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September 22, 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. 1176**

Dear Ms. Westbrook-Sedgwick:

Attached please find the Meeting Minutes from the September 11, 2025 Lessons Learned Working Group. Please feel free to contact me if you have any questions. Thank you.

Sincerely,

*/s/ Dennis P. Jamouneau*

Dennis P. Jamouneau

Enclosure

cc: All Parties of Record

**FC 1176 – LESSONS LEARNED WORKING GROUP MEETING – SEPTEMBER 11, 2025**

Commission Staff opened the meeting and stated that Pepco would be responsible for the meeting minutes, and OPC will take meeting minutes at the next meeting. The meeting began with Pepco providing its proposed outline of the working group report, which is due by December 31, 2025. Pepco walked through the draft outline provided to parties on September 5 (by email) with the first several sections dedicated to an outline of the working group, the Commission’s description of the working group’s tasks, and working group meeting summaries. The latter sections of the report will deal in both consensus and non-consensus sections including metrics and establishing a framework for evaluation. Pepco proposed to begin drafting the first sections of the report and agreed to provide that in advance of the next meeting. OPC raised issues in addition to the metrics spreadsheet to include in the report. DCG expressed support for including other topics in the report, such as lessons learned from the reconciliation filings and related issues which have been discussed in previous working group meetings (e.g., the value of consistent ITNs to track project costs over time). Staff stated that parties should feel free to raise issues that they believe should be in the report. Staff and OPC agreed that OPC could present on – or discuss – these issues at the next meeting.

Next, the meeting shifted to a presentation by DOEE. It is attached to this report. DOEE’s presentation begins with an example that shows the need for earlier discussion and agreement on key policy items prior to rate case filings, where possible. DOEE cited as examples improvements to RAD and the AMP, interconnection, and challenges related to whole building aggregate data, a cornerstone of the building energy benchmarking and BEPS programs. DOEE further described the various challenges in the interconnection space and how that continued to be challenging during the rate case and in 2025. Parties then discussed potential structural ways to have meaningful discussions about topics where there is more agreement or requires additional data/information, including pre- or post-filing meetings and informal discussions. DOEE pointed to its presentation, where it had identified these options as ways to facilitate these outcomes in future cases. DOEE also asked that if parties identify anything where their agency’s expertise would be useful, to try to identify that for them in the case. Working group members asked if these

conversations would be facilitated by formal initiatives prompted by the Commission or more informally. DOEE explained that many would likely be informal, but that remains important for advance program development before and during rate cases. Some of these coordination initiatives could perhaps be advanced through formal requirements or guidance. Finally, DOEE discussed ways to make decision-making on issues that require follow-up after rate cases more streamlined, including alternatives to traditional monthly working groups, which can last months or longer.

The second part of the DOEE presentation discussed its review of the Staff Metrics spreadsheet and how DOEE approached it, including its prioritization of the various proposed metrics. DOEE next used the interconnection timeline as an example and suggested ways to disaggregate the data by the various steps in the process, including who (Pepco or the customer/developer) is responsible for which part and how long each takes. DOEE also talked about new service/upgrade timelines, and noted that the DC Council had identified energization timeline tracking as a priority in its recent 2024 EV Readiness statute.. DOEE acknowledges that how the data for this is measured is complex, but does recommend continuing to refine with Pepco on how to measure this important goal.

DOEE next discussed whole building aggregate data, including the BEPS standards and presented a summary of whole building data is aggregated. DOEE stresses the importance of data in this space and ties into statements (including a proposed Ratemaking Adjustment) supported by Pepco in the FC 1176 MYP. DOEE seeks metrics and data tracking that would help understand the accuracy, timeliness, and user experience related to the provision of whole building aggregate data. DOEE recommends continuing to work with Pepco on a small sample as a starting point in developing how to measure this metric in the future. OPC asked how DOEE's recommendation fits into what the PSC approved in this MYP. DOEE explained that providing whole building aggregate data is one of the functions funded by distribution rates approved in the MYP, and in FC1176, requested a ratemaking adjustment to further improve its processes related to providing whole building aggregate data.

