

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE'S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

I) Instructions

1. All responses and all attachments should be served via email on the following:

Stephen Marencic, Jr./smarencic@opc-dc.gov/202-261-1181

To the extent requested information cannot be provided in electronic format, please contact the OPC attorney listed above to discuss the best and most efficient way to provide the requested information.

2. If the Company does not understand a particular request, please contact the OPC attorney identified above.
3. These data requests are continuing in nature. The Company must supplement its answers if the response was incorrect when provided, additional information becomes available, or a previously submitted response changes.
4. Please provide each response on a separate page and identify the sponsoring witness.
5. Please provide your responses to these requests in electronic text-readable format (e.g., PDF or Word file).
6. To the extent your response includes responsive documents, please provide such documents in native file format with all metadata, internal links, and formulae intact.
7. To the extent not visible on the face of a document, please identify the date the document was prepared and the author(s) and recipient(s) of the document.
8. Please produce all documents within your possession, custody or control that are responsive to each request.
9. If a document, or a portion of a document, that is responsive to this request is withheld, for each such document, please identify the document and the reasons for withholding it. Further, if a document, or a portion of a document, that is responsive to this request is withheld on the grounds of privilege, please provide a privilege log that: (1) states the subject matter of the document and its date of creation, (2) identifies the nature of the privilege claimed and the identity of the person(s) or circumstances with respect to whom or which the privilege is claimed; and (3) identifies each person who heard or may have heard the communication or who read, received, or possessed the document or a copy of the document. Any non-privileged portions of the document must be produced.

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE'S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

10. If a document that is responsive to this request is known to have existed but is no longer in your possession, custody, or control, or no longer exists, please identify: (1) the document's title, subject matter, author(s), and date of creation; (2) the circumstances as under which document is missing, lost, discarded, destroyed, or otherwise unavailable; (3) whether the document has been transferred to another person(s), and if so, the identity of such person(s); (4) the date on which the document was lost, destroyed, or discarded or otherwise made unavailable; and (5) the last known custodian(s) of the document and the identity of any other individual with knowledge of the document's content. If any of the information required under this instruction is not known, please state so.
11. To the extent the data requested is available publicly online, please provide the URL as an operable link in your response.
12. If a complete answer to a particular discovery request is not possible, please identify which portions cannot be answered and why and provide a response to any remaining portion(s) of the request.
13. If a responsive document is provided on a confidential basis, please note that in the narrative response to the discovery request.
14. If a document is responsive to more than one request, please produce each such document in response to the request that is more specifically directed to the subject matter of the particular document and cross-reference the document in the responses to the other request.
15. Unless specifically stated otherwise:
 - a. Any word written in the singular shall be construed as plural or vice versa.
 - b. Any word written in the masculine, feminine, or gender-neutral form shall be construed to include all of the masculine, feminine, and gender-neutral forms.
 - c. Any word written in the past, present, or future tense shall be construed to include all of the past, present, or future tenses.
 - d. "Each" shall be construed to include the word "every" and vice-versa.
 - e. "And," "or" and "and/or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of the request all responses which otherwise might be construed to be outside its scope.

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE’S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

16. The following definitions shall apply to this request:

- a. “Communication” means the transmittal of information by any means, including without limitation any oral, graphic, written, printed, or electronic transmission. These transmissions include, but are not limited to letters, correspondence, facsimiles, telegrams, memorandums, e-mails, notes, meeting logs, testimony, affidavits or other sworn statements, and telephones or personal conversation.
- b. “Concerning,” “relates,” or “relating to” a subject means referring to, describing, discussing, evidencing, addressing, constituting, forming the basis of, or mentioning in whole or in part, the subject.
- c. “District” or “DC” shall mean Washington, D.C.
- d. “Document” shall be construed in its broadest senses and shall include without limitation any written, recorded, printed, graphic, electronic, or recorded material whether in original or in copy form, and shall include all prints, issues, alterations, modifications, changes, amendments, and non-identical copies to the foregoing. These materials include, but are not limited to: letters, memorandums, interoffice and intraoffice communications, notes, log books, notebooks, electronic mail, contracts, agreements, workpapers, audit papers, spread sheets, studies, reports, opinions, records, calendars, notices, deposition recording and transcripts, meeting minutes, programs, computations, accounting sheets, diaries, legal opinions, messages, telegrams, brochures, computer printouts, electronic, mechanical and electrical records of any kind (e.g. compact disks, mp3 files, flash drives and records), invoices, bills, graphs, projections, financial statements, balance sheets, journal entries, blueprints, architectural drawings, advice or other items.
- e. “Identify” or “identity” is used as follows:
 - i. When used with reference to a natural person means to state: his or her full name, position, business affiliation, and business contact information.
 - ii. When used with reference to an entity, means to state: the full name of the entity, the type of entity (e.g., corporation, partnership, etc.), the address and telephone number of its principal place of business, the contact information of its legal agent;
 - iii. When used with reference to a document, means to state: the title, subject matter, date of creation, date(s) of any amendment, its author(s), its

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE’S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

recipients, its present or last known location(s) and the identity of its custodian(s).

