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April 23, 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:

Enclosed please find Potomac Electric Power Company's District of Columbia "strawman" residential dynamic pricing program proposal pursuant to Order No. 20286 in the referenced proceeding.

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

Sincerely,

/s/ Andrea H. Harper

Andrea H. Harper

Enclosures

cc: All Parties of Record

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

IN THE MATTER OF

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**In the Matter of the Investigation Into
Modernizing the Energy Delivery System
for Increased Sustainability**

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Formal Case No. 1130

**POTOMAC ELECTRIC POWER COMPANY'S DISTRICT OF COLUMBIA
RESIDENTIAL DYNAMIC PRICING PROGRAM STRAWMAN PROPOSAL**

April 23, 2020

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Introduction

The Potomac Electric Power Company (“Pepco” or “the Company”) hereby submits to the Public Service Commission of the District of Columbia (“Commission”) its “strawman” residential dynamic pricing program for consideration by the reconvened Rate Design Working Group (“RDWG”). This filing is made pursuant to the District of Columbia Public Service Commission (“Commission”) Order No. 20286 issued in Formal Case No. 1130 on January 24, 2020 and the Commission’s “Notice of Rate Design Working Group Meeting” issued on March 27, 2020 in Formal Case No. 1130.¹

The Commission’s prior approval of Pepco’s deployment of an Advanced Metering Infrastructure System (“AMI”) throughout the District of Columbia has enabled the proposed dynamic pricing rate design. The Company formulated the proposed dynamic pricing rate plan from:

- The experience gained from the District of Columbia’s award-winning PowerCentsDC™ smart meter pilot program;
- Pepco’s experience with residential dynamic pricing in Maryland since 2012;
- The experience of its affiliated utility, Delmarva Power, with residential dynamic pricing in Maryland and Delaware since 2012; and
- The experience of its affiliated utility, the Baltimore Gas & Electric Company, with residential dynamic pricing in Maryland since 2013.

¹ The Company previously filed its proposed dynamic pricing plan in the District of Columbia on April 1, 2010 in Formal Case Nos. 1056 and 1070. The Commission rejected Pepco’s dynamic pricing plan through Order No. 16377 in Formal Case No. 1056, issued on May 26, 2011. Pepco filed a revised residential dynamic pricing proposal on October 7, 2013 in Case No’s 1083 and 1086. The Commission rejected Pepco’s revised dynamic pricing proposal through Order No. 17375 in Formal Case No.s 1086 and 1109 on February 6, 2014.

At this time approximately 2 million residential electricity customers in Maryland and Delaware have the opportunity to participate in dynamic pricing.² Collectively, these programs have provided millions of dollars in residential electric bill rebates since their inception in 2012.

Pepco will discuss its proposed residential dynamic program with the RDWG participants and file a revised proposal with the Commission for its consideration. If the Commission approves the proposal by year-end 2020, the Company will implement dynamic pricing for all residential distribution customers in the District of Columbia during the summer of 2021. This implementation timeline assumes that the form of dynamic pricing is similar to Pepco's dynamic pricing program in Maryland – thereby avoiding significant operational system changes, billing changes and substantial revisions to educational messaging. Immediately preceding the introduction of residential dynamic pricing in the District of Columbia Pepco will launch an education campaign to inform residential customers of the benefits of dynamic pricing and to offer tips to residential customers on ways to reduce their energy use during dynamic pricing Savings Events.

Background

The concept of dynamic pricing for electricity is to offer Pepco customers a price signal that more directly tracks wholesale market electricity prices rather than rely on prices that are fixed and do not track actual market conditions. The availability of AMI meters that gather hourly energy use information for all customers enables residential dynamic pricing. Under dynamic

² Approximately 5,000 Pepco Maryland customers were placed on the critical peak rebate form of pricing during the 2012 summer to test and refine operational readiness and all Pepco Maryland residential distribution customers were placed on the rate beginning on June 1, 2013. (Maryland Public Service Commission Case No. 9207) Approximately 6,000 Delmarva Power Delaware customers were placed on the critical peak rebate form of pricing during the 2012 summer to test and refine operational readiness and all Delmarva Power Delaware residential SOS customers were placed on the rate beginning June 1, 2013. (Delaware Public Service Commission Docket No. 09-311) BGE began offering its residential dynamic pricing to customers during the 2013 summer. (Maryland Public Service Commission Case No. 9207)

pricing, customers are provided price signals that encourage customers to reduce their electricity consumption during periods of high electricity loads and high wholesale market electricity prices.

