

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET, N.W., SUITE 800
WASHINGTON, D.C. 20005**

ORDER

July 29, 2026

**FORMAL CASE NO. 1182, IN THE MATTER OF THE INVESTIGATION INTO THE
IMPLEMENTATION OF INTEGRATED DISTRIBUTION SYSTEM PLANNING FOR
ELECTRIC UTILITIES, Order No. 23133**

I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) denies the Office of the People’s Counsel for the District of Columbia’s (“OPC”) Motion requesting that the Commission direct the Potomac Electric Power Company (“Pepco”) to file a proposed Integrated Distribution System Planning (“IDSP”) and Updated Planning Criteria Framework, and grants in part and denies in part the District of Columbia Climate Action’s (“DCCA”) Motion concerning the IDSP Working Group process.¹ The Commission directs the Integrated Distribution System Planning Working Group (“IDSP WG”) to continue Phase 1 Framework Development using the working draft framework and extends the Phase 1 Report deadline from August 10, 2026, to February 10, 2027, subject to the additional procedures and deadlines established by this Order.

II. BACKGROUND

2. The Commission issued a Notice of Inquiry (“NOI”) on November 27, 2024, creating a new case for IDSP, *Formal Case No. 1182*.² The NOI invited interested persons to comment on various matters related to electric utility distribution system planning, IDSP, and the appended Commission-created strawman proposal. Initial comments were filed by OPC,³ the Department of Energy and Environment (“DOEE”),⁴ GRID2.0 Working Group (“GRID2.0”),⁵

¹ Commissioner Richard Beverly concurs in part to this Order. *See* Attachment A.

² *Formal Case No. 1182, In the Matter of the Investigation into the Implementation of Integrated Distribution System Planning for Electric Utilities (“Formal Case No. 1182”)*, Notice of Inquiry, rel. November 27, 2024.

³ *Formal Case No. 1182*, OPC Comments, filed March 17, 2025 (“OPC Comments”).

⁴ *Formal Case No. 1182*, DOEE Comments with Synapse Memorandum, filed March 17, 2025.

⁵ *Formal Case No. 1182*, GRID2.0 Working Group Initial Comments, filed March 17, 2025.

and Pepco.⁶ Reply comments were filed by DOEE,⁷ GRID2.0,⁸ and Pepco.⁹ Community comments were also filed.¹⁰

3. On July 16, 2025, the Commission issued Order No. 22464, which directed, among other things, that: (1) an IDSP WG be convened within ninety (90) days of the Order; and (2) the IDSP WG conclude the process and submit the working group report, including a proposed IDSP framework, consensus recommendations, non-consensus recommendations, requests for clarification, and a clean and redline copy of the revised Strawman Proposal with edits or amendments, within 270 days of the date of the first IDSP WG meeting.¹¹

4. On October 14, 2025, Order No. 22723 was issued, granting a 120-day extension of time to convene the first IDSP WG.¹² Order No. 22723 further required that the IDSP WG Report be filed 180 days after the first working group meeting, with the thirty (30) days for interested non-party comments to be filed, and six (6) months for the Commission to issue an Order directive remaining in effect.¹³

5. In the first IDSP WG held on February 11, 2026, Consultant E3 outlined the goals of the IDSP WG in a three-phase approach:

Phase 1: Framework Development (ending August 2026);

Phase 2: Clarification (Fall 2026-Spring 2027); and

Phase 3: Evaluation of Pepco's filed IDSP (Fall 2027-Spring 2028).¹⁴

⁶ *Formal Case No. 1182*, Comments of Potomac Electric Power Company to Notice of Inquiry on Integrated Distribution Planning, filed March 17, 2025.

⁷ *Formal Case No. 1182*, DOEE Reply Comments, filed April 14, 2025.

⁸ *Formal Case No. 1182*, GRID2.0 Reply Comments, filed April 14, 2025.

⁹ *Formal Case No. 1182*, Reply Comments of Potomac Electric Power Company to Notice of Inquiry on Integrated Distribution Planning, filed April 14, 2025.

¹⁰ *Formal Case No. 1182*, Comments to the Commission filed individually by Don Bronkema, Rachael Gorlin, Leonard Rubin, John Curtis, Lino Martinez, Paula Hirschhoff, Jason Miller, Elia Garcia McComie, Sydney Bronaugh, Kristen Hengtgen, Michael Cleary, Karl Fellenius, Deirdre Joy, John Wiggins, Cara Fultons, Vincent Lampones, Bridget Donovan, Mustafa Abdullah, Claire Mills, James Driver, Anne Debuys, and Claire Hackers, Suzanne DeFelice, Ayla Frost, Gawain Kripke, Linda VerNooy, Morgan Corey, Philip Downey, Diana Schoder, Shayna Gleason, and Evan Kenyon filed between April 9 and May 9, 2025 ("Interested Resident's Comments").

