

Dennis P. Jamouneau  
Assistant General Counsel

EP9628  
701 Ninth Street NW  
Washington, DC 20068-0001

Office 202.872.3034  
Fax 202.331.6767  
pepco.com  
djamouneau@pepcoholdings.com

March 9, 2020

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:

In compliance with Order No. 20286, Pepco Potomac Electric Power Company's ("Pepco") files its Residential TOU Pilot Proposal in the above referenced proceeding.

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

Sincerely,

A handwritten signature in black ink, appearing to read "D. Jamouneau", written over a faint rectangular stamp.

Dennis P. Jamouneau

Enclosures

cc: All Parties of Record

**PowerPath DC (Formal Case No. 1130)**  
**Pepco Residential Time-of-Use Pilot Proposal**  
**March 9, 2020**

**I. Introduction**

As part of the PowerPath DC proceeding, the Rate Design Working Group discussed a variety of alternative rate designs, regulatory models and rate structures that helped achieve the MEDSIS vision. Among them was the use of time-of-use (“TOU”) rates. On January 24, 2020, the Commission issued Order No. 20286 directing Pepco to take certain actions discussed in the PowerPath DC proceeding. In Order No. 20286, the Commission recognized that “simpler rate design approaches, like residential time-of-use rates, can be developed as pilots on an accelerated timeframe.”<sup>1</sup> As a result, the Commission directed Pepco to file a proposal for a pilot residential TOU rate and “assume participants are limited to Standard Offer Service customers, and do not have electric vehicles or behind-the-meter generation.”<sup>2</sup> In compliance with Order No. 20286, Pepco files this Residential TOU Pilot Proposal.

**II. Pilot Design**

Pepco proposes to operate the TOU pilot rate—called Schedule “R-TOU-P”—for three years, collecting treatment and control group data during the first two years and conducting final program evaluation, measurement, and verification in the third year. Customers will have the ability to drop out of the pilot at any time without penalty; however, customers who choose to drop out will not be permitted to re-enroll in the pilot rate. At the end of this three-year period, any customers who are still enrolled in the program will be returned to Schedule “R” and its associated Standard Offer Service (“SOS”), absent extension of the program or implementation of a subsequent program with authorization by the Commission.

The Company proposes to begin recruiting pilot participants in January 2021 in anticipation of a program start date of April 1, 2021. By initiating the pilot during a shoulder month, customers

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<sup>1</sup> Order No. 20286 at ¶ 54.

<sup>2</sup> Order No. 20286 at ¶ 54.

may be in a better position to immediately shift their load and realize savings, potentially reducing customer attrition. This timeline also has the benefit of avoiding immediately entering the holiday season during which customers may be less able to control their electricity usage and more likely to miss recruitment and customer education communications.

In Order No. 20286 the Commission instructed Pepco to "...assume participants are limited to Standard Offer Service customers, and do not have electric vehicles or behind-the-meter generation."<sup>3</sup> In keeping with this directive, Pepco proposes to limit participation to Residential SOS customers currently served under Schedule "R" and who do not receive service under Rider "NEM" or own or lease electric vehicles. Residential Aid Discount ("RAD") customers will be eligible to participate in the pilot. As with Pepco's whole-house TOU rate for customers with plug-in vehicles, Schedule "R-PIV," the Residential TOU pilot will be opt-in only.

In order to produce statically significant results, Pepco estimates that it will need to recruit approximately 835 residential SOS customers to participate in the pilot. If customer enrollment falls below this target due to a lower than anticipated acceptance rate, statistically significant results may still be achievable by modifying the underlying assumptions in the EM&V analysis.

The TOU pilot will use the following pricing periods for summer and winter rate periods:

- Summer (June 1 through October 31)
  - On-Peak: Between the hours of 4pm and 8pm, excluding weekends and the holidays listed below
- Winter (November 1 through May 31)
  - On-Peak: Between the hours of 6am and 9am, excluding weekends and the holidays listed below
- Holidays include New Year's Day, Rev. Martin Luther King's Birthday, Presidents' Day, Memorial Day, Independence Day, Labor Day, Columbus Day, Veterans' Day, Thanksgiving Day, and Christmas Day, as designated by the Federal Government.