Finally, DOEE talked about PIMs, noting the history and that DOEE uses many of the "tracking PIMs" currently reported. DOEE stressed that the process of developing PIMs can be meaningful but that there is "information asymmetry" among parties, particularly noting the

various avenues for sharing information prior to Pepco proposing them in the next rate case. DOEE recommends collaboration with Pepco and ensuring opportunities for information exchange exist, including targeted data requests. Pepco stressed the need to discuss ways to lessen data reporting once new PIMs are agreed upon and approved by the Commission. DOEE also agreed with Pepco that tracking metrics which the parties and Commission are not using could be reviewed to determine whether they remain valuable to track and report.

The meeting shifted back to reporting metrics. Staff asked OPC to discuss its position which it articulated in a September 9 email that, to summarize, explained that OPC thinks that metrics used in evaluation need to be tied to the MYP. OPC also proposed that an additional item for the metrics spreadsheet include disparities in the UROR for different rate classes and how that has changed or been impacted by MRPs. Staff noted that OPC may need to provide more information to show the connection to the MRP and that this could be a topic for the next meeting.

Pepco then presented its spreadsheet showing potential metrics, which included its compilation of metrics by parties to date. Pepco discussed its spreadsheet with the goal of coalescing around a manageable number of metrics with various parties' input in terms of prioritization. Pepco asked that parties only provide edits to their respective sections (Column, in the spreadsheet) of the Excel but that if other changes are made, to point them out in an email. Pepco sent the Excel metrics spreadsheet on 9/11 with responses due from parties on or before 9/18. The next meeting is on October 16 at 10 am.

Formal Case 1176

Multiyear Rate Plans – Lessons Learned Working Group

DOEE Presentation  
September 11, 2025

Peter Damrosch  
Energy Policy Advisor, DOEE

# TOPICS

- I. Lessons learned based on DOEE experiences
  - a. Overview
  - b. Example: RAD & AMP proposals
  - c. Example: Interconnection
  - d. Example: Whole-Building Aggregate Data
  - e. Takeaways & Recommendations
- II. Metrics & Evaluation Framework
  - a. Overview & Principles
  - b. Specific Metrics
- III. PIM Development
  - a. Information Sharing & Recommendations

# **I. LESSONS LEARNED BASED ON DOEE'S EXPERIENCES FROM THE LAST RATE CASE**

# OVERVIEW OF EXPERIENCES IN LAST RATE CASE

- DOEE areas of focus:
  - Policy development, program administration, energy research & data analysis
  - This presentation focuses on those areas and lessons learned from the last rate case
  - Complementary focus to other important topics such as revenue and cost forecasting, which have been the subject of other meetings
- Background: I joined DOEE in February 2024
  - FC1176 MRP already in progress (filed April 2023)
- Initial observations
  - Large number of key questions related to rate case structure (e.g., multiyear rate plans vs. traditional cost of service); subjects of extensive testimony
  - Record and positions appeared less developed for a number of programs, policies, and investments

# EXAMPLE: RAD & AMP CHANGES

- Pepco proposal to enroll customers in RAD directly & automatically enroll customers in AMP
  - Useful information in initial testimony, but some details not fully explained (e.g., uses of funds; process for strengthening rates of AMP completion if residents enrolled automatically)
  - Appeared that these proposals had not been discussed and developed with key partners (e.g., OPC, DOEE)
  - Interrelationships with other programs not fully explored (e.g., referrals). Could also be made redundant by alternative initiatives under consideration (e.g. automatic enrollment for UDP)

Potential Takeaway: Earlier engagement by Pepco (pre-rate case) may help improve likelihood of fully developed and supported proposals