¹¹ *Formal Case No. 1182*, Order No. 22464, ¶ 63(5), rel. July 16, 2025.

¹² *Formal Case No. 1182*, Order No. 22723, rel. October 14, 2025 ("Order No. 22723").

¹³ *Formal Case No. 1182*, Order No. 22723, ¶ 1.

¹⁴ *Formal Case No. 1182*, Integrated Distribution System Planning Working Group's Revised February 11, 2026, Meeting Minutes, filed February 27, 2026 ("First IDSP WG Meeting Minutes").

This first IDSP WG session also focused on Phase 1 Topic 2: supporting a transparent and data-driven IDSP; national IDSP trends; DOEE and OPC's proposed data reporting framework; and Grid 2.0's proposed IDSP framework.¹⁵

6. The second IDSP WG was held on April 8, 2026, and focused on: aligning working group objectives, deliverables, and overall schedule and process for the remaining working group session; an overview of proposed IDSP technical framework elements and discussion of impacts on Pepco's existing reporting and reporting on load forecasting and capacity planning; a presentation of current and evolving load forecasting practices by Pepco; and a presentation on advanced, scenario-based load forecasting principles by Consultant E3.¹⁶

7. The third IDSP WG was held on May 5, 2026, and focused on: reviewing, discussing, and aligning in the Working Group Roadmap; discussing IDSP objectives and definitions for the proposed IDSP Working Group Framework; a presentation on non-wires alternatives ("NWA's") considerations by Consultant E3; a presentation on expanding DER valuation and hosting capacity transparency by Consultant E3; and a presentation on an overview of the DC Benefit-Cost Analysis model by Consultant Energy Shrink.¹⁷

8. On May 20, 2026, OPC filed a Motion requesting that the Commission direct Pepco to file a proposed IDSP and Updated Planning Criteria Framework for collaborative stakeholder review and input, and revise the IDSP WG schedule accordingly.¹⁸ On June 1, 2026, Pepco filed a response requesting that OPC's Motion be denied.¹⁹

9. On June 9, 2026, DCCA filed a Motion requesting that the Commission: (1) suspend the IDSP WG; (2) direct Commission Staff and the consultants to prepare a revised draft framework that would incorporate the Commission's November 2024 Strawman Proposal for the IDSP WG's consideration; and (3) grant a six-month extension of Phase 1 Framework Development.²⁰

10. In light of these Motions, Commission Staff convened an additional IDSP WG

¹⁵ *Formal Case No. 1182*, First IDSP WG Meeting Minutes.

¹⁶ *Formal Case No. 1182*, Integrated Distribution System Planning Working Group's Revised April 8, 2026, Meeting Minutes, filed April 22, 2026 ("Second IDSP WG Meeting Minutes").

¹⁷ *Formal Case No. 1182*, Integrated Distribution System Planning Working Group's Revised May 5, 2026, Meeting Minutes, filed May 21, 2026 ("Third IDSP WG Meeting Minutes").

¹⁸ *Formal Case No. 1182*, The Office of the People's Counsel for the District of Columbia's Motion Requesting the Commission Direct Pepco to Promptly File a Proposed IDSP and Updated Planning Criteria Framework for Stakeholder Review and Input, filed May 20, 2026 ("OPC Motion").

¹⁹ *Formal Case No. 1182*, Response of the Potomac Electric Power Company, filed June 1, 2026 ("Pepco Reply").

²⁰ *Formal Case No. 1182*, DC Climate Action Motion Requesting the Commission to Modify Its Process for Developing the District's First Integrated Distribution System Planning (IDSP), Adding a Phase and Temporarily Suspending the IDSP Working Group Until the Completion of the New Phase, filed June 9, 2026 ("DCCA Motion").

session on June 23, 2026, to discuss Stakeholder positions and potential next steps. Staff requested that Stakeholders file recommendations identifying their preferred path forward by July 10, 2026. Pepco,²¹ DOEE,²² DCCA,²³ and GRID2.0 filed recommendations.²⁴

III. DISCUSSION

A. **Motions**

11. **OPC.** OPC requests that the Commission direct Pepco to promptly file a proposed IDSP and Updated Planning Criteria Framework (“IDSP & Framework”) for collaborative stakeholder review and input, and that the Commission revise the working group’s schedule accordingly.²⁵ OPC argues that approving its motion will ensure that the IDSP is not based on antiquated system planning criteria, applied to Pepco’s capital budget categories, and aligns with the District’s energy goals.²⁶

12. OPC states that despite the working group having three of five sessions, Pepco has failed to file a proposed IDSP & Framework.²⁷ OPC points out that some stakeholders have developed a framework summarizing national best practices for the IDSP WG to review, but that this alone is insufficient because it lacks insight into Pepco’s infrastructure’s characteristics, limitations, and growth expectations.²⁸ OPC states that to date, Pepco has not proposed any needs and objectives, updated distribution planning criteria, or an action plan for planning horizons that should inform the framework to be submitted to the Commission.²⁹ OPC argues that Pepco’s own comments emphasize the need for Pepco to provide the necessary information to develop the IDSP framework.³⁰ OPC also argues that Pepco retains the burden of demonstrating the prudence of its

²¹ *Formal Case No. 1182*, The Potomac Electric Power Company’s Comments on Next Steps for the Integrated Distribution Planning Working Group, filed July 10, 2026 (“Pepco Recommendations”).

