



Peter E. Meier
Vice President, Legal Services

EP1132
701 Ninth Street, NW
Suite 1100, 10th Floor
Washington, DC 20068

202 872-2953
202-872-3281 (fax)
Peter.meier@pepcoholdings.com

June 22, 2015

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

Re: Formal Case No. 945

Dear Ms. Westbrook-Sedgwick:

Pursuant to Order No. 17862 ("Order"), issued April 24, 2015 by the Public Service Commission of the District of Columbia ("Commission"), and the Notice of Final Rulemaking published in the *D.C. Register* on May 8, 2015,¹ Potomac Electric Power Company ("Pepco") hereby submits its proposed "Procedural Manual for Implementation and Administration of Community Renewable Energy Facilities" ("Procedural Manual").

The Order, specifically Rule 908.4, directs Pepco to submit a procedural manual that shall include, but not be limited to:

- (1) The arrangement between the Electric Company, the SOS Administrator and the CREF related to the SOS Administrator taking title to CREF output at the point of common connection between the CREF and the Electric Company's distribution grid;
- (2) The arrangement between the Electric Company, the SOS Administrator and the CREF relating to the SOS Administrator's purchase of, and payment for, unsubscribed energy from the CREF at the price specified in these rules;
- (3) The arrangement between the Electric Company, the SOS Administrator and the CREF for the Electric Company to create the CNM Credit based on CREF output and the price specified in the rules;
- (4) Arrangement between the Electric Company, and the CREF to credit individual CREF Subscribers with the CNM Credit based on each Subscriber's ownership share in the CREF and the CREF's monthly output and to modify the list of Subscribers and the amount of each Subscribers' Subscription; and

¹ *D.C. Register*, Vol. 62 No. 19 (May 8, 2015).

Ms. Brinda Westbrook-Sedgwick

Page 2

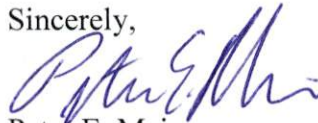
June 22, 2015

- (5) Arrangement between the Electric Company and Competitive Electricity Suppliers to reflect the payments of the energy supply charges for CES customers who are also CREF Subscribers.

The enclosed Procedural Manual presents Pepco's proposed plan for implementing and administering the program related to Community Renewable Energy Facilities ("CREFs") in the District of Columbia. The Procedural Manual is intended to be read and understood in tandem with Pepco's June 8, 2015 submissions that include: (1) CREF Contract; (2) CREF Contract Application Form; (3) Community Renewable Energy Facility Schedule; (4) CNM Rider; and (5) Addendum to Pepco's Standard Interconnection Agreement. Please note, however, that neither the June 8, 2015 filings nor the Procedural Manual address the arrangement between Pepco and Competitive Electricity Suppliers ("Suppliers") because payments to Subscribers will not affect Suppliers under the proposed compensation arrangement.

In addition, Pepco submits a proposed "Community Renewable Energy Facility (CREF) Change of Subscriber Information Form," a form that will be an attachment to the CREF Contract submitted by Pepco on June 8, 2015.

Sincerely,



Peter E. Meier

PEM/mda

Enclosures

cc: All Parties of Record

**PROCEDURAL MANUAL FOR IMPLEMENTATION AND ADMINISTRATION OF
COMMUNITY RENEWABLE ENERGY FACILITIES**

1) Generator Facility Interconnection

- a) The Generator Owner shall follow Pepco's Standard Interconnection Application¹ process as defined in Title 15, Chapter 40 of the D.C. Municipal Regulations for Small Generator Interconnection Rule (SGIR).
- b) To participate in Community Net Metering as a Community Renewable Energy Facility (CREF), the Generator Owner will be required to execute a standard Interconnection Agreement with a CREF Addendum.