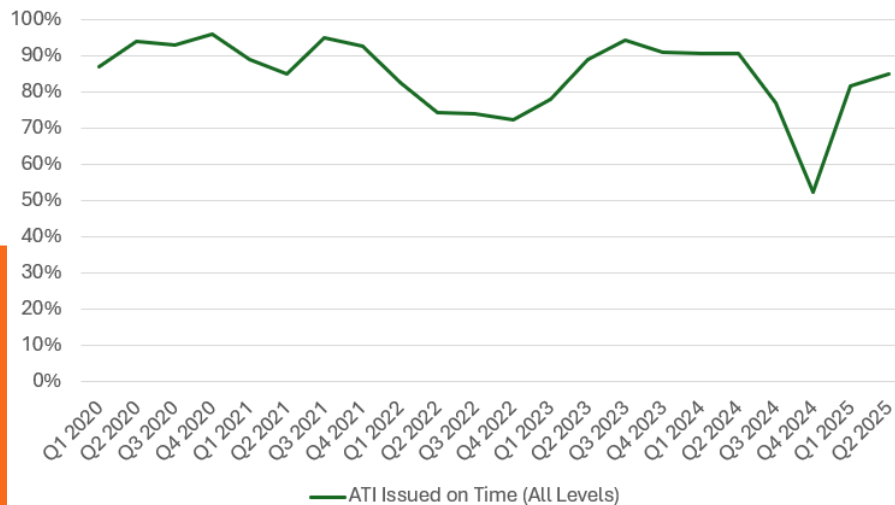
## EXAMPLE: INTERCONNECTION

- Pepco made proposals regarding interconnection in FC1176 (as it had in FC1156)
- Industry and public agencies (OPC, DOEE) filed multiple studies and comments each year in FC1050 and RM40 detailing concerns and recommendations for improvements
- During that period, Pepco began filing annual Corrective Action Plans for 2022, 2023, and 2024 due to challenges meeting regulatory timelines

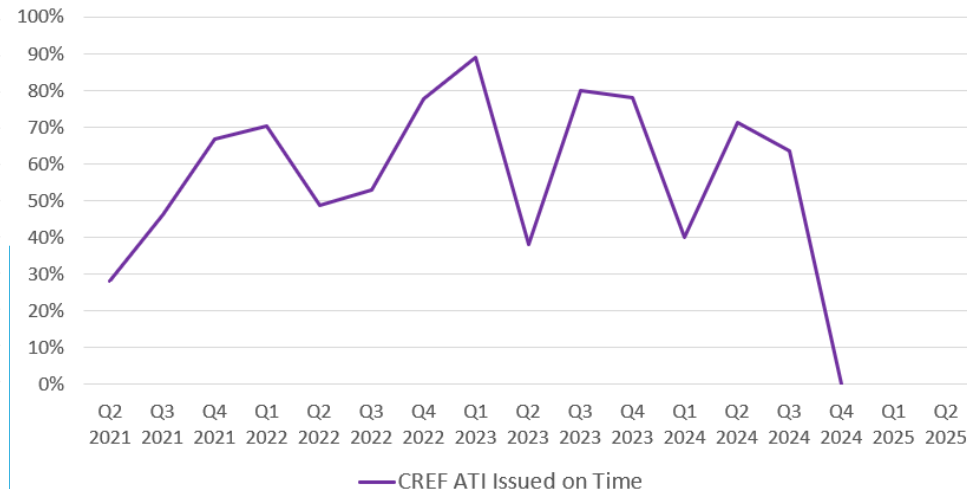
# EXAMPLE: INTERCONNECTION

- Pepco experienced particularly acute challenges in 2024 during the pendency of the rate case
  - High application volumes & staffing challenges (see 2024 Corrective Action Plan)
  - Sharp downturn in percent of ATIs issued on time (metric has been recovering)
  - 0% of CREF ATIs issued on time in Q4 2024; still far below timely approval rates for other systems

Timeliness of Approval to Install (All Projects)



