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August 6, 2018

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

**Re: Formal Case No. 1119, 1017 & PEPPOR-2018-01**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Reply Comments to Order No. 19387 in the referenced proceeding.

Please feel free to contact me if you have any questions regarding this matter.

Sincerely,



Dennis B. Jamouneau

Enclosure

cc: All Parties of Record

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

<b>IN THE MATTER OF</b>	)	
	)	
<b>THE JOINT APPLICATION OF EXELON</b>	)	
<b>CORPORATION, PEPCO HOLDINGS, INC.,</b>	)	
<b>POTOMAC ELECTRIC POWER COMPANY,</b>	)	<b>Formal Case No. 1119</b>
<b>EXELON ENERGY DELIVERY COMPANY, LLC,</b>	)	
<b>AND NEW SPECIAL PURPOSE ENTITY, LLC,</b>	)	
<b>FOR AUTHORIZATION AND APPROVAL OF</b>	)	
<b>PROPOSED MERGER TRANSACTION</b>	)	
	)	
<b>THE DEVELOPMENT AND DESIGNATION OF</b>	)	
<b>STANDARD OFFER SERVICE IN THE DISTRICT</b>	)	<b>Formal Case No. 1017</b>
<b>OF COLUMBIA</b>	)	
	)	
<b>AND</b>	)	
	)	
<b>POTOMAC ELECTRIC POWER COMPANY'S</b>	)	<b>PEPPOR-2018-01</b>
<b>PURCHASE OF RECEIVABLES PROGRAM</b>	)	

**POTOMAC ELECTRIC POWER COMPANY'S**  
**REPLY COMMENTS TO ORDER NO. 19387**

On February 14, 2018, Potomac Electric Power Company (“Pepco” or “Company”) filed its “Motion for Approval of Method to Recover Costs Related to Forgiven Arrearages” (“Motion”), which requested that the Public Service Commission of the District of Columbia (“Commission”) approve methodologies to allow the Company to recover certain costs related to the Arrearage Management Program (“AMP”) so that Pepco can build the IT infrastructure necessary to implement AMP in the District of Columbia. On June 20, 2018, the Commission issued Order No. 19387 (“Order No. 19387”), which granted Pepco’s Motion, in part, and directed interested persons to file comments and reply comments within 30 and 45 days, respectively.

The National Consumer Law Center (“NCLC”), the Office of the People’s Counsel (“OPC”), and the Apartment and Office Building Association of Metropolitan Washington (“AOBA”) filed comments on Pepco’s Motion. In its initial comments, NCLC supports the proposed AMP and urges the Commission to timely resolve the cost recovery issue brought forward in Pepco’s Motion. OPC, in its initial comments, represents that it does not oppose Pepco’s Motion. AOBA is the only entity that filed in opposition to Pepco’s Motion. The following reply comments respond to AOBA.

## REPLY COMMENTS

### A. BACKGROUND

Following Pepco’s October 28, 2016 submission of its AMP plan, the Commission in Order No. 18799 directed Pepco, as part of its next base rate proceeding, to propose a method to account for arrearages that are to be forgiven in the AMP program.<sup>1</sup> Order No. 18799 also set forth several other directives to be discussed and decided upon by a working group prior to the implementation of AMP.<sup>2</sup> In the working group, parties discussed means to comply with the Commission’s directives, including additional IT infrastructure the Company required to support and implement the AMP. During the working group, parties acknowledged that cost recovery and cost allocation were issues that required resolution by the Commission before Pepco can begin to build the IT

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<sup>1</sup> Order No. 18799 at P 80.

<sup>2</sup> *Id.* at PP 85-92 (P 86 required the working group to review LIHEAP eligible programs and determine what would be needed for those customers to enroll in year 2 of the AMP; P 87 required the working group to develop a plan to apply LIHEAP funds to customer arrearages prior to enrollment; P 88 required the working group to define “extenuating circumstances;” P 89 required the development of an outreach and educational plan; P 90 required the working group to issue an RFP for a Third-Party Evaluator; P 91 required the working group to send materials to customers; P 92 required the working group to ensure that data collected in the AMP was in sufficient detail to allow arrearages for supply services to be appropriately allocated).

infrastructure necessary to support the AMP. Accordingly, as part of several working group meetings, Pepco consulted the working group participants and presented a plan to file a motion to request additional Commission guidance concerning how Pepco could account for and, later, recover amounts related to forgiven arrearages.

