OPC-DC

Office of the People's Counsel

ADVOCACY | EDUCATION | PROTECTION

Office of the People's Counsel (OPC)

FY 25- 26 Performance Oversight Hearing Responses Before the Committee on Business and Economic Development

Submitted to the Office of the Chairman of the Council of the District of Columbia

January 14th, 2026

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ATTACHMENT 1

OFFICE OF THE PEOPLE'S COUNSEL

2026 PERFORMANCE OVERSIGHT

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Supplemental Performance Oversight Questions – Office of the People's Counsel

Racial Equity

1. **Describe any programs or policies where the Office has had success in building racial equity during Fiscal Year 2025 and Fiscal Year 2026 to date.**

Programs or Policies Where OPC Had Success in Building Racial Equity (FY25 & FY26 to Date)

In Fiscal Year 2025, the Office of the People's Counsel (OPC), through its Water Services Division, hosted the Water Summit on September 29, 2025. This event was designed to advance racial equity by ensuring inclusive participation from residents across all eight wards and diverse racial and ethnic backgrounds. The Water Summit provides a platform for education and engagement on utility resources available in the district, including water, energy, and telecommunications services.

The event focused on:

- Equitable Access to Information: Delivering clear guidance on programs that assist consumers in managing utility bills and navigating affordability challenges.
- Community Empowerment: Helping residents understand their rights and available assistance programs, regardless of income or background.
- Cross-Cultural Engagement: Creating an inclusive environment where diverse communities can share experiences and learn strategies to maintain reliable and affordable utility services.

By bringing together stakeholders and residents from varied racial and socioeconomic backgrounds, OPC demonstrated its commitment to reducing disparities in utility access and affordability. The Water Summit served as a model for how targeted outreach and education can promote racial equity and empower historically underserved communities.

2. **In the context of the Office and its mission, describe three areas, programs, or initiatives where the Office has the greatest opportunity to address racial inequity.**

   From a litigation perspective, OPC has the greatest opportunity to address racial inequity through effective advocacy in rate cases to control the rising cost of energy and by collecting data on the impacts of rate cases and legislative mandates. To collect the necessary data, the Office has filed a petition to establish an affordability study. One component of the petition requests that the DC Public Service Commission (PSC) adopt an affordability metric. The

affordability metric will be a real-time measure of the impact of utility proposals and Commission decisions on energy affordability for residential consumers. This data can be used to inform the Commission, utility companies, consumer advocates, and other interested parties as to how to enhance existing low-income programs or create new ones where necessary.

Furthermore, the Office identifies the following strategic areas for addressing inequity:

1. Targeted Outreach and Education

- Ward-Focused Engagement: Host monthly community forums in Wards 5, 7, and 8 to educate residents on utility rights, billing assistance programs, and complaint resolution.
- Multilingual Resources: Provide materials in multiple languages to ensure inclusivity for non-English-speaking communities.
- Mobile Outreach Units: Deploy outreach teams to high-traffic areas (community centers, libraries, schools) to meet residents where they are.

2. Adopt-a-School Program

- Early Education on Utility Advocacy: Develop age-appropriate curriculum for middle and high school students on energy efficiency, water conservation, and consumer rights.
- Student Ambassadors: Train students as "Utility Advocates" who can share knowledge with peers and families.
- Career Pathways: Partner with utility companies to introduce internships or mentorship programs for students interested in careers in the utility industry.

3. Partnerships with External Stakeholders

- Utility Companies & Agencies: Collaborate on equitable access programs like discounted rates, arrearage forgiveness, and energy efficiency upgrades for low-income households.
- Community-Based Organizations: Work with local nonprofits and faith-based groups to amplify outreach and build trust in underserved communities.
- Advisory Neighborhood Commissions (ANC): Attend local ANCs meetings to identify issues at the neighborhood level.
- Data-Driven Approach: Use demographic and usage data to identify inequities and tailor solutions.

4. Digital & Media Campaigns

- Social Media Engagement: Share short videos and infographics explaining consumer rights and assistance programs.

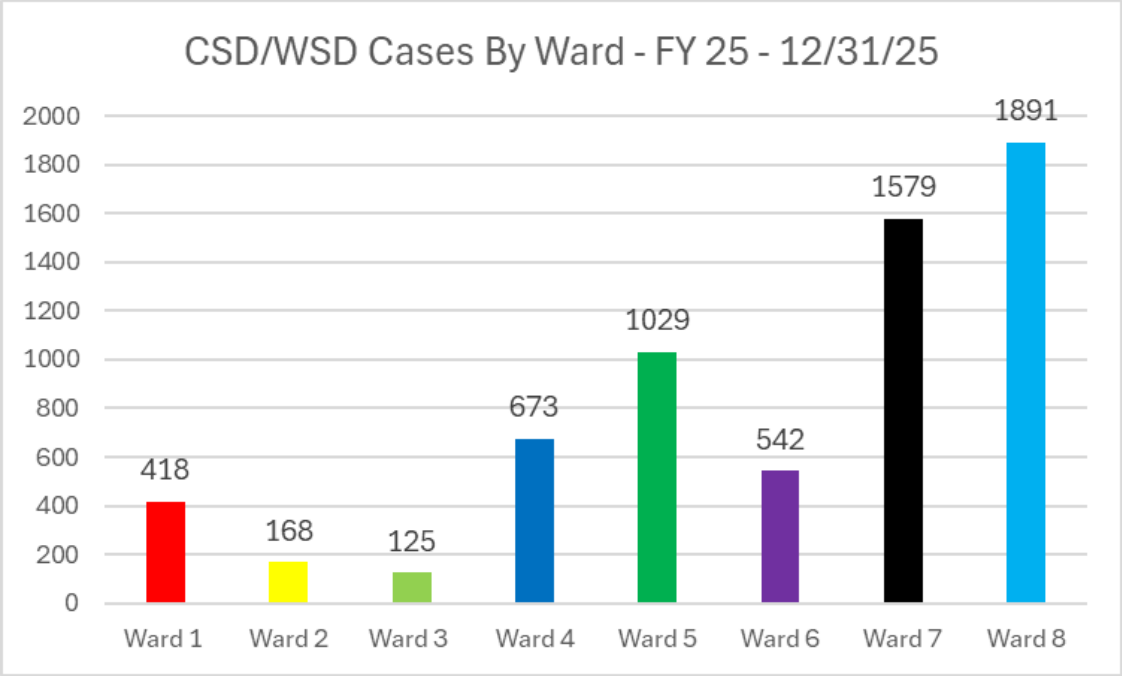
- Ward-Specific Messaging: Highlight success stories from Wards 5, 7, and 8 to encourage participation and build confidence.

5. Equity Metrics and Accountability

- Track Outreach Impact: Measure participation rates by ward and demographic to ensure equitable reach.
- Consumer Satisfaction Surveys: Collect feedback to continuously improve services and address gaps.

3. **What barriers does your Office face when trying to: (1) make progress toward racial equity or (2) better understand racial inequity within the agency's context and operations (if any)? How does your Office's spending address existing racial inequities (grant disbursement, procurement/contracting, etc.)**

There are no barriers to racial equity or understanding of racial inequity. The mission of the Office of the People's Counsel ("OPC" or "The Office") is to: advocate for the provision of safe and reliable quality utility service and equitable treatment at rates that are just, reasonable, and nondiscriminatory; advocate for climate change policies that transition the District to a clean energy economy and sustainable environment in support of the District's climate goals and that benefits District utility consumers; assist individual consumers in disputes with utility providers; provide technical assistance, education, and outreach to consumers, ratepayers, community groups, and associations; and provide legislative analysis and information to the Council of the District of Columbia on matters relating to utilities. The Office's mission further includes consideration of the District's economy and promotion of environmental sustainability of the District. The chart below reflects the complaints the office receives from Wards. A majority of those complaints originate from Wards 4,5,7,8, and those Wards have the lowest income. (See chart; These numbers reflect the first quarter of FY26)



Please provide data on the racial diversity among leadership and at all staff grade levels. How does retention differ by race across levels? How does pay differ by race within levels?

Racial Diversity Among Leadership:

- African American representation: 76.8%)
- Their average years of service: 23.3 years
- Range: 3 years (Consumer Services Manager) to 41 years (People's Counsel)
- Their average years of service: 23.5 years
- Range: 11 years (External Affairs Officer) to 38 years (Account/Rate Case Manager)

Observation: Retention is equal across racial groups in leadership, with both African American and Asian or Pacific Islander employees exhibiting long tenure, averaging over 23 years.

Pay Differentiation by Race Within Leadership Levels:

African American Employees:

- Highest Annual Rate: $209,220.16 (People's Counsel, 41 years of service)
- Lowest Annual Rate: $130,000.00 (Consumer Services Manager, 3 years of service)
- Highest Annual Rate: $184,306.11 (Account/Rate Case Manager, 37 years of service)
- Lowest Annual Rate: $145,000.00 (External Affairs Officer, 11 years of service) Observation: African American employees on average earn slightly more, though pay varies significantly within levels and appears tied to role type and tenure rather than race.

Agency Specific Questions

4. **Please identify the five most significant formal cases currently pending before the Public Service Commission and provide a summary of the Office's position and the current status of the matter. To the extent permissible, please provide an explanation and status update regarding OPC's participation in each formal case identified.**

The five most significant formal cases pending before the Public Service Commission are:

1. Formal Case No. 1176 – Pepco rate case appeal
2. Formal Case No. 1180 – Washington Gas Light rate case
3. Formal Case No. 1179 - PROJECTpipes (District SAFE Plan)
4. GD2025-01 - OPC's Petition to Establish an Affordability Proceeding
5. Formal Case No 1167 – Climate Business Plan

Formal Case No. 1176 – Pepco rate case and Appeal to the DC Court of Appeals

On April 13, 2023, Pepco filed a request for approval of a multi-year rate plan that would raise rates by $186.5 million over three years (2024-2026). This case was not a typical request to increase rates; it was a proceeding to examine whether, going forward, Pepco could shift the means of determining rates from a traditional one-year application format to a multi-year rate plan.

OPC opposed Pepco's multiyear rate plan because it proposed excessive and front-loaded rate increases that would require customers to pay more before benefits were proven, restricted the Commission's ability to fully review whether Pepco's costs were reasonably and prudently incurred, and relied on an unjustified return on equity that would unnecessarily increase customer bills, and included weak performance metrics that failed to ensure meaningful service improvements, reliability gains, or accountability for poor performance. Overall, OPC concluded that the plan shifted financial risk from Pepco's shareholders or customers and was inconsistent with the requirement that rates be just, reasonable, and supported by the record.

Another huge issue in this case is that despite the complex financial, operational, and policy issues raised in this case, the Commission did not convene an evidentiary hearing. Such a hearing would have allowed for a full examination of Pepco's financial assumptions, construction and investment plans, and the fundamental question of whether shifting to a multiyear rate plan was reasonable and in the public interest.

On November 26, 2024, approved a Modified Extended Multiyear Rate Plan (MRP) Pilot." This resulted in the approval of a multiyear rate plan for two years as opposed to three years from 2025-2026, authorizing a $123 million-dollar cumulative rate increase. Specifically, the rate increase authorizes a $99.7 million increase for CY 2025 and a $23.7 million increase for 2026.

OPC filed an Application for Reconsideration of the order, which was denied. OPC then filed a Petition for Review with the DC Court of Appeals. On November 28, 2025, the DC Court of Appeals heard the case, and a decision is expected soon.

Formal Case No. 1180 – WGL Rate Case

On August 5, 2024, Washington Gas Light Company (WGL) filed an application seeking authority to increase rates and charges for natural gas service in the District of Columbia by a substantial $45.6 million. This request came just seven months after WGL received $24.6 million in a previous rate case.

The three major issues in that case were 1) the transfer of costs from Project Pipes into rates, 2) WGL's proposal to recover accumulated tax losses, and 3) a request to increase the company's overall revenue requirement to fund the delivery of natural gas service.

OPC thoroughly examined the application and presented testimony to oppose the request for such a large increase. Specifically, OPC found that the request to recover many of the PROJECTpipes costs into base rates was premature because those costs have not been examined through the required prudence review. As to the request to recover accumulated tax losses, OPC found that WGL failed to provide documentation to verify the source, amount, or accuracy of the tax losses and that the company relied on assumptions rather than record evidence to support the claimed tax impacts. Last, as regards WGL's request to increase its overall revenue requirement, OPC found that the company overstated its need for more review by relying on assumptions and projected costs instead of actual costs.

Overall, OPC's analysis shows that if the Commission approves any rate increase, it should not exceed $9.42 million.

On November 25, 2025, the PSC granted WGL an increase of $33.4 million. This is the largest increase granted to WGL. In December 2025, OPC filed an application for reconsideration of the order, and we are awaiting the Commission's decision.

Formal Case No. 1179 - PROJECTpipes (District SAFE Plan)

PROJECTpipes is a long-term infrastructure replacement initiative led by Washington Gas Light Company, created to modernize the District of Columbia's aging natural gas pipeline system. The program's original goal was to proactively replace leak-prone pipe materials to enhance public safety, reduce methane emissions, and improve the reliability of gas service. It is funded through a special mechanism known as the Accelerated Pipe Replacement Plan surcharge, which enables WGL to recover project costs more quickly than through traditional rate cases. The surcharge is recovered from WGL ratepayers,

The initial phase of PROJECTpipes was approved by the Commission in 2014. Since that time, the Commission has approved a second version of PROJECTpipes in 2018. On December 22, 2022, WGL submitted a five-year, $671.8 million proposal for PROJECTpipes under the new name, District SAFE Plan.

OPC reviewed WGL's proposal and raised multiple concerns in its testimony. OPC found that, despite PROJECTpipes having begun in 2014, a substantial backlog of unrepaired leaks remains; WGL failed to remain within budget during the first two phases of

PROJECTpipes the Company proposed to rely on a software platform for leak planning and execution that is incompatible with the District's topography; and the objectives of District SAFE are misaligned with the District's climate goals.

In addition, OPC determined that, even after being directed by the Commission to amend District SAFE to address these and other deficiencies, WGL failed to provide a coherent strategic plan for pipeline replacement and decommissioning, did not focus replacement efforts exclusively on the highest-risk pipe segments based on age, material, and leak history, and did not demonstrate an appropriate balance between safety improvements, emissions reductions, and the avoidance of stranded assets. OPC concluded that these deficiencies alone warranted rejection of WGL's District SAFE plan and recommended that the Commission deny the proposal and require WGL to address pipeline replacement through its routine construction operations, without accelerated cost recovery.

On December 9, 2025, the Commission held a limited evidentiary hearing on the issue of the functionality and results of the risk modeling software used to identify which pipes will be replaced. The other issues regarding accounting and other financial issues will be reviewed through written pleadings.

No decision has been issued in this case.

GD2025-01 - OPC's Petition to Establish an Affordability Proceeding

On November 25, 2025, OPC filed a petition with the D.C. Public Service Commission to open a comprehensive energy affordability proceeding to confront the growing crisis of energy affordability.

One component of the petition requests that the PSC adopt an affordability metric. The affordability metric will be a real-time measure of the impact of utility proposals and Commission decisions on energy affordability for residential consumers. This data can be used to inform the Commission, utility companies, consumer advocates, and other interested parties as to how to develop solutions to reduce energy burdens.

This is one of the most significant matters currently before the Commission because it goes beyond any single case and asks the PSC to fundamentally modernize how it evaluates the real-world economic impact of its decisions on District residents. By establishing a clear, data-driven affordability metric, the Commission would gain a consistent, transparent tool to assess cumulative bill impacts, identify when utility proposals threaten household energy affordability, and ensure that future decisions align with the district's equity and affordability goals.

The Commission has docketed the case but has not issued any further orders for parties to respond to the petition.

Formal Case No. 1167 -- Climate Business Plan

This proceeding has seen both utilities file their 15-year plan to reduce emissions and facilitate transportation and building electrification. WGL filed its plan on 6/9/25; Pepco filed its plan, and the electrification study was filed on 10/31/25.

OPC's comments on WGL's proposal (filed 9/5/25) reiterated that the gas utility's plan is non-responsive to the Commission's order to comply with District emissions reduction laws as it largely maintains a business-as-usual approach to gas distribution and relies primarily upon carbon offset credit purchases for emissions reduction compliance, with increased cost passed along to ratepayers.

Comments on Pepco's plan and electrification study are due January 30th; OPC is currently drafting comments focused on potential concerns with the proposal. OPC has been involved in providing comments for this proceeding as well as for the Commission's Benefit-Cost Analysis Framework (GD2019-04-M), which is set to inform the implementation of the utilities' plans.

Once all comments are submitted to the Commission, the PSC will then issue orders accepting or rejecting the utilities 15-year plans and establishing implementation timelines for proposed projects from each utility.

5. **Please identify any legislative requirements that the Office lacks sufficient resources to properly implement. Please identify any statutory or regulatory impediments to your agency's operations or mission.**

   There are no legislative requirements for which the Office lacks sufficient resources to properly implement.

6. **In FY26, the Office received an increase of $22,110 in the Consumer Services and Advocacy program to support non-personnel services costs for the Advocate for Consumers Fund.**
   a. **Please describe how the Office will utilize this additional funding for the benefit of consumers.**

      The Office of the People's Counsel will utilize the additional funding to educate consumers about energy-saving ideas and techniques, advertising, publications, and brochures on how the Office can assist consumers with utility issues.

Consumer Issues

7. **Please provide an update of the number of consumer complaints received by the Office in Fiscal Year 2025 and Fiscal Year 2026, to date broken down by utility service.**

Date range 10/1/2024 – 12/31/25

Electric (Pepco): **4096**

Gas (WGL): **1156**

Water (DC Water): **1211**

a. Please provide analysis of any trends observed in the complaints received.

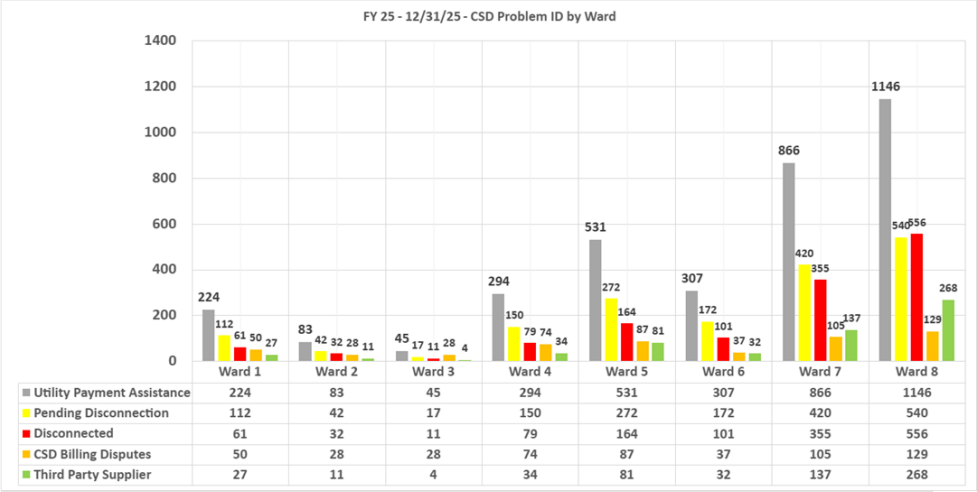
Observed Trends (Past Fiscal Year)

- High Volume of Complaints: Residents in Wards 5, 7, and 8 reported significant challenges obtaining financial assistance for utilities.
- Decrease in Assistance Programs: Available programs have dwindled, leaving many households without financial support.
- Misalignment Between Usage and Aid: Assistance amounts do not match actual utility usage, which increases arrearages and service disconnections.
- Impact on Vulnerable Communities: Low-income and historically marginalized residents are disproportionately affected.

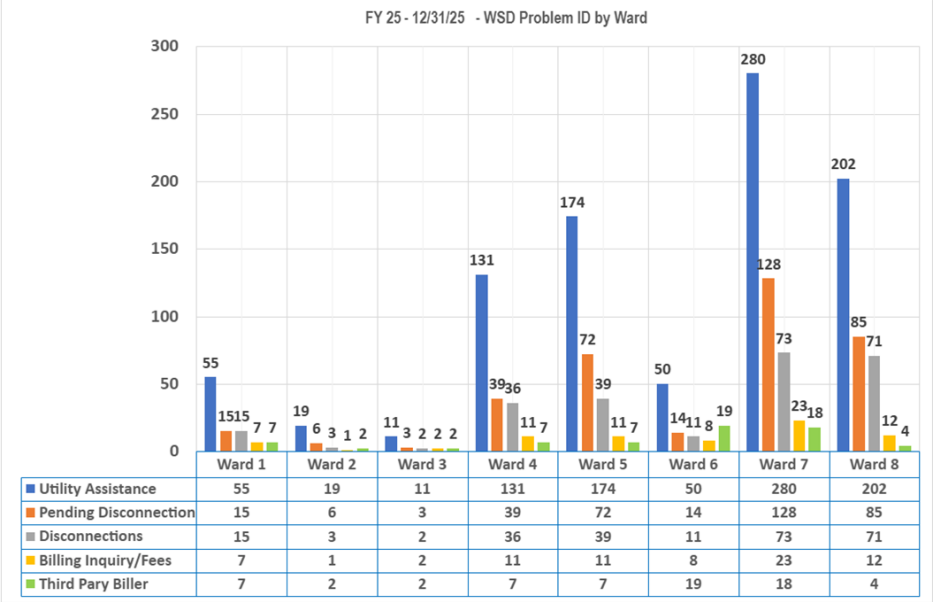
Key Challenges

- Program Funding Gaps: Reduced funding or stricter eligibility criteria for assistance programs.
- Lack of Awareness: Residents may not know about existing programs or how to apply.
- Administrative Barriers: Complex application processes discourage participation.
- Language barriers and an emerging fear of contacting or seeking relief from government agencies.

b. Please provide a Ward breakdown of the consumer complaints received by utility and type of complaint.



	Ward 1	Ward 2	Ward 3	Ward 4	Ward 5	Ward 6	Ward 7	Ward 8
Utility Payment Assistance	224	83	45	294	531	307	866	1146
Pending Disconnection	112	42	17	150	272	172	420	540
Disconnected	61	32	11	79	164	101	355	556
CSD Billing Disputes	50	28	28	74	87	37	105	129
Third Party Supplier	27	11	4	34	81	32	137	268



	Ward 1	Ward 2	Ward 3	Ward 4	Ward 5	Ward 6	Ward 7	Ward 8
Utility Assistance	55	19	11	131	174	50	280	202
Pending Disconnection	15	6	3	39	72	14	128	85
Disconnections	15	3	2	36	39	11	73	71
Billing Inquiry/Fees	7	1	2	11	11	8	23	12
Third Pary Biller	7	2	2	7	7	19	18	4

c. Please provide an update on the Office's Water Services Division and its capacity to address DC Water issues.

DC Water Forgiveness Program (with OPC Support)

Goal: Help residents reduce outstanding water bills and avoid disconnections while maintaining service integrity.

How It Works:

- Residents enroll in a payment plan for their outstanding balance.

- If they make three consecutive on-time payments, they receive a credit equal to three months of their bill.
- This cycle continues, allowing residents to lower their balance faster compared to standard monthly payments that often include additional late fees.
- Encourages consistent payment behavior and provides a clear path to financial recovery.

Benefits to Residents

- Accelerated Debt Reduction: Credits significantly reduce arrears over time.
- Avoid Service Disconnection: Keeps water service active while resolving debt.
- Restores Trust: Demonstrates that utilities and OPC are working together to support consumers.

Next Steps for Outreach

- Community Education: Create flyers, social media posts, and webinars explaining the program.
- Ward-Focused Campaign: Target Wards 5, 7, and 8, where arrears and disconnections are highest.
- Partner Amplification: Work with local nonprofits and schools to spread awareness.

8. **District consumers saw increases in electricity costs starting in July 2025 due to higher capacity prices across the region resulting from the recent Base Residual Auction conducted by PJM Interconnection. How did the Office respond to these changes?**

   In response to the PJM Capacity Auction released on 7/30/24, OPC took three actions:

   1. On October 15, 2024, OPC filed a petition with PSC to investigate 1) the financial impact of the auction, 2) ways to educate consumers on the new charges, and 3) learn what changes Pepco will make to its business strategy in light of the capacity auctions. The Commission granted OPC's petition and directed a task force of parties to develop a report. The first report was filed on July 31, 2025. A second report will be filed later this year.
   2. OPC commissioned a study with Synapse to examine what happened at the auction to cause the dramatic increase in costs and the impact on monthly impact on consumers' bills in the District of Columbia: See attached Study.
   3. OPC coordinated with other advocate offices in the PJM region to file comments to address the structural issues in PJM that contributed to the cause of the increase in costs, specifically the lack of generation resources. OPC continues to work with these offices as these issues evolve.

   (See Attachments #1 (PJM Task Force Report, Part 1.PJM Report done by Synapse)

9. **PJM has estimated that existing and projected data center growth will continue to increase the cost of electric power for consumers. Will this create any cost or capacity burdens for the Office to respond to these concerns?**

Yes. The increase in data center growth will cause cost burdens for District of Columbia consumers. As noted in response to Question 9, OPC continues to work with other advocate offices in the PJM region to file comments with the Federal Energy Regulatory Commission and PJM to recommend solutions to the factors causing costs to rise. OPC is also inquiring with Pepco as to the specific amount of cost increase that is attributable to data centers in the PJM region.

Governance and Personnel:

1. **Please provide a complete and current organizational chart for the agency and each division and subdivision within the agency, including:**
   a. **The names and titles of all senior personnel;**

      (See Attachment #2 OPC Organizational Chart)

   b. **A description of the roles and responsibilities for each division and subdivision;**

      - The People's Counsel leads the office and determines all policy decisions advanced by the Office to ensure the agency meets its statutory mandate to represent and advocate for DC utility consumers.

      - The Directorate Division determines policy that is consistent with the Agency's mission to advocate for and protect the interests of DC utility consumers.

      - The Operations Division is responsible for agency fiscal management, procurement, human resources, staff development, benefits administration, communications, policy, and Information Technology functions.
      - The Litigation Services Division engages diverse energy, telecommunications, technical, and market monitoring functions as it litigates cases involving utility companies before the Public Service Commission, federal regulatory agencies, and the DC Court of Appeals.
      - The Consumer Services Division provides education and outreach on utility issues to District consumers, assists in the resolution of consumer complaints, and provides technical assistance to lay advocates seeking to participate in the regulatory process.

- The Water Services Division serves as the statutory advocate for water consumers. WSD provides legal advocacy, education, and outreach, and individual complaint resolution assistance for DC Water consumers.

c. A narrative explanation of any changes to the organizational chart made in the last calendar year; and

No changes were made to the narrative

d. An indication of whether any positions in the chart are vacant.

The Office of People's Counsel currently has three vacant positions:
1. Associate Director of Consumer Services
2. Water Services Attorney
3. Assistant People's Counsel

2. Please provide a complete, up-to-date list of contract workers working directly for your agency, ordered by program and activity, and including the following information for each position: (*see table below***)**

a. Title of position;
b. Indication that the position is filled or vacant;
c. Date employee began in the position;
d. Whether the position must be filled to comply with federal or local law;
e. If applicable, the federal or local law that requires the position be filled;
f. The entity from which they are contracted; and
g. The contracted annual cost.

Title	Filled or Vacant	Start Date	Federal or local law compliance required?	Applicable law	Contracting entity	Contracted annual cost
Production Control Clerk	Vacant	10/1/25	N/A	N/A	Aspen DC Management Solutions	$70,332.00
Executive Assistance	Vacant	12/15/25	N/A	N/A	Aspen DC Management Solutions	$11,136.00
Info Tech (Intern)	Vacant	12/15/25	N/A	N/A	Aspen DC Management Solutions	$14,364.00

3. **Please provide, for each month of FY25 through FY26 to date, the net number of personnel separated from and hired to the agency.**

Hired in FY25-FY26	Separated from FY25-FY26
Program Support Receptionist	Assistant People's Counsel-Water
Supervisory Trial Attorney	Assistant People's Counsel-Utility
Operations Support Services	Consumer Outreach Specialist- Bilingual
Utility and Regulatory Program Analyst	
Consumer Outreach Specialist- Bilingual	
Total: 5	**Total: 3**

4. **Does the agency conduct annual performance evaluations of all its employees? If so, who conducts such evaluations? What steps are taken to ensure that all office employees meet individual job requirements?**

   Managers conduct performance planning sessions with each staff member. This provides a basis for evaluating performance. Each team member has 3-5 goals they are responsible for completing before the end of each fiscal year.

   Managers conduct evaluations and ensure their assigned staff members meet job requirements and perform their principal job functions. Managers also conduct individual monthly meetings with team members. This enables supervisors to provide feedback on individual performance.

   The agency has further enhanced the performance management system in critical areas of performance planning, performance execution, performance assessment, and performance review, through its implementation and utilization of the District Government's Performance Management process.

5. **Please provide the following for each collective bargaining agreement that is currently in effect for agency employees:**
   - **a. The bargaining unit (name and local number);**
   - **b. The start and end date of each agreement;**
   - **c. The number of employees covered;**
   - **d. Whether the agency is currently bargaining;**
   - **e. If currently bargaining, anticipated completion date;**
   - **f. For each agreement, the union leader's name title and contact information; and**
   - g. **A copy of the ratified collective bargaining agreement.**
     Not applicable to OPC.

6. **Please list all <u>employees currently detailed</u> to or from your agency. For each detailed employee, include: (***see table below***)**
    a. **The reason for the detail;**
    b. **The job duties if detailed to your agency;**
    c. **The start date of detail;**
    d. **The agency the employee is detailed to/from; and**
    e. **The projected date of return.**

Employee	Reason for Detail	Detail start date	Agency detailed To / From	Projected date of return
Abigail Marcus-Garvie	Personnel Matters	4/17/15	**From:** Office of the People's Counsel; **To:** DC Department of Human Services	Undetermined

7. **Please provide a copy of your agency's Schedule A, as of the date of receipt of this questionnaire. (***see link below: attachment 3 Position Funding Report***)**

    DJ0 FY26_Position Funding Report_12-29-2025.xlsx

8. **Please provide a list and description of all memorandums of understanding and memorandums of agreement in effect during [previous fiscal year] and [current fiscal year], to date.**

- Revised Telework Policy
- Americans with Disabilities Act Policy
- Voluntary Leave Transfer Program Agreement

<u>Finance and Budget</u>:

9. **Please provide a status report, including timeframe of completion, for all projects for which your agency currently has <u>capital funds</u> available.**

Not applicable to OPC.

10. **Please provide copies of all budget enhancement requests (The Form B or similar form) submitted in the formulation of the FY25 and FY26 proposed budgets.**

This request asks for information that is protected from disclosure by the deliberative process and executive privileges.

11. **Please list all budget enhancements in FY26 and provide a status report on the implementation of each enhancement.**

This request asks for information that is protected from disclosure by the deliberative process and executive privileges.

12. **Please fill out the attached spreadsheet titled "Question 12 Grants Received," and list all federal and/or private grants received by your agency in FY25 and FY26 to date, current balances, and indicate any that lapsed during or at the end of [previous fiscal year].**
    a. **Please submit the completed document in both Excel and PDF formats.**
    b. **Please include your Agency Code in the filename (e.g., question_12_AB0_2026.xls).**

Not applicable to OPC.

13. **List all grants issued by your agency in FY25 and FY26, to date in the attachment labeled "Question 13 Grants Issued".**

a. **Please submit the completed document in both Excel and PDF formats.**
b. **Please include your Agency Code in the filename (e.g., Question_13_AB0_2026.xls).**

Not applicable to OPC.

Operations:

14. **Please provide the Committee with a list of all vehicles owned or leased by the agency; the purpose of the vehicle; the division the vehicle is assigned to, if applicable; and whether the vehicle is assigned to an individual employee.** **(***See table below & Attachment #4 (OPC Vehicle List*)**:**

FY2025-2026					
	Year	**Make & model**	**Agency Lease or Own**	**Assigned to**	**Accident(s)**
	2019	Grand Caravan	Agency Owned	N/A	None
	2019	Grand Caravan	Agency Owned	N/A	None
	2019	Chevrolet Bolt EV	Agency Water Services Division	N/A	None

15. **For each objective and activity in the agency's FY25 Performance Plan, please list:**

a. **The measure of greatest improvement for the agency, and the actions the agency took to improve that measure's outcome, efficiency or quantity; and**

The Water Summit served as a primary catalyst for the agency's improved engagement metrics.

Key Highlights of the Water Summit

- 700+ Attendees: Strong turnout from residents across the District.
- Diverse Participation: Included keynote speakers, utility agencies, and community organizations.
- Comprehensive Support: Provided resources, education, and direct assistance to residents.
- Focus on Equity: Ensured representation from underserved wards and addressed pressing utility issues.

Impact

- Increased awareness of consumer rights and available programs.
- Strengthened relationships with stakeholders (DC Water, other agencies).
- Positioned OPC as a trusted advocate and resource hub for residents.

Opportunities to Build on this Success

1. Annual Water Summit: Make it a signature event with expanded topics (energy and sustainability).
2. Ward-Specific Mini Summits: Host smaller, localized events in Wards 5, 7, and 8 to maintain momentum.
3. Digital Engagement: Record sessions and share highlights online for residents who couldn't attend.
4. Feedback: Collect attendee feedback to improve future events and identify emerging issues.

Measure: The number of general consumer inquiries regarding programs, assistance, or services.

- This measure showed the greatest improvement because inquiries significantly increased, reflecting stronger community engagement and awareness of agency services.
- Established citywide partnerships to expand reach and collaboration.
- Conducted community meetings and outreach events to connect directly with residents.
- Implemented diverse advertising strategies, including newsletters and targeted campaigns, to inform the public about available programs and assistance.

b. For all measures with missed targets (if any), explain the actions the agency is taking to improve that measure's outcome, efficiency, or quantity.

The Office is pleased to report that there were no missed targets for the performance measures identified in the FY25 Performance Plan.

16. List all new objectives, activities and projects in the agency's [current fiscal year] Performance Plan and explain why they were added.

FY 26 Projects

Quarterly Social Service Summit Meetings (Pepco, Washington Gas, Telephone)
The Quarterly Social Service Summit is a collaborative forum hosted by the Office of the People's Counsel (OPC) Consumer Services Division. It brings together representatives from all major utility agencies in the District and provides an open platform for residents to engage directly with service providers. We discuss utility trends, reviewing current and emerging trends that impact utility services across the district. Speakers share updates. Utility companies present updates on programs, assistance options, and service improvements for residents. Highlight daily operations to learn what each utility does to maintain reliable service and support customers. Resident Engagement to open a Q&A session for residents to ask questions and share concerns. Collaborative Innovation, including brainstorming new strategies to ensure residents maintain utility services year-round.

Anacostia Adopt -A- School Program
The Office of the People's Counsel (OPC) serves as a School Program Provider and District of Columbia Public Schools Partner with Anacostia High School. OPC sponsors a Youth-Powered Climate Action Initiative Program (the "Program"). The Program intends to empower Anacostia High School's environmentally focused youth to become informed advocates for their community and environment through environmental justice workshops and curriculum. The interactive workshops focus on building community advocacy skills on utility rates, environmental justice, and policymaking. Additionally, the sessions educate students in career exploration in sustainability, energy, and law.

OPC Agency Climate Change Conference
OPC will sponsor a one-day "Youth Climate Summit" for Gen Z, and millennials. The event is aimed to educate the youth on: "What is Climate Change 101?" "Climate Resiliency," "Climate Advocacy" and "How to Prepare for a Green Future with Green Jobs." OPC's Youth Climate Summit brings together industry experts, climate change

activists, influential figures, and others who will activate youth advocacy in DC and inspire transformational climate change solutions. Additionally, the "Youth Climate Summit" is an opportunity to connect to the next generations of change makers who are at the forefront of climate change activism. A tangible benefit to the summit is that OPC educates the youth to become Climate Change Ambassadors in their communities and to use their voices for policy change and advocacy.

FC 1167 - Utility Climate Business Plan

The Climate Business Plan proceeding is the Commission's proceeding to review how electric and gas utilities propose to address the District's climate laws and emissions-reduction requirements and to facilitate transportation and building electrification while providing safe and reliable service. Utilities must show how their long-term investment plans, infrastructure proposals, and spending decisions support the district's climate commitments, including greenhouse gas emissions reduction targets and the avoidance of stranded investments and unnecessary customer costs. The proceeding will help provide the Commission, policymakers, and the public with greater transparency into whether utility plans align with the District's clean energy transition. OPC's position is that affordability and equity must be at the center of the Commission's review and decision-making so that progress on the District's climate goals does not have a disproportionate impact on low-income and vulnerable residents.

17. Describe problems and challenges, including chronic maintenance issues and design flaws, in agency-owned or leased facilities. (*see response below***):**

OPC leases approximately 21,030 square feet of office space at 655 15th Street NW from Boston Properties. The flaws: The space design includes concrete floors, concrete walls, and concrete pillars with a predominantly open floor plan with cubicles bordered by offices. The challenge- A substantial component of OPC's work involves engaging and assisting residents through in-person meetings, phone calls, and other outreach activities. Unfortunately, OPC's mission and vision are challenged by its current office space design. OPC's open floor plan design is not well-suited for in-person meetings or telephone engagement and conversations with residents, as sound bounces off the concrete floors and walls. The current design does not allow for private discussions with residents about issues, concerns, and problems they are facing with their utilities, and at the same time, the noise created by multiple concurrent conversations in the open space negatively impacts customer engagement. Additionally, OPC's outreach and engagement plans include the production, distribution, and airing of podcasts where important information, discussion, engagement, and the dissemination of vital information and tools related to utilities could be created and shared. However, the space initially designed to accommodate the podcast is inadequate in size and function and is also ill-equipped. To address these flaws and challenges, OPC is working with DGS to execute renovations to create more actual offices

and enclosed conference spaces for client engagement in its current space. Additionally, DGS is assisting with the acquisition of additional space in the current building to design and build a state-of-the-art podcast studio to produce, distribute, and air podcast programs to assist and provide residents with information and the tools to address their utility issues and concerns. These renovations and the acquisition of the additional space will satisfactorily address and eliminate the challenges and flaws OPC is experiencing.

a. What capital or operating projects arose from these issues in FY25 and FY26 to date, including cost and actions taken? (*see response below***):**

As a result of the flaws and challenges in OPC's office design, OPC is working with DGS to execute renovations to its current space to create more actual offices and enclosed conference spaces for client engagement. Additionally, DGS is assisting with the acquisition of additional space in the current building to design and build a state-of-the-art podcast studio to produce, distribute, and air podcast programs to assist in providing residents with information and the tools to address their utility issues and concerns. DGS has engaged the building landlord (BXP), and a letter of intent has been executed between DGS, OPC, and BXP. The estimated cost for renovations and the build-out is $ 724,561.

18. Please list each new initiative implemented by the agency during FY25 and FY26 to date. For each new initiative, please provide:

c. A description of the initiative; The Office of the People's Counsel (OPC) serves as a School Program Provider and District of Columbia Public Schools (DCPS) Partner with Anacostia High School. OPC sponsors a Youth-Powered Climate Action Initiative Program (the "Program"). The Program intends to empower Anacostia High School's environmentally focused youth to become informed advocates for their community and environment through environmental justice workshops and curriculum. The interactive workshops focus on building community advocacy skills on utility rates, environmental justice, and policymaking. Additionally, the sessions will educate the students on career opportunities in sustainability, energy, and law in the utility arena.

d. Actual start date; December 4, 2025 (MOU with Anacostia was approved by DCPS on August 19, 2024).
e. Actual or anticipated end date; September 30, 2027
f. The funding required to implement the initiative; $40,000
g. Whether the initiative was mandated by legislative action; No
h. Problems or challenges faced in the program's implementation; N/A

i. The metrics the agency is collecting to measure the initiative's success; and – polling and surveys with responses from teachers and students.
j. An assessment of the initiative's success thus far. Successful 21-member team to facilitate engaging and interactive workshops and curriculum with buy-in and support from the Anacostia HS administration.

19. Please list any legislation that impacts your agency from FY25 and FY26 and provide a status report on the agency's implementation related to each piece of legislation.

OPC has not identified any legislation in FY25 or FY26 that impacts its functioning and/or operation.

20. Customer feedback

a. How does the agency solicit <u>feedback</u> from customers (i.e., District residents served)? Please describe.

<u>Current Feedback Process</u>

- Survey Trigger: Sent when a case is created in the CMS system.
- Questions Include:
  - How was the service provided?
  - What could be improved from a utility standpoint?
- Data Use: Responses are compiled and analyzed.
- Collaboration: OPC works with utility agencies to address recurring issues and develop solutions.

b. What has the agency learned from this feedback?

<u>Key Insight from Survey Feedback</u>

- Mass Shortage of Assistance Programs: Residents consistently report that available financial aid is insufficient or inaccessible.
- Impact: Increased risk of arrears, disconnections, and financial stress, especially in Wards 5, 7, and 8.
- Root Cause: Programs have dwindled while utility costs remain high, creating a gap between need and support.

<u>Next Steps to Address This</u>

1. Identify Gaps and Opportunities

a. Map existing assistance programs and compare them to average utility costs.
b. Highlight eligibility barriers that exclude vulnerable households.

2. **Advocate for Expansion**
    a. Work with the Public Service Commission, DC Water, and other utilities to restore or increase funding.
    b. Push for new programs or enhancements (e.g., income-based billing, arrearage forgiveness).
3. **Leverage Partnerships**
    a. Collaborate with nonprofits and community organizations to provide emergency aid.
    b. Explore federal or local grants to supplement assistance programs.
4. **Communicate Findings**
    a. Share survey insights in reports to policymakers and stakeholders.
    b. Use data to demonstrate the urgency and equity implications.

i. How has the agency changed its practices because of such feedback?

<u>How OPC Has Changed Its Practices</u>

- Data-Driven Decision Making: OPC now compiles survey feedback and identifies the most common trends (e.g., financial assistance shortages).
- Solution-Oriented Approach: Instead of just reporting issues, OPC collaborates with agencies and stakeholders to create actionable programs.
- Example – Financial Assistance Shortage:
    - Survey data revealed a major gap in available aid for utilities, especially water bills.
    - OPC partnered with DC Water and external stakeholders to design programs like payment plans with forgiveness credits, helping residents reduce arrears faster.
    - This proactive approach prevents disconnections and restores trust between residents and utility providers.

<u>Impact</u>

- Residents receive tangible relief rather than just information.
- Agencies and utilities are aligned with consumer needs, improving service delivery.
- OPC strengthens its role as a consumer advocate and problem solver.

Laws, Audits, and Reports:

21. Please identify any legislative modifications that would enable the agency to better meet its mission.

OPC supports legislative modifications that strengthen consumer protections, expand access to affordability programs, and enhance transparency in utility operations. To better meet its mission of ensuring equitable, reliable, and affordable utility services for District residents, the agency identifies the following legislative priorities and recommended modifications.

The DC Water Billing and Disconnection Modernization Amendment Act of 2025 (Bill 26-443) aims to enhance transparency and provide stronger protections for District residents facing water service shutoffs. This legislation requires the DC Water and Sewer Authority to establish an amnesty program for outstanding balances and creates clear, consistent timelines for the disconnection process, including extended windows for seniors and residents with disabilities. The bill addresses inequities in multi-unit buildings by allowing tenants to establish service in their own names if a landlord fails to pay a master-metered bill, and it prohibits disconnections during periods of extreme weather. Adding provisions that clarify legal procedures for multi-unit tenants would further reduce billing inequities and prevent service disruptions for vulnerable populations.

The Automatic Enrollment for Utility Affordability Programs Act of 2025 (Bill 26-243) seeks to increase participation in financial assistance programs by removing administrative hurdles for income-qualified households. The bill directs the Department of Energy and Environment to create a system that automatically enrolls eligible residents into utility discount programs, such as LIHEAP and the Clean Rivers Residential Relief Program, based on their participation in other programs like SNAP or Medicaid. By requiring data-sharing between the Department of Human Services and the Department of Health Care Finance, the legislation aims to reach thousands of eligible residents who currently miss out on assistance.

Overall, the passage of these legislative measures would enable the agency to better fulfill its mission of ensuring that all District utility consumers receive safe, affordable, and equitable services.

22. Please identify any regulatory <u>impediments</u> to your agency's operations.

OPC identifies a significant regulatory impediment regarding its lack of jurisdiction over third-party utility suppliers. When a property owner or resident enrolls with a third-party supplier, the agency is legally restricted from representing the consumer in disputes or complaints. This limitation creates a gap in advocacy for residents facing billing errors, service issues, or contract disputes with these entities. Consequently, this leads to

increased consumer frustration and confusion, as residents often expect the agency to intervene in all utility-related matters.

This impediment is significant because third-party suppliers often utilize aggressive marketing tactics, which can lead residents to unknowingly sign contracts with unfavorable terms. Vulnerable communities, including those in Wards 5, 7, and 8, are disproportionately affected due to a lack of resources and awareness of these specific market risks.

To address these challenges, the agency has identified the following potential solutions:

1. Consumer Education: Launching campaigns to explain the risks and responsibilities associated with third-party enrollment and providing guidance on verifying legitimacy to avoid predatory practices.
2. Policy Advocacy: Working with the Public Service Commission to explore regulatory modifications that could expand the agency's authority or create stronger consumer protections, such as mandatory transparency and simplified opt-out provisions in third-party contracts.
3. Referral Network: Establishing partnerships with legal aid organizations and consumer protection agencies to assist residents in disputes that fall outside of the Office's current jurisdiction.

From the perspective of the Litigation Services Division, there are no legislative requirements for which the Office lacks resources to properly implement OPC's operations.

23. Please list and describe any ongoing investigations, audits, reports on your agency or any employee of your agency, or any investigations, studies, audits, or reports on your agency or any employee of your agency that were completed during FY25 and FY26 to date. (Coard)

OPC is not aware of any ongoing investigations, audits, reports, or studies completed during FY25 or FY26.

24. Please identify and provide an update on what actions have been taken to address all recommendations made during the previous three years by:

a. Office of the Inspector General;
b. D.C. Auditor;
c. Internal audit; and
d. Any other federal or local oversight entities.

In FY25, the OIG conducted the FY25 audit. OPC had to provide information on sample procurements that were selected for review. OPC provided the requested information, and no further action was requested.

In FY23, the OIG conducted the FY23 audit. OPC had to provide information on sample procurements that were selected for review. OPC provided the requested information, and no further action was requested.

25. Please list all pending lawsuits in which the agency, or its officers or employees acting in their official capacities, are named as defendants, and for each case provide the following:

a. Charge of Discrimination
b. Equal Employment Opportunity Commission
c. EEOC: 570-2026-00184
d. OPC Position Statement Filed 11/24/2025
e. Allegations of discrimination and retaliation

26. Please list the total amount of money the agency or the District, on behalf of the agency, expended to settle claims against it, or its officers or employees acting in their official capacities, in FY25 and FY26 to date.

Not applicable to OPC.

27. Please list each settlement the agency or the District, on behalf of the agency, entered into in FY25 and FY26 to date that involved claims against the agency, or its officers or employees in their official capacity, including any settlements covered by D.C. Code § 2-402(a)(3). For each settlement, provide:

a. The amount of the settlement;
b. If related to litigation, the case name and brief description; and
c. If unrelated to litigation, please describe the underlying issue or reason for the settlement (e.g. administrative complaint, etc.).

Not applicable to OPC.

28. Please list all administrative complaints or grievances that the agency received in FY25 and FY26 to date. For each complaint, list:

a. The source of complaint;
b. The process utilized to respond to the complaint or grievance;
c. Any changes to agency policies or procedures that resulted from the complaint or grievance; and
d. If resolved, describe the resolution.

Not applicable to OPC.

29. Is the agency currently party to any active non-disclosure agreements? If so, please provide all allowable information on all such agreements, including:

a. The number of agreements;

b. The department(s) within the agency associated with each agreement; and
c. Whether any agreements are required for specific positions (please list each position by division and program and indicate whether the position is contracted)

Not applicable to OPC.

Data

30. **In filterable and sortable spreadsheet, please list all electronic databases maintained by your agency, including the following: *(see response and link below):***

a. A detailed description of the information tracked within each system;
b. The age of the system and any discussion of substantial upgrades that have been made or are planned to the system; and
c. Whether the public can be granted access to all or part of each system.

(See attachment # 4 OPC Database)

OPC Database Info

Electronic Databases Maintained by the Office of the People's Counsel (OPC)

1. Description of Information Tracked Within Each System

Consumer Information Database (CID)

Purpose: The Consumer Information Database (CID) is used by the Consumer Services and Water Services Divisions to log, track, and manage consumer inquiries and complaints related to utility services in the District of Columbia.

Information and Functions Tracked:

- Consumer Inquiries and Complaints: Records, inquiries, and complaints received through multiple channels, including telephone, email, facsimile, in-person visits, and community meetings.
- Community Outreach and Education: Tracks outreach and educational meetings attended by OPC staff, including meeting purposes, topics discussed, attendance, and concerns raised by community members.
- Language Access Compliance: Records complaints in multiple languages to ensure compliance with the DC Language Access Law and equitable access for all residents.
- Complaint Resolution Chronology: Documents the full lifecycle of each complaint, including interactions between the complainant, utility companies, and OPC staff.

- Consumer Information: Captures detailed consumer data such as name, address, contact information, gender, utility account numbers, complaint type, utility involved, and resolution status.
- Reporting and Data Retrieval: Supports the generation of daily, monthly, quarterly, and annual reports for management review and regulatory oversight.

2. ***Age of the System and Substantial Upgrades***

ServiceNow (Upgrade from CID)

System Age: The original CID was developed in 1998 and had been in use for approximately 28 years. To modernize and enhance system functionality, the CID was recently upgraded to the ServiceNow platform.

Key Enhancements and Capabilities:

- Improved Responsiveness: Enables faster intake, tracking, and resolution of consumer inquiries, improving overall service delivery.
- Enhanced Information Management: Provides modern tools for managing consumer complaint data more efficiently and accurately.
- Complaint Logging and Tracking: Maintains all core CID functions while improving reliability and usability.
- Community Outreach Tracking: Allows detailed tracking of outreach activities, attendance, subject matter, and consumer concerns.
- Language Access Tracking: Continues to support multilingual complaint tracking in compliance with the DC Language Access Law.
- Complaint Resolution Timeline: Automatically creates a detailed chronology of complaint handling, documenting all interactions and actions taken.
- Reporting and Analytics: Enables customized data extraction and reporting for operational and performance analysis.

Planned and Ongoing CMS Projects:

· Conduct a comprehensive review of the current ServiceNow configuration to identify complexity and performance bottlenecks and develop a prioritized refactoring plan.

· Integrate a solar customer satisfaction survey into the Consumer Management System (CMS).

· Integrate social services data to enhance consumer support and coordination.

· Implement trend analysis to identify recurring consumer issues, monitor seasonal patterns, and proactively address emerging concerns.

· Develop dashboards displaying daily accepted cases, unassigned cases, and the age of the oldest unassigned cases.

· Create automated scripts to flag cases as high priority once they exceed defined age thresholds.

· Implemented in the Water Services Division an Adobe Digital Sign to have the consumer electronically sign the OPC water consent form in the CMS system

Ongoing enhancements to the Consumer Information Database and ServiceNow platform ensure OPC can continue to serve the public effectively while maintaining compliance with legal and regulatory requirements.

3. Public Access to the System

Public Access Policy: The Consumer Information Database (CID), including its ServiceNow implementation, is not accessible to the public. All information contained within the system is used exclusively for internal operations and is maintained as confidential to protect consumer privacy and sensitive personal information.

31. Please provide a list of all studies, research papers, and analyses ("studies") the agency or an agency's employee requested, prepared, presented or contracted for during FY25. For each study please list:

a. The status;
b. The purpose; and
c. A link (if published) to the study, research paper or analysis.

Drivers of PJM's Capacity Market Price Surge and its Impacts on Electricity Consumers in the District of Columbia Bill and Rate Impacts Associated with Recent and Upcoming Changes to PJM's Capacity Market Prepared for the Office of the People's Counsel for the District of Columbia Completed: April 25, 2025.

This study was done to explain the Base Residual Auction that takes place annually at the PJM and discuss the factors that lead to the large price increase.

Energy Affordability in Washington, DC Tracking and Enhancing Energy Affordability for District Residents Prepared for the Office of the People's Counsel for the District of Columbia Completed: September 25, 2025

This study was done to establish an affordability framework the measures the energy burden in the District of Columbia and to measure and assess the impact of energy assistance programs and utility discount rates

32. Please list contracts and procurements awarded, entered into, extended, or for which an option year was exercised, by the agency during FY25 and FY26, to date in the attached spreadsheet titled "Contracts and Procurements". (*see links below***)**

a. Please include your Agency Code in the filename (e.g., AB0_2026_Contracts and Procurements.xls).

b. **You may add additional lines to the sheet but please do not change any other formatting.**
(*See Attachment 6a Contracts & Procurements FY25 & 6b FY27*)

Question 32 Contracts and Procurements FY25.xlsx
Question 32 Contracts and Procurements FY26.xlsx

OPC PERFORMANCE OVERSIGHT HEARING

Response to Supplemental Question #9

PJM Task Force Report, Part 1

ATTACHMENT 1

Attachment #1

OPC Performance Oversight Hearing

Response to Supplemental Question #9

PJM Task Force Report, Part 1.