²² *Formal Case No. 1182*, The Department of Energy and Environment’s Comments and Recommendations on the IDSP Working Group, filed July 10, 2026 (“DOEE Recommendations”).

²³ *Formal Case No. 1182*, DC Climate Action Comments Regarding the IDSP Working Group, filed July 10, 2026 (“DCCA Recommendations”).

²⁴ *Formal Case No. 1182*, GRID2.0’s Comments and Recommendations on the IDSP Working Group, filed July 10, 2026 (“GRID2.0 Recommendations”).

²⁵ OPC Motion at 1.

²⁶ OPC Motion at 1.

²⁷ OPC Motion at 2.

²⁸ OPC Motion at 2-3.

²⁹ OPC Motion at 3.

³⁰ OPC Motion at 3.

incurred costs, requiring its input into the framework.³¹

13. OPC argues that for the IDSP process to yield meaningful and actionable outcomes, Pepco must update its existing distribution planning criteria,³² claiming that Pepco's current planning criteria are rooted in legacy utility planning methodologies.³³ OPC argues that Pepco needs to update its planning criteria to promote the forward-looking goals of IDSP, and that failing to do so will inherently favor conventional, capital-intensive infrastructure solutions.³⁴ OPC states that Pepco's current planning criteria treat NWAs as an afterthought, potentially leading to NWAs being overlooked in favor of traditional upgrades.³⁵ OPC argues that without updated planning criteria, IDSP risks becoming a procedural overlay on outdated practices rather than a transformative planning tool.³⁶

14. OPC argues that IDSP and planning criteria should apply to Pepco's budget capital strategy.³⁷ OPC contends that, prior to 2023, Pepco's load forecasts were inflated by as much as 20% to 30%, indicating that Pepco designed the distribution system for higher peaks that have not been approached or exceeded.³⁸ OPC states that similarly, the 2025 forecasted loads are generally well below the 2021 and 2022 forecasts, resulting in very little need for capacity increases through transitional or NWA solutions.³⁹ OPC points to Pepco's long-term budgets as filed in the Company's 2026 Annual Consolidated Report ("ACR"), which show that capacity increases in 2028 and 2029 account for only 2% of the capital budget, and notes that Pepco has stated that IDSP should not apply to projects outside of capacity increases.⁴⁰ OPC argues that Pepco's suggestions will result in an IDSP that applies to only a very limited portion of its capital expenses and will eliminate the transparency in system planning and capital expenditure contemplated by the IDSP process.⁴¹

15. **Pepco Reply.** Pepco argues that OPC's Motion should be dismissed because it undercuts the Working Group's progress and does not accurately represent Pepco's engagement

³¹ OPC Motion at 3-4.

³² OPC Motion at 4.

³³ OPC Motion at 4.

³⁴ OPC Motion at 4.

³⁵ OPC Motion at 4-5.

³⁶ OPC Motion at 5.

³⁷ OPC Motion at 5.

³⁸ OPC Motion at 5.

³⁹ OPC Motion at 5.

⁴⁰ OPC Motion at 5-6.

⁴¹ OPC Motion at 7.

to date.⁴² Pepco states that it agrees with the intent of the IDSP process to achieve the Commission's goals as stated in the NOI.⁴³ Pepco highlights that, through its Maryland affiliates, it has collaborated with stakeholders for several years to develop a process similar to the one underway with the Commission here in the District.⁴⁴ Pepco states that it will file annual reports in compliance with COMAR 20.50.15, which was recently adopted by the Maryland Public Service Commission.⁴⁵

16. Pepco argues that it has fully engaged with the IDSP WG, having devoted significant resources, contributed to the discussions, and provided comments on documents like the framework put forward by OPC and DOEE.⁴⁶ Pepco states that it has even agreed to leverage the proposed IDSP framework put forward by DOEE and OPC.⁴⁷

17. Pepco notes that Order No. 22723 sets forth a process, which will result in a working group report for the Commission to consider.⁴⁸ Pepco notes that the process is ongoing and that the IDSP Framework put forward by OPC and DOEE has been discussed, and Pepco has agreed that the draft framework is a reasonable starting point.⁴⁹ Pepco argues that granting OPC's Motion would circumvent the working group process established by the Commission.⁵⁰

18. Pepco also argues that OPC's Motion is based on an unsupported view of the law and erroneous facts and assumptions.⁵¹ Pepco argues that OPC's claims that it has failed to file a proposed IDSP & Framework are unsubstantiated and that Pepco has not failed to do anything required by Commission order in *Formal Case No. 1182* or by the law.⁵² Pepco argues that OPC's Motion does not and cannot point to any obligation to make the filing now requested by OPC.⁵³

19. Pepco argues that OPC's claim that Pepco has failed to substantively engage in

⁴² Pepco Reply at 2.

