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ELECTRONIC FILING

December 9, 2019

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

RE: Rulemaking (RM) 29

Dear Ms. Brinda Westbrook-Sedgwick,

Please find attached comments from 3Degrees Group Inc. ("3Degrees") in response to the Public Service Commission of the District of Columbia's Notice of Second Proposed Rulemaking regarding its intent to amend Chapter 29 (Renewable Energy Portfolio Standard) of Title 15 (Public Utilities and Cable Television) of the District of Columbia Municipal Regulation (DCMR).

Please call me if there are questions regarding this filing.

Respectfully submitted,

/s/ Maya Kelty

Maya Kelty

Director, Regulatory Affairs

3Degrees Group Inc.

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cc: Service List

Steven Mickelsen

General Counsel, 3Degrees Group Inc

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF)	
15 DCMR CHAPTER)	
29-RENEWABLE ENERGY)	RM29-2019-01-M-1
PORTFOLIO STANDARD-)	
CLEANENERGY DC OMNIBUS)	
AMENDMENT ACT OF 2018)	

COMMENTS OF 3DEGREES GROUP, INC
REGARDING NOTICE OF PROPOSED RULEMAKING RM29-2019-01-M-2019-1

Pursuant to the Notice of Proposed Rulemaking ("NOPR") published in the D.C. register on November 8, 2019 proposing revisions to Chapter 29 (Renewable Energy Portfolio Standard) ("RPS") of Title 15 (Public Utilities and Cable Television) of the District of Columbia, and the invitation therein for interested parties to file comments, 3Degrees Group Inc. ("3Degrees") hereby files these comments.

3Degrees is a leading provider of comprehensive clean energy and carbon services that enable organizations and individuals to transition towards a low-carbon economy. 3Degrees is one of the largest buyers and sellers of RECs in the country and serves hundreds of businesses, utilities, and other load serving entities.

Over the past decade, 3Degrees has worked closely with suppliers in the District of Columbia in order to support them in meeting the District's RPS goals. 3Degrees also works closely with purchasers and generators participating in the voluntary market. The voluntary market is made up of millions of individuals and businesses who seek to purchase renewable energy above and beyond state mandates.

3Degrees appreciates the opportunity to provide comments on the Public Service Commission's ("Commission's") intent to amend certain subsections of Chapter 29 of the RPS in accordance with the Clean Energy Act.

This NOPR clarifies the definition of PJM Interconnection region and Adjacent PJM State in 2999.1. The NOPR clarifies that, in states which are only partially coordinated by the PJM

interconnection, the portion of the state where wholesale electricity movement is **not** coordinated by the PJM Interconnection is considered to be an “Adjacent PJM State”. For a facility to be within the “PJM Interconnection region,” the facility must be located in the portion of the state where wholesale electricity movement is coordinated by the PJM Interconnection. This revision provides needed clarity to the various entities that support the District in meeting its RPS targets, ensures that the District is best positioned to meet the goals laid out in the Clean Energy DC Plan, and expresses the intent of the eligibility requirement revisions made by the DC Council in B22-0904. 3Degrees supports this regulatory revision in the NOPR.

3Degrees thanks the Commission and Staff for their work drafting the revisions of Chapter 29 of Title 15 of the DCMR, and for providing clear and concise revisions that are in line with B22-0904.

Respectfully submitted,
/s/ Maya Kelty
Maya Kelty
Director, Regulatory Affairs
3Degrees Group Inc.

cc: Steven Mickelsen
General Counsel, 3Degrees Group Inc.

Date: December 9, 2019

CERTIFICATE OF SERVICE

I hereby certify that on this 9th day of December 2019, I caused true and correct copies of the foregoing comments of 3Degrees Group Inc. to be emailed to the following:

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