

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL

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Public Advocacy Division
Housing and Environmental Justice Section

ELECTRONIC FILING

September 24, 2025

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

Re: Formal Case No. 1171 – In the Matter of the Investigation into Community Renewable Energy Facility Practices in the District.

Dear Ms. Westbrook-Sedgwick:

On behalf of the District of Columbia Government (DCG), please find the enclosed response from the Department of Energy and Environment (DOEE) to Commissioner Beverley's Inquiry dated July 31, 2025, in the above-captioned proceeding. DCG adopts DOEE's response as its position regarding an acceptable resolution to this proceeding.¹

To briefly recap, Commissioner Beverley, using his independent authority under D.C. Code § 34-802, sought DOEE's input in developing an "error rate" to be applied to the bills of Community Renewable Energy Facility (CREF) subscribers given that the Potomac Electric Power Company (Pepco) failed to timely provide required billing data. Pepco's failure to provide billing data prevented the auditor from performing one of the core purposes of the audit -- to ensure CREF subscribers received all the credits they were due under the CREF program. Commissioner Beverley further inquired whether any error rate DOEE developed could be applied to all CREFs, or just SFA CREFs. Commissioner Beverley's Inquiry sought similar information in relation to unsubscribed energy payments to DOEE and all CREF developers.

DOEE retained a contractor to specifically undertake this task. DOEE's contractor developed several options for an error rate as set forth in the attached response. These options were based on an audit sample of eleven SFA CREFs using data that Pepco only made available to comply with Order No. 22415 (*rel.* May 7, 2025) post-audit. The

¹ DCG has not consulted with Joint Petitioner the Office of People's Counsel (OPC) regarding the recommendations in this response. OPC should be afforded an opportunity to set forth its views on an acceptable resolution to the extent those views differ from DCG's.

methodologies and assumptions used to create these error rates are also described in the attached response (see attachment A to DOEE's Response).

To summarize the conclusions in DOEE's response, DCG recommends that the Commission adopt an error rate of \$5.70 per month, per SFA subscriber, for each month that the subscriber participated in the SFA program during the audit period (ATO through August 2023). As described in more detail in DOEE's response, this error rate represents the average amount of under-credits that SFA CREF subscribers in the CREF audit sample (eleven SFA CREFs) received in any month where an under-credit on one or more of the sample CREFs occurred.

For a subscriber enrolled in SFA for the entire audit period, adopting DCG's proposed error rate would result in a lump sum credit of roughly \$245 that could be applied towards that subscriber's electricity bill each month until exhausted. DOEE estimates that the total amount of credits flowing to SFA CREF subscribers using this error rate would equate to roughly \$1 million. If the methodology behind this error rate were extended to non-SFA CREF subscribers (i.e. the entire CREF market), the resulting total credits would amount to roughly \$1.8 million.

In addition, DOEE's response contains several other recommendations to resolve this proceeding, which are likewise adopted by DCG. Notably, DOEE was unable to calculate an error rate for unsubscribed energy payments. More information, as set forth in the response, would be needed to do that – for both SFA CREFs and the CREF market as a whole. Another recommendation is to adjust the credit amounts to account for Pepco's subsequent rate increases. In other words, because the error rate is based on rates that were in effect at the time, any reimbursement through a rate credit should amount to an equivalent bill offset in terms of kWhs, which have increased in the interim as a result Pepco being awarded another MRP. DOEE also requests that it be reimbursed for expenses entailed in developing its error rate proposal. Significant time and resources went into this endeavor. Lastly, DOEE believes the CREF program in general, and SFA in particular, would benefit from periodic audits of the accuracy of Pepco's crediting and billing practices, which were the root cause of the mismatch. It should go without mentioning that none of Pepco's costs to carry out these recommendations should be passed on to ratepayers.

When considering these recommendations, it is important to remember why these errors rates were developed. They were developed as a direct consequence of Pepco's failure to provide required data despite repeated requests and only after being specifically compelled to do so by the Commission. The result of Pepco's intentional failure was an auditing process that took far longer than necessary and ultimately undermined the very purpose of the audit. It therefore cannot be emphasized enough that DCG is recommending this error rate (and other listed items) in lieu of moving the Commission for penalties that would otherwise be warranted.

Moreover, as DCG and OPC alleged in their Joint Petition, any pattern of under-crediting to subscribers results in reputational harm to the CREF program and SFA in particular. DCG believes Pepco should be held responsible for this ongoing conduct. DCG proposes the attached recommendations in full resolution of ongoing law violations that the Commission determined Pepco committed in Order No. 21600 (almost 2 ½ years ago). For these reasons, DCG believes that the foregoing error rate represents the fairest and most appropriate resolution to this protracted proceeding.

If you have any questions regarding this filing, please do not hesitate to contact the undersigned.