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Office of the People's Counsel
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Sandra Mattavous-Frye, Esq.
People's Counsel

July 31, 2025

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

RE: FORMAL CASE NO. 1183, IN THE MATTER OF THE INVESTIGATION INTO THE IMPACT OF THE PJM CAPACITY AUCTION AND THE ESTABLISHMENT OF THE PJM CAPACITY AUCTION TASK FORCE

Dear Ms. Westbrook-Sedgwick:

Attached is the *Phase 1 PJM Capacity Auction Task Force Report*, which is being filed pursuant to Commission orders in the above-captioned case. The members of the task force include Office of the People's Counsel, Potomac Electric Power Company, Department of Energy and Environment, the Apartment and Office Building Association of Metropolitan Washington ("AOBA"), PJM Interconnection, LLC, DC Sustainable Energy Utility, and DC Office of the City Administrator.

If there are any questions regarding this matter, please contact me at 202.727.3071

Sincerely,

/s/ Ankush Nayar
Ankush Nayar
Assistant People's Counsel

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

In the Matter of the Investigation Into	§	
the Impact of the PJM Capacity Auction	§	
and the Establishment of the PJM	§	**Formal Case No. 1183**
Capacity Auction Task Force	§	

PHASE 1 REPORT OF THE PJM CAPACITY AUCTION TASK FORCE

I. INTRODUCTION

The PJM Capacity Auction Task Force ("Task Force") submits the Phase 1 Task Force Report, pursuant to the directives of the Public Service Commission ("Commission") of the District of Columbia. In response to a petition submitted by the Office of the People's Counsel for the District of Columbia ("OPC"), the Commission opened Formal Case No. 1183, establishing the Task Force to "(1) study the immediate and long-term financial impact of the July PJM capacity auction, (2) develop a robust education and outreach plan to assist consumers in understanding and preparing for the new charges set to take effect in June 2025 and (3) learn what changes Pepco will make to its business strategy in light of the capacity auction" and to submit its findings in a report.[1] The Commission subsequently issued Order No. 22425, establishing July 31, 2025, as the deadline for this report.[2] The Commission indicated that this report will constitute phase 1 of a two-part report.[3] Phase 2 will cover additional issues and is due on October 31, 2025.[4]

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1 *Formal Case No. 1183, In the Matter of the Investigation into the Impact of the PJM Capacity Auction and the Establishment of the PJM Capacity Auction Task Force ("Formal Case No. 1183")*, Order No. 22334, ¶¶ 2, 4, rel. December 9, 2024 ("Order No. 22334").

2 *Formal Case No. 1183*, Order No. 22425, ¶ 1, rel. May 29, 2025 ("Order No. 22425").

3 *Id.*

4 *Id.*

II. BACKGROUND

On October 15, 2024, "OPC" filed a petition seeking to open an investigation into "the significant consequences" of the PJM Interconnection, LLC, 2025/2026 Base Residual Auction ("BRA"), *i.e.*, the "capacity auction."[5] The results from that auction, held in July of 2024, resulted in a seven-fold increase in PJM wide capacity costs, from $2.2 billion to $14.7 billion.[6] OPC requested that the Commission establish a task force to "(1) study the immediate and long-term financial impact of the July PJM capacity auction, (2) develop a robust education and outreach plan to assist consumers in understanding and preparing for the new charges set to take effect in June 2025 and (3) learn what changes Pepco will make to its business strategy in light of the capacity auction."[7]

On December 9, 2024, the Commission issued Order No. 22334, which opened Formal Case No. 1183 and granted OPC's request for a task force and investigation. The Commission directed that the Task Force develop a recommendation report, citing the need for "immediate action" and for "a coherent local strategy" with respect to the capacity auction, particularly as the auction pertained to wholesale prices beyond the control of the Commission.[8] Interested parties

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[5] *General Docket No. 2024-20-M, In the Matter of the Petition for an Investigation into the Impact of the PJM Capacity Auction and a Request for the Establishment of a Task Force to Develop Solutions,* ("*GD-2024-02-M*"), Office of the People's Counsel for the District of Columbia's Petition for an Investigation into the Impact of the PJM Capacity Auction and a Request for the Establishment of a Task Force to Develop Solutions, p.1, filed October 15, 2024 ("OPC Petition").

[6] *See* 2025/2026 Base Residual Auction Report at 4. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

[7] *Formal Case No. 1183*, Order No. 22334, ¶ 2.

[8] *Id.* ¶ 4.

were directed to file a request to be appointed to the Task Force within 30 days from the date of the order.[9]

The Task Force consists of OPC, Potomac Electric Power Company ("Pepco"), Department of Energy and Environment, the Apartment and Office Building Association of Metropolitan Washington ("AOBA"), PJM, DC Sustainable Energy Utility ("DCSEU"), and DC Office of the City Administrator.

Commission Staff requested that OPC lead the Task Force, to which OPC agreed . On January 31, 2025, the Task Force held its initial meeting. Over the past six months, the Task Force has held ten meetings and also filed an interim report explaining education and outreach steps taken by Task Force members in their individual capacity. The Commission subsequently established a deadline for July 31, 2025, for filing this report. [10]

III. DISCUSSION

The Report will cover the three topics discussed in Order No. 22334 sequentially: (1) Rate Impacts from the auction; (2) Education and Outreach; and (3) learned changes to Pepco's business strategy. Consensus items are included first under each section, followed by member-specific comments, which are designated as such.

A. Financial Impacts from the 2025/2026 Base Residual Auction

PJM is the regional transmission organization (RTO) that coordinates the movement of wholesale electricity across the District of Columbia and 13 states. To ensure sufficient electricity is available to meet peak demand, such as on the hottest and coldest days of the year, PJM operates

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9 *Id.*

10 *Formal Case No. 1183*, Order No. 22425, ¶ 1, rel. May 29, 2025.

a capacity market known as the PJM Reliability Pricing Model (RPM).[11] The RPM is designed to provide grid reliability and incentivize new generation through a market-based auction known as the PJM Base Residual Auction (BRA), *i.e.*, the "capacity auction."[12] In July 2024, PJM held the BRA for the 2025/2026 delivery year for its entire footprint, including the Pepco load zone. This auction resulted in the highest capacity prices ever seen in the region, which went into effect June 1, 2025 and will remain in place until May 31, 2026.[13]

The Pepco Zone, in which the District of Columbia is located, saw a five-fold increase in capacity prices with the capacity clearing prices increasing from $49.49/MW-day in 2024/2025 to $269.92/MW-day for 2025/2026.[14] The Pepco Zone cleared at the PJM system-wide clearing price and did not experience higher price separation like those in the nearby Baltimore Gas and Electric (BGE) and Dominion zones, which experienced clearing prices of $466.35/MW-day and $444.26/MW-day respectively due in part to transmission constraints.[15] The PJM auction results impacted Pepco's Standard Offer Service (SOS) rates as well as competitive supply rates in the District, as these results reflect wholesale capacity costs across the PJM footprint including the District of Columbia.[16]

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11 Synapse Energy Economics, Inc., *Drivers of PJM's Capacity Market Price Surge and its Impact on Electricity Consumers in the District of Columbia* at 1 (April 25, 2025), https://opc-dc.gov/pjm-capacity-market-report-april-25-2025/ (Synapse Report).

12 *Id.* at 1-2.

13 *Id.* at 5.

14 *Id.*

15 2025/2026 Base Residual Auction Report at 6. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf

16 For further comparison, the Zonal Net Load Price, which is what the PEPCO DC load pays, cleared at $49.68/MW-day for the 2024/25 Delivery Year and $270.35 per MW-Day for the 2025/26 Delivery Year.

SOS is the default supply service Pepco administers, and SOS supply is procured through an auction process, which the Commission, the Commission's independent market monitor, and OPC oversee. SOS supply is procured in increments over a three-year period to protect customers from large energy price shifts and is comprised of energy, capacity and renewable energy credits required to meet the District of Columbia's renewable portfolio standards. Because the PJM capacity auction has not been run on a consistent, three-year forward schedule, a proxy capacity price is provided to suppliers within the Commission-approved annual Request for Proposals (RFP) to utilize for periods in which the PJM capacity price is unknown. The proxy price serves as a placeholder and does not impact the competitive rate. Once the actual clearing price is known, Pepco adjusts the proxy price for the actual price for the winning suppliers when calculating the SOS rates, such as those recently approved in Order No. 22412.[17]

On June 1, 2025, the SOS increase went into effect for Pepco DC customers. Pepco analyzed the incremental monthly bill impact of the capacity results, as shown in the table below. The May 2025 amount represents the monthly bill before the impact of the capacity auction results, and the June 2025 amount represents the monthly bill with the addition of the impact of the capacity auction results. The resulting monthly bill changes, are shown below for select customer classes:

Capacity Auction Monthly Bill Impacts

	Estimated kWh usage	2024/2025	2025/2026	Monthly Bill Change
Residential	614	$3.08	$12.28	$9.21
GSND	906	$4.53	$18.12	$13.59
MGTLV	65,571	$327.86	$1,311.42	$983.57

[17] *Formal Case No. 1017, In the Matter of the Development and Designation of Standard Offer Service in the District of Columbia ("Formal Case No. 1017)*, Order No. 22412, rel. May 7, 2025.

At the request of Task Force members, Pepco also prepared calculations of the monthly bill impacts from the capacity auction for residential and commercial customers who use more than the average amount of electricity at the request of Task Force members. The Table below provides bill impact calculations for certain customer classes at different levels of usage:

Variation in Capacity Auction Bill Impacts by Usage

	Estimated kWh usage (75th Percentile)	**2024/2025**	**2025/2026**	**Monthly Bill Change**
Residential	921	$4.61	$18.42	$13.81
GSND	1,359	$6.80	$27.18	$20.38
MGTLV	98,357	$491.79	$1,967.14	$1,475.35

	Estimated kWh usage (90th Percentile)	**2024/2025**	**2025/2026**	**Monthly Bill Change**
Residential	1,105	$5.53	$22.10	$16.57
GSND	1,631	$8.16	$32.62	$24.46
MGTLV	118,028	$590.14	$2,360.56	$1,770.42

Following the PJM capacity auction, Governor Joshua Shapiro of Pennsylvania filed a complaint against PJM in December 2024 challenging the structure of the auction. Both parties reached a settlement requiring the establishment of an auction cap of $325/MW-day and a floor of $175/MW-day for Delivery Years (DY) 2026/27 and 2027/28. These changes were filed with the Federal Energy Regulatory Commission ("FERC"), which approved the proposed cap and floor.[18] Based on these parameters Pepco provided the forecasted potential monthly bill impact to residential customers based on if the DY2026/27 BRA would have a capacity clearing price at the market cap, floor and the mid-point.

[18] *PJM Interconnection, L.L.C., Commonwealth of Pennsylvania v. PJM Interconnection, L.L.C.*, 191 FERC ¶ 61,066 at P 51 (2025).

Capacity Auction Forecasted Residential Monthly Bill Impacts – DY 26/27

Clearing Price	May 2026	June 2026	Monthly Bill Change
Cap - $325/MW-day	$12.28	$15.35	$3.07
Median - $250/MW-day	$12.28	$11.67	$(0.61)
Floor - $175/MW-day	$12.28	$7.98	$(4.30)

In addition to rule changes discussed above, the changes below have also been implemented into the PJM capacity auction rules since the DY 2025/2026 BRA and prior to the DY 2026/2027 BRA:

- Including Reliability Must Run (RMR) units in the supply curve.[19]
- Retaining the combustion turbine (CT) as the reference resource rather than switching to a combined cycle reference resource to help reduce price volatility.[20]
- Removing must-offer exemptions for intermittent, storage and hybrid resources, thereby requiring these resources to participate in the auction, increasing the available supply.[21]

Furthermore, on February 11, 2025, FERC approved revisions to Part VII of PJM's Open Access Transmission Tariff (Tariff) known as the Reliability Resource Initiative (RRI), which PJM filed on December 13, 2024.[22] The RRI proposal added provisions to the Tariff allowing for a one-time reliability-based expansion that would expedite review of certain generation projects in PJM's interconnection queue, aimed to help address near-term resource adequacy

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19 *PJM Interconnection, L.L.C.*, 190 F.E.R.C. ¶ 61,088, at P 47 (2025).

20 *Id.* at PP. 60, 63, 66-67.

21 *PJM Interconnection, L.L.C.*, 190 ¶ 61,117 at P 1 (2025).

22 *PJM Interconnection, L.L.C.*, 190 F.E.R.C. ¶ 61,084 at P 1 (2025).

concerns.[23] PJM selected 51 projects for a total of more than 9,300 MW of capacity through the RRI.[24] 90% of the projects are expected to be online by 2030, with all projects to be online by 2031.[25]

The capacity auction for the 2026/2027 delivery year began on July 9, 2025, and the results were published on July 22, 2025. The BRA for the 2026/2027 delivery cleared at $329.17.[26]

As AOBA will discuss in Part 2, most AOBA members in the District of Columbia purchase energy in the competitive market. Therefore, calculations of increases in capacity charges based on SOS may not be reflective of the cost impact on commercial and multi-family properties that are served by competitive suppliers.

1. OPC Bill Impacts

OPC procured Synapse Energy Economics, Inc, ("Synapse") to study the BRA and conduct its own bill impact analysis; these findings are included in the Synapse Report, which is publicly available. The analysis yielded slightly different results than those provided by Pepco. Per Synapse, OPC found that the bill impact was $9.75 or approximately $10.00 for residential ratepayers averaging 614 kWh per month over 12 months. This equated to an additional $/kWh

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23 *Id.* at PP 1, 53.

24 https://insidelines.pjm.com/pjm-chooses-51-generation-resource-projects-to-address-near-term-electricity-demand-growth/

25 *Id.*

26 2026/2027 Base Residual Auction Report at 3. July 22, 2025. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2026-2027/2026-2027-bra-report.pdf. The cap/floor prices of $325/$175 initially filed with FERC were based on the preliminary Reference Resource AUCAP Factor; the actual Reference Resource AUCAP Factor resulted in the cap of $329.17. *Id.* at 4 n.1.

of $0.017 for residential ratepayers. The $/kWh impact for commercial customers was $0.016.[27] OPC also found that if the next auction cleared at the price cap, the additional impact would be $1 over the current price for residential ratepayers, and if the auction cleared at the price floor, it would reduce the impact by $5.[28] Synapse anticipated that the most likely scenario for the next auction was a clearing price occurring at or above the market cap.[29] This bore true as the BRA Results for the 2026/2027 delivery cleared at $329.17.[30] All Locational Deliverability Areas ("LDAs") cleared at the cap, including BGE and DOM, which did not experience price separation.[31] The Synapse Report also had predicted this would likely occur for the BGE and DOM LDAs, due to transmission upgrades and two power plants (Brandon Shores and Wagner) returning to the supply curve.[32]

B. Joint Education and Outreach Plan

Per the Commission Order, Task Force members were to "develop a robust education and outreach plan to assist consumers in understanding and preparing for the new charges set to take effect in June 2025."[33] The members of the Task Force shared information on rate impacts, the PJM capacity auction, provided background on outreach activities that their organizations were pursuing individually, and discussed coordinating education and outreach. Ultimately, due to time

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27 Synapse Report at 6.

28 *Id.* at 24.

29 *Id.* at 23-24.

30 2026/2027 Base Residual Auction Report at 3. July 22, 2025. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2026-2027/2026-2027-bra-report.pdf.

31 *Id.*

32 Synapse Report at 24.

33 *Formal Case No. 1183*, Order No. 22334, ¶ 1.

constraints, diverging views on the auction, and the unique needs of the Task Force members to communicate with customers and other stakeholders, a uniform outreach plan could not be crafted. Rather, members followed a "parallel approach" where they used meetings to build further understanding of the rate impacts, worked individually to disseminate information to the broader public, while keeping open the option for collaborative outreach with other members. Accordingly, the section will cover the perspectives of Task Force members in their education and outreach efforts for the Commission's consideration.

1. OPC's Position on the Parallel Approach and Outreach Efforts

OPC has appreciated the opportunity to lead the Task Force thus far and attempted to address the three tasks outlined by the Commission. As noted above, two central challenges were the time it took to understand the impacts from the auction and that parties had divergent views on what information to share. OPC would like to briefly expand on these issues, which will provide useful insight for the Commission moving forward.

i. Understanding the Capacity Auction and its Rate Impacts

Part of the challenge in developing joint education and outreach material was the time necessary to accurately understand the rate impacts, potential causes to the price increase, and the operation of the PJM Base Residual Auction (BRA), which all required multiple meetings. Initial meetings included presentations by PJM on the BRA auction with input from OPC on potential causes for the historic increase in the clearing price. Soon after, the discussion shifted to understanding the rate impacts. Pepco made several presentations on the matter, with OPC sharing its own findings in later meetings.

Pepco's initial presentations provided insight regarding the rate impacts; however, the Company's use of the proxy price as a starting point to measure the change in the average

ratepayer's bill caused confusion – particularly for those less familiar with the SOS bid process. The proxy price is simply a placeholder used in the SOS bid process until the auction is complete; however, it does not represent the actual price charged to ratepayers and does not appear on the bill. Thus, ratepayers would have no familiarity with this number. Therefore, future explanations of ratepayer impacts should measure for change based on the previous capacity price ratepayers are paying.

Additional time was also needed to distinguish the change from winter to summer rates, the change from prior summer rates to new summer rates, and changes in the rates attributable from the recent rate order, Order No. 22328,[34] as well as the total bill impact versus the change strictly from the Capacity Auction. Discussions also noted that affordability programs such as the Residential Aid Discount Program (RAD), which assist low-to-moderate income households with their energy bills, addressed only the distribution side of the bill and would not offset the rise in wholesale costs. Impacts to commercial customers also varied based on the specific customer class. AOBA noted that many of its members did not procure their electricity from SOS, and there remains a much greater range in usage within commercial class customers compared to the residential class. This meant approaching the impact analysis and explaining it based on customer class was considerably different.

ii. Task Force Members did not agree on all issues regarding the capacity price.

The Task Force also did not agree on certain issues pertaining to education and outreach, making a parallel approach preferable. As an initial matter, Pepco's calculations as to the change in impacts from the BRA auction differed slightly from OPC's calculations. Pepco initially

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[34] *Formal Case No. 1176, In the Matter of the Application of Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia* ("*Formal Case No. 1176*"), Order No. 22328, rel., Nov. 26, 2024.

advocated that there should be a specific price cited when discussing the rate impact from the BRA with the general public, while OPC proposed parties could coordinate and provide a range of approximately $9.21 - $10.00 when explaining the impact.[35]

Subsequently, Pepco stated that it did not wish to include a line-item breakdown when explaining the bill impact to customers, concerned that this would increase confusion. There was also a lack of time for Pepco to change the bill inserts that explained the change from winter to summer rates to customers. Other stakeholders, including OPC and AOBA, believed a specific line-item or explanation as to the impacts from the Capacity Auction was needed. The Task Force also did not reach consensus on the principal reasons for the five-fold increase in capacity prices.

Thus, parties ultimately concluded that each task member should pursue their own education and outreach path, while utilizing the meetings to share and build greater understanding of the auction, confirm current and future rate impacts, and note proposed changes submitted before the FERC.

iii. OPC's Education and Outreach

As noted earlier, in response to the results of the 2025/2026 BRA, OPC procured the services of Synapse to analyze and publish its findings on the impacts from the 2025/26 BRA, as well as future impacts based on proposed and adopted market reforms. In April 2025, Synapse completed its report, which was later posted to OPC's website and shared with members of the Task Force. The Synapse Report discusses the rate impacts for the District of Columbia from the 2025/2026 BRA as well as drivers for the rise in auction prices, ongoing changes and proposed

[35] DOEE also noted the value of describing not just the average bill impact but also ranges of price impacts that vary based on usage, particularly in conversations with nonprofits, public officials, and others who field complaints and concerns from residents. Such ranges can help other organizations and people understand and contextualize resident concerns, particularly for high-usage households who will be disproportionately affected by the price increases.

reforms to the Capacity Auction, and projects rate impacts moving forward. The report took slightly longer than anticipated to account for ongoing changes to the auction that were proposed in filings submitted before FERC.

OPC also raised concerns with FERC, joining with other state advocate offices from Maryland, New Jersey, Illinois, and Ohio, in filing a complaint before the federal agency, challenging the market rules that were in place for the 2025/26 Auction.[36] OPC also provided input before FERC on proposed changes by PJM and the settlement agreement between PJM and Pennsylvania, brokered in response to a separate protest filed by Pennsylvania. This settlement agreement proposed a market ceiling on the clearing price for the next auction of $325 per MW-day and a price floor of $175 per MW-day. OPC opposed the price floor but not the price cap. After FERC approved the settlement agreement for both the floor and the cap, Synapse provided a range of outcomes based on different assumptions for new supply entering PJM. OPC shared these findings with the task force, and they are included in the Report.

During this time, OPC has continued to issue press releases and notified ratepayers of the rate impacts in its monthly newsletter. It also held discussions with community leaders and spoke with staff members for the D.C. Council and will continue to look for opportunities to engage with the public. This includes making information about the capacity market accessible to ratepayers in a consumer-friendly format.

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[36] *Joint Consumer Advocates v. PJM Interconnection, L.L.C.*, Docket No. EL25-18-000 (filed November 14, 2024)

2. Pepco's Education and Outreach Efforts

While the Task Force did not have a single communication and outreach plan, communications and outreach were successful. Pepco presented its high-level Communications and Outreach Plan to the Task Force in the March 14, 2025 Task Force meeting.[37]

Pepco is committed to keeping customers and stakeholders informed about changes to their bills and available programs and resources to help them better understand and manage their energy usage to help lower their energy bills or access assistance if needed. This includes a multi-channel approach to reaching customers, including through Pepco's website, direct customer outreach, media engagement, social media, and more. Many of these channels have been used to help inform customers of changing supply rates this summer.

Residential Customers

Pepco launched a centralized location on its website at pepco.com/BillSupport where customers can access information on current rate impacts, energy savings tips, energy assistance programs, frequently asked questions, and more. This page is updated throughout the year to reflect the latest changes or updated program information. Furthermore, this page has been updated to reflect summer supply rate changes. Customers are directed to this page through various outreach materials, including emails, flyers, social media, and advertising.

Residential customers also received direct outreach on summer rate changes through email and bill inserts. This includes a customer email sent on May 5, 2025 and the SOS bill insert included in May residential customer bills. Pepco provided an additional bill insert, LINES, in June bills to provide reminders to customers about rate changes that took effect on June 1, 2025 and resources available to support them. Other direct outreach efforts include in-person events

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[37] *Formal Case No. 1183*, Meeting Minutes from March 28, 2025, Attachment 2, filed April 7, 2025; *Formal Case No. 1183*, *Meeting Minutes,* Attachment 2, filed June 6, 2025.

where customers can speak directly with Pepco representatives and explore options to support them should they need it.

Pepco has leveraged social media channels to share bill education information, promote programs—like budget billing—that can help ease rate changes for customers, provide useful energy saving tips, and more.

Finally, Pepco regularly engages local media to more broadly disseminate information on rate changes, energy savings, and assistance. For example, during the late June heatwave, Pepco distributed a summer savings news release, which led to coverage in multiple print, broadcast, and digital media outlets, helping amplify important energy savings tips as well as energy efficiency programs available through the DCSEU. Pepco has also participated in multiple interviews with news outlets to inform them about supply bill impacts.

Commercial Customers

Pepco's Large Commercial Services team conducted outreach to commercial customers in advance of changing supply rates this summer. This includes direct newsletters sent to commercial customers, which outlined impacts from the PJM Capacity Auction results and potential impacts to supply costs.[38] Pepco also hosted a webinar to help inform commercial customers of rate changes, which customers can still view online (LCS Capacity Market Trends and Solutions | Pepco - An Exelon Company). While many commercial customers often choose a third-party supplier, the capacity auction may impact those suppliers as well, and Pepco encouraged commercial customers to review their rates with their third-party suppliers should they have them.

Stakeholders

[38] https://pepco.mypreferencecenter.com/Newsletter/NewsletterView?newsletterCampaignSendId=50055

Pepco understands that many stakeholders and leaders across the District may receive questions about supply changes and bill impacts this summer. To help those local leaders better understand these changes and impacts, Pepco invited councilmembers/councilmembers staff, ANC commissioners/neighborhood associations, government agencies, and others to attend a series of Pepco-hosted webinars to learn more about expected changes this summer. Stakeholders were provided handouts that they could then share with their constituents should they receive questions on bill impacts. While some residential customers may choose a third-party supplier, the capacity auction may impact those suppliers as well, and Pepco encouraged residential customers to review their rates with their third-party suppliers.

Ongoing Education Efforts

Bill education efforts will continue throughout the year to help customers further understand bill impacts, ways to save energy and money, and how they can access support if necessary. Thes efforts include communications related to Pepco's Customer Relief Fund, which is designed to help limited- and moderate-income Residential customers manage the impact of rising energy supply costs. This fund is promoted through a variety of communication channels, including targeted outreach to customers who may be eligible to apply for assistance.

3. AOBA's Education and Outreach

As was stated earlier in this report, most AOBA members in the District of Columbia purchase energy in the competitive market. Therefore, calculations of increases in capacity charges based on Standard Offer Service are not very useful for AOBA's membership. Further, since AOBA has a diverse membership encompassing several different commercial rate schedules, as well as the master-metered apartment rate schedule, a one size-fits-all approach does not work for

AOBA's membership. Even within the MGT-LV and GT-LV Commercial rate classes, there is a wide variation in usage and different load factors.

Additionally, it is not unusual for some AOBA members to enter into competitive energy supply contracts with capacity charges passed through directly. Other members sign contracts which are fixed price contracts, but subject to contract clauses which allow for changes in law or regulation to be passed through to customers.

Recognizing these differences, AOBA worked with its competitive preferred provider to develop general communications to AOBA's membership. The provider presented a high-level PJM Capacity Update in one of AOBA's energy market update webinars. This update included the information on the auction, timeline, additional changes, and changes for the next two auctions. AOBA also met separately with its preferred provider who communicated what the changes were and how this would impact competitive supply pricing for AOBA members.

AOBA informed its members in newsletters, as well as Board of Directors reports. However, what AOBA found most helpful were individual meetings with its members and their competitive supplier to explain the drivers of the increase, as well as how such increases affected their specific properties. AOBA participated in many of these discussions, as well as discussions with energy brokers who work with AOBA members.

4. DOEE

In the initial months following the 2024/2025 BRA, DOEE and OAG obtained an estimate of the impacts of the capacity auction results on residential customers in DC and shared that estimate with others including the Commission and OPC.[39] DOEE is grateful that OPC and Pepco

[39] See, e.g., *Formal Case No. 1176*, District of Columbia Government's Post Legislative-Style Hearing Brief (Aug. 30, 2024), pp. 8-9 (explaining that "due to these increased capacity prices, an average usage residential customer of Pepco's Standard Offer Service (SOS) in the District of Columbia will [likely] experience a $9.52/month increase on their bill for energy supply.").

subsequently conducted more thorough analyses of the bill impacts of the 2024/2025 BRA on DC residents and businesses, and have used their analyses in subsequent conversations. DOEE has continued to engage in robust education and outreach regarding its energy assistance programs as essential tools to address increases in electricity prices. Finally, DOEE has coordinated with other organizations, such as the DCSEU and Pepco, following the PJM Capacity Auction results to revise outreach and education materials in order to ensure residents and businesses can learn about utility assistance and energy efficiency programs.

5. *PJM's Education and Outreach*

PJM requested to join the Task Force to serve as an educational resource to the members of the Task Force. PJM functions as a nonprofit, is fully regulated by FERC and has one mission: to keep the lights on for the 67 million people served across 13 states and the District of Columbia.

Over the course of the Task Force meetings, PJM provided an in depth education to this Task Force, explaining how the BRA works and describing the underlying factors that caused the sharp rise in BRA prices for the 2025/2026 Delivery Year (see PJM educational slides entitled, *PJM Capacity Market and 2025/26 Base Residual Auction Results, dated February 28, 2025* in PSC docket, FC 1183).[40] In a nutshell, the BRA price increase was due to decreased electricity supply caused primarily by a large number of generator retirements, combined with increased electricity demand and implementation of FERC-approved market reforms. PJM has been warning of its concerns on this impending supply/demand imbalance and expected price increases for some years now, both at the state and federal levels.

The amount of supply resources in this auction continued to decrease as has been the trend for recent auctions. The reliability concerns associated with reducing supply and increasing

[40] *Formal Case No. 1183*, Meeting Minutes from February 28, 2025, Attachment 2, filed March 11, 2025.

demand are not limited to PJM; the North American Electric Reliability Corporation (NERC) has identified elevated risk to the reliability of the electrical grid for much of the country outside of PJM. PJM expects prices to continue to rise as the peak load forecast continues to increase due in large part to the growing demand of data centers that power the race to become the global leader in artificial intelligence. However, as indicated above, the next 2 auctions, that will cover Delivery Years 2026/2027 and 2027/2028, will be capped at $325/MW-day with a floor of $175/MW-day across the RTO, per FERC approval.

Ultimately, it is important to note that the District of Columbia imports over 95% of its energy from surrounding PJM states, as the District decided many years back to shutter all of its generation plants. It is crucial that the District continue to explore options for generating supply as well as strengthening its importing capabilities as it works to meet its carbon reduction goals. PJM will continue to serve as an educational resource and seeks to be a partner to the District of Columbia and in particular the Commission. PJM looks forward to continue working with the District to ensure its reliability needs are met.

Finally, as PJM does not engage in retail sales of electricity to end-use customers, it does not conduct independent outreach to DC retail customers.

C. Changes to Pepco's business strategy

Order No. 22334 directed the Task Force to report on any changes to Pepco's business strategy in "light of the capacity auction." The Task Force did discuss the issue and Pepco made an initial presentation on resource adequacy in response. The Task Force will continue to meet and develop the Phase 2 Report.[41]

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[41] Pursuant to Order No. 22425, ¶ 4, issued subsequently to Order No. 22334, the Commission also stated that the "Task Force shall then submit part two of the recommendation report on what improvements might be made locally to address the impacts of the capacity auction on District consumers by October 31, 2025. This two-part recommendation report will allow the Task Force to update the Commission on the

discussions held on these initial topics, while allowing the Task Force to continue to discuss ideas related to the long-term issues surrounding the capacity auction."

OPC PERFORMANCE OVERSIGHT HEARING

Response to Supplemental Question #9

PJM Report done by Synapse

ATTACHMENT 1

Attachment #1

OPC Performance Oversight Hearing

Response to Supplemental Question #9

PJM Report done by Synapse

Drivers of PJM's Capacity Market Price Surge and its Impacts on Electricity Consumers in the District of Columbia

Bill and Rate Impacts Associated with Recent and Upcoming Changes to PJM's Capacity Market

Prepared for the Office of the People's Counsel for the District of Columbia

April 25, 2024

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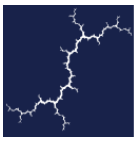

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EXECUTIVE SUMMARY

PJM Interconnection (PJM) is the regional transmission organization (RTO) that coordinates the movement of wholesale electricity across the District of Columbia (DC) and 13 states. Its capacity market auction procures power to ensure that electricity demand can be met on the hottest and coldest days of the year when demand is highest. PJM's most recent capacity market auction, its Base Residual Auction (BRA) that secured capacity for the 2025/2026 delivery year, resulted in the highest capacity prices ever seen in the region. System-wide prices rose from the 2024/2025 delivery year by a factor of nine, increasing from $28.92/MW-day to $269.92/MW-day. PJM-wide total capacity costs increased from $2.2 billion to $14.7 billion.[1] These auction results prompted PJM and stakeholders to reexamine the market dynamics that led to such high prices and explore various market reforms. The Office of People's Counsel (OPC) for DC commissioned Synapse Energy Economics (Synapse) to evaluate these market dynamics, assess market reforms, and quantify both recent and anticipated bill impacts for electricity customers in Washington, DC.

PJM's Pepco zone, where Washington, DC is located, saw a five-fold increase in capacity prices. Capacity clearing prices jumped for the sub-region from $49.49/MW-day in 2024/2025 to $269.92/MW-day for 2025/2026.[2] We estimate that starting in June 2025, the start of the 2025/2026 delivery year, the average residential electric customer will see a $10 increase in their monthly bill as a result of this latest capacity auction (holding all other bill changes constant), or a 9 percent increase (Table 1).

Table 1. DC bill and rate impacts of the 2025/2026 capacity auction results relative to the 2024/2025 delivery year

Rate Class	Monthly Bill Change (%)	Additional $/kWh Rate	Additional Cost on Month Bills ($)
Residential	9%	$0.017	$10
Commercial	9%	$0.016	$345

These unprecedented prices are primarily due to a few key factors—in a real sense, these factors represent a perfect storm of fundamental economic drivers causing prices to rise.

1) **Existing Supply Decreases**. PJM recently updated its resource accreditation methodology (which determines the capacity value of a resource, existing or new). It also entered into two new Reliability-Must-Run (RMR) arrangements and removed those units from the capacity market.

[1] 2025/2026 Base Residual Auction Report. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

[2] 2025/2026 Base Residual Auction Report. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

Added to this, older, uneconomic polluting fossil resources at the end of their life are also retiring. These three factors reduced total supply in the market, thereby increasing prices.

2) **New Supply Entry Barriers**. Meanwhile, the clogged PJM interconnection queue has prevented new, mostly cleaner resources from being able to enter the market in recent years. This is despite increasing prices and a clear market signal that more supply is needed.

3) **Dramatically Increasing Demand Projection**. Lastly, demand projections are also increasing across the PJM footprint, further exacerbating these issues and putting upward pressure on capacity prices.

PJM has already put several reforms in motion to change some of these market dynamics before its next auction (scheduled for July 2025). The Federal Energy Regulatory Commission (FERC) approved these reforms in February 2025. On the supply side, these reforms include removing exemptions where certain resources were not required to offer into the capacity market and changes that require RMR units to offer into the capacity market if they are providing capacity to the system. On the demand side, PJM will change certain parameters of its demand curve. More recently, PJM proposed a capacity price maximum and minimum, which was approved on April 21, 2025. These approved changes will apply to the 2026/2027 and 2027/2028 delivery years; PJM considers these changes to be stop-gap measures and will consider longer-term reforms for the 2028/2029 delivery year and beyond. Interconnection queue reform is also underway.

These reforms, along with planned retirements and updates to PJM's resource accreditation methodology (new ratings for effective load carrying capacity, or ELCC), could increase average monthly electric bills in DC by $1 for the 2026/2027 delivery year, incremental to the bill impact from the 2025/2026 auction results (Table 2). Synapse estimated the potential bill impacts of these reforms across four scenarios: (1) no new additional supply enters the market, (2) 2,000 MW of reliable (i.e., unforced) capacity enters the market, (3) 15,000 MW come online to enable the capacity price to fall to the proposed floor of $175/MW-day, and (4) 2,000 MW of capacity enters but there is no $325/MW-day price cap. Actual impacts will depend on a range of factors that remain in flux; these results demonstrate a potential range of impacts.

Table 2. DC bill impacts estimated for the 2026/2027 capacity auction relative to the 2025/2026 delivery year

	No Additional New Builds	Some New Entry	Price Floor	Some New Entry with No Price Cap
Residential Average Monthly Bill Change (relative to previous year)	+ $1	+ $1	- $5	+ $9
Commercial Average Monthly Bill Increase (relative to previous year)	+ $26	+ $26	- $172	+ $321

Source: Synapse analysis, see Section 4.

PJM must be able to bring new resources online to be able to (a) respond to high prices and market signals, (b) continue to meet growing levels of demand, and (c) enable states in PJM to meet their renewable energy and emissions targets. Although PJM began implementing interconnection reforms in 2024, many stakeholders have expressed concern that these reforms are insufficient. PJM has responded to these concerns with its Resource Reliability Initiative (RRI), another stop-gap measure, aimed at accelerating the interconnection of qualifying resources to bring more generation online before the 2029/2030 delivery year. Consumer advocates in the region called for reforms to prioritize ready-to-study projects sited in areas that are more likely to be constrained. However, RRI will prioritize larger capacity projects that can provide firm capacity and have high reliability ratings. Environmental groups are worried that RRI is unduly discriminatory against non-dispatchable resources in favor of gas, which has a high reliability rating, and there is additional concern that it may create challenges for PJM states and the District as they strive to meet renewable energy targets. Furthermore, the initiative does not guarantee that new resources will be online by the 2029/2030 delivery year.

Stakeholders will continue to have the opportunity to weigh in on these items and other market dynamics impacting future auctions, especially as many of these measures are intended to be temporary. This report assesses these market changes and their impacts on DC electricity customers to support DC OPC's navigation of these topics that are essential to managing the impact for DC residents and electricity consumers.

Joint Consumer Advocates' Response to PJM's Recent Base Residual Auction

In response to the BRA results for the 2025/2026 delivery year, the DC OPC along with state advocate offices from Maryland, New Jersey, Illinois, and Ohio (the "Joint Consumer Advocates" or "JCA") filed a complaint before FERC on November 18, 2024, requesting (1) a Rule 206 refund effective date be established; (2) a finding that PJM's existing capacity market rules are unjust and unreasonable, due to the failure to mitigate market power and excessive capacity charges; and (3) establishment of reasonable replacement rates based on recommended changes to the auction. These changes included:

1. Removing exemptions for resources to participate in the capacity auction, thus requiring the participation of intermittent resources, battery storage, demand response, and generation resources operating under RMR arrangements;
2. Reforming RMR resource treatment, including longer notice periods for generator deactivation and creating standardized provisions for RMR including a *pro forma* agreement delaying retirements as long as the resource is needed for reliability. Where continued service is required, compensation should be at the full cost of service and include a return on investment;
3. Using the winter ELCC ratings for gas-fired generators that seasonally match the winter risks for such resources when calculating their capacity values—thus allowing for more supply to be reflected in the auction;
4. Addressing the interconnection queues by prioritizing "ready-to-study" projects sited at Locational Deliverability Areas that are more likely to be constrained;
5. Requiring demand response resources to submit offers based on the maximum dispatchable demand reduction that the resource is making available to PJM and measure the actual reduction delivered (metered consumption before instruction less metered consumption after instruction) in response to a dispatch instruction during a system stress event; and
6. Imposing an offer cap on demand response resources when the structural market power tests fail.

The JCA also filed comments in support of Pennsylvania's challenge to PJM's use of Net CONE and later in opposition to the price cap and price floor proposed in the joint settlement filed by Pennsylvania and PJM of Pennsylvania's Complaint. With respect to Net CONE, in addition to supporting a multiplier of 1.5 times Net CONE as opposed to 1.75, the JCA advocated abandoning the use of the Reference Resource's Gross CONE to set the price cap. The JCA also recommended that PJM calculate Net CONE empirically, using an average of past auction clearing prices that have supported new entry. The JCA have argued that both the price floor and price cap are too high, though they acknowledge that the price floor could be reasonably accepted if proposed on its own. Since the cap and floor are not severable, both must be rejected. PJM's subsequent filings have adopted some of the recommendations initially proposed by the JCA.

1. BACKGROUND AND OVERVIEW

PJM Interconnection (PJM) is the regional transmission organization (RTO) that coordinates the movement of wholesale electricity across the District of Columbia (DC) and 13 states.[3] It manages competitive electricity markets, oversees long-term planning, and balances supply and demand to maintain a stable and reliable power system.

1.1. Capacity Market Basics

PJM's wholesale electricity marketplace consists of three important and distinct markets:

1. The **energy market** includes day-ahead and real-time auctions, responding to near-instantaneous fluctuations in supply and demand. It is designed to provide the lowest-cost electricity to consumers.

2. The **capacity market** ensures there is enough electricity supply to meet future demand by paying power plants and other resources to be available when needed in the future. The market selects the most cost-effective mix of resources, including thermal power plants, renewables and intermittent resources, grid-connected battery storage, and demand response programs.

3. The **ancillary services markets** help maintain grid reliability by providing essential services such as frequency regulation, operating reserves, and voltage control.

In the electricity market, **capacity** refers to the commitment of power resources—such as power plants, energy storage, and demand response programs—to be available when needed, particularly during peak demand periods and grid emergencies. Capacity represents the ability to supply electricity rather than the actual energy produced, to ensure grid reliability.

In PJM, the capacity market is called the Reliability Pricing Model (RPM), which is meant to cost-effectively procure enough power supply and demand response resources to meet future electricity demand, on the hottest and coldest days of the year. This procurement occurs through annual capacity auctions (the Base Residual Auction, or BRA, and subsequent incremental auctions),[4] which secure commitments from power generators and demand response resources to be available for one 12-month period. This 12-month period is referred to as the delivery year, from June through May. This auction

[3] In addition to the District of Columbia, PJM operates in Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, and West Virginia.

[4] PJM holds incremental auctions between BRAs. These supplemental auctions provide flexibility to account for changes in demand or supply conditions that may occur after the initial BRA.

traditionally occurs three years ahead of the delivery year, but PJM is currently off schedule and is conducting BRAs six to 12 months in advance of the start of the delivery year.

PJM's capacity market serves two primary purposes. First, it aims to send clear price signals to generator owners/developers and demand response program administrators. When the market is oversupplied, low-capacity prices can encourage costly and uneconomic resources to retire. Conversely, when there is a shortage in capacity, high-capacity prices incentivize the implementation of new generation. Second, it solves the "missing money" problem, whereby some resources may not make enough revenue in the energy market alone to remain online and provide a 12-month capacity commitment. The capacity market provides generators with an additional revenue stream (typically more stable than the price-volatile energy markets) to recover their capital investments and fixed costs.

1.2. Supply and Demand Curves

PJM's capacity market balances supply and demand to set a cost-effective market clearing price in each of numerous Locational Deliverability Areas (LDA), with clearing prices remaining the same across LDAs if transmission constraints between regions are not binding. When such constraints bind, a 'congested' region will have a higher clearing price than its uncongested neighboring region.

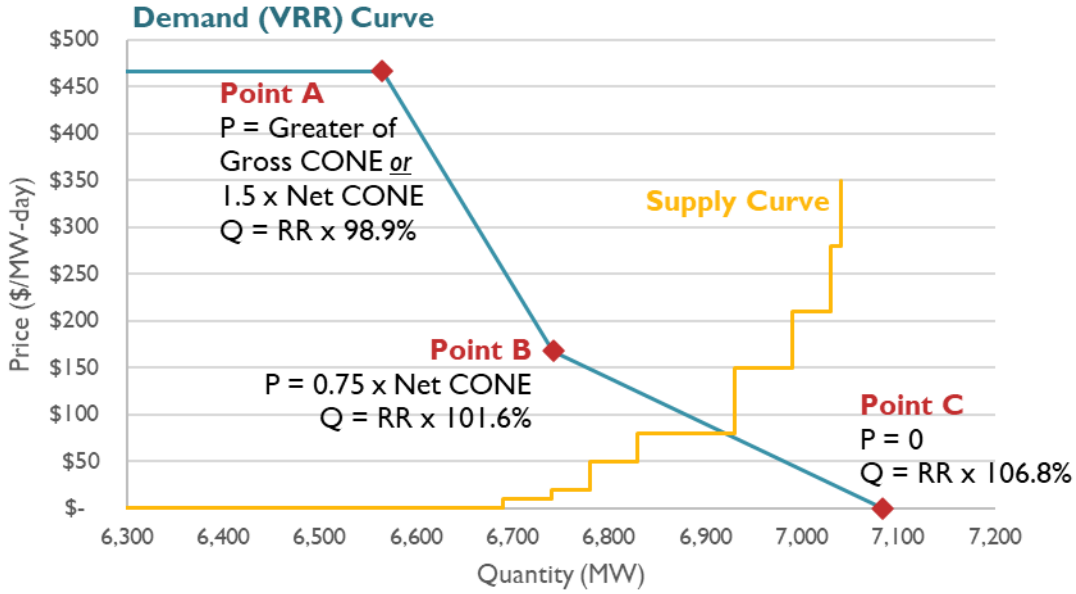
1. **Supply Curve (Seller Bids)** – Capacity suppliers (power plants, demand response resources, etc.) submit bids with the quantity and price at which they are willing to provide capacity. The seller bids are stacked from lowest to highest price, to create an upward sloping curve.

2. **Demand Curve (Variable Resource Requirement Curve)** – PJM sets a demand curve which reflects how much capacity is needed to ensure grid reliability. The demand curve is a downward sloping 3-point "curve" called the variable resource requirement (VRR) curve and reflects aggregate consumers' willingness to buy slightly more reliability if supply costs are low enough.

3. **Market Clearing Price** – The auction clears where the supply curve intersects the demand curve. This means PJM selects the lowest-cost resources first, moving up the supply curve, until the capacity requirement is met. The highest-priced accepted bid sets the uniform **clearing price**, which is paid to all cleared capacity resources.

Resources with a capacity commitment have "cleared" in the capacity auction in a respective LDA and are subsequently paid the market clearing price ($/MW-day) for that delivery year for the LDA. Figure 1 shows the VRR curve, supply curve, and clearing price dynamics (the supply curve is illustrative, and the clearing price is thus an example). We discuss each of these three components in more detail below.

Figure 1. The 2025/2026 VRR Curve for the Pepco LDA, where P is price ($/MW-day), Q is quantity (MW), and RR is reliability requirement, alongside an illustrative example supply curve (which does not reflect 2025/2026 supply offers and the resulting clearing price)



Source: VRR curve for Pepco LDA, 2025/2026 Planning Period Parameters for Base Residual Auction, April 12, 2024. Figure originally developed by Synapse for the Bill and Rate Impacts of PJM's 2025/2026 Capacity Market Results & Reliability Must-Run Units in Maryland, August 2024, Maryland Office of People's Counsel, Available at: https://opc.maryland.gov/Portals/0/Files/Publications/RMR%20Bill%20and%20Rates%20Impact%20Report_2024-08-14%20Final.pdf?ver=V9hZfyTmjLeNVt2Dg3cTgw%3D%3D.

Supply Curve: Offer Prices and UCAP Quantity

Generators and demand response resources submit offers that reflect their megawatt (MW) value and price. The MW quantity in a resource's offer is defined by how much capacity it can provide at peak periods and grid emergencies, to contribute to the system's reliability (referred to as its unforced capacity (UCAP)). A resource's UCAP is less than its nameplate or "installed" capacity (ICAP).

An existing resource offers its UCAP value at a price equal or less than the costs it would avoid by not operating for the delivery year, as defined by the Market Seller Offer Cap (MSOC) rules. New market participants can enter at a price of zero (price takers) or at prices that reflect their net costs of entering.

VRR Curve: Reliability Requirements and Net CONE

PJM has an RTO-wide VRR curve, while LDAs that are transmission or capacity constrained have LDA-specific VRR curves. Each point on the VRR curve is defined by the reliability requirement (based on peak load) and Net Cost of New Entry (CONE). For instance, in the 2025/2026 BRA, Point A on the VRR Curve was 98.8 percent times the reliability requirements (quantity (MW), on the x axis) and either the greater of 1.5 x Net CONE or Gross CONE (price, on the y axis) (as shown in Figure 1). These three points, defined by the reliability requirement and Net CONE, create a three-point downward-sloping curve.

The reliability requirement is the target level of capacity required to meet PJM's reliability standards. This is expressed as forecasted peak load plus a reserve margin and is meant to reflect the amount of capacity necessary to meet the reliability criteria of a loss of load expectation (LOLE) of one day in 10 years for the RTO as a whole (or one day in 25 years for individual LDAs). PJM determines this reliability requirement through probabilistic risk modeling, which incorporates load forecasts, outage rates, and the availability of different resource types.

CONE is the average revenue that a newly built resource—specifically a reference resource selected by PJM—would need to earn in the capacity market within its first year of operation.[5] PJM currently uses a simple-cycle combustion turbine (CT) as the reference resource to calculate CONE.[6] Net CONE is calculated by subtracting the reference resource's expected revenues in the energy and ancillary services (E&AS) markets from the total gross CONE value. Net CONE changes from year to year, based on estimates of capital costs, ongoing operating and maintenance expenses, and expected E&AS offsets for the reference technology. PJM publishes the reliability requirement, Net CONE, and VRR curve for the RTO and each constrained LDA in its Planning Period Parameters no more than 100 days before the auction.

LDAs and Price Separation

In PJM's capacity market, LDAs are geographic subregions used to model transmission constraints and reliability needs. These LDAs can be nested within larger LDAs, creating a hierarchy (e.g., Baltimore Gas and Electric, or BGE, and Pepco are both nested within SWMAAC, which is nested within MAAC, which is in turn is nested within the RTO). This nesting hierarchy is referred to as child and parent (e.g., SWMAAC is the child of MAAC). During the capacity auction, each LDA clears sequentially, starting with the smallest/narrowest areas. If a specific LDA has limited import capability, it may need more local (and higher priced) capacity, leading to a higher clearing price compared to its parent LDA, referred to as price separation. The nesting allows PJM to reflect transmission limitations and localized scarcity more accurately. A constrained nested LDA (such as BGE within SWMAAC) may clear at a significantly higher price than the broader area if local capacity is scarce, signaling the need for more local investment or upgrades to transmission infrastructure.

DC is located within the Pepco LDA, which is nested within SWMAAC LDA (along with BGE LDA). Pepco has not experienced price separation in recent years.

[5] Newell, S., Hagerty, J.M., Pfeifenberger, J., Zhou, B., Carless, T., Janakiraman, R., Gang, S., Daou, P., Junge, J. April 21, 2022. PJM CONE 2026/2027 Report. Prepared for PJM Interconnection. Available at: https://www.pjm.com/-/media/DotCom/library/reports-notices/special-reports/2022/20220422-brattle-final-cone-report.ashx.

[6] Ibid.

2. THE 2025/2026 BRA RESULTS AND ITS IMPACT ON DC ELECTRICITY CUSTOMERS

2.1. Auction Results

In the latest BRA, which occurred in July 2024 for the delivery year 2025/2026, capacity auction clearing prices reached unprecedented levels. System-wide prices increased by a factor of nine, increasing from $28.92/MW-day to $269.92/MW-day.[7] This resulted in total PJM-wide capacity costs of $14.7 billion for 2025/2026, over $12 billion more than the previous year.[8] Prices in the BGE and Dominion (DOM) LDAs were even higher, clearing at the maximum allowable price. The Pepco LDA, where DC is located, saw a five-fold increase in capacity prices. It cleared with its parent LDAs SWMAAC and MAAC at $49.49/MW-day in 2024/2025 and cleared with the RTO as a whole in 2025/2026 at $269.92/MW-day.[9] Table 3 outlines the capacity clearing prices for the 2025/2026 and 2024/2025 delivery years for a subset of LDAs, including the Pepco LDA.

Table 3. BRA clearing pricing for 2024/2025 and 2025/2026 delivery years, for a selection of LDAs

LDA	2024/2025 Clearing Price ($/MW-day)	2025/2026 Clearing Price ($/MW-day)
RTO	$28.92	$269.92
MAAC	$49.49	$269.92
EMAAC	$54.95	$269.92
SWMAAC	$49.49	$269.92
PEPCO	**$49.49**	**$269.92**
BGE	$73.00	$466.35
DOM	$28.92	$444.26

Source: PJM's RPM Base Residual Auction Results for 2024/2025 and 2025/2026, available at: https://www.pjm.com/markets-and-operations/rpm.

2.2. Bill and Rate Impact for DC Electricity Customers

We calculate that the 2025/2026 capacity auction market results will increase the average residential customer's energy bill in DC by approximately $10/month relative to the 2024/2025 delivery year,

[7] 2025/2026 Base Residual Auction Report. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

[8] 2025/2026 Base Residual Auction Report. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

[9] 2025/2026 Base Residual Auction Report. July 30, 2024. PJM Interconnection, LLC. https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

holding all other bill changes constant (Table 4). The additional $10 per month will likely be felt by residential customers starting in June 2025 through May 2026, the length of the delivery year.

Table 4. DC bill and rate impacts of the 2025/2026 capacity auction results relative to the 2024/2025 delivery year

Rate Class	Monthly Bill Change (%)	Additional $/kWh Rate	Additional Cost on Month Bills ($)
Residential	9%	$0.017	$10
Commercial	9%	$0.016	$345

Source: see description in text.

Synapse calculated the average bill increase by first determining the incremental cost to electricity customers in the Pepco LDA between the 2024/2025 and 2025/2026 delivery years, using auction result data from PJM.[10] The Pepco LDA covers DC and portions of Maryland. Using data from the U.S. Energy Information Administration's (EIA) Form EIA-861,[11] we first allocated the incremental cost to electricity customers to the DC portion of the Pepco LDA. Based on EIA data, the DC portion of the Pepco LDA is responsible for 38 percent of total electricity consumption in the LDA. We therefore assume that the DC portion of the Pepco LDA is also responsible for 38 percent of the LDA's capacity market costs. We then allocated the DC portion of the Pepco LDA capacity costs to either residential or commercial customers, using EIA data on electricity consumption.[12] We exclude any other bill changes for electricity customers that may be in effect during this period, such as distribution and delivery costs, transmission costs, energy costs, or others.

Capacity procurement schedules (both for Pepco's standard offer service and for third-party suppliers) may occur on slightly different schedules than PJM's auction timing. Capacity procurement schedules may affect the estimated timing of the expected bill impacts; our estimated $10/month increase for residential customers is the annual expected average over 12 months.

