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October 30, 2019

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 Nos. 1130 and 1155

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's ("Pepco") Transportation Electrification Implementation Plan in response to Order No. 19898, as clarified by Order No. 19983 in the above referenced proceeding.

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

Sincerely,

A handwritten signature in dark ink, appearing to be "DJP", written over a printed name.

Dennis P. Jamouneau

Enclosures

cc: All Parties of Record

TRANSPORTATION ELECTRIFICATION – IMPLEMENTATION PLAN

I. BACKGROUND

A. ORDER NO. 19898

On April 12, 2019, the Public Service Commission of the District of Columbia (“Commission”) issued Order No. 19898, approving in part and denying in part Potomac Electric Power Company’s (“Pepco”) September 6, 2018 application in this proceeding. Pepco is excited about the opportunity to partner with the District to further its clean energy and sustainability goals and is looking forward to taking this first step toward the electrification of the transportation sector in the District. Specifically, and as pertinent to this implementation plan, the Commission:

- Approved Pepco to provide “make ready” infrastructure to support electric vehicle charging stations (“EVCS”) under Offerings 7, 8, 10, and 11, and directed Pepco to file any necessary updated tariffs to facilitate deployment of EVCS—Order No. 19898 at P 33.
- Approved Offering 1, for a residential whole-house-time-of-use offering and directed Pepco to file an updated tariff that provides detailed information concerning generation, transmission, and distribution rates for that offering—Order No. 19898 at P 36.
- Approved Offerings 7 and 8, which allow for up to 55 public charging stations, and permit Pepco to provide “make ready” infrastructure to support those offerings, and also directed Pepco to detail the specific SOS and distribution rates for the chargers—Order No. 19898 at P 49.
- Approved Offering 10, which relates to deployment of “make ready” infrastructure for taxi and rideshare services, and directs Pepco to update its tariffs as necessary to ensure that EVCS owners/operators can offer service under these tariffs—Order No. 19898 at P 51.
- Approved Offering 11, for deployment of “make ready” infrastructure for public busing, and develop necessary tariffs for the owner/operator—Order No. 19898 at P 53.
- Approved the creation of a regulatory asset to track EV expenditures for “make ready” infrastructure and for the coordination/management expenses such as billing, customer enrollment and outreach, program management, system interface and updates, and analysis and reporting—Order No. 19898 at P 58.
- Directed Pepco to refile program coordination and management expenses, as described above, within 60 days—Order No. 19898 at P 58.
- Directed Pepco to file quarterly reports for the first two years and semi-annual reports for years three through five after implementation—Order No. 19898 at P 63.

B. ORDER NO. 19983

On August 2, 2019, the Commission issued Order No. 19983, its order on reconsideration of Order No. 19898. In Order No. 19983, the Commission addressed the various applications for reconsideration and clarification by the parties. As pertinent to this implementation plan, the Commission:

- Clarified the timelines tied to the filing of (1) an updated implementation plan, including any necessary tariff updates to address “make ready” infrastructure as well as any necessary tariffs for Offerings 1, 7, 8, 10, and 11 and (2) updated cost information for program coordination and management expenses within 90 days of Order No. 19983—Order No. 19983 at P 28.
- Directed Pepco to work with interested stakeholders in the TE Working Group to determine the site selection, easement, and EVCS owner/operator selection process for make-ready infrastructure for Offering 10 – Order No. 19983 at P 28.

II. PLAN TO IMPLEMENT ORDER NOS. 19898 AND 19983

A. Make Ready Infrastructure

Based on the illustration in paragraph 32 of Order No. 19898, “make-ready” is EVSE construction work extending past the EV conduit and the meter up to, but not including the EV charger.

