

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*

March 2, 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. 1167 – In the Matter of the Implementation of Electric and  
Natural Gas Climate Change Proposals**

Dear Ms. Westbrook-Sedgwick:

On behalf of the District of Columbia Government, please find enclosed comments on Potomac Electric Power Company's Second Climate Solutions Plan. If you have any questions regarding this filing, please contact the undersigned.

Sincerely,

LAUREN M. MARKS  
Attorney General

By: /s/ Lauren M. Marks  
LAUREN M. MARKS  
Special Assistant Attorney General  
(202) 256-3713 – Direct  
[Lauren.marks@dc.gov](mailto:Lauren.marks@dc.gov)

cc: Service List

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF:** )  
 )  
**THE IMPLEMENTATION OF ELECTRIC** ) **Formal Case No. 1167**  
**AND NATURAL GAS CLIMATE CHANGE** )  
**PROPOSALS** )

**COMMENTS OF THE DISTRICT OF COLUMBIA GOVERNMENT ON POTOMAC  
ELECTRIC POWER COMPANY’S SECOND CLIMATE SOLUTIONS PLAN**

Pursuant to Order Nos. 22313, 22744, 22791 of the Public Service Commission for the District of Columbia (Commission), the District of Columbia Government (DCG), through the Office of the Attorney General, respectfully submits the following comments on Potomac Electric Power Company’s (Pepco) Second 15-Year Climate Solutions Plan (Second Climate Solutions Plan).

**I. BACKGROUND**

The Commission initiated Formal Case No. 1167 (FC 1167) in November 2020 to determine whether the District’s utilities are “helping the District of Columbia achieve its energy and climate goals” and to “take action, where necessary, to guide the companies in the right direction.”<sup>1</sup> On October 10, 2024, the Commission issued Order No. 22313, which directed the utilities to draft new Climate Business Plans (CBP) and 15-Year Greenhouse Gas Reduction Plans.<sup>2</sup> On November 12, 2024, DCG filed a Motion for Reconsideration of Order No. 22313, highlighting the structural issues of utility-led CBPs and the overall lack of progress in the FC 1167 docket. Instead of proceeding with the status quo in FC 1167, DCG advocated for a change in strategy: initiate separate long-term planning dockets for integrated electric distribution system planning (IDSP).<sup>3</sup> The District also recommended that the Commission and utilities

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<sup>1</sup> Formal Case Nos. 1142 & 1167, Order No. 20662, ¶ 11 (rel. Nov. 18, 2020).

<sup>2</sup> FC 1167, Order No. 22313. WGL’s plan is called the Climate Business Plan while Pepco’s plan is known as the Climate Solutions Plan (CSP). For simplicity, we refer to both as Climate Business Plans or CBPs.

<sup>3</sup> FC 1167, District of Columbia Government’s Motion for Reconsideration of Public Service Commission Order No. 22313 (filed Nov. 12, 2024).

present any other climate or clean energy proposals as needed through subject-matter specific dockets to facilitate making progress on key areas.

On December 10, 2024, the Commission issued Order No. 22339 which granted in part and denied in part the three applications for reconsideration. The Commission reiterated the directives in Order No. 22313 for utilities to file 15-Year Climate Plans and directed Pepco to file an updated electrification study. The Commission, through Order Nos. 22449, 22744, and 22791, set new filing deadlines and comment and reply periods.

## II. COMMENTS

The District has laws and plans detailing requirements for clean energy technologies and greenhouse gas reductions which have been identified in comments by DCG in various Commission dockets. Although the utilities have critical roles to play in advancing these goals, experience has shown that the CBPs are ineffective in advancing the District's climate goals and lack key components to truly make progress on climate initiatives related to electrification and power supply. Challenges to Washington Gas Light Company's (WGL) and Pepco's CBPs are well documented in filings before the Commission.<sup>4</sup> DCG, through its Department of Energy and Environment (DOEE) and Office of Attorney General, has worked extensively with the Commission to evaluate utility programs and develop recommendations to ensure the District's utilities provide quality service to customers while supporting the District's clean energy policies. DCG provides the following proposals for changes to the Commission's planning practice around climate initiatives, as well as initial comments on Pepco's Second Climate Solutions Plan. DCG defers its more detailed analysis and comments on specific proposals in the plan until there is an appropriate venue for them.

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<sup>4</sup> *E.g.*, Formal Case 1167, District of Columbia Government's Motion for Reconsideration of Public Service Commission Order No. 22313 (Nov. 12, 2024).

