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PUBLIC

September 14, 2026

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

Re: Formal Case No. 1130.

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's (Pepco) public response to Order No. 22900 in the referenced case. Pepco invites the Commission or any stakeholders to discuss this response and/or the confidential attachment, or any related issues, if questions arise.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,

/s/ Dennis P. Jamouneau

Dennis P. Jamouneau

Enclosure:

cc: All Parties of Record

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

IN THE MATTER OF	)	
	)	
THE INVESTIGATION INTO	)	
MODERNIZING THE ENERGY	)	
DELIVERY SYSTEM FOR	)	Formal Case No. 1130
INCREASED SUSTAINABILITY	)	
ELECTRIC DISTRIBUTION SERVICE	)	
IN THE DISTRICT OF COLUMBIA	)	
	)	
POTOMAC ELECTRIC POWER COMPANY’S RESPONSE TO ORDER NO. 22900		

Potomac Electric Power Company (“Pepco” or the “Company”) hereby files the revised cost estimate to implement Green Button Connect My Data (“GBCMD”) as directed by Commission Order No. 22900 (“Order”). While Pepco provides its response to the specific directives included in the Order, the Company also recommends that the Commission incorporate lessons learned from Maryland’s Data Exchange Work Group into its Green Button Connect implementation plans. In Maryland Commission Order No. 92398, the Maryland Data Exchange Work Group has been directed to file third party data access regulations and RFP criteria for a statewide Green Button Connect-compliant data exchange platform, alongside other deliverables, by early November, and Pepco expects to receive an order on this filing within six months. Leveraging lessons learned from this effort in Maryland will provide line of sight to opportunities for business convergence and cost savings.

I. RESPONSE

Per the Order, Pepco was directed to file an updated, revised cost estimate to implement GBCMD within 60 days, or by September 14, 2026. In the Order, the Commission explained:

Pepco may file multiple detailed cost estimates, but at least one cost estimate must be for a commercially available Green Button-compliant software package (and any customization, as necessary). The Revised Cost Estimate shall include supporting documentation for each of the cost elements. Pepco's Revised Cost Estimate should also include any relevant supporting details to explain any variance in cost.

Following the issuance of the Order, Pepco internal teams met to discuss the optimal approach to meeting the Commission's directive and recommend an approach that, if approved, would direct Pepco to leverage an off-the-shelf solution implemented by a third party. This cost estimate is based off the awarded response to an RFP Exelon conducted in 2024 exploring implementation of Green Button Connect across the Exelon operating companies. Although a proposal was selected, Exelon did not move forward with this engagement. This proposal included two payment pathways, one of which was a traditional payment model, and one of which enabled the vendor to recoup part of the implementation and maintenance costs via a third-party access fee.

Given that the RFP issued was for an Exelon-wide implementation and the provided cost estimate assumes contemporaneous implementations across Exelon's operating companies, costs for a DC-specific implementation will be higher due to lack of efficiency and scale. Based on the awarded RFP response, and with caveats for the specified assumptions, the updated up-front cost estimate for a 5-year implementation of a Green Button Connect My Data-compliant platform in DC would be \$400,000 under the Third-Party Data Transaction Fee model and \$900,000 under a Traditional payment model.

If the Commission directs Pepco to implement GBCMD, Pepco requests that it be permitted to establish a regulatory asset for the associated costs, including incremental O&M as well as depreciation and amortization expense, to be recovered in a subsequent rate case.

This approach is critical given the magnitude of the potential costs that would be incurred and appropriate because the costs would be incurred pursuant to a Commission directive.

II. STATUS OF GBCMD AND RELATED INITIATIVES IN OTHER EXELON JURISDICTIONS

On May 6, 2026, the Maryland Public Service Commission issued Order No. 92398 on the EDC's VPP Conceptual Reports filed in late 2025. In this order, the Maryland Public Service Commission created the Data Exchange Work Group ("DEWG") to develop multiple deliverables associated with enabling third parties to more easily and securely access customer utility data. Pepco's affiliates are currently actively engaged in DEWG, which has been tasked with developing third party data access regulations, RFP criteria for a GBCMD-compliant customer data exchange platform, a phased DER registry roadmap, and a model third party access tariff to reduce the ongoing impact of the platform costs on the ratepayer. Examining potential implementation pathways and their related cost estimations will be a critical component of this work. Accordingly, Pepco customers and the District would be best served by waiting until DEWG completes its evaluation and considering if there are opportunities to leverage learnings, synergies, and potential cost savings from Maryland before proceeding with GBCMD implementation in DC.

Additionally, insights from Maryland's development of data exchange platform regulations may present opportunities for alignment with the District. Harmonized or complementary regulatory frameworks could enhance customer experience while improving implementation efficiency and reducing administrative complexity.

III. PEPCO'S RECOMMENDATION

Pepco respectfully recommends that the Commission postpone any decisions around GBCMD implementation until DEWG concludes in Maryland. Pepco expects a ruling on this effort within six months. This modest delay will enable the District to incorporate lessons learned from Maryland to unlock opportunities for business convergence and enable Pepco to deliver a cost-effective solution that meets the needs of the District.

Respectfully submitted,

POTOMAC ELECTRIC POWER COMPANY

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Counsel for Potomac Electric Power Company

September 14, 2026

Attachment A

CONFIDENTIAL
ATTACHMENTS UNDER
SEPARATE COVER

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's public response to Order No. 22900 was served this September 14, 2026 on all parties in Formal Case No. 1130 by electronic mail.

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