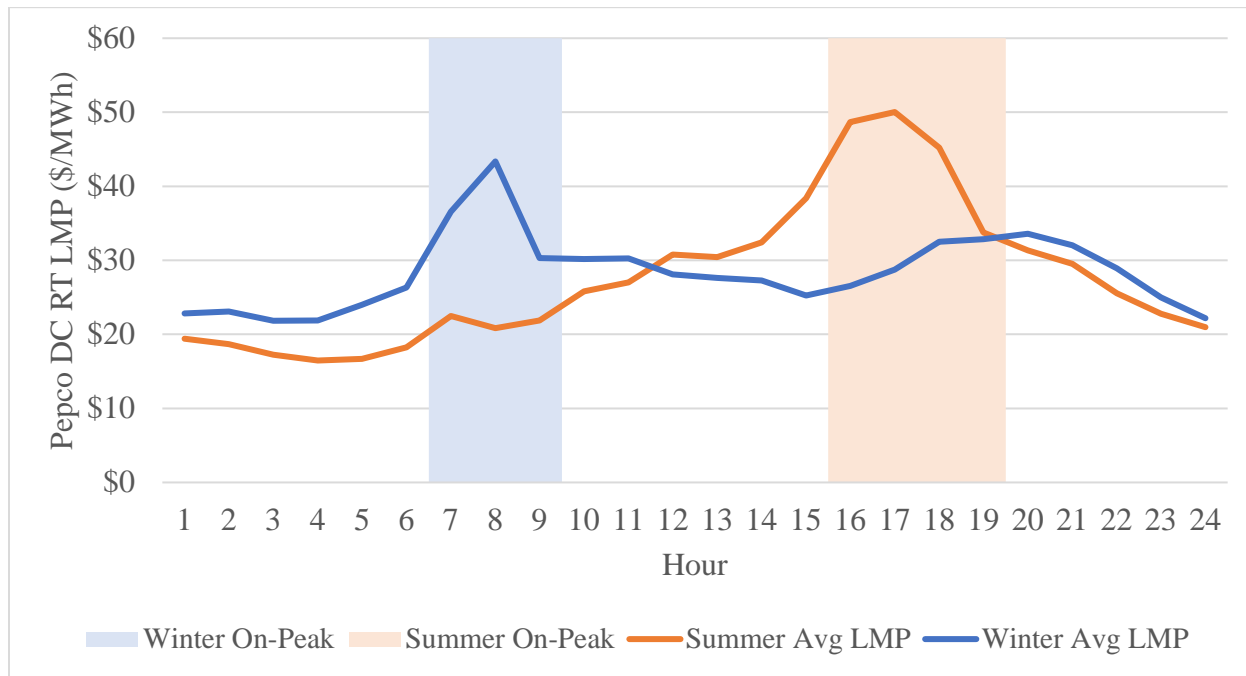
These time windows were developed by analyzing the average hourly Locational Marginal Prices ("LMPs") during summer and winter rate periods. Figure 1 presents the results of this analysis.

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<sup>3</sup> Order No. 20286 at ¶ 54.

The selected on-peak periods capture the hours with the highest average LMPs, and therefore reflect the highest marginal cost of generation.

**Figure 1. Average Pepco DC Realtime Hourly LMPs by Season**



### III. Rate Design

The TOU rates in this pilot will only apply to supply rates, and will not otherwise modify any existing distribution rates, including applicable surcharges. Schedule “R-TOU-P” will have the same distribution rates and surcharges as the current Schedule “R.” Rate schedule-specific factors have been developed based on the ratios of the estimated underlying market costs for each rate element during on- and off-peak hours in summer and winter rate periods. This is the same rate design methodology that was used to develop the rates for Pepco’s whole-house TOU rate (“R-PIV”), which were approved by the Commission through a Notice of Final Tariff dated January 31, 2020.

In addition, TOU pilot customers will be eligible to enroll in the Green Rider (“Rider PIV-Green”), which was also approved by the Commission on January 31, 2020. This rider, which is currently only available to customers served under Schedule “R-PIV”, provides 100-percent renewable energy on an opt-in basis. The rider is a dollar per kilowatt-hour rate, updated twice per year, and

is applied to the Customer’s billed kilowatt-hours. The currently applicable Rider “PIV-Green” rate is equal to \$0.04717 per kilowatt-hour.

Schedule “R” SOS rates are currently adjusted seasonally to reflect the results of the latest SOS auction. As the TOU rates in this pilot will be based on SOS rates, the Company plans to file updates to the TOU rates with the Commission to incorporate any changes in the underlying SOS rates over the course of the pilot. Table 1 presents the proposed summer and winter on- and off-peak TOU supply rates. The proposed tariff language for Schedule “R-TOU-P” is also attached to this filing.

**Table 1. Proposed TOU Pilot Rates**

<b>Season</b>	<b>Current (Flat)</b>	<b>On-Peak</b>	<b>Off-Peak</b>	<b>Ratio</b>
Summer	\$0.05757	\$0.13712	\$0.04480	3.06
Winter	\$0.06020	\$0.20692	\$0.04616	4.48

#### **IV. Customer Education and Outreach**

Pepco plans on filing a Customer Education & Outreach Plan by May 8, 2020. In anticipation of that filing, this petition provides a high-level overview of Pepco’s planned marketing, recruitment, and education efforts. Customer outreach efforts will be scaled to recruit the target sample size described earlier in this petition.

In the recruitment process, Pepco will provide educational information to customers notifying them about the TOU pilot program and inviting them to join. The recruitment packet will include a customized letter along with information detailing the peak rates and hours, an FAQ to address common questions, and ways to shift their peak usage. The customized letter will help enable customers to make an informed enrollment decision by providing a bill comparison showing the impact of the pilot TOU rates based on their prior year’s energy usage. This comparison is provided for two scenarios – no load shifting, and the impact of a 5% to 10% peak usage reduction. The actual percentage used in the load shifting scenario will be determined based on the energy use analysis. Pilot participants will be asked to complete two surveys during the pilot, one after the pilot launch and one at the pilot’s end. The surveys will evaluate the customer experience and obtain demographic data. In order to increase survey response rates, pilot participants will be offered a \$25 incentive payment for completing each survey.

R-TOU-P customers will be recruited based on a random selection from a proportionally stratified population of SOS customers by ZIP code designed to mirror the overall customer base. Pepco will recruit customers using a phased approach with randomly selected customer lists. Mailings will be sent in waves until the required sample size is reached. This phased approach will allow Pepco to assess the response rate and adjust tactics as needed. Pepco will also randomly select a group of customers who will not receive any recruitment materials; these customers will serve as a potential control group for the pilot.

