

GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL



BRIAN L. SCHWALB
ATTORNEY GENERAL

Public Advocacy Division
Housing and Environmental Justice Section

E-Docketed

February 4, 2026

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

On behalf of the Department of Energy and Environment (DOEE), please find their Integrated Distribution System Planning (IDSP) presentation ahead of the upcoming IDSP Working Group meeting on February 11, 2026.

If you have any questions regarding this filing, please contact the undersigned.

Sincerely,

BRIAN L. SCHWALB
Attorney General

By: */s/ Shilpa Sadhasivam*
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cc: Service List

Integrated Distribution System Planning: Framework and Requirements for the District of Columbia

Department of Energy and Environment

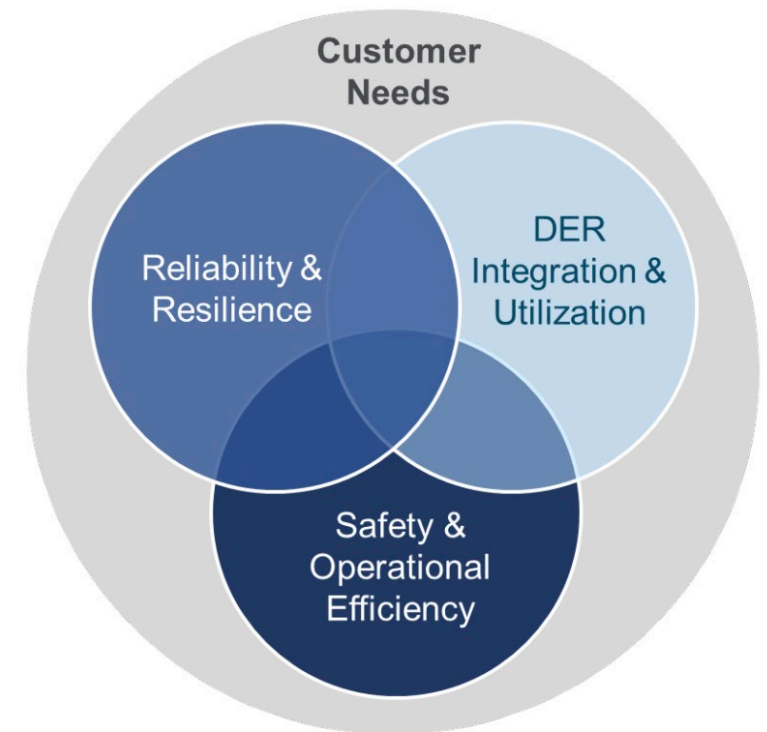
Peter Damrosch, Policy Advisor

Presentation to the IDSP Working Group

February 11, 2026

Overview of Integrated Distribution System Planning

- “An Integrated Distribution System Planning (IDSP) process **provides a decision framework** for developing holistic infrastructure investment strategies for local electricity grids.” Source: [DOE](#).
- DC PSC: “IDSP focuses on **optimizing and modernizing the distribution system** to meet evolving demands from ratepayers. In addition to the traditional distribution planning that . . . utilities undertake, IDSP incorporates advanced technologies, data analytics, and distributed energy resources.” [Notice of Inquiry \(2024\)](#)
- “**Customer affordability** is the global objective that sets the financial constraint for optimizing expenditures to achieve the other planning objectives.” [LBNL \(Jan. 2025\)](#)



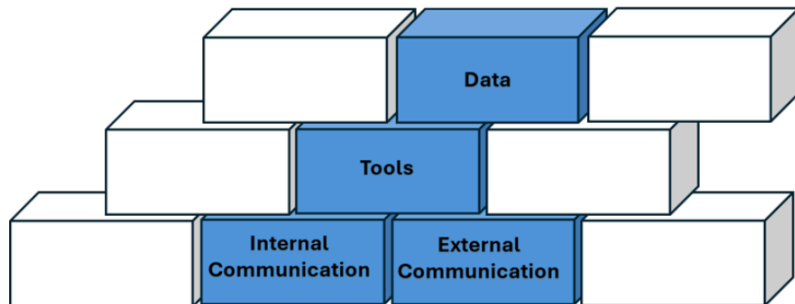
Source: [DOE \(2023\)](#)

Integrated vs. Traditional Planning

Integrating **Stakeholders' Expectations** Into Distribution Planning:

Integrating **Grid Modernization** Into Distribution Planning:

Core activities of
Distribution Planning



Building Blocks of Distribution Planning

Integrating **Transmission and Generation** Into Distribution Planning:

IDSP Developments Around the Country

- “Twenty-two states have IDSP processes underway at various levels of maturity and complexity.” Source: [DOE \(2023\)](#)
- There is now a bounty of high-quality research into models, best practices, and lessons learned from other jurisdictions on IDSP
 - See Appendix: References & Resource Library (below)

IDSP and the District of Columbia

- PowerPath DC / Modernizing the Energy Delivery System for Increased Sustainability (2018-2019)
 - Presentations and recommendations for IDSP in DC
- Pepco Distribution System Planning (DSP) / Non-Wires Alternative (NWA) (2020 to present)
 - Limited initial screening and review process for NWAs; no selected NWAs to date or evaluation cycle to review/improve process
- DC PSC Notice of Inquiry (Nov. 2024)
 - NOI and comments (initial & reply)
- IDSP Working Group: February to August 2026

Principles & Objectives for the IDSP Working Group

- Build on substantial prior work and national research on IDSP
 - PowerPath DC, NOI & comments (2024-2025), DOEE/OPC framework, national research
- Provide specific and actionable set of proposed requirements to the Commission
- Prioritize launching a first IDSP cycle sooner (with a strong starting framework) and learning by doing > delay
- Keep in mind August deadline for final report → work backwards from there

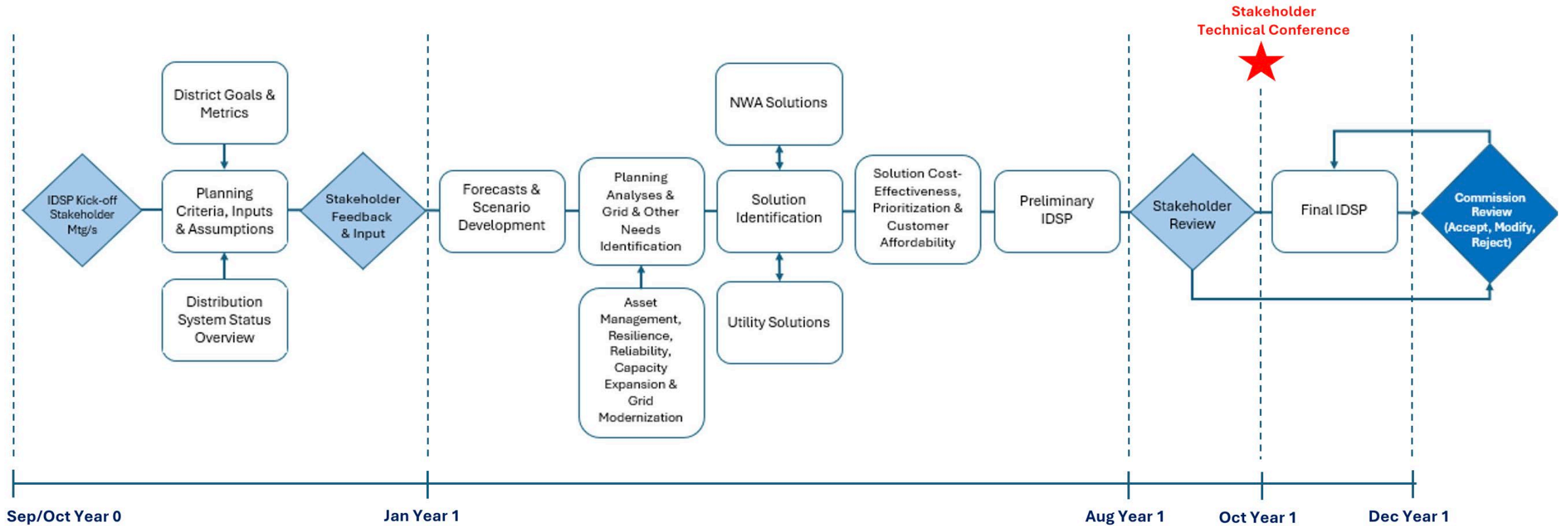
Overview of DOEE/OPC Framework & Requirements

- OPC & DOEE completed substantial work in advance of the working group to help the working group meet its goals
- Focus of this presentation is on the DOEE-OPC proposed “Framework and Requirements for IDSP in DC” (Attachment 1 from January 28, 2026, joint filing)
 - Attachment 1: Detailed framework and set of proposed requirements for first IDSP cycle
 - Attachment 2: Roadmap with additional topics and recommendations for discussion in WG
 - Attachment 3: Summary of existing Pepco reporting related to the distribution system (Excel)

