



Public Service Commission of the District of Columbia
1325 G Street, NW - Suite 800 Washington, DC 20005
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PUBLIC COMMENTS

Date/Time Sent: Oct 30 2025, 11:47AM

To: Brinda Westbrook-Sedgwick, Commission Secretary

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What is your position regarding the issues identified in the procedural schedule for this case?

Support



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1. Background and Introduction

We Power DC is a rate payer advocate group for DC residents, advocating for affordable bills, clean energy, and in the longer run, a city-owned power utility. Our commitment to fair prices and green energy make us strong supporters of both residential and community solar in DC.

As a campaign devoted to advancing clean energy, energy affordability, and grid resilience, we are deeply familiar with DC's legislative and regulatory landscape related to solar, DERs, and other advancements to decarbonize the local grid. We have found that Pepco's current interconnection queue is clunky, slow, and detrimental to DC residents looking to benefit from advancements in solar technology and policy in the past several years. Outside of supporting this temporary solution for expediting interconnection, **We Power DC supports updating interconnection permitting, timelines, and cost transparency.**

Additionally, We Power DC applauds the Commission for amending the current interconnection rules (RM 40) to include additional cost transparency.

Proposed Interim Solutions

We Power DC strongly supports the Commission in issuing a temporary directive to expedite interconnection of projects in the queue through the end of this year so project owners may benefit from the ITC. Delaying these projects, or letting them remain in the queue at the current rate, endangers them to real economic harm when the ITC expires, leaving project owners with a larger bill than expected and leading to potential project cancellation.

We Power DC recommends the following temporary solutions:

- Support the Commission's position to prioritize the most urgent projects currently in the interconnection queue, based on urgency defined by expected capacity, place in queue, and difficulty of interconnection. We defer to the Commission's standard of urgency.
- Support the approval of flexible, non-export interconnection for projects for sole-consumption. Approval of these projects allow owners to utilize the ITC while operating under a temporary authorization for sole-consumption while additional interconnection work is completed after the 2025 calendar year. Project owners may further interconnect with the grid for export use once the 2025 calendar year concludes.
- This will allow project owners and customers to immediately utilize the ITC and their investment while prepping them for additional interconnection benefits.

Commission Actions

For the economic benefit of DC residents and businesses, and to further support DC's climate laws, We Power DC respectfully requests that the Commission pursue the following:

- Prioritize expedited approval of DER projects in the interconnection queue based on both timing, place, and projected capacity. Encourage Pepco to act favorably and swiftly to interconnect these projects so project owners may benefit from the ITC before year's end.
- Support and approval flexible, non-export interconnection for projects for sole-consumption on a temporary basis. Allow these projects to be reassessed after 2025 concludes if project owners are seeking export to the Pepco grid.

1. Conclusion

We Power DC agrees with the PSC's inquiry that Pepco and the PSC must expedite interconnection of projects in the queue so customers and project owners benefit from the expiring ITC. This is paramount to the economic and environmental health of the District, and shows expertise and willingness to act on behalf of the public good.

Additionally, We Power DC supports the approval of flexible, non-export interconnection for projects for sole-consumption. This action will alleviate much of the pressure in the queue's current backlog while directly supporting both a customer's economic and environmental benefits and building customer trust in our regulatory bodies.

We Power DC once again thanks the Commission for its proactive approach with this Notice of Inquiry.



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ACKNOWLEDGEMENT OF PUBLIC COMMENTS

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Docket Number: FC1050 - 518

Thank you for your submission of comments regarding FC1050. Your comments have been docketed in the case and are available on our website, www.dcpSC.org.

Regards,

Brinda Westbrook-Sedgwick
Commission Secretary
(202) 626-5150