Respectfully submitted,

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Dear Commissioner Beverly:

This filing is in response to your inquiry regarding the additional data the Potomac Electric Power Company (Pepco) filed in e-Bridge pursuant to Order No. 22415. You inquired whether the additional data would allow the Department of Energy and Environment (DOEE) to determine an error rate for Community Net-Metering (CNM) credits and unsubscribed energy payments for both the Solar for All (SFA) program and the Community Renewable Energy Facility (CREF) market as a whole, and if additional data is required.

As noted in the inquiry, Order No. 21600 directed Pepco to conduct a reconciliation of CREF “crediting” so that an audit of Pepco’s billings could be performed by an independent auditor. Unfortunately, the audit performed focused only on CREF production and did not address issues related to whether Pepco properly credited CREF subscribers on their electricity bills for that production. Order No. 22415 determined that Pepco had yet to comply with the directives in the reconciliation and directed Pepco to provide additional. The notable addition to e-Bridge following this order was subscriber crediting data, which was intended to be reconciled as part of the original audit. This data is an important part of an error rate calculation, as it allows actual bill credits to be compared with the credits subscribers were owed based on production.

However, this comparison of credits owed to credits billed can only be done for the CREFs included in the audit sample, because of the comprehensive data provided for them. The 1% materiality threshold that determined which CREFs were chosen for the audit sample was based on meter generation variance, not CNM crediting variances. Thirty-eight (38) CREFs met this materiality threshold, eleven (11) of which are SFA CREF aggregations. DOEE analysis focused only on the SFA CREFs in the audit sample, given the ability to cross-reference with internal records. Based on a comparison of crediting data for these 11 CREFs, if the materiality threshold had been for CNM crediting variance, then the audit sample likely would have captured a larger portion of the CREF population. For this reason, the chosen audit sample may not be representative and may not produce the most accurate CNM credit error rate. However, to acknowledge the time and resources dedicated to this reconciliation process and to provide a path forward, DOEE has developed several error rate scenarios using the data currently available for the Commission’s consideration.

Below, please find a summary of DOEE’s e-Bridge data analysis findings followed by in-depth answers to the inquiry questions. The following sections describe the methodology for arriving at the error rates and DOEE’s recommendation for an acceptable end to the reconciliation process.

Summary of Findings:

- There was significant variation of CNM crediting errors among the SFA CREFs in the sample, with six being on-net overpaid, and five being on-net underpaid.

- Each CREF experienced months of over and underpayment, with on-net underpaid CREFs experiencing larger and more frequent months of underpayment.
- When isolating just the five on-net underpaid SFA CREFs, the average error is an underpayment of \$1.42 per subscriber per month.
- When isolating just the months of underpayment for the five on-net underpaid SFA CREFs, the average monthly error is \$6.00 per subscriber.
- When isolating the months of underpayment for all eleven SFA CREFs in the audit sample, the error rate for this scenario is an average underpayment of \$5.70 per subscriber per month.
- Underpayments to subscribers increase towards the end of the audit period across all SFA CREFs.
- During the audit process, Pepco asserted that it is unnecessary to audit credits and bills because its billing functions are reliable once the source of generation is established. Therefore, Pepco produced an audit only of production variances across the Pepco and CREF meters, rather than auditing credits themselves. DOEE's present analysis of the credit data produced by Pepco shows that significant discrepancies exist between production and actual crediting, contrary to Pepco's assertions during the audit process

Responses to Commissioner Beverly's Specific Questions:

1. Does the data now available on e-Bridge allow DOEE to determine an error rate for CNM credits for Solar for All CREFs?

a. If not, what additional data is required?

Comprehensive production and subscriber data is provided in e-Bridge for a sample of CREFs from the date of Authority to Operate (ATO) to August 2023. The audit sample includes 38 CREFs that met the 1% materiality threshold, eleven of which are SFA CREF aggregations. An error rate for CNM credits can be calculated based on the SFA CREFs that were included in the audit sample. However, given the variation of errors between CREFs and over time, an error rate based on the entire population of SFA CREFs would be more accurate. Using the limited available data, however, DOEE has determined several scenarios to calculate an error rate in a \$ per CREF subscriber format, ranging from an underpayment of \$1.42 to \$6.00 per subscriber per month.

2. *Does the data now available on e-Bridge allow DOEE to determine an error rate for unsubscribed energy payments for Solar for All CREFs?*

a. *If not, what additional data is required?*

No, DOEE can only confirm whether or not the posted amount was received as a payment for SFA CREFs. An error rate for unsubscribed energy payments for SFA CREFs requires the formula and inputs Pepco uses to calculate the value of the unsubscribed energy, specifically, the hourly PJM LMP and adjustments for ancillary service charges. DOEE does not have this information, and it was informally requested from Pepco by email.

