BEFORE THE

PUBLIC SERVICE COMMISSION

OF MARYLAND

IN THE MATTER OF THE APPLICATION OF POTOMAC ELECTRIC POWER COMPANY FOR AN INCREASE IN ITS RETAIL RATES FOR THE DISTRIBUTION OF ELECTRIC ENERGY	))))))))	**Case No. 9655**

Surrebuttal Testimony of

Melissa Whited

On Behalf of

The Maryland Office of People's Counsel

April 20, 2021

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I. INTRODUCTION

Q. Please state your name, title, and employer.

A. My name is Melissa Whited. I am a Principal Associate at Synapse Energy Economics ("Synapse"), located at 485 Massachusetts Avenue, Cambridge, MA 02139.

Q. Have you previously submitted testimony in this proceeding?

A. Yes. On behalf of the Office of People's Counsel (OPC) I submitted direct testimony in this proceeding on March 3, 2021.

Q. What is the purpose of your surrebuttal testimony?

A. The purpose of my surrebuttal testimony is to respond to rebuttal testimony submitted on behalf of Potomac Electric Power Company (Pepco or the Company). My surrebuttal testimony rebuts several points from Mr. McGowan, Mr. Stewart, Ms. Bell-Izzard regarding my recommendations on distribution system planning and performance incentive mechanisms (PIMs), but it does not attempt to address every instance of disagreement. Thus, silence on any issue should not be interpreted as agreement.

Q. What materials did you rely on to develop your testimony?

A. The sources for my testimony and exhibits are public documents, responses to discovery requests, and my personal knowledge and experience.

Q. Was your testimony prepared by you or under your direction?

A. Yes.

II. SUMMARY OF CONCLUSIONS AND RECOMMENDATIONS

Q. Please summarize your main conclusions.

A. My conclusions are:

- The low risk of disallowance and rapid rate of cost recovery under the MYP construct exacerbates the incentive that Pepco has to over-invest in its system. For these reasons, additional measures are needed to protect customers, such as a reduced return on equity (ROE), integrated distribution system planning, and metrics or PIMs that encourage the Company to empower customers and seek cost-effective non-wires alternatives.
- Neither Pepco's proposal nor my proposal contain PIMs – rather they contain tracking metrics, which are a useful tool for increasing transparency and accountability.
- I maintain that Pepco's proposed tracking metrics are largely inappropriate for full PIMs with financial incentives. The metrics are in many cases redundant and would reward Pepco for activities that it is already committed to undertaking or could easily achieve.

Q. Please summarize your recommendations.

A. I offer the following recommendations:

1. The Commission should balance the benefits provided to shareholders through the MYP construct with ratepayer protections. In particular, I recommend that the Commission require Maryland utilities to conduct integrated distribution planning to enhance transparency and facilitate the determination of whether investments included

in MYPs are cost-effective relative to alternatives. My testimony provides multiple examples of how other jurisdictions have implemented integrated distribution planning.

2. The Commission should reject Pepco's proposed PIMs and instead consider metrics and incentives to encourage Pepco to (a) explore cost-effective non-wires alternatives (NWAs), and (b) empower customers to access and engage with their electricity usage data. I urge the Commission to adopt the tracking metrics I recommended in my direct testimony.

III. PEPCO'S MYP SHIFTS RISKS TO RATEPAYERS

Q. How does Pepco respond to your concerns that ratepayers will be saddled with high costs due to Pepco's inadequate distribution planning process?

A. First, Pepco Witness McGowan acknowledges the need for distribution system planning "to evolve with technology, policy, and customer needs," and states that Pepco is working to adopt new approaches that enhance planning and make it "more inclusive, data driven, and transparent."[1]

Mr. McGowan also claims that the MYP process increases transparency and accountability of Pepco's planning process, since the MYP is "forward-looking" and the Company has provided "significant information to the parties" as part of the MYP application.

[1] Rebuttal testimony of Pepco Witness McGowan, Case No. 9655, March 31, 2021, at 21.