## **A. Proposals to Change the Commission’s Approach to Utility Climate Planning**

The submission of climate plans in FC 1167 have not advanced the District’s energy goals. Since WGL’s commitment to developing a CBP as part of its merger with the Canadian holding company, AltaGas in 2018, despite many CBPs submitted by Pepco and WGL, no plan or proposal has ever been approved.<sup>5</sup> Prior comments by DCG and the Office of the People’s Counsel (OPC) have documented the challenges with this process, which include the scope and quantity of issues covered by the plans, lack of supporting analysis, absence of Commission direction, and difficulties shoehorning WGL and Pepco into one planning framework. All told, there have been 404 unique filings, comments, and orders in FC 1167, totaling 7,000 pages, without approval or advancement of any specific proposal.<sup>6</sup>

DCG supports the Commission’s objective of engaging in long-term planning related to clean energy and greenhouse gas reductions. To effectively advance the District’s climate laws, the Commission should move beyond the eight-year experiment with utility-led climate planning. DCG urges the Commission to treat the past eight years of utility-led climate business planning as a pilot that can now be restructured. The Commission should learn from local experiences with these plans and alternative models from other states to rethink the planning frameworks needed to make progress on initiatives related to clean energy deployment and greenhouse gas reductions.

To that end, DCG again calls on the Commission to pursue a new approach, grounded in separate long-term planning dockets for the electric and gas utilities and issue-specific dockets for key areas. Many of the core infrastructure needs for Pepco related to electrification and the grid can be addressed most effectively through the forthcoming IDSP process. DOEE and OPC recently filed a detailed joint proposal

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<sup>5</sup> Order No. 19396, Formal Case No. 1142, In the Matter of the Merger of AltaGas Ltd. and WGL Holdings, Inc., Appendix A, Unanimous Agreement of Stipulation and Full Settlement, Merger Commitment No. 79, June 29, 2018.

<sup>6</sup> These figures reflect filings in the docket as of February 2026. They do not include discovery requests, responses, or discovery motions, unless filed in FC1167.

for a new IDSP framework—based in national best practices—that will promote collaborative, transparent, and effective long-term planning for the electric grid.<sup>7</sup>

The Commission should likewise establish a long-term planning process for WGL that is directed by the Commission, rather than driven by WGL, and responds to the well-documented deficiencies in WGL’s planning to date. DCG refers the Commission to a recent white paper by Current Energy Group, filed with the Commission in Formal Case 1167, that provides a framework and in-depth recommendations for conducting long-term gas planning in the District.<sup>8</sup>

In addition, DCG urges the Commission to identify three to four other specific priorities for Pepco and advance those priorities through deeper engagement in their relevant dockets. DCG has previously submitted comments outlining a number of critical needs including reducing barriers to transportation electrification and developing new tools to increase grid flexibility and insulate the District from rising wholesale electricity prices.<sup>9</sup> In addition to overseeing core infrastructure needs through the IDSP process, the Commission should identify three to four specific programmatic or operational priorities for Pepco and ensure those priorities move forward with sufficient depth and timeliness to result in meaningful change. DCG recommends that the Commission both identify the priority area (e.g., demand response or reducing barriers to building electrification) and designate a subject-matter specific docket and timeline where progress on those areas will be made.

## **B. Comments on Pepco’s Second Climate Solutions Plan**

As noted above and in prior filings, the structure of FC 1167—in particular, the open-ended nature of the utility climate plans, which focus on breadth over depth—are not conducive to meaningful review

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<sup>7</sup> FC 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities, Joint Filing on behalf of DOEE and OPC (Jan. 28, 2026).

<sup>8</sup> FC1167, DCG and Current Energy Group, Evolving the District of Columbia’s Gas Distribution System for a Cost-Effective Clean Energy Transition: A Framework for Long-Term Gas Utility Planning (Feb. 12, 2026).

<sup>9</sup> Stakeholders and the Commission have identified various needs from Pepco through comments on Pepco first Climate Solutions Plan (2022), the PSC’s Value of DER Study (2023), the Green Button Data Report (2022), DOEE and DDOT’s letter to the Commission regarding transportation electrification (2025), the two PJM Capacity Auction Task Force reports, and the broader PowerPath DC and MEDSIS Process.

and comments from other parties. In addition, because prior plans and extensive stakeholder analyses have not resulted in Commission decisions on the merits of these plans, we and other parties are increasingly choosing to defer more detailed commentary for when there is an appropriate venue for it. However, DCG provides brief comments on several noteworthy items in Pepco's Second Climate Solutions Plan, recognizing that there is need for improved operations and new initiatives to ensure Pepco continues to contribute to the District's policies of providing affordable, reliable, and clean power while supporting the development of new energy technologies.