2) CREF Contract Application Form Processing

- a) The Subscriber Organization will submit a CREF Contract Application Form to the Company. The CREF Contract Application Form should be submitted concurrently with the Generator Facility's Interconnection Application to ensure that Subscriber processing is completed before the CREF is given authorization to operate.
- b) Prior to acknowledging the receipt of the application as complete, the Company will verify the following:
 - i) Customer information provided in the Subscriber Information Section of the Application Form is accurate;
 - ii) The total of all Subscription Percentages for the CREF does not exceed 100 percent;
 - iii) Each Subscriber has not subscribed to more than 120% of the customer's historical annual consumption including any Subscriptions to other CREFs;
 - iv) All other required information has been provided.
- c) All Subscribers will be notified that the Company has been informed by a CREF that the Customer wishes to participate under the Company's Community Net Metering (CNM) Rider and what the CREF indicated that their Subscription Percentage would be. The Customer will be asked to respond to the Company and the CREF if the information in the correspondence is not correct.

3) CREF/CNM Metering

- a) The CREF's Production Meter will have be an interval NEM-capable AMI (preferred) or MV90-read (if an AMI NEM-capable meter is not available).
- b) Within Pepco's Customer Relationship Management and Billing (CRM&B) system, the Production Meter will be assigned to a rate class chosen by the SOS Administrator.
- c) The SOS Administrator will choose a rate class for the CREF's account that will provide the most benefit to SOS Customers taking into account customer load that is available to be offset.
- d) Interval meter readings from the Production Meter will be retrieved on a daily basis.
- e) All Subscribers may have their rendition cycle moved to the same rendition cycle as the CREF Generator Facility.

4) Authorization to Operate (ATO)

- a) The Company will provide the Generator Owner a letter authorizing the CREF to operate after:

- (i) The Company has reviewed and accepted the final documents provided by the Generator Facility in Part II of the Interconnection Application Process, including the Inspection Certificate and an executed Interconnection Agreement with CREF Addendum; and
 - (ii) The CREF has executed a CREF Contract with the Company and meets all of the requirements for operation of a CREF.
 - b) Subscribers that have had their rendition cycle moved to the CREF's rendition cycle at the time of the CREF receiving the ATO will be assigned an Anniversary Date (the billing month in which the CREF is provided the ATO).
 - c) Once processing is complete, the Subscribers will be identified as participating under the CNM Rider within Pepco's CRM&B system.
- 5) Processing of Subscriber Information Changes
- a) Prior to accepting the Change in Subscriber Information Form as complete, the Company will verify the following:
 - i) Customer Information provided in the Subscriber Information Section is accurate;
 - ii) The total of all Subscription Percentages for the CREF does not exceed 100 percent;
 - iii) Each new Subscriber has not subscribed to more than 120% of the Customer's historical annual consumption including any Subscriptions to other CREFs; and
 - iv) All other required information has been provided.
 - b) A sample Change in Subscriber Information Form is included at Attachment A of this Procedural Manual.
 - c) New Subscribers may have their rendition cycle moved to the same rendition cycle as the CREF Generator Facility.
 - d) The new Subscribers will be identified as participating under the in CNM Rider within Pepco's CRM&B system.
- 6) Load Settlement
- a) Energy
 - i) Generation from each CREF will be handled as "negative load" and will flow through to the aggregated SOS supplier(s) load for the rate class to which the Production Meter's account is assigned.
 - b) Capacity/Transmission
 - i) Peak Load Contributions (PLCs) will be calculated for each CREF based on the previous year's generation (negative consumption) using the existing PLC determination process.
 - ii) CREFs that do not generate during the entire period for which the PLC is based will be assigned a PLC accordingly
 - iii) The CREFs PLC will be assigned to the aggregated SOS supplier(s) PLC for the rate class to which the Production Meter's account is assigned.
- 7) Monthly CNM Credit Calculations
- a) Monthly CNM Credit calculations will initially be performed manually and outside of the CRM&B system.
 - b) Tracking of Anniversary Date