⁴³ Pepco Reply at 2.

⁴⁴ Pepco Reply at 2.

⁴⁵ Pepco Reply at 2.

⁴⁶ Pepco Reply at 2.

⁴⁷ Pepco Reply at 2.

⁴⁸ Pepco Reply at 3.

⁴⁹ Pepco Reply at 3.

⁵⁰ Pepco Reply at 3.

⁵¹ Pepco Reply at 3.

⁵² Pepco Reply at 3.

⁵³ Pepco Reply at 3.

the working group is false.⁵⁴ Pepco argues that the filed minutes for the first three (3) working group meetings demonstrate Pepco's engagement in the process, including its providing of presentations at the request of working group members.⁵⁵ Pepco states that it has provided presentations and written comments at the meeting and in other materials that detail how it plans to evolve its process to help achieve the Commission's stated IDSP goals.⁵⁶ Pepco also states that it has voiced agreement with many of DOEE and OPC's proposed new data reporting requirements and changes to Pepco's processes.⁵⁷

20. Pepco argues that OPC's request for additional information from Pepco regarding needs and objectives, updated distribution planning criteria, or an action plan for planning horizons requires a more detailed proposed requirement.⁵⁸ Pepco argues that the working group is the appropriate forum for discussing a more granular, detailed proposed requirements.⁵⁹ Pepco states that it has commented on and requested comments and clarification from the working group on the proposed DOEE/OPC framework.⁶⁰ Pepco plans to continue discussing these issues in the remaining working group meetings while acknowledging that two more sessions likely will not be enough time to reach consensus on all the areas of discussion.⁶¹ Pepco proposes continuing the conversation to reach a consensus on developing more specific proposed IDSP requirements.⁶²

21. **DCCA.** DCCA asks the Commission to modify the process established in Order No. 22464 for developing the District's first IDSP framework. Specifically, DCCA requests that the Commission add a new framework-development stage and temporarily suspend the existing IDSP Working Group while Commission Staff and the Consultants prepare a revised draft framework that subsumes the Commission's November 2024 Strawman Proposal.⁶³

22. DCCA explains that Order No. 22464 directed the IDSP WG to submit a report containing a proposed IDSP framework, consensus and non-consensus recommendations, requests for clarification, and clean and redlined revisions to the Commission's November 2024 Strawman Proposal. DCCA also notes that Order No. 22464 identifies four principal topic areas and fifteen subtopics for Stakeholder consideration and directs the Working Group to address

⁵⁴ Pepco Reply at 4.

⁵⁵ Pepco Reply at 4.

⁵⁶ Pepco Reply at 4.

⁵⁷ Pepco Reply at 4.

⁵⁸ Pepco Reply at 5.

⁵⁹ Pepco Reply at 5.

⁶⁰ Pepco Reply at 5.

⁶¹ Pepco Reply at 5.

⁶² Pepco Reply at 5.

⁶³ DCCA Motion at 1.

issues raised in prior Stakeholder comments.⁶⁴

23. According to DCCA, the IDSP WG was approaching the fifth and final planned meeting but had not sufficiently addressed many of the required subtopics. DCCA contends that neither the IDSP framework nor the other required components of the Working Group report were close to completion, even though the report deadline was approaching.⁶⁵ Although stakeholders had exchanged substantial information and reached agreement on certain framework provisions, DCCA maintains that significant portions of the framework still required revision, unresolved differences had not been adequately explored, and important gaps remained.

24. DCCA further argues that five meetings did not provide sufficient time for stakeholders to discuss contested provisions, identify areas of agreement or disagreement, and develop clear and specific requirements that Pepco could use in preparing its first IDSP. DCCA notes that comparable IDSP framework-development processes in other jurisdictions have taken years and asserts that the deficiencies in the current process could not be resolved merely by adding a small number of sessions to the existing compressed schedule.⁶⁶

25. To address these concerns, DCCA proposes that Commission Staff and the Consultants prepare a new draft framework that would replace and incorporate the Commission's 2024 Strawman Proposal. The revised draft would: (1) include IDSP objectives and guiding principles; (2) incorporate changes already agreed upon by stakeholders; (3) identify disputed provisions and known gaps; (4) flag issues on which stakeholder positions remain unclear; and (5) identify topics and subtopics from Order No. 22464 that have not yet been addressed.⁶⁷