3. *Is DOEE able to develop a CNM credit error rate recommendation as either a \$ per MW of installed CREF capacity or \$ per CREF subscriber for the entire CREF market based on information available from the Solar for All projects?*

a. *If yes, how long would it take to compile such a recommendation?*

The error rate DOEE has developed is based on the eleven SFA CREFs included in the audit sample and may or may not be representative of the CREF market as a whole. Given the data available in e-Bridge, a similar error rate could be developed for the non-SFA CREFs in the sample but due to the volume of data this would take roughly 1-2 more months. That said, the error rate for the SFA CREFs could be used as a proxy error rate for the CREF market as a whole, if there are not known reasons to believe that the errors associated with SFA crediting differ from non-SFA CREFs. Given the frequent discussions that DOEE had with Pepco over SFA CREF implementation and administration issues, it might be reasonable to assume that SFA CREFs contain less crediting errors than non-SFA CREFs

4. *Is DOEE able to develop an unsubscribed energy error rate recommendation as a \$ per MW of installed CREF capacity or \$ per CREF for the entire CREF market based on the information available from the Solar for All projects?*

a. *If yes, how long would it take to compile such a recommendation?*

No, DOEE can only identify errors between posted payments and received amounts from Pepco for SFA CREFs. Whether or not other CREF owners have received the correct amount is unknown. Whether the payments are correct or erroneous is indistinguishable without data related to how the payment is calculated. DOEE would need to identify whether the unsubscribed energy is correctly reflected and then calculate the expected payment amount to compare against Pepco's calculation. Due to the lack of alignment between Pepco's customer bills and CREF statements, DOEE would need to determine an acceptable variance between the subscribed and unsubscribed amount for each CREF.

Conclusion

The CNM credit error rate and unsubscribed energy payment are two key remaining issues to resolve the current case, but others exist as well. Of course, one possibility would be for the Commission to order a new audit based on a full set of crediting data that Pepco should have provided to the auditor at the outset. However, DOEE assumes that the purpose of this Inquiry is to find a reasonable method for bringing the audit phase of this proceeding to a timely conclusion. In the interest of moving this process to a conclusion, DOEE proposes that the Commission conclude the audit process with a remedy that includes the following elements:

1. Dollar amount of underpayments: The dollar value of underpayments to CREF subscribers is a crucial element and one of the driving reasons for why the petition was filed in the first place. The total dollar value owed by Pepco for its underpayments would first be calculated by multiplying the error rate by the number of months that each CREF was online during the audit period. This amount would be a lump sum credit applied to affected subscriber's Pepco bills.
 - a. Error rate for subscriber credit: DOEE has provided three scenarios in Attachment A to calculate the CNM credit error rate for the Commission's consideration, and methods to extrapolate it to the entire CREF market. DOEE recommends the second scenario as the most reasonable and appropriate method for calculating the average underpayment to subscribers. In this scenario, the error rate is calculated by taking the average monthly underpayment per subscriber for all months of underpayment and for all SFA CREFs from the audit sample – regardless of whether a particular CREF were net overpaid or net underpaid. This results in an average underpayment of \$5.70 per subscriber per month, which would be multiplied by the number of months the subscriber was to receive CNM credits during the audit period. For a subscriber enrolled for the entire audit period, this would be a lump sum credit of roughly \$245.
2. Unsubscribed energy payments: After additional data is shared regarding how to calculate the value of unsubscribed energy payments, an error rate could be developed to determine whether payments are owed. However, this calculation would be difficult given the lack of transparency in past payments, and a request for more transparency in unsubscribed energy payments is expanded upon in the following section.
3. DOEE staff hours: The value of the hours spent by DOEE staff to support the audit and develop an error rate that should have been developed by WatsonRice, should be included in a remedy. DOEE can provide this information along with documentation to the Commission.
4. Inflation (kWh vs \$): The value of underpayments owed to subscribers should be credited to customers based in today's kWh, or adjusted for inflation to reflect the true value of underpayments if provided in the form of a dollar value credit.
5. Future audits: Given that we now know that the root of Pepco's chronic underpayments had more to do with Pepco's billing practices, than its practice of reading the wrong production

meter on CREFs, DOEE recommends that the Commission consider conducting periodic audits of Pepco's crediting practices on a going forward basis. This is particularly apropos given, as will be discussed in the "Method" section of Attachment A, and illustrated in the accompanying Figure 3, the sharp downward trend in crediting accuracy observed during the final year of audit period across all CREFs. DOEE recommends that Pepco provide information sufficient to determine the accuracy of CREF billings every two years initially. Depending on the results of this initial audit the Commission could consider conducting them less or more frequently.

6. The Commission may consider any other remedies that would be warranted in light of the added time, expenses, and delays associated with completing this reconciliation process due to the lack of timely and complete information provided by Pepco on CREF crediting and unsubscribed energy payments (as opposed to CREF production).

Further Requests:

DOEE has identified several outstanding items from the original complaint brought before the Commission. If these issues were addressed as described below, it would not only reduce credit and payment errors but also would make accounting more transparent.