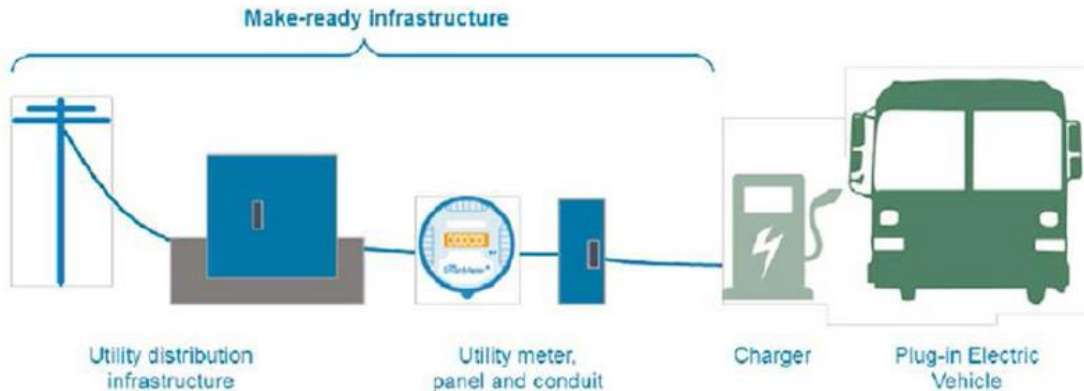


Figure 1: Formal Case No. 1130, EVgo Reply Comments at 3. (“This graphic illustrates the concept of make-ready infrastructure. Source: PG&E.”)

As directed in paragraph 33 of Order No. 19898, Pepco has determined that it is necessary to update its General Terms and Conditions to include additional language to support the deployment of “make ready” infrastructure to facilitate EVCSs.

The proposed modification to the General Terms and Conditions is provided in Attachment A and, in pertinent part, states as follows:

The Company will also install, and own service connections referred to as “make ready infrastructure,” as defined and limited by the Public Service Commission in Order No. 19898 (paragraph 32 and 33), to support the installation and operation of electric vehicle charging in the District of Columbia. This “make ready” work consists of the service connection and supply infrastructure to support electric vehicle charging comprised of the electrical infrastructure from the distribution circuit to the stub of the Electric Vehicle Supply Equipment (EVSE). It can include equipment on the utility-side (e.g. transformer) and customer-side (e.g. electrical panel, conduit, wiring) of the meter. Notwithstanding any other provisions in Sections 10 or 11 of these General Terms and Conditions, the installation of “make ready infrastructure” as defined above will have no cost to the customer/Applicant.

B. Tariff for Offering 1 - Whole House Time-of-Use Rate

As directed in Order No. 19898 and clarified in Order No. 19983, the attached proposed tariff for Offering 1—Whole House Time of Use—disaggregates the generation, transmission and distribution rates for this offering. Specifically, Attachment B includes a “Residential Service – Plug-In Vehicle Charging” whole house time-of-use tariff that provides distribution, generation, and transmission rates for customers receiving service under this schedule with a TOU component for Generation. The time-of-use components of the Standard Offer Service (“SOS”) Generation Service Charges included in Schedule “R-PIV” were calculated using on-peak and off-peak multipliers designed to reflect underlying costs specific to the Pepco zone in PJM, including locational marginal prices, generation obligation costs, and PJM ancillary services costs. Further, the updated Schedule “R-PIV” SOS rates are designed to be revenue neutral when compared to Schedule “R” SOS rates. Consistent with its practice for designing time-of-use rates in its Maryland jurisdiction, the actual SOS time-of-use rates for Schedule “R-PIV” were calculated using the on-peak and off-peak multipliers and the currently effective summer and winter Schedule “R” SOS Generation Service Charge rates.

Further, pursuant to Order No. 19898¹ the Company has included a “Plug-In Vehicle – Green Rider” (or Rider “PIV-GREEN”) tariff as Attachment C. The value of Rider “PIV-Green” reflects the incremental cost, on a cent per kWh basis, to procure 100% renewable energy over and above that which is currently procured by the Company for the SOS product per the Renewable Energy Portfolio Standard. The Company is proposing to update the rider on or about February 1st and August 1st of each year, thereby matching the frequency with which it updates a similar rider in its Maryland jurisdictions.

¹ See Order No. 19898 at P 12: “...the Commission likewise finds no issue with the optional Green Adder, which provides 100% renewable electricity for EV charging.”

