

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL**

**KARL A. RACINE
ATTORNEY GENERAL**



**Public Advocacy Division
Social Justice Section**

E-Docketed

October 26, 2020

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

Re: 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.

Dear Ms. Westbrook-Sedgwick:

On behalf of the District of Columbia Government (DCG), I enclose for filing DCG's List of preliminarily marked Cross Examination Exhibits for the evidentiary hearing to be held on October 27, 2020. If you have any questions regarding this filing, please contact the undersigned.

Sincerely,

KARL A. RACINE
Attorney General

By: /s/ Brian Caldwell
BRIAN CALDWELL
Assistant Attorney General
(202) 727-6211 – Direct
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cc: Service List

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

In the Matter of the Application of Potomac Electric Power Company For Authority to Implement a Multiyear Rate Plan for For Electric Distribution Service in the District of Columbia)))))	Formal Case No. 1156
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**CROSS-EXAMINATION EXHIBIT LIST
OF THE DISTRICT OF COLUMBIA GOVERNMENT
OCTOBER 27, 2020**

Exhibit No.	Description	Date Identified	Date Admitted	Admitted Exhibit #
Kevin McGowan				
DCG-1	Pepco Response to DCG DR 1-2			
DCG-2	Pepco Response to DCG DR 1-5			
DCG-3	Pepco Response to DCG DR 1-6			
DCG-4	Pepco Response to DCG DR 1-7			
DCG-5	Pepco Response to DCG DR 1-14			
DCG-6	Pepco Response to DCG DR 1-25			
DCG-7	Pepco Response to DCG DR 1-28			
DCG-8	Pepco Response to DCG DR 1-29			
DCG-9	Pepco Response to DCG DR 1-32			
DCG-10	Pepco Response to DCG DR 1-40			
DCG-11	Pepco Response to DCG DR 4-1			
DCG-12	Pepco Response to DCG DR 4-3			
DCG-13	Pepco Response to DCG DR 4-7			
DCG-14	Pepco Response to DCG DR 5-32			
DCG-15	Pepco Response to DCG DR 6-2			
DCG-16	Pepco Response to DCG Follow-UP DR 6-9			
DCG-17	Pepco Response to DCG Follow-Up DR 6-10 w/ Attachment			
DCG-18	Pepco Response to DCG DR 6-13			
DCG-19	Pepco Response to DCG DR 6-14			
DCG-20	Pepco Response to DCG DR 8-8			

Exhibit No.	Description	Date Identified	Date Admitted	Admitted Exhibit #
DCG-21	Pepco Response to DCG DR 8-18 (supplemental)			
DCG-22	Pepco Response to DCG DR 8-19			
DCG-23	Pepco Response to DCG DR 8-20			
DCG-24	Pepco Response to DCG DR 8-21			
DCG-25	Pepco Response to DCG DR 8-22			
DCG-26	Pepco Response to DCG DR 9-11			
DCG-27	Pepco Response to DCG DR 11-1			
DCG-28	Pepco Response to DCG DR 11-2			
DCG-29	Pepco Response to DCG DR 11-3			
DCG-30	Pepco Response to DCG DR 11-4			
DCG-31	Pepco Response to DCG DR 11-5			
DCG-32	Pepco Response to DCG DR 11-8			
DCG-33	Pepco Response to DCG DR 11-9			
DCG-34	Pepco Response to DCG DR 11-10			
DCG-35	Pepco Response to DCG DR 11-12			
DCG-36	Pepco Response to DCG DR 11-14			
DCG-37	Pepco Response to OPC DR 12-10			
DCG-38	Pepco Response to OPC DR 12-20			
DCG-39	Pepco Response to OPC DR 12-26			
DCG-40	Pepco Response to PSC DR 2-22			
Tyler Wolverton				
DCG-41	Pepco Response to DCG DR 1-6			
DCG-42	Pepco Response to DCG DR 1-14			
DCG-43	Pepco Response to DCG DR 1-26			
DCG-44	Pepco Response to DCG DR 1-33			
DCG-45	Pepco Response to DCG DR 1-36			
DCG-46	Pepco Response to DCG DR 1-39			
DCG-47	Pepco Response to DCG DR 4-8			
DCG-48	Pepco Response to DCG Follow-Up DR 4-11			
DCG-49	Pepco Response to DCG DR 6-7			
DCG-50	Pepco Response to DCG DR 6-15			
DCG-51	Pepco Response to DCG DR 8-2			
DCG-52	Pepco Response to DCG DR 8-3			
DCG-53	Pepco Response to DCG DR 9-1			
DCG-54	Pepco Response to DCG DR 9-2			
DCG-55	Pepco Response to DCG DR 9-4			
DCG-56	Pepco Response to OPC DR 58-1			
Bryan Clark				
DCG-57	Pepco Updated Response to DCG DR 5-17			
DCG-58	Pepco Updated Response to DCG DR 5-18			
DCG-59	Pepco Updated Response to DCG DR 5-36			

Exhibit No.	Description	Date Identified	Date Admitted	Admitted Exhibit #
DCG-60	Pepco Updated Response to DCG DR 5-73			
DCG-61	Pepco Response to DCG DR 7-2			
DCG-62	Pepco Response to DCG DR 7-4			
DCG-63	Pepco Response to DCG DR 5-1			
DCG-64	Pepco Response to DCG DR 5-19			
DCG-65	Pepco Response to DCG DR 5-24			
DCG-66	Pepco Response to DCG DR 5-26			
DCG-67	Pepco Response to DCG DR 5-28			
DCG-68	Pepco Response to DCG DR 5-29			
DCG-69	Pepco Response to DCG DR 5-30			
DCG-70	Pepco Response to DCG DR 5-31			
DCG-71	Pepco Response to DCG DR 5-34			
DCG-72	Pepco Response to DCG DR 5-39			
DCG-73	Pepco Response to DCG DR 5-41			
DCG-74	Pepco Response to DCG DR 12-4			
DCG-75	Pepco Supplemental Response to DCG DR 10-12			
DCG-76	Pepco Supplemental Response to DCG DR 10-13			
DCG-77	Pepco Response to DCG DR 6-1			
DCG-78	Pepco Response to DCG DR 10-11			
DCG-79	Pepco Supplemental Response to DCG DR 8-4			
DCG-80	Pepco Response to DCG DR 4-22			
DCG-81	Pepco Response to DCG DR 4-25			
William Zarakas				
DCG-82	Pepco Response to DCG DR 1-27			
DCG-83	Pepco Response to DCG Follow-Up DR 9-4			
DCG-84	Pepco Response to DCG Follow-Up DR 9-5			
Tammy Sanford				
DCG-85	Pepco Response to DCG Follow-Up DR 3-2			
DCG-86	Pepco Response to DCG Follow-Up DR 3-35			
DCG-87	Pepco Response to OPC DR 31-39 w/ CONFIDENTIAL Attachment A			
DCG-88	Pepco Response to DCG DR 3-6			
DCG-89	Pepco Response to DCG DR 3-13			
DCG-90	Pepco Response to DCG DR 3-14			
DCG-91	Pepco Response to DCG DR 3-17			
DCG-92	Pepco Response to DCG DR 3-23			
DCG-93	Pepco Response to DCG DR 3-24			
DCG-94	Pepco Response to DCG DR 3-26			
DCG-95	Pepco Response to DCG DR 3-28			

Exhibit No.	Description	Date Identified	Date Admitted	Admitted Exhibit #
DCG-96	Pepco Response to DCG DR 3-37			

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 17

Refer to PEPSCO (I)-1, Table 1: Historical District of Columbia Load by Ward, on pages 9-10.