Customers who enroll in the pilot will be mailed a welcome kit providing tips and reminders about the pilot. Participants will also receive periodic mailings and emails reminding them of the seasonal rate and peak hour changes. Peak usage information will be available through My Account along with the ability to sign up for weekly educational emails and usage alerts.

The content and layout of customer bills will not change as compared to the current residential bill with the exception of the new on-peak and off-peak usage information.

#### **V. Evaluation, Measurement, and Verification (“EM&V”)**

Pepco plans to file an EM&V plan by May 8, 2020 to ensure that the results of the pilot are evaluated using widely accepted statistical techniques. The Brattle Group will lead the development of the EM&V plan on behalf of Pepco. Brattle has developed similar plans and carried out impact evaluations for many widely cited pricing, technology, and behavior-based programs, including Pepco’s Maryland residential TOU pilot.

The EM&V plan will specify the data requirements for the econometric analysis, as well as the metrics to be tracked and reported by Pepco. In general, impact metrics will fall into two categories: those regarding electricity consumption and demand (peak demand impact, average daily conservation impact); and those regarding demand elasticities (own-price and substitution elasticities).

Pepco proposes to file a first-year program evaluation with the Commission based on data collected through the first year of the pilot by July 29, 2022, based on the schedule that includes program approval in time to implement the rate on April 1, 2021. This evaluation will report average peak demand reductions and overall conservation impacts in response to the TOU rates. The report will also attempt to estimate the impacts for subpopulations that are of interest to the

Commission (e.g., different household incomes).<sup>4</sup> Pepco will also file a final program evaluation with the Commission within 120 days following the conclusion of the two-year treatment period.

Pepco also proposes producing an interim impact evaluation that would be conducted after the conclusion of the first summer of the pilot to assess early pilot results. This interim evaluation would reveal initial insights from the pilot, including any unexpected results, and allow for course correction for the remainder of the pilot. Pepco would file the results of this interim evaluation with the Commission, along with any program modification requests that stem from the analysis.

## **VI. Budget and Cost Recovery**

If the Commission accepts Pepco's proposed residential TOU pilot, the Company requests the Commission's approval to establish a regulatory asset that would capture incremental costs associated with program development and implementation. Pepco further requests that Company be allowed to accrue a return on this regulatory asset based on the Company's weighted average cost of capital. If approved, Pepco would seek to recover the regulatory asset as part of a future rate case proceeding.

Pepco is in the process of developing its Customer Education and Outreach plan, EM&V plan, and incremental cost estimates. The Company proposes to file its incremental cost estimates by May 8, 2020, alongside its Customer Education and Outreach and EM&V plans. For efficiency, the Company will use existing utility resources where possible to manage development, implementation, and evaluation of the pilot.

## **VII. Timeline**

Pepco is proposing to begin its customer recruitment period on January 1, 2021, with pilot rates becoming effective on April 1, 2021. Based on lessons learned from similar pilot programs in other jurisdictions, Pepco will need to build sufficient time into the pilot implementation schedule to develop the customer recruitment, marketing, and educational materials, and to plan and test the rate structure within the Company's system. Pepco anticipates that there will be approximately four months of implementation work required before the three-month customer recruitment period

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<sup>4</sup> The Company intends to collect demographic data from customers to support this analysis. Given the recruitment structure of the pilot (i.e., opt-in enrollment based on a proportionally stratified population of SOS customers by ZIP code), the pilot may not have a sufficient number of participants for some subpopulations in order to reach scientifically valid conclusions regarding those subpopulations.

begins. Pepco is therefore requesting that the Commission issue a decision on the proposed pilot program by Monday, August 31, 2020. Should the Commission issue its decision at a later date, the Company may be challenged in its efforts to recruit its target customer sample size and implement the proposed rates by April 1, 2021.

As described throughout this filing, Pepco is proposing the following project implementation timeline for the Commission’s consideration. The dates provided below have been developed under the assumption that the Commission accepts the residential TOU pilot as filed by August 31, 2020, and that the full target participant sample size is enrolled prior to April 1, 2021.

**Table 2. Proposed R-TOU-P Timeline**

	<b>Date</b>	<b>Event</b>
On	Monday, March 9, 2020	Proposed Program Filing
By	Friday, May 8, 2020	EM&V Plan, Customer Education & Outreach Plan, and Budget Estimates Filed
By	Monday, August 31, 2020	Commission Approval
On	Friday, January 1, 2021	Recruitment Period Begins
On	Thursday, April 1, 2021	Pilot Year 1 Begins
By	Friday, February 28, 2022	Optional Interim EM&V Report Filed
On	Thursday, March 31, 2022	Pilot Year 1 Ends
On	Friday, April 1, 2022	Pilot Year 2 Begins
By	Friday, July 29, 2022	First Year EM&V Report Filed
On	Friday, March 31, 2023	Pilot Year 2 Ends
On	Saturday, April 1, 2023	Pilot Glide Year Begins
By	Friday, July 28, 2023	Final EM&V Report Filed
On	Sunday, March 31, 2024	Pilot Glide Year Ends