2.3. Driving Factors Behind the Capacity Market Price Increase

There are four key factors that help explain the soaring prices, which have led to concerns about the region's ability to effectively and affordably meet demand:

1. Changes to capacity market rules, in particular how capacity is valued in the market

[10] PJM, Base Residual Auction Results and Third Incremental Auction Results for Delivery Years 2024/2025 and 2025/2026, available at: https://www.pjm.com/markets-and-operations/rpm

[11] United States Energy Information Administration, Annual Electric Power Industry Report Form EIA-861, https://www.eia.gov/electricity/data/eia861/

[12] Ibid.

2. Generator retirements and the impact of how PJM treats reliability-must-run (RMR) units in the capacity market
3. Interconnection queue backlogs
4. Increases in demand as a result of electrification and data center growth

The first two drivers, recent market reforms and PJM's treatment of RMR units in the capacity market, reduced supply in the market. As with any market, all else equal, a reduction in supply typically increases prices. The reduction in supply was further compounded by the third driver, the clogged PJM interconnection queue. This has meant that few new resources have been able to enter the market in recent years, despite the increasing prices that sent a clear market signal that more supply is needed. Lastly, demand is also increasing across the PJM footprint, further exacerbating these issues and putting upward pressure on capacity prices. Concerningly, PJM expects these dynamics to continue for the foreseeable future, which could lead to increasingly unaffordable electricity prices across the region.[13] We discuss each of these factors in greater detail below.

Changes to PJM's Capacity Accreditation

Capacity markets are designed to ensure that the electrical grid has sufficient generating resources to meet current and future electricity demand. Generators and demand response resources with a capacity commitment are paid the market clearing price times the amount of capacity value they are providing to the market. The process of measuring and valuing a resource's capacity value is called capacity accreditation (i.e., determination of its unforced capacity (UCAP)).

Following winter storm Elliot in 2022, the region saw major outages and reliability shortfalls. In response, PJM implemented various capacity market reforms for the 2025/2026 delivery year, most notably its capacity accreditation methodology. Previously, PJM used various methods to determine a generator's accredited value (or UCAP). However, starting with the 2025/2026 delivery year, PJM adopted a Marginal Effective Load Carrying Capability (ELCC) approach.[14] This approach accredits resources based on their marginal contribution to the system's reliability needs, modeling all 8,760 hours in a year across multiple scenarios.[15]

This new ELCC approach has resulted in a reduced UCAP value for most resource types, reducing the total firm supply of capacity participating in the market. As seen in Table 5, solar and natural gas resources experienced the most significant change in their ELCC values, decreasing by an average of 29 and 22 percent, respectively, between the 2024/2025 and 2025/2026 delivery years.

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[13] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, at page 5.

[14] PJM previously used a few capacity accreditation methods for different resource types (e.g., thermal versus intermittent resources). Federal Energy Regulatory Commission, January 30, 2024. Order Accepting Tariff Revisions Subject to Condition. Docket ER24-98, at 3-5.

[15] PJM's ELCC approach explicitly models how generator forced outages and other de-rates vary with temperature.

Table 5. PJM's average capacity class ratings for the 2024/2025, 2025/2026, and 2026/2027 delivery years

Resource Type	2024/2025	2025/2026	2026/2027
	Historical Method	Marginal ELCC Method	
Fixed-Tilt Solar	30%	9%	8%
Tracking solar	50%	14%	11%
Coal	87%	85%	83%
Gas Combined Cycle	96%	80%	74%
Gas Combustion Turbine	90%	62%	60%
Diesel (Oil)	91%	90%	91%

Source: Class ratings for 2025/2026 using historical capacity accreditation method from: PJM Interconnection, December 1, 2023. Docket ER24-99-001. Responses to Deficiency Letter – Capacity Market Reforms to Accommodate the Energy Transition, at 27. Updated 2025/2026 Class Ratings from: PJM Interconnection, ELCC Class Ratings for the 2025/2026 Base Residual Auction, March 13, 2024, available at: https://www2.pjm.com/-/media/planning/res-adeq/elcc/2025-26-bra-elcc-class-ratings.ashx. ELCC Class Ratings for the upcoming 2026/2027 delivery year from: PJM Interconnection, ELCC Class Ratings for the 2026/2027 Base Residual Auction, February 28, 2025, available at: https://www.pjm.com/-/media/DotCom/planning/res-adeq/elcc/2026-27-bra-elcc-class-ratings.pdf.

The derating of gas and renewable resources between delivery years 2025/2025 and 2025/2026 resulted in a substantial decrease in the UCAP offered into the market. It also meant that affected resources had to increase their offer prices. As a resource's effective capacity (UCAP) is reduced—meaning it can sell fewer megawatts—it must raise its prices to ensure it can still cover its annual costs and remain financially viable. For instance, consider an 8 MW UCAP resource that previously bid in at $50/MW-day, reflecting costs of $400/day; if now accredited at 5 MW UCAP, the offer would be adjusted to $80/MW-day resulting in the same total $400/day amount.[16] This dynamic creates a scenario in which consumers have to pay more for less capacity. PJM's adoption of the new ELCC approach caused auction revenues to increase by an estimated 49.1 percent, or $4.4 billion, between the 2024/2025 and 2025/2026 delivery years.[17]

Retirements and Reliability-Must-Run Units

In recent years, many aging coal power plants and other fossil fuel generators have economically retired across the PJM region, reducing the amount of conventional, higher-emission supply available to the capacity market. Between the 2024/2025 and 2025/2026 BRAs, 3,640 MW of nameplate capacity retired

[16] PJM Market Implementation Committee. January 10, 2024. Informational Posting: Simulation Analysis of PJM CIFP-RA Filing. Available at: https://www.pjm.com/-/media/committees-groups/committees/mic/2024/20240110/20240110-informational-only---simulation-analysis-of-pjm-cifp-ra-filing.ashx.

[17] Compared to what RPM revenues would have been had PJM cleared the auction without locational constraints and using the prior, EFORd approach. Monitoring Analytics, Analysis of the 2025/2026 RPM Base Residual Auction Part A. Available at: https://www.monitoringanalytics.com/reports/Reports/2024/IMM_Analysis_of_the_20252026_RPM_Base_Residual_Auction_Part_A_20240920.pdf.

across the PJM footprint.[18] We estimate this to be roughly 3,300 MW of accredited capacity (UCAP),[19] or approximately 2 percent of the capacity that cleared in the 2024/2025 auction.

The reduction in supply has been further compounded by two recent RMR agreements. In 2023, Talen Energy announced its intent to retire Brandon Shores and Herbert A. Wagner (Wagner) generators. The units are located in the BGE LDA, which is highly transmission constrained. PJM determined that if Brandon Shores units 1 and 2, and Wagner units 3 and 4 were to retire, there could be major grid reliability issues. PJM asked Talen to continue operating these four units beyond their proposed retirement date of June 2025, through RMR arrangements, until the associated reliability issues can be addressed with upgrades to the transmission system. These upgrades would alleviate the reliability concerns by enabling electricity to be imported from neighboring areas. The RMR service[20] is a specific designation applied to generating units that agree to remain operational beyond their planned retirement dates, until transmission solutions are put in place that address the reliability issue. PJM entered into two RMR arrangements with Talen Energy for its Brandon Shores and Wagner generators starting in June 2025, [21] which are expected to extend to May 31, 2029.[22]

Importantly, although PJM needs RMR units to continue operating to avoid reliability issues (e.g., to generate energy during critical periods), these units have not participated as supply-side resources in any previous PJM capacity auction.[23] This means that when a unit enters into an RMR arrangement with PJM, the LDA where it is located will see a sudden drop in capacity market supply (despite having the same amount of grid-connected resources in that LDA). For instance, in the latest BRA, the removal of Brandon Shores and Wagner dramatically reduced supply for the BGE LDA. That meant that only 10 percent of the LDA's capacity was located within the LDA, while the remaining amount was imported from neighboring regions. However, since the LDA was so transmission-constrained, it could not import enough capacity to meet its reliability requirements (the target amount of capacity required to meet PJM's reliability standard). As a result of the sudden drop in supply, the transmission-constrained zone cleared at the maximum allowable capacity price in the 2025/2026 BRA. This capacity shortfall in the BGE LDA, as a result of the RMRs not participating in the capacity auction, had a spillover effect into the

[18] PJM Interconnection, LLC. PJM - Generation Deactivations. Available at: https://www.pjm.com/planning/service-requests/gen-deactivations.

[19] Using average class ratings for the 2024/2025 delivery year.

[20] RMRs are referred to as "Part V Reliability Service" in the PJM tariff.

[21] In 2024, PJM arranged to retain one resource under RMR contracts: the Indian River plant ("IR4"), a 410 MW coal facility owned by NRG Power Marketing, located in Delaware in the DPL South LDA. The Indian River RMR arrangement terminated in February 2025, approximately 22 months ahead of schedule. PJM Inside Lines. December 23, 2024. "Delaware Generator To Retire Ahead of Schedule." Available at: https://insidelines.pjm.com/delaware-generator-to-retire-ahead-of-schedule/.

[22] Talen Energy, January 27, 2025. "Talen Energy, Other Parties Reach Reliability Must Run Settlement Agreement for Brandon Shores and H.A. Wagner Power Plants." Available at: https://ir.talenenergy.com/news-releases/news-release-details/talen-energy-other-parties-reach-reliability-must-run-settlement.

[23] PJM Interconnection, LLC. 2024. "PJM Response to Independent Market Monitor Report on 2025/2026 Base Residual Auction." Available at: https://www.pjm.com/-/media/DotCom/library/reports-notices/reliability-pricing-model/20241011-response-to-imm-25-26-bra-report.ashx.

RTO as a whole. It increased the RTO-wide clearing prices and pushed up consumer prices in the Pepco zone and beyond, resulting in a 41.2 percent increase in overall auction revenues, or an increase of $4.3 billion.[24]

Electricity customers compensate units retained through RMR arrangements for their continued operation through out-of-market payments administered by PJM. These payments are in addition to the capacity price spike associated with their removal from the capacity auction, as described above. RMR costs are allocated to LDAs proportionally to the cost allocation of the transmission upgrades that will address the reliability issues that necessitated the RMRs to begin with. Table 6 shows the total out-of-market costs of Brandon Shores and Wagner RMRs, and the bill impact of these procurements on DC Pepco customers. The Pepco LDA is responsible for 11 percent of total RMR costs, the second largest share after the BGE LDA. The DC portion of Pepco is responsible for roughly 4 percent of total annual RMR costs, with the Maryland portion paying for the remaining 7 percent.

Table 6. Initial RMR costs for Brandon Shores and Wagner RMR arrangements, and the costs allocated to DC Pepco electricity customers

Generator	Nameplate MW	Annual RMR Costs	Percent of Costs Allocated to DC Pepco Customers	Annual RMR Costs Allocated to DC Pepco Customers	Additional cost on the average residential monthly electric bill
Brandon Shores (units 1&2)	1,282	$145.9 million	4 percent	$5.9 million	-
Wagner (units 3&4)	703	$35.2 million		$1.4 million	-
Combined Total	**1,985**	**$181.1 million**		**$7.3 million**	**$0.50 per month**

Notes: Brandon Shores and Wagner RMR cost recovery is subject to litigation by intervening stakeholders in a proceeding before FERC. As a result, the final cost recovery amount approved by FERC may be lower than the initial proposal. Cost data Talen Energy, January 27, 2025. "Talen Energy, Other Parties Reach Reliability Must Run Settlement Agreement for Brandon Shores and H.A. Wagner Power Plants", Available at: https://ir.talenenergy.com/news-releases/news-release-details/talen-energy-other-parties-reach-reliability-must-run-settlement

Brandon Shores and Wagner units are scheduled for use as RMR units through May 2029,[25] when the transmission enhancements are complete that will address the reliability issues associated with these

[24] Holding everything else constant, the fact that the RMR resources in the BGE LDA were not included in the supply curve at $0 per MW-day resulted in a 41.2 percent increase in RPM revenues, $4,287,256,309, for the 2025/2026 RPM Base Residual Auction compared to what RPM revenues would have been had the capacity of those RMR resources been included in the supply curve at $0 per MW-day. Monitoring Analytics, Analysis of the 2025/2026 RPM Base Residual Auction Part A. Available at: https://www.monitoringanalytics.com/reports/Reports/2024/IMM_Analysis_of_the_20252026_RPM_Base_Residual_Auction_Part_A_20240920.pdf.

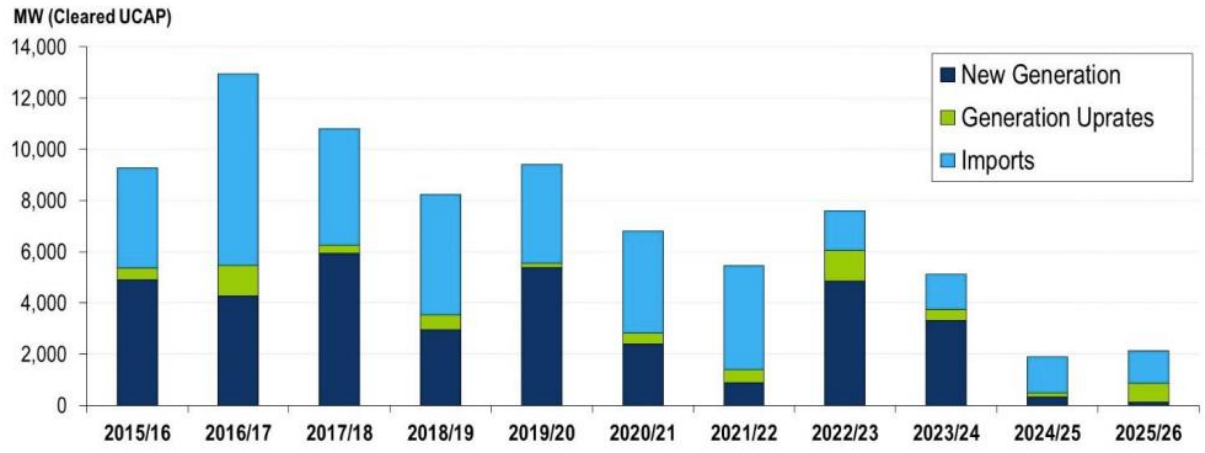
[25] According to the latest settlement agreement, Talen Energy, January 27, 2025. "Talen Energy, Other Parties Reach Reliability Must Run Settlement Agreement for Brandon Shores and H.A. Wagner Power Plants." Available at:

unit retirements. However, there are multiple factors that could delay the construction and completion of the required transmission projects, making this timeline uncertain.

PJM Interconnection Queue Constraints

Capacity supply across the region has decreased in recent years, as result of PJM's new capacity accreditation methodology and PJM's historical treatment of RMRs in the auction. This led to historically high capacity market prices in the last BRA. High market prices should incentivize new market entry to ultimately bring prices down. However, the PJM interconnection queue is currently experiencing major delays and constraints, meaning that it has been increasingly difficult for new generation to enter PJM's capacity markets in recent years. This is evident in Figure 2, which shows that the volume of new supply resources clearing in the capacity market has been substantially lower in the last two auctions (2024/2025 and 2025/2026) relative to previous delivery years. New supply is not able to replace the retiring resources and the reductions in supply associated with the new capacity accreditation methodology. The impact of delayed new resource entry has been compounded by the truncated periods between the most recent auctions and the start of delivery years, which further reduces the ability of capacity prices to incentivize new entry.[26] Ultimately, because of the clogged queue and shortened auction schedule, generator owners and developers are not able to respond to the capacity market's price signal with new entry as quickly as needed, thus reducing the market's efficiency and effectiveness.

Figure 2. Cleared MWs (UCAP) of new generation, upgrades, imports by delivery year (excludes existing generation)



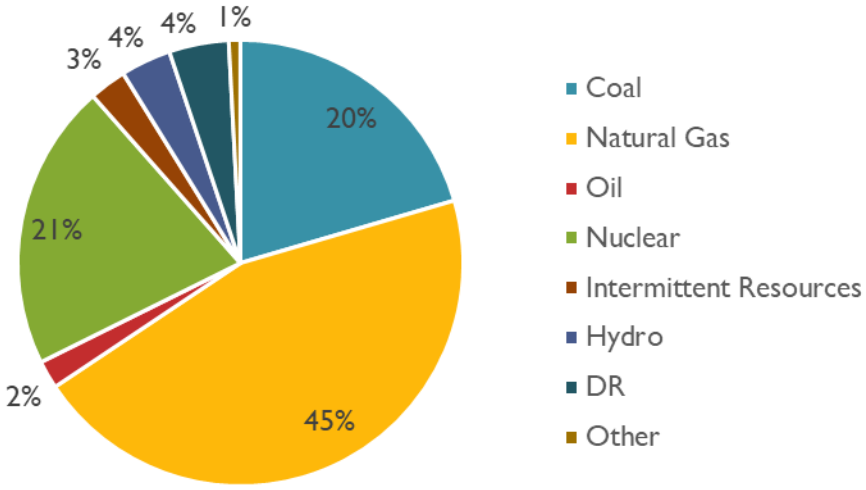
Source: 2025/2026 Base Residual Auction Report. July 30, 2024. PJM. Available at: https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

https://ir.talenenergy.com/news-releases/news-release-details/talen-energy-other-parties-reach-reliability-must-run-settlement.

[26] Complaint of Joint Consumer Advocates. FERC EL25-18, page 3.

In the latest auction, natural gas represented the largest share of cleared resources (UCAP), representing 45 percent, followed by nuclear and coal (21 percent each) (Figure 3). Conversely, the interconnection queue is made up of 94 percent renewables and storage, and only 6 percent gas-fired resources, on a MW basis.[27]

Figure 3. Cleared resources by type, in UCAP MW, in the latest 2025-2026 BRA



Notes: Other includes "Aggregate Resources" and "Other" (as defined by PJM), Oil includes "Oil" and "Distillate Oil (No.2)", and Intermittent Resources include Solar, Wind, and Battery/Hybrid. 2025/2026 Base Residual Auction Report. July 30, 2024. PJM. Available at: https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-base-residual-auction-report.pdf.

Increasing Load and Demand

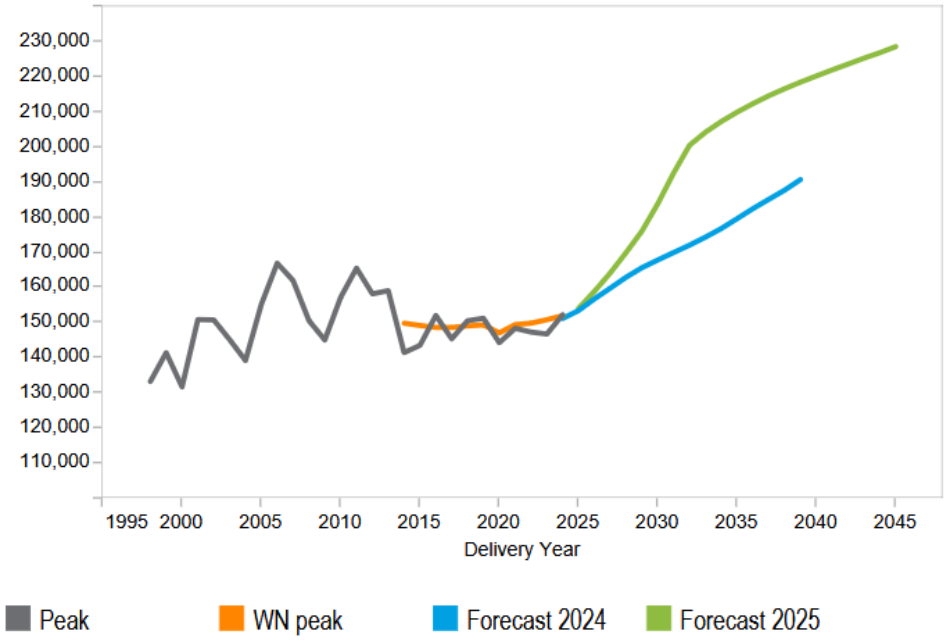
Alongside PJM's new capacity accreditation, recent retirements, new RMR agreements, and clogged queue, increasing demand is also contributing to rising capacity costs. Total load across the PJM footprint increased by 3,243 MW (or 2 percent) between the 2024/2025 and 2025/2026 delivery years, representing a substantial increase relative to historical changes to demand. A similar increase is expected for the next delivery year, followed by rapid escalation beyond 2026 (Figure 4).[28] Much of this is due to projected demand from new data centers, as well as growing electrification of buildings and

[27] Energy Transition in PJM: Resource Retirements, Replacements & Risks, PJM Interconnection, L.L.C., 2 (Feb. https://www.pjm.com/-/media/library/reports-notices/special-reports/2023/energytransition-in-pjm-resource-retirements-replacements-and-risks.ashx ("Four Rs Report").

[28] 2025 Preliminary PJM Load Forecast, Load Analysis Subcommittee. December 9, 2024. Available at: https://www.pjm.com/-/media/DotCom/committees-groups/subcommittees/las/2024/20241209/20241209-item-03---2025-preliminary-pjm-load-forecast.ashx

transportation (e.g., heat pumps and EVs). The increasing load forecasts further exacerbate these market dynamics and the tightening balance of supply and demand in PJM, and thus drives up prices.

Figure 4. PJM's summer peak forecast (MW) for the RTO



Source: 2025 PJM Long-Term Load Forecast Report. January 24, 2025. PJM. Available at: https://www.pjm.com/-/media/DotCom/library/reports-notices/load-forecast/2025-load-report.pdf.

3. UPCOMING CHANGES TO THE 2026/2027 AND 2027/2028 CAPACITY MARKETS

Given the very high clearing prices in the 2025/2026 delivery year, and the strong likelihood that these recent market dynamics will continue for the foreseeable future, there have been widespread calls for capacity market reform in PJM.[29] As a result, PJM recently reexamined several of its capacity market rules and proposed "stop gap" measures for the 2026/2027 and 2027/2028 delivery years. In February 2025, FERC approved these reforms, which will affect how PJM treats RMRs in the capacity market, what resources must offer into the capacity market, and the selection of the reference resource used for Net CONE calculations and the VRR Curve. On April 21, 2025, FERC also approved PJM and Pennsylvania's proposal to set a new price maximum and minimum. These approved reforms will affect how much

[29] Several entities filed a complaint in Docket No. El24-148.

supply will participate in the auction, as well as how the VRR demand curve is defined. This section discusses these reforms.

Separately, PJM plans to continue to evaluate and develop its rules around RMR treatment before the 2028/2029 BRA; and later in 2026, PJM will review the reference technology and other parameters that influence the VRR curve. Section 6 (Ongoing Reform Discussions) summarizes these longer-term reforms.

3.1. Upcoming Changes to Supply

Ending the Must-Offer Exemption for Intermittent, Storage, and Hybrid Resources

Since 2015, all existing generation capacity resources with capacity interconnection rights (CIR) have been required to submit a supply offer into the BRA, except for intermittent resources, storage, hybrid, and demand response resources. However, FERC recently ended the must-offer exemption for intermittent, storage, and hybrid resources, effective for the upcoming 2026/2027 delivery year. This change will increase the total amount of available supply. Only demand response resources will remain categorically exempt.

This change was proposed by PJM and supported by various stakeholders. As PJM explains, the resource mix in PJM has changed substantially over the last decade. The amount of UCAP supplied by intermittent, storage, and hybrid resources has tripled since 2018/2019 alone, and these resource types now make up 97 percent of the planned MW in the PJM interconnection queue (substantially more than in 2015).[30] PJM and the market monitor also argue that the must-offer exemption could lead to market power issues, especially as the share of solar, wind, and storage resources continues to grow in the future.[31] The Joint Consumer Advocates in PJM (the District of Columbia, Maryland, Ohio, New Jersey, and Illinois) also supported lifting the must-offer exemption for demand response resources, citing market power issues.[32] Lastly, the market monitor argued that the exemption for resources with CIRs tie up CIRs that could be allocated to other resources.[33]

However, some intervenors opposed the change. For instance, certain parties argued that if intermittent resources are forced to participate in the capacity market, they could face an elevated risk of high non-performance charges as they may not always be able perform reliably in emergency conditions (e.g., solar cannot perform at night). They argued that this could discourage investment in future intermittent resources across PJM.[34] However, FERC dismisses this concern with the explanation that the ELCC

[30] Order Accepting Tariff Revisions. FERC ER25-785-000. February 20, 2025, page 5.

[31] Order Accepting Tariff Revisions. FERC ER25-785-000. February 20, 2025, page 23.

[32] Complaint of Joint Consumer Advocates. FERC EL25-18, page 5.

[33] Order Accepting Tariff Revisions. FERC ER25-785-000. February 20, 2025, page 22.

[34] Order Accepting Tariff Revisions. FERC ER25-785-000. February 20, 2025, page 26.

accreditation methodology objectively accounts for each capacity resource's expected availability during grid emergencies (e.g., solar has lower ELCC ratings to account for its inability to perform at night).[35]

We estimate that lifting the exemption for intermittent and storage resources will increase supply in the upcoming BRA by an estimated 2,000 (UCAP).[36] This is in addition to the 3,969 MW UCAP of solar, wind, and battery resources offered into the market in the 2025/2026 BRA (3,027 MW of which cleared).

RMR Participation in the Capacity Market

The capacity market clearing price should reflect the actual level of supply in the market. However, as discussed above, RMRs have been removed from the capacity supply curve and do not participate in the auction. This reduces apparent supply, often resulting in artificially high clearing prices. This occurred in the BGE LDA, where capacity prices cleared at the maximum. Astoundingly, Brandon Shores and Wagner's removal from capacity market participation had a spillover effect into the rest of the RTO, costing PJM customers as a whole an additional $4.3 billion in the 2025/2026 delivery year,[37] in addition to the annual $181 million that the local LDA customers are paying for the out-of-market RMR arrangement.

PJM's historical treatment of RMRs in the market leads to customers paying twice for the same capacity: (1) for the out-of-market RMR arrangement costs and (2) in the capacity market to procure the capacity that is already provided by the RMR resource.[38] In their November 2025 filing arguing that PJM's current BRA construct is unjust and unreasonable, a group of consumer advocates within the PJM region (including the DC OPC) requested that FERC require PJM to compensate RMR resources at a full cost-of-service rate in exchange for their full participation in PJM's capacity, energy, and ancillary service markets where they are eligible.[39] This would include requiring them to function as price takers in BRAs, which would increase the capacity market supply and prevent double-payment by consumers. PJM's accepted reforms partly accomplish this.

PJM now agrees that RMRs should participate in the PJM auction to reflect more accurate price signals and prevent electricity customers from paying twice for capacity. FERC approved PJM's proposal to

[35] Order Accepting Tariff Revisions. FERC ER25-785-000. February 20, 2025, page 26.

[36] We estimate that there is an additional 2,000 MW (UCAP) of solar, wind, and battery/hybrid resources that are not participating in the market. We estimate this by reviewing the capacity (nameplate MW) of all existing resources in PJM (from U.S. EIA form 923 and 860), applying ELCC ratings to estimate the total UCAP by resource type, and comparing that value against the offered and cleared amount of capacity in the 2025/2026 BRA.

[37] Monitoring Analytics, *IMM Analysis of the 2025/2026 RPM Base Residual Auction – Part A*, September 20, 2024, https://www.monitoringanalytics.com/reports/Reports/2024/IMM_Analysis_of_the_20252026_RPM_Base_Residual_Auction_Part_A_20240920.pdf.

[38] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 30.

[39] Complaint of Joint Consumer Advocates. FERC EL25-18, page 5.

allow Brandon Shores and Wagner to provide capacity, as long as they meet the four criteria developed by PJM.

Four Criteria for RMR Participation in the Capacity Market

Starting in the upcoming 2026/2027 auction (currently scheduled for July 2025), RMR units will participate in the capacity market as supply-side resources if they meet four criteria:

1. The RMR resource must have sufficient CIRs. In other words, the transmission system must be able to accommodate the injection of the resource's energy.
2. The RMR resource must have an RMR agreement that has been accepted by FERC at least three months before the planning parameters are published, ensuring that PJM can properly incorporate the resource into its planning.[40,41]
3. The RMR resource must be reasonably expected to be able to operate for the entire delivery year. It must have all the necessary permits to operate, and no conditions or contractual commitments that would unduly prevent it from operating.
4. The RMR arrangement terms must not preclude PJM dispatching the RMR unit for such emergencies (each RMR agreement is negotiated between PJM and the resource owner, and the terms can vary).[42]

The four criteria are designed to provide assurance that the resource is physically and contractually capable of performing during grid emergencies and therefore can and should be considered a capacity resource. As PJM argues, if an RMR resource is not able to meet all four criteria, then the unit cannot reasonably provide capacity to the system, and consumers would therefore not be double-paying for capacity.[43] If a resource does meet all four criteria, then PJM can rely on the resource to contribute to the region's resource adequacy.

Brandon Shores and Wagner Expected Future Participation in the Capacity Market

Brandon Shores units 1 and 2, and Wagner units 3 and 4 are expected to meet all four criteria above and provide supply in the 2026/2027 and 2027/2028 delivery years (until transmission solutions are put in place to address the related reliability issues). No other units are expected to be needed for RMR service for the next two delivery years. If Brandon Shores and Wagner are needed for RMR service beyond that

[40] PJM's planning parameters are released no later than 100 days ahead of the auction.

[41] The RMR resource also cannot have cleared in an RPM auction for the relevant delivery year. If it is already counted as capacity, PJM need not separately deem that resource as capacity supply.

[42] There have been some cases where the RMR agreement have been limited to addressing transmission needs, and specifically not capacity emergencies. PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 21.

[43] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 23.

period, PJM has stated that it could submit a future filing to extend these provisions and rules.[44] This extension may be necessary, as Talen and PJM recently announced that these RMR units would be in use until May 31, 2029.

Brandon Shores and Wagner have an estimated UCAP of 1,569 MW, based on ELCC ratings for 2026/2027.[45] The inclusion of Brandon Shores and Wagner will provide a much-needed injection of supply into the BGE LDA, as well as into the SWMAAC LDA, the parent LDA of BGE and Pepco LDAs (where DC is located).

Rights and Obligations for RMR Resources Participating in the Capacity Market

FERC has approved PJM's proposal that RMRs that participate in the capacity auction will not be subject to the same rights and obligations of other generators, such as operational testing or Non-Performance Charges for underperformance during grid emergencies. PJM argues that the four criteria which determine RMR participation "provide sufficient structural assurances that these resources will perform during capacity emergencies."[46] However, this argument is far from certain; PJM's criteria focus on whether the RMR is *able* to perform during grid emergencies, not whether it *will* indeed perform. As the current RMR rules stand, there may not be a strong incentive for the RMRs to perform for all grid emergencies, and the lack of incentive could erode their capacity contributions.

In contrast, the Consumer Advocates' request was for complete capacity market participation by RMR resources, which would require full performance when these resources are needed.[47] This approach by PJM also differs from other RTOs. In ISO New England, RMRs have capacity supply obligations,[48] suggesting that they are subject to performance penalties. Similarly, it appears that in NYISO and MISO, RMRs are also subject to performance penalties.[49]

RMR Capacity Market Revenue Crediting Mechanism

Now that RMRs will be participating as supply in the upcoming auctions, FERC has also approved a crediting mechanism for any revenues the RMR resource will make in the capacity market. Capacity market revenues will be credited back to the LDAs that are paying for the out-of-market RMR

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[44] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 16.

[45] ELCC Class Ratings for the 2026/2027 Base Residual Auction. PJM. Available at: https://www.pjm.com/-/media/DotCom/planning/res-adeq/elcc/2026-27-bra-elcc-class-ratings.pdf.

[46] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 15.

[47] Complaint of Joint Consumer Advocates. FERC EL25-18, page 5.

[48] ISO New England. October 9, 2024. ISO's Thinking on Representing Retained Resources in the Capacity Market. NEPOOL Markets Committee (MC). Available at: https://www.iso-ne.com/static-assets/documents/100016/a05_mc_2024_10-16_representing_retained_resources_iso_memo.pdf.

[49] Staevska, A., Foley, P. January 18, 2023. RTO/ISO Deactivation Processes. Deactivation Enhancements Senior Task Force. PJM.

arrangement. As discussed above, an RMR resource is already being compensated for its operation and maintenance through the RMR arrangement. These costs are allocated to LDAs and their electricity customers following the cost allocation of the transmission investments that will eventually eliminate the RMR need. As part of the RMR and auction reforms, the LDAs that are paying for the cost of the RMR arrangement will now be the ones who receive the resource's capacity market revenues. This approach will prevent electricity customers from paying twice for the RMR. On the other hand, it will have no impact on the owner of the RMR resource, who will continue to receive the full approved RMR cost recovery amount. As PJM stated, "The RMR resource owner is already being fully compensated for its operation through the RMR agreement, and the RMR resource owner faces no performance risk as the resource is not eligible for Non-Performance Charges. Thus, there is no reason to compensate the RMR resource owner" with any capacity market revenues.[50]

RMR Participation as a Price Taker

Going forward, the RMR resource will participate in the capacity auction as a "price taker," meaning it will have an offer price of $0/MW-day and is therefore guaranteed to clear in the market. The resource thus cannot be the marginal resource and set the clearing price. This approach is consistent with ISO New England's treatment of RMRs in its capacity markets. PJM's Internal Markets Monitor also recommended that PJM include RMRs as price takers in its future BRAs.[51]

Some argue that RMRs participating as a price-taker could result in artificial price suppression, as the offer price does not reflect its true forward-going avoidable costs. For this reason, the New York ISO (NYISO) requires RMRs to offer in at levels no lower than their going-forward costs, which when considering revenues received through the out-of-market RMR agreement, should be relatively low.[52]

3.2. Upcoming Changes to the Demand Curve

Recent History of PJM's Demand Curve Parameters

Every four years, PJM reviews its VRR curve in its Quadrennial Review. Since 2011, PJM has defined the maximum auction price (i.e., maximum point on the VRR curve) as the higher of either Gross CONE or 1.5 times Net CONE.[53] For all previous auctions, PJM estimated Net CONE using a gas-fired simple-cycle CT plant. As described in Section 1.2 (Supply and Demand Curves), Net CONE is a key parameter in defining the shape of the VRR curve. When Net CONE changes, the VRR curve shifts up and down. For instance, when there is a higher cost of new entry, Net CONE increases, which pushes point A and B on

[50] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 33.

[51] Comments of the Independent Market Monitor for PJM. January 6, 2025. Docket No. ER25-682-000.

[52] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 28.

[53] Complaint of Governor Josh Shapiro and the Commonwealth of Pennsylvania, Docket No. EL-25-46. December 30, 2024, at page 8.

VRR curve upwards and increases the steepness of the VRR curve's slope. This could lead to more price volatility and/or higher prices. When Net CONE is at zero (which can occur if the E&AS offsets are higher than gross CONE), Point B falls to zero, creating a steep two-point VRR curve (known as a "collapsed" curve).

In recent years, PJM's capacity market was consistently over-procuring capacity above the reliability requirement (the target level of capacity to meet PJM's reliability standard). As a result, FERC had originally approved PJM's shift of its reference source to a combined-cycle (CC) plant and set the maximum price at the larger of Gross CONE or 1.75 times Net CONE (instead of using a 1.5 multiplier), starting in the 2026/2027 delivery year. These two changes produce a steeper VRR curve "that more strongly controls RPM quantity clearing outcomes, increasing certainty that sufficient quantity will be procured while guarding against over procurement."[54] However, a steeper VRR curve trades controlling quantity over more volatile prices.

Today, over-procurement of capacity is no longer the primary concern for PJM's wholesale markets. As discussed elsewhere in this report, increasing demand along with changes to supply (e.g., new ELCC accreditation, etc.) and a clogged interconnection queue has led to increasingly eroding reserve margins across PJM. Instead of over-procurement, PJM now faces potential capacity shortfalls.[55] As a result, in February 2025, PJM received approval from FERC to *not* switch to a CC plant as its reference resource and instead maintain the CT reference resource. However, in that same PJM reform package proposed in December 2024, PJM did not address the 1.75 multiplier for Point A on the VRR curve. In February 2025, PJM and the Pennsylvania Governor's Office jointly proposed to add a price cap and floor to the VRR curve; this is recently approved by FERC at the end of April 2025.[56]

VRR Curve Price Cap and Price Floor

In response to over-procuring capacity in recent years, PJM previously made adjustments to both the reference resource and point A on the VRR curve (the 1.5 vs 1.75 multiplier to Net CONE). However, despite their correlation, in its more recent capacity market reforms for the 2026/2027 and 2027/2028 auctions, PJM only adjusted the reference technology. It did not address the maximum price; Point A on the VRR curve is still set to either Gross CONE or 1.75 Net CONE, whichever is larger. However, the multiplier does not affect the shape of the VRR curve for the RTO and the majority of modeled LDAs, including Pepco, and its parents SWMAAC and MAAC. In all these cases, Gross CONE is larger than 1.75 times Net CONE, and thus defines the top point on the demand curve. As seen below in Figure 5, using Gross CONE creates a very steep curve, with maximum prices as high as $505.73/MW-day for the RTO instead of $371.25/MW-day (1.75 times Net CONE) or $318.21/MW-day (1.5 times Net CONE).

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[54] PJM Recommendations – Quadrennial Review. Available at: https://www.pjm.com/-/media/DotCom/committees-groups/committees/mrc/2022/20220824/item-02---3-pjm-position-on-2022-quadrennial-review-recommendations.ashx.

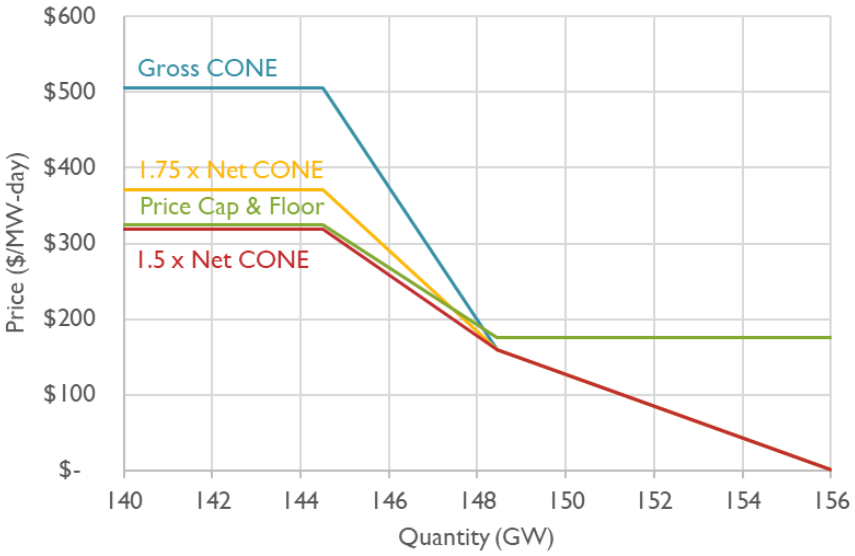
[55] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 40.

[56] Order Accepting Tariff Revisions and Dismissing Complaint, April 21, 2025. FERC ER25-1357.

Pennsylvania Governor Shapiro issued a complaint to FERC arguing that PJM should remove Gross CONE from the maximum VRR calculation and restore the 1.5 multiplier to Net CONE. The governor's office argued that if the market was functioning as intended, the record-setting prices would encourage investment in new generation. Yet due to the severely clogged interconnection queue and the compressed auction schedule, market participants are not able to respond to these high prices, and customers are saddled with the bill.

PJM and the Governor of Pennsylvania's Office engaged in confidential settlement discussions and on January 23, 2025, introduced a new proposal for a price cap and price floor for the upcoming two BRAs. The price cap and floor would be set at $325/MW-day UCAP and $175/MW-day UCAP, respectively (Figure 5). They argue that the floor protects suppliers while the cap protects consumers.

Figure 5. RTO VRR Curve permutations for the 2026/2027 delivery year



The maximum price of $325/MW-day is higher than the weighted average historical clearing price (prior to the 2025/2026 BRA) of $116.30/MW-day.[57] It is also 14 percent higher than the average of 1.5 times Net CONE values for all the LDAs.[58] Nonetheless, the independent market monitor has estimated that

[57] Monitoring Analytics. February 7, 2025. PA/PJM Agreement re Maximum and Minimum RPM Prices. Special Member Committee meeting. Available at: https://www.monitoringanalytics.com/reports/Presentations/2025/IMM_MC_PA_PJM_Agreement_Max_Min_RPM_Prices_20250207.pdf.

[58] Monitoring Analytics. February 7, 2025. PA/PJM Agreement re Maximum and Minimum RPM Prices. Special Member Committee meeting. Available at: https://www.monitoringanalytics.com/reports/Presentations/2025/IMM_MC_PA_PJM_Agreement_Max_Min_RPM_Prices_20250207.pdf.

the price cap of $325/MW-day could save electricity customers across PJM $8.7 billion per year, relative to the initial maximum price of the greater of Gross CONE or 1.75 times Net CONE.[59]

The Joint Consumer Advocates protested both the price cap and floor at FERC, arguing that they were too high and ultimately unjust and unreasonable.[60] PJM's independent market monitor also opposed the price floor and PJM's proposed VRR shape, arguing there is no economic logic or support in the tariff to justify these changes.[61] FERC approved the VRR curve price cap and floor for the 2026/2027 and 2027/2028 delivery years in April 2025.[62]

Reference Technology and the VRR Curve

CC plants have longer run times over the course of a year relative to a CT plant, and thus they typically make more money in the energy market. As a result, they have much higher E&AS offsets in the Net CONE calculation; using a CC plant reference technology would mean that Net CONE falls to $0/MW-day in the RTO and in certain LDAs. Point B on the VRR curve is 0.75 times Net CONE; if net CONE falls to zero, so does point B on the curve. This results in a very steep 2-point VRR "curve," which can lead to substantial price volatility. Since FERC has approved maintaining a CT reference resource, this effect will no longer occur (until at least the upcoming Quadrennial Review, scheduled for the third quarter of 2025).[63]

Non-Performance Charges

Net CONE is not just used in determining the points on the VRR curve; it also defines non-performance charges. The non-performance charge rate ($/MW-5-minute interval) is a penalty charged to generators who do not fulfil their capacity commitment during grid emergencies (called Performance Assessment Intervals (PAI)). In other words, generators are charged a penalty if they are not able to provide the amount of capacity they are contracted to provide through the capacity market. The charge is based on Net CONE and their capacity shortfall during PAIs. With the switch to a CC plant reference technology, where Net CONE falls to zero (for the RTO and in certain LDAs), the non-performance charge would also fall to zero. If this were to happen, power plants could lose their incentive to fulfil their capacity commitments, yet they would still be paid the clearing price for the entire delivery year. This scenario poses a potential risk to the reliability of the grid. To minimize this risk going forward, in addition to retaining a CT as the reference resource, PJM will implement a uniform RTO-wide non-performance

[59] The independent market monitor updated CONE values and the higher forecasted peak load but otherwise kept all parameters the same as the 2025/2026 BRA. Ibid.

[60] Protest of Joint Consumer Advocates. FERC ER25-1357-000. March 17, 2025.

[61] Comments of the Independent Market Monitor for PJM. FERC ER-25-1357-000. March 17, 2025.

[62] Order Accepting Tariff Revisions and Dismissing Complaint, April 21, 2025. FERC ER25-1357.

[63] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 37.

charge (rather than LDA-specific charges). According to PJM, an RTO-wide non-performance charge is less likely to drop to $0 than LDA-specific non-performance charges.

Net CONE and Reactive Power

PJM is removing Reactive Power compensation from E&AS offsets for the Net CONE calculation effective for the 2026/2027 delivery year. Unlike real power, reactive power is not consumed by the load; instead, it is power that oscillates between load and the source within a circuit and is crucial in maintaining voltage levels. In Order No. 904, FERC determined that it was unreasonable and unjust for transmission providers to charge for reactive power within the standard power factor range.[64] In response to this final order, PJM is now eliminating the $2,546 per megawatt-year revenue from reactive power services from the EAS offsets to determine the Net CONE for the 2026/2027 BRA.[65] This change will increase Net CONE and shift the VRR curve upwards, increasing its steepness and potentially resulting in higher capacity prices.

4. POTENTIAL ELECTRIC BILL IMPACT OF 2026/2027 CAPACITY AUCTION

We assessed the bill impacts for four scenarios for the upcoming 2026/2027 BRA (currently scheduled for July 2025). These scenarios are not definitive or fully accurate predictions of the next BRA clearing price, as there are numerous factors that are changing and impossible to accurately predict. Nonethless, these scenarios can help estimate a range of possible bill impacts for electricity customers in DC associated with upcoming changes to PJM's capacity market.

All scenarios account for updated ELCC values; as shown in Table 5, in Section 2.3 above, ELCC values are decreasing for the majority of resource types for the 2026/2027 BRA. This will shrink supply by about 4,600 MW across the RTO. All scenarios also include Brandon Shores and Wagner RMRs participating as supply-side resources, increasing supply by roughly 1,580 MW, along with the resources that were previously exempt from participating. We used PJM's "RPM Existing Resource List" for the 2025/2026 delivery year[66] and added in planned retirements from PJM's list of "Generation Deactivations."[67] The scenarios are as follows:

[64] Compensation for Reactive Power Within the Standard Power Factor Range, Order No. 904, 189 FERC ¶ 61,034 (2024)

[65] Revision to Reliability Pricing Model FERC docket No. ER25-628-000, at 81.

[66] PJM. Capacity Market (RPM): 2026/2027. Available at: https://www.pjm.com/markets-and-operations/rpm.

[67] PJM. Generation Deactivations. Available at: https://www.pjm.com/planning/service-requests/gen-deactivations.

1. The **No Additional New Builds** scenario includes all PJM existing and new resources (as per PJM's Existing Resource List), including the previously exempt wind, solar, storage, and hybrid resources. When including the RMR units alongside the updated ELCC ratings and retirements, there is a *reduction* of supply of approximately 1,500 MW UCAP.

2. The **Some New Entry** scenario includes an additional 2,000 UCAP of new builds (planned resources).[68] This scenario also includes all the resources included in Scenario 1, resulting in an addition of 500 UCAP.

3. The **Price Floor** scenario examines what it would take to reach the recently approved clearing price minimum of $175/MW-day. We estimate that the region would need approximately 15,000 MW UCAP more supply (generation capacity and/or demand response) to reach the price floor. This quantity of new capacity is nearly impossible, given the current queue constraints and the current capacity under construction.

4. The **No Price Cap** scenario is a sensitivity on scenario 2, to better understand the bill impact if the price cap had not been approved (i.e., it demonstrates potential bill savings of the price cap to DC consumers). The inputs for this scenario are the same as scenario 2 ("some new entry").

For each of these scenarios, we estimated the VRR curve based on the 2026/2027 planning requirements[69] (the forecasted peak load, installed reserve margin, and Net CONE were released on March 31, 2025, without the VRR curve itself). We assume no changes to demand response resources relative to the 2025/2026 BRA.

For the supply curve, we used the smoothed supply curve from the 2025/2026 BRA.[70] The supply curve is not smoothed in reality; it is instead a step-wise function representing discreet offer bids (quantity and price). We added in Brandon Shores and Wagner's estimated UCAP as price takers (shifting the supply curve to the right roughly 1,600 MW). Without having any offer price data, we assumed that all additional new supply resources were added as price takers (though this is unlikely to be true in reality). New supply (beyond Brandon Shores and Wagner) was allocated proportionally to each LDA relative to peak demand. We also shifted the supply curve to the left by roughly 1,400 MW to account for the planned retirements, and again by 4,600 MW to account for new ELCC ratings. In reality, it is likely that the supply curve would also shift downward with reductions in supply, not just leftward; however, without offer prices and specific bid data, we could not include that adjustment in the analysis. This analysis is simply a best guess and provides a possible range of bill impacts for DC electricity customers that could be seen as a result of the upcoming capacity market changes in PJM.

[68] There are roughly 1,500 MW of UCAP (thermal, intermittent, ant storage) resources that are reporting to EIA as "planned" resources that are expecting to be online by the beginning of the 2026/2027 delivery year.

[69] Assuming the VRR curve maximum is the greater of Gross CONE or 1.75 Net CONE.

[70] PJM Interconnection. September 13, 2024. 2025/2026 BRA Supply Curves. Available at: https://www.pjm.com/-/media/DotCom/markets-ops/rpm/rpm-auction-info/2025-2026/2025-2026-bra-supply-curves.pdf.

As described in Section 2, DC electricity customers could see an additional $10 on their monthly bills starting around June 2025 as a result of the latest BRA for the 2025/2026 delivery year, incremental from the previous 2024/2025 BRA. We estimate that residential electricity bills in DC could increase by an additional $1 for the 2026/2027 delivery year (incremental to the $10 price increase expected in the 2025/2026 delivery year (Table 7). If there was approximately 15,000 MW more supply available in all of PJM for the upcoming auction (a highly unrealistic scenario), average residential monthly bills could decrease by $5 per month, relative to the 2025/2026 delivery year (Table 7). If the price cap had not been approved, and some new resources had still been built, average residential bills could have increased by an additional $9 for the 2026/2027 delivery year. Without substantially more supply, the RTO could clear at the price maximum.

Table 7. DC bill impacts for potential results of the 2026/2027 capacity auction relative to 2025/2026 results

	No Additional New Builds	Some New Entry	Price Floor	Some New Entry with No Price Cap
Estimated RTO Clearing Price	$325/MW-day	$325/MW-day	$175/MW-day	$506/MW-day
Residential Average Monthly Bill Change (relative to previous year)	+ $1	+ $1	- $5	+ $9
Commercial Average Monthly Bill Increase (relative to previous year)	+ $26	+ $26	- $172	+ $321

Source: Synapse analysis; see description in text.

We assume that neither the DOM LDA nor the BGE LDA will separate from parent LDAs as they did in the 2025/2026 BRA. This is due to transmission upgrades which will increase the DOM LDA's import capacity, and as a result Brandon Shores and Wagner returning to the BGE LDA's supply curve. Other LDAs could separate, such as the MAAC LDA, as it has done in recent years. However, without recent supply curves available for the MAAC LDA, we are unable to estimate the clearing price for MAAC, or other LDAs. As a result, for the sake of this bill impact analysis, we assume that no other LDA separates. MAAC has also only cleared above the RTO by a few dollars in recent years (and did not separate at all in the 2025/2026 BRA), therefore we do not expect this assumption to substantially affect the results. It is unlikely that the SWMAAC LDA would separate from the MAAC LDA, or that the PEPCO LDA would sperate from SWMAAC, given the amount of local capacity and import capability currently available for both LDAs.

We used the same methodological approach for estimating the 2025/2026 incremental bill impacts (as described in Section 2.2). In this case, we also estimated the Capacity Transfer Rights (CTR) to estimate the cost for consumers for the 2026/2027 BRA, a key part of the customer impact analysis. When an LDA has a higher clearing price than its parent LDA, there is a "locational price adder" to represent the higher clearing price relative to the RTO clearing price. CTRs are allocated to consumer loads within an LDA that

experiences price separation. The CTRs are payments equal to the locational price adder times the load's *pro rata* share of the lower-priced capacity imported into that LDA. CTRs serve to offset a portion of the higher capacity prices for customers in that constrained LDA. We used the CTR allocation and annual capacity market costs for customers provided in PJM's 2025/2026 Base Residual Auction Results (Excel workbook), adjusted to be reflective of our expectations for the 2026/2027 BRA.

4.1. Potential Impacts for the 2027/2028 Delivery Year

As PJM has stated itself, we will likely continue to see a tightening of supply and demand for the foreseeable future.[71] As described above, a substantial amount of capacity is needed to maintain capacity prices close to the proposed floor of $175/MW-day. This suggests the clearing price and associated bill impacts will remain high until the implementation of more substantial reforms, particularly those focused on the interconnection queue. As long as load forecasts continue to rise in PJM, and other market factors (already present in the last auction) persist, we expect that clearing prices will remain high.

5. INTERCONNECTION QUEUE REFORMS

Delays with PJM's interconnection queue have prompted concerns about the region's resource adequacy. In addition, PJM's interconnection queue issues have raised concerns about DC and PJM states' ability to meet their renewable energy targets. The capacity market is designed to send a price signal: when prices are high, plant owners and operators should build more plants for new entry into the market. However, currently, the PJM interconnection queue is clogged and not operating as designed, thereby limiting the market's ability to function properly and fairly. This section explores the barriers to interconnecting new clean energy resources and ongoing changes to PJM interconnection queue process.

The clogged queue could have a major impact on electricity customers in DC and throughout the region. On behalf of Evergreen Action, Synapse conducted power sector analysis, bill impact analysis, and job impact analysis to understand the benefits of resolving these queue constraints to customers and residents in the PJM states. Our analysis shows that if PJM continues down its current path, residential electricity bills in the region are expected to increase by nearly 60 percent by the 2036–2040 period compared to historical levels. However, if PJM adequately implements interconnection reforms to

[71] PJM Interconnection. December 9, 2024. Revisions to Reliability Pricing Model, Docket No. ER25-682, page 5.

enable the deployment of more cost-effective energy generation, largely comprised of clean energy sources, electricity bills are projected to decrease 7 percent within the same time period.[72]

5.1. Background on DC's Renewable Energy Portfolio Standards

DC first established renewable energy targets in 2005 when it passed the Renewable Energy Portfolio Standard (REPs) Act.[73] The District has updated these targets several times since. Most recently the Local Solar Amendment Act of 2022 set the following targets (effective March 10, 2023): under the RPS, electricity suppliers must buy 100 percent of their power from renewable sources by 2032, with 15 percent coming from local solar power by 2041.[74] This is one of the highest renewable energy targets in the country.[75] Pepco, the distribution utility serving DC, estimated that the RPS resulted in a monthly bill impact of $22 to $26 on the average residential bill, in May and June 2025.[76]

5.2. Current PJM Interconnection Queue

PJM's queue currently has 290 GW of potential generating capacity awaiting interconnection.[77] The capacity primarily consists of renewable resources that could help DC and other states in the PJM region make substantial progress toward their renewable energy goals, as well as bring in much needed capacity to mitigate potential shortfalls across PJM. The queue is made up of 94 percent renewables and storage, and only 6 percent gas-fired resources, in MW terms.[78] There are currently no solar resources in DC in the PJM queue, though smaller projects interconnecting at the distribution level will likely be used to meet the solar carve-out requirement and avoid the PJM queue altogether.