Timeliness of Approval to Install - CREFs

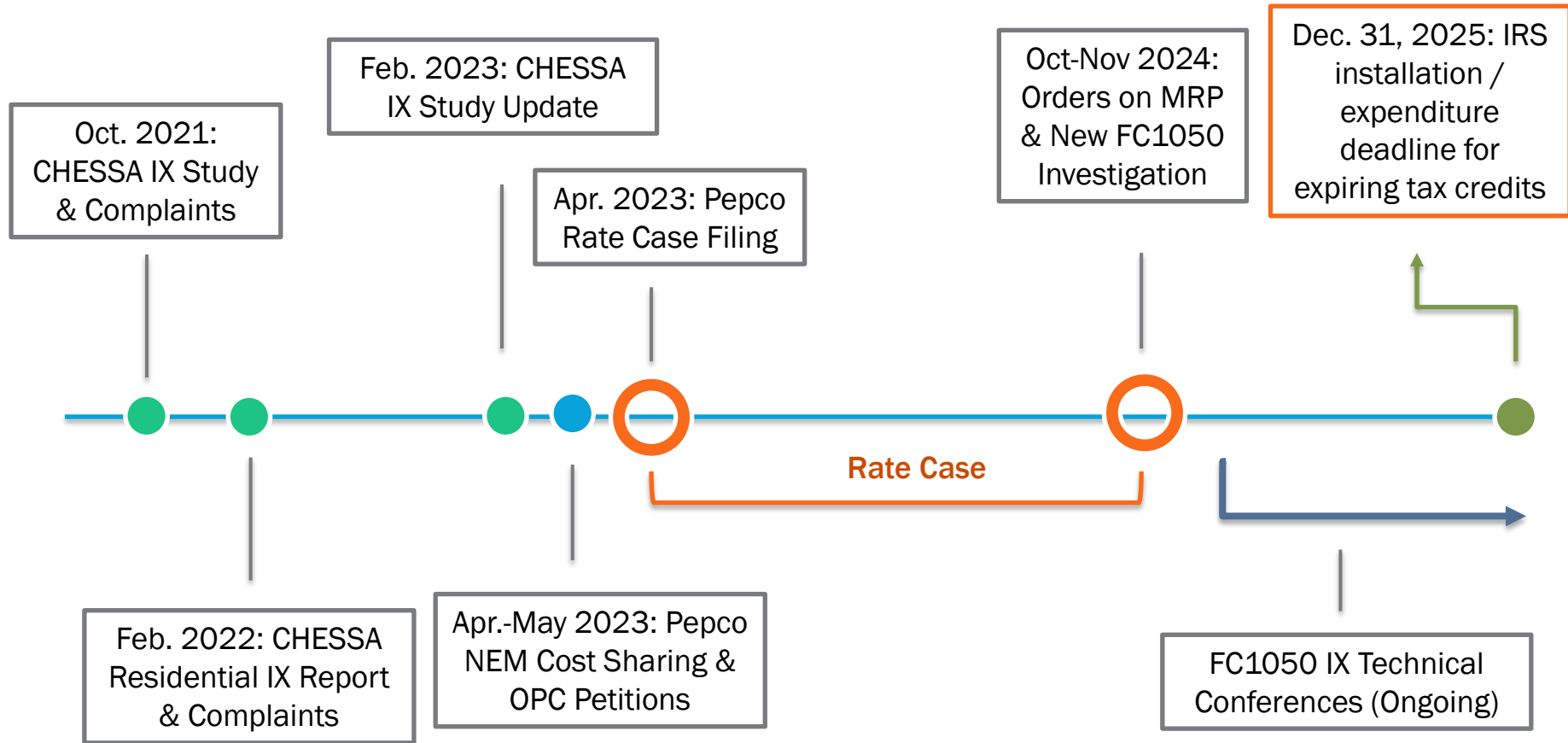


# EXAMPLE: INTERCONNECTION

- In the rate case, DCG supported Pepco's proposals related to interconnection; no party opposed
- Rate case decision (Nov. 2024) did not result in clear steps to improve interconnection
  - PSC denied Pepco's proposed ratemaking adjustment (RMA) to support interconnection
  - PSC initiated separate interconnection investigation; remains ongoing
- Interconnection needs remain high
  - Pepco has been working on improvements (e.g. team re-organization), but also seeing higher application volumes
  - December 31, 2025 – key date for completing installation of projects in time for eligibility for certain expiring federal tax credits

Potential Takeaway: Consider how to develop understandings of issues, solutions, and any information needs more fully before and during rate cases to support improvements in key program areas

# EXAMPLE: INTERCONNECTION



## Annual IX Corrective Action Plans Filed:

- March 29, 2023 (for CY 2022)
- March 29, 2024 (for CY 2023)
- March 31, 2025 (for CY 2024)

# EXAMPLE: WHOLE-BUILDING AGGREGATE DATA

- In FC1176, Pepco made proposals related to improving its systems around providing whole-building aggregate data to support BEPS and building energy benchmarking
- No additional testimony or record development in FC1176 after Pepco's proposal
- Commission denied ratemaking adjustment
- **DOEE Lesson Learned:** Understand need for and opportunities to provide comments on items that may get less attention in rate cases, particularly as they relate to program administration
- See proposed metric below for more information

## OTHER EXAMPLES

- Service upgrade timelines/costs
- Proposed time of use rates
- Access to Green Button data
- Review and improvements to non-wires alternative screening & selection process

# TAKEAWAYS & RECOMMENDATIONS

- (1) Earlier engagement with issues before rate cases
  - Pepco & Stakeholders: Identify priorities, discuss and develop proposals or options prior to rate case filing
  - PSC: Pursue information gathering on known, key areas in advance of rate cases (e.g. interconnection)