1. Direct Pepco to provide DOEE and all CREF owners with the formula and accounting Pepco uses for determining unsubscribed energy payments, specifically what factors into the ancillary service charge adjustment, and specifically:
 - a. Monthly reporting on the kWh to accompany Pepco's monthly payment for unsubscribed energy each month.
 - b. Statements showing how the payment is calculated, similarly to how a CREF subscriber can see how their credit is calculated on a Pepco bill.
2. Provide Standard Operating Procedures (SOP) for Pepco's Community Solar Portal (CSP) and CREF billing system to understand if and where issues are arising.
3. For interested subscriber organizations, such as DOEE, update Pepco CSP capabilities to create a single CREF aggregation or fungible pool of production to subscribe residents based on kW instead of percentage. This would provide resiliency against production changes and ensure CREF subscribers are receiving equitable credits.
 - a. For interested subscriber organizations, having one pool of production would make CREF credits more comparable and transparent, which would allow subscription managers to identify errors much more easily.
 - b. DOEE acknowledges that this may require a change to the CREF law, as it currently states that a subscription should be based on a percentage of the CREF's capacity.

DOEE appreciates the opportunity to provide a recommendation for a path forward and would be happy to participate in a Technical Conference to discuss further and clarify our findings.

ATTACHMENT A

Attachment A

CNM Error Rate Calculation

The following sections detail the data used, assumptions made, and methodology for calculating the CNM credit error rates.

Data

The audit sample includes 38 CREFs that met the 1% materiality threshold, eleven of which are SFA CREF aggregations. The time period that data has been made available for is the date the CREF received ATO to August 2023. The following e-Bridge files were relevant to the CNM error rate calculation:

1. *Confidential Subscriber Credit Bill Data*: Subscriber credit data were added to e-Bridge after issuance of Order No. 22415. The “Subscriber Credit” column provides every credit in dollars for every CREF subscriber during the audit period (for the CREFs and years of data provided).
2. *Underpayments Remediation Report*: This report is provided for every CREF site in the audit sample and includes monthly aggregated production and subscriber data necessary to calculate an error rate. The relevant columns in this report include “CREF Subscriber Allocation (kWh)” (1.k.), which provide the generation allocated to subscribers in each month from ATO to August 2023. “Retail Rate” (1.h.) provides the rate at which the subscriber allocation is valued for that month, on average. Lastly, “Number of Subscribers” (1.e.) provides an exact subscriber count on the CREF for every month.

Assumptions:

To calculate an error rate that accurately captures subscriber underpayment, the following assumptions and decisions were made:

1. The reconciliation of CNM credits will not involve a claw back of overpayment from CREF subscribers.
2. The meter installed by the CREF developer should be used to calculate the error rate given that this is the meter that monthly subscriber allocation should be determined by under the law and PSC’s decision in Order No. 21600.
3. The error rate for this analysis will only be based on the eleven SFA CREF’s included in the audit sample where an Underpayments Remediation Report is available.

Method:

The value of CNM credits allocated to each subscriber is calculated by multiplying the quantity of kilowatt hours allocated to each subscriber by the subscriber’s CREF credit rate.¹ For the purposes of developing an error rate, this calculation can be aggregated by month for each CREF, using the columns in the Underpayments Remediation Report and Subscriber Credit Bill data described above.

First, the Underpayment Remediation Reports are appended to create one table, with every row representing each month from ATO to August 2023 for every SFA CREF in the audit

¹ D.C. Code § 34-1518(b)(5)(I). See also D.C. Code § 34-1518(b)(5)(J) (“Each billing month, the value of the credits allocated to each subscriber shall be calculated by multiplying the quantity of kilowatt hours allocated to each subscriber by the subscriber’s CREF credit rate.”).

sample.² Then, several new columns are added to this table for the error rate calculation, using the formulas below. The “Credit Owed” column contains the total amount of credits owed to subscribers on a CREF for each month and is calculated by multiplying the “CREF Subscriber Allocation (kWh)” by the “Retail Rate” column. The “Bill Credit” column represents the total credit subscribers received on their bills for that month and is calculated by summing the “Subscriber Credit” by month and CREF. These two columns are subtracted to create a “Monthly Error” column, with negative values representing underpayment and positive values representing overpayment. Lastly, the “Monthly Error” column is divided by the “Number of Subscribers” column to create “Error per Subscriber Month.” The final table has 336 rows, each containing the total monthly error and average monthly error per subscriber for every CREF from ATO to August 2023.

$$\begin{aligned} \text{Credit Owed} &= \text{CREF Subscriber Allocation (kWh)} * \text{Monthly Average Retail Rate} \\ \text{Monthly Error} &= \text{Bill Credit} - \text{Credit Owed} \\ \text{Error per Subscriber Month} &= \text{Monthly Error} / \text{Number of Subscribers} \end{aligned}$$

