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September 3, 2020

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite 800
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Re: Formal Case No. 1130

Dear Ms. Westbrook-Sedgwick:

On June 5, 2020, the Public Service Commission of the District of Columbia (“Commission”) issued Order No. 20364, noting that the Commission is “encouraged by, and very interested in, Pepco’s plans to develop [non-wires alternative (NWA)] demonstration projects outside the PowerPath DC Pilot Project funding system.” Order No. 20364 directed Potomac Electric Power Company (“Pepco” or the “Company”) to “inform the Commission in more detail of these proposed projects by filing a report with the Commission on the status of these projects.”¹ Specifically, the Commission directed Pepco to address the following questions:

(1) What is the planned funding source of such possible NWA demonstration projects?; (2) What are the unique features such a demonstration project will provide to justify a program implemented outside the PowerPath DC Pilot funding system?; (3) A full discussion of the anticipated reliability/resilience benefits from such a demonstration project; (4) Whether Pepco plans to implement such a project in a constrained area?; and (5) Whether Pepco plans to include this in the first NWA selection process? Given Pepco has proceeded with the Distribution System Planning and Non-Wires Alternative process and hosted its first webinar on NWA/RFI in April 2020, such demonstration projects can participate in the NWA selection process.²

Pepco addresses these questions below in terms of: (1) The Company’s own NWA projects being pursued in response to Pepco’s reliability and distributed energy goals to

¹ *In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability*, Formal Case No. 1130, Order No. 20364 (Jun. 5, 2020) (“Order No. 20364”) at ¶ 72.

² *Id.*

maintain its system for the benefit of its customers and in response to Commission directives; (2) The proposed partnership with the District Department of Energy and Environment (“DOEE”) to develop a “solar saturation microgrid” demonstration project to aggregate customer solar with a utility-owned battery backup; and (3) Pepco’s Distribution System Planning for Non-Wires Alternatives (“DSP/NWA”) Process approved in Order No. 20286.³

A. Pepco Battery Storage Demonstration Projects

The Company is currently pursuing two Pepco-owned battery storage demonstration projects in the District of Columbia. The first is the battery storage project Pepco was directed to pursue in Order No. 20274⁴ to indefinitely defer the need for a fourth transformer at the new Mt. Vernon Substation. This is a longer-term project that will be implemented after the new Mt. Vernon Substation construction is completed. Pepco is currently performing a feasibility study that will inform its decision about the timing of installation of the Mt. Vernon Substation battery and its independent HVAC and fire protection. The feasibility study is expected to be completed by the end of 2020.

The second Pepco battery storage demonstration project is being pursued by Pepco in response to the Order No. 20274 directive for Pepco to “provide a preliminary assessment and implementation framework for battery energy storage deployment which may enable the new Substation deferral at Ward 8 (Alabama Avenue).”⁵ This project involves a battery storage project at the Congress Heights Substation in Ward 8. The need for the new Ward 8 substation is currently projected for 2029. Pepco will deploy a utility-owned 1-mega watt (“MW”), three-hour battery.⁶ This project will be deployed on an existing Pepco property at Congress Heights, avoiding costly property acquisition. Since the demonstration project is currently planned to be in-service in 2022, the learnings from this project will be important in informing future demonstration projects and NWA solutions selected through the DSP/NWA Process.

Responses to the Commission questions regarding Pepco-owned demonstration projects:

³ *In the Matter of the Investigation into Modernizing the Energy Delivery System for Increased Sustainability*, Formal Case No. 1130, Order No. 20286 (Jan. 24, 2020) (“Order No. 20286”).

⁴ *In the Matter of the Potomac Electric Power Company’s Notice to Construct Two 230kV Underground Circuits from the Takoma Substation to the Rebuilt Harvard Substation, and from the Rebuilt Harvard Substation to the Rebuilt Champlain Substation (Capital Grid Project)*, Formal Case No. 1144, Order No. 20274 (Dec. 20, 2019).

⁵ Order No. 20274 at ¶ 94.

⁶ Pepco discussed this battery project in the Capital Grid Project proceeding.

(1) What is the planned funding source of such possible NWA demonstration projects?

Pepco plans to fund these projects using its traditional combination of debt and equity, and include both battery storage demonstration projects in rate base. However, Pepco is in the process of monitoring for and assessing the applicability of grid modernization grants that may help defray the costs of these projects.

(2) What are the unique features such a demonstration project will provide to justify a program implemented outside the PowerPath DC Pilot funding system?

In accordance with the Commission's directive barring District utilities from pursuing PowerPath DC Pilot funding,⁷ Pepco will not apply for PowerPath DC Pilot funds. The battery storage projects described above will give the Company experience using utility-scale battery storage to defer the need for substation transformers and a new substation, thereby reducing costs to customers. These demonstration project will provide the Company with important learnings regarding procurement, engineering design, construction, and peak load shaving and deferral capabilities. The utility-scale battery storage projects will also provide reliability and resiliency benefits to the substations as further described below.