- i) If the billing month is the Subscriber's Anniversary Date, the Subscriber's cumulative year-to-date kWh credit allocation will be reset to zero and a new historical annual consumption will be calculated.
- c) Tracking of Annual kWh Subscription Allocation Limit
 - i) The Company will compare each Subscriber's cumulative annual kWh credit allocation versus the 120% of the Subscriber's historical annual consumption and will limit CNM Credit payments as appropriate.
- 8) Subscriber Customer Bill Processing
 - a) Bills for Customers identified as participating under the CNM Rider within the CRM&B system will have their bills out-sorted for further processing after the bills been calculated prior to the CNM Credits being applied
 - b) One or more batch processes will be executed to include the CNM Credits into Subscribers' bills, update the Subscribers' historical billing information within CRM&B, and release the modified bills, with the modified bills sent to the Subscribers.
- 9) Unsubscribed Energy Payment
 - a) The Subscriber Organization will be registered with the Company as a vendor so that payments can be made. Through this registration process, the Subscriber Organization banking and tax information are provided to the Company.
 - b) Unsubscribed energy for each CREF will equal its metered energy production less the total kWh allocated to its Subscribers for the billing month.
 - c) The value all of the energy from the CREF for the month delivered to the SOS Administrator will be calculated using hourly PJM Pepco DC fixed nodal weighted aggregate locational marginal price and daily real-time Operating Reserve rates as if all of the energy was unsubscribed.
 - d) The payment for Unsubscribed Energy will equal the value calculated in the step above times the ratio of Unsubscribed Energy to the total metered energy produced by the CREF for the billing month.
- 10) Calculation of Rates for Standard Offer Service (SOS)
 - a) The Company is recommending that the SOS rates calculation process not be modified until such time as CREF output would have a material impact on rates.
- 11) Calculation of the Procurement Cost Adjustment (PCA) for SOS Customers
 - a) The PCA calculation will be updated to reflect two new sources of procured power, Unsubscribed Energy and Subscribed Energy.

ⁱ The standard Small Generator Interconnection Applications need to be modified to include sales to the Company under its CREF tariff and sales to the Company under its CG-SPP Tariff as two new options for as the intent of the generation.



A PHI Company

DISTRICT OF COLUMBIA

**COMMUNITY RENEWABLE ENERGY FACILITY (CREF) CONTRACT
CHANGE OF SUBSCRIBER INFORMATION FORM**

The Green Power Connection™ Team
Pepco
A PHI Company
(202) 872-3419 - Phone
gpc-south@pepco.com

(Send applications via Email or Mail to Pepco, GPC Team)

Mailing Address: Mail Stop 7642, 701 9th St. NW, Washington, DC 20001

SECTION I: SUBSCRIBER ADDITIONS¹

Attach additional sheets as necessary.



A PHI Company

Date of Submission: _____ Page # _____ of _____

CREF Short Name: _____

Please provide Pepco Account #, Customer Name, and Service Address as stated on the Customer's Bill from Pepco

Subscriber #1

PEPCO Account #: _____ Subscriber Percentage²: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #2

PEPCO Account #: _____ Subscriber Percentage²: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #3

PEPCO Account #: _____ Subscriber Percentage²: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #4

PEPCO Account #: _____ Subscriber Percentage²: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #5

PEPCO Account #: _____ Subscriber Percentage²: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

¹ New Subscriptions to a CREF may take up to 90 days to take effect.² The percentage of the CREF electricity production allocated to this Subscriber for the purpose of calculating the Subscriber's Community Net Metering (CNM) credit.

SECTION II: SUBSCRIBER DELETIONS

Attach additional sheets as necessary.



A PHIL Company

Date of Submission: _____

Page # _____ of _____

CREF Short Name: _____

Please provide Pepco Account #, Customer Name, and Service Address as stated on the Customer's Bill from Pepco

Subscriber #1

PEPCO Account #: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #2

PEPCO Account #: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #3

PEPCO Account #: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #4

PEPCO Account #: _____ Subscriber Percentage⁴: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #5

PEPCO Account #: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

SECTION III: SUBSCRIBER PERCENTAGE CHANGES

Attach additional sheets as necessary.