There are several considerations for determining the method of calculating the error rate. The first is determining what constitutes an error, and over what period of time. As the assumption states above, an error in this context is an underpayment to a CREF subscriber. There are two main timeframes that can be analyzed for the error, monthly and the entire audit period. Every CREF in the sample was either on-net overpaid or underpaid over the audit period, and there was significant variance among the sample (Figure 1). When broken down further, all CREFs experienced months of overpayment and underpayment, with the on-net underpaid CREFs experiencing more frequent and larger months of underpayment than the on-net overpaid CREFs. Additionally, the errors varied over time with increasing underpayments towards the end of the audit period. Figures 2 and 3 indicate the variation of error over time and the trend of underpayments in the final year of the audit period. This variation of error between CREFs and over time emphasizes the need for more comprehensive data for the CREF population beyond the chosen sample. With this in mind, DOEE identified several paths for an error rate calculation that aim to quantify underpayments of CREF subscribers. Each of the three scenarios below present an option for an error rate in a dollar per CREF subscriber format. The following section describes how these would be extrapolated beyond the audit period and to include subscribers of CREFs that weren’t included in the audit sample.

² See Attachment A1.

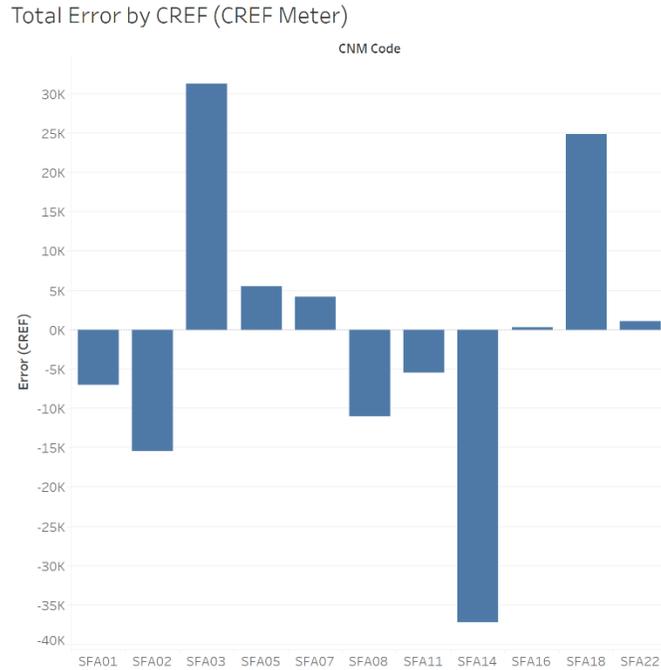


Fig. 1. On-net overpaid and underpaid CREF’s. The negative bars represent CREF’s that were underpaid, while the positive bars were overpaid over the entire audit period. Note the diversity in underpayments and overpayments across different CREFs. Also note that whether a CREF as a whole was underpaid or overpaid does not necessarily equate to whether an individual CREF subscriber was overpaid or underpaid, due to variations over time in the population of residents who subscribe to each CREF.

Error by Audit Year

CNM Code	Billing Period			
	2020	2021	2022	2023
SFA01	42,297	-30,762	-3,142	-15,369
SFA02	1,883	-6,042	-5,266	-6,011
SFA03	8,770	8,419	16,872	-2,761
SFA05	9,951	3,720	625	-8,799
SFA07		6,009	3,191	-5,016
SFA08		-4,693	1,451	-7,710
SFA11	3,699	-983	-559	-7,577
SFA14		-504	-9,919	-26,802
SFA16			8,014	-7,718
SFA18		1,920	17,435	5,490
SFA22			294	793
Grand To..	66,600	-22,915	28,997	-81,480

Fig. 2: Error per CREF per audit year.