Q. Does Pepco's response mitigate your concerns?

A. Not at all. The lack of transparency and insufficient consideration of alternatives in Pepco's planning process impacts customers through inflated revenue requirements in this rate case, and now more than ever due to the altered incentives provided by the MYP. Details regarding Pepco's failure to adequately consider lower-cost alternatives were provided in the direct testimony of OPC Witnesses Alvarez and Stephens and are further addressed in their surrebuttal testimony. Thus, while I appreciate that Pepco claims to be undertaking efforts to enhance its planning process, this does not assuage my concerns regarding Pepco's planning and investments in the instant proceeding, or the fact that ratepayers will pay for the investments approved in the MYP for many years to come.

Q. How does the fact that the MYP is forward-looking affect how the Commission should view Pepco's investment proposals?

A. By setting revenue requirements for the Company based on cost forecasts, the forward-looking nature of the MYP accelerates cost recovery and can shift substantial risk from shareholders to ratepayers, unless mitigated by other mechanisms.

Q. Why do you claim that the forward-looking nature of the MYP shifts risk from shareholders to ratepayers?

A. The MYP construct fundamentally alters the traditional approach to regulation. Under cost-of-service regulation, cost recovery for investments is only provided after assets are placed in service. In contrast, under the MYP, the utility's revenues each year are based on its forecasted costs and regulatory lag is virtually eliminated. The accelerated cost recovery and approval of forecasted revenue requirements provides greater certainty to investors and lessens the need for utilities to restrain their spending in order to achieve their allowed return. As noted by S&P Global, "Because of their ability to reduce regulatory lag and offer earnings enhancement opportunities, [Regulatory Research Associates] generally views the presence of alternative ratemaking plans as constructive from an investor viewpoint."[2] In other words, risk is shifted from shareholders to ratepayers.

Q. How can regulators balance this shift in risk to ratepayers?

A. There are several ratepayer protections that regulators can implement in order to balance shareholder and ratepayer interests. As noted in my direct testimony, regulators can take the following steps:

- Reduce the allowed ROE in recognition of the greater certainty and reduced regulatory lag provided by the MYP;
- Require transparent, robust integrated distribution planning processes with substantial stakeholder engagement and full consideration of non-wires alternatives; and
- Implement metrics and PIMs that encourage the utility to deliver greater value to customers.

[2] S&P Global, Market Intelligence, "Alternative Regulatory Paradigms Offer Utility Investors A Degree Of Certainty", April 21, 2020, available at https://www.spglobal.com/marketintelligence/en/news-insights/research/alternative-regulatory-paradigms-offer-utility-investors-a-degree-of-certainty.

Without fully transparent, robust planning processes or adjustment to the ROE, the forward-looking characteristic of the MYP noted by Pepco places ratepayers at greater risk that Pepco will over-invest in its system.

Q. Pepco Witness Stewart claims that the Company's planning process is already "robust" and designed to consider alternatives.[3] Does Pepco's planning process meet the criteria for a robust integrated distribution planning process?

A. No. Pepco's planning process is opaque, lacks stakeholder input, and does not adequately consider non-wires alternatives. For example:

- Detailed project justifications, quantified and qualitative benefits, risk assessments, and discussion of alternatives for Pepco's proposed capital investments are available only in confidential attachments, and were developed without stakeholder input.[4]

- There is little information provided by the Company regarding how distributed energy resources (DERs) and electrification will affect load forecasts, and no scenarios were presented to illustrate the impacts of various future DER trajectories.[5] Instead, the Company simply states that the solar and electric vehicle (EV) forecasts for its long range plan are based on historical solar and EV adoption and typical future adoption curves.[6]

[3] Rebuttal testimony of Pepco Witness Stewart, Case No. 9655, March 31, 2021, at 12.
[4] *See, e.g.,* Voluntary Response DR 1-48 .
[5] Voluntary Response DR 1-7 Attachment B provides the data and methodology regarding the Company's out-of-model adjustments for DERs. For solar and EV adoption, the MYP forecasts are based on linear historical adoption trends, while the LRP adjusts load further to account for "typical adoption curves."
[6] Voluntary Response DR 1-7 Attachment B.

- The only specific inclusion of NWAs in the Company's investment plans are the battery storage investments that the Company was required to undertake under the Energy Storage Pilot Project Act.

