



Sandra Mattavous-Frye, Esq.
People's Counsel

March 23, 2022

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

PUBLIC VERSION

Re: Formal Case No. _____, *In the Matter of the Complaint and Investigation into Potomac Electric Power Company's Community Renewable Energy Facility Practices*

Dear Ms. Westbrook-Sedgwick:

Attached for filing in the above-referenced proceeding, please find the public version of the *Office of the People's Counsel for the District of Columbia and District of Columbia Government's Joint Complaint and Petition for Investigation into Potomac Electric Power Company's Community Renewable Energy Facility Practices*. The confidential exhibits, which contain personally identifiable information and sensitive or proprietary business information, will be provided under separate cover.

If there are any questions regarding this matter, please contact me at tjohnson@opc-dc.gov or 202.727.3071.

Sincerely,

/s/ Thaddeus Johnson

Thaddeus Johnson
Assistant People's Counsel

Enclosure

cc: Parties of record

In the Matter of)
)
the Complaint and Investigation into)
Potomac Electric Power Company’s)
Community Renewable Energy Facility)
Practices)

**THE OFFICE OF THE PEOPLE’S COUNSEL FOR THE
DISTRICT OF COLUMBIA AND DISTRICT OF
COLUMBIA GOVERNMENT’S JOINT COMPLAINT AND
PETITION FOR INVESTIGATION INTO POTOMAC
ELECTRIC POWER COMPANY’S COMMUNITY
RENEWABLE ENERGY FACILITY PRACTICES**

March 23, 2022

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Exhibit F	Affidavit of Danielle Devery and accompanying exhibit
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Exhibit H	Affidavit of David Murray

GLOSSARY

allocation report or allocation file	Reports provided by Pepco to the Subscriber Organization by the 10 th business day of every month detailing both the recorded generation for CREF and the allocated CNM credits to subscribers of the CREF (or CREF aggregation).
Authorization to Operate (ATO)	Written notification that a Small Generator Facility is approved for operation under the terms and conditions of the District of Columbia Small Generator Interconnection Rules. <i>See</i> 15 DCMR § 4099.
Carry-Over Credit	Credits that are carried over when the value of the credits generated by the CREF allocated to the subscriber exceeds the amount owed by the subscriber as shown on the subscriber's bill at the end of the billing period. <i>See</i> D.C. Code § 34-1518(b)(5)(K).
Community Net Metering (CNM)	A billing arrangement under which the monetary value of electric energy generated by a CREF and delivered to Pepco's local distribution facilities is used to offset electric energy charges accrued during a subscriber's applicable billing period. <i>See</i> D.C. Code § 34-1501(9A); <i>accord</i> 15 DCMR § 999.
Community Net Metering Credit (CNM Credit)	The credit realized by the subscriber based on its ownership share in the CREF. The credit will be reflected on the subscriber's bills from Pepco. <i>See</i> 15 DCMR § 999.
CREA	Community Renewable Energy Act. <i>See</i> D.C. Law 20-47 amending D.C. Code § 34-1501.
Community Renewable Energy Facility (CREF)	<p>An energy facility using renewable resources defined as tier one renewable sources in D.C. Code § 34-1431(15) that is located within the District of Columbia and where the monetary value of electricity generated by the facility is credited to the subscribers of the facility. D.C. Code § 34-1501(9B).</p> <p><i>See also</i> 15 DCMR § 999 (An energy facility with a capacity no greater than five (5) megawatts that: (a) uses renewable resources defined as a Tier One Renewable Source in accordance with D.C. Code § 34-1431(15) as amended; (b) is located within the District of Columbia; (c) has at least two (2) Subscribers; and (d) has executed an Interconnection Agreement and a CREF Rider with Pepco.)</p>
CREF Credit Rate	<p>The credit rate applied to subscribers of community renewable energy facilities, which shall be equal to:</p> <p>(A) For residential customer subscribers, the full retail distribution rate, which includes generation, transmission, and distribution charges, for the standard offer service General Service Low Voltage Non-Demand Customer class or its</p>

	successor, as determined by the Commission, based upon D.C. Code § 34-1518; and
	(B) For commercial customer subscribers, the standard offer service rate for the General Service Low Voltage Non-Demand Customer class or its successor, as determined by the Commission, based upon D.C. Code § 34-1518.
	D.C. Code § 34-1501(12A); <i>accord</i> 15 DCMR § 999.
the Council	the District of Columbia Council
Customer-Generator	<p>A residential or commercial customer that owns and operates an electric generating facility that:</p> <ul style="list-style-type: none"> (A) Has a capacity of not more than 1000 kilowatts; (B) Uses renewable resources, cogeneration, fuel cells, or microturbines; (C) Is located on the customer’s premises; (D) Is interconnected with the electric company’s transmission and distribution facilities; and (E) Is intended primarily to offset all or part of the customer’s own electricity requirements. <p>D.C. Code § 34-1501(15); <i>accord</i> 15 DCMR 1999.</p>
D.C. Code	District of Columbia Code
DCG or the District	District of Columbia Government
DCSEU	DC Sustainable Energy Utility
DOEE	District of Columbia Department of Energy and Environment
Energy Burden	The percentage of household income spent on home energy bills. D.C. Code § 8-1774.16(g)(2).
GATS	PJM’s Generation Attribute Tracking System
GPC	Pepco’s Green Power Connection team
Joint Petitioners	The Office of the People’s Counsel for the District of Columbia and the District of Columbia Government, by and through the Office of the Attorney General.
LIHEAP	Low Income Home Energy Assistance Program
LMI	low-moderate income
Locational Marginal Price (LMP)	The marginal price for energy at the location where the energy is delivered or received and is based on forecasted system conditions

	and the latest approved real-time security constrained economic dispatch program solution. <i>See</i> PJM glossary.
low-income	A household income equal to, or less than, 80% of the area median income. D.C. Code § 8-1774.16(g)(3); <i>see also</i> D.C. Code § 8-1774.16(g)(1) (defining area median income).
Net Energy Billing	A billing and metering practice under which a customer-generator is billed on the basis of net energy over the billing period. 15 DCMR § 999.
Net Energy Metering (NEM)	<p>Measuring the difference between the electricity supplied to an eligible customer-generator from the electric grid and the electricity generated and fed back to the electric grid by the eligible customer-generator. 34 D.C. Code § 34-1501(21).</p> <p><i>See also</i> 15 DCMR § 999 (The difference between the kilowatt-hours consumed by a customer-generator and the kilowatt-hours generated by the customer-generator's facility over any time period determined as if measured by a single meter capable of registering the flow of electricity in two directions.)</p>
OAG	District of Columbia Office of the Attorney General f/k/a/ the Office of Corporation Counsel
OPC or Office	Office of the People's Counsel for the District of Columbia
Pepco or Company	Potomac Electric Power Company
PJM	PJM Interconnection, LLC
PSC or Commission	District of Columbia Public Service Commission
Renewable Energy Credit (REC)	<p>A credit representing one megawatt-hour of energy produced by:</p> <ul style="list-style-type: none"> (A) A tier one or tier two renewable source located within the PJM Interconnection region; or (B) Until January 1, 2029, a tier one or tier two renewable source located within a state that is adjacent to the PJM Interconnection region that was certified by the Commission as of March 22, 2019. <p>D.C. Code § 34-1431(10); <i>accord</i> 15 DCMR § 999. Under D.C. Code § 34-1431(15), tier one renewable resources include solar energy.</p>
Renewable Energy Portfolio Standard (RPS)	The percentage of electricity sales at retail in the District of Columbia that is to be derived from tier one renewable sources and tier two renewable sources in accordance with D.C. Code § 34-1432(c). D.C. Code § 34-1431(11).
SFA	Solar for All as established by D.C. Code § 8-1774.16.

SNAP	Supplemental Nutrition Assistance Program
solar carve-out	The percentage of the District of Columbia’s RPS that must be met from local solar generating facilities as established in D.C. Code § 34-1432(c).
Standard Offer Service (SOS)	That electric service mandated by D.C. Code § 34-1509. D.C. Code § 34-1501(26); <i>accord</i> 15 DCMR § 999.
SOS Administrator	The provider of Standard Offer Service mandated by D.C. Code § 34-1509. D.C. Code 34-1501(25A); <i>accord</i> 15 DCMR § 999. Currently, Pepco is the SOS Administrator.
subscribed energy	The portion of electricity generated by a CREF attributable to subscribers of the CREF. Pepco as the SOS Administrator must use subscribed energy to offset purchases from wholesale suppliers for standard offer service. <i>See</i> D.C. Code § 34-1518(b)(5)(F).
Subscriber or subscriber	A retail customer of the electric company who owns a subscription and who has identified an individual billing meter within the District of Columbia to which the subscription shall be attributed. 15 D.C. Code § 1501(27). <i>See also</i> 15 DCMR § 999 (A retail customer of a Competitive Electricity Supplier or a SOS customer who owns a Subscription in a CREF and who has identified an individual billing meter within the District of Columbia to which the Subscription shall be attributed.)
Subscriber Organization	Any for-profit or nonprofit entity permitted by District of Columbia law that owns or operates one or more CREFs for the benefit of the subscribers. <i>See</i> D.C. Code § 1501(27A); <i>accord</i> 15 DCMR § 999.
Subscription	A percentage interest in a CREF’s electrical production. <i>See</i> D.C. Code § 1501(27B); <i>accord</i> 15 DCMR § 999.
unsubscribed energy	Any energy produced by a CREF in excess of what is accounted for through CREF subscriptions. <i>See</i> D.C. Code § 34-1518.01(i).

I. INTRODUCTION

Pursuant to Sections 34-402, 34-804(d), and 34-1508(d) of the District of Columbia Code (“D.C. Code”)¹ and Rule 101.1 of the District of Columbia Public Service Commission’s (“PSC” or “Commission”) Rules of Practice and Procedure,² the Office of the People’s Counsel for the District of Columbia (“OPC” or “Office”),³ the statutory representative of District of Columbia ratepayers with respect to utility matters, and the District of Columbia Government (“DCG” or “the District”), through the Office of the Attorney General (“OAG”) (collectively “Joint Petitioners”), respectfully submit this complaint and petition for the Commission to commence a formal investigation into Potomac Electric Power Company’s (“Pepco” or “Company”) repeated violations of its legal requirements with respect to Community Renewable Energy Facilities (“CREFs”)⁴ in the District of Columbia and the impact of Pepco’s CREF practices on the District’s Solar for All (“SFA”) program.⁵

The District of Columbia is a national leader in developing laws and policies to address both the devastating impacts of climate change and pervasive issues of energy unaffordability and inequity. Specifically, the District of Columbia Council (“the Council”) has mandated a 100% Renewable Portfolio Standard (“RPS”) by 2032⁶ and the Mayor has announced the District of

¹ D.C. Code §§ 34-402, 34-804(d), and 34-1508(d).

² 15 DCMR § 101.1.

³ D.C. Code § 34-804.

⁴ D.C. Code § 34-1501 (9B): “Community renewable energy facility” or “CREF” means an energy facility using renewable resources defined as tier one renewable sources in § 34-1431(15) that is located within the District of Columbia and where the monetary value of electricity generated by the facility is credited to the subscribers of the facility.

⁵ In accordance with 15 DCMR § 101.6, the Commission should treat this complaint and petition as an “investigation” and not as a “rate case.”

⁶ D.C. Code § 34-1432 (c).

Columbia’s official policy is to become carbon neutral by 2050.⁷ Because the District of Columbia neither houses native baseload generation, nor has land for significant utility scale renewable energy developments, local distributed solar is a necessary and essential component to meeting the District’s climate and clean energy objectives. Indeed, the Council has acknowledged the importance of local distributed solar by mandating that by 2041 ten percent of the renewable energy portfolio must be met from solar facilities located within the District of Columbia.⁸

While the District’s climate directives are ambitious, many in the District of Columbia are not able to benefit from, or participate in meeting, these goals absent proactive action. A large percentage of the District of Columbia’s residents and small businesses do not own property that can support the installation of renewable generation, including solar generation. And the populations most impacted by climate change in the District of Columbia⁹ already face a heavy energy burden¹⁰ and lack the economic means to develop their own renewable generation facilities.

⁷ The Council is currently considering legislation that would convert the executive policy into a legislative mandate. See D.C. Comm. Transp. and Env’t, *Climate Commitment Act of 2021*, B24-0267, available at <https://lims.dccouncil.us/downloads/LIMS/47264/Introduction/B24-0267-Introduction.pdf> (“Proposed Climate Commitment Act.”)

⁸ D.C. Code §34-1432(c)(31). The percentage of the portfolio that must be met from locally generated solar in the RPS is commonly referred to as “the solar carve-out.”

⁹ See, e.g., U.S. Environmental Protection Agency, *Climate Change and Social Vulnerability in the United States: A Focus on Six Impacts*, EPA 430-R-21-003 (2021) (identifying four “socially vulnerable population” groups based on: (1) income; (2) educational attainment; (3) race and ethnicity; and (4) age).

¹⁰ D.C. Code § 8-1774.16(g)(2) defines “energy burden” as “the percentage of household income spent on home energy bills.” DOEE has a target of three percent of net total energy burden as the goal for households that participate in the LIHEAP program. Applied Public Policy Research Institute For Study And Evaluation, District Of Columbia LIHEAP Energy Burden Analysis, 4.4 (2020), available at: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/DC%20DOEE%202020%20LIHEAP%20Energy%20Affordability%20Study%20-%20Energy%20Burden%20Report%20-%20Final%20-%2009-28-20.pdf.

OPC’s recent Energy Affordability Study provides insights into matters affecting energy affordability, particularly for DC’s low- to moderate-income (LMI) households. The study revealed that the average Supplemental Nutrition Assistance Program (“SNAP”)-Eligible household has a severe energy burden (i.e., energy burden is greater than 10% of income), that the average non-SNAP Low Income Home Energy Assistance Program (“LIHEAP”) household has an unaffordable energy burden (i.e., energy burden is greater than 6% of income). Energy Affordability

To prevent these challenges from impeding the proliferation of local solar, the Council has passed environmental justice laws that promote equitable access to solar generation, including the laws at issue here—CREF and Solar for All. CREFs allow Pepco customers who cannot install their own rooftop solar panels—due to property or financial constraints—to subscribe to an off-site CREF and earn monthly Community Net Metering (“CNM”)¹¹ credits (“CNM Credits”) proportionate to their share of the CREF’s generating capacity. And the Solar for All program provides the District of Columbia’s most vulnerable residents—those with a total household income of 80% or less of Area Median Income¹²—with access to solar energy by supporting the development of both personal and community renewable energy facilities. CREFs and Solar for All have two benefits: (1) they promote the proliferation of renewable energy, thereby reducing greenhouse gas emissions; and, (2) they assist with reducing electric bills by allowing subscribers to earn credits from the production of solar energy that are used to offset their electric bills.¹³

Study Survey Of Programs – In-Depth Analysis, APPRISE Incorporated (2020), available at: <https://opc-dc.gov/images/DC-OPC-Energy-Affordability-Study-State-Energy-Assistance-Programs-FINAL-12-7-2020.pdf>.

Similarly, DOE’s recent utility burden study found that: “[t]he energy burden of low-income households is 4.5 times higher than that of non-low-income households”; “[t]he median energy burden for Black and Hispanic households is 45% higher than that of white (non-Hispanic) households”; “[a]cross the DC metro area, 64% of low-income households face a high energy burden (above 6%), and 40% of low-income households face a severe energy burden (above 10%)”; and, “[o]ne-fourth (25%) of low-income households experience an energy burden of at least 15%, which is 7.5 times the median for the DC metro area.” An Examination of District Residents’ Experiences with Utility Burdens and Affordability Programs, American Council for an Energy-Efficient Economy (2021), available at: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/Report_An%20Examination%20of%20District%20Residents%E2%80%99%20Experiences%20with%20Utility%20Burdens%20and%20Affordability%20Programs.pdf.

¹¹ D.C. Code § 34-1501 (9A): “Community net metering” means a billing arrangement under which the monetary value of electric energy generated by a community renewable energy facility and delivered to the electric company’s [Pepco’s] local distribution facilities is used to offset electric energy charges accrued during a subscriber’s applicable billing period.

¹² D.C. Code § 8-1774.16(g)(3); *see also* D.C. Code § 8-1774.16(g)(1) defining the term Area Median Income.

¹³ *See* D.C. Code 34-1501(12A) (stating that the CREF Credit Rate is “a credit rate applied to subscribers of community renewable energy facilities, which shall be equal to: (A) For residential customer subscribers, the full retail distribution rate, which includes generation, transmission, and distribution charges, for the standard offer service

As the monopoly owner and operator of the distribution grid and the sole provider of distribution services in the District of Columbia, Pepco plays an indispensable role in ensuring the successful operation of CREFs and Solar for All—a role governed by the District’s laws and the Commission’s regulations. But complaints from developers, consumers, and the District of Columbia Department of Energy and Environment (“DOEE”) staff illuminate that Pepco has repeatedly violated its legal requirements by:

- providing erroneous bills to CREF Subscribers¹⁴ and untimely and incorrect allocation reports to Subscriber Organizations;¹⁵
- installing its own meters on CREFs that report different output than the production grade meters that are used to calculate the Renewable Energy Credits (“RECs”) recorded in the Generation Attribute Tracking System (“GATS”) run by PJM Interconnection, LLC (“PJM”);
- failing to account for, and appropriately pay for, unsubscribed CREF energy;
- issuing bills to CREFs that appear to be net energy bills; and

General Service Low Voltage Non-Demand Customer class or its successor, as determined by the Commission, based upon § 34-1518; and (B) For commercial customer subscribers, the standard offer service rate for the General Service Low Voltage Non-Demand Customer class or its successor, as determined by the Commission, based upon § 34-1518;” *accord* 15 DCMR § 999. *See also* District of Columbia Electric Tariff, Community Net Metering Rider “CNM” Third Revised Page No. R-52.1, (“For residential customers, the CREF Credit Rate is the full retail rate, which includes generation, transmission and distribution charges, for the Standard Offer Service (SOS) General Service Low Voltage Non-Demand Customer class or its successor, as determined by the Commission based upon Section 118 of the [Community Renewable Energy Act].”), available at: <https://www.pepco.com/SiteCollectionDocuments/Pepco%20DC%20Third%20Biennial%20Plan%20Current%20Tariff%20-%20effective%202.26.22-%20clean.pdf>.

¹⁴ D.C. Code § § 34–1501 (27): “Subscriber” means a retail customer of the electric company [Pepco] who owns a subscription and who has identified an individual billing meter within the District of Columbia to which the subscription shall be attributed. *See* 15 DCMR § 999.

¹⁵ D.C. Code § § 34–1501 (27A): “A Subscriber organization” means any for-profit or nonprofit entity permitted by District of Columbia law that owns or operates one or more community renewable energy facilities for the benefit of the subscribers. *See* D.C. Code § 1501(27A); *accord* 15 DCMR § 999.

- taking other actions that are at cross-purposes with the District mandates for renewable energy and affordability.

These violations impact all groups who have an interest in the CREF model succeeding—from the developers who construct the CREFs, to the Subscriber Organizations who recruit consumers to join the CREFs and who are to receive payments for unsubscribed energy. Most importantly, Pepco’s conduct harms the CREF subscribers who have the dual expectation of reduced electric bills and that their actions will support the District’s climate goals. All CREF subscribers are negatively impacted when they do not receive their expected CNM Credits. However, Solar for All CREF subscribers bear the brunt of these negative impacts because they account for 72% of all CREF subscribers in the District of Columbia.¹⁶ Pepco’s actions have resulted in higher monthly household energy bills than subscribers should be paying, which is especially critical given the negative economic impacts of the COVID-19 pandemic.¹⁷ Timely and correctly calculated CNM Credits can help to ensure that District of Columbia residents’ electric accounts will not be subject to the threat of disconnection.

Pepco’s pattern of systemic violations is undercutting the benefits of CREFs to low-income residents and the legislative purposes of the Solar for All program. If unabated, these violations could seriously hamper the District’s ability to meet its goals to expand clean energy

¹⁶ Ex. A, Affidavit of Alexandra Fisher, ¶ 12 (“Fisher Aff.”).

¹⁷ While the Council mandated a moratorium on utility shutoffs during the COVID-19 pandemic, the utility bills continued to accrue during this time period. With the expiration of the moratorium, Pepco has resumed collections on the arrearages. *See also* District of Columbia Government, 2020 Comprehensive Annual Financial Report, at 5 (discussing COVID-19 impacts that resulted in historically high unemployment rates and slowed economic activities), available at: https://cfo.dc.gov/sites/default/files/dc/sites/ocfo/publication/attachments/FY%202020%20DC%20CAFR_Full%20Report.pdf (Jan 28, 2021).

use,¹⁸ foster consumer access to renewable energy generation, and reduce energy bills. Customers who fail to see the benefits in the CREFs and Solar for All program will not only discontinue their CREF or Solar for All Subscription, but will also likely discourage others from participating in the CREF market or the Solar for All program.

Joint Petitioners have attempted to work with the Company to resolve these persistent issues. Indeed, DCG has met with Pepco for almost two years, but the issues persist to this day. And prior to filing this complaint and petition OPC and DCG met with the Company to discuss the issues raised herein. The informal process has not worked.

Joint Petitioners respectfully request that the Commission use the full force of its regulatory authority to investigate and conduct a third-party audit of the Company's actions and compel Pepco to comply with the District's energy laws and regulations related to installing and reading CREF meters, payments for unsubscribed energy, CNM credits for subscribed energy, CNM billing, and bill error reporting. Joint Petitioners also request that the Commission assess sanctions for Pepco's repeated and systemic violations of the District's CREF-related energy laws and regulations. Joint Petitioners submit that a working group or technical conference would be insufficient to deal with the issues raised by this Complaint and Petition, and that a formal investigation is needed for all parties and the Commission to understand the depth, breadth, and impacts of the violations.

In support of their complaint and petition for a formal investigation and sanctions, Joint Petitioners state as follows:

¹⁸ The impacts extend further than those discussed herein as the law requires the payment of noncompliance penalties if annual RPS targets are not met, which fees may be passed onto ratepayers through generation costs. *See* D.C. Code §§ 34-1434(c) and 34-1435.

II. FACTUAL AND LEGAL BACKGROUND

A. *Joint Petitioners have authority to bring this complaint and petition for formal investigation.*

1. Petitioner OPC is an independent agency of the District of Columbia Government that is statutorily authorized to “represent and appeal for the people of the District of Columbia at hearings of the Commission [that] involve the interests of users of the products of or services furnished by public utilities under the jurisdiction of the Commission.” D.C. Code § 34-804(d)(1).

2. Among other things, OPC’s statutory responsibilities to its constituents “while advocating on matters pertaining to the operation of public utility or energy companies” include the obligation to “consider. . . the economy of the District of Columbia, . . . and the preservation of environmental quality, including effects on global climate change and the District’s public climate commitments.”¹⁹

3. Joint Petitioner DCG is a municipal corporation empowered to sue and be sued and is the local government for the territory constituting the permanent seat of the government of the United States. DCG is represented through its chief legal officer, the Attorney General for the District of Columbia. The Attorney General has general charge and conduct of all legal business of the District and all suits initiated by and against the District and is responsible for upholding the public interest.²⁰ The Attorney General is specifically authorized to enforce the District’s environmental laws.

4. Through DOEE, DCG is statutorily responsible for promoting “the general welfare of the public by assuring coordinated and efficient management of the District’s energy policy and

¹⁹ D.C. Code § 34-804(e).

²⁰ D.C. Code § 1-301.81(a)(1).

programs,” including “the development of a comprehensive energy plan, policy, and programs for the District of Columbia.”²¹

5. DCG has further been directed “[t]o utilize public funds as a means of ensuring equity in the way energy costs are allocated, including, but not limited to, programs which will aid low- and moderate-income citizens in . . . gaining access to renewable sources of energy and in meeting the costs of high utility bills.”²²

6. DCG, through DOEE, administers the SFA program.²³

7. D.C. Code § 34–1508(d) specifically authorizes DCG and OPC to initiate a proceeding before the Commission to investigate whether Pepco is in violation of the provisions of Title 35, Chapter 15 and to seek appropriate penalties for such violations. The statutory requirements for CREFs are found under Chapter 15.

B. The Commission has independent authority to investigate Pepco’s practices, mandate legal compliance, and assess penalties.

8. The Commission serves a vital role in addressing climate change and energy affordability. Indeed, in carrying out its regulatory functions, the Commission is statutorily mandated to consider “the conservation of natural resources, and the preservation of environmental quality, including effects on global climate change and the District’s public climate commitments.”²⁴

9. In pertinent part, D.C. Code § 34-301(1) provides the Commission with “general supervision” over the District of Columbia’s electric distribution utility.

²¹ D.C. Code §§ 8-171.01(a)(4, 6), (b)(2).

²² D.C. Code § 8-171.03(13).

²³ DOEE administers the SFA program in coordination with the D.C. Sustainable Energy Utility (“D.C. SEU”). See D.C. Code § 8-1774.16(b).

²⁴ D.C. Law 22-257, Section 103 amending D.C. Code § 34-808.02.

10. Pursuant to D.C. Code § 34-908, the Commission has the authority, upon a reasonable complaint made against any public utility, to investigate that public utility if its service or time and conditions of payment are in any respect unreasonable, insufficient, or unjustly discriminatory or if any service is inadequate or unobtainable.

11. Indeed, the Commission has a statutory obligation to investigate and enforce all laws relating to public utilities.²⁵ The Commission has exercised this authority in other matters affecting the rights of the District of Columbia's public utility consumers and ratepayers.²⁶

12. Pursuant to D.C. Code § 34-706(a), "if any public utility shall violate any provision of this subtitle, or shall do any act herein prohibited, or shall fail or refuse to perform any duty enjoined upon it for which a penalty has not been provided, or shall fail, neglect, or refuse to obey any lawful requirement . . .", the Commission has the authority to levy fines of up to \$5,000 for each offense.

13. Like OPC and DCG, D.C. Code § 34-1508(d) also vests the Commission with authority to initiate a proceeding to investigate violations by Pepco of Title 34, Chapter 15 and to assess penalties as appropriate.

14. Under D.C. Code §§ 34-1508(a) and (b)(1), if the Commission finds a violation of any provision Title 34, Chapter 15, or a violation of any regulation or order issued under this chapter, the Commission may, among other things:

²⁵ D.C. Code § 34-402.

²⁶ See *Formal Case No. 1090, In the Matter of the Investigation into the Reliability of Verizon Washington, D.C.'s Telecommunications Infrastructure*; *Formal Case No. 1126, In the Matter of OPC's Complaints Against Washington Gas Light Company Regarding Its Unlawful Compensation of Competitive Service Providers in Violation of Its Rate Schedule No. 5*; *Formal Case No. 1164, In the Matter of an Inquiry into the Impacts of the COVID-19 Pandemic on District Utilities and Consumers*.

- impose a civil penalty on a market participant or the electric company of up to \$10,000 per violation;
- order a refund or credit to a customer; or
- issue a cease and desist order to . . . the electric company.

C. The District has adopted aggressive policies to combat the devastating impacts of climate change.

15. Congruent with scientific findings and government action on the international stage,²⁷ members of both the executive and legislative branches of the District Government have expressed grave concern about the deleterious impacts of climate change, including hotter summers, increased flooding, and more severe storms.²⁸

16. Consequently, the District has taken several steps to decarbonize and transition to clean energy, including:

- Adopting a 100% Renewable Portfolio Standard by 2032, and a solar carve-out that requires 10% of the standard be met by local solar by 2041.²⁹

²⁷ IPCC, 2019: Climate Change and Land: an IPCC special report on climate change, desertification, land degradation, sustainable land management, food security, and greenhouse gas fluxes in terrestrial ecosystems; Paris Agreement to the United Nations Framework Convention on Climate Change, Dec. 12, 2015, T.I.A.S. No. 16-1104.

²⁸ See, e.g., *ClimateReady DC, The District of Columbia's Plan to Adapt to a Changing Climate*, available at https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/CRDC-Report-FINAL-Web.pdf (“Cities across the country and around the globe are recognizing their responsibility to prepare for a changing climate, and the District is no exception. In recent years, we have seen how climate change is already impacting us with record-breaking heat waves and snowstorms, flooding caused by rising sea levels and heavy rains, and the destructive 2012 derecho storm. These events are sobering reminders that without action, increasingly severe weather events will threaten to disrupt our power grid, harm our economy, and cost lives.”); see also Proposed Climate Commitment Act, Letter from Councilmember Cheh (“The District is already experiencing the impacts of human-caused climate change, including record-breaking extreme weather, higher tides caused by rising sea levels, heavy rains and flooding, warmer average temperatures, and a sharp increase in the number of dangerously hot days. As these impacts increase in frequency and severity, they will negatively affect the health, safety, and quality of life of all District residents. And they will not affect everyone equally; instead, they will be felt most immediately and most intensely by communities of color.”)

²⁹ D.C. Code §34-1432(c)(22), (31).

- Advancing policy commitments that include reducing carbon emissions by 50% by 2032 and achieving carbon neutrality by 2050.³⁰

D. The District is committed to ensuring equitable access to solar generation.

17. The mandate to transition to a clean energy economy with access to local solar faces several obstacles, including, but not limited to:

- Not all housing and commercial building stock in the District of Columbia can technically support solar (weak roofs, inadequate space, incorrect orientation to capture the solar energy, etc.).
- Over fifty-eight percent of total residents in the District of Columbia rent their housing.³¹ Among low- or moderate-income households,³² the proportion of renters is even higher. Renters do not have the right or ability to install solar on their residence.

18. The District has adopted the use of CREFs and established the Solar for All program to speed the transition to a clean energy economy and to ensure equitable access to solar energy.

1. Community Renewable Energy Facilities

19. To overcome the obstacles identified above and ensure equitable access to solar technology for low- and moderate- income earners, in 2013 the District passed the Community

³⁰ Press Release, DC DOEE, Mayor Bowser Commits to Make Washington, D.C. Carbon- Neutral and Climate Resilient by 2050, (Dec. 4, 2017), <https://mayor.dc.gov/release/mayor-bowser-commits-make-washington-dc-carbon-neutral-and-climate-resilient-2050>.

³¹ U.S. Census Bureau, 2021 Quick Facts, <https://www.census.gov/quickfacts/D.C> (last visited Feb. 11, 2022).

³² Fisher Aff. ¶ 14.

Renewable Energy Act of 2013 (“CREA,” D.C. Law 20-47),³³ amending the Retail Electric Competition and Consumer Protection Act of 1999.³⁴ Among other things, CREA created and implemented the framework for CREFs. The legislation was designed to invigorate the local clean energy economy, provide equitable access to clean energy, and combat the costs and impacts of climate change.

20. Under D.C. Code § 34-1501(9B), to qualify as a CREF the generating facility must:

- be located in the District of Columbia,
- generate electricity using renewable sources (such as solar arrays), and
- allow the monetary value of electricity generated by the facility to be credited to the subscribers of the facility.³⁵

21. CREFs offer subscriptions that off-set up to 120 percent of energy consumption over a 12-month period.³⁶ Residents who subscribe to a CREF (or are awarded a share through the SFA program) are entitled to receive CNM Credits on their electric bill. CNM Credits are calculated by multiplying the subscriber’s share by the total kilowatt hours (kWh) of generation and again by the CREF Credit Rate.³⁷

22. CREFs help the District meet its clean energy and equity goals by encouraging and broadening access to renewable energy generation and by supporting affordability.

23. In authorizing the development and operation of CREFs, the Council laid out clear guidelines for Pepco to follow, including that Pepco must:

³³ D.C. Law 20-47 amending D.C. Code § 34-1501 *et seq.*

³⁴ D.C. Law 13-107 amending D.C. Code § 34-1501 *et seq.*

³⁵ D.C. Code § 34-1501 (9B).

³⁶ D.C. Code § 34-1518.01(b)-(c).

³⁷ D.C. Code § 34-1518(b)(5)(J).

- read the production meter owned by the CREF;³⁸
- credit CREF subscribers in an amount relative to the size of their capacity investment (Subscription) in the CREF, which is to appear on a subscriber's electricity bills to offset kWh charges accrued by the subscriber during that billing period;³⁹
- own all electricity exported to the grid by the CREF;⁴⁰
- use subscribed energy to offset purchases from wholesale suppliers for standard offer service;⁴¹ and
- purchase from Subscriber Organizations the energy associated with the unsubscribed CREF capacity at the PJM Locational Marginal Price for the PEPCO zone, adjusted for ancillary service charge.⁴²

24. CREFs are critical for the District to meet its clean energy goals and RPS standards, especially the RPS' local solar carve out.

2. **Solar for All Program**

25. Since the passage of CREA in 2013, the District has continued to demonstrate a commitment to reducing emissions and helping residents and business owners access clean and renewable energy resources. The Renewable Portfolio Standard Expansion Amendment Act of

³⁸ D.C. Code § 34-1518(b)(5)(H).

³⁹ D.C. Code §§ 34-1518.01(c); 34-1501(9A).

⁴⁰ D.C. Code § 34-1518(b)(5)(F).

⁴¹ *Id.*

⁴² D.C. Code § 34-1518.01(i).

2016 created special funding for the Renewable Energy Development Fund (“REDF”), which is used by DOEE in part to support the District’s SFA program.⁴³

26. DOEE administers the SFA program, which has a goal of providing, by December 31, 2032, the long-term financial benefits of solar energy to at least 100,000 low-income households, in an amount equivalent to at least 50% of the average residential electricity bill in the District of Columbia, for calendar year 2016.⁴⁴

27. The SFA program works by financing and developing both individual residential and community solar projects to benefit renters and residents in multi-family buildings.⁴⁵

28. SFA is administered by DOEE in coordination with the DC Sustainable Energy Utility (“DCSEU”),⁴⁶ which contracts with third parties to build CREFs. DOEE acts as a Subscriber Organization for CREFs in the SFA program, managing Subscriptions to the CREFs built pursuant to DCSEU-third party contracts.⁴⁷

29. SFA is essential for the District to meet its goal of providing all District of Columbia residents access to clean energy. SFA-funded CREFs also help the District to meet its aggressive solar carve-out requirements in the RPS.

⁴³ D.C. Code § 8-1774.16(c).

⁴⁴ D.C. Code § 8-1774.16(a)(2).

⁴⁵ *Solar for All*, DEP’T OF ENERGY & ENV’T, <https://doee.dc.gov/solarforall> (last visited Feb. 16, 2022).

⁴⁶ D.C. Code § 8-1774.16(b).

⁴⁷ Fisher Aff. ¶ 12.

E. Joint Petitioners have received numerous complaints that, when taken as a whole, suggest that Pepco’s CREF practices are undermining public confidence in CREFs.

30. Joint Petitioners have received numerous complaints from residents, Subscriber Organizations, and developers alleging that the CREF solar marketplace is not operating as intended, which is undermining their confidence in CREFs.

31. For example,

- a. CREF customer, Matthew Fallon, reports that “Multiple times my solar credits were not applied to my Pepco bill for several months in a row.”⁴⁸ Mr. Fallon further states that “the concept of utility bill savings is appealing, as is the option to participate in solar as a renter or without having to make a long-term rooftop commitment. However, the program is not in a place I would be comfortable recommending it to others.”⁴⁹
- b. CREF customer, Danielle Devery reports that her “community net metering credits were omitted from my June 2020 and July 2020 Pepco billing statements.”⁵⁰ And that although she received “an email notification on 9/3/20 [sic] with a link to a corrected bill with a credit of \$73.81. . .Pepco has so many reporting delays in sending over its Community Net Metering Credit reports in a timely fashion that it’s hard to keep track of the solar production periods [she is] being billed for.”⁵¹

⁴⁸ Ex. E, Affidavit of Matthew Fallon, ¶ 7 (“Fallon Aff.”).

⁴⁹ *Id.*, ¶ 9.

⁵⁰ Ex. F, Affidavit of Danielle Devery ¶ 16 (“Devery Aff.”).

⁵¹ *Id.* ¶¶ 17.

- c. In addition to being a CREF subscriber, Ms. Devery was employed from March 2018 to April 2021 as the retention marketing manager for CleanChoice Energy’s community solar product. Ms. Devery explains that the billing issues were “confusing for [her], as someone who is more informed about the product so [she] cannot imagine the frustration that general customers have.” And that Pepco’s repeated issuance of incorrect bills with misapplied credit amounts create “a poor customer experience that makes it harder for community solar management companies to retain customers who are unsure of how the program works.”⁵²
- d. CREF customer, David Murray reports that Pepco’s “current credit allocation system is very confusing” and it is not clear on his bills as to whether he owes Pepco money or has a credit.⁵³
- e. CREF customer, Thomas Crowder reported that:
- Pepco used confusing language to identify the credit. “Not even someone in the industry would know what the credit line acronym stands for as labeled ‘CNM Credit: PD NCS 11’;”⁵⁴
 - Pepco “missed credits and didn’t communicate that;”⁵⁵

⁵² *Id.* ¶ 6.

⁵³ Ex. H, Affidavit of David Murray, ¶¶ 6-7 (“Murray Aff.”) (It “makes me question how much I’m saving with community solar. Am I going to owe money to Pepco later? I don’t know.”)

⁵⁴ Ex. G, Affidavit of Thomas Crowder, ¶ 10. (“Crowder Aff.”).

⁵⁵ *Id.*, ¶ 16.

- Pepco has “reps [who] are unfamiliar with the product and can’t help customers;”⁵⁶ and
- Pepco sent him “bills [that] are confusing and carry shocking balances due for years that are offset by credits buried elsewhere in the bill.”⁵⁷

32. Affiant Armando Gaetaniello, the Vice President of Business Development for Neighborhood Sun Benefit Corp (“NS”), a CREF Subscriber Organization, further reports that Pepco improperly accounts for carry over credits and does not provide allocation reports in a timely manner. Affiant Gaetaniello states that “[t]he issues that NS has experienced with this program has impacted NS in a way that we prefer to not participate in projects that are too small (below 500 kW_{DC}) from now on.”⁵⁸

III. PEPSCO’S LEGAL VIOLATIONS

COUNT 1: PEPSCO HAS VIOLATED THE D.C. CODE BY INSTALLING PEPSCO’S OWN PRODUCTION METERS ON CREFS.

33. D.C. Code § 34-1518(b)(5)(H) states that “[t]he amount of electricity generated each month available for allocation as subscribed or unsubscribed energy shall be determined by a revenue quality production meter installed and paid for by the owner of the community renewable energy facility.”⁵⁹

34. The D.C. Code further states that “[t]he determination of the monetary value of credits allocated to each subscriber to a particular community renewable energy facility” is “based

⁵⁶ *Id.*, ¶ 10.

⁵⁷ *Id.*

⁵⁸ Ex. B, Affidavit of Armando Gaetaniello, ¶ 10 (“Gaetaniello Aff.”).

⁵⁹ D.C. Code §34-1518(b)(5)(H). The energy production meter is also used to record generation output in PJM’s GATS system, which is used to allocate renewable energy credits to each facility.

on each subscriber's percentage interest of the total production of the community renewable energy facility.”⁶⁰

35. The Commission's regulations similarly state that “[t]he amount of electricity generated by a CREF each month and available for purchase as subscribed or unsubscribed energy shall be determined by a revenue quality interval meter (production meter) installed and paid for by the Subscriber Organization. . . .”⁶¹

36. The information captured by the generation production meter at each individual CREF project is supposed to be used to determine the credit that each subscriber will receive and the amount of a renewable energy credit that the CREF will earn.

37. Pepco has been installing proprietary Pepco metering equipment in addition to the revenue grade production meter on CREFs.

38. Pepco has not been granting CREFs an Authorization to Operate (“ATO”) until Pepco has installed its own meter.⁶²

39. Neither D.C. Code nor the Commission's regulations authorize Pepco to install and use its own meters as the source for determining the level of electricity generation for each CREF.⁶³

40. Rather, D.C. Code states specifically that “[i]t shall be the electric company's responsibility to read the production meter.”⁶⁴ The delineation of Pepco's responsibility appears

⁶⁰ D.C. Code § 34-1518(b)(5)(I).

⁶¹ 15 DCMR § 907.4.

⁶² Ex. D, Affidavit of Erin Larsen, ¶ 13 (“Larsen Aff.”).

⁶³ D.C. Code § 34-1518(b)(5)(I). *See also* D.C. Code § 34-1518(b)(5)(J) (“Each billing month, the value of the credits allocated to each subscriber shall be calculated by multiplying the quantity of kilowatt hours allocated to each subscriber by the subscriber's CREF credit rate.”).

⁶⁴ D.C. Code § 34-1518(b)(5)(H).

right after the phrase “the amount of electricity generated each month available for allocation as subscribed or unsubscribed energy shall be *determined by a revenue quality production meter installed and paid for by the owner of the community renewable energy facility.*”⁶⁵ Even were Pepco not expressly prohibited from installing its own meter at the CREF, the plain language of the statute requires Pepco to read the production meter installed by the CREF owner as the source for making the credit determination.⁶⁶

41. Similarly, the Commission’s regulations state that “[a]fter installation of the interval meter [that is installed and paid for by the Subscriber Organization], it shall be the Electric Company’s responsibility to determine that the revenue quality interval meter has been properly installed, in accordance with industry standards. It shall also be the responsibility of the Electric Company to read the revenue quality interval meter.”⁶⁷

42. Affiant Fisher, a policy analyst with DOEE who has been investigating issues related to generation allocation and billing for the Solar for All program, states that all 166 CREFS in the SFA program have received Pepco meter numbers and Pepco has been using its proprietary installed meters for billing purposes.⁶⁸

43. Affiant Larsen similarly states that “Pepco has installed its proprietary meters at all of [New Columbia Solar’s] market rate and Solar for All CREFs.”⁶⁹

⁶⁵ *Id.* (emphasis added).

⁶⁶ See *In re D.H.*, 666 A.2d 462, 469 (D.C.1995) (stating “we first look to the plain meaning of its language, and if it is clear and unambiguous and will not produce an absurd result, we will look no further.”).

⁶⁷ 15 DCMR § 907.4.

⁶⁸ Fisher Aff. ¶¶ 13, 23.

⁶⁹ Larsen Aff. ¶ 13.

44. Affiant Larsen further explains that there was “no additional charge for the meter, though there is an application fee of \$500 per project and a fee for interconnection and distribution system upgrades for CREFs.”⁷⁰

45. Joint Petitioners do not have enough information to determine whether Pepco is deducting the costs of the meter from the application fee, but if so, the Company should not be allowed to recoup the costs for its unauthorized meters in the application fee. Nor should the Company be allowed to pass on the costs of the unauthorized meters in rates generally.

46. Pepco’s installation and use of its proprietary meters have harmed developers, Subscriber Organizations, customer subscribers, and the SFA program, by injecting unnecessary complexity into the interconnection process that could be contributing to delays, erroneous meter readings, and errors in accounting of CREF generation.⁷¹

47. *Interconnection Delays:* Affiants Larsen⁷² and Fisher⁷³ explain that the Pepco meters add another step to the interconnection process which leads to delays.⁷⁴

48. *Errors in Meter Readings:* Affiant Larsen reports Pepco uses erroneous readings from its own meters rather than using readings from the developer installed revenue grade meters.⁷⁵ Pepco’s meters often undercount generation because Pepco’s meters do not start recording generation immediately upon issuance of an ATO. Instead, as Affiant Fisher reports,

⁷⁰ *Id.*, ¶ 13.

⁷¹ Fisher Aff. ¶¶ 24, 19, 21, respectively.

⁷² Larsen Aff. ¶ 11.

⁷³ Fisher Aff. ¶ 24.

⁷⁴ Pepco’s CREF interconnection delays are well established. According to Pepco’s most recently filed quarterly interconnection report in Formal Case No. 1050, “[w]e reviewed 27 CREF applications and 9 of the applications that failed to meet approval deadlines were Community Renewable Energy Facility (CREF) applications.” (Jan. 28, 2022).

⁷⁵ Larsen Aff. ¶¶ 15-16.

recording often does not start until the second month after the CREF becomes operational.⁷⁶ As such, the first month or more of power is not appropriately credited to customers and subscribers.⁷⁷

49. *Errors in Accounting of CREF Generation:* Following complaints from subscribers, DOEE compared the allocation reports that Pepco provided against SFA’s generation data.⁷⁸

50. Based on this comparison, Affiant Fisher reports that “generation data recorded by the DCSEU indicates that Pepco is using its own proprietary meters to record generation” and that “Pepco’s meters may be undercounting generation attributable to CREFs with regularity.”⁷⁹

51. Pepco has violated D.C. Code § 34-1518(b)(5)(H) and 15 DCMR § 907.4 by installing its own proprietary meters on CREFs to determine how much electricity is generated each month. Pepco’s installation of its own meters has led to interconnection delays and meter errors, which undermine the operation of, and public confidence in, CREFs and the SFA program. The Commission should order Pepco to remove their proprietary meters from all CREFs.⁸⁰

**COUNT 2: PEPKO HAS VIOLATED THE D.C. CODE BY FAILING TO
ACCOUNT FOR AND REMIT UNSUBSCRIBED ENERGY PRODUCED
BY CREFS.**

52. If a CREF project does not sell all shares in the facility, the remaining shares are “unsubscribed energy” and are the property right of the Subscriber Organization.

⁷⁶ Fisher Aff. ¶¶ 18, 21.

⁷⁷ *Id.*

⁷⁸ *Id.*, ¶ 18.

⁷⁹ *Id.*; *See also* Larsen Aff. ¶ 27 (Noting that based on conversations with Pepco, CREF operational and billing issues are likely to persist until at least some time in 2023 or 2024, when Pepco represents that it will roll out its “enhancement plan.”)

⁸⁰ In addition, if Pepco is not ordered to remove its meters from CREFs, the meters will needlessly consume electricity, which is wasteful, and could potentially cause a CREF to malfunction if there is a problem with the meter.

53. The Commission’s regulations require that, “[i]f the electrical production of a CREF is not fully subscribed,” Pepco, in its role as the Standard Offer Service (SOS) Administrator, is obligated to purchase each CREF facility’s unsubscribed energy and to remit monthly payment to the CREF Subscriber Organization.⁸¹ “Any CREF production allocable to a Subscriber in excess of the Subscriber’s maximum allowable consumption offset shall be deemed unsubscribed energy and be made available for purchase by the SOS Administrator.”⁸²

54. The applicable rule states that unsubscribed energy shall be purchased “at the PJM Locational Marginal Price (‘LMP’) for energy in the Pepco District of Columbia sub-zone.”⁸³

55. The LMP “represents the cost to buy and sell power at different locations within wholesale electricity markets.”⁸⁴ PJM operates the wholesale electricity market within which Pepco operates.⁸⁵

56. Payment for the unsubscribed energy can help offset operational expenses and upfront costs of developing additional projects and managing costs of operating projects. Predictable and accurate payments of unsubscribed energy help maintain a healthy CREF market and maximizes the use of local clean energy to reduce greenhouse gas emissions from SOS supply. However, Affiants Fisher and St. Louis report that Subscriber Organizations have not been

⁸¹ 15 DCMR §§ 906.4 and 907.9.

⁸² 15 DCMR § 907.10. Pepco is currently the SOS Administrator in the District of Columbia.

⁸³ 15 D.C.M.R. § 906.4.

⁸⁴ *What is Locational Marginal Pricing?*, ENERGYACUITY, <https://www.energyacuity.com/blog/what-is-locational-marginal-pricing-lmp/> (last visited Feb. 18, 2022).