Resources in PJM's queue have faced long wait times and expensive network upgrades over the past several years. Between 2000 and 2018, only 24 percent of projects in PJM's interconnection queue were completed, and withdrawal rates were higher for solar and battery storage projects than for gas or wind

[72] Chavin, S., Knight, P., Shenstone-Harris, S., Zeng, A., Fuzaylov, A., Hittinger, J. April 15, 2025. Tackling the PJM Electricity Cost Crisis. Prepared for Evergreen Collective by Synapse Energy Economics. Available at: https://www.synapse-energy.com/tackling-pjm-electricity-cost-crisis.

[73] Renewable Energy Portfolio Standards Act (REPS Act) Code of the District of Columbia § 34–1432.

[74] District of Columbia Department of Energy & Environment. Renewable Energy in the District. Available at: https://doee.dc.gov/service/renewable-energy-district#:~:text=Under%20the%20RPS%2C%20electricity%20suppliers,its%20projected%202032%20GHG%20emissions.

[75] Clean Energy States Alliance. "Table of 100% Clean Energy States." Available at: https://www.cesa.org/projects/100-clean-energy-collaborative/guide/table-of-100-clean-energy-states/.

[76] Pepco Holdings. May 21, 2025. PJM Taskforce Bill Impacts Summary.

[77] PJM. Planning: Service Requests. Available at: https://www.pjm.com/planning/service-requests.

[78] Energy Transition in PJM: Resource Retirements, Replacements & Risks, PJM Interconnection, L.L.C., 2 (Feb. https://www.pjm.com/-/media/library/reports-notices/special-reports/2023/energytransition-in-pjm-resource-retirements-replacements-and-risks.ashx ("Four Rs Report").

projects.[79] Since 2020, 45 percent of projects added to the queue have withdrawn before completing the interconnection process, and 64 projects (over 5 GW of capacity) currently in the queue submitted their interconnection requests before 2020. Meanwhile, interconnection costs reached an average of $240/kW in 2020 to 2022, a substantial increase from the $29/kW average in 2017 to 2019.[80]

5.3. Interconnection Queue Reforms

General Interconnection Reforms

PJM has been making efforts to improve the interconnection queue in recent years. In 2020, PJM initiated a stakeholder process to explore interconnection reforms, which led to a pause of the queue in 2022 to allow PJM to implement the approved reforms.[81] This primarily included a transition from a serial first-come, first-served process of reviewing interconnection requests to a first-ready, first-served cluster study process. This approach allows the grid operator to review more requests in a shorter amount of time and focuses on projects that are prepared to move forward rather than speculative projects or projects that are less likely to be built. These reforms included:

- a fast lane for certain projects to address the backlog;
- new requirements for commercial readiness deposits and improved site control procedures;
- an expedited process to memorialize interconnection agreements for projects that do not require network upgrades or further studies; and
- transition from conducting studies on a serial-basis to a cluster-process.[82]

In July of 2023, the FERC issued Order 2023, which required all RTOs across the country to address interconnection barriers, which are experienced nationwide. Many of the reforms required in that Order are similar to reforms already underway in PJM. PJM submitted a compliance filing on May 16, 2024, requesting that its previously filed reforms be considered sufficient to comply with Order 2023 objectives and that FERC should grant "independent entity variations" where it does not meet specific Order requirements that would allow PJM to be compliant in the eyes of the FERC without having to

[79] Rand, Joseph, Manderlink, Nick, Gorman, Will, Wiser, Ryan, Seel, Joachim, Mulvaney Kemp, Julie, Jeong, Seongeun, Kahrl, Fritz.. 2024. Queued Up: 2024 Edition. Lawrence Berkeley National Laboratory. Available at: https://emp.lbl.gov/sites/default/files/2024-04/Queued%20Up%202024%20Edition_R2.pdf.

[80] Joachim, Rand, Joe, Gorman, Will, Millstein, Dev, Wiser, Ryan. 2023. Interconnection Cost Analysis in PJM Territory. Lawrence Berkeley National Laboratory. https://eta-publications.lbl.gov/sites/default/files/berkeley_lab_2023.1.12-_pjm_interconnection_costs.pdf.

[81] PJM Interconnection, L.L.C., Tariff Revisions for Interconnection Process Reform, Docket No. ER22-2110-000 (June 14, 2022).

[82] PJM Interconnection, L.L.C., Tariff Revisions for Interconnection Process Reform, Docket No. ER22-2110-000 (June 14, 2022).

deviate from its ongoing reforms.[83] Order 2023 litigation is still ongoing, as PJM continues to move ahead with the interconnection reforms already in motion.

PJM's transition to this new process established in its 2022 filing is already underway. PJM began the Transition Period to finish clearing the backlog of interconnection requests on July 10, 2023 (of which PJM had previously paused its review, while it sought to develop and implement the abovementioned queue reforms). The interconnection process is still complicated and lengthy: it requires projects to move through feasibility, system impact, and facilities studies—sometimes multiple rounds of each—before getting interconnection agreements and achieving commercial operation. The first of the Transition Cycles (TC1) of projects in the queue began its Phase II System Impact Study on June 21, 2024, and was reportedly completed on December 20, 2024.[84] At that stage, 204 projects totaling roughly 30 GW of mostly renewable or hybrid generation decided to continue through the interconnection process to the next stages of facilities studies needed to receive interconnection agreements.

Meanwhile, 284 additional projects qualified for an Expedited "Fast Lane" Process. Both TC1 and the "Fast Lane" projects are expected to complete the interconnection queue process by late 2025. PJM plans to complete the Transition Cycle #2 by the third quarter of 2026. Since PJM has been implementing its reform processes, there are already another 38 GW of projects that have completed the queue process but have not yet been built.[85]

Resource Reliability Initiative

Following to calls for interconnection queue reform after the sky-high 2025/2026 auction results, PJM proposed its Reliability Resource Initiative (RRI)[86] in a filing to the FERC on December 2023. FERC approved the RRI on February 2025.[87] PJM described this initiative as a "one-time expansion of eligibility criteria for Transition Cluster #2 to add more resources" to the grid and address resource adequacy concerns in the region in the 2029/2030 delivery year and beyond.[88] With RRI, PJM aims to improve resource adequacy and encourage new entry into the market, but it may create challenges for PJM states and the District as they strive to meet RPS targets. Consumer advocates in the region called for

[83] PJM Interconnection, L.L.C., Order Nos. 2023 and 2023-A Compliance Filing, Docket No. ER24-2045-000 (May 16, 2024).

[84] PJM, "Transition Cycle #1 Phase II System Impact Study Posting Date" (December 16, 2024).

[85] PJM. August 2024. "PJM Reaches Next Interconnection Milestone", available at: https://insidelines.pjm.com/pjm-reaches-next-milestone/.

[86] PJM. 2024. "PJM Capacity Auction Procures Sufficient Resources to Meet RTO Reliability Requirement, Tighter Supply/Demand Balance Drives Higher Pricing Across the Region." Available at: https://insidelines.pjm.com/pjm-capacity-auction-procures-sufficient-resources-to-meet-rto-reliability-requirement/.

[87] Order Accepting Tariff Revisions. FERC ER25-712-000. February 11, 2025, at 9.

[88] Order Accepting Tariff Revisions. FERC ER25-712-000. February 11, 2025, at 3.

reforms to prioritize ready-to-study projects that will be sited in LDAs that are more likely to be constrained. However, RRI will focus on different criteria.[89]

The RRI will expand eligibility for its second Transition Cycle of projects, TC2, based on the following criteria and point scale:

- Ability to provide substantial amounts of unforced capacity (35 out of 100 points)
- High ELCC ratings (20 out of 100 points)
- Location in areas where capacity is scarce (10 out of 100 points)
- Location in areas with headroom on the transmission system to accommodate new generation (5 out of 100 points)
- Ability to be constructed and achieve commercial operation quickly to meet PJM's near-term resource adequacy needs, specifically a commercial operation date between 2028 and 2031 (10 out of 100 points)
- Uprating of projects already in commercial operation, that have interconnection-related service agreements, or are already under study (10 out of 100 points)
- Secured permits, siting, financing, etc. (10 out of 100 points)

The RRI raises several concerns. PJM claimed in its filing that the initiative would likely accelerate interconnection of gas and storage projects, but that there was the potential that some other resource types could qualify. However, environmental groups are worried that RRI is unduly discriminatory against non-dispatchable resources in favor of gas, which has a high reliability rating. The potential impact of this expansion of TC2 on primarily renewable resources already in the cluster is unknown, but PJM does not plan to hold them harmless should any upgrade costs increase.[90] In other words, if resources in the TC2 cluster face shifting costs from the addition of these RRI resources, the resources already in TC2 would not be responsible only for their initial cost expectations. Others are concerned that this initiative will not improve resource adequacy, particularly as it does not have any requirements that these projects are actually put in service by 2030. In her dissent, FERC Commissioner Chang said "By facilitating queue jumping for large generators, which are the most challenging to develop, acquire the necessary environmental permits, and obtain adequate material supplies and labor for construction and focusing primarily on large generators over speed of development, PJM's proposal may not actually resolve its impending capacity shortage."[91] Additional delays beyond the queue also suggest that these resources may not be in service by 2030. Long interconnection processes in PJM are "exacerbating siting and permitting challenges and leading to knock-on delays in equipment procurement and financing decisions," which mean that once developers have their Interconnection Service Agreements, it will still likely be at least two years before projects can enter service, if not more.[92]

[89] Complaint of Joint Consumer Advocates. FERC EL25-18, page 5.

[90] Tariff Revisions for Reliability Resource Initiative. FERC ER25-712-000. December 13, 2024, page 29-30.

[91] Order Accepting Tariff Revisions, Commissioner Chang's Dissent. FERC ER25-712-000. February 11, 2025, page 4.

[92] Complaint of Joint Consumer Advocates. FERC EL25-18, page 12.

Prioritization of gas resources will likely create a new barrier to achieving RPS targets. The federal GRID Power Act introduced on February 6, 2025, would broadly allow grid operators to prioritize dispatchable power plants in their interconnection queues. If passed, this Act could worsen the challenges associated with the RRI.[93]

Clean Repowering

Clean repowering, or connecting new resources through surplus interconnection or generator replacement, can help bring more renewable resources online and ultimately help the District meet its RPS goals. Through surplus interconnection, a resource can connect at the same point of interconnection (POI) as an existing resource and dispatch energy when the existing resource is not operating to its full capacity. Generator replacement is when an existing resource retires and a new resource can make use of its transmission infrastructure by taking over its CIRs and connecting to the transmission system at its POI. PJM is exploring how to reduce barriers for these two pathways.

PJM filed a proposal with FERC on December 2024 to remove barriers for surplus interconnection, which FERC approved in February 2025.[94] The filing makes the following changes:

- It adds language to the Tariff to explicitly allow for the construction of additional physical interconnection facilities where surplus project developers need them to accommodate the requested surplus interconnection service.
- It eliminates the current restrictions on surplus interconnection service in instances where the service:
    i. affects the determination of Network Upgrades for projects already in the interconnection process; or
    ii. results in material adverse impacts on short circuit capability limits, steady-state thermal and voltage limits, or dynamic system stability and response
- It expands the availability of surplus interconnection service to projects that have an Interconnection Service Agreement or Generator Interconnection Agreement but are not yet constructed and operating.

PJM is also exploring ways to enhance the transfer of CIRs from retiring resources to new generation resources to enable smoother, more efficient generator replacement. Together, these two interconnection pathways can help more clean resources interconnect.

[93] Howland, Ethan. February 7, 2025. "RTOs could fast-track dispatchable generation under House, Senate bills." *Utility Dive*. Available at: https://www.utilitydive.com/news/fast-track-grid-interconnection-ferc-pjm-house-senate-bill/739523/?utm_source=Sailthru&utm_medium=email&utm_campaign=Issue:%202025-02-07%20Utility%20Dive%20Newsletter%20%5Bissue:70277%5D&utm_term=Utility%20Dive.

[94] Order Accepting Tariff Revisions. FERC ER25-778-000. February 11, 2025.

Going Forward

As capacity market issues worsen, and as DC and states around the country try to make progress in meeting their RPS targets, there is much uncertainty about PJM and other RTOs' ability to interconnect sufficient new resources fast enough. DC can support efforts by PJM to make surplus interconnection and the transfer of CIRs for generator replacement easier and more broadly available. The DC OPC can also work with other consumer advocates and PJM stakeholders to advocate for interconnection processes and other policies that do not place renewable generators at a lower priority.

There is an opportunity for DC to explore district-level changes to ensure smoother interconnection processes. The District could conduct a study to determine how local permitting and siting constraints impact interconnection timelines and how to reform them. Furthermore, the District may want to focus on the potential to connect renewable resources at the distribution-system-level, particularly solar resources that could satisfy the solar carve-out of the RPS requirement. Interconnections at that level can be managed outside of the PJM process and under greater direct control by DC and Pepco.

6. ONGOING REFORM DISCUSSIONS

6.1. Seasonal ELCC Adjustments for Gas-Fired Generators

In the November 2024 filing from consumer advocate offices, the group requested that PJM be required to adjust ELCC calculations for gas-fired generators.[95] ELCC accreditation for thermal resources are currently based on summer ratings, rather than winter ratings. The independent market monitor has stated that CC and CT generators can produce at higher levels in colder temperatures during the winter weather, which suggests that PJM undercounts their contribution. Consumer advocates, including the DC OPC, argue that using the lower summer ratings and accounting for the winter risks suppresses the available market supply.[96] The independent market monitor estimated that holding everything else constant, the use of summer ratings rather than winter ratings in the marginal based ELCC accreditation for CC and CT resources resulted in market revenue increases of 22.7 to 118.1 percent increase (or $2.72 billion to $7.95 billion) for the 2025/2026 BRA (depending on the reserve margin and holding all else constant).[97] PJM has not filed updates on this item to date, but this issue will likely arise again as additional reforms are discussed.

[95] Complaint of Joint Consumer Advocates. FERC EL25-18, page 5.

[96] Complaint of Joint Consumer Advocates. FERC EL25-18, page 27.

[97] Monitoring Analytics, Analysis of the 2025/2026 RPM Base Residual Auction Part A. Available at: https://www.monitoringanalytics.com/reports/Reports/2024/IMM_Analysis_of_the_20252026_RPM_Base_Residual_Auction_Part_A_20240920.pdf.

6.2. Load Forecasting Issues

PJM's capacity market is highly sensitive to PJM's load forecast: when demand increases, PJM procures more power in the market. PJM's 2025 long-term load forecast projects a sharp rise in electricity demand across its footprint (Figure 4), driven primarily by the anticipated expansion of data centers, particularly in northern Virginia.

Growing scrutiny from consumer advocates, PJM stakeholders, and independent experts suggests these projections may be speculative and overstated, especially beyond the short-term horizon. PJM's previous load forecasts overpredicted peak demand in 17 out of the last 18 years, raising concerns about the credibility of its projections.[98] The consistent historical over-forecast bias led to over-procuring capacity when compared to actual demand.[99] The over-procurement bias is also visible within the reserve margin metric. While PJM has one of the lowest reserve margin requirements of any RTO, due to consistent over-procurement of capacity, the actual procured reserves are some of the highest of any RTO.[100]

Current projections incorporate utility-supplied inputs that vary widely in methodology. Peak load forecasts for the Dominion LDA (in Virginia) have drawn attention for its rapidly escalating data center load projections.[101] While data center load in Dominion's territory reached about 4 GW in 2024, Dominion Energy (which provides local load projections for PJM's forecast) now expects that figure to exceed 15 GW within the decade.[102] These expectations are based on speculative development plans for data centers, many of which lack financial commitment and firm timelines. Trends such as higher energy prices in Dominion's service territory, increased geographic flexibility for data centers, and tax incentives in other regions could slow or end the existing trend of consistent data center growth in northern Virginia.[103] In addition, in January 2025, Chinese company DeepSeek's AI model was reported to require a fraction of the energy used for other AI models, while achieving the same results,[104] which suggests

[98] James F. Wilson, *Session 4: What's With the PJM Load Forecast?*, presented to the Organization of PJM States, Inc. (OPSI), October 22, 2024, https://opsi.us/wp-content/uploads/2024/10/4.-Wilson-OPSI-10-22-24-draft-10-18-24.pdf.

[99] The Brattle Group, April 2022, *Fifth Review of PJM's Variable Resource Requirement Curve.* Available at: https://www.brattle.com/wp-content/uploads/2022/05/Fifth-Review-of-PJMs-Variable-Resource-Requirement-Curve.pdf.

[100] Federal Energy Regulatory Commission (FERC), *2023 Common Metrics Report* (Washington, DC: Federal Energy Regulatory Commission, January 2024), 9, https://www.ferc.gov/sites/default/files/2024-01/2023_Common_Metrics_Report.pdf.

[101] James F. Wilson, *Session 4: What's With the PJM Load Forecast?*.

[102] Aurora Energy Research, *Impacts of Virginia datacenter demand growth on the power system*, June 2024. https://go.auroraer.com/l/885013/2024-06-19/n7nbj/885013/1718806706gUvUPURq/Aurora_Jun_2024_PJM_Load_Growth_Report.pdf.

[103] Aurora Energy Research, *Impacts of Virginia datacenter demand growth on the power system.*

[104] Ma, M., and Chediak, M. January 28, 2025. "DeepSeek's AI Model Just Upended the White-Hot US Power Market." *Bloomberg News*. Available at: https://www.bloomberg.com/news/articles/2025-01-28/deepseek-s-ai-model-just-upended-the-white-hot-us-power-market?embedded-checkout=true.

that the current PJM data center energy forecasts could be overstated. AI technology is still evolving and may become more efficient over time.

Furthermore, consumer advocates from five PJM states caution that PJM's current load forecasting approach does not differentiate between "firm" load growth and hypothetical future demand.[105] The consumer advocates suggest that PJM adopt a more cautious forecasting framework that incorporates only high probability loads backed by contracts (e.g., data center development contract), or a demonstrated need, and using scenario-based planning. These changes would better reflect uncertainty in sectors such as data centers where development is sensitive to factors such as land use, water availability, local opposition, and computational advancements. Without such reforms, PJM risks basing long-term infrastructure and capacity market decisions on unreliable assumptions, and leaving existing customers paying for the resulting over procurement.

6.3. RMR Reforms: Pro Forma RMR Arrangements

PJM currently handles RMR arrangements on a case-by-case basis, lacking the standardized *pro forma* framework seen in other RTOs. This ad hoc approach has raised concerns among stakeholders about transparency, predictability, and efficiency, particularly as aging resources and low-capacity factor plants face economic pressure to retire. ISO New England, CAISO, and MISO each have clear tariff-defined RMR structures while PJM remains the only RTO with a capacity market that does not yet have a *pro forma* RMR agreement in place.[106] Compounding the issue, PJM also has one of the shortest generator retirement notice periods among its peers, increasing the risk of last-minute reliability issues and the risk that PJM will implement reactive rather than proactive solutions.[107]

Recognizing these challenges, PJM has stated its intent to explore the development of standardized *pro forma* RMR arrangements, targeting implementation by the 2028/2029 delivery year.[108] Developing a *pro forma* RMR agreement could significantly improve consistency in how reliability resources are retained and compensated, while providing market participants greater clarity. For example, this could include formalizing the compensation structure for retained resources. Given PJM's access to detailed operational and market data, including insights into aging infrastructure and underperforming plants, it is well-positioned to identify reliability risks ahead of time. This raises the question of whether PJM could also explore extending its generator retirement notice period or actively engaging with at-risk resource owners earlier in the process. Such forward-looking measures, in tandem with a formalized

[105] Maryland Office of People's Counsel. *Letter to the PJM Board of Managers*. July 18, 2024. Available at: https://www.pjm.com/-/media/DotCom/about-pjm/who-we-are/public-disclosures/2024/20240718-med-opc-letter-to-pjm-board.ashx.

[106] America's Power, *Reliability Must Run Agreements* (Washington, DC: America's Power, October 13, 2022), https://americaspower.org/wp-content/uploads/2022/10/RMR-Agreements-1.pdf.

[107] America's Power, *Reliability Must Run Agreements.*

[108] Revisions to Reliability Pricing Model. FERC ER-682-000. January 6, 2025, page 8.

RMR structure, could better safeguard reliability while reducing reliance on emergency, non-standardized interventions.[109]

6.4. Energy Efficiency and its Treatment in the Capacity Market

In November 2024, FERC approved PJM's plan to omit energy efficiency resources from the capacity market effective November 6, 2024, a change that would impact the capacity auction for the 2026/2027 delivery year.[110] FERC found that this change would benefit consumers by reducing capacity prices without impacting resource adequacy. However, the overall impact on capacity prices remains to be seen, and many stakeholders opposed this change, asserting that load would no longer receive the demand-side benefits.

7. CONCLUSION

The recent PJM BRA for the 2025/2026 delivery year resulted in a seven-fold increase in RTO-wide clearing prices, with maximum prices in the BGE zone in Maryland and the DOM zone in Virginia. The auction resulted in the highest RTO-wide capacity prices ever seen in the region.

The price surge was driven by several factors, including resource retirements, RMR agreements, a clogged interconnection queue, and ongoing market rule changes—such as updates to resource accreditation. These developments, alongside increasing electricity demand, contributed to limited available supply and higher clearing prices.

In response, PJM and stakeholders have proposed reforms to better reflect changing market dynamics, several of which have already received FERC approval. In addition, ongoing implementation of queue reforms will help accelerate the interconnection of generation resources. Despite these reforms, PJM's capacity market could see prices that would be among the highest in PJM's history. Moreover, forecasted load growth, mainly driven by the rapid expansion of data centers, will likely result in capacity prices continuing to be high for the foreseeable future.

[109] Monitoring Analytics, *Comments of the Independent Market Monitor for PJM, Docket No. ER25-682-000* (Eagleville, PA: Monitoring Analytics, January 6, 2025), https://www.monitoringanalytics.com/filings/2025/IMM_Comments_Docket_No_ER25-682_20250106.pdf.

[110] Order Accepting Tariff Revisions. FERC ER24-2995-000. November 5, 2024.

8. GLOSSARY

BRA	Base Residual Auction	The PJM capacity auction, called the Base Residual Auction, procures "capacity" power supply resources in advance of the delivery year to meet electricity "resource adequacy" needs in the PJM service area, which includes all or part of 13 states and the District of Columbia. Auctions are usually held three years in advance of the delivery year. Due to recent changes in market design, among other factors, PJM held the most recent BRA, in July, 2024, for the delivery year starting June 1, 2025 (the BRA 25/26), with the auction held only about one year in advance of the beginning of the delivery year. PJM currently intends to conduct subsequent BRAs on an accelerated basis to enable returning to the 3-year forward schedule. The BRA is the first auction, in a cycle of several auctions for each delivery year underPJM's Reliability Pricing Model (RPM), or capacity market, where the majority of the RPM capacity is procured for a particular delivery year.
CONE	Cost of New Entry	CONE represents the total annual net revenue (net of variable operating costs) that a new generation resource would need to recover its capital investment and fixed costs, given reasonable expectations about future cost recovery over its economic life. CONE is the starting point for estimating the Net Cost of New Entry (Net CONE). Net CONE represents the first-year revenues that a new resource would need to earn in the capacity market, after netting out energy and ancillary service (E&AS) margins from CONE. This metric is used in calculating the VRR Curve (see below) which is used to define the administrative cost cap to the BRA.
CTR	Capacity Transfer Rights	A method of allocating the economic value of transmission import capability that exists into a constrained Locational Deliverability Area (LDA) to Load Serving Entities (LSE).
DY	Delivery Year	The PJM capacity auction procures commitments for a delivery year, beginning June 1 and ending May 30th. The RPM was and is intended to provide for the conduct of each annual capacity auction (or BRA) three years in advance of the beginning of the running of the delivery year commitment procured through the auction. Currently due to slippage resulting from multiple causes, PJM just completed the most recent BRA, in July, 2024, for the 25/26 delivery year, which begins at the same time (June 1, 2025) as the scheduled beginning of the Brandon Shores and Wagner RMR arrangements. The 24/25 delivery year was already procured through a previously completed auction.
E&AS	Energy & Ancillary Services Revenues	Revenues from the energy and ancillary services markets, which are unit-specific. E&AS are historically netted out of Market Seller Offer Caps, and/or Net Cost of New Entry calculations.
ELCC	Effective Load Carrying Capability	ELCC provides a way to assess the capacity value (or reliability contribution) of a resource (or a set of resources) that is tied to the loss-of-load probability concept. ELCC can be defined as a measure of the additional load that the system can supply with a particular generator of interest, with no net change in reliability. ELCC can be based on any reliability metric (e.g., Loss of Load Expectation (LOLE), Loss of Load Hours (LOLH), or Expected Unserved Energy (EUE)). PJM shifted from its prior use of LOLE to an EUE metric for the most recently completed BRA (2025/2026) which was conducted in July, 2024.
EUE	Expected Unserved Energy	This is defined as a measure of the resource availability to continuously serve all loads at all delivery points while satisfying all planning criteria. The EUE is

		energy-centric and analyzes all hours of a particular year. Results are calculated in megawatt hours (MWh). The EUE is the summation of the expected number of MWh of load that will not be served in a given year as a result of demand exceeding the available capacity across all hours.
FERC	Federal Energy Regulatory Commission	The federal agency that regulates wholesale electric power sales and transmission rates.
ICAP	Installed Capacity	A MW value based on the summer net dependable capability of a unit and within the capacity interconnection right limits of the bus to which it is connected.
IMM	Independent Market Monitor	PJM's Independent Market Monitor is responsible for guarding against the exercise of market power in PJM's markets and assisting in the maintenance of competitive and nondiscriminatory markets in PJM. The IMM operates independently from PJM staff and members to objectively monitor, investigate, evaluate, and report on PJM's markets. Monitoring Analytics serves as PJM's independent market monitor.
IRM	Installed Reserve Margin	Percentage value used to establish the level of installed capacity resources that provide an acceptable level of reliability.
LDA	Locational Deliverability Area	Sub-regions of PJM's "footprint" used to evaluate locational constraints of the electric grid. An LDA is an area or zone within the wholesale electric markets administered by PJM, in which local effects of transmission, load, and generating resources are separately accounted for in the operation of PJM's markets. In this report, costs described as allocated to or incurred by a LDA mean costs flowed through to the end-use customers located within that LDA.
LOLE	Loss of Load Expectation	Loss-of-load expectation defines the adequacy of capacity for the entire PJM footprint based on load exceeding available capacity, on average, only once in 10 years. This is generally defined as the expected number of days per year for which the available generation capacity is insufficient to serve the daily peak demand.
MSOC	Market Seller Offer Cap	PJM uses Market Seller Offer Caps to ensure that resources are submitting competitive offers into the capacity market, thus preventing sellers from exerting market power and setting artificially high prices. A resource's MSOC is equivalent to the costs it would avoid if it retired or if it did not clear in the capacity market and did not operate for the delivery year. It is the minimum capacity price a resource needs to take on a capacity obligation and continue operations for another year.
RMR	Reliability Must-Run	A generating unit slated to be retired by its owners but that is needed for reliability reasons. Typically, PJM requests that the unit remain operational beyond its proposed retirement date until transmission upgrades are completed.
RRI	Reliability Resource Initiative	The RRI represents a narrowly tailored, limited-duration proposal designed to expedite the interconnection of a limited number of shovel-ready generating resources that are not presently in the Transition Cycle #2 (TC2) interconnection queue. This proposal reflects the growing urgency to connect generating resources that have a high likelihood of being able to materially support resource adequacy and maintain grid reliability in the near term.
RPM	Reliability Pricing Model	PJM's capacity market design that includes a series of auctions to satisfy the reliability requirements of the PJM region for a delivery year. The majority of capacity is procured in the first auction for a particular delivery year, which is

		known as the Base Residual Auction. This auction is intended to be conducted three years in advance of a given delivery year. The RPM model works in conjunction with PJM's Regional Transmission Expansion Planning process to ensure the reliability of the PJM region for future years.
RTO	Regional Transmission Organization	The organization that coordinates, controls, and monitors a multi-state electric grid. In this report, RTO refers to PJM Interconnection, LLC (or PJM) which operates a competitive wholesale electricity market and manages the high-voltage electricity grid to ensure reliability in all or parts of Delaware, Illinois, Indiana, Kentucky, Maryland, Michigan, New Jersey, North Carolina, Ohio, Pennsylvania, Tennessee, Virginia, West Virginia, and the District of Columbia.
UCAP	Unforced Capacity	The megawatt (MW) value of a capacity resource in the PJM Capacity Market. PJM currently uses different methods to accredit the amount of UCAP specific resource types may offer into the PJM capacity market but was shifted to a marginal ELCC approach for the recently completed BRA (for delivery year 2025/2026).
VRR Curve	Variable Resource Requirement	A downward sloping demand curve used in the conduct and settlement of the BRA, both PJM wide and for individually constrained LDAs, that relates the maximum price for a given level of capacity resource commitments relative to reliability requirements.

All definitions above are sourced from the PJM website and its educational materials, as well the North American Electric Reliability Corporation (NERC).

Energy Affordability in Washington, DC

Tracking and Enhancing Energy Affordability for District Residents

Prepared for the Office of the People's Counsel for the District of Columbia

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CONTENTS

EXECUTIVE SUMMARY

Energy affordability is a critical problem for many residents of Washington, DC. A 2021 study showed that low-income households with income at or below 60 percent State Median Income (SMI) in the DC metro area faced a 4.5 times greater energy burden than for comparable non-low-income groups, spending 7.7 percent of their household income on energy bills. Energy burdens vary widely by census tract, ranging from less than 2 percent to more than 10 percent.

The implications of high energy burdens are dire: facing high energy bills, low-income customers may forgo energy use to pay for other household essentials. If they are unable to pay utility bills, they may fall into arrears and even face service shutoffs, which can have serious health and other impacts.

The District can take several steps to address growing concerns about energy affordability. Most notably, it can (a) look to develop an affordability framework that allows for robust assessment of affordability issues and solutions, drawing on examples from different states, and it can (b) enhance its existing portfolio of options to assist customers struggling with energy bills.

Synapse Energy Economics, Inc. (Synapse) found that multiple states are reporting on affordability for low-income and moderate-income customers, although it is unclear how and to what extent they consider affordability in their decision-making processes. California has the most robust framework, with useful metrics and regular reporting, as well as assessment of utility investment proposals. California's approach, a result of extensive stakeholder engagement in a three-phase process, offers more concrete metrics and reporting than those of many other states that may not have adopted any metrics, or rely on energy burden metrics. In this report, we describe several metrics from California's affordability framework and provide examples to illustrate how these metrics can be applied in the District.

Establishing an affordability framework to measure and assess the impact of energy assistance programs and utility discount rates would shed light on how well these programs address utility customers' current hardships. A comprehensive affordability framework would also make it easier to understand the implications for energy affordability of proposed investments and policy changes.

We recommend that the District adopt an affordability framework based on California's approach. To inform the design of the framework, the DC Public Service Commission should open a docket to investigate the affordability concerns of District utility consumers, and subsequently, should consider and adopt an affordability framework modeled on the California framework. This affordability docket should provide an opportunity for stakeholders to provide input on the following:

- The essential level of utility service
- The frequency and contents of periodic reporting, as well as who has responsibility for the reporting and how it should be available to the public
- What actions would trigger an affordability assessment (e.g., proposals for changes in rate structures, new investments, program eligibility), as well as the timing, process, and requirements for consideration of that assessment

Synapse found that the District has well-established energy assistance programs for low- and moderate-income customers. However, funding for some of those programs is under threat—and while DC's programs apply best practices, there are opportunities for improvement. To provide additional perspective, Synapse analyzed affordability practices and programs in Maryland, Massachusetts, and Illinois. All three states are pursuing clean energy and/or decarbonization goals, and all have noteworthy energy assistance and other energy affordability programs. The District should consider adopting changes to affordability programs, including current utility rate structures, to better align with best practices, including adopting measures to expand eligibility or otherwise provide access to program benefits for DC's sizable renter population. Table ES-1 summarizes the report's recommendations.

Table ES-1. Practices in DC and select jurisdictions and recommendations for DC programs

Category	Current DC practice	Practice in other jurisdictions	Recommendations for DC
Funding source	All programs except LIHEAP and WAP are funded by ratepayers	Maryland: Programs other than LIHEAP and WAP are funded by both ratepayers and state funds	Consider alternative funding source(s) to offset risk of federal LIHEAP/WAP funding disruption and diversify funding stream
Program offerings	Shutoff protection is only available for vulnerable populations or during periods of extreme weather	Maryland: Shutoff protection is available to any customers in arrears throughout the heating season (with timely payments under budget billing plan)	Consider extending protections to all customers in arrears within the heating and cooling seasons; if implemented, track data and monitor success of this change in avoiding shutoffs
	Utility discounts exempt customers from certain bill components, but do not account for income	Illinois: Utility discount rates are tiered based on income (percentage-of-income payment plan, or PIPP) Massachusetts: Utility discounts are tiered depending on the participant's income	Consider implementing a PIPP or tiered discount program
	Utility discount is not tailored to achieving specific affordability metrics	Illinois: PIPP ensures participants' energy bills are capped at 6 percent of income Massachusetts: Tiered discount rates will be designed to achieve a particular energy burden level	If a PIPP or tiered discount program is implemented, tie discounts to affordability metrics
Program eligibility	Programs (LIHEAP, RAD, RES) require customers to have utility bills in their name	Maryland: For LIHEAP participants' whose energy costs are included in rent, benefits are paid to the landlord, and rent is reduced accordingly Illinois: LIHEAP participants with utilities included in their rent receive a cash benefit if they verify they do not have an energy bill under their name	Ensure that renters with energy costs included in their rent are eligible for assistance, and/or develop offerings for such renters—for example, multifamily energy efficiency programs that require landlords to agree to share the cost savings with tenants (for master-metered units)

Category	Current DC practice	Practice in other jurisdictions	Recommendations for DC
Enrollment process	Joint application for LIHEAP and utility discount program	Maryland: Joint application for all energy assistance programs (LIHEAP, utility discount, arrearage management), with referral to energy efficiency program	Investigate ways to facilitate applying to all relevant programs, such as by coordinating health and safety upgrades and arrearage management
	Categorically eligible households must still apply for energy assistance (except for WGL's AMP, which automatically enrolls customers approved for other DOEE assistance programs)	Maryland: Automatic enrollment in all energy assistance programs for categorically eligible households Massachusetts: Automatic enrollment in arrearage management program for eligible electric and gas customers	Explore the feasibility of automatic enrollment for categorically eligible households, considering impacts on funding and enrollment process
	No special treatment for vulnerable households	Maryland: Streamlined application process for applicants who are aged 60 or older, disabled, or critically ill Illinois: Priority for vulnerable populations (older adults, individuals with a disability, families with young children, and households disconnected from energy services), priority applicants can apply a month earlier than other applicants	Consider whether vulnerable households should be given priority for services

Report Overview

After a brief summary of energy affordability issues in the DC metro area, the report outlines a potential energy affordability framework for the District (Section 2), based on a review of how other jurisdictions have measured or defined energy affordability or adopted energy affordability metrics, with an in-depth case study of California's approach and proposed metrics to measure energy affordability in DC. Section 3 provides an overview of energy assistance programs for low-income households in DC funded through utilities and by the federal government, as well as existing consumer protections. Section 4 describes the findings of the analysis of energy assistance and other energy affordability programs in Maryland, Illinois, and Massachusetts and identifies best practices that the District may want to consider.

GLOSSARY

affordability framework: a structured approach to organizing, analyzing, and interpreting information to understand affordability.

affordability ratio (AR): the ratio of essential utility service charges to non-disposable household income.

area median income (AMI): The median income in the area, by household size. The geographic area may include, but is not limited to, census tracks, cities, and counties.

arrearage management program (AMP): program that helps customers eliminate outstanding debt through forgiveness plans tied to consistent payment behavior.

deferred payment agreement (DPA): an agreement whereby a utility customer pays a past-due balance in a series of installments over time.

energy affordability metrics: components of the affordability framework that define the information that utilities, regulators, and other stakeholders can use to monitor energy affordability to end-use customers.

energy assistance program: a government or ratepayer-funded initiative that helps makes energy costs more manageable by providing direct payments for utility services or providing financial assistance toward seasonal or year-round energy bills.

energy burden: the percentage of income spent on energy bills

essential level of utility service: the minimum amount of utility service required to live comfortably and safely within a housing unit.

federal poverty level (FPL): The income threshold, based on household size, that determines a household's eligibility for various federal programs.

hours at minimum wage (HM): the number of hours, worked at minimum wage, required to pay for the essential level of utility service.

low-income discount rate (LIDR): a reduced electricity and/or gas rate for income-eligible households. LIDR programs can employ tiered discounts, percentage reductions, or fixed credits.

Low-Income Home Energy Assistance Program (LIHEAP): a program that provides funding to help low-income households pay for heating and cooling energy costs.

master-metered units: housing units that do not have their own electric and/or gas meters. Landlords will include the cost of utilities within their rent.

percentage-of-income-payment plan (PIPP): a plan that caps energy bills at a fixed percentage of household income, typically between 3-6 percent, and provides bill credits to ensure participating customers' bills do not exceed this percentage.

Public Use Microdata Area (PUMA): a U.S. Census Bureau geographic unit with a population of at least 100,000 people, used to provide detailed, anonymized survey data.

Residential Aid Discount (RAD): a program that provides a discount on the distribution portion of a low-income customer's monthly electric bill.

Residential Essential Service (RES): a program that provides a discount on the distribution portion of a low-income customer's monthly gas bill.

state median income (SMI): the median income in the state for a particular household size.

Weatherization Assistance Program (WAP): a program that provides low-income households with technical and financial assistance for energy efficiency to reduce energy bills.

1. INTRODUCTION

Energy affordability is a long-standing problem across the United States and a growing priority for many jurisdictions. High energy bills disproportionately burden low-income customers.[1] Access to affordable energy services is crucial to individual health and well-being, and many households cannot simply forgo energy use when budgets are tight.[2] Furthermore, low-income households are more likely to live in low-quality, energy-inefficient housing that increases their energy consumption and subsequently their energy costs.

High energy burdens (the portion of household income spent on energy costs) can also compound and perpetuate existing economic hardship.[3] On average, energy burden for low-income customers is higher than for non-low-income households. Facing high energy bills, low-income customers may be forced to choose between paying for energy and paying for other household essentials. These same customers are at risk for falling behind on their utility bills, resulting in arrearages and even service shutoffs, which can have serious health and other impacts.[4] The U.S. Energy Information Administration's (EIA) 2020 Residential Energy Consumption Survey (RECS) found that about 33 percent of U.S. households reported experiencing some form of energy insecurity,[5] and about 24 percent reported forgoing other necessities such as food or medicine to pay for energy costs.[6]

[1] Drehobl, A., L. Ross, and R. Ayala. 2020. "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burdens across the U.S." American Council for an Energy-Efficient Economy. https://www.aceee.org/research-report/u2006.

[2] Seidman, N.L., C. James, D. Torre, et al. 2020. "Energy Infrastructure: Sources of Inequities and Policy Solutions for Improving Community Health and Wellbeing." Synapse Energy Economics, Regulatory Assistance Project, and Community Action Partnership. https://www.synapse-energy.com/energy-infrastructure-sources-inequities-and-policy-solutions-improving-community-health-and-0.

[3] Bohr, J. and A.C. McCreery. 2020. "Do Energy Burdens Contribute to Economic Poverty in the United States? A Panel Analysis." *Social Forces* 99 (1): 155–77. doi:10.1093/sf/soz131.

[4] Flaherty, M., S. Carley, and D.M. Konisky. 2020. "Electric Utility Disconnection Policy and Vulnerable Populations." *The Electricity Journal* 33 (10): 106859. doi:10.1016/j.tej.2020.106859.

[5] In the EIA survey, households are defined as having experienced energy insecurity if they reported one of the following: forgoing paying for food or medicine in order to pay an energy bill, keeping the home at an unsafe or unhealthy temperature, receiving a disconnection notice, and being unable to use heating or air conditioning equipment because the equipment was broken and the household could not afford to fix it, the electricity or natural gas supply was disrupted due to nonpayment, or the household could not afford a bulk fuel delivery.

[6] See Table HC11.1, "Household energy insecurity, 2020" (final data release date: August 2025) in: U.S. Energy Information Administration. 2023. "2020 Residential Energy Consumption Survey (RECS)." https://www.eia.gov/consumption/residential/data/2020/.

Communities of color, renters, rural communities, and families in low-income multifamily housing and older buildings experience even greater energy burdens.[7,8] Black and Hispanic households are disproportionately likely to experience energy insecurity and utility service shutoffs, and so are households with small children.[9]

1.1. Energy Affordability in the District of Columbia

Energy insecurity is less common in the District of Columbia than in the nation as a whole: the U.S. Census Bureau's Household Pulse Survey in August–September 2024 found that 11.9 percent of DC respondents said they had been unable to pay an energy bill in full in the preceding year—compared with 23.4 percent of households nationwide.[10]

Yet many low-income households in the District still face severe energy burdens. The 2020 RECS found that 18 percent of DC households reported some form of energy insecurity.[11,12] A study commissioned by the DC Department of Energy and Environment found that households with incomes at or below 60 percent of the state median income (SMI) for the DC metro area faced an energy burden 4.5 times greater than for comparable non-low-income groups.[13] The median energy burden for low-income households was 7.7 percent of income, 4.5 times the median for non-low-income households (1.7 percent).

A look at *average* energy burden data for households at or below 80 percent of the area median income (AMI) shows a similar pattern. The average energy burden for these households is 5.7 percent in Washington, DC.[14] An analysis by census tract also reveals large variations across neighborhoods. As

[7] Lewis, J., D. Hernández, and A.T. Geronimus. 2020. "Energy Efficiency as Energy Justice: Addressing Racial Inequities through Investments in People and Places." *Energy Efficiency* 13 (3): 419–32. doi:10.1007/s12053-019-09820-z.

[8] Drehobl, Ross, and Ayala, 2020, "How High Are Household Energy Burdens? An Assessment of National and Metropolitan Energy Burdens across the U.S."

[9] Memmott, T., S. Carley, M. Graff, and D.M. Konisky. 2021. "Sociodemographic Disparities in Energy Insecurity among Low-Income Households before and during the COVID-19 Pandemic." *Nature Energy* 6 (2): 186–93. doi:10.1038/s41560-020-00763-9.

[10] U.S. Census Bureau. Household Pulse Survey. Available at: https://www.census.gov/data-tools/demo/hhp/#/?s_state=00011&measures=ENERGYBILL.

[11] U.S. Energy Information Administration (EIA). 2023. Highlights for household characteristics of U.S. homes by state, 2020. *Residential Energy Consumption Survey.* Available at: https://www.eia.gov/consumption/residential/data/2020/state/pdf/State%20Household%20Characteristics.pdf.

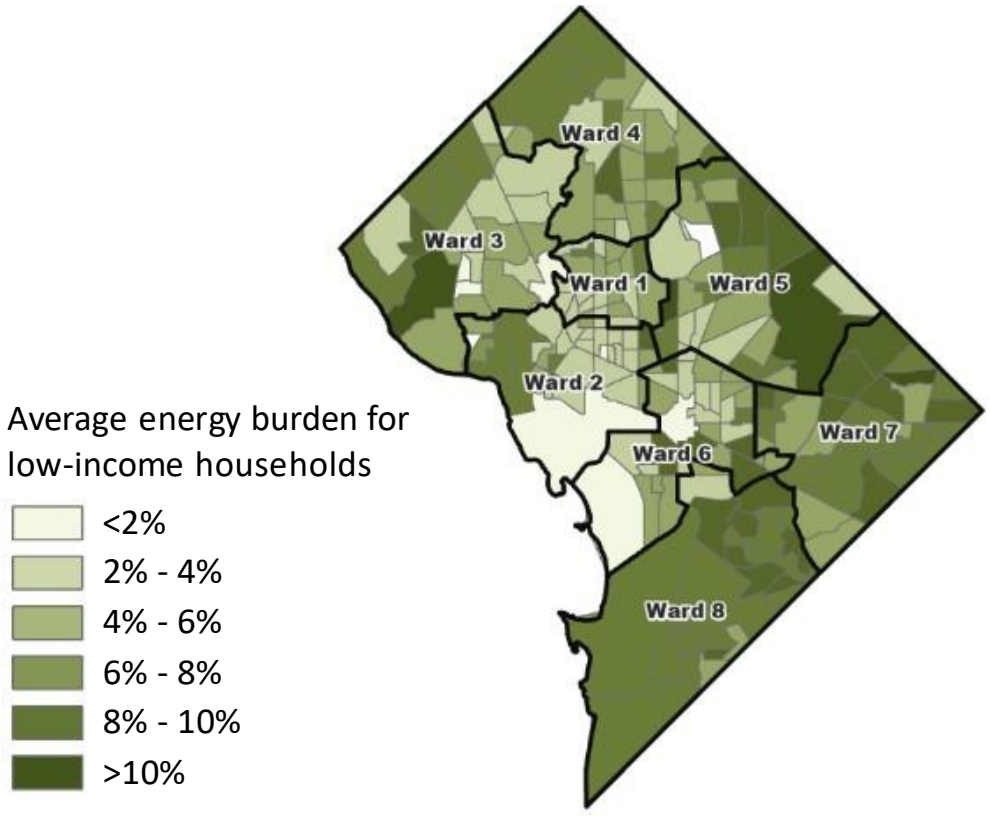
[12] Defined as forgoing food or medicine in order to pay a utility bill, keeping their home at an unsafe or unhealthy temperature, receiving a disconnection notice, or unable to use heating or air conditioning due to affordability barriers

[13] Drehobl, A., D. Hernández, R. Ayala, and L. Ross. 2021. "An Examination of District Residents' Experiences with Utility Burdens and Affordability Programs." Report written for the Department of Energy and Environment of the District of Columbia. Washington, DC: American Council for an Energy-Efficient Economy. 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.

[14] Authors' analysis based on data from: DOE. 2024. "Low-Income Energy Affordability Data (LEAD)." Harvard Dataverse, V2. doi:10.7910/DVN/ZDV0KN. We use the higher threshold of 80 percent of AMI in our analysis because it is the threshold for eligibility for the District's low-income energy assistance programs, as discussed in Section 3.

shown in Figure 1, average energy burden for low-income households varies geographically throughout the District. Wards 7 and 8 have the highest average energy burden for households at or below 80 percent of AMI—roughly 7 percent.

Figure 1. Average energy burden for low-income households by census tract in DC



Source: DOE. 2024. "Low-Income Energy Affordability Data (LEAD)." Harvard Dataverse, V2. doi:10.7910/DVN/ZDV0KN.

2. ENERGY AFFORDABILITY FRAMEWORK FOR THE DISTRICT

A framework is a structured approach to organizing, analyzing, and interpreting information to understand a specific problem or phenomenon—in this case, energy affordability. Underpinning the framework for energy affordability are metrics that regulators, utility companies, consumer advocates, and other stakeholders can use to monitor energy affordability and the effectiveness of any efforts to address it. This section presents a framework for assessing energy affordability in the District, largely following California's approach.

This report does not recommend that the District adopt a specific energy affordability definition or framework that combines disparate metrics into a single "index" or "score," for several reasons:

- The potential for double counting of impacts if multiple related metrics are combined into a single score
- Lack of transparency
- Potential to obscure underlying impacts

Indeed, none of the jurisdictions reviewed by Synapse use a comprehensive, multi-attribute "affordability index" that combines multiple metrics into a single number. Instead, many jurisdictions use one metric, or a set of distinct metrics or indicators, to assess energy affordability and vulnerability. As discussed in detail in section 2.2, California's framework relies on two discrete but compatible metrics: Hours at Minimum wage (HM) and the Affordability Ratio (AR), each of which analyze a unique facet of energy affordability. This report recommends an affordability framework that applies the HM and AR metrics. We recommend these metrics to be considered by the Public Service Commission (PSC) of the District of Columbia in an affordability proceeding and then subsequently utilized to assess impacts to energy affordability in various regulatory proceedings and/or other dockets considering utility proposals.

California is a much larger and more complex jurisdiction than DC, with multiple climate zones, both urban and rural regions, and many different gas and electric utilities. In contrast, DC is geographically small, with a single climate zone, only one gas utility (Washington Gas Light, or WGL), and one electric utility (Pepco). Despite these differences, the framework and metrics adopted by the California Public Utilities Commission (PUC) are broadly applicable in different jurisdictions. Moreover, California's extensive stakeholder process and ongoing reporting make its approach one of the most robust in the country, offering DC a tested template for systematically tracking and addressing energy affordability.

These metrics are particularly useful because they reflect not only utility rates and energy use, but also local income levels, minimum wage, and housing costs. At a high level, these metrics aim to assess the affordability of energy services by contextualizing household energy costs in terms of what the lowest-income households experience. These metrics have key advantages over other commonly used metrics, such as energy burden, arrearages, and disconnections. California's HM and AR metrics incorporate the broader economic context (e.g., minimum wage levels and housing costs, respectively). The HM and AR metrics are flexible and can apply to many contexts: they can be tracked and compared, to understand shifts in affordability over time, or can be utilized to estimate the projected impacts of a future proposed utility revenue increase on low-income households.

2.1. Review of Energy Affordability Metrics and Frameworks in Other Jurisdictions

The Office of the People's Counsel for the District of Columbia (OPC) serves as the statutory consumer advocate for District ratepayers,[15] and has long advocated for energy affordability.[16] OPC engaged Synapse to evaluate energy affordability in the District, survey best practices in other jurisdictions, and develop a mechanism for use before the District's PSC to measure impacts to energy affordability moving forward.

To inform our recommendations for the OPC, we reviewed literature on metrics and definitions used by several leading states. Generally, we find that the approaches can be grouped in the following ways, described further below: energy burden; arrearages and disconnections reporting; and a more expansive and custom affordability framework (as adopted in California).

Energy burden

Many states define energy affordability in terms of households' energy burden—that is, the share of household income spent on energy bills. For example, the Massachusetts' Department of Public Utilities in 2022 directed the state's investor-owned electric utilities to include an energy burden analysis of residential electric bills.[17] In their reports,[18] the utilities were required to estimate the energy burden by county, at the census block group level, for households at the median household income; the statewide median income, and 50, 100, and 200 percent of the federal poverty level.[19]

Currently, many jurisdictions rely on an energy burden threshold of 6 percent. The public utility commissions of New York,[20] Illinois,[21] and New Jersey[22] have defined unaffordable energy bills as those that exceed a 6 percent energy burden, in line with the *Home Energy Affordability Gap* analysis published in 2003 by Fisher, Sheehan & Colton and updated in 2013.[23] It is based on the assumption that

[15] D.C. Code § 34-804. Available at: https://code.dccouncil.gov/us/dc/council/code/sections/34-804.

[16] See DC Office of the People's Council. 2020. "OPC Releases Findings of Energy Affordability Study," https://opc-dc.gov/opc-releases-findings-of-energy-affordability-study/.

[17] Massachusetts Department of Public Utilities. *Memorandum Re: Annual Returns to Include Utility Burden Index Analysis*. February 9, 2023. Available at: https://www.mass.gov/doc/dpu-annual-returns-memo-to-edcs-february-9-2023/download.

[18] Reports for all utilities can be found at: https://www.mass.gov/info-details/find-an-electric-company-annual-return.

[19] For example, see Eversource Household Economic Burden Index Analysis, 2022: https://www.mass.gov/doc/2022-nstar-ebr/download.

[20] New York Public Service Commission. Case 14-M-0565, Order Adopting Low Income Program Modifications and Directing Utility Filings (May 20, 2016).

[21] Illinois Commerce Commission. 2022. *Low-Income Discount Rate Study Report to the Illinois General Assembly*. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf.

[22] Brattle. 2024. *An Assessment of Energy Affordability in New Jersey and Alternative Policy and Rate Options*. Prepared for the New Jersey Board of Public Utilities. Available at: https://www.nj.gov/bpu/newsroom/2025/approved/20250320a.html.

[23] See Fisher, Sheehan, and Colton. 2003. "Home Energy Affordability Gap." Available at: http://www.homeenergyaffordabilitygap.com/01_whatIsHEAG2.html#.