CLEAN

**RATE SCHEDULES**

**FOR**

**ELECTRIC SERVICE**

**IN THE**

**DISTRICT OF COLUMBIA**



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**RATES AND REGULATORY PRACTICES GROUP**

**TABLE OF CONTENTS****RATE SCHEDULES**

RESIDENTIAL SERVICE - SCHEDULE "R".....	Page R-3 - 3.1
RESIDENTIAL ALL-ELECTRIC SERVICE - SCHEDULE "AE" ..... (THIS RIDER HAS BEEN DELETED)	Page R-4 - 4.1
TIME METERED RESIDENTIAL SERVICE - SCHEDULE "R-TM" ..... (THIS RIDER HAS BEEN DELETED)	Page R-5 - 5.1
TIME METERED RESIDENTIAL SERVICE - EXPERIMENTAL PROGRAM - SCHEDULE "R-TM-EX" (THIS SCHEDULE HAS BEEN DELETED) .....	Page R-5.2 -5.3
MASTER METERED APARTMENT – SCHEDULE “MMA” .....	Page R-5.4 – 5.5
GENERAL SERVICE – NON DEMAND - SCHEDULE "GS ND" .....	Page R-6 - 6.1
GENERAL SERVICE - LOW VOLTAGE - SCHEDULE "GS LV" .....	Page R-6.2 - 6.3
GENERAL SERVICE - PRIMARY SERVICE - SCHEDULE "GS 3A" .....	Page R-6.4- 6.5
TIME METERED MEDIUM GENERAL SERVICE - LOW VOLTAGE – SCHEDULE "MGT-LV" .....	Page R-6.6 - 6.7
TEMPORARY OR SUPPLEMENTARY SERVICE - SCHEDULE "T" .....	Page R-7 - 7.1
TIME METERED GENERAL SERVICE - LOW VOLTAGE - SCHEDULE "GT LV" .....	Page R-8 - 8.1
TIME METERED GENERAL SERVICE - PRIMARY SERVICE - SCHEDULE "GT 3A" .....	Page R-8.2- 8.3
TIME METERED GENERAL SERVICE - HIGH VOLTAGE - SCHEDULE "GT 3B" .....	Page R-8.4- 8.5
RAPID TRANSIT SERVICE - SCHEDULE "RT".....	Page R-9 - 9.1
STREET LIGHTING SERVICE - SCHEDULE "SL" .....	Page R-10 - 10.1
TRAFFIC SIGNAL SERVICE - SCHEDULE "TS" .....	Page R-11 - 11.1
SERVICING STREET LIGHTS SERVED FROM OVERHEAD LINES - SCHEDULE "SSL-OH" .....	Page R-12 - 12.1
SERVICING STREET LIGHTS SERVED FROM UNDERGROUND LINES - SCHEDULE "SSL-UG" .....	Page R-13 - 13.1
TELECOMMUNICATIONS NETWORK SERVICE - SCHEDULE "TN".....	Page R-14 – 14.1

**TABLE OF CONTENTS  
(CONTINUED)**

COGENERATION AND SMALL POWER PRODUCTION INTERCONNECTION SERVICE - SCHEDULE "CG-SPP" .....	Page R-15 - 15.4
STANDBY SERVICE - SCHEDULE "S" .....	Page R-16 - 16.1
COMMUNITY RENEWABLE ENERGY FACILITY - SCHEDULE "CREF".....	Page R-17 – 17.2
LED OUTDOOR LIGHTING SERVICE – SCHEDULE “OL-LED“ .....	Page R-18
RESIDENTIAL SERVICE – PLUG-IN VEHICLE CHARGING SCHEDULE – “R-PIV” .....	Page R-19 - 19.1
RESIDENTIAL SERVICE – TIME-OF-USE PILOT PROGRAM SCHEDULE –“R-TOU-P”	Page R-20 - 20.1
RESERVED FOR FUTURE USE.....	Page R-21 - 24
<b>RIDERS</b>	
MARKET PRICE SERVICE - RIDER "MPS" .....	Page R-25
(THIS RIDER HAS BEEN DELETED)	
RELIABLE ENERGY TRUST FUND- RIDER "RETF" .....	Page R-26
(THIS RIDER HAS BEEN DELETED)	
EXPERIMENTAL RESIDENTIAL ELECTRIC VEHICLE SERVICE - RIDER "R-EV"(THIS RIDER HAS BEEN DELETED) .....	Page R-27
EXPERIMENTAL RESIDENTIAL TIME-OF-USE ELECTRIC VEHICLE SERVICE - RIDER "R-TM-EV" (THIS RIDER HAS BEEN DELETED).....	Page R-28
RESIDENTIAL AID DISCOUNT - RIDER "RAD" .....	Page R-29
POWER FACTOR - RIDER "PF" .....	Page R-30
TELECOMMUNICATION NETWORK CHARGE - RIDER "SL-TN" .....	Page R-31
DELIVERY TAX - RIDER "DT".....	Page R-32
PUBLIC SPACE OCCUPANCY SURCHARGE - RIDER "PSOS" .....	Page R-33
GENERATION PROCUREMENT CREDIT - RIDER "GPC" .....	Page R-34 - 34.1
(THIS RIDER HAS BEEN DELETED)	
FUEL ADJUSTMENT CHARGE - RIDER "FA" (THIS RIDER HAS BEEN DELETED).....	Page R-35 - 35.1
ENVIRONMENTAL COST RECOVERY RIDER - RIDER "ECRR" .....	Page R-36 - 36.3
(THIS RIDER HAS BEEN DELETED)	
EXCESS FACILITIES - RIDER "EF" .....	Page R-37
OPTIONAL METER EQUIPMENT RELATED SERVICES - RIDER "OMRS" .....	Page R-38 - 38.1
DIVESTITURE SHARING CREDIT - RESIDENTIAL - RIDER "DS-R" .....	Page R-39
(THIS RIDER HAS BEEN DELETED)	