26. DCCA asks that the IDSP WG be suspended while Staff and the Consultants prepare this revised framework. After the revised framework is completed, the Working Group would reconvene for more frequent, solution-focused meetings devoted to resolving non-consensus provisions and filling identified gaps. DCCA estimates that this additional process could be completed within approximately six months after the IDSP WG reconvenes, depending on the frequency of meetings and the scope of the remaining issues.⁶⁸

B. Stakeholder Recommendations

27. **DOEE.** DOEE filed comments and recommendations on the IDSP Working Group's next steps as requested by the Commission during the IDSP Group meeting held on June 23, 2026. DOEE has made six recommendations to the Commission: (1) extend the working group until November 22, 2026 so that the Phase 1 Report can be completed; (2) direct the working group facilitators to provide the structure for the final report and focus future meetings

⁶⁴ DCCA Motion at 1-2.

⁶⁵ DCCA Motion at 2.

⁶⁶ DCCA Motion at 2-3.

⁶⁷ DCCA Motion at 3.

⁶⁸ DCCA Motion at 3.

on refining the report; (3) increase the frequency of meetings to every other week and decrease the duration from four-hour to 90-minutes; (4) continue using the Working Group Facilitators by leveraging flexibility in existing contract or by modifying the contract, but if not possible the Commission should appoint a staff member to facilitate; (5) have the facilitator circulate agendas seven to ten days in advance of meeting to guide discussion; and 6) should set deadlines for written comments and initial draft sections in the final report, as DOEE believes that written comments are more productive than in-person discussions.⁶⁹

28. **GRID2.0.** Grid2.0's recommendations are in line with DOEE, Pepco, and DCCA, to extend the delivery date of the IDSP Working Group report for four to five months. GRID2.0 believes that during that time, the Consultants will consolidate edits to the existing draft framework and other submitted text into a new draft IDSP framework, which should be reviewed and discussed during working group meetings to identify consensus and non-consensus items for further consideration.⁷⁰ GRID2.0 believes the working group report should clarify areas of non-consensus with majority and minority opinions, as well as any issues raised or gaps that need further consideration. GRID2.0 believes Pepco should file a draft IDSP no later than 4 months from the date the Commission approves the working group report.⁷¹ GRID2.0 believes that a two-month working group review should take place following Pepco's IDSP submission, along with an opportunity for public comments, followed by the submission of a final draft IDSP for Commission review. GRID2.0 agrees with DOEE that having agendas sent out prior to working group meetings would be useful.⁷²

29. **DCCA.** DCCA filed recommendations for the IDSP Working Group, requesting a six-month extension.⁷³ DCCA states that the working group could adapt IDSPs from other jurisdictions by holding meetings on an intensive schedule within six months.⁷⁴ DCCA requests that the Commission's staff lead the IDSP Working Group sessions, focus on solution-oriented discussion, compile a directory of comments organized by topic, with links as appropriate, to make access to the IDSP Working Group as easy as possible, and only use presentations when all participants agree on their usefulness.⁷⁵ DCCA recommends that the IDSP Working Group prioritize IDSP objectives and principles to guide the IDSP formulation and differentiate the new IDSP from the current Distribution System Plan.⁷⁶ DCCA states that the IDSP Working Group should focus on integrating distributed energy resources into traditional grid planning, that it

⁶⁹ DOEE Recommendations at 1-2.

⁷⁰ GRID2.0 Recommendations at 1-2.

⁷¹ GRID2.0 Recommendations at 2.

⁷² GRID2.0 Recommendations at 2.

⁷³ DCCA Recommendations at 3.

⁷⁴ DCCA Recommendations at 3.

⁷⁵ DCCA Recommendations at 3, 4.

⁷⁶ DCCA Recommendations at 4.

should create a framework that addresses all topics and subtopics, that it should provide the corresponding consensus and non-consensus positions, and that it should follow and take into account the Maryland Public Service Commission's progress on IDSP and its mandates on Pepco's operations in Maryland.⁷⁷

30. **Pepco.** Pepco filed its recommended next steps in *Formal Case No. 1182*, stating that a limited and narrowly focused extension would allow the IDSP Working Group to direct its full attention to refining the IDSP framework that Pepco will use to develop and file its first IDSP.⁷⁸ Pepco requested that the Commission grant a 120-day extension to the IDSP Working Group to continue the discussion of the issues before it in sufficient detail.⁷⁹ Pepco posits that the continuation of discussions will enable the stakeholders to establish informed positions on specific functions of the framework within the topics directed by Order No. 22464, such as Pepco's Distribution System Planning Criteria.⁸⁰ Pepco recommends that the IDSP Working Group meeting duration should be no longer than two hours, should be focused on identifying areas of consensus, modifications to reach consensus, identifying elements to be included in the initial IDSP, identifying elements to be included in future IDSPs, and identifying areas of non-consensus to report to the Commission.⁸¹ Finally, Pepco recommends that the Commission issue an Order approving the IDSP Working Group's framework and direct Pepco to file its initial IDSP within 120 days of the Order's issuance.⁸² Pepco also supports a continued working group process to gather feedback from stakeholders following the filing of the initial IDSP.⁸³