(a) housing costs must be under 30 percent of gross income to be affordable, and (b) no more than 20 percent of housing costs should be allocated to energy bills.[24] As explained in a 2005 *LIHEAP Energy Burden Evaluation Study* by the Applied Public Policy Research Institute for Study and Evaluation (APPRISE) the 6 percent figure is calculated by taking the product of the affordable threshold for percent income spent on shelter and the median percent of shelter costs that was spent on residential energy costs for low-income households.[25] In 2005, the median energy cost of low-income households in the United States was about 20 percent of shelter costs.[26]

While energy burden is commonly used and referenced in many jurisdictions, it does not account for non-discretionary household costs besides energy—including the sharp rise in housing costs in recent years. Furthermore, there has been little work since this study to update these underlying assumptions, and they may now be out of date. Because of this, some states, such as California, have moved away from that simple energy burden metric and developed their own approaches.[27]

Arrearages and disconnections

Another common way in which state utility commissions monitor energy affordability issues is by directing regulated utilities to collect disconnection and arrearage data. Tracking such data allows for better decision-making on bill payment options, affordability programs, and other potential consumer protections or assistance program options.[28] Several states began tracking and reporting these data for the first time during the COVID-19 pandemic, due to the economic challenges many utility customers were facing.[29]

[24] ACEEE. Understanding Energy Affordability. Available at: https://www.aceee.org/sites/default/files/energy-affordability.pdf.

[25] APPRISE. 2005. "LIHEAP Energy Burden Evaluation Study." Prepared for the Division of Energy Assistance, Office of Community Services Administration for Children and Families, U.S. Department of Health and Human Services. https://acf.gov/sites/default/files/documents/ocs/comm_liheap_energyburdenstudy_apprise.pdf.

[26] Ibid.

[27] CPUC. 2022. "Decision Implementing the Affordability Metrics." Rulemaking 18-07-006, Decision 22-08-023. https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=496428621.

[28] National Governors Association. 2021. "Memorandum on State Utility Disconnection Moratoriums and Utility Affordability." https://www.nga.org/publications/memorandum-on-state-utility-disconnection-moratoriums-and-utility-affordability/.

[29] Curry, W. 2023. "State Energy Justice Roundtable Series: Customer Affordability and Arrearages." Washington, DC: National Association of Regulatory Utility Commissioners. https://pubs.naruc.org/pub/2B1596E2-1866-DAAC-99FB-37A81B4AFEF7.

Some of the states that require tracking of customer arrearage and disconnection data include, but are not limited to, the following: California,[30] Rhode Island,[31] Maryland, [32] Illinois,[33] Minnesota,[34] and Washington.[35] Almost all of these states require monthly reporting of this data. Other states required utilities to report this information during the COVID-19 pandemic and may continue to require such reporting.[36] While the specific data requirements vary by jurisdiction, they often include the following:

- Number of disconnection notices
- Number of disconnections
- Number of reconnections
- Number of customers with arrearages
- Dollar value of arrearages

Some states require more extensive reporting on arrearages and disconnections. For example, Rhode Island requires reporting on the following metrics and more:[37]

- Number of delinquent accounts with oldest arrears aged 30–59, 60–89, and 90+ days after issuance of a bill, broken out by those with a payment assistance program and those without
- Dollar value of delinquent accounts with oldest arrears aged 30–59, 60–89 and 90+ days after issuance of a bill, broken out by those with a payment assistance program and those without
- Cases referred for collection

[30] CPUC. 2022. "Energy Utility Arrearages: Rulemaking 21-02-014 to Address Energy Utility Customer Bill Debt Accumulated During the COVID-19 Pandemic." https://www.cpuc.ca.gov/consumer-support/consumer-programs-and-services/electrical-energy-and-energy-efficiency/energy-utility-arrearages.

[31] Rhode Island Public Utilities Commission & Division of Public Utilities and Carriers, Docket 4770. Low Income Monthly Reports, available at https://ripuc.ri.gov/eventsactions/docket/4770-LIMRepts.html.

[32] See monthly reports for Maryland at https://webapp.psc.state.md.us/newIntranet/test/Viewreport.cfm.

[33] Illinois Commerce Commission. "Credit, Collections, and Arrearages Reports Monthly Dashboard." Available at: https://www.icc.illinois.gov/industry-reports/credit-collections-and-arrearages-reports/monthly-dashboard.

[34] Filings can be found on the Minnesota Public Utilities Commission eDockets page by searching for YEAR-02 (e.g., 2022 reports are in docket "22-02") at https://www.edockets.state.mn.us/documents.

[35] See Washington Utilities and Transportation Commission Docket U-200281, available at https://www.utc.wa.gov/casedocket/2020/200281/docsets.

[36] Ryan, G. 2021. "Despite Transparency Failures, Utility Information Reveals Major Home Shutoff Problem." Center for Biological Diversity. https://www.biologicaldiversity.org/programs/energy-justice/pdfs/Power-Crisis-Report-June-2021.pdf..

[37] Rhode Island Public Utilities Commission & Division of Public Utilities and Carriers, Docket 4770. Low Income Monthly Reports, available at https://ripuc.ri.gov/eventsactions/docket/4770-LIMRepts.html.

- Number of service disconnections for nonpayment, broken out by those accounts with special protections and those without
- Number of service restorations within seven days of termination, broken out by those accounts with special protections and those without
- Number and dollar value of accounts classified as written off
- Accounts receiving a low-income discount rate
- Demographic characteristics of residential accounts, including elderly, infant, handicapped, welfare, unemployed, and seriously ill

Some states, such as Illinois, Minnesota, and California, require regulated utilities to report disconnection and arrearage data by ZIP code. Minnesota utilities report the number of disconnection events by ZIP code biannually.[38] In addition to the framework described in the following section, California publishes disconnection and arrearage data by ZIP code on an online map alongside information about local community-based organizations who may be able to help customers with arrearages.[39] Granular geographic reporting within a utility's service territory allows regulators and stakeholders to see which communities are most burdened by disconnections.

In the District of Columbia, the Potomac Electric Power Company (Pepco) and Washington Gas Light Company (WGL) provide monthly arrearage and disconnection reports to the PSC.[40] Pepco and WGL report each metric separately for total residential customers (including low-income and non-low income) and low-income customers specifically. Low-income customers in this instance are defined as those customers enrolled in utility discount programs, which are Pepco's Residential Aid Discount (RAD) and WGL's Residential Essential Service (RES).[41] This means the data reporting does not include all customers who may qualify as low-income, but only those low-income customers who have already enrolled in RAD or RES.

Tracking arrearages and disconnection metrics is helpful for understanding the scale of current affordability concerns in the District, and it is important to track, report, and monitor these metrics and statistics over time. However, not all customers who experience disconnections and arrearages are low-

[38] See template of required data on the Minnesota Public Utilities Commission website at https://mn.gov/puc/activities/utility-reporting/energy/.

[39] See the CPUC's Community Based Organization (CBO) Case Management program dashboard at https://hdr.maps.arcgis.com/apps/dashboards/5bab8b0068914649866d670fcd69e465.

[40] The monthly Arrearage and Disconnection reports (ARDIR) are available at https://edocket.dcpsc.org/public/search/casenumber/ardir.

[41] District of Columbia Public Service Commission. FC 1043 and FC 813. Order 15134. December 9, 2008: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=71893&guidFileName=d5e86a4c-a994-4283-a982-479d9f45ab33.pdf.

income households.[42] These metrics are also ill-suited to support a forward-looking assessment of future affordability, as changes in arrearages or disconnections are difficult to forecast based on an expected rate or bill impact, e.g. resulting from a utility investment. More adaptable and novel metrics may better support an affordability framework.

California's affordability framework

In 2018, recognizing that consumers need affordable utility services, the California Public Utilities Commission (CPUC) opened an Affordability Rulemaking.[43] The CPUC defined affordability in this context as "the degree to which a representative household is able to pay for an essential utility service, given its socioeconomic status."[44] Within the Affordability Rulemaking, California defined its affordability framework to include "affordability metrics, presented and analyzed in an Affordability Report, an Affordability Ratio Calculator containing the formulas and inputs/ outputs of the Affordability Ratio for stakeholders to generate their own variations; and a set of maps showing the metrics geographically."[45] The three affordability metrics, which were informed by peer-reviewed research, are:[46]

- Hours at minimum wage: The number of hours, worked at minimum wage, required to pay for the essential level of utility service
- Affordability Ratio: The ratio of essential utility service charges to non-disposable household income (similar to energy burden)
- The CalEnviroScreen metric: A score for each census tract in California that identifies which communities are most negatively affected by increases in essential service charges, based on 21 population characteristics and the pollution burden of each census tract

When assessing the affordability of essential utility services in the Affordability Rulemaking, California considers each of the three metrics independently. In its decision adopting the metrics, the Commission noted that "the use of three independent, but related, metrics will create a more complete picture of affordability than any one metric on its own" (p. 11).[47] Rather than seeking to define energy affordability

[42] Hernández, D. and J. Laird. 2022. "Surviving a Shut-Off: U.S. Households at Greatest Risk of Utility Disconnections and How They Cope." *American Behavioral Scientist* 66 (7): 856–80. doi:10.1177/00027642211013401.

[43] The full set of documents for the Affordability Rulemaking can be found at https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability.

[44] CPUC. "Decision Adopting Metrics and Methodologies for Assessing the Relative Affordability of Utility Service." Rulemaking 18-07-006. D.20-07-032. July 22, 2020. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K049/344049206.PDF.

[45] CPUC. 2023. "Administrative Law Judges Ruling Noticing Related Proceedings of Comments Sought." Rulemaking 18-07-006. December 14, 2023. https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M521/K449/521449073.PDF

[46] Based on Teodoro, Manual P. 2018. "Measuring Household Affordability for Water and Sewer Utilities." https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/energy-division/documents/affordability-proceeding/phase-1/manuel-p-teodoro-affordability-methodology.pdf

[47] CPUC. 2020. "Decision Adopting Metrics and Methodologies for Assessing the Relative Affordability of Utility Service."

"in absolute terms," the Commission added, "the objective of this decision is to define metrics and methodologies to track relative affordability of essential utility services over time, and to set out a path of future implementation of those metrics and methodologies" (p. 81).

As a result, California's affordability framework consists of these metrics, a set of maps presenting the results geographically, an Affordability Ratio calculator, utility quarterly revenue reports, and annual affordability reports.[48]

As a part of the rulemaking, the Commission sought feedback on the use and implementation of the affordability framework in various proceedings, asking parties to consider the following questions:[49]

- Does the affordability framework:
    - Make utility rates and bills meaningful or useful for the type of decision being made?
    - Make utility rates and bills representative for types of customers based on where they live and their costs of living?
    - Help describe the choices before the Commission as more or less affordable?
    - Advance the Commission's environmental and social justice goals?
- How have non-utility parties utilized the affordability framework to inform their participation and/or develop their positions? If they have not used the framework, was it due to difficulty understanding the affordability tools/metrics, difficulty incorporating the tools/metrics into parties' positions, or some other reason?

We recommend that the District's PSC adopt a framework based on California's, as it is the most robust affordability framework from our review and was developed with extensive stakeholder input. The next section discusses the two key metrics recommended for the DC framework: hours at minimum wage (HM) and the Affordability Ratio (AR). The PSC should open a docket to investigate the affordability concerns of District utility consumers and, subsequently, should consider and adopt an affordability framework modeled on the California framework. This affordability docket should provide an opportunity for stakeholders to provide input on the following:

- The essential level of utility service
- The frequency and contents of periodic reporting, as well as who has responsibility for the reporting and how it should be available to the public

[48] CPUC. "Administrative Law Judges Ruling Noticing Related Proceedings of Comments Sought." Rulemaking 18-07-006. December 14, 2023. https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M521/K449/521449073.PDF.

[49] CPUC. "Order Instituting Rulemaking to Establish a Framework and Processes for Assessing the Affordability of Utility Service." December 13, 2023. Rulemaking 18-07-006. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M218/K186/218186836.PDF

- What actions would trigger an affordability assessment (e.g., proposals for changes in rate structures, new investments, program eligibility), as well as the timing, process, and requirements for consideration of that assessment

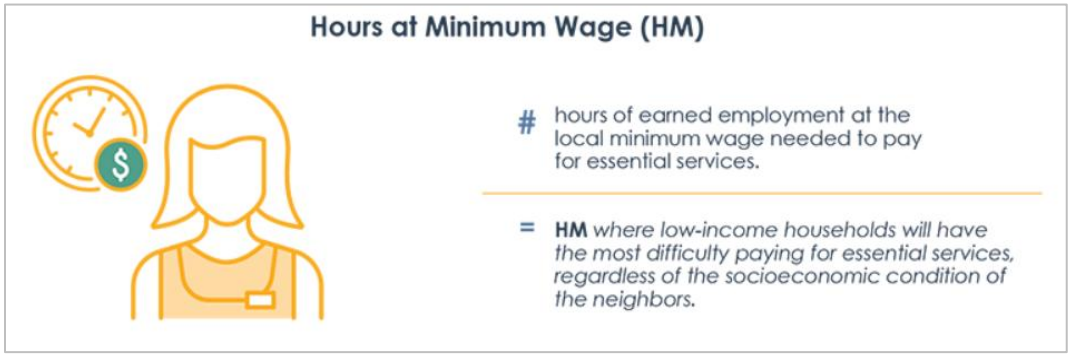
2.2. A Framework for Assessing Energy Affordability in DC

Below we describe in detail the two metrics we recommend for analysis in DC, based on California's adopted affordability metrics.[50] The AR and HM are the most useful individual metrics for energy affordability that we have encountered in our research. Below we provide a definition and a description for each, discuss their advantages and limitations, provide our reasoning for inclusion in an affordability framework for DC, and detail the calculations of each metric, with initial interpretations for the District.

Hours at minimum wage

The HM metric is the number of hours that a customer of a specific utility must work at minimum wage to pay for the essential level of service from their utility. It is calculated simply by dividing the essential utility service charge (discussed below) by the minimum wage within each utility service territory, enabling the assessment of past and present energy affordability using a single value (Figure 2).

Figure 2. Description of hours at minimum wage metric



Source: California Public Utilities Commission. "Affordability Rulemaking." https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability.

Because the HM metric is calculated using minimum wage, it implicitly considers the lowest-income households. However, a limitation of this metric is that it only considers a customer's income, not the other costs that the household may need to cover with that income that might make energy less

[50] The CalEnviroScreen metric relies on CalEPA's CalEnviroScreen Tool, which was developed outside of California's affordability proceedings. DC has not developed a similar cumulative impact mapping tool of its own. If, in the future, a similar tool is developed for the District, it could be used to identify areas of concern for applying the AR and HM metrics, rather than calculating these metrics for all areas.

affordable to individual households—including non-discretionary expenses such as food, prescription drugs, and housing costs. It also does not consider wealth.

The concept of "essential" utility service is at the core of California's definition of affordability ("the degree to which a representative household is able to pay for an essential utility service, given its socioeconomic status").[51] It is defined as "the costs borne by a representative household for the quantity of utility services that enables health, safety, and full participation in society" and allows for comparisons of customer bills, rather than rates, to assess affordability.[52]

California Public Utilities Code 739(a) defines essential ("baseline") levels of electric consumption as 50–60 percent of average usage, and essential levels of all-electric (including heat) and gas consumption as 60 to 70 percent of average usage during the winter heating season, and instructed the CPUC to update these baseline levels as needed.[53] The Commission directed the regulated utilities to conduct an essential usage study to inform metric calculations. [54]

The study, published in 2023, found that baseline usage varies across utility service territories, which differ in climate, and thus in residential consumption levels.[55] The District of Columbia has not defined essential levels of consumption for electric, all-electric, and gas service for residential customers. [56] Until the District defines essential levels of consumption, we recommend using the full average monthly usage for residential consumers in the District. Then, using the same methodology in the California framework, the monthly bill can then be determined for the average residential usage for both electric and gas utility services.

As further illustrated in Appendix A, and as described further below, Synapse has provided an example of how this metric would work in DC. To determine HM values for DC, we used data provided by the

[51] California PUC decision 20-07-032.

[52] CPUC. 2020. "Decision Adopting Metrics and Methodologies for Assessing the Relative Affordability of Utility Service." Decision 20-07-032.

[53] California defines essential levels of consumption, or "baseline quantity" in California Public Utilities Code 739(a): https://california.public.law/codes/public_utilities_code_section_739

[54] DNV. 2023. "Essential Use of Electricity Study." Prepared for Southern California Edison, Pacific Gas and Electric Company, and San Diego Gas & Electric Company. https://pda.energydataweb.com/api/view/2796/Essential%20Use%20of%20Electricity%20Study%20Final%20Report%20with%20Web%20Tool%20User%20Guide%2003-31-2023.pdf.

[55] DNV. 2023. "Essential Use of Electricity Study." Prepared for Southern California Edison, Pacific Gas and Electric Company, and San Diego Gas & Electric Company. https://pda.energydataweb.com/api/view/2796/Essential%20Use%20of%20Electricity%20Study%20Final%20Report%20with%20Web%20Tool%20User%20Guide%2003-31-2023.pdf.

[56] We recommend focusing on electric, all-electric, and gas utility bills when assessing energy affordability. All-electric utility bills are of customers who use electricity for heating, rather than gas or other fuels.

PSC[57] and U.S. EIA.[58] In June 2025, the minimum wage in the District was $17.50 per hour.[59] For the electric utility HM calculation, at the June 2025 minimum wage and utility service rates, a customer would need to work seven hours at minimum wage to pay for the average monthly level of electric utility service. For the gas utility service HM calculation, using April 2025 rates and the average level of gas utility service during the winter heating season, a customer would need to work 10 hours at minimum wage. Appendix A provides details on the methodology and calculations.

Example: Applying the HM metric

The HM metric can contextualize an expected change in rates or bills from a proposed rate increase, investment, program, or policy change. To illustrate, we developed two examples of how the HM metric could be applied.

Our first example shows how the HM metric can reflect the impact of participating in the low-income discount rates program offered by Pepco. The Residential Aid Discount is an income-eligible, utility discount rate. It exempts low-income customers from several distribution surcharges as well as the full distribution customer charge and energy charges. [60]

By accounting for differences in the monthly bills of RAD participants vs. ineligible customers, the HM metric automatically considers the affordability of electric service for the lowest-income customers. As shown in Table 1, a residential customer not participating in RAD must work 7.8 hours at the $17.50 minimum wage to pay for average monthly summer electricity costs, and 7.1 hours for average winter electricity costs. However, due to the reduced bills, a RAD customer would only need 5.6 hours at minimum wage per month to pay for the average monthly summer electricity bill and 5.2 hours for the average winter electricity bill.

Table 1. Comparison of electric HM metric for non-participant and participant in RAD program

Scenario	Residential customer		Residential customer participating in RAD	
Season	Summer	Winter	Summer	Winter
Hours at minimum wage/month	7.8	7.1	5.6	5.2

[57] The DCPSC provides a monthly Electric Bill Calculator for the PEPCO Standard Offer Service at https://dcpsc.org/Retail-Choice/How-to-Choose/How-to-Choose-an-Electric-Supplier/Electric-Bill-Calculators.aspx and a monthly Washington Gas Light Natural Gas Bill Calculator at https://dcpsc.org/Retail-Choice/How-to-Choose/Natural-Gas/Monthly-Washington-Gas-Light-Natural-Gas-Bill-Calc.aspx. The DC PSC also provides historical monthly PEPCO residential electric usage and customer count at https://dcpsc.org/Utility-Information/Electric/Historical-and-Analytical-Information-for-Electric.aspx.

[58] The average DC residential gas consumption and customer count can be found at https://www.eia.gov/dnav/ng/hist/n3010dc2m.htm and https://www.eia.gov/dnav/ng/hist/na1501_sdc_8a.htm.

[59] District of Columbia Department of Employment Services. 2025 Notice of Living Wage Increase. https://does.dc.gov/sites/default/files/dc/sites/does/publication/attachments/Final%202025%20Notice%20of%20Living%20Wage%20Increase%20to%20Employers%202.6.2025.pdf

[60] Pepco. 2025. "Rate Schedules for Electric Service in the District of Columbia." Washington, DC: Potomac Electric Power Company. Available for May 2025 at https://www.pepco.com/cdn/assets/v3/assets/bltbb7c204688a1a6a8/blt1592c0ff5185f738/6838a59f7476148e7ae7d25a/DC_PCA_SOS_Current_Tariff_Eff_6.1.2025.pdf?branch=prod_alias.

Our second example illustrates how the HM metric can contextualize changes in rates, whether on the distribution side or supply side. In this case, we look at the impact of the recent PJM capacity market price surge. In the Washington, DC, region, capacity prices for the PJM subregion increased by a factor of five between the 2024/2025 and 2025/2026 delivery years. This is due to a few key factors, including decreases in existing supply, entry barriers for new supply, and a sharp rise in projected demand.[61]

We calculated the HM metric using generation rates before and after the increase in capacity prices.[62] Prior to the increase in generation rates, holding all else equal, a residential customer would have had to work 6.6 hours per month to pay for the average summer electricity bill and 6 hours per month for the average winter electricity bill (Table 2). The current rates, requiring 7.8 and 7.1 hours, represent a 19 and 17 percent increase in hours to pay for summer and winter electricity, respectively.

Table 2. Comparison of electric HM metric before and after PJM capacity price increase

Scenario	Residential customer, 2024/2025 delivery years		Residential customer, 2025/2026 delivery years	
Season	Summer	Winter	Summer	Winter
Hours at minimum wage/month	6.6	6.0	7.8	7.1

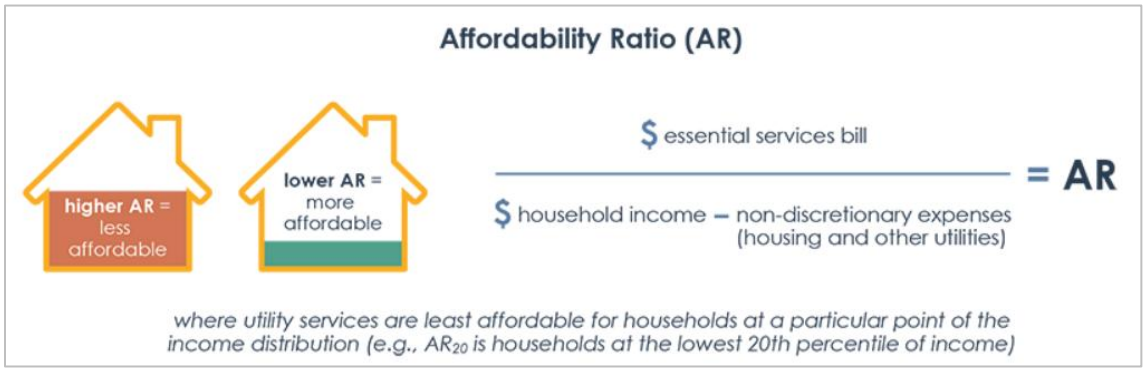
Affordability Ratio

The Affordability Ratio (AR) metric measures the affordability of an essential utility service while taking non-discretionary costs into account. As shown in Figure 3, the AR is calculated by dividing the monthly residential utility bill at the essential level of consumption by the difference between a household's monthly income and its monthly housing costs. California determines the affordability ratio at the 20th and 50th income percentiles, AR20 and AR50. California defines non-discretionary costs as housing costs, which include the cost of rent or the cost of mortgage payments and real estate taxes.

[61] For more information, see Shenstone-Harris, S., C. Mattioda, A. Fuzaylov, W. Dejeanlouis, B. Fagan. 2025. "Drivers of PJM's Capacity Market Price Surge and its Impacts on Electricity Consumers in the District of Columbia." Synapse Energy Economics for the Office of the People's Counsel for the District of Columbia. https://opc-dc.gov/wp-content/uploads/2025/05/PJM-Capacity-Market-Report-FINAL-OPC-Synapse.pdf.

[62] Generation rates for the 2024/2025 case are from: Pepco. 2025. "District of Columbia Residential Service. Schedule R1." Updated May 14, 2025. https://www.pepco.com/cdn/assets/v3/assets/bltbb7c204688a1a6a8/bltbdd840dce622cf3c/6838a8bb518ed962fec89624/DC_Rates_Update_05.14.25_R_1.pdf?branch=prod_alias.

Figure 3. Description of Affordability Ratio metric



Source: California Public Utilities Commission. "Affordability Rulemaking." https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/affordability.

The Affordability Ratio differs from the HM metric in that it takes into account non-discretionary costs (such as housing costs). In effect, the affordability ratio is the percentage of a household's available budget that is spent on essential utility service. AR also considers customers who have low or moderate amounts of economic resources relative to their geographic area, not just the lowest-income customers.

Income levels and non-discretionary costs vary across the District, so determining the AR for different areas will provide more granular insights into affordability than the HM metric, which is based on jurisdiction-wide minimum wage rates. The AR can also be calculated specifically for disadvantaged communities or for the most vulnerable communities in the District. California requires the AR to be calculated for the state's Areas of Affordability Concern, which are "pockets of the state where lower-income Californians spend much more of their available budget than the vast majority of Californians on essential utility service."[63] By tracking AR over time and during utility investment and rate cases, California can determine how rate increases will affect the communities that already faced the greatest affordability concerns.

Annual income, monthly rental payments, monthly mortgage payments, monthly real estate tax payments, and many other data points are available from the U.S. Census Bureau's Public Use Microdata Sample (PUMS).[64] PUMS data are provided at the Public Use Microdata Area (PUMA) geographic level. The District has six PUMAs for which the AR metric may be calculated and forecast.[65]

Using data from PUMS, we calculated that in 2023, the 20th percentile household income in the District was $39,000, and the 50th percentile income was $105,700. To determine the housing costs of a household at each income level, we took the average housing costs (i.e., rent or mortgage payment and

[63] CPUC. 2020. "Decision Adopting Metrics and Methodologies for Assessing the Relative Affordability of Utility Service." R.18-07-006, D.20-07-032

[64] U.S. Census Bureau. 2023. "American Community Survey 1-Year Estimates: Public Use Microdata Sample." https://www.census.gov/programs-surveys/acs/microdata/access.html. [Accessed on April 11, 2025.]

[65] The six PUMAs in the District of Columbia are 101, 102, 103, 104, 105, and 105. See Appendix B for a map of Ward and PUMA boundaries.

property tax) at plus or minus one percentile of the respective income level. For example, for the 20th percentile, we averaged housing costs for households with incomes in the range of $35,000–$41,000. We found that the average housing costs for the 20th and 50th percentile income households were $1,499 and $2,242 per month, respectively. To determine the final AR20 and AR50 values for electric and gas service, we divided the average monthly bill for each service by the income reduced by housing costs.[66] Table 3 shows the AR20 and AR50 for the different energy utility services for the average residential energy consumption for District customers.

Table 3. Affordability Ratio metric for the residential customers in the District of Columbia, June 2025

	Electric customer, summer	Electric customer, winter	Gas customer, heating season
AR20 (20th percentile income customer)	7.8%	7.0%	10.5%
AR50 (50th percentile income customer)	2.1%	1.9%	2.8%

The AR metric is the percent of monthly household income (less housing costs) spent on utility bills (see description above).

Our example AR20 and AR50 calculation uses the utility service rates from June 2025 and the latest available data on income and housing costs in the District. We find that households in the lowest income quintile in the District spend 7–8 percent of their non-discretionary income on electricity, and 10.5 percent of their non-discretionary income on gas during the heating season. For a rough point of comparison, the AR20 for non-income qualified households within the Southern California Edison Company service area ranged from 7.5 to 13.1 percent in 2023, depending on the climate zone.[67]

The AR metric can be used to view the directional impact of a utility investment on affordability (i.e., will it make the utility service more or less affordable?) and the magnitude of the impact (i.e., by how much, compared to without the investment, will utility service be impacted?). Because the AR is an emerging metric and because it will vary by region, over time, by utility, and by service type, there is not a standard value accepted as an affordability threshold. If the District adopts this metric, actual AR results should be tracked to serve as a baseline to provide readers with more context for future values.

2.3. Adopting and Implementing an Affordability Framework

This report provides a starting point for an affordability framework for the District, modeled on California's approach. As noted above, robust stakeholder engagement and input are crucial; the questions asked by the CPUC in California may provide a useful starting point (see section 2.1). The

[66] For illustrative purposes, we use the average amount of energy across all customers in the District in this calculation. In reality, energy consumption varies with income, so the lowest-income customers are unlikely to consume the average amount.

[67] Southern California Edison Company. 2023. "Test Year 2025 General Rate Case Application of Southern California Edison Company (U 338-E)." https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M508/K571/508571137.PDF.

many topics other states have wrestled with provide insight into what DC will need to consider as it implements an affordability framework. This includes broader implementation questions, such as in what contexts or dockets to report and consider these metrics; how and where to track them over time; and how the Commission should take them into account when making decisions. The District will also need to address several quantitative or methodological details and decisions (e.g., how to calculate each metric and what affordability thresholds to set).

The HM and AR metrics are a key part of this affordability framework, which seeks to shed light on the affordability implications of current and future utility rates and to provide context for a variety of decisions before the Commission. The District can apply the HM and AR metrics in multiple ways:

- **Rate cases:** Utilities present metrics in a standard reporting template in rate case dockets or wherever there is a filing for a revenue change, including presentation of metrics before and after the proposed impact.

- **Affordability dockets**: Utilities could report on metrics quarterly or annually in a dedicated docket, such as how Pepco and WGL report disconnections and arrearage data in the "ARDIR" dockets.

- **Standard reports and dashboards:** A standard reporting template or "scorecard" presentation could enhance transparency and standardize comparisons between utilities and across reporting years. While more technically complex to implement, online dashboards could aid in public transparency.

The remaining part of this section delves deeper into key quantitative details and decisions to be made related to the implementation of the HM and AR metrics.

Essential level of utility service

As noted above, California uses an "essential" level of energy service in its metrics rather than average energy consumption. The District should determine the essential levels of service separately for its electric (for both all-electric and gas heating) and gas customers. The examples presented above use average levels of utility service because DC has not defined essential levels of utility service as in California. Thus, these examples may be overestimating or underestimating lower-income households' actual monthly utility bills. Furthermore, because of various constraints, we cannot determine the average monthly utility bills of 20th and 50th percentile income customers, although different income-level customers likely consume different amounts of electricity and gas within their income level. Because the essential level of utility service does not change with income, it would make the AR20 and AR50 calculations simpler and more comparable.

In California, the PUC directed Pacific Gas & Electric Company (PG&E), the state's largest electric utility, "to develop a study plan for developing a model of what constitutes essential use for its residential customers" for residential customers in different climate zones and for both the summer and winter

season.[68] PG&E was also directed to consult with parties in the proceeding that expressed interest, while developing the study plan. As with many of our recommendations, we suggest that DC defines essential levels of utility service through an open process involving stakeholder input.

To refine the essential level of energy service, and subsequently the HM and AR metrics, DC may consider conducting a study to determine which elements, such as the age of the housing stock, directly have an impact on the essential level of energy service. As a result, the essential level of the different energy services would be calculated for households belonging to various buckets within each element (e.g., an essential level of gas service for households living in older housing stock).

Under this approach, DC would define the resulting HM metric for each utility service, each season (heating and cooling), and the various essential levels of energy service. The District would then define an AR for each income percentile and essential level of energy service. The housing cost calculations for each AR metric should account for income and the elements (that directly impact essential levels of energy service) that were previously identified. For example, in the AR20 metric, the District could calculate the housing costs based on 20th percentile income households living in older housing stock.

Housing characteristics analysis

In calculating the AR20 and AR50 metrics, Synapse averaged housing costs for the 20th and 50th percentile income households. This simplified approach does not consider the many factors that may affect someone's housing costs, such as the size of the household, the size of the housing unit, the year in which the housing unit was purchased, and the location of the housing unit. To best determine housing costs for a household at a representative income level, the District should conduct a regression analysis that determines the relationship between the selected factors and housing cost. California's Affordability Rulemaking describes one methodology for conducting this regression analysis.[69]

All-electric vs. mixed-fuel customers

Using publicly available data, Synapse calculated the HM metric for electric customers in the summer and winter and for gas customers during the heating season. Because of data limitations, we could not differentiate all-electric customers (customers who use electricity for both heating and cooling) and customers who use electricity for cooling but gas or other fuels for heating. We recommend calculating the HM for each of these customer groups, as their electricity consumption in the winter will greatly differ. Utilities should be able to provide this data.

[68] CPUC. "Decision on Pacific Gas and Electric Company's Proposed Rate Designs and Related Issues." Application 16-06-013. D.180-08-013. August 9, 2018. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M205/K749/205749505.PDF.

[69] Hancock, J., J. Ho, B. Sieren-Smith, E. Tome, A. Jain, W. Lai. 2020. Affordability Metrics Framework Staff Proposal Appendix A. Prepared for R.18-07-006.https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M344/K054/344054346.pdf.

Ward-level calculations

The District may wish to calculate these affordability metrics by ward. For the HM metric, this is straightforward if the essential level of utility service is identified by ward. However, the AR metric uses income and housing cost data provided by the U.S. Census Bureau via the PUMS dataset. At the finest granularity, PUMS provides data at the Public Use Microdata Area level. PUMA boundary lines do not match directly with ward areas and cannot be aggregated into wards. As a result, the AR metric cannot be calculated for each ward based on Census data alone.

3. LOW-INCOME ENERGY ASSISTANCE PROGRAMS IN DC

Energy assistance programs serve as crucial safety nets for low-income households and vulnerable populations who may struggle to pay high utility bills and maintain essential energy services. Residents of the District of Columbia have access to several forms of energy assistance. The most widely used are the federally funded Low-Income Home Energy Assistance Program (LIHEAP) and utility-funded programs such as the Residential Aid Discount (RAD) and Residential Essential Services (RES) mentioned in section 2.2.

LIHEAP, which in DC is administered by the Department of Energy and Environment (DOEE), provides funding to help low-income households pay for heating and cooling energy costs. DC households with households with incomes at or below 60 percent of the state median Income (SMI) are eligible for LIHEAP.[70] Other energy affordability programs in the District have a higher income threshold, enabling more people to benefit: 80 percent of area median income (AMI). For the remainder of this report, the term "low-income households" is used to refer those at or below 80 percent of AMI, to encompasses all both LIHEAP-eligible households and those eligible for other energy assistance in the District.

As of 2023, U.S. Census data show, there were more than 151,000 low-income households in the District—about 45 percent of all DC households.[71] Of these, about 74 percent, or more than 112,000 households, fell below 60 percent of SMI and therefore qualified for LIHEAP. Despite this large eligible population, a study for the DC Office of the People's Counsel found that only about a quarter of eligible households participated in LIHEAP in 2019.[72] This participation gap highlights a critical challenge: even well-funded programs may fail to achieve impact if barriers to enrollment or awareness persist.

[70] See https://doee.dc.gov/liheap.

[71] U.S. Census Bureau. 2023. "American Community Survey 1-Year Estimates: Public Use Microdata Sample." https://www.census.gov/programs-surveys/acs/microdata/access.html. [Accessed on April 11, 2025.]

[72] APPRISE, Inc. 2020. "Energy Affordability Study Population Characterization Report." Report prepared for the Office of the People's Counsel of the District of Columbia. Princeton, NJ. https://opc-dc.gov/wp-content/uploads/2024/11/DC-OPC-Energy-Affordability-Study-Population-Characterization-Report-FINAL-12-18-20.pdf.

Low-income households in DC are predominantly renters. Roughly 78 percent of households below 80 percent of AMI rent their homes, U.S. Census data show, while 54 percent of higher-income households are homeowners. Moreover, 79 percent of lower-income households live in multifamily buildings. Housing tenure and unit type are key factors for program design because renters and multifamily households often face additional barriers to accessing energy efficiency or assistance programs. For example, renters may lack control over utility accounts or energy upgrades in their building, and multifamily housing can complicate the delivery of benefits when costs and savings must be shared between landlords and tenants. Recognizing these structural characteristics is essential for designing assistance programs that equitably reach and benefit DC's low-income residents.[73]

3.1. Types of Energy Assistance Programs

The landscape of energy assistance includes a range of program types, each designed to address different aspects of energy affordability. Generally, these programs fall into the following categories:

- **Discounted utility rates** provide ongoing bill reductions through reduced per-unit charges on customers' monthly bills (usually by a flat amount or a percentage).
- **Energy assistance funding** involves grants to help customers pay their energy bills and can take the form of a flat dollar amount or a percentage of the customer's bill.
- **Percentage of Income Payment Plans (PIPPs)** cap energy bills at a fixed percentage of household income, typically between 3 and 6 percent, and provides bill credits to ensure participating customers' bills do not exceed this percentage.
- **Arrearage management programs** help customers eliminate outstanding debt through forgiveness plans tied to consistent payment behavior.
- **Energy efficiency programs** provide funding for weatherization, appliance upgrades, and home improvements that reduce overall energy consumption, thereby reducing bills in the long term.
- **Distributed energy resources programs** subsidize customers' rooftop solar installation or community solar subscription, enabling them to lower utility bills by generating their own electricity.

Some programs may combine multiple aspects of the categories above, and jurisdictions often offer different sets of programs.[74]

[73] Morales, D. and S. Nadel. 2022. "Meeting the Challenge: A Review of Energy Efficiency Program Offerings for Low-Income Households." Washington, DC: American Council for an Energy-Efficient Economy. https://www.aceee.org/research-report/u2205.

[74] Nishi, A., D. Hernández, and M.B. Gerrard. 2023. "Energy Insecurity Mitigation: The Low Income Home Energy Assistance Program and Other Low-Income Relief Programs in the US." New York: Center on Global Energy Policy, Columbia University.

Aside from program design, the funding sources for energy assistance and other energy affordability programs can also vary. Programs can be funded through utility rates, federal and state taxpayer funds, other funding sources (e.g., revenues from a cap-and-invest program), or a combination of these. Together, these programs form a multifaceted suite of solutions for energy affordability, helping make energy bills more manageable and prevent service disconnections for low-income households.

The sections that follow describe the energy assistance programs available in the District, including ratepayer-funded and federally funded programs. We describe each program's structure and eligibility, provide funding sources and amounts, and present some indicators of program performance and impact.

3.2. Ratepayer-funded programs

Except where noted otherwise, the programs described in this section are open to District households whose income falls below 80 percent of the AMI. For fiscal year 2025 (October 1, 2024–September 30, 2025), this meant that a customer's household income must not exceed the following limits:[75]

- $86,650 for a one-person household
- $99,000 for a two-person household
- $111,400 for a three-person household
- $123,750 for a four-person household
- $133,650 for a five-person household
- $143,550 for a six-person household
- $153,450 for seven-person household
- $163,350 for an eight-person household

https://www.energypolicy.columbia.edu/publications/energy-insecurity-mitigation-the-low-income-home-energy-assistance-program-and-other-low-income-relief-programs-in-the-us/.

[75] See the DOEE web page "Receive Discounts on Your Utility Bills (UDP)." DOEE website. https://doee.dc.gov/udp. Note that while for households with 1–4 people, the income threshold is 80 percent of the AMI, for 5–8 person households, the threshold is about $3,000–$10,000 lower than 80 percent of AMI.

Residential Aid Discount/Residential Essential Services

Program structure

Residential Aid Discount (RAD) and Residential Essential Services (RES) are electricity and gas bill discounts, respectively, on the distribution portion of a low-income customer's monthly bill. RAD is for Pepco's electric customers and RES is for WGL's gas customers.

RAD customers receive a bill credit that covers all of their distribution charges, including both the customer charge and energy charges. These customers are exempt from the RAD surcharge, Sustainable Energy Trust Fund surcharge, and the Energy Assistance Trust Fund surcharge. This means that RAD customers only pay generation and transmission charges.[76,77]

Similarly, RES customers receive a bill credit that covers 100 percent of their distribution charges during the heating season (November through April) and 50 percent of their customer charge during the non-heating season.[78,79] RES customers are also exempt from the RES surcharge, Sustainable Energy Trust Fund surcharge, and the Energy Assistance Trust Fund surcharge.[80]The discount is equal to approximately 25 percent of a typical RAD customer's bill and 50 percent of a typical RES customer's bill

[76] See the PSC's web page "Utility discount programs, bill credits, and other assistance": https://dcpsc.org/Consumers-Corner/Programs/Utility-discount-programs,-bill-credits-and-other.aspx. [Accessed April 11, 2025.]

[77] Pepco previously billed RAD customers for those surcharges and then credited them back to RAD customers, but the Company recently secured approval from the DC PSC to exclude any customer actively enrolled in the RAD program from being billed for surcharges upfront. See The Public Service Commission of the District of Columbia, in PEPRADR-2024-01 and PEPRADR-2023-01, Order No. 22305. September 25, 2024.[78] FC 1162. Order No. 20705. February 24, 2021. Page 13. Available at: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=112475&guidFileName=34453791-4d22-42cf-bf68-4a18004c6ba4.pdf.[79] See the Washington Gas web page "Energy Assistance: District of Columbia Residents": https://www.washingtongas.com/get-assistance/energy-assistance.

[78] FC 1162. Order No. 20705. February 24, 2021. Page 13. Available at: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=112475&guidFileName=34453791-4d22-42cf-bf68-4a18004c6ba4.pdf.[79] See the Washington Gas web page "Energy Assistance: District of Columbia Residents": https://www.washingtongas.com/get-assistance/energy-assistance.

[79] See the Washington Gas web page "Energy Assistance: District of Columbia Residents": https://www.washingtongas.com/get-assistance/energy-assistance.

[80] 2024 WGL Bill Insert. https://www.washingtongas.com/-/media/ecc3a037db0e44e5b74bcd61aac71888.pdf.[81] District of Columbia Public Service Commission (DC PSC). "Utility discount programs, bill credits, and other assistance." PSC website. https://dcpsc.org/Consumers-Corner/Programs/Utility-discount-programs,-bill-credits-and-other.aspx. [Accessed April 11, 2025.][82] FC 1169. Order No. 21939. Page 126. Available at: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=197526&guidFileName=c901ca24-b864-4b05-b6d1-c1dfc528fc03.pdf.[83] Potomac Electric Power Company (Pepco). Accessed April 11, 2025. "Residential Aid Discount Program." Pepco website. https://www.pepco.com/my-account/customer-support/assistance-programs-dc/bill-payment-assistance/residential-aid-discount-program.

during the heating season.[81,82] Certified RAD customers can receive the discount for 18 months, and customers may re-apply for certification annually.[83] RES customers must also re-enroll in the program each year.

Eligibility

The Department of Energy and the Environment (DOEE) certifies District of Columbia utility customers as eligible for RAD and RES, with RES requiring the customer to use natural gas as their principal source for home heating.[84] As noted above, the programs are open to households whose income falls below 80 percent of the AMI. Households seeking the discount can apply for the program by submitting an online application through DOEE's website, scheduling an in-person appointment at one of DOEE's Energy Centers, or by mailing the application to DOEE.

Funding

Pepco files an annual RAD Surcharge and WGL files an annual RES Surcharge with the Public Service Commission (PSC). The Commission approves the RAD and RES costs, respectively, for the next year and accordingly establishes a dollar per kilowatt-hour charge to levy on all other customers—not only residential customers—to collect the RAD and RES costs. The annual filings also contain true-ups from the previous period to address any over- or under-collections from the RAD and RES surcharges for the forecast period. The current RAD surcharge, effective for service on and after October 14, 2024, is $0.000860 per kilowatt-hour, while the current RES surcharge, to be billed from December 2024 to November 2025, is $0.0111 per therm. Table 4 and Table 5 show the total credits provided to RAD and RES customers, respectively, in recent years.

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[81] District of Columbia Public Service Commission (DC PSC). "Utility discount programs, bill credits, and other assistance." PSC website. https://dcpsc.org/Consumers-Corner/Programs/Utility-discount-programs,-bill-credits-and-other.aspx. [Accessed April 11, 2025.][82] FC 1169. Order No. 21939. Page 126. Available at: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=197526&guidFileName=c901ca24-b864-4b05-b6d1-c1dfc528fc03.pdf.[83] Potomac Electric Power Company (Pepco). Accessed April 11, 2025. "Residential Aid Discount Program." Pepco website. https://www.pepco.com/my-account/customer-support/assistance-programs-dc/bill-payment-assistance/residential-aid-discount-program.

[82] FC 1169. Order No. 21939. Page 126. Available at: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=197526&guidFileName=c901ca24-b864-4b05-b6d1-c1dfc528fc03.pdf.[83] Potomac Electric Power Company (Pepco). Accessed April 11, 2025. "Residential Aid Discount Program." Pepco website. https://www.pepco.com/my-account/customer-support/assistance-programs-dc/bill-payment-assistance/residential-aid-discount-program.

[83] Potomac Electric Power Company (Pepco). Accessed April 11, 2025. "Residential Aid Discount Program." Pepco website. https://www.pepco.com/my-account/customer-support/assistance-programs-dc/bill-payment-assistance/residential-aid-discount-program.

[84] WGL. Accessed April 11, 2025. "Energy Assistance: District of Columbia Residents." Washington Gas website. https://www.washingtongas.com/get-assistance/energy-assistance.

Table 4. Total residential aid credited to RAD customers by program year

Time period	March 2021–Feb. 2022	March 2022–Feb. 2023	March 2023–Feb. 2024
RAD credit	$7,229,116	$10,735,160	$9,127,799

Sources: PEPRADR2022-01-E – 1 Attachment B. Pepco's compliance filing for Rider "RADS"– Residential Aid Discount Surcharge. 4.6.22; PEPRADR2023-01-E – 5 Attachment B. Pepco's compliance filing for Rider "RADS"– Residential Aid Discount Surcharge. 9.29.23; PEPRADR2024-01-E – 2, Attachment B. Pepco's compliance filing for Rider "RADS"– Residential Aid Discount Surcharge. 5.20.24.

Table 5. Total assistance credited to RES customers by program year

Time period	Nov. 2021–Oct. 2022	Nov. 2022–Oct. 2023	Nov. 2023–Oct. 2024
RES credit	$1,877,291	$2,193,943	$2,790,322

Sources: WGLRESR-2022-01 - 3, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2022. WGLRESR-2023-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2023. WGLRESR-2024-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.20.2024.

Program performance

Table 6 presents the number of participating RAD customers and the benefits per participant by program year. Pepco has acknowledged the lower participation numbers in the latest program year, noting that "decreased participation [is] driving [a] lower program cost...from June 2024 through May 2025" but did not explain the causes underlying decreased participation.[85]

Table 6. Number of participating RAD customers and benefits per participant by program year

Time period	March 2021–Feb. 2022	March 2022–Feb. 2023	March 2023–Feb. 2024
Participants	25,889[a]	28,442[b]	22,809[c]
Avg. benefit per participant	$279.24	$377.44	$400.18

Notes: Participant numbers come from the same annual filings, respectively, cited as in Table 4. Calculating Benefits per Participant requires dividing the credit amount in Table 4 by the participant number in Table 6. [(a)] February 2022 actual RAD customers; [(b)] February 2023 actual RAD customers; [(c)] Average actual customers from March 2023 to February 2024.

Table 7 presents the number of participating RES customers and the benefits per participant by program year.

[85] PEPRADR2024-01-E – 2, Attachment B. Pepco's compliance filing for Rider "RADS"– Residential Aid Discount Surcharge. 5.20.24.

Table 7. Number of participating RES customers and benefits per participant by program year

Time Period	Nov. 2021–Oct. 2022	Nov. 2022–Oct. 2023	Nov. 2023–Oct. 2024
Participants	5,451	7,092	7,512
Avg. benefit per participant	$344.39	$309.35	$371.45

Sources: WGLRESR-2022-01 - 3, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2022. WGLRESR-2023-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2023. WGLRESR-2024-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.20.2024. Notes: Calculating Benefits per Participant requires dividing the credit amount in Table 5 by the participant number in Table 7.

Arrearage Management Programs

Program structure

Arrearage management programs (AMPs) provide customers the opportunity to receive forgiveness for past-due debt. WGL and Pepco both offer AMPs to District customers.

Under WGL's AMP,[86] WGL will forgive past-due balances for customers who successfully complete a 12-month payment plan,[87] as long as they first bring their past-due balance down to $3,000 or less. Customer accounts enrolled in AMP are placed on a "Budget Plan," allowing customers to spread the cost of gas bills over the whole year, with steady monthly payments. For each month a customer pays the Budget Plan bill amount, one-twelfth of their arrearage balance at the time of program enrollment is forgiven. Customers can miss up to two full-and-on-time monthly payments and still participate in the program, but after a third missed payment, WGL will cancel their AMP.[88]

Similarly, customers enrolled in Pepco's AMP receive monthly bill credits of one-twelfth of their arrearages balance. At the end of the 12 months, the customer's arrearage balance is completely forgiven. Customers who have arrearage balances over $3,600 can receive monthly credits calculated differently, and the total length of the program may be longer. In addition, Pepco waives the $35 reconnection fee for terminated customers participating in the AMP.[89]

[86] Note that at the time of this report, potential changes to WGL's AMP program were before the Commission. See FC 1164, "Joint Report on Arrearage Management Program." July 30, 2025. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=227312&guidFileName=5815381c-f377-481d-a5a0-d5a757835202.pdf.

[87] *See* Washington Gas. "Energy Assistance." https://www.washingtongas.com/get-assistance/energy-assistance. [Accessed April 11, 2025.]

[88] *See* FC 1164, Order No. 20990. August 9, 2021: https://edocket.dcpsc.org/apis/api/Filing/download?attachId=139536&guidFileName=2193bbc6-17df-447a-b7d9-bb32ff767019.pdf.

[89] Apprise, Inc. May 2021. *Pepco Arrearage Management Program Evaluation: Final Report.* Available at: https://www.appriseinc.org/wp-content/uploads/2022/09/Final-Pepco-AMP-Evaluation-Report-5-21-21.pdf.

Eligibility

To be eligible for an AMP, customers must apply and be approved by the DOEE for energy assistance within 12 months prior to applying for the AMP. The same income thresholds apply as with RAP and RES: customers' annual household income must be less than 80 percent of AMI.[90]

Customers who have been approved by DOEE for energy assistance will automatically be enrolled in WGL's AMP program.[91] To qualify for WGL's AMP specifically, customers must have a maximum arrearage balance of $3,000. If a customer has a past-due balance of more than $3,000, they must first reduce the balance to less than $3,000 before they are eligible for WGL's AMP. Customers can miss up to two full-and-on-time monthly payments and still participate in the program, but after a third missed payment WGL will cancel their AMP program.[92]

To be eligible for Pepco's AMP, customers must be currently or recently participating in the RAD program and have a minimum arrearage balance of $300 or more that is at least 60 days past due.[93]

Funding

WGL recovers AMP costs through the RES surcharge on non-RES customers, described above. WGL's annual RES Surcharge filing with the DC PSC also estimates its AMP costs for the coming year. Table 8 shows the annual AMP cost forecast in recent years.

Table 8. AMP cost forecast by program year

Time period	Nov. 2021–Oct. 2022	Nov. 2022–Oct. 2023	Nov. 2023–Oct. 2024
AMP cost	$246,994	$1,215,579	$694,188

Sources: WGLRESR-2022-01 - 3, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2022. WGLRESR-2023-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.17.2023. WGLRESR-2024-01 - 2, Washington Gas Light Company's Annual Residential Essential Service Surcharge Reconciliation Factor. 11.20.2024

Pepco recovers the costs of its AMP through base rates. The costs of distribution-related arrearages forgiven through the AMP are recovered through distribution rate cases and supply- and transmission-

[90] See FC 1164, Order No. 20749. May 27, 2021. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=125083&guidFileName=e6080107-0565-4324-b180-71900e02ef50.pdf.

[91] See FC 1164, Order No. 21536. October 6, 2022. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=182333&guidFileName=275d2bc6-f012-47c1-98a4-bbc2f187cfc7.pdf.

[92] See FC 1164, Order No. 20990. August 9, 2021. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=139536&guidFileName=2193bbc6-17df-447a-b7d9-bb32ff767019.pdf.

[93] Pepco. Accessed April 11, 2025. "Bill Payment Assistance." Pepco website. Available at: https://www.pepco.com/my-account/customer-support/assistance-programs-dc/bill-payment-assistance.

related arrearages are included in uncollectible expenses in FC 1017[94] (recovery of standard offer service) or Docket PEPPOR[95] (third-party supplier costs).[96]

Program performance

An evaluation of Pepco's AMP after its first year found that the average AMP participant had reduced their arrears by $897 after 12 months, with an average balance of $553 remaining.[97]

Since it was launched in 2021, WGL has enrolled more than 8,900 customers in its AMP.[98] Participation in WGL's AMP has varied, reaching a peak of over 4,000 customers enrolled in 2023.[99] As of June 30, 2025, WGL had 1,321 customers enrolled—out of 2,380 low-income customers who were in arrears.[100] In total, 1,062 customers have completed the AMP and avoided disconnection through the AMP since the start of the program.

Table 9. Average credit per customer in WGL's AMP

Year	2022	2023	2024
Credit amount per AMP participant ($)	$100.31	$203.55	$246.99

Note: 2024 data only available through September. Source: FC 1164. WGL Quarterly AMP Reports. Available at: https://edocket.dcpsc.org/public/search/casenumber/fc1164.

Deferred payment plans

A deferred payment agreement (DPA) is an agreement whereby a utility customer pays a past-due balance in a series of installments over time. In accordance with legislation surrounding the COVID-19 public health emergency, the Commission required utilities to provide DPAs to eligible residential customers.[101] These programs allow customers to pay utility bills across a minimum of 12 months

[94] See FC 1017, "In the Matter of the Development and Designation of Standard Offer Service in the District of Columbia": https://edocket.dcpsc.org/public/search/casenumber/fc1017.