These energy reductions:

- Lower customer electric bills;
- Reduce peak electric loads;
- Reduce high wholesale market energy prices;
- Help to reduce the need to construct additional distribution, transmission and generating facilities;
- Reduce power plant air emissions; and
- Help grid operators to reliably supply electricity.

District of Columbia Residential Smart Meter Pilot Program -- PowerCentsDC™

The District of Columbia has direct experience with residential dynamic pricing. Pepco, together with the Commission, the Office of the People's Counsel ("OPC"), the District of Columbia Consumer Utility Board ("CUB"), and the International Brotherhood of Electrical Workers Local 1900 ("IBEW") formed the Smart Meter Pilot Program, Inc. ("SMPPI") in 2006 and conducted a pilot to test District of Columbia residential customer reaction to dynamic pricing. The pilot consisted of the deployment of a limited number of smart meters and the test of three forms of dynamic pricing: 1) hourly pricing, 2) critical peak pricing (prices higher during select hours and lower during all other hours), and 3) critical peak rebate (a rebate for load reductions during select hours).

The District of Columbia residential smart meter pilot program tested residential customer response to AMI-enabled dynamic pricing during the summers of 2008 and 2009 and the winter of 2008/2009. The Commission approved the pilot program that was designed and operated by

SMPPI. Under the PowerCentsDC™ pilot, Pepco residential customers served under Standard Offer Service (“SOS”) rates from all eight wards of the District were invited on a randomized basis to participate in the study. Pilot participants received a smart meter capable of providing hourly electric energy consumption readings on a daily basis to Pepco. Participants, as noted earlier, were placed under one of three dynamic pricing rates: 1) critical peak rebates, 2) critical peak pricing, or 3) hourly pricing. Through these pricing options, participating customers could save on their bills by reducing electricity use when Savings Events were called. These times are known as “critical peak hours” (up to 60 hours per year under the pilot) and “critical peak days” (up to 15 days per year under the pilot). Randomly selected residential customers were placed in a control group that received smart meters to permit comparison of the energy consumption of those customers who were placed under dynamic pricing (the “treatment group”) to the control group customers. Customers with central air conditioners were offered the opportunity to receive a smart thermostat to automatically reduce their air conditioner compressor loads during critical peak periods.

Dr. Frank Wolak of Stanford University completed an independent statistical analysis of the load impacts of the program during September 2010 over the period of July 2008 through October 2009. The evaluation determined that the greatest quantity of peak demand reductions occurred under the critical peak pricing rates. The hourly dynamic pricing rate did not produce statistically significant savings estimates for regular residential customers. The achieved reductions for regular residential customers are shown below. (PowerCentsDC™ Final Report, September 2010 at 32.)

- Critical Peak Pricing – 29% Reduction
- Critical Peak Rebate – 11% Reduction

Low income customers who participated in the program were restricted to the critical peak rebate program and achieved slightly lower peak demand reductions compared to regular residential customers that were not low income. Peak demand savings were significantly higher for customers with smart thermostats. Peak demand savings were determined to be higher as the outdoor temperatures increase. (PowerCentsDC™ Final Report, September 2010 at 3 and 4.)

After billing under the PowerCentsDC™ pilot concluded in October 2009, a participant satisfaction survey was conducted by SMPPI. The results of this study indicated a high level of customer satisfaction with the pilot program. Notably, more than 90 percent of participants preferred their dynamic pricing rate over the rate that they were previously served under and 89 percent of participants would recommend PowerCentsDC™ dynamic pricing to friends and family. CPR prices were the most preferred form of dynamic pricing. (PowerCentsDC™ Final Report at 5)

Pepco Maryland Experience

Pepco introduced residential dynamic pricing in Maryland during the summer of 2012 to an initial group of 5,000 customers. Beginning during the summer of 2013, all Pepco Maryland residential distribution customers were placed on dynamic pricing regardless of their selected electricity supplier and continue to be served under this rate today.³ The name of the rate is the Peak Energy Savings Credit (“PESC”) Program. In Maryland, Pepco proposed and the Maryland Public Service Commission approved a CPR form of dynamic pricing which provides customers a distribution bill rebate of \$1.25 per kWh reduced.⁴ Achieved reductions are measured by a

³ Delmarva Power operates an identical residential dynamic pricing program in Maryland and Delaware. BGE operates a similar residential dynamic pricing program in Maryland.