⁸⁵ PJM maintains a publicly available webpage that shows the LMP for each transmission zone in the PJM region at <https://www.pjm.com/library/maps/lmp-map.aspx>.

receiving these payments on a monthly basis—either due to delays in payments or missing payments.⁸⁶

57. As detailed in Fisher’s affidavit, “DOEE is unable to calculate the amount in payments that are missing due to uncertainties in accounting by Pepco (i.e., some of what is recorded as ‘unsubscribed energy’ should potentially have been credited to SFA subscribers).”⁸⁷ When DOEE “pressed about failures to compensate for unsubscribed energy in the past, Pepco has told DOEE that compensation has not yet been calculated.”⁸⁸

58. Even when checks are provided, Pepco’s communication lacks transparency with respect to how the amounts were calculated and whether the generation is being matched to the PJM LMP as required by 15 DCMR § 906.4. The price paid by Pepco as the SOS Administrator for unsubscribed energy is to match the hourly PJM LMP as adjusted for ancillary service charges.⁸⁹

59. Affiant Fisher explains that “DOEE received a few unexplained paper checks in mid-January of 2022 from Pepco. An example of such a check is included as Attachment A-4. Pepco has not yet confirmed whether these checks are for unsubscribed energy.”⁹⁰ However, even if Pepco can confirm that these checks are for unsubscribed energy, Pepco still has not provided

⁸⁶ Fisher Aff. ¶18 (stating that “of the approximately 1000 CREF bills DOEE has received, DOEE has not been receiving payments for unsubscribed energy as a Subscriber Organization on a monthly basis”); Ex. C, Affidavit of Paul St. Louis, ¶ 27 (“St. Louis Aff.”) (referencing Attachment C-3, a copy of communication from Pepco apologizing for delay in providing unsubscribed energy).

⁸⁷ Fisher Aff. ¶ 30.

⁸⁸ *Id.* ¶ 31.

⁸⁹ District of Columbia Electric Tariff, Community Net Metering Rider “CNM” Third Revised Page No. R-17.1 (“The SOS Administrator shall purchase any Unsubscribed Energy produced by the CREF at the hourly PJM Pepco DC fixed nodal weighted aggregate locational marginal price for energy adjusted as necessary to include ancillary service charges”) available at: <https://www.pepco.com/SiteCollectionDocuments/Pepco%20DC%20Third%20Biennial%20Plan%20Current%20Tariff%20-%20effective%202.26.22-%20clean.pdf>.

⁹⁰ Fisher Aff. ¶ 34.

DOEE with an accounting of how much more it owes DOEE for unsubscribed energy, or whether Pepco properly calculates the amount owed by matching generation to the PJM Locational Marginal Price as required by 15 D.C.M.R. § 906.4.⁹¹

60. Affiant Larsen similarly explains that New Columbia Solar received two checks from Pepco without explanation. Only after New Columbia Solar contacted Pepco to ask what the checks were for and to receive a breakdown for how they were calculated, did Pepco explain that these checks were for unsubscribed energy.⁹²

61. Pepco has violated 15 D.C.M.R. §§ 906.4 and 907.9 by not properly making monthly payments to Subscriber Organizations for the unsubscribed energy produced by CREFs.

**COUNT 3: PEPCO IS VIOLATING DISTRICT LAW BY FAILING TO
TIMELY AND ACCURATELY PROVIDE CREF SUBSCRIBERS WITH
CNM CREDITS.**

62. The D.C. Code makes clear that “[t]he determination of the monetary value of credits allocated to each subscriber to a particular community renewable energy facility shall be based on each subscriber’s percentage interest of the total production of the community renewable energy facility” and that “[e]ach billing month, the value of the credits allocated to each subscriber shall be calculated by multiplying the quantity of kilowatt hours allocated to each subscriber by the subscriber’s CREF credit rate.”⁹³

63. The Commission’s regulations further prescribe Pepco’s CREF billing responsibilities by stating that “[t]he determination of the monetary value of credits allocated to

⁹¹ *Id.* ¶ 35.

⁹² Larsen Aff. ¶ 19.

⁹³ D.C. Code §§ 34-1518(b)(5)(I)-(J).

each Subscriber of a particular CREF shall be based on each Subscriber's percentage interest of the total production of the CREF" and that "[e]ach billing period, the Electric Company shall calculate the value of the CNM Credit for subscribed energy allocated to each Subscriber by multiplying the quantity of kilowatt hours allocated to each Subscriber by the CREF Credit Rate."⁹⁴

64. Pepco is required to note the "CNM credit, as well as the kWh and price upon which it is based, [as] . . . line items on a Subscriber's Electric Company bill."⁹⁵

65. Pepco is required to allocate generation to bills in the same month that the energy was generated according to § 34-1501(9A): "'Community net metering' means a billing arrangement under which the monetary value of electric energy generated by a community renewable energy facility and delivered to the electric company's local distribution facilities is used to offset electric energy charges accrued during a subscriber's applicable billing period."

66. But Pepco has not been providing accurate and timely CNM Credits to customers.

67. As described in Fisher's affidavit, DOEE has received complaints from SFA customers about receiving lower than expected or zero benefits.⁹⁶ Allocation of zero benefits is impossible, unless a CREF was damaged or offline for an entire month. But DOEE has access to generation data from SFA CREFs and would be aware if a CREF were offline for an entire month.

68. Fisher's Affidavit provides the following table based on DOEE's comparison of data from Pepco-installed CREF meters to generation data recorded by the CREFs' inverters provided to DOEE by the DCSEU. The table indicates the number of CREFs that have missing

⁹⁴ 15 DCMR §§ 907.5-907.6.

⁹⁵ *Id.* § 907.8.

⁹⁶ Fisher Aff. ¶ 17.

or zero recorded generation in Pepco's allocation reports for the time-period of January 2020 through September 2021.⁹⁷

Month/Year	CREFs with Missing or Zero Generation	Estimated Generation Missing from Allocation Reports (kWh)
January 2020	9	5,274
February 2020	19	19,647
March 2020	33	59,370
April 2020	12	47,653
May 2020	n/a*	n/a
June 2020	n/a*	n/a
July 2020	13	89,622
August 2020	19	210,270
September 2020	82	645,703
October 2020	83	546,717
November 2020	30	65,312
December 2020	10	77,490
January 2021	3	44,949
February 2021	8	34,493
March 2021	5	115,741
April 2021	3	38,688
May 2021	9	57,477
June 2021	7	99,427
July 2021	0	0
August 2021	110	1,022,103
September 2021	0	0

69. Affiant Fisher explains that “the above data does not include estimated losses in situations when some amount of generation was recorded but was undercounted. Undercounted generation is difficult to summarize because DOEE’s review found that DOEE’s recorded

⁹⁷ Fisher Aff. ¶ 19. The DOEE audit was undertaken in September/October 2021 for the time period of January 2020 through September 2021. DOEE has not yet compiled this data from beyond Sept. 2021, but the issue continues to persist. For those Months with a * designation, the Pepco allocation reports were provided in aggregate. As such, it was not possible for DOEE to breakdown the information by individual CREF projects.

generation did not match Pepco's recorded generation except in only a few instances, with Pepco's recorded generation typically lower than DOEE's."⁹⁸

70. Affiant Fisher further states "[b]etween the missing and undercounted generation in the allocation reports, when compared to DOEE's recorded generation, DOEE estimates that SFA generation may have been undercounted by approximately 5,000 MWh as of September 2021, at least in the allocation reporting. It is unclear the extent to which this has resulted in undercrediting of CNM Credits to SFA subscribers."⁹⁹

71. Additionally, there is an unexplained two-month delay between the time where an SFA CREF receives ATO and when subscribers begin receiving benefits. As of a meeting between DOEE and Pepco on February 3, 2022, Pepco was unable to articulate the reason for the two-month discrepancy between the date an ATO was issued and when subscribers begin receiving benefits.

72. Part of this two-month delay at start-up is likely because Pepco continues to credit SFA subscribers on a (at least) one-month delay—i.e., generation from June 2021 would not show up until the July 2021 billing period. An example of an allocation report with generation and billing dates is included as Attachment A-7.

73. Affiant Fisher explains that DOEE has also received complaints from Pepco customers about "being re-billed in a manner that causes confusion or concern that subscribers are no longer enrolled in the SFA program."¹⁰⁰ And that "the table below indicates, to the best of DOEE's knowledge, the number of allocation reports that have been re-issued by Pepco due to

⁹⁸ *Id.*, ¶ 21.

⁹⁹ *Id.*

¹⁰⁰ *Id.*, ¶ 17.

errors each month.”¹⁰¹ The re-issue of reports indicates errors in the recording of generation and in the allocation of CNM Credits to subscribers.

Month/Year	Notes
July 2020	One aggregation re-issued
August 2020	Some aggregations re-issued
September 2020	Some aggregations re-issued
October 2020	Some aggregations re-issued
November 2020	Some aggregations re-issued
December 2020	All aggregations re-issued
January 2021	All aggregations re-issued
February 2021	All aggregations re-issued
March 2021	All aggregations re-issued
April 2021	All aggregations re-issued
May 2021	All aggregations re-issued
July 2021	Some aggregations re-issued
September 2021	Some aggregations re-issued
November 2021	Some aggregations re-issued

74. Affiant St. Louis explains that Pepco sends a credit allocation file for each CREF to Subscriber Organizations each month, detailing the generation period, tariff rate, each customer’s meter read start and end date (which Pepco labels as “Start Bill” and “End Bill”), and the bill credit kilowatt hour and dollar amounts.¹⁰²

75. But, as Affiants Fisher, St. Louis, and Larsen describe in detail, Subscriber Organizations have consistently received untimely and incorrect allocation reports from Pepco.

76. Affiant Fisher explains that DOEE conducted an internal audit of subscriber billings and Pepco’s allocation reports and found that:

¹⁰¹ *Id.* ¶ 22. DOEE’s first SFA CREFs received ATOs in late December of 2019. DOEE received the most recent SFA aggregation reports on February 14, 2022, which covered January 2022. Even these most recent reports contain errors that may need to be corrected and re-issued.

¹⁰² St. Louis Aff. ¶ 31.

- allocation reports are not provided on time;
- allocation reports are often incomplete or contain errors;
- allocation reports are often re-issued;
- generation data recorded by the DCSEU indicates that Pepco is using its own proprietary meters to record generation; and
- Pepco’s meters may be undercounting generation with regularity.

77. Affiant St. Louis “explains that there have been instances where CleanChoice does not receive the files on or before the 10th business day of each month. . . Some of these instances resulted in customers not seeing their community solar credits on bills and/or receiving a delayed community solar bill from CleanChoice.”¹⁰³

78. Affiant St. Louis further states that “CleanChoice Energy has occasionally received the wrong [CREF generation] data, for [CREFs] owned and operated by other organizations. . . These errors are a breach of customers’ confidential account information and potentially disclose Subscriber Organization and CREF confidential and proprietary business information to competitors.”¹⁰⁴

79. Pepco has violated D.C. Code §§ 34-1518(b) and 15 DCMR § 907 by not providing accurate and timely CNM Credits to customers, including undercounting CREF generation, providing lower than expected or zero benefits to SFA customers, and delaying the time when subscribers receive their monthly credits.

¹⁰³ *Id.*, ¶ 30.

¹⁰⁴ *Id.*, ¶ 32.

**COUNT 4: PEPSCO MAY BE VIOLATING DISTRICT LAW
BY FAILING TO CONSISTENTLY ACCOUNT FOR
CARRY OVER CREDITS.**

80. The D.C. Code requires that “[i]f the value of the credits generated by the community renewable energy facility allocated to the subscriber exceeds the amount owed by the subscriber as shown on the subscriber’s bill at the end of the billing period, the remaining value of the credit shall carry over from month to month until the value of any remaining credits are used.”¹⁰⁵

81. Affiant St. Louis explains that “[t]he allocation files that CleanChoice Energy receives from Pepco do not contain information on whether the bill credit amount contains carry-over credits. Feedback received from Pepco has been that they simply pay any credit amount over 100% of their usage back to the customer as a line item on their bill; however, there is no easy way for Subscriber Organizations to reasonably verify that this is occurring.”¹⁰⁶

82. Affiant St. Louis further explains that “Subscriber Organizations currently do not have the ability to provide customers with accurate information regarding their carry-over or banked credits or cash-outs, which can cause customer mistrust. CleanChoice has also experienced customers canceling service because of this issue.”¹⁰⁷

83. Greater transparency on the allocation of carry-over credits would allow Subscriber Organizations to provide customers with accurate information regarding the value of their current banked credits still to be provided to them.

¹⁰⁵ D.C. Code § 34-1518(b)(5)(K).

¹⁰⁶ St. Louis Aff. ¶ 23.

¹⁰⁷ *Id.*, ¶ 24.

**COUNT 5: PEPCO HAS VIOLATED THE COMMISSION'S BILLING
REGUATIONS BY FAILING TO TIMELY REPORT BILLING ERRORS
RELATED TO CREFS.**

84. When a billing error occurs that affects one hundred (100) or more customers, 15 DCMR § 304.16 requires Pepco to provide an initial notification of the error to the Commission and OPC within five (5) business days of discovering the error or of being notified of the error. The initial billing error notice is to be emailed to the Commission and OPC first, and to be subsequently filed in writing at the Commission with a copy to OPC.

85. The initial billing error notice must provide the following information: (a) type(s) of billing error(s) found; (b) date and time the billing error(s) was/were discovered; (c) how Pepco discovered the error; and (d) the approximate number of customers affected.¹⁰⁸

86. Within fourteen (14) calendar days of the initial billing error report, Pepco must file a follow-up written report at the Commission, with a copy to OPC, with the following information: (a) type(s) of billing error(s) found; (b) date(s) and time(s) of the billing error(s); (c) number of customers affected; (d) cause of the error(s) and status of any and all corrective action(s) taken; and (e) timeline for completing any and all other required corrective action(s), which must include the provision of refunds and/or credits to be received by the customer no later than 60 days after the billing error(s) was/were discovered, as necessary to correct the billing error(s).¹⁰⁹

87. Within sixty (60) calendar days from the date the billing error(s) was/were discovered, Pepco is to file with the Commission, with a copy to OPC, a final report that contains the following information: (a): type(s) of billing error(s); (b) date(s) and time(s) of billing error(s); (c) number of customers affected, and the dollar amount(s) involved; (d) duration of the billing

¹⁰⁸ 15 DCMR § 304.17.

¹⁰⁹ 15 DCMR §§ 304.16(b), 304.18.

error(s); (e) cause of the error(s), and corrective action(s) and preventative measure(s) taken; and (f) lessons learned, if any.¹¹⁰

88. The Commission uses the foregoing information to determine whether further investigation into the cause for the billing error(s) is necessary.¹¹¹

89. Finally, 15 DCMR § 304.21 requires Pepco, within sixty (60) days of error discovery, to notify each affected customer of the following: (a) the nature of the error; (b) the amount by which the customer's previous bill(s) was/were inaccurate; (c) if appropriate, the steps Pepco will take to ensure that the customer receives a full refund if overbilled, or when customers will be required to make payment if underbilled; and (d) the nature of the billing error and any corrective action(s) that the company intends to implement.¹¹²

90. Pepco failed or refused to provide the Commission, OPC, and its customers with timely and complete billing error notifications required by 15 DCMR §§ 304.16, 304.17, 304.18, 304.19, and 304.21.

91. Affiant Fisher reports that Pepco has filed four (4) billing error notices regarding CREF billing since the inception of the program,¹¹³ but that “DOEE is aware of additional billing errors impacting more than 100 Pepco customers/SFA subscribers for which OPC and the Commission were not notified.”¹¹⁴ Affiant Fisher’s affidavit includes the following table of unreported billing errors that DOEE is aware have occurred.¹¹⁵

¹¹⁰ 15 DCMR §§ 304.16(b), 304.19.

¹¹¹ 15 DCMR § 304.20.

¹¹² 15 DCMR § 304.21.

¹¹³ BE2020-03-E filed on July 30, 2020; BE2021-06-E filed August 11, 2021; BE2021-11-E filed October 28, 2021; BE2021-12-E filed December 22, 2021.

¹¹⁴ Fisher Aff. ¶ 41.

¹¹⁵ *Id.*

<i>Month / Year</i>	Description	# Customers Impacted	\$ Amount	Billing Error Notice Filed
<i>Sept. 2021</i>	SFA04 subscribers received incorrect credits on their Sept. 2021 bills.	325	\$5,783.86	Yes
<i>Aug. 2021</i>	SFA09 subscribers received a \$0 credit on their Aug. 2021 bills.	329	\$22,661.86	No
<i>July 2021</i>	SFA01 subscribers received very low credits (\$5.29) on their July 2021 bills. The average credit should have been ~\$65.	987	\$56,289.80	Yes
<i>Nov. 2020 to July 2021</i>	SFA19 (VCREF) subscribers received 0 credits between Jan. 2021 and July 2021	9	Insufficient data to perform calculation	N/A
Insufficient data to determine dates	Ongoing issues with undercounted generation at SF06.	754	Insufficient data to perform calculation	No
<i>June-July 2020</i>	Subscribers from SFA01, SFA02, SFA03, and SFA04 were under-credited in July and June of 2020. While 160 subscribers were over-credited.	Under-credited: 1,683 Over-credited: 160	Under-credited: \$50,640.99 Over-credited: \$2,322.2	No
<i>November 2020 – August 2021</i>	SFA05 subscribers were under-credited between November 2020 to August 2021.	417	Insufficient data to perform calculation	No
<i>June-Dec. 2020</i>	Subscribers of SFA02 were incorrectly billed	89	~\$3,000	N/A
<i>Oct. 2020</i>	Subscribers of SF04 were incorrectly billed	341	Insufficient data to perform calculation	No
<i>May-July 2020</i>	Credits were not received by most subscribers	Insufficient data to perform calculation	Insufficient data to perform calculation	Partial report filed

92. Pursuant to 15 DCMR § 304.22, the Commission may impose sanctions for each violation of the Commission’s rules on billing error notifications.¹¹⁶

**COUNT 6: PEPCO HAS VIOLATED DISTRICT LAW BY BILLING
CREF SYSTEMS FOR NET ENERGY METERING.**

93. Commission rules are absolute in requiring that “in no event shall the electricity generated by a CREF be eligible for net energy billing.”¹¹⁷

94. The reason for this rule becomes clear when a distinction is made between the Net Energy Metering (“NEM”) billing and CREF payment mechanisms. Under the NEM billing mechanism, individual consumers’ electric bills are reduced by the amount of electricity that these individual system owners generate.¹¹⁸ When a NEM customer-generator consumes more electricity than they generate, Pepco bills the NEM customer-generator the difference.¹¹⁹

95. CREFs use “community net metering” in which the monetary value of electricity generated by the CREF, which is not located at the subscriber’s personal premises, is used to offset electric charges accrued during a subscriber’s applicable billing period.¹²⁰ CREFs and Subscriber Organizations export all of the electricity they generate directly to Pepco’s distribution system, unlike NEM generators who consume the electricity they generate.¹²¹

¹¹⁶ 15 DCMR § 304.22.

¹¹⁷ 15 DCMR § 907.4.

¹¹⁸ 15 DCMR §§ 903.2, 903.3, and 903.5.

¹¹⁹ 15 DCMR § 903.4; *see also* 15 DCMR § 999, defining “customer-generator” as “a residential or commercial customer that owns (or leases or contracts) and operates an electric generating facility that: (a) has a capacity of not more than 1000 kilowatts; (b) uses renewable resources, cogeneration, fuel cells, or microturbines; (c) is located on the customer’s premises; (d) is interconnected with the Electric Company’s transmission and distribution facilities; and (e) is intended primarily to offset all or part of the customer’s own electricity requirements.”; *accord* D.C. Code § 34-1501(15).

¹²⁰ D.C. Code § 34-1501(9A).

¹²¹ *See* D.C. Code § 34-1518.01(j).

96. Although CREF systems are generators, not customers, Pepco has been sending bills to CREFs that resemble net metering bills.¹²²

97. Affiant Fisher reports that “DOEE [a CREF Subscriber Organization] has received about 1000 paper bills, including 5 past due balance notices for outstanding charges.”¹²³ An example of a bill with a positive balance typical of a net metering bill is included as Exhibit A-5, and an example of a past due balance notice is included as Exhibit A-6.

98. On February 22, 2022, Pepco filed a 60-Day Billing Error Notification Report in Docket No. BE-2022 stating that “[t]he Green Power Connection (GPC) team received an inquiry from a CREF Subscriber Organization stating that it was being billed for usage in error. After investigation, it was determined that 111 DC subscriber organizations were overcharged by a total of \$2,063.69 over the course of up to 16 months.” Pepco’s own report confirms that it is sending bills to Subscriber Organizations. Additionally, there are several issues with Pepco’s February 22, 2022 report, including that:

- Billing Error Notifications are for errors in *customer* bills,¹²⁴ and CREF Subscriber Organizations are electricity generators, not customers.
- According to Pepco’s most recent CREF report, there are “26 Subscriber Organizations that handle subscriptions of the CREFs” in the District of

¹²² See Larsen Aff. ¶ 18, Attachment D-3.

¹²³ Fisher Aff. ¶ 37.

¹²⁴ 15 DCMR § 304. Indeed, the provisions for Billing Error Reports are included in Chapter 3 of the Commission’s regulations which outline *Consumer* Billing Rights and Responsibilities. However, a misapplication of CNM Credits to a single CREF could trigger an obligation for Pepco to submit a Billing Error Report because a single CREF could have over 100 subscribers who are also Pepco customers entitled to receive accurate credits on their electricity bills.

Columbia,¹²⁵ significantly less than the “111 DC subscriber organizations” purported to be affected by Pepco’s billing error in the Notification discussed above.

99. Pepco practices of sending bills to Subscriber Organizations indicate Pepco is using NEM billing practices in violation of 15 DCMR § 907.

COUNT 7: PEPKO’S ACTIONS CONSTITUTE NEGLECT, WASTE RATEPAYER RESOURCES, AND FRUSTRATE THE ABILITY OF THE DISTRICT TO ACHIEVE ITS CARBON REDUCTION GOALS.

100. Pepco’s practices and policies with respect to its implementation of CREF-related statutes and regulations is frustrating the District’s ability to achieve the clean energy and equity goals set forth in legislation, including DOEE’s SFA program, all of which Pepco’s customers ultimately fund.¹²⁶

¹²⁵ RM9-2015, *In the Matter of the Public Service Commission of the District of Columbia's Intent to Adopt Chapter 9, "Net Energy Metering," of Title 15 of the District of Columbia Municipal Regulations (DCMR)*, Potomac Electric Power Company Report on Community Renewable Energy Facilities, filed January 18, 2022, available at: <https://edocket.dcpsec.org/apis/api/Filing/download?attachId=145073&guidFileName=6bfaaa94-3c12-4f0f-a372-5f47693b522a.pdf>.

¹²⁶ “Renewable Energy Portfolio Standard”, D.C. Code § 34-1432(c), set forth annually escalating minimum percentage amounts of total District electricity supply that must be sourced from District-sited solar facilities. In 2022, 2.6% of the total electricity supply in the District must be generated by solar. By 2041, that amount must reach 10%. *See also*, “Solar for All Program”, D.C. Code § 8-1774.16(a), stating “(1) There is established the Solar for All Program (“Program”) to increase the access of seniors, small local businesses, nonprofits, and low-income households in the District to the benefits of solar power. (2) The Program shall provide the long-term financial benefits of solar energy production to at least 100,000 District low-income households in an amount equivalent to at least 50% of the District's average residential electric bills for calendar year 2016 by December 31, 2032. The Department shall, to the extent feasible, meet this goal by reducing low-income households' electric or gas bills by at least 50%.” The primary source of funding for DOEE’s Solar for All program is the REDF, which is primarily funded by Renewable Portfolio Standard compliance fees paid by District electricity suppliers, D.C. Code § 34-1434(c), the costs of which may be passed onto ratepayers. Supplemental funding for DOEE’s Solar for All program comes from the Sustainable Energy Trust Fund, D.C. Code § 8-1774.10(c)(12)(A)(i), which is funded by a direct surcharge on ratepayers’ bills.

101. Pepco's CREF-related practices and policies alleged in this Petition, and detailed in supporting affidavits attached to this Petition, constitute neglect within the meaning of D.C. Code § 34-402, including *inter alia*:

- a. Failing to determine the amount of CREF-generated electricity each month by reading a CREF owned revenue quality production meter, and instead improperly installing, and using readings from, a Pepco-owned and installed meter.
- b. Failing to accurately calculate and pay Subscriber Organizations for unsubscribed energy associated with each CREF.
- c. Failing to correctly and timely meter, allocate, and credit CREF subscribers for electricity generated.
- d. Failing to timely rectify CREF subscribers' incorrect bills (i.e., CNM Credits, including any missing carry-over credits).
- e. Failing to implement an automated process to properly allocate and apply credits to CREF customers' bills, including verifying the customer account and service numbers and accessing historical usage data, as opposed to relying on manual data entry.¹²⁷

102. Pepco's failure to timely and accurately apply CNM Credits harms all subscribers, but especially low-income Solar for All program participants who have a high energy burden and who may be unfairly exposed to the threat of disconnection as a result of the misapplied CNM Credits.

¹²⁷ St. Louis Aff. ¶¶ 31-36.

103. Pepco’s failure to timely and accurately apply CREF payments raises questions as to how many CNM Credits are unaccounted for due to significant accounting errors. This lack of transparency regarding CREF payments makes it impossible to verify whether the payments remitted by Pepco are correct, undermines the credibility of Subscriber Organizations, and reduces consumer confidence in CREFs and the SFA program, undermining the District’s ability to meet its renewable energy goals.

104. Further, Pepco’s operational practices frustrate the efficient operations of CREFs and the SFA program and undermine confidence in the program. For example,

- a. Affiant Fisher explains that DOEE has received complaints from Pepco customers that bring into question whether Pepco customer service representatives are adequately knowledgeable of CREFs and the SFA program. The complaints indicate that, when District of Columbia residents who subscribe to SFA call Pepco to inquire about their CNM Credits, the customer service representatives are unaware of the existence of the SFA program.¹²⁸
- b. Affiant Gaetaniello explains that the enrollment and customer verification process is onerous. Affiant Gaetaniello specifically states that “it may be that several months pass before we can actually determine the validity of a new enrollment. . . Ideally, we would be able to verify enrollments during the enrollment phase or shortly thereafter.”¹²⁹

¹²⁸ Fisher Aff. ¶¶ 17-18.

¹²⁹ Gaetaneillo Aff. ¶17.

- c. Affiant St. Louis further explains that “[e]nrollment is also hampered by Pepco’s data requirements. Currently Subscriber Organizations are required to submit both an Account Number and a 22-digit Service Number to enroll a single customer. In many cases where the customer submits either number incorrectly, the enrollment fails and cannot be processed. This creates delays for that customer to enroll in the solar farm and creates additional work for CleanChoice Energy and other Subscriber Organizations to contact the customer to receive the correct numbers.”¹³⁰
- d. Affiant St. Louis further states that Pepco “verifies customer accounts only after the solar farm is activated (i.e. when the solar farm goes live for the first time). This is potentially weeks after the Subscriber Organization submits the allocations. For our new, non-active farms, CleanChoice does not have insight into the fact our customers have dropped, nor do we receive transaction data for when those drops occurred. For example, customers may have moved or canceled their enrollment in between the point of sale and the activation of the solar farm.”¹³¹ “Because Pepco does not verify enrollment submissions immediately for projects which are not yet active, Subscriber Organizations have little visibility into what accounts are properly enrolled and therefore, will be receiving credits for their subscription allocation of the solar farm. When Subscriber Organizations receive the customer account verification from Pepco, there may be farms

¹³⁰ St. Louis Aff. ¶ 18.

¹³¹ *Id.*, ¶ 20.

that are now undersubscribed due to these customer drops. This adds pressure to the Subscriber Organization to quickly find new subscribers, potentially affecting their bottom line and the success of the program.”¹³² For farms that are already active, Pepco notifies Subscriber Organizations of any rejects on a monthly basis (formally, a quarterly basis) through either the credit allocation file or the Community Solar Portal. Affiant St. Louis recommends that “Pepco should be directed to verify a customer account within two (2) business days of an enrollment being submitted.”¹³³

105. Pepco has failed to conduct its CREF- and SFA-related operations in accordance with the District Code and the Commission’s regulations and has employed an onerous enrollment and customer verification process. Pepco has neglected its legal responsibilities, wasted ratepayer resources, and undermined the ability of the District to achieve its clean energy objectives by weakening public confidence in CREFs and SFA and causing financial harm to the Subscriber Organizations that own and operate CREFs.

IV. RELIEF REQUESTED

106. The Joint Petitioners aver that if the violations persist, Pepco’s noncompliance with District law and Commission regulations will thwart the District’s clean energy and climate goals because fewer residents and Subscriber Organizations will participate in the CREF marketplace and the SFA program. Accordingly, Joint Petitioners request the Commission grant the following relief:

¹³² *Id.*, ¶ 21

¹³³ *Id.*

- a. The Commission should compel Pepco to remove its proprietary meters and instead only use the revenue grade meters installed by the developers to determine CREF's electricity generation, as is required by the D.C. Code. This would correct the problem of unverified and incorrect generation data from Pepco that CREFs, including those that serve the SFA program, have been experiencing.
- b. The Commission should institute a formal investigation into Pepco's CREF practices, including investigating the timeliness and accuracy of (1) Pepco's allocation reports, (2) attribution of CNM Credits to subscribers, and (3) unsubscribed energy payments to Subscriber Organizations.
- c. As part of the investigation, the Commission should procure an independent third-party audit of Pepco's metering and crediting processes. Based on the results of the audit, the Commission should:
 - i. direct Pepco to implement process improvement(s) that bring the Company into compliance with District law and regulations for CREFs, including improvements that will ensure timely allocation of CNM Credits, and that match the generation and billing months; and
 - ii. adopt appropriate reporting requirements and oversight to ensure that these issues are corrected going forward.
- d. Also, as part of the investigation, the Commission should procure an independent third-part audit of Pepco's CREF subscriber management, meter readings, allocation reports, and billing and crediting practices. This

audit should examine these practices for each operational CREF starting from the initial date of operation of each facility. Based on the results of the audit, the Commission should compel:

- i. Pepco to timely provide accurate credit refunds to CREF subscribers based on the correctly metered data;
 - ii. Pepco to correctly and timely remit missing and corrected unsubscribed energy payments to Subscriber Organizations. The Commission should ensure that the LMP price has been appropriately calculated and ensure oversight of and transparency in the process for doing so going forward; and
 - iii. Provide public education on the issues found in the audit and the steps that Pepco is taking to correct them.
- e. Based on the results of the audit(s), the Commission should impose sanctions pursuant to D.C. Code § 34-706 in the amount of \$5,000 for each instance in which Pepco violated Title 34 of the D.C. Code and the Commission's regulations and orders, including, as authorized by 15 DCMR § 304.22, sanctions in the amount of \$5,000 for each instance in which Pepco failed to submit a Billing Error Notification pursuant to 15 DCMR § 304.16.
- f. Pursuant to D.C. Code §§ 34-1508(a)(2) and (b)(1), the Commission should impose additional sanctions up to \$10,000 for each act by Pepco that violated a provision of Title 34, Chapter 15, and any associated Commission order or regulation related to CREFs.

- g. The Commission should prohibit Pepco from disconnecting services to CREF subscribers who have been negatively affected by the actions raised in this complaint until the Company resolves the problems.
- h. The Commission should further direct that:
 - i. Pepco bear any expenses related to this Complaint and associated formal investigation, including costs related to removing the Pepco meters from the CREFs, participating in and providing information for the conduct of the audit, providing refunds to the subscribers and Subscriber Organizations, implementing the correctional program, and paying sanctions, and
 - ii. Pepco shall be prohibited from passing such expenses onto CREF developers, Subscriber Organizations, CREF subscribers, and its general body of ratepayers.

V. CONCLUSION

Wherefore the Joint Petitioners request that the Commission commence a formal investigation into Pepco's CREF practices, and grant the relief requested herein along with any other remedy that the Commission deems appropriate.

Respectfully submitted,

KARL A. RACINE
Attorney General

KATHLEEN KONOPKA
Deputy Attorney General
Public Advocacy Division

/s/ Jennifer L. Berger
JENNIFER L. BERGER (D.C. Bar # 490809)
Chief, Social Justice Section

/s/ Brian Caldwell
BRIAN CALDWELL (D.C. Bar # 979680)
Assistant Attorney General
Office of the Attorney General
for the District of Columbia
400 6th Street N.W., 10th Floor
Washington, D.C. 20001
(202) 727-6211 (office)
(202) 445-1952 (mobile)
Brian.caldwell@dc.gov

*Attorneys for the District of Columbia
Government*

/s/ Sandra Mattavous-Frye
Sandra Mattavous-Frye
People's Counsel
D.C. Bar No. 375833

Karen R. Sistrunk
Deputy People's Counsel
D.C. Bar No. 390153

Laurence Daniels
Director of Litigation
D.C. Bar No. 471025

Anjali G. Patel
Litigation Supervisor
D.C. Bar No. 1000826

Thaddeus Johnson
Assistant People's Counsel
D.C. Bar No. 1021596

Knia Tanner
Assistant People's Counsel
D.C. Bar No. 985496

**OFFICE OF THE PEOPLE'S COUNSEL
FOR THE DISTRICT OF COLUMBIA**
1133 Fifteenth Street, NW, Suite 500
Washington, DC 20005

EXHIBIT LIST

Exhibit A	Affidavit of Alex Fisher
<i>Exhibit A-1</i>	Pepco Electric Bill, Issue date: March 19, 2021-REVISED BILL for the period May 19, 2020 to March 17, 2021 CONFIDENTIAL
<i>Exhibit A-2</i>	List of Solar for All (“SFA”) Community Renewable Energy Facilities (“CREFs”)
<i>Exhibit A-3</i>	Pepco Electric Bill, Issue date: August 25, 2020 for the period July 23, 2020 to August 21, 2020 CONFIDENTIAL
<i>Exhibit A-4</i>	Pepco Check, Voucher Date: 01/19/22 issued to the DC Gov’t Department of Energy & Env CONFIDENTIAL
<i>Exhibit A-5</i>	Pepco Electric Bill, Issue date: June 25, 2021 for the period May 25, 2021 to June 23, 2021 CONFIDENTIAL
<i>Exhibit A-6</i>	Letter from Pepco to DC Gov’t Department of Energy & Environment, dated August 24, 2021, RE: Past Due Balance Reminder CONFIDENTIAL
<i>Exhibit A-7</i>	Allocation Report for SFA CREFS for the period 03/25/2020 to 05/07/2020 CONFIDENTIAL
<i>Exhibit A-8</i>	List of DOEE and Pepco meeting dates and associated DOEE notes
<i>Exhibit A-9</i>	CREF Production and CNM Credit Allocation for the Solar for All Program, DOEE-Pepco Meeting (DOEE Presentation dated July 17, 2020) CONFIDENTIAL
Exhibit B	Affidavit of Armando Gaetaniello
<i>Exhibit B-1</i>	Gaetaniello Curriculum Vitae
Exhibit C	Affidavit of Paul St. Louis CONFIDENTIAL
<i>Exhibit C-1</i>	St. Louis Curriculum Vitae
<i>Exhibit C-2</i>	List of CleanChoice Energy CREF Projects CONFIDENTIAL
<i>Exhibit C-3</i>	Email from Pepco, dated August 4, 2021, re Community Solar Unsubscribed Energy Credits CONFIDENTIAL
<i>Exhibit C-4</i>	May – November 2020 Reports CONFIDENTIAL
<i>Exhibit C-5</i>	CleanChoice Energy Communications to Customers
<i>Exhibit C-6</i>	Letter from Solar Energy Industry Representatives to Pepco, dated September 16, 2020, Subject: PEPCO and Delmarva Delays in Monthly Reporting of CSEGS Bill Credits
<i>Exhibit C-7</i>	Letter from Pepco to Mr. David W. Beugelmans, dated October 20, 2020, Subject: Response to September 16, 2020 Communication Regarding PEPCO and Delmarva Monthly Reporting of CSEGS Bill Credits

Exhibit D	Affidavit of Erin Larsen
<i>Exhibit D-1</i>	Larsen Curriculum Vitae
<i>Exhibit D-2</i>	List of New Columbia Solar CREFs CONFIDENTIAL
<i>Exhibit D-3</i>	Pepco Electric Bill, Issue date: October 28, 2019-PAST DUE NOTICE for the period September 27, 2019 to October 25, 2019 CONFIDENTIAL
<i>Exhibit D-4</i>	Pepco Checks, Voucher Dates 1/13/22 and 1/19/22
<i>Exhibit D-5</i>	Emails from New Columbia Solar to Pepco, dated February 2, 2022, and from Pepco to New Columbia Solar, dated February 7, 2022 re Pepco Checks CONFIDENTIAL
Exhibit E	Affidavit of Matthew Fallon CONFIDENTIAL
Exhibit F	Affidavit of Danielle Devery CONFIDENTIAL
<i>Exhibit F-1</i>	Undated letter from Pepco to Ms. Devery CONFIDENTIAL
Exhibit G	Affidavit of Thomas Crowder CONFIDENTIAL
<i>Exhibit G-1</i>	Pepco Electric Bill, Issue date: January 10, 2022, for the period December 4, 2021 to January 6, 2022 CONFIDENTIAL
Exhibit H	Affidavit of David Murray CONFIDENTIAL

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

In the Matter of	§	
	§	
the Complaint and Investigation into	§	
Potomac Electric Power Company's	§	Formal Case No. _____
Community Renewable Energy	§	
Facility Practices	§	

AFFIDAVIT OF ALEXANDRA FISHER

I. INTRODUCTION AND QUALIFICATIONS

1. My name is Alexandra Fisher. I am a Policy Analyst with the District of Columbia Department of Energy and Environment (DOEE). This affidavit was prepared by me or under my direct supervision and control and I have direct knowledge of the matters discussed herein.

2. I am submitting this affidavit to delineate the problems that DOEE has experienced working with the Potomac Electric Power Company (Pepco) to administer DOEE's Solar-for-All (SFA) program—and in particular problems related to Pepco's metering and billing practices for Community Renewable Energy Facilities (CREFs).

3. I have worked at DOEE for 3.5 years as a Policy Analyst. As a Policy Analyst, my responsibilities include supporting the implementation of the District's climate goals and mandates for energy transition, grid modernization, distributed energy resource (DER) interconnection, and microgrids through regulations and policy. I have also been heavily engaged in proceedings and working groups before the Public Service Commission of the District of Columbia (Commission or PSC) that are related to these topics, and with data analysis and geographic modeling of the energy transition at the neighborhood scale.

4. Prior to working at DOEE, I was employed at Green Powered Technology and EarthSpark International where my responsibilities included managing projects related to renewable energy projects, such as solar microgrids. I have 13 years of work experience in the energy and environmental fields. I received a Master's degree in Energy, Resources, and the Environment in 2015 from Johns Hopkins School of Advanced International Studies, and a Bachelor's degree in Environmental Policy in 2010 from Middlebury College.

II. SUMMARY OF AFFIDAVIT & FINDINGS

5. My affidavit can be summarized as follows:

- SFA is an environmental justice program legislated by the DC Council and implemented and administered by DOEE.
- CREFs are important for enabling SFA because they allow District residents who rent or do not have adequate roof space upon which to install solar panels to receive solar energy.
- Pepco's currently inadequate CREF billing practices threaten to undermine the operation of SFA. Regular, accurate billing and subscriber credit allocation reporting is critical to the success of SFA. Delayed and/or inaccurate billing and subscriber credit allocation reporting harm the beneficiaries of the program, undermine public confidence in the program, and adversely affect DOEE's program implementation and reputation.
- DOEE has had challenges implementing CREFs for SFA due to issues with subscriber management and billing. This specifically includes dealing with errors that occur with regularity in metering, allocation reporting, and billing. DOEE has

received complaints from SFA subscribers and, as a result, conducted an internal audit of CREF billing for SFA. The internal audit was incomplete as DOEE does not possess all of the data necessary to conduct a complete audit.

- However, the audit raised serious concerns within DOEE that Pepco’s billing and other CREF practices are out of compliance with multiple statutes and Commission regulations that establish the parameters by which CREFs function and deliver their intended benefits to District residents, including laws related to billing, allocating subscriber credits, meter ownership, and interconnection.
- DOEE has made several attempts to resolve issues directly with Pepco, but these issues persist, in spite of the efforts made by Pepco to address DOEE’s concerns.

III. DISCUSSION

A. Legislative Background on the Solar for All program and Community Renewable Energy Facilities

6. SFA is an environmental justice program created by the DC Council’s Renewable Portfolio Standard Expansion Amendment Act of 2016, with the purpose of ensuring equitable access to solar energy for all District residents in a manner that reduces the energy burden¹ on low- and moderate-income households.² The stated purpose of SFA is “to increase the access of seniors, small local businesses, nonprofits, and low-income households in the District to the benefits of

¹ D.C. Code § 8-1774.16(g)(2) defines “energy burden” as “the percentage of household income spent on home energy bills.”

² See D.C. Code § 8-171.03(13) (“The energy policy of the District of Columbia shall be . . . [t]o utilize public funds as a means of ensuring equity in the way energy costs are allocated, including, but not limited to, programs which will aid low- and moderate-income citizens in . . . gaining access to renewable sources of energy and in meeting the costs of high utility bills.”).

solar power.”³ SFA’s legislative mandate is to reduce by at least 50% the electric bills of at least 100,000 of the District’s low-income households by December 31, 2032.

7. The DC Council passed the Community Renewable Energy Amendment (CREA) Act of 2013, which established the CREF as a means for renters and homeowners lacking adequate rooftop space to take advantage of solar energy savings by purchasing energy subscriptions in the generation capacity of off-site solar installations located within the District of Columbia. The solar energy generated by CREFs is used by Pepco, as the Standard Offer Service (SOS) Administrator, to offset wholesale energy purchases needed to meet Pepco’s total SOS supply.⁴

B. Description of CREF Crediting Process

8. The amount of electricity generated by a CREF each month and that is available for Pepco to purchase is to be determined by a revenue quality production meter installed and paid for by the owner of the CREF. The meter is to be read by Pepco.⁵

9. In return for the electricity generated, CREF subscribers receive a credit relative to the size of their capacity investment (subscription) in the CREF. The credit appears on their electricity bills to offset energy charges accrued by the subscriber during that billing period. This billing arrangement is known as community net metering (CNM).⁶

10. Electricity generated by a CREF is not eligible for net energy metering (NEM) billing.⁷

³ D.C. Code § 8-1774.16.

⁴ D.C. Code § 34-1518.01(i).

⁵ DC Code § 34–1518(b)(5)(H); 15 DCMR § 907.4.

⁶ DC Code § 34–1501(9A).

⁷ 15 DCMR § 907.4.

11. Subscriber Organizations own and operate (either directly or through a contract with a third party) CREFs and manage subscriptions to the CREF. Any energy produced by a CREF in excess of what is accounted for through CREF subscriptions is known as unsubscribed energy. Pepco, as the SOS Administrator, must purchase the unsubscribed energy at the PJM Locational Marginal Price for the Pepco zone⁸ and credit that amount to the Subscriber Organization associated with the CREF project.

C. CREF Contribution to SFA

12. SFA is administered by DOEE in coordination with the DC Sustainable Energy Utility (DCSEU),⁹ which contracts with third parties to build CREFs. DOEE acts as a Subscriber Organization for CREFs that are part of the SFA program, managing subscriptions to CREFs built pursuant to DCSEU-third party contracts.

13. According to DOEE's internal records, subscribers to SFA-funded CREFs make up about 72% of all CREF subscribers in the District. DOEE is the Subscriber Organization for 166 CREFs, which is 55% of the total number of CREF systems in the District of Columbia.

14. CREFs are critical to the success of SFA. At this time, 94% of SFA beneficiaries are served by CREFs. The remaining 6% of SFA recipients are served by individually net metered rooftop solar. This is because, while 60% of District of Columbia residents are renters, the majority of renters are the District's low- and moderate-income residents who qualify for participation in the program.¹⁰ CREFs also have operational and cost efficiencies compared to individually net metered rooftop solar projects.

⁸ DC Code § 34-1518.01(i).

⁹ D.C. Code § 8-1774.16(b).

¹⁰ To qualify for SFA, total household income must be 80% or less of Area Median Income (See <https://doee.dc.gov/solarforall> for more information). This is the same income threshold currently used to qualify

D. CREF Billing Issues

15. In order for SFA to be a successful program, DOEE must receive timely, accurate billing information, and the SFA subscribers to CREFs must receive regular and accurate bill credits.

16. If SFA CREF subscribers do not regularly receive correct benefits, it (a) results in financial harm to low- and moderate-income District residents because these households are not receiving expected discounts on their electricity bills; and (b) undermines public confidence in the program and the ability to recruit additional participants to meet the program's target of serving at least 100,000 low-income households.

17. DOEE has received complaints about:

- SFA subscribers receiving lower than expected or zero CREF benefits on their Pepco bills.¹¹
- SFA subscribers calling Pepco customer service to inquire about CNM credits and, in response, the Pepco representatives stating that they are unaware of the existence of the SFA program.
- SFA subscribers being re-billed in a manner that causes confusion or concern that subscribers are no longer enrolled in the SFA program or that their enrollment in

households for participation in Pepco's Residential Aid Discount (RAD) program. However, RAD reduces only the distribution portion of a household's electricity bill, while SFA is designed to reduce the more substantial generation portion of a household's electricity bill.

¹¹ DOEE noted issues with CREF subscribers receiving on-time community net metering (CNM) credits in a filing to the Commission in the RM40-2020-01 docket: "Some CREF subscribers that are not receiving their full allocation of credits in a timely manner." Docket No. RM40-2020-01, *In the Matter of 15 DCMR Chapter 40, District of Columbia Small Generator Interconnection Rules*, Department of Energy and Environment's Comments in Response to the Proposed Rulemaking RM40-2020-01, filed July 15, 2020.

the SFA program is causing issues with their Pepco account. An example of a customer re-billing is included as Attachment A-1.

18. Due to repeated missing and inaccurate allocation reports and the number of complaints from subscribers, DOEE made an effort to internally audit subscribers' billings. DOEE has access to a Pepco portal¹² to review SFA subscriber bills for up to 12 months. However, it was not possible to download and review each bill for every SFA subscriber due to the large number of SFA subscribers and the 12-month portal limit. DOEE has therefore audited the allocation reports¹³ that Pepco provides along with SFA's generation data. DOEE's review has found that:

- allocation reports are not provided on time;
- allocation reports are often incomplete or contain errors;
- allocation reports are often re-issued;
- generation data recorded by the DCSEU indicates that Pepco is using its own proprietary meters to record generation,
- Pepco's meters may be undercounting generation attributable to CREFs with regularity; and
- of the approximately 1000 CREF bills DOEE has received, DOEE has not been receiving payments for unsubscribed energy as a Subscriber Organization on a monthly basis as required by law.¹⁴

¹² The Pepco Community Solar Portal has been difficult for DOEE to use and does not allow easy import or export of data. Pepco required DOEE to enter CREFs as aggregations rather than individually.

¹³ This includes both Pepco's recorded generation for the CREFs and the subscriber's CNM allocations.

¹⁴ 15 DCMR § 907.9 ("Any unsubscribed energy purchased by the SOS Administrator pursuant to Subsection 906.4 will be paid to the CREF Subscriber Organization on a monthly basis.").

1. *Incomplete, incorrect, and missing allocation reports*

19. The table below indicates the number of CREFs that have missing or zero recorded generation according to the DOEE audit of Pepco's allocation reports. The DOEE audit was undertaken in September/October 2021 for the time-period of January 2020 through September 2021.¹⁵

Month/Year	CREFs with Missing or Zero Generation	Estimated Generation Missing from Allocation Reports (kWh)
January 2020	9	5,274
February 2020	19	19,647
March 2020	33	59,370
April 2020	12	47,653
May 2020	n/a*	n/a
June 2020	n/a*	n/a
July 2020	13	89,622
August 2020	19	210,270
September 2020	82	645,703
October 2020	83	546,717
November 2020	30	65,312
December 2020	10	77,490
January 2021	3	44,949
February 2021	8	34,493
March 2021	5	115,741
April 2021	3	38,688
May 2021	9	57,477
June 2021	7	99,427
July 2021	0	0
August 2021	110	1,022,103
September 2021	0	0

20. For those Months with a * designation, the Pepco allocation reports were provided in aggregate. As such, it was not possible for DOEE to break down the information by individual CREF projects.