[95] See Docket PEPPOR, Pepco's Purchase of Receivables Reports and Filings: https://edocket.dcpsc.org/public/search/casetype/peppor.

[96] See FC 1119, FC 1017, and Docket PEPPOR, Order No. 19718. October 18, 2018. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=81396&guidFileName=814ae28d-9dad-4574-a3b1-7e1fd6a8b98d.pdf.

[97] Apprise, Inc. May 2021. *Pepco Arrearage Management Program Evaluation: Final Report.* Available at: https://www.appriseinc.org/wp-content/uploads/2022/09/Final-Pepco-AMP-Evaluation-Report-5-21-21.pdf.

[98] See FC 1164 WGL's "Joint Report on Arrearage Management Program" July 30, 2025. https://edocket.dcpsc.org/apis/api/Filing/download?attachId=227312&guidFileName=5815381c-f377-481d-a5a0-d5a757835202.pdf.

[99] See FC 1164. WGL Quarterly AMP Reports. https://edocket.dcpsc.org/public/search/casenumber/fc1164.

[100] See WGL quarterly AMP reports, available at https://edocket.dcpsc.org/public/search/casenumber/fc1164.

[101] See Order No. 20707 in Formal Case 1164 (March 3, 2021): https://edocket.dcpsc.org/apis/api/Filing/download?attachId=113124&guidFileName=4ac511c2-4036-4103-9572-c1f466d8dfdf.pdf.

through a structured payment plan. Customers are eligible if they are in arrears and request to enter into a DPA.

Incremental costs associated with COVID-19, including bad debt expense and lost revenues, are recorded in a regulatory asset account and are covered in future rate cases.[102]

Solar for All

Program structure

The Solar for All Program aims to deliver electric bill savings of up to 50 percent over 15 years (or about $500 per year) to 100,000 low- and moderate-income households in the District by providing free installations of rooftop solar or free subscriptions to a community solar facility.[103] DOEE administers the program, in partnership with the DC Sustainable Energy Utility (DCSEU) and other local organizations that install or contract for rooftop and community solar systems. Eligible households can apply for Solar for All community solar through DOEE's website and for rooftop solar through DCSEU's website.

Eligibility

Solar for All targets both low-income and moderate-income households, defined as those having a household income at or below 80 percent of the AMI (see the thresholds listed above). The program also allows households to demonstrate eligibility based on their participation in other means-tested programs, including LIHEAP, the Weatherization Assistance Program (WAP; see next section), the Supplemental Nutrition Assistance Program (SNAP), Temporary Assistance for Needy Families (TANF), and Supplemental Security Income (SSI).[104]

Funding

The Solar for All program is funded through the DC Renewable Energy Development Fund (REDF), which is funded through compliance fees paid by electricity suppliers as required by the District's Renewable Portfolio Standard (RPS). In fiscal 2022, funding from the American Rescue Plan Act (ARPA) was also used to support the program. Table 10 shows the program budget for fiscal years 2020–2022.

[102] See GD2020-01, Order No. 20329 (April 15, 2020): https://edocket.dcpsc.org/apis/api/filing/download?attachId=102978&guidFileName=beec1708-3dbb-4eef-ada6-01c89e1d76b4.pdf.

[103] See the District of Columbia Sustainable Energy Utility (DCSEU) web page "Solar for All": https://doee.dc.gov/solarforall.

[104] DCSEU. Accessed April 11, 2025. "Solar for All." DCSEU website. Available at: https://www.dcseu.com/solar-for-all.

Table 10. Solar for All budget by fiscal year

Year	FY 2020	FY 2021	FY 2022
ARPA	$0	$0	$10,583,985
REDF	$27,728,450	$17,546,260	$2,387,365
Total	**$27,728,450**	**$17,546,260**	**$12,971,350**

Source: DC DOEE. Fiscal Year 2020 Solar for All Annual Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/FY%202020%20SFA%20Annual%20Report.pdf; DC DOEE. Fiscal Year 2021 Solar for All Program Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/FY%202021%20Solar%20for%20All%20Annual%20Report.pdf; DC DOEE. Fiscal Year 2022 Solar for All Program Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/FY%2022%20SFA%20Report%20Final%20Version.pdf.

Program performance

Information on the number of rooftop and community solar projects installed under the program and the direct benefits to participants are limited. Table 11 provides the total solar capacity installed under the program—including both rooftop solar and community solar—as well as the number of households receiving program benefits in fiscal years 2020–2022.

Table 11. Total solar capacity installed and number of households receiving benefits under Solar for All

Year	FY 2020	FY 2021	FY 2022
Total solar capacity installed	11.01 MW	8.59 MW	7.21 MW
Total households receiving benefits	3,103	Over 2,500	Over 1,925

Sources: DOEE. Fiscal Year 2020 Solar for All Annual Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/ddoe/service_content/attachments/FY%202020%20SFA%20Annual%20Report.pdf; DC DOEE. Fiscal Year 2021 Solar for All Program Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/FY%202021%20Solar%20for%20All%20Annual%20Report.pdf; DOEE. Fiscal Year 2022 Solar for All Program Report. Available at: https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/FY%2022%20SFA%20Report%20Final%20Version.pdf.

3.3. Federally funded programs

Low-Income Home Energy Assistance Program

Program structure

The Low-Income Home Energy Assistance Program (LIHEAP) provides funding to help low-income households pay for heating and cooling energy costs. It pays benefits directly to utility companies on customers' behalf, thus reducing their bill. Eligible households can receive a "regular benefit" between $250 and $1,800 once per fiscal year, with the amount determined using a benefit matrix that takes into

account household size, total household income, heating source, and type of dwelling.[105] In general, households that live in single-family homes and have more people, lower incomes, and oil or gas heating receive higher benefits from the program.

In addition, the program provides emergency assistance ("crisis benefits") to households that have been disconnected from utility service, have received a disconnection notice, or have 5 percent or less heating oil capacity. The emergency benefit applies to the household's outstanding utility bill balance after application of the regular benefit, up to $750.

The DOEE administers the LIHEAP program for the District. The program is usually open for applications in early October of each year and remains open until funds have been depleted. Households seeking energy assistance can apply for the program by submitting an online application through the DOEE website, scheduling an in-person appointment at a DOEE Energy Center, or by mailing an application.

Eligibility

To be eligible for LIHEAP benefits, households must have an annual income below 60 percent of the SMI. For fiscal 2025, this threshold translates to the following:

- $57,571 for a one-person household
- $75,286 for a two-person household
- $93,001 for a three-person household
- $110,715 for a four-person household
- $128,429 for a five-person household
- $146,144 for a six-person household
- $149,465 for a seven-person household
- $152,787 for an eight-person household[106]

Households are also considered eligible for LIHEAP if at least one member of the household receives SNAP, TANF, or SSI benefits.[107]

Funding

Funding for the District's LIHEAP program comes from federal funding—through the U.S. Department of Health and Human Services (HHS)—and local funding. Local funding for LIHEAP comes from the Energy

[105] District of Columbia Department of Energy and Environment (DOEE). "DOEE's LIHEAP Regular Benefits Table for FY 2024." https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/DOEE%20FY24%20LIHEAP_REGULAR_Benefits_Table-Matrix.pdf.

[106] See the DOEE web page for LIHEAP: https://doee.dc.gov/vi/liheap.

[107] See Detailed Model Plan (LIHEAP): https://doee.dc.gov/sites/default/files/dc/sites/doee/service_content/attachments/DETAILED%20MODEL%20PLAN%20%28LIHEAP%29_10_2_24.pdf, p. 5.

Assistance Trust Fund (EATF), which is funded by a surcharge on utility customers in the District. Federal LIHEAP funding also supports the Weatherization Assistance Program, which we discuss in detail below.

Table 12 shows the amount of federal funding for the District's LIHEAP program and the amount spent on program benefits—which is the amount that flows directly to District residents as energy assistance—for fiscal years 2020–2023. The regular benefit is categorized as "heating benefits" or "cooling benefits," depending on the time of year.

Table 12. LIHEAP federal funding and benefits amount – Washington DC

Year	FY 2020	FY 2021	FY 2022	FY 2023
Total program funding	**$14,769,286**	**$29,413,093**	**$23,631,353**	**$19,696,984**
Heating benefits	$6,759,526	$8,769,991	$6,472,906	$8,234,204
Cooling benefits	$368,477	$1,287,636	$6,917,468	$1,002,320
Crisis benefits	$2,230,443	$5,001,269	$5,780,893	$5,903,348
Weatherization benefits	$1,108,602	$1,434,539	$2,137,809	$1,122,299
Total benefits	**$10,467,048**	**$16,493,435**	**$21,309,076**	**$16,262,171**

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

However, the future of federal LIHEAP funding is uncertain. In April 2025, the Trump Administration terminated the entire federal staff who administered LIHEAP at the U.S. Department of Health and Human Services (HHS), effectively freezing the remaining fiscal 2025 funds despite their having been approved by Congress.[108] Those remaining fiscal 2025 funds were subsequently released,[109] the future of the program remains uncertain. The Trump Administration's proposed fiscal year 2026 budget would eliminate federal LIHEAP funding entirely.[110] The potential elimination or reduction of LIHEAP funding should be a serious concern as the District evaluates energy affordability for gas and electric utility customers.

Program performance

HHS's LIHEAP Performance Management website provides detailed information on states' use of LIHEAP funds and on funding recipients. Table 13 through Table 15 show the number of households receiving federally funded LIHEAP benefits, the percentage of income-eligible households served by federally funded LIHEAP benefits, and the average LIHEAP benefits per participating household in the District for

[108] PBS. 2025. "Utility Assistance Frozen after Trump Administration Fires Program's Staff." *PBS News Hour,* April 24. https://www.pbs.org/newshour/show/utility-assistance-frozen-after-trump-administration-fires-programs-staff.

[109] U.S. Department of Health & Human Services, Office of Community Services. 2025. "LIHEAP DCL- 2025-02 Final Funding Release of Federal Fiscal Year 2025 (FY25)". May 1. https://acf.gov/ocs/policy-guidance/liheap-dcl-2025-02-final-funding-release-federal-fiscal-year-2025.

[110] National Energy Assistance Directors Association. 2025. "President's FY 2026 Budget Eliminates Federal Funding for LIHEAP." https://neada.org/wp-content/uploads/2025/05/Presidents-FY-26-Budget-LIHEAP-1-1.pdf.

each year in fiscal years 2020–2023. Table 16 in the following section provides data on weatherization benefits.

Table 13. Number of households receiving LIHEAP benefits in the District of Columbia

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	8,608	8,970	8,035	12,349
Cooling benefits	672	2,263	13,480	1,757
Crisis benefits	2,601	2,155	4,700	5,961

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 14. Share of income-eligible households receiving LIHEAP benefits in the District of Columbia

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	11.237%	11.678%	9.377%	13.87%
Cooling benefits	0.877%	2.946%	15.731%	1.973%
Crisis benefits	3.396%	2.806%	5.485%	6.695%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 15. Average LIHEAP benefits per participating household in the District of Columbia

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	$785	$1,144	$580	$914
Cooling benefits	$548	$622	$594	$829
Crisis benefits	$497	$494	$623	$1,158

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Weatherization Assistance Program

Program structure

The Weatherization Assistance Program (WAP) provides low-income households with technical and financial assistance to improve the energy efficiency of their homes—and thereby reduce energy bills. This includes performing energy audits and installing energy efficiency measures such as insulation, duct sealing, heating and cooling system repairs or replacement, air infiltration mitigation, roof repair, mold remediation, and a switch to ENERGY STAR-rated lighting and appliances.[111]

DOEE administers WAP in partnership with community-based and nonprofit organizations that hire local contractors to perform audit-recommended installations. Eligible households can apply for the program electronically through DOEE's website or email or by mailing an application to DOEE. The application for the WAP is combined with DOEE's Emergency Mechanical Systems Replacement and Lead Reduction programs.

[111] See the DOEE web page "Weatherization Assistance Program (WAP)": https://doee.dc.gov/service/wap.

Eligibility

Similar to LIHEAP, WAP benefits are available to households with annual income below 60 percent of the SMI, as well as households with at least one member receiving TANF or SSI benefits. Multifamily dwellings with two to four units are eligible if at least 50 percent of households are eligible, and those with five or more units are eligible if at least 66 percent of households are eligible.

Funding

Funding for WAP is included in the federal funding for LIHEAP. Table 12 shows funding levels for the 2020–2023 fiscal years, which ranged from $1,108,602 in fiscal 2020 to a peak of $2,137,809 in fiscal 2023. Because WAP draws from the same funding as LIHEAP, funding and staffing changes that affect LIHEAP, as discussed above, will also affect WAP.

Program performance

HHS's LIHEAP Performance Management website provides data on weatherization benefits and recipients. Table 16 provides the number of households receiving federally funded WAP benefits, the percentage of income-eligible households served by federally funded WAP benefits, and the average WAP benefits per participating household in the District in fiscal years 2020–2023.

Table 16. Households receiving federally funded WAP benefits – Washington, DC

Year	FY 2020	FY 2021	FY 2022	FY 2023
Number of households served	110	115	77	158
Percent of income-eligible households served	0.144%	0.15%	0.09%	0.178%
Average benefit per participating household	$10,078	$12,474	$27,764	$7,103

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

3.4. Utility Consumer Bill of Rights

Along with the energy assistance programs described above, the District also provides utility customers with certain protections under the PSC's Consumer Bill of Rights (CBOR).[112] Among other regulations, the CBOR provides requirements related to utility disconnections, including protections for customers with medical necessity and for all customers during periods of extreme weather.[113] The CBOR also includes the right of customers to enter in deferred payment agreements for their past-due balances.

[112] District of Columbia Public Service Commission (DC PSC). Consumer Bill of Rights. https://dcpsc.org/Consumers-Corner/Utility-Bills-Complaints-and-Service-Providers/Consumer-Bill-of-Rights.aspx.

[113] District of Columbia Municipal Regulations, Chapter 3: Consumer Rights and Responsibilities, Section 310-311. https://dcpsc.org/getattachment/Orders-and-Regulations/Orders-Rules-and-Regulations/District-of-Columbia-Municipal-Regulations-Title-1/15-3-Compiled-(3).pdf.aspx?lang=en-US

4. LEARNING FROM OTHER JURISDICTIONS

Just as the District of Columbia can use California as a model for building an energy affordability framework, it can learn from practices and measures adopted in other states. This section begins with a brief overview of common best practices for energy assistance and affordability programs for low- and moderate-income residents. It then looks more closely at Maryland, Illinois, and Massachusetts, providing detailed descriptions of their programs and drawing out recommendations for the District.

4.1. Best practices for energy assistance and other energy affordability programs

Policy experts have identified criteria and best practices for effective energy assistance and other energy affordability programs, including the following:

- Programs should provide **maximum benefits** to the recipients of the program relative to the dollars funded by utility customers.[114]
- **Consumer education** should make eligible households aware of available assistance and how to reduce their energy bills.[115]
- Programs should lower collection costs, service disconnections, arrearages, and debt write-offs.[116,117]
- Programs should **streamline application processes**—for instance, by **using categorical eligibility** (such as automatically granting eligibility for energy assistance programs to participants in other means-tested programs, such as SNAP) and **automatic enrollment** to reduce burden on administrators and applicants.[118]

[114] Costello, K.W. 2021. "Making Utility Assistance to Low-Income Households More Effective." *The Regulatory Review*, November 23. https://www.theregreview.org/2021/11/23/costello-utility-assistance-low-income-households-effective/.

[115] Ibid.

[116] Ibid. See also: Lusson, K. 2024. "Protecting Access to Essential Utility Service During Extreme Heat and Climate Change." National Consumer Law Center. https://www.nclc.org/resources/protecting-access-to-essential-utility-service/.

[117] National Consumer Law Center and Center for Energy Poverty and Climate. 2024. "Protecting Access to Essential Utility Service During Extreme Heat and Climate Change." Available at: https://www.nclc.org/wp-content/uploads/2024/07/202407_Report_Protecting-Access-to-Essential-Utility-Service-in-the-Time-of-Extreme-Heat-and-Climate-Change.pdf.[118] Drehobl, A. and F. Castro-Alvarez. 2017. "Low-Income Energy Efficiency Programs: A Baseline Assessment of Programs Serving the 51 Largest Cities." American Council for an Energy-Efficient Economy. https://www.aceee.org/white-paper/low-income-ee-baseline.

[118] Drehobl, A. and F. Castro-Alvarez. 2017. "Low-Income Energy Efficiency Programs: A Baseline Assessment of Programs Serving the 51 Largest Cities." American Council for an Energy-Efficient Economy. https://www.aceee.org/white-paper/low-income-ee-baseline.

- Programs should **integrate diverse funding sources**, such as by partnering with federal programs like WAP.[119]

Policy experts have also identified criteria and best practices for effective energy efficiency programs targeted towards low-income households. While applicable to energy efficiency, they also hold relevant principles for energy assistance programs. These include the following:

- Programs should **provide a one-stop shop** that helps participants navigate program offerings.[120]

- Programs should specifically **address the needs of multifamily affordable housing**,[121] and they should seek to **provide benefits to tenants** who pay utility bills as well as those whose energy costs are included in rent.[122]

Most states measure and track energy assistance program outcomes purely based on participation in the program. Through our review, we have not found any jurisdictions that have adopted a comprehensive plan or evaluation framework around achieving specific affordability goals using other metrics—besides California, as discussed in section 2.1.

4.2. A Deep-Dive into Three Leading States

In order to provide more insights for the District, we closely examined practices in three states: Maryland, Massachusetts, and Illinois. All three have deregulated markets, meaning that the investor-owned utilities within those states own and maintain their distribution infrastructure, but they pass through supply and transmission costs to customers via surcharges on their utility bills. In addition, as in DC, customers may choose to participate in retail choice, where the customer can opt out of the utilities' default supply offering and can choose another electricity or natural gas supplier for their generation needs. All three states we surveyed are pursuing clean energy goals that have associated costs, such as taxpayer- or ratepayer-funded clean energy incentive programs or clean energy procurements to meet renewable portfolio standards. They also all have noteworthy energy assistance and other energy affordability programs.

We selected Maryland for its comprehensive portfolio of energy assistance programs, which promotes affordability for low-income households by providing grants, improving energy efficiency, and managing and reducing arrearages. Notably, the state has a combined application for all of its energy assistance programs, making it easy for customers to get the assistance they need. The programs also include

[119] Drehobl and Castro-Alvarez, 2017.

[120] Energy Efficiency For All. 2015. "Program Design Guide: Energy Efficiency Programs in Multifamily Affordable Housing." https://downloads.ctfassets.net/ntcn17ss1ow9/5tmOEuPodqb7jCvWrTItwd/5bfbee151daf4641d08e2ef036a1c669/Full_Program_Design_Guide.pdf.

[121] Ibid.

[122] Ibid. See also: Bilowich, J. 2023. "HUD Details Benefit Distribution of Community Solar in Affordable Housing." *LeadingAge* (blog), May 18. https://leadingage.org/hud-details-benefit-distribution-of-community-solar-in-affordable-housing/.

automatic enrollment for categorically eligible households, which further improves accessibility. Finally, the use of state funding sources helps alleviate the cost of energy assistance programs to ratepayers.

We selected Illinois because it was one of the first states to enact a Percentage of Income Payment Plan, which aims to reduce energy burden and keep utility bills affordable by capping participants' utility bills at no more than 6 percent of their income. Illinois utilities also offer energy efficiency programs for low-income customers, and state law requires utilities to bundle those offerings with other programs that serve low-income households, in order to maximize the benefits to these households.[123] Recently, the Illinois Commission authorized low-income discount rates for gas and electric utilities; this system provides tiered discounts based on income thresholds for low-income customers.

We selected Massachusetts because the state's utility regulator has prioritized affordability issues, including by opening a dedicated proceeding investigating energy affordability for residential ratepayers.[124] The ongoing proceeding will determine a statewide design for tiered, income-based electric and gas utility discounts aimed at reducing low-income customers' energy burdens equitably across income levels. To inform design of future energy assistance programs, the proceeding seeks stakeholder engagement regarding the appropriate percentage of household income used to pay electricity and heating bills.[125] One Massachusetts utility has already begun implementing tiered discount electric rates. In addition to these noteworthy initiatives, the state's arrearage management program is exemplary for its auto-enrollment of customers and detailed reporting.

In Table 17, we compare practices in the District with those in Maryland, Illinois, and Massachusetts. This table also relates these practices to the best practices mentioned above.

Table 17. Practices in DC and select jurisdictions and recommendations for DC programs

Category	Current DC practice	Practice in other jurisdictions	Recommendations for DC
Funding source	All programs except LIHEAP and WAP are funded by ratepayers	Maryland: Programs other than LIHEAP and WAP are funded by both ratepayers and state funds	Consider alternative funding source(s) to offset risk of federal LIHEAP/WAP funding disruption and diversify funding stream
Program offerings	Shutoff protection is only available for vulnerable populations or during periods of extreme weather	Maryland: Shutoff protection is available to any customers in arrears throughout the heating season (with timely payments under budget billing plan)	Consider extending protections to all customers in arrears within the heating and cooling seasons; if implemented, track data and monitor success of this change in avoiding shutoffs

[123] ILCS 5/8 Section 8-103B(c) https://www.ilga.gov/documents/legislation/ilcs/documents/022000050K8-103B.htm

[124] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Opened 1.4.2024.

[125] "DPU Issues Notice of Investigation on Energy Affordability for Massachusetts Ratepayers." Department of Public Utilities Press Release. 1.4.2024. https://www.mass.gov/news/dpu-issues-notice-of-investigation-on-energy-affordability-for-massachusetts-ratepayers.

Category	Current DC practice	Practice in other jurisdictions	Recommendations for DC
	Utility discounts exempt customers from certain bill components, but do not account for income	Illinois: Utility discount rates are tiered based on income (percentage-of-income payment plan, or PIPP) Massachusetts: Utility discounts are tiered depending on the participant's income	Consider implementing a PIPP or tiered discount program
	Utility discount is not tailored to achieving specific affordability metrics	Illinois: PIPP ensures participants' energy bills are capped at 6 percent of income Massachusetts: Tiered discount rates will be designed to achieve a particular energy burden level	If a PIPP or tiered discount program is implemented, tie discounts to affordability metrics
Program eligibility	Programs (LIHEAP, RAD, RES) require customers to have utility bills in their name	Maryland: For LIHEAP participants' whose energy costs are included in rent, benefits are paid to the landlord, and rent is reduced accordingly Illinois: LIHEAP participants with utilities included in their rent receive a cash benefit if they verify they do not have an energy bill under their name	Ensure that renters with energy costs included in their rent are eligible for assistance, and/or develop offerings for such renters—for example, multifamily energy efficiency programs that require landlords to agree to share the cost savings with tenants (for master-metered units)
Funding source Program offerings	All programs except LIHEAP and WAP are funded by ratepayers	Maryland: Programs other than LIHEAP and WAP are funded by both ratepayers and state funds	Consider alternative funding source(s) to offset risk of federal LIHEAP/WAP funding disruption and diversify funding stream
	Shutoff protection is only available for vulnerable populations or during periods of extreme weather	Maryland: Shutoff protection is available to any customers in arrears throughout the heating season (with timely payments under budget billing plan)	Consider extending protections to all customers in arrears within the heating and cooling seasons; if implemented, track data and monitor success of this change in avoiding shutoffs
	Utility discounts exempt customers from certain bill components, but do not account for income	Illinois: Utility discount rates are tiered based on income (percentage-of-income payment plan, or PIPP) Massachusetts: Utility discounts are tiered depending on the participant's income	Consider implementing a PIPP or tiered discount program

The following sections present federally funded, state-funded, and ratepayer-funded programs available in each state. For each program, we describe the program structure, eligibility, and funding sources and amounts. We also present some indicators of program performance and impact.

Maryland

Maryland law requires utilities to offer energy affordability programs for low-income households, noting that "the societal benefits of a well-constructed limited-income mechanism to benefit Maryland's

eligible limited-income customers are in the public interest."[126] Per statute, when evaluating a low-income program, the Maryland Public Service Commission (PSC) must consider several factors, including the degree to which the program promotes affordability for low-income customers; the impact on rates, customer arrearages and disconnections, and uncollectible costs; and the coordination of the program with other assistance.[127]

Maryland has a deregulated electricity and gas market that allows customers to select their electricity and gas supplier.

As detailed further below, Maryland's portfolio of energy assistance programs includes bill assistance programs, such as the Maryland Energy Assistance Program and the Electric Universal Service Program, and programs that assist customers with arrearages, such as the Arrearage Retirement Assistance program and the Universal Service Protection Program. With a combined application for these four programs, Maryland allows customers to easily identify and access these programs. In addition to applying for energy assistance programs, the Energy Assistance Application allows customers to opt in to be referred to energy efficiency programs provided by the Maryland Department of Housing and Community Development (DHCD), including the Weatherization Assistance Program and the Limited Income Energy Efficiency Program through EmPOWER. These programs provide income-eligible customers with home energy audits and improvements to improve energy efficiency, reduce energy usage, and reduce costs.

Electric Universal Service Program

Program structure

The Electric Universal Service Program (EUSP), established pursuant to the Electric Customer Choice Act of 1999, provides low-income electric customers with bill assistance through benefit payments paid directly to the utility on the participant's behalf.[128] The benefit amount is based on the participant's gross household income, household size, electricity usage, and price of electricity. Beginning in fiscal 2025, the program divides participants into seven groups, as shown in Table 18.[129]

[126] Maryland Public Utilities Article, §4–309(b), available at: https://mgaleg.maryland.gov/2024RS/Statute_Web/gpu/gpu.pdf

[127] Maryland Public Utilities Article, §4–309(e), available at: https://mgaleg.maryland.gov/2024RS/Statute_Web/gpu/gpu.pdf

[128] Public Service Commission of Maryland (PSC). 2024. Electric Universal Service Program – 2023 Annual Report, p. 1, 18. https://www.psc.state.md.us/wp-content/uploads/2023-PSC-EUSP-Report_FINAL_01.23.2024.pdf.

[129] Maryland PSC, 2024. Electric Universal Service Program – 2023 Annual Report, p. 5. [130] Maryland PSC, 2024. Electric Universal Service Program – 2023 Annual Report, p. 26.

Table 18. EUSP income levels

Group/poverty Level	Household income
Level 1	0–25% FPL
Level 2	26–50% FPL
Level 3	51–100% FPL
Level 4	101–150% FPL
Level 5	151–200% FPL
Level 6	Subsidized housing occupants
Level 7	Categorically eligible households that exceed 200% FPL

The benefit amount is calculated based on a formula to ensure that households with the lowest income and the highest-usage customers receive the greatest benefit:[130]

EUSP Benefit = Annual kWh Usage x Average Cost per kWh x Utility Index x Poverty Level Percentage

The Office of Home Energy Programs (OHEP) administers the EUSP and is required to file an Operations Plan for approval by the Maryland PSC for each fiscal year. Twenty local administering agencies throughout the state receive and process EUSP applications, which can be submitted through mail, email, fax, drop-offs, in-person interviews and outreach events, or an online portal.[131]

Eligibility

EUSP is available to households with incomes up to 200 percent of the federal poverty line, subsidized housing occupants, and categorically eligible households.[132] For 2025, the 200 percent FPL threshold corresponds to:[133]

- $31,300 for a one-person household
- $42,300 for a two-person household
- $53,300 for a three-person household
- $64,300 for a four-person household
- $75,300 for a five-person household
- $86,300 for a six-person household
- $97,300 for a seven-person household
- $108,300 for an eight-person household

[130] Maryland PSC, 2024. Electric Universal Service Program – 2023 Annual Report, p. 26.

[131] Maryland PSC, 2024. Electric Universal Service Program – 2023 Annual Report, p. 18.

[132] Maryland PSC, 2024. Electric Universal Service Program – 2023 Annual Report, p. 5.

[133] HHS, Office of the Assistant Secretary for Planning and Evaluation. Poverty Guidelines – Chart showing different multiples for the poverty guidelines for 2025. https://aspe.hhs.gov/sites/default/files/documents/df03c95bc141ef99b4caf28b7e9e4d00/detailed-guidelines-2025.xlsx; LIHEAP Clearinghouse. 2024. State Median Income (SMI) by Household Size for Optional Use in federal Fiscal Year (FY) 2024 and Mandatory Use in LIHEAP for FY25—Households of Size 7 through 12. https://acf.gov/sites/default/files/documents/ocs/COMM_LIHEAP_IM%202024-02_Att4SMITable_0.pdf.

Households that participate in TANF, SSI, SNAP, and means-tested veterans' programs are categorically eligible. Since 2024, categorically eligible households have been automatically enrolled in EUSP and other OHEP energy assistance programs for which they qualify.[134] The automatic enrollment of categorically eligible households is enabled by the state's MDTHINK Eligibility & Enrollment system, which records data for participants of social services programs.[135]

Funding

The EUSP is funded by a combination of ratepayer funds (through the Universal Services Benefit Program Ratepayer Surcharge) and Regional Greenhouse Gas Initiative (RGGI)/ Strategic Energy Investment Fund (SEIF) funds (see Table 19).[136]

Table 19. EUSP funding source and amount by year – FY 2020-2023

Year	FY 2020	FY 2021	FY 2022	FY 2023
Ratepayer funding	$30.9 million	$30.9 million	$27.5 million	$30.7 million
RGGI/SEIF and other funding	$10.4 million	$19.9 million	$33.4 million	$59.7 million
Total benefit expenditures	**$41.3 million**	**$41.8 million**	**$60.9 million**	**$90.4 million**

Source: PSC. 2024. Electric Universal Service Program – 2023 Annual Report, p. 15.

Program performance

Table 20 shows EUSP participation and benefit per household by year.

Table 20. EUSP participation and benefit per household by year

Year	FY 2020	FY 2021	FY 2022	FY 2023
Households served	84,079	83,702	79,951	96,367
Average benefit per household	$492	$504	$763	$939

Source: PSC. 2024. Electric Universal Service Program – 2023 Annual Report, p. 15.

Several changes introduced by Maryland House Bill 323 of 2023, including categorical eligibility and automatic enrollment, have improved the reach of OHEP's energy assistance programs, including EUSP

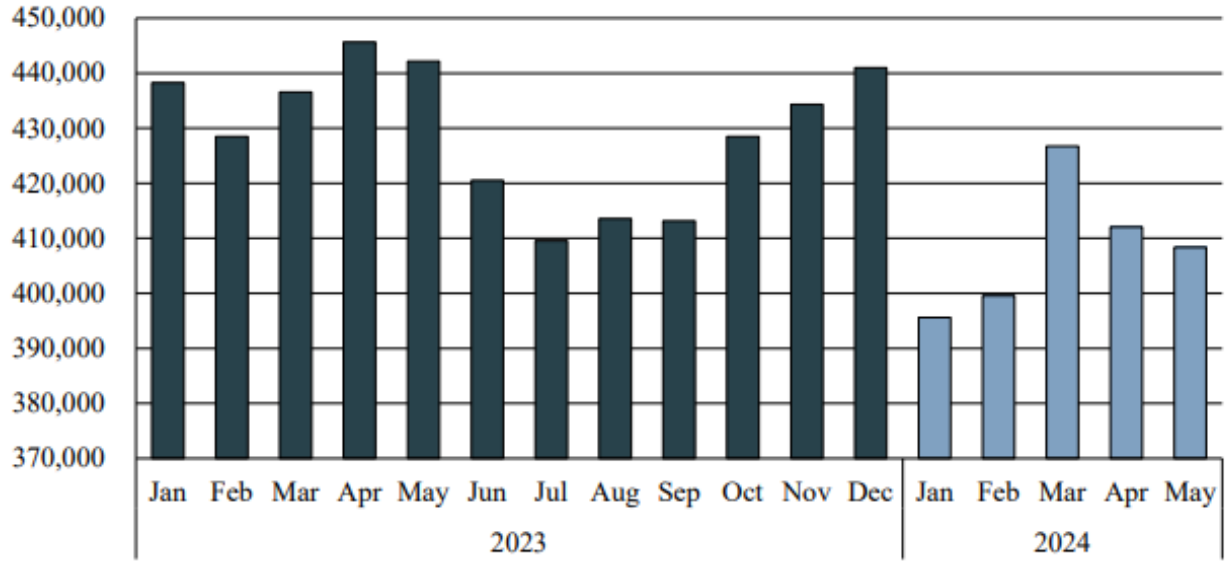
[134] Brock, E., V. Martinez, S. Quist, et al. 2025. "Evaluation of the Office of Home Energy Programs." Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. https://dls.maryland.gov/pubs/prod/ProgEval/EvalofOHEP.pdf.

[135] Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. 2025. Evaluation of the Office of Home Energy Programs, p. 11.
See also myMDTHINK website. https://mymdthink.maryland.gov/home/#/[136] Maryland PSC. 2024. Electric Universal Service Program – 2023 Annual Report, p. 8; Maryland PSC. Energy Assistance in Maryland. https://www.psc.state.md.us/wp-content/uploads/Energy-Assistance-in-Maryland-Fact-Sheet-1.pdf.

[136] Maryland PSC. 2024. Electric Universal Service Program – 2023 Annual Report, p. 8; Maryland PSC. Energy Assistance in Maryland. https://www.psc.state.md.us/wp-content/uploads/Energy-Assistance-in-Maryland-Fact-Sheet-1.pdf.

and MEAP (discussed below).[137] A report from the Maryland General Assembly's Office of Program Evaluation and Government Accountability found that, compared to before categorical eligibility was implemented, the number of applications have dramatically increased and denial rates have dramatically decreased.[138] However, the increased enrollment has required OHEP to lower the amount of benefits provided to each household in order to ensure that all eligible households receive benefits within the authorized budget.[139] Overall, the report showed that the implementation of House Bill 323 beginning January 2024 has reduced the number of customer accounts in arrears (see Figure 4).

Figure 4. Number of customer accounts in arrears in Maryland, January 2023 – May 2024



Source: Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. 2025. Evaluation of the Office of Home Energy Programs, p. 16.

Arrearage Retirement Assistance

Program structure

The Arrearage Retirement Assistance (ARA) program, also created by the Electric Customer Choice Act of 1999, provides grants to help customers pay down their past-due utility bills. Electric customers can

[137] Brock, E., V. Martinez, S. Quist, et al. 2025. "Evaluation of the Office of Home Energy Programs." Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. https://dls.maryland.gov/pubs/prod/ProgEval/EvalofOHEP.pdf, p. 9.

[138] Brock, E., V. Martinez, S. Quist, et al. 2025. "Evaluation of the Office of Home Energy Programs." Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. https://dls.maryland.gov/pubs/prod/ProgEval/EvalofOHEP.pdf, p. 11, 13.

[139] Brock, E., V. Martinez, S. Quist, et al. 2025. "Evaluation of the Office of Home Energy Programs." Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. https://dls.maryland.gov/pubs/prod/ProgEval/EvalofOHEP.pdf, p. 14.[140] OHEP. Energy Assistance Application. https://dhs.maryland.gov/documents/DHS%20Forms/FIA%20Forms/English/OHEP/OHEP2025Application%20-%20Fillable.pdf.

receive up to $2,000 in a five-year period, and gas customers can receive up to $1,000 in a five-year period.[140] The ARA program is administered by OHEP. Eligible residents can apply for ARA benefits as part of the same application for EUSP and other energy assistance programs.

Eligibility

Customers who have a past-due bill of $300 or greater and receive EUSP benefits (for electric customers) or Maryland Energy Assistance Program benefits (for gas customers, as described below) are eligible for the ARA program.[141] Residents with medical vulnerabilities can receive ARA grants multiple times within a five-year period.[142]

Funding

As shown in Table 21, the Electric ARA program is mainly funded through SEIF funding but has been supplemented with ratepayer funding in some years:[143]

Table 21. Electric ARA funding sources by year

Year	FY 2020	FY 2021	FY 2022	FY 2023
Ratepayer Funding	-	$0.5 million	$1.2 million	-
RGGI/SEIF and Other Funding	$9.5 million	$18.1 million	$19.5 million	$32.9 million
Total Benefit Expenditures	**$9.5 million**	**$18.6 million**	**$20.7 million**	**$32.9 million**

The Gas ARA program is funded through LIHEAP.[144] Funding information for the Gas ARA program was unavailable.

Program performance

Table 22 below shows participation and benefits per household for the Electric ARA program.[145]

Table 22. Electric ARA participation and benefit per household by year

Year	FY 2020	FY 2021	FY 2022	FY 2023
Households Served	12,218	17,774	20,792	29,376
Average Benefit per Household	$779	$1047	$997	$1,123

[140] OHEP. Energy Assistance Application. https://dhs.maryland.gov/documents/DHS%20Forms/FIA%20Forms/English/OHEP/OHEP2025Application%20-%20Fillable.pdf.

[141] OHEP. Energy Assistance Application. https://dhs.maryland.gov/documents/DHS%20Forms/FIA%20Forms/English/OHEP/OHEP2025Application%20-%20Fillable.pdf.

[142] 2025 LIHEAP Detailed Model Plan, p. 10.

[143] Maryland PSC. 2024. "Electric Universal Service Program – 2023 Annual Report." p. 15.

[144] Maryland PSC. Energy Assistance in Maryland. https://www.psc.state.md.us/wp-content/uploads/Energy-Assistance-in-Maryland-Fact-Sheet-1.pdf.

[145] Maryland PSC. 2024. "Electric Universal Service Program – 2023 Annual Report" p. 15.

Universal Service Protection Program

Program structure

The Universal Service Protection Program (USPP), established by the PSC in 1988 as required by statute, is designed to protect low-income customers from utility shutoffs during the heating season from November through March.[146] The program allows customers in arrears to avoid service termination or restore service if the customer enrolls in and makes timely payments under an equal payment plan (also known as "budget billing plan") for their outstanding arrearages and if outstanding arrearages are lowered to $400 or less prior to the winter heating season.[147] Utilities are required to publicize and offer the program before November of each year.

Eligibility

The USPP is available to customers who are eligible for and have applied for benefits under the Maryland Energy Assistance Program (MEAP).

Funding

The USPP does not provide funding to help pay down participants' arrearages.

Program performance

Table 23 shows USPP participation by program-year, along with the participation rate for each of those years.

Table 23. USPP participation by year

Heating season	2021-2022	2022-2023	2023-2024
Number of Participants	18,027	26,561	36,410
Participation Rate among Eligible Customers	45%	60%	59%

Source: PSC. 2024. Utility Service Protection Program Annual Report – Winter 2023-2024, p. 15.

Low-Income Home Energy Assistance Program / Maryland Energy Assistance Program

Program structure

Maryland implements the Low-Income Home Energy Assistance Program (LIHEAP) as the Maryland Energy Assistance Program (MEAP). It provides a one-time payment per heating season, sent to the fuel supplier (e.g., propane or oil vendors) or utility company on the participant's behalf. The regular benefit

[146] Maryland PSC. 2024. "Utility Service Protection Program Annual Report – Winter 2023–2024, p. 8-9. https://www.psc.state.md.us/wp-content/uploads/USPP-Annual-Report-for-Winter-2023-2024.pdf.

[147] PSC. 2024. Utility Service Protection Program Annual Report – Winter 2023-2024, p. 13. https://www.psc.state.md.us/wp-content/uploads/USPP-Annual-Report-for-Winter-2023-2024.pdf.

provided by the program ranges from $25 to $750 and is determined based on the participant's household income, fuel type, and area of residence.[148]

Crisis assistance is available to households that have no heat, a shortage of fuel supply, or an imminent utility shutoff during the winter. Crisis assistance is a fast-tracked regular benefit and does not normally include a separate benefit except if the regular benefit does not resolve an energy crisis, in which case the household can receive an additional crisis benefit between $100 and $600.[149]

OHEP administers MEAP under the Maryland Department of Human Services. Customers can apply for MEAP assistance through an online application on OHEP's website or a paper application mailed to OHEP's office. The MEAP application is combined with other energy assistance programs, including EUSP, ARA, Maryland Department of Housing and Community Development (DHCD) energy efficiency programs, and USPP.[150] Customers can also contact Local Home Energy Program Offices for guidance related to the energy assistance application.[151] Additionally, there is a streamlined application process for applicants aged 60 or older, as well as disabled applicants and critically ill applicants receiving benefits through Maryland's Critical Medical Needs Program.[152]

Eligibility

The income-eligibility thresholds for MEAP are 200 percent of FPL for households with up to 10 members and 60 percent of SMI for households with 11 or more members.[153] For 2025, these thresholds correspond to:[154]

- $31,300 for a one-person household
- $42,300 for a two-person household
- $53,300 for a three-person household
- $64,300 for a four-person household

[148] Maryland Department of Human Services, Office of Home Energy Programs. "How are Grants Determined?" https://dhs.maryland.gov/office-of-home-energy-programs/how-are-grants-determined/; 2025 LIHEAP Detailed Model Plan, p. 11. https://liheapch.acf.hhs.gov/docs/2025/state-plans/MD_Plan_2025.pdf.

[149] 2025 Low-Income Home Energy Assistance Program (LIHEAP) Detailed Model Plan, p. 16.

[150] Office of Home Energy Programs (OHEP). Energy Assistance Application. https://dhs.maryland.gov/documents/DHS%20Forms/FIA%20Forms/English/OHEP/OHEP2025Application%20-%20Fillable.pdf.

[151] OHEP. Local Home Energy Program Office/ https://dhs.maryland.gov/office-of-home-energy-programs/local-home-energy-program-office/.

[152] 2025 LIHEAP Detailed Model Plan, p. 10.

[153] Brock, E., V. Martinez, S. Quist, et al. 2025. "Evaluation of the Office of Home Energy Programs." Maryland General Assembly, Department of Legislative Services, Office of Program Evaluation and Government Accountability. https://dls.maryland.gov/pubs/prod/ProgEval/EvalofOHEP.pdf.

[154] HHS, Office of the Assistant Secretary for Planning and Evaluation. Poverty Guidelines – Chart showing different multiples for the poverty guidelines for 2025. https://aspe.hhs.gov/sites/default/files/documents/df03c95bc141ef99b4caf28b7e9e4d00/detailed-guidelines-2025.xlsx; LIHEAP Clearinghouse. 2024. State Median Income (SMI) by Household Size for Optional Use in federal Fiscal Year (FY) 2024 and Mandatory Use in LIHEAP for FY25—Households of Size 7 through 12. https://acf.gov/sites/default/files/documents/ocs/COMM_LIHEAP_IM%202024-02_Att4SMITable_0.pdf.

- $75,300 for a five-person household
- $86,300 for a six-person household
- $97,300 for a seven-person household
- $108,300 for an eight-person household
- $119,300 for a nine-person household
- $130,300 for a 10-person household
- $131,637 for an 11-person household
- $134,323 for a 12-person household

Categorical eligibility requirements are the same as those for EUSP, and categorically eligible customers are enrolled automatically.[155] For renters whose energy costs are included in their rent payments, MEAP benefits will be paid to the landlord, who will reduce the rent accordingly.[156] In addition, applicants living in subsidized housing must provide proof that they pay their own heating costs. Renters living in subsidized housing receive a lower benefit, given that a utility allowance is incorporated into their subsidy.[157]

Funding

Table 24. LIHEAP federal funding and benefits amount – Maryland

Year	FY 2020	FY 2021	FY 2022	FY 2023
Total program funding	$99,434,666	$176,810,832	$159,065,751	$128,971,904
Heating benefits	$57,826,867	$79,095,762	$125,315,677	$76,852,451
Cooling benefits	$2,396,580	$1,272,001	$0	$0
Crisis benefits	$3,973,162	$2,286,358	$3,747,711	$3,085,642
Weatherization benefits	$0	$4,428,923	$16,000,000	$0
Total benefits	**64,196,609**	**$87,083,044**	**$145,063,388**	**$79,938,093**

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Program performance

The PSC submits annual reports to the Maryland General Assembly on all bill assistance and arrearage retirement programs, including MEAP and other programs discussed below. The reports rely on data supplied by OHEP and can be found on the PSC's website.[158] See Table 25 through Table 27 for details.

[155] 2025 LIHEAP Detailed Model Plan, p. 5.

[156] 2025 LIHEAP Detailed Model Plan, p. 9.

[157] 2025 LIHEAP Detailed Model Plan, p. 9.

[158] https://www.psc.state.md.us/. The reports can be found by searching for "EUSP annual report" using the website's search bar.

Table 25. Number of households receiving federally funded LIHEAP benefits – Maryland

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	88,639	86,274	82,046	96,798
Cooling benefits	4,062	2,874	0	0
Crisis benefits	4,939	4,200	4,195	3,008

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 26. Percent of income-eligible households served by federally funded LIHEAP benefits – Maryland

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating Benefits	14.436%	13.954%	13.139%	15.953%
Cooling Benefits	0.662%	0.465%	0%	0%
Crisis Benefits	0.804%	0.679%	0.672%	0.496%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 27. Average LIHEAP benefits per participating household – Maryland

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	$652	$513	$851	$826
Cooling benefits	$590	$504	$0	$0
Crisis benefits	$248	$510	$860	$910

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Weatherization Assistance Program

Program structure

WAP provides income-eligible homeowners and renters with energy audits and energy improvements to reduce energy use and lower energy costs. The weatherization measures provided include blower door air infiltration reduction; insulation in the attic, floors, and walls; hot water system improvements; lighting retrofit; furnace clean/tune, safety repairs, burner retrofit or replacement; and other health and safety items.[159]

OHEP and DHCD administer the program, and local weatherization agencies throughout the state program handle program applications and provide program services.[160]

Eligibility

The income threshold is 200 percent of FPL or 60 percent of the SMI, whichever is higher.[161] Priority is given to residents aged 60 and above, those with disabilities, those with children in the home, and

[159] Maryland Department of Housing and Community Development (DHCD). Weatherization Assistance Program. https://dhcd.maryland.gov/Energy-Home-Repair/Pages/Homeowner-Grants/WAP.aspx.

[160] DHCD. Local Weatherization Agencies (LWAs) for the Weatherization Assistance Program. https://dhcd.maryland.gov/Energy-Home-Repair/Documents/WAP/LocalWeatherizationAgenciesContacts.pdf.

[161] 2025 LIHEAP Detailed Model Plan, p. 18; DHCD. Weatherization Assistance Program. https://dhcd.maryland.gov/Energy-Home-Repair/Pages/Homeowner-Grants/WAP.aspx.

households with high energy usage and/or energy burden. Also, households that receive SSI, TANF, SNAP, U.S. Department of Housing and Urban Development housing assistance, or MEAP benefits are automatically eligible.[162]

Funding

The program is funded through a mixture of LIHEAP and U.S. Department of Energy funds. LIHEAP funding amounts are included in Table 24 above. The state's allocation of federal WAP funds for fiscal 2024 was $3,057,092.[163]

Program performance

Table 28 breaks out the number and percentage of income-eligible households receiving LIHEAP-funded WAP benefits for each fiscal year from 2020 through 2023.

Table 28. Households receiving LIHEAP-funded WAP benefits – Maryland

Year	FY 2020	FY 2021	FY 2022	FY 2023
Number of households	0	7	257	336
Percent of income-eligible households	0%	0.001%	0.041%	0.055%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Data on average benefits per participant are not available.

EmPOWER Limited Income Energy Efficiency Program

Program structure

The EmPOWER Limited Income Energy Efficiency Program (LIEEP) was created by the EmPOWER Maryland Energy Efficiency Act of 2008 and provides limited-income households with home audits and installation of materials and equipment to improve energy efficiency and reduce energy use, at no cost for the program participant.[164] For the 2024–2026 program cycle, the program is designed to meet the state's goals to reduce limited-income electric retail sales by 0.53 percent in 2024, 0.72 percent in 2025, and 1 percent in 2026.[165] The program includes two core components:

[162] DHCD. Weatherization Assistance Program. https://dhcd.maryland.gov/Energy-Home-Repair/Pages/Homeowner-Grants/WAP.aspx.

[163] U.S. Department of Energy (DOE). 2024. Weatherization Program Notice 24-2: Program Year (PY) 2024 Grantee Allocations. https://www.energy.gov/sites/default/files/2024-04/wap-wpn-24-2_041024.pdf.

[164] Maryland Energy Administration. EmPOWER Maryland. https://energy.maryland.gov/pages/facts/empower.aspx; DHCD. EmPOWER Maryland Limited Income Energy Efficiency Program. https://dhcd.maryland.gov/Energy-Home-Repair/Pages/Homeowner-Grants/EmPOWER.aspx.

[165] DHCD. 2023. EmPOWER Maryland Limited Income Program – Program Plan. https://dhcd.maryland.gov/Energy-Home-Repair/Documents/EmPOWER/DHCD-Limited-Income-Program-Plan.pdf.

- **Whole Home Efficiency:** Directly install energy efficiency improvements in participants' homes through qualified contracted service providers or through grants or loans for property owners.
- **Base Efficiency:** Provide limited selection of energy efficiency measures (excluding building shell measures) for customers deferred from the Whole Home Efficiency program due to their home condition.

The DHCD administers the LIEEP program using a network of competitively selected local service providers.[166] Eligible households can apply for the program through an online application or by submitting or mailing a paper application to the DHCD office.[167]

Eligibility

For single-family households, the income threshold is 250 percent of FPL or 80 percent of AMI, whichever is higher. Households can also be deemed categorically eligible if they participate in SNAP/food assistance, TANF/TCA, Medicaid, the Maryland Fuel Fund, Social Security, EUSP, DHCD Rehab Programs, the Baltimore Lead Hazard Control Program, Healthy Homes for Healthy Kids, or the MEA LMI Energy Efficiency Grant. For multifamily properties, a minimum of 20 percent of households must be at or below the 80 percent of AMI threshold; all units within an eligible property can receive services.[168]

Beginning in the 2024–2026 program cycle, individual participants who live in certain disadvantaged communities can self-attest their income to determine eligibility for the LIEEP program.[169]

Funding

The EmPOWER LIEEP program is part of the EmPOWER Maryland portfolio, which also includes utility-administered energy efficiency programs serving non-low-income residential customers and commercial customers.[170] All EmPOWER Maryland programs are funded by utility ratepayers, including both electric and gas customers, with program budgets approved by the PSC. Table 29 shows program costs for 2021–2023.

Table 29. LIEEP 2021–2023 program costs

Year	2021	2022	2023
Program costs	$10.8 million	$26.5 million	$24.2 million

[166] DHCD. Resources for Network Partners. https://dhcd.maryland.gov/Energy-Home-Repair/Pages/Energy-Efficiency-Workforce/Resources.aspx.

[167] DHCD. EmPOWER Maryland Limited Income Energy Efficiency Program.

[168] DHCD. 2023. EmPOWER Maryland Limited Income Program – Program Plan, p. 32-33.

[169] DHCD. 2023. EmPOWER Maryland Limited Income Program – Program Plan, p. 34.

[170] Maryland Office of People's Counsel. EmPOWER Programs. https://opc.maryland.gov/Consumer-Learning/Energy-Bill-Savings/EmPOWER-Programs

The program budget for the 2024–2026 program cycle is shown in Table 30.[171]

Table 30. LIEEP 2024–2026 approved budget

Year	2024	2025	2026	Total
Incentive costs	$63,501,970	$95,089,833	$141,970,081	$300,561,884
Total costs	$72,069,901	$108,145,727	$161,145,936	$341,361,564

Program performance

The PSC submits annual reports on the EmPOWER Maryland portfolio to the Maryland General Assembly. The reports can be found on the PSC's website as well as on the Maryland State Archives website.[172] See Table 31 for details on properties served and energy savings per participant.

Table 31. LIEEP participants and energy savings by year

Year	2021	2022	2023
Single-family homes served	1,500	21,000	14,000
Multifamily properties served	152	2,200	2,500
Average energy savings per participant	1,784 kWh	964 kWh	478 kWh

Sources: Maryland PSC. 2022. The EmPOWER Maryland Energy Efficiency Act Report of 2022, p. 12. https://www.psc.state.md.us/wp-content/uploads/2022-EmPOWER-Maryland-Energy-Efficiency-Act-Standard-Report.pdf; PSC. 2023.

Illinois

Illinois' portfolio of energy assistance programs includes bill assistance programs comprising the Low-Income Home Energy Assistance Program and the Percentage of Income Payment Plan program, low-income discount rates, Weatherization Assistance Program, and arrearage reduction programs.

Illinois has enacted legislation outlining the state's approach to energy affordability. Illinois defines unaffordable energy bills as those that exceed 6 percent of household income.[173] Per the Energy Assistance Act, the state declares that "society benefits if essential utility services are affordable and arrearages and disconnections are minimized for those most in need."[174] After being signed into legislation in 2021, the Climate and Equitable Jobs Act required the Illinois Commerce Commission (ICC) to conduct a comprehensive study and report assessing the potential for low-income discount rates for

[171] DHCD. 2023. EmPOWER Maryland Limited Income Program – Program Plan, p. 50.

[172] Maryland State Archives. Public Service Commission – Reports (Mandated). https://msa.maryland.gov/msa/mdmanual/25ind/html/62pubsr.html.

[173] 305 ILCS 20/18(c), available at: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1416&ChapterID=28.