⁴ This rebate rate is identical for BGE, Pepco, and Delmarva Power customers to avoid regional customer confusion due to the overlapping media markets. The rate was originally based on the long-run cost of the Net Cost of New Entry for generating units in PJM or the long-run marginal cost of PJM market capacity. Note that under microeconomic theory in a competitive market, marginal cost = marginal price.

comparison of each customer's energy consumption during Savings Events compared with each customer's individually calculated customer baseline load ("CBL").⁵ Pepco selects dynamic pricing events based on expected electricity demand, local and regional electric grid constraints, PJM dispatcher requests, Pepco Maryland PJM wholesale market Locational Marginal Prices ("LMP") for electricity and required testing. Pepco notifies customers of PESC events the day before via their choice of email, text, and/or phone call. During the period of 2013 through the summer of 2019, an average of 485,000 Pepco Maryland residential customers were eligible for dynamic pricing and an average of 366,000 or 75% of residential customers achieved energy reductions during each event. The average residential rebate per event was \$4.78 and collectively residential customers have earned \$38.3 million in distribution bill credits. The average peak load reduction achieved during the period of 2013 through 2019 was 126 MW as measured by regression modeling. Typical PESC events take place over a 4-hour period between 2 pm and 6 pm on weekday summer afternoons, although events may take place during any time of the year.

Pepco places the Maryland PESC reductions into the PJM capacity market Base Residual Auction ("BRA") as a demand-side resource in order to derive supportive revenues from the PJM wholesale market. Existing PJM market rules currently require the PESC Program to be placed in the PJM market as Price Responsive Demand ("PRD") and be matched with the Company's Energy Wise Rewards ("EWR") Program. The EWR Program is Pepco's direct load control program ("DLC") for central air conditioner and heat pump compressors that relies on smart thermostats and direct load control switches in both Maryland and the District of Columbia.⁶ Pepco has established PJM capacity market positions for dynamic pricing totaling \$41.9 million

⁵ Individual CBLs are automatically calculated by Pepco and are available to customers on the morning of each PESC event. The Pepco Maryland residential CBLs are calculated as the average of each individual customer's use during similar hours for the three weekdays with the highest use during the prior 30-day period.

⁶ In the District of Columbia, this program is also referred to as a Direct Load Control ("DLC") program.

during the PJM Delivery Years of 2014/2015 through PJM Delivery Year 2021/2022. The Company will establish future capacity market positions in the next BRAs that are held by PJM and are expected to take place later in 2020. Pepco also derives supportive energy market revenues from the PJM wholesale market. To date the Company has received \$71,864 in energy market earnings for the program. Pepco continues to actively work with PJM to identify wholesale market opportunities for the PESC Program and to evaluate whether customer benefits will be greater over future years on either the supply-side of the market (actively bid into the market) or on the demand-side of the market (reduction in the PJM capacity obligation for the Zone).

Pepco, Delmarva Power, and BGE have established an annual “true-up” mechanism to balance annual PJM market earnings with dynamic pricing bill credits. Available PJM market earnings and customer dynamic pricing bill credits flow through the existing EmPOWER Maryland surcharge on an annual basis. In this way, all PJM market revenue is credited to distribution customers.

In Maryland Pepco activates its EWR Program concurrently when PESC Program events take place. In this way, EWR Program savings and PESC Program savings collectively produce higher savings than the programs would individually. PESC bill credits that exceed the established monthly EWR credit amounts are provided by Pepco to EWR participants in Maryland. In the Delmarva Power Delaware service territory, EWR bill credits are entirely based on the calculated PESC Program because the PESC Program was established prior to the availability of the EWR Program. In the Pepco Maryland service territory, the EWR Program (including its monthly bill credits) was created before the PESC Program was implemented. The state regulatory commissions in both Maryland and Delaware determined which program was approved first.

Other Forms of Dynamic Pricing

Other forms of dynamic pricing have been implemented by electric distribution companies. For example, Pepco's affiliated utility in Illinois, Commonwealth Edison Company ("ComEd"), established a different form of opt-in residential dynamic pricing in 2007. ComEd's Hourly Pricing Program provides real-time hourly pricing to 29,327 residential customers who have opted into the program and saved \$19.7 million during the 2007 through 2018 period. Other forms of residential dynamic pricing include day-ahead hourly pricing based on the PJM wholesale market. A day-ahead pricing program, "Power Smart Pricing," is currently offered by Ameren in Illinois to 13,218 residential customers who have opted into the program and saved \$11.4 million during the 2007 through 2018 period. Each form of residential dynamic pricing offers different benefits.

District of Columbia Residential Dynamic Pricing Proposal

The Company will recommend to the RDWG that a Critical Peak Rebate dynamic pricing rate be established and be applicable to all District of Columbia Pepco residential distribution customers. After discussions with the RDWG, the recommended dynamic pricing rate will be submitted to the Commission and be subject to its approval. The proposed rate is designed to give all residential customers a strong and easily understood incentive to reduce electricity use during specified times that poses no risk of higher electricity bills if a customer chooses to ignore the price signal. Pepco proposes to market the dynamic pricing rate under the PESC name to avoid residential customer confusion between its Maryland and District of Columbia customers and media markets.