This planning approach differs substantially from the jurisdictions that have adopted more transparent, integrated distribution planning processes, in which:

- A range of DER growth trajectories and impacts on peak demand are considered;
- Third party DERs or portfolios of DERs are considered as options for NWAs; and
- There is meaningful stakeholder engagement.[7]

Q. **Can you provide any examples of how other jurisdictions have implemented modeling of various DER trajectories?**

A. Yes. Minnesota provides a good example of how jurisdictions have required consideration of various DER trajectories. The Minnesota Public Utilities Commission's IDP requirements for Xcel Energy state:

> In order to understand the potential impacts of faster-than-anticipated DER adoption, define and develop conceptual base-case, medium, and high scenarios regarding increased DER deployment on Xcel's system. Scenarios should reflect

[7] For a more detailed discussion of IDP, see GridLab (2019) "Integrated Distribution Planning: A Path Forward" available at https://gridlab.org/works/integrated-distribution-planning/

> a reasonable mix of individual DER adoption and aggregated or bundled DER service types, dispersed geographically across the Xcel distribution system in the locations Xcel would reasonably anticipate seeing DER growth take place first.[8]

Q. **Can you provide any examples for how jurisdictions have mandated the consideration of non-wires alternatives?**

A. Yes. In New York, the utilities are required to provide information that allows DER developers to offer non-wires alternatives. Specifically, the New York Public Service Commission's Order Adopting Distributed System Implementation Plan Guidance[9] requires the utilities to:

- Provide the information necessary for developers to offer solutions that can improve the efficiency of the system and add value to customers. The utilities should begin to offer as much information as is readily available to begin the process of supporting optimal DER investments.

- Include identification of specific areas in each utility's service territory where there is an impending or foreseeable delivery infrastructure upgrade need and where DERs would potentially provide delivery infrastructure

[8] Minnesota Public Utilities Commission, Integrated Distribution Planning Filing Requirements for Xcel Energy, Docket E002/CI-18-251, August 30, 2018, page 5.

[9] New York Public Service Commission, Order Adopting Distributed System Implementation Plan Guidance, Case 14-M-0101, April 20, 2016, Attachment 1, pages 8-9.

avoidance value or where DER may provide other reliability or operational benefits.

- Consistent with the transmission and distribution capital investment plans, the utilities should list specific infrastructure projects by location, and
  - indicate the potential for DER to resolve or mitigate forecasted system requirements, including the level of output needed over specific time periods and
  - describe the process used to identify the projects where DER solutions should be compared as potential alternatives to traditional grid infrastructure under varying scenarios of DER integration.

The New York utilities have a website in which information regarding current and upcoming NWA procurements for each utility is provided: https://nyrevconnect.com/non-wires-alternatives/.

Q. What approaches have other jurisdictions taken to incorporating stakeholder involvement into the IDP process?

A. States have taken a variety of approaches to stakeholder engagement, with many including multiple opportunities for stakeholder input. The table below summarizes the extent to which stakeholders are involved in the IDP process in several other jurisdictions.

Table 1. Examples of Stakeholder Engagement Approaches in Integrated Distribution System Plans