IV. DECISION

A. **Motions**

31. OPC requests that the Commission require Pepco to prepare and file a proposed IDSP and Updated Planning Criteria Framework before the working group completes Phase 1. OPC contends that stakeholders need a tangible, utility-specific proposal to evaluate and that Pepco's existing planning criteria and forecasting practices require prompt revision. Pepco responds that OPC's requested relief would circumvent the stakeholder process established in Orders Nos. 22464 and 22723 and would require Pepco to prepare an IDSP before the governing framework is complete.

32. DCCA requests a six-month extension of Phase 1 and asks the Commission to suspend the existing process and direct Staff and the Consultants to prepare a revised framework

⁷⁷ DCCA Recommendations at 4.

⁷⁸ Pepco Recommendations at 1.

⁷⁹ Pepco Recommendations at 2.

⁸⁰ Pepco Recommendations at 2-3.

⁸¹ Pepco Recommendations at 2-3.

⁸² Pepco Recommendations at 4-5.

⁸³ Pepco Recommendations at 5.

incorporating the Commission's 2024 Strawman Proposal. DCCA further requests increased Staff control over the meetings, waiver of the redline requirement, and deferral of efforts to integrate other Pepco planning reports.

33. The Commission denies OPC's Motion. Orders Nos. 22464 and 22723 established a stakeholder-driven process in which Phase 1 is intended to develop the requirements, planning criteria, reporting elements, analytical methods, and stakeholder expectations that will govern Pepco's initial IDSP. Requiring Pepco to file an IDSP and a new framework before Phase 1 is complete would reverse the sequence established by the Commission and would not make effective use of the work already performed by the IDSP WG.

34. The Commission grants DCCA's Motion in part and denies it in part. We grant DCCA's request for a six-month extension of Phase 1. However, we do not find that restarting the process would produce benefits commensurate with the resulting delay, duplication of effort, and additional cost. Therefore, the Commission denies DCCA's request to suspend the IDSP WG, replace the existing draft framework with a newly compiled framework, or shift primary facilitation responsibility from the Consultants to Commission Staff.

B. Stakeholder Recommendations

35. The comments and recommendations filed reflect broad agreement that the Commission should establish the first IDSP framework as soon as practicable to avoid stalling grid modernization and risking unnecessary ratepayer costs. There is also Stakeholder consensus supporting a limited extension of Phase 1, ranging from four to six months, additional shorter, solution-focused working group meetings, and that Pepco should file an initial draft IDSP within approximately four months after the Commission approves the framework.

36. The principal disagreement concerns whether the IDSP WG should continue refining the existing draft framework or abandon that work in favor of a new framework. DOEE, Pepco, and GRID2.0 support continued refinement of the existing draft. DCCA proposes a revised framework assembled from the record to date. OPC's Motion would place responsibility on Pepco to prepare a new framework and IDSP for stakeholder review.

37. The Commission finds that the existing draft framework should remain the foundation for completing Phase 1. The working group has made meaningful progress over five (5) meetings, and significant time and financial resources have been invested in developing and refining the draft. Although additional modification is necessary, starting over would be counterproductive and would risk further delay in implementing grid-modernization planning in the District.

38. The Commission further finds that a six (6) month extension of the Phase 1 process is reasonable and should provide Stakeholders with sufficient time to address outstanding issues and complete the remaining Phase 1 work. Accordingly, the deadline for the Phase 1 Report is extended from August 10, 2026, to February 10, 2027. This extension will permit the Consultants and Stakeholders to review the proposed report structure, identify remaining issues, hold additional working group sessions, and prepare the final Phase 1 Report.

39. The Commission directs the Consultants and Stakeholders to adhere to the following process:

- (a) Within fifteen (15) days after the date of this Order, the Consultants shall place in the shared Box workspace an initial outline for the Phase 1 draft Report. The outline shall identify the proposed organization of the report, the anticipated framework sections and appendices, Stakeholder consensus and non-consensus positions, and the location of any proposed supporting materials.
- (b) Within fifteen (15) days after the Consultants submits the initial draft Report outline, each stakeholder may provide written feedback in the shared Box folder and shall provide email notice to the IDSP WG distribution list that its feedback has been submitted. The feedback should identify proposed revisions to the report outline or layout, explain the reason for each proposed revision, and identify any additional topics or subtopics from Order No. 22464 that the Stakeholder believes need to be addressed in the extended Phase 1 working group process.
- (c) Within twenty (20) days after the Stakeholders submit feedback, the Consultants shall reconvene the IDSP WG to discuss Stakeholder comments, propose topics, and present a meeting schedule for the additional working group meetings. Thereafter, the Consultants shall facilitate one two-hour IDSP WG meeting each month through completion of Phase 1. The working group meetings shall focus on resolving identified issues, refining the existing framework, and completing the Phase 1 Report rather than revisiting matters that have already been adequately addressed.