¹⁵ DOEE has not yet compiled this data from beyond Sept. 2021, but the issue continues to persist.

21. The above data does not include estimated losses in situations when some amount of generation was recorded but was undercounted. Undercounted generation is difficult to summarize because DOEE's review found that DOEE's recorded generation did not match Pepco's recorded generation except in only a few instances, with Pepco's recorded generation typically lower than DOEE's. Between the missing and undercounted generation in the allocation reports, when compared to DOEE's recorded generation, DOEE estimates that SFA generation may have been undercounted by approximately 5,000 MWh as of September 2021, at least in the allocation reporting. It is unclear the extent to which this has resulted in under-crediting of CNM credits to SFA subscribers.

2. *Reissued allocation reports*

22. The table below indicates, to the best of DOEE's knowledge, the number of allocation reports that have been re-issued by Pepco due to errors each month. DOEE's first SFA CREFs received Authorization to Operate (ATO) in late December of 2019. DOEE received the most recent SFA aggregation reports on February 14, 2022, which covered January 2022. Even these most recent reports contain errors that may need to be corrected and re-issued.

Month/Year	Notes
July 2020	One aggregation re-issued
August 2020	Some aggregations re-issued
September 2020	Some aggregations re-issued
October 2020	Some aggregations re-issued
November 2020	Some aggregations re-issued
December 2020	All aggregations re-issued
January 2021	All aggregations re-issued
February 2021	All aggregations re-issued
March 2021	All aggregations re-issued
April 2021	All aggregations re-issued
May 2021	All aggregations re-issued
July 2021	Some aggregations re-issued

September 2021	Some aggregations re-issued
November 2021	Some aggregations re-issued

3. *Pepco's proprietary metering equipment*

23. DOEE has identified other SFA and CREF billing errors by Pepco. For instance, Pepco has been installing its own metering equipment on SFA CREFs and has been using them for billing purposes, instead of using the CREF production meters, even though Pepco is legally obligated to read the revenue quality interval meter.¹⁶

24. The installation of a Pepco meter adds an extra step to the interconnection process.

25. The allocation reports that DOEE receives include a Pepco meter number. The list of known Pepco meter numbers used for SFA CREFs is included as Attachment A-2.

26. There are often discrepancies between Pepco's and DCSEU's/DOEE's recorded generation, and it is likely that every allocation report issued to DOEE and every bill issued to SFA subscribers has been in error.

4. *Timing delays*

27. There is an unexplained two-month delay between the time when an SFA CREF receives ATO and when subscribers begin receiving benefits. As of February 3, 2022, Pepco is unable to articulate the reason for the two-month discrepancy between when a CREF receives ATO and when subscribers begin receiving benefits.

28. Beyond the two-month delay after the initial ATO, Pepco continues to credit SFA subscribers after (at least) a one-month delay -- i.e. generation from June 2021 does not show up

¹⁶ 15 DCMR § 907.4 ("The amount of electricity generated by a CREF each month and available for purchase as subscribed or unsubscribed energy shall be determined by a revenue quality interval meter (production meter) installed and paid for by the Subscriber Organization. . . . It shall also be the responsibility of the Electric Company to read the revenue quality interval meter. In no event shall the electricity generated by a CREF be eligible for net energy billing.").

until the July 2021 billing period. An example of an allocation report with generation and billing dates is included as Attachment A-7.

5. *Failure to compensate for unsubscribed energy*

29. Pepco has not paid unsubscribed energy to DOEE as the Subscriber Organization for SFA on a monthly basis.

30. DOEE is unable to calculate the amount in payments that are missing due to uncertainties in accounting by Pepco (i.e. some of what is recorded as “unsubscribed energy” should potentially have been credited to SFA subscribers).

31. When pressed about failures to compensate for unsubscribed energy in the past, Pepco has told DOEE that compensation has not yet been calculated.

32. DOEE has been receiving paper bills for each CREF from Pepco. DOEE has reviewed a sample of these bills and identified some negative balances, indicating that the unsubscribed energy may have been credited to “customer accounts” instead of being paid out to DOEE as the SFA Subscriber Organization. An example of a bill with a negative balance is included as Attachment A-3.

33. DOEE received three (3) payments from Pepco in 2019, totaling \$20,486.78, for CREFs receiving grants under DOEE’s SFA Innovation and Expansion Grant Program.

34. DOEE received a few unexplained paper checks in mid-January of 2022 from Pepco. An example of such a check is included as Attachment A-4. Pepco has not yet confirmed whether these checks are for unsubscribed energy.

35. Pepco has not provided DOEE with an accounting of how unsubscribed energy is being calculated and whether the generation is being matched to the PJM Locational Marginal Price as required by 15 DCMR § 906.4.

6. *Apparent net metering of CREFs*

36. Additionally, Pepco has been sending bills resembling net metering bills to DOEE for SFA CREFs.

37. Even though Pepco does not have authority to bill CREF systems for any charges (i.e. monthly charge, supply, distribution, etc.),¹⁷ DOEE has received about 1000 paper bills, including 5 past due balance notices for outstanding charges. An example of a bill with a positive balance typical of a net metering bill is included as Attachment A-5. An example of a past due balance notice is included as Attachment A-6.

38. Due to the many questions and uncertainties about the purpose and legality of these bills, DOEE has not paid any of these bills.

E. A full audit of Pepco's CREF billing and metering practices is necessary.

39. Due to the substantial scope of billing errors associated with Pepco's handling of CREFs, DOEE cannot calculate a reasonable estimate of the monetary damages to the overall SFA program without a formal, comprehensive, independent audit.

40. In my opinion, such a comprehensive audit would need to:

- collect all generation data from the CREF revenue-grade interval meters that has been submitted to the PJM Interconnection LLC (PJM) Generation Attribute Tracking System (GATS) in order to re-calculate each CREF's generation;
- re-calculate all allocation reports, ensuring that aggregated allocation reports are correctly issued (i.e. checking that the correct CREF systems are included); and
- re-calculate subscriber CNM benefits.

¹⁷ 15 DCMR 907.4.

F. Pepco has failed to file billing error reports in a timely manner.

41. Pepco has only filed four (4) notices of billing errors to date with the Commission and the Office of People's Counsel (OPC).¹⁸ DOEE is aware of additional billing errors impacting more than 100 Pepco customers / SFA subscribers for which OPC and the Commission were not notified. To the best of DOEE's knowledge, the table below lists unreported billing errors that have occurred.

<i>Month / Year</i>	Description	# Customers Impacted	\$ Amount	Billing Error Notice Filed
<i>Sept. 2021</i>	SFA04 subscribers received incorrect credits on their Sept. 2021 bills.	325	\$5,783.86	Yes
<i>Aug. 2021</i>	SFA09 subscribers received a \$0 credit on their Aug. 2021 bills.	329	\$22,661.86	No
<i>July 2021</i>	SFA01 subscribers received very low credits (\$5.29) on their July 2021 bills. The average credit should have been ~\$65.	987	\$56,289.80	Yes
<i>Nov. 2020 to July 2021</i>	SFA19 (VCREF) subscribers received 0 credits between Jan. 2021 and July 2021	9	Insufficient data to perform calculation	N/A
Insufficient data to determine dates	Ongoing issues with undercounted generation at SF06.	754	Insufficient data to perform calculation	No
<i>June-July 2020</i>	Subscribers from SFA01, SFA02, SFA03, and SFA04 were under-credited in July and June of 2020. While 160 subscribers were over-credited.	Under-credited: 1,683 Over-credited: 160	Under-credited: \$50,640.99 Over-credited: \$2,322.20	No
<i>November 2020 – August 2021</i>	SFA05 subscribers were under-credited between November 2020 to August 2021.	417	Insufficient data to perform calculation	No
<i>June-Dec. 2020</i>	Subscribers of SFA02 were incorrectly billed	89	~\$3,000	N/A

¹⁸ BE2020-03-E filed on July 30, 2020; BE2021-06-E filed August 11, 2021; BE2021-11-E filed October 28, 2021; BE2021-12-E filed December 22, 2021.

<i>Oct. 2020</i>	Subscribers of SF04 were incorrectly billed	341	Insufficient data to perform calculation	No
<i>May-July 2020</i>	Credits were not received by most subscribers	Insufficient data to perform calculation	Insufficient data to perform calculation	Partial report filed

G. Discussions with Pepco on CREF concerns

42. DOEE has held regular meetings with Pepco to resolve the issues around CREF allocation report accuracy, subscriber management, and billing of SFA subscribers. DOEE's records indicate that about 23 meetings with Pepco have been held since July 17, 2020. A non-exhaustive spreadsheet of recorded meetings is included as Attachment A-8.

43. As illustrated in a PowerPoint presentation prepared by DOEE for a meeting held with Pepco on July 17, 2020, the issues identified in this affidavit have been long-standing and unresolved. See Attachment A-9.¹⁹

H. Conclusion

44. In conclusion, the billing irregularities discussed in my affidavit undermine the success of CREFs and other programs in the District, including the CREA and the SFA program. This is of particular importance to DOEE given the large proportion of SFA subscribers served by CREFs. If these deficiencies are not expeditiously corrected and accounted for, interest in the SFA program could be dampened among low- to -moderate-income households who will not experience the energy burden relief that SFA was designed and marketed to accomplish.

¹⁹ Attachment A-9 is redacted in part to protect disclosure of confidential business information.

45. Ultimately, a lack of interest in CREF subscriptions due to Pepco's billing practices means the District will be less likely to meet the aggressive solar carve out requirements of the RPS and accomplish its climate and clean energy goals.

46. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: Alexandra Fisher

Signature: 

Date: ____February 17, 2022____



Your electric bill - Jun 2020 to Mar 2021

for the period **May 19, 2020 to March 17, 2021**

WAYS TO SAVE: FIND TIPS AND PROGRAMS THAT HELP

Learn more at pepco.com/WaysToSave

Account number:

Your service address:

Bill Issue date: Mar 19, 2021 - **REVISED BILL**

Summary of your charges

Balance from your last bill	\$535.28–
Balance forward as of Mar 19, 2021	\$535.28–
New electric distribution charges - Pepco	\$303.34–
New electric supply charges - SOS Provider	\$311.39
Pepco	
Total Credit Amount	\$527.23–

You are currently enrolled in the RESIDENTIAL AID DISCOUNT PROGRAM, and receiving a discount on your bill. For information, visit pepco.com/radprogram or call Pepco at 202-833-7500.

This is a **REVISED BILL** based on a review of your account. If you have any questions, please call the Customer Service number listed in the "How to contact us" section of your bill.

Visit pepco.com/dctariffs and click "DC Terms and Conditions" for information on how payments are applied to balances from Pepco and any competitive supplier.

Your smart electric meter is read wirelessly. Visit My Account at pepco.com to view your daily and hourly energy usage.

If you are moving or discontinuing service, please contact Pepco at least three days in advance.

How to contact us

Customer Service (Mon-Fri, 7am - 8 pm)

202-833-7500

TTY English

1-800-643-3768

TTY Spanish

1-800-546-7111

¿Problemas con la factura?

202-833-7500

Electric emergencies & outages (24 hours)

1-877-737-2662

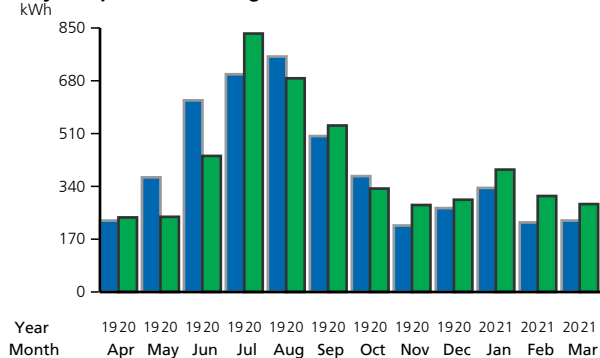
Visit pepco.com for service, billing and correspondence information.

Pepco is regulated by - DC Public Service Commission, dcpsc.org
1325 G St NW, Suite 800, Washington DC 20005, 202-626-5100

Consumer Advocate - Office of People's Counsel, opc-dc.gov
1133 Fifteenth St NW, Washington DC 20005, 202-727-3071

Your monthly Electricity use in kWh

Daily temperature averages: Mar 2020: 48° F Mar 2021: 44° F



Information regarding rate schedules and how to verify the accuracy of your bill will be mailed upon request.

Additional messages may be on the last page of your bill.

Please tear on the dotted line below. Invoice Number: [REDACTED] Page 1 of 15

REVISÉD BILL

Account number

No Payment Due

**Amount
Paid:**

\$.

PO BOX 13608
PHILADELPHIA PA 19101

771 1 AV 0.386

2DR00011

|||||

700001550221345590000000000000000000000008050000000000000011

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

Details of your Electric Charges

Residential-R RAD - service number [REDACTED]
Electricity you used this period

Meter Number	Energy Type Use (kWh)	End Date	Start Date	Number Of Days	Total Use
[REDACTED]		Mar 17	Feb 17	29	283
		Reading 038118	Reading 037835	Multiplier 1	

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period.
End and start date kWh meter readings are provided for informational purposes only.
Please visit My Account at pepco.com to view your energy use data.

Your next bill period is scheduled to end on April 19, 2021

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 29 days, **winter rates in effect.**

Type of charge	How we calculate this charge	Amount(\$)
Distribution Services:		
Customer Charge		15.09
Energy Charge	283 kWh X \$0.0089110 per kWh	2.52
Residential Aid Discount Surcharge	283 kWh X \$0.0004770 per kWh	0.13
CNM Credit: PD SFA02	88 kWh X \$0.1206774- per kWh	10.62-
Administrative Credit	283 kWh X \$0.0003120- per kWh	0.09-
Subtotal (Set by DC PSC)		7.03
EDIT Credit 5 Year - KWH	283 kWh X \$0.0001400- per kWh	0.04-
EDIT Credit 10 Year - KWH	283 kWh X \$0.0004700- per kWh	0.13-
Energy Assistance Trust Fund	283 kWh X \$0.0002322 per kWh	0.07
Sustain Energy Trust Fund	283 kWh X \$0.0027928 per kWh	0.79
Public Space Occupancy Surcharge	283 kWh X \$0.0025200 per kWh	0.71
Delivery Tax	283 kWh X \$0.0070000 per kWh	1.98

Electric Summary

Balance from your last bill	\$535.28-
Electric Charges (Residential-R RAD) Mar 2021	\$12.59
Electric Charges (Residential-R RAD) Feb 2021	\$11.19
Electric Charges (Residential-R RAD) Jan 2021	\$13.82
Electric Charges (Residential-R RAD) Dec 2020	\$3.46
Electric Charges (Residential-R RAD) Nov 2020	\$10.28-
Electric Charges (Residential-R RAD) Oct 2020	\$18.76-
Electric Charges (Residential-R RAD) Sep 2020	\$15.15-
Electric Charges (Residential-R RAD) Aug 2020	\$0.73
Electric Charges (Residential-R RAD) Jul 2020	\$16.45
Electric Charges (Residential-R RAD) Jun 2020	\$6.00-
New electric charges	\$8.05
Total credit amount	\$527.23-

Page 2 of 15

☐ **Check here to enroll in the Direct Debit plan**

Sign and date here _____

By signing here, you authorize Pepco to electronically deduct the amount of your monthly bill from your checking account each month. The check you send with this signed authorization will be used to set up Direct Debit. You understand that we will notify you each month of the date and amount of the debit, which will be on or after the due date stated on your monthly bill. You understand that to withdraw this authorization you must call Pepco. You understand that Pepco does not charge for this service, but that your bank may have charges for this service.

Customer Service Centers

Washington DC

701 Ninth St NW

(Mon - Fri) 8:30am - 5:15pm

2300 Martin Luther King Jr Ave SE (Mon - Fri) 9:00am - 5:00pm

Maryland

201 West Gude Dr, Rockville

(Mon - Fri) 10:00am - 2:00pm

8300 Old Marlboro Pk, Forestville (Mon, Wed, Fri) 10:00am - 2:00pm

Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Subtotal (Not set by DC PSC)	3.38
RAC - Distribution	17.61–
RAC - Surcharges	0.99–
Subtotal RAC	18.60–
Total Electric Delivery Charges	8.19–

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Feb 17, 2021 to Mar 17, 2021 (29 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	253 kWh X \$0.0129400 per kWh	3.27
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.80
Energy Charge	253 kWh X \$0.0599800 per kWh	15.17
Procurement Cost Adjustment	283 kWh X \$0.0014680 per kWh	0.42
Total Electric Supply Charges		20.78
Total Electric Charges - Residential-R RAD		12.59

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]	<u>Use (kWh)</u>	<u>Feb 16</u>	<u>Jan 22</u>	<u>26</u>	<u>309</u>
		<u>Reading</u>	<u>Reading</u>	<u>Multiplier</u>	
		037835	037526	1	

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period. End and start date kWh meter readings are provided for informational purposes only. Please visit My Account at pepco.com to view your energy use data.

Delivery Charges: These charges reflect the cost of bringing electricity to you. Current charges for 26 days, **winter rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	309 kWh X \$0.0094200 per kWh	2.91
Residential Aid Discount Surcharge	309 kWh X \$0.0004770 per kWh	0.15
CNM Credit: PD SFA02	118 kWh X \$0.1207053- per kWh	14.24–

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

Administrative Credit	309 kWh X \$0.0003607- per kWh	0.11-
Subtotal (Set by DC PSC)		3.80
EDIT Credit 5 Year - KWH	309 kWh X \$0.0001400- per kWh	0.04-
EDIT Credit 10 Year - KWH	309 kWh X \$0.0004700- per kWh	0.15-
Energy Assistance Trust Fund	309 kWh X \$0.0002322 per kWh	0.07
Sustain Energy Trust Fund	309 kWh X \$0.0027928 per kWh	0.86
Public Space Occupancy Surcharge	309 kWh X \$0.0021400 per kWh	0.66
Delivery Tax	309 kWh X \$0.0070000 per kWh	2.16
Subtotal (Not set by DC PSC)		3.56
RAC - Distribution		18.00-
RAC - Surcharges		1.08-
Subtotal RAC		19.08-
Total Electric Delivery Charges		11.72-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.
The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Jan 22, 2021 to Feb 16, 2021 (26 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	279 kWh X \$0.0129400 per kWh	3.61
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.80
Energy Charge	279 kWh X \$0.0599800 per kWh	16.73
Procurement Cost Adjustment	309 kWh X \$0.0020922 per kWh	0.65
Total Electric Supply Charges		22.91
Total Electric Charges - Residential-R RAD		11.19

Residential-R RAD - service number [REDACTED]
Electricity you used this period

<u>Meter Number</u>	<u>Energy Type</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]	<u>Use (kWh)</u>	<u>Jan 21</u>	<u>Dec 18</u>	<u>35</u>	<u>394</u>
		<u>Reading</u>	<u>Reading</u>	<u>Multiplier</u>	
		037526	037132	1	

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period.
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Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Delivery Charges: These charges reflect the cost of bringing electricity to you.
 Current charges for 35 days, **winter rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	394 kWh X \$0.0097610 per kWh	3.84
Residential Aid Discount Surcharge	394 kWh X \$0.0004770 per kWh	0.19
CNM Credit: PD SFA02	153 kWh X \$0.1215013- per kWh	18.59-
Administrative Credit	394 kWh X \$0.0003960- per kWh	0.16-
Subtotal (Set by DC PSC)		0.37
EDIT Credit 5 Year - KWH	394 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 10 Year - KWH	394 kWh X \$0.0004700- per kWh	0.19-
Energy Assistance Trust Fund	394 kWh X \$0.0002322 per kWh	0.09
Sustain Energy Trust Fund	394 kWh X \$0.0027928 per kWh	1.10
Public Space Occupancy Surcharge	394 kWh X \$0.0021400 per kWh	0.84
Delivery Tax	394 kWh X \$0.0070000 per kWh	2.76
Subtotal (Not set by DC PSC)		4.54
RAC - Distribution		18.93-
RAC - Surcharges		1.38-
Subtotal RAC		20.31-
Total Electric Delivery Charges		15.40-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you.
 You can compare this part of your bill to offers from competitive suppliers.
 Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Dec 18, 2020 to Jan 21, 2021 (35 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	364 kWh X \$0.0129400 per kWh	4.71
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.80
Energy Charge	364 kWh X \$0.0599800 per kWh	21.83
Procurement Cost Adjustment	394 kWh X \$0.0019402 per kWh	0.76
Total Electric Supply Charges		29.22
Total Electric Charges - Residential-R RAD		13.82

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type Use (kWh)</u>	<u>End Date Dec 17 Reading 037132</u>	<u>Start Date Nov 18 Reading 036835</u>	<u>Number Of Days 30 Multiplier 1</u>	<u>Total Use 297</u>
[REDACTED]					

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Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 30 days, **winter rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	297 kWh X \$0.0092250 per kWh	2.74
Residential Aid Discount Surcharge	297 kWh X \$0.0004770 per kWh	0.14
CNM Credit: PD SFA02	172 kWh X \$0.1216905- per kWh	20.93-
Administrative Credit	297 kWh X \$0.0004121- per kWh	0.12-
Subtotal (Set by DC PSC)		3.08-
EDIT Credit 5 Year - KWH	297 kWh X \$0.0001400- per kWh	0.04-
EDIT Credit 10 Year - KWH	297 kWh X \$0.0004700- per kWh	0.14-
Energy Assistance Trust Fund	297 kWh X \$0.0002322 per kWh	0.07
Sustain Energy Trust Fund	297 kWh X \$0.0027928 per kWh	0.83
Public Space Occupancy Surcharge	297 kWh X \$0.0021400 per kWh	0.64
Delivery Tax	297 kWh X \$0.0070000 per kWh	2.08
Subtotal (Not set by DC PSC)		3.44
RAC - Distribution		17.83-
RAC - Surcharges		1.04-
Subtotal RAC		18.87-
Total Electric Delivery Charges		18.51-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Supply Charges: These charges reflect the cost of producing electricity for you.
 You can compare this part of your bill to offers from competitive suppliers.
 Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Nov 18, 2020 to Dec 17, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	267 kWh X \$0.0129400 per kWh	3.45
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.80
Energy Charge	267 kWh X \$0.0599800 per kWh	16.01
Procurement Cost Adjustment	297 kWh X \$0.0020009 per kWh	0.59
Total Electric Supply Charges		21.97
Total Electric Charges - Residential-R RAD		3.46

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type Use (kWh)</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]		Nov 17 Reading 036835	Oct 20 Reading 036556	29 Multiplier 1	280

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Delivery Charges: These charges reflect the cost of bringing electricity to you.
 Current charges for 29 days, **winter rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	280 kWh X \$0.0079120 per kWh	2.22
Residential Aid Discount Surcharge	280 kWh X \$0.0004770 per kWh	0.13
CNM Credit: PD SFA02	269 kWh X \$0.1216935- per kWh	32.73-
Administrative Credit	280 kWh X \$0.0004778- per kWh	0.13-
Subtotal (Set by DC PSC)		15.42-
EDIT Credit 5 Year - KWH	280 kWh X \$0.0001400- per kWh	0.04-
EDIT Credit 10 Year - KWH	280 kWh X \$0.0004700- per kWh	0.13-
Energy Assistance Trust Fund	280 kWh X \$0.0002322 per kWh	0.07
Sustain Energy Trust Fund	280 kWh X \$0.0027928 per kWh	0.78
Public Space Occupancy Surcharge	280 kWh X \$0.0021400 per kWh	0.60
Delivery Tax	280 kWh X \$0.0070000 per kWh	1.96
Subtotal (Not set by DC PSC)		3.24
RAC - Distribution		17.31-
RAC - Surcharges		0.98-

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

Subtotal RAC 18.29–
Total Electric Delivery Charges 30.47–

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.
The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kWh.

Billing Period: Oct 20, 2020 to Nov 17, 2020 (29 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	250 kWh X \$0.0112000 per kWh	2.80
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.80
Energy Charge	250 kWh X \$0.0599800 per kWh	15.00
Procurement Cost Adjustment	280 kWh X \$0.0016648 per kWh	0.47
Total Electric Supply Charges		20.19
Total Electric Charges - Residential-R RAD		10.28–

Residential-R RAD - service number [REDACTED]
Electricity you used this period

<u>Meter Number</u>	<u>Energy Type</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]	Use (kWh)	<u>Oct 19 Reading</u>	<u>Sep 19 Reading</u>	<u>31</u>	<u>333</u>
		036556	036223	Multiplier 1	

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Delivery Charges: These charges reflect the cost of bringing electricity to you. Current charges for 31 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	333 kWh X \$0.0083060 per kWh	2.76
Residential Aid Discount Surcharge	333 kWh X \$0.0004770 per kWh	0.16
CNM Credit: PD SFA02	353 kWh X \$0.1257488- per kWh	44.39–
Administrative Credit	333 kWh X \$0.0005235- per kWh	0.17–
Subtotal (Set by DC PSC)		26.55–
EDIT Credit 5 Year - KWH	333 kWh X \$0.0001400- per kWh	0.05–
EDIT Credit 10 Year - KWH	333 kWh X \$0.0004700- per kWh	0.16–

Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Energy Assistance Trust Fund	333 kWh X \$0.0002322 per kWh	0.08
Sustain Energy Trust Fund	333 kWh X \$0.0028529 per kWh	0.95
Public Space Occupancy Surcharge	333 kWh X \$0.0021400 per kWh	0.71
Delivery Tax	333 kWh X \$0.0070000 per kWh	2.33
Subtotal (Not set by DC PSC)		3.86
RAC - Distribution		17.85–
RAC - Surcharges		1.19–
Subtotal RAC		19.04–
Total Electric Delivery Charges		41.73–

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.
The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Sep 19, 2020 to Oct 19, 2020 (31 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	303 kWh X \$0.0079000 per kWh	2.39
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	303 kWh X \$0.0572200 per kWh	17.34
Procurement Cost Adjustment	333 kWh X \$0.0041893 per kWh	1.40
Total Electric Supply Charges		22.97
Total Electric Charges - Residential-R RAD		18.76–

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type Use (kWh)</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]		<u>Sep 18 Reading</u> 036223	<u>Aug 20 Reading</u> 035687	<u>30 Multiplier</u> 1	536

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Delivery Charges: These charges reflect the cost of bringing electricity to you. Current charges for 30 days, **summer rates in effect.**

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	First 400 kWh X \$0.0063890 per kWh	2.56
Energy Charge	Last 136 kWh X \$0.0212190 per kWh	2.88
Residential Aid Discount		
Surcharge	536 kWh X \$0.0004770 per kWh	0.26
CNM Credit: PD SFA02	449 kWh X \$0.1259602- per kWh	56.55-
Administrative Credit	536 kWh X \$0.0003897- per kWh	0.21-
Subtotal (Set by DC PSC)		35.97-
EDIT Credit 5 Year - KWH	First 400 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 5 Year - KWH	Last 136 kWh X \$0.0003900- per kWh	0.05-
EDIT Credit 10 Year - KWH	First 400 kWh X \$0.0004700- per kWh	0.19-
EDIT Credit 10 Year - KWH	Last 136 kWh X \$0.0013300- per kWh	0.18-
Energy Assistance Trust		
Fund	536 kWh X \$0.0002322 per kWh	0.12
Sustain Energy Trust Fund	536 kWh X \$0.0029016 per kWh	1.56
Public Space Occupancy		
Surcharge	536 kWh X \$0.0021400 per kWh	1.15
Delivery Tax	536 kWh X \$0.0070000 per kWh	3.75
Subtotal (Not set by DC PSC)		6.10
RAC - Distribution		20.53-
RAC - Surcharges		1.94-
Subtotal RAC		22.47-
Total Electric Delivery Charges		52.34-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Aug 20, 2020 to Sep 18, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	Next 370 kWh X \$0.0079000 per kWh	2.92
Energy Charge	Last 136 kWh X \$0.0079000 per kWh	1.07
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	Next 370 kWh X \$0.0572200 per kWh	21.17
Energy Charge	Last 136 kWh X \$0.0572200 per kWh	7.78
Procurement Cost Adjustment	536 kWh X \$0.0044946 per kWh	2.41
Total Electric Supply Charges		37.19
Total Electric Charges - Residential-R RAD		15.15-

Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type Use (kWh)</u>	<u>End Date Aug 19 Reading 035687</u>	<u>Start Date Jul 21 Reading 034999</u>	<u>Number Of Days 30 Multiplier 1</u>	<u>Total Use 688</u>
[REDACTED]					

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Delivery Charges: These charges reflect the cost of bringing electricity to you.
 Current charges for 30 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	First 400 kWh X \$0.0076800 per kWh	3.07
Energy Charge	Last 288 kWh X \$0.0225100 per kWh	6.49
Residential Aid Discount Surcharge	688 kWh X \$0.0004770 per kWh	0.33
CNM Credit: PD SFA02	417 kWh X \$0.1255267- per kWh	52.35-
Administrative Credit	688 kWh X \$0.0004015- per kWh	0.28-
Subtotal (Set by DC PSC)		27.65-
EDIT Credit 5 Year - KWH	First 400 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 5 Year - KWH	Last 288 kWh X \$0.0003900- per kWh	0.11-
EDIT Credit 10 Year - KWH	First 400 kWh X \$0.0004700- per kWh	0.19-
EDIT Credit 10 Year - KWH	Last 288 kWh X \$0.0013300- per kWh	0.38-
Energy Assistance Trust Fund	688 kWh X \$0.0002322 per kWh	0.16
Sustain Energy Trust Fund	688 kWh X \$0.0029016 per kWh	2.00
Public Space Occupancy Surcharge	688 kWh X \$0.0021400 per kWh	1.47
Delivery Tax	688 kWh X \$0.0070000 per kWh	4.82
Subtotal (Not set by DC PSC)		7.71
RAC - Distribution		24.65-
RAC - Surcharges		2.49-
Subtotal RAC		27.14-
Total Electric Delivery Charges		47.08-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

Supply Charges: These charges reflect the cost of producing electricity for you.
You can compare this part of your bill to offers from competitive suppliers.
Based on billed use, your average annual price to compare is 7.03 cents per kWh.

Billing Period: Jul 21, 2020 to Aug 19, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	Next 370 kWh X \$0.0079000 per kWh	2.92
Energy Charge	Last 288 kWh X \$0.0079000 per kWh	2.28
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	Next 370 kWh X \$0.0572200 per kWh	21.17
Energy Charge	Last 288 kWh X \$0.0572200 per kWh	16.48
Procurement Cost Adjustment	688 kWh X \$0.0045355 per kWh	3.12
Total Electric Supply Charges		47.81
Total Electric Charges - Residential-R RAD		0.73

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type Use (kWh)</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]		<u>Jul 20</u>	<u>Jun 18</u>	<u>33</u>	<u>832</u>
		<u>Reading</u>	<u>Reading</u>	<u>Multiplier</u>	
		034999	034167	1	

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Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 33 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	First 400 kWh X \$0.0093190 per kWh	3.73
Energy Charge	Last 432 kWh X \$0.0241490 per kWh	10.43
Residential Aid Discount Surcharge	832 kWh X \$0.0006340 per kWh	0.53
CNM Credit: PD SFA02	380 kWh X \$0.1243938- per kWh	47.27-
Administrative Credit	832 kWh X \$0.0003761- per kWh	0.31-
Subtotal (Set by DC PSC)		17.80-
EDIT Credit 5 Year - KWH	First 400 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 5 Year - KWH	Last 432 kWh X \$0.0003900- per kWh	0.17-
EDIT Credit 10 Year - KWH	First 400 kWh X \$0.0004700- per kWh	0.19-
EDIT Credit 10 Year - KWH	Last 432 kWh X \$0.0013300- per kWh	0.57-
Energy Assistance Trust Fund	832 kWh X \$0.0002322 per kWh	0.19
Sustain Energy Trust Fund	832 kWh X \$0.0029016 per kWh	2.41

Your electric bill for the period
May 19, 2020 to March 17, 2021

Account number: [REDACTED]

Public Space Occupancy Surchage	832 kWh X \$0.0021400 per kWh	1.78
Delivery Tax	832 kWh X \$0.0070000 per kWh	5.82
Subtotal (Not set by DC PSC)		9.21
RAC - Distribution		29.25-
RAC - Surcharges		3.13-
Subtotal RAC		32.38-
Total Electric Delivery Charges		40.97-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surchage, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Jun 18, 2020 to Jul 20, 2020 (33 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	Next 370 kWh X \$0.0079000 per kWh	2.92
Energy Charge	Last 432 kWh X \$0.0079000 per kWh	3.41
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	Next 370 kWh X \$0.0572200 per kWh	21.17
Energy Charge	Last 432 kWh X \$0.0572200 per kWh	24.72
Procurement Cost Adjustment	832 kWh X \$0.0040351 per kWh	3.36
Total Electric Supply Charges		57.42
Total Electric Charges - Residential-R RAD		16.45

Residential-R RAD - service number [REDACTED]

Electricity you used this period

<u>Meter Number</u>	<u>Energy Type</u>	<u>End Date</u>	<u>Start Date</u>	<u>Number Of Days</u>	<u>Total Use</u>
[REDACTED]	<u>Use (kWh)</u>	<u>Jun 17</u>	<u>May 19</u>	<u>30</u>	<u>438</u>
		<u>Reading</u>	<u>Reading</u>	<u>Multiplier</u>	
		034167	033728	1	

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period. End and start date kWh meter readings are provided for informational purposes only. Please visit My Account at pepco.com to view your energy use data.

Delivery Charges: These charges reflect the cost of bringing electricity to you. Current charges for 30 days, **summer rates in effect.**

Account number: [REDACTED]

Your electric bill for the period
May 19, 2020 to March 17, 2021

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09
Energy Charge	First 400 kWh X \$0.0093700 per kWh	3.75
Energy Charge	Last 38 kWh X \$0.0242000 per kWh	0.92
Residential Aid Discount		
Surcharge	438 kWh X \$0.0006340 per kWh	0.28
CNM Credit: PD SFA02	320 kWh X \$0.1258492- per kWh	40.27-
Administrative Credit	438 kWh X \$0.0008157- per kWh	0.36-
Subtotal (Set by DC PSC)		20.59-
EDIT Credit 5 Year - KWH	First 400 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 5 Year - KWH	Last 38 kWh X \$0.0003900- per kWh	0.01-
EDIT Credit 10 Year - KWH	First 400 kWh X \$0.0004700- per kWh	0.19-
EDIT Credit 10 Year - KWH	Last 38 kWh X \$0.0013300- per kWh	0.05-
Energy Assistance Trust Fund	438 kWh X \$0.0002322 per kWh	0.10
Sustain Energy Trust Fund	438 kWh X \$0.0029016 per kWh	1.27
Public Space Occupancy Surcharge	438 kWh X \$0.0021400 per kWh	0.94
Delivery Tax	438 kWh X \$0.0070000 per kWh	3.07
Subtotal (Not set by DC PSC)		5.07
RAC - Distribution		19.76-
RAC - Surcharges		1.65-
Subtotal RAC		21.41-
Total Electric Delivery Charges		36.93-

The Residential Aid Credit (RAC) - Distribution reduces your bill by the total amount of the Customer Charge and the Energy Charges.

The RAC - Surcharges reduces your bill by the total amount of the Residential Aid Discount Surcharge, Energy Assistance Trust Fund, and Sustain Energy Trust Fund Charges.

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: May 19, 2020 to Jun 17, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	Next 370 kWh X \$0.0079000 per kWh	2.92
Energy Charge	Last 38 kWh X \$0.0079000 per kWh	0.30
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	Next 370 kWh X \$0.0584865 per kWh	21.64
Energy Charge	Last 38 kWh X \$0.0571053 per kWh	2.17
Procurement Cost Adjustment	438 kWh X \$0.0047043 per kWh	2.06
Total Electric Supply Charges		30.93
Total Electric Charges - Residential-R RAD		6.00-

Account number: [REDACTED]

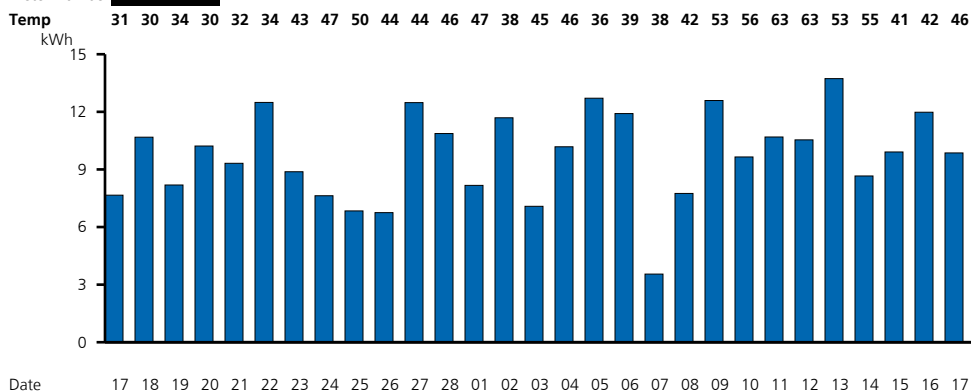
Your electric bill for the period
May 19, 2020 to March 17, 2021

Energy Usage History

	Mar 20	Apr 20	May 20	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21
Temp	48°	55°	58°	72°	81°	80°	76°	63°	58°	46°	40°	35°	44°
Days	29	30	31	30	33	30	30	31	29	30	35	26	29
kWh	230	240	242	438	832	688	536	333	280	297	394	309	283

Your daily electricity use for this bill period. Visit My Account at pepco.com to see your hourly electricity use.
For Current Bill Month

Meter Number [REDACTED]



Follow us on Twitter at twitter.com/PepcoConnect. Like us on Facebook at facebook.com/PepcoConnect.

You can help a Pepco customer in need of assistance with their energy bills. Simply pay exactly \$1.00 over your Pepco bill amount and that dollar will be contributed to the Good Neighbor Energy Fund administered by a local 501(c)3 non-profit organization. Amounts over \$1.00 will not be identified as a contribution and will result in a credit to your account. Pepco will match each donation by contributing a dollar to the fund, up to \$100,000.

Aggregation	Site Name	Pepco Meter Number
SFA01	5112 Connecticut Ave NW	TED387390770
SFA01	AHD - Royal Courts 1	KZD381349456
SFA01	AHD - Savannah Street 2	X8D346212059
SFA01	AHD 1	KZD383312629
SFA01	Bob Siegel	KZD383312621
SFA01	Bob Siegel Canopy	KZD383312612
SFA01	Fort Chaplin - North Lot 1	KZD381349822
SFA01	Fort Chaplin - North Lot 10	TED350704123
SFA01	Fort Chaplin - North Lot 12	TED383925764
SFA01	Fort Chaplin - North Lot 13	KZD383312643
SFA01	Fort Chaplin - North Lot 2	KZD383312637
SFA01	Fort Chaplin - North Lot 3	KZD383312724
SFA01	Fort Chaplin - North Lot 4	KZD341207683
SFA01	Fort Chaplin - North Lot 5	KZD381349443
SFA01	Fort Chaplin - North Lot 8	KZD383312634
SFA01	Fort Chaplin - North Lot 9	KZD383312620
SFA01	Fort Chaplin - South Lot 1	KZD383312658
SFA01	Fort Chaplin - South Lot 2	KZD383312635
SFA01	Fort Chaplin - South Lot 3	KZD383312632
SFA01	Fort Chaplin - South Lot 4	KZD383312614
SFA01	Fort Chaplin - South Lot 5	KZD381349841
SFA01	Greg Selfridge 1	NXA152632960
SFA01	Greg Selfridge 2	TED383925796
SFA01	Horning Brothers 1	TED385387479
SFA01	Horning Brothers 10	TED350889212
SFA01	Horning Brothers 11	TED387390787
SFA01	Horning Brothers 12	NXA113574535
SFA01	Horning Brothers 14	TED363533646
SFA01	Horning Brothers 15	KZD383312660
SFA01	Horning Brothers 16	TED350888348
SFA01	Horning Brothers 17	TED383925696
SFA01	Horning Brothers 18	TED383925763
SFA01	Horning Brothers 19	TED346211074
SFA01	Horning Brothers 20	TED350484816
SFA01	Horning Brothers 21	TED385387478
SFA01	Horning Brothers 22	NXA116009151
SFA01	Horning Brothers 23	NXA116012344
SFA01	Horning Brothers 4	TED351936183
SFA01	Horning Brothers 5	TED383925758
SFA01	Horning Brothers 6	TED350705676

Aggregation	Site Name	Pepco Meter Number
SFA01	Horning Brothers 7	1ND355100460
SFA01	Horning Brothers 8	TED350703771
SFA01	Horning Brothers 9	KZD350747208
SFA01	NOVO Properties	NXA114371201
SFA01	Progressive National Baptist Convention	KZD383312636
SFA01	Townhomes on Capitol Hill - North	TED353378822
SFA01	Townhomes on Capitol Hill - South	KZD383312661
SFA02	2nd St NE	X8D385390385 / KZD383312624
SFA02	Savoy Court	KZD381349812
SFA03	5054 Astor Place	TED363533574
SFA03	5215 B St	NXA152633414
SFA03	5509 Nannie Helen Ave	1ND384711810
SFA03	5615 Nannie Helen Ave	1ND384711811
SFA03	Benning Building 10	TED383925749
SFA03	Benning Building 11	TED383925778
SFA03	Benning Building 2	TED353378908
SFA03	Benning Building 3	TED383925779
SFA03	Benning Building 4	TED387390783
SFA03	Benning Building 5	TED350217635
SFA03	Benning Building 6	TED385387471
SFA03	Benning Building 7	TED385387469
SFA03	Benning Building 8	TED383925621
SFA03	Benning Building 9	TED351936180
SFA03	Cole Gardens Building 1	KZD383312615
SFA03	Cole Gardens Building 2	See: 2800 Jasper Rd SE
SFA03	Cole Gardens Building 3	See: 2800 Jasper Rd SE
SFA03	Woodmont Building 1	X8D383312976
SFA03	Woodmont Building 2	NXA153245296
SFA03	Woodmont Building 3	X8D383312906
SFA03	Woodmont Building 4	NXA153245294
SFA03	Woodmont Building 6	X8D383312904
SFA04	Capital Area Food Bank	KZD381349435
SFA04	Demers Real Estate 1	KZD383312583
SFA04	Demers Real Estate 2	KZD381349810
SFA04	Demers Real Estate 3	KZD383312628
SFA04	Demers Real Estate 4	X8D383312909
SFA04	Demers Real Estate 5	KZD383312639
SFA04	Demers Real Estate 6	KZD383312630
SFA04	Potomac Place Condos 1	KZD381349454
SFA04	Potomac Place Condos 2	KZD383312553

Aggregation	Site Name	Pepco Meter Number
SFA04	Thompson Properties 1	NXA148456756
SFA04	Thompson Properties 2	NXA155725876
SFA04	Thompson Properties 3	KZD350368490
SFA05	Children's Hospital	KZD383312605
SFA05	Glover Park	KZD383312631
SFA05	St. Luke's	X8D385390354
SFA06	Oxon Run	KZD387056218
SFA07	Horning Girard 1	TED385387316
SFA07	Horning Girard 2	TED352094148
SFA07	Paradise R15S	NXA114402644
SFA07	Paradise R14S	NXA111227933
SFA07	Paradise R13S	NXA116008712
SFA07	Paradise R12S	NXA111228349
SFA07	Paradise R11S	NXA112125253
SFA07	Paradise R10S	NXA114427485
SFA07	Paradise R9S	NXA112126912
SFA07	Paradise R8S	NXA112125252
SFA07	Paradise R7S	NXA116036868
SFA07	Paradise R6S	NXA112129638
SFA07	Paradise R5S	NXA116009334
SFA07	Paradise R4S	NXA111228293
SFA07	Paradise R3S	NXA114423594
SFA07	Paradise R2S	unknown
SFA07	Paradise R1S	NXA114440884
SFA07	Paradise R13N	NXA111190264
SFA07	Paradise R14N	NXA114402641
SFA07	Paradise R15N	NXA116009038
SFA07	Paradise R1N	NXA116040120
SFA07	Paradise R2N	NXA114442211
SFA07	Paradise R3N	NXA112081651
SFA07	Paradise R4N	NXA111194223
SFA07	Paradise R5N	NXA111185550
SFA07	Paradise R6N	NXA112133905
SFA07	Hughes Memorial	KZD383312623
SFA08	EQ Flats	KZD350218556
SFA08	EQ Flats Carport	KZD350218556
SFA08	Fairfax Village 2	TED385387388
SFA08	Fairfax Village 3-1	TED387390242
SFA08	Fairfax Village 3-2	TED385387319
SFA08	Fairfax Village 5-1	TED385387498

Aggregation	Site Name	Pepco Meter Number
SFA08	Fairfax Village 5-2	X8D385390442
SFA08	Fairfax Village 5-4	TED387390241
SFA08	Fairfax Village 5-6	KZD383312671
SFA08	Fairfax Village 5 Carport	TED387390241
SFA08	Fairfax Village 7-1	TED385387317
SFA08	Fairfax Village 7-2	TED385387318
SFA08	Hunter Place 1	TED385387477
SFA08	Hunter Place 2	NXA157798323
SFA08	Fairfax Commons 1	KZD383312599
SFA08	Abrams Hall 1	KZD387055883
SFA09	Ridgecrest 1	KZD387055908
SFA10	St. James Co-op 1	KZD350368595
SFA10	Firehouse 27	KZD346211543
SFA10	Harrison Condos	TED352253489
SFA11	Rhode Island Row 1	KZD387055945
SFA11	Rhode Island Row 2	KZD383312703
SFA13	Walter Washington Community Center	TED387390410
SFA13	Bethune House	TED387390580
SFA14	Northbrook I	KZD383312582
SFA14	Crescent Park Village 1	NYA164006061
SFA14	Crescent Park Village 2	NYA164006059
SFA14	Crescent Park Village 3	TED387390723
SFA14	Crescent Park Village 4	TED387390607
SFA14	Crescent Park Village 5	NXA116039998
SFA14	Crescent Park Village 6	NXA155726062
SFA14	Washington Tennis	KZD389648244
SFA14	Takoma Park SDA	unknown
SFA14	1320 Nicholson	TED387390207
SFA14	Celestial Church	unknown
SFA14	Peter Mellen	KZD381349258
SFA15	Worthington Woods I	X8D351057108
SFA15	Worthington Woods II	X8D351046811
SFA16	Pepco - Benning Road	KZD381349415
SFA16	Savannah Apartments 1	TED387390605
SFA16	Savannah Apartments 2	KZD381349401
SFA17	Benning Park Apartments 1	KZD381349892
SFA17	Benning Park Apartments 2	KZD389648253
SFA17	Benning Park Apartments 3	KZD384528266
SFA17	Pannell House	NXA112128832
SFA18	Fairfax Village 1	KZD384528398

Aggregation	Site Name	Pepco Meter Number
SFA18	Fairfax Village 6-1	KZD381349493
SFA18	Fairfax Village 6-2	KZD381349831
SFA18	Fairfax Village 8	KZD350747231
SFA18	Gateway Commons	KZD390966058
SFA18	Fairfax Commons Hill	KZD363533483

An Exelon Company

Your electric bill - Aug 2020

for the period **July 23, 2020 to August 21, 2020**

WAYS TO SAVE: FIND TIPS AND PROGRAMS THAT HELP

Learn more at pepco.com/WaysToSave

DC GOVT DEPARTMENT OF ENERGY &

Account number:

Your service address:

Bill Issue date: Aug 25, 2020

Summary of your charges

Balance from your last bill	\$37.88
Balance forward as of Aug 25, 2020	\$37.88
New electric distribution charges - Pepco	\$51.85
New electric supply charges - SOS Provider	\$144.88
Pepco	
Total Credit Amount	\$234.61

Visit pepco.com/dctariffs and click "DC Terms and Conditions" for information on how payments are applied to balances from Pepco and any competitive supplier.