- A. By Ward and substation, provide actual new load from what were “Prospective New Businesses” for each year 2013 through 2018 (inclusive).
- B. By Ward and substation, provide actual MVA or MW of load reductions from distributed generation for each year 2013 through 2018 (inclusive).
- C. By Ward and substation, please provide actual MVA or MW of load reductions from energy efficiency for each year 2013 through 2018 (inclusive).

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020.

UPDATED RESPONSE:

Pepco provides this response pursuant to Order No. 20328.

A – C. The requested study by Ward has not been performed.

UPDATED REQUEST:

Referring to DCG DR 5-17(A-C), DCG requested this information by ward and substation. Clarify if Pepco has this information by substation. If the answer is yes, provide the data as originally requested.

PEPCO’S UPDATED RESPONSE:

- A. The requested study has not been performed.
- B. This study has not been and cannot be performed. In most cases, Pepco only receives “net” generation produced by distributed generation.
- C. Pepco does not have actual load reduction information due to energy efficiency for two main reasons. First, the DCSEU has not provided – despite numerous requests, formal and informal- Pepco with energy efficiency data on a feeder by feeder basis for the measures it has employed. Second, Pepco’s load forecasting process will trend energy efficiency, but it will not be reported by each individual customer.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 18

Regarding Pepco's distribution planning process and peak load forecasts:

- A. By Ward and substation, provide Pepco's estimates regarding future new load from Prospective New Businesses for each year of the forecast.
- B. By Ward and substation, provide Pepco's estimates regarding the quantity of solar PV and storage that will be adopted by customers for each year of the forecast.
- C. By Ward and substation, provide Pepco's estimates regarding load reductions from energy efficiency programs (such as those implemented by the DCSEU) for each year of the forecast.
- D. By Ward and substation, provide Pepco's estimates regarding load reductions from new building codes and standards for each year of the forecast.

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020.

UPDATED RESPONSE:

Pepco provides this response pursuant to Order No. 20328.

- A. The requested study has not been performed.
- B. The requested study has not been performed.
- C. The Company has requested, since August 2017, and DCSEU has not provided the information requested.
- D. The Company does not estimate load reductions based on Ward and substation. Pepco is currently implementing enhancements to its load forecasting methodology that will take into account future energy efficiency gains.

UPDATED REQUEST:

- A. Referring to response to DCG 5-18(A), clarify if Pepco includes forecasts for new load from Prospective New Business by substation and/or by feeder? If, yes, provide the forecasted new load from Prospective New Business for each year of Pepco's forecasted

peak load (2019-2028) by substation and/or by feeder. If the requested data are not available, provide the data that most closely match that requested.

- B. Referring to response to DCG 5-18(B), clarify if Pepco includes forecasts for the quantity (MW) of solar PV and/or storage that will be installed in the District of Columbia for each substation or for each feeder? If no, at what system level does Pepco forecast the quantity (MW) of solar PV and/or storage?
- D. Referring to response to DCG DR 5-18(D), clarify whether Pepco does not include load reductions from new building codes and standards at all in its forecast, or whether Pepco includes such load reductions but does not estimate these reductions by Ward and substation?

PEPCO'S UPDATED RESPONSE:

- A. See FC 1156 DCG Follow-up DR 5-18 Confidential Attachment. Please note, however, that Pepco does not have all PNB information for each year of the 10-year forecast. For earlier years in the forecast, PNB information is used but for the later years, trending data is used.
- B. Pepco includes forecasts for the quantity (MW) of solar PV and/or storage that will be installed in the District of Columbia for each feeder. Please note, however, that Pepco does not have all DER information for each year of the 10-year forecast. For earlier years in the forecast, DER information is used but for the later years, trending data is used.
- D. Pepco includes load reduction through trending analyses. Also, refer to FC 1156 DCG Follow-up DR 5-17 part C.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 36

For each of Pepco's circuits in the District of Columbia, provide the peak day hourly load used for planning purposes and each circuit's rated capacity in a machine-readable Excel spreadsheet (i.e., in .xls or .xlsx format).

RESPONSE:

Pepco objected to this request in its notice of objections filed January 14, 2020.

UPDATED RESPONSE:

Pepco provides this response pursuant to Order No. 20328.

The requested study has not been performed.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 73

Is Pepco developing rules for DER islanding? If yes, provide any relevant documentation. If not, what are the barriers to creating such rules?

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020.

UPDATED RESPONSE:

Pepco provides this response pursuant to Order No. 20328.

The Commission has opened a new proceeding in Formal Case No. 1163. Pepco will actively participate in that proceeding and awaits the conclusion and determinations in that proceeding prior to developing DER islanding rules.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 7

QUESTION NO. 2

Referring to Pepco (J), page 5, lines 7-9, “In the immediate term, Pepco will need to make investments in its grid and incur other costs in order to meet the objectives of MEDSIS, the Clean Energy Act, and other goals concerning grid reliability and resilience,” list and provide the proposed budget in dollars for each of the proposed investments and other costs in the proposed MRP that meet the objectives of MEDSIS, the Clean Energy Act, and other goals concerning grid reliability and resilience. In your identification of each grid investment or other cost, state which objective the investment or cost is intended to achieve.

RESPONSE:

Please see Pepco’s response to FC 1156 DCG DR 5-11. For specifics regarding the projects and their budgets, please see Pepco (I)-2. Pepco notes that Figure 1 of DCG (A) (30:5-6) includes a list of grid modernization investments described by the US Department of Energy. This list includes many of the same types of investments as the projects included in Pepco (I)-2, including voltage regulation (*e.g.*, UORPORCPD), Distribution Automation (*e.g.*, UDLPRM4DJ), communications projects (*e.g.*, UOFPOF25D), and field telemetry devices such as Network RMS (*e.g.*, UORPORNPD).

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 7

QUESTION NO. 4

Referring to Pepco (I)-1, page 28 regarding the statement that capacitor automation results in reduced line losses:

- A. How does Pepco calculate line loss?
- B. Does Pepco currently track line losses on its system? If yes, provide this data for the past five years (2015 through 2019) in electronic Excel spreadsheet format.