Error by Month

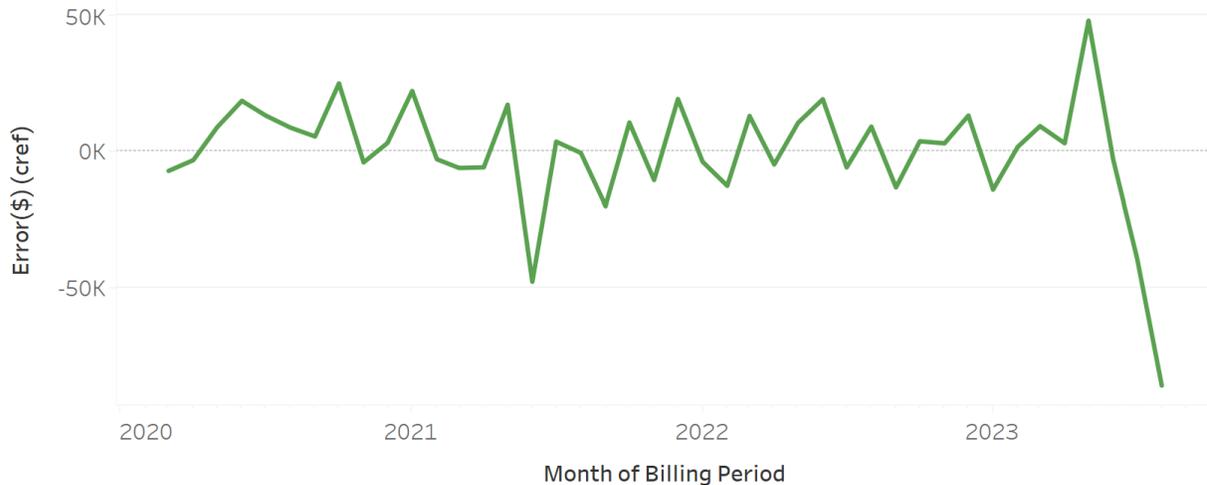


Fig. 3. Total monthly error.

Error Rate Scenarios:

Scenario #1: “On-Net Underpaid”

As described above, some CREF’s were on-net underpaid while others were on-net overpaid over the audit period. It is reasonable to assume that subscribers to the on-net underpaid CREFs were, on average, in a comparatively worse off position to those subscribed to the on-net overpaid CREFs. In this scenario, a dollar per subscriber error rate can be calculated only for the CREFs that on-net were underpaid. In this scenario, the “Error per Subscriber Month” was averaged for only these CREFs and the resulting error rate is an underpayment by an average of \$1.42 per month per subscriber. For a subscriber enrolled for the entire audit period, this would be a lump sum credit of roughly \$61.

Scenario #2: “Underpaid Months” [Recommended Approach]

All CREFs in the sample experienced months of underpayment and overpayment. Given the above assumption that overpayments will not be clawed back from subscribers, this error rate scenario isolates the months of underpayment. This scenario may be reasonable to use in light of the changing populations of CREF subscribers, which can vary month to month, making it difficult to assume that under-payments for one month would be rectified by over-payments from another month. Moreover, any month of underpayment harms a subscriber and the goals of the SFA program because subscribers expect a certain credit amount for the time of year, and an underpayment can fail to meaningfully benefit the subscriber. When isolating the months of underpayment, the error rate for this scenario is an average underpayment of \$5.70 per subscriber per month. For a subscriber enrolled for the entire audit period, this would be a lump sum credit of roughly \$245.

Scenario #3: "Underpaid months On-Net"

The last scenario for an error rate calculation isolates the months of underpayment, only for the CREFs that were on-net underpaid. Following the logic of the first option, this scenario aims to capture the underpayment for subscribers that were on-net underpaid, without netting out the error rate with months of overpayment. This error rate was calculated to be an average underpayment of \$6 per month per subscriber. For a subscriber enrolled for the entire audit period, this would be a lump sum credit of roughly \$258.

Extrapolation:

While the error rates above are only based on the audit sample of SFA CREFs, a full remediation should take more factors into account to capture the full scope of harm caused by mishandling of CREF crediting. Other factors include the subscribers enrolled on the other CREFs that were active during the audit period but excluded from the sample, the time beyond the audit period in which errors were likely still occurring, and non-CREF Standard Offer Service (SOS) customers that may have been burdened by CREF overpayments.

Non-sample Subscribers: As described in earlier sections, only eleven SFA CREFs met the materiality threshold based on production variance and were included in the sample size. Had the materiality threshold been for CNM crediting differences, the audit sample likely would've captured more of the CREF population. Additionally, analysis of the monthly errors over time revealed an increase of underpayments towards the end of the audit period. It is unclear what, if any, steps were taken to reduce errors during and after this period. For these reasons, it can be reasonably assumed that there were the same, if not more errors on the CREFs excluded from the audit sample. There are twelve other active SFA CREFs during the audit period that were not included in the sample, whose subscribers would need to be factored into a total error estimate.

DOEE developed estimates of the total dollar value of credits owed to subscribers for all SFA CREFs that were active during the audit period. For each scenario, the error rate was multiplied by DOEE's record of the average number of subscribers for each CREF excluded from the sample and then multiplied by the number of months it was active during the audit period. These totals were added to the totals for the CREF sample and range from \$194,000-\$1,200,000 depending on the error rate used. This exact figure would require a decision about which subscribers are deemed to be affected by underpayment (those subscribed to an on-net underpaid CREF or any subscriber that experienced a month of underpayment), the relevant time frame, and additional data such as the monthly number of subscribers for each CREF.

Post-Audit Period: Order 21600 directed Pepco to provide a dataset for the audit from "ATO to date."³ The Underpayments Remediation Reports provide subscriber and production data from ATO to August 2023, which is when Pepco began the process of removing their meters from CREFs. However, there is no indication in the data that CNM crediting errors were caused by the meter variance. This makes August 2023 an arbitrary end date as there is no evidence that the crediting errors stopped after the meters were removed. The error rate should be further

³ Order No. 21600, ¶40.

extrapolated to remediate underpayments in the time after the audit and adjusted for inflation to capture the value of underpayments.