Pepco's Motion, filed February 14, 2018, was the culmination of a months-long process and secured the agreement of several key stakeholders—the District Department of Energy and the Environment, NCLC, and the Legal Counsel for the Elderly. In addition, in its initial comments, OPC did not oppose the Motion and the guidance sought. On February 26, 2018, however, AOBA filed a Response (“AOBA Response”) to Pepco's Motion, opposing the Motion and requesting that the Commission direct Pepco to implement AMP without delay. In its Response, AOBA claimed that Pepco's Motion should be denied as a collateral attack on Order No. 18799.<sup>3</sup> Specifically, AOBA argued that Order No. 18799 clearly explained that the Company's next rate case was the appropriate forum to review the recovery of costs related to AMP and that the administrative costs related to AMP are “basic utility operations.”<sup>4</sup>

In initial comments to Order No. 19387, AOBA generally repeats arguments from its Response. The only added feature of AOBA's comments to the AOBA Response is a request that the Commission rescind the portion of Order No. 19091 that permitted Pepco to establish a regulatory asset to capture and track certain AMP-related costs.<sup>5</sup>

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<sup>3</sup> See, e.g., AOBA Response at 5-7. Pepco filed a “Motion for Leave to Reply and Reply to AOBA's February 26, 2018 Response,” explaining why Pepco's Motion was not improper both legally and practically.

<sup>4</sup> AOBA Response at 6 (citing Order No. 18799 at P 80).

<sup>5</sup> Order No. 19091 at P 7.

The Commission has the authority to grant the Motion in full. In addition, granting the Motion will allow Pepco to implement the AMP in a more efficient and timely manner and, while Pepco's approach does not require upfront review in a base rate case, it is critical that the method to allocate and collect arrearages is determined prior to IT system work. Finally, AOBA's arguments to rescind portions of Order No. 19091 are misplaced and factually incorrect. For these reasons and as explained in more detail below, the Commission should grant the relief requested in Pepco's Motion.

## B. REPLY COMMENTS

1. *The Commission Has Authority to Grant Pepco's Motion and the Relief Requested in the Motion Will Minimize Delay and Allow for a More Efficient Implementation of AMP.*

AOBA's comments begin by explaining that AOBA supports programs that provide low-income assistance in order to ensure that low-income customers have access to electricity service.<sup>6</sup> Pepco, of course, agrees and further submits that the entire purpose of the Motion is to implement AMP in the most efficient manner possible, and without any additional delay so that qualifying customers can begin to participate in this beneficial program. It cannot be overstated that each of the stakeholders whose constituents would benefit from AMP either support Pepco's Motion or have stated that they do not oppose it.

AOBA, however, continues to argue that Pepco's Motion is legally improper because the Commission already addressed cost recovery in Order No. 18799 and clarified and affirmed recovery-related issues in Order No. 19091.<sup>7</sup> AOBA also stresses that each request in Pepco's

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<sup>6</sup> AOBA Comments at 6.

<sup>7</sup> *Id.* at 6.

Motion—which asks for guidance with respect to the methods of recovery for distribution and supply costs—has been adequately addressed in Order Nos. 18799 and 19091.

To state the obvious, Pepco does not dispute that rehearing of Order No. 18799 would have been the most efficient vehicle to gain the clarifications it is requesting in the Motion. However, only after further discussions with the working group, which fell well outside of the time to request reconsideration of Order No. 18799, did it become clear that such clarification was necessary. Further, the standard—which AOBA cites repeatedly in its Response as well as its comments—is that a party may not raise arguments on reconsideration (or after) that, with due diligence, could have been raised earlier in the proceeding.<sup>8</sup> Pepco’s Motion makes clear, as does each pleading Pepco has filed since, that IT issues were discovered after Order Nos. 18799 and 19091 that required further clarification. Even if the Commission does not agree that Pepco’s Motion meets this standard, under D.C. Code 34-608, the Commission retains the authority “at any time, [to] rescind, alter, modify, or amend its order.” Accordingly, there is no legal barrier to granting the relief requested in Pepco’s Motion. The Commission should grant the Motion and allow Pepco to begin implementation as soon as possible in the way that Pepco has determined will minimize unnecessary costs.