C. Offerings 7, 8, 10, and 11 – Rates

Order No. 19983 allows Pepco to file tariffs for SOS and distribution rates if necessary for Offerings 7, 8, 10, and 11. *See* Order No. 19983 at PP 49, 51, and 53. After consideration of these offerings and types of demand and load that will be used for these offerings, Pepco would recommend using existing rate schedules to provide service until further consultations with stakeholders indicate a need to otherwise modify existing or create new tariffs. The determination of the rate schedules for customers participating under these offerings will be based on the currently-approved tariffs and the demand/usage characteristics specified in those rate schedules.

D. Program Coordination and Management Expenses

Based on Pepco’s review of the implementation requirements and components, the updated estimated cost for implementing the program is approximately \$4.3 million.

Offering No.	Program Component	Size (Units)	Estimated Costs ²
1	Residential Whole House TOU	Unlimited	-
7	Public Smart Level II EVSE Make-Ready	35	262,500
8	DC Fast Chargers Make-Ready	20	1,650,000
10	Electric Taxi/Rideshare Infrastructure Make-Ready	12	395,000
11	Electric Bus Infrastructure Make-Ready	6	540,000
	Billing System Updates		16,800
	Customer Enrollment and Outreach ³		500,000
	Program Management ⁴		880,000
	Analysis & Reporting		75,000
	Total Estimated Costs		\$4,319,300

Pepco notes the cost for “make-ready” work will be site specific. The make-ready costs provided in the table above are estimates based on the figures from the Company’s original application (excluding the cost of the EVSE). The Company will have more specific information after the program commences, sites have been selected, and engineering reviews have occurred.

E. Implementation of Approved Offerings

Implementation of the approved offerings, which include Offering 1 and those offerings that direct Pepco to provide “make ready” infrastructure, depend on many factors, including Commission approval of the tariffs included in this implementation plan. If Pepco receives

² Estimated construction costs do not include O&M costs related to capital projects.

³ Costs over the duration of the approved program

⁴ *Id.*

approval of the attached tariffs by January 1, Pepco could begin implementation of the approved offerings by February 1, 2020 with the program commencing March 1, 2020 under Pepco/Exelon Corporation's EVSmart branding. Upon commencement of the program, the Company's EV website:

<https://www.pepco.com/SmartEnergy/InnovationTechnology/Pages/ElectricVehicleProgramDC.aspx>

will be updated to feature the program's anticipated available offerings (Offerings 1, 7 and 8).

1. Offering 1 – Whole House TOU Rate

- Pepco's EV website will contain a section dedicated to the new TOU rate and optional "Plug-In Vehicle-Green" rider. Educational material will be featured to assist customers in determining whether it would be advantageous for them to move to the Whole House TOU rate as well as an application. Interested customers will be directed to complete and submit the application, which will be reviewed by Pepco. Customers who have been approved by Pepco will be notified and moved to the new rate in Pepco's billing system.

2. Offerings 7 and 8 – Public Charging

- An application will be provided on the EV website for "make-ready" work for the installation of the 35 Level II and 20 DCFC chargers. The application will be similar to the Company's current application for new electric service and modified for the applicable EV charging program. Pepco will require all applicants to provide information including, but not limited to:
 - Site information
 - Services requirement (load)
 - Charging equipment (the number and type: Level II or DCFC)
 - Location of the charging equipment

In addition, the applicant will be responsible for the charging equipment, the easement and completing all permits and inspections required to interconnect to Pepco facilities. The section of the website will also feature Pepco's recommended criteria (described later in this section) for approving applications.

- To alleviate concerns about the timing of application submissions, Pepco proposes accepting initial applications over a period of 30 days. All applications received over that 30-day period will be reviewed in the sequence in which they are submitted, however the timing of the submission will not be factored into the approval criteria. The application process will reopen for additional submissions until the total number of approved chargers has been exhausted. Should Pepco receive applications for chargers deemed eligible for the program, yet above the number approved in Order

No. 19898, the Company may submit a subsequent request to the Commission to expand the number of EVSE available for public charging.

