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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

April 28, 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:

Enclosed, please find the Department of Energy and the Environment and Office of People's Counsel presentation on IDSP Framework. If you have any questions regarding this filing, please contact the undersigned.

Sincerely,

BRIAN L. SCHWALB
Attorney General

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cc: Service List

Integrated Distribution System Planning: DOEE-OPC Draft Framework & Comparison with Other States

DOEE

FC 1182 Working Group

April 2, 2026

Overview

- DOEE and OPC prepared a draft framework and detailed set of requirements for a new Integrated Distribution System Planning (IDSP) process in DC
  - The framework builds upon the PSC's Notice of Inquiry, national developments in distribution system planning, and significant local experiences with Pepco's existing plans and reports
  - The framework is a working draft meant to evolve in response to feedback from members of the IDSP Working Group
- This document provides more detail on the framework, with a focus on comparing its major elements to IDSP requirements in other states

IDSP Framework: Major Elements at a Glance

1. Definitions
2. Objectives & Metrics
3. Cycle & Frequency
4. Stakeholder Engagement
5. Commission Review
6. Baseline Information
7. Planning Horizons
8. Scenarios & Forecasting
9. Grid Needs Assessment
10. Solutions Identification
11. Customer Affordability
12. Annual IDSP Updates
13. Existing Reporting
14. Additional Elements

1. Definitions

Description: Definitions ensure common understandings of key terms

DOEE/OPC Draft Framework

- The framework begins with a set of definitions to clarify terms and introduce key concepts (e.g., Grid Needs, Solutions, and the Draft and Final IDSP)
- The definitions come from a combination of DC sources and models from FERC and other states
  - Footnotes and parenthetical red text provide sources for many of the definitions

Examples from Other States

- Colorado PUC, Distribution System Plan (DSP) Regulations, Section 3527 (Definitions)
- Illinois, Multi-Year Integrated Grid Plan Regulations, Section 475.20 (Definitions)

2. Objectives & Metrics

Description: IDSP requirements typically begin with "goals and objectives that define long-term, high-level outcomes for grid planning." LBNL 2024. Planning metrics are used to "assess performance, track progress, and/or measure success" of an IDSP. MD COMAR 20.50.15.02A(17).

DOEE/OPC Draft Framework

- Objectives are based on the Commission's NOI, PSC Mission Statement, and District Policy Goals (§2.a-c).
  - District Policy Goals is defined in §1.f and references PowerPath DC, major DC laws, while reinforcing the requirement for utility rates to remain just and reasonable.
- Appendix A is a placeholder for initial Planning Metrics to be developed by the working group
  - Note: There is an important difference between Planning Data and Planning Metrics. The former is a broader category that includes information relevant to IDSP; the latter are quantitative measurements of the success of the plan.

Examples from Other States

- MN IDP Requirements: Xcel Energy, Updated 6/3/25, Planning Objectives
- Ohio PUC, PowerForward Planning Objectives
- Illinois, Ameren, Integrated Grid Plan, Appendix H: Plan to Achieve Performance and Tracking Metrics
- Oregon, PGE 2024 Distribution System Plan, "Distribution System Vision" (p. 23)
- NY, ConEd, 2023 Distributed System Implementation Plan, "Progressing the DSP"

3. Cycle & Frequency

Description: IDSP requirements typically specify a cadence for developing and filing plans, as well as any requirements regarding updates between major plans. LBNL 2024.

DOEE/OPC Draft Framework

- Utilizes a three-year planning cycle, with annual updates in the years between major plan filings
  - See: §3 - Filing Frequency & §16 - Annual IDSP Update
- The framework aligns with Maryland's recently adopted structure for new electric system plans:
  - COMAR 20.50.15.04A: A complete electric system plan is required "at least once every 3 years" with an "annual electric system plan update during the years in which a complete . . . plan is not filed."