Date of Issue:

Date Effective: Usage on and after

**TABLE OF CONTENTS  
(CONTINUED)**

DIVESTITURE SHARING CREDIT- NON-RESIDENTIAL - RIDER "DS-NR" .....	Page R-40 - 40.1
(THIS RIDER HAS BEEN DELETED)	
STANDARD OFFER SERVICE - RIDER "SOS" .....	Page R-41 - 41.9
ADMINISTRATIVE CREDIT - RIDER "AC" .....	Page R-42
RESERVED DELIVERY CAPACITY SERVICE – RIDER "RDCS" .....	Page R-43 – 43.1
RIDER "PCDC" – POWERCENTSDC™ PROJECT .....	Page R-44 – 44.6
(THIS RIDER HAS BEEN DELETED)	
NET ENERGY METERING RIDER – RIDER "NEM" .....	Page R-45 – 45.1
RESIDENTIAL AID DISCOUNT SURCHARGE RIDER – RIDER "RADS" .....	Page R-46
SUSTAINABLE ENERGY TRUST FUND – RIDER "SETF" .....	Page R-47
ENERGY ASSISTANCE TRUST FUND – RIDER "EATF" .....	Page R-48
BILL STABILIZATION ADJUSTMENT – RIDER "BSA" .....	Page R-49
RESIDENTIAL DIRECT LOAD CONTROL – RIDER "R-DLC" .....	Page R-50
UNDERGROUND PROJECT CHARGE – RIDER "UPC" .....	Page R-51
COMMUNITY NET METERING – RIDER "CNM" .....	Page R-52 – 52.1
CUSTOMER BASE RATE CREDIT – RIDER "CBRC" .....	Page R-53
DDOT UNDERGROUND ELECTRIC COMPANY INFRASTRUCTURE IMPROVEMENT CHARGE RECOVERY – UNDERGROUND RIDER .....	Page R-54
EXCESS DEFERRED INCOME TAX CREDIT – RIDER "EDIT" .....	Page R-55 – 55.2
EXPERIMENTAL SENIOR CITIZEN AND DISABLED RESIDENT RATE CREDIT – RIDER "SCARRC" .....	Page R-56
PLUG-IN VEHICLE – GREEN RIDER RIDERS – "PIV-GREEN" .....	Page R-57

**RESIDENTIAL SERVICE – TIME-OF-USE PILOT PROGRAM**

**SCHEDULE "R-TOU-P"**

**AVAILABILITY**

Available to existing Schedule “R” Standard Offer Service customers who meet the following criteria: (1) are part of the pilot treatment group; (2) elect to participate in the pilot program; (3) have been a customer of record at their premise for 12 or more consecutive months; and (4) have interval data at their premise for 12 or more consecutive months. The generation service supplied under this schedule is supplied at time-differentiated seasonal rates for residential electric purposes. All electricity provided under this schedule is delivered through the same meter.

Net energy metering customers are not eligible for this schedule. Additionally, the following customers are excluded from being enrolled to this rate for operational reasons: customers without activated advanced metering infrastructure (AMI) capable of registering interval usage; customers who own or lease a plug-in vehicle with an electric range of greater than 30 miles; or customers enrolled in the Emergency Medical Equipment Notification Program.

The rate will be effective with the customer’s first bill cycle falling on or after April 1, 2021 and remain for three years, or until the customer decides to opt-out of the rate, at which time they will be placed on Residential Service Schedule “R.” Customers who choose to opt-out of the pilot shall not be allowed to return to this schedule. A customer may sign up for the rate until April 1, 2022, provided the pilot is not fully subscribed, and the tariff will be in effect until April 1, 2024.

**CHARACTER OF SERVICE**

The service supplied under this schedule normally will be alternating current, sixty hertz, single phase, three wire, 120/240 volts, or three wire, 120/208 volts.

**MONTHLY RATE**

	<b>Summer</b>	<b>Winter</b>
<b>Distribution Service Charge</b>		
Customer Charge – Residential	\$15.09 per month	\$ 15.09 per month
<b>Kilowatt-hour Charge</b>		
First 400 kilowatt-hours	\$ 0.00800 per kwhr	\$ 0.00800 per kwhr
In excess of 400 kilowatt hours	\$ 0.02283 per kwhr	\$ 0.01594 per kwhr

**Generation and Transmission Service Charges** – Customers will receive Generation and Transmission Service, including the Procurement Cost Adjustment, from the Company under the provisions of Rider “SOS” – Standard Offer Service at the following rates:

	<b>Summer</b>	<b>Winter</b>
<b>Generation Service Charge</b>		
All kilowatt-hours – On-Peak	\$ 0.13712 per kwhr	\$ 0.20692 per kwhr
All kilowatt-hours – Off-Peak	\$ 0.04480 per kwhr	\$ 0.04616 per kwhr
All kilowatt-hours – Admin Charge	\$ 0.00300 per kwhr	\$ 0.00300 per kwhr
	<b>Summer</b>	<b>Winter</b>
<b>Transmission Service Charge</b>		
Minimum Charge*	\$ 0.12 per customer	\$ 0.12 per customer
In excess of 30 kilowatt-hours	\$ 0.00790 per kwhr	\$ 0.00790 per kwhr

\*The minimum charge includes the first 30 kWh or fraction thereof of consumption.