- iv. When used in reference to a communication, means to state: the substance of the communication, the date and approximate time when the communication occurred, the type of communication (e.g., meeting, telephone, etc.), the identity of the person(s) who made and received the communication, the place(s) where the communication was made and where it was received, the identity of any other person(s) present when the communication was made and/or received.
- v. When used in reference to an act, means to state: the substance of the act, the date, time, and place of performance, the identity of the actor(s), and the identity of all other persons present or in communication with the actor(s) at the time of an act.
- f. “OPC” or the “Office” shall mean the Office of the People’s Counsel for the District of Columbia.
- g. “Person” shall mean any natural individual or any corporation, firm, partnership, proprietorship, association, business, governmental entity, joint venture, board, authority, commission, agency, or other entity or organization, and all of such person’s principals, employees, agents, attorneys, consultants, and other representatives.
- h. “Ward” shall be defined as political boundaries within the District of Columbia represented on the Council of the District of Columbia.
- i. “You,” “your,” “Company,” or “PEPCO” shall mean Potomac Electric Power Company, and any persons acting on its behalf.
- j. “Informational Meter Readings” shall mean the end and start date kWh meter readings provided for informational purposes only on Pepco’s Residential-R billing.
- k. “Complainant” shall mean Rebecca Levinson.

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE’S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

II) Data Requests

- 01-1. Identify the official system of record used by Pepco for revenue-grade billing purposes to calculate Complainant’s monthly usage from July 2023 to present (e.g., physical meter display, AMI load profile data, customer portal data extracts, or internal metering/billing system logs).
- 01-2. Identify the data source Pepco uses as the “official record” for billing purposes (e.g., physical meter display, AMI load profile data, customer portal data extracts, internal metering/billing system logs).
 - A. Describe the process and tools available to independently validate the accuracy of complainant’s monthly billed net consumption.
 - B. Explain how complainant can read her Pepco meter to accurately account for her monthly usage.
- 01-3. Provide a technical explanation of how Informational Meter Readings are calculated and displayed on consumer bills.
- 01-4. Specify the data source(s) and calculation method used to generate Informational Meter Readings for Complainant’s account from July 2023 to present.
 - A. Clarify whether the above methodology is standardized across both Net Energy Metering (NEM) and Non-Net Energy Metering billing, or if distinct billing calculation methodologies are utilized.
- 01-5. Provide the algorithm, formula or methodological framework Pepco used to aggregate interval data into monthly billed consumption values.
- 01-6. Provide all applicable internal policies, protocols, or technical guidance documents governing estimated billing practices, including defined thresholds, triggers for estimation, and quality assurance procedures.
- 01-7. Provide all available versions of Complainant’s hourly interval usage data from May 2024 to present, including any superseded or overwritten data sets.
- 01-8. Provide any system audit trails or change logs that indicate when, by whom and through what interface edits or modifications were made to Complainant’s billing data or online portal records from July 2023 to present.

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE'S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

- 01-9. Explain, for each billing cycle since May 2024, any discrepancies observed between physical meter display readings, customer portal usage data, and actual billed consumption.
- 01-10. Provide all data downloaded on May 7, 2025 from meter number 1ND313543385.
- 01-11. Provide all downloaded or otherwise preserved data from meter number 1ND346565614.
- 01-12. Explain the reasons for discrepancies for the May 2024 billing and why the data from both meters does not appear on the bill.
- 01-13. Identify if there are any communication interface provisions for Pepco to remotely interface with the complainant's Distributed Energy Resource (DER) system inverters or other behind the meter equipment.
- 01-14. Provide the exact date and time Pepco either replaced, and/or reprogrammed Complainant's meter to operate under NET metering protocols.
- 01-15. Submit all versions of the Net Energy Metering Agreement executed with Complainant, including the original version and any subsequent amendments or revised versions.
- 01-16. Detail the computational methodology used to calculate excess generation credits, specifying the applicable compensation rate(s) time-of-export data used and reference data sources for export quantification. .
- 01-17. Explain the rationale for the issuance of revised bills for July 2024 billing period and identify whether the revisions corrected existing inaccuracies or resulted in new calculation errors.
- 01-18. Provide any internal communications, case notes or adjustment logs from the Green Power Connection Team, Customer Service, Special Investigations or any other internal units referencing manual adjustments or bill recalculations to Complainant's account from May 2024 to present.

**DISTRICT OF COLUMBIA PUBLIC SERVICE COMMISSION
CONSUMER COMPLAINT NO. CC 2025-9075277**

**OFFICE OF THE PEOPLE’S COUNSEL
DATA REQUEST NO. 1
TO POTOMAC ELECTRIC POWER COMPANY**

8/7/2025

- 01-19. Provide the engineering or system-based justification for the estimated bill issued for the June 2024 and July 2024 billing periods, including an explanation of why the final meter reading was recorded as “unavailable” despite ongoing AMI data transmission.
- 01-20. Detail the sequence of billing revisions for the July 2024 cycle, along with the root cause and justification associated with each correction.
- 01-21. Provide transcripts or recordings for any customer service interactions (phone, email, or system notes) between Complainant and Pepco’s Green Power Connection Team, Customer Service, or Special Investigations.
- 01-22. Provide a list of Pepco personnel (including title and department) who reviewed, handled, or issued responses to Complainant’s formal and informal service or billing complaints.