Examples from Other States

- States with DSP plans every 2 years:
  - Colorado, Connecticut, Minnesota, New York, Oregon
- States with DSP plans every 3-5 years:
  - Hawaii, Illinois, Massachusetts, Maine, Michigan, Nevada, Vermont
- States with annual update requirements:
  - California, Delaware, DC, Indiana, Maryland, Pennsylvania, Rhode Island, Maryland

Source: LBNL 2024

4. Community & Stakeholder Engagement

Description: Stakeholder engagement can "improve the quality of information the utility . . . and utility regulators consider," lead to "grid solutions that reflect diverse perspectives and priorities," and "foster greater coordination, transparency, and trust . . . resulting in better planning." LBNL Online Framework.

DOEE/OPC Draft Framework

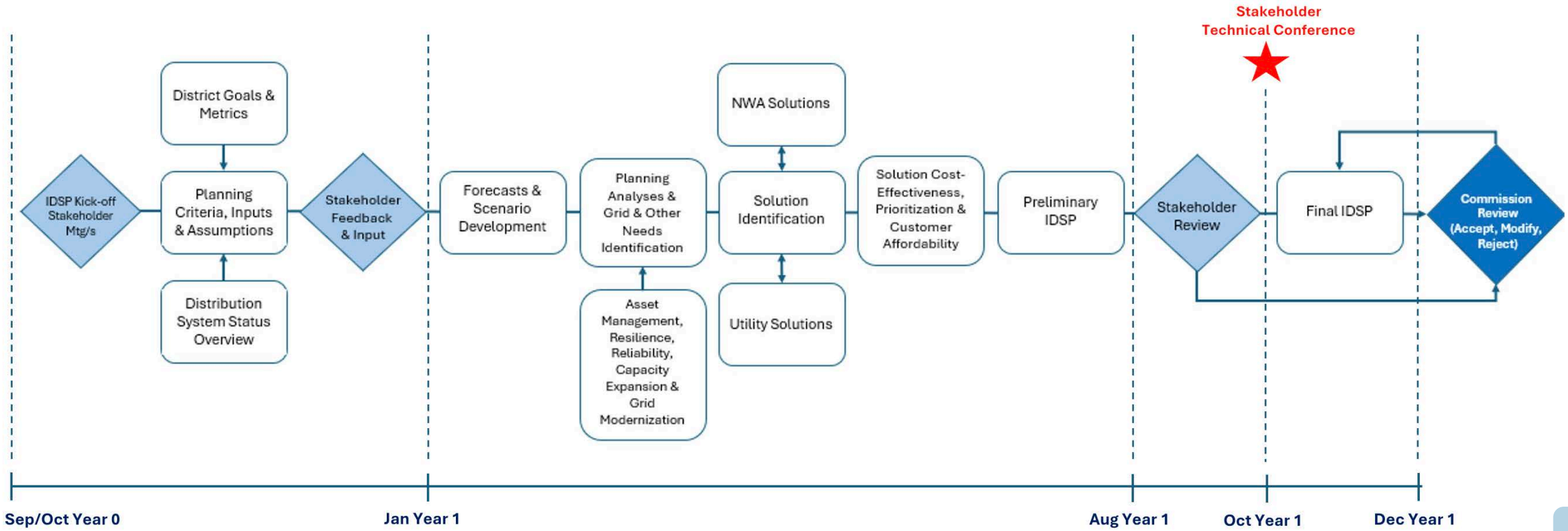
- Multiple opportunities for community and stakeholder input into assumptions, scenarios and draft plans (§4)
- Requirements to hold a subset of meetings outside normal business hours to promote broader engagement (§4.a.ii), and provide Planning Criteria and Planning Data in easily accessible formats (§4.b.iii-iv)
- Documentation of recommendations and explanations of which were included, which were not, and why (§4.b.v)
- Annual Technical Conference to present on the Draft IDSP or Annual IDSP Update, and a standing working group for deeper examination of key issues (priority feeders, forecasting, etc.)

