

E-Docketed

May 5, 2020

BY ELECTRONIC FILING

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
1325 G Street, NW, Suite 800
Washington, DC 20005

**Re: Formal Case No. RM-40-2020-01 and 1050
DC Climate Action Response to
Pepco 5-04-2020 Motion for Enlargement of Time**

Dear Ms. Westbrook-Sedgwick,

Please find enclosed for filing DC Climate Action's response to Potomac Electric Power Company's Motion for Enlargement of Time in the above referenced proceeding.

Please contact me if you have any questions. Thank you.

Respectfully,

s/Nina Dodge

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cc: service list

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

In the matter of 15 DCMR Chapter 40- District of Columbia Small Generator Interconnection Rules)))	Formal Case No. RM-40-2020
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In the Matter of the Investigation of Implementation of Interconnection Standards in the District of Columbia)))	Formal Case No. 1050
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**DC CLIMATE ACTION’S
OBJECTION**

I. INTRODUCTION

On April 10, 2020, the Public Service Commission of the District of Columbia (“Commission”) issued a Notice of Proposed Rulemaking (“NOPR”) seeking comment on revisions to the current small generator interconnection rules in 15 DCMR, Chapter 40 and stating that initial comments are due on May 8, 2020. On May 4, 2020, Potomac Electric Power Company (“Pepco”) filed a Motion for Enlargement of Time to File Comments (“Motion”).¹

II. BACKGROUND

DC Climate Action (“DCCA”) is a non-profit civic association that advocates for policies in the District of Columbia that promote clean, affordable and reliable energy for

¹ <https://edocket.dcpsc.org/apis/api/filing/download?attachId=103426&guidFileName=e4d8107b-34ca-4a6e-90e1-e34597df0b49.pdf>

all of DC, and that mitigate climate global warming by reducing greenhouse gas emissions.²

DCCA has brought climate-related clean energy issues in electricity cases before the Commission and advocated for a planned stakeholder approach to modernizing the District's electric grid for clean, efficient sustainable energy for almost a decade. We were one of the intervenors cited in the Commission's launching of the MEDSIS Formal Case 1130 proceeding, and have played a leading public role in this Commission stakeholder initiative to this day. In the MEDSIS Working Group phase of the FC 1130 proceeding, DCCA led on the issue of the deployment of the IEEE 1547-2018 Standard for advanced inverters, stressing the importance of the new functionalities of inverters to meeting the District's clean energy goals, by expanding the District grid's hosting capacity for distributed energy resources ("DERs") as well as DER benefits to the grid, and the importance of a transparent holistic planning process for integrating these new functionalities into the grid. Now in the context of the Clean Energy DC Omnibus Amendment Act of 2018, planning the specifics needed to meet the District's Clean Energy goals for 2032 and 2050 has never been so urgent.

III. OBJECTION

² DCCA has participated consistently in Commission proceedings relating to energy delivery policy for sustainability for over 7 years, including Formal Case ("FC") 1053, FC 1086/1109, FC 1114, FC 1116, FC 1123, and FC 1130, 1150. DCCA member Nina Dodge served on Grid2.0/Sierra-DC's intervention team on Pepco's rate case, FC 1103, DCCA not being an intervenor in that case *per se*. DCCA expanded its participation to natural gas regulation, by intervening in FC 1137, in FC 1115 and FC 1154.

Note: DCCA was originally called the Politics & Prose Climate Action Project. It adopted its current name in February 2013.

DCCA objects to the delay of over nine weeks requested by Pepco for the reasons below.

1. In defense of its Motion, on page 2, Pepco states, *inter alia*, that:

“no party or person participating in this proceeding is prejudiced by the delay because it applies equally to all participants.”

While such a delay indeed would apply equally to all participants, DCCA believes the issue of prejudice here is not whether all parties would be delayed equally in filing, but whether a delay in resolving the matters at issue in the NOPR would have a negative impact on any of the parties or on the public good, and in this case, on meeting the District’s clean energy goals. DCCA believes that the lengthy requested delay would indeed further delay achievement of the District’s clean energy goals.

Under “Background” in Section 1 above, we point to the importance and urgency of a holistic grid planning process for meeting the District’s clean energy mandates.

Planning for the deployment of advanced inverter functionalities under the IEEE 1547-2018 standards is an essential aspect of this. A nine-week delay in comments on the NOPR would set off a chain of further delays in finalizing an acceptable NOPR. This in turn would cause delays in resolving issues that relate to the integration of advanced inverter functionalities and therefore in achieving the District’s clean energy goals, which affect the welfare of everyone in the District and beyond.

(2) In defense of its Motion, on page 2, Pepco further states, that:

“Pepco continues to complete interconnection requests throughout the NOPR period

and continues to work with the District Department of Energy and Environment and developers to streamline interconnection for Community Renewable Energy Facilities where possible.”

DCCA is aware of the major obstacles facing developers in getting Community Solar projects interconnected and unresolved interconnection issues in the multi-year discussions that have taken place under the aegis of the Commission. These issues have held the District back in achieving its mandatory solar carve out targets and prejudiced the health of the solar industry in the District. DCCA’s view is that the lengthy delay requested by Pepco would unjustifiably retard the resolution of these issues by the NOPR.

IV. CONCLUSION

For the reasons above, DCCA objects to the delay of over nine weeks requested by Pepco.

Respectfully submitted,

s/John Macgregor

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DATED: May 5, 2020

CERTIFICATE OF SERVICE

We, the undersigned, certify that on this 5th day of May, 2020, DC Climate Action's Objection was served on the parties listed below via the District of Columbia Public Service Commission's e-filing system and by electronic mail:

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