**Procurement Cost Adjustment**

See <https://www.pepco.com/MyAccount/MyBillUsage/Pages/DC/CurrentTariffsDC.aspx> for the currently effective rate.

**BILLING MONTHS**

**Summer** – Billing months of June through October.

**Winter** – Billing months of November through May.

**PEAK HOURS**

**Summer** – On Peak hours will be between the hours of 4:00 p.m. and 8:00 p.m., Monday through Friday, excluding holidays.

**Winter** – On Peak hours will be between the hours of 6:00 a.m. and 9:00 a.m., Monday through Friday, excluding holidays.

**METER READING**

Watt-hour meters will be read to the nearest multiple of the meter constant and bills rendered accordingly.

**GENERAL TERMS AND CONDITIONS**

This schedule is subject in all respects to the Company's "General Terms and Conditions for Furnishing Electric Service" and the Company's "Electric Service Rules and Regulations."

**APPLICABLE RIDERS**

Administrative Credit  
Delivery Tax  
Public Space Occupancy Surcharge  
Residential Aid Discount  
Optional Meter Equipment Related Services  
Residential Aid Discount Surcharge Rider  
Sustainable Energy Trust Fund  
Energy Assistance Trust Fund  
Bill Stabilization Adjustment  
Residential Direct Load Control Rider  
Underground Project Charge Rider  
Community Net Metering Rider  
Customer Base Rate Credit Rider  
Underground Rider  
Excess Deferred Income Tax Credit  
Rider PIV-Green

**REDLINE**



**RATE SCHEDULES**

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**TABLE OF CONTENTS**RATE SCHEDULES

RESIDENTIAL SERVICE - SCHEDULE "R".....	Page R-3 - 3.1
RESIDENTIAL ALL-ELECTRIC SERVICE - SCHEDULE "AE" ..... (THIS RIDER HAS BEEN DELETED)	Page R-4 - 4.1
TIME METERED RESIDENTIAL SERVICE - SCHEDULE "R-TM" ..... (THIS RIDER HAS BEEN DELETED)	Page R-5 - 5.1
TIME METERED RESIDENTIAL SERVICE - EXPERIMENTAL PROGRAM - SCHEDULE "R-TM-EX" (THIS SCHEDULE HAS BEEN DELETED) .....	Page R-5.2 -5.3
MASTER METERED APARTMENT – SCHEDULE “MMA” .....	Page R-5.4 – 5.5
GENERAL SERVICE – NON DEMAND - SCHEDULE "GS ND" .....	Page R-6 - 6.1
GENERAL SERVICE - LOW VOLTAGE - SCHEDULE "GS LV" .....	Page R-6.2 - 6.3
GENERAL SERVICE - PRIMARY SERVICE - SCHEDULE "GS 3A" .....	Page R-6.4- 6.5
TIME METERED MEDIUM GENERAL SERVICE - LOW VOLTAGE – SCHEDULE "MGT-LV" .....	Page R-6.6 - 6.7
TEMPORARY OR SUPPLEMENTARY SERVICE - SCHEDULE "T" .....	Page R-7 - 7.1
TIME METERED GENERAL SERVICE - LOW VOLTAGE - SCHEDULE "GT LV" .....	Page R-8 - 8.1
TIME METERED GENERAL SERVICE - PRIMARY SERVICE - SCHEDULE "GT 3A" .....	Page R-8.2- 8.3
TIME METERED GENERAL SERVICE - HIGH VOLTAGE - SCHEDULE "GT 3B" .....	Page R-8.4- 8.5
RAPID TRANSIT SERVICE - SCHEDULE "RT".....	Page R-9 - 9.1
STREET LIGHTING SERVICE - SCHEDULE "SL" .....	Page R-10 - 10.1
TRAFFIC SIGNAL SERVICE - SCHEDULE "TS" .....	Page R-11 - 11.1
SERVICING STREET LIGHTS SERVED FROM OVERHEAD LINES - SCHEDULE "SSL-OH" .....	Page R-12 - 12.1
SERVICING STREET LIGHTS SERVED FROM UNDERGROUND LINES - SCHEDULE "SSL-UG" .....	Page R-13 - 13.1
TELECOMMUNICATIONS NETWORK SERVICE - SCHEDULE "TN".....	Page R-14 – 14.1

