

Sandra Mattavous-Frye, Esq.
People's Counsel

September 4, 2020

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Mr. Christopher Lipscombe
General Counsel
Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Re: Formal Case No. 1156, In the Matter of the Application of the Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia

Dear Ms. Westbrook-Sedgwick and Mr. Lipscombe:

In preparation for the September 10, 2020 Technical Conference that is being held pursuant to Order No. 20617,¹ the Office of the People's Counsel for the District of Columbia (OPC or the Office), the statutory representative of District of Columbia ratepayers with respect to utility matters,² respectfully writes to seek clarification on, and provide OPC's plans with respect to, certain procedural aspects of the conference.

First, pursuant to Order No. 20617, the Technical Conference is intended "to allow all parties and the Commission Staff to fully examine the underlying data and workpapers associated with the billing determinant Errata," "to discuss Pepco's corrected billing determinants Errata and workpapers associated with Pepco's Supplemental Testimony," and for Pepco to provide "detailed explanations" about impacts of Pepco's data errors on various issues. As this information is pertinent to the record, OPC respectfully requests that the Commission or Pepco arrange for the technical conference to be transcribed.³

¹ *Formal Case No. 1156, In the Matter of the Application of the Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia*, Order No. 20617, rel. Aug. 21, 2020.

² D.C. Code § 34-804 (Lexis 2019).

³ As the error was caused by Pepco, Pepco should bear the costs of the transcription.

Furthermore, to the extent Pepco or any other party plans to provide materials regarding the impact of the errata on the case, OPC requests that these materials be provided to all parties and Commission staff by Tuesday September 8, 2020 to allow parties time to review the materials prior to the meeting and be better prepared to discuss the issues.

As discovery is currently closed in this proceeding,⁴ OPC plans to present by COB September 8, 2020 Pepco and AOBA⁵ with preliminary requests that the Office would like the parties to address at the conference. OPC requests that Pepco and AOBA be prepared to bring to the conference any information necessary to address these requests.

Order No. 20617 is silent as to how the Commission plans to address the Joint Motion after the Technical Conference has been conducted. As such, OPC plans to file within three business days after the conclusion of the conference, a letter outlining what was discussed at the Technical Conference and whether the discussion allays any of the concerns OPC set forth in its August 11, 2020 Joint Motion regarding the impact of Pepco's errata filing on Pepco's Application.

OPC looks forward to the PSC's response to the issues outlined above. If there are any questions regarding this matter, please contact Anjali Patel at apatel@opc-dc.gov. Thank you for your prompt attention to this matter.

Respectfully submitted,

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⁴ *Formal Case No. 1156*, Order No. 20375, Attachment A, rel. July 8, 2020 (ending discovery on July 15, 2020).

⁵ On July 31, 2020 PSC staff issued Data Request 3 to AOBA which inquired among other things, about the impact of Pepco's revised rate designs and billing determinants on the increases/decreases on the distribution portion of the customers bills. AOBA responded to a portion of these requests on August 7, 2020.

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cc: Parties of Record

CERTIFICATE OF SERVICE

Formal Case No. 1156, *In the Matter of the Application of Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia*

I certify that on September 4, 2020 a copy of the *Office of the People's Counsel for the District of Columbia Letter Regarding the September 10, 2020 Technical Conference* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

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