More specifically, and as discussed above and previously, through the course of the working group meetings and the additional issues discussed therein, Pepco discovered that the IT system could not be built in the abstract and without certainty regarding how to account for costs, both distribution and supply. As noted above, Order No. 18799 presupposes that supply-related arrearages forgiven will be reviewed in the next base rate proceeding, and that actual costs will dictate the “specific determination as to the best approach” or method to follow to recover those

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<sup>8</sup> AOBA Comments at 16 (citing Formal Case No. 1119, Order No. 18054 at P 30).

costs. The AMP, however, will rely on detailed information, both to ensure that participating customers receive the proper amount of arrearages forgiven and that the arrearages forgiven are allocated to the proper cost center for later recovery. Order No. 18799 did not address how these costs would be forgiven and only after later discussions with the working group did Pepco believe it necessary to attain Commission approval so that the system could be properly built. This point, perhaps more than any other, demonstrates the fallacy in AOBA's arguments against the Motion. Taking AOBA's argument at its face, AOBA would have preferred that Pepco implement AMP shortly after the Commission issued Order No. 18799 or Order No. 19091, the latter which was dated September 8, 2017. However, to do so would have been irresponsible and could have caused unnecessary costs to be incurred by Pepco if it allocated certain forgiven arrearages in a manner that, months later, was determined to be unreasonable by other parties and, ultimately, the Commission. Thus, program costs may have been unnecessarily expended and it is likely that the program would have been interrupted while those issues were fixed. It is also likely that the customers that would have participated in AMP would have been affected, particularly if the program was suspended pending IT changes. The stakeholders whose constituents would benefit from AMP clearly understood this when they supported—or in OPC's case, did not oppose—Pepco's Motion.

*2. The 2017 Rate Case Could Not Appropriately Determine the Proper Methods to Allocate and Recover AMP Costs, and Pepco is Not Requesting Pre-Approval of any Costs.*

Pepco could not, as AOBA suggests, have simply filed for approval of a method to recover AMP costs in Formal Case No. 1150. That case, which is now pending before the Commission, is based on a 2017 test year and would have presented no actual costs related to AMP. This, in turn, would mean that parties and the Commission would be making determinations based on

estimates or hypothetical information. However, using estimates or hypothetical information is contrary to the baseline presumed in Order No. 18799, which stated that accounting for supply-related arrearages could be determined after actual data was reviewed.<sup>9</sup> Moreover, as AOBA itself points out, this argument is mooted by the fact that Formal Case No. 1150 is now awaiting decision by the Commission.

AOBA next claims that Pepco's "request for preapproval of a cost recovery mechanism before implementation of AMP is contrary" to the non-unanimous settlement in Formal Case No. 1150,<sup>10</sup> and specifically Paragraph No. 17 of the filed Settlement.<sup>11</sup> That assertion is nonsensical. Paragraph No. 17 of the Settlement provides:<sup>12</sup>

**Rate Case Moratorium.** The Parties agree that there shall be a moratorium on the filing of base rate change applications by Pepco or petitions to institute an investigation into the reasonableness of rates by any Party until May 1, 2019.

Nothing in Pepco's Motion directly or indirectly subverts any provision in the Settlement, including Paragraph 17 referenced above. Pepco's Motion does not request a change in rates. Nor does the Motion ask for a prudency determination regarding any costs it will be incurring in the AMP. Instead, the Motion requests that the Commission determine the proper method to follow when the costs are later reviewed and when later prudency determinations are made and, for

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<sup>9</sup> See Order No. 18799 at P 8 ("However, Pepco is correct that both the SOS and POR programs as currently constructed under Commission rules and orders would not allow for the recovery of AMP costs. With more information, *and actual data*, the Commission can reach a specific determination as to the best approach")(emphasis added to original).

