

Good evening Commissioners, stakeholders and members of the public. I am Adrienne Mouton-Henderson, Assistant People's Counsel for the DC Office of the People's Counsel and I served as lead counsel for the office regarding FC 1130. I am appearing on behalf of People's Counsel, Sandra Mattavous-Frye. We thank you for the opportunity to appear before you this evening on this important matter.

As you know, the mandate of the Office of the People's Counsel is to advocate the provision of quality utility service that is safe, reliable and affordable for all District consumers. Through our mission, OPC is *Preparing Today for a Brighter Utility Tomorrow* for the benefit of all consumers in all 8 wards. Our mission also includes the conservation of natural resources, and the preservation of environmental quality.

The Office believes the MEDSIS Initiative is timely and critical to meeting the needs of the changing landscape of the District's energy and environmental future and furtherance of the city's clean energy goals. OPC actively participated and played an integral role in all six MEDSIS working groups established by the Commission. The stakeholder process facilitated by the Smart Electric Power Alliance/SEPA was effective for the most part during the 50 meetings held, which allowed stakeholders an opportunity to engage in robust conversations regarding the pros and cons of modernizing the grid in the District.

As any stakeholder process goes, there are always lessons learned in hindsight and room for improvement. OPC would like to highlight a few recommendations of importance- that were delivered to the Commission on May 31st by the six working groups. A thorough consideration of non-wires alternatives in the District was conducted and indeed, an entire working group was dedicated to the topic exclusively. OPC is supportive of non-wires alternative solutions in the District, especially if these new technologies can help offset the costs of additional construction and infrastructure upgrades as the grid is modernized and renewables are used as an alternative fuel source.

OPC voices concern regarding the usage of utility – owned microgrids at this juncture without further investigation on the significant rate impact that would be borne by District ratepayers.

OPC is, however, supportive of a stakeholder-informed distribution system planning and NWA consideration process. That support, however, is contingent upon the proposed process being a wholistic system planning approach not a piece meal/ patchwork approach and load forecasting by the utility is more accurately forecasted than the current methodology utilized.

OPC further supports reconvening the dynamic pricing working group to assist the Commission in innovative rate design.

OPC recognizes the need for methodologies that would help evolve customer rate design and utility ratemaking to advance modernization initiatives. OPC understands there is a delicate balance to ensure that rates remain affordable, safe, and reliable for District consumers in all 8 wards. While it was helpful to learn more about the how policy experts and other jurisdictions are approaching the evolution of customer rate design and utility ratemaking to advance modernization initiatives, as stated in OPC's position reflected in the recommendations, the rate design working group did not have the necessary conversations to develop specific recommendations for the Commission's consideration at this time.

Lastly, OPC strongly supports revisions to the Consumer Bill of Rights in order to add protections for consumers as new technologies come on line in the pilot phase of MEDSIS. As OPC stated during our presentation in the customer impact working group, the District has three types of consumers: the Legacy Consumer - the consumer that has been served by the utility for some time who understands traditional service, they are the consumers who just want to pay their bill – with no assistance from fancy tools or apps; the Present-Day Consumer – the consumer who utilizes levelized billing programs and peak demand credit programs; and the Consumer of the Future - the consumer who wants service options at their fingertips – smartphone apps to control their usage and monitor their service options.

The banking industry has curated this service and consumers of the future are demanding real time usage options such as these. All these consumers have different needs, but all want reliable and affordable service and protections. And those protections should be in place prior to any pilot projects launching in the District.

Furthermore, we support the DCPSC consolidating energy educational material along with information on MEDSIS in one place on the Commission's website. This information should be clear, concise, consumer – friendly and available in multiple languages so the District's diverse population can effectively utilize the links. Additionally, the link on DCPSC's website should be shared with OPC, DOEE, DCSEU, WGL, and Pepco to host on their respective websites as well. This collaborative effort ensures that there is clear and concise communication to consumers surrounding MEDSIS and energy educational materials.

The District is something of a “utility unicorn.” The city is a very dense, urban populated area with very ambitious Renewal Portfolio Standard goals. We are serviced by one electric and one natural gas utility. Therefore, the way the District addresses grid modernization will differ compared to other jurisdictions and we must ensure that consumers properly understand the risks, costs and benefits.

OPC respectively requests that the Commission contemplate the impact of costs on all District ratepayers and what measures could be actualized through grid modernization and move the District forward to upgrade the system accordingly.

OPC looks forward to continuing to work with the Commission and stakeholders to advance the MEDSIS Initiative in the District in the next phase.

Thank you.