



Sandra Mattavous-Frye, Esq.
People's Counsel

October 7, 2025

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

Re: Formal Case No. 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding, please find the *Office of the People's Counsel for the District of Columbia's Proposed Roadmap for the Integrated Distribution System Planning Working Group ("IDSP WG")*.

If there are any questions regarding this matter, please contact me at 202.727.3071.

Sincerely,

/s/ Ade Adeniyi

Ade Adeniyi

Assistant People's Counsel

Enclosure

cc: Parties of record

OPC’s Proposed Roadmap for the IDSP Working Group.¹

Topic Area	Stakeholder	Focus Area	Status/Notes	Specific Recommendations
Load Forecasting	Pepco	Traditional forecasting of New Business and new kWh consumption		Provide granular data at the feeder level which are the Construction Recommendations.
	Government: City/DOEE	Electrification Goals and Federal policies (Pepco has no control of implementation)	Pepco does not include future programs in current load forecasting. Issues with location of future loads. Need adoption patterns and demand/energy needs.	DOEE provides future load with adoption patterns to be incorporated into Pepco’s projections.
	Government: City/DOEE	Transportation Electrification Goals and Federal policies (Pepco has no control of implementation)	Pepco does include “anticipated EV charging loads” Issues with location of future loads. Need adoption patterns and demand/energy needs.	DOEE provides future load with adoption patterns to be incorporated into Pepco’s projections.
Planning Criteria	Pepco	Operational Criteria: Voltage capacity, N-1, etc.		
	Pepco	Aging Infrastructure		Needs more transparency on prioritization and investment planning.
	Pepco/PSC	Reliability Goals		EQSS Goals.
	Pepco	Resiliency Goals	Stated but integration with climate and DER goals needed.	Climate vulnerability assessments need to be documented (heat, flood, wind, lightning, etc.). Use of DER to meet goals.

¹ The Office of the People’s Counsel for the District of Columbia proposes this Roadmap for Integrated Distribution System Planning Working Group established by the Public Service Commission, in Order No. 22464.

Load Shaping - Traditional	Pepco	Demand Side Management	Potential for more aggressive implementation.	Benefit Cost Analysis to expand this program.
	Pepco	Conservation Voltage Reduction	Potential for more aggressive implementation. Also helps with DER saturation.	Benefit Cost Analysis to expand this program. Pepco is working on expansion but lacks transparency and BCA. Include impact to DER with low operating voltage.
	City	Energy Efficiency Programs	Future EE not included in Pepco's forecast. Need adoption patterns.	DOEE provides future load with adoption patterns to be incorporated into Pepco's projections.
	City/DOEE	Goals for additional DER within the District (outside of Pepco Control)	Not included in Pepco's forecast. Need adoption patterns.	DOEE provides future load with adoption patterns to be incorporated into Pepco's projections. Map of existing solar and map of potential solar from District's total roof area.
Load Shaping – Enhanced	Pepco	DERMs for DER	Pepco in early stages of software acquisition.	Need Stakeholder review of capabilities of the system planned by Pepco.
	Pepco	Control of EV loads	Several years into the future	Benefit Cost Analysis for new program to control EV loads. May include TOU options and third-party aggregators.
	Pepco	Shift from Summer peak to Winter Peak	Change in load shape projected in 2039	Natural occurrence if electrification of heating occurs. Need to consider the impact of long-range planning.
	City	Energy Efficiency of electrification initiatives	Not included in Pepco's forecast	DOEE provides future load with localized adoption patterns to be incorporated into Pepco's projections.
Transparency	Pepco	Substation Projected Peak	Currently Reporting	Reference Attachment A of ACR.
	Pepco	Feeder level Projected Peak	Internal projections and	Need to develop a means of transparency for data that may be CII.