State	Stakeholder Involvement
New York	Numerous stakeholder engagement sessions are held throughout the distribution planning process. For example, at least 15 stakeholder sessions, webinars, or meetings were held in 2017 and 2018, with the presentations available here: https://jointutilitiesofny.org/stakeholder-engagement/2018
Hawaii	The Hawaiian Electric Companies' website states that the Integrated Grid Planning (IGP) process enables the company to engage with stakeholders and customers to gather their input and feedback throughout the IGP process. To this end, there is a "Stakeholder Council," working groups, and a technical advisory panel as well as broad public engagement. There were at least 13 meetings of the Stakeholder Council between August 30, 2018 and March 29, 2021, with meeting presentations and notes available here: https://www.hawaiianelectric.com/clean-energy-hawaii/integrated-grid-planning/stakeholder-engagement/stakeholder-council In addition, parties file comments in the IGP docket.
New Hampshire	In its 2020 Order No. 26,358 "Guidance on Utility Distribution System Planning" in docket 15-296, the New Hampshire Public Utilities Commission states "we believe there is benefit in undertaking a clearly defined stakeholder process that allows meaningful opportunities for input on decisions affecting utility planning and related investments before adjudication commences." (p. 24) Plans must include summary of stakeholder input, how stakeholder recommendations are incorporated into the final plan, or why a stakeholder recommendation was not incorporated into the final plan.
California	There is continuous stakeholder engagement and involvement in the process. As stated in the Final Guidance Order, "the DRP process should be a living one, where the Commission, the Utilities and stakeholders engage continuously to refine the activities and goals that are central to the DRPs themselves." (Assigned Commissioner's Ruling On Guidance for Public Utilities Code Section 769 – Distribution Resource Planning, R. 14-08-013, February 6, 2015, Attachment page 11.) In addition, stakeholders participate in the Distribution Planning Advisory Group (DPAG) to assess the utilities' Grid Needs Assessment (GNA) and Distribution Deferral Opportunity Report (DDOR) filings.
Michigan	Commission order notes that the determination of investments should be "informed by options presented by other technologies and solutions providers." Order, U-20147, August 20, 2020, p. 45. In addition, the PSC Order in Docket U-20147 dated April 12, 2018 invited stakeholder comment on existing distribution plans, followed by a technical conference, and then subsequent additional comments and discussion among stakeholders on expectations for next set of distribution plans.
Minnesota	Xcel must hold at least one stakeholder meeting prior to filing its plan to obtain input from the public. At a minimum, Xcel must seek input from stakeholders on the following topics: (1) the load and distributed energy resources (DER) forecasts; (2) proposed 5-year distribution system investments, (3) anticipated capabilities of system investments and customer benefits derived from proposed actions in the next 5-years; including, consistency with the Commission's Planning Objectives, and (4) any other relevant areas. Following the filing, the Commission issues a notice of comment period. If deemed appropriate by Commission Staff, additional stakeholder meetings may be held.

Q. What do you conclude regarding ratepayer protections?

A. The MYP construct provides substantial benefit to investors through enhanced certainty and accelerated cost recovery. These benefits should be balanced with ratepayer protections, such as a reduced ROE, rejection of investments that have not been adequately justified, as well as the introduction of a more collaborative, robust, and transparent planning process.

IV. PEPCO'S PROPOSED TRACKING METRICS

Q. Pepco Witness McGowan urges the Commission to reject consideration of OPC's tracking metrics on the basis that Commission Order 89638 states that "only the utility filing a rate case may propose a PIM."[10] Do you agree that the Commission should not consider OPC's tracking metrics?

A. No. Pepco's rationale for rejecting OPC's proposed tracking metrics is not applicable, since neither Pepco's proposal nor OPC's proposal contain PIMs. A "performance incentive mechanism," by definition, includes an incentive. The financial component of PIMs was recognized in the definition adopted by the PC 51 PIMs Working Group, which explicitly references financial rewards and penalties as a component of a PIM.[11]

Moreover, the Commission's PIMs Order discusses tracking metrics separately from full PIMs,[12] and the Commission explained its decision to not allow intervenor-sponsored PIMs at this time due to the "implications for an MRP overall and the ultimate

[10] Maryland Public Service Commission Order No. 89638, Case No. 9618, September 29, 2020 (hereafter "PIMs Order.")
[11] Direct testimony of Melissa Whited, Case No. 9655, March 3, 2021, page 16.
[12] PIMs Order, paragraphs 9 and 30.

rates, which could make consideration for the filing difficult."[13] Tracking metrics have no implications for rates. Thus, Pepco's recommendation that the Commission reject OPC's proposed tracking metrics should be ignored.

Q. Pepco Witness McGowan disputes your claim that the EV PIM is redundant.[14] Do you agree with Pepco's assessment?

A. No. My testimony pointed out that the reporting of information on EV charging station (EVCS) installations is redundant, as Pepco will already be reporting on the status of its public EVCS installations as part of its Semi-Annual Progress Report to the Commission. Pepco does not dispute this point; instead, Pepco simply notes that its goal of accelerating its public EVCS deployment is different than the current approved plan timeline. Further, Pepco does not deny that the installation of charging stations will be mostly complete by the time of the next rate case, making the future establishment of a PIM with financial incentives moot.

Q. Pepco Witness McGowan argues that achievement of the greenhouse gas (GHG) PIM is not a business as usual activity.[15] Do you agree with Pepco?