- Upon receipt of the submissions for each application window, Pepco will review the applications and conduct field visits for the requested sites. In general, Pepco will require applications meet the following standards to be considered for “make ready” approval:
 - Requests must be for new EVSE only and will not be applicable for existing or stations currently under construction
 - Locations will not negatively impact reliability to customers of the District of Columbia or the electric system performance
 - Service requests must be a reasonable distance from the final Pepco element
 - The mounting pad will be a standard size

- In determining which applications advance through the review process, Pepco will take into consideration the estimated cost of the make-ready work in addition to engineering requirements such as available load and feeder capacity. While applications will be evaluated on a case-by-case basis, Pepco recommends that approval of applications be limited to those applications whose cost does not exceed \$75,000 and require minimal to no additional upgrades to the distribution system. Pepco will also consider criteria, such as the maximum number of ports per EVSE station, that will be recommended by the TE Working Group in its final report. Finally, as noted in paragraph 49 in Order No. 19898, Pepco will coordinate with DDOT on the final selection for applicants recommended for approval based on Pepco’s criteria. Timing for the location requests approved by Pepco and DDOT will depend on multiple factors and will not be determined until engineering review.

3. Implementation of Offerings 10 and 11

- As directed by the Commission, Pepco will determine the process for implementing the make-ready for taxi/rideshare EVSE (Offering 10) as part of the TE Working Group and additional coordination with District agencies. Upon development of these recommendations and conclusion of the working group in January 2020, Pepco will update the implementation plan to include a process for executing Offering 10.

- As directed by the Commission in paragraph 53 of Order No. 19898, Pepco will coordinate with WMATA, DDOT and other appropriate agencies in the development and deployment of Offering 11 prior to the commencement of the EVSmart program. Once all components are determined, Pepco will update the implementation plan to include a process for executing Offering 11.

F. Education and Outreach

Pepco's education and outreach plan will consist of customer research, message development and channel analysis and selection. Pepco's education and outreach efforts will involve both general EV messaging as well as program specific messaging. The Company's EV website will be updated to feature the "EV digital toolkit", an interactive web-based tool to educate customers on the benefits of EVs and allow them to calculate their cost and commuting savings in addition to their environmental impact for switching to an EV. With the investment in EV infrastructure build out, it is important customers be aware of resources to help them decide whether an EV is right for them.

The Company will conduct outreach with customers which can consist of community engagement events, digital advertising, direct mail and bill inserts to educate customers of the investment in infrastructure in their areas and to highlight the availability of the TOU rate and the optional Rider "PIV-Green." Pepco will also coordinate with District agencies where appropriate to increase awareness of available public, taxi/rideshare and bus offerings both pre and post-commencement.

G. Reporting

Order No. 19898, paragraph 63, directs Pepco to begin quarterly reporting for the first two years, and semi-annual reporting for years three through five after implementation begins. Accordingly, Pepco will begin quarterly reporting within 90 days after approval of the implementation plan, and subsequent quarterly reporting will be made approximately 90 days following the initial quarterly report.

Attachment A

CLEAN



DC

Electric--P.S.C. D.C. No. 1
Ninth Revised Page No. 1

GENERAL TERMS AND CONDITIONS

FOR FURNISHING ELECTRIC SERVICE

IN THE

DISTRICT OF COLUMBIA



10. SERVICE CONNECTIONS

a. General

The Company's practice shall be to provide service connection facilities which, in its judgment, will assure to the Applicant or Customer safe, adequate and reasonable electric service to meet their requirements commensurate with accepted industry standards and practices.

A service connection will normally include those facilities installed by the Applicant or the Company on private property or within the vertical projection of the outermost structural component of the facility served, to the first terminal point for each service location at or in the building or facility to be served. This will also include facilities deemed necessary by the Company to interconnect existing or future Customers adjacent to the premises being served, as well as those facilities installed elsewhere and dedicated to connecting the Company's common distribution system to the point of termination of the Company's service conductors.

