

Kunle Adeyemo
Assistant General Counsel

EP9628
701 Ninth Street NW
Washington, DC 20068-0001

Office 202.428.1122
Fax 202.331.6767
pepco.com
Kunle.adeyemo@exeloncorp.com

January 7, 2026

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

Re: RM-9-2025-01-E, In the Matter Of 15 DCMR Chapter 9 – Net Energy Metering and
Formal Case No. 1171–In the Matter of the Investigation into the Community Renewable
Energy Facilities Practices Letter Requesting Deferral of Commission Action Pending
Ongoing Discussions Regarding DOEE Methodology

Dear Ms. Westbrook-Sedgwick:

Potomac Electric Power Company (“Pepco” or “the Company”) submits this letter to update the Public Service Commission for the District of Columbia (“Commission”) on the ongoing discussions with the Department of Energy and Environment (“DOEE”) regarding DOEE’s proposed error-rate methodology for Community Renewable Energy Facilities (“CREFs”), submitted in response to Commissioner Beverly’s July 31, 2025, inquiry.

Since DOEE’s September 25, 2025, filing, the Company and DOEE have engaged in substantive discussions to review the assumptions, data inputs, and application of the proposed methodology. Through collaborative review of actual billing history, both parties have reached agreement on the total amount owed to subscribers. As of December 2025, all impacted subscriber refunds have been issued. Attachment A provides a breakdown of the affected Solar for All (“SFA”) facilities and subscriber counts.

This resolution addresses the questions raised in the Audit/Reconciliation ordered by the Commission. With the data verified and payment differences resolved, both DOEE and the Company agree that applying an error-rate methodology applicable to all SFA customers is no longer necessary, because the Company can identify the specific impacted accounts. Importantly, the Company has compensated those impacted customers by initiating refunds.

Additionally, the Company appreciates DOEE's recommendations for forward-looking improvements to transparency, administration, and crediting processes:

Unified Production Pooling:

DOEE requests an update to the Company's Community Solar Portal ("CSP") to enable an aggregated production pool for Subscription Organizations ("SOs") to allocate to subscribers. The Company values this suggestion and will assess feasibility, including system updates, operational changes, and cost implications.

Streamlined Capacity Updates:

DOEE requests a streamlined process for editing solar site capacities in the CSP when "as-built" CREF site capacity changes. The Company will evaluate the feasibility and requirements for this change.

Allocation Reporting Alignment:

DOEE requests that semi-annual allocation reporting proposed in the Notice of Proposed Rulemaking ("NOPR") does not interfere with the monthly process of adding or removing subscribers. The Company believes the current subscriber process is sufficient but will continue to monitor for potential improvements.

The Company values these suggestions and will continue to evaluate their feasibility as part of ongoing engagement with DOEE and other stakeholders. The Company appreciates the Commission's consideration of this update and respectfully requests that the Commission defer action until discussions conclude and final findings are formally presented. The Company remains committed to working collaboratively with DOEE, the Commission, and stakeholders to ensure that CREF billing is accurate, transparent, and consistent with Commission directives.

Respectfully submitted,

/s/ Kunle Adeyemo

Kunle Adeyemo

Enclosures

cc: All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that a true copy of Potomac Electric Power Company's Letter regarding ongoing discussions with DOEE served on the parties of record in Formal Case No. RM9-2025-01 and FC1171 by electronic mail this 7th day of January 2026:

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street N.W. Suite 800
Washington, DC 20002
bwestbrook@psc.dc.gov

Frann G. Francis, Esq.
Apartment and Office Building
Association of Metropolitan
Washington
1050 17th Street, NW, Suite 300
Washington, DC 20036
ffrancis@aoba-metro.org

Amy Klaviter
Integrays Energy Services
500 West Madison Street
Suite 3300
Chicago, IL 60661
aklaviter@integraysenergy.com

Herbert Harris, Chairman
Consumer Utility Board
1133 15th Street NW,
Suite 500
Washington, DC 20005
dccub@msn.com

Jay Dillarou
Mid-American Energy
4299 NW Urbandale Drive
Urbandale, IA 50332
info@midamerican.com

Dr. Taresa Lawrence, Esq.
DC Department of the Environment
1200 First Street NE 5th Floor
Washington, DC 20002
taresa.lawrence@dc.gov