[174] 305 ILCS 20/2(a), available at: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1416&ChapterID=28.

residential electric and natural gas utility customers, after which the ICC was granted authority to file a tariff establishing said discount rates.[175]

Affordability programs in Illinois include referrals to energy efficiency programs. As part of the electric utility Commonwealth Edison Company's (ComEd) 2022–2025 Energy Efficiency programs quarterly reports, ComEd reports the number and percentage of customers receiving utility bill assistance that were referred to energy efficiency programs. Local Administering Agencies (LAA) offer energy efficiency kits and energy efficiency program information to participants in LIHEAP and other energy assistance programs.[176] Conversely, customers who participate in ComEd's single-family and multifamily low-income energy efficiency retrofit programs or receive energy saving kits through the income-eligible program channel receive referrals to financial assistance programs in the form of brochures or as part of energy savings assessment reports.[177] In its quarterly reports, ComEd tracks participant referrals by program and ZIP code. [178] ComEd also targets energy efficiency offerings to communities with high rates of shutoffs.[179]

Illinois has a deregulated electricity market, and thus generation charges are separate from distribution charges on customer bills. ComEd is the state's largest electric utility, followed by Ameren Illinois Company (Ameren Illinois).

Percentage of Income Payment Plan

Program structure

Illinois established the Percentage of Income Payment Plan (PIPP) program for utility customers by state statute in 2009.[180] The goal of PIPP is to make energy costs more affordable for low-income households by capping monthly utility payments at a fixed percentage of a customer's income. Illinois' PIPP is designed to limit the amount participating customers pay towards gas and electric utility bills to no more than 6 percent of their gross income. To cover the remainder, participants receive a monthly credit to cover the rest of their utility bill. Participants are also automatically enrolled in "Budget Billing," which helps stabilize energy costs by setting a fixed monthly payment amount.[181] In addition, the PIPP

[175] Illinois Compiled Statutes. 220 ILCS 5/9-241. Available at: https://www.ilga.gov/legislation/ILCS/details?MajorTopic=REGULATION&Chapter=UTILITIES&ActName=Public%20Utilities%20Act.&ActID=1277&ChapterID=23&ChapAct=220+ILCS+5%2F&SeqStart=17600000&SeqEnd=22900000.

[176] ComEd. "CY2024 Fourth Quarter Report." Page 19. Available at: https://www.ilsag.info/wp-content/uploads/CY2024-Q4-ComEd-EE-Report.pdf.

[177] ComEd. CY2024 Fourth Quarter Report. Page 21. Available at: https://www.ilsag.info/wp-content/uploads/CY2024-Q4-ComEd-EE-Report.pdf.

[178] ComEd. CY2024 Fourth Quarter Report. Pages 21-23. Available at: https://www.ilsag.info/wp-content/uploads/CY2024-Q4-ComEd-EE-Report.pdf.

[179] ComEd. CY2024 Fourth Quarter Report. Page 24. Available at: https://www.ilsag.info/wp-content/uploads/CY2024-Q4-ComEd-EE-Report.pdf.

[180] 305 ILCS 20/18. Available at: https://www.ilga.gov/legislation/ilcs/documents/030500200K18.htm.

[181] IL DCEO. 2019. "PIPP Brochure." Available at: https://dceo.illinois.gov/content/dam/soi/en/web/dceo/communityservices/utilitybillassistance/documents/pipp-brochure-2019.pdf.

includes an ARP, under which customers receive a one-twelfth reduction in previous overdue payments for each on-time monthly payment they make.[182,183]

The maximum PIPP benefit per customer is $1,800 per year, with a maximum limit of $150 per month ($100 allocated per month for the participant's natural gas bill and $50 for the electric bill). If a household's energy costs exceed this limit, the participant must cover the difference, which may result in some customers paying more than 6 percent of their income.

Eligibility

PIPPs are available for customers of ComEd, Ameren Illinois, Northern Illinois Gas Company (Nicor Gas), and Peoples Gas Light & Coke Company (Peoples Gas). Eligible customers are determined the same way as LIHEAP: up to 200 percent of FPL. Customers can choose whether to participate in LIHEAP or PIPP; they cannot participate in both programs at once.[184]

Funding

Funding for the PIPP comes from the state's Supplemental Low-Income Energy Assistance Fund (SLIHEAF), recovered by a surcharge on electric and gas utility customers' bills called the Energy Assistance Charge (EAC).[185,186] Funds from SLIHEAF support the state's PIPP program as well as the LIHEAP and weatherization programs. As of January 2025, the base EAC amount is $0.64 per month for residential customers, $6.40 per month for nonresidential customers with peak demand less than 10 MW, and $240 per month for large nonresidential customers with peak demand greater than 10 MW.[187]

Table 32 presents the funds issued to PIPP participants for the last three program years.

[182] LIHEAP Clearinghouse. "Illinois." Updated November 2016. Available at: https://liheapch.acf.hhs.gov/dereg/states/illinois.htm.

[183] Illinois Commerce Commission. Low Income Discount Rate Study Report to the Illinois General Assembly. December 2022. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf p. 25.

[184] IL DCEO. 2019. "PIPP Brochure." Available at: https://dceo.illinois.gov/content/dam/soi/en/web/dceo/communityservices/utilitybillassistance/documents/pipp-brochure-2019.pdf.

[185] Illinois Commerce Commission. Low Income Discount Rate Study Report to the Illinois General Assembly. December 2022. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf p. 23.

[186] 305 ILCS 20/13. "Energy Assistance Act." Available at: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1416&ChapterID=28.

[187] ComEd "Energy Assistance Charge for the Supplemental Low-Income Energy Assistance Fund." Available at: https://www.comed.com/cdn/assets/v3/assets/blt3ebb3fed6084be2a/blt31e1554f825daf58/6762f30e11bd6561db715f54/95_RCA-Low_-Income-Info-Sheet-41-20241218.pdf?branch=prod_alias.

Table 32. Spending on PIPP program by program year

Year	PY 2022	PY 2023	PY 2024
PIPP spending	$38,700,000	$43,458,715	$32,623,369

Source: Illinois Department of Commerce and Economic Opportunity. Report on the Results of Operations: Program Year 2022. Available at: https://dceo.illinois.gov/content/dam/soi/en/web/dceo/aboutdceo/reportsrequiredbystatute/illinois-energy-assistance-programs-py22-report.pdf; Illinois Department of Commerce and Economic Opportunity. Report on the Results of Operations: Program Year 2024. September 2024. Available at: https://dceo.illinois.gov/content/dam/soi/en/web/dceo/aboutdceo/reportsrequiredbystatute/illinois-energy-assistance-programs-py24-report-on-the-results-of-operations.pdf.

Program performance

PIPPs can promote long-term financial stability by encouraging regular payments and offering arrearage reduction. However, the program's long-term commitment requirement may deter customers facing immediate financial hardship, who may opt for the one-time LIHEAP payment instead. Conversely, ComEd notes that customers participating in ComEd's PIPP are more successful in staying current on their bills than those who only elect to receive the one-time LIHEAP payment.[188]

In July 2008, Illinois conducted a PIPP pilot that served 975 Ameren Illinois customers and lasted through May 2009.[189] In an impact evaluation of the pilot program, prepared for the Illinois Department of Commerce and Economic Opportunity (DCEO), APPRISE found that the PIPP Pilot "was effective in lowering the energy burden for most participating clients and substantially improved the energy security of most clients."[190] However, the study team recommended that the PIPP program incentivize customers to make regular payments on their bill, for example through programs that forgive arrearages for making payments. Utilities should also maintain regular communication with customers on their expectations of payment. Table 33 presents the PIPP participants and dollars of assistance provided by utility to PIPP participants, as reported by the utilities in 2022. ComEd, which serves the greater Chicago region, enrolls the most customers in the PIPP. Across all utilities in the state, the average PIPP assistance provided per customer was $701 in 2022.

[188] Illinois Commerce Commission. Low Income Discount Rate Study Report to the Illinois General Assembly. December 2022. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf. p. 25.

[189] Applied Public Policy Research Institute for Study and Evaluation (APPRISE). 2009. Illinois PIPP Program Impact Evaluation. Prepared for the Illinois Department of Commerce and Economic Opportunity. Available at: https://www.appriseinc.org/reports/Illinois%20PIPP%20Impact%20Report%20-%20FINAL.pdf.

[190] Ibid.

Table 33. PIPP participants and PIPP assistance provided in 2022 by utility

Utility — Utility Service	PIPP Participants	PIPP Assistance
Ameren — Combination	8,674	$9,201,657
Ameren — Gas	59	$2,349,236
Ameren — Electric	3,618	$24,127
ComEd — Electric*	29,997	$14,764,614
Nicor Gas	7,451	$4,716,744
North Shore — Gas	209	$100,019
Peoples Gas	11,307	$11,826,340
Total	**61,315**	**$42,982,737**

Source: Illinois Commerce Commission. Low Income Discount Rate Study Report to the Illinois General Assembly. December 2022. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf p. 12.

Low-income discount rate

Program structure

As required by the Climate and Equitable Jobs Act (Public Act 102-0062) and State statute, and after conducting a study of the potential for low-income discount rates, the ICC directed electric and gas utilities with more than 3 million residential delivery service customers in Illinois to offer a low-income discount rate (LIDR).[191] In 2023, the ICC ordered the gas utilities, noted in the table below, to establish five-tier low-income discount rates for eligible natural gas customers.[192] The gas utilities launched their LIDR program in October 2024, and ComEd and Ameren electric are set to launch similar LIDR programs in 2025.[193] The LIDR provides percentage discounts to eligible customers based on their income. Participants receive a set percentage discount on their bills, depending on their income level. Table 34 lists the monthly discounts by income tier for the natural gas utility LIDR. The approved methodology for the electric utility programs follows a similar approach as for the gas utilities.[194]

[191] Illinois Environmental Projection Agency. 2021. Climate and Equitable Jobs Act. Available at https://epa.illinois.gov/content/dam/soi/en/web/epa/topics/ceja/documents/102-0662.pdf.

[192] Illinois Commerce Commission, Utility Energy Assistance, https://icc.illinois.gov/consumers/utility-energy-assistance.

[193] Illinois Commerce Commission. 2024 Annual Report on Electricity, Gas, Water and Sewer Utilities. January 2025. Available at: https://www.ilga.gov/reports/ReportsSubmitted/5522RSGAEmail11861RSGAAttach2024%20Electricity%20Gas%20Water%20Sewer%20Utilities%20Annual%20Report.pdf, p. 41.

[194] Illinois Commerce Commission. Docket 24-0163. Final Order, p. 41. March 27, 2025. Available at: https://icc.illinois.gov/docket/P2024-0163/documents/363172/files/635979.pdf.

Table 34. Discount percentage by tier for natural gas utility low-income discount rates

Tier *(% of FPL)*	Tier 1 *0–50%*	Tier 2 *51–100%*	Tier 3 *101–150%*	Tier 4 *151–200%*	Tier 5 *201–300%*
Peoples Gas	83%	68%	45%	20%	5%
North Shore Gas	79%	60%	36%	12%	5%
Nicor Gas	75%	55%	25%	10%	5%
Ameren Illinois Gas	75%	55%	25%	10%	5%

Source: Citizens Utility Board. 2024. CUB Q&A: The Low-Income Discount Rate (LIDR) program. Available at https://www.citizensutilityboard.org/blog/2024/10/04/cub-qa-the-low-income-discount-rate-lidr-program/

Eligibility

Customers with incomes up to 300 percent of FPL as set forth by the U.S. Department of Health and Human Services are eligible for the LIDR. Table 35 presents the five income tiers.

Table 35. Income eligibility thresholds by tier for LIDR program

Tier	Income threshold	1-person household	2-person household	3-person household	4-person household
Tier 1	0 to 50% FPL	$7,536	$10,224	$12,912	$15,600
Tier 2	51% to 100% FPL	$15,060	$20,436	$25,824	$31,200
Tier 3	101% to 150% FPL	$22,596	$30,660	$38,736	$46,800
Tier 4	151% to 200% FPL	$30,120	$40,884	$51,636	$62,400
Tier 5	Up to 300% FPL	$45,180	$61,320	$77,460	$93,600

Calculated by multiplying the monthly income threshold by 12 to get annual income threshold. Source: Citizens Utility Board. 2024. CUB Q&A: The Low-Income Discount Rate (LIDR) program. Available at https://www.citizensutilityboard.org/blog/2024/10/04/cub-qa-the-low-income-discount-rate-lidr-program/

Most customers will enroll and certify their eligibility annually through Local Administering Agencies (LAA) at the same time as they apply for LIHEAP and/or the PIPP. Customers who already have a low-income customer flag on their account will automatically be enrolled in the LIDR program.

Customers with incomes that fall under Tier 5 do not qualify for LIHEAP but can still receive a discount. Tier 5 customers will have the option to self-certify to verify their income is less than 300 percent of FPL. ComEd will conduct a limited audit for those customers in Tier 5 who self-certify. Once enrolled, customers will need to recertify their eligibility periodically. Customers will remain in their current tier until they are required to recertify with the LIHEAP and PIPP programs.

Funding

The LIDR programs are funded by a charge on gas or electric bills for residential, commercial, and industrial customers.[195] The costs of the LIDR will be recovered through an annual Rider LIDR

[195] Citizens Utility Board. "CUB Q&A: The Low-Income Discount Rate (LIDR) program." October 4, 2024. Available at: https://www.citizensutilityboard.org/blog/2024/10/04/cub-qa-the-low-income-discount-rate-lidr-program/.

reconciliation docket, and the costs of administering the program will be recovered through ComEd's Multi-Year Integrated Rate Plan (MYIRP).

Program performance

As these are recently implemented or yet-to-be launched programs, there is no performance data available at the time of this report.[196,197]

Supplemental Arrearage Reduction Program

Program structure

In addition to the ARP offered to PIPP and LIHEAP participants, Illinois authorizes utilities to offer a Supplemental Arrearage Reduction Program (SARP).[198] The first and only Illinois utility with a SARP, ComEd launched its SARP program in late 2019. Through SARP, ComEd provides a monthly arrearage credit equal to one-twelfth of the arrearage amount, while encouraging customers to implement energy efficiency.[199] Once enrolled, SARP participants are automatically placed on Budget Billing, and ComEd provides arrearage forgiveness credits for each on-time, full monthly payment made.[200]

Eligibility

The SARP is intended for customers who cannot become ARP participants "due to PIPP timing or funding constraints."[201] ComEd customers who receive LIHEAP benefits and have an arrearage balance of at least $100 are eligible to apply for the SARP. To confirm eligibility, ComEd verifies that customers are receiving LIHEAP assistance and have an outstanding balance meeting the minimum threshold. No additional documentation is required for enrollment.

Funding

Utilities may use funds collected from customers through the SLIEAF fund to support additional energy assistance offerings, including ComEd's SARP.[202]

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[196] North Shore & People's Gas is the first program to file an implementation report, however no current program participation or performance data has been reported. *See* North Shore Gas Company and Peoples Gas Company. Rider LIDEA System Savings Report. June 30, 2025. https://icc.illinois.gov/docket/P2023-0068/documents/367305.

[197] *See* Docket 23-0066 (Nicor Gas), available at: https://icc.illinois.gov/docket/P2023-0066/documents/344366/files/601330.pdf; Docket 23-0067 (Ameren Gas), available at: https://icc.illinois.gov/docket/P2023-0067/documents

[198] 305 ILCS 20/18. "Energy Assistance Act." Available at: https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1416&ChapterID=28.

[199] Illinois Commerce Commission. Low Income Discount Rate Study Report to the Illinois General Assembly. December 2022. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/icc-reports/low-income-discount-rate-study-report-2022-12-15.pdf p. 23.

[200] Id., p. 59.

[201] 305 ILCS 20/18(b) 5.5. Energy Assistance Act." https://www.ilga.gov/Legislation/ILCS/Articles?ActID=1416&ChapterID=28#.

[202] Id., p. 23.

Program performance

There have not been any evaluations of the SARP program by ComEd or another entity to date. In comments to the ICC, ComEd states that as of 2022, ComEd has 13,102 customers participating in SARP and has provided $1,979,330 in assistance.[203] This results in an average of $151 of assistance per participant for SARP in 2022. ComEd notes that there is opportunity to expand SARP and PIPP to reach more customers: historically, ComEd has provided $3.4 million in arrearage forgiveness credits through both PIPP and SARP in a year, even though approximately $7 million has been available to use between both programs.[204]

Low-Income Home Energy Assistance Program

Program structure

In Illinois, LIHEAP is administered by the DCEO and provides heating assistance for both gas and electric customers. As in other states, administrators pay LIHEAP benefits to the utility or energy supplier on the participant's behalf. Renters with utilities included in their rent receive a cash benefit instead.[205]

The regular benefit amount is determined based on a benefit matrix. The amount ranges from $315 to $2,075 depending on the participant's household income, household size, and fuel type.[206] Crisis assistance is also available to households experiencing or facing disconnection from utility service, providing the minimum amount needed to restore service, up to $1,500 per year.

Customers can fill out a Request for Services on DCEO's Help Illinois Families website, after which local administering agencies will reach out to the applicant to complete the application.[207] Residents aged 60 or older, individuals with a disability, families with children 5 years old and under, households disconnected or about to be disconnected from utility service, and households with propane tanks less than 25 percent full can start applying for LIHEAP assistance starting October 1, while all other income-eligible households can start applying on November 1.[208]

[203] Id., p. 12.

[204] Commonwealth Edison Company. 2022. Response to Staff's June 24, 2022, Request for Feedback Regarding Low-Income Rate Programs. August 12. Available at: https://icc.illinois.gov/api/web-management/documents/downloads/public/Low%20Income%20Discount%20Rates/ComEd%20Low%20Income%20Rate%20Study%20Reply%20Comments%20to%20Staff%20FINAL.pdf. page 18.

[205] Illinois Department of Commerce and Economic Opportunity (DCEO). 2024-2025 LIHEAP State Plan, p. 9. https://dceo.illinois.gov/content/dam/soi/en/web/dceo/communityservices/utilitybillassistance/documents/py25-liheap-state-plan--submitted-detailed-model-plan-liheap-10.01.24.pdf.

[206] DCEO. 2024-2025 LIHEAP State Plan, p. 10.

[207] DCEO. Help Illinois Families. https://dceo.illinois.gov/communityservices/homeweatherization/communityactionagencies/helpillinoisfamilies.html.

[208] DCEO. Utility Bill Assistance – How to Apply. https://dceo.illinois.gov/communityservices/utilitybillassistance/howtoapply.html.

Eligibility

The income threshold for LIHEAP is 200 percent of FPL and 60 percent of SMI.[209] For 2025, these thresholds correspond to:[210]

- $30,120 for a one-person household
- $40,880 for a two-person household
- $51,640 for a three-person household
- $62,400 for a four-person household
- $73,160 for a five-person household
- $83,920 for a six-person household
- $94,680 for a seven-person household

Households can be categorically eligible if one household member receives benefits from SNAP; TANF; or the Aid to the Aged, Blind, and Disabled (AABD) program, although categorically eligible households are still required to provide household income documentation.[211] Renters with utilities included in their rent must verify that they will receive a cash benefit for their rent. The program prioritizes older adults, individuals with a disability, families with young children (under 5) and households with disconnected energy services for heating assistance.[212]

Funding

Table 36 below details the LIHEAP funding and benefits for Illinois.

Table 36. LIHEAP federal funding and benefits amount – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Total Program Funding	$225,093,566	$441,496,399	$208,467,994	$300,885,621
Heating Benefits	$146,812,356	$283,442,467	$98,798,686	$192,771,551
Cooling Benefits	$0	$0	$0	$0
Crisis Benefits	$19,641,958	$82,479,390	$41,982,896	$42,047,552
Weatherization Benefits	$23,276,796	$25,794,448	$21,786,930	$22,825,821
Total Benefits	**$189,731,110**	**$391,716,305**	**$162,568,512**	**$257,644,924**

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

In addition, the DCEO files annual reports to the legislature on budget and funding for LIHEAP, PIPP and other energy assistance programs.[213]

[209] DCEO. 2024-2025 LIHEAP State Plan, p. 10.

[210] DCEO. Utility Bill Assistance – How to Apply. https://dceo.illinois.gov/communityservices/utilitybillassistance/howtoapply.html.

[211] DCEO. 2024-2025 LIHEAP State Plan, p. 5.

[212] DCEO. 2024-2025 LIHEAP State Plan, p. 10.

[213] Energy Assistance Act Reports: IL DCEO. "Reports Required by Statute." Available at: https://dceo.illinois.gov/aboutdceo/reportsrequiredbystatute.html.

Program performance

Table 37 through Table 39 show program performance for the LIHEAP program in Illinois by number of households, percent of income-eligible households served, and average benefits per participating household.

Table 37. Number of households receiving federally funded LIHEAP benefits – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	263,500	202,229	258,424	155,770
Cooling benefits	0	0	0	0
Crisis benefits	34,483	42,502	72,384	36,395

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 38. Percent of income-eligible households served by federally funded LIHEAP benefits – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating benefits	18.545%	14.119%	18.208%	11.399%
Cooling benefits	0.000%	0.000%	0.000%	0.000%
Crisis benefits	2.427%	2.967%	5.100%	2.663%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 39. Average LIHEAP benefits per participating household – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating Benefits	$550	$549	$940	$812
Cooling Benefits	$0	$0	$0	$0
Crisis Benefits	$502	$501	$502	$648

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Weatherization Assistance Program

Program structure

The Illinois Home Weatherization Assistance Program (IHWAP) provides low-income households with up to $16,000 for energy-related weatherization and repair work as well as up to $3,500 for health- and safety-related measures.[214] Eligible weatherization measures include air sealing, attic and wall insulation, HVAC repair or replacement, water heater repair or replacement, and lighting and refrigerator replacement.

As with LIHEAP, DCEO administers the WAP in partnership with a network of local administering agencies throughout the state. Eligible households can fill out an application on DCEO's website or apply in person at a local administering agency.[215]

[214] DCEO. Home Weatherization. https://dceo.illinois.gov/communityservices/homeweatherization.html.

[215] DCEO. Community Action Agencies/Local Administering Agencies. https://dceo.illinois.gov/communityservices/homeweatherization/communityactionagencies.html.

Eligibility

To be eligible for IHWAP benefits, the household must have an income of 200 percent of FPL or below.[216] For 2025, this corresponds to:

- $30,120 for a one-person household
- $40,880 for a two-person household
- $51,640 for a three-person household
- $62,400 for a four-person household
- $73,160 for a five-person household
- $83,920 for a six-person household
- $94,680 for a seven-person household

Applicants who are renters with utilities included in rent are eligible for LIHEAP as long as they provide documentation that their rent exceeds 30 percent of their household income.[217]

Funding

The WAP in Illinois is funded through a combination of LIHEAP and DOE funds. LIHEAP funding amounts are included in Table 36Table 47 above. The state's allocation of DOE WAP funds for FY 2024 is $14,337,411.[218]

Program performance

Table 40 and Table 41 show program performance of the WAP in Illinois by number of households served and percent of income-eligible households served.

Table 40. Number of households receiving LIHEAP-funded WAP benefits – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Weatherization benefits	1,693	1,664	1,930	2,773

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 41. Percent of income-eligible households served by LIHEAP-funded WAP benefits – Illinois

Year	FY 2020	FY 2021	FY 2022	FY 2023
Weatherization Benefits	0.119%	0.116%	0.136%	0.203%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

[216] DCEO. Home Weatherization. https://dceo.illinois.gov/communityservices/homeweatherization.html.

[217] IL DCEO. "Utility Bill Assistance – Frequently Asked Questions." https://dceo.illinois.gov/communityservices/utilitybillassistance/faqs.html.

[218] U.S. Department of Energy (DOE). 2024. Weatherization Program Notice 24-2: Program Year (PY) 2024 Grantee Allocations. https://www.energy.gov/sites/default/files/2024-04/wap-wpn-24-2_041024.pdf.

According to DCEO, participants see an average of 25 percent energy savings after weatherization.[219]

Utility low-income energy efficiency programs

Program structure

Since 2007, Illinois statute requires regulated electric and gas utilities to offer ratepayer-funded energy efficiency programming.[220] State statute further requires offerings for low-income households. The 2017 Future Energy Jobs Act (FEJA) added new requirements that ComEd and Ameren spend at least $25 million and $8.35 million per year on energy efficiency programs for low-income households, respectively.[221] In addition, the statute directs the utilities to "bundle low-income energy efficiency offerings with other programs that serve low-income households to maximize the benefits going to these households." Each electric and gas utility manages its own portfolio of energy efficiency programs.[222]

Eligibility

Residential households at or below 80 percent of Area Median Income (AMI) are eligible for the low-income energy efficiency programs, per statute.[223]

Single family customers are also eligible if they participate in LIHEAP, WAP, SNAP or other income-verified financial assistance programs. In addition, multifamily customers can verify eligibility if they participate in an affordable housing program or the Weatherization Assistance Program, live in a low-income census tract, or provide tenant rent or income verification.[224]

Funding

Utilities recover energy efficiency program costs, including low-income program costs, through an Energy Efficiency and Demand-Response Adjustment rider. Each utility files this rider as a separate tariff before the Commission outside a general rate case.[225,226]

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[219] DCEO. Home Weatherization – Frequently Asked Questions. https://dceo.illinois.gov/communityservices/homeweatherization/faq.html#faq-1irentmyhousedoistillqualifyforweatherization-faq.

[220] Illinois Power Agency Act, 20 ILCS 3855. https://www.ilga.gov/Legislation/ILCS/Articles?ActID=2934&ChapterID=5.

[221] Illinois Public Act 099-0906. Available at: https://www.ilga.gov/documents/legislation/publicacts/99/099-0906.htm.

[222] ILCS 5/8 Section 8-103B(c) https://www.ilga.gov/documents/legislation/ilcs/documents/022000050K8-103B.htm.

[223] ILCS 5/8 Section 8-103F(4) https://www.ilga.gov/Documents/legislation/ilcs/documents/022000050K8-103.htm

[224] Illinois Stakeholder Advisory Group. Illinois Energy Efficiency Policy Manual Version 3.0. https://www.ilsag.info/wp-content/uploads/IL_EE_Policy_Manual_Version_3.0_Final_11-3-2023.pdf

[225] ILCS 5/8 Section 8-103(e) https://www.ilga.gov/Documents/legislation/ilcs/documents/022000050K8-103.htm

[226] For example, *see* ICC Case No. 25-0544. *Ameren Illinois Company. Petition for Approval of Annual Update to Cost Inputs for Rider EE – Energy Efficiency and Demand Response Investment pursuant to 220 ILCS 5/8-103B(d).* https://www.icc.illinois.gov/docket/P2025-0544

Program performance

Table 42 shows the number of low-income (termed "income-qualified" in Illinois) households participating in the utility low-income energy efficiency programs since 2018. Total ow-income participation has increased for all utilities since 2018.

Table 42. Income-qualified homes served

Utility	2018	2019	2020	2021	2022	2023	2024
Ameren	n/a*	n/a*	40,330	45,844	31,564	35,320	45,253
ComEd	44,085	75,450	73,577	79,722	89,548	98,592	84,309
North Shore Gas	108	138	2,087	1,577	3,504	2,528	2,502
Peoples Gas	1,327	4,724	22,395	19,223	59,602	39,989	32,902

Source: Program administrator 2024 Q4 Report Spreadsheets, available at: https://www.ilsag.info/reports/utility-reports/

**Data not available*

Massachusetts

Assistance programs available to Massachusetts residential ratepayers unable to pay their utility bills include LIHEAP, WAP, low-income discount rates, arrearage management programs to assist low-income customers, and disconnection protections.

On January 4, 2024, Massachusetts regulators initiated an ongoing docket to evaluate improvements to these energy assistance programs to reduce the energy burden (the percentage of a household's income spent on energy bills) that may adversely affect certain utility customers. When opening the docket, the DPU noted that in Massachusetts, the average energy burden for all households is about 3 percent while the average energy burden for low-income populations is about 10 percent, and in certain neighborhoods the energy burden is as high as 31 percent.[227]

Through this dedicated docket, the DPU has already gathered stakeholder input on the pros and cons of using tiered discount rates versus PIPPs and determined that Massachusetts utilities should focus on the development of tiered discount rates rather than PIPPs for low-income rate design, for a number of reasons. The DPU also determined that the tiered discount framework should target certain levels of household energy burdens for electric and gas customers, with possible variances depending on primary heating fuel.[228] At the time of writing, the DPU had developed a rate design tool for all Massachusetts distribution companies, with the intention of achieving a 4 percent energy burden for customers in the

[227] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Vote and Order Opening Inquiry. 1.04.2024. p.3.

[228] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Interlocutory Order on Next Steps in Investigation of Energy Affordability. 9.12.2024. p.5-6.

lowest tier; the agency solicited stakeholder input on the rate structure, target energy burden, and acceptability of costs to other customers to fund low-income discounts.[229]

Also noteworthy about the DPU's undertaking is the effort the regulator has made to facilitate broad access to the decision-making process. The two orders issued in the docket are available in 12 languages, and virtual, all-day stakeholder workshops have been live-interpreted into six languages other than English.[230]

Ratepayer-Funded Programs: Low-Income Residential Discount Rate

Massachusetts law directs the energy regulator to require gas and electric distribution companies to provide ratepayer-funded, low-income discount rates.[231] There are numerous electric and gas utilities in the state, so this report highlights program spending and participation for the state's largest utility, National Grid.

Program structure—gas

Eligible customers of Massachusetts' gas investor-owned utilities can receive a 25 percent discount[232] on their monthly gas bill regardless of whether or not they have gas space heating equipment.[233]

Program structure—electric

Regulated electric utility companies in Massachusetts have traditionally provided eligible customers with a flat percentage discount on their monthly electric bill: 32 percent for National Grid,[234] 42 percent for Eversource,[235] and 40 percent for Unitil.[236] National Grid is the first—and currently only—utility to transition to a multi-tiered discount rate structure, which provides higher discounts for customers at lower income levels. Effective June 1, 2025, the company has been using the tiers shown in Table 43. The default discount will be 32 percent for customers who show proof of participation in a qualified means-tested program but whose income is unknown.[237]

[229] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Memorandum. 5.15.2025. p.2.

[230] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Interlocutory Order on Next Steps in Investigation of Energy Affordability. 9.12.2024. p.2.

[231] G.L. c. 1F, § 4(i), accessible at https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXII/Chapter164/Section1F.

[232] "Service Rates." https://www.nationalgridus.com/MA-Gas-Home/Service-Rates/; "Massachusetts Discount Rate Program." https://www.eversource.com/content/residential/account-billing/payment-assistance/discount-rate. "Residential Discount Rate Program (Massachusetts.)" https://unitil.com/node/2622.

[233] For National Grid, these customers take service under rates R-2, R-4B and R-4C. https://www.nationalgridus.com/MA-Gas-Home/Service-Rates/.

[234] "Service Rates." https://www.nationalgridus.com/media/pdfs/billing-payments/tariffs/mae/res_assist_adjmt.pdf.

[235] "Massachusetts Discount Rate Program." https://www.eversource.com/content/residential/account-billing/payment-assistance/discount-rate.

[236] "Residential Discount Rate Program (Massachusetts.)" https://unitil.com/node/2622.

[237] These customers take service under rate R-2. https://www.nationalgridus.com/media/pdfs/billing-payments/tariffs/mae/res_assist_adjmt.pdf.

Table 43. Income tiers for electric rate discounts, National Grid

Income level	Discount
0–100% of FPL	71%
100–125% of FPL	64%
125–150% of FPL	57%
150–200% of FPL	43%
200% of FPL–60% of SMI	32%

Source: M.D.P.U. No. 1558. Residential Assistance Adjustment Provision. https://www.nationalgridus.com/media/pdfs/billing-payments/tariffs/mae/res_assist_adjmt.pdf.

Eligibility—electric and gas

Customers are eligible for the gas discount rate if they are eligible for LIHEAP, which requires that a household's gross income not exceed 200 percent of FPL.[238] Customers are eligible for the electricity discount rate if their household income does not exceed 60 percent of SMI.[239] Customers are also eligible for either program if they already receive benefits under other means-tested programs.[240]

Customers can apply for the discount by filling out a form on National Grid's website.[241] Customers can submit a single application to apply for the discount rate for both their gas and electric accounts. They must attach photo proof of benefits from other means-tested programs if qualifying under this method. Customers may retroactively apply for the low-income discount rate if they can demonstrate continuous qualification for the low-income discount rate for up to 12 months prior to the date of the customer's request.[242]

Funding – gas

Massachusetts' gas utilities file an annual Residential Assistance Adjustment Factor ("RAAF") designed to recover the cost of low-income discounts credited to the bills of the companies' customers receiving service on the low-income rate classes, as well as the incremental cost of the companies' Arrearage Management Program. The filing estimates the discount costs for the next year and accordingly establishes a $/kWh charge to levy on "all other customers" per state law[243]—not only residential customers—to collect the costs. Low-income customers also currently pay the charge.[244] The annual

[238] In a program year in which maximum eligibility for LIHEAP exceeds 200% of the federal poverty level, a household that is income-eligible under LIHEAP shall be eligible for the low-income electric discount. https://www.nationalgridus.com/MA-Gas-Home/Service-Rates/.

[239] National Grid Massachusetts. Service Rates. https://www.nationalgridus.com/MA-Home/Rates/Service-Rates.

[240] These programs are: Emergency Aid to the Elderly Disabled and Children, Food Stamps, Women, Infants, & Children Nutrition Program, Head Start, Mass Health, National School Lunch Program, Public Housing, School Breakfast Program, Supplemental Security Program, TAFDC, Veterans Programs - 115 benefits, DIC surviving parent, or Non-Service Pension.

[241] National Grid Massachusetts. Discount Rate Application for Massachusetts Customers. https://www.nationalgridus.com/Discount-Rate-App-MA.

[242] National Grid Massachusetts. Policy for Retroactive Application of the Low-Income Discount Rate. https://www.nationalgridus.com/media/pdfs/billing-payments/bill-help/cm10396_ma_retro_discount_rate_policy.pdf.

[243] G.L. c. 1F, § 4(i), accessible at https://malegislature.gov/Laws/GeneralLaws/PartI/TitleXXII/Chapter164/Section1F.

[244] The Massachusetts Department of Public Utilities is currently investigating the feasibility of exempting low-income customers from paying the costs of low-income discount rates and has asked each investor-owned utility in the state to

filing also contains a true-up from the previous period to address any over- or under-collections from the RAAFs for the forecast period. National Grid's most recently proposed residential gas RAAF, effective November 1, 2024, is $0.0699 per kilowatt-hour. Table 44 presents the total discount provided to low-income customers in recent years.

Table 44. National Grid's actual and estimated spending on low-income gas discount by program year

	Nov 22 to Oct 23	Nov 23 to Oct 24	Nov 24 to Nov 25
Low-Income Discount	$36,855,230	$40,790,661	$47,033,799

Source: D.P.U. 24-PGAF-GRID. 2024-2025 Residential Assistance Adjustment Factor filing, Exhibit TKB-2. 8.24.2024.

Funding – electric

As with its gas business, National Grid files an annual electric RAAF with similar characteristics. The most recently proposed residential electric RAAF, effective March 1, 2025, is $0.01149 per kilowatt-hour. From February 2025 to January 2026, National Grid estimates that it will provide $125,163,682 in low-income discounts.[245]

Program performance - gas

An average of 108,968 actual or projected customers took or are anticipated to take service on National Grid's low-income gas discount each month from July 2024 to October 2025.[246] Table 45 presents the discount benefits per participant by program year.

Table 45. National Grid's actual and estimated gas low-income discount per participant by program year

	Nov 22 to Oct 23	Nov 23 to Oct 24	Nov 24 to Nov 25
Benefits per Participant	$338	$374	$432

Program performance - electric

National Grid anticipates that an average of 162,411 customers will take service on its low-income electric discount per month, resulting in an average annual discount of $774 per participant over the forecasted year.[247]

comment on how it would allocate the costs among the remaining customers. See "Department of Public Utilities' Fourth Set of Information Requests to the Distribution Companies." 2.28.2025. D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. https://eeaonline.eea.state.ma.us/dpu/fileroom/#/dockets/docket/11154.

[245] D.P.U. 25-02. Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of their 2024 electric reconciliation filing. Exhibit DEG-17. 1.15.2025.

[246] D.P.U. 24-PGAF-GRID. 2024-2025 Residential Assistance Adjustment Factor filing, Exhibit TKB-2. 8.24.2024.

[247] D.P.U. 25-02. Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of their 2024 electric reconciliation filing. Exhibit DEG-17 & 18_RAAF Reconciliation Oct'23-Sep'24. 1.15.2025.

Ratepayer-funded programs: Arrearage Management Programs ("Forgiveness Programs")

Massachusetts has ratepayer-funded arrearage management programs for both its regulated gas and electric utility companies, respectively, which provide eligible customers with a pathway to forgiveness of 100 percent of their pre-plan arrears balance. Again, this section highlights program spending and participation for the state's largest utility, National Grid.

Program structure

The structure of the Forgiveness Program is the same on both the electric and gas sides of National Grid's business, making the offering easy for customers to understand. Participants are eligible for forgiveness of 100 percent of their pre-plan arrears balance up to an annual maximum of $12,000.[248] This forgiveness level exceeds that of some other Massachusetts distribution companies, such as Unitil, whose maximum annual arrearage forgiveness is $9,600 for customers with both electric and gas service and Eversource Gas Company, whose maximum annual arrearage forgiveness is $3,600 per customer.[249]

Participants must enroll in a payment plan that covers their current estimated annual usage in balanced installments. National Grid determines the monthly bill amount based on the customer's average energy usage and reviews active AMP payment plans every three months to determine if the Company must adjust the required monthly installment from the original calculation. If customers make payments on time, National Grid applies forgiveness credits to the arrears balance in equal arrearage credits each month. If an eligible customer has an arrearage balance greater than $12,000, the customer will be eligible for an AMP that continues past 12 months, up to a maximum monthly forgiveness amount of $1,000 per month, in order to forgive the entire pre-plan arrears balance. AMP participants will be removed from normal collection treatment while actively participating.[250]

As part of its annual RAAF reporting, National Grid publicly reports other useful metrics, such as: number of customers (1) who enrolled in the program, (2) who enrolled in the current year, (3) who were removed from the program (by choice or by default), and (4) who successfully completed the program in the current period; average arrearage amount of current year participants; average arrearage amount as a percentage of the total balance due of current year participants; total amount of arrears outstanding for all participants at the end of the current year; and more.[251]

Eligibility

Customers must meet the following criteria to be considered eligible for enrollment in the AMP:

- The applicant must be the customer of record.

[248] National Grid Massachusetts. Arrears Management Program. https://www.nationalgridus.com/MA-Home/Bill-Help/Arrears-Management-Program.

[249] D.P.U. 24-15. Notice of Inquiry by the Department of Public Utilities on its own Motion into Energy Burden with a Focus on Energy Affordability for Residential Ratepayers. Vote and Order Opening Inquiry. 1.04.2024. p.8-9.

[250] D.P.U. 2025-AMP-05. National Grid's Arrearage Management Plan. 3.31.2025.

[251] Id., page 4-5.

- The applicant must be enrolled in the low-income discount rate by receiving a means-tested public benefit or be eligible for LIHEAP.
- The account must be an active residential gas or electric heating or non-heating account that is individually metered.
- The account must have a minimum arrears balance of $300.00 that has aged at least 60 days.
- The customer must agree to being placed on a balanced billing program.
- If a past participant in the AMP, a customer cannot enroll again until one year after the completion or default date.

National Grid auto-enrolls eligible electric and gas customers in the AMP. Customers may also opt in between monthly auto-enrollment dates. National Grid sends information regarding the AMP, the low-income discount rate, fuel assistance, and energy efficiency to all of its customers at different times throughout the year, without regard to their arrearage or low-income status. This is done through multiple channels, such as paper and electronic letters, bill messages, bill inserts, social media, automated customer phone calls, and National Grid's website.

Funding - gas

National Grid collects the costs of its gas forgiveness program through the same gas RAAF used to collect the costs of the low-income residential gas discount rate, as described above. In June 2024 the company began automatically enrolling eligible customers in the AMP, which was enabled by a customer billing system conversion. The projected AMP credits (see Table 46) account for the expected increase in the number of program participants as a result of the automatic enrollment.[252]

Table 46. National Grid's actual and estimated spending on gas arrearage forgiveness by program year

	Nov 22 to Oct 23	Nov 23 to Oct 24	Nov 24 to Nov 25
Arrears Forgiveness Credits	$4,469,374	$8,103,365	$15,797,566

Source: D.P.U. 24-PGAF-GRID. 2024-2025 Residential Assistance Adjustment Factor filing, Exhibit TKB-2. 8.2.2024.

Funding - electric

National Grid collects the costs of its electric arrearage forgiveness program through the electric RAAF, discussed above. From January to December 2024, National Grid provided $31,703,178 in arrearage credits.[253]

[252] D.P.U. 24-PGAF-GRID. Exhibit TKB-1 Pre-Filed Direct Testimony of Theodore K. Black. 8.2.2024.

[253] D.P.U. 25-02. Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of their 2024 electric reconciliation filing. Exhibit DEG-17. 1.15.2025.

Program performance - gas

National Grid did not publish the number of participants on its gas AMP.

Program performance - electric

National Grid files an annual report on its AMP.[254] An average of 27,004 customers participated in the AMP each month over the past year of data, resulting in an average annual forgiveness of $1,174 per participant over the last year.[255]

Low-Income Home Energy Assistance Program

Program structure

The Massachusetts Home Energy Assistance Program (HEAP) provides income-eligible customers with assistance for heating costs and is administered by the Massachusetts Executive Office of Housing and Livable Communities (EOHLC). The regular benefit amount ranges from $357 to $1,500 per year depending on the participant's household income, household size, fuel type, and residence in subsidized housing.[256] Residents of subsidized housing are eligible for a partial HEAP benefit if their monthly rent is more than 30 percent of monthly income and are ineligible for HEAP benefits if their monthly rent is 30 percent or less of monthly income.[257] Residents facing an imminent loss of heat can have their benefit fast-tracked, but the program does not provide a separate crisis assistance benefit.[258]

Applications can be submitted beginning October 1 of each year to local HEAP agencies online, in person, or by mail.[259]

Eligibility

The income threshold for HEAP eligibility is 60 percent of SMI:[260]

- $49,196 for a one-person household
- $64,333 for a two-person household
- $79,470 for a three-person household

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[254] D.P.U. 2025-AMP-05. National Grid's Arrearage Management Program ("AMP") or Forgiveness Program, p. 4-5. https://fileservice.eea.comacloud.net/V3.1.0/FileService.Api/file//iiddcahe?QgfBmFaPraoduY584A/6kcEmiDhMBXK0ednWT8WFP5Ok9v9pxUxyG6LkaCeWBSjqbmMlNqhcSkxPf0qUr1gASPKrYE1qejvebf677PtCVStUdHoHpEGELGLGjR+ZpYgt.

[255] D.P.U. 25-02. Petition of Massachusetts Electric Company and Nantucket Electric Company, each d/b/a National Grid, for approval of their 2024 electric reconciliation filing. Exhibit DEG-17 & 18_RAAF Reconciliation Oct'23-Sep'24. 1.15.2025.

[256] Massachusetts Executive Office of Housing and Livable Communities (EOHLC). FY 2025 Home Energy Assistance Program (HEAP) Income Eligibility and Benefit Levels. https://www.mass.gov/doc/fy-2025-heap-income-eligibility-and-benefit-chart-january-2025/download.

[257] EOHLC. 2025 LIHEAP Detailed Model Plan, p. 8. https://liheapch.acf.hhs.gov/docs/2025/state-plans/MA_Plan_2025.pdf.

[258] EOHLC. 2025 LIHEAP Detailed Model Plan, p. 12.

[259] EOHLC. Learn about Home Energy Assistance – HEAP. https://www.mass.gov/info-details/learn-about-home-energy-assistance-heap.

[260] EOHLC. Learn about Home Energy Assistance – HEAP. https://www.mass.gov/info-details/learn-about-home-energy-assistance-heap.

- $94,608 for a four-person household
- $109,745 for a five-person household
- $124,882 for a six-person household
- $127,720 for a seven-person household
- $130,559 for an eight-person household
- $133,397 for a nine-person household
- $136,235 for a ten-person household

Recipients of SNAP benefits are considered categorically eligible.[261]

Funding

Table 47

Table 47. LIHEAP federal funding and benefits amount – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Total Program Funding	$160,632,772	$322,968,404	$148,336,307	$218,489,132
Heating Benefits	$125,406,579	$267,730,741	$112,063,265	$182,772,437
Cooling Benefits	$0	$0	$0	$0
Crisis Benefits	$0	$0	$0	$3,691,085
Weatherization Benefits	$13,425,000	$13,000,000	$16,972,082	$0
Total Benefits	**$141,404,756**	**$283,235,825**	**$132,167,359**	**$189,263,522**

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Program performance

Table 48 through Table 50 show program performance for the LIHEAP program in Massachusetts.

Table 48. Number of households receiving federally funded LIHEAP benefits – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating Benefits	146,234	134,180	133,635	152,011
Cooling Benefits	0	0	0	0
Crisis Benefits	9,663	6,496	10,180	13,229

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

[261] EOHLC. 2025 LIHEAP Detailed Model Plan, p. 5.

Table 49. Percent of income-eligible households served by federally funded LIHEAP benefits – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating Benefits	17.983%	16.116%	15.857%	18.551%
Cooling Benefits	0.000%	0.000%	0.000%	0.000%
Crisis Benefits	1.188%	0.780%	1.208%	1.614%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 50. Average LIHEAP benefits per participating household – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Heating Benefits	$884	$869	$1,344	$1,414
Cooling Benefits	$0	$0	$0	$0
Crisis Benefits	$0	$0	$0	$0

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Weatherization Assistance Program

Program structure

The WAP provides low-income households with full-scale home energy efficiency services, offering an average of $4,725 in energy efficiency measures such as air sealing, attic insulation, sidewall insulation, floor insulation, pipe and/or duct insulation, and limited energy-related repairs. In addition, the program also provides an evaluation of participants' heating systems as well as health and safety testing of combustion appliances. [262]

The program is administered by EOHLC in partnership with a network of local agencies, which are the same administrators for HEAP in many areas of the state. The WAP application is the same as the HEAP application and can be submitted online or at local agencies. [263]

Eligibility

As with HEAP, WAP has an income-eligibility threshold of 60 percent of SMI (p. 67). Households with a member receiving SSI or Transitional Aid to Families with Dependent Children (TAFDC) benefits are categorically eligible, and priority of service is provided to households that have elderly or disabled members, children six years old and under, higher energy costs, or are Native American.[264] Additionally, renters are eligible to participate with their landlord's permission.

[262] EOHLC. Weatherization Assistance Program (WAP). https://www.mass.gov/info-details/weatherization-assistance-program-wap.

[263] EOHLC. Weatherization Assistance Program (WAP). https://www.mass.gov/info-details/weatherization-assistance-program-wap.

[264] EOHLC. Weatherization Assistance Program (WAP). https://www.mass.gov/info-details/weatherization-assistance-program-wap.

Funding

The WAP in Massachusetts is funded through a combination of LIHEAP and DOE funds. LIHEAP funding amounts are included in Table 47 above. The state's allocation of DOE WAP funds for FY 2024 is $6,978,497.[265]

Program performance

Table 51 and Table 52 detail the program performance for the Massachusetts WAP.

Table 51. Number of households receiving LIHEAP-funded WAP benefits – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Weatherization Benefits	7,926	8,881	8,932	8,042

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

Table 52. Percent of income-eligible households served by LIHEAP-funded WAP benefits – Massachusetts

Year	FY 2020	FY 2021	FY 2022	FY 2023
Weatherization Benefits	0.975%	1.067%	1.060%	0.981%

Source: LIHEAP Performance Management. Data Warehouse - Custom Reports.

4.3. Conclusion

Our research identified several best practices for utility energy assistance programs, including ways to streamline application processes, that could guide improvements in the District's energy assistance programs. Maryland, Illinois, and Massachusetts illustrate some of these best practices, such as expanded categorical eligibility and automatic enrollment, incorporating tiered- or income-based low-income discount rates, and coordinating financial assistance with energy efficiency offerings.

Looking forward, policymakers and regulators could consider adopting key practices to strengthen energy assistance programs in the District. Priorities could include diversifying funding sources to improve program resilience, expanding renter eligibility to cover master-metered households, introducing PIPP or tiered discount designs to better align benefits with household income, and expanding automatic enrollment to streamline access for categorically eligible customers.

These examples demonstrate that policy and regulatory choices, particularly around program accessibility and benefit design, can improve program reach, reduce administrative burden, and deliver more equitable outcomes for low- and moderate-income households.

[265] U.S. Department of Energy (DOE). 2024. Weatherization Program Notice 24-2: Program Year (PY) 2024 Grantee Allocations. https://www.energy.gov/sites/default/files/2024-04/wap-wpn-24-2_041024.pdf.

Appendix A. METRIC CALCULATIONS

Hours at minimum wage for electric customers

We found that the average electric customer would have to work 7.8 hours in the summer and 7.1 in the winter season at minimum wage to pay for their electricity bill. For this calculation, we first determined the consumption of the average electricity customer from 2022 to May 2025.[266] Using the average electricity consumption, we then calculated the monthly electricity bill of an average customer using rates as of June 2025.[267] Finally, we calculated the hours at minimum wage by dividing the electric bill of an average customer by the minimum wage.[268]

$$Minimum\ wage\ in\ DC\ as\ of\ June\ 2025 = \$17.50$$

$$Average\ summer\ month\ electricity\ usage\ per\ customer = 617\ kWh$$

$$Electricity\ bill\ at\ 617\ kWh\ (June\ 2025\ rates) = \$136.55$$

$$\$136.55 \div \$17.50 = 7.8\ hours\ at\ minimum\ wage$$

$$Average\ winter\ month\ electricity\ usage\ per\ customer = 5545\ kWh$$

$$Electricity\ bill\ at\ 527\ kWh\ (June\ 2025\ rates) = \$123.40$$

$$\$1123.40 \div \$17.50 = 7.1\ hours\ at\ minimum\ wage$$

We were not able to separate out all-electric customers from electric customers who heat with natural gas. To facilitate future calculations, we recommend that PEPCO be required to provide data to the PSC with monthly electric usage and customer counts separated by customers who heat their home using electricity and by customers who heat using another fuel. We also recommend that the Commission require PEPCO and WGL to conduct essential use studies to determine the essential level of consumption of their customers.[269]

[266] The PSC provides monthly PEPCO MWh usage at https://dcpsc.org/PSCDC/media/PDFFiles/Electric/electric_sumstats_no_cons.pdf and the monthly PEPCO customer count at https://dcpsc.org/PSCDC/media/PDFFiles/Electric/electric_sumstats_cust_energyuse.pdf.

[267] The PSC provides an electric bill calculator at https://dcpsc.org/Retail-Choice/How-to-Choose/How-to-Choose-an-Electric-Supplier/Electric-Bill-Calculators.aspx.

[268] See District of Columbia Department of Employment Services Office of Wage-Hour Compliance. June 2025. Minimum Wage. Available at https://does.dc.gov/service/office-wage-hour-compliance-0.

[269] DNV, 2023, "Essential Use of Electricity Study."

Hours at minimum wage for gas customers

We found that in April 2025, the average gas customer in DC would have to work 10.5 hours at minimum wage to pay their gas bill in an average winter month.[270] To determine monthly consumption in an average winter month, we calculated the average residential consumption during the winter heating season in each year from 2021 to 2023.[271] We then divided average consumption by the number of residential gas customers.[272] Using the average monthly gas consumption during the winter heating season, we calculated the average monthly gas bill.[273] To calculate hours at minimum wage, we divided the average monthly gas bill during the winter heating season by the minimum wage.

$$Minimum\ wage\ in\ DC\ as\ of\ June\ 2025 = \$17.50$$

$$Average\ gas\ usage\ per\ customer\ in\ the\ winter\ heating\ season = 114\ therms$$

$$Gas\ bill\ at\ 114\ therms\ (July\ 2025\ rates) = \$183.83$$

$$\$183.83 \div \$17.50 = 10.5\ hours\ at\ minimum\ wage$$

[270] WGL defines the winter season as November through March; see "Washington Gas Light Company Rate Schedules and General Service Provisions for Gas Service in the District of Columbia": https://www.washingtongas.com/-/media/d7dc128b90bc4b5cada9f12092ef174a.pdf.