A normal service connection will be supplied in accordance with subsections a. through d. of this Section. The Company, upon request, to the extent reasonably practicable will supply a service connection in excess of or different from a normal installation consistent with the Company's practice set forth above ("Customer Plan"). Applicants shall furnish and install those items specified and shall contribute toward the Company's cost of furnishing and installing its facilities as specified in subsection e. of this Section.

The Company will also install and own service connections referred to as "make ready infrastructure," as defined and limited by the Public Service Commission in Order No. 19898 (paragraph 32 and 33), to support the installation and operation of electric vehicle charging in the District of Columbia. This "make ready" work consists of the service connection and supply infrastructure to support electric vehicle charging comprised of the electrical infrastructure from the distribution circuit to the stub of the Electric Vehicle Supply Equipment (EVSE). It can include equipment on the utility-side (e.g. transformer) and customer-side (e.g. electrical panel, conduit, wiring) of the meter. Notwithstanding any other provisions in Sections 10 or 11 of these General Terms and Conditions, the installation of "make ready infrastructure" as defined above will have no cost to the customer/Applicant.

All facilities installed by the Applicant which will be used to enclose, protect, support or provide termination for Company-owned facilities shall be approved by the Company.

The usual practice is for the Company to provide a single service connection. However, where the electrical demands of the service are too extensive for a single service connection to be practical multiple service connections may be required. When multiple connections are deemed necessary by the Company, the Applicant will shift load wherever practicable from one service location to another to more advantageously balance the loads.

Any relocation or alteration of Company-owned facilities may be made only with the approval of the Company and shall be at the expense of the party requesting the change or who is responsible therefore, if such change is occasioned by:

1. A request for relocation or alteration of such facilities, or
2. Structural changes on the premises served, or
3. Other private construction work being performed (or to be performed) which jeopardizes the safe and normal operation of existing electric facilities in the area.

When service to a premises is discontinued, the Company will leave any or all of its service connection facilities in place, if permitted to do so, when in the opinion of the Company the facilities are reasonably protected and are likely to be used again at that location within a reasonable time. Company-owned service connection facilities will be removed (or, if underground, abandoned at the option of the Company) upon request of the Owner or other proper party.

If the projected demand of the service connection requested by the Customer ("Customer Plan") is in excess of the projected demand of the Company Plan, in addition to paying a contribution in aid of construction for the local facilities, the Customer will be subject to the charges specified in Excess Facilities - Rider "EF". Under the terms of that Rider, a contract demand will be set equal to the difference between the projected kilowatt demand of the Customer Plan and the Company Plan. If the actual metered demand for that account reaches at least 90% of the Capacity of the Customer Plan for any twelve billing months within five years of the date that the facilities were installed, the Company will refund to the customer the contribution in aid of construction associated with those excess facilities and the amount collected through Rider "EF". A written contract with a minimum term of 5 years will be required for Customers taking service under Rider "EF". In the event that the Customer terminates service earlier than five years the Customer will be responsible for making the remainder of the payments in a lump sum.

REDLINE



DC

Electric--P.S.C. D.C. No. 1
Ninth Revised Page No. 1

GENERAL TERMS AND CONDITIONS

FOR FURNISHING ELECTRIC SERVICE

IN THE

DISTRICT OF COLUMBIA



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A normal service connection will be supplied in accordance with subsections a. through d. of this Section. The Company, upon request, to the extent reasonably practicable will supply a service connection in excess of or different from a normal installation consistent with the Company's practice set forth above ("Customer Plan"). Applicants shall furnish and install those items specified and shall contribute toward the Company's cost of furnishing and installing its facilities as specified in subsection e. of this Section.

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2. Structural changes on the premises served, or
3. Other private construction work being performed (or to be performed) which jeopardizes the safe and normal operation of existing electric facilities in the area.

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Attachment B

RESIDENTIAL SERVICE – PLUG-IN VEHICLE CHARGING

SCHEDULE "R-PIV"

AVAILABILITY

Available to customers who own or lease a plug-in vehicle with an electric range of greater than 30 miles which requires electric service to provide periodic battery charging and who would otherwise be eligible to take electric service under Schedule "R." The service supplied under this schedule is for both electric requirements for residential purposes as well as Plug-in Vehicle ("PIV") battery charging purposes. All electricity provided under this schedule is delivered through the same meter. Net Energy Metering customers are eligible for this Schedule "R-PIV."