(3) A full discussion of the anticipated reliability/resilience benefits from such a demonstration project.

The substation transformer deferral projects described herein have not been assessed by Pepco for the extent of their reliability and resilience contribution. Pepco is basing the need for these projects on Commission directives, deferral of substation transformer investments, and to gain learnings about them as described above. Pepco will track the performance of the batteries as well as the reliability and resilience benefits gained from it after installation.

(4) Whether Pepco plans to implement such a project in a constrained area?

Yes. As demonstrated in Formal Case No. 1144, the area that the Mt. Vernon Substation will serve is constrained. Thus, the battery storage project at the Mt. Vernon Substation will be implemented in a constrained area. The new Mt. Vernon Substation battery storage project will be implemented according to the directive of the Commission and will defer the need for a 70 MVA transformer.

In addition, as Pepco has discussed in Formal Case Nos. 1130 and 1144, a new substation is forecasted to be necessary in Ward 8 in 2029. The Congress Heights

⁷ Order No. 20286 at ¶ 68. Pepco supported this recommendation in the PowerPath DC working groups.

Substation Battery Storage project will be part of the portfolio of projects implemented to address the need for a new substation in Ward 8. As a result, the Congress Heights Substation battery storage project will also be implemented to serve a constrained area.

(5) Whether Pepco plans to include this in the first NWA selection process?

No. Because these are utility-owned demonstration projects, they will be implemented outside of the DSP/NWA Process. In each case, these demonstration projects are being implemented based on Commission directives and are being implemented for the purpose of allowing Pepco to learn from the projects. If a utility-owned battery were part of the DSP/NWA Process, it likely would be a part of the utility solution to which third-party proposals are compared.

B. Pepco/DOEE Partnership to Develop a Ward 8 “Solar Saturation Microgrid”

Pepco and DOEE are currently exploring a project demonstrating a “Solar Saturation Microgrid” design, which is undergoing evaluation to ensure it can provide safe and reliable peak reduction on the order of 1-to-2 MW. This demonstration project, referenced in Order No. 20364,⁸ involves a utility-owned battery and third party-owned generation to aggregate the solar production of a group of residential customers. DOEE and Urban Ingenuity first presented this demonstration in the PowerPath DC Non-Wires Alternatives Working Group. This installation could be implemented by 2024, prior to the estimated 2029 need-date for capacity expansion in Ward 8. Installing the Solar Saturation Microgrid well before the need date allows Pepco to perform simulated loading events to gain experience with using the microgrid as a load-shaving resource during peak loading periods. Positive results could lead to replication of the design at additional sites in Ward 8 and elsewhere in Pepco’s service territory, contributing to further capacity expansion deferral and resiliency.

Responses to the Commission regarding the Pepco/DOEE proposed demonstration project:

(1) What is the planned funding source of such possible NWA demonstration projects?

Pepco plans to fund these projects using its traditional combination of debt and equity, and to place the utility-owned portions of this project in rate base. Pepco is in the process of monitoring for and assessing the applicability of grid modernization grants that may help defray the costs of this project. The third-party-owned portions of the project will be funded through financing arrangements that do not involve Pepco.

⁸ Order No. 20364 at ¶¶ 69-72.

(2) What are the unique features such a demonstration project will provide to justify a program implemented outside the PowerPath DC Pilot funding system?

Per Commission Order No. 20286, Pepco is not eligible to apply for PowerPath DC Pilot funding.

(3) A full discussion of the anticipated reliability/resilience benefits from such a demonstration project.

This project is still in the preliminary assessment stages, and the reliability/resiliency benefits have not been assessed by Pepco for the extent of its reliability and resilience contribution. However, the benefits of the distributed solar generation aggregated from multiple residential customers, battery-storage backup, and microgrid islanding capability are expected to demonstrate reliability and resiliency benefits for the residential customers and community in which this project is implemented. Pepco will track the performance of the battery as well as the reliability and resilience benefits gained from the battery storage and microgrid after installation.

(4) Whether Pepco plans to implement such a project in a constrained area?

Yes. The new the Solar Saturation Microgrid project is being implemented in part to defer the long-term need for a new substation in Ward 8.

(5) Whether Pepco plans to include this in the first NWA selection process?

No. Pepco and DOEE are pursuing this project in partnership as a demonstration of solar aggregation and microgrid resiliency and not including it in the DSP/NWA Process.