RESPONSE:

- A. Pepco uses its Cymdist power flow analysis tool to calculate line losses when it is determined a capacitor needs to be added due to a predicted feeder voltage deficiency. The Cymdist program assists the planner in placing the capacitor in the best location to minimize losses while also solving the voltage issue.
- B. No, while Pepco uses Cymdist to determine losses for making decisions on capacity expansion, the Company does not keep track of line losses on its system. Rather, Pepco does use line losses in consideration for placement of new capacitors.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 1

Does Pepco currently have any agreements with customers in the District of Columbia who have battery storage to provide demand response or other grid services? If yes, describe such agreements.

RESPONSE:

No.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 19

Has Pepco updated the “Distributed Energy Resources and the Distribution System Planning Process” dated September 23, 2016? If the answer is yes, provide the updated version. If the answer is no, indicate whether Pepco is considering updating the document.

RESPONSE:

No. The Company is currently working on an updated document. The revised document is expected to be finalized in 2021.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 24

Refer to Pepco's Supplemental Response to FC 1156 Staff DR 3-6. The response indicates that the Total Resource Cost Test and the Societal Cost Test were used to assess the Pepco's Direct Load Control program.

- A. Provide a list of the benefits and costs that are currently used in the evaluation of NWAs.
- B. Does Pepco screen its NWAs using both the Total Resource Cost Test and the Societal Cost Test? If the answer is no, provide Pepco's rationale.

RESPONSE:

- A. Pepco considers multiple factors when evaluating NWAs. Primary factors include cost and reliability of the distribution grid.
- B. Pepco has historically screened demand-side management programs using the Total Resource Cost Test and the Societal Cost Test. NWA technologies also include such items as energy storage and microgrids. The NWA evaluation process is being refined to evaluate these new alternatives.

SPONSOR: Mike Poncia & Bryan Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 26

How many potential NWAs has Pepco evaluated in each of the past 5 years?

RESPONSE:

See FC 1156 DCG DR 5-26 Attachment for other potential NWAs the Company has evaluated in the District of Columbia for the past five years.

SPONSOR: Bryan L. Clark

BESS Projects

Pepco DC

ID	Jurisdiction	Type	Location	Size	Comments
1	Pepco DC	Load Shaving	Alabama Ave. Sub. 136 Feeder 15166	1 MW, 3 MWh	Demonstration Project to defer traditional solution - Unfavorable economics, but moving forward as a pilot
2	Pepco DC	Load Shaving	Mt Vernon 4th Transformer deferral	Approx 1 MW, 3 MWh	Project currently in Study Phase

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 28

Provide a list of all NWAs that Pepco has implemented in the past 5 years.

RESPONSE:

The Company has not implemented any NWA projects, though it has two energy storage projects in different phases of construction and design. See the response to FC 1156 DCG DR 5-26.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 29

If the Company is prepared to pursue the Distribution System Planning NWA process contingent upon Commission approval of the PowerPath DC recommendation, did it evaluate NWAs for any of the projects proposed in PEPCO (I)-2 using its current screening criteria? Explain the rationale for the decision.

RESPONSE:

The Company is prepared to pursue the DSP/NWA process filed in its September 16, 2019 comments in FC 1130 upon Commission approval. It will require one year to implement the stakeholder conferences, RFIs and RFPs. Because it has not been implemented yet, the Company did not use the process to evaluate NWAs for PEPCO (I)-2.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 30

Did Pepco consider proposing an NWA pilot using its proposed Distribution System Planning NWA process while it awaits approval of its NWA recommendation in PowerPath DC? Why or why not?

RESPONSE:

No. See the response to FC 1156 DCG DR 5-29 for information regarding the DSP NWA process.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 31

Does Pepco have a standardized contract for NWAs that DER service providers receive in advance of a Request for Proposals?

RESPONSE:

The Company does not currently have a standardized contract for NWAs that DER service providers receive in advance of a Request for Proposals.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 34

In addition to its hosting capacity map and heat map, does Pepco produce maps or data showing where DERs could be most beneficial in terms of reducing circuit loadings?

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020. Subject to that objection, Pepco provides the following response.

No. The Company does not currently calculate DER penetration in terms of “most beneficial,” however the proposed DSP NWA process would allow the Company to implement NWA solutions, including DERs to address long term system capacity needs.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 39

Has Pepco projected how much capacity can be avoided from the increased utilization of DERs in its service territory? If yes, provide this value.

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020. Subject to that objection, Pepco provides the following response.

No.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 5

QUESTION NO. 41

What investments would be required for Pepco to improve its real-time visibility on the system?

RESPONSE:

Pepco objected to this data request in its Objections filed on January 14, 2020. Subject to that objection, Pepco provides the following response.

The deployment of Advanced Distribution Management System (ADMS) is in the long-term plans of the Company.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 12

QUESTION NO. 4

Referring to Witness Clark's Surrebuttal Testimony on page 6, which indicates that "Pepco's capital projects fall into one of three categories: capacity (or load) projects, reliability projects, and customer-driven projects. The only projects for which Pepco uses the load forecast are capacity projects", answer the following:

- A. Explain how Pepco has modified its budget for capacity (or load) related projects in its MRP Enhanced Proposal due to the impacts of COVID-19.
- B. If the Company has not modified its budget for capacity (or load) related projects, explain why it has not done so.

RESPONSE:

- A. No modifications have been made to the budget for capacity (or load) related projects in the MRP Enhanced Proposal due to the impacts of COVID-19. See also Pepco's response to Staff DR 12-9.
- B. A decrease in load in the short term does not itself impact Pepco's capital spend. The need dates for capacity projects in the Construction Report are based on multi-year 90/10 forecasts that ensure that Pepco's distribution system will be able to withstand the worst peak conditions in 10 years, an industry standard for load forecasting. By looking at peak load and over a 10-year period, in keeping with best practices, the Company avoids planning its system to temporary load decreases which then causes the system to fail under harsh peak conditions. Please see Pepco's response to DCG DR 2-3 and the extensive discussion on 90/10 forecasting methodology in Company Witness Clark's Surrebuttal Testimony, pages 7-16.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 10

QUESTION NO. 12

Provide Pepco's monthly actual peak load by substation for each month of 2019. Provide this information as a working electronic spreadsheet.

RESPONSE:

The responses are not yet developed and will be provided as soon as possible.

SUPPLEMENTAL RESPONSE (June 3, 2020):

See FC 1156 DCG DR 10-12 Supplement Attachment.

