suggestions or show the adverse impacts of such recommendations and the reasonableness of rejecting them.¹⁶⁰ GRID2.0 believes that disagreements will arise regarding grid design objectives like affordability, peak demand, and reliability. This information can be identified and docketed in *Formal Case No. 1182*, but it

¹⁵⁰ GRID2.0 Reply Comments at 3.

¹⁵¹ GRID2.0 Reply Comments at 3.

¹⁵² GRID2.0 Reply Comments at 3-4.

¹⁵³ GRID2.0 Reply Comments at 4.

¹⁵⁴ GRID2.0 Reply Comments at 4.

¹⁵⁵ GRID2.0 Reply Comments at 4.

¹⁵⁶ GRID2.0 Reply Comments at 4.

¹⁵⁷ GRID2.0 Reply Comments at 4.

¹⁵⁸ GRID2.0 Reply Comments at 4.

¹⁵⁹ GRID2.0 Reply Comments at 5.

¹⁶⁰ GRID2.0 Reply Comments at 5.

should be addressed in subsequent rate cases, as *Formal Case No.1182* is meant to be a non-contested docket.¹⁶¹

44. GRID2.0 is also generally supportive of DOEE's Initial Comments on *Formal Case No. 1182*.¹⁶² GRID2.0 agrees with DOEE's recommendation for a much deeper, sustained collaboration between Pepco and DC Government agencies to align planning efforts with district policy.¹⁶³ GRID2.0 asserts that following this recommendation will lead to the development of a high-quality IDSP.¹⁶⁴

45. GRID2.0 agrees with DOEE that there should be coordination across proceedings and that ensuring progress in IDSP implementation is key to aligning stakeholders and creating a smarter and more effective electric grid design in the District.¹⁶⁵ GRID2.0 agrees that it is shocking that Commission dockets operate effectively independently from the DOEE policy apparatus and the sustainable energy utility.¹⁶⁶ GRID2.0 believes this is an opportunity to align all the initiatives so that District energy policy becomes more comprehensible and cohesive. GRID2.0 asserts that IDSP could act as the master conductor for how the District meets the challenges of an evolving energy landscape.¹⁶⁷

46. GRID2.0 responds to each NOI subtopic that Pepco initially commented on, agreeing with Pepco on some things and disagreeing on others. GRID2.0 agrees with Pepco that condensing both the reporting and the synthesis of information from the reports identified by Pepco into IDSP will be more efficient for Pepco and result in better information alignment.¹⁶⁸ GRID2.0 recommends adding the Distribution Constitution Program Report and the Transmission & Distribution 10-Year Planning Study to IDSP.¹⁶⁹

47. GRID2.0 takes issue with Pepco's assertion that it needs the Commission's assurance that the impact of stakeholder comments is limited to changes in the system's reporting requirements and not to its planning.¹⁷⁰ GRID2.0 contends this position is antithetical to engaging stakeholders, asserting that stakeholder involvement is integral to identifying grid modernization

¹⁶¹ GRID2.0 Reply Comments at 5.

¹⁶² GRID2.0 Reply Comments at 5.

¹⁶³ GRID2.0 Reply Comments at 5.

¹⁶⁴ GRID2.0 Reply Comments at 5.

¹⁶⁵ GRID2.0 Reply Comments at 5-6.

¹⁶⁶ GRID2.0 Reply Comments at 6.

¹⁶⁷ GRID2.0 Reply Comments at 6.

¹⁶⁸ GRID2.0 Reply Comments at 6.

¹⁶⁹ GRID2.0 Reply Comments at 6.

¹⁷⁰ GRID2.0 Reply Comments at 6-7.

strategies overlooked by the Company. GRID2.0 argues that a major reason for this proceeding and the involvement of stakeholders in IDSP is to allow for thoughtful consideration of alternatives.¹⁷¹ GRID2.0 asserts the process should be considered consultative and not disruptive to Pepco's distribution planning process.¹⁷²

48. GRID2.0 argues that the stakeholder process should establish various scenarios that the utility needs to analyze in detail, and a cost-benefit analysis to inform future rate cases on whether Pepco's proposed grid projects and operations are prudent in light of alternative strategies.¹⁷³ GRID2.0 argues that currently, cost-of-service reporting creates a bias toward capital expenditures, historically categorized by building up the distribution grid.¹⁷⁴ GRID2.0 asserts more weight should be given to non-capital strategic alternatives, like NWAs.¹⁷⁵ GRID2.0 strongly believes that allowing third parties to evaluate the system and consult on possible NWAs will ultimately be more cost-effective in meeting IDSP goals.¹⁷⁶