Your smart electric meter is read wirelessly. Visit My Account at pepco.com to view your daily and hourly energy usage.

If you are moving or discontinuing service, please contact Pepco at least three days in advance.

Information regarding rate schedules and how to verify the accuracy of your bill will be mailed upon request.

Follow us on Twitter at twitter.com/PepcoConnect. Like us on Facebook at facebook.com/PepcoConnect.

How to contact us

Customer Service (Mon-Fri, 7am - 8 pm)

202-833-7500

TTY English

1-800-643-3768

TTY Spanish

1-800-546-7111

¿Problemas con la factura?

202-833-7500

Electric emergencies & outages (24 hours)

1-877-737-2602

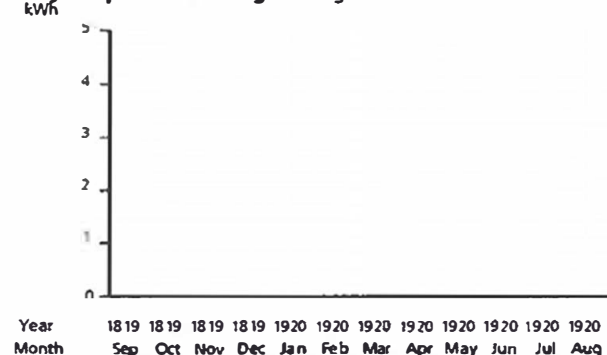
Visit pepco.com for service, billing and correspondence information.

Pepco is regulated by - DC Public Service Commission, dcpsc.org
1325 G St NW, Suite 800, Washington DC 20005, 202-626-5100

**Consumer Advocate - Office of People's Counsel, opc-dc.gov
1133 Fifteenth St NW, Washington DC 20005, 202-727-3071**

Your monthly Electricity use in kWh

Daily temperature averages: Aug 2020: 80° F



Please tear on the dotted line below. Invoice Number: [REDACTED] **Page 1 of 4**

Account number

No Payment Due

1000002 01 AV 0.386 **AUTO T1 0 4205 20002-795705 -C02-P00002 Y1

2DR02345



DC GOVT DEPARTMENT OF ENERGY & ENVIRON

1200 1ST STREET NE FL 5
WASHINGTON DC 20002-7957



**Amount
Paid:**

\$.

PO BOX 13608
PHILADELPHIA PA 19101

[illegible]

**DC GOVT DEPARTMENT OF ENERGY &
ENVIRONME**

Account number: [REDACTED]

Your electric bill for the period
July 23, 2020 to August 21, 2020

Details of your Electric Charges

Residential-R - service number [REDACTED]
Electricity you used this period

Meter Number Energy Type	Current Reading	Previous Reading	Difference	Multiplier	Total Use
KZD383312628	Aug 21	Jul 23			
Use (kWh)	000000 (actual)	000000 (actual)	0	80	0
Excess Gen (kWh)	000026 (actual)	000000 (actual)	26	80	2080

Your next meter reading is scheduled for September 22, 2020

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 30 days, summer rates in effect.

Type of charge	How we calculate this charge	Amount(\$)
Distribution Services:		
Customer Charge		15.09
Exelon Base Rate Credit		1.37-
Energy Charge	First 400- kWh X \$0.0080000 per kWh	3.20-
Energy Charge	Last 1680- kWh X \$0.0228300 per kWh	38.35-
Administrative Credit	2080- kWh X \$0.0004015- per kWh	0.84
Subtotal (Set by DC PSC)		26.99-
Sales Tax	at 6%	10.12-
Subtotal (Not set by DC PSC)		10.12-
Total Electric Delivery Charges		37.11-

Customer Service Centers

Washington DC	Maryland
701 Ninth St NW	201 West Gude Dr, Rockville
2300 Martin Luther King Jr Ave SE	8300 Old Marlboro Pk, Forestville
(Mon - Fri) 8:30am - 5:15pm	(Mon - Fri) 10:00am - 2:00pm
(Mon - Fri) 9:00am - 5:00pm	(Mon, Wed, Fri) 10:00am - 2:00pm

Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

DC GOVT DEPARTMENT OF ENERGY &
ENVIRONME

Account number: [REDACTED]

Your electric bill for the period
July 23, 2020 to August 21, 2020

Supply Charges: These charges reflect the cost of producing electricity for you.
You can compare this part of your bill to offers from competitive suppliers.
Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Jul 23, 2020 to Aug 21, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	2080- kWh X \$0.0079000 per kWh	16.43-
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72
Energy Charge	2080- kWh X \$0.0572200 per kWh	119.02-
Procurement Cost Adjustment	2080- kWh X \$0.0045355 per kWh	9.43-
Total Electric Supply Charges		143.04-
Total Electric Charges - Residential-R		180.15-

Residential-R - service number [REDACTED]

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 30 days, **summer rates in effect.**

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Distribution Services:		
Customer Charge		15.09-
Exelon Base Rate Credit		1.37
Subtotal (Set by DC PSC)		13.72-
Sales Tax	at 6%	1.02-
Subtotal (Not set by DC PSC)		1.02-
Total Electric Delivery Charges		14.74-

Supply Charges: These charges reflect the cost of producing electricity for you.
You can compare this part of your bill to offers from competitive suppliers.
Based on billed use, your average annual price to compare is 7.03 cents per kwh.

Billing Period: Jul 23, 2020 to Aug 21, 2020 (30 days)

<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12-
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.72-
Total Electric Supply Charges		1.84-
Total Electric Charges - Residential-R		16.58-

DC GOVT DEPARTMENT OF ENERGY &
ENVIRONME

Account number: [REDACTED]

Your electric bill for the period
July 23, 2020 to August 21, 2020

Energy Usage History

	Aug 19	Sep 19	Oct 19	Nov 19	Dec 19	Jan 20	Feb 20	Mar 20	Apr 20	May 20	Jun 20	Jul 20	Aug 20
Temp	79°	76°	64°	46°	42°	42°	44°	53°	55°	63°	75°	82°	80°
Days	31	30	31	30	31	31	29	31	30	31	22	33	30
kWh	0	0	0	0	0	0	0	0	0	0	0	0	-2080



An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

Exhibit A-4
Page 1 of 1
Public Version

DC GOV'T DEPARTMENT OF ENERGY & ENV
1200 1ST ST NE
WASHINGTON, DC 20002-3361

1266 0509-4-4-MAAD
PAGE: 1



PAYMENT SUMMARY

VENDOR NO: 50024903309
VOUCHER NO: 0000026894

VOUCHER DATE: 01/19/22

REF. DOC.	REFERENCE NUMBER	REF. DATE	DOCUMENT AMOUNT	DISCOUNT/ADJ AMOUNT	NET AMOUNT
INVOICE	492000156443	01/19/22	27,104.71	0.00	27,104.71
		TOTALS:	27,104.71	0.00	27,104.71

(Detach Here)



An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

62-4/311

CHECK DATE
01/19/2022

CHECK NUMBER
0000026894

PAY...TWENTY SEVEN THOUSAND ONE HUNDRED FOUR DOLLARS 71 CENTS

VALID FOR 365 DAYS

TO
THE
ORDER
OF:

DC GOV'T DEPARTMENT OF ENERGY & ENV
1200 1ST ST NE
WASHINGTON, DC 20002-3361

\$****27,104.71

THE BANK OF NEW YORK MELLON
PHILADELPHIA, PA



Your electric bill - Jun 2021
for the period May 25, 2021 to June 23, 2021

Exhibit A-5
Public Version

WAYS TO SAVE: FIND TIPS AND PROGRAMS THAT HELP

Learn more at pepco.com/WaysToSave

DC GOVT DEPARTMENT OF ENERGY &

Account number: [REDACTED]
Your service address: [REDACTED]
WASHINGTON DC [REDACTED]
Bill Issue date: Jun 25, 2021

Summary of your charges

Balance from your last bill	\$205.72
Balance forward as of Jun 25, 2021	\$205.72
New electric distribution charges - Pepco	\$2.13
New electric supply charges - SOS Provider	\$13.28
Pepco	
Total amount due by Jul 16, 2021	\$221.13

After Jul 16, 2021, a Late Payment Charge of \$3.24 will be added, increasing the amount due to \$224.37.

A past due amount of \$205.72 remained on your account at the time your bill was prepared. If payment has been made, please disregard this notice. For bill payment options, visit www.pepco.com.

Visit pepco.com/dctariffs and click "DC Terms and Conditions" for information on how payments are applied to balances from Pepco and any competitive supplier.

Your smart electric meter is read wirelessly. Visit My Account at pepco.com to view your daily and hourly energy usage.

If you are moving or discontinuing service, please contact Pepco at least three days in advance.

How to contact us

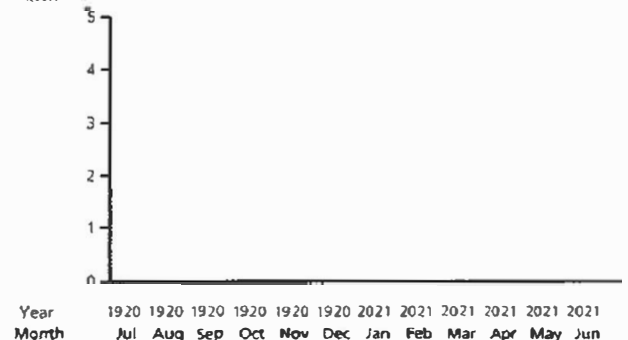
Customer Service (Mon-Fri, 7am - 8 pm) **202-833-7500**
TTY English **1-800-643-3768**
TTY Spanish **1-800-546-7111**
¿Problemas con la factura? **202-833-7500**
Electric emergencies & outages (24 hours) **1-877-737-2662**
Visit pepco.com for service, billing and correspondence information.

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1325 G St NW, Suite 800, Washington DC 20005, 202-626-5100

Consumer Advocate - Office of People's Counsel, opc-dc.gov
1133 Fifteenth St NW, Washington DC 20005, 202-727-3071

Your monthly Electricity use in kWh

Daily temperature averages: Jun 2020: 75° F Jun 2021: 73° F



Information regarding rate schedules and how to verify the accuracy of your bill will be mailed upon request.

Additional messages may be on the last page of your bill.

Please tear on the dotted line below. Invoice Number: [REDACTED] Page 1 of 4

Return this coupon with your payment
made payable to Pepco

Account number [REDACTED]
Total amount due by Jul 16, 2021 **\$221.13**
Total amount due after Jul 16, 2021 **\$224.37**

1002185 01 AV 0.395 **AUTO T7 0 4152 20002-795705 -C02-P02187-I12

2DR00470



DC GOVT DEPARTMENT OF ENERGY & ENVIRON

1200 1ST STREET NE FL 5
WASHINGTON DC 20002-7957

Amount Paid: \$ [REDACTED]

PO BOX 13608
PHILADELPHIA PA 19101



700001500232021820000000000205720000000015410000000221130013

DC GOVT DEPARTMENT OF ENERGY &
ENVIRONMENT

Account number: [REDACTED]

Exhibit A-5
Public Version

Your electric bill for the period
May 25, 2021 to June 23, 2021

Details of your Electric Charges

Residential-R - service number [REDACTED]

Electricity you used this period

Meter Number	Energy Type	End Date	Start Date	Number Of Days	Total Use
KZD350747208	Use (kWh)	Jun 23	May 25	30	180
		Reading 000021	Reading 000020	Multiplier 160	

Meter Number	Energy Type	End Date	Start Date	Number Of Days	Total Use
KZD350747208	Excess Gen (kWh)	Jun 23	May 25	30	36560
		Reading 002244	Reading 002015	Multiplier 160	

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period.
End and start date kWh meter readings are provided for informational purposes only.
Please visit My Account at pepco.com to view your energy use data.

Your next bill period is scheduled to end on July 26, 2021

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 30 days, **summer rates in effect.**

Type of charge	How we calculate this charge	Amount(\$)
Distribution Services:		
Customer Charge		15.09
Energy Charge	180 kWh X \$0.0108330 per kWh	1.95
Residential Aid Discount		
Surcharge	180 kWh X \$0.0004770 per kWh	0.09
Administrative Credit	180 kWh X \$0.0001512- per kWh	0.03-
Underground Project Charge	180 kWh X \$0.0000300 per kWh	0.01
Subscriber Org Offset Credit		17.12-
Subtotal (Set by DC PSC)		0.01-
EDIT Credit 5 Year - KWH	180 kWh X \$0.0001400- per kWh	0.03-

Page 2 of 4

☐ Check here to enroll in the Direct Debit plan

Sign and date here _____

By signing here, you authorize Pepco to electronically deduct the amount of your monthly bill from your checking account each month. The check you send with this signed authorization will be used to set up Direct Debit. You understand that we will notify you each month of the date and amount of the debit, which will be on or after the due date stated on your monthly bill. You understand that to withdraw this authorization you must call Pepco. You understand that Pepco does not charge for this service, but that your bank may have charges for this service.

Customer Service Centers

Washington DC

701 Ninth St NW

(Mon - Fri) 8:30am - 5:15pm

2300 Martin Luther King Jr Ave SE (Mon - Fri) 9:00am - 5:00pm

Maryland

201 West Gude Dr, Rockville

(Mon - Fri) 10:00am - 2:00pm

8300 Old Marlboro Pk, Forestville (Mon, Wed, Fri) 10:00am - 2:00pm

Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

DC GOVT DEPARTMENT OF ENERGY & ENVIRONME

Account number: [REDACTED]

Your electric bill for the period
May 25, 2021 to June 23, 2021

EDIT Credit 10 Year - KWH	180 kWh X \$0.0004700- per kWh	0.08-
Energy Assistance Trust Fund	180 kWh X \$0.0002322 per kWh	0.04
Sustain Energy Trust Fund	180 kWh X \$0.0027928 per kWh	0.50
Public Space Occupancy Surcharge	180 kWh X \$0.0025200 per kWh	0.45
Delivery Tax	180 kWh X \$0.0070000 per kWh	1.26
Subtotal (Not set by DC PSC)		2.14
Total Electric Delivery Charges		2.13

Supply Charges: These charges reflect the cost of producing electricity for you. You can compare this part of your bill to offers from competitive suppliers. Based on billed use, your average annual price to compare is 7.57 cents per kwh.

Billing Period: May 25, 2021 to Jun 23, 2021 (30 days)

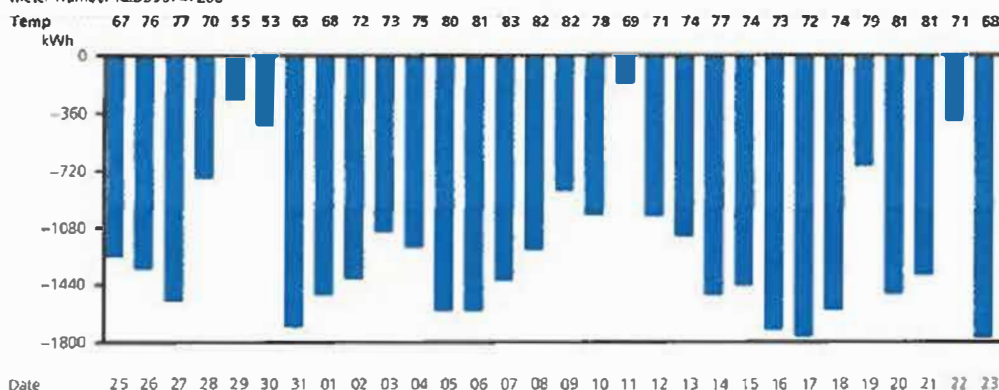
Type of charge	How we calculate this charge	Amount(\$)
Transmission Services:		
Transmission Minimum Charge	Includes First 30 kWh	0.12
Energy Charge	150 kWh X \$0.0110700 per kWh	1.66
Generation Services:		
Generation Minimum Charge	Includes First 30 kWh	1.91
Energy Charge	150 kWh X \$0.0621333 per kWh	9.32
Procurement Cost Adjustment	180 kWh X \$0.0014892 per kWh	0.27
Total Electric Supply Charges		13.28
Total Electric Charges - Residential-R		15.41

Energy Usage History

	Jun 20	Jul 20	Aug 20	Sep 20	Oct 20	Nov 20	Dec 20	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21
Temp	75°	82°	80°	72°	64°	55°	45°	39°	35°	48°	57°	65°	73°
Days	26	31	32	30	29	29	32	34	27	29	31	31	30
kWh	-36320	-31040	-24742	-23114	-23230	-15300	-13877	-15011	-11309	-27990	-32348	-38539	-36400

Your daily electricity use for this bill period. Visit My Account at pepco.com to see your hourly electricity use.

Meter Number KZD350747208



Follow us on Twitter at twitter.com/PepcoConnect. Like us on Facebook at facebook.com/PepcoConnect.

**DC GOVT DEPARTMENT OF ENERGY &
ENVIRONME**

Account number: [REDACTED]

Exhibit A-5
Public Version [REDACTED]

Your electric bill for the period
May 25, 2021 to June 23, 2021

You can help a Pepco customer in need of assistance with their energy bills. Simply pay exactly \$1.00 over your Pepco bill amount and that dollar will be contributed to the Good Neighbor Energy Fund administered by a local 501(c)3 non-profit organization. Amounts over \$1.00 will not be identified as a contribution and will result in a credit to your account. Pepco will match each donation by contributing a dollar to the fund, up to \$100,000.

Pepco EV charging stations are in a neighborhood near you, learn more here [Pepco.com/ev](https://www.pepco.com/ev).


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700001500232023150000008000255370000000000000000000000000010
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Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Operand	Contract Account	Subscriber Organization	Address	Meter	Start Date	End Date	Excess Generation
I_CF_SFA01		SFA01		TED385387478	03/25/2020	04/23/2020	3,948
I_CF_SFA01		SFA01		TED387390787	03/25/2020	04/23/2020	4,036
I_CF_SFA01		SFA01		NXA116012344	03/25/2020	04/23/2020	2,416
I_CF_SFA01		SFA01		TED383925796	03/25/2020	04/23/2020	3,848
I_CF_SFA01		SFA01		TED387390770	03/25/2020	04/23/2020	5,684
I_CF_SFA01		SFA01		NXA113574535	03/25/2020	04/23/2020	2,828
I_CF_SFA01		SFA01		NXA152632960	03/25/2020	04/23/2020	2,025
I_CF_SFA01		SFA01		TED351936183	03/25/2020	04/23/2020	2,755
I_CF_SFA01		SFA01		NXA114371201	03/25/2020	04/23/2020	4,308
I_CF_SFA01		SFA01		TED350889212	03/25/2020	04/23/2020	2,170
I_CF_SFA01		SFA01		TED346211074	03/25/2020	04/23/2020	1,940
I_CF_SFA01		SFA01		NXA116009151	03/25/2020	04/23/2020	2,232
I_CF_SFA01		SFA01		KZD350747208	03/25/2020	04/23/2020	-160
I_CF_SFA01		SFA01		TED350705676	03/25/2020	04/23/2020	-3,606
I_CF_SFA01		SFA01		TED363533646	03/25/2020	04/23/2020	-2,972
I_CF_SFA01		SFA01		1ND355100460	03/25/2020	04/23/2020	2,015
I_CF_SFA01		SFA01		KZD381349822	03/25/2020	04/23/2020	8,240
I_CF_SFA01		SFA01		KZD381349443	03/25/2020	04/23/2020	7,920
I_CF_SFA01		SFA01		KZD383312620	03/25/2020	04/23/2020	9,280
I_CF_SFA01		SFA01		TED383925764	03/25/2020	04/23/2020	1,017
I_CF_SFA01		SFA01		KZD381349841	03/25/2020	04/23/2020	0
I_CF_SFA01		SFA01		TED350704123	03/25/2020	04/23/2020	5,518
I_CF_SFA01		SFA01		KZD383312724	03/25/2020	04/23/2020	7,200
I_CF_SFA01		SFA01		TED383925696	03/25/2020	04/23/2020	2,465
I_CF_SFA01		SFA01		TED350703771	03/25/2020	04/23/2020	3,684
I_CF_SFA01		SFA01		TED383925763	03/25/2020	04/23/2020	3,865
I_CF_SFA01		SFA01		KZD383312621	03/25/2020	04/23/2020	13,040
I_CF_SFA01		SFA01		KZD383312632	03/17/2020	04/23/2020	0
Total Excess Generation	Subscribed Energy	Unsubscribed Energy					
95,696	92495	3201					

Account Number	Move Out Date	CREF_OP	SUBS_PER	CURRENT ALLOCATION	OTHER SUBSCRIPTIONS	ANN_MONTH	RATE	START BILL	END BILL	TARIFF RATE	BILL CREDIT
	5/4/2020	I_CF_SFA01	0.100%	95	0	5	PDRS_R	4/21/2020	5/4/2020	-0.1199225	-\$11.39
	12/31/9999	I_CF_SFA01	0.100%	95	0	3	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.39
	12/31/9999	I_CF_SFA01	0.100%	95	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.39
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/7/2020	5/6/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/23/2020	5/21/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/7/2020	5/6/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	4/20/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/9/2020	5/8/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/17/2020	5/16/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27

12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.100%	95	0	4	PDRS_AE	4/24/2020	5/22/2020	-0.1199225	-\$11.39
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	4/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27

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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	319	4	PDRS_R	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	319	4	PDRS_R	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	319	4	PDRS_R	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27

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[illegible]

[illegible]

[illegible]

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	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/17/2020	4/17/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/15/2020	5/14/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/25/2020	5/26/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.100% 95	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.39
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	319	4	PDRS_AE	4/15/2020	5/14/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_AE	4/2/2020	5/1/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
	12/31/9999	I_CF_SFA01	0.099% 94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27

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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	5	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	5	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	3	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.100%	95	0	3	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.39
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/7/2020	5/6/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/20/2020	4/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	4/27/2020	-0.1199225	-\$11.27

12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	4/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/7/2020	5/6/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/7/2020	5/6/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/16/2020	5/15/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/1/2020	-0.1199225	-\$11.27

12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/7/2020	5/6/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/7/2020	5/6/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I CF_SFA01	0.099%	94	0	4	PDRS AE	4/7/2020	5/6/2020	-0.1199225	-\$11.27

[illegible]

[illegible]

12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	344	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/21/2020	5/19/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/23/2020	5/21/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/23/2020	5/21/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/25/2020	5/26/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/15/2020	5/14/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27

12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/2/2020	5/1/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/4/2020	5/5/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/16/2020	5/15/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/18/2020	5/18/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/22/2020	5/20/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/14/2020	5/13/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/28/2020	5/27/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/11/2020	5/12/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/17/2020	5/16/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/29/2020	5/28/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/30/2020	5/29/2020	-0.1199225	-\$11.27
12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/10/2020	5/11/2020	-0.1199225	-\$11.27

[illegible]

[illegible]

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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/3/2020	5/4/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/2/2020	4/29/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/24/2020	5/22/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_R	4/8/2020	5/7/2020	-0.1199225	-\$11.27
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12/31/9999	I_CF_SFA01	0.099%	94	0	4	PDRS_AE	4/8/2020	5/7/2020	-0.1199225	-\$11.27

Allocation Legend	
ACCOUNT NUMBER	11-Digit Subscriber account number
MOVE OUT DATE	Date that subscriber has set for changing addresses; subscribers that have not changed addresses will show 12/31/9999
CREF_OP	"Community Renewable Energy Facility Operand;" the group to whom the subscriber belongs
SUBS_PER	Fractional of energy allocated to the subscriber, listed in percentage; sum of allocations for each group operand may not exceed 1
CURRENT ALLOCATION	Kilowatt-hours received during the current bill cycle
OTHER SUBSCRIPTIONS	Kilowatt-hours received during the current bill cycle from other facilities than the subscribed facility (relevant for year-over-year totals)
ANN_MONTH	Month of the year around which the subscriber's annual usage is calculated
RATE	The category of usage that determines how much credit the subscriber will receive per kilowatt-hour
START BILL	Dates bounding the current billing cycle for each subscriber
END BILL	
TARIFF RATE	Tariff rate per kilowatt-hour (\$/kWh)
BILL CREDIT	Total credit amount for current billing cycle (calculated by multiplying the CURRENT_ALLOCATION by the TARIFF RATE)

Date	Notes
17-Jul-20	DOEE slideshow of allocation and crediting issues (SFA01, SFA02, SFA03, SFA04, SFA05, SFA06)
19-Mar-21	DOEE requests bi-weekly meetings; DOEE requests lists of all generating facilities for SFA including with metering issues
15-Apr-21	Commucation with subscribers regarding re-billing; remediated allocation reports for SFA02 for June-December 2020. Expted additional remediated reports for that period for other aggregations; remediated reports coming for Jan-March 2021 due to metering issues; missing allocation reports due to metering/electrical issues; unsubscribed energy not available unless call made to ask for refund; concerns about customer accounts that need to be remediated if COVID restrictions lifted
29-Apr-21	Missing allocation reports for SFA01, SFA03, SFA04, SFA05; remediated reports for period June-Dec 2020 expected; past due unsubscribed energy
7-May-21	Customare Care team education, potential for collaborative outreach
13-May-21	Missing remediated allocation reports; delays in calculation and receipt of unsubscribed energy; SFA19 still not activated in Pepco's community solar portal; delayed ATO for SFA14
18-May-21	SFA Meeting with Pepco/DOEE leadership
27-May-21	Missing allocation reports for SFA01, SFA03, SFA04, SFA05; improvements to verbiage used to amend customer bills when issuing one-time remediated CNM credits; incorrect allocation reports for SF01 and SFA06; VCREf moved from SFA05 to own aggregation of SFA19
8-Jun-21	SFA Meeting with Pepco/DOEE leadership; CREF benefits to subscribers; interconnection
10-Jun-21	Expecting remediated reports for SFA01, SFA03, SFA04, SFA05; missing allocation reports to be sent in June; issues with SFA19; rebilling of customers and remediated allocation reports to show distributed credits; remediation needed for SFA05
24-Jun-21	remediated allocation reports; bulk upload options
8-Jul-21	MMA account discussion; issues with credits on SFA01; subscriber bills cancelled/reissued without notice to Subscriber Orgs; issues with carryover credits; issues with renewal of customer account view
22-Jul-21	MMA account discussion
27-Jul-21	SFA Meeting with Pepco/DOEE leadership; subscription management; interconnection cost and timeliness
5-Aug-21	Crediting issue with SFA01 due to Pepco "estimated meter reading," SFA01 customers notified and sent one-time credit, 987 customers impacted. Groundswell needing access to portal. Issue getting Pepco customer service numbers.
2-Sep-21	Issues with credits for SFA06, SFA09, SFA19; timeliness of allocation reports; missing unsubscribed energy payments
16-Sep-21	Issues with credits SFA09, SFA19; and CREF aggregations needing to be amended
30-Sep-21	Discussion of generation and crediting issues for SF09, SFA16, SFA19, DOEE requested billing error filings
7-Oct-21	
21-Oct-21	
18-Nov-21	Half of September allocation reports missing; CNM crediting issues with SFA05 and SFA07; October SFA04 billing error report request
20-Dec-21	SFA07 reports missing
3-Feb-22	DOEE unexplained checks potentially unsubscribed energy; discrepancy between ATO and allocation reporting; remediation of allocation reports and missed credits for handful of subscribers; issue with "conditional" ATO receipt which is not in the regulations

CREF Production and CNM Credit Allocation for the Solar for All Program

DOEE-Pepco Meeting

July 17, 2020



Background: Solar for All

- Solar for All (SFA) has the goal of extending the economic benefits of solar energy to 100,000 LMI District residents by 2032
 - DOEE, in partnership with the DCSEU, develops and manages subscriptions for several SFA CREFs
 - SFA subscribers receive 3.5 kW of CREF allocation with target of \$500 in CNM Credits per subscriber per year
- Pepco is a critical partner in the success of SFA
 - Interconnection, subscriber management, and billing functions
- SFA Program success is rooted in community trust and predictability of subscriber benefits
 - SFA particularly important during current public health emergency and economic downturn
- Several issues have led to undercounting and irregularities in subscriber credits from SFA CREFs

Solar for All FY19 CREF Developments

CREF Name	Count of Facilities	Installed Capacity (kWdc)	Date of First System ATO	Count of Subscribers	Facility Status
SFA01 - [REDACTED] [REDACTED]	47	3,514.0	12/18/19	1,003	Activated
SFA02 - [REDACTED]	2	334.4	3/20/20	95	Activated
SFA03 - [REDACTED]	22	920.5	12/31/19	263	Activated
SFA04 - [REDACTED]	12	1,205.5	3/10/20	468	Activated
SFA05 - [REDACTED] [REDACTED]	4	1,661.77	6/26/20	328	Activated
SFA06 - [REDACTED]	1	2,650	TBD	468	Pending Activation

Note: Subscriber count fluctuates month to month

Summary of SFA CREF Issues

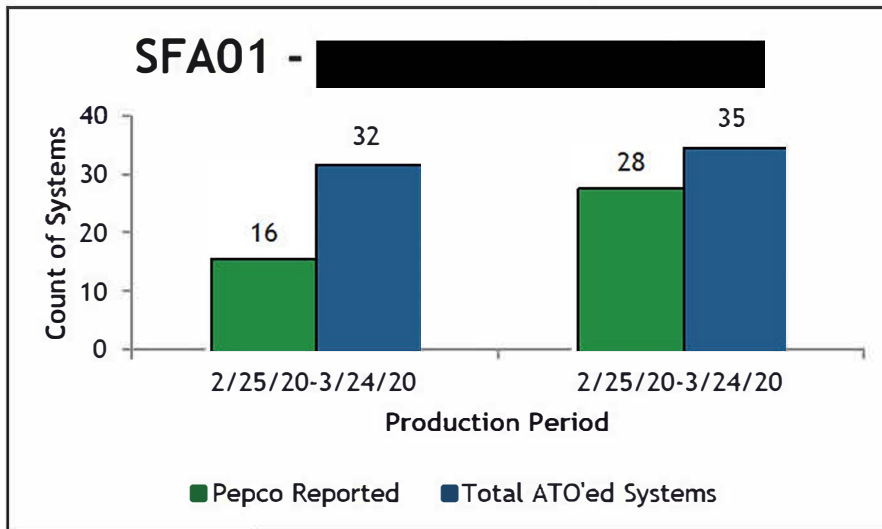
1. Incomplete CREF aggregation structure
2. Missing CREF production reports
3. Inaccurate CREF production reports
4. Delays between ATO date and date of CNM credits appearing on CREF production report
5. Suspension of all CNM Credits beginning on 4/24/20

Issue #1: Incomplete CREF Aggregation Structure

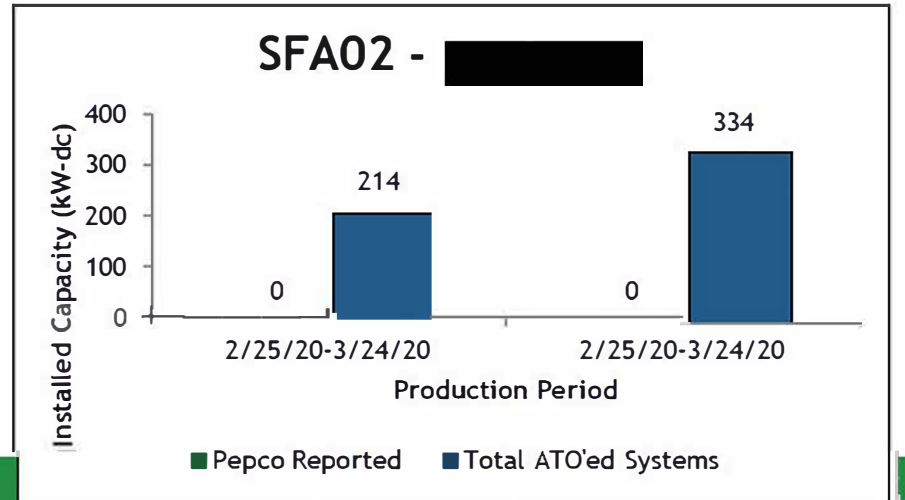
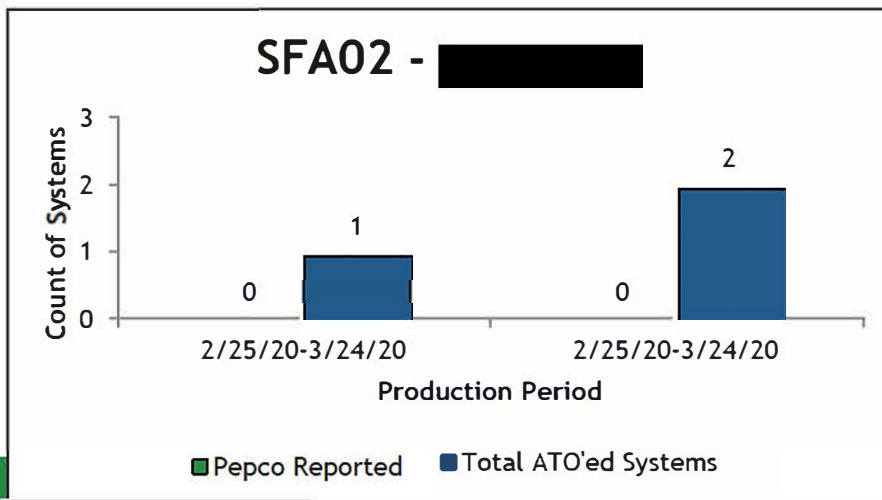
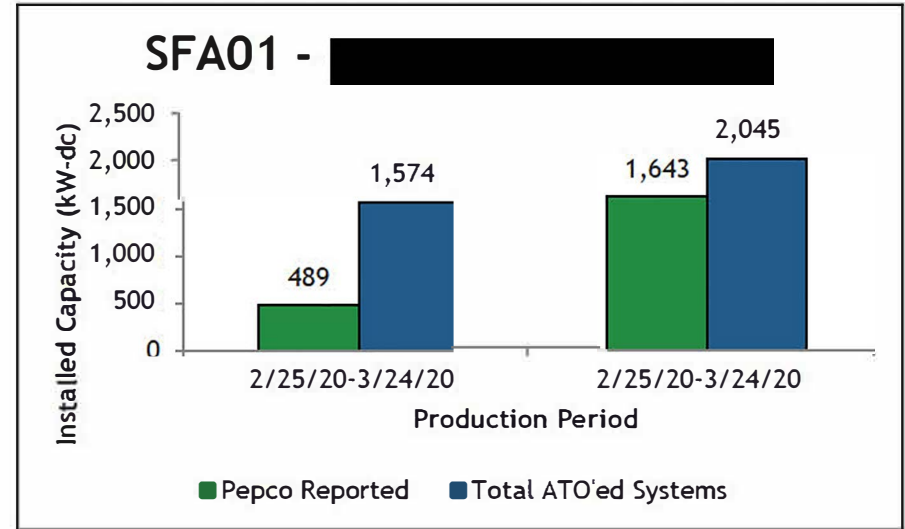
- Pepco's monthly production reports omit several solar facilities that should be included in DOEE's CREF aggregations
 - Account numbers and meter numbers missing from several solar systems
- Certain facilities in Pepco's production reports do not appear to be DOEE CREFs
 - [REDACTED] (SFA01)
 - [REDACTED] (SFA03)

Issue #1: Incomplete CREF Aggregation Structure

Count of Systems in CREF Aggregation

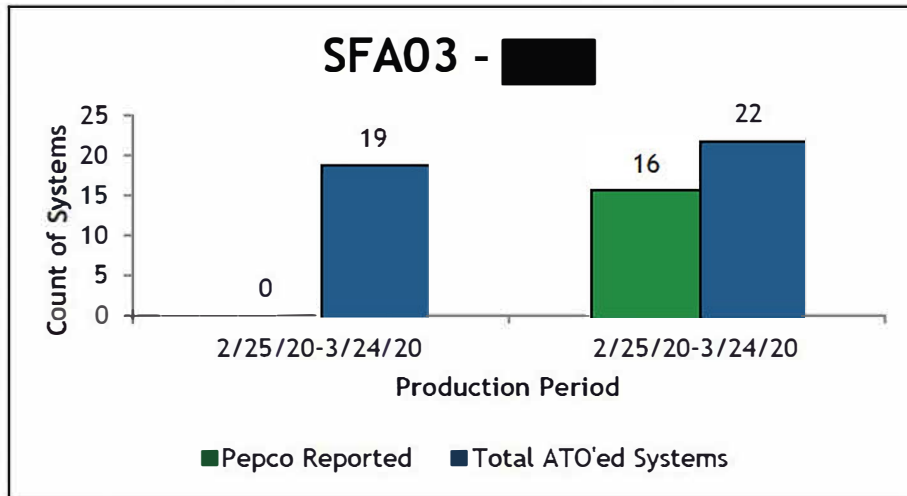


Installed Capacity

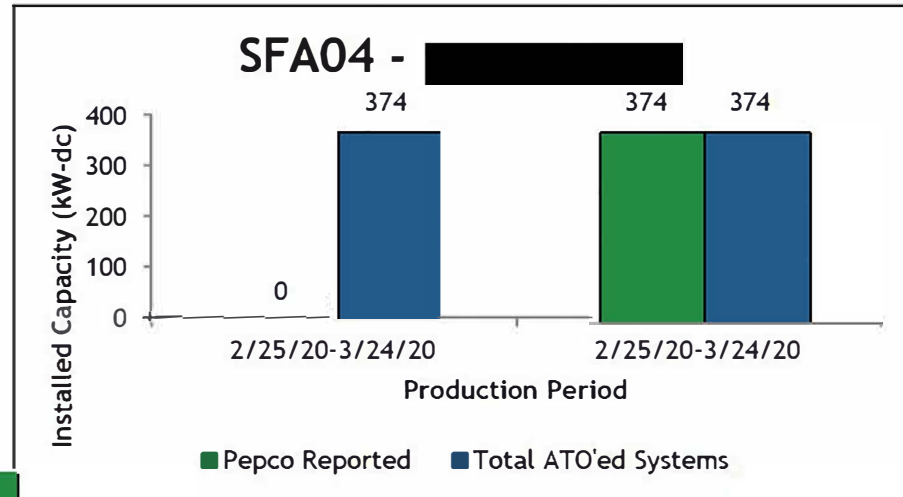
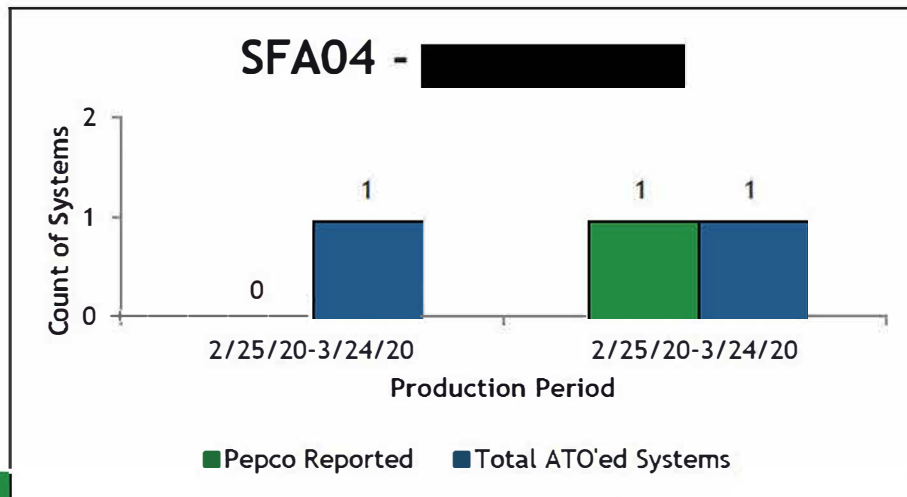
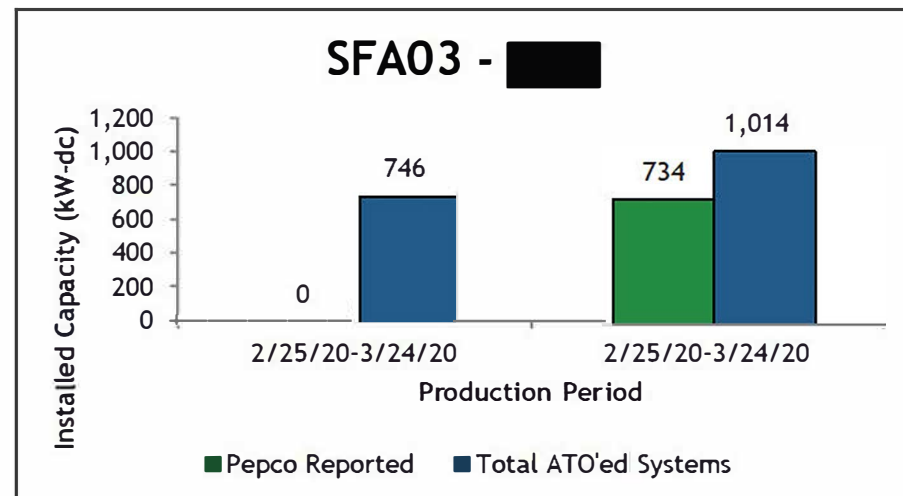


Issue #1: Incomplete CREF Aggregation Structure

Count of Systems in CREF Aggregation



Installed Capacity



Issue #2: Missing CREF Production Reports

- DOEE received no CREF production reports from Pepco for the following periods:

Missed Report #	Report Start Date	Report End Date
1	Prior to 1/25/20	
2	1/25/20	2/24/20
3	4/24/20	5/22/20
4	5/23/20	6/23/20

- Pepco explained that several missing reports were due to system errors preventing report generation
- Missing production reports have been reported to DOEE by non-SFA CREF developers

Issue #3: Inaccurate CREF Production Reports

- Pepco's monthly allocation reports include activated solar systems with zero and negative production

CREF	Address	Period	Pepco Metered kWh	DOEE Inverter kWh	Delta kWh
SFA01	[REDACTED]	2/25/20 - 3/24/20	-2,899	3,118	-6,007
SFA01	[REDACTED]	3/25/20 - 4/23/20	-3,606	3,756	-7,362
SFA01	[REDACTED]	3/25/20 - 4/23/20	-2,972	Not Available	N/A
SFA01	[REDACTED]	3/25/20 - 4/23/20	0	8,190	-8,190
SFA03	[REDACTED] [REDACTED]	3/25/20 - 4/23/20	0	Not Available	N/A
SFA03	[REDACTED] [REDACTED]	3/25/20 - 4/23/20	0	Not available	N/A

DOEE is in the process of compiling inverter-level production data for all SFA solar facilities

Issue #4: Delays Between ATO and CNM Credits Appearing on Production Report

- Significant delays between ATO date and CREFs appearing on monthly production reports.
- Monthly production reports summarize the allocation of CNM Credits to subscribers

SFA CREF	ATO Date	Date of First Production Report	Delta
SFA01 - [REDACTED]	12/18/19	2/23/20	67 days
SFA02 - [REDACTED]	3/20/20	Not yet	119 days, so far
SFA03 - [REDACTED]	12/31/19	3/25/20	85 days
SFA04 - [REDACTED]	3/10/20	3/25/20	15 days
SFA05 - [REDACTED]	6/26/20	TBD	
SFA06 - [REDACTED]	TBD	TBD	

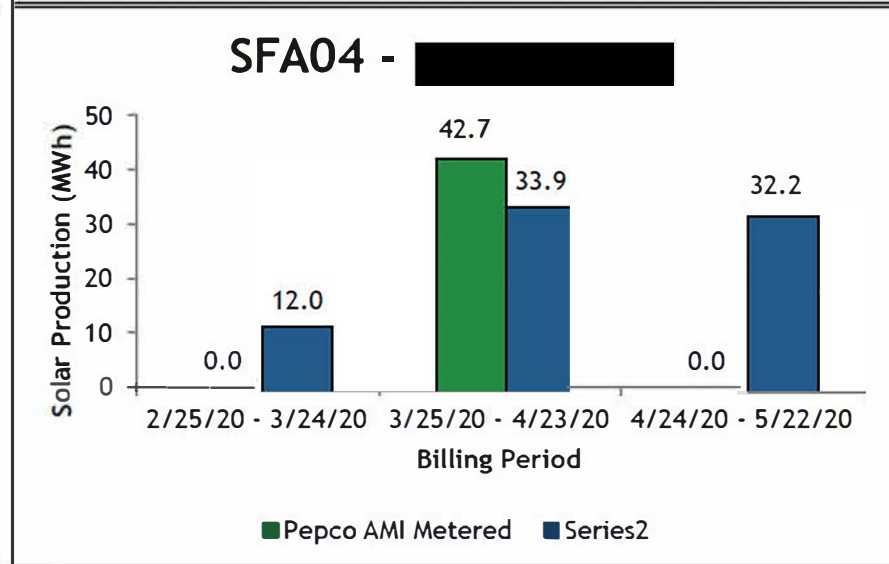
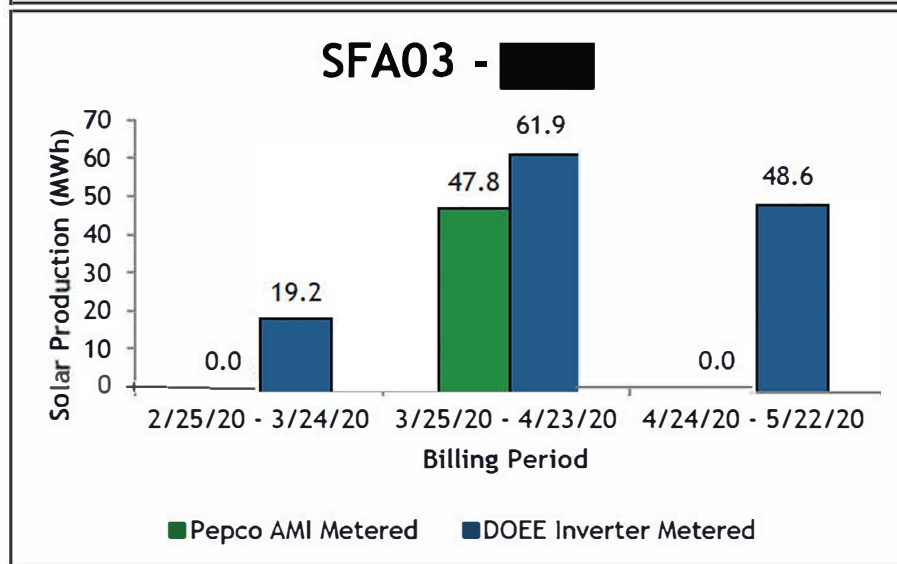
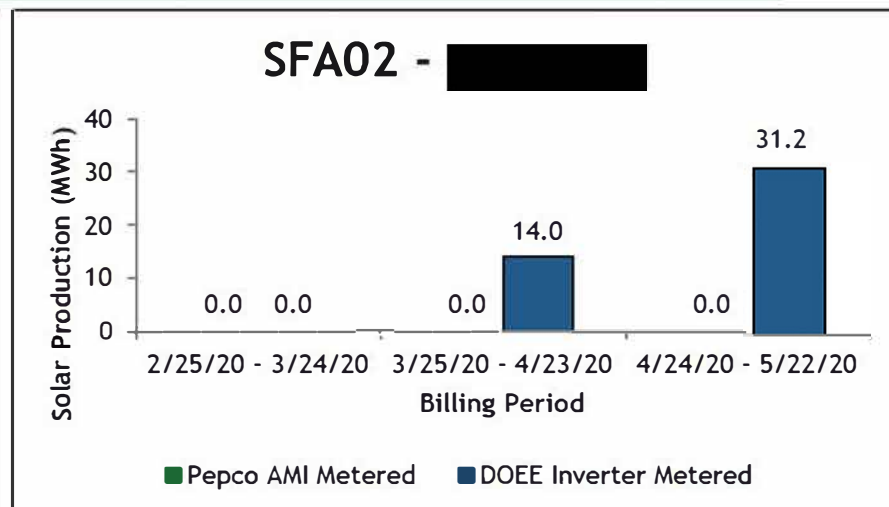
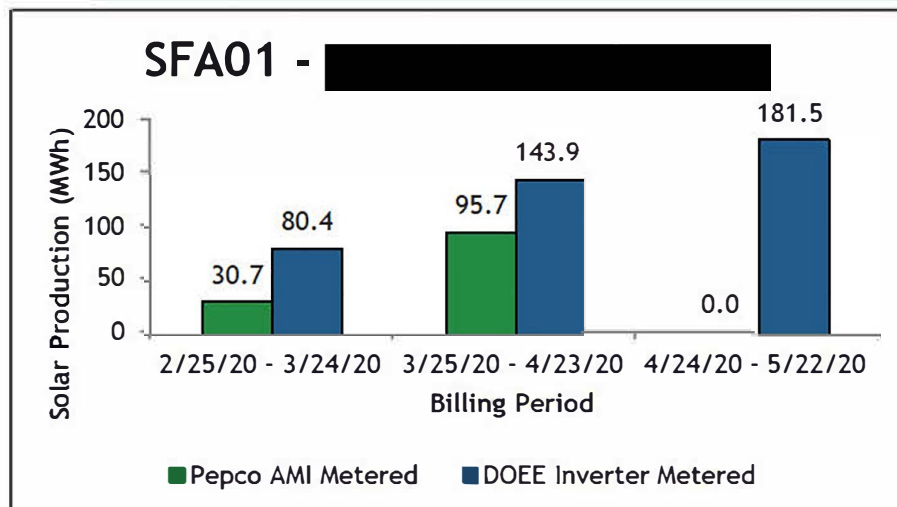
Issue #5: Suspension of all CNM Credits Beginning 4/24/20