Core Elements of the Framework

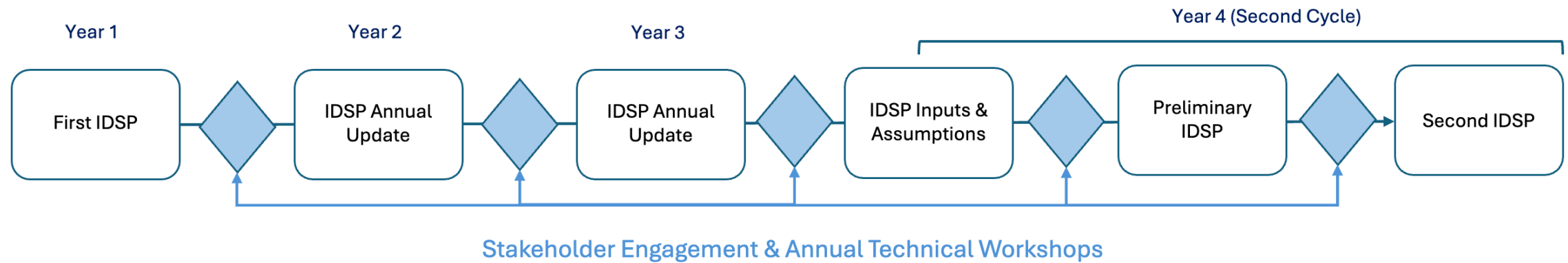
- **Objectives:** Based on NOI and PowerPath DC guiding documents
- **Frequency:** Three-year cycle for the Preliminary & Final IDSP, with Annual Updates in off-years
- **Planning Horizons:** Short (1-3 years), medium (4-6 years), and long terms (7-10 years)
- **Planning Data:** Provision of key planning data (e.g., asset condition, capacity and installed DERs), including based on existing reporting from the Annual Consolidated Report (ACR)
- **Scenario Planning:** Base scenario with high and low variations, with input from stakeholders
- **Grid Needs & Solutions:** Identify grid needs; evaluate possible solutions; provide criteria & analyses for selections
- **Customer Affordability:** Rate impact analyses, cost-effectiveness screening, and prioritization help safeguard affordability
- **Community & Stakeholder Input:** Multiple opportunities and modes for community members, public agencies, and others to review and provide input
- **Commission Role:** Reviews and accepts the plan as meeting the filing requirements; can direct modifications or improvements to current or future IDSPs

IDSP Development Process



*NB: Start and end calendar months are illustrative

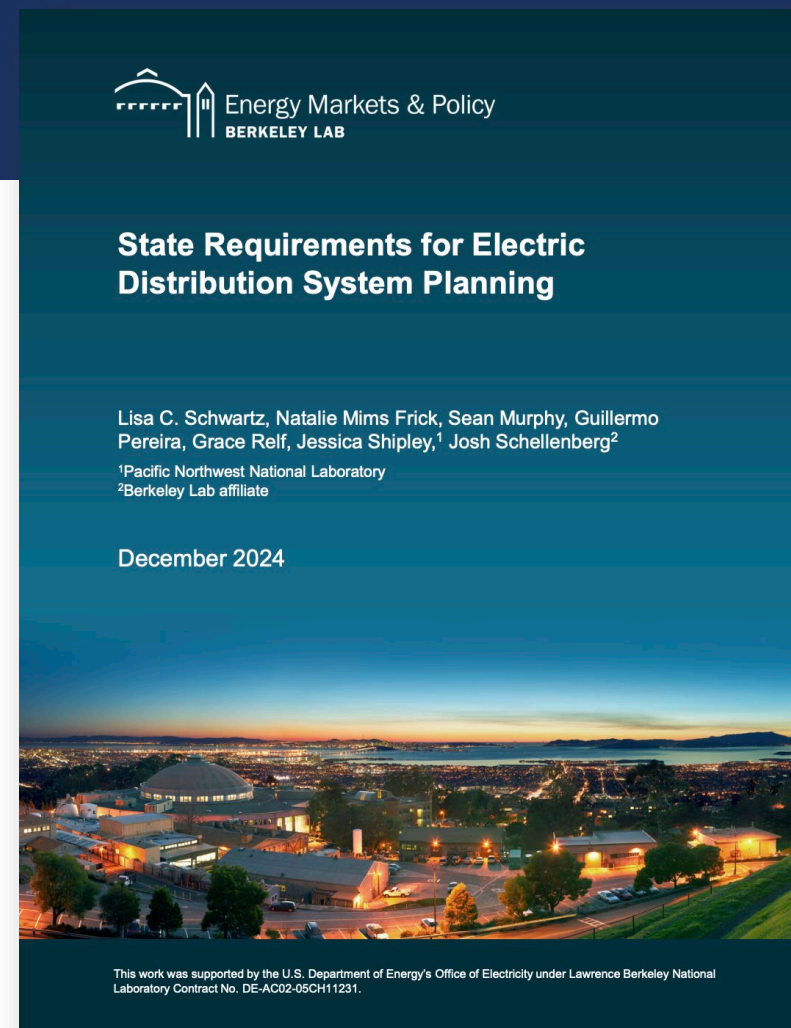
Multiyear Cycle: IDSP & Annual Updates



*NB: This approach is similar to Maryland's and aligns with current annual Pepco DC reporting such as the ACR that could be consolidated into the IDSP