# TAKEAWAYS & RECOMMENDATIONS

- (2) Strengthen engagement and discussion during rate cases
- Pepco & Stakeholders: Identify opportunities for discussion and advancement of ideas between rounds of testimony (meet, don't just write)
  - PSC: Identify areas where additional information might be helpful during a rate case (e.g., whole-building data)
    - DOEE appreciates when other agencies and parties highlight areas where additional input from DOEE could be helpful

# TAKEAWAYS & RECOMMENDATIONS

(3) Think thoughtfully about process and next steps for any follow-up after rate cases

- Establish clear timelines for both proposals and PSC decisions
- Consider alternatives to traditional monthly working groups (e.g., additional 1 or 2 rounds of written comments; dedicated 6-to-8 week development)
- Can be reasonable to specify other dockets where programs should be developed, but need established timelines for next steps and decisions in those dockets

## II. METRICS

# METRICS & EVALUATION FRAMEWORK: OVERVIEW

- DCG circulated revised version of Lessons Learned Evaluation Framework (Sept. 4, 2025)
  - Includes suggested categorizations based on high, medium, and low priorities, and identifies overlapping or potentially redundant topics
- Tracking & Benchmarking
  - DCG responses to staff questions (emailed Sept. 4, 2025) noted that benchmarking can be valuable, both relative to past Pepco performance and across other utilities
  - Should also track metrics even where no benchmarking or PIM currently exists/planned (can help measure key areas going forward; identify areas where additional benchmarking or PIM development would be valuable)

Following slides provide additional information on several metrics based on questions received

# METRICS: INTERCONNECTION

- Agree with Pepco’s general suggestion to track number of business days for interconnection, but should disaggregate by:
  - (1) Project size
  - (2) NEM vs. CREF systems
  - (3) Steps within the interconnection process
- Similar to existing reporting in Annual Interconnection Report, but disaggregated by project size and NEM vs. CREF
  - Significantly more valuable for understanding overall outcomes, utility performance, potential PIM design

Distribution of the Average Number of Business Days from First Submission of an Incomplete Application to Final Approval of Interconnection Applications							
Process step	Acknowledgment of Incomplete Application	Resubmission	Acknowledgment of Complete Application	Approval to Install	Submission of Part 2	Authorization to Operate	Total Processing Time from First Submission
Responsibility	Company	Customer	Company	Company	Customer	Company	Company & customer
Avg. Processing time	3.07	5.88	3.8	6.7	52	11.96	85.96

# METRICS: INTERCONNECTION

- Important for understanding key rate case outcomes
  - Connection to DC policy goals, customer service, energy affordability
  - Repeated focus in both MRP applications and in Commission approval of the first MRP
  - Order 20755, p.4 (June 8, 2021): “[T]he modified EMRP will allow Pepco to redeploy resources from rate case litigation . . . And focus additional attention on: (1) continued enhancements to the interconnection process for renewable energy facilities [and] project interconnection improvements.”

# METRICS: TIMELINES & COSTS FOR NEW SERVICE CONNECTIONS & SERVICE UPGRADES (LOAD)

- Essential area to understand for customer service, costs, and electrification
- Identified by the DC Council as a priority ([EV Readiness Act of 2024](#))
  - EV Infrastructure Report (DOEE): “Must include “8) A description of the current process and **average timelines for electrical companies to fulfill service requests for energization of electric vehicle charging infrastructure, including new service connections and service upgrades;**”
  - DDOT Pilot Program: Must assess “Whether delays in the timely fulfillment of requests for energization by electrical companies, including new service connections and service upgrades, have affected the effectiveness of the Pilot Program.”
- Example energization timeline tracking in CA, NY, CO

# METRICS: NEW SERVICE & SERVICE UPGRADES (LOAD)

- Metric Design Consideration #1: What timelines are being tracked?
  - Valuable to understand the entire timeline: initial request for service / service upgrade → final energization
    - May be easiest to measure (initial & final dates only); arguably most important metric from a customer & District-wide perspective (whole experience timelines); requires context & explanation (e.g. explanation that this metric includes steps involving various actors including customer, Pepco, and permitting agency actions)
  - Alternatives include tracking by step in process, but that requires defining steps and may require additional effort if tracking is not automated