- Subscribers on all SFA CREFs stopped receiving CNM Credits for CREF occurring on or after 4/24/20
- GPC team explained that the suspension of all CNM Credits was related to transfer of subscriber organization status for the CREFs

Net Impact of Issues #1-5

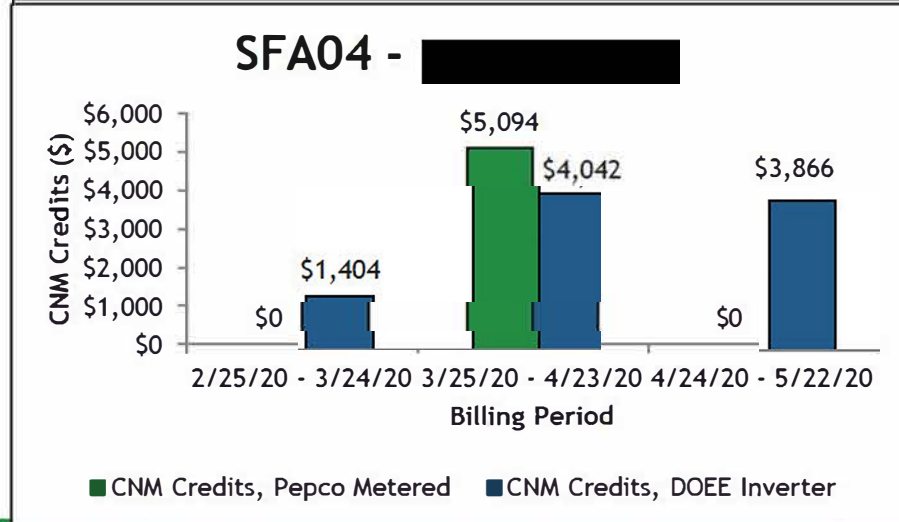
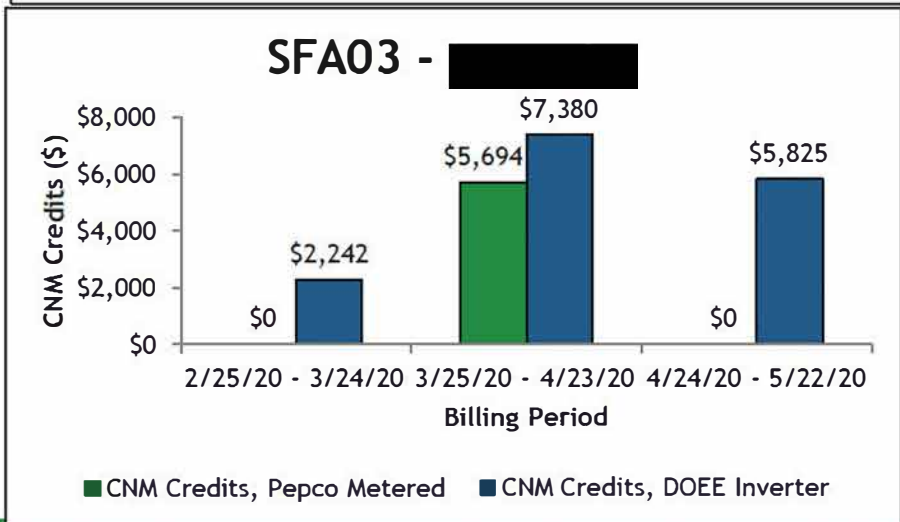
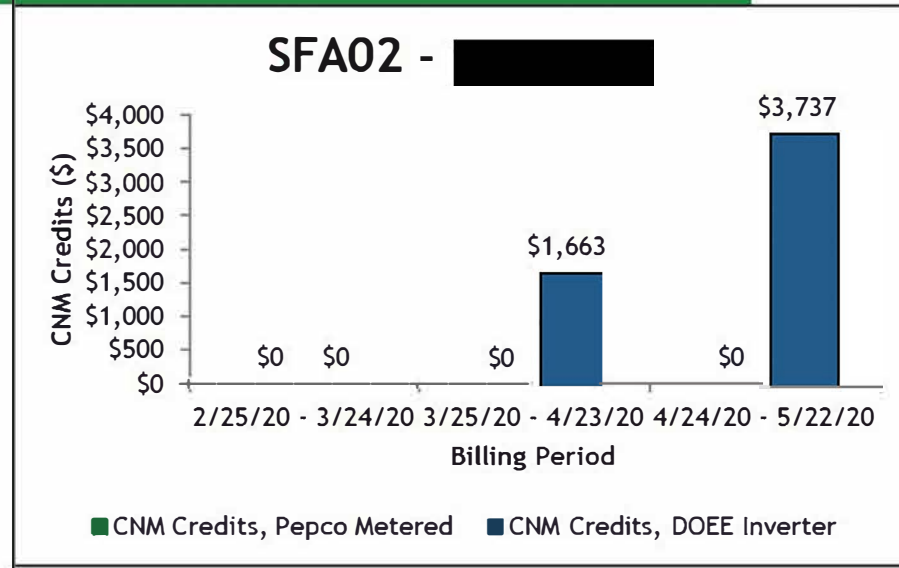
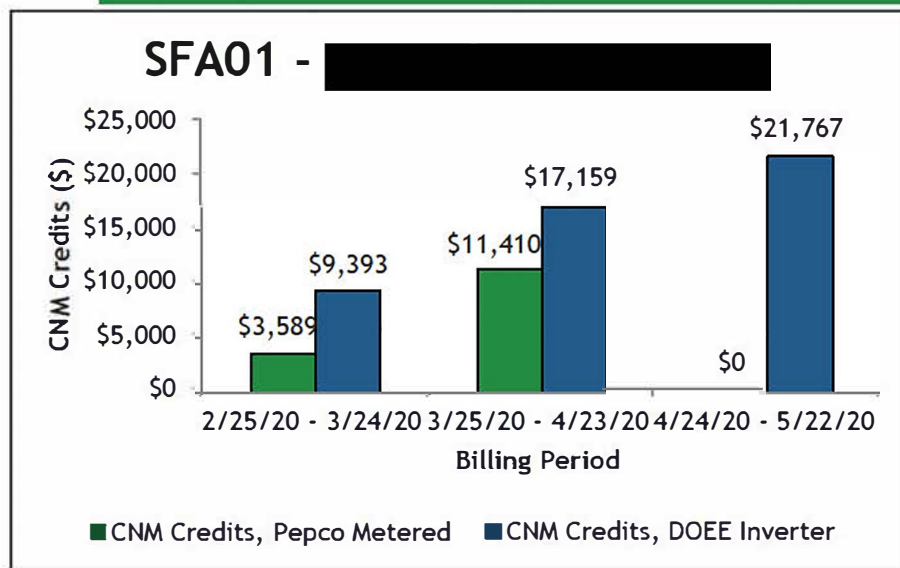
- See following slides

SFA CREF Production: Pepco Metered vs. DOEE Inverter Data



Note: DOEE inverter data is preliminary

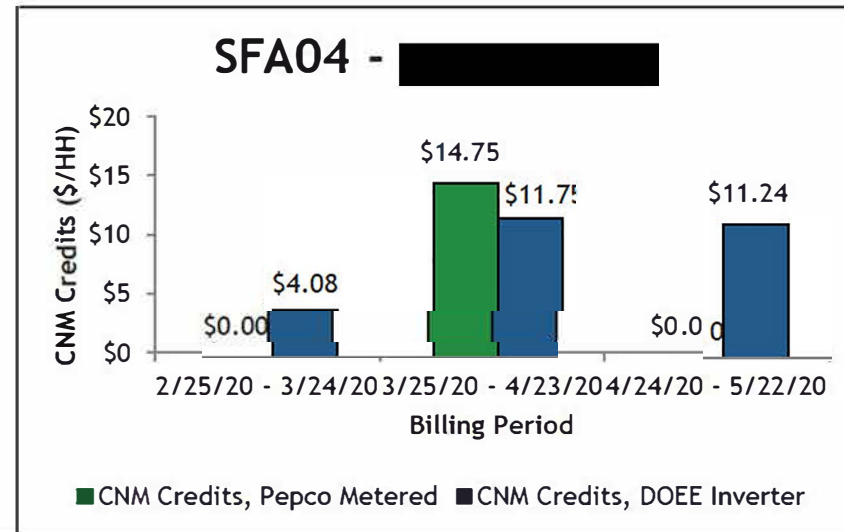
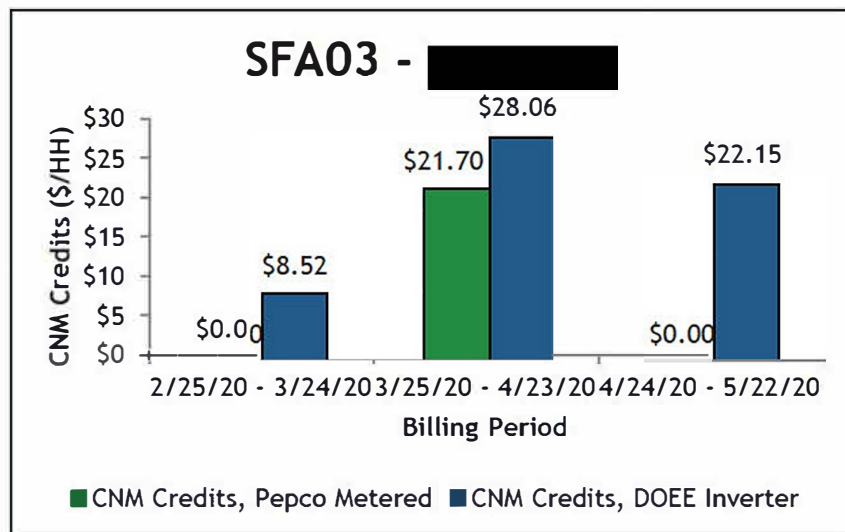
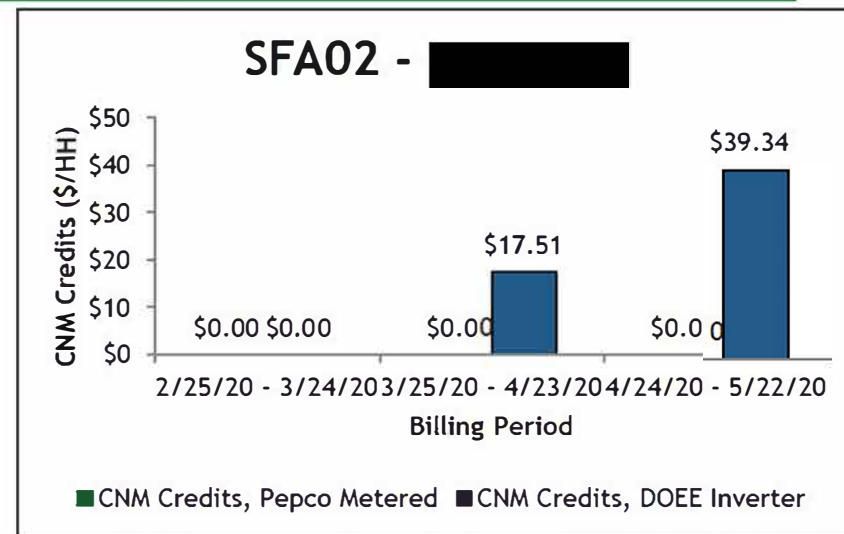
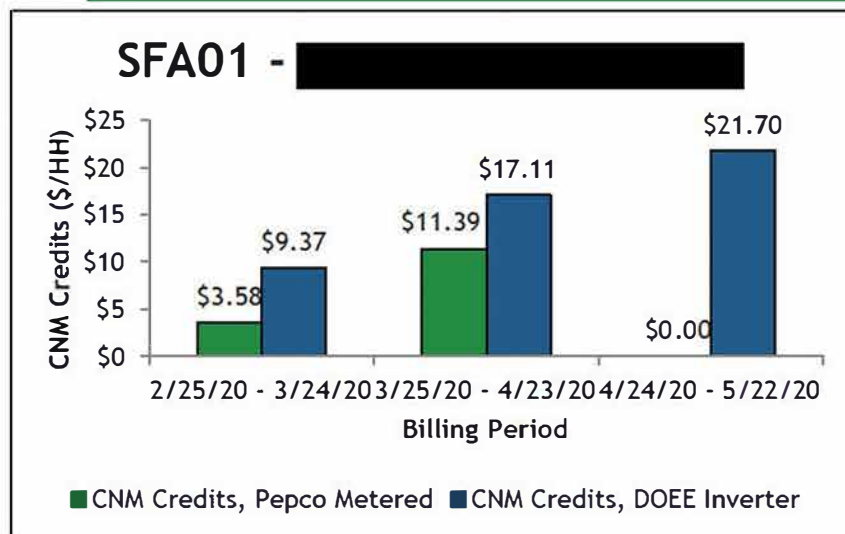
SFA CREF CNM Credits: Pepco Metered vs. DOEE Inverter Data



Note: DOEE inverter data is preliminary

SFA CREF CNM Credit Allocation: Pepco Metered vs. DOEE Inverter Data

Exhibit A-9
Public Version



Note: DOEE inverter data is preliminary



Unaccounted for Generation

- SFA CREFs exported a significant amount of generation to the distribution system that was not accounted for as either CNM Credits or Unallocated Energy
- Through 6/23/20, DOEE *initially* estimates the volume of Unaccounted for Generation as:
 - 1,235 MWh
 - \$151,000 of CNM Credits
 - \$82.52 of CNM Credits per subscriber (SFA01-SFA04)
- DOEE requests that Pepco work with DOEE to identify all Unaccounted for Generation from SFA CREFs
- All Unaccounted for Generation should be credited to SFA CREF subscribers at the Residential CNM Credit Rate

Discussion and Next Steps

Appendix Slides

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

In the Matter of	§	
	§	
the Complaint and Investigation into Potomac Electric Power Company's Community Energy Renewable Facility Practices	§ § § § §	Formal Case No. _____

AFFIDAVIT OF ARMANDO GAETANIELLO

I. INTRODUCTION & QUALIFICATIONS

1. My name is Armando Gaetaniello, and I am the Vice President of Business Development at NeighborhoodSun Benefit Corp (NS).
2. I am submitting this affidavit to address my company's experience with Community Renewable Energy Facilities (CREF) program in the District of Columbia.
3. Neighborhood Sun (NS) is a social enterprise with a mission to empower people to choose community solar. We are based in Silver Spring, MD and we were founded by the former leader of Clean Currents, a trailblazing clean energy company in the Mid Atlantic, which brought together thousands of people, businesses and organizations to switch to wind and solar power.
4. NS is one of the leading customer acquisition and management companies within the community solar industry. We currently manage more than 7,000 residential and commercial subscribers and well over 100 MWDC worth of solar in eight different markets.

5. Our experience with CREFs in Washington D.C. is limited compared to other jurisdictions. We currently manage subscribers for two CREFs located in DC, Robinson A and B, which total 97 kWDC of solar capacity.
6. Robinson Place A is located at 2836 Robinson, SE, Washington DC, 20020 and became operational on June 10, 2021.
7. Robinson Place B is located at 2825 Robinson, SE, Washington DC, 20020 and became operational on July 26, 2021.
8. Between Robinson A and B, we have about 25 customers that we enrolled in the Spring of 2021 and have been managing since.
9. My direct and personal experience is on the front-end, while developing the relationship with our client owning the CREFs. This affidavit compiles the experiences of the whole NS Team regarding enrollment, customer care, replacement and billing of our subscribers.
10. The issues that NS has experienced with this program has impacted NS in a way that we prefer to not participate in projects that are too small (below 500 kWDC) from now on.
11. My curriculum vitae is attached to this Affidavit as Attachment B-1.
12. This affidavit and the accompanying exhibits were prepared by me or under my direct supervision and control.

II. DISCUSSION

A. Lack of Crediting Carry-over Credits

13. We do not know whether our subscribers receive monthly carry-over credits as required by District code.

14. After reviewing monthly generation reports, we find that there is no way for us to find out whether, and if so, how many, credits have been carried over. Also, we have no way of checking how many solar carry-over credits, if any, are applied on a subscriber's bill.

B. Timeliness of the Delivery of the Credit Allocation Reports

15. Pepco's delivery of Monthly credit allocation reports has been inconsistent. While some have been received on time, we have received many of these reports several days after the 10th business day.
16. At the moment there are no outstanding credit allocation reports.

C. Billing Issues

17. It may be that several months pass before we can actually determine the validity of a new enrollment because Pepco requires the 22 digits "customer number" for verification. This number can't be verified promptly, leaving us uncertain of the validity of each specific enrollment for several months. The 22 digit "customer number" is not verified by Pepco until after the allocation report is submitted 30 days before COD of the project.
18. Because we cannot verify that those accounts are actually valid, this can be a hurdle for timely customer service especially for larger projects that we will work on in the future. Ideally, we would be able to verify enrollments during the enrollment phase or shortly thereafter.
19. Neighborhood Sun currently does not have the ability to check that the credit allocation is actually being applied to customer bills.
20. It is also difficult to get access to Pepco's billing team in a timely manner to assist with billing issues.

21. The PHI portal that is used to request customer usage via the account number and a signed authorization form is not currently allowing subscriber organizations to download the twelve months of historical usage needed to enroll a customer in Community Solar.

D. Discussion with Pepco

22. We have discussed these issues within the meetings between the DC Department of Energy & Environment, the Chesapeake Solar and Storage Association (CHESSA) and Pepco. The meetings mostly took place during the Fall of 2021.

To my knowledge some of the issues were resolved while many others could not be resolved.

23. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No. _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: ARMANDO GAETANIELLO

Signature: 

Date: FEBRUARY 15, 2022

Armando Gaetaniello

Cell: 301 256 5948 – Email: armando@neighborhoodsun.solar

CORE SKILLS AND COMPETENCIES

- 5+ years of experience in the Solar Energy Industry as Sales and Business Development.
- Able to build partnerships with community organizations as well as C-suites executives.
- Deep knowledge of the solar field from marketing, sales, and development perspectives.
- Self-starter, independent thinker, and analytically minded professional.
- Highly committed to solving the climate crisis and involved in state energy policies.

RELEVANT EXPERIENCE

Neighborhood Sun, VP of Business Development (Silver Spring, MD), Feb 2020 - current

- Originating and developing relationships with solar companies to build a pipeline of new community solar projects. Solidified our position as market leaders in the Maryland market and expanded to seven other jurisdictions with community solar programs.
- So far, I have negotiated and secured contracts worth more than \$2 million in Year1 revenues. Within two years we achieved a 4x growth in solar capacity due to this expansion.
- Within the next 1-2 years my current pipeline will add over \$10 million in Year1 revenues.

Neighborhood Sun, Sales Manager (Silver Spring, MD), Jan 2016 – Feb 2020

- Led Internal Sales Team as well as a Team of canvassers for lead generation. Developed relationships with External Sales Teams, and trained them on the products we offer.
- Managed the sales funnels to achieve a total of 3,000+ solar subscriptions (roughly 20 MWs worth of solar). Reviewed new accounts and resolved issues preventing them to be fully enrolled.
- Forged partnerships with local non-profits groups or businesses. Organized and coordinated public events, delivering several community presentations every month to different crowds.
- Developed marketing and sales material, trained sales Reps and marketers on solar products.
- Personally enrolled well over 450 solar subscribers through my own events and partnerships.

LGCYPower, Energy Consultant (Bowie, MD), Jan 2017 – Dec 2017

- Educating homeowners about the benefits of rooftop solar.
- Assessing initial feasibility and qualifying prospects (electricity bill, credit score, and roof age).
- Setting up appointments and enrolling customers in Power Purchase Agreements.
- Without any prior sales experience, I enrolled customers for about 180 KWs worth of solar power.

EDUCATION

January 2014: Master of Science “Global Change Management”. GPA: 3.8.

University of Sustainable Development, Eberswalde (Germany).

May 2008: Bachelor of Arts “Liberal Sciences of Land, Landscape, and Territory”.

University of Milan, Milan (Italy).

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

In the Matter of

**the Complaint and Investigation
into Potomac Electric Power
Company's Community
Renewable Energy Facility
Practices**

§
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Formal Case No. _____

**AFFIDAVIT OF
MR. PAUL ST. LOUIS**

I. INTRODUCTION & QUALIFICATIONS

1. My name is Paul St. Louis, and I am the Chief Operating Officer of CleanChoice Energy. I am submitting this affidavit to address my company's experience with the Community Renewable Energy Facilities ("CREF") program in the District of Columbia.
2. CleanChoice Energy is a mission-driven renewable energy company based in Washington, D.C., with more than 100 employees. We envision a world free of catastrophic climate change with pure, clean air and abundant renewable energy. In the District of Columbia, CleanChoice Energy, Inc. is a licensed electricity supplier (DC PSC Order 17035).
3. CleanChoice Energy Community, LLC ("CleanChoice" or "CleanChoice Energy") is an affiliated entity in solar development and community solar subscription management services.

4. My current role as Chief Operating Officer includes management of both retail energy and community solar.
5. I have 30 years of experience in the energy industry, of which over 20 years have been spent in deregulated energy markets serving residential, small commercial, and large commercial customers in both electric and natural gas deregulated energy markets. I have extensive experience in back-office operations, including sales support, billing, payments and arrears, transaction management, and customer care for both residential and commercial customers. I began working in the deregulated energy sector for the former The NewPower Company as an Operations Analyst in 2001. In 2002, I transitioned to the role as a Project Manager and Sales Operations Manager for the former Southern Company Gas (now GasSouth) which served over 200,000 residential and small commercial customers.
6. Beginning in 2005, I served in multiple leadership roles with responsibility for Customer Operations, Data Operations, Customer Relations, and Small Business Operations for Direct Energy Business where I supported the servicing of business customers in both electric and natural markets in North America including Texas, the northeastern United states and Canada. At the time Direct Energy was the 3rd largest retail energy provider in North America.
7. In 2014, I began working for CleanChoice Energy where I have previously served as Vice President and Senior Vice President of Operations, and currently serve as Chief Operating Officer. At CleanChoice I am currently responsible for providing service to over [BEGIN CONFIDENTIAL] [REDACTED] [END CONFIDENTIAL] customers across 8 states and the District of Columbia.

8. I have a Bachelor of Science degree in Computer Engineering from the State University of New York Polytechnic Institute.
9. My curriculum vitae is provided as Exhibit C-1.
10. This affidavit and the accompanying exhibits were prepared by me or under my direct supervision and control.

II. PURPOSE OF AFFIDAVIT

11. The scope and purpose of this affidavit is on CleanChoice's experience as a CREF services provider and our interactions with the Potomac Electric Power Company ("Pepco") and its representatives.
12. CREFs are also informally referred to as "solar farms" or "farms." Consumers who participate in the community solar program are often called "subscribers", but I also use the term "customer" to refer to community solar participants.
13. A list of CleanChoice's CREF projects is included as Exhibit C-2 to my affidavit.

III. SUMMARY OF AFFIDAVIT & FINDINGS

14. My affidavit can be summarized as follows:
 - CleanChoice Energy continues to experience significant issues with how Potomac Electric Power Company ("Pepco") has managed the District's community solar program.
 - A number of factors have negatively impacted our ability to deliver an exceptional community solar customer experience, including:
 - Pepco's processes slow down the process of adding or removing customers from solar farms;
 - persistent delayed and inaccurate customer credits;

- the inconsistency of when data is sent from Pepco to CleanChoice Energy and other Subscriber Organizations;
 - inconsistency in the actual data sent from Pepco;
 - lack of reliability in the tools Pepco provides Subscriber Organizations to manage customer account information; and
 - lack of visibility or transparency to basic program functions that are required in District Code.
- These ongoing operational issues stem from Pepco's failure to follow its obligations laid out in D.C. Code §§ 34-1501(15) and 34-1518.
15. These issues have had an impact on our interest to continue participating in the District's community solar program as a Subscriber Organization, as the above-mentioned challenges impact our ability to provide our customers with an excellent customer experience. The issues are significantly impacting the overall success of the community solar program in the District.

IV. DISCUSSION

A. Enrollment/Drop Issues

16. Pepco's quarterly enrollment/drop requests slows down the process of adding or removing customers from solar farms. This can significantly delay a customer's participation in or exit from a solar farm and impact the customers' electricity bills and CleanChoice Energy's ability to serve our customers with an exceptional level of service.
17. In late October of 2021, at the request of industry, Pepco agreed to begin processing enrollment/drop requests on a monthly cadence, instead of a quarterly cadence. On

November 2, 2021, Councilmember Mary Cheh introduced emergency legislation in the form of an amendment to Sec. 4. Section 118a(g) of the Retail Electric Competition and Consumer Protection Act of 1999 to reflect this agreement. The Temporary Act took effect when the congressional review period ended on February 18, 2022. Once codified, the Commission will undertake a rulemaking to implement the Sec. 4 provision. Once the regulations are updated, Pepco will need to update its tariff(s) to reflect this change. This change will be in effect for 225 days upon enactment. Future legislation is required to establish this as a permanent change to the code.

18. Enrollment is also hampered by Pepco's data requirements. Currently Subscriber Organizations are required to submit both an Account Number and a 22-digit Service Number to enroll a single customer. In many cases where the customer submits either number incorrectly, the enrollment fails and cannot be processed. This creates delays for that customer to enroll in the solar farm and creates additional work for CleanChoice Energy and other Subscriber Organizations to contact the customer to receive the correct numbers.
19. Additionally, there is currently no way for the Subscriber Organization to validate the Account Number with the customer's 22-digit Service Number through the utility's portal. So, the Subscriber Organization must rely on the customer to submit these numbers correctly, which often times does not happen, leading to failed enrollments. to the customer enrollment process could be streamlined if enrollments were processed on either an Account Number or a Service Number basis, rather than requiring both numbers.

B. Customer Account Verification Delay:

20. Currently, Pepco verifies customer accounts only after the solar farm is activated (i.e. when the solar farm goes live for the first time). This is potentially weeks after the Subscriber Organization submits the allocations. For our new, non-active farms, CleanChoice does not have insight into the fact our customers have dropped, nor do we receive transaction data for when those drops occurred. For example, customers may have moved or canceled their enrollment in between the point of sale and the activation of the solar farm.
21. Because Pepco does not verify enrollment submissions immediately for projects which are not yet active, Subscriber Organizations have little visibility into what accounts are properly enrolled and therefore, will be receiving credits for their subscription allocation of the solar farm. When Subscriber Organizations receive the customer account verification from Pepco, there may be farms that are now undersubscribed due to these customer drops. This adds pressure to the Subscriber Organization to quickly find new subscribers, potentially affecting their bottom line and the success of the program. For farms that are already active, Pepco notifies Subscriber Organizations of any rejects on a monthly basis (formally, a quarterly basis) through either the credit allocation file or the Community Solar Portal. Pepco should be directed to verify a customer account within two (2) business days of an enrollment being submitted. Additionally, Pepco should be directed to notify the Subscriber Organization prior to the solar farm going live when an accepted subscriber account is no longer eligible or if the customer opts-out of the solar farm subscription..

C. *Crediting Issues and Delays*

22. A "carry-over credit" is a colloquial term which can be defined as follows: Excess credits represent credits generated from the solar farm for a given period which exceed the customer's actual usage for which the generation credits are being applied. Since these credits cannot be used to offset the customer's usage for the respective period, the excess credits are carried over or banked (a.k.a. "carry-over credits") and may be used to offset usage in the customer's subsequent service periods or cashed out as per Pepco's rules for refunding excess credits.
23. The allocation files that CleanChoice Energy receives from Pepco do not contain information on whether the bill credit amount contains carry-over credits. Feedback received from Pepco has been that they simply pay any credit amount over 100% of their usage back to the customer as a line item on their bill; however, there is no easy way for Subscriber Organizations to reasonably verify that this is occurring.
24. Subscriber Organizations currently do not have the ability to provide customers with accurate information regarding their carry-over or banked credits or cash-outs, which can cause customer mistrust. CleanChoice has also experienced customers canceling service because of this issue.
25. Greater transparency on the allocation of carry-over credits would allow Subscriber Organizations to provide customers with accurate information regarding the value of their current banked credits still to be provided to them.

D. *Unsubscribed Energy*

26. District code requires that our company receive monthly payments from Pepco for unsubscribed energy. The CREF asset owner of each farm that CleanChoice Energy

manages receives monthly payments for unsubscribed energy as a credit on each farm's Pepco bill statement. However, there have been delays in the past.

27. To note, communication was sent from Pepco on 8/4/21 apologizing for the delay in CREFs receiving their unsubscribed energy credits, attached as Exhibit C-3. The asset owner of this solar farm did not receive a check along with this corresponding communication from Pepco.

E. Timeliness of the Delivery of the Credit Allocation Reports

28. CleanChoice has previously received the monthly credit allocation reports from Pepco on the 10th business day of each month, following the generation month. However, there have been instances where CleanChoice does not receive the files on or before the 10th business day of each month (see below). Some of these instances resulted in customers not seeing their community solar credits on bills and/or receiving a delayed community solar bill from CleanChoice.
29. There have been at least 13 instances in which reports have been delivered after the 10th Business Day; a list of specific dates and instances are provided below.
 - **April 6, 2020** - CleanChoice Energy received e-mail communication from Pepco that CREFs would not receive a monthly credit allocation report that month and would need to calculate subscribers' credits themselves.
 - **April 30, 2020** - CleanChoice received retroactive credit files for February and March 2020 from Pepco

- **May 7, 2020** - The credit files from Pepco were missing one project. CleanChoice Staff emailed Pepco on May 18, 2020, to request the late file. It appears that the credit file was originally sent to an email address that contained a typo.
- **July 17, 2020** - Pepco contacted Subscriber Organizations to inform us that technical issues with the generation of the monthly credit allocation report occurred. This occurred because Pepco recently completed the release of a billing system upgrade which adversely impacted the allocation reporting process.
- **July 25, 2020** - Pepco contacted Subscriber Organizations to update us that the Pepco team was still working to resolve the technical issues.
- **August 6, 2020 - October 15, 2020** - CleanChoice requested an update from multiple Pepco representatives on 8/6/20, and one of the representatives responded on 8/7/20 to inform us that they have been sending updates to Subscriber Organizations, which we had been receiving. A number of exchanges occurred where CleanChoice would request updates on the credit adjustments, and Pepco would respond.
- **April 20, 2021** - CleanChoice received delayed back reports for two projects for May through November 2020 credits.
- **April 22, 2021** - CleanChoice received delayed back reports for two projects for May through November 2020 credits.
- **April 23, 2021** - CleanChoice received delayed back reports for one project for May through November 2020 credits.
- **April 27, 2021** - CleanChoice received delayed back reports for one project for May through November 2020 credits.

- **April 28, 2021** - CleanChoice received delayed back reports for one project for May through November 2020 credits.
 - **April 29, 2021** - CleanChoice received delayed back reports for another Subscriber Organization's solar farm project for May through November 2020 credits.
 - **June 21, 2021** - CleanChoice received May 2021 generation late because CleanChoice was dropped from the distribution list. The May 2021 credit files, for 11 projects, were not received by the 10th business day of the month. CleanChoice had to contact Pepco to determine the delay and received the credit files on June 21, 2021.
30. In closing, CleanChoice Energy has not reliably received the monthly credit allocation reports from Pepco on the 10th business day of each month following the generation month. While there are no outstanding credit allocation files at this time, CleanChoice Energy is interested in ensuring that protocols are adopted to ensure timely reporting going forward.

F. Additional Data Issues

31. *Wrong Solar Farm Data:* Pepco sends a monthly credit allocation file for each solar farm to Subscriber Organizations each month, detailing the farm generation period, tariff rate, each customer's meter read start and end date (which Pepco labels as "Start Bill" and "End Bill"), the bill credit kilowatt hour and dollar amounts. Pepco sends this data through an excel sheet every month, which is a manual process that sometimes results in human errors.

32. For example, CleanChoice Energy has occasionally received the wrong solar farm data, for farms owned and operated by other organizations (i.e. CleanChoice received the wrong solar farm files on April 29, 2021, as mentioned above). These errors are a breach of customers' confidential account information and potentially disclose Subscriber Organization and CREF confidential and proprietary business information to competitors.
33. *Lacking Information on Credit Allocation Files:* There are current gaps in the data provided in the credit allocation files. Providing more data points (e.g. credit applied to bill, carry-over credits, previous month's bank, and banked balance) in the information shared each month would give Subscriber Organizations greater transparency and visibility into what is being credited on their customers' accounts and when these credits are being applied. The quality of the customer service Subscriber Organizations provide their customers would improve due to the increased transparency.
34. The lack of transparency combined with the clunky, manual process currently being used impacts the Subscriber Organizations' ability to provide a comprehensive, positive customer experience. For example, Subscriber Organizations do not currently know how many credits a customer has banked, and a Subscriber Organization cannot adjust a subscriber's future allocation without this data point. The lack of transparency on the customer's account creates an inability for the Subscriber Organization to provide valuable customer assistance, putting the success of the program in jeopardy.
35. Additionally, Subscriber Organizations currently do not have the ability to easily verify that the credit allocation is actually being applied to the customer's bill. In

CleanChoice's experience, only one or two Pepco representatives are familiar with the data files that are provided to Subscriber Organizations and therefore it is difficult to receive a timely response to questions. Resolving data inconsistencies or discrepancies can take multiple communications (both via email and phone) and multiple days. Having access to better data would increase the transparency and efficacy of the program. Currently, the lack of visibility impacts the Subscriber Organizations' ability to deliver a positive customer experience and diminishes the overall success of the program.

G. Accuracy of the Credit Exchange Reports

36. It does not appear that Pepco's monthly credit allocation reports contains the correct metering data as they differ from the CREF's revenue grade metering data.
 37. Solar revenue grade meters are meters that meet American National Standards Institute standards and measure solar power production.
 38. CleanChoice does not routinely validate or verify meter data against Pepco's allocation files because we do not have access to the meter data. That being said, in CleanChoice's experience the credit allocation reports received from Pepco are not consistently accurate. This opinion is informed directly by our historical record, which has multiple instances of incorrect data being distributed. A brief summary of those issues is outlined below, along with the actions that Pepco took to rectify the issue.
- **June 8, 2020** - Pepco contacted CleanChoice to inform us that there were 25 customers who had 0 allocations displayed in error on the May 2020 allocation file

sent by Pepco on **June 5, 2020**. Pepco reported that corrections were made in their billing system and revised bills had been reissued

- **June 10, 2020** - CleanChoice discovered that the May 2020 credit files received did not reflect the most recent portal submission.
- **October 15, 2020** - CleanChoice received September 2020 credit files on this date. There were a number of discrepancies in the file - accounts in the file of customers who never enrolled with CleanChoice and other customers who were enrolled previously by the enrollment deadline and were not in the file. Pepco responded on 10/26/20 with additional information and acknowledgement that they were aware of the issue of wrong accounts being sent.
- **November 2020** - For the November 2020 credit file, two customers (one on I_CF_NCS10 and one on I_CF_NCS13) on the file had been previously dropped and were receiving credits in error. Six customers (two from I_CF_NCS13, I_CF_NC14, and I_CF_NCS17 respectively) were listed as active customers enrolled in the project but did not receive credits on the initial credit file.
- **March 12, 2021** - On this date, the February 2021 credit files were received. These files contained an error in the file for I_CF_NCS10 that showed two additional accounts on the file that were not enrolled in the current Community Solar Portal. These accounts had been dropped almost a year prior from this farm and therefore should not have been receiving credits. CleanChoice Energy notified Pepco of this issue on March 22, 2021, after receiving this file on March 12, 2021. A Pepco representative indicated further investigation into the error was needed, and

CleanChoice Energy did not receive any further response on the matter after that comment.

- **April 12, 2021** - The March 2021 distribution email was sent on this date without a file for garden I_CF_NCS13. CCE had to request that the file be sent, and a Pepco representative provided us with the I_CF_NCS13 file on April 12th, 2021.
- **May 12, 2021** - The April 2021 distribution email was received on this date. However, the file for I_CF_NCS15 was not included, and CleanChoice Energy was also sent the file for I_CF_NCS23 in error, as we do not manage this CREF. Pepco provided us with the credit file for I_CR_NCS15 later that day.
- **June 21, 2021** - The May 2021 credit files were received on June 21, 2021, and therefore were not received by the 10th business day of the month. CleanChoice Energy contacted Pepco to understand the reasons for the delay as this information was not proactively communicated to Subscriber Organizations. Due to an internal error made by Pepco, all CleanChoice Energy contacts were dropped from the email distribution list for this month, so CleanChoice Energy did not receive the credit files for May until June 21, 2021. In addition, one file sent on June 21, 2021 (I_CF_SFA11) was for another Subscriber Organization's project that Pepco included instead of I_CF_NCS11. When this was communicated to Pepco, Pepco replied back that same day with an older copy of I_CF_NCS11 that was from April 2021's credit files. After CleanChoice Energy communicated that this second file was not the correct file, Pepco sent the updated version of I_CF_NCS11 on June 22, 2021.

- **September 14, 2021** - In the August 2021 distribution email received on this date, the files for I_CF_NCS09 and I_CF_NCS10 were not included and had to be requested again.
- **December 9, 2021** - All the November 2021 credit files received on this date were identical to the credit files received the previous month. CleanChoice Energy communicated this error to Pepco, as this information was not proactively communicated. Pepco then provided the correct November credit files on December 10th, 2021.

39. Without access to data, CleanChoice Energy cannot conduct a full audit of every credit allocation report received from Pepco to determine if they are correct.

H. Timeliness of Billing

40. CleanChoice subscribers are not consistently receiving Community Net Metering credits in the same billing month that the generation is recorded
41. The main factor for this is due to a delay of the effectuation of generation credits on customer invoices and the meter read end date of the respective farm. (ex. for the December 2021 credit files, the had a generation period of 10/22/21 to 11/22/21, but individual customers with service period end dates which occur within the first several days following a farm's meter read end date may not see the generation credits appear on their invoice until more than 30 days after the respective generation period of the farm. Therefore, it is not possible for all customers to receive these credits the same month that they were generated in unless meter reads groups were standardized for customers on particular farms. This delayed effectuation of generation credits on utility

invoices, on top of the delayed receipt of credit allocation files causes customer confusion.

I. Re-Billing of Subscribers

42. I do not have direct knowledge or experience to confirm that Pepco re-issued bills, or communication where this was expressly stated. However, in at least one instance where CleanChoice Energy reached out about an error in the Allocation Report, Pepco referenced working on "credit adjustments" due to billing errors. Pepco's communications to Subscriber Organizations were focused on inaccuracies of the allocation files and not on customer impact. However, when CleanChoice received one-off emails about particular customers, Pepco would sometimes state that bills were re-issued.
43. Pepco contacted us on December 16, 2020, stating that they had identified issues with allocation reports dating back to the period of May 2020 through November 2020 and would send out corrections by the March 2021 Allocation Report. However, it wasn't until April 29, 2021, that a Pepco representative had sent us the revised allocation reports for all subscribers on the project for the seven-month period. We then had to apply any subsequent changes to customer charges that the utility had found to their bills for June 2021. This meant that some customers now owed CleanChoice additional payments and other customers were issued a credit from CleanChoice for a prior overpayment.
44. In total, 82 customers were affected by this reporting issue and the updated allocations were for a cumulative total of \$6,796.03. CleanChoice sent out numerous email notifications to our customers to notify them of these issues. Several examples of the

allocation files from this time period and customer notification emails are attached to this Affidavit as Exhibit C-5. The highlighted values in the allocation reports represent added or changed allocations from the original reports.

45. Further, some CleanChoice subscribers have received a Community Net Metering credit of \$0 in error. Examples include:

- **June 8, 2020** - Pepco communicated that 30 customers received a \$0 credit in error on the May 2020 Allocation Spreadsheet. Pepco let CleanChoice know that corrections have been made in their billing system and revised bills have been reissued to impacted customers
- **July 2021 Credit Files:** One customer was charged \$0 because the allocation report for this month was generated on 8/02/21, which was before the customer's bill was generated on 8/17/21. Because of this delay, this customer went unbilled for a billing cycle. Their usage was then retroactively applied by CleanChoice Energy.

J. Discussions with Pepco

46. CleanChoice routinely notifies Pepco when a discrepancy or error is identified in the Allocation Report.

47. Additionally, CleanChoice and eight other impacted community solar companies sent a letter addressed to Pepco's Office of General Counsel on September 16, 2020, attached to this Affidavit as Exhibit C-6, expressing concern concerning for the ongoing operational issues stemming from Pepco's failure to follow COMAR 20.62 for the Maryland Community Solar Pilot Program and D.C. Code §§ 34-1501(15) and 34-1518 for the District of Columbia CREFs.

48. On October 5, 2020, industry representatives spoke with Pepco over the phone to talk through the issues highlighted in the September 16 letter.
49. On October 20, 2020, Pepco sent a letter to the industry representatives as a follow up to the October 5 call, attached to this Affidavit as Exhibit C-7. In the letter, Pepco noted that they expect that the issues with the crediting reports will be resolved by the end of October 2020, in time to provide the September credit allocation report. However, as outlined above, this issue was not fully resolved until April 29, 2021 - six months later.
50. In October and November of 2021, the District of Columbia Department of Energy and Environment (“DOEE”) organized three meetings with Pepco staff and industry members to talk through many of the issues that industry and our customers have been experiencing with the CREF program. Several representatives from CleanChoice Energy participated in these meetings.
51. While two issues were resolved as a result of these meetings (i.e. Batch functionality and increasing the frequency of enrollment add/drop periods to a monthly basis), a majority of the issues flagged for Pepco remain unresolved, and the timeline that Pepco laid out for addressing some of these issues extends into 2023 and 2023.
52. An additional issued that CleanChoice has experienced with respect to the District’s community solar program relates to the Customer Usage Portal Reliability.
53. Since May of 2021, the Pepco Portal for requesting customer usage has been intermittently functioning, despite repeated attempts for CleanChoice to push the urgency of this issue for our processing timelines in order to serve Community Solar customers efficiently. Since the Summer/ Fall of 2021, it appeared to stop functioning

completely. This portal is supposed to provide twelve (12) months of historical usage for customers. The sum of this usage is used to calculate the percent allocation for the community solar farm that the account will be enrolled in so that they receive the correct amount of credits to cover their electricity usage.

54. Pepco offered an “interim” solution of manually downloading and providing the historical usage to us via an email request and response process. Though this allowed CleanChoice to continue processing requests, this interim process was far slower, less reliable, and more cumbersome to use.
55. As of February 2022, it appears that the usage portal is still not functioning properly.
56. A summary of the communication between Pepco and CCE on this topic is provided below:

- **May 3, 2021** - CCE reported to Pepco’s Green Power Connection Team (GPC South) that the usage portal had not been working since last week. GPC South manually prepared usage requests.
- **July 30, 2021** - CCE reported to GPC South via email that an issue accessing the Pepco/Delmarva usage portal had been occurring since the day prior. The page would get stuck “processing” before resetting with no ability to download usage.
- **July 30, 2021** - GPC South responded that they would check with the technical team.
- **August 3, 2021** - CCE reported to GPC South via email that the usage portal had been working for a couple of days but was down again on 8/3/21.
- **August 4, 2021** - GPC South apologized and sent another request to the technical team.

- **August 10, 2021** - CCE reported to Pepco Net Energy Metering the same issue and asked for clarification on a potential solution and timeline.
- **August 11, 2021** - CCE requested a manual pull of a list of usage to be sent via email from Pepco Net Energy Metering.
- **August 17, 2021** - CCE reported to Pepco Net Energy Metering that the manual help would not be needed for the previously sent list because the portal had briefly worked the day before, but that it was back down again.
- **August 18, 2021** - Net Energy Metering said that they were working on it.
- **August 25, 2021** - CCE followed up with GPC South and they reported that the technical ticket was in progress.
- **September 7, 2021** - CCE requested an update. GPC South asked that we send the usage request forms individually via email.
- **September 17, 2021** - GPC South reported that the portal was working.

57. After continued outage of the usage portal, delays in receiving the manual email usage responses, and missing usage responses that required multiple attempts at following up, CCE made the internal decision to stop using the Pepco usage request method in November 2021.

58. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

)
)
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)
)
)

Formal Case No. _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: Paul Sr. Louis

Signature: Paul S. Louis

Date: 2/15/2022

PROFESSIONAL EXPERIENCE

CleanChoice Energy, Washington, DC

2014 - Present

Chief Operating Officer

2019 - Present

Responsible for development and execution of comprehensive operational strategy to ensure excellent customer service, customer onboarding and retention, revenue assurance, billing and remittance, and transaction management while minimizing cost-to-serve for CleanChoice Energy's North American residential and small business services.

Vice President, Operations

2014 - 2019

- Developed and led a high performing team through effective leadership and focused employee development
- Led delivery of onboarding, billing and remittance which supported the growth of our book from 20,000 to 200,000 residential and commercial customers with an annual revenue of over \$200M USD
- Manage and control \$5M USD annual budget, including closely monitoring all operating expenses to ensure scalability at minimal cost
- Established multi-functional contact center providing superior customer care, inbound and outbound sales
- Transformed customer interactions leading to superior Net Promoter Scores
- Implemented efficient operational processes for all sales channels, including Direct Mail, Tele-Marketing, Door-To-Door, and Digital sales efforts
- Created comprehensive reporting suite to effectively measure and track ongoing performance of our management of revenue assurance, customer lifecycle, and customer service
- Spearheaded our expansion into the Massachusetts, Ohio and New York retail markets
- Provided leadership and operational support of CleanChoice Energy's expansion into Community Solar

Direct Energy, Pittsburgh, PA

2005 - 2014

Sr. Manager, Small Business Operations

Aug 2011 – Feb 2014

Responsibilities include developing and implementing operational strategies, for all North American Small Business markets, which maximize customer experience while minimizing cost-to-acquire and cost-to-serve. Proactively establish operational readiness for new market entries, new sales channels and propositions. Ensure support for the delivery of sales and the small business operating plan.