Examples from Other States

- Hawaiian Electric, Integrated Grid Planning, Stakeholder Council
- Michigan, DTE, 2023 Distribution Grid Plan, Section 17: Stakeholder Engagement
- New York, National Grid, 2023 Distributed System Implementation Plan Update, Stakeholder Interface sections by topic
- Illinois, Ameren, 2026 Integrated Grid Plan, "Stakeholder Engagement" (p. 22)
- Oregon, PacifiCorp, 2022 Distribution System Plan Part 2, Community Outreach (p. 139)

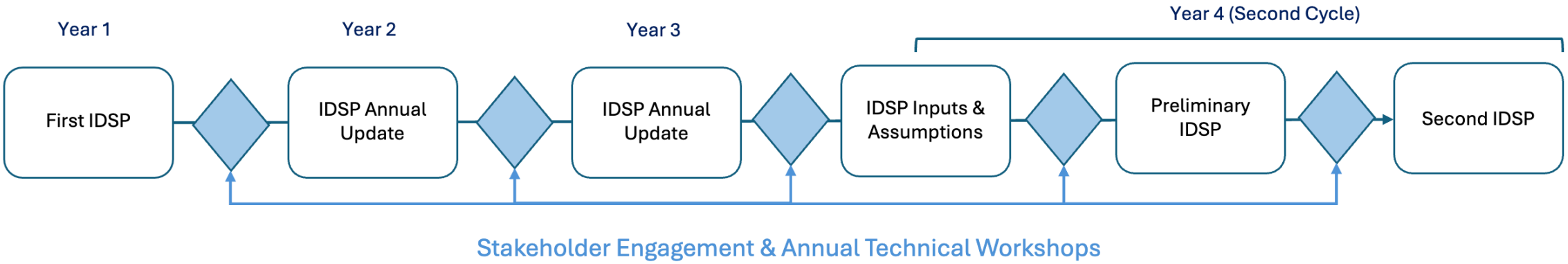
4. Community & Stakeholder Engagement

- Light blue diamonds below represent opportunities for stakeholder engagement in the framework
- Comments can also be filed on the Final IDSP for consideration by the Commission, including for any modifications the Commission may order for subsequent IDSPs



4. Community & Stakeholder Engagement

- Stakeholder engagement continues in off-years through annual technical workshops, where the utility presents on the IDSP Annual Update



5. Commission Review

Description: While roles vary by state, public utility commissions can "[e]stablish requirements, conduct technical conferences, and review and approve plans." LBNL 2024.

DOEE/OPC Draft Framework

- Commission will "review the Final IDSP, Annual IDSP Updates, and party comments, and may accept, accept subject to modifications, or reject the IDSP filing." (§3.a.v)
  - Acceptance means the "Commission agrees that the Utility's filing included all reporting requirements." (§3.a.v)
  - Acceptance does not mean that the expenditures proposed in the plan are prudent. Prudency of specific investments must be determined in a subsequent rate case.
- In subsequent rate cases, the Utility must "reconcile differences in rate case filings and other filings proposing capital investments with the IDSP and . . . provide explanations for deviations from the IDSP." (§14.c)

Examples from Other States

- MN IDP Requirements for Xcel (6/3/25):
  - "Commission review of distribution system plans is not meant to preclude flexibility for Xcel to respond to dynamic changes and on-going necessary system improvements to the distribution system; nor is it a prudency determination of any proposed system modifications or investments."
- Maine PUC, Dkt. 2022-00322, Order (7/12/24):
  - "The appropriate time to evaluate the costs of investments associated with the grid plans is when those costs are known and a utility seeks to recover those costs in either distribution or transmission rates."

6. Baseline Information

Description: "Baseline information is foundational data about the utility's existing distribution system — physical, financial, and operational — that provides a basis for planning." LBNL 2024.

DOEE/OPC Draft Framework

- Includes current and recent historical information that provides the basis of Pepco's planning (§6.i)
- Specifies key baseline information throughout, e.g. amount of interconnected DER, energy efficiency, demand response, historic reliability and resiliency information, capital and O&M spending (e.g., §§6-8)
- Draws on existing ACR and DC priorities (e.g., §6.iii - Status of 4kV Long Range Study)
- Appendix B provides a placeholder for working group members to identify additional information