SPONSOR: Bryan L. Clark

2019 District of Columbia Monthly Substation Peak Loads
Loads in Mega-Volt-Amperes (MVA)

Ward 1	Sub. Number	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	10	113.0	104.3	97.2	84.3	114.0	112.9	127.5	118.8	113.7	108.5	86.1	89.4
	13	31.6	30.7	26.8	25.0	29.2	27.8	33.6	31.0	28.4	29.7	23.5	27.1
	25	48.3	46.5	43.2	35.0	44.7	56.0	56.0	48.3	55.0	42.4	34.7	41.6
Ward 2	Sub. Number												
	2	139.7	135.3	122.6	108.9	132.8	135.8	143.1	139.1	135.3	128.2	117.6	123.6
	12	84.6	82.5	76.1	72.2	91.3	94.6	102.9	100.9	97.2	90.2	73.1	73.7
	18	95.0	96.7	89.0	93.1	110.8	120.4	127.7	120.0	119.1	110.1	86.8	87.1
	21	34.5	33.3	32.4	30.7	32.9	32.9	33.7	33.6	31.9	32.7	29.1	30.7
	52	151.9	150.9	141.4	121.9	147.9	146.6	159.7	149.4	149.6	142.3	127.3	138.9
	74	27.4	26.8	28.7	33.7	35.1	36.1	42.3	40.0	39.3	35.9	29.8	27.9
	124	92.1	93.7	85.7	73.4	85.2	88.5	93.7	93.1	88.5	84.3	78.6	82.3
	197	104.9	102.5	95.4	89.4	100.4	100.2	104.1	100.9	100.1	97.0	87.0	92.3
Ward 3	Sub. Number												
	38 - Mobile	27.6	28.8	30.0	24.8	37.3	34.9	38.7	33.5	32.4	30.3	27.1	26.7
	38	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0	2.6
	77	50.5	48.3	43.2	40.4	59.8	59.6	66.9	60.8	59.2	54.1	39.9	43.4
	129	124.1	120.3	108.6	92.2	140.4	139.6	153.5	148.2	145.0	137.2	102.0	105.3
Ward 4	Sub. Number												
	27	26.1	22.4	21.3	22.2	30.8	35.0	35.6	32.1	31.6	27.6	25.4	26.7
	190	84.1	74.3	68.1	54.3	78.5	82.2	90.5	87.2	81.6	80.7	61.1	67.4
Ward 5	Sub. Number												
	133	91.9	86.4	82.5	61.3	87.4	91.1	103.4	95.3	94.0	88.1	67.8	74.4
	212	115.2	111.9	105.4	89.9	108.3	112.2	122.1	117.6	113.6	112.6	116.5	111.0
Ward 6	Sub. Number												
	Sta. 'B'	45.7	44.0	44.1	41.0	48.4	55.0	58.2	55.7	54.9	50.6	38.9	44.1
	33	11.9	11.1	11.3	12.1	14.3	15.6	17.2	15.7	15.6	15.1	10.9	11.2
	117	80.3	81.5	87.6	87.6	97.8	101.2	105.7	104.6	96.6	88.4	75.8	78.9
	161	91.9	92.1	93.3	88.8	103.8	102.4	104.3	100.6	100.3	96.5	84.0	84.7
	223	72.2	68.5	63.0	51.5	69.9	69.5	77.5	74.4	71.4	67.6	55.2	65.3
Ward 7	Sub. Number												
	7	154.3	150.7	136.6	100.5	140.2	140.4	159.1	155.4	142.4	136.2	114.0	124.4
Ward 8	Sub. Number												
	8 (13.8 kV)	23.4	22.2	22.0	21.6	23.5	23.4	27.9	23.9	23.9	23.1	22.4	23.1
	136	83.2	76.8	75.4	67.6	80.1	88.9	93.9	90.9	86.8	85.4	68.9	78.3
	168	24.9	22.3	19.0	16.6	23.2	20.1	25.6	24.1	22.8	19.0	18.9	18.1

Notes: All substations supply 13.8kV of primary power.
Substation Peaks above are Raw Data pulled from Pepco's PI Historian and have not been analyzed for errors, anomalies, or temporary load transfers.

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 10

QUESTION NO. 13

Provide Pepco's monthly actual peak load by substation for each month of 2020 in which such data are available. Provide this information as a working electronic spreadsheet.

RESPONSE:

The responses are not yet developed and will be provided as soon as possible.

SUPPLEMENTAL RESPONSE (June 3, 2020):

See FC 1156 DCG DR 10-13 Supplement Attachment.

SPONSOR: Bryan L. Clark

2020 District of Columbia Monthly Substation Peak Loads
Loads in Mega-Volt-Amperes (MVA)

Ward 1	Sub. Number	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
	10	89.4	81.2	75.0	67.6	87.9							
	13	27.4	24.8	22.5	20.6	25.0							
	25	38.0	37.5	32.2	26.1	44.5							
Ward 2	Sub. Number												
	2	126.4	114.2	110.1	70.4	93.0							
	12	79.5	71.5	68.1	53.0	68.6							
	18	92.9	87.7	87.7	65.1	87.0							
	21	33.8	30.1	27.6	18.4	20.2							
	52	142.4	129.5	123.1	83.2	104.5							
	74	27.0	27.0	27.4	22.6	24.1							
	124	87.1	76.6	72.9	53.2	63.3							
	197	95.7	87.6	81.5	68.2	71.6							
Ward 3	Sub. Number												
	38 - Mobile	24.8	23.9	22.5	6.4	1.2							
	38	2.6	2.6	14.1	15.4	23.2							
	77	44.3	41.5	35.9	32.0	50.9							
	129	110.5	101.8	91.6	79.2	106.8							
Ward 4	Sub. Number												
	27	25.2	24.9	23.9	21.8	19.0							
	190	68.7	62.3	58.0	47.0	58.9							
Ward 5	Sub. Number												
	133	75.0	70.9	61.7	50.8	66.6							
	212	115.7	105.1	97.9	72.2	88.5							
Ward 6	Sub. Number												
	Sta. 'B'	43.5	39.3	38.6	15.8	16.5							
	33	10.9	11.4	11.2	3.1	0.0							
	117	80.4	78.3	73.4	58.4	72.6							
	161	87.3	84.0	82.1	63.7	73.4							
	223	65.6	60.8	64.7	65.4	89.8							
Ward 7	Sub. Number												
	7	124.4	123.5	108.3	85.8	108.0							
Ward 8	Sub. Number												
	8 (13.8 kV)	22.8	22.2	22.5	22.1	22.5							
	136	78.3	67.0	61.1	52.3	72.0							
	168	20.5	20.0	16.6	19.4	15.0							

Notes: All substations supply 13.8kV of primary power.
Substation Peaks above are Raw Data pulled from Pepco's PI Historian and have not been analyzed for errors, anomalies, or temporary load transfers.