A. No. As shown in my direct testimony, Pepco has already achieved a 42 percent emissions reduction over four years, and Pepco's emissions were lower than its proposed 2021 target in 2017, 2019, and 2020.[16] Thus it is not at all evident that creating a PIM tied to very modest GHG reductions would encourage Pepco to expend more effort on GHG reductions than it is already doing. Further, providing a financial incentive for meeting its GHG targets

[13] PIMs Order, paragraph 25, page 12.
[14] Rebuttal testimony of Pepco Witness McGowan, Case No. 9655, March 31, 2021, at 20.
[15] Rebuttal testimony of Pepco Witness McGowan, Case No. 9655, March 31, 2021, at 20.
[16] Direct testimony of Melissa Whited, Case No. 9655, March 3, 2021, at 33-34.

is unlikely to provide incremental benefits to ratepayers beyond what would have achieved without a PIM.

Q. Pepco Witness Bell-Izzard states that your conclusions regarding the First Call Resolution (FCR) metric appear to be based on the Company's initial measurement process, rather than the Company's proposed metric for its FCR PIM.[17] Is this accurate?

A. No. My comments were not based on the initial measurement process in which phone numbers in the phone log were analyzed for repeat numbers.[18] Instead, my comments were based on the table below of post-call survey results, as provided in response to OPC Data Request 11-24(b) and shown below.

Table 2. Pepco Post-Call Survey Results

2020 Pepco Maryland Post Call Survey Results
(May- December)

Month	Total Post-Call Surveys Completed	FCR %
May-20	1374	85.5%
Jun-20	1543	84.3%
Jul-20	1795	84.2%
Aug-20	1626	82.7%
Sep-20	1313	86.4%
Oct-20	1220	86.1%
Nov-20	948	88.0%
Dec-20	1059	84.6%

However, it has come to my attention that Pepco has modified its post-call survey questions since December 2020,[19] and thus these results may not be reflective of performance going

[17] Rebuttal testimony of Pepco Witness McGowan, Case No. 9655, March 31, 2021, at 20.
[18] Rebuttal testimony of Pepco Witness Bell-Izzard, Case No. 9655, March 31, 2021, at 2.
[19] Response to OPC Data Request 11-24(b).

forward. Nevertheless, I maintain my initial recommendation that while this data is worthwhile to track, it should not be approved to become a PIM with financial incentives in the next rate case.

Q. Why do you maintain your position that the FCR metric should not become a PIM with financial incentives in the next rate case?

A. First, there is no evidence that a PIM is needed for performance in this area at this time. As I noted in my direct testimony, Pepco already has an overall goal to deliver premier levels of customer service, and it is not evident that additional incentives are needed to achieve the level of service that Pepco has targeted.

Second, Witness Bell-Izzard states that the cost of meeting the FCR targets is already included in Pepco's proposed MYP.[20] Pepco has not demonstrated a need for ratepayers to pay for both the cost of meeting a target (through Pepco's revenue requirement) and for additional financial incentives for meeting that same target under a future FCR PIM. Instead, incentives should be used to provide net benefits to ratepayers by driving the utility to attain better performance than it would have otherwise achieved, or to offset an existing disincentive.

Q. Does this conclude your surrebuttal testimony?

A. Yes, it does.

[20] Rebuttal testimony of Pepco Witness Bell-Izzard, Case No. 9655, March 31, 2021, at 5.

Potomac Electric Power Company's Application for an Electric Multi-Year Plan

Case No. 9655

Data Responses referenced in the Surrebuttal Testimony of
Melissa Whited

PE Response to OPC DR 11-24

PE Voluntary Response to DR 1-48

April 20, 2021

POTOMAC ELECTRIC POWER COMPANY
MARYLAND CASE NO. 9655
RESPONSE TO OPC DATA REQUEST NO. 11

QUESTION NO. 24

Refer to the testimony of Company Witness Bell-Izzard on page 21 regarding the FCR tracking metric.

a. Please provide the first call resolution (FCR) tracking data required by Commission Order No. 89629 and described by Company witness Bell-Izzard in Q/A 38.

b. Does the Company collect any other data on customers contacting Pepco's customer service team in addition to those required by Commission Order No. 89629? If yes, please list the data that the company collects and provide this data in machine readable format.