Examples from Other States

- MN PUC, Updated Filing Requirements (6/3/25), Subsection A. Baseline Distribution System
- Colorado PUC Decision C21-0665 (2021), Attachment B, including § 3529 (plan contents) and §3531 (existing distribution system). Example Plan: Xcel DSP (Dec. 2024)
- Massachusetts, National Grid, 2024 Electric Sector Modernization Plan, "Current State of The Distribution System" (p. 59)
- Michigan, Consumers Energy, 2023 Electric Distribution Infrastructure Investment Plan, "Distribution System Overview" (p. 11)

7. Planning Horizons

Description: Planning horizons define the periods of study. IDSPs typically contain both and short-term plans. "Long-term plans establish the utility's strategy, including a roadmap of capital and maintenance expenditures . . . Near-term plans identify with greater specificity the proposed expenditures to address more immediate grid needs." LBNL 2024

DOEE/OPC Draft Framework

- Uses three planning horizons grounded in short- (1-3 years), medium- (4-6 years), and long-term needs (7-10 years) (§5.b)
  - Mirrors the planning horizons in Maryland's DSP
- Three-part structure allows for more certainty and detailed information in short-term planning, while providing an extended outlook up to 10 years

Examples from Other States

- CA distribution system plans (DSP): 10-13 years
- Colorado DSP: 10 year planning horizon; 5 year action plan
- MA grid mod plans: 5 years, 10 years, and out to 2050
- Source: LBNL, State Distribution Planning Requirements (2025 Update)

8. Scenarios & Forecasting

Description: Scenario planning is a "strategic approach for making business decisions where a variety of possible or probable futures and their likely impacts are considered." EPRI 2024. Scenario planning is used by many businesses, but historically "has not been heavily leveraged in the development of distribution system plans." Id.

DOEE/OPC Draft Framework

- Incorporates scenario planning using a base case and a high and low bookend scenarios (§8.c)
- Methodology for DER and load forecasting described, and forecasts broken out by relevant DER type (§8.a)
- Impacts of new business, electrification, building codes and BEPS, and other factors incorporated in forecasts (§8.b)
- Transmission forecasts from PJM referenced and compared to distribution-level forecasts, with explanations for any differences (§8.b.vi)

Examples from Other States

- California, SoCal Edison, Amended 2024 Grid Needs Assessment, using scenarios and forecasting from the California Energy Commission's Integrated Energy Policy Report (IEPR)
- Massachusetts, Eversource, 2024 Electric Sector Modernization Plan, "2035 - 2050 Policy Drivers: Electric Demand Assessment" (p. 472)
- Oregon, PGE, 2024 Distribution System Plan, "DER Forecasting" (p.40)
- Minnesota, Xcel Energy, 2024 Integrated Distribution Plan, "DER Snapshot and Forecasts" (p. 29)

8. Scenarios & Forecasting

Hawaii: HECO's interactive scenario dashboard provides a great example. It allows users to toggle through the Moderate, Low, and High Scenarios, download data for each island, and review forecast assumptions.

9. Grid Needs Assessment

Description: The grid needs assessment identifies and documents specific grid deficiencies, and serves as the starting point for developing solutions. LBNL 2024.

DOEE/OPC Draft Framework

- The utility conducts a grid needs assessment that identifies substation/feeder constraints, aging assets, reliability and resilience vulnerabilities, and grid modernization requirements (§10)
- Framework includes provisions related to planning granularity (§9) and planning criteria (e.g. §4.b.ii) to ensure Commission and stakeholders understand drivers for grid needs

Examples from Other States

- MD DSP, COMAR 20.50.15.03G, Grid Needs and Locational Value Assessment
- Ameren (IL), Integrated Grid Plan (p. 178)
- CO PUC, DSP Regulations, Section 3532 (Grid Needs Assessment)
- Hawaii, HECO, 2023 Integrated Grid Plan, Overview of Grid Needs (p. 115)
- Michigan, DTE, 2023 Distribution Grid Plan, "Gaps to Future State" (p. 47)

10. Solutions Identification

Description: After determining grid needs, the utility identifies and evaluates potential solutions. U.S. DOE, Modern Distribution Grid Guidebook (2020).