Additional Information

- The IDSP Framework & Requirements document has more detail on specific items for each element of the process (17 pages)
 - Appendix A & B are placeholders for additional planning data and metrics
- Lawrence Berkeley National Laboratory (LBNL) and others have published a wealth of research and resources on IDSP
 - See References & Resource Library (appendix to this presentation)



Source: [LBNL \(Dec. 2024\)](#)

Next Steps

- The IDSP Framework & Requirements is a working draft, meant to evolve in response to feedback
- Action items (near-term)
 - WG members review & provide clarification questions and initial feedback (this week and next)
 - Plan is to revise and recirculate based on feedback (iteratively as working group progresses)
- Additional suggestions
 - Develop timeline and milestones for working group to complete its work (suggested lead: E3)
 - Prioritize early decisions on foundational questions, e.g.: does the Framework provide a good foundation from which to develop final recommendations? (suggested lead facilitator: E3, with contributions from everyone)
 - At an appropriate point, review possibility and mechanics of consolidating existing reporting into the IDSP (e.g., ACR). See Appendix: Summary of Existing Pepco Reporting.

Questions or Comments?

Contact: Peter Damrosch
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APPENDIX

Terminology

- This presentation uses the term “Integrated Distribution System Planning” or IDSP consistent with the DC PSC orders initiating the IDSP Working Group
- Other states, researchers, and utilities uses a variety of similar terms (e.g., IDP or Integrated Distribution Planning)
- [SEPA \(2020\)](#) notes that the word “integrated” can refer to different forms of coordination and alignment when it comes to planning and development of solutions both within a utility and across organizations:
 - “In many cases the ‘integrated’ portion of IDP references integration of NWA’s and other potential solutions to grid constraints into the planning processes. For example, MADRI’s *Integrated Distribution Planning for Electric Utilities: Guidance for Public Utility Commissions* report states, ‘The most essential factor that separates an IDP from a traditional distribution planning process is the integrated considerations of all possible solutions to identified needs.’ In other cases, the term ‘integrated’ refers to increasing coordination between transmission, distribution, and generation planning as well as other activities within the utility.”

Existing Pepco Reporting

- DOEE & Synapse prepared a summary of current Pepco reporting related to distribution system performance
- Organized by high-level categories from LBNL's [Bridging the Gap](#) report (Jan. 2025)
 - Excel version can also be sorted by report and page number
- Useful for multiple purposes, including discussions around consolidating existing reporting