**TABLE OF CONTENTS  
(CONTINUED)**

COGENERATION AND SMALL POWER PRODUCTION INTERCONNECTION SERVICE - SCHEDULE "CG-SPP" .....	Page R-15 - 15.4
STANDBY SERVICE - SCHEDULE "S" .....	Page R-16 - 16.1
COMMUNITY RENEWABLE ENERGY FACILITY - SCHEDULE "CREF".....	Page R-17 – 17.2
LED OUTDOOR LIGHTING SERVICE – SCHEDULE “OL-LED“ .....	Page R-18
RESIDENTIAL SERVICE – PLUG-IN VEHICLE CHARGING SCHEDULE – “R-PIV” .....	Page R-19 - 19.1
<u>RESIDENTIAL SERVICE – TIME-OF-USE PILOT PROGRAM SCHEDULE –“R-TOU-P”</u>	<u>Page R-20 - 20.1</u>
RESERVED FOR FUTURE USE.....	Page R- <del>20</del> <u>1</u> - 24
<b>RIDERS</b>	
MARKET PRICE SERVICE - RIDER "MPS" .....	Page R-25
(THIS RIDER HAS BEEN DELETED)	
RELIABLE ENERGY TRUST FUND- RIDER "RETF" .....	Page R-26
(THIS RIDER HAS BEEN DELETED)	
EXPERIMENTAL RESIDENTIAL ELECTRIC VEHICLE SERVICE - RIDER "R-EV"(THIS RIDER HAS BEEN DELETED) .....	Page R-27
EXPERIMENTAL RESIDENTIAL TIME-OF-USE ELECTRIC VEHICLE SERVICE - RIDER "R-TM-EV" (THIS RIDER HAS BEEN DELETED).....	Page R-28
RESIDENTIAL AID DISCOUNT - RIDER "RAD" .....	Page R-29
POWER FACTOR - RIDER "PF" .....	Page R-30
TELECOMMUNICATION NETWORK CHARGE - RIDER "SL-TN" .....	Page R-31
DELIVERY TAX - RIDER "DT".....	Page R-32
PUBLIC SPACE OCCUPANCY SURCHARGE - RIDER "PSOS" .....	Page R-33
GENERATION PROCUREMENT CREDIT - RIDER "GPC" .....	Page R-34 - 34.1
(THIS RIDER HAS BEEN DELETED)	
FUEL ADJUSTMENT CHARGE - RIDER "FA" (THIS RIDER HAS BEEN DELETED).....	Page R-35 - 35.1
ENVIRONMENTAL COST RECOVERY RIDER - RIDER "ECRR" .....	Page R-36 - 36.3
(THIS RIDER HAS BEEN DELETED)	
EXCESS FACILITIES - RIDER "EF" .....	Page R-37
OPTIONAL METER EQUIPMENT RELATED SERVICES - RIDER "OMRS" .....	Page R-38 - 38.1
DIVESTITURE SHARING CREDIT - RESIDENTIAL - RIDER "DS-R" .....	Page R-39
(THIS RIDER HAS BEEN DELETED)	

**TABLE OF CONTENTS  
(CONTINUED)**

DIVESTITURE SHARING CREDIT- NON-RESIDENTIAL - RIDER "DS-NR" .....	Page R-40 - 40.1
(THIS RIDER HAS BEEN DELETED)	
STANDARD OFFER SERVICE - RIDER "SOS" .....	Page R-41 - 41.9
ADMINISTRATIVE CREDIT - RIDER "AC" .....	Page R-42
RESERVED DELIVERY CAPACITY SERVICE – RIDER "RDCS" .....	Page R-43 – 43.1
RIDER "PCDC" – POWERCENTSDC™ PROJECT .....	Page R-44 – 44.6
(THIS RIDER HAS BEEN DELETED)	
NET ENERGY METERING RIDER – RIDER "NEM" .....	Page R-45 – 45.1
RESIDENTIAL AID DISCOUNT SURCHARGE RIDER – RIDER "RADS" .....	Page R-46
SUSTAINABLE ENERGY TRUST FUND – RIDER "SETF" .....	Page R-47
ENERGY ASSISTANCE TRUST FUND – RIDER "EATF" .....	Page R-48
BILL STABILIZATION ADJUSTMENT – RIDER "BSA" .....	Page R-49
RESIDENTIAL DIRECT LOAD CONTROL – RIDER "R-DLC" .....	Page R-50
UNDERGROUND PROJECT CHARGE – RIDER "UPC" .....	Page R-51
COMMUNITY NET METERING – RIDER "CNM" .....	Page R-52 – 52.1
CUSTOMER BASE RATE CREDIT – RIDER "CBRC" .....	Page R-53
DDOT UNDERGROUND ELECTRIC COMPANY INFRASTRUCTURE IMPROVEMENT CHARGE RECOVERY – UNDERGROUND RIDER .....	Page R-54
EXCESS DEFERRED INCOME TAX CREDIT – RIDER "EDIT" .....	Page R-55 – 55.2
EXPERIMENTAL SENIOR CITIZEN AND DISABLED RESIDENT RATE CREDIT – RIDER "SCARRC" .....	Page R-56
PLUG-IN VEHICLE – GREEN RIDER RIDERS – "PIV-GREEN" .....	Page R-57

**RESIDENTIAL SERVICE – TIME-OF-USE PILOT PROGRAM**

**SCHEDULE "R-TOU-P"**

**AVAILABILITY**

Available to existing Schedule “R” Standard Offer Service customers who meet the following criteria: (1) are part of the pilot treatment group; (2) elect to participate in the pilot program; (3) have been a customer of record at their premise for 12 or more consecutive months; and (4) have interval data at their premise for 12 or more consecutive months. The generation service supplied under this schedule is supplied at time-differentiated seasonal rates for residential electric purposes. All electricity provided under this schedule is delivered through the same meter.