C. DSP/NWA Process Update

In February 2020, Pepco filed its revised timeline for implementation of the DSP/NWA Process. As part of the revised timeline, Pepco committed to update the Commission on its progress implementing DSP/NWA Process milestones for the pilot year of the program. In this first year, the Company is focused on developing a transparent process that provides a level playing field to evaluate solutions capable of deferring planned utility investments. Any solution selected through the process will be required to maintain the safe, reliable, and cost-effective service provided by Pepco.

On June 1, 2020, Pepco held its second workshop regarding the DSP/NWA Process: Utility & Stakeholder Locational Constraints Report Preparation. The workshop was well attended, with approximately 12 organizations represented. After reiterating background on the load forecasting methodology and the importance of load impacting factors, Pepco discussed the Locational Constraints Report. The Locational Constraints Report reflects the capacity constraints that are the subject of the DSP/NWA Process for

that year. Each of the constraints in the Locational Constraints Report will be the subject of an RFP in the current DSP/NWA Process cycle. The constraints may require either a single RFP in the current cycle or may be the subject of multiple RFPs over multiple DSP/NWA Process cycles. On June 18, 2020, Pepco held a follow-up workshop with interested stakeholders to explain the content and format of the Locational Constraints Report. On August 10, Pepco issued the Locational Constraints Report and Request for Information (“RFI”) for distributed energy developers and other stakeholders to propose solutions for Pepco’s consideration for inclusion in the final RFP.

The locational constraint identified in the report is a substation forecasted to exceed 5 percent of its existing transformers’ firm capacity by 2026, a timeframe that allows enough time to conduct a robust RFP process.⁹ The original solution to address this constraint is to install the fifth transformer that was planned for the substation. During this pilot year of implementing the DSP/NWA Process, approximately ten constraints were identified by Pepco, validating the robustness of the locational constraint process and criteria. As expected with the initial implementation of the DSP/NWA process, most of the identified constraints were already being addressed by Pepco because they were near-term constraints. These projects were deemed ineligible because either (1) the timing for the need was insufficient for consideration and construction had already begun, or (2) the integrated Capital Grid Project upgrades addressed the constraint. The Company will rely on the short-term system recommendations (completed in February of each year) and long-term system recommendations (completed in May of each year) to align its load forecasting and project planning with the new process, and, therefore, Pepco expects to offer more opportunities in future iterations of the DSP/NWA Process. This approach is consistent with Pepco’s responsibility to implement the DSP/NWA Process while maintaining system integrity, minimizing costs passed on to customers, and providing DER developers with opportunities to propose solutions to meet system needs.

In response to the RFI, the Company has thus far received follow-up questions from ten DER developers. Responses to the RFI by interested parties are due by September 10, 2020.

On October 1, 2020, Pepco will hold its third workshop on the RFP response format, NWA contracting, and engagement between local and national respondents. In this workshop, Pepco will discuss the RFP, associated contracts, and the Benefit-Cost Analysis (“BCA”) Handbook. When complete, the BCA Handbook and other documents associated with the RFP will be provided to stakeholders. Pepco will use input from the RFP workshop to inform the final RFP, which will be issued on November 1, 2020. NWA RFP respondents will submit their responses no later than February 1, 2021.

Pepco has been encouraged by the stakeholder engagement in workshops, the Load Impacting Factors RFI, and the Locational Constraints RFI. The Company looks forward

⁹ See *Pepco’s Update on the Distribution System Planning for Non-Wires Alternatives Process, Formal Case No. 1130* (Aug. 7, 2020).

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to continued stakeholder engagement in the last workshop in October and, most importantly, in the RFP process. The Company believes that the RFP represents the culmination of the DSP/NWA Process, which is the result of the concerted efforts of Pepco, the Commission, and the District of Columbia stakeholders.

Continued Commission action may be needed to enable the innovative approaches to manage constraints included in the DSP/NWA Process, and the traditional regulatory approach for cost recovery will need to be aligned to enable novel approaches. In some cases, for example, a given solution could involve an independent operator of solar and storage assets contracting with Pepco for peak demand reduction services via a long-term agreement. In such cases, a cost recovery methodology could include both an incentive framework to align outcomes and address risk embedded in the adoption of novel solutions and rate base treatment for resulting contracts. In addition, as the BCA requires the comparison between a utility solution and any proposed NWA solution, Pepco will be required to complete the design for the utility solution. In order to be able to properly recover for that design, Pepco will require Commission action specifically allowing for capital recovery of the design.

Pepco looks forward to continuing to work with the Commission and stakeholders to establish a robust DSP/NWA Process that builds upon the important lessons learned from this first cycle.

Please contact me if you have any further questions.

Sincerely,

/s/ Andrea H. Harper

Andrea H. Harper

Enclosures

cc: All Parties of Record

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's NWA Strategy Update was sent to all parties on September 3, 2020 by electronic mail.

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