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 6

QUESTION NO. 1

Referring to the Second Supplemental Direct Testimony of Kevin McGowan (PEPCO 3B), page 11, lines 10-12 regarding the Company's ability to invest more quickly in grid modernization and technology under a Multiyear Rate Plan (MRP) as opposed to a historic recovery approach:

- A. Are there specific grid modernization investments or new technologies in Pepco's MRP that Pepco proposes to undertake if the MRP is approved, but would be delayed if the MRP were not approved?
- B. Identify the specific grid modernization investments and new technologies in Pepco's MRP that Pepco proposes to undertake if the MRP is approved but would be delayed if the MRP were not approved.
- C. Provide all documents, memos, reports, presentations, and plans that Pepco has developed that focus on grid modernization plans or investments in new technology in the District of Columbia. In your response, include internal documents and presentations to the PHI Board of Directors, as well as public documents.
- D. For each of the documents produced in response to (C), identify whether any assumptions were made when developing the document regarding whether Pepco was operating under an MRP or under traditional cost of service ratemaking.

RESPONSE:

The question to 6-1(c) has been modified, as set forth below, based on discussions between counsel for Pepco and DCG:

"Has Pepco prepared any documents, memos, reports, presentations, or plans focused on grid modernization in the District of Columbia that show how Pepco's proposed MRP investments fit into a long-term grid modernization plan? If yes, please provide these documents, including internal documents and presentations to the PHI Board of Directors, as well as public documents."

- A. See response to FC 1156 DCG DR 5-11 for a description of the grid modernization activities included in the MRP. As noted by Company Witness Velazquez, some of the investments needed to allow widespread adoption of the technologies, such as smart energy infrastructure, many distributed energy resources, transportation and electrification, are not in the current capital plan through 2022. The recent regulatory guidance provided by orders in the Capital Grid proceeding, the Transportation Electrification proceeding, the Energy Efficiency and Demand Response proceedings, and PowerPath DC will help the Company align its investments more closely with the District's goals. Moreover, by putting in place

the MRP, Pepco may more closely align its planned investments with the goals of the District of Columbia, the Commission and customer expectations.

The Company has not identified which specific investments may be delayed if the MRP is not approved since the identification depends on the final plan that is approved by the Commission. However, timely recovery of costs will enable the Company to invest at the level and pace required to fully support the District of Columbia, Commission and customer expectations. Under a historic recovery approach, the Company would be constrained in its ability to invest as quickly in grid modernization and technology, and any investments that go beyond the obligation to provide safe and reliable service could be deferred or eliminated.

B. Refer to Part A.

C. Refer to DCG 5-11 for grid modernization activities included in the MRP. The Company has not prepared a separate plan for new technology investments in the District of Columbia. The recent regulatory guidance provided by orders in the Capital Grid proceeding, the Transportation Electrification proceeding, the Energy Efficiency and Demand Response proceeding, and PowerPath DC will help to inform the types of new technology investments the Company will make in the District of Columbia in the future.

D. Refer to Part C.

SPONSOR: Kevin McGowan/Bryan Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 10

QUESTION NO. 11

Refer to PEPCO (I)-2, 73902: Transformer Load Management (TLM) Pep - DC (UDLPLM7W21).

- A. How many transformers does Pepco plan to replace in each year?
- B. Provide the number of transformers that Pepco replaced in each of the past five years, and the associated annual costs of such replacements. Provide this information as a working electronic spreadsheet.

RESPONSE:

- A. The Company plans to replace approximately 45 transformers each year; however, actual replacements depend on various factors, including further analyses in the field and available budget
- B. The requested study has not been performed.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 8

QUESTION NO. 4

Referring to the statement of Pepco Witness Clark in his rebuttal testimony (Exh. PEPCO (2I)), pages 34 and 36, that “a more reliable system requires fewer truck rolls for corrective maintenance and reduces the need for backup generation, which reduces greenhouse gas emissions and supports the goals of the District of Columbia and the Commission”:

- A. Has Pepco quantified the reduction in truck rolls? If yes, please provide the reduction.
- B. Has Pepco quantified the reduction in backup generation? If yes, please provide the reduction.
- C. Has Pepco quantified the reduction in greenhouse gas emissions from fewer truck rolls and backup generation? If yes, please provide the reduction.
- D. Has Pepco quantified the reduction in greenhouse gas emissions from investments outlined in its MRP proposal? If yes, please provide. If no, please describe why the Company did not calculate greenhouse gas emissions reductions.

RESPONSE:

Pepco is still compiling this response and will provide it as soon as practicable.

SUPPLEMENTAL RESPONSE:

A – D. Pepco has not performed the requested study.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 4

QUESTION NO. 22

In reference to Exhibit PEPKO (I), page i, entitled “PEPKO DISTRICT OF COLUMBIA CAPITAL CONSTRUCTION SUMMARY”:

- A. Provide an electronic Excel spreadsheet file with the total Distribution Construction spending amounts for grid modernization investments by year.
- B. Going forward, would the Company consider expanding its three categories of capital construction spending (customer driven, reliability, and load) to include a fourth category for grid modernization?

RESPONSE:

- A. Pepco does not categorize and identify projects as grid modernization projects. Pepco categorizes projects according to need.
- B. Pepco does not categorize and identify projects as grid modernization projects. Pepco categorizes projects according to need. The current categorization of projects has existed for years and is well known to the Commission and stakeholders, and such categorization has been accepted by the Commission in previous rate cases. The projects that fall under these categories modernize the system by providing a reliable system with sufficient capacity to support new technologies or by adding new technologies to the system.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 4

QUESTION NO. 25

Identify and provide all documents and analyses that support the proposition that the Company's construction plan will enable the future deployment of solar and storage Distributed Energy Resources.

RESPONSE:

The Company's construction plan includes projects designed to improve system capacity and reliability. Projects which improve the capacity and reliability of the distribution system enable the effective deployment of distributed energy resources to the extent that these resources depend on the distribution system for import and export of energy in their operating models. Effective control of system voltage is paramount in the integration of distributed energy resources, therefore, projects supportive of voltage control enable future deployments of distributed energy resources.

See FC 1156 DCG DR 4-25 Attachment for the distribution system planning non-wires alternatives proposal.

For more information on Pepco's DER process, see FC 1156 DCG DR 4-27 Attachment.

SPONSOR: Bryan L. Clark

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 1

QUESTION NO. 27

Refer to Exhibit PEPCO (J) page 8 lines 1-2, indicating that 14 states currently use MRP frameworks in electric utility regulation, and page 7 lines 21-22, stating that, "...it is not unusual for a regulatory plan to include an MRP using two or more forecasted test years and performance incentive mechanisms (PIMs)."

- a. Identify each state or electric utility that currently has an MRP framework using two or more forecasted test years.
- b. Identify each state or electric utility that currently has an MRP using revenue requirements determined exclusively from forecasted future test years, consistent with the approach proposed by Pepco.

RESPONSE:

- A. Yes, and, in addition, these mechanisms are frequently used in combination with one another. For example, it is not unusual for a regulatory plan to include an MRP using two or more forecasted test years and performance incentive mechanisms (PIMs). A recent report indicates that MRPs for utilities are in place in 17 states (14 of which apply to electric utilities) and forecasted test years are used in 24 states. In addition, PIMs, another component in Pepco's proposed plan, are in place in 16 states. The reference for the statements is a 2015 report by the Edison Electric Institute.