- Designed and implemented a tablet-based field sales program. Program significantly reduced CTA. Third-party-verification costs reduced approximately 50%. Paper related costs reduced over 60%
- Designed and implemented operational capabilities in support small business' Loyalty, Referral and ChooseAgain propositions
- Established operational capabilities for multiple new markets for small business sales channels
- Redesigned field sales commissions and deal reconciliation processes
- Expanded sales into the Gateway Energy Services markets. 23,000 incremental sales in 18 months.
- Core team member responsible for the design and launch of DEHQ, an in-house portal supporting the indirect sales-channel.
- Provide direct oversight of the Small Business relationship with Direct Energy Residential. Established service level agreements, financial allocations and day-to-day management.
- Provided management and governance for Gateway and First Choice Power migrations from a Small Business perspective
- Significant part of team which grew the Small Business segment to ~50% of DEB's operating profit.

P R O F E S S I O N A L E X P E R I E N C E

Sr. Manager, Customer Relations

Nov 2009 – Aug 2011

Responsibilities include providing leadership, strategic direction and tactical support for the Customer Relations function for all electric and natural gas markets in the US, including day-to-day management of Direct Energy Business' call center, broker support and online customer service center.

- Consistently achieved Service Level and Customer Satisfaction of > 90% while reducing cost to serve 24%
- Established formal KPIs and improved reporting for interaction handling and customer experience
- Achieved employee engagement scores well above company average
- Implemented measurements for interaction quality and overall customer satisfaction
- Optimized the capabilities of existing call handling system to improve delivery of service
- Established team web portal to improve communication and access to information

Sr. Manager, Data Operations/Transaction Management

2008 – 2009

Responsibilities included management of the Data Operations function serving 55 electric and 24 natural-gas markets across the US. Responsible for managing the company's back-office data stream for all power and gas transactions, including validation, reconciliation and quality control of all EDI transactions. Exception management for all transactions related to usage, enrollment, invoices, payments, etc.

- Significantly reduced exposure and improved cash flow relative to the COMED single bill market
- Implemented improved exception reporting to reduce days outstanding
- Implemented quality and completeness measures to ensure all inbound and outbound transactions were processed timely and accurately
- Improved ability to reconcile internal gas customer list against each respective LDC Pool
- Implemented renewal/drop management for improved reconciliation of booked account data
- Reduced CTS through consolidation of sales support and enrollment functions while increasing efficiency
- Improved reconciliation of booked/hedged vs. billed for natural gas and power accounts
- Established control points & system of record for customers; enabling cross-functional reconciliation
- Developed centralized contract intake process for all North American markets (US and CA)

Manager, Customer Operations

2005 – 2008

Direct oversight of the Customer Operations function for all power and gas markets served in the Northeast and Mid-West US. Responsibilities included management of the post-sale customer lifecycle including Customer Care. Establish and analyze operational metrics and goals. Develop and administer processes & systems which support management of all post-sale functions.

- Increased enrollment success rate from 83% to a monthly rolling average > 95%
- Improved average number of submissions per enrollment from 1.8 to 1.06
- Decreased average enrollment duration from 10 to 4 days
- Reduced number of renewal & drop errors through improved validation of customer data
- Created and previously non-existent internal C&I Customer Care team
- Established reporting and key performance metrics
- Implemented web-based work-flow-management system to effectively manage customer issues.

P R O F E S S I O N A L E X P E R I E N C E

Southern Company Gas, Atlanta, GA

2002 – 2005

Manager, Sales Operations

2004 – 2005

Responsibilities included management of a multi-segment direct-Sales Operations organization serving the Georgia deregulated natural gas market. Established, measured and analyzed sales metrics and goals.

Managed sales forecasts, budgets, and customer contracts.

- Established a sales operations organization designed to support the achievement of all sales goals. Efforts of the team helped to increase the company's overall market share from 11% to 12.5%.
- Implemented contract management system for medium to large commercial accounts.
- Developed and implemented a commission-based pay plan for Direct Sales Executives.
- Established key metrics and weekly reporting to enable goal tracking and analysis of sales efforts.
- Developed operational processes and support for a full-time, D2D small commercial sales team.
- Established functional-level budget reporting. Department remained under budget.

Project Manager, Customer Operations

2002 – 2004

Responsibilities include management, planning and budgeting of all projects for the Customer Operations function. Primary focus related to improvements and enhancements of the billing application and all supporting processes.

- Managed transition of all back-office operations to new BPO, on time and under budget. Effort involved transition of all functions in the lead to cash value stream.
- Increased on-time billing percentage from ~96% to ~99%.
- Reduced average number of billing exceptions older than 30 days from 1500+ to zero in 60 days.
- Improved Invoice presentation and accuracy while ensuring compliance with required billing practices.
- Led team to identify and document and existing issues with current billing system.

The New Power Company, Purchase, NY

2001 - 2002

Business Analyst, Operations and Technology

Responsibilities included marketing campaign implementation and capacity planning from an operations perspective for a start-up energy company, operating in over 25 competitive deregulated energy markets, serving over three million customers. Expanded the market and increased sales for non-commodity products.

- Increased sales conversion rate 147% through focused sales training and effective incentives.
- Established a personalized account management team for commercial and industrial accounts.
- Discovered and resolved margin leakage of over \$50k/month through the analysis of current billing methodologies and improvement of existing processes.

Sunoco, Inc, Philadelphia, PA

1999 - 2001

Training and Development Consultant

Retail Operations

Amerada Hess, Woodbridge, NJ

1992 - 1999

Multiple Roles

Retail Operations

E D U C A T I O N

Bachelor of Science - Computer Engineering, SUNY Polytechnic Institute, Utica NY

CleanChoice Energy CREF Projects

Project Name	Location	Project Size (kWDC)	Interconnection Date	Date of Operation
I_CF_NCS09	[REDACTED]	[REDACTED]	12/28/2018	12/28/2018
I_CF_NCS10	[REDACTED]	[REDACTED]	9/4/2019	9/28/2019
I_CF_NCS11	[REDACTED]	[REDACTED]	3/5/2019	3/5/2019
I_CF_NCS13	[REDACTED]	[REDACTED]	9/4/2019	10/27/2019
I_CF_NCS14	[REDACTED]	[REDACTED]	9/4/2019	10/27/2019
I_CF_NCS15	[REDACTED]	[REDACTED]	9/4/2019	10/27/2019
I_CF_NCS16	[REDACTED]	[REDACTED]	9/4/2019	4/28/2020
I_CF_NCS17	[REDACTED]	[REDACTED]	3/17/2020	5/2/2020
I_CF_NCS18	[REDACTED]	[REDACTED]	9/6/2019	2/26/2020
I_CF_NCS21	[REDACTED]	[REDACTED]	12/7/2020	1/7/2021

I CF NCS22	[REDACTED]	[REDACTED]	12/7/2020	1/8/2021
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[REDACTED]@cleanchoiceenergy.com>

Community Solar Unsubscribed Energy Credits

Cc: [REDACTED]@pepco.com> [REDACTED]@exeloncorp.com>

Wed, Aug 4, 2021 at 7:36 PM

All,

We apologize for the experience you have had receiving your unsubscribed energy credits.

Community solar is important to the community and to Pepco, and we want to provide a seamless service to ensure the best customer experience.

We understand how frustrating this delay must have been and are writing to update you on the status of your unsubscribed energy payments

Over the past weeks we have been implementing a new system to help with posting the unsubscribed energy credits to your account(s)

as well as distributing the past unsubscribed energy payments we owe you.

As a result, a one time credit for all the unsubscribed energy credits from 2020 will be applied to the August billing statements

and a separate one-time credit for year 2021 will be applied to the September billing statements.

You can request a payout of the total unsubscribed energy credits by contacting our Customer Service department and request to be transferred to the Credit department

Pepco Washington DC & Maryland: 202-833-7500

Delmarva Power & Light- Maryland: 800-375-7117

Thank you for your patience,

[REDACTED]

Snr. Business Analyst, Customer Solutions

Green Power Connection



Edison Place

701 9th Street NW

Washington, DC, 20001

Office: (202)428 1314

██████@pepco.com www.exeloncorp.com

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	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT
4											
5					12/31/9999		I_CF_NCS17	0.17105		0	41
6					12/31/9999		I_CF_NCS17	0.01443		0	3
7					12/31/9999		I_CF_NCS17	0.04064		0	9
8					11/16/2020		I_CF_NCS17	0.03976		0	9
9					12/31/9999		I_CF_NCS17	0.0146		0	3
10					12/31/9999		I_CF_NCS17	0.0139		0	3
11					12/31/9999		I_CF_NCS17	0.0476		0	11
12					12/31/9999		I_CF_NCS17	0.00925		0	2
13					2/22/2021		I_CF_NCS17	0.01919		0	4
14					8/5/2020		I_CF_NCS17	0.0258		0	6
15					12/31/9999		I_CF_NCS17	0.01991		0	4
16					8/17/2020		I_CF_NCS17	0.04576		0	10
17					1/10/2021		I_CF_NCS17	0.03797		0	9
18					12/31/9999		I_CF_NCS17	0.0219		0	5
19					6/23/2020		I_CF_NCS17	0.03244		0	7
20					12/31/9999		I_CF_NCS17	0.01254		0	3
21					3/31/2021		I_CF_NCS17	0.02179		0	5
22					12/31/9999		I_CF_NCS17	0.02176		0	5
23					11/10/2020		I_CF_NCS17	0.0178		0	4
24					8/2/2020		I_CF_NCS17	0.02068		0	4
25					12/31/9999		I_CF_NCS17	0.0311		0	7
26					11/1/2020		I_CF_NCS17	0.00894		0	2
27					3/12/2021		I_CF_NCS17	0.01296		0	3
28					12/31/9999		I_CF_NCS17	0.03016		0	7
29					2/25/2021		I_CF_NCS17	0.01989		0	4
30					12/31/9999		I_CF_NCS17	0.03813		0	9
31					12/31/9999		I_CF_NCS17	0.02		0	4
32					4/23/2021		I_CF_NCS17	0.02187		0	5
33					12/31/9999		I_CF_NCS17	0.00538		0	1
34					11/1/2020		I_CF_NCS17	0.00576		0	1

	L	M	N	O	P	Q	R	S	T	U	V	W
1												
2												
3	ALLOCATION			OTHER SUBSCRIPTIONS		END ALLOCATION			ANN_MON RATE			START BILL
4												
5				0		41			4	PDRS_R		4/10/2020
6				0		3			4	PDRS_R		4/10/2020
7				0		9			4	PDRS_R		4/28/2020
8				0		9			11	PDRS_AE		4/22/2020
9				0		3			4	PDRS_R		4/2/2020
10				0		3			4	PDRS_R		4/10/2020
11				0		11			4	PDRS_R		4/7/2020
12				0		2			4	PDRS_R		4/22/2020
13				0		4			2	PDRS_R		4/23/2020
14				0		6			8	PDRS_R		4/7/2020
15				0		4			4	PDRS_R		4/14/2020
16				0		10			8	PDRS_AE		4/21/2020
17				0		9			1	PDRS_R		4/23/2020
18				0		5			4	PDRS_AE		4/21/2020
19				0		7			4	PDRS_AE		4/28/2020
20				0		3			4	PDRS_AE		4/8/2020
21				0		5			4	PDRS_R		4/8/2020
22				0		5			4	PDRS_AE		4/7/2020
23				0		4			10	PDRS_R		4/2/2020
24				0		4			8	PDRS_AE		4/22/2020
25				0		7			4	PDRS_AE		4/8/2020
26				0		2			11	PDRS_R		4/9/2020
27				0		3			3	PDRS_R		4/11/2020
28				0		7			4	PDRS_R		4/14/2020
29				0		4			2	PDRS_R		4/11/2020
30				0		9			4	PDRS_R		4/21/2020
31				0		4			4	PDRS_R		4/7/2020
32				0		5			4	PDRS_R		4/7/2020
33				0		1			4	PDRS_AE		4/21/2020
34				0		1			11	PDRS_R		4/25/2020

May 2020 Report NCS17

Exhibit C-4
Page 3 of 66
Public Version

	X	Y	Z	AA	AB	AC	AD	AE
1								
2								
3		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4								
5		5/11/2020			2020/05		07MC7017	
6		5/11/2020			2020/05		07DC8019	
7		5/27/2020			2020/05		19DC9040	
8		5/20/2020			2020/05		15MC5047	
9		5/1/2020			2020/05		01MC1021	
10		5/11/2020			2020/05		07DC8018	
11		5/6/2020			2020/05		04MC5014	
12		5/20/2020			2020/05		15MC5051	
13		5/21/2020			2020/05		16DC6048	
14		5/6/2020			2020/05		04DC4022	
15		5/13/2020			2020/05		09DC0013	
16		5/19/2020			2020/05		14PG4237	
17		5/21/2020			2020/05		16PG6055	
18		5/19/2020			2020/05		14MC4045	
19		5/27/2020			2020/05		19DC9037	
20		5/7/2020			2020/05		05MC6013	
21		5/7/2020			2020/05		05MC6012	
22		5/6/2020			2020/05		04MC4021	
23		5/1/2020			2020/05		01MC1003	
24		5/20/2020			2020/05		15MC5047	
25		5/7/2020			2020/05		05DC5096	
26		5/8/2020			2020/05		06MC7018	
27		5/12/2020			2020/05		08MC9006	
28		5/13/2020			2020/05		09MC9020	
29		5/12/2020			2020/05		08MC9013	
30		5/19/2020			2020/05		14MC5065	
31		5/6/2020			2020/05		04DC6007	
32		5/6/2020			2020/05		04MC3015	
33		5/19/2020			2020/05		14DC5038	
34		5/26/2020			2020/05		18DC8041	

	A	B	C	D	E	F	G	H	I	J	K
35					1/2/2021		I_CF_NCS17	0.02712		0	6
36					9/30/2020		I_CF_NCS17	0.02126		0	5
37					12/31/9999		I_CF_NCS17	0.0279		0	6
38					12/31/9999		I_CF_NCS17	0.02965		0	7
39					12/31/9999		I_CF_NCS17	0.02043		0	4
40					12/31/9999		I_CF_NCS17	0.00374		0	0
41					12/31/9999		I_CF_NCS17	0.0082		0	1
42					00/00/0000		I_CF_NCS17	0		0	219
43											
44	Subscriber Organization Information										
45											
46		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS		
47											
48		I_CF_NCS17				NCS17					
49		I_CF_NCS17				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V	W
35					0	6					1 PDRS_AE	4/18/2020
36					0	5					10 PDRS_AE	4/7/2020
37					0	6					4 PDRS_AE	4/2/2020
38					0	7					4 PDRS_R	4/8/2020
39					0	4					4 PDRS_AE	4/28/2020
40					0	0				4 PDRS_R		4/15/2020
41					0	1					4 PDRS_R	4/3/2020
42					0	0				0 TOTAL		00/00/0000
43												
44												
45												
46	PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENER	
47												
48			KZD383312641		3/25/2020		4/23/2020	240			0	
49					00/00/0000		00/00/0000	240			219	

	X	Y	Z	AA	AB	AC	AD	AE
35		5/18/2020			2020/05		13MC4039	
36		5/6/2020			2020/05		04DC6008	
37		5/1/2020			2020/05		01MC1003	
38		5/7/2020			2020/05		05MC5030	
39		5/27/2020			2020/05		19DC9037	
40		5/14/2020			2020/05		10MC1047	
41		5/4/2020			2020/05		02MC2004	
42		00/00/0000						
43								
44								
45								
46	UNSUBSCRIBED ENERGY							
47								
48	0							
49	21							

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS19	0.06263		280
6					12/31/9999		I_CF_NCS19	0.05525		247
7					12/31/9999		I_CF_NCS19	0.0163		0
8					2/8/2021		I_CF_NCS19	0.05151		0
9					12/31/9999		I_CF_NCS19	0.10012		496
10					10/5/2020		I_CF_NCS19	0.04595		410
11					6/10/2020		I_CF_NCS19	0.0377		0
12					7/14/2020		I_CF_NCS19	0.04107		366
13					9/2/2020		I_CF_NCS19	0.04355		0
14					12/31/9999		I_CF_NCS19	0.0554		248
15					12/31/9999		I_CF_NCS19	0.06843		0
16					12/31/9999		I_CF_NCS19	0.06243		279
17					12/21/2020		I_CF_NCS19	0.0314		280
18					12/31/9999		I_CF_NCS19	0.11802		528
19					12/31/9999		I_CF_NCS19	0.08873		0
20					12/31/9999		I_CF_NCS19	0.0712		0
21					6/21/2020		I_CF_NCS19	0.05025		450
22					00/00/0000		I_CF_NCS19	0		0
23										
24	Subscriber Organization Information									
25										
26		CREF_OP	VKONT		ANLAGE		SUBSCRIBER ORG		ADDRESS	
27										
28		I_CF_NCS19				NCS19				
29		I_CF_NCS19				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U	V
1												
2												
3	CURRENT ALLOCATION			OTHER SUBSCRIPTIONS			END ALLOCATION		ANN_MONTH		RATE	
4												
5	581			0			861		4		PDRS_R	
6	512			0			759		4		PDRS_R	
7	151			0			151		4		PDRS_R	
8	478			0			478		2		PDRS_AE	
9	929			0			1,425.00		4		PDRS_AE	
10	426			0			836		10		PDRS_AE	
11	349			0			349		6		PDRS_R	
12	381			0			747		7		PDRS_R	
13	404			0			404		9		PDRS_AE	
14	514			0			762		4		PDRS_R	
15	635			0			635		4		PDRS_R	
16	579			0			858		4		PDRS_R	
17	291			0			571		12		PDRS_AE	
18	1,095			0			1,623.00		4		PDRS_R	
19	823			0			823		4		PDRS_R	
20	660			0			660		4		PDRS_R	
21	466			0			916		6		PDRS_AE	
22	9,274			0			0		0		TOTAL	
23												
24												
25												
26		PHONE	EMAIL		METER	START_DT		END_DT		EXCESS_GEN		SUBS_ENE
27												
28					KZD381349721	3/25/2020		4/23/2020		9280		0
29						00/00/0000		00/00/0000		9280		9,274

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	W	X	Y	Z	AA	AB	AC	AD	AE
1									
2									
3	START BILL		END BILL	CREF_CREI	CNM_CREI	BILL YEAR/	COUNTY	PORTION	
4									
5	4/3/2020		5/4/2020			2020/05		02MC2017	
6	4/10/2020		5/11/2020			2020/05		07MC8008	
7	4/10/2020		5/11/2020			2020/05		07MC8011	
8	4/16/2020		5/15/2020			2020/05		11MC2042	
9	4/7/2020		5/6/2020			2020/05		04MC4020	
10	4/7/2020		5/6/2020			2020/05		04MC3015	
11	4/17/2020		5/16/2020			2020/05		12DC3039	
12	4/11/2020		5/12/2020			2020/05		08PG9018	
13	4/22/2020		5/20/2020			2020/05		15MC5051	
14	4/17/2020		5/16/2020			2020/05		12MC2050	
15	4/18/2020		5/18/2020			2020/05		13MC3050	
16	4/7/2020		5/6/2020			2020/05		04MC5016	
17	4/8/2020		5/7/2020			2020/05		05DC5096	
18	4/7/2020		5/6/2020			2020/05		04MC3009	
19	4/17/2020		5/16/2020			2020/05		12MC2051	
20	4/10/2020		5/11/2020			2020/05		07DC8021	
21	4/22/2020		5/20/2020			2020/05		15MC5050	
22	00/00/0000		00/00/0000						
23									
24									
25									
26	R	UNSUBSCRIBED ENERGY							
27									
28		0							
29		6							

	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT
4											
5					12/31/9999		I_CF_NCS1	0.0591		1,171.00	376
6					12/31/9999		I_CF_NCS1	0.1215		8,888.00	774
7					12/31/9999		I_CF_NCS1	0.0813		5,947.00	518
8					8/16/2020		I_CF_NCS1	0.0627		9,168.00	399
9					12/28/2020		I_CF_NCS1	0.0459		2,727.00	292
10					12/31/9999		I_CF_NCS1	0.1027		2,035.00	655
11					12/31/9999		I_CF_NCS1	0.1309		2,596.00	834
12					12/31/9999		I_CF_NCS1	0.06447		783	411
13					12/31/9999		I_CF_NCS1	0.1147		8,390.00	731
14					12/31/9999		I_CF_NCS1	0.1014		3,108.00	646
15					12/31/9999		I_CF_NCS1	0.0278		850	177
16					12/31/9999		I_CF_NCS1	0.067		4,899.00	427
17					00/00/0000		I_CF_NCS1	0		0	6,240
18											
19	Subscriber Organization Information										
20											
21		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS		
22											
23		I_CF_NCS11				NCS11					
24		I_CF_NCS11				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V	W
1												
2												
3	ALLOCATION		OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MON		RATE		START BILL	
4												
5				0		1,547.00			4	PDRS_R		5/8/2020
6				0		9,662.00			4	PDRS_R		5/20/2020
7				0		6,465.00			4	PDRS_R		5/6/2020
8				0		9,567.00			8	PDRS_AE		5/7/2020
9				0		3,019.00			4	PDRS_R		5/28/2020
10				0		2,690.00			4	PDRS_AE		5/17/2020
11				0		3,430.00			4	PDRS_R		5/5/2020
12				0		1,194.00			4	PDRS_R		5/7/2020
13				0		9,121.00			4	PDRS_R		5/29/2020
14				0		3,754.00			4	PDRS_AE		5/20/2020
15				0		1,027.00			4	PDRS_R		5/7/2020
16				0		5,326.00			4	PDRS_R		5/20/2020
17				0		0			0	TOTAL		00/00/0000
18												
19												
20												
21	PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENER	
22												
23			TED352254504		4/24/2020		5/22/2020	6378			0	
24					00/00/0000		00/00/0000	6378			6,240	

	X	Y	Z	AA	AB	AC	AD	AE
1								
2								
3		END BILL	CREF_CREI	CNM_CREI	BILL YEAR/	COUNTY	PORTION	
4								
5		6/5/2020			2020/06		05MC4014	
6		6/18/2020			2020/06		14MC4046	
7		6/3/2020			2020/06		03DC3025	
8		6/4/2020			2020/06		04DC6002	
9		6/25/2020			2020/06		19DC9038	
10		6/16/2020			2020/06		12DC3035	
11		6/2/2020			2020/06		02MC2007	
12		6/4/2020			2020/06		04MC5013	
13		6/26/2020			2020/06		20PG1078	
14		6/18/2020			2020/06		14PG4050	
15		6/4/2020			2020/06		04DC6008	
16		6/18/2020			2020/06		14MC5063	
17		00/00/0000						
18								
19								
20								
21	UNSUBSCRIBED ENERGY							
22								
23	0							
24	138							

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS17	0.17105		41
6					12/31/9999		I_CF_NCS17	0.01443		3
7					12/31/9999		I_CF_NCS17	0.04064		9
8					11/16/2020		I_CF_NCS17	0.03976		18
9					12/31/9999		I_CF_NCS17	0.0146		3
10					12/31/9999		I_CF_NCS17	0.0139		3
11					12/31/9999		I_CF_NCS17	0.0476		11
12					12/31/9999		I_CF_NCS17	0.00925		2
13					2/22/2021		I_CF_NCS17	0.01919		12
14					8/5/2020		I_CF_NCS17	0.0258		18
15					12/31/9999		I_CF_NCS17	0.01991		4
16					8/17/2020		I_CF_NCS17	0.04576		30
17					1/10/2021		I_CF_NCS17	0.03797		27
18					12/31/9999		I_CF_NCS17	0.0219		5
19					6/23/2020		I_CF_NCS17	0.03244		21
20					12/31/9999		I_CF_NCS17	0.01254		3
21					3/31/2021		I_CF_NCS17	0.02179		10
22					12/31/9999		I_CF_NCS17	0.02176		5
23					11/10/2020		I_CF_NCS17	0.0178		12
24					8/2/2020		I_CF_NCS17	0.02068		12
25					12/31/9999		I_CF_NCS17	0.0311		7
26					11/1/2020		I_CF_NCS17	0.00894		6
27					3/12/2021		I_CF_NCS17	0.01296		6
28					12/31/9999		I_CF_NCS17	0.03016		7
29					2/25/2021		I_CF_NCS17	0.01989		8
30					12/31/9999		I_CF_NCS17	0.03813		9
31					12/31/9999		I_CF_NCS17	0.02		4
32					4/23/2021		I_CF_NCS17	0.02187		5
33					12/31/9999		I_CF_NCS17	0.00538		1
34					11/1/2020		I_CF_NCS17	0.00576		3

	K	L	M	N	O	P	Q	R	S	T	U	V
1												
2												
3	CURRENT ALLOCATION				OTHER SUBSCRIPTIONS		END ALLOCATION			ANN_MON RATE		
4												
5	3,858				0		3,899.00			4	PDRS_R	
6	325				0		328			4	PDRS_R	
7	916				0		925			4	PDRS_R	
8	896				0		914			11	PDRS_AE	
9	329				0		332			4	PDRS_R	
10	313				0		316			4	PDRS_R	
11	1,073				0		1,084.00			4	PDRS_R	
12	208				0		210			4	PDRS_R	
13	432				0		444			2	PDRS_R	
14	582				0		600			8	PDRS_R	
15	449				0		453			4	PDRS_R	
16	1,032				0		1,062.00			8	PDRS_AE	
17	856				0		883			1	PDRS_R	
18	494				0		499			4	PDRS_AE	
19	731				0		752			4	PDRS_AE	
20	282				0		285			4	PDRS_AE	
21	491				0		501			4	PDRS_R	
22	490				0		495			4	PDRS_AE	
23	401				0		413			10	PDRS_R	
24	466				0		478			8	PDRS_AE	
25	701				0		708			4	PDRS_AE	
26	201				0		207			11	PDRS_R	
27	292				0		298			3	PDRS_R	
28	680				0		687			4	PDRS_R	
29	448				0		456			2	PDRS_R	
30	860				0		869			4	PDRS_R	
31	451				0		455			4	PDRS_R	
32	493				0		498			4	PDRS_R	
33	121				0		122			4	PDRS_AE	
34	129				0		132			11	PDRS_R	

	W	X	Y	Z	AA	AB	AC	AD	AE
1									
2									
3	START BILL		END BILL	CREF_CRE	CNM_CRE	BILL YEAR/	COUNTY	PORTION	
4									
5	5/12/2020		6/9/2020			2020/06		07MC7017	
6	5/12/2020		6/9/2020			2020/06		07DC8019	
7	5/28/2020		6/25/2020			2020/06		19DC9040	
8	5/21/2020		6/19/2020			2020/06		15MC5047	
9	5/2/2020		6/1/2020			2020/06		01MC1021	
10	5/12/2020		6/9/2020			2020/06		07DC8018	
11	5/7/2020		6/4/2020			2020/06		04MC5014	
12	5/21/2020		6/19/2020			2020/06		15MC5051	
13	5/22/2020		6/22/2020			2020/06		16DC6048	
14	5/7/2020		6/4/2020			2020/06		04DC4022	
15	5/14/2020		6/11/2020			2020/06		09DC0013	
16	5/20/2020		6/18/2020			2020/06		14PG4237	
17	5/22/2020		6/22/2020			2020/06		16PG6055	
18	5/20/2020		6/18/2020			2020/06		14MC4045	
19	5/28/2020		6/23/2020			2020/06		19DC9037	
20	5/8/2020		6/5/2020			2020/06		05MC6013	
21	5/8/2020		6/5/2020			2020/06		05MC6012	
22	5/7/2020		6/4/2020			2020/06		04MC4021	
23	5/2/2020		6/1/2020			2020/06		01MC1003	
24	5/21/2020		6/19/2020			2020/06		15MC5047	
25	5/8/2020		6/5/2020			2020/06		05DC5096	
26	5/9/2020		6/8/2020			2020/06		06MC7018	
27	5/13/2020		6/10/2020			2020/06		08MC9006	
28	5/14/2020		6/11/2020			2020/06		09MC9020	
29	5/13/2020		6/10/2020			2020/06		08MC9013	
30	5/20/2020		6/18/2020			2020/06		14MC5065	
31	5/7/2020		6/4/2020			2020/06		04DC6007	
32	5/7/2020		6/4/2020			2020/06		04MC3015	
33	5/20/2020		6/18/2020			2020/06		14DC5038	
34	5/27/2020		6/24/2020			2020/06		18DC8041	

	A	B	C	D	E	F	G	H	I	J
35					1/2/2021		I_CF_NCS17	0.02712		12
36					9/30/2020		I_CF_NCS17	0.02126		10
37					12/31/9999		I_CF_NCS17	0.0279		6
38					12/31/9999		I_CF_NCS17	0.02965		7
39					12/31/9999		I_CF_NCS17	0.02043		4
40					12/31/9999		I_CF_NCS17	0.00374		0
41					12/31/9999		I_CF_NCS17	0.0082		1
42					00/00/0000		I_CF_NCS17	0		0
43										
44	Subscriber Organization Information									
45										
46		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS	
47										
48		I_CF_NCS17				NCS17				
49		I_CF_NCS17				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U	V
35	611				0		623			1	PDRS_AE	
36	479				0		489			10	PDRS_AE	
37	629				0		635			4	PDRS_AE	
38	668				0		675			4	PDRS_R	
39	460				0		464			4	PDRS_AE	
40	84				0		84			4	PDRS_R	
41	184				0		185			4	PDRS_R	
42	22,115				0		0			0	TOTAL	
43												
44												
45												
46		PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENE
47												
48				KZD383312641		4/24/2020		5/22/2020	22560			0
49						00/00/0000		00/00/0000	22560			22,115

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	W	X	Y	Z	AA	AB	AC	AD	AE
35	5/19/2020		6/17/2020			2020/06		13MC4039	
36	5/7/2020		6/4/2020			2020/06		04DC6008	
37	5/2/2020		6/1/2020			2020/06		01MC1003	
38	5/8/2020		6/5/2020			2020/06		05MC5030	
39	5/28/2020		6/25/2020			2020/06		19DC9037	
40	5/15/2020		6/12/2020			2020/06		10MC1047	
41	5/5/2020		6/2/2020			2020/06		02MC2004	
42	00/00/0000		00/00/0000						
43									
44									
45									
46	R	UNSUBSCRIBED ENERGY							
47									
48		0							
49		445							

	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT
4											
5					12/31/9999		I_CF_NCS19	0.06263		861	551
6					12/31/9999		I_CF_NCS19	0.05525		759	486
7					12/31/9999		I_CF_NCS19	0.0163		151	143
8					2/8/2021		I_CF_NCS19	0.05151		1,434.00	453
9					12/31/9999		I_CF_NCS19	0.10012		1,519.00	881
10					10/5/2020		I_CF_NCS19	0.04595		1,262.00	404
11					6/10/2020		I_CF_NCS19	0.0377		1,047.00	331
12					7/14/2020		I_CF_NCS19	0.04107		1,128.00	361
13					9/2/2020		I_CF_NCS19	0.04355		1,212.00	383
14					12/31/9999		I_CF_NCS19	0.0554		762	487
15					12/31/9999		I_CF_NCS19	0.06843		635	602
16					12/31/9999		I_CF_NCS19	0.06243		858	549
17					12/21/2020		I_CF_NCS19	0.0314		862	276
18					12/31/9999		I_CF_NCS19	0.11802		1,623.00	1,038
19					12/31/9999		I_CF_NCS19	0.08873		823	780
20					12/31/9999		I_CF_NCS19	0.0712		660	626
21					6/21/2020		I_CF_NCS19	0.05025		1,382.00	442
22					00/00/0000		I_CF_NCS19	0		0	8,793
23											
24	Subscriber Organization Information										
25											
26		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS		
27											
28		I_CF_NCS19				NCS19					
29		I_CF_NCS19				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V	W
1												
2												
3	ALLOCATION		OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MONTH		RATE		START BILL	
4												
5			0			1,412.00		4		PDRS_R		5/5/2020
6			0			1,245.00		4		PDRS_R		5/12/2020
7			0			294		4		PDRS_R		5/12/2020
8			0			1,887.00		2		PDRS_AE		5/16/2020
9			0			2,400.00		4		PDRS_AE		5/7/2020
10			0			1,666.00		10		PDRS_AE		5/7/2020
11			0			1,378.00		6		PDRS_R		5/17/2020
12			0			1,489.00		7		PDRS_R		5/13/2020
13			0			1,595.00		9		PDRS_AE		5/21/2020
14			0			1,249.00		4		PDRS_R		5/17/2020
15			0			1,237.00		4		PDRS_R		5/19/2020
16			0			1,407.00		4		PDRS_R		5/7/2020
17			0			1,138.00		12		PDRS_AE		5/8/2020
18			0			2,661.00		4		PDRS_R		5/7/2020
19			0			1,603.00		4		PDRS_R		5/17/2020
20			0			1,286.00		4		PDRS_R		5/12/2020
21			0			1,824.00		6		PDRS_AE		5/21/2020
22			0			0		0		TOTAL		00/00/0000
23												
24												
25												
26	PHONE	EMAIL		METER	START_DT		END_DT		EXCESS_GEN		SUBS_ENER	
27												
28				KZD3813497	4/24/2020		5/22/2020		8800		0	
29					00/00/0000		00/00/0000		8800		8,793	

	X	Y	Z	AA	AB	AC	AD	AE
1								
2								
3		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4								
5		6/2/2020			2020/06		02MC2017	
6		6/9/2020			2020/06		07MC8008	
7		6/9/2020			2020/06		07MC8011	
8		6/15/2020			2020/06		11MC2042	
9		6/4/2020			2020/06		04MC4020	
10		6/4/2020			2020/06		04MC3015	
11		6/10/2020			2020/06		12DC3039	
12		6/10/2020			2020/06		08PG9018	
13		6/19/2020			2020/06		15MC5051	
14		6/16/2020			2020/06		12MC2050	
15		6/17/2020			2020/06		13MC3050	
16		6/4/2020			2020/06		04MC5016	
17		6/5/2020			2020/06		05DC5096	
18		6/4/2020			2020/06		04MC3009	
19		6/16/2020			2020/06		12MC2051	
20		6/9/2020			2020/06		07DC8021	
21		6/21/2020			2020/06		15MC5050	
22		00/00/0000						
23								
24								
25								
26	UNSUBSCRIBED ENERGY							
27								
28	0							
29	7							

	A	B	C	D	E	F	G	H
1	Subscriber Information							
2								
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER
4								
5					12/31/9999		I_CF_NCS10	0.03678
6					9/4/2020		I_CF_NCS10	0.066
7					12/31/9999		I_CF_NCS10	0.15809
8					12/31/9999		I_CF_NCS10	0.0792
9					4/5/2021		I_CF_NCS10	0.0672
10					12/31/9999		I_CF_NCS10	0.06811
11					12/31/9999		I_CF_NCS10	0.06288
12					12/31/9999		I_CF_NCS10	0.02869
13					12/31/9999		I_CF_NCS10	0.0733
14					11/5/2020		I_CF_NCS10	0.06392
15					12/31/9999		I_CF_NCS10	0.05831
16					4/1/2021		I_CF_NCS10	0.05024
17					12/31/9999		I_CF_NCS10	0.1143
18					12/31/9999		I_CF_NCS10	0.0489
19					12/31/9999		I_CF_NCS10	0.07726
20					00/00/0000		I_CF_NCS10	0
21								
22	Subscriber Organization Information							
23								
24		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG		
25								
26		I_CF_NCS10				NCS10		
27		I_CF_NCS10				TOTAL		

	I	J	K	L	M	N	O
1							
2							
3		START ALLOCATION	CURRENT ALLOCATION				OTHER SUBSCRIPTIONS
4							
5		0	303				0
6		1,692.00	543				0
7		1,353.00	1,302				0
8		5,289.00	652				0
9		8,424.00	553				0
10		583	561				0
11		538	518				0
12		0	236				0
13		4,048.00	603				0
14		3,572.00	526				0
15		5,967.00	480				0
16		3,502.00	413				0
17		7,167.00	941				0
18		1,879.00	402				0
19		661	636				0
20		0	8,669				0
21							
22							
23							
24	ADDRESS			PHONE	EMAIL	METER	
25							
26						KZD383312725	
27							

	P	Q	R	S	T	U	V	W	X
1									
2									
3		END ALLOCATION		ANN_MONTH	RATE	START BILL		END BILL	CREF_CREDIT
4									
5		303		6	PDRS_AE	6/19/2020		7/21/2020	
6		2,235.00		9	PDRS_R	6/11/2020		7/13/2020	
7		2,655.00		5	PDRS_AE	6/19/2020		7/21/2020	
8		5,941.00		4	PDRS_R	6/18/2020		7/20/2020	
9		8,977.00		4	PDRS_R	6/12/2020		7/14/2020	
10		1,144.00		5	PDRS_R	6/6/2020		7/8/2020	
11		1,056.00		5	PDRS_AE	6/20/2020		7/22/2020	
12		236		6	PDRS_R	6/19/2020		7/21/2020	
13		4,651.00		4	PDRS_R	6/12/2020		7/14/2020	
14		4,098.00		11	PDRS_R	6/18/2020		7/20/2020	
15		6,447.00		4	PDRS_R	6/17/2020		7/17/2020	
16		3,915.00		4	PDRS_R	6/10/2020		7/10/2020	
17		8,108.00		4	PDRS_AE	6/25/2020		7/27/2020	
18		2,281.00		4	PDRS_AE	6/19/2020		7/21/2020	
19		1,297.00		5	PDRS_R	6/2/2020		7/1/2020	
20		0		0	TOTAL	00/00/0000		00/00/0000	
21									
22									
23									
24	START_DT	END_DT	EXCESS_GEN		SUBS_ENER		UNSUBSCRIBED ENERGY		
25									
26	5/23/2020	6/23/2020	8240		0		0		
27	00/00/0000	00/00/0000	8240		8,669		-429		

	Y	Z	AA	AB
1				
2				
3	CNM_CREDIT	BILL YEAR/MONTH	COUNTY	PORTION
4				
5		2020/07		14MC4046
6		2020/07		08MC9004
7		2020/07		14DC5036
8		2020/07		13DC3053
9		2020/07		09MC0016
10		2020/07		05DC7010
11		2020/07		15MC5049
12		2020/07		14DC5040
13		2020/07		09MC0016
14		2020/07		13MC4040
15		2020/07		12PG3047
16		2020/07		07MC8011
17		2020/07		18PG8049
18		2020/07		14MC4045
19		2020/07		01MC1005
20				
21				
22				
23				
24				
25				
26				
27				

	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT
4											
5					12/31/9999		I_CF_NCS11	0.0591		1,547.00	511
6					12/31/9999		I_CF_NCS11	0.1215		9,662.00	1,051
7					12/31/9999		I_CF_NCS11	0.0813		6,465.00	703
8					8/16/2020		I_CF_NCS11	0.0627		9,966.00	542
9					12/28/2020		I_CF_NCS11	0.0459		3,603.00	397
10					12/31/9999		I_CF_NCS11	0.1027		2,690.00	888
11					12/31/9999		I_CF_NCS11	0.1309		3,430.00	1,132
12					12/31/9999		I_CF_NCS11	0.06447		1,194.00	557
13					12/31/9999		I_CF_NCS11	0.1147		9,121.00	992
14					12/31/9999		I_CF_NCS11	0.1014		3,754.00	877
15					12/31/9999		I_CF_NCS11	0.0278		1,027.00	240
16					12/31/9999		I_CF_NCS11	0.067		5,326.00	579
17					00/00/0000		I_CF_NCS11	0		0	8,469
18											
19	Subscriber Organization Information										
20											
21		CREF_OP	VKONT		ANLAGE		SUBSCRIBER ORG		ADDRESS		
22											
23		I_CF_NCS11				NCS11					
24		I_CF_NCS11				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V	W
1												
2												
3	ALLOCATION			OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MON		RATE		START BILL
4												
5				0		2,058.00			4	PDRS_R		6/6/2020
6				0		10713			4	PDRS_R		6/19/2020
7				0		7,168.00			4	PDRS_R		6/4/2020
8				0		10508			8	PDRS_AE		6/5/2020
9				0		4,000.00			4	PDRS_R		6/26/2020
10				0		3,578.00			4	PDRS_AE		6/17/2020
11				0		4,562.00			4	PDRS_R		6/3/2020
12				0		1,751.00			4	PDRS_R		6/5/2020
13				0		10113			4	PDRS_R		6/27/2020
14				0		4,631.00			4	PDRS_AE		6/19/2020
15				0		1,267.00			4	PDRS_R		6/5/2020
16				0		5,905.00			4	PDRS_R		6/19/2020
17				0		0			0	TOTAL		00/00/0000
18												
19												
20												
21	PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENER	
22												
23			TED352254504		5/23/2020		6/23/2020	8654			0	
24					00/00/0000		00/00/0000	8654			8,469	

	X	Y	Z	AA	AB	AC	AD
1							
2							
3		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION
4							
5		7/8/2020			2020/07		05MC4014
6		7/21/2020			2020/07		14MC4046
7		7/6/2020			2020/07		03DC3025
8		7/7/2020			2020/07		04DC6002
9		7/28/2020			2020/07		19DC9038
10		7/17/2020			2020/07		12DC3035
11		7/2/2020			2020/07		02MC2007
12		7/7/2020			2020/07		04MC5013
13		7/29/2020			2020/07		20PG1078
14		7/21/2020			2020/07		14PG4050
15		7/7/2020			2020/07		04DC6008
16		7/21/2020			2020/07		14MC5063
17		00/00/0000					
18							
19							
20							
21	UNSUBSCRIBED ENERGY						
22							
23	0						
24	185						

	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT A
4											
5					12/31/9999		I_CF_NCS13	0.0834		5,478.00	813
6					12/31/9999		I_CF_NCS13	0.14499		0	1,415
7					12/31/9999		I_CF_NCS13	0.05708		575	557
8					12/31/9999		I_CF_NCS13	0.11457		0	1,118
9					12/31/9999		I_CF_NCS13	0.1477		4,346.00	1,441
10					12/31/9999		I_CF_NCS13	0.1751		11,503.00	1,708
11					12/31/9999		I_CF_NCS13	0.0537		2,211.00	524
12					12/31/9999		I_CF_NCS13	0.00931		380	90
13					1/8/2021		I_CF_NCS13	0.02276		687	222
14					12/31/9999		I_CF_NCS13	0.1199		7,875.00	1,170
15					12/31/9999		I_CF_NCS13	0.0271		1,777.00	264
16					8/30/2020		I_CF_NCS13	0.0415		5,448.00	405
17					00/00/0000		I_CF_NCS13	0		0	9,727
18											
19	Subscriber Organization Information										
20											
21		CREF_OP	VKONT		ANLAGE		SUBSCRIBER ORG		ADDRESS		
22											
23		I_CF_NCS13				NCS13					
24		I_CF_NCS13				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V
1											
2											
3	ALLOCATION			OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MONRATE		START BILL	
4											
5				0		6,291.00		4	PDRS_R	6/25/2020	
6				0		1,415.00		6	PDRS_R	6/13/2020	
7				0		1,132.00		5	PDRS_R	6/17/2020	
8				0		1,118.00		6	PDRS_AE	6/16/2020	
9				0		5,787.00		4	PDRS_AE	6/26/2020	
10				0		13211		4	PDRS_AE	6/16/2020	
11				0		2,735.00		4	PDRS_AE	6/30/2020	
12				0		470		4	PDRS_R	6/25/2020	
13				0		909		1	PDRS_R	6/6/2020	
14				0		9,045.00		4	PDRS_R	6/5/2020	
15				0		2,041.00		4	PDRS_AE	6/6/2020	
16				0		5,853.00		8	PDRS_R	6/25/2020	
17				0		0		0	TOTAL	00/00/0000	
18											
19											
20											
21	PHONE	EMAIL	METER		START_DT	END_DT	EXCESS_GEN		SUBS_ENER		UNSUBSCR
22											
23			KZD383312731		5/23/2020	6/23/2020	9760		0		0
24					00/00/0000	00/00/0000	9760		9,727		33

	W	X	Y	Z	AA	AB	AC
1							
2							
3	END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4							
5	7/27/2020			2020/07		18DC8038	
6	7/15/2020			2020/07		10MC0007	
7	7/17/2020			2020/07		12DC3039	
8	7/16/2020			2020/07		11MC2042	
9	7/28/2020			2020/07		19PG9046	
10	7/16/2020			2020/07		11MC1055	
11	7/30/2020			2020/07		21PG0056	
12	7/27/2020			2020/07		18DC8039	
13	7/8/2020			2020/07		05MC4014	
14	7/7/2020			2020/07		04MC4008	
15	7/8/2020			2020/07		05MC5097	
16	7/27/2020			2020/07		18DC8041	
17	00/00/0000						
18							
19							
20							
21	IBED ENERGY						
22							
23							
24							

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS14	0.0067		372
6					12/31/9999		I_CF_NCS14	0.1861		10,434.00
7					12/31/9999		I_CF_NCS14	0.2999		19,632.00
8					12/31/9999		I_CF_NCS14	0.04265		965
9					12/31/9999		I_CF_NCS14	0.0719		4,030.00
10					12/31/9999		I_CF_NCS14	0.1161		6,508.00
11					4/24/2021		I_CF_NCS14	0.04255		962
12					12/31/9999		I_CF_NCS14	0.0941		5,272.00
13					7/31/2020		I_CF_NCS14	0.0848		14,262.00
14					12/31/9999		I_CF_NCS14	0.02011		109
15					8/29/2020		I_CF_NCS14	0.027		4,533.00
16					00/00/0000		I_CF_NCS14	0		0
17										
18	Subscriber Organization Information									
19										
20		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS	
21										
22		I_CF_NCS14				NCS14				
23		I_CF_NCS14				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U
1											
2											
3	CURRENT ALLOCATION			OTHER SUBSCRIPTIONS		END ALLOCATION			ANN_MON	RATE	
4											
5	90				0		462		4	PDRS_R	
6	2,501				0		12935		4	PDRS_R	
7	4,030				0		23662		5	PDRS_R	
8	573				0		1,538.00		4	PDRS_R	
9	966				0		4,996.00		4	PDRS_R	
10	1,560				0		8,068.00		4	PDRS_R	
11	571				0		1,533.00		4	PDRS_R	
12	1,264				0		6,536.00		4	PDRS_R	
13	1,139				0		15401		8	PDRS_R	
14	270				0		379		5	PDRS_R	
15	362				0		4,895.00		8	PDRS_R	
16	13,326				0		0		0	TOTAL	
17											
18											
19											
20		PHONE	EMAIL	METER		START_DT	END_DT	EXCESS_GEN			SUBS_ENE
21											
22				KZD381349583		5/23/2020	6/23/2020	13440			0
23						00/00/0000	00/00/0000	13440			13,326

	V	W	X	Y	Z	AA	AB	AC	AD
1									
2									
3	START BILL		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4									
5	6/19/2020		7/21/2020			2020/07		14MC4044	
6	6/17/2020		7/17/2020			2020/07		12MC0009	
7	6/9/2020		7/9/2020			2020/07		06MC7021	
8	6/9/2020		7/9/2020			2020/07		06MC8027	
9	6/13/2020		7/15/2020			2020/07		10MC1050	
10	6/17/2020		7/17/2020			2020/07		12MC0009	
11	6/6/2020		7/8/2020			2020/07		05DC7004	
12	6/23/2020		7/23/2020			2020/07		16DC6048	
13	6/23/2020		7/23/2020			2020/07		16PG6049	
14	6/2/2020		7/1/2020			2020/07		01MC1008	
15	6/13/2020		7/15/2020			2020/07		10DC1043	
16	00/00/0000		00/00/0000						
17									
18									
19									
20	R	UNSUBSCRIBED ENERGY							
21									
22		0							
23		114							

