July 9, 2020

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

RE: FC 1156, Application of the Potomac Electric Power Company for Authority to Implement a Multiyear Rate Plan for Electric Distribution Service in the District of Columbia

Dear Ms. Westbrook-Sedgwick:

I am writing on behalf of ANC3B to recommend strongly that the Public Service Commission (PSC) not approve Pepco’s request to institute a Multi-Year Rate Plan (MRP) as part of the current proceeding.

We understand that a large proportion of District residents and businesses have been severely affected by the COVID-19 crisis, through lost jobs and income, disrupted schedules for school and child care, changing transportation options, and other difficulties that will last for many more months and potentially years. For that reason, Pepco’s offer to provide short-term benefits to ratepayers in the form of a rate freeze through January 2022, payment plans, arrearage programs, and other customer assistance could be beneficial to residents, businesses, and other organizations in the community adversely affected by the current public health emergency. But if the PSC would like to approve those programs, it is not necessary at the same time to approve the long-term changes in ratemaking processes that Pepco has put forward in its various proposed MRPs.

Pepco’s MRP proposals raise longer term questions about many details related to forecasting, reviewing future investment needs, allocation formulas, incentives for efficiency and improved service, and processes for ensuring reasonable and rates for customers. All these elements demand fuller review by the Office of People’s Counsel, legal and economic and financial experts, the public, and the PSC, which we urge the Commissioners to provide in a separate process over the coming year, as we all gain more understanding of the effects of COVID-19 and the future course of the District’s economy and energy sector.

We urge you to consider the serious effects of the coronavirus emergency as well as the long-term needs of Pepco ratepayers and the District, as you complete your review of the current case. For the long-term interests of that you are committed to serving, we recommend that you adopt effective measures to protect consumers in the short run and allow Pepco to cover the costs it has already incurred in providing service.
to customers, but reject Pepco's proposed multi-year rate plan. That will serve the public and allow for better assessment of future systems for ratemaking, when everyone involved and affected will have more information and more time to conduct the necessary review.

Thank you for your consideration.

Sincerely,

Brian Turmail
Chairman

This letter was approved by a vote of 5-0 at a duly noticed public meeting of the Commission on July 9, 2020, at which a quorum was present. (Three of the five members constitute a quorum.) With this vote, the Commission also designated the Chairman or his designee to represent ANC3B on this matter.