A	B	C	D
Data Category	Data Field	Geographic Level	Report
Load and DER Forecasting	Description of the load forecasting process (including DERs)	N/A	Annual Consolidated Report - Comprehensive Plan
	Description of how DERs are considered in load forecasts	N/A	Annual Consolidated Report - Comprehensive Plan
	Historical customer counts (past 6 years)	Substation	Annual Consolidated Report - Comprehensive Plan
	Historical annual load (past 6 years)	Substation	Annual Consolidated Report - Comprehensive Plan
	Historical annual zonal load (past 11 years)	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Forecast monthly zonal load (next 1 year)	Utility territory	Annual Consolidated Report - Comprehensive Plan
	% of substations with >98% power factor (past 10 years)	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Annual energy losses compared to other PJM utilities (past 10 years)	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Forecast customer counts and billing determinants by class	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Number of demand response customers	Utility territory, substation, feeder	Long-Range Plan Performance Tracking Metrics Report
	Number of customers enrolled in TOU rates (past 5 years)	Utility territory	Performance Tracking Metrics Report
	Number and aggregate capacity of rooftop and community solar systems	Utility territory, ward, substation	Performance Tracking Metrics Report
	Number and aggregate capacity of energy storage systems	Utility territory, ward, substation	Performance Tracking Metrics Report
	Grid Needs Assessment	Description of the planning process for distribution system investments	N/A
Details on substation addition and enhancement projects (project description, timeline, budget)		Substation	Annual Consolidated Report - Comprehensive Plan
Historical spending on routine capital projects (past 5 years)		Utility territory	Annual Consolidated Report - Comprehensive Plan
Future budgets for routine capital projects (next 5 years)		Utility territory	Annual Consolidated Report - Comprehensive Plan
Routine capital projects spending (past year) and budgets (next year) by executive category		Utility territory	Annual Consolidated Report - Comprehensive Plan
Net book value of distribution equipment		Utility territory	Annual Consolidated Report - Comprehensive Plan
Details on Productivity Improvement Plan (PIP) projects (project description, timeline, budget)		Substation, feeder	Annual Consolidated Report - Productivity Improvement Plan
Neighborhoods with increased load growth		Neighborhood	Annual Consolidated Report - Productivity Improvement Plan
Neighborhoods with decreased planned spending on 4kV to 13kV conversions		Neighborhood	Annual Consolidated Report - Productivity Improvement Plan
Updates on Capital Grid Project (construction status, budget, timeline)		Utility territory	Capital Grid Annual Report
Asset Management Strategy	Updates on Downtown Resupply Project (construction status, budget, timeline)	Utility territory	Capital Grid Annual Report
	Estimated energy and capacity savings from transformer purchases	Utility territory	Distribution Transformer Report
	Description of equipment inspection processes	N/A	Annual Consolidated Report - Comprehensive Plan
	Results of feeder inspections	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Description of vegetation management efforts	N/A	Annual Consolidated Report - Comprehensive Plan
	Industry comparisons for reliability metrics (SAIFI, SAIDI, CAIDI)	Utility territory	Annual Consolidated Report - Comprehensive Plan
	Description of storm readiness processes	N/A	Annual Consolidated Report - Comprehensive Plan
	Details on Neighborhood Reliability Enhancement projects (project description, timeline, budget)	Neighborhood	Annual Consolidated Report - Productivity Improvement Plan
	Historical reliability indices (SAIFI, SAIDI, CAIDI) (past 5 years)	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Data on cross jurisdictional feeders	Feeder	Annual Consolidated Report - Productivity Improvement Plan
	Neighborhoods most susceptible to non-major outages	Neighborhood	Annual Consolidated Report - Productivity Improvement Plan
	Frequency and reliability impacts of primary equipment failures	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Analysis of most common equipment failures	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Outage numbers and reliability impacts by cause	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Historical budgets and spending on tree trimming	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Preventative Maintenance Schedule	Utility territory, substation, feeder	Annual Consolidated Report - Productivity Improvement Plan
	Data on tree-related outages	Utility territory, feeder	Annual Consolidated Report - Productivity Improvement Plan
Number of service outages, manhole incidents, and incidents resulting in personal injury or death	Non-major outages >24 hours	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	Status of lead cable replacements	Utility territory	Annual Consolidated Report - Manhole Event Report
	Number of manhole events by type and cause	Utility territory	Annual Consolidated Report - Manhole Event Report
	Number of manhole events by insulation type and voltage	Utility territory	Annual Consolidated Report - Manhole Event Report
	Description and status of slotted manhole cover program	N/A	Annual Consolidated Report - Manhole Event Report

References & Resource Library

- LBNL (Dec. 2024). State requirements for electric distribution system planning: <https://emp.lbl.gov/publications/state-requirements-electric>
- LBNL (Jan. 2025). Bridging the gap on data and analysis for distribution system planning: information that utilities can provide to regulators, state energy offices, and other stakeholders: <https://emp.lbl.gov/publications/bridging-gap-data-and-analysis>
- US DOE (2023). Integrated distribution system planning: principles and approaches: https://www.energy.gov/sites/default/files/2023-11/IDSP%20Principles%2011%2004%20_optimized.pdf
- LBNL. Online catalogue and summaries of state distribution plans: <https://emp.lbl.gov/state-distribution-planning-requirements>
 - Summaries of state plans: <https://drive.google.com/drive/folders/IAQJCVaQCSqZokJ7YGjByUKlhWbsWkRxa>
 - Document library: https://drive.google.com/drive/folders/IhCSgOwEvVckTYcvzvXb96xKALvKx_7Md

References & Resource Library

- EPRI (2024). Distribution system scenario planning: case study and guidance on considering scenarios and investment approaches in distribution planning: <https://www.epri.com/research/products/000000003002030781>
- US DOE (2020). Modern distribution grid: strategy & implementation planning guidebook: https://gridarchitecture.pnnl.gov/media/Modern-Distribution-Grid_Volume_IV_v1_0_draft.pdf

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February 2026, I caused true and correct copies of the presentation on Integrated Distribution System Planning on behalf of the Department of Energy and Environment to be electronically delivered to the following:

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