40. The Consultants shall use the Stakeholder feedback and the additional working group discussions to refine the outline, complete the remaining framework provisions, and prepare the Phase 1 Report. The final report shall include the proposed IDSP framework, consensus recommendations, non-consensus recommendations, and requests for Commission clarification. To the extent that strict compliance with the prior directive to provide a redline against the Commission's November 2024 Strawman Proposal would not meaningfully assist the Commission's review because the working group has proceeded from the DOEE-OPC framework, that requirement is waived. The Phase 1 Report shall clearly identify the consensus and non-consensus positions in addition to the Working Group's proposed draft framework.

41. The Commission expects Stakeholders to use the extended Phase 1 schedule efficiently. The purpose of the extension is to finalize a workable baseline framework. Continuing to refine the existing draft preserves the substantial work already completed and represents the least expensive and most efficient path for advancing IDSP implementation without further unnecessary delay.

42. The Commission will address the schedule for Pepco's initial draft IDSP and the subsequent phases of the IDSP process in the Order reviewing the Phase 1 Report. In doing so, the Commission will consider the Stakeholder's general recommendation that Pepco file an initial draft IDSP within approximately four (4) months after approval of the framework.

THEREFORE, IT IS ORDERED THAT:

43. The Office of the People's Counsel for the District of Columbia's Motion Requesting that the Commission Direct Pepco to File the Proposed Integrated Distribution System Plan and Updated Planning Criteria Framework for Stakeholder Review and Input is **DENIED**;

44. The District of Columbia Climate Action's Motion Requesting the Commission to Modify Its Process for Developing the District's First Integrated Distribution System Planning, Adding a Phase and Temporarily Suspending the Integrated Distribution System Planning Working Group Until the Completion of the New Phase is **GRANTED IN PART** and **DENIED IN PART**;

45. The deadline for the Integrated Distribution System Planning Working Group to file its Phase 1 Report is **EXTENDED** from August 10, 2026, to February 10, 2027;

46. The Integrated Distribution System Planning Working Group **SHALL** continue to use the working draft Integrated Distribution System Planning framework as the foundation for completing Phase 1 Framework Development;

47. Within fifteen (15) days after the date of this Order, the Consultants **SHALL** submit an initial outline for the Phase 1 draft report to the shared Box workspace;

48. Within fifteen (15) days after submission of the Consultants' initial outline, Stakeholders **SHALL** submit structured written feedback and proposed discussion topics in the shared Box workspace;

49. Within twenty (20) days after the stakeholder-feedback deadline, the Consultants, **SHALL** reconvene the Integrated Distribution System Planning Working Group for a two-hour meeting;

50. The Consultants **SHALL** facilitate one two-hour Integrated Distribution System Planning Working Group meeting each month through completion of Phase 1; and

51. The requirement that the Phase 1 Report include a redline against the Commission's November 2024 Strawman Proposal is **WAIVED**.

A TRUE COPY:**BY DIRECTION OF THE COMMISSION:****CHIEF CLERK:****BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
1325 G STREET, N.W., SUITE 800
WASHINGTON, D.C. 20005**

July 29, 2026

**FORMAL CASE NO. 1182, IN THE MATTER OF THE INVESTIGATION INTO THE
IMPLEMENTATION OF INTEGRATED DISTRIBUTION SYSTEM PLANNING FOR
ELECTRIC UTILITIES**

PARTIAL CONCURRENCE

OF COMMISSIONER BEVERLY TO ORDER NO. 23133

1. Although I concur that this effort to establish an IDSP framework is a significant step forward, I think we need a bigger step. In response to my independent Notice of Inquiry on this subject, DOEE submitted an order from the New York Public Service Commission that gives a useful rule-based approach to IDSP rather than a framework composed of loose guidelines that basically leaves all the plan details to Pepco's discretion. DOEE also suggested that, where appropriate, we align our plan with efforts already underway in the Maryland Public Service Commission. I agree with both suggestions.

2. There are a few deficiencies in this plan that warrant comment. First, the draft framework does not provide evaluation criteria, including compliance with the District's RPS (including the solar carve-out), or a Commission approval process.