Implementing similar dynamic pricing programs in the District of Columbia and Maryland offers Pepco and its customers numerous advantages: 1) it will greatly simplify Pepco customer communications and help to avoid customer confusion within the region; 2) it will minimize the

number of required Pepco billing system modifications; 3) it will simplify and reduce the cost of Pepco staff training; and 4) it will reduce the complexity of the interface of dynamic pricing rates with the PJM wholesale electricity market.

Rebate Amount

Pepco recommends applying the same rebate rate established by Pepco, Delmarva Power, and BGE -- \$1.25 per kWh reduced to avoid customer confusion and simplify customer education efforts. Under the PESC Program, the distribution portion of a customer's bill is modified by a credit calculated by applying the bill credit amount of \$1.25 to the difference between actual kWh consumption and the CBL level of consumption during the Peak Savings period designated by the Company. As an example, a customer who saves 5 kWh during the Peak Savings event would receive a bill credit of $\$1.25 * 5 \text{ kWh} = \6.25 . There will be no penalty if a customer's usage is above the CBL. All energy use, including the kWh actually consumed during PESC events, will be priced at the normally applicable distribution and generation rates.

The available credit level is a key factor in the attainment of demand reductions because the credits paid to customers are an important factor in customer engagement. Thus, the credit level must be sufficient to attract and retain customers' interest in changing their behavior during Savings Events. This is particularly true at the beginning of a new program when customers will expect to earn rebates if they have modified their behavior. If the baseline level is too low, customers may not receive rebates sufficiently high to motivate behavior change in the future.

Operational Season

Dynamic pricing will operate throughout the year. However, Pepco does not anticipate typically calling savings events outside of the summer. The majority of Savings Events will occur during summer weekday afternoons due to the high electricity loads that result from the use of air

conditioning to alleviate high temperature and humidity conditions. Similar to its activities in Maryland, Pepco plans to bid the dynamic pricing rebate programs into the PJM capacity market. The Company will continue to evaluate whether customer benefits will be greater if the program is relied on to reduce zonal capacity obligations rather than actively bid into the PJM market. PJM will rely upon hourly integrated data from AMI meters to measure compliance.

Event Times

Pepco proposes that the applicable times mirror the current PJM market rules regarding demand response resources that are placed into the PJM capacity market. Therefore, the Company proposes that for PJM-declared emergencies,⁷ the available Peak Savings times match the required PJM times. Events may take place at any time during the year but are most likely to take place during the noon to 8 pm period on summer weekdays. Typically, Pepco Maryland and District of Columbia dynamic pricing events will occur at the same time, but different activations could occur in response to localized grid conditions or program testing needs. There may also be days when start and end times differ.

Frequency

Pepco recommends that Peak Savings events be called for a minimum of four days per summer season to keep customers conditioned to responding whether or not the events are required by PJM or necessary based upon local grid conditions. Pepco anticipates that it will call a minimum of four and a maximum of fifteen Peak Savings events per summer. PJM capacity

⁷ For a listing of all PJM-declared emergencies since 1991 in which demand response resources were called, see http://www.pjm.com/planning/resource-adequacy-planning/~/_media/planning/res-adeq/load-forecast/alm-history.ashx.

market revenue does not vary based upon the number of events that occur; however, any PJM energy market earnings will be based upon actual events.

Duration

Pepco proposes that the duration of Peak Savings events be consistent with PJM market rules. Pepco proposes that for PJM-declared emergencies, the duration of each Peak Savings event will match or exceed the length of the PJM emergency event. Pepco believes that the effectiveness of each Peak Savings event will be based upon the duration of each event and more consistent results will be achieved with an event window shorter than 8 hours. It is likely that customers will respond more frequently and/or with greater impact to events that are less than 8 hours, as it will be easier for customers to adapt to a shorter time period. For example, customers may decide to forgo cooking, using hot water for laundry, dishwashing and personal use, or running other appliances for events of a relatively short duration but may find it more difficult to continue to do so for a longer period of time. In Pepco's Maryland service territory, PESC events typically have a duration of four hours and take place during the hours of 2 pm to 6 pm.

Event Notification

Pepco will notify customers of an anticipated Savings Event by 9 p.m. on the day prior to an event, although unexpected same day emergency events may occur, limiting the ability to provide advance notice. Customers will receive an automated phone call, email, and/or text message, or combination thereof, notifying them that a Peak Savings event will occur on the following day. Customers may specify two notification preferences through Pepco's on-line tool, My Account. Customers who do not specify a notification preference will receive telephone notification of each event at the telephone number Pepco has on file. Customers may also contact

the Company's customer service center via a toll-free number for critical peak information or visit the Company website.