# METRICS: NEW SERVICE & SERVICE UPGRADES (LOAD)

- Metric Design Consideration #2: How should data be disaggregated?
  - E.g., EVSE vs. buildings; Level 2 chargers vs. DCFC chargers; new construction vs. service expansion; residential vs. commercial
- Metric Design Consideration #3: What is the process and level of effort on Pepco's side for tracking?
  - May want to start simpler (e.g., total timelines), and progress as appropriate in the future to more granular reporting (e.g., by step)
- **DOEE Recommendation:**
  - DOEE and Pepco continue to discuss possibilities and present a recommendation or options later this fall

# METRICS: WHOLE-BUILDING AGGREGATE DATA

- Whole-building aggregate data is the process by which utilities sum all meters at a given building for each month to get the energy consumption for the entire building
- Essential for DC's Benchmarking & Building Energy Performance Standards (BEPS) programs
  - Helps solve the problem that energy benchmarking & BEPS operate at the building level, while a single building can have many meters, tenants, and utility customers
  - From EPA ENERGY STAR® “The provision of [whole-building aggregate] consumption data allows utilities to provide property owners with the data required to benchmark their properties, while maintaining tenant/resident-level data privacy.”



Driving Building Efficiency  
with Aggregated Customer Data  
A Brief Review of Selected Practices in the U.S.



July 2013

Pepco has been supporting whole-building aggregate data since 2013

- For more information, see Regulatory Assistance Project, Driving Building Efficiency with Aggregated Customer Data (July 2013) ([link](#))

# BACKGROUND: BENCHMARKING & BEPS

- **Benchmarking**
  - Annual requirement for private buildings 25,000+ sqft. and public buildings 10,000+ sqft. Report annual energy and water data to DOEE on May 1st of every year
- **Building Energy Performance Standards (BEPS)**
  - Requirement for private buildings 50,000+ sqft. and public buildings 10,000+ sqft. to improve energy consumption over a 6-year compliance cycle
  - Standards are set at the median level of energy performance by property type. Buildings that don't meet standard must meet energy performance requirements of a compliance pathway by December 31, 2026 (e.g. reduce energy consumption by 20%)
  - Most compliance pathways rely on benchmarking data to demonstrate energy performance requirements are met

# IMPORTANCE OF MEASURING UTILITY PERFORMANCE AROUND WHOLE-BUILDING AGGREGATE DATA

- In general, providing access to energy data is one of the key services modern utilities provide
- Whole-building aggregate data is a cornerstone of DC's benchmarking and BEPS programs
  - Alternative forms of regulation – like MRPs – are meant to support conservation and District policy
- Highlighted by Pepco in its April 2023 MRP application
  - Requested a Ratemaking Adjustment to support improvements to its whole building aggregate data process (e.g. reducing manual steps). Explained that if RMA were denied, Pepco would do its best but may have additional errors and delays in providing data



## **NARUC GRID DATA SHARING PLAYBOOK**

Fall 2023

# HOW THE CURRENT PROCESS WORKS

- On September 1, 2023, Pepco migrated from Resource Advisor (older system) to its new Energy Usage Data System (EUDS) for whole-building aggregate data
- Building owners must submit one meter into EUDS. Pepco then approves the request and begins transmitting whole-building aggregate data into EUDS
  - This involves several steps on Pepco's end. For example, Pepco must maintain accurate lists of the meters associated with a building (which can change over time). Pepco then extracts the data from its billing system for those meters and transmits it to its Load Processing and Settlement (LPS) database. LPS data is aggregated to the building level and then transmitted to EUDS.
- Building owners can then set up a connection with ENERGY STAR Portfolio Manager® (ESPM)
  - ESPM is the platform building owners must use to report benchmarking data to DOEE

# EXPERIENCE WITH WHOLE-BUILDING AGGREGATE DATA

- Pre-2024 (older system: Resource Advisor)
  - Significant issues with accuracy of whole-building aggregate data
  - Significant delays in approving new building requests and providing whole-building aggregate data
  - Process for translating data from raw customer data to Resource Advisor was convoluted and unclear
- Post-2024 (new Pepco system: EUDS – Energy Usage Data System)
  - Several indicators of significant improvements with the new (post-2024) EUDS system
  - But lingering issues remain:
    - E.g.: Properties with multiple buildings (and multiple addresses) have to provide a meter number for each building.
  - And difficult for building owners or DOEE to verify accuracy of data provided by Pepco