As explained on page 9 lines 2-7, I explain that one way to set the revenue requirement in a multi-year rate plan is a "stair-step" approach, which is typically based on multiple forecasted years. According to the 2015 Edison Electric Institute report at the time of writing, 12 utilities used a "stair-step" approach to setting the revenue requirement in a multi-year rate plan. These utilities are found in Table 7 of the report, which reproduced in part in the table below.

State	Company	Plan Term	Rate Escalation Provisions
CA	Bear Valley Electric Service	2013-2016	Revenue Cap Stairstep
CA	Pacific Gas & Electric	2014-2016	Revenue Cap Stairstep
CA	San Diego Gas & Electric	2012-2015	Revenue Cap Stairstep
FL	Gulf Power	2014-June 2017	Price Cap Stairstep through 2015, Rate Freeze beyond
FL	Tampa Electric	2013-2017	Revenue Cap Stairstep
GA	Georgia Power	2014-2016	Revenue Cap Stairstep
IA	MidAmerican Energy	2014-2017	Revenue Cap Stairstep for 2014-2016, Rate Freeze for 2017
NH	Public Service Company of New Hampshire	2010-2015	Revenue Cap Stairstep: Rate increases allowed to account for distribution capital additions in 2010-2013
NH	Unitil Energy Systems	2011-2016	Revenue Cap Stairstep: Rate increases allowed to account for distribution capital additions in 2011-2013
NY	Central Hudson Gas & Electric	2015-2018	Revenue Cap Stairstep
ND	Northern States Power - Minnesota	2013-2016	Revenue Cap Stairstep for 2013-2015, Rate Freeze in 2016
WA	Puget Sound Energy	2013-2016	Revenue Cap Stairstep

Source: Table 7 of "Alternative Regulation for Emerging Utility Challenges: 2015 Update," Edison Electric Institute, November 11, 2015.

- B. The utilities shown in the table included in the response to DCG 1-27(a) use forecasted test years in the associated MRPs. I am not aware if the revenue requirements for these utilities were determined in a manner completely consistent with the approach proposed by Pepco.

SPONSOR: William P. Zarakas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG FOLLOW-UP DATA REQUEST NO. 9

QUESTION NO. 4

Refer to the Rebuttal Testimony of Mr. Wolverton, page 16, lines 6-7, which states “Moreover, prudency reviews can be done both during this MRP proceeding as well as in connection with the ARF, so parties’ ability to assess prudency is protected.”

- A. Is the Company requesting that the Commission pre-approve its capital investments as contained in its capital investment plan prior to the Company placing such investments in service? Explain.
- B. Is the Company requesting that the Commission provide a prudency determination regarding the prudency of the investments contained in its capital investment plan prior to the Company placing such investments in service? Explain.
- C. Is the Company aware of any other MRPs in which the Commission pre-approves the utility’s forecasted costs prior to the Company placing the forecasted investments in service? If yes, identify the utility and commission order in which the investments were pre-approved.
- D. Is the Company aware of any other MRPs in which the Commission issues a prudency determination regarding the utility’s forecasted costs prior to the Company placing such investments in service? If yes, identify the utility and commission order in which such prudency determinations were made.
- E. Under the Company’s proposal, would the Annual Reconciliation Filing (ARF) include an annual prudency determination regarding all of the investments that came into service that year? Explain.

RESPONSE:

The correct reference for this line is page 20, lines 6-7.

- A. The Company is requesting the Commission approve a three-year revenue increase that includes the return on its planned capital additions. As stated in Company Witness Wolverton’s Rebuttal Testimony at page 20, “...prudency reviews can be done both during this MRP proceeding as well as in connection with the Annual Reconciliation Filing.” Please also refer to Company Witness Wolverton’s Rebuttal Testimony at page 6, Question 8.
- B. Please refer to part A.
- C. It is Company Witness Zarakas’s general understanding that when a Commission approves a stair-step MRP, the Commission is approving the annual level of revenues to be collected. These annual revenues reflect the Commission-approved level of expenditure related to capital and operating and maintenance expenditures costs.
- D. Please refer to part C.
- E. Please refer to part A.

FOLLOW-UP REQUEST:

The Company's response to DR 9-4(D) does not state whether Mr. Zarakas is aware of any Commissions that have issued a *prudency determination on the Company's investments* when that Commission approves the annual level of revenues. Answer the question.

FOLLOW-UP RESPONSE:

No. Company Witness Zarakas has not specifically looked at this issue. However, as stated in the original response to this question, it is Company Witness Zarakas' understanding that when a Commission approves a stair-step MRP, the Commission is approving the annual level of revenues to be collected. These annual revenues reflect the Commission-approved level of expenditure related to capital and operating and maintenance costs. Company Witness Zarakas is not aware whether these approved capital and operating and maintenance costs were specifically determined to be prudent as part of a prudency review.

SPONSOR: Tyler Wolverton / William P. Zarakas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG FOLLOW-UP DATA REQUEST NO. 9

QUESTION NO. 5

Refer to the Rebuttal Testimony of Mr. Wolverton, page 16, lines 16-21.

- A. Identify, by company and jurisdiction, each instance of an MRP in which the Commission-approved revenue requirement was based directly on the utility's projected costs, including a capital plan with specific project budgets. Provide the associated docket number in which the revenue requirement was approved.
- B. For each instance identified in (A), indicate at what point in the MRP the prudence of such projected costs was determined. In other words, was prudence determined in the initial MRP case, during the MRP period as projects were implemented, or at the conclusion of the MRP period? Explain.
- C. For each instance identified in (a), indicate whether the prudence determination process included testimony by the parties (e.g., the utility and stakeholders), or whether the determination was made based solely on utility filings and stakeholder comments.

RESPONSE:

- A. Regulatory commissions generally review and approve revenue requirements, which include projected operating costs and capital spending, under stair-step MRPs. These may or may not include review of project budgets at a detailed level. A list of utilities using the stair-step approach was provided in response to FC 1156 DCG DR 1-27, Part A.
- B. The requested study has not been performed.
- C. Please refer to Part B.

FOLLOW-UP REQUEST:

The response to DR 9-5(A) does not identify which of the MRPs using a stair-step approach include a revenue requirement that was based directly on the utility's projected costs, including a capital plan with specific project budgets. Answer the question, and if the witness does not know, or is uncertain, so state.

FOLLOW-UP RESPONSE:

Company Witness Zarakas has not specifically looked at this issue.

SPONSOR: William P. Zarakas

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 2

List all companies under Exelon Corporation's (Exelon) consolidated corporate structure, as presently constituted, that Pepco understands to carry joint and several liability for remediation and / or restoration costs at the Benning Road site under CERCLA, RCRA, or the Brownfield Act.