At the outset, DCG notes that there are a number of promising ideas in the Second Climate Solutions Plan, but most require deeper analysis and development in concert with relevant stakeholders. For example, support that Pepco could provide to the Building Energy Performance Standards (BEPS) through technical assistance and code support may be helpful or may be redundant with other program offerings from agencies like DOEE. Although Pepco met with DOEE as it was preparing its Second Climate Solutions Plan, conversations focused exclusively at high levels of generality regarding possible topics to address in the plan and not the specifics of program offerings. In other fora, Pepco and stakeholders have begun to dig into the details of some of these proposals. For example, improvements to the public queue for interconnection are being discussed as part of the Formal Case 1050 technical conferences. And in the Formal Case 1176, Multiyear Rate Plan – Lessons Learned Working Group, all working group members agreed to a consensus recommendation for DOEE and Pepco to review and audit the data that Pepco provides to building owners as part of the BEPS program (known as “whole building aggregate data”).<sup>10</sup> DCG encourages Pepco to continue to engage in these collaborations around operational changes and program design and development.

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<sup>10</sup> For additional background on whole building aggregate data, and its importance to the BEPS program, see FC1176, Lessons Learned Working Group Report (Dec. 19, 2025), p. 22 (summarizing DOEE's presentation) and p. 51 (comments of DOEE regarding this consensus solution).

Although Pepco’s Second Climate Solutions Plan includes a number of promising ideas, there are several critical areas for making progress on climate initiatives that are not sufficiently addressed in the Plan. For example, Pepco has a key role to play in facilitating building and vehicle electrification by enabling predictable, affordable, and efficient utility service upgrades and, where possible, helping customers avoid unnecessary utility upgrades. This area—often referred to as improving the “energization” process—is a rising priority in states around the country.

In October 2025, DOEE and Pepco held a day-long workshop on the topic of streamlining utility service upgrades, resulting in a large number of recommendations from industry groups and public agencies for how Pepco can improve the energization process. Several of the proposals in Pepco’s Second Climate Solutions Plan echo recommendations made by participants in DOEE’s October workshop, including offering technical assistance to help customers with site planning and providing support to defray the cost of utility service upgrades (also known as heavy-ups). Other recommendations are not included in the Second Climate Solutions Plan. These include, for example, tracking energization timelines—as is increasingly being done across the country—and developing an End-to-End Process Improvement Plan, as National Grid has done in New York. Pepco’s recommendations in the Second Climate Solutions Plan should be paired with many others from the October workshop to tackle barriers to energization. The Commission should direct Pepco, OPC, and DCG to present joint recommendations for ways to streamline the service upgrade process for consideration in Formal Case 1130 or a new docket devoted to reducing energization barriers for customers.

DCG supports several of Pepco’s proposals related to new rate designs, which can lower barriers to clean energy technologies and produce benefits and savings for all residents by encouraging load shifting and steering new electric load (such as from EVs) to off-peak times. For more in-depth analysis and comments, DCG refers the Commission to the recent report of the Rate Design Working Group in

Formal Case 1176.<sup>11</sup> The Commission should ensure a suite of effective time-of-use rates exist to encourage load shifting and support new clean energy technologies by acting on Pepco and DCG's recommendations presented in Formal Case 1176.

DCG supports Pepco's proposals to support transportation electrification. As a recent letter from DOEE and the District Department of Transportation (DDOT) to the Commission highlighted, there are numerous actions that Pepco can take to support the continued deployment of electric vehicles in the District, in keeping with regulatory policies, like the Advanced Clean Cars II rule, that provide for increasing electrification of motor vehicles in the District.<sup>12</sup> The Commission should direct Pepco to file a proposed Phase II to its Transportation Electrification Program in Formal Case 1155 to support continued deployment of electric vehicles in the District. As part of that filing, the Commission should ensure that Pepco helps reduce barriers to EV deployment identified in DOEE and DDOT's letter, including ensuring the availability of EV submetering, reducing energization timelines, and providing support for managed EV charging and make-ready infrastructure.

DCG also urges the Commission to take action in Formal Case 1130 to enable the use of Green Button Connect My Data by authorized third parties to help customers and their partners take control of their energy usage and costs. As part of the PowerPath DC process, the Commission convened a Customer Impact Working Group to develop recommendations regarding how customers can authorize third party companies to access their energy usage data. This functionality is needed to support dynamic load management through technologies like smart thermostats. The working group issued several reports in 2022, as directed by the Commission.<sup>13</sup> The Commission has not, as far as DCG is aware, acted on the recommendations in these reports despite the substantial time and effort invested by the parties in

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<sup>11</sup> FC1176, Report of the District of Columbia Rate Design Working Group Regarding Proposed Time-of-Use Rates for Pepco Customers (January 30, 2026).