CHARACTER OF SERVICE

The service supplied under this schedule normally will be alternating current, sixty hertz, single phase, three wire, 120/240 volts, or three wire, 120/208 volts.

MONTHLY RATE

	Summer	Winter
Distribution Service Charge		
Customer Charge – Residential	\$15.09 per month	\$ 15.09 per month

Kilowatt-hour Charge

First 400 kilowatt-hours	\$ 0.00800 per kwhr	\$ 0.00800 per kwhr
In excess of 400 kilowatt hours	\$ 0.02283 per kwhr	\$ 0.01594 per kwhr

Generation and Transmission Service Charges – Customers will receive Generation and Transmission Service, including the Procurement Cost Adjustment, from the Company under the provisions of Rider "SOS" – Standard Offer Service at the following rates:

	Summer	Winter
Generation Service Charge		
All kilowatt-hours – On-Peak	\$ 0.09950 per kwhr	\$ 0.11199 per kwhr
All kilowatt-hours – Off-Peak	\$ 0.03034 per kwhr	\$ 0.03601 per kwhr
All kilowatt-hours – Admin Charge	\$ 0.00300 per kwhr	\$ 0.00300 per kwhr

	Summer	Winter
Transmission Service Charge		
Minimum Charge*	\$ 0.12 per customer	\$ 0.12 per customer
In excess of 30 kilowatt-hours	\$ 0.00790 per kwhr	\$ 0.00790 per kwhr

*The minimum charge includes the first 30 kWh or fraction thereof of consumption.

Procurement Cost Adjustment

See <https://www.pepco.com/MyAccount/MyBillUsage/Pages/DC/CurrentTariffsDC.aspx> for the currently effective rate.

BILLING MONTHS

Summer – Billing months of June through October.

Winter – Billing months of November through May.

Date of Issue: MONTH DATE YEAR

Date Effective: Usage on and after
MONTH DATE YEAR

PEAK HOURS

For Schedule "R-PIV," On-Peak hours are considered to be 12:00 p.m. to 8:00 p.m., Monday through Friday, excluding holidays.

METER READING

Watt-hour meters will be read to the nearest multiple of the meter constant and bills rendered accordingly.

GENERAL TERMS AND CONDITIONS

This schedule is subject in all respects to the Company's "General Terms and Conditions for Furnishing Electric Service" and the Company's "Electric Service Rules and Regulations."

APPLICABLE RIDERS

Standard Offer Service – Residential – Plug-In Vehicle Charging
Administrative Credit
Delivery Tax
Public Space Occupancy Surcharge
Residential Aid Discount
Optional Meter Equipment Related Services
Net Energy Metering Rider
Residential Aid Discount Surcharge Rider
Sustainable Energy Trust Fund
Energy Assistance Trust Fund
Bill Stabilization Adjustment
Residential Direct Load Control Rider
Underground Project Charge Rider
Community Net Metering Rider
Customer Base Rate Credit Rider
Underground Rider
Excess Deferred Income Tax Credit
Rider PIV-Green

Attachment C

PLUG-IN VEHICLE – GREEN RIDER**RIDER “PIV-GREEN”****PLUG-IN VEHICLE – GREEN RIDER – “PIV-GREEN”**

This rider, which is only available to customers served under Schedule R-PIV provides 100% renewable energy on an opt-in basis to Schedule “R-PIV.”

This rider is a dollar per kilowatt-hour rate and is applied to the Customer’s billed kilowatt-hours. This rider will be updated based on the most up-to-date market prices and the District of Columbia Renewable Portfolio Standards on or about February 1st and August 1st of each year.

The current applicable Rider “PIV-Green” rate is equal to \$0.04717 per kilowatt-hour.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Transportation Electrification Implementation Plan of Order No. 19898 was served this October 31, 2019 on all parties in Formal Case No. 1130 and 1155 by electronic mail.

Ms. Brinda Westbrook-Sedgwick
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