49. GRID2.0 agrees with Pepco that *Formal Case No. 1182* IDSP does not create a requirement for Commission approval or limit the Company's ability to execute its distribution plans.¹⁷⁷ GRID2.0 reiterates its recommendation that the *Formal Case No. 1182* docket and final guidance for IDSP make possible the comparison of alternatives, including an evaluation of various scenarios prepared by Pepco and by third parties with access to privileged information and system conditions, needs, and constraints.¹⁷⁸

50. GRID2.0 agrees with Pepco's concerns regarding CII.¹⁷⁹ GRID2.0 asserts there will definitely be information that should not be available to the general public, but it argues access to the information should be granted to key parties in *Formal Case No. 1182*. This information would only be shared with consultants and contractors governed by confidentiality agreements.¹⁸⁰ GRID2.0 argues that such agreements are not novel and are common in the industry to access confidential business or private personal information.¹⁸¹ GRID2.0 agrees with

¹⁷¹ GRID2.0 Reply Comments at 7.

¹⁷² GRID2.0 Reply Comments at 7.

¹⁷³ GRID2.0 Reply Comments at 7.

¹⁷⁴ GRID2.0 Reply Comments at 7.

¹⁷⁵ GRID2.0 Reply Comments at 7.

¹⁷⁶ GRID2.0 Reply Comments at 7.

¹⁷⁷ GRID2.0 Reply Comments at 8.

¹⁷⁸ GRID2.0 Reply Comments at 8.

¹⁷⁹ GRID2.0 Reply Comments at 8.

¹⁸⁰ GRID2.0 Reply Comments at 8.

¹⁸¹ GRID2.0 Reply Comments at 8.

Pepco that the annual updates should be on a regular schedule and be at least 3 months into each year to accommodate Pepco's current internal planning cycles.¹⁸²

51. GRID2.0 notes that Pepco only collects four of the seven items in the distribution overview category;¹⁸³ agreeing with Pepco that currently collected information informing the ACR will be useful, but that the adequacy of the information should be further evaluated in the second cycle of IDSP.¹⁸⁴ GRID2.0 recommends that overlay maps focus on providing data suitable for evaluating feeder-level investments, as it would be relevant for future coordinated efforts with overlays of the gas distribution system.¹⁸⁵ GRID2.0 recommends that IDSP explicitly provide Pepco with the opportunity to formalize its reporting on workforce and material supply challenges.¹⁸⁶ GRID2.0 further recommends that a working group be formed to address environmental justice mapping analysis, as this is a multifaceted issue, while also recommending the utilization of CEMI-3, which Pepco currently collects.¹⁸⁷

52. GRID2.0 recognizes that Pepco is willing to identify the information assembled at the feeder level to provide granular analysis that is helpful for DER and other cost-effective alternatives to be evaluated.¹⁸⁸ GRID2.0 addresses Pepco's objection to the reliability metrics for 5 and 10 years arguing that feeder-level data on existing reliability and projected improvements is valuable for examining where actual reliability improvements are occurring. Therefore, GRID2.0 reasserts that a 5-year projection for O&M is adequate for the purpose of IDSP. GRID2.0 views Pepco's assertion that it is only willing to provide a general summary of vulnerability to the system presented by climate change as insufficient; arguing that system resilience must, at a minimum, provide information on how system investments contribute to a more robust energy system.¹⁸⁹

53. GRID2.0 appreciates that Pepco is willing to look into non-wire solutions, emphasizing that it is important to make non-biased comparisons between conventional investments and NWA's, meaning the use of a robust cost-benefit analysis will be imperative to ensure the best outcomes.¹⁹⁰ GRID2.0's supports reporting for third parties, community outreach, and Pepco's request for a working group to address the issues identified in its reply comments and

¹⁸² GRID2.0 Reply Comments at 8.

¹⁸³ GRID2.0 Reply Comments at 9.

¹⁸⁴ GRID2.0 Reply Comments at 9.

¹⁸⁵ GRID2.0 Reply Comments at 9.

¹⁸⁶ GRID2.0 Reply Comments at 9.

¹⁸⁷ GRID2.0 Reply Comments at 9.

¹⁸⁸ GRID2.0 Reply Comments at 9-10.

¹⁸⁹ GRID2.0 Reply Comments at 10.