Robert I. White
District of Columbia Water
and Sewer Authority
1201 Pennsylvania Avenue, NW
PO Box 407
Washington, DC 20044
rwhite@ssd.com

First Energy Services
341 White Pond Drive
Akron, OH 44320
fesmarketpolicies@fes.com

Divesh Gupta, Esq.
Constellation NewEnergy, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divest.gupta@constellation.com

Brian J. H. Lederer, Esq.
International Brotherhood of Electric
Workers (IBEW) Local 1900
3003 Van Ness Street, NW
Suite W228
Washington, DC 20008
brian.lederer@att.net

Jon M. Casadont
AEP Energy, Inc.
363 West Erie Street Suite 700
Chicago, IL 60610
jcasadont@bluestarenergy.com

Brian Caldwell, Esq.
Office of the Attorney General for the
District of Columbia
441 4th Street, NW, Suite 450 North
Washington, DC 20001
brian.caldwell@dc.gov

Bernice K. McIntyre
Washington Gas Light Company
101 Constitution Avenue, NW
Washington, DC 20080
bmcintyre@washgas.com

Sandra Mattavous-Frye
Office of the People's Counsel
655 15th Street NW, Suite 200
Washington, DC 20005
smfrye@opc-dc.gov

John Kundert
5640 S. Lamar Street
Denver, CO 80123-0836

Harris Rosen
Liberty Power
1901 W. Cypress Creed Road Ste 600
Fort Lauderdale, FL 33309
hrosen@liberypowercorp.com

Jay L. Kooper
Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095
jkooper@hess.com

Marc E. Biondi, Esq.
Washington Metropolitan Transit
Authority
600 5th Street, NW
Washington, DC 20001
mebiondi@wmata.com

Tom D. O'Leary
Horizon Power & Light
800 Bering Drive, Ste. 250
Houston, TX 77057
tom@hplco.com

Brian T. Castelli
Alliance to Save Energy
1850 M. Street, NW
Suite 600
Washington, DC 20036
bcastelli@ase.org

Telemach N. Chryssikos
Attorney
Washington Gas Energy Services, Inc.
101 constitutions avenue, NW
Washington, DC 20080
macchryssikos@wges.com

Peter Lowenthal
Maryland-DC-Virginia Solar
Energy Industries Association
4707 Elmhurst Lane
Bethesda, MD 20814
director@mdv-seia.org

Brian R. Greene, Esq.
GreeneHurlocker, PLC
1807 Libbie Avenue, Suite 102
Richmond, VA 23226
bgreene@greenehurlocker.com

Leah Gibbons
Reliant Energy Solutions
324 Cedar Lande
Rockville, MD 20851
lgibbons@reliant.com

Naveen Rabie
Suez Energy Resources NA, Inc.
1990 Post Oak Blvd
Suite 1900
Houston, TX 77056-4499
naveen.rabie@gdfsuezna.com

Coralette Hannon
American Association of
Retired Persons
6705 Reedy Creek Road
Charlotte, NC 28215
channon@aarp.org

John B. Britton, Esq.
Schnader Harrison Segal & Lewis, LLP
750 9th Street, NW, Suite 550
Washington, DC 20001
jbritton@schnader.com

Jay H. Dillavou
Mid-American Energy
4299 NW Urbandale Dr.
Urbandale, IA 50332
jhdillavou@midamerican.com

Timothy Oberleiton
Senior Attorney Earthjustice
1001 G St. NW, Ste. 1000
Washington, D.C. 20001
toberleiton@earthjustice.org

Rhone Resch, President
Solar Energy Industries Association
575 7th Street, NW, Suite 400
Washington, DC 20004
rresch@seia.org

Michael Phillips
Nina Dodge
DC Climate Action
Washington, DC 20008
michael.phillips3@verizon.net
ndodge53@gmail.com

Barbara Clay
General Counsel and Senior Vice
President
Public Power, LLC
1055 Washington Blvd., 7th Floor
Stamford, CT 06907
bclay@criusenergy.com

Eric J. Wallace, Esq.
Greene Hurlocker, PLC
4908 Monument Avenue, Suite 200
Richmond, VA 23230
EWallace@GreeneHurlocker.com

/s/ *Kunle Adeyemo*
Kunle Adeyemo