RESPONSE:

a. Pepco tracks FCR based on an automated analysis of the phone calls received by the Call Center. This metric is tracked at a Company level and is not currently available at the jurisdictional level.

2020 Pepco FCR Results

Month	**FCR Calls**	**Unique ANI (Total Calls)**	**% FCR**
January	71,653	95,196	75.27%
February	65,649	86,443	75.94%
March	63,563	79,271	80.18%
April	46,902	56,415	83.14%
May	41,405	50,023	82.77%
June	51,240	62,468	82.03%
July	57,455	73,370	78.31%
August	57,206	71,702	79.78%
September	52,472	64,555	81.28%
October	49,578	60,269	82.26%
November	44,286	55,410	79.92%
December	44,668	55,679	80.22%
YTD	**646,077**	**810,801**	79.68%

% FCR = FCR Calls/Unique ANI
FCR Calls = calls that appeared once within a three-day period
Unique ANI = Total calls transferred from IVR to a CSR (excludes calls from outages, Agency Assistance Numbers and internal numbers, and other numbers that are on the approved Exclusion List)

b. In addition to the automated analysis the Company uses to quantify FCR, since 2018 the Company has also performed a Post Call survey of its customers to determine their perspective of FCR, the results of which are indicated below.

2020 Pepco Maryland Post Call Survey Results
(May- December)

Month	Total Post-Call Surveys Completed	FCR %
May-20	1374	85.5%
Jun-20	1543	84.3%
Jul-20	1795	84.2%
Aug-20	1626	82.7%
Sep-20	1313	86.4%
Oct-20	1220	86.1%
Nov-20	948	88.0%
Dec-20	1059	84.6%

Due to technical issues (a platform change with the new telephony system), Post Call data results cannot be retrieved for results prior to May 2020. Due to a platform change with the telephony system, Post Call data results cannot be retrieved for results prior to May 2020.

The FCR post-survey question was modified in January 2021 to gather more granular information regarding the customer's perspective of FCR. The pre-January 2021 FCR question asked if the customer's issue or question was resolved during the call (Y/N). The modified question (as of January 2021) is described in the post-call script indicated in the response to OPC DR 11-25(a). This quantification of the number of contacts the customer had with the Company to resolve their inquiry is expected to reduce the FCR %, as the response goes beyond asking about the most recent call, and incorporates all contacts needed for resolution.

SPONSOR: Morlon D. Bell-Izzard

POTOMAC ELECTRIC POWER COMPANY
MARYLAND CASE NO. 9655
VOLUNTARY DISCOVERY DATA REQUEST NO. 1

QUESTION NO. 48

Provide the presentations requesting approval of capital projects over one million dollars.

RESPONSE:

"Darnestown Reauthorization - PHI BOD - August 2016", Attachment A (Confidential);
"06 - Pepco MD Norbeck Area Plan PRC (Feeder-level Work) - Final 101217_1751", Attachment B (Confidential);
"06 - Sligo -Linden Presentation - AIC 090517", Attachment C (Confidential);
"07- Pepco MD Crain Hwy Area Plan PRC (Feeder-level Work) - Final 101217_1751", Attachment D (Confidential);
"Install Primary Duct Bank for MSHA MD 210 OH to UG Relocation - Phase 3 - PRC 2017.2 2-9-17 401pm", Attachment E (Confidential);
"M1 Sligo -Linden Presentation - PRC Draft 0914171705", Attachment F (Confidential);
"Rockville Pole Barn - Phase 2 - AIC 2017 6-7-17 556pm", Attachment G (Confidential);
"Takoma -Sligo - Phase 3 PARC-RMC Approval - Revised Cost Estimate - July 2017 Email Review", Attachment H (Confidential);
"Takoma Substation Land Purchase - Phase 3 - PRC 2017.5.15 5-12-17 214pm", Attachment I (Confidential);
"W05 - PRC_Bells Mill SUB. 121_Replace T10.20170919 0919171723", Attachment J (Confidential);
"White Flint Sub - Phase 2 PARC - June 2017 R1", Attachment K (Confidential);
"09 - Rockville Ops Construct Pole Barn (CMP156)-Ph3-11.8.18_1916", Attachment L (Confidential);
"10 - Bethesda 3T Replacement Project (UDSPRD8MB1)-Ph3-12.11.18", Attachment M (Confidential);
"19 - Apex Building (Office Tower) - NBC (DLPCS6M013)-Ph3-11.13.18_1255", Attachment N (Confidential);
"20 - Route-1 Relocation. WR3541195 -13 kV (DLPCH0M007)-Ph3-8.1.18_1027", Attachment O (Confidential);
"PG HOSPITAL MEDICAL CENTER PROJECT - Phase 3 PARC Approval - JULY 2018", Attachment P (Confidential);
"PHI Work Management - PARC Phase 3 Reauthorization Approval - Sept 2018", Attachment Q (Confidential);
"White Oak - Phase 3 PARC Approval - March 2018", Attachment R (Confidential);
"01 - ITN 65015 - Pepco White Flint Substation 229 - PRC (Phase 3) -9.6.19_1452", Attachment S (Confidential);
"09 - ITN 61812 -Metzerott T1 Replacement -Ph2 -3.11.19_0809", Attachment T (Confidential);
"09 - ITN TBD - Control Center Emergency Generator Upgrade - Ph3 -8.2.19_1117", Attachment U (Confidential);