# PROPOSED METRICS & PROCESS

- Three key areas to measure: (1) accuracy of whole-building aggregate data, (2) timeliness of providing & updating aggregate data, (3) user experience & usability
- Metric #1: Percentage of whole-building aggregate data verified as accurate (based on sample) (**high priority**)
  - Evaluate 3-5% of buildings that receive whole-building aggregate data to confirm completeness & accuracy.
  - DOEE and Pepco partner to complete the evaluation. DOEE would determine selection of buildings based on a combination of random selection and specific buildings identified by DOEE. DOEE would then conduct evaluation and verification per building, based on data provided by Pepco and information DOEE receives from benchmarking/BEPS reporters.
  - Example data DOEE would request for selected buildings: number of meters being aggregated; address of meters being aggregated; underlying monthly consumption and billing data for each meter; final aggregated data (EUDS)

# PROPOSED METRICS & PROCESS

- Metric #2: Timeliness of providing whole building aggregate data (**high priority**)
  - Metric 2.A: Average number of days from initial request for whole-building aggregate data to data transmission into EUDS (initial request)
  - Metric 2.B: Average number of days between updates to monthly whole-building aggregate data, per building (monthly updates)
- Qualitative Metrics (**medium priority**)
  - Survey of building owners regarding usability of data provided by Pepco and any recommendations for any improvements to the current system

# ADDITIONAL SUPPORTING INFORMATION

- Necessary additional information & data
  - Copy of up-to-date Standard Operating Procedures for computing and transmitting whole-building aggregate data (**high priority**)
- Additional supporting statistics for program
  - Number of buildings receiving whole-building aggregate data (**medium priority**)
  - Number of building requests to receive whole-building aggregate data approved (**medium priority**)
  - Number of building requests to receive whole-building aggregate data denied (**medium priority**)
  - Top three most common reasons for denial of requests (**medium priority**)

# III. PIM DEVELOPMENT

# BACKGROUND ON PIMS

- Order No. 22328 (Nov. 2024) directs Pepco to “include PIMs with financial incentives in the Company’s next MRP filing” (para. 575).
- History of past filings and working groups around PIMs
  - Three versions of the PIMs working group and a series of reports (2021-2023)
  - Resulted in current Performance Tracking Mechanisms – helpful information that DOEE utilizes (e.g., on DER deployment)
  - Less clear what next steps would be valuable at this point to further develop PIMs beyond Order No. 22328’s instruction for Pepco to “include PIMs with financial incentives” in its next rate case filing

# PIM DEVELOPMENT

- The process of developing PIMs can provide meaningful insight into utility performance
- PIM development is greatly improved by processes for information sharing

“PIMs can **reduce information asymmetry** between utilities and other stakeholders by making data on utility programs or services transparent.”

-RMI, PIMs for Progress, p. 8

“**Information asymmetries and lack of data sharing between regulators, customers, and other stakeholders can prevent the thoughtful creation of new utility incentives . . .** Clear data sharing processes can support a shared understanding of the technical potential for utility performance across stakeholders.”

-RMI, PIMs for Progress, p. 29-30

# INFORMATION SHARING FOR PIM DEVELOPMENT

- Information sharing does not necessarily require establishing multiyear performance tracking mechanisms
- Data requests can be an effective, and in many instances more helpful, tool for PIM development
  - See for example presentation by Grace Relf to the FC1050 Interconnection Technical Conference (August 7, 2025), describing the HI PUC's development of a PIM supported by data requests to the utilities
  - Data requests can allow for more tailored information gathering than may be possible with fixed PTMs; can also cover information beyond what PTMs cover (e.g. utility costs/benefits that help with sizing incentive levels)
- Important to think through avenues for information sharing now in advance of next rate case

# RECOMMENDATIONS

- The Commission has directed Pepco to propose PIMs with financial incentives
  - The Commission is more likely to receive valuable proposals from Pepco and others if interested parties are able to work on proposed PIM designs in advance of the next rate case (subject to interest/bandwidth)
- Recommendations:
  1. Pepco should collaborate with interested stakeholders to identify PIM topics of interest and potential design options (e.g., for interconnection approval timelines – broad interest in the FC1050 technical conferences)
  2. The Commission should ensure opportunities for information exchange and discovery exist to assist with PIM development prior to the next rate case

**THANK YOU**

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's September 11, 2025 Lessons Learned Working Group Meeting Minutes has been served via email on this September 22, 2025 on:

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