Non-CREF SOS Customers: An additional consideration relevant to Formal Case No. 1017, is to consider what, if any, relief may be appropriate for SOS customers that are not subscribed to a CREF but may have shouldered the burden of overpaying for CREF generated energy.

ATTACHMENT A1

SA07	2661	1725.99	2022-01-26 00:00:00	2022	January	2022Jan	1133885	27	579	0.96286	72345	7774	74860.44	0.08231	2790.334	229.4768	2887.561	237.484	-47.027	1.97860678	9962.81506	8707.76	15.039915	1255.07106	-1.2165732			
SA07	3541	1299.32	2022-02-03 00:00:00	2022	February	2022Feb	1140257	27	575	0.97958	10388	11889.33	10881.207	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	11111.76	122.80368	1255.07106	-1.2165732		
SA07	5861	1193.93	2022-02-10 00:00:00	2022	March	2022Mar	1145644	27	576	0.98221	20215	18196.45	16454.64	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	18111.83	1146.611	1525.07106	-1.2165732		
SA07	9067	879.1207	2022-02-16 00:00:00	2022	April	2022Apr	1151644	27	564	0.98884	20218	25131.0	20218.0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	24516.40224	2400.28	425.92519	151.122276	4.9062611	
SA07	9257	215.4456	2022-02-23 00:00:00	2022	May	2022May	1157644	27	562	0.99414	20220	30045.0	24812.0	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	38153.64824	3815.36	648.84824	183.16848	5.2088018	
SA07	11863	991.7499	2022-02-29 00:00:00	2022	June	2022Jun	1164166	27	551	0.98384	23055	34845.0	22929.7	0.00970	200.014	1.414	21013.1	20590.9	12.0968	0.00000	0.00000	0.00000	51378.9132	3416.91	62.281138	277.39781	0.9062611	
SA07	12979	884.5311	2022-03-07 00:00:00	2022	July	2022Jul	1170257	27	547	0.99094	23619	29899.0	24888.4	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970	
SA07	13031	405.21	2022-03-14 00:00:00	2022	August	2022Aug	1176257	27	547	0.99716	24021	31179.0	24117.0	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970	
SA07	19891	189.1837	2022-03-20 00:00:00	2022	September	2022Sep	1181666	27	534	0.98385	23619	21865.0	18818.8	0.00818	1951.83	154.33	19431.0	16148.6	0.00000	0.00000	0.00000	0.00000	28385.8882	2484.4	40.19517	251.48232	-4.02893	
SA07	19911	405.21	2022-03-27 00:00:00	2022	October	2022Oct	1187666	27	534	0.99094	24021	23179.0	18818.8	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	28385.8882	2484.4	40.19517	251.48232	-4.02893	
SA07	3627	2821.08	2022-11-22 00:00:00	2022	December	2022Dec	1140334	27	529	0.98801	96422	121566.0	84754.84	0.05279	13530.03	124.547	144.162	100.502	94.7872	0.00000	0.00000	0.00000	11897.8411	10931.6	20.768592	383.97621	0.7285414	
SA07	2122	2136.31	2022-12-22 00:00:00	2022	January	2022Jan	1140256	27	529	0.98802	96422	121566.0	84754.84	0.05279	13530.03	124.547	144.162	100.502	94.7872	0.00000	0.00000	0.00000	11897.8411	10931.6	20.768592	383.97621	0.7285414	
SA07	3719	1408.37	2023-02-23 00:00:00	2023	February	2023Feb	1138881	27	520	0.98562	88477	103137.0	87712.4	0.00479	13783.29	143.450	138.649	136.159	37.598	118.691	0.00000	0.00000	0.00000	12003.941	12513.3	23.8205	247.88883	0.1206624
SA07	6777	1053.81	2023-03-02 00:00:00	2023	March	2023Mar	1141373	27	508	0.9841	16450	116106.0	147970.2	0.02932	28265.07	343.878	81.833	240.766	91.2711	0.00000	0.00000	0.00000	27900.906	20323.7023	19.74669	27.02264	0.1206624	
SA07	9755	527.283	2023-03-09 00:00:00	2023	April	2023Apr	1146641	27	507	0.98221	20215	18196.45	16454.64	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	28771.26	2877.16	73.48429	3.7474886	0.00000	
SA07	9571	24.44307	2023-03-16 00:00:00	2023	May	2023May	1141733	27	504	0.99488	186974	26000.0	18400.8	0.03734	16373.54	152.508	161.841	120.371	20.3338	0.00000	0.00000	0.00000	26139.4215	23299.6	88.122744	52.917854	1.2281578	
SA07	11231	435.513	2023-03-23 00:00:00	2023	June	2023Jun	1157644	27	509	0.99094	23619	29899.0	24888.4	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970	
SA07	11236	425.264	2023-03-30 00:00:00	2023	July	2023Jul	1171486	27	503	0.98719	23201	25999.0	23955.4	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970	
