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September 25, 2019

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

**Re: RM41-2017, Order No. 19761
Timeline to Implement Accelerated Switching**

Dear Ms. Westbrook-Sedgwick:

On December 5, 2018, the Public Service Commission of the District of Columbia (Commission) issued Order No. 19761 (Order) in the above-referenced docket and directed Potomac Electric Power Company's (Pepco) to implement accelerated third-party supplier switching by September 10, 2019 in accordance with revised Rule 4105.9. Pepco filed proposed tariffs on June 18, 2019¹ to effectuate the changes required by the Commission's Order. On August 30, 2019, the Commission issued a Notice of Proposed Tariff (NOPT) regarding Pepco's proposed tariffs. This NOPT required comments by September 30, 2019.

This letter is to advise the Commission and stakeholders of additional time needed to meet the directives of the Order and, in part, request waiver of the Rule with respect to certain customers if the Commission determines such waiver is necessary at this time.²

Due to resource issues, and in order to perform proper testing prior to implementation of accelerated switching, Pepco will require additional time to comply with Rule 4105.9. Based on the current amount of work that is required and assuming no further emergent issues develop, Pepco anticipates that accelerated switching can be implemented in the District by the end of October 2019 for most customers.

However, for Net Energy Metering (NEM) customers that switch, additional complexities have arisen due to the fact that some of these customers may have net exports throughout the month, and Pepco needs to ensure that its systems' internal logic is developed

¹ Pepco's original submission of proposed tariffs was submitted on April 17, 2019 and was revised on May 22, 2019.

² Based on the expected timing of the Commission's action on the NOPT, waiver may be necessary because the new tariffs may be in effect before Pepco's systems are able to accommodate accelerated switching.

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throughout the month, and Pepco needs to ensure that its systems' internal logic is developed to properly capture usage to send to suppliers for billing in the event that an NEM customer switches suppliers mid-billing period. The logic for this scenario has not been developed or tested, and necessarily must be developed after the testing for the general accelerated switching that can be implemented by the end of October 2019. Thus, for this subset of NEM customers that switch third-party suppliers, Pepco is requesting that accelerated switching be delayed until March 2020.

Pepco recognizes that the Commission is still considering Pepco's proposed Tariff changes to comply with Order No. 19761 and, thus, that this letter may not be necessary given that Pepco cannot implement accelerated switching until its Tariff changes have been approved. Nonetheless, out of an abundance of caution and due to the additional issues arising out of accelerated switching for NEM customers, Pepco wanted to explain the status of its efforts and request waiver, as needed.

Please contact me if you have any further questions.

Sincerely,



Dennis P. Jamouneau

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Timeline to Implement Accelerated Switching filing was served this September 25, 2019 on all parties in Formal Case No. 712 and Docket RM41-2017-01 by electronic mail, hand delivery, or first class mail, postage prepaid.

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