A PHI Company

Date of Submission: _____ Page # _____ of _____

CREF Short Name: _____

Please provide Pepco Account #, Customer Name, and Service Address as stated on the Customer's Bill from Pepco

Subscriber #1

PEPCO Account #: _____ Subscriber Percentage³: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #2

PEPCO Account #: _____ Subscriber Percentage³: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #3

PEPCO Account #: _____ Subscriber Percentage³: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #4

PEPCO Account #: _____ Subscriber Percentage³: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

Subscriber #3

PEPCO Account #: _____ Subscriber Percentage³: _____

Customer Name: _____

Service Address: _____

City: _____ State: _____ Zip Code: _____

³ The percentage of the CREF electricity production allocated to this Subscriber for the purpose of calculating the Subscriber's Community Net Metering (CNM) credit.

SECTION IV: SUBSCRIBER ORGANIZATION AUTHORIZED SIGNATURE

I hereby certify for the Subscriber Organization that to the best of my knowledge, all of the information provided in this application is complete and true.

Also on behalf of the Subscriber Organization, I consent to permit the PSC and Pepco to exchange information regarding this application, and the customers/subscribers to which this application applies.

Signature: _____ Date: _____

Printed Name: _____ Title: _____

CERTIFICATE OF SERVICE

I hereby certify that a true copy of Potomac Electric Power Company's submission of its proposed Procedural Manual for Implementation and Administration of Community Renewable Energy Facilities was served on the parties of record in Case No. 945 by first class mail, postage prepaid, or electronic mail this 22nd day of June 2015.

Ms. Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street N.W. Suite 800
Washington, DC 20002
bwestbrook@psc.dc.gov

Frann G. Francis, Esq.
Apartment and Office Building
Association of Metropolitan
Washington
1050 17th Street, NW, Suite 300
Washington, DC 20036
ffrancis@aoba-metro.org

Sheila Slocum Hollis, Esq.
Duane, Morris, & Heckscher, LLP
505 9th Street, Suite 1000
Washington, DC 20004-2166
sshollis@duanemorris.com

Herbert Harris, Chairman
Consumer Utility Board
1133 15th Street NW,
Suite 500
Washington, DC 20005
dccub@msn.com

Jay Dillarou
Mid-American Energy
4299 NW Urbandale Drive
Urbandale, IA 50332
info@midamerican.com

Dr. Taresa Lawrence, Esq.
DC Department of the Environment
1200 First Street NE 5th Floor
Washington, DC 20002
taresa.lawrence@dc.gov

Robert I. White
District of Columbia Water
and Sewer Authority
1201 Pennsylvania Avenue, NW
PO Box 407
Washington, DC 20044
rwhite@ssd.com

First Energy Services
341 White Pond Drive
Akron, OH 44320
fesmarketpolicies@fes.com

Melanie Santiago-Mosier
Washington Gas Energy Services, Inc.
13865 Sunrise Valley Dr. Suite 200
Herndon, VA 20171
mmosier@wges.com

Brian J. H. Lederer, Esq.
International Brotherhood of Electric
Workers (IBEW) Local 1900
3003 Van Ness Street, NW
Suite W228
Washington, DC 20008
brian.lederer@att.net

Adam Gusman, Chief Compliance Officer
Glacial Energy of Washington DC, Inc.
24 Route 6A
Sandwich, MA 02563
adam.gusman@glacialenergy.com

Reverend Douglas E. Moore
Moore Energy Resources
Corporation
1300 Newton Street, NW
Washington, DC 20017

Divesh Gupta, Esq.
Constellation NewEnergy, Inc.
111 Market Place, Suite 500
Baltimore, MD 21202
divest.gupta@constellation.com

Brian Caldwell, Esq.
Office of the Attorney General for the
District of Columbia
441 4th Street, NW, Suite 450 North
Washington, DC 20001
brian.caldwell@dc.gov

Jon M. Casadont
AEP Energy, Inc.
363 West Erie Street Suite 700
Chicago, IL 60610
jcasadont@bluestarenergy.com

Sandra Mattavous-Frye
Office of the People's Counsel
1133 15th Street NW, Suite 500
Washington, DC 20005
smfrye@opc-dc.gov