3. Second, the ability of the Commission to implement an effective IDSP requires a fulsome dataset, which may require an expansion of data collection and reporting by the Company. The draft framework appears to limit decision-making on data access to the Company, and to already-existing datasets. In my view, an IDSP should require, at a minimum: overhead/unground wires by voltage; number and capacity of substations; number and capacity of transformers; monitoring and measurement capabilities (i.e. SCADA); annual/seasonal peak demand by substation zone and feeder; line losses; number, capabilities, and locations of islandable microgrids; and historical demand-side management investments and resulting peak demand reduction. While the draft framework does include reporting of "Historical O&M and Capital Spending by project and by Executive Categories, for a minimum of five years of historic data," the reasoning behind the expenditures should also be required. The draft framework calls for the number and type of DER, but should also include the capacity of the DER and location by substation zone/feeder. While the draft framework calls for baseline information on EV chargers, it does not specify the inclusion of their capacity or location information. The IDSP should also include detailed requirements for how the Company reports planned retirements.

4. Third, the draft framework does not address whether forecasts will be provided in

both MWh and MW, whether coincident/non-coincident peaks should be reported, or the provision of probabilistic DER forecasting. The draft framework provides for hourly DER forecasts at the substation and feeder level, but includes language to allow the Company to avoid compliance. The draft framework does not require the Company to model compliance with the solar carve-out of the RPS. In my view, the DER, load, and net forecasts should have specific outputs that include both hourly and peak demand forecasts at the substation zone and feeder. The information should be mandatory. Otherwise, it is not possible to assess DER as grid resources, which is the purpose of an integrated planning exercise. Stakeholders should have a chance to weigh in on DER, load, and net forecasting before an IDSP is implemented. Modeling scenarios should address RPS compliance.

5. Fourth, the draft framework provides room for the Company to include and also improve its hosting capacity analysis (“HCA”), but leaves these improvements as optional. The Company’s HCA needs to be reformed to align with national best practices. Maintaining the overly conservative HCA may result in the Company over-estimating grid needs under various DER forecasts. An amended HCA methodology should be Commission-approved and provide for annual data validation.

6. Fifth, the draft framework does not require Pepco to provide its methodology and calculations for SAIDI, SAIFI, CAIDI, and CEMI-3 for evaluation by stakeholders and the Commission. I believe this should be expressly required. The draft framework requires the provision of data regarding grid needs/constraints, but does not specify the required data. A grid needs assessment should be data-driven, and each identified grid need should include a description of the deficiency, associated engineering characteristics, and timing of the need.

7. Sixth, that brings me to the prioritization of grid needs. The draft framework “Cost-Effectiveness and Equity” section addresses a cost-effectiveness prioritization once solutions have already been identified, but the draft framework does not address prioritization of grid needs themselves. The grid needs assessment should be driven by a prioritization exercise, including criteria, methodology, and outputs from a ranking exercise of grid needs resulting in a transparent explanation and categorization of the needs that require immediate action, near-term action, or longer-term action.

8. Seventh, the draft framework addresses the inclusion non-wires alternatives (“NWA”) but does not state whether NWA, DER, demand-side management, and rate design are reviewed on equal footing with traditional solutions. While the draft framework incorporates the eventual Commission-approved BCA framework in a cost-effectiveness section, it does not require the Company to use the BCA as part of the evaluation criteria for solution selection, instead leaving evaluation criteria up to the Company. While there is an option to provide cost data based on solicitations, there is no requirement for the Company to engage in solicitations to determine the capability, availability, and detailed costs for NWA. The IDSP needs to explicitly review all NWA

on equal footing with traditional solutions, and require the provision of capabilities and detailed cost information of options. Selections should be explicitly based on the Commission-approved BCA framework, and any other evaluation criteria determined by the working group.

9. Finally, the draft framework does not address the development of an Action Plan for Commission approval. An Action Plan submitted for Commission approval should include the following: plans encouraging the deployment of DERs, including contracting through NWAs; plans for permitting, constructing, preparing required reports and other significant activities where replacement, upgrades, or expansion of utility infrastructure has been identified as the best option; plans for the retirement or retrofit of existing major equipment; a timeline that establishes the sequence of events for each action; and plans to solicit competitive bids.

COMMISSION ACTION

**FORMAL CASE NO. 1182, IN THE MATTER OF THE INVESTIGATION INTO THE IMPLEMENTATION
OF INTEGRATED DISTRIBUTION SYSTEM PLANNING FOR ELECTRIC UTILITIES, Order No. 23133**

Date 7/29/26 Formal Case No. 1182 Tariff No. _____ Order No. 23133

	Approve Initial & Date	Partially Concur Initial & Date	Abstain Initial & Date
Chairman Emile Thompson	<u>ET/DJ 7/29/26</u>	_____	_____
Commissioner Richard A. Beverly	_____	<u>RB/DJ 7/29/26</u>	_____
Commissioner Ted Trabue	<u>TT/DJ 7/29/26</u>	_____	_____

Certification of Action

Dionne Joemah
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