RESPONSE:

As stated in response to FC 1156 DCG DR 3-1, Company Witness Sanford cannot respond to this question because it requires a legal conclusion. However, 5% of the costs incurred to date related to the remediation and restoration have been allocated to PES.

FOLLOW-UP REQUEST:

With regard to remediation and restoration costs incurred and allocated to PES:

- A. Explain in detail, the basis for allocating 5% of such costs to PES. How was this percentage figure determined?
- B. Do the remediation costs included in RMA 22a and 22b for Benning Road discussed in Witnesses Sanford's and Ziminsky's testimonies exclude the 5% that was allocated to PES?
- C. What is the total dollar amount of 5% of the costs incurred to date?
- D. Will PES continue to incur 5% of the remediation and restoration costs
- E. Identify and provide all documents that support the decision to allocate 5% of the remediation and restoration costs to PES.

FOLLOW-UP RESPONSE:

- A. Please see FC 1156 DCG Follow-up DR 3-2 Attachment.
- B. Yes, RMAs 22(a) and 22(b), which are part of Company Witness Ziminsky's Direct Testimony, exclude allocations to PES.
- C. \$0.6M (\$10.7 Million / 0.95 * 0.05)
- D. Yes, PES will continue to incur the 5% in conjunction with the investigation.
- E. See subpart A.

SPONSOR: Tammy D. Sanford, Jay Ziminsky, Tyler Wolverton

Pepco/PES 95/5 Allocation

	<u>T/D</u>	<u>Gen</u>	<u>Total</u>
Site Acreage	62	15	77
1929 - 2001 Pepco Ownership %	100%	100%	100%
1929 - 2001 PES Ownership %	0%	0%	0%
2001 - 2011 Pepco Ownership%	100%	0%	81%
2001 - 2011 PES Ownership%	0%	100%	19%

Documented Incidents Years*

1985-2001	16	62%
2001-2011	10	38%
Total	26	

Allocation to Pepco	93%
Allocation to PES	7%
	100%

PCB Equipment Years**

1929-1979	50	61%
1979-2001	22	27%
2001-2011	10	12%
	82	

Allocation to Pepco	98%
Allocation to PES	2%
	100%

<u>Average of Two Approaches</u>	
Allocation to Pepco	95%
Allocation to PES	5%
	100%

*First Documented Incident in 1985 per Schedule (TDS)-2, Table 1, page 21 through 23 of 80

**PCBs were manufactured for 50 years from 1929 to 1979.

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 35

At Exhibit PEPCO (K), page 18 line 8-10, explain in detail what Witness Sanford means by the investigative information reviewed in this testimony having a “new effect on coverage analysis.”

RESPONSE:

Each insurance policy has varying coverage and exclusions limits and therefore, new investigative information may change the claim strategy for finalizing the insurance claim in order to seek the appropriate level of reimbursement from the insurers.

FOLLOW-UP REQUEST:

With regards to Pepco’s response:

- A. Clarify whether Pepco is actively seeking recovery of insurance proceeds under all approximately 177 policies identified in Response to OPC DR 31-39(E)?
- B. Clarify whether Pepco has met with any of its other insurers at any time other than that during the period covered by the June 28, 2019 bi-annual report required by Formal Case No. 1150?
- C. Clarify whether Pepco is seeking to meet with any insurers in addition to AEGIS? If so, which insurers, and when will the meeting occur?
- D. Without revealing overall strategy or individual recoveries sought, what is the total reimbursement Pepco is seeking from insurers on the 177 policies?

FOLLOW-UP RESPONSE:

- A. Yes, Pepco is actively seeking recovery from any appropriate insurer, i.e. those insurers that are solvent and issued insurance policies that do not have exclusions for pollution liability and were in place during the time of exposure.
- B. No, Pepco has not.
- C. Pepco intends to meet with appropriate insurers; however, such meetings have not been scheduled at this time.
- D. Pepco is seeking recovery for any insurable costs however, all remediation projects related to the associate insurance claims have not been completed and invoiced, therefore it is not possible to estimate the total reimbursement that Pepco is seeking from insurers.

SPONSOR: Tammy D. Sanford, Jay C. Ziminsky, Tyler Wolverton

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO OPC DATA REQUEST NO. 31

QUESTION NO. 39

Insurance Coverage for Remediation. With reference to Ms. Sanford's testimony, Pepco (K) at 17:14–18:13, with regards to the insurance carriers mentioned therein, please provide:

- A. The full and correct name of each such insurance carrier;
- B. The insurance policy number for each policy;
- C. The maximum limit of insurance provided by each such policy;
- D. The name and address of the person in custody of each policy; and
- E. Whether legal costs are deducted from coverage provided; and
- F. A copy of each notice of claim provided to insurance carriers.

RESPONSE:

A-C. See FC 1156 OPC DR 31-39 Confidential Attachment A, which provides: the name of each insurance carrier, policy number, and insurance limit.

D. Lauren Lubick, Marsh Risk Consulting, 445 South Street, Morristown, NJ 07960.

E. Whether one or both legal defense costs and investigative/remediation expense costs erode the self-insured retention limit and whether one or both also erode the indemnification limits in the insurance grant provisions requires a legal analysis on a policy-by-policy basis and we have not performed this analysis across the 177 potentially applicable insurance policies.

F. See FC 1156 OPC DR 31-39 Confidential Attachments B through J.

SPONSOR: Tammy Sanford

DCG-87
CONFIDENTIAL
ATTACHMENT

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 6

Regarding Witness Sanford's testimony at PEPCO Exhibit (K) at page 3, lines 17-21, provide any historical documentation of past handling, storage, treatment, transportation, or disposal practices of any solid or hazardous waste by previous owners of the land now comprising the Benning Road site prior to Pepco's initial 1906 land acquisition, and prior to each of the seven additional parcels Pepco acquired between 1906 and 1956.

RESPONSE:

Company Witness Sanford is unaware of the existence of such documentation and no such study has been performed.

SPONSOR: Tammy D. Sanford

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 13

Regarding the power generation facility at the Benning Road site, for each year from deregulation in 2000 through deactivation in 2012:

- A. How many MWs of electricity were generated on an annual basis?
- B. Provide the annual revenue amounts from electricity sales associated with these generation activities.
- C. Provide all calculations and workpapers in Excel format with formulas intact to support the above annual numbers.

RESPONSE:

A-C. Company Witness Sanford has not performed this study or analysis.

SPONSOR: Tammy D. Sanford

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 14

For each year during the period 2000 through deactivation in 2012, in which electricity was generated at the Benning Road site, what percentage of electricity was sold to customers outside of the District of Columbia?

RESPONSE:

See response to FC 1156 DCG DR 3-13.