			often identified as confidential	
Pepco	Forecasted: DER Electrification Transportation Load Shaping		Does not exist in current forecasting	Incorporate inputs from DOEE to determine new load shape/new peak projections.
Pepco	New Projects with alternate plans		Reported in Rate Cases	Stakeholders should review and affirm data as shown in FC 1176 Rate Case Cantler Testimony Exhibit H2.
Pepco	Construction Reports		CII data	These are internal reports and need to be modified for stakeholder consumption. Reference FC 1182 Pepco Confidential Response to OPC DR4-32.
Pepco	Transmission & Substation Plans		CII data	Need to verify application of new load projections.
Pepco	Aging Infrastructure PILC cable Sub. Equipment Transmission cables 4kV conversion		Not well defined	Pepco provides budgets but not the basis for the replacements/expenditures, i.e. what is the goal being achieved and at what pace? 4kV conversion master plan should be updated.
Pepco	Automation Programs 4kV SCADA Remote Monitoring System (RMS) DSM AMI upgrade (future)		Some reporting in ACR	Reporting automation programs will be extended to DERMs, DSM, CVR, etc. Therefore, the reporting needs to be clear for stakeholders relative to the goals.
Pepco	DERMs		Budgets for programs in place	Need more transparency on functionality of proposed systems.
Pepco	ADM		Budgets for programs in place	Need more transparency on functionality of proposed systems.
Pepco	Communication Platforms required for DERMs and ADM		Budgets for programs in place	Need more transparency on functionality of proposed systems.

Design	Pepco	Responsible for all designs of the grid	Pepco's sole responsibility to design	
	Stakeholder	Review and comment		Stakeholders define their input/comment.
	City/DOEE	Program designs around Electrification, Transportation, and DER goals	No reporting methodology within the IDSP	City/DOEE goals and projections may be published or otherwise made available to all Stakeholders.
	PSC	Prudency Review within Rate Case		
Expanding DER	Pepco	Updated Hosting Maps		Hosting maps being discussed in FC1050. For the IDSP, these hosting maps need to feed into and influence DOEE projections of DER adoption.
	Pepco	Penetration Analysis	New	New Study for the proposed working group in Order 22464. Information should be used by DOEE and Pepco to determine impacts on projections and localization of the new DER. This study may direct Stakeholders to portions of the grid that can support DERs.
	Pepco	V2G analysis	New	Not included in Order 22464 but V2G is within a 10-year planning horizon and should be incorporated with DERMs and load planning.
	Pepco	Non-wires Alternatives for capacity issues	Needed for each system capacity upgrade (substation and feeder level)	A BCA should be determined for NWA. Analysis by Pepco in Capital Grid case included limitations of recharging BESS for prolonged equipment failure contingencies.
	Pepco	Expanding Behind the Meter BESS Value streams	New	How can customers be incentivized to add BESS to their homes/businesses. Peak shaving, ancillary

				services, etc. Pre-wiring for electrification.
	Pepco	Re-define Firm Resources	New	Stakeholders and Pepco need to review the application of DER as firm resources for peak and contingency planning.
Climate Resilience, Electrification and Equity	Pepco	Climate vulnerability assessments	Pepco Resiliency goals (stated above)	
	Pepco	Managed Charging	See Load Shaping Above	
	Pepco	Preparedness to support electrification	See Load Projections. Long Range planning should address in Trans/Sub 10 Year Plans	
		Environmental Justice	To prioritize equity & environmental justice communities	Mapping of RAD meters within the District may reveal areas for consideration. Expand community-based damage prevention initiatives. Communication to the public for IDSP awareness and safety.

CERTIFICATE OF SERVICE

Formal Case No. 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities

I certify that on October 7, 2025, a copy of the *Office of the People's Counsel for the District of Columbia's Proposed Roadmap for the Integrated Distribution System Planning Working Group ("IDSP WG")* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

Brinda Westbrook-Sedgwick
Commission Secretary
Jamond D. Perry
Acting General Counsel
Public Service Commission
of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005
bwestbrook@psc.dc.gov
jperry@psc.dc.gov

Brian Caldwell
Assistant Attorney General
Office of the Attorney General
for the District of Columbia
400 6th Street, N.W., 10th floor
Washington, DC 20001
Brian.caldwell@dc.gov

Shilpa Sadhasivam
Special Assistant Attorney General
Office of the Attorney General for the
District of Columbia
Public Advocacy Division
Housing and Environmental Justice Section
400 6th Street, N.W., 10th Floor
Washington, D.C. 20001
Shilpa.Sadhasivam@dc.gov

Larry Martin
Grid2.0 Working Group
3407 34th Place, NW
Washington, DC 20016
lmartin@gmail.com

Dennis Jamouneau
Potomac Electric Power Company
701 Ninth Street, NW,
Washington, DC 20068
djamouneau@pepcoholdings.com

/s/ Ade Adeniyi
Ade Adeniyi
Assistant People's Counsel