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS15	0.0414		2,716.00
6					12/31/9999		I_CF_NCS15	0.1036		6,800.00
7					12/31/9999		I_CF_NCS15	0.04672		463
8					12/31/9999		I_CF_NCS15	0.14512		1,439.00
9					12/31/9999		I_CF_NCS15	0.0173		1,132.00
10					12/31/9999		I_CF_NCS15	0.127		8,336.00
11					12/31/9999		I_CF_NCS15	0.03442		341
12					12/31/9999		I_CF_NCS15	0.35		22,985.00
13					12/31/9999		I_CF_NCS15	0.0359		2,353.00
14					12/1/2020		I_CF_NCS15	0.0367		7,221.00
15					12/31/9999		I_CF_NCS15	0.04631		1,888.00
16					00/00/0000		I_CF_NCS15	0		0
17										
18	Subscriber Organization Information									
19										
20		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS	
21										
22		I_CF_NCS15				NCS15				
23		I_CF_NCS15				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U
1											
2											
3	CURRENT ALLOCATION				OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MONRATE		
4											
5	592				0		3,308.00		4	PDRS_R	
6	1,483				0		8,283.00		4	PDRS_R	
7	669				0		1,132.00		5	PDRS_R	
8	2,078				0		3,517.00		5	PDRS_R	
9	247				0		1,379.00		2	PDRS_R	
10	1,818				0		10154		4	PDRS_AE	
11	492				0		833		5	PDRS_AE	
12	5,012				0		27997		4	PDRS_R	
13	514				0		2,867.00		4	PDRS_R	
14	525				0		7,746.00		12	PDRS_AE	
15	663				0		2,551.00		4	PDRS_AE	
16	14,093				0		0		0	TOTAL	
17											
18											
19											
20		PHONE	EMAIL	METER		START_DT	END_DT	EXCESS_GEN			SUBS_ENE
21											
22				KZD383312727		5/23/2020	6/23/2020	14320			0
23						00/00/0000	00/00/0000	14320			14,093

	V	W	X	Y	Z	AA	AB	AC
1								
2								
3	START BILL		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION
4								
5	6/4/2020		7/6/2020			2020/07		03MC3022
6	6/5/2020		7/7/2020			2020/07		04MC3015
7	6/25/2020		7/27/2020			2020/07		18DC8043
8	6/27/2020		7/29/2020			2020/07		20PG0038
9	6/25/2020		7/27/2020			2020/07		18PG8036
10	6/16/2020		7/16/2020			2020/07		11MC2034
11	6/13/2020		7/15/2020			2020/07		10DC1042
12	6/11/2020		7/13/2020			2020/07		08PG9010
13	6/6/2020		7/8/2020			2020/07		05DC5096
14	6/6/2020		7/8/2020			2020/07		05MC6012
15	6/25/2020		7/27/2020			2020/07		18DC8051
16	00/00/0000		00/00/0000					
17								
18								
19								
20	R	UNSUBSCRIBED ENERGY						
21								
22		0						
23		227						

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS17	0.17105		3,899.00
6					12/31/9999		I_CF_NCS17	0.01443		328
7					12/31/9999		I_CF_NCS17	0.04064		925
8					11/16/2020		I_CF_NCS17	0.03976		1,810.00
9					12/31/9999		I_CF_NCS17	0.0146		332
10					12/31/9999		I_CF_NCS17	0.0139		316
11					12/31/9999		I_CF_NCS17	0.0476		1,084.00
12					12/31/9999		I_CF_NCS17	0.0322		0
13					12/31/9999		I_CF_NCS17	0.00925		210
14					2/22/2021		I_CF_NCS17	0.01919		1,308.00
15					8/5/2020		I_CF_NCS17	0.0258		1,764.00
16					12/31/9999		I_CF_NCS17	0.01991		453
17					8/17/2020		I_CF_NCS17	0.04576		3,126.00
18					1/10/2021		I_CF_NCS17	0.03797		2,595.00
19					12/31/9999		I_CF_NCS17	0.0219		499
20					12/31/9999		I_CF_NCS17	0.01254		285
21					3/31/2021		I_CF_NCS17	0.02179		992
22					12/31/9999		I_CF_NCS17	0.02176		495
23					11/10/2020		I_CF_NCS17	0.0178		1,215.00
24					8/2/2020		I_CF_NCS17	0.02068		1,410.00
25					12/31/9999		I_CF_NCS17	0.0311		708
26					11/1/2020		I_CF_NCS17	0.00894		609
27					3/12/2021		I_CF_NCS17	0.01296		590
28					12/31/9999		I_CF_NCS17	0.03016		687
29					2/25/2021		I_CF_NCS17	0.01989		904
30					12/31/9999		I_CF_NCS17	0.03813		869
31					12/31/9999		I_CF_NCS17	0.02		455
32					4/23/2021		I_CF_NCS17	0.02187		498
33					12/31/9999		I_CF_NCS17	0.00538		122
34					11/1/2020		I_CF_NCS17	0.00576		390

	K	L	M	N	O	P	Q	R	S	T	U	V
1												
2												
3	CURRENT ALLOCATION				OTHER SUBSCRIPTIONS		END ALLOCATION			ANN_MONRATE		
4												
5	5,405				0		9,304.00			4	PDRS_R	
6	455				0		783			4	PDRS_R	
7	1,284				0		2,209.00			4	PDRS_R	
8	1,256				0		3,066.00			11	PDRS_AE	
9	461				0		793			4	PDRS_R	
10	439				0		755			4	PDRS_R	
11	1,504				0		2,588.00			4	PDRS_R	
12	1,017				0		1,017.00			6	PDRS_AE	
13	292				0		502			4	PDRS_R	
14	606				0		1,914.00			2	PDRS_R	
15	815				0		2,579.00			8	PDRS_R	
16	629				0		1,082.00			4	PDRS_R	
17	1,446				0		4,572.00			8	PDRS_AE	
18	1,199				0		3,794.00			1	PDRS_R	
19	692				0		1,191.00			4	PDRS_AE	
20	396				0		681			4	PDRS_AE	
21	688				0		1,680.00			4	PDRS_R	
22	687				0		1,182.00			4	PDRS_AE	
23	562				0		1,777.00			10	PDRS_R	
24	653				0		2,063.00			8	PDRS_AE	
25	982				0		1,690.00			4	PDRS_AE	
26	282				0		891			11	PDRS_R	
27	409				0		999			3	PDRS_R	
28	953				0		1,640.00			4	PDRS_R	
29	628				0		1,532.00			2	PDRS_R	
30	1,204				0		2,073.00			4	PDRS_R	
31	632				0		1,087.00			4	PDRS_R	
32	691				0		1,189.00			4	PDRS_R	
33	170				0		292			4	PDRS_AE	
34	182				0		572			11	PDRS_R	

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	W	X	Y	Z	AA	AB	AC	AD	AE
1									
2									
3	START BILL		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4									
5	6/10/2020		7/10/2020			2020/07		07MC7017	
6	6/10/2020		7/10/2020			2020/07		07DC8019	
7	6/26/2020		7/28/2020			2020/07		19DC9040	
8	6/20/2020		7/22/2020			2020/07		15MC5047	
9	6/2/2020		7/1/2020			2020/07		01MC1021	
10	6/10/2020		7/10/2020			2020/07		07DC8018	
11	6/5/2020		7/7/2020			2020/07		04MC5014	
12	6/6/2020		7/8/2020			2020/07		05MC6015	
13	6/20/2020		7/22/2020			2020/07		15MC5051	
14	6/23/2020		7/23/2020			2020/07		16DC6048	
15	6/5/2020		7/7/2020			2020/07		04DC4022	
16	6/12/2020		7/14/2020			2020/07		09DC0013	
17	6/19/2020		7/21/2020			2020/07		14PG4237	
18	6/23/2020		7/23/2020			2020/07		16PG6055	
19	6/19/2020		7/21/2020			2020/07		14MC4045	
20	6/6/2020		7/8/2020			2020/07		05MC6013	
21	6/6/2020		7/8/2020			2020/07		05MC6012	
22	6/5/2020		7/7/2020			2020/07		04MC4021	
23	6/2/2020		7/1/2020			2020/07		01MC1003	
24	6/20/2020		7/22/2020			2020/07		15MC5047	
25	6/6/2020		7/8/2020			2020/07		05DC5096	
26	6/9/2020		7/9/2020			2020/07		06MC7018	
27	6/11/2020		7/13/2020			2020/07		08MC9006	
28	6/12/2020		7/14/2020			2020/07		09MC9020	
29	6/11/2020		7/13/2020			2020/07		08MC9013	
30	6/19/2020		7/21/2020			2020/07		14MC5065	
31	6/5/2020		7/7/2020			2020/07		04DC6007	
32	6/5/2020		7/7/2020			2020/07		04MC3015	
33	6/19/2020		7/21/2020			2020/07		14DC5038	
34	6/25/2020		7/27/2020			2020/07		18DC8041	

	A	B	C	D	E	F	G	H	I	J
35					1/2/2021		I_CF_NCS17	0.02712		1,234.00
36					9/30/2020		I_CF_NCS17	0.02126		968
37					12/31/9999		I_CF_NCS17	0.0279		635
38					12/31/9999		I_CF_NCS17	0.02965		675
39					12/31/9999		I_CF_NCS17	0.02043		464
40					12/31/9999		I_CF_NCS17	0.00374		84
41					12/31/9999		I_CF_NCS17	0.0082		185
42					00/00/0000		I_CF_NCS17	0		0
43										
44	Subscriber Organization Information									
45										
46		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS	
47										
48		I_CF_NCS17				NCS17				
49		I_CF_NCS17				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U	V
35	856				0		2,090.00			1	PDRS_AE	
36	671				0		1,639.00			10	PDRS_AE	
37	881				0		1,516.00			4	PDRS_AE	
38	936				0		1,611.00			4	PDRS_R	
39	645				0		1,109.00			4	PDRS_AE	
40	118				0		202			4	PDRS_R	
41	259				0		444			4	PDRS_R	
42	30,985				0		0			0	TOTAL	
43												
44												
45												
46		PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENE
47												
48				KZD383312641		5/23/2020		6/23/2020	31600			0
49						00/00/0000		00/00/0000	31600			30,985

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	W	X	Y	Z	AA	AB	AC	AD	AE
35	6/18/2020		7/20/2020			2020/07		13MC4039	
36	6/5/2020		7/7/2020			2020/07		04DC6008	
37	6/2/2020		7/1/2020			2020/07		01MC1003	
38	6/6/2020		7/8/2020			2020/07		05MC5030	
39	6/26/2020		7/28/2020			2020/07		19DC9037	
40	6/13/2020		7/15/2020			2020/07		10MC1047	
41	6/3/2020		7/2/2020			2020/07		02MC2004	
42	00/00/0000		00/00/0000						
43									
44									
45									
46	R	UNSUBSCRIBED ENERGY							
47									
48		0							
49		615							

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS18	0.14761		1,601.00
6					12/31/9999		I_CF_NCS18	0.17251		1,871.00
7					12/31/9999		I_CF_NCS18	0.06941		753
8					12/31/9999		I_CF_NCS18	0.15059		1,634.00
9					12/31/9999		I_CF_NCS18	0.04661		505
10					12/31/9999		I_CF_NCS18	0.065		704
11					12/31/9999		I_CF_NCS18	0.20289		2,201.00
12					8/25/2020		I_CF_NCS18	0.1086		2,354.00
13					12/31/9999		I_CF_NCS18	0.0368		399
14					00/00/0000		I_CF_NCS18	0		0
15										
16	Subscriber Organization Information									
17										
18		CREF_OP	VKONT		ANLAGE		SUBSCRIBER ORG		ADDRESS	
19										
20		I_CF_NCS18				NCS18				
21		I_CF_NCS18				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U	V
1												
2												
3	CURRENT ALLOCATION			OTHER SUBSCRIPTIONS			END ALLOCATION			ANN_MONRATE		
4												
5	1,384				0		2,985.00			4 PDRS_R		
6	1,618				0		3,489.00			4 PDRS_R		
7	651				0		1,404.00			4 PDRS_AE		
8	1,412				0		3,046.00			4 PDRS_R		
9	437				0		942			4 PDRS_R		
10	609				0		1,313.00			4 PDRS_R		
11	1,903				0		4,104.00			4 PDRS_R		
12	1,018				0		3,372.00			8 PDRS_R		
13	345				0		744			4 PDRS_R		
14	9,377				0		0			0 TOTAL		
15												
16												
17												
18		PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENE
19												
20				TED363736105		5/23/2020		6/23/2020	9382			0
21						00/00/0000		00/00/0000	9382			9,377

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	W	X	Y	Z	AA	AB	AC	AD	AE
1									
2									
3	START BILL		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4									
5	6/11/2020		7/13/2020			2020/07		08PG9002	
6	6/6/2020		7/8/2020			2020/07		05MC5019	
7	6/6/2020		7/8/2020			2020/07		05MC4002	
8	6/9/2020		7/9/2020			2020/07		06MC5010	
9	6/5/2020		7/7/2020			2020/07		04MC5015	
10	6/30/2020		7/30/2020			2020/07		21PG1075	
11	6/3/2020		7/2/2020			2020/07		02MC2012	
12	6/10/2020		7/10/2020			2020/07		07MC8008	
13	6/6/2020		7/8/2020			2020/07		05MC4016	
14	00/00/0000		00/00/0000						
15									
16									
17									
18	R	UNSUBSCRIBED ENERGY							
19									
20		0							
21		5							

	A	B	C	D	E	F	G	H	I	J	K
1	Subscriber Information										
2											
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL	CURRENT
4											
5					12/31/9999		I_CF_NCS14	0.0067		462	91
6					12/31/9999		I_CF_NCS14	0.1861		12,935.00	2,530
7					12/31/9999		I_CF_NCS14	0.2999		23,662.00	4,078
8					12/31/9999		I_CF_NCS14	0.04265		1,538.00	580
9					12/31/9999		I_CF_NCS14	0.0719		4,996.00	977
10					12/31/9999		I_CF_NCS14	0.1161		8,068.00	1,578
11					4/24/2021		I_CF_NCS14	0.04255		1,533.00	578
12					12/31/9999		I_CF_NCS14	0.0941		6,536.00	1,279
13					12/31/9999		I_CF_NCS14	0.02011		379	273
14					8/29/2020		I_CF_NCS14	0.027		5,619.00	367
15					00/00/0000		I_CF_NCS14	0		0	12,331
16											
17	Subscriber Organization Information										
18											
19		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS		
20											
21		I_CF_NCS14				NCS14					
22		I_CF_NCS14				TOTAL					

	L	M	N	O	P	Q	R	S	T	U	V
1											
2											
3	ALLOCATION			OTHER SUBSCRIPTIONS		END ALLOCATION		ANN_MONRATE			START BILL
4											
5				0		553		4	PDRS_R		7/22/2020
6				0		15465		4	PDRS_R		7/18/2020
7				0		27740		5	PDRS_R		7/10/2020
8				0		2,118.00		4	PDRS_R		7/10/2020
9				0		5,973.00		4	PDRS_R		7/16/2020
10				0		9,646.00		4	PDRS_R		7/18/2020
11				0		2,111.00		4	PDRS_R		7/9/2020
12				0		7,815.00		4	PDRS_R		7/24/2020
13				0		652		5	PDRS_R		7/2/2020
14				0		5,986.00		8	PDRS_R		7/16/2020
15				0		0		0	TOTAL		00/00/0000
16											
17											
18											
19	PHONE	EMAIL	METER		START_DT	END_DT	EXCESS_GEN			SUBS_ENER	
20											
21			KZD381349583		6/24/2020	7/24/2020	13600			0	
22					00/00/0000	00/00/0000	13600			12,331	

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	W	X	Y	Z	AA	AB	AC	AD
1								
2								
3		END BILL	CREF_CREF	CNM_CREF	BILL YEAR/	COUNTY	PORTION	
4								
5		8/20/2020			2020/08		14MC4044	
6		8/18/2020			2020/08		12MC0009	
7		8/10/2020			2020/08		06MC7021	
8		8/10/2020			2020/08		06MC8027	
9		8/14/2020			2020/08		10MC1050	
10		8/18/2020			2020/08		12MC0009	
11		8/7/2020			2020/08		05DC7004	
12		8/24/2020			2020/08		16DC6048	
13		8/3/2020			2020/08		01MC1008	
14		8/14/2020			2020/08		10DC1043	
15		00/00/0000						
16								
17								
18								
19	UNSUBSCRIBED ENERGY							
20								
21		0						
22		1,269						

	A	B	C	D	E	F	G	H	I	J
1	Subscriber Information									
2										
3		VKONT		ANLAGE	MOVE OUT DATE		CREF_OP	SUBS_PER		START ALL
4										
5					12/31/9999		I_CF_NCS18	0.14761		2,985.00
6					12/31/9999		I_CF_NCS18	0.17251		3,489.00
7					12/31/9999		I_CF_NCS18	0.06941		1,404.00
8					12/31/9999		I_CF_NCS18	0.15059		3,046.00
9					12/31/9999		I_CF_NCS18	0.04661		942
10					12/31/9999		I_CF_NCS18	0.065		1,313.00
11					12/31/9999		I_CF_NCS18	0.20289		4,104.00
12					8/25/2020		I_CF_NCS18	0.1086		4,390.00
13					12/31/9999		I_CF_NCS18	0.0368		744
14					00/00/0000		I_CF_NCS18	0		0
15										
16	Subscriber Organization Information									
17										
18		CREF_OP	VKONT		ANLAGE	SUBSCRIBER ORG			ADDRESS	
19										
20		I_CF_NCS18				NCS18				
21		I_CF_NCS18				TOTAL				

	K	L	M	N	O	P	Q	R	S	T	U	V
1												
2												
3	CURRENT ALLOCATION			OTHER SUBSCRIPTIONS			END ALLOCATION			ANN_MON RATE		
4												
5	1,378				0		4,363.00			4	PDRS_R	
6	1,610				0		5,099.00			4	PDRS_R	
7	648				0		2,052.00			4	PDRS_AE	
8	1,406				0		4,452.00			4	PDRS_R	
9	435				0		1,377.00			4	PDRS_R	
10	606				0		1,919.00			4	PDRS_R	
11	1,894				0		5,998.00			4	PDRS_R	
12	1,014				0		5,404.00			8	PDRS_R	
13	343				0		1,087.00			4	PDRS_R	
14	9,334				0		0			0	TOTAL	
15												
16												
17												
18		PHONE	EMAIL	METER		START_DT		END_DT	EXCESS_GEN			SUBS_ENE
19												
20				TED363736105		6/24/2020		7/24/2020	9338			0
21						00/00/0000		00/00/0000	9338			9,334

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	W	X	Y	Z	AA	AB	AC	AD	AE
1									
2									
3	START BILL		END BILL	CREF_CREI	CNM_CREI	BILL YEAR/	COUNTY	PORTION	
4									
5	7/14/2020		8/12/2020			2020/08		08PG9002	
6	7/9/2020		8/7/2020			2020/08		05MC5019	
7	7/9/2020		8/7/2020			2020/08		05MC4002	
8	7/10/2020		8/10/2020			2020/08		06MC5010	
9	7/8/2020		8/6/2020			2020/08		04MC5015	
10	7/31/2020		8/31/2020			2020/08		21PG1075	
11	7/3/2020		8/4/2020			2020/08		02MC2012	
12	7/11/2020		8/11/2020			2020/08		07MC8008	
13	7/9/2020		8/7/2020			2020/08		05MC4016	
14	00/00/0000		00/00/0000						
15									
16									
17									
18	R	UNSUBSCRIBED ENERGY							
19									
20		0							
21		4							

	A	B	C	D	E	F	G
1	Operand	Contract Account	Subscriber Organization	Address	Meter	Start Date	End Date
2	I_CF_NCS16		NCS16		KZD381349582	7/25/2020	8/25/2020
3							
4	Total Excess Generation	Subscribed Energy	Unsubscribed Energy				
5	13600	11583	2017				

	H
1	Excess Generation
2	13600
3	
4	
5	

Account Number	Move Out Date	CREF_OP	SUBS_PER	CURRENT ALLOCATION	OTHER SUBSCRIPTIONS
	11/23/2020	I_CF_NCS16	5.93%	806 0	
	12/31/9999	I_CF_NCS16	4.70%	639 0	
	12/31/9999	I_CF_NCS16	5.31%	722 0	
	12/31/9999	I_CF_NCS16	12.47%	1,695 0	
	12/31/9999	I_CF_NCS16	1.94%	264 0	
	12/31/9999	I_CF_NCS16	2.99%	406 0	
	12/31/9999	I_CF_NCS16	14.33%	1,948 0	
	12/31/9999	I_CF_NCS16	7.67%	1,042 0	
	12/31/9999	I_CF_NCS16	4.08%	555 0	
	12/31/9999	I_CF_NCS16	8.21%	1,116 0	
	12/31/9999	I_CF_NCS16	17.58%	2,390 0	

ANN_MONTH	RATE	START BILL	END BILL	TARIFF RATE	BILL CREDIT
4	PDRS_R	8/28/2020	9/28/2020		
4	PDRS_R	8/8/2020	9/8/2020		
4	PDRS_R	8/13/2020	9/11/2020		
4	PDRS_AE	8/22/2020	9/22/2020		
4	PDRS_R	8/22/2020	9/22/2020		
4	PDRS_AE	8/22/2020	9/22/2020		
4	PDRS_R	8/5/2020	9/2/2020		
4	PDRS_R	8/8/2020	9/8/2020		
4	PDRS_R	8/8/2020	9/8/2020		
4	PDRS_AE	8/7/2020	9/4/2020		
4	PDRS_R	8/4/2020	9/1/2020		

Allocation Legend

ACCOUNT NUMBER

MOVE OUT DATE

CREF_OP

SUBS_PER

CURRENT ALLOCATION

OTHER SUBSCRIPTIONS

ANN_MONTH

RATE

START BILL

END BILL

TARIFF RATE

BILL CREDIT

11-Digit Subscriber account number

The date the subscriber moved out; subscribers that have not moved out will show 12/31/9999

Community Renewable Energy Facility Operand ID - Used for billing purposes

% allocation of facility generation allocated to the subscriber; sum of allocations for each group operand may not e

Kilowatt-hours received during the current bill cycle

% allocation from other CREF/CSGES facilities that the subscribers may have subscribed to

refers to the Anniversary month that subscriber started receiving credits

Subscriber Rate Class

Dates bounding the current billing cycle for each subscriber

CREF/CSEGS Credit Rate per kilowatt-hour (\$/kWh)- this rate changes monthly driven by the Rate Class

Total credit amount for current billing cycle (calculated by multiplying the CURRENT%_ALLOCATION by the CREF/C:

exceed 100%

SEGS CREDIT RATE

Operand	Contract Account	Subscriber Organization	Address
I_CF_NCS16	[REDACTED]	NCS16	[REDACTED]

Total Excess Generation	Subscribed Energy	Unsubscribed Energy
10720	9130	1590

Meter	Start Date	End Date	Excess Generation
KZD381349582	08/26/2020	09/24/2020	10720

Account Number	Move Out Date	CREF_OP	SUBS_PER	CURRENT ALLOCATION	OTHER SUBSCRIPTIONS
	11/23/2020	I_CF_NCS16	5.933%	636	0
	12/31/9999	I_CF_NCS16	4.701%	503	0
	12/31/9999	I_CF_NCS16	5.313%	569	0
	12/31/9999	I_CF_NCS16	12.467%	1336	0
	12/31/9999	I_CF_NCS16	1.944%	208	0
	12/31/9999	I_CF_NCS16	2.989%	320	0
	12/31/9999	I_CF_NCS16	14.326%	1535	0
	12/31/9999	I_CF_NCS16	7.669%	822	0
	12/31/9999	I_CF_NCS16	4.083%	437	0
	12/31/9999	I_CF_NCS16	8.213%	880	0
	12/31/9999	I_CF_NCS16	17.579%	1884	0

ANN_MONTH	RATE	START BILL	END BILL	TARIFF RATE	BILL CREDIT
4	PDRS_R	9/29/2020	10/27/2020		
4	PDRS_R	9/9/2020	10/7/2020		
4	PDRS_R	9/12/2020	10/12/2020		
4	PDRS_AE	9/23/2020	10/21/2020		
4	PDRS_R	9/23/2020	10/21/2020		
4	PDRS_AE	9/23/2020	10/21/2020		
4	PDRS_R	9/3/2020	10/2/2020		
4	PDRS_R	9/9/2020	10/7/2020		
4	PDRS_R	9/9/2020	10/7/2020		
4	PDRS_AE	9/5/2020	10/6/2020		
4	PDRS_R	9/2/2020	10/1/2020		

	A
1	Allocation Legend
2	ACCOUNT NUMBER
3	MOVE OUT DATE
4	CREF_OP
5	SUBS_PER
6	CURRENT ALLOCATION
7	OTHER SUBSCRIPTIONS
8	ANN_MONTH
9	RATE
10	START BILL
11	END BILL
12	TARIFF RATE
13	BILL CREDIT

	B
1	
2	11-Digit Subscriber account number
3	The date the subscriber moved out; subscribers that have not moved out will show 12/31/9999
4	Community Renewable Energy Facility Operand ID - Used for billing purposes
5	% allocation of facility generation allocated to the subscriber; sum of allocations for each group operand may
6	Kilowatt-hours received during the current bill cycle
7	% allocation from other CREF/CSGES facilities that the subscribers may have subscribed to
8	refers to the Anniversary month that subscriber started receiving credits
9	Subscriber Rate Class
10	Dates bounding the current billing cycle for each subscriber
11	
12	CREF/CSEGS Credit Rate per kilowatt-hour (\$/kWh)- this rate changes monthly driven by the Rate Class
13	Total credit amount for current billing cycle (calculated by multiplying the CURRENT%_ALLOCATION by the CR

	C	D	E
1			
2			
3			
4			
5	not exceed 100%		
6			
7			
8			
9			
10			
11			
12			
13	EF/CSEGS CREDIT RATE		

Audience: Customers we have already billed

Subject line: Your community solar billing is set to resume

Dear %%firstname%%

In August, we notified you that Pepco was experiencing delays in sending reports of Community Net Metering credits issued to Pepco customers. As a result, we have been unable to send you bills for the bill credits that appeared on your electricity bills during the summer months.

Pepco resolved its reporting issues, and we will resume billing for your community solar credits next week. The solar production and credit period that you will be billed for is 07/25/2020 - 08/25/2020.

Please take a minute to review your [community solar account](#) to ensure your payment preference is up-to-date. If you are enrolled in e-billing, we will send you both an electronic and paper copy of your invoice.

Your next CleanChoice Energy community solar bill may be for credits earned over multiple periods. Please make sure you refer to the solar production periods and bill message on your community solar bill as we will extend the bill due date.

If you have any questions, our Customer Care team is ready to help. Please call us at %%CSPhoneNumber%% or email us at billingsupport@cleanchoiceenergy.com.

Sincerely,

Your CleanChoice Energy Community Solar Team

Audience: First Time bill customers

Subject line: Important information about your first CleanChoice Energy community solar bill

Dear %firstname%%

Thanks for participating in CleanChoice Energy community solar. Earlier this summer, Pepco was experiencing delays in sending reports of Community Net Metering credits issued to Pepco customers. As a result, we have been unable to send you bills for the bill credits that appeared on your electricity bills this summer.

We're writing to let you know that your first CleanChoice Energy community solar bill will be sent to you next week. This bill is for the Community Net Metering credits that appeared on your Pepco electricity bill from the period 07/25/2020 - 08/25/2020. We will send you both an electronic and paper copy of your bill.

Your next CleanChoice Energy community solar bill may be for credits earned over multiple periods. Please make sure you refer to the solar production periods and bill message on your community solar bill as we will extend the bill due date.

If you have any questions, our Customer Care team is ready to help. Please call us at %%CSPhoneNumber%% or email us at billingsupport@cleanchoiceenergy.com.

Sincerely,

Your CleanChoice Energy Community Solar Team

Audience: Active Simba customers and District Solar customers

Subject line: Reminder: your community solar bill is coming soon

Dear %firstname%%,

This is a reminder that your next community solar bill will be sent to you this week. Pepco has resolved its reporting issues and we are now able to bill for your back-dated Community Net Metering credits. Your upcoming community solar bill will be for two solar production and credit periods: 4/24/20-5/22/20 and 5/23/20- 6/23/20. We anticipate you will receive one more bill for multiple credit periods in January.

Please take a minute to review your [community solar account](#) to ensure your payment preference and bill delivery method is up-to-date.

To help you understand how you can see savings between your electricity bills and your community solar bills, please refer to [this explainer](#).

If you have any questions, our Customer Care team is ready to help. Please call us at %%CSPhoneNumber%% or email us at billingsupport@cleanchoiceenergy.com.

Sincerely,

Your CleanChoice Energy Community Solar Team

Audience: Cancelled Simba customers and District Solar customers

Subject line: An upcoming community solar bill for outstanding bill credits

Dear %firstname%%,

We are writing to inform you about an upcoming community solar bill you will receive this week. This summer, Pepco experienced reporting issues that prevented CleanChoice from billing you for Community Net Metering credits. Pepco has resolved its reporting issues and we will be sending you a bill for back-dated Community Net Metering credits. Although we have processed your cancellation, you are still responsible for paying for the credits you earned while you were a community solar customer.

This bill will be for two solar production and credit periods: 4/24/20-5/22/20 and 5/23/20-6/23/20. You may receive one more bill for multiple credit periods in January.

The amount of your invoice reflects a 10% savings to the value of the credits that were already applied to your Pepco account. Please refer to your electric bills from this period.

If you have any questions, our Customer Care team is ready to help. Please call us at %%CSPhoneNumber%% or email us at billingsupport@cleanchoiceenergy.com.

Sincerely,

Your CleanChoice Energy Community Solar Team

EMAIL MESSAGE

Subject Line: Important information about your June community solar bill

Body:

Dear %firstname%,

We are writing to inform you that last year, Pepco experienced a billing error that miscalculated Community Net Metering credits issued to Pepco customers between the months of June and November. As a result, you may see additional charges or credits issued to you in your invoice set for June 10, 2021.

We understand that this billing error may cause inconvenience or confusion for you. Our Customer Care team is ready to answer your questions and concerns you may have. Please call us at 1-800-270-9001.

Thank you for your understanding and for participating in CleanChoice Energy Community Solar. Through your support, you are furthering the production of 100% clean, pollution-free solar energy in your region.

Sincerely,

Your CleanChoice Energy Community Solar team

BILL MESSAGE

Please be aware that your CleanChoice Energy solar bill might have additional charges or credits due to a reporting error from Pepco DC between the dates of 6/1/2020 and 11/1/2020. If you have any questions, our Customer Care team is ready to help. Please call us at 1-800-270-9001 or email us at billingsupport@cleanchoiceenergy.com.

Please note that your CleanChoice Energy bill might have additional charges or credits due to a reporting error from Pepco DC between the dates of 6/1/2020-11/1/2020. For any questions, please email or call us at 1-800-270-9001.

September 16, 2020

Via E-Mail

Matthew Segers
Andrea Harper
Office of General Counsel
Potomac Electric Power Company (PEPCO)
Edison Place
701 Ninth Street, N.W.
Washington D.C. 20068

Subject: PEPCO and Delmarva Delays in Monthly Reporting of CSEGS Bill Credits

Dear Mr. Segers and Ms. Harper:

We are writing this letter concerning ongoing operational issues stemming from the failure of the Pepco Holding utilities to follow their obligations laid out under COMAR 20.62 for the Maryland Community Solar Pilot Program and in D.C. Code §§ 34-1501(15) and 34-1518. Specifically, this letter is in response to PEPCO and Delmarva's (collectively, "the PHI Utilities") delays in correctly crediting subscribers and providing monthly credit allocation reports to Subscriber Organizations and their partner customer management firms ("Community Solar Providers" or "Providers") and related issues in the provided online portal.

Background on the Portal and Monthly Reports

At the end of last year, the PHI Utilities launched a new, online platform for Community Solar Providers to manage subscribers to operating Community Solar Energy Generating Systems ("CSEGS") in Maryland and Community Renewable Energy Facilities ("CREFs") in DC. Two primary components of the platform are:

1. Subscriber Organizations are required to submit the percent of CSEGS and CREF production allocated to each subscriber to the PHI Utilities via the portal so that they can credit the subscriber for allocated production on PEPCO or Delmarva bills ("Allocation Schedule"). Subscriber Organizations are permitted under COMAR and DC Code to update Allocation Schedules as subscriber enrollment in projects change over time (for example, if an initial subscriber moves out of the utility service area, and replacement subscriber(s) are identified).
2. At the end of each bill cycle (approximately every month), the PHI Utilities utilize provided customer allocations in the portal to assign credits to subscribers. The PHI Utilities then generate a credit allocation report ("Report") for the Subscriber Organization to confirm the amount of credits generated by the Community Solar Provider and prepare the appropriate invoices to charge the subscribers for these credits. Having accurately and timely credit allocation reports is critical to Providers' ability to accurately bill subscribers and to collect associated revenue.

Summary of Delays in Maryland

Since the PHI Utilities launched the portal, there have been frequent and regular delays in the PHI Utilities processing the updated Allocation Schedules submitted via the portal. The result is that some subscribers

receive incorrect credits on their utility bills. If a subscriber has cancelled their subscription agreement, they still receive credits if PEPCO or Delmarva has not processed the latest allocation schedule, yet the Subscriber Organization has no contractual right to bill the subscriber since the subscription contract has already been cancelled. If the subscriber has closed their PEPCO or Delmarva account (for example, if moving outside of the service area), then the Subscriber Organization does not receive full monetary for the credit, which is compensated by the PHI Utilities at a lower rate than the value of the credit applied to a subscriber utility bill. If a new subscriber, the subscriber does not receive credits. And if a percentage change to reflect current enrollment, then the subscriber receives the incorrect quantity of credits. In essence, the delays in processing Allocation Schedule updates submitted via the portal prevents the Subscriber Organization from delivering under contractual commitments to subscribers. Akin to a third-party order fulfillment vendor not processing orders by shipping product to the ordering customer, the PHI Utilities are failing in their order fulfillment by blocking Subscriber Organizations from delivering bill credits to rate payers/customers though the sun is shining and CSEGS/CREFs are producing credits (or is wrongly sending credits to non-subscribers who have no obligation to pay).

In the last six months there have been two significant delays concerning the delivery of Reports for projects in Maryland. On April 6, 2020, PEPCO communicated via email that it was “experiencing some technical issues with the generation of the monthly credit allocation report” which led to a month-long delay in providing a Report to Subscriber Organizations. The issue was finally resolved and monthly credit allocation reports for two months of production were received on April 30, 2020.

However, PEPCO again failed to deliver an allocation report in July 2020, stating on July 17 via an email notice that:

“...We are experiencing some technical issues with the generation of the monthly credit allocation report. We recently completed the release of a billing system upgrade which adversely impacted the allocation reporting process. Our development team is aware of the issue and is working diligently to restore system functionality. We will update you by July 25th, with the latest information if the issue has not been resolved...”

Following multiple requests for further information, PEPCO once again indicated that no additional information could be provided and that a timeline for resolving the issue was unclear. To this day, there has been no additional update from PEPCO on a timeline to fix the issue causing the Subscriber Organization to miss at least three Reports in this most recent occurrence.

The PHI Utilities’ failure to provide accurate and timely Reports is a violation of their obligations under COMAR 20.62 and associated tariff filings. PEPCO and Delmarva’s lack of transparency regarding their plans to resolve this issues and failure to provide updates, including a timeline for resolution of this issues is also likely a violation of these obligations, but at a minimum it is uncollaborative and harmful to the Community Solar Providers and subscribers.

Summary of Delays in DC

While the delays experienced in Maryland are unacceptable, the issues with some DC CREFs are even more egregious. In DC, at least one CREF that achieved Authorization To Operate (“ATO”) in September 2019 was never properly integrated into PEPCO’s billing system and has not provided any generation data to this day. In turn, subscribers to this CREF have not been allocated the generated credits. Community

Solar Providers have not received any Reports for CREFS that achieved ATO in February and April 2020. In the past several months, due to issues with the automated billing system, PEPCO has failed to provide Subscriber Organizations and their Community Solar Providers with any allocation data whatsoever. Making matters even worse, PEPCO has not confirmed whether subscribers to these CREFs have or have not been receiving monthly bill credit allocations on their utility bills. Multiple questions and requests for information from Community Solar Providers results in either no response from PEPCO representatives or responses that are so vague the information is essentially meaningless. Consider this explanation offered via email:

"The information we received was the billing issues that impacted the monthly allocation reports may have also resulted in the Community Solar credits being omitted from the subscribers' monthly billing statements. Adjustments have been made to many of the affected accounts, with credits for the missed billing periods appearing on the July billing statement."

This communication lacks important detail, including which customers and projects were impacted, which accounts have been adjusted, and which accounts are still suffering from ongoing issues. PEPCO operational staff may be providing the information they have available, but that does not excuse the obligation for PEPCO to adhere to the established regulatory and tariff requirements. Some customers have affirmatively reached out to Community Solar Providers and shared copies of a letter from PEPCO or copies of their bills, so it seems that by anecdotal evidence, PEPCO has started crediting customers for July and August. However, it is untenable that Community Solar Providers should have to rely on customers to obtain information about PEPCO's billing practices.

PEPCO's failure to provide accurate and timely Reports is a violation of its obligations under D.C. Code §§ 34-1501(15) and 34-1518 and associated tariff filings. PEPCO's failure to answer basic questions such as whether customers have been receiving bill credits or to provide a timeline for resolution of these issues is further harming Community Solar Providers and ratepayer/subscribers.

Negative Impacts on Customers, Community Solar Providers and Community Solar Program

These delays continue to present significant operational and financial challenges for Community Solar Providers and threaten the success of the CSEGS and CREF Programs. Customers deserve a predictable experience that is consistent with Maryland and DC regulations and PEPCO and Delmarva's own tariff and community solar program requirements. Subscriber Organizations are unable to deliver credits to subscribers, or the wrong utility customer incorrectly receive credits, if PEPCO and Delmarva do not allocate credits per Allocation Schedules submitted by Community Solar Providers. Next, Community Solar Providers are unable to bill subscribers for credits delivered when that month's credit allocation report is missing, as it is unable to verify the volume of credits that each subscriber actually received. These delays continue to impede regular issuance of bills to subscribers. Further, once the late Reports are provided, Subscriber Organizations must back-bill customers for missing months putting subscribers in the position of having to pay several months of credits at the same time. This is unfair to customers and makes it difficult, if not impossible, to reconcile the large, lump sum invoice with the credits that may have been received on multiple previous utility bills. This creates confusion in the CSEGS and CREF programs and may result in customers cancelling their community solar subscription agreements. Community Solar Providers are faced with "no-win" options – attempting to retain subscribers despite the fact that they are unable to deliver the expected customer experience, enforce contractual terms like early termination or cancellation fees that further erode the customer experience, or be forced to incur additional expenses

and allocate additional resources to preserve the customer relationship or to replace customers who cancel. The failure of the PHI Utilities to meet their obligations is extremely problematic.

In addition, the Subscriber Organizations' themselves rely on these regular cash inflows from subscribers to operate these facilities. Regular disruptions and delays in project revenue due to utility errors will discourage investment in the Maryland and DC Community Solar Programs, thereby impeding both Maryland and DC from advancing their policy goals regarding solar access and renewable energy development.

Currently, across all the signatories on this letter, there are 27 projects totaling 19.2 MWdc in capacity, **with more than \$675,000 in estimated credits impacted**. Clearly, the current delay in delivering two monthly Reports is resulting in significant cash flow issues.

Proposed Resolution

As an alternative to a formal filing at the MD and DC Commissions, we jointly request the following resolutions that we feel are both reasonable and feasible for the PHI Utilities to execute in light of these delays and portal difficulties.

1. **Transparent Notification:** If and when issues arise which could delay or impede the successful credit allocation to subscribers and/or reporting to Subscriber Organizations, the PHI Utilities shall communicate a detailed description of the issue within two (2) business days so that Subscriber Organizations can properly communicate the delay to subscribers. Additionally, the PHI Utilities shall communicate an expected timeline for resolution that is no more than thirty (30) days so that Subscriber Organizations can communicate with their partners and subscribers accordingly and prepare for revenue delay.
2. **Manual Data Entry or Processing of Allocation Schedules:** if a technical issue prevents the PHI Utilities from using the portal to process updated Allocation Schedules for a billing cycle, then the PHI Utilities shall allocate resources necessary to manually process the updates as was done before the portal was launched.
3. **Manual Data Entry of Reports:** If the generation of a credit allocation report is delayed for more than ten (10) business days, the PHI Utilities shall allocate resources necessary to produce manual reports. If subscribers are receiving credits on their bills, then both the allocation list and amount of credits delivered to customers are known and should be made available to Community Solar Providers, even if such information is manually reported.
4. **Immediate Integration and Back Allocation of Outstanding CREFs in DC:** Any project in the District of Columbia that has achieved Authorization to Operate and has yet to be integrated into PEPCO's billing system shall be integrated within five (5) business days of receipt of this letter. In so doing, energy generated according to the Subscriber Organization's Revenue Grade Meter ("RGM") must be allocated and back dated.
5. **Confirmation of Customer Communications:** The PHI Utilities shall provide Subscriber Organizations with a sample copy of all customer notices, letters, or other communications that have been provided to community solar customers in DC and in Maryland relating to community solar billing from the period January 1, 2020 to present. Going forward, such notices shall be

provided to all Subscriber Organizations or posted to a publicly available website no later than the same day that such notices are sent to customers. This will ensure that Subscriber Organizations and Community Solar Providers are aware of the information that the PHI Utilities share with customers and can be better prepared to manage the customer experience and answer customer questions regarding billing.

We hope to find a timely resolution to these issues without having to resort to formal redress at the Maryland or DC PSC. If PEPCO is unwilling or unable to engage in informal efforts to resolve these issues continue to persist, we will escalate accordingly. We look forward to your response.

Please direct all communications related to this letter to David Beugelmans, Esq. by e-mail at dbeugelmans@gfrlaw.com or phone at (410) 576-4104.

Regards,

/s/
Jennifer Spinosi
General Counsel and SVP - Regulatory and
Compliance
CleanChoice Energy Community
Impacted projects in DC and Maryland

/s/
Mike Healey
CEO
New Columbia Solar
Impacted projects in DC

/s/
Kelly Friend
Vice President, Policy and Regulatory Affairs
Nexamp
Impacted projects in Maryland

/s/
Jessica Pitts
Principal
Flywheel Development LLC

/s/
Stephen J. Raeder, II
Chief Executive Officer
Summit Ridge Energy
Impacted project in Maryland

/s/
Bryan Eckstein
VP, Project Finance and Business Development
Forefront Power
Impacted projects in Maryland

/s/
Gary Skulnik
CEO
Neighborhood Sun Benefit Corp
Impacted projects in Maryland

/s/
Joel Gamoran
General Manager, Community Solar
Arcadia
Impacted projects in Maryland

/s/
Corey Ramsden
VP, Go Solar Programs
Solar United Neighbors*

*SUN is a non-profit consumer advocate supportive of the requests in this letter, but is not a subscriber organization or community solar provider and therefore is not directly impacted by billing issues.

Matthew K. Segers
Assistant General Counsel

EP9628
701 Ninth Street NW
Washington, DC 20068-0001

Office 202.872.3484
Fax 202.331.6767
pepcoholdings.com
mksegers@pepcoholdings.com

October 20, 2020

Via E-Mail

David W. Beugelmans
Gordon Feinblatt LLC
233 East Redwood Street
Baltimore, Maryland 21202

Subject: Response to September 16, 2020 Communication Regarding PEPCO and Delmarva Monthly Reporting of CSEGS Bill Credits

Dear Mr. Beugelmans:

Thank you for contacting us on September 16, 2020 regarding the concerns your clients have relating to delays by Potomac Electric Power Company (“Pepco”) and Delmarva Power & Light Company (“Delmarva Power”) (collectively, “the PHI Utilities”) in crediting community solar subscribers and providing monthly credit allocation reports to Subscriber Organizations and their partner customer management firms (“Community Solar Providers” or “Providers”). This letter is intended to respond to the concerns detailed in your September 16, 2020 communication as well as to document our phone discussion held on October 5, 2020.

Regarding the first issue raised in your communication, the PHI Utilities have worked hard to resolve the community solar subscription crediting issue and affected customers were properly credited by the end of the September billing cycle. In addition, as we discussed during the October 5 phone call, please find attached as Attachment A copies of the 60-Day Billing Error Report that Pepco filed with the Public Service Commission of the District of Columbia (“DC PSC”) relating to the crediting delays, as well as copies of communications Pepco sent to customers relating to the crediting delays. A listing of the Pepco contract accounts by Subscriber Organization for impacted subscribers in the District and Maryland will be delivered to each Subscriber Organization individually due to customer information disclosure laws.

As for the monthly credit allocation reports to Subscriber Organizations, the PHI Utilities note that there is no legal requirement in either the District or Maryland that utilities provide such reports to Community Solar Providers. However, in an effort to foster good relations and for the convenience of the Subscriber Organizations and to support our

customers, the PHI Utilities will continue the provision of such reports. As discussed on the October 5 call, the PHI Utilities are currently in the process of implementing the necessary changes so that Community Solar Providers will receive accurate reports in a timely manner. The PHI Utilities anticipate being able to do production runs and testing of the reporting fixes and may need to do some additional enhancements or programming in October after the testing. However, the PHI Utilities expect that the issues with the crediting reports will be resolved by the end of October, in time to provide the September credit allocation report. The PHI Utilities have determined that the July and August 2020 will be able to be provided by the end of October as well. Additionally, the PHI Utilities do not have an automated process to specifically identify the billing corrections on the monthly reports, but we will continue to investigate options on this issue.

Finally, the PHI Utilities have reviewed the five resolution proposals detailed in your September 16 communication. As discussed in the October 5 call, the PHI Utilities are willing to communicate with Subscriber Organizations when there are community solar crediting issues that will delay the credit allocation to multiple subscribers or substantial delays in the credit reporting to Subscriber Organizations. While the PHI Utilities cannot commit to a specific deadline for notifying Subscriber Organizations of such issues, we will commit to do so in a reasonable time after any such issue is identified and understood. The PHI Utilities are also willing to provide to Subscriber Organizations certain communications regarding the issue and its resolution, such as billing error reports that are filed with the DC PSC or a sample of the notification letters that are sent to customers. However, the PHI Utilities cannot provide all communications because some are automatically posted on bills or otherwise not accessible except through providing individual customer bills or information. Moreover, the PHI Utilities cannot agree to do any manual data entry due to the administrative burden that it would cause – the PHI Utilities use an automated program to produce the monthly report for the prior month. In the event that there is ever another issue that delays the issuance of the monthly subscriber allocation reports, the PHI Utilities do have the ability to manually adjust the program to generate the monthly reports in order to produce delayed reports for a previous month.

Please let us know if you have any questions or would like to discuss further. As we discussed, the PHI Utilities are scheduling a check-in call for the week of October 19 to update you and the Subscriber Organizations regarding the status of the monthly subscription allocation reporting correction process.

Sincerely,

Matthew K. Segers

Matthew K. Segers
Assistant General Counsel

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Energy Renewable
Facility Practices**

§
§
§
§
§
§

Formal Case No. _____

AFFIDAVIT OF MS. ERIN LARSEN

I. INTRODUCTION & QUALIFICATIONS

1. My name is Erin Larsen, and I am the Director of Asset Management at New Columbia Solar.
2. I am submitting this affidavit to address New Columbia Solar's experience with the Community Renewable Energy Facilities ("CREF") program in the District of Columbia.
3. New Columbia Solar develops, finances, owns, and operates rooftop, canopy, and ground-mounted solar projects located on commercial, industrial, multi-family, non-profit, and faith-based properties across the District of Columbia and Maryland.
4. Founded in 2016, New Columbia Solar has grown to be one of the largest and most comprehensive solar energy companies in Washington, D.C. with a mission to power every home and business in our nation's capital with solar energy. Our team of experts is responsible for delivering more than 25MW of solar in the District by way of 250 projects across all eight wards.
5. New Columbia Solar owns and manages more than \$100 million worth of D.C.-based solar energy assets throughout the city. We pride ourselves on using solar energy to provide

increased cash flow and financial flexibility to more than 100 schools, nonprofits, and residential building owners across the District.