EWR Interaction

Pepco anticipates activating direct load control (EWR) events at the same time as PESC events. Customers who participate in the direct load control program will be eligible for additional PESC rebates that are in excess of monthly direct load control credits. The proposed rate tariff will reflect this credit treatment.

Educational Messaging

Pepco will develop an education campaign for the PESC Program in the District of Columbia. Messaging will be based on the Company's experience with the PowerCentsDC™, the District of Columbia dynamic pricing pilot program, and on its experience in its Maryland service territory.

The key objectives of the PESC education campaign include the following:

- To explain Pepco's PESC program clearly and simply, so customers will participate by reducing energy use during the designated hours on Peak Savings Days.
- To explain the difference between and benefits of the PESC and EWR programs. The EWR Program provides an enabling tool whereby Pepco can automatically reduce a residential customer's central air conditioner energy use, whereas the PESC Program permits each residential customer to reduce her energy use directly through their own actions.
- Encourage customers to enroll in My Account, Pepco's online account management and energy analysis tool, and learn about the many tools available that will help customers reduce and manage their electricity consumption.

- Help customers to understand that reducing peak usage on the hottest days of summer will help to reduce energy prices and ultimately reduce electric costs for all customers.

Exceptions to Applicability

Pepco customers who accept their electric supplier's dynamic pricing offer, or an offer from a Curtailment Service Provider ("CSP"), which has been monetized in the PJM market(s) or directly tracks PJM market prices, must be removed from the applicable utility dynamic pricing tariff to avoid any double counting and double payment of demand reductions. Under this proposal, it is assumed that PJM will rely on an approach for mass market customers that is similar to its existing approach for larger nonresidential customers. Specifically, the alternative supplier or CSP must first contact PJM in order to attempt to monetize load reductions into the PJM markets. PJM then works directly with the distribution utility to confirm the individual customer's eligibility to participate in the third-party program.

Timing of Dynamic Pricing Implementation

Pepco proposes to begin educating all of its District of Columbia residential distribution customers about the PESC Program during the second quarter of 2021 and will place all residential customers on the rate beginning on June 1, 2021. The proposed timing is contingent on discussions with the RDWG and submittal of a proposal to the Commission that is approved by year-end 2020. If Commission approval is provided later in time, program implementation would take place during 2022.

Program Costs and Proposed Recovery Method

Cost Impact

Pepco's incremental costs for the implementation of the proposed dynamic pricing critical peak rebate rate consists primarily of annual customer education expense, which is expected to range between \$500,000 to \$1.5 million depending upon the configuration of the campaign and the recommendations of the RDWG. There will be additional costs related to customer event notifications primarily related to additional telephone messaging. Pepco plans to rely on an expansion of the existing notification method relied on in Maryland. An estimate of this cost will be available after discussions with the existing telephone communications vendor takes place. If the rate form is not modified, additional Pepco IT billing related modification costs are expected to be minimal. However, if the dynamic pricing rate design is modified significantly, the cost of IT billing modifications will be more costly. Pepco will provide more detailed program cost estimates after discussions with the RDWG are completed and the final recommended form of dynamic pricing is developed.

Cost Recovery Method

Pepco proposes to recover the incremental costs of residential dynamic pricing through a distribution bill rider or surcharge that is adjusted annually and is designed to recover incremental program costs annually. An annual true-up adjustment filing would be made during the month of November and the resulting rate adjustment would be made effective with the billing month of January. The annual adjustment would be subject to Commission approval. Costs that would be recovered through the surcharge include: 1) incremental program implementation costs, 2) annual customer education costs, 3) event notification costs, and 4) annual customer bill credits. All PJM

market revenues would be credited back to customers through the rider or surcharge and could exceed program costs annually, depending on PJM market conditions.

Conclusion

Pepco looks forward to working with the RDWG to discuss its proposed residential dynamic pricing program with interested stakeholders over the next several months. Pepco will rely on the feedback from the RDWG to refine and improve its residential dynamic program and to submit the final proposal to the Commission for its consideration. The revised filing will include a proposed residential dynamic pricing rate tariff, sample Pepco residential bills, sample educational materials, and refined program incremental cost estimates. The timing of Pepco's final dynamic pricing proposal will be determined through discussions with the RDWG.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Residential Dynamic Pricing Program Proposal was sent to all parties on April 23, 2020 by electronic mail.

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