SPONSOR: Tammy D. Sanford

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 17

In reference to Witness Sanford's testimony at PEPCO Exhibit (K), page 6, lines 16-17, she states "PPR retired the Benning power plant in June 2012, and most of the structures were demolished and removed by May 2015." State:

- A. Whether the cooling towers, including the concrete basins, would have been demolished and removed in the absence of any PCB contamination associated with these structures?
- B. What portion of the \$3.43 million consists of costs to demolish and remove the concrete basins, and what portion consists of removal of the PCB-contaminated soil?

RESPONSE:

- A. To Ms. Sanford's knowledge, the above-ground structure (including the wooden cooling towers) were demolished as part of the demolition of the site. The concrete basins and surrounding soil, however, were remediated and removed because of the PCB contamination in the vicinity of those structures.
- B. The demolition of the cooling tower basins was approximately \$1.25M and the removal of soil was approximately \$1.0M. The remaining costs were associated with permitting, installation of stormwater management infrastructure, and ambient air monitoring during demolition.

SPONSOR: Tammy D. Sanford, Jay C Ziminsky

POTOMAC ELECTRIC POWER COMPANY
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QUESTION NO. 23

In reference to each of the “Previous Investigations” listed in PEPCO Exhibit (K)-2, pages 21-23:

- A. State whether the costs for each of the “remediation activities” listed were recovered from District of Columbia ratepayers.
- B. If your answer to A is yes, state whether those costs were recovered in the generation, transmission or distribution portion of rates.
- C. If your answer to B is no, identify the entity responsible for the costs associated with each of the “remediation activities.”

RESPONSE:

A-B. See chart below.

PEPCO Exhibit (K)-2, pages 21-23	Costs Fully Paid by Company	Pepco DC Customers Currently Paying any of these costs?	Cost	FERC Accounting
1985 PCB Cleanups	Y	N	Not available due to time lapsed since event.	
1988 Parking Lot and PCB Cleanups	Y	N	Not available due to time lapsed since event.	
1991 PCB Cleanups	Y	N	Not available due to time lapsed since event.	
1995 Cooling Towers PCB Cleanup	Y	N	Not available due to time lapsed since event.	
Cooling Tower Unit 15	Y	N	\$3.43MM Total Pepco cost for remediation (DC Portion = \$1.98MM)	Initial non-cash expense accruals to record environmental liability were recorded to FERC account 588, which were removed from cost of service through RMAs. Actual costs incurred requested through regulatory asset with 10-year amortization in instant proceeding.
Cooling Tower Unit 16	Y	N		
2016 Cooling Tower Basin and Soil Removal	Y	N		

C. Company Witness Ziminsky cannot respond to this question because it requires a legal conclusion.

SPONSOR: Jay C. Ziminsky

POTOMAC ELECTRIC POWER COMPANY
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QUESTION NO. 24

In reference to Exhibit PEPCO (K), page 6, lines 9-14, for each of the Historical Onsite Cleanups and Investigations listed in Section 5 of the “Technical Memorandum #1 Conceptual Site Model” state whether each of these incidents would have been the result of generation-related activities, transmission or distribution-related activities.

RESPONSE:

Section 5.1 – Petroleum Hydrocarbon releases – Generation

Section 5.1.1 – Fueling Island – Transmission, Distribution, and Generation

Section 5.2.1 – 1985 PCB Cleanup – Distribution

Section 5.2.2 – 1988 Parking Lot PCB Cleanup – Transmission

Section 5.2.3 – 1991 PCB Cleanup – Transmission and Distribution

Section 5.2.4.1 and 5.2.4.2 – Cooling Tower Units 15 and 16 – Generation

Section 5.2.5 – 2016 Cooling Tower Basin and Soil Removal – Generation

SPONSOR: Tammy D. Sanford

POTOMAC ELECTRIC POWER COMPANY
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QUESTION NO. 26

At Exhibit PEPCO (K)-2, page 17, it states “The power plant is owned by Pepco Energy Services and operated by North American Energy Services.”

- A. Identify North American Energy Services and explain the nature of this entity’s relationship with Pepco or a Pepco-affiliate.
- B. Is North American Energy Services still in existence?
- C. To what extent does Pepco believe that North American Energy Services is a PRP at the Benning Road site?
- D. To what extent does Pepco believe that North American Energy Services is a PRP at the ARSP site?
- E. Did Pepco require North American Energy Services to maintain insurance of any kind?
If so:
 - 1. What kind of insurance?
 - 2. Produce a copy of the policy.
 - 3. Describe all efforts undertaken by Pepco to obtain insurance proceeds from this policy.

RESPONSE:

- A. North American Energy Services is a company that operates generation plants on behalf of generation plant owners.
- B. Yes.
- C-D. The requested analyses have not been performed.
- E. Pepco is not in possession of any copies of such insurance policies for any vendors or sub-contractors of PES.

SPONSOR: Tammy D. Sanford, Jay C. Ziminsky

POTOMAC ELECTRIC POWER COMPANY
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QUESTION NO. 28

At Exhibit PEPCO (K), page 17 lines 20-23, explain in detail why Pepco limited its insurance policy inquiry to the past 5 decades when historical operations at the Benning Road site date back to 1906. In your explanation, identify where in the Formal Case No. 1150 Settlement Agreement, the settling parties agreed that Pepco would limit its insurance inquiry to only the past 50 years.

RESPONSE:

Pepco Corporate Insurance identified all known insurance policies based on all available records. Based on the results of this search, it was determined that the first environmental liability policy procured by Pepco was obtained in 1958.

SPONSOR: Tammy D. Sanford, Jay C. Ziminsky

POTOMAC ELECTRIC POWER COMPANY
DISTRICT OF COLUMBIA FORMAL CASE NO. 1156
RESPONSE TO DCG DATA REQUEST NO. 3

QUESTION NO. 37

In reference to the June 28, 2019 bi-annual status report, it states Pepco “has provided additional updates to the appropriate insurers that have provided insurance to Pepco for the relevant timeframe, has held meetings with some insurers and is currently in the process of scheduling meetings with other insurers to discuss the current status of the claim and anticipated future costs.”

Identify:

- A. Each “appropriate insurer” with whom Pepco provided additional updates;
- B. The nature of each update provided;
- C. The “relevant timeframe”;
- D. Each insurer with whom Pepco has met, or with whom Pepco has scheduled a meeting;
- E. The date on which each meeting occurred, or will occur;
- F. The current status of each claim; and
- G. The anticipated future costs of each claim.

RESPONSE:

A,B,C,E,F,and G. Refer to the Company’s response to FC 1156 OPC 31-39.

D. During the period covered by the June 28, 2019 bi-annual status report, Pepco met with AEGIS Insurance Services on 4/16/2019.

SPONSOR: Tammy D, Sanford, Jay C. Ziminsky

CERTIFICATE OF SERVICE

I certify that on October 24th, 2020, a copy of DCG's Cross Examination Exhibit List for October 27th Evidentiary Hearings was served via electronic mail on the following parties:

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