¹⁹⁰ GRID2.0 Reply Comments at 11.

the reply comments of other parties.¹⁹¹

54. **Community Comments.** The Commission received comments from individual interested District residents thanking the Commission for beginning a discussion on IDSP, asserting that a strategic plan to meet the District's needs is critical.¹⁹² The Interested Residents request that the Commission undertake a collaborative and transparent process for developing IDSP that aligns with the District's climate commitments and energy planning.¹⁹³ The Interested Residents believe that robust stakeholder involvement is the starting point for planning and that the Commission must enable the data sharing necessary for all stakeholders and experts to participate fully in planning.¹⁹⁴

55. The Interested Residents assert that the Commission should look to other jurisdictions, such as Maryland, that have implemented IDSP;¹⁹⁵ advocating for a working group similar to the one used in Maryland, which included the Maryland Energy Administration.¹⁹⁶ The Interested Residents assert that the DOEE must be a key partner in IDSP; stating that including DOEE is necessary to ensure that the modernized electric grid can accommodate load growth in line with the Districts' electrification plans, as stated in DOEE's Strategic Electrification Roadmap for Building and Transportation.¹⁹⁷ Finally, the Interested Residents encourage the Commission to coordinate IDSP for electricity with gas system planning to avoid the risk of wasteful ancestral spending on infrastructure that is not useful to the district's transition to clean energy sources.¹⁹⁸

56. **Pepco.** Pepco recognizes that OPC, DOEE, and GRID2.0 suggest the inclusion of various categories of data beyond what is proposed in the Strawman Proposal. The Company asserts that this additional information "has to be carefully balance against the Commission's goal of not adding burdensome data requirements."¹⁹⁹ In response to the Parties' request to include additional data within the scope of IDSP, Pepco "suggests a six-month, limited working group" so that the Parties can identify areas of agreement, non-consensus, and where additional clarification is needed and submit a proposal to the Commission.²⁰⁰ Pepco asserts that there "are

¹⁹¹ GRID2.0 Reply Comments at 11.

¹⁹² Interested Resident's Comments at 1.

¹⁹³ Interested Resident's Comments at 2.

¹⁹⁴ Interested Resident's Comments at 3.

¹⁹⁵ Interested Resident's Comments at 3.

¹⁹⁶ Interested Resident's Comments at 3.

¹⁹⁷ Interested Resident's Comments at 4.

¹⁹⁸ Interested Resident's Comments at 5.

¹⁹⁹ Pepco Reply Comments at 2-3.

²⁰⁰ Pepco Reply Comments at 1.

several benefits to this approach,” including that it allows the Company to explain the challenges and constraints associated with providing the requested data and it permits the parties to explain their rationale for requesting the data.²⁰¹ After the submission of the working group report, Pepco recommends that the Commission permit the filing of another set of comments.²⁰²

57. In response to DOEE’s request that clearer guidelines be included in the Strawman Proposal as to how IDSP advances the District’s clean energy policies and goals, Pepco supports including this as an issue to be addressed in the limited working group.²⁰³ Pepco also recognizes that the stakeholders support the inclusion of a BCA analysis in IDSP. However, Pepco argues that a Commission decision on the applicability and use of the BCA model is still pending in General Docket No. 2019-4-M; therefore, including this requirement is premature.²⁰⁴

58. Pepco also recognizes the stakeholders, including OPC and DOEE, offered several engagement recommendations in their initial comments and GRID2.0 argued that Pepco having complete control of the IDSP design presents a challenge for enabling alternatives.²⁰⁵ While reiterating its support for stakeholder engagement, Pepco disagrees that Commission approval is needed prior to IDSP implementation reiterating that “the final resolution of the operation and investments in the distribution system remains with the Company.”²⁰⁶ Pepco argues that it has the burden of demonstrating the prudence of its incurred costs, therefore, “it is imperative that the Company have the ability to have the final say on the investments it makes.”²⁰⁷

59. Pepco notes its alignment with certain stakeholder comments and suggestions related to the: (1) frequency of an IDSP filing (every 3 years), (2) application of the BCA, (3) presentation of capital expenditure data, (4) overlap of data included in the ACR, (5) data security concerns related to CEII, (6) need to coordinate IDSP with other Commission proceedings, and (7) need for Parties to streamline or eliminate redundant reporting requirements.²⁰⁸

60. Finally, Pepco reiterates its position that the Commission should redefine IDSP as an IDP due to the inclusion of elements beyond the distribution system and requests that if the Commission does not convene a limited working group, then it clarify, remove, or alter certain elements of the IDSP as identified in the Company’s Initial Comments.²⁰⁹

²⁰¹ Pepco Reply Comments at 3-4.

²⁰² Pepco Reply Comments at 4.

²⁰³ Pepco Reply Comments at 5.

²⁰⁴ Pepco Reply Comments at 6.