DOEE/OPC Draft Framework

- Utility identifies potential solutions to grid needs, including Traditional Wires Solutions and Non-Wires Alternatives (§13)
- Utility provides (where feasible) a locational value for each grid need that includes the value of deferred or avoided Traditional Wires Solutions (§11)
- Utility presents rationale, criteria, and supporting benefit-cost analyses (BCAs) for selected solutions (§13.a.vi)

Examples from Other States

- CO PUC, DSP Regulations, Section 3534, NWA Suitability Screening
- MD PSC, DSP Regulations, COMAR 20.50.15.03G-J
  - Solutions identification, locational value, screening & evaluation, rationale for selections
- Oregon, PGE, 2024 Distribution System Plan, "Virtual Power Plant" (p. 64) & "Traditional infrastructure needs and solutions" (p. 105)
- Oregon, PacifiCorp, 2022 Distribution System Plan, "Identification of Solutions" (p. 86)

11. Customer Affordability

Description: "Customer affordability is the global objective that sets the financial constraint for optimizing expenditures to achieve the other planning objectives." LBNL (Jan. 2025).

DOEE/OPC Draft Framework

- Framework as a whole intended to safeguard affordability (e.g., through improved forecasting, increased stakeholder input, consideration of varied potential solutions)
- Additional provisions to enhance affordability include:
  - Cost-effectiveness screening (§14.a.)
  - Prioritization for proposed expenditures (§14.a)
  - Justification for chosen solutions (§13.vi)
  - Ratepayer impacts by customer class and Ward (§14.b)
  - Explanations of any deviation from IDSP in rate cases (§14.c)

Examples from Other States

- Ameren (Illinois), Integrated Grid Plan, Section 17: Affordability Analysis
- MD PSC, DSP Regulations, COMAR 20.50.15.03L
  - Explanations for divergences in rate cases
- Michigan, DTE, 2023 Distribution Grid Plan, "Work Prioritization" (p. 164)
- RI, Rhode Island Energy, 2022 Grid Modernization Plan, "BCA Evaluation under Docket No. 4600" (p.170)

12. Annual IDSP Updates

Description: "States that require less frequent [IDSPs] may require utilities to submit an annual update or report on a specific portion of the filing." LBNL 2024.

DOEE/OPC Draft Framework

- The framework includes an Annual IDSP Update, for years in which Pepco does not file a Draft or Final IDSP (§16).
- The Annual IDSP Update includes information on, for example, new customer, market, or policy conditions, updates to Grid Needs and Priority Feeders, and changes to projects, programs, and capital spending
- It aligns in structure with the new process in Maryland

Examples from Other States

- MD DSP Regulations, COMAR 20.50.15.03G(1)(b)
  - "(b) The annual electric system plan update shall discuss changes to an electric company's grid needs assessment that may occur between planning cycles."
- MA DPU, Memo on Electric Sector Modernization Plan Biannual Reports, Metrics and Reporting Requirements (Sept. 9, 2025)
  - Summarizes requirements for biannual updates to 5-year Electric Sector Modernization Plans
- LBNL (2024) summarizes many more examples of annual or biannual updates (p. 19)

13. Relationship with Existing Plans & Reporting

Description: Understanding the relationship between the new IDSP process and preexisting plans and reporting is one key area for the working group.

DOEE/OPC Draft Framework

- In the comments on the NOI, Pepco expressed interest in consolidating existing reports (e.g. ACR) with the new IDSP
- Any proposed consolidation should be approach with utmost care to ensure important information continues to be reported
- The Summary of Pepco Distribution System Reporting Excel spreadsheet may be useful for understanding whether and how to consolidate the IDSP with existing reporting

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	Long-Range Plan
	Number of demand response customers	Utility territory, substation, feeder	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	Annual Consolidated Report - Comprehensive Plan
	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
	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
Asset Management Strategy	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	Utility territory	Annual Consolidated Report - Productivity Improvement Plan
	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

14. Additional Elements

Description: The framework includes a variety of additional provisions aimed at ensuring an effective IDSP process. The items below provide a few more examples of these kinds of provisions.

