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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 Nos. 1149 and 1176

Dear Ms. Westbrook-Sedgwick:

Attached please find Potomac Electric Power Company's Reply Comments. 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

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

IN THE MATTERS OF

The Investigation Into the Structure and)
Application of an Experimental Rate Class)
for Both Senior Citizens and Disabled) **Formal Case No. 1149**
Residents in the District of Columbia,)

and

The Application of the Potomac Electric)
Power Company for Authority to Implement) **Formal Case No. 1176**
a Multi-Year Rate Plan for Electric)
Distribution Service in the District of Columbia.)

**POTOMAC ELECTRIC POWER COMPANY’S
REPLY COMMENTS**

On August 1, 2025, Potomac Electric Power Company (Pepco or the Company) filed a letter with the Public Service Commission of the District of Columbia (Commission) notifying the Commission and stakeholders of the upcoming expiration of the funds used for the Experimental Senior Citizen and Disabled Resident Rate Credit Rider (Rider SCADRRC) tariff. As Pepco stated in the August 1 letter, by the terms of the approved tariff, Pepco is required to update the Commission within sixty (60) days of when it estimates the funds associated with the credit will be fully exhausted. Pepco further stated that, based on the monthly amount credited through the program to date, sufficient funding remains to continue the program through September 30, 2025. Finally, while Pepco did explain that it was the Company’s intent, effective October 1, 2025, to discontinue Rider SCADRRC, Pepco was open to finding other ways to fund the credit.

On August 14, 2025, the Commission issued Order No. 22704 (Order). The Order, while also explaining the history of the credit and Pepco's August 1 filing, sought stakeholder input and provided for comments and reply comments on this subject. Between September 3 and September 12, 2025, the District of Columbia Government (DCG), the Office of People's Counsel for the District of Columbia (OPC), the National Consumer Law Center (NCLC), and the Apartment and Office Building Association of Metropolitan Washington (AOBA) filed comments. Below are Pepco's reply comments.

I. REPLY COMMENTS

After review of the comments, Pepco generally agrees with the initial comments submitted by OPC, which are supported by NCLC. In sum, OPC (1) states that Rider SCADRRC should continue to be funded for one year until the Commission makes a final determination regarding the program and allow Pepco to establish a regulatory asset;¹ (2) recommends the Commission convene a technical conference to evaluate Rider SCADRRC and make a recommendation to the Commission;² or, (3) even if the Commission does not extend the program, still convene a technical conference to discuss this and related issues.³

Pepco agrees that extension of this program for a one-year basis, assuming the Commission permits Pepco to establish a regulatory asset for program costs,⁴ is in the public interest. Given economic conditions and rising costs, and because customers that receive this credit cannot be credited under the Residential Aid Discount (RAD) program, the SCADRRC provides a valuable

¹ OPC Comments at 9.

² *Id.* at 7-8.

³ *Id.* at 10.

⁴ Pepco is also open to other funding mechanisms that may be proposed by parties.

resource to defray utility expenses. Furthermore, Pepco agrees with OPC that a technical conference is appropriate to discuss other funding options and other questions – whether answered by Pepco or the appropriate District agency – that stakeholders and the Commission may have.

In response to the DCG comments, which list five questions and submit that further information is required to make an informed decision, Pepco submits the following (including DCG’s questions in **bold**):

1. What households have benefitted from the program to date?

a. What is the number and percentage of households receiving the credit who have qualified under different pathways (e.g. identifying as either a senior citizen or a disabled resident)?

Pepco Response:

The data and information that Pepco receives from the District does not provide this level of detail, though the appropriate District of Columbia government agency may have this level of detail.

b. What is the geographic distribution of households enrolled in the program (e.g. by zip code and ward)?

Pepco Response:

Zip Code and Ward data may be available but not in the timeframe of these reply comments.

c. Given that enrollment is tied to both income and property ownership, is it possible to understand the breakdown of both income levels and assessed property values associated with enrollees when it comes to customers receiving the SCADRRC?

Pepco Response:

See response to Question 1(a).

2. How has enrollment changed over time in the years since the SCADRRC was first created? Have enrollment levels increased, decreased, or stayed constant year over-year?

Pepco Response:

Enrollment by year is approximately 15,000 customers. Enrollments have ranged from 15,012 in 2022 to 15,717 currently.

3. **What have been the impacts of credit when it comes to reducing energy burden?**
 - a. **Is the current \$7.50 credit sufficient to provide meaningful support for residents in need?**

Pepco Response:

This issue is more appropriate for further discussion, such as in the proposed technical conference.

- b. **Are there any other ways to measure the impacts of the program (e.g. in terms of impact on arrears or likelihood of receiving a disconnection notice)?**

Pepco Response:

See response to Question 3(a).

4. **What would be the fiscal or ratepayer impacts of extending the SCADRRC? Are there sources of funding, besides electric ratepayers, that could support the program or provide other forms of support for residents currently receiving the SCADRRC?**

Pepco Response:

As shown in the July 31, 2025 Utility Discount Education Working Group Report filed in Formal Case No. 1176, credits issued each year total approximately \$1.4 million.

Pepco is open to utilizing publicly available grant funding in lieu of recovery from distribution customers, but has not identified any eligible grant opportunities at this time.

5. **Are there alternative uses of those same funds that may do more to address energy burden for residents in need?**

See response to Question 4.

II. CONCLUSION

Pepco respectfully requests that the Commission consider these reply comments and looks forward to continued engagement on this important topic.

Respectfully submitted,

POTOMAC ELECTRIC POWER COMPANY

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Counsel for Potomac Electric Power Company

September 22, 2025

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Reply Comments has been served via email on this September 22, 2025 on:

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