6. New Columbia Solar was one of the first CREF developers in D.C. and has participated in the Solar for All CREF program since its inception, along with developing a number of market rate CREFs. Roughly 130 of New Columbia Solar's projects are CREFs, accounting for over 14MW of capacity.
7. I have been working in the energy industry for six years and have been working with CREF interconnection since 2021. I oversee the financial management and operations and maintenance of New Columbia Solar's operational fleet.
8. I have worked directly with Potomac Electric Power Company ("Pepco") Distribution Engineering on CREF billing issues and the maintenance of the solar systems.
9. My resume is attached to this Affidavit as Exhibit D-1. A list of New Columbia Solar's CREF projects also included as an attachment as Exhibit D-2.
10. This affidavit and the accompanying exhibits were prepared by me or under my direct supervision and control.

II. SUMMARY OF AFFIDAVIT & FINDINGS

11. My affidavit can be summarized as follows:

- Every CREF developed, installed, and interconnected by New Columbia Solar has both (a) a revenue grade production meter installed by New Columbia Solar that is used to record generation output in PJM's Generation Attribute Tracking System and (b) a Pepco installed and owned meter that measures generation and is used for the allocation of generation that is used to determine the subscribers (i.e. the end

use customer's) CREF credits. We receive reports from Pepco monthly with the account and meter numbers for the Pepco owned generation meters.

- The installation of Pepco owned meters has led to delays in interconnection.
- Pepco has repeatedly misallocated and delayed the allocation of generation.
- The misallocation and delays in allocation of generation appear to be due to problems in Pepco's metering and billing systems.
- The misallocation and delay in allocation of generation has led to lost or delayed revenue for New Columbia Solar.
- The misallocation and delays in allocation of generation has also impacted our partners and their subscribers leading to delayed compensation and mistrust of the program.

III. DISCUSSION

A. Pepco-Installed and Owned Meters

12. New Columbia Solar installs, owns and operates a revenue grade meter at every CREF we have developed.

13. Pepco has installed its proprietary meters at all of our market rate and Solar for All CREFs.

This was a condition of receiving ATO. There was no additional charge for the meter, though there is an application fee of \$500 per project and a fee for interconnection and distribution system upgrades for CREFs. Exhibit D-2 provides a list of Pepco meter numbers, and for each meter the authorization to operate dates as the meters were installed before these dates.

14. Pepco uses its proprietary meter readings to record and allocate generation.

B. Meter Discrepancies

15. We have observed meter discrepancies in CREF NCS11 in September and October of 2019.
16. The discrepancy resulted in a dramatic under reporting of generation on the Pepco owned meter.
17. It is an onerous task for New Columbia Solar to examine each and every CREF monthly allocation report from Pepco against the CREF's revenue grade metering data. We ask that the Commission direct an audit of all generation allocation reports from Pepco be analyzed against the data collected by the CREF's revenue grade metering.

C. Improper Billing

18. We receive bills monthly for all of our market rate CREFs. A redacted copy is attached as an example as Exhibit D-3.

D. Unsubscribed Energy

19. New Columbia Solar received and deposited checks from Pepco for unsubscribed energy in the amounts and dates below for the following accounts:
 - a. 50025433819 – NCS26, \$19,751.62, deposited on 2/4/2022.
 - b. 50019789721 – AREM, \$565.05, deposited on 1/24/2022.

E. Discussion with Pepco

20. We routinely notify Pepco when we identify a discrepancy or error in Pepco's allocation report.
21. Additionally, New Columbia Solar and eight other impacted community solar companies sent a letter addressed to Pepco's Office of General Counsel on September 16, 2020, which is attached to Mr. St. Louis's Affidavit as Exhibit C-6. The letter expressed concern for the ongoing community solar operational issues stemming from the failure of Pepco to follow

obligations laid out under COMAR 20.62 for the Maryland Community Solar Pilot Program and D.C. Code §§ 34-1501(15) and 34-1518 for CREFs in the District of Columbia.

22. On October 5, 2020, industry representatives spoke with Pepco over the phone to talk through the issues highlighted in the September 16 letter.
23. On October 20, 2020, Pepco sent a letter to the industry representatives as a follow up to the October 5 call, which is attached to Mr. St. Louis' Affidavit as Exhibit C-7. In the letter, Pepco noted that they expect that the issues with the crediting reports will be resolved by the end of October 2020, in time to provide the September credit allocation report. However, as outlined above, this issue was not fully resolved until April 29, 2021 - six months later.
24. In October and November of 2021, the Department of Energy and Environment ("DOEE") organized three meetings with Pepco staff and industry members to talk through many of the issues. Several representatives from New Columbia Solar participated in these meetings.
25. Two issues were resolved as a result of these meetings (i.e. Batch functionality and increasing the frequency of enrollment add/drop periods to a monthly basis), a majority of the issues flagged for Pepco remain unresolved.
26. Pepco staff shared that they plan to begin working on the enhancement plan in Q2 or Q3 of 2022. Pepco has not given a timeline for the actual roll-out of the enhancement plan. Given the long timelines of other technological updates, industry members could reasonably assume that the system integration between the Community Solar Portal

(“CSP”) and billing system and other system improvements won’t roll out until 2023 or 2024.

27. Pepco noted that interim solutions are being explored prior to system integration with CSP and the billing systems, and that they don’t have any other information to share at this point. Unfortunately, Pepco has not offered any short-term or temporary fixes at this point, meaning that these issues will persist until the enhancement plan is rolled out.

28. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No. _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: _____ Erin Larsen _____

Signature: Erin Larsen

Date: _____ 3/16/2022 _____

ERIN LARSEN

Washington, District of Columbia
elarsen0311@gmailcom • 704-806-2016 • [linkedin.com/in/erinlarsen/](https://www.linkedin.com/in/erinlarsen/)

WORK EXPERIENCE

New Columbia Solar – Washington, DC

March 2021 – Present

Director of Asset Management

- Responsible for the administration of Asset Management and Operations and Maintenance services for 221 C&I interconnection locations (102 projects) located within the District of Columbia
- Oversaw completion of back-levered debt facility compliance, audits, and income tax return preparation
- Implemented cash flow forecasting for tax-equity funds to support liquidity tracking

Cypress Creek Renewables – Santa Monica, CA

June 2016 – March 2021

Associate Director of Asset Management (April 2020 – March 2021)

- Oversaw team operations as the most senior member of the Asset Management group which was responsible for the management of 2.4 GW of utility-scale solar
- Lead the pricing, negotiation, and contracting for third-party asset management services including the execution of a \$600k/yr, 194 MW contract
- Worked on the deal team for a 7-year, \$200 million debt facility taken out on the operating fleet
- Presented at board meetings, investor pitches, and audit committee meetings

Senior Asset Manager (June 2017 – April 2020)

- Oversaw the operations of 42 utility-scale solar farms (585 MWdc) in 15 tax equity portfolios located in 8 states with 9 off-takers
- Trained and on-boarded 8 analysts and 2 interns
- Spearheaded the automation of team processes including monthly revenue validations, invoicing, production report generation, and monthly site lease payment requests
- Collaborated with investment banker on the creation of a corporate model

Asset Manager (June 2016 – June 2017)

- Oversaw the on-boarding and ongoing management of newly placed-in-service distributed generation solar portfolios as a founding member of the Cypress Creek Asset Management Team
- Acquired ability to understand and execute the commercial and financial operations of lease-pass-throughs, partnership-flips, and sale-lease back tax equity structures
- Created the quarterly and annual financial reporting package implemented across all operational assets
- Monitored third-party O&M providers in their performance of preventative and corrective maintenance

Roberts Environmental Center – Claremont, CA

September 2012 – May 2016

Student Manager of the Environmental Governance and Best Practice Research Team

- Worked with ArcGIS mapping technology and large research databases to determine the relationship between water pricing structures and water consumption behavior in California
- Partnered with the Los Angeles Council for Watershed Health to develop a holistic report card to assess the health and management of the Los Angeles River

EDUCATION

Claremont McKenna College, Claremont, CA

May 2016

Bachelor of Environment, Economics, and Politics (EEP)

- **Awards:** Bill and Melinda Gates Foundation Interdisciplinary Science Scholar Ship (ISS), Class of 2016 Sports Hall of Fame, 2016 SCIAC Women's Lacrosse First-Team All-Conference, Conference Scholar Athlete 2016
- **Experiences:** Claremont-Mudd-Scripps NCAA Division 3 Women's Lacrosse Team, Admissions Office Tour Guide, Student Government Environmental Concerns Committee, Wilderness Orientation Leader (3x)

INTERESTS AND SKILLS

- **Skills:** Microsoft Excel (advanced), stakeholder management, investor relations, process development, contract review and negotiation, public speaking, tax-equity compliance management, asset optimization
- **Interests:** Volunteering at local animal shelter, attending music festivals and live concerts, traveling, and practicing yoga

CREF Short Name	Address	System Size (kWp DC)	System Size (kWp AC)	ATO Received	CREF Account Number	CREF Meter Number
NCS01		26.18	23.9	9/28/18		NXA116028233
NCS02		26.18	23.9	9/28/18		NXA108156863
NCS03		26.18	23.9	9/28/18		NXA116053670
NCS04		23.12	20.7	9/28/18		NXA116058565
NCS05		81.36	75	10/5/18		KZD341192094
NCS06		61.2	52.2	11/21/18		X8D341181528
NCS07		26.18	23.9	10/3/18		NXA114401087
NCS08		53.72	43.2	11/19/18		TED36376130
NCS09		30.15	23.4	12/28/18		TED363533585
NCS10		85.56	72	9/6/19		KZD383312725
NCS11		61.64	52.2	3/5/19		TED352254504
NCS13		89.7	72	9/6/19		KZD383312731
NCS14		82.8	72	9/6/19		KZD381349583
NCS15		89.01	72	9/6/19		KZD383312727
NCS16		93.84	72	9/6/19		KZD381349582
NCS17		214.74	166.6	3/17/20		KZD383312641
NCS18		63	52.2	9/6/19		TED363736105
NCS19		94.32	86.4	3/3/20		KZD381349721
NCS21		291.18	266.67	12/4/20		KZD350746898
NCS22		180.44	183.3	12/4/20		KZD351934948
NCS23		46.8	43.2	3/2/21		TED385387389
NCS24		15.12	14.4	3/5/21		TED385387211
NCS25		18.72	14.4	3/2/21		TED385387390
NCS26		1,029.24	800	3/26/21		KZD387055907



Your electric bill - Oct 2019
for the period September 27, 2019 to October 25, 2019

Exhibit D-3
Public Version

WAYS TO SAVE: FIND TIPS AND PROGRAMS THAT HELP

Learn more at pepco.com/WaysToSave

NEW COLUMBIA SOLAR

Account number: [REDACTED]
Your service address: [REDACTED]
WASHINGTON [REDACTED]
Bill Issue date: Oct 28, 2019 - **PAST DUE NOTICE**

Summary of your charges

Balance from your last bill	\$16.68
Changes to your electric balance	\$0.16
Balance forward as of Oct 28, 2019	\$16.84
New electric distribution charges - Pepco	\$14.62
New electric supply charges - SOS Provider	\$2.06
Pepco	
Total amount due by Nov 18, 2019	\$33.52

After Nov 18, 2019, a Late Payment Charge of \$0.39 will be added, increasing the amount due to \$33.91.

A past due amount of \$16.68 remained on your account at the time your bill was prepared. If payment has been made, please disregard this notice. For bill payment options, visit www.pepco.com.

Visit pepco.com/dctariffs and click "DC Terms and Conditions" for information on how payments are applied to balances from Pepco and any competitive supplier.

Your smart electric meter is read wirelessly. Visit My Account at pepco.com to view your daily and hourly energy usage.

If you are moving or discontinuing service, please contact Pepco at least three days in advance.

How to contact us

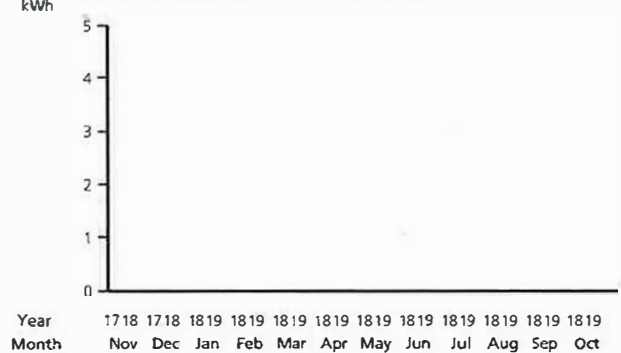
Customer Service (Mon-Fri, 7am - 8 pm) **202-833-7500**
TTY English **1-800-643-3768**
TTY Spanish **1-800-546-7111**
¿Problemas con la factura? **202-833-7500**
Electric emergencies & outages (24 hours) **1-877-737-2662**
Visit pepco.com for service, billing and correspondence information.

Pepco is regulated by - DC Public Service Commission, dcpsc.org
1325 G St NW, Suite 800, Washington DC 20005, 202-626-5100

Consumer Advocate - Office of People's Counsel, opc-dc.gov
1133 Fifteenth St NW, Washington DC 20005, 202-727-3071

Your monthly Electricity use in kWh

Daily temperature averages: Oct 2019: 65° F



Please tear on the dotted line below. Invoice Number: 200811063542 Page 1 of 3

Return this coupon with your payment
made payable to Pepco

PAST DUE NOTICE

Account number [REDACTED]
Total amount due by Nov 18, 2019 **\$33.52**
Total amount due after Nov 18, 2019 **\$33.91**

1000159 01 AV 0.360 **AUTO TI 0 4258 20002-702899 -C02-P00159-112
2DR07891



NEW COLUMBIA SOLAR
401 NEW YORK AVENUE NE
WASHINGTON DC 20002-7028

Amount
Paid:

\$ [REDACTED]

PO BOX 13608
PHILADELPHIA PA 19101



700001500200347940000000000016840000000016680000000033520017

NEW COLUMBIA SOLAR

Account number: [REDACTED]

Your electric bill for the period
September 27, 2019 to October 25, 2019

Details of your Electric Charges

Residential-R - service number [REDACTED]
Electricity you used this period

Meter Number Energy Type	Current Reading	Previous Reading	Difference	Multiplier	Total Use
[REDACTED]	Oct 25	Sep 27			
Use (kWh)	000000 (actual)	000000 (actual)	0	80	0

Your next meter reading is scheduled for November 25, 2019

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 29 days, **summer rates in effect.**

Electric Summary	
Balance from your last bill	\$16.68
Late Payment Charge	\$0.16
Changes to electric balance	\$0.16
Electric Charges (Residential-R)	\$16.68
New electric charges	\$16.68
Total amount due by Nov 18, 2019	\$33.52

Type of charge	How we calculate this charge	Amount(\$)
Distribution Services:		
Customer Charge		15.09
Exelon Base Rate Credit		1.37-
Administrative Credit	0 kWh X \$0.0008925- per kWh	0.00
Subtotal (Set by DC PSC)		13.72
Sales Tax	at 6%	0.90
Subtotal (Not set by DC PSC)		0.90
Total Electric Delivery Charges		14.62

Customer Service Centers

Washington DC
701 Ninth St NW (Mon - Fri) 8:30am - 5:15pm
2300 Martin Luther King Jr Ave SE (Mon - Fri) 9:00am - 5:00pm

Maryland
201 West Gude Dr, Rockville (Mon - Fri) 10:00am - 2:00pm
8300 Old Marlboro Pk, Forestville (Mon, Wed, Fri) 10:00am - 2:00pm

Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

NEW COLUMBIA SOLAR

Account number: [REDACTED]

Your electric bill for the period

September 27, 2019 to October 25, 2019

Exhibit D-3

Public Version

Supply Charges: These charges reflect the cost of producing electricity for you.
You can compare this part of your bill to offers from competitive suppliers.
Based on billed use, your average annual price to compare is 7.01 cents per kwh.

Billing Period: Sep 27, 2019 to Oct 25, 2019 (29 days)

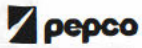
<u>Type of charge</u>	<u>How we calculate this charge</u>	<u>Amount(\$)</u>
Transmission Services: Transmission Minimum Charge	Includes First 30 kWh	0.12
Generation Services: Generation Minimum Charge	Includes First 30 kWh	1.82
Sales Tax	at 6%	0.12
Total Electric Supply Charges		2.06
Total Electric Charges - Residential-R		16.68

Energy Usage History

	Oct 18	Nov 18	Dec 18	Jan 19	Feb 19	Mar 19	Apr 19	May 19	Jun 19	Jul 19	Aug 19	Sep 19	Oct 19
Temp	62°	47°	43°	37°	41°	47°	62°	70°	76°	82°	79°	76°	65°
Days	31	30	31	31	28	31	30	31	30	31	19	30	29
kWh	0	0	0	0	0	0	0	0	0	0	0	0	0

Information regarding rate schedules and how to verify the accuracy of your bill will be mailed upon request.

Follow us on Twitter at twitter.com/PepcoConnect. Like us on Facebook at facebook.com/PepcoConnect.



An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

PAGE: 1

PAYMENT SUMMARY

VENDOR NO:
VOUCHER NO:

VOUCHER DATE: 01/13/22

REF. DOC.	REFERENCE NUMBER	REF. DATE	DOCUMENT AMOUNT	DISCOUNT/ADJ AMOUNT	NET AMOUNT
INVOICE		01/13/22	565.05	0.00	565.05
TOTALS:			565.05	0.00	565.05

(Detach Here)



An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

62-4/311

CHECK DATE
01/13/2022

CHECK NUMBER
[REDACTED]

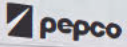
PAY...FIVE HUNDRED SIXTY FIVE DOLLARS 05 CENTS

TO
THE
ORDER
OF:

VALID FOR 365 DAYS

\$*****565.05

THE BANK OF NEW YORK MELLON
PHILADELPHIA, PA



An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

Exhibit D-4
Page 2 of 2



PAGE: 1

PAYMENT SUMMARY

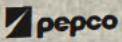
VENDOR NO:
VOUCHER NO:



VOUCHER DATE: 01/19/22

REF. DOC.	REFERENCE NUMBER	REF. DATE	DOCUMENT AMOUNT	DISCOUNT/ADJ AMOUNT	NET AMOUNT
INVOICE		01/19/22	19,751.62	0.00	19,751.62
		TOTALS:	19,751.62	0.00	19,751.62

Detach Here

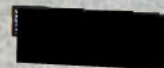


An Exelon Company
Potomac Electric Power Company
701 9th St NW
EP1804-EP 1st Fl, NE
Washington, DC 20001

62-4/311

PAY...NINETEEN THOUSAND SEVEN HUNDRED FIFTY ONE DOLLARS 62 CENTS

CHECK DATE
01/19/2022



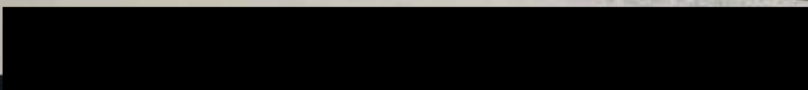
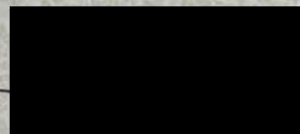
TO
THE
ORDER
OF:



VALID FOR 365 DAYS

\$***19,751.62

THE BANK OF NEW YORK MELLON
PHILADELPHIA, PA



Public Version

Subject: FW: [EXTERNAL]FW: Pepco Checks-[REDACTED]-AREM.. [REDACTED]-NCS26
Date: Monday, February 7, 2022 at 9:09:53 AM Eastern Standard Time
From: [REDACTED] (PEPCO)
To: [REDACTED]
CC: [REDACTED] (PHI)
Attachments: image001.png, image002.jpg, image003.png, image004.png, image005.png

Hi [REDACTED],

This is the breakdown of the checks you received. They are for unsubscribed energy.

I hope this helps!

[REDACTED] – AREM:
 Check should have been 568.41 but some how, only 565.05 was sent.
 They still have a credit of 3.36 on account.

2020		Credit Feb	Credit Mar	Credit Apr	Credit May	Credit Jun	Credit Jul	Credit Aug	Credit Sep
I_CF_AREM	Unsub KWH	[REDACTED]							
	Credit	[REDACTED]							
2021		Credit Feb	Credit Mar	Credit Apr	Credit May	Credit Jun	Credit Jul	Credit Aug	Credit Sep
I_CF_AREM	Unsub KWH	[REDACTED]							
	Credit	[REDACTED]							

[REDACTED] NCS26:

2021		Credit Feb	Credit Mar	Credit Apr	Credit May	Credit Jun	Credit Jul	Credit Aug	Credit Sep
I_CF_NCS26	Unsub KWH	[REDACTED]							
	Credit	[REDACTED]							

Thank you,

[REDACTED]
 [REDACTED]
 [REDACTED]@exeloncorp.com
 [REDACTED]



exeloncorp.com

From: [REDACTED]@newcumbiasolar.com>
Sent: Wednesday, February 2, 2022 5:22 PM
To: [REDACTED]@pepcoholdings.com>; [REDACTED]@pepco.com>;
[REDACTED]@exeloncorp.com>
Cc: [REDACTED]@pepcoholdings.com>; [REDACTED]
[REDACTED]@exeloncorp.com>; [REDACTED]pepcoholdings.com>
[REDACTED]@exeloncorp.com>
Subject: [EXTERNAL]FW: Pepco Checks
Importance: High

EXTERNAL MAIL. Do not click links or open attachments from unknown senders or unexpected Email.

Hello Pepco billing teams,

We received the checks attached. Can you please let us know what they are for?

@ [REDACTED] (PHI)@ [REDACTED] (PEPCO) Are these for unsubscribed energy from Market Rate CREFs?
If so, is there a break down of these allocations? Thank you.



[REDACTED]
New Columbia Solar

[REDACTED] | [REDACTED]@newcumbiasolar.com

From: [REDACTED]@newcumbiasolar.com>
Date: Wednesday, February 2, 2022 at 12:46 PM
To: [REDACTED]@newcumbiasolar.com>
Subject: Pepco Check

[REDACTED]
New Columbia Solar

[REDACTED]@newcumbiasolar.com

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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§
§
§
§

Formal Case No. _____

AFFIDAVIT OF MATTHEW FALLON

I. INTRODUCTION & QUALIFICATIONS

1. My name is Matthew Fallon. I am over the age of 21 and otherwise competent to make this affidavit.
2. My address is: [BEGIN CONFIDENTIAL] [REDACTED].
[END CONFIDENTIAL] My telephone number is: [BEGIN CONFIDENTIAL] [REDACTED]. [END CONFIDENTIAL].
3. I am a subscriber with the District of Columbia's community solar program and am enrolled with CleanChoice Energy from December 2018 to June 2021.
4. My spouse, Samantha Fallon, is a current employee of CleanChoice Energy.
5. I am submitting this affidavit to address my own experience with the Community Renewable Energy Facilities (CREF) program in the District of Columbia.
6. This affidavit was prepared by me or under my direct supervision and control.

II. SUMMARY OF AFFIDAVIT & FINDINGS

7. I have experienced many issues with participating in the community solar program. Multiple times my solar credits were not applied to my Pepco bill for several months in a

row. Because I gave up tracking every utility bill and trying to match that back to my CleanChoice bill, I only noticed when CleanChoice billed me for multiple months-worth of credits at the same time, causing me to owe a much higher monthly bill than I'd been prepared for. While I understand that savings occur over time, this lumpiness in my expected monthly bills negates the positive proposition of savings.

8. I don't trust that I am seeing annual savings at the end of the day. It's confusing enough to try to match credit periods to invoice periods that are billed in arrears, but when those timelines are further skewed it's nearly impossible. When I first signed up for the program, I would spend a long time each month trying to match the credits and savings. I finally decided it wasn't worth the time investment when I was saving so little money (usually no more than \$5 per month), but now after realizing how frequently my credits were not applied to my bill, I wish I had paid more attention. Though this would have led me to cancel my subscription.
9. At this time I would not recommend this program to my friends and family. The concept of utility bill savings is appealing, as is the option to participate in solar as a renter or without having to make a long-term rooftop commitment. However the program is not in a place I would be comfortable recommending it to others.

III. DISCUSSION

A. Unreceived or Inaccurate Bill Credits

10. I have received improperly billed credits, whether an incorrect amount or unallocated on your monthly Pepco bill at least 5 times for the periods noted below.
 - a. 4/24/20-5/22/20, notified by CleanChoice on 12/2/20

- b. 5/23/20- 6/23/20, notified by CleanChoice on 12/2/20
 - c. 7/25/20-8/25/20, notified by CleanChoice on 10/28/20
 - d. 9/25/20-10/23/20, notified by CleanChoice on 2/18/21
 - e. 10/24/20-11/21/20, notified by CleanChoice on 2/18/21
11. I do not recall any of the incorrect bills being re-issued by Pepco. The discrepancy was always brought to my attention by CleanChoice Energy.

B. Transparency

12. I could not locate the Community Net Metering credits on my Pepco bill without conferring with experts at CleanChoice who are able to explain what “CNM” referred to on the bill. Even at that point, it was a leap to connect “Community Net Metering” to “Community Solar.” Credits are buried within an acronym on page 2 of my monthly bill, which takes a critical eye to locate. It makes it appear as though Pepco is downplaying this opportunity to participate in renewable energy, which should be welcomed by the District.
13. It is unclear what the community solar impact is to my bill. While I can see savings for one month worth of utility billing, there’s no way to tell how that relates to a subsequent CleanChoice bill without manual tracking between the two bills. It’s confusing when the billing is in arrears, even more so when it’s frequently delayed beyond that expected month.

C. Discussion with Community Solar Provider

14. I’ve had to ask my wife to match up the Pepco credit period with the monthly CleanChoice invoice on at least 4 occasions. Although she is well versed in community solar, each of those times she has had to work directly with colleagues in the billing and operations division to understand how to calculate our specific savings. That is far too high a barrier

for a customer to be expected to have to scale just to understand the program they're enrolled in.

D. Other Comments

15. The District's community solar program has so much potential, but it is far too confusing as it currently stands. It's hard enough to understand how community solar applies to my Pepco bill, then I have to try to track that to a completely different billing cycle through CleanChoice. Then when those timelines misalign, as they frequently have done when credit periods are missed, trying to backtrack to understand whether I'm saving at all just becomes a far too onerous undertaking and I'd rather not participate. I consider myself a savvy consumer and this is way over my head. I feel that this overall bad customer experience reflects poorly on the District's interest in actually implementing a renewable energy program that is accessible for all. It's especially clear that Pepco does not have an interest in making community solar understandable for customers of CleanChoice or other organizations.
16. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No. _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: Matthew Fallon

Signature: 

Date: 2 / 16 / 22

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

In the Matter of

**the Complaint and Investigation of
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No. _____

AFFIDAVIT OF DANIELLE DEVERY

I. INTRODUCTION & QUALIFICATIONS

1. My name is Danielle Devery and I am a subscriber with the District of Columbia's community solar program.
2. I live at: **[BEGIN CONFIDENTIAL]** [REDACTED] [REDACTED] [REDACTED].
[END CONFIDENTIAL] My telephone number is: **[BEGIN CONFIDENTIAL]**
[REDACTED]. **[END CONFIDENTIAL]**
3. I signed up for community solar in April 2020. I received my first bill from CleanChoice Energy in October 2020. I am a current employee of CleanChoice Energy.
4. I am submitting this affidavit to address my own experience with the Community Renewable Energy Facilities (CREF) program in the District of Columbia.
5. From March 2018 to April 2021, I worked as retention marketing manager for CleanChoice Energy's community solar product and helped draft communications to CleanChoice Energy community solar customers who lived in Washington, DC.

6. I signed up for community solar through CleanChoice Energy to receive a 5% savings, support CleanChoice Energy's growing community solar program, and to better understand the community solar customer experience.
7. The most frustrating thing about my experience with community solar in Washington, DC has been the bill credit reporting delays and Pepco's lack of communication about when the issues will be resolved.
8. This affidavit reflects my experience as a consumer and customer of community solar.
9. Professionally, my experience with Pepco has been frustrating as I was responsible for writing bill delay messages to our community solar customers in Washington, D.C. with little information to provide them beyond "Pepco was experiencing reporting issues" which is why CleanChoice Energy has to bill for back-dated Community Net Metering Credits.
10. This affidavit was prepared by me or under my direct supervision and control.

II. SUMMARY OF AFFIDAVIT & FINDINGS

11. My affidavit can be summarized as follows:
 - Credit reporting delays by Pepco have helped to contribute to a confusing customer experience as a community solar customer in Washington DC. I've paid for multiple solar production periods in one bill which makes it hard to see promised savings.
 - The most frustrating issue that I have experienced are associated with credit reporting delays that have resulted in me paying for credits for multiple production periods and often out of order. For example, in June 2020 and July 2020, Community Net Metering credits were omitted from my Pepco bills. On September 2, 2020, I received an email notification from Pepco that I had a reissued bill with

a credit for \$73.81. I also received a letter further explaining the billing issue. Prior to receiving my first community solar bill from CleanChoice Energy in October 2020, I received an email from CleanChoice Energy explaining that the company had been unable to send me bills over the summer due to Pepco experiencing delays in sending reports of Community Net Metering credits.

12. My first community solar bill was for the solar production period from 7/25/20 to 8/25/2020. In December 2020, I received another notification from CleanChoice Energy explaining that my upcoming community solar bill would for two solar production periods: 4/24/2020-5/22/2020 and 5/23/2020 to 6/23/2020. This makes it extremely hard to discern if I am getting the savings I was promised. In January 2022, I received another email from CleanChoice Energy that Pepco was experiencing delays in sending Community Net Metering credit reports for the generation periods between 9/25/2021 to 10/25/21 and 10/26/21 to 11/2/21. This resulted in CleanChoice Energy conducting an extra billing cycle for the two generation periods.
13. All of these examples make it hard to realize the benefits of participating in community solar or seeing my expected savings. It is confusing for me, as someone who is more informed about the product so I cannot imagine the frustration that general customers have.
14. I believe these issues create a poor customer experience that makes it harder for community solar management companies to retain customers who are unsure of how the program works. The customer is more likely to blame the community solar provider versus Pepco since their community solar subscription is not with Pepco.
15. I still believe community solar will help increase demand for solar energy production in the greater Washington, D.C. area and will expand access to clean energy benefits and

savings for a wider range of consumers. However, I think there is a lot of work to be done on Pepco's end to make it more efficient to enroll and bill customers for the credits that consumers receive through the community solar program. Pepco should look to Xcel Energy as an example of how to better manage state community solar programs.

III. DISCUSSION

A. Unreceived or Inaccurate Bill Credits

16. My community net metering credits were omitted from my June 2020 and July 2020 Pepco billing statements.
17. In September 2020, I received an email notification on 9/3/2020 with a link to a corrected bill with a credit of \$73.81. This reissued bill covered May 21 to August 1, 2020. I also received a letter in the mail explaining that my credits were omitted from my June and July 2020 electric bills.

B. Transparency

18. I understand how community solar works and how to reconcile my Pepco bills and community solar bills that I receive from CleanChoice Energy to receive a 5% savings. However, Pepco has so many reporting delays in sending over its Community Net Metering Credit reports in a timely fashion that it's hard to keep track of the solar production periods I am being billed for. This makes it hard to feel like I am saving money.

C. Discussion with Pepco

19. I have not proactively contacted Pepco about these issues and Pepco has only contacted me once via email and letter in September 2020 about the reporting issues and the re-issued bill with a credit.

20. CleanChoice Energy has sent notifications to me three times explaining billing issues that

I should expect along with a billing explainer PDF. It made me aware that my CleanChoice

Energy community solar bill might be higher than normal.

21. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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Formal Case No. _____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: Danielle Devery

Signature: 1598D5E5C70C425...

Date: 3/7/2022



An Exelon Company

[REDACTED]

Account #: [REDACTED]

Dear DANIELLE DEVERY,

Every day at Pepco, we are working to provide safe, reliable, affordable, and sustainable energy service for our customers and communities. This includes providing our customers with accurate bills. Recently, we identified a billing issue that resulted in your Community Solar credits being unintentionally omitted from your June and July billing statements. We apologize for any confusion this may have caused.

We have taken steps to address this issue and prevent recurrence in the future. We have successfully adjusted many of the affected accounts, with credits for the missed periods appearing on the July and August billing statement. Our teams remain focused on resolving these issues and expect the remaining accounts to be successfully reconciled by September billing.

Please contact us with any questions, at 202-833-7500 Monday through Friday, 7 am to 8 pm.

Thank you for your understanding.

Pepco Customer Care

[REDACTED]

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

In the Matter of

**the Petition for a Formal
Investigation of Potomac Electric
Power Company's Community
Renewable Energy Facilities
Practices and Policies**

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Formal Case No. ____

AFFIDAVIT OF THOMAS M. CROWDER

I. INTRODUCTION & QUALIFICATIONS

1. My name is Thomas M. Crowder, and I am a subscriber with the District of Columbia's community solar program.
2. My address is: **[BEGIN CONFIDENTIAL]** [REDACTED]
[REDACTED] **[END CONFIDENTIAL]** My phone number is: **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]**.
3. I am enrolled in the community solar program with CleanChoice Energy.
4. I am a current employee of CleanChoice Energy and a Community Solar subscriber since April 1, 2019.
5. I am submitting this affidavit to address my own experience with the Community Renewable Energy Facilities (CREF) program in the District of Columbia.
6. This affidavit was prepared by me or under my direct supervision and control.

7. I enrolled in Community Solar because my home isn't conducive to rooftop solar, I wanted to help support the development of solar farms in the District, and I wanted to take advantage of the savings offered on my electric bill.
8. Years ago when I bought my house, I had someone assess my home for solar, and I wasn't able to get it due to my roof material, dormers, and roof direction. I wanted to support solar energy in the District, so I was very interested in the Community Solar product when it came out, and I was an early subscriber.
9. Beyond supporting solar, a big appeal of the product to me and likely many other people was savings. And yet, it's hard to see or understand the saving benefits of the product from a PEPCO bill. Not even an industry insider would be able to identify community solar on my PEPCO bill as it's referenced by a meaningless PEPCO acronym ("CNM Credit: PD NCS 11").

PEPCO has also:

- missed applying credits some months
- has not been transparent and has sent no notification of credit application delays or mistakes on their part
- sent confusing bills that show years of large unpaid balances on the last page that are not visually connected to the years of credits earned by community solar on previous pages
- not made an effort to train phone reps as my experience would suggest that their reps aren't familiar with the product or how it appears on the bill. They have been unable to help me at all.

II. SUMMARY OF AFFIDAVIT & FINDINGS

10. My affidavit can be summarized as follows:

- Not even someone in the industry would know what the credit line acronym stands for as labeled “CNM Credit: PD NCS 11;”
- PEPCO missed credits and didn’t communicate that;
- PEPCO reps are unfamiliar with the product and can’t help customers; and
- Bills are confusing and carry shocking balances due for years that are offset by credits buried elsewhere in the bill.

11. The problems bulleted above would cause any customer to question the authenticity and merit of the program.

III. DISCUSSION

A. Unreceived or Inaccurate Bill Credits

12. As noted below, I have had missing billed credits, on my monthly Pepco bill, as illustrated in the redacted copy of my bill(s) attached as Exhibit G-1.

13. I was missing April credits on my May 2020 bill. On my June 2020 bill I received a revised bill that contained April 2020 credits, but it was missing May 2020 credits. In July 2020 my credits resumed.

B. Transparency

14. I cannot locate the Community Net Metering credits on my Pepco bill. I have to make an assumption that a PEPCO acronym is where the credits are.

15. Is unclear what the community solar impact is to my bill.

C. Discussion with Pepco

16. I have had discussions with Pepco regarding these issues but found that Company representatives were unknowledgeable about the product and could not help me resolve my issue on more than one occasion.

D. Other

17. I am concerned that efforts to support solar generation inside the District are suffering due to the lack of support and poor billing and other practices at PEPCO.
18. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Renewable Energy
Facility Practices**

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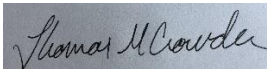
Formal Case No. ____

AFFIDAVIT

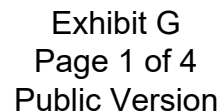
I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: Thomas M. Crowder

Signature:



Date: _____2/15/22_____



Account number: [REDACTED]

Your electric bill for the period
December 4, 2021 to January 6, 2022

Exhibit G-1

Page 2 of 4

Public Version

Details of your Electric Charges

Residential-R - service number [REDACTED]

Electricity you used this period

Meter Number	Energy Type Use (kWh)	End Date Jan 6 Reading 085735	Start Date Dec 4 Reading 085121	Number Of Days 34 Multiplier 1	Total Use 614
[REDACTED]					

Electric Summary	
Balance from your last bill	\$858.78-
Electric Charges (Residential-R)	\$2.38-
New electric charges	\$2.38-
Total credit amount	\$861.16-

Your meter records electric energy use in hourly intervals. Your bill is the total of all hourly intervals recorded during your billing period.
End and start date kWh meter readings are provided for informational purposes only.
Please visit My Account at pepco.com to view your energy use data.

Your next bill period is scheduled to end on February 3, 2022

Delivery Charges: These charges reflect the cost of bringing electricity to you.
Current charges for 34 days, **winter rates in effect.**

Type of charge	How we calculate this charge	Amount(\$)
Distribution Services:		
Customer Charge		15.27
Exelon Base Rate Credit		1.37-
Energy Charge	First 400 kWh X \$0.0114400 per kWh	4.58
Energy Charge	Last 214 kWh X \$0.0202336 per kWh	4.33
Residential Aid Discount Surcharge	614 kWh X \$0.0008610 per kWh	0.53
CNM Credit: PD NCS 11	247 kWh X \$0.1330854- per kWh	32.88-
Administrative Credit	614 kWh X \$0.0000000 per kWh	0.00
Underground Project Charge	614 kWh X \$0.0000300 per kWh	0.02
Subtotal (Set by DC PSC)		9.52-
EDIT Credit 5 Year - KWH	First 400 kWh X \$0.0001400- per kWh	0.06-
EDIT Credit 5 Year - KWH	Last 214 kWh X \$0.0002700- per kWh	0.06-
EDIT Credit 10 Year - KWH	First 400 kWh X \$0.0004700- per kWh	0.19-
EDIT Credit 10 Year - KWH	Last 214 kWh X \$0.0009300- per kWh	0.20-

Page 2 of 4

☐ **Check here to enroll in the Direct Debit plan**

Sign and date here _____

By signing here, you authorize Pepco to electronically deduct the amount of your monthly bill from your checking account each month. The check you send with this signed authorization will be used to set up Direct Debit. You understand that we will notify you each month of the date and amount of the debit, which will be on or after the due date stated on your monthly bill. You understand that to withdraw this authorization you must call Pepco. You understand that Pepco does not charge for this service, but that your bank may have charges for this service.

Customer Service Centers

Washington DC

701 Ninth St NW

(Mon - Fri) 8:30am - 5:15pm

2300 Martin Luther King Jr Ave SE (Mon - Fri) 9:00am - 5:00pm

Maryland

201 West Gude Dr, Rockville

(Mon - Fri) 10:00am - 2:00pm

8300 Old Marlboro Pk, Forestville (Mon, Wed, Fri) 10:00am - 2:00pm

Any inquiry or complaint about this bill should be made prior to the due date, in order to avoid late charges.

Electronic Check Conversion - When you provide a check as payment, you authorize us either to use information from your check to make a one-time electronic fund transfer from your account or to process the payment as a check transaction.

Account number

Your electric bill for the period
December 4, 2021 to January 6, 2022

Exhibit G-1

Page 3 of 4

Public Version

Energy Assistance Trust Fund	614 kWh X \$0.0002322 per kWh	0.14
Sustain Energy Trust Fund	614 kWh X \$0.0027001 per kWh	1.66
Public Space Occupancy Surcharge	614 kWh X \$0.0025200 per kWh	1.55
Delivery Tax	614 kWh X \$0.0070000 per kWh	4.30

Subtotal (Not set by DC PSC) 7.14**Total Electric Delivery Charges 2.38-****Supply Charges:** These charges reflect the cost of producing electricity for you.

You can compare this part of your bill to offers from competitive suppliers.

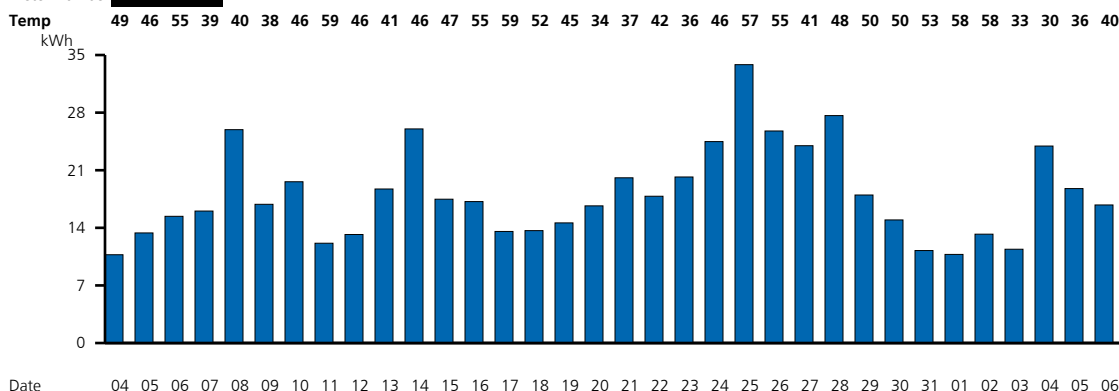
Based on your average rate class use, the annual price to compare is 7.57 cents per kWh.

Total Electric Charges - Residential-R 2.38-**Energy Usage History**

	Jan 21	Feb 21	Mar 21	Apr 21	May 21	Jun 21	Jul 21	Aug 21	Sep 21	Oct 21	Nov 21	Dec 21	Jan 22
Temp	41°	37°	38°	51°	61°	66°	77°	80°	80°	73°	63°	48°	46°
Days	34	28	28	33	30	29	33	29	30	32	29	30	34
kWh	616	497	483	457	465	544	1242	1271	1262	906	497	447	614

Your daily electricity use for this bill period. Visit My Account at pepco.com to see your hourly electricity use.

Meter Number

**CleanChoice electric supply charges**

Service number

Your electricity is supplied by CleanChoice Energy, Inc.. If you have any questions about your electric supply charges, call CleanChoice Energy, Inc. at 1-888-988-9564.

Billing period: Dec 4, 2021 to Jan 6, 2022 (34 days)

Type of service: Residential-R

Generation & Transmission 614 KWH @ \$ 0.05000 \$30.70

Amount(\$)**CleanChoice electric charges 30.70**

Thank you for purchasing 100% clean energy and helping us all enjoy cleaner air.

CleanChoice Electric Supply Summary

Balance from your last bill	\$836.55
Total Current Charges	\$30.70
New CleanChoice electric supply charges	\$30.70
Total amount due by Jan 31, 2022	\$867.25

Account number: [REDACTED]

Your electric bill for the period
December 4, 2021 to January 6, 2022

Exhibit G-1
Page 4 of 4
Public Version

You can help a Pepco customer in need of assistance with their energy bills. Simply pay exactly \$1.00 over your Pepco bill amount and that dollar will be contributed to the Good Neighbor Energy Fund administered by a local 501(c)3 non-profit organization. Amounts over \$1.00 will not be identified as a contribution and will result in a credit to your account. Pepco will match each donation by contributing a dollar to the fund, up to \$100,000.

Pepco EV charging stations are in a neighborhood near you, learn more here [Pepco.com/ev](https://www.pepco.com/ev).

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

In the Matter of

**the Complaint and Investigation
into Potomac Electric Power
Company's Community Renewable
Energy Facility Practices**

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Formal Case No. _____

AFFIDAVIT OF DAVID MURRAY

I. INTRODUCTION & QUALIFICATIONS

1. My name is David Murray, and I am a subscriber with the District of Columbia's community solar program.
2. I live at: **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]** My telephone number is: **[BEGIN CONFIDENTIAL]** [REDACTED] **[END CONFIDENTIAL]**.
3. I have been enrolled through the CleanChoice Energy community solar program for less than two years. I am submitting this affidavit to address my own experience with the Community Renewable Energy Facilities (CREF) program in the District of Columbia.
4. I signed up to be a community solar subscriber to support local, renewable generation. I expected the system to be fairly seamless given the capability of a large company to track my usage and subsequently ensure most of my energy originates from a local solar facility. However, there were a number of hiccups early on that left me very confused and had to go down a rabbit hole of understanding charges, which I would have struggled to figure out were I not in the industry.
5. This affidavit was prepared by me or under my direct supervision and control.

II. SUMMARY OF AFFIDAVIT & FINDINGS

6. The current credit allocation system is very confusing and could be standardized to better explain what I'm being charged by Pepco vs. my community solar subscriber. My current bill is showing an overpayment of \$320 to Pepco because I originally had been under the impression I owed that amount to Pepco. However, I have not paid anything to Pepco since the summer of 2020. Conversely, at the bottom of my bill, it says I owe Clean Choice Energy \$990. While I suspect this is how much I have paid them (given I'm current with my bill) it is unclear whether this is how much I owe.
7. The issues I experience with this program makes me question how much I'm saving with community solar. Am I going to owe money to Pepco later? I don't know.
8. I would recommend this program to my friends and family because I believe in solar energy but would warn them that this can be very confusing.

III. DISCUSSION

A. Unreceived or Inaccurate Bill Credits

9. It is unclear whether I have received improperly billed credits, whether an incorrect amount or unallocated on your monthly Pepco bill. The current way Pepco bills me is very ambiguous. I haven't paid them since September 2020 and have maintained a positive balance since.

B. Transparency

10. I cannot locate the Community Net Metering credits on my Pepco bill.
11. Is it unclear what the community solar impact is to my bill.
12. This concludes my affidavit.

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

In the Matter of

**the Complaint and Investigation into
Potomac Electric Power Company's
Community Energy Renewable
Facility Practices**

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Formal Case No. ____

AFFIDAVIT

I declare under penalty of perjury that the foregoing affidavit was prepared by me or under my direction and is true and correct to the best of my knowledge, information, and belief.

Name: David Murray

Signature:

A handwritten signature in black ink, appearing to read "D. Murray", with a long horizontal flourish extending to the right.

Date: 2/15/22

CERTIFICATE OF SERVICE

Formal Case No. _____, *In the Matter of the Complaint and Investigation into Potomac Electric Power Company's Community Renewable Energy Facility Practices*

I certify that on March 23, 2022, the public version of the *Office of the People's Counsel for the District of Columbia and District of Columbia Government's Joint Complaint and Petition for Investigation into Potomac Electric Power Company's Community Renewable Energy Facility Practices*, was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

Brinda Westbrook-Sedgwick
Commission Secretary
Christopher Lipscombe
General Counsel
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA
1325 G Street, NW, Suite 800
Washington, DC 20005
bwestbrook@psc.dc.gov
CLipscombe@psc.dc.gov

Andrea H. Harper
Assistant General Counsel
Dennis P. Jamouneau
Assistant General Counsel
POTOMAC ELECTRIC POWER
COMPANY
701 Ninth Street, N.W.
Washington, DC 20068
ahharper@pepcoholdings.com
djamouneau@pepcoholdings.com

/s/ Thaddeus Johnson
Thaddeus Johnson
Assistant People's Counsel