DOEE/OPC Draft Framework

- **Website:** The framework provides that the utility should publish the IDSP and Annual IDSP Updates on its website (§16.iii)
  - Additional website functionality could be discussed during Phase I or Phase II of the working group
- **BCAs:** Rigorous Benefit-Cost Analyses (BCA) can support effective grid planning and are featured in the draft framework (§11.c, §14.a.i)
- **Review & learning across IDSPs**: The utility will assess results and determine lessons learned and changes to future planning assumptions as needed (§16.a.i.6).

Examples from Other States

- CO PUC, DSP Regulations, Section 3541 (Web Portal)
- Hawaiian Electric Dashboard
- Illinois, Ameren, 2026 Integrated Grid Plan, Customer and System Data Management (p. 105)

Next Steps

- The framework is intended to be a living document that will evolve over the course of the working group in response to new ideas, feedback and questions
- Parties – including Grid 2.0 and OPC-DOEE through the Roadmap – have already circulated additional ideas that should be reviewed and incorporated, as appropriate, in the framework
- We welcome additional comments and questions on the framework, which we can incorporate in a revised version

Questions or Comments?

Contact: Peter Damrosch
Policy Advisor, DOEE
peter.damrosch@dc.gov

REFERENCES & RESOURCES

References

- DOEE & OPC Proposed Framework: Version 2.6 (January 27, 2026)
  - Available in PDF on the FC1182 docket and in native Word/Excel format (on Box or by email: Peter.Damrosch@dc.gov)
- General resources on IDSP in other states:
  - LBNL (Dec. 2024). State requirements for electric distribution system planning: https://emp.lbl.gov/publications/state-requirements-electric
  - LBNL (2025 update). Online catalogue and summaries of state distribution plans: https://emp.lbl.gov/state-distribution-planning-requirements
    - Summary table: https://docs.google.com/spreadsheets/d/1URblaRocEaiKycg2umEYefjL2tZthxia/edit?gid=675616756#gid=675616756
    - Summaries of state plans: https://drive.google.com/drive/folders/1AQJCVaQCSqZokJ7YGjByUKIhWbsWkRxa
    - Document library: https://drive.google.com/drive/folders/1hCSgOwEvVckTYcvzvXb96xKALvKx_7Md

Example Orders & Regulations from Other States

- Colorado PUC, Distribution System Planning Regulations, Sections 3525: https://www.sos.state.co.us/CCR/GenerateRulePdf.do?ruleVersionId=12151
- Illinois Commerce Commission, Multi-Year Integrated Grid Plan Regulations: https://icc.illinois.gov/docket/P2021-0828/documents/318226/files/553938.pdf
- Maryland ESP Regulations (Nov. 2025): https://regs.maryland.gov/us/md/exec/comar/20.50.15
- MA DPU, Memo on Electric Sector Modernization Plan Biannual Reports, Metrics and Reporting Requirements (Sept. 9, 2025)
- Minnesota PUC, Updated Filing Requirements for Xcel's IDP (6/3/25): https://efiling.web.commerce.state.mn.us/documents/%7B00F93597-0000-C835-95EE-FA9642F03C88%7D/download?contentSequence=0&rowIndex=51

Example Plans from Other Utilities

- Colorado, 2024 Xcel Distribution System Plan
- Hawaii, HECO, 2023 Integrated Grid Plan
- Illinois, Ameren, 2026 Integrated Grid Plan
- Massachusetts, National Grid, 2024 Electric Sector Modernization Plan
- Michigan, Consumers Energy, 2023 Electric Distribution Infrastructure Investment Plan
- Michigan, DTE, 2023 Distribution Grid Plan
- New York, Con Ed, 2023 Distributed System Implementation Plan
- New York, National Grid, 2023 Distributed System Implementation Plan Update
- Oregon, PGE 2024 Distribution System Plan
- Rhode Island, Rhode Island Energy, 2022 Grid Modernization Plan

CERTIFICATE OF SERVICE

I hereby certify that on this 28th day of April 2026, I caused true and correct copies of the Department of Energy and the Environment and Office of People's Counsel Presentation on IDSP Framework to be electronically delivered to the following:

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