²⁰⁵ Pepco Reply Comments at 7.

²⁰⁶ Pepco Reply Comments at 2.

²⁰⁷ Pepco Reply Comments at 7-8.

²⁰⁸ Pepco Reply Comments at 8.

²⁰⁹ Pepco Reply Comments at 9.

IV. DECISION

61. The Commission appreciates the comments filed by stakeholders and supports the overall desire to move forward in a collaborative and comprehensive manner. While we will refrain from making any determinations on specific requests and recommendations made in stakeholder comments, we are encouraged that there is agreement amongst the stakeholders on several key issues. We also acknowledge the requests of DOEE and Pepco to allow the parties to further align their recommendations through a stakeholder working group process.

62. Given the importance of this proceeding, we find it appropriate to grant stakeholders' request to convene an IDSP WG. While we appreciate DOEE's request that stakeholders meet and confer independently for six (6) months, we believe the collaborative process should be facilitated by a third-party consultant not only to ensure that there is robust stakeholder engagement, but also to ensure the process runs efficiently and meets the goal of timely submitting a framework and recommendations to the Commission. To this end, the Commission will procure a consultant to facilitate the IDSP WG process and provide the requisite technical, regulatory, and analytical expertise in this matter.²¹⁰ The consultant shall administer the IDSP WG process as described below.

63. **Working Group Administration.** The IDSP WG shall:

- (1) Be notified by the Commission Staff of the first working group meeting in this matter within ninety (90) days of the date of this Order.
- (2) Consist of Parties to this proceeding and be led by the Commission selected consultant, with meetings to be held at the Commission or virtually, unless otherwise agreed upon by the participants.²¹¹
- (3) File the meeting Agenda with copies of planned presentations in the *Formal Case No. 1182* docket at least five (5) business days prior to any Working Group Meeting.
- (4) File Meeting Minutes with presentations given during the meeting, if not previously filed, in *Formal Case No. 1182* docket within ten (10) business days of the conclusion of a Working Group Meeting.
- (5) Conclude the working group process and submit the IDSP WG Report, which shall include a proposed IDSP framework, consensus recommendations, non-consensus recommendations, requests for clarification, and a clean and

²¹⁰ See RFP No. PSC-25-12, issued June 6, 2025. Responses to the RFP are due by July 17, 2025.

²¹¹ The Commission directs that the selected consultant shall draft and timely file the Working Group Report and ensure all stakeholder input is properly reflected therein. The consultant shall also draft and file meeting agendas and minutes and ensure that participants file presentations in accordance with the deadlines provided herein. Commission staff may attend IDSP WG meetings as an observer and may answer questions and requests for clarification after consulting the Commission, if needed.

redline copy of the revised Strawman Proposal with edits or amendments within 270 days of the date of the first IDSP WG meeting.

64. While we expect the various issues raised by stakeholders in their comments will be addressed in this process and captured the working group report,²¹² we have further outlined, and appended to this Order, four topic areas that stakeholders shall address in the development of the IDSP WG Report.²¹³

65. Interested persons not party to the IDSP WG may file comments on the IDSP WG Report within thirty (30) days its filing and the Commission shall issue an Order on IDSP within six (6) months of the submission of comments.

THEREFORE, IT IS ORDERED THAT:

66. The Commission **SHALL** notify stakeholders of the first Integrated Distribution System Planning Working Group meeting within ninety (90) days of the date of this Order;

67. The Integrated Distribution System Planning Working Group **SHALL** submit a Working Group Report as directed herein within 270 days of the date of this Order;

68. Interested persons not party to the Integrated Distribution System Planning Working Group **SHALL** submit comments on the Integrated Distribution System Planning Working Group Report within thirty (30) days of its filing; and

69. The Commission **SHALL** issue an order on Integrated Distribution System Planning within six (6) months of the submission of comments.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:



CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

²¹² Issues including, but is not limited to: (1) Pepco's request to rename the IDSP process to IDP; (2) any changes to the Strawman Proposal; (3) clearer guidelines as to how the IDSP process advances the District's clean energy goals; (4) how the IDSP process can best be coordinated and integrated with other, related Commission proceedings, like *Formal Case No. 1167*; (5) the elimination, transfer, or consolidation of Pepco reporting requirements to further IDSP; (6) how stakeholders recommend handling data security related to CEII and PII; and (7) how to best incorporate the BCA in IDSP.

²¹³ See Appendix A – Non-Exhaustive List of IDSP Working Group Topics.

