

August 1, 2013

Mr. David J. Collins
Executive Secretary
Public Service Commission
6 Paul Street
Baltimore, Maryland 21202-6806

RE: MPSC # 413180707-L

Dear Mr. Collins:

We write on behalf of the Carderock Springs Citizens' Association (the Association) to request that the Maryland Public Service Commission (the Commission) undertake an investigation and open a formal case to determine whether a series of fires and other damaging electrical surges experienced in our neighborhood are related to aging or the design of the electrical distribution system, the recent installation of smart-meters, or other electrical service or maintenance problems.

We have sent the PSC numerous letters, and most recently received a July 26 response from Ms Linda Hurd. Although Pepco has, in this latest response, provided some of the additional materials we have repeatedly requested, it continues to refuse to provide much of what we require. We are disappointed and disturbed that the Commission has thus far not taken action to ensure that a complete response to our information requests was provided by Pepco, and are hard-pressed to understand just how the Commission can have made any findings related to this case absent an evaluation of the necessary information.

While we appreciate Pepco's stated intent to arrange a meeting with our community and would welcome such a meeting, we do not believe that a meeting can substitute for the documentation we have requested. Therefore, we again ask that the Commission undertake its own investigation and open a formal case, obtain the data repeatedly requested from Pepco, and to direct any and all necessary repairs in order to avoid further delay and risk additional harm to public health and safety in our community.

In our April 5, May 1 and June 6 letters (see the Attachment for a record of all correspondence) we provided the Commission with documentation related to the recent surge in the numbers of electrical fires that were preceded by flickering lights or power surges, and single-home brownouts or power surges that have destroyed furnaces and other appliances in our community. We requested that the Commission take particular

notice of the dramatic increase in frequency of such events in 2012-13, as well as the geographic proximity of the residences that experienced many of these events.

Our letter asked that the Commission undertake an investigation that included a number of documents and materials. What follows below is a list of what we requested, and what Pepco has provided (yellow):

- A review of all Pepco work orders related to electrical work performed in the neighborhood, including work performed on service lines at the boundary of the neighborhood.
- A review of Pepco voltage records in the days and hours preceding all recent electrical incidents and electrical fires.
- A review of all Pepco records associated with the installation of all smartmeters in the neighborhood, as well as any other neighborhood maintenance performed by Pepco that may have been unrelated to a customer-generated service complaint or problem.

The Association additionally provided, in its June 6 letter, the following responses to the materials that Pepco did provide and were submitted to the Association on May 30. Again, the materials that Pepco has provided are highlighted in yellow:

1. Pepco provided the Commission with a reliability study of the three feeders that service our community. While this study summarizes the numbers of sustained outages and momentary outages experienced on each feeder, it does not provide the dates and times at which these outages occurred. The information is thus useless for purposes of establishing or ruling out a temporal correlation between these outages and the electrical surges and fires in our neighborhood. In addition to the materials originally requested by the Association, we ask that the Commission direct Pepco to provide the date, time, cause, and duration of each outage (both sustained and momentary) experienced on each feeder. Since Pepco's response also noted that it had taken specific mitigating reliability measures on these three feeders, we also request a list of each such measure and the date(s) on which each was undertaken. The Association also requests a summary and timeline of all work proposed under Pepco's Reliability Enhancement Plan for Carderock Springs.
2. Pepco asserted in its response to the Commission that it does not "have the capability to retrieve voltage information 'after the fact'." The Association notes that Pepco installed distributed automation and smart meters in our community prior to most of these fires and other incidents, and consequently should have records of voltage surges that occurred subsequent to that installation. It unquestionably would have the sort of service records, work orders and smart meter installation records the Association has also requested. Moreover, COMAR 20.50.04.11 requires utilities to "keep such records of customer complaints as will enable it to review and analyze its procedures and

actions as an aid in rendering improved service,” and according to a report¹ prepared by Commission staff, “the four investor-owned utilities (“IOUs”) investigate and maintain records of customer complaints that allege damages to customer property from electrical surges.” Both the Association and Pepco are aware that at least some of the electrical surges experienced in our community were reported to Pepco, and thus should be part of the records required under COMAR to be kept. Specifically, on August 11 2012, Teresa Magone at 8013 Glenmore Spring Road experienced a major electrical disruption before the fire at 8015 Glenmore Spring Road was reported to 911, and she called Pepco to report it at 3:09 PM that day. Yet Pepco has failed to provide even that record, which the Association knows exists. Additional damages caused by power surges have also been experienced by residents of our community (please see attached materials for a list) but Pepco has not provided records related to those either. The Association asks the Commission to use its authority to obtain all of the materials requested by the Association, which the Association believes Pepco is improperly withholding, or, if Pepco is in violation of the COMAR requirements to maintain such records, to undertake an appropriate enforcement action.

3. Pepco’s response states that “Pepco was not contacted by an insurance company claiming any wrongdoing by Pepco or seeking any recovery from Pepco, which is further support that Pepco was not responsible for any of the claimed occurrences.” The Commission’s May 30 response additionally states that it “lacks the authority of the Courts to grant compensatory damages to parties claiming injury...” The Association notes that while Pepco’s statement is inaccurate², the Association is not a party to any claim of injury, and nor does its request to the Commission include a request that any compensatory damages be awarded. Rather, our sole request is that the Commission open a formal case in order to properly investigate and identify the cause of the recent fires and electrical damages in our community and take any steps needed to protect against further such incidents.

According to the Commission’s website, “the mission of the Maryland Public Service Commission is to ensure safe, reliable, and economic public utility and transportation service to the citizens of Maryland. To achieve this, we will: Create standards and policies that protect the safety of the public.” We request that you fulfill this mission and take steps to ensure a complete investigation and direct any necessary remedies to prevent future harm to public health and safety in our community that could be caused by additional electrical failures. We trust that the Commission will launch its own investigation and formal case, obtain the appropriate records from Pepco and make its own determinations. Our community deserves nothing less.

¹ <http://webapp.psc.state.md.us/intranet/Reports/SB%20692%20Report.pdf>

² According to communications from one of the relevant insurance providers, it has not released Pepco from any involvement in the fire.

Thank you very much for your consideration of this request. For more information, please contact Dr. Phil Rider at pmrbthmd@yahoo.com or phone 301-469-0231 or Dr. Michal Freedhoff at michalilana@earthlink.net or 301-767-9721.

Sincerely,



Dr. Phil Rider
President
Carderock Springs Citizens' Assoc.



Michal Freedhoff, Ph.D.
Chair, Public Works Committee
Carderock Springs Citizens' Assoc.