<sup>12</sup> FC1155, DOEE and DDOT Joint Letter to Chair Thompson and Commissioners Trabue and Beverly (filed Jan. 23, 2026).

<sup>13</sup> *E.g.*, Formal Case 1130, Customer Impact Working Group Green Button 150-Day Report in Response to Commission Order No. 21141 (Nov. 4, 2022).

developing their recommendations. DCG recommends the Commission take action on the recommendations outlined in those reports.

In addition, DCG recommends that Pepco conduct an appliance saturation survey among a representative sample of consumers in the District to better understand end-use energy consumption, energy demand, prevalence of technologies/appliances in the District's market, and future electric system needs. A number of other utilities and jurisdictions have undertaken such surveys.<sup>14</sup> The survey would provide more robust and granular data on the District's building stock than national surveys such as EIA's Residential Energy Consumption Survey (RECS) and Commercial Building Energy Consumption Survey (CBECS), help identify potential for new programs leveraging emerging technologies, and assist Pepco in a range of activities including distribution system planning, demand response, and rate design. The Commission should direct Pepco to work with OPC and DOEE, two parties that have expressed support for this initiative, to identify and scope an appliance saturation study as part of Formal Case 1130 or through the IDSP process currently under development.<sup>15</sup> DOEE is happy to provide examples of these surveys and assist Pepco in designing and administering the survey, leveraging existing data that DOEE collects through programs like BEPS.

Pepco's proposals relating to new peak-shaving tools, including managed EV charging and incentives for battery storage deployment, would be best addressed in a specific docket designated for the design and consideration of those tools (*e.g.*, Formal Case 1130 or Formal Case 1155 for managed EV charging). DOEE recently completed a study with Pacific Northwest National Laboratory that reviews the potential financial benefits to the District from peak shaving incentivized through bring-your-own-device

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<sup>14</sup> *E.g.*, Central Hudson Gas & Electric Corporation, Residential Appliance Saturation Survey Results (Dec. 6, 2018), available at: <https://documents.dps.ny.gov/public/Common/ViewDoc.aspx?DocRefId=%7B08245382-FBAD-4A2A-9621-46059F0387B5%7D>.

<sup>15</sup> FC 1167, OPC Comments in Response to Pepco's Proposed 15-Year Plan and Electrification Study, p.16 (recommending the use of appliance saturation studies to monitor progress in electrification and evaluate potential programs and investments in light of stronger District-specific evidence for electric and smart appliance deployment).

battery storage programs.<sup>16</sup> DCG, through DOEE, looks forward to working with Pepco, the Commission, and other stakeholders to advance the analysis and potential proposals for program designs in this area.

Moreover, several of the proposals in Pepco's Second Climate Solutions Plan involve energy efficiency and demand response. The Clean Energy DC Omnibus Amendment Act of 2018 requires Pepco to consult and coordinate with DOEE and the DC Sustainable Energy Utility (DCSEU) to avoid duplication of any programs that may be similar to the DCSEU's own offerings.<sup>17</sup> That consultation has not occurred with respect to these new proposals from Pepco, and therefore would need to occur prior to Pepco's submission of any actual proposals in Formal Case 1160 or any other docket.

Finally, DCG believes that any grid upgrades needed to support increased electrification should be identified and discussed in the IDSP process currently under development in Formal Case No. 1182. DOEE's thorough Grid Needs Assessment, conducted by Siemens in 2023 as part of the Strategic Electrification Roadmap, generally found ample capacity to accommodate increasing electrification for years to come.<sup>18</sup> To the extent there are any additional grid upgrades needed to support electrification, those should be identified and discussed in the upcoming IDSP process. That process provides opportunities to review and discuss Pepco's forecasting and grid needs in the context of Pepco's actual in-house forecasting and planning processes, rather than top-down modeling led by an outside organization like Brattle.

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<sup>16</sup>A copy of the study is available on DOEE's website at: <https://doee.dc.gov/node/1816676>.

<sup>17</sup> D.C. Code § 8-1774.07(g)(4): "As of October 1, 2019, the electric company or gas company, after consultation and coordination with the Department of Energy and the Environment and the District SEU and its advisory board, may apply to the Commission to offer energy efficiency and demand reduction programs in the District that the company can demonstrate are not substantially similar to programs offered or in development by the SEU, unless the SEU supports such programs."