Kenneth G. Hurwitz
Panda-Brandywine, L.P.
1615 L Street, NW, Suite 800
Washington, DC 20036
ken.hurwitz@haynesboone.com

Harris Rosen
Liberty Power
1901 W. Cypress Creed Road Ste 600
Fort Lauderdale, FL 33309
hrosen@liberypowercorp.com

Bernice K. McIntyre
Washington Gas Light Company
101 Constitution Avenue, NW
Washington, DC 20080
bmcintyre@washgas.com

Marc E. Biondi, Esq.
Washington Metropolitan Transit
Authority
600 5th Street, NW
Washington, DC 20001
mebiondi@wmata.com

John Kundert
5640 S. Lamar Street
Denver, CO 80123-0836

Brian T. Castelli
Alliance to Save Energy
1850 M. Street, NW
Suite 600
Washington, DC 20036
bcastelli@ase.org

James Steffes
Direct Energy
12 Greenway Plaza, Suite 600
Houston, TX 77046
james.steffes@directenergy.com

Peter Lowenthal
Maryland-DC-Virginia Solar
Energy Industries Association
4707 Elmhurst Lane
Bethesda, MD 20814
director@mdv-seia.org

Jay L. Kooper
Hess Corporation
One Hess Plaza
Woodbridge, NJ 07095
jkooper@hess.com

Tom D. O'Leary
Horizon Power & Light
800 Bering Drive, Ste. 250
Houston, TX 77057
tom@hplco.com

Telemach N. Chryssikos
Attorney
Washington Gas Energy Services, Inc.
101 constitutions avenue, NW
Washington, DC 20080
macchryssikos@wges.com

Brian R. Greene, Esq.
GreeneHurlocker, PLC
1807 Libbie Avenue, Suite 102
Richmond, VA 23226
bgreene@greenehurlocker.com

Naveen Rabie
Suez Energy Resources NA, Inc.
1990 Post Oak Blvd
Suite 1900
Houston, TX 77056-4499
naveen.rabie@gdfsuezna.com

Coralette Hannon
American Association of
Retired Persons
6705 Reedy Creek Road
Charlotte, NC 28215
channon@aarp.org

Richard Beverly, Esq.
General Counsel
Public Service Commission
of the District of Columbia
1325 G Street N.W. Suite 800
Washington, DC 20005
rbeverly@psc.dc.gov

Leah Gibbons
Reliant Energy Solutions
324 Cedar Lande
Rockville, MD 20851
lgibbons@reliant.com

Barbara L. Burton, Esq.
Assistant People's Counsel
Office of the People's Counsel
1133 15th Street NW, Suite 500
Washington, DC 20005
bburton@opc-dc.gov

Michael Phillips
Nina Dodge
DC Climate Action
Washington, DC 20008
michael.phillips3@verizon.net
ndodge53@gmail.com

Leonard Lucas III, Esq.
General Services Administration
1275 First Street N.E.
5th Floor
Washington, DC 20002
Leonard.lucas@gsa.gov

John B. Britton, Esq.
Schnader Harrison Segal & Lewis, LLP
750 9th Street, NW, Suite 550
Washington, DC 20001
jbritton@schnader.com

Rhone Resch, President
Solar Energy Industries Association
575 7th Street, NW, Suite 400
Washington, DC 20004
rresch@seia.org

Amy Klaviter
Integrays Energy Services
500 West Madison Street
Suite 3300
Chicago, IL 60661
aklaviter@integraysenergy.com

Jay H. Dillavou
Mid-American Energy
4299 NW Urbandale Dr.
Urbandale, IA 50332
jhdillavou@midamerican.com

Brian White
Sempra Energy Solutions
401 West A Street, Suite 500
San Diego, CA 92101
bwhite@semprasolutions.com

Barbara Clay
General Counsel and Senior Vice President
Public Power, LLC
1055 Washington Blvd., 7th Floor
Stamford, CT 06907
bclay@criusenergy.com

A handwritten signature in blue ink, appearing to read "Peter E. Meier", is positioned above a horizontal line.

Peter E. Meier