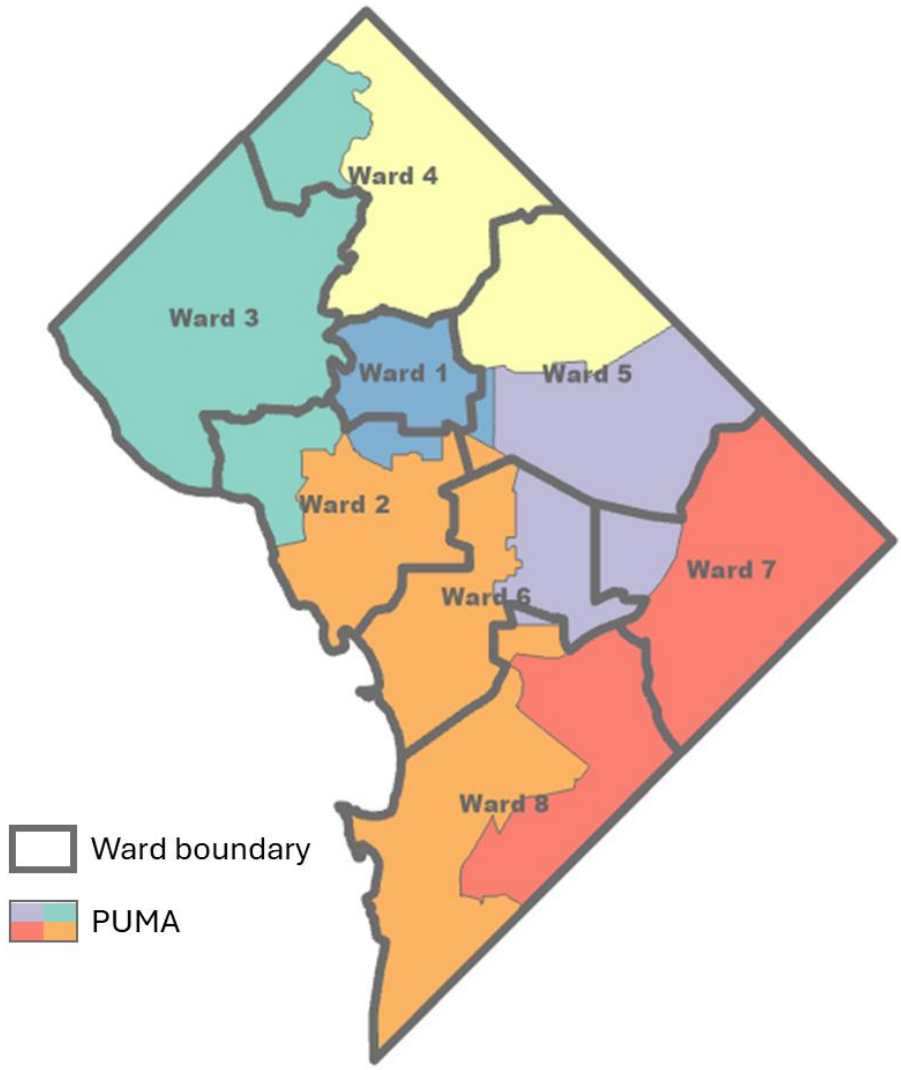
[271] See EIA data for District of Columbia natural gas residential consumption: https://www.eia.gov/dnav/ng/hist/n3010dc2m.htm.

[272] See EIA data for the number of District of Columbia natural gas residential customers: https://www.eia.gov/dnav/ng/hist/na1501_sdc_8a.htm.

[273] The PSC provides a natural gas bill calculator at https://dcpsc.org/Retail-Choice/How-to-Choose/Natural-Gas/Monthly-Washington-Gas-Light-Natural-Gas-Bill-Calc.aspx.

Appendix B. Boundaries of DC Wards and Census PUMAs

Figure 5. Census Public Use Microdata Areas (PUMA) boundaries and ward boundaries in the District



OPC PERFORMANCE OVERSIGHT HEARING

Response to Governance & Personnel Question #1

OPC ORGANIZATIONAL CHART

ATTACHMENT 2

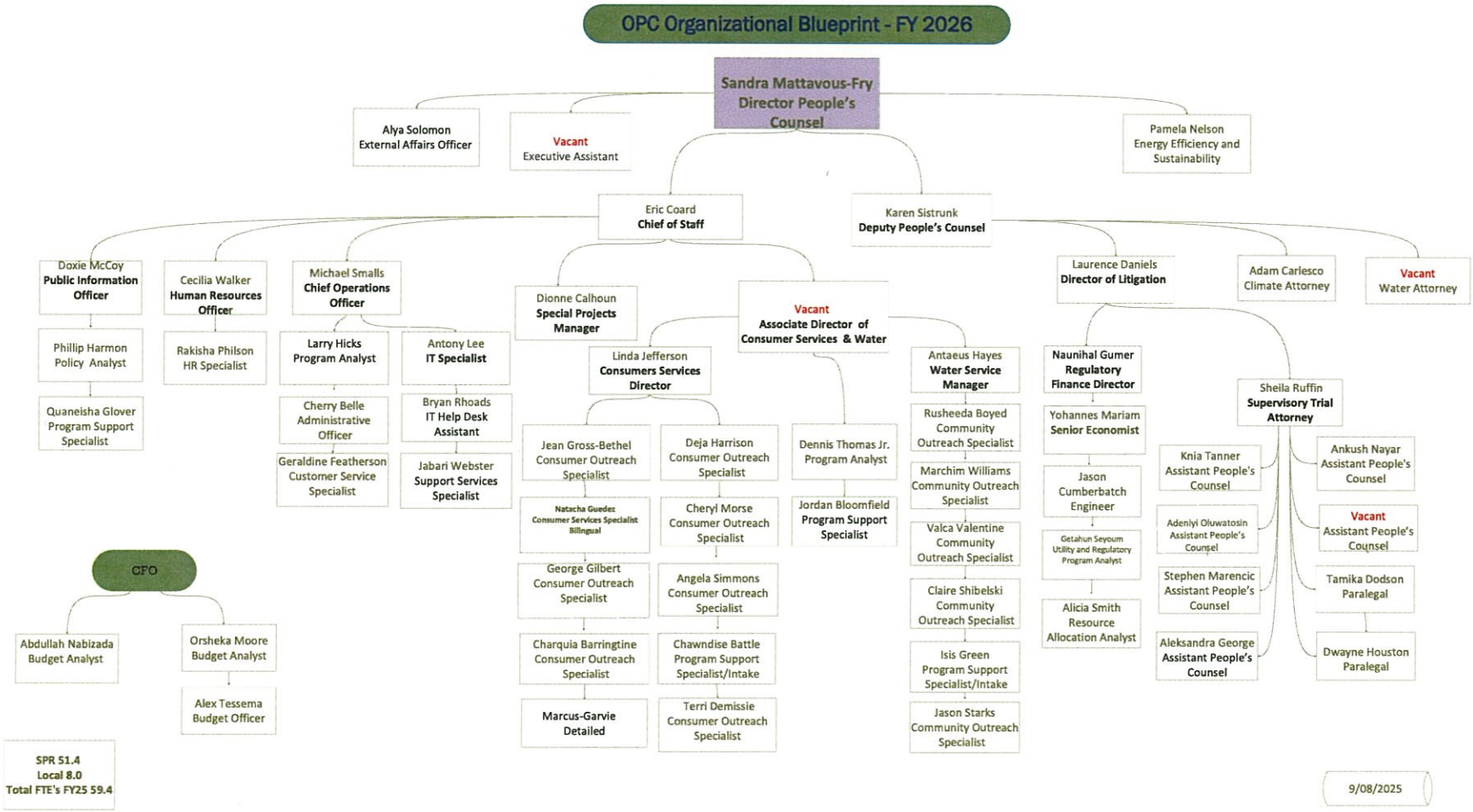
Attachment #2

OPC Performance Oversight Hearing

Response to Governance & Personnel Question #1

OPC ORGANIZATIONAL CHART

OPC Organizational Blueprint - FY 2026



OPC PERFORMANCE OVERSIGHT HEARING

Response to Governance & Personnel Question #7

OPC POSITION FUNDING REPORT

Attachment #3

OPC Performance Oversight Hearing

Response to Governance & Personnel Question #7

OPC Position Funding Report

PeopleSoft
Report ID: DCPYR215 POSITION / Page No. 1
Run Date 12/29/2025
Run Time 14:18:45
As Of Date: 29-Dec-25

Data-Issue	Position Status	Position Nı	Title	Name	EmplId	Empl Rcd	Hire Date	Vacant Stati	Grade	Step	Salary	FTE x Dist ¶	Adds to FTI	Job Code	Job DeptID	Job Dept N	Pay Plan	Bargaing U	Union Cod	Budgeted F	Report Age	Funding Ag	HR Agency	Combo Co	Distributio	Fund	Fund Name
	A	00001504	DEPUTY PEOPLES COUNSEL	SISTRUNK,KAREN RENE	00033446	0	9/18/2006	F	2	0	200880	0.05	Y	001022	DJ10000000	Office of Pe	LX	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00001504	DEPUTY PEOPLES COUNSEL	SISTRUNK,KAREN RENE	00033446	0	9/18/2006	F	2	0	200880	0.95	Y	001022	DJ10000000	Office of Pe	LX	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00001649	People's Counsel	Mattavous Frye,Sandra	00001527	0	10/1/1984	F	2	0	209220.2	0.25	Y	002762	DJ10000000	Office of Pe	LX	CH11	XAA	Y	DJ	DJ0	DJ	000146185	25	1060127	ADVOCATE FO
	A	00001649	People's Counsel	Mattavous Frye,Sandra	00001527	0	10/1/1984	F	2	0	209220.2	0.75	Y	002762	DJ10000000	Office of Pe	LX	CH11	XAA	Y	DJ	DJ0	DJ	000146184	75	1060127	ADVOCATE FO
	A	00008409	ASST PEOPLES COUNSEL	George Ruiz,Aleksandra	00134908	0	6/24/2024	F	14	5	145969	0.05	Y	007344	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	5	1060127	ADVOCATE FO
	A	00008409	ASST PEOPLES COUNSEL	George Ruiz,Aleksandra	00134908	0	6/24/2024	F	14	5	145969	0.95	Y	007344	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	95	1060127	ADVOCATE FO
	A	00008414	Associate Director Consumer &					V	15	0	152434.5	1	Y	557057			DS	CH11	MSS	Y	DJ	DJ0	DJ	000146184	100	1060127	ADVOCATE FO
	A	00012034	ACCOUNT/RATE CASE MANAGER	Gumer,Naunihal Singh	00012141	0	4/26/1987	F	17	0	184306.1	0.05	Y	300020	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00012034	ACCOUNT/RATE CASE MANAGER	Gumer,Naunihal Singh	00012141	0	4/26/1987	F	17	0	184306.1	0.95	Y	300020	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00016149	Budget Analyst	Nabizada,Abdullah Fahim	00129854	0	7/17/2023	F	11	7	89333	1	Y	008212	AT07100500	Economic I	DS	CH11	CFO	Y	DJ	DJ0	AT	000146175	100	1060127	ADVOCATE FO
	A	00021335	Attorney Advisor	Marencic,Stephen E	00090064	0	1/25/2016	F	13	8	134416	0.05	Y	553090	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	5	1060127	ADVOCATE FO
	A	00021335	Attorney Advisor	Marencic,Stephen E	00090064	0	1/25/2016	F	13	8	134416	0.95	Y	553090	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	95	1060127	ADVOCATE FO
	A	00023436	Resource Allocation Analyst	Smith,Alicia	00026548	0	10/22/1990	F	14	7	131138	1	Y	551405	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146181	100	1060127	ADVOCATE FO
	A	00045655	Budget Officer	Tessema,Alex	00067534	0	1/2/2012	F	14	4	138307	1	Y	008199	AT07100500	Economic I	DS	CH11	CFO	Y	DJ	DJ0	AT	000146175	100	1060127	ADVOCATE FO
	A	00046360	Information Technology Spec.	Lee,Anthony T	00023595	0	5/16/1994	F	15	0	164746	1	Y	553005	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146182	100	1060127	ADVOCATE FO
	A	00046361	ASST PEOPLES COUNSEL	Carlesco,Adam Scott	00128367	0	5/15/2023	F	14	8	158849	0.05	Y	007344	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	5	1060127	ADVOCATE FO
	A	00046361	ASST PEOPLES COUNSEL	Carlesco,Adam Scott	00128367	0	5/15/2023	F	14	8	158849	0.95	Y	007344	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	95	1060127	ADVOCATE FO
	A	00046365	ASST PEOPLES COUNSEL					V	14	0	128795	1	Y	007344			LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	100	1060127	ADVOCATE FO
	A	00064883	Community Outreach Specialist	Gilbert Jr.,George Carlton	00004791	1	3/4/2019	F	12	7	95816	0.05	Y	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00064883	Community Outreach Specialist	Gilbert Jr.,George Carlton	00004791	1	3/4/2019	F	12	7	95816	0.95	Y	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00071651	Manager Consumer Services	Jefferson,Linda Holland	00035614	0	5/29/2007	F	14	0	154859.2	1	Y	554455	DJ10000000	Office of Pe	DS	CH11	MSS	Y	DJ	DJ0	DJ	000146182	100	1060127	ADVOCATE FO
	A	00071943	CONSUMER OUTREACH SPECIALIST	Marcus-Garvie,Abigail Betsy	00061723	0	6/20/2010	F	11	10	84167	0.3	Y	30007	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
	A	00071943	CONSUMER OUTREACH SPECIALIST	Marcus-Garvie,Abigail Betsy	00061723	0	6/20/2010	F	11	10	84167	0.7	Y	30007	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
	A	00072177	Community Outreach Specialist	Simmons,Angela	00022849	0	10/23/2023	F	12	8	98322	0.3	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
	A	00072177	Community Outreach Specialist	Simmons,Angela	00022849	0	10/23/2023	F	12	8	98322	0.7	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
	A	00073160	Public Information Officer	McCoy,Doxie A	00037962	0	1/4/2016	F	14	0	155547.5	1	Y	554931	DJ10000000	Office of Pe	DS	CH11	MSS	Y	DJ	DJ0	DJ	000146182	100	1060127	ADVOCATE FO
	A	00073336	LITIGATION ASSISTANT	Houston,Dwayne C	00095884	0	1/23/2017	F	11	10	84167	0.2	Y	300026	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	20	1060127	ADVOCATE FO
	A	00073336	LITIGATION ASSISTANT	Houston,Dwayne C	00095884	0	1/23/2017	F	11	10	84167	0.8	Y	300026	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
	A	00074777	Attorney Advisor	Nayar,Ankush	00121328	0	2/28/2022	F	14	8	158849	0.2	Y	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	20	1060127	ADVOCATE FO
	A	00074777	Attorney Advisor	Nayar,Ankush	00121328	0	2/28/2022	F	14	8	158849	0.8	Y	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
	A	00075543	CONSUMER OUTREACH SPECIALIST	Nelson,Pamela Alexis	00027421	0	4/3/2000	F	14	10	141707	0.3	Y	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
	A	00075543	CONSUMER OUTREACH SPECIALIST	Nelson,Pamela Alexis	00027421	0	4/3/2000	F	14	10	141707	0.7	Y	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
	A	00075552	Chief of Staff	Coard,Eric W	00025414	0	5/1/2018	F	16	0	197337	1	Y	552321	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	100	1060127	ADVOCATE FO
	A	00076963	Human Resources Program Manage	Walker,Cecilia C.	00037795	0	1/22/2008	F	15	0	157000	1	N	557904	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	100	1060127	ADVOCATE FO
	A	00077366	Attorney Advisor	Tanner,Knia	00119203	0	9/13/2021	F	14	6	150262	0.05	Y	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	5	1060127	ADVOCATE FO
	A	00077366	Attorney Advisor	Tanner,Knia	00119203	0	9/13/2021	F	14	6	150262	0.95	Y	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	95	1060127	ADVOCATE FO
	A	00077774	ASSISTANT PEOPLES COUNSEL	Daniels,Laurence Christopher	00004826	0	1/30/2000	F	15	10	193382	1	Y	300009	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	100	1060127	ADVOCATE FO
	A	00077832	Policy Analyst	Harmon,Phillip G	00003078	0	12/1/1997	F	15	0	148631.7	0.2	Y	160059	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	20	1060127	ADVOCATE FO
	A	00077832	Policy Analyst	Harmon,Phillip G	00003078	0	12/1/1997	F	15	0	148631.7	0.8	Y	160059	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
	A	00077851	SENIOR ECONOMIST	Mariam,Yohannes K.G.	00036253	0	8/6/2007	F	15	0	163000	0.05	Y	001548	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00077851	SENIOR ECONOMIST	Mariam,Yohannes K.G.	00036253	0	8/6/2007	F	15	0	163000	0.95	Y	001548	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00082644	Executive Assistant					V	13	0	93069	0.5	Y	552277			DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
	A	00082644	Executive Assistant					V	13	0	93069	0.5	Y	552277			DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
	A	00082769	Program Support Specialist	Battle,Chawndise Dorathea	00126452	0	11/7/2022	F	11	5	73677	0.5	N	552093	DJ10000000	Office of Pe	DS	CH11	XAA	N	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
	A	00082769	Program Support Specialist	Battle,Chawndise Dorathea	00126452	0	11/7/2022	F	11	5	73677	0.5	N	552093	DJ10000000	Office of Pe	DS	CH11	XAA	N	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
	A	00084807	Chief Operations Officer	Smalls,Michael R.	00039436	0	7/7/2008	F	16	0	186500	0.5	Y	553364	DJ10000000	Office of Pe	DS	CH11	MSS	Y	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
	A	00084807	Chief Operations Officer	Smalls,Michael R.	00039436	0	7/7/2008	F	16	0	186500	0.5	Y	553364	DJ10000000	Office of Pe	DS	CH11	MSS	Y	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
	A	00091994	Community Outreach Specialist	Demissie,Terri	00131459	0	9/18/2023	F	12	5	90805	0.05	Y	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00091994	Community Outreach Specialist	Demissie,Terri	00131459	0	9/18/2023	F	12	5	90805	0.95	Y	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00093243	ASSISTANT PEOPLES COUNSEL	Ruffin,Sheila Brittany	00139327	0	4/14/2025	F	15	6	176744	0.05	Y	300006	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
	A	00093243	ASSISTANT PEOPLES COUNSEL	Ruffin,Sheila Brittany	00139327	0	4/14/2025	F	15	6	176744	0.95	Y	300006	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
	A	00094097	Program Support Specialist	Bloomfield,Jordan A	00141788	0	9/15/2025	F	9	1	52828.43	0.5	Y	554033	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
	A	00094097	Program Support Specialist	Bloomfield,Jordan A	00141788	0	9/15/2025	F	9	1	52828.43	0.5	Y	554033	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
	A	00097229	Community Outreach Specialist	Barringtine,Charquia Monique	00101361	0	12/24/2017	F	12	9	100827	0.35	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	35	1060127	ADVOCATE FO
	A	00097229	Community Outreach Specialist	Barringtine,Charquia Monique	00101361	0	12/24/2017	F	12	9	100827	0.65	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146181	65	1060127	ADVOCATE FO
	A	00097302	Community Outreach Specialist	Valentine,Valca M	00022539	1	4/29/2019	F	12	5	90805	1	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
	A	00097303	Community Outreach Specialist	Boyd,Rusheeda R	00108019	0	4/29/2019	F	12	5	90805	1	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
	A	00097304	Community Outreach Specialist	Williams Sr.,Marchim R	00070934	0	4/29/2019	F	12	5	90805	1	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
	A	00097328	Attorney Advisor					V	14	0	128795	1	Y	553092			LA	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS

A	00097365	Manager Consumer Services	Hayes,Antaeus B	00042186	0	11/9/2020	F	14	0	130000	1	N	554455	DJ10000000	Office of Pe	DS	CH11	MSS	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
A	00097514	Program Analyst	Hicks,Larry	00028490	0	10/24/2022	F	12	10	103333	0.35	N	552128	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146181	35	1060127	ADVOCATE FO
A	00097514	Program Analyst	Hicks,Larry	00028490	0	10/24/2022	F	12	10	103333	0.65	N	552128	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	65	1060127	ADVOCATE FO
A	00100035	Attorney Advisor	Adeniyi,Oluwatosin A	00131247	0	9/5/2023	F	14	6	150262	0.5	N	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
A	00100035	Attorney Advisor	Adeniyi,Oluwatosin A	00131247	0	9/5/2023	F	14	6	150262	0.5	N	553092	DJ10000000	Office of Pe	LA	CH11	XAA	Y	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
A	00104852	CONSUMER OUTREACH SPECIALIST	Gross Bethel,Jean M	00021507	0	10/29/1984	F	14	7	131138	0.25	N	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	25	1060127	ADVOCATE FO
A	00104852	CONSUMER OUTREACH SPECIALIST	Gross Bethel,Jean M	00021507	0	10/29/1984	F	14	7	131138	0.75	N	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	75	1060127	ADVOCATE FO
A	00104854	CONSUMER OUTREACH SPECIALIST	Morse,Cheryl Lee	00033294	0	9/17/2006	F	14	7	131138	0.2	N	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	20	1060127	ADVOCATE FO
A	00104854	CONSUMER OUTREACH SPECIALIST	Morse,Cheryl Lee	00033294	0	9/17/2006	F	14	7	131138	0.8	N	300042	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
A	00104855	Community Outreach Specialist	Guedez,Natacha	00117213	0	5/24/2021	F	11	9	82069	0.3	N	551093	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
A	00104855	Community Outreach Specialist	Guedez,Natacha	00117213	0	5/24/2021	F	11	9	82069	0.7	N	551093	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
A	00104856	Program Support Specialist	Glover,Quanelsha L	00107647	0	3/11/2019	F	12	8	98322	0.3	N	552510	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
A	00104856	Program Support Specialist	Glover,Quanelsha L	00107647	0	3/11/2019	F	12	8	98322	0.7	N	552510	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
A	00105862	Community Outreach Specialist	Harrison,Deja Dionne	00094740	0	10/21/2024	F	11	6	75775	0.5	N	551093	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	50	1060127	ADVOCATE FO
A	00105862	Community Outreach Specialist	Harrison,Deja Dionne	00094740	0	10/21/2024	F	11	6	75775	0.5	N	551093	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	50	1060127	ADVOCATE FO
A	00108371	Program Support Specialist	Green,Isis	00115983	1	5/9/2022	F	11	5	73677	1	N	552510	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
A	00108372	Community Outreach Specialist	Starks,Jason A.	00056081	0	1/31/2022	F	12	5	90805	1	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
A	00108373	Community Outreach Specialist	Shibelski,Claire Helen Ehman	00132060	0	10/23/2023	F	12	5	90805	1	N	553664	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146186	100	1010001	LOCAL FUNDS
A	00108374	Human Resources Specialist	PHILSON,RAKISHA R	00028981	0	1/9/2023	F	11	10	84167	1	N	553559	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	100	1060127	ADVOCATE FO
A	00108422	Information Technology Special	Rhoades,Bryan Keith	00127814	0	3/13/2023	F	13	7	110967	1	N	551973	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146182	100	1060127	ADVOCATE FO
A	00109876	General Engineer	Cumberbatch,Jason Selwyn	00083131	0	9/8/2014	F	14	9	138184	1	N	555339	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	100	1060127	ADVOCATE FO
A	00110018	Paralegal Specialist	Dodson,Tamika Renee	00007548	0	6/27/2004	F	12	10	103333	0.2	N	551854	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	20	1060127	ADVOCATE FO
A	00110018	Paralegal Specialist	Dodson,Tamika Renee	00007548	0	6/27/2004	F	12	10	103333	0.8	N	551854	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
A	00110019	Customer Service Specialist	Featherson,Geraldine L	00115956	0	12/7/2020	F	9	9	68038	1	N	552372	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146182	100	1060127	ADVOCATE FO
A	00110946	Program Analyst	Thomas Jr.,Dennis I	00137007	0	9/9/2024	F	12	6	93311	0.3	N	552128	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	30	1060127	ADVOCATE FO
A	00110946	Program Analyst	Thomas Jr.,Dennis I	00137007	0	9/9/2024	F	12	6	93311	0.7	N	552128	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	70	1060127	ADVOCATE FO
A	00111470	External Affairs Officer	Solomon,Alya Martine	00080451	0	4/7/2014	F	15	0	145000	0.2	N	557234	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146183	20	1060127	ADVOCATE FO
A	00111470	External Affairs Officer	Solomon,Alya Martine	00080451	0	4/7/2014	F	15	0	145000	0.8	N	557234	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	80	1060127	ADVOCATE FO
A	00111481	Administrative Officer	McClaine,Cherry Marsha	00019207	0	4/11/1994	F	13	8	113950	0.35	N	550989	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146180	35	1060127	ADVOCATE FO
A	00111481	Administrative Officer	McClaine,Cherry Marsha	00019207	0	4/11/1994	F	13	8	113950	0.65	N	550989	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146181	65	1060127	ADVOCATE FO
A	00115081	Special Projects Manager	Calhoun,Dionne J	00071225	0	4/30/2018	F	14	7	131138	0.05	N	557731	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	5	1060127	ADVOCATE FO
A	00115081	Special Projects Manager	Calhoun,Dionne J	00071225	0	4/30/2018	F	14	7	131138	0.95	N	557731	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146184	95	1060127	ADVOCATE FO
A	00115082	Program Analyst	Seyoum,Getahun D	00141562	0	8/25/2025	F	12	9	100827	1	N	552128	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	100	1060127	ADVOCATE FO
A	00115083	Support Services Specialist	Webster,Jabari D	00139228	0	3/31/2025	F	9	2	55915	1	N	550883	DJ10000000	Office of Pe	DS	CH11	XAA	Y	DJ	DJ0	DJ	000146185	100	1060127	ADVOCATE FO

TOTAL POSITIONS PRINTED = 59

Data Issues: If Column#A line item has any indicator, the below reasons represent the indicator

C - The COMBO CODE assigned invalid, PS attributes not matching with DIFS or NO budget entry for current FY. Budget office please Review, create combo and assign in Dept. Budget entry

D - Department Budget Entry missing or inactive for the Position Nbr and Department ID. Budget office need to create budget entry with recent position data DeptID

J - Job Data Position Nbr and Department ID not matching with Position Data DeptID, contact Agency HR need to refresh Job Data

Program	CostCente	ProjectID	Award	Task Numt	Project Or	ComboCo	Position D	Departmer	Location C	Location N	Reports to	Reports to	Position Ef	Position N	F/P Time	Reg/Temp	Work Sche	WAE	Sal Plan	Head Cour	FTE	Employee	WGI Due D	Gvt Lei Dat	Hourly Rate	Sensitivity	Sensitivity	Emergenc	Essential S	Drug Test	Traffic Che	Credit Che	Residency	Security Cl
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	7/8/2018		F	Reg	F	N	LX0001	1	1			3/12/2023	96.576923	5	None	N	Y	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	7/8/2018		F	Reg	F	N	LX0001	1	1			3/12/2023	96.576923	5	None	N	Y	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00013877	BOWSER M	10/1/2016		F	Reg	F	N	LX0001	1	1			10/2/2005	100.58662	1	Non Sensit	N	Y	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00013877	BOWSER M	10/1/2016		F	Reg	F	N	LX0001	1	1			10/2/2005	100.58662	1	Non Sensit	N	Y	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	10/5/2025		F	Reg	F	N	LA0001	1	1		6/27/2027	6/29/2025	70.177404	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	10/5/2025		F	Reg	F	N	LA0001	1	1		6/27/2027	6/29/2025	70.177404	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	8/28/2022		F				DS0086	1	1				73.29	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	7/8/2018		F	Reg	F	N	DS0087	1	1			9/17/2006	88.608707	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	7/8/2018		F	Reg	F	N	DS0087	1	1			9/17/2006	88.608707	5	None	N	N	N	N	N	N	
150003	10001				DJ0	GL	AT0710050	Economic I	LOCDC00C	1133 15th :	00007857	Moore Orsl	7/16/2023		F	Reg	F	N	DS0007	1	1		7/25/2027	7/27/2025	42.948558	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		5/31/2026	6/2/2024	64.623077	6	Security	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		5/31/2026	6/2/2024	64.623077	6	Security	N	N	N	N	N	N	
100022	30040				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00012034	Gumer Nat	7/30/2019		F	Reg	F	N	DS0087	1	1		7/25/2027	3/26/2023	63.047115	6	Security	N	N	N	N	N	N	
150003	10001				DJ0	GL	AT0710050	Economic I	LOCDC00C	1133 15th :	00077139	Abdirahma	10/1/2016		F	Reg	F	N	DS0007	1	1		2/22/2026	2/23/2025	66.49375	5	None	N	N	N	N	N	N	
100071	30040				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00084807	Smalls Mic	4/24/2022		F	Reg	F	N	DS0087	1	1			8/21/2016	79.204808	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001504	SISTRUNK I	1/23/2024		F	Reg	F	N	LA0001	1	1		5/17/2026	5/19/2024	76.369712	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001504	SISTRUNK I	1/23/2024		F	Reg	F	N	LA0001	1	1		5/17/2026	5/19/2024	76.369712	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F				LA0001	1	1				61.92	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	7/27/2025		F	Reg	F	N	DS0087	1	1		7/25/2027	3/10/2024	46.065385	6	Security	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	7/27/2025		F	Reg	F	N	DS0087	1	1		7/25/2027	3/10/2024	46.065385	6	Security	N	N	N	N	N	N	
100071	30040				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	########		F	Reg	F	N	DS0086	1	1			7/3/2022	74.451534	5	None	N	Y	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	7/23/2017		F	Reg	F	N	DS0087	1	1			6/30/2013	40.464904	1	Non Sensit	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	7/23/2017		F	Reg	F	N	DS0087	1	1			6/30/2013	40.464904	1	Non Sensit	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	11/3/2024		F	Reg	F	N	DS0087	1	1		########	11/2/2025	47.270192	6	Security	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	11/3/2024		F	Reg	F	N	DS0087	1	1		########	11/2/2025	47.270192	6	Security	N	N	N	N	N	N	
100003	30119				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	12/9/2018		F	Reg	F	N	DS0086	1	1			12/9/2018	74.782457	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	2/2/2017		F	Reg	F	N	DS0087	1	1			1/12/2025	40.464904	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	2/2/2017		F	Reg	F	N	DS0087	1	1			1/12/2025	40.464904	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		3/7/2027	3/9/2025	76.369712	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		3/7/2027	3/9/2025	76.369712	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001649	Mattavous	10/1/2016		F	Reg	F	N	DS0087	1	1			3/26/2023	68.128365	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001649	Mattavous	10/1/2016		F	Reg	F	N	DS0087	1	1			3/26/2023	68.128365	5	None	N	N	N	N	N	N	
100058	30117				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001649	Mattavous	4/25/2018		F	Reg	F	N	DS0086	1	1			4/14/2019	94.873558	5	None	N	Y	N	N	N	N	
100058	30117				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	########		F	Reg	F	N	DS0087	1	1			########	75.480769	5	None	N	Y	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		9/20/2026	9/22/2024	72.241346	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		9/20/2026	9/22/2024	72.241346	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001504	SISTRUNK I	10/1/2016		F	Reg	F	N	LA0001	1	1			5/3/2015	92.972115	1	Non Sensit	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00073160	McCoy Dox	########		F	Reg	F	N	DS0087	1	1			5/5/2013	71.457553	5	None	N	N	N	N	N	N	0
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00073160	McCoy Dox	########		F	Reg	F	N	DS0087	1	1			5/5/2013	71.457553	5	None	N	N	N	N	N	N	0
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00012034	Gumer Nat	10/1/2016		F	Reg	F	N	DS0087	1	1			5/19/2013	78.365385	1	Non Sensit	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00012034	Gumer Nat	10/1/2016		F	Reg	F	N	DS0087	1	1			5/19/2013	78.365385	1	Non Sensit	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001649	Mattavous	4/24/2022		F				DS0087	1	1				44.74	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001649	Mattavous	4/24/2022		F				DS0087	1	1				44.74	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		########	########	35.421635	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		########	########	35.421635	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	7/8/2018		F	Reg	F	N	DS0086	1	1			8/27/2023	89.663462	5	None	N	Y	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00075552	Coard Eric'	7/8/2018		F	Reg	F	N	DS0086	1	1			8/27/2023	89.663462	5	None	N	Y	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		########	9/18/2023	43.65625	6	Security	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		########	9/18/2023	43.65625	6	Security	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	########		F	Reg	F	N	LA0001	1	1		4/19/2026	4/14/2025	84.973077	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00077774	Daniels Lau	########		F	Reg	F	N	LA0001	1	1		4/19/2026	4/14/2025	84.973077	5	None	N	N	N	N	N	N	
300088	30110				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00084807	Smalls Mic	9/8/2025		P	Temp	I	Y	DS0087	1	1	3/13/2026		9/15/2025	26.049519	5	None	N	N	N	N	N	N	
300090	30114				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00084807	Smalls Mic	9/8/2025		P	Temp	I	Y	DS0087	1	1	3/13/2026		9/15/2025	26.049519	5	None	N	N	N	N	N	N	
100058	30117				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		9/6/2026	9/24/2023	48.474519	6	Security	N	N	N	N	N	N	
100022	30040				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00071651	Jefferson Li	########		F	Reg	F	N	DS0087	1	1		9/6/2026	9/24/2023	48.474519	6	Security	N	N	N	N	N	N	
300091	30111				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	########	43.65625	6	Security	N	N	N	N	N	N	
300091	30111				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	########	43.65625	6	Security	N	N	N	N	N	N	
300091	30111				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	########	43.65625	6	Security	N	N	N	N	N	N	
300091	30111				DJ0	GL	DJ1000000	Office of Pr	LOCDC00C	1133 15th :	00001504	SISTRUNK I	########		F				LA0001	1	1				61.92	6	Security	N	N	N	N	N	N	

300091	30111		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00075552	Coard Eric'	########		F	Reg	F	N	DS0086	1	1			########	62.5	6 Security	N	Y	N	N	N	N		
100022	30040		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	6/30/2022		F	Reg	F	N	DS0087	1	1			11/3/2024	49.679327	6 Security	N	N	N	N	N	N		
100058	30117		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	6/30/2022		F	Reg	F	N	DS0087	1	1			11/3/2024	49.679327	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		9/5/2027	9/7/2025	72.241346	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00093243	Ruffin Shell	5/4/2025		F	Reg	F	N	LA0001	1	1		9/5/2027	9/7/2025	72.241346	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	9/20/2021		F	Reg	F	N	DS0087	1	1		########	########	63.047115	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	9/20/2021		F	Reg	F	N	DS0087	1	1		########	########	63.047115	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	9/20/2021		F	Reg	F	N	DS0087	1	1		10/3/2027	10/5/2025	63.047115	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	9/20/2021		F	Reg	F	N	DS0087	1	1		10/3/2027	10/5/2025	63.047115	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	8/24/2025		F	Term	F	N	DS0087	1	1	10/8/2026	9/5/2027	9/7/2025	39.45625	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	8/24/2025		F	Term	F	N	DS0087	1	1	10/8/2026	9/5/2027	9/7/2025	39.45625	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00073160	McCoy Dor	9/20/2021		F	Reg	F	N	DS0087	1	1		7/25/2027	6/29/2025	47.270192	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00073160	McCoy Dor	9/20/2021		F	Reg	F	N	DS0087	1	1		7/25/2027	6/29/2025	47.270192	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	11/3/2024		F	Term	F	N	DS0087	1	1	########	########	########	36.430288	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00071651	Jefferson Li	11/3/2024		F	Term	F	N	DS0087	1	1	########	########	########	36.430288	6 Security	N	N	N	N	N	N		
300091	30111		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	2/11/2024	35.421635	6 Security	N	N	N	N	N	N		
300091	30111		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	10/6/2024	43.65625	6 Security	N	N	N	N	N	N		
300091	30111		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00097365	Hayes Anta	########		F	Reg	F	N	DS0087	1	1		########	########	43.65625	6 Security	N	N	N	N	N	N		
100058	30117		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00076963	Walker Cec	10/1/2022		F	Reg	F	N	DS0087	1	1		1/11/2026	1/14/2024	40.464904	6 Security	N	N	N	N	N	N		
100071	30040		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	3/24/2024		F	Reg	F	N	DS0087	1	1		3/22/2026	3/24/2024	53.349519	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00012034	Gumer Nat	1/5/2023		F	Reg	F	N	DS0087	1	1		1/10/2027	1/12/2025	66.434615	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00077774	Daniels Lat	4/13/2023		F	Reg	F	N	DS0087	1	1		5/17/2026	5/19/2024	49.679327	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00077774	Daniels Lat	4/13/2023		F	Reg	F	N	DS0087	1	1		5/17/2026	5/19/2024	49.679327	6 Security	N	N	N	N	N	N		
100003	30119		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00097365	Hayes Anta	10/5/2025		F	Reg	F	N	DS0087	1	1		5/2/2027	5/4/2025	32.710577	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00075552	Coard Eric'	6/6/2024		F	Term	F	N	DS0087	1	1	10/4/2026	9/6/2026	9/9/2024	44.861058	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00075552	Coard Eric'	6/6/2024		F	Term	F	N	DS0087	1	1	10/4/2026	9/6/2026	9/9/2024	44.861058	6 Security	N	N	N	N	N	N		
100003	30119		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00001649	Mattavous	8/6/2023		F	Reg	F	N	DS0087	1	1			12/5/2021	69.711538	6 Security	N	N	N	N	N	N	N	21
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00001649	Mattavous	8/6/2023		F	Reg	F	N	DS0087	1	1			12/5/2021	69.711538	6 Security	N	N	N	N	N	N	N	21
100058	30117		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	8/13/2023		F	Reg	F	N	DS0087	1	1		8/22/2027	8/24/2025	54.783654	6 Security	N	N	N	N	N	N		
100022	30040		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	8/13/2023		F	Reg	F	N	DS0087	1	1		8/22/2027	8/24/2025	54.783654	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00075552	Coard Eric'	2/23/2025		F	Reg	F	N	DS0087	1	1		5/2/2027	5/4/2025	63.047115	6 Security	N	N	N	N	N	N		
300088	30110		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00075552	Coard Eric'	2/23/2025		F	Reg	F	N	DS0087	1	1		5/2/2027	5/4/2025	63.047115	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00012034	Gumer Nat	10/1/2024		F	Term	F	N	DS0087	1	1	9/24/2026	8/22/2027	8/25/2025	48.474519	6 Security	N	N	N	N	N	N		
300090	30114		DJ0	GL	DJ1000000	Office of Pt	LOCDC00(	1133 15th !	00084807	Smalls Mic	2/23/2025		F	Term	F	N	DS0087	1	1	4/30/2026	4/5/2026	3/31/2025	26.882212	6 Security	N	N	N	N	N	N		

Security D	Budget Date	Company	Paygroup
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
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	10/1/2025	DCG	G1N
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	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
Not Requir	10/1/2025	DCG	G1N
Not Requir	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	
	10/1/2025	DCG	
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	

	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
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	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
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	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
Security	10/1/2025	DCG	G1N
Security	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N
	10/1/2025	DCG	G1N

OPC PERFORMANCE OVERSIGHT HEARING

Response to Governance & Personnel Question #30

OPC DATABASE

ATTACHMENT 4

Attachment #4

OPC Performance Oversight Hearing

Response to Governance & Personnel Question #30

OPC Database

Response to POH Question #30

Database (name)	Information Tracked	System Age	Public Access Policy
Consumer Information Database (CID)	•Consumer Inquiries and Complaints: Records inquiries and complaints received through multiple channels, including telephone, email, facsimile, in-person visits, and community meetings. •Community Outreach and Education: Tracks outreach and educational meetings attended by OPC staff, including meeting purpose, topics discussed, attendance, and concerns raised by community members. •Language Access Compliance: Records complaints in multiple languages to ensure compliance with the DC Language Access Law and equitable access for all residents. •Complaint Resolution Chronology: Documents the full lifecycle of each complaint, including interactions between the complainant, utility companies, and OPC staff. •Consumer Information: Captures detailed consumer data such as name, address, contact information, gender, utility account numbers, complaint type, utility involved, and resolution status. •Reporting and Data Retrieval: Supports the generation of daily, monthly, quarterly, and annual reports for management review and regulatory oversight.	**ServiceNow (Upgrade from CID)** System Age: The original CID was developed in 1998 and has been in use for approximately 28 years. To modernize and enhance system functionality, the CID was recently upgraded to the ServiceNow platform. **Key Enhancements and Capabilities:** •Improved Responsiveness: Enables faster intake, tracking, and resolution of consumer inquiries, improving overall service delivery. •Enhanced Information Management: Provides modern tools for managing consumer complaint data more efficiently and accurately. •Complaint Logging and Tracking: Maintains all core CID functions while improving reliability and usability. •Community Outreach Tracking: Allows detailed tracking of outreach activities, attendance, subject matter, and consumer concerns. •Language Access Tracking: Continues to support multilingual complaint tracking in compliance with the DC Language Access Law. •Complaint Resolution Timeline: Automatically creates a detailed chronology of complaint handling, documenting all interactions and actions taken. •Reporting and Analytics: Enables customized data extraction and reporting for operational and performance analysis. **Planned and Ongoing CMS Projects:** •Conduct a comprehensive review of the current ServiceNow configuration to identify complexity and performance bottlenecks and develop a prioritized refactoring plan. •Integrate a solar customer satisfaction survey into the Consumer Management System (CMS). •Integrate social services data to enhance consumer support and coordination. •Implement trend analysis to identify recurring consumer issues, monitor seasonal patterns, and proactively address emerging concerns. •Develop dashboards displaying daily accepted cases, unassigned cases, and the age of the oldest unassigned cases. •Create automated scripts to flag cases as high priority once they exceed defined age thresholds. •Implemented in the Water division and Adobe Digital Sign to have the consumer electronic OPC water consent form in the CMS system Ongoing enhancements to the Consumer Information Database and ServiceNow platform ensure OPC can continue to serve the public effectively while maintaining compliance with legal and regulatory requirements.	**Public Access Policy:** The Consumer Information Database (CID), including its ServiceNow implementation, is not accessible to the public. All information contained within the system is used exclusively for internal operations and is maintained as confidential to protect consumer privacy and sensitive personal information

OPC PERFORMANCE OVERSIGHT HEARING

Response to Governance &
Personnel Question #32

CONTRACTS & PROCUREMENTS FY25

ATTACHMENT 5

Attachment #5

OPC Performance Oversight Hearing

Response to Governance & Personnel Question #32

Contracts & Procurements FY25

Contracts

Vendor Name	Contract Number	Contract Purpose - Description of Services	Competitive or Sole Source	Contract Type	Original Contract	Contract Term Begin Date	Contract Term End Date	Contract Period	Contract Period Total Amount	Budgeted Amount	Actual Amount Spent	Contract Status	Funding Source (local, federal, private, special revenue, specify if ARPA)	Notes
Harrison Maldonado Associates	C12547	Language Translation	Non-Competitive/Sole Source	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 20,000.00	$ 20,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Professional Management Consulting	C17572	TO PLAN, EXECUTE, MANAGE THE LOGISTICS, TRAINING, COACHING AND ALL ASPECTS OF THE AGENCY'S STRATEGIC PLANNING RETREAT.	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 89,331.82	$ 89,331.82		Ongoing	Special Purpose Revenue (O-Type)	
Laz Parking	OPC-RY25-06	Multiple Language services	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 9,304.92	$ 9,304.92		Ongoing	Special Purpose Revenue (O-Type)	
Potomac Busnisess Solutions - Xerox Financial Services	02-0082634-002	Copier Lease C8155	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 12,714.00	$ 12,714.00		Ongoing	Special Purpose Revenue (O-Type)	
Synapse Energy Economics	K25-8	Expert services related to PJM's capacity market and associated issues and interconnection and interconnection processes and how they may or may not affect DC ratepayers	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 65,000.00	$ 65,000.00		Ongoing	Special Purpose Revenue (O-Type)	
RELX dba Lexus-Nexus	10000Y1JC	Legal Research Site /Lexis Nexis	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 38,697.24	$ 38,697.24		Ongoing	Special Purpose Revenue (O-Type)	
Synapse Energy Economics	K25-9	technical consulting services on the Residential Energy Affordability Study.	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 81,280.00	$ 81,280.00		Ongoing	Special Purpose Revenue (O-Type)	
GDS ASSOCIATES	K25-3	Engineering services	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 60,000.00	$ 60,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Total Office Products	C15449-V3	Educational/Outreach Materials	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 25,525.00	$ 25,525.00		Ongoing	Special Purpose Revenue (O-Type)	
Public Performance Management	C12289-V6	Copier Maintenance	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 8,863.64	$ 8,863.64		Ongoing	Special Purpose Revenue (O-Type)	
Rivendell International	OPC-FY25-5	Website Hosting	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 34,476.00	$ 34,476.00		Ongoing	Special Purpose Revenue (O-Type)	
Carahsoft Technology Corp	CW102620	OCTO -Annual Digital Communication Management - local inter agency	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 13,932.00	$ 13,932.00		Ongoing	Special Purpose Revenue (O-Type)	

MVS	C18863-V2	VEEAM, VMWARE,GRAMMARLY, CLIO ELITE, LOGIKULL, GOTO CONNECT, ADOBE ACROBAT, ADOBE PHOTOSHOP, ADOBE CREATIVE CLOUD, MANAGE ENGINE AD SYSTEMS MANAGEMENT SERVICES, MVISION EDR PREIMIUM EPP MCAFEE PUBLIC SECTOR, FORTISWITCH FORTICARE PREMIUM SUPPORT, DUO BEYOND SUBSCRIPTION, AZURE CLOUD SERVER	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 235,796.10	$ 235,796.10		Ongoing	Special Purpose Revenue (O-Type)	
Duncan & Allen	K24-5	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 20,000.00	$ 20,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Bion C Ostrander	k24-7	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
The DNA Group	OPC-DC-03-FY25	OFFICE 365 E3, Enterprise Mobility and Security E3, MICROSOFT TEAMS Audio Conferencing, M365 TEAMS PRO Software	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 60,690.00	$ 60,690.00		Ongoing	Special Purpose Revenue (O-Type)	
The DNA Group	OPC-DC SERVICE NOW O&M DUPPORT FY25 Q1-Q4	Service Now operations and maintenance support services	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 164,437.80	$ 164,437.80		Ongoing	Special Purpose Revenue (O-Type)	
Wilson Energy	K25-5	FERC/PJM WORK	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Brubaker & Associates	K25-6	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Speigel & McDiarmid	K25-1	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 148,333.00	$ 148,333.00		Ongoing	Special Purpose Revenue (O-Type)	
Rothschild Financial Consulting	k24-8	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Just One Technology	2025-CMS-01	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 75,600.00	$ 75,600.00		Ongoing	Special Purpose Revenue (O-Type)	
Data Net Sytems	C64	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 31,920.00	$ 31,920.00		Ongoing	Special Purpose Revenue (O-Type)	
Aspen of DC ADC Management	C17859	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 195,177.94	$ 195,177.94		Ongoing	Special Purpose Revenue (O-Type)	

Iron Mountain	C3KPR	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 7,209.24	$ 7,209.24		Ongoing	Special Purpose Revenue (O-Type)	
Rod Walker & Associates	K25-4	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 20,000.00	$ 20,000.00		Ongoing	Special Purpose Revenue (O-Type)	
MVS	C15336-V6	Multiple Language services	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 8,704.50	$ 8,704.50		Ongoing	Special Purpose Revenue (O-Type)	
Burness	K24-9	Professional services regarding climate change	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 10,000.00	$ 10,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Acadian	K25-2	Technical legal matters economic and rate design	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 20,000.00	$ 20,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Goldblatt Martin Pozen	OPC-FY25-GMP	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 40,000.00	$ 40,000.00		Ongoing	Special Purpose Revenue (O-Type)	
McCarter & English	K25-7	Legal Consultation	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
Senoda	C1783-V4	Printing Services for the Agency	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 18,262.00	$ 18,262.00		Ongoing	Special Purpose Revenue (O-Type)	
In The Public Eye	OPCELCFY25	Executive Leadership Coaching	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 35,200.00	$ 35,200.00		Ongoing	Special Purpose Revenue (O-Type)	
The Hamilton Group	C1805	Agency Supplies & Outreach Materials	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 15,987.00	$ 15,987.00		Ongoing	Special Purpose Revenue (O-Type)	
WMATA	OPC-FY25-4	Public transportation Fringe Benefits for eligible employees	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 12,000.00	$ 12,000.00		Ongoing	Special Purpose Revenue (O-Type)	
B&B Solutions	C18146-V4	Storage services for the agency	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 16,200.00	$ 16,200.00		Ongoing	Special Purpose Revenue (O-Type)	
B&B Solutions	C18146-V4	Horticultural Services for plants for the agency.	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 6,537.60	$ 6,537.60		Ongoing	Special Purpose Revenue (O-Type)	
B&B Solutions	C17989-V4	Enhanced Cleanings services for the agency	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 3,155.00	$ 3,155.00		Ongoing	Special Purpose Revenue (O-Type)	
Veritas Consulting Group	C13842-V3	Uninterruptible Power Supply. Power Distribution Units to power all crucial network devices in the AV rack. Labor to install and program the devices for optimal functionality and power protection services.	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 14,169.60	$ 14,169.60		Ongoing	Special Purpose Revenue (O-Type)	
Data Net Systems	C64	Hosting & Technical support of he etravel and the e-invoicing system	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 32,940.00	$ 32,940.00		Ongoing	Special Purpose Revenue (O-Type)	

Smile Therapy Services LLC	C19725	COMPREHENSIVE WELLNESS PROGRAM AND IMPLEMENTATION OF CARE-CENTERED SOLUTIONS SERVICE	Competitive	Firm Fixed Price		10/1/2024	9/30/2025	Base Year	$ 20,000.00	$ 20,000.00		Ongoing	Special Purpose Revenue (O-Type)	
TBD	TBD	Legal Services - LOCAL	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 44,024.17	$ 44,024.17		Ongoing	Local	
TBD	TBD	Legal Services - LOCAL	Competitive	Labor Hour		10/1/2024	9/30/2025	Base Year	$ 72,665.27	$ 72,665.27		Ongoing	Local	
								TOTAL	$ 1,883,133.84	$ 1,883,133.84				

OPC PERFORMANCE OVERSIGHT HEARING

Response to Governance &
Personnel Question #32

CONTRACTS & PROCUREMENTS FY26

ATTACHMENT 5

Attachment #5

OPC Performance Oversight Hearing

Response to Governance & Personnel Question #32

Contracts & Procurements FY26

Contract Number	Contract Purpose - Description of Services	Competitive or Sole Source	Contract Type	Original Contract	Contract Term Begin Date	Contract Term End Date	Contract Period	Contract Period Total Amount	Budgeted Amount	Actual Amount Spent	Contract Status	Funding Source (local, federal, private, special revenue, specify if ARPA)	Notes
C14245-V3	Language Translation	Non-Competitive/Sole Source	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
OPC-FY26-06	Multiple Language services	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 9,304.92	$ 9,304.92		Ongoing	Special Purpose Revenue (O-Type)	
02-0082634-002	Copier Lease C8155	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 3,314.00	$ 3,314.00		Ongoing	Special Purpose Revenue (O-Type)	
10000Y1JC	Legal Research Site /Lexis Nexis	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 38,697.24	$ 38,697.24		Ongoing	Special Purpose Revenue (O-Type)	
K26-1	Engineering services	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 60,000.00	$ 60,000.00		Ongoing	Special Purpose Revenue (O-Type)	
C15449-V3	Educational/Outreach Materials	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 25,525.00	$ 25,525.00		Ongoing	Special Purpose Revenue (O-Type)	
K26-5	Copier Maintenance	Non-Competitive/Sole Source	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
TBD	Website Hosting	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 34,476.00	$ 34,476.00		Ongoing	Special Purpose Revenue (O-Type)	
CW102620	OCTO -Annual Digital Communication Management - local inter agency	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 13,932.00	$ 13,932.00		Ongoing	Special Purpose Revenue (O-Type)	

C16367-V6	VEEAM, VMWARE,GRAMMARLY, CLIO ELITE, LOGIKULL, GOTO CONNECT, ADOBE ACROBAT, ADOBE PHOTOSHOP, ADOBE CREATIVE CLOUD, MANAGE ENGINE AD SYSTEMS MANAGEMENT SERVICES, MVISION EDR PREIMIUM EPP MCAFEE PUBLIC SECTOR, FORTISWITCH FORTICARE PREMIUM SUPPORT, DUO BEYOND SUBSCRIPTION, AZURE CLOUD SERVER	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 212,356.10	$ 212,356.10		Ongoing	Special Purpose Revenue (O-Type)	
K26-7	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
TBD	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
OPC-FY26-1	OFFICE 365 E3, Enterprise Mobility and Security E3, MICROSOFT TEAMS Audio Conferencing, M365 TEAMS PRO Software	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 78,203.00	$ 78,203.00		Ongoing	Special Purpose Revenue (O-Type)	
OPC_DC SERVICE NOW FY2026	Service Now operations and maintenance support services	Competitive	Firm Fixed Price		10/1/2025	9/30/2026	Base Year	$ 165,360.00	$ 165,360.00		Ongoing	Special Purpose Revenue (O-Type)	
K26-3	FERC/PJM WORK	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
TBD	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
K26-2	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 150,000.00	$ 150,000.00		Ongoing	Special Purpose Revenue (O-Type)	
K26-6	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 15,000.00	$ 15,000.00		Ongoing	Special Purpose Revenue (O-Type)	
2026-CMS-01	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 75,600.00	$ 75,600.00		Ongoing	Special Purpose Revenue (O-Type)	

C64	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 31,920.00	$ 31,920.00		Ongoing	Special Purpose Revenue (O-Type)	
C17859	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 95,832.00	$ 95,832.00		Ongoing	Special Purpose Revenue (O-Type)	
C3KPR	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 7,209.24	$ 7,209.24		Ongoing	Special Purpose Revenue (O-Type)	
K26-8	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
C15336-V6	Multiple Language services	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 8,704.50	$ 8,704.50		Ongoing	Special Purpose Revenue (O-Type)	
TBD	Professional services regarding climate change	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 10,000.00	$ 10,000.00		Ongoing	Special Purpose Revenue (O-Type)	
K26-4	Technical legal matters economic and rate design	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 25,000.00	$ 25,000.00		Ongoing	Special Purpose Revenue (O-Type)	
OPC-FY26-GMP	Legal Consultation	Competitive	Labor Hour		10/1/2025	9/30/2026	Base Year	$ 40,000.00	$ 40,000.00		Ongoing	Special Purpose Revenue (O-Type)	