SA07	10182	130.7309	2023-04-06 00:00:00	2023	August	2023Aug	1164087	27	504	0.99716	24021	23179.0	18818.8	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970	
SA07	11482.52	2023-04-13 00:00:00	2023	September	2023Sep	1170257	27	504	0.99716	24021	23179.0	18818.8	0.00942	2423.0	231.7	24101.6	21361.3	13.4359	0.00000	0.00000	0.00000	31356.2331	3206.3	581.40820	129.42134	-2.3670970		
SA07	4108	1450.83	2023-04-20 00:00:00	2023	October	2023Oct	1176257	14	64	0.17034	1388	23396.0	20612.07	0.02804	4159.189	261.984	107.983	20.783	-0.1192	0.00000	0.00000	0.00000	20200.05173	21681.33	11.89024	-4.9877983	0.00000	
SA07	4888	126.51	2023-04-27 00:00:00	2023	November	2023Nov	1181666	14	64	0.17034	1388	23396.0	20612.07	0.02804	4159.189	261.984	107.983	20.783	-0.1192	0.00000	0.00000	0.00000	20200.05173	21681.33	11.89024	-4.9877983	0.00000	
SA07	4480	1186.18	2023-05-04 00:00:00	2023	December	2023Dec	1187666	14	64	0.17034	1388	23396.0	20612.07	0.02804	4159.189	261.984	107.983	20.783	-0.1192	0.00000	0.00000	0.00000	20200.05173	21681.33	11.89024	-4.9877983	0.00000	
SA07	5820	1976.94	2023-05-11 00:00:00	2024	January	2024Jan	1192823	14	28	0.02118	109986	10223.8	10234.8	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	14070.3178	14932.12	62.74	170.40252	1.5381368	
SA07	7420	1371.69	2023-05-18 00:00:00	2024	February	2024Feb	120823	14	28	0.02118	109986	10223.8	10234.8	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	0.00000	14070.3178	14932.12	62.74	170.40252	1.5381368	
SA07	5480	1582.75	2023-05-25 00:00:00	2024	March	2024Mar	1136961	14	367	0.98719	10103	14071.0	13400.0	0.00477	6661.981	114.185	67.493	321.689	145.02	0.00000	0.00000	0.00000	21009.7545	20240.44	56.164801	183.54497	-1.0080024	
SA07	5180	1460.77	2023-06-01 00:00:00	2024	April	2024Apr	1137778	14	367	0.98719	10103	14071.0	13400.0	0.00477	6661.981	114.185	67.493	321.689	145.02	0.00000	0.00000	0.00000	21009.7545	20240.44	56.164801	183.54497	-1.0080024	
SA07	38160	1064.5	2023-06-08 00:00:00	2024	May	2024May	1137778	14	367	0.98719	10103	14071.0	13400.0	0.00477	6661.981	114.185	67.493	321.689	145.02	0.00000	0.00000	0.00000	21009.7545	20240.44	56.164801	183.54497	-1.0080024	
SA07	2790	440.502	2023-06-15 00:00:00	2024	June	2024Jun	1137778	14	367	0.98719	10103	14071.0	13400.0	0.00477	6661.981	114.185	67.493	321.689	145.02	0.00000	0.00000	0.00000	21009.7545	20240.44	56.164801	183.54497	-1.0080024	
SA07	2320	455.4022	2023-06-22 00:00:00	2024	July	2024Jul	1137778	14	367	0.98719	10103	14071.0	13400.0	0.00477	6661.981	114.185	67.493	321.689	145.02	0.00000	0.00000	0.00000	21009.7545	20240.44	56.164801	183.54497	-1.0080024	
SA07	1736	1594.507	2023-06-29 00:00:00	2024	August	2024Aug	1133885	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	2920	787.492	2023-07-06 00:00:00	2024	September	2024Sep	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	3896	1052.402	2023-07-13 00:00:00	2024	October	2024Oct	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	5200	1479.06	2023-07-20 00:00:00	2024	November	2024Nov	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	4890	1442.09	2023-07-27 00:00:00	2024	December	2024Dec	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	1840	1802.49	2023-08-03 00:00:00	2025	January	2025Jan	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	6420	1199.54	2023-08-10 00:00:00	2025	February	2025Feb	1134028	14	373	0.97315	18791	52022.0	39002.8	0.04444	2147.614	95.8088	219.018	81.237	51.6035	0.00000	0.00000	0.00000	12062.5871	11010.69	25.404379	52.94079	0.00000	
SA07	1280	1545.21	2023-08-17 00:00:00	2025	March	2025Mar	1134028	14	373	0.97315	18791	52022.0	39002.8															

CERTIFICATE OF SERVICE

I hereby certify on this 24th day of September 2025, that I caused true and correct copies of the District of Columbia Government's Response to Commissioner Beverly's Inquiry to be emailed to the following:

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