<sup>18</sup> See Task 4, Grid Analysis, in DOEE, *The Strategic Electrification Roadmap for Buildings and Transportation in the District of Columbia* (April 2023), [https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page\\_content/attachments/Strategic%20Electrification%20Roadmap-reducedsize.pdf](https://doee.dc.gov/sites/default/files/dc/sites/ddoe/page_content/attachments/Strategic%20Electrification%20Roadmap-reducedsize.pdf).

### **III. CONCLUSION**

After eight years of spinning its wheels, the CBP process has failed to produce any tangible results. At the same time, the underlying challenges remain more pressing than ever. Rising energy prices require proactive initiatives to plan infrastructure smartly, increase grid flexibility, support local clean energy resources, and reduce barriers to building and vehicle electrification at lowest cost. These initiatives will not progress on their own and require proactive Commission direction. DCG recommends the Commission close out the eight-year experiment with the CBPs, pursue Commission-directed long-term planning on both the electric and gas sectors, and drive specific priority areas forward through deeper treatments in their relevant dockets, as the Commission has done recently with issues such as distributed energy resource interconnection.

## CERTIFICATE OF SERVICE

I certify that on March 2, 2026, a copy of the District of Columbia Government's comments on Potomac Electric Power Company's Second Climate Solutions Plan was electronically delivered to the following parties:

Jamond Perry, Esq.  
General Counsel  
Public Service Commission of the District of Columbia  
1325 G Street, NW, Suite 800  
Washington, D.C. 20005  
[jperry@psc.dc.gov](mailto:jperry@psc.dc.gov)

Katherine Wright Morrone, Esq.  
Venable LLP  
600 Massachusetts Avenue, NW  
Washington, D.C. 20001  
[KWmorrone@venable.com](mailto:KWmorrone@venable.com)

Erin Murphy, Esq.  
Environmental Defense Fund  
1875 Connecticut Ave. NW, Suite 600  
Washington, D.C. 20009  
[emurphy@edf.org](mailto:emurphy@edf.org)

Frann G. Francis, Esq.  
Apartment of Office Building Assoc.  
1025 Connecticut Ave. NW, Suite 1005  
Washington, D.C. 20036  
[ffrancis@aoba-metro.org](mailto:ffrancis@aoba-metro.org)

Eric J. Wallace, Esq.  
GreeneHurlocker, PLC  
4908 Monument Ave., Suite 200  
Richmond, VA 23230  
[ewallace@greenehurlocker.com](mailto:ewallace@greenehurlocker.com)

Kristi Singleton, Esq.  
Dennis Goines  
U.S. General Services Administration  
1800 F Street, NW #2016  
Washington, D.C. 20405  
[Kristi.singleton@gsa.gov](mailto:Kristi.singleton@gsa.gov)  
[dgoinspmg@verizon.net](mailto:dgoinspmg@verizon.net)

Dennis Jamouneau, Esq.  
Associate Counsel  
Potomac Electric Power Company  
701 Ninth Street, NW  
Washington, D.C. 20068  
[djamouneau@pepcoholdings.com](mailto:djamouneau@pepcoholdings.com)

Timothy Oberleiton, Esq.  
Earthjustice  
1625 Massachusetts Ave., NW  
Suite 702  
Washington, D.C. 20036  
[toberleiton@earthjustice.org](mailto:toberleiton@earthjustice.org)

John Dodge, Esq.  
Washington Gas Light Company  
1000 Maine Street, SW, Suite 700  
Washington, D.C. 20024  
[jdodge@washgas.com](mailto:jdodge@washgas.com)

Adam Carlesco, Esq.  
Office of the People's Counsel  
1133 15<sup>th</sup> Street, NW, Suite 500  
Washington, D.C. 20005  
[acarlesco@opc-dc.gov](mailto:acarlesco@opc-dc.gov)

Nina Dodge  
D.C. Climate Action  
6004 34<sup>th</sup> Place, NW  
Washington, D.C. 20015  
[ndodge432@gmail.com](mailto:ndodge432@gmail.com)

Barbara Mitchell, Esq.  
Assistant General Counsel  
District of Columbia Water & Sewer  
5000 Overlook Avenue, SW  
Washington, D.C. 20032  
[barbara.mitchell@dcwater.com](mailto:barbara.mitchell@dcwater.com)

Larry Martin  
GRID 2.0  
POB 14040  
Washington, D.C. 20044  
[lmartinc@gmail.com](mailto:lmartinc@gmail.com)

/s/ Lauren M. Marks  
Lauren M. Marks