APPENDIX A**Non-Exhaustive List of Integrated Distribution System
Planning (IDSP) Working Group Topics****TOPIC #1: Advance, Modern, and Scenario-based Load Forecasting**

To support a robust and forward-looking planning process, the working group shall explore and incorporate the following elements:

- Integration of advanced forecasting tools, including probabilistic techniques and scenario-based models, to improve accuracy by accounting for varying degrees of electrification, distributed energy resource (DER) adoption, and policy impacts.
- Development of time-varying demand forecasts that reflect the District's evolving energy landscape and load shape changes over time.
- Implementation of forecast error assessments, along with documentation of methodological improvements, to reduce the risk of both overbuilding and under-investment in grid infrastructure.
- Provision of granular forecasts at the substation and feeder levels, with clearly articulated assumptions, to support transparency and analytical rigor.
- Enhanced load forecast considerations:
 - DER Accounting: Which distributed energy resources are included in the forecast?
 - Policy and Incentives: What policies, programs, or incentive scenarios are considered?
 - Sizing and Configuration: What system sizes and configurations are projected as most probable?
 - Adoption Patterns: Who will adopt these technologies, in what locations, and on what timeline?
 - Behavioral Impacts: How will customer behavior, demand patterns, and generation profiles affect grid performance?

TOPIC #2: Supporting Transparent and Data-driven IDSP Process

To ensure the Integrated Distribution System Planning (IDSP) framework is both robust and accessible, the working group shall consider the following:

- IDSP submissions shall include detailed documentation of all data inputs, methodologies, assumptions, and outputs—particularly in the areas of load forecasting and capital planning. Access to baseline data from the utility is essential to enable a clear understanding of the current state of the distribution system and existing planning

practices.

- Aligning planning submissions with consistent data classifications and clearly stated assumptions, especially those concerning load growth, DER adoption, and climate-related impacts, will enhance transparency, enable comparability across filings, and support more effective stakeholder review.
- The working group shall evaluate opportunities to incorporate and align other relevant planning reports, such as the Distribution Construction Program Report (DCPR), Annual Consolidated Report (ACR), etc. into the IDSP process to streamline information and reduce redundancy.
- The working group shall address concerns related to the handling of Critical Infrastructure Information (CII). It should explore and recommend approaches that balance the need for transparency and public access to planning data with the imperative to protect system security and customer privacy.

TOPIC #3: Expanding DER Valuation and Hosting Capacity Transparency

To enhance stakeholder understanding and support effective integration of distributed energy resources (DERs), the working group shall consider the following actions:

- Provide detailed and regularly updated DER hosting capacity maps that include information on interconnection timelines, grid congestion levels, Supervisory Control and Data Acquisition (SCADA) system coverage, and asset health indicators (*e.g.*, transformer age and condition). These maps can serve as critical tools for planning transparency and stakeholder engagement.
- Evaluate DER deployment across a range of penetration scenarios—such as low, medium, and high—and assess the resulting impacts by location, resource type (*e.g.*, solar, storage, electric vehicles), and the value provided to the grid. This analysis will inform optimal DER siting and investment strategies.

TOPIC #4: Addressing Climate Resilience, Electrification, and Equity Within the IDSP Framework

To ensure the IDSP process supports the District's long-term climate, energy, and equity goals, the working group shall address the following:

- Incorporate climate vulnerability assessments and resilience planning measures within IDSP documentation. This includes identifying infrastructure risks due to extreme weather events and long-term climate trends and outlining strategies to enhance grid resilience and reliability.
- Evaluate the grid's preparedness to support widespread electrification across sectors,

including transportation and buildings. Consider managed charging strategies, demand flexibility solutions, and rate structures that can guide proactive infrastructure investments.

- Include both qualitative and quantitative assessments of how environmental justice considerations, community-level impacts, and resource distribution are reflected in planning activities. This ensures planning processes are inclusive and aligned with the District's equity commitments.
- Ensure that the IDSP framework is meaningfully aligned with the District's climate and clean energy goals, including Clean Energy DC and Carbon Free DC, to support coordinated and coherent energy system transformation.

COMMISSION ACTION

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

Date 7/16/25 Formal Case Nos. 1182 Tariff No. _____ Order No. 22464

	Approve Initial & Date	Disapprove Initial & Date	Abstain Initial & Date
Chairman Emile Thompson	<u>ET/JP 7/16/25</u>	_____	_____
Commissioner Richard A. Beverly	<u>RB/JP 7/16/25</u>	_____	_____
Commissioner Ted Trabue	<u>TT/JP 7/16/25</u>	_____	_____

Certification of Action

Jamond D. Perry
General/Deputy General Counsel

Naza Shelley
OGC Counsel/Staff