Net energy metering customers are not eligible for this schedule. Additionally, the following customers are excluded from being enrolled to this rate for operational reasons: customers without activated advanced metering infrastructure (AMI) capable of registering interval usage; customers who own or lease a plug-in vehicle with an electric range of greater than 30 miles; or customers enrolled in the Emergency Medical Equipment Notification Program.

The rate will be effective with the customer’s first bill cycle falling on or after April 1, 2021 and remain for three years, or until the customer decides to opt-out of the rate, at which time they will be placed on Residential Service Schedule “R.” Customers who choose to opt-out of the pilot shall not be allowed to return to this schedule. A customer may sign up for the rate until April 1, 2022, provided the pilot is not fully subscribed, and the tariff will be in effect until April 1, 2024.

**CHARACTER OF SERVICE**

The service supplied under this schedule normally will be alternating current, sixty hertz, single phase, three wire, 120/240 volts, or three wire, 120/208 volts.

**MONTHLY RATE**

	<b><u>Summer</u></b>	<b><u>Winter</u></b>
<b><u>Distribution Service Charge</u></b>		
Customer Charge – Residential	\$15.09 per month	\$ 15.09 per month
<b><u>Kilowatt-hour Charge</u></b>		
First 400 kilowatt-hours	\$ 0.00800 per kwhr	\$ 0.00800 per kwhr
In excess of 400 kilowatt hours	\$ 0.02283 per kwhr	\$ 0.01594 per kwhr

**Generation and Transmission Service Charges** – Customers will receive Generation and Transmission Service, including the Procurement Cost Adjustment, from the Company under the provisions of Rider “SOS” – Standard Offer Service at the following rates:

	<b><u>Summer</u></b>	<b><u>Winter</u></b>
<b><u>Generation Service Charge</u></b>		
All kilowatt-hours – On-Peak	\$ 0.13712 per kwhr	\$ 0.20692 per kwhr
All kilowatt-hours – Off-Peak	\$ 0.04480 per kwhr	\$ 0.04616 per kwhr
All kilowatt-hours – Admin Charge	\$ 0.00300 per kwhr	\$ 0.00300 per kwhr
<b><u>Transmission Service Charge</u></b>		
Minimum Charge*	\$ 0.12 per customer	\$ 0.12 per customer
In excess of 30 kilowatt-hours	\$ 0.00790 per kwhr	\$ 0.00790 per kwhr

\*The minimum charge includes the first 30 kWh or fraction thereof of consumption.

**Procurement Cost Adjustment**

See <https://www.pepco.com/MyAccount/MyBillUsage/Pages/DC/CurrentTariffsDC.aspx> for the currently effective rate.

**BILLING MONTHS**

**Summer** – Billing months of June through October.

**Winter** – Billing months of November through May.

**PEAK HOURS**

**Summer** – On Peak hours will be between the hours of 4:00 p.m. and 8:00 p.m., Monday through Friday, excluding holidays.

**Winter** – On Peak hours will be between the hours of 6:00 a.m. and 9:00 a.m., Monday through Friday, excluding holidays.

**METER READING**

Watt-hour meters will be read to the nearest multiple of the meter constant and bills rendered accordingly.

**GENERAL TERMS AND CONDITIONS**

This schedule is subject in all respects to the Company's "General Terms and Conditions for Furnishing Electric Service" and the Company's "Electric Service Rules and Regulations."

**APPLICABLE RIDERS**

Administrative Credit

Delivery Tax

Public Space Occupancy Surcharge

Residential Aid Discount

Optional Meter Equipment Related Services

Residential Aid Discount Surcharge Rider

Sustainable Energy Trust Fund

Energy Assistance Trust Fund

Bill Stabilization Adjustment

Residential Direct Load Control Rider

Underground Project Charge Rider

Community Net Metering Rider

Customer Base Rate Credit Rider

Underground Rider

Excess Deferred Income Tax Credit

Rider PIV-Green

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Residential TOU Pilot Proposal was served this March 9, 2020 on all parties in Formal Case No. 1130 by electronic mail.

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

Christopher Lipscombe, Esq.  
General Counsel  
Public Service Commission  
of the District of Columbia  
1325 G Street N.W. Suite 800  
Washington, DC 20005  
clipscombe@psc.dc.gov

Brian R. Caldwell  
Assistant Attorney General  
Public Advocacy Section  
Office of the Attorney General for  
the District of Columbia  
441 Fourth Street, N.W., Suite 600-S  
Washington, D.C. 20001  
Brian.caldwell@dc.gov

Meena Gowda, Esq.  
Deputy General Counsel  
DC Water and Sewer Authority  
5000 Overlook Avenue, S.W.  
Washington, DC 20032  
Meena.gowda@dcwater.com

Sandra Mattavous-Frye, Esq.  
People's Counsel  
Nicole W. Sitaraman  
Office of People's Counsel  
1133 15<sup>th</sup> Street, N.W.  
Suite 500  
Washington, DC 20005  
smfrye@opc-dc.gov  
nsitaraman@opc-dc.gov

John S. Tobey, Esq.  
U.S. General Services Administration  
1800 F Street, NW Room 2012B  
Washington, DC 20405  
john.tobey@gsa.gov

Cathy Thurston-Seignious  
Washington Gas Light Company  
101 Constitution Avenue, NW Suite 300  
Washington, DC 20080  
cthurston-seignious@washgas.com

  
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Dennis P. Jamouneau