"10 - ITN 64808 - PHI DA Server Farm Project - Ph3 - 8.5.2019_1113", Attachment V (Confidential);
"10 - ITN 72181 - Leisure World Transformer Replacements -Ph2 -3.7.19_1536", Attachment W (Confidential);
"11 - White Flint New Substation-Ph3-12.28.18_1046", Attachment X (Confidential);
"20 - ITN 61821-7359_Wisconson_Ave_ph3 - 3.8.19_1323", Attachment Y (Confidential);
"22 -ITN 72216 - AIC_MARRIOTT SERVICE (OFFICE HOTEL BUILDING)Ph3-3.8.19_1323", Attachment Z (Confidential);
"ITN 72181-Leisure World - Type 1- Ph3 PCC 2019-12-11_1506", Attachment AA (Confidential);
"PHI Care Center Telephony - PARC Phase 3 - April 2019", Attachment BB (Confidential);
"PHI Cascade - PARC Phase 3 Re-Auth - April 2019", Attachment CC (Confidential);
"04 - 69124_Final_69060_rev3 0731_928", Attachment DD (Confidential);
"06_ITN 70243 - Feeder 69025 PCC Presentation -ph2 - 8.13.20", Attachment EE (Confidential);
"65385 PHI PCC SAP and Itron (MDM) Upgrade v3", Attachment FF (Confidential);
"65401 PEPCO ONS Replacement Ph 1 and 2 PCC Preso", Attachment GG (Confidential);
"65407_65411 Oracle NMS Project Ph 3 PCC", Attachment HH (Confidential);
"66639 Pepco Purchase of EOB TSO - March PCC - Final Draft Ph 3 031320 537", Attachment II (Confidential);
"66685 Maryland Smart Streetlights Ph.3 PCC 06.17.2020 revised", Attachment JJ (Confidential);
"69079 PCC-Presentation-Updated-8-13-2020", Attachment KK (Confidential);
"70045 Bells Mill_EU-Concurrence-Project-Status", Attachment LL (Confidential);
"EU Mid-Atlantic TSO - MOP Phase 3 - 2020-02-18", Attachment MM (Confidential);
"2019 May 21 PHI BOD oneMDS Phase 3A Authorization 04.23.19", Attachment NN (Confidential);
"BIDA Grid T_D Domain-PHI CEO Phase 3_vF", Attachment OO (Confidential);
"EMS Consolidation Implementation MOP PARC Phase 3", Attachment PP (Confidential);
"EU Analytics - AMI Phase 3 Auth MOP PARC v15", Attachment QQ (Confidential);
"PHI BoD Meeting ADMS Ph3 Presentation_Final_2020.05.07", Attachment RR (Confidential);
"PHI LLO 2020 PCC", Attachment SS (Confidential); and
"PHI UI Planner Redesign - Phase 3 Final", Attachment TT (Confidential).

SPONSOR: Robert S. Stewart