<sup>10</sup> AOBA Comments at 8.

<sup>11</sup> *Id.*

<sup>12</sup> *In the Matter of the Application of Potomac Electric Power Company for Authority to Increase Existing Retail Rates and Charges for Electric Distribution Service*, Formal Case No. 1150, pg. 17 (April 17, 2018).

distribution-related costs, it simply requests that the Commission affirm that those costs will be reviewed in the same manner as uncollectible costs have been under current practice.

3. *The Costs Included in the Regulatory Asset Are Not Ordinary Business Expenses.*

AOBA's only new argument states the Commission should rescind the portion of Order No. 19091 that Pepco be permitted to track and account for costs related to retaining a Third-Party Administrator and IT/AT costs in a regulatory asset.<sup>13</sup> AOBA's position, which relies heavily on its belief that Third-Party Administrator and IT/AT costs are "ordinary business expenses,"<sup>14</sup> should be rejected.

In Order No. 19091, the Commission recites Pepco's arguments on reconsideration that explain why costs related to the Third-Party Evaluator and those related to the IT/AT infrastructure needed to implement the AMP are non-routine because "these costs for a third-party evaluator are incremental, are required to implement a program that is new and unrelated to any other Pepco distribution function, and are not otherwise reflected in Pepco's distribution cost of service."<sup>15</sup> On that basis, the Commission stated that it was "persuaded by Pepco's arguments on reconsideration that expenses related to the AMP such as those for the Third-Party Administrator [] and recognize

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<sup>13</sup> Order No. 19091.

<sup>14</sup> AOBA Comments at 16 ("...the Commission granted the Company's request to track ordinary business expenses related to Pepco's recovery of costs to implement and administer the AMP through a regulatory asset..."), 17 ("AOBA submits that the Commission should return to historical precedents whereby utility cost recovery of ordinary operating expenses are best determined in a base rate proceeding..."), 17 ("The Commission has historically rejected the routine approval of regulatory asset treatment of 'basic utility operations expenses'..."), 18 ("In Formal Case No. 1137, the Commission rejected approval for a regulatory asset to recover certain deferred utility costs in future base rate cases because the ordinary business expenses are not generally assigned regulatory asset treatment.").

<sup>15</sup> Order No. 19091 at P 7 (quoting Pepco's Application for Reconsideration at 4-5).

that the same argument would extend to the AT/IT costs[]” should be tracked in a regulatory asset.<sup>16</sup> Nothing in AOBA’s comments suggest that the basis on which the Commission made this decision has changed. As explained previously, costs related to a Third-Party Evaluator for an AMP are incremental and not ordinary for the utility in any sense. The same can be said for the work required for AT/IT, which are incremental and would not have been needed but for the AMP. Moreover, neither cost is reflected in current distribution rates. Even though AOBA appears concerned that “the routine approval of regulatory asset treatment of ‘basic utility operations expenses’ as a method of recovery” may “strengthen[] a utility’s claim that the expense was prudently incurred,”<sup>17</sup> Pepco understands its obligation to incur costs in a way that is both reasonable and prudent. Nothing has changed since the Commission made its decision with respect to the regulatory asset in Order No. 19091 and the costs included in the regulatory asset are not typical or “ordinary” costs incurred by Pepco. For these reasons, Pepco respectfully requests that the Commission not modify this ruling.

## CONCLUSION

For the foregoing reasons, Pepco respectfully requests that the Commission grant Pepco’s February 14, 2018 Motion.

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<sup>16</sup> Order No. 19091 at P 7.

<sup>17</sup> AOBA Comments at 17-18 (quoting Order No. 18799 at P 80 and Order No. 15540, Formal Case No. 1076, at P9).

Respectfully Submitted,

**POTOMAC ELECTRIC POWER COMPANY**

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Counsel for Potomac Electric Power Company

August 6, 2018

## CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Arrearage Management Program was served this August 6, 2018 on all parties in Formal Case No. 1119, 1017 & PEPPOR by electronic mail.

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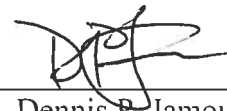
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