

# THE PALISADES CITIZENS ASSOCIATION



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PHONE/FAX: 202-363-7441 WWW.PALISADESDC.ORG

September 14, 2009

Michael W. Maxwell, Vice President  
Asset Management  
Pepco Holdings, Inc.  
701 8<sup>th</sup> Street NW  
EP8022  
Washington DC 20068

Vincent Orange, Vice President  
Pepco Region  
Pepco  
701 8<sup>th</sup> Street NW  
EP 9207  
Washington DC 20068

Dear Messrs. Maxwell and Orange:

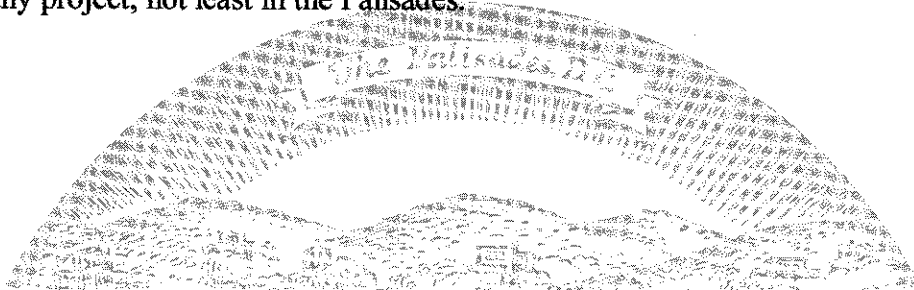
Thank you for your letter of August 24 (copy attached), purportedly responding to the Palisades Citizens Association's letter to both of you of July 27.

Unfortunately, it appears to be a "super-copy" of previous correspondence sent to Councilmember Cheh on August 18. Vincent Orange's letter does not provide any additional information promised by Pepco representatives during the "walk-throughs," nor does it address any of the issues and questions we raise in our letter of July 27, which is attached to refresh your memory.

The unresponsive nature of your response speaks volumes about Pepco's dialogue with the community. We want to collaborate with you on improving reliability, yet simply repeating plans decided by Pepco – without neighborhood consultation – is not a dialogue, it is a monologue.

We also note that Mr. Maxwell promised to notify the community should Pepco choose to end its self-proclaimed "moratorium" on the project. This did not occur.

We resolutely believe it is in Pepco's interest to engage the community in a dialogue, and note that Pepco's unwillingness to communicate with the community – something that should have occurred months ago – is one of the reasons for the controversy over Pepco's plans. Working with the community, and being responsive to community concerns, should be part of Pepco's due diligence in any project, not least in the Palisades.



Pepco's unwillingness or inability to provide critical - and promised -- information to the community continues to damage its credibility. For example, Pepco announced that its decision that only two trees on MacArthur Boulevard would be removed, with at least a dozen more to be "substantially pruned," while refusing to provide additional detail despite our repeated requests both orally and in writing. To be frank, this approach does Pepco's well-intentioned initiative to improve electrical reliability a disservice.

The community can and should be Pepco's partner in this effort. We again urge Pepco to engage in a real dialogue with the community, and respond to our legitimate questions and concerns.

This can be a win for both reliability and protection of our green spaces, and there is no need to waste our time with non-communicative repeating of past letters. Please devote the time to answering our letter and building real consultation with your Palisades customers.

Very truly yours,



William Spence Spencer  
President

CC: ANC 3D Commissioners

- Adrian Fenty, Mayor
- Vincent Gray, Council Chairman
- Mary Cheh, Councilmember
- Phil Mendelson, Councilmember
- Muriel Bowser, Councilmember
- Betty Ann Kane, Chairman, Public Service Commission
- Elizabeth Noel, Office of People's Counsel
- Gabe Klein, DC Department of Transportation
- George Hawkins, DC Department of the Environment
- Earl Eutsler, Urban Forestry Administration
- Mark Buscaino, Executive Director, Casey Trees



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**Vincent B. Orange, Sr.**  
Region Vice President  
District of Columbia

202-872-2367  
202-872-2482 Fax

August 24, 2009

William Spence Spencer  
President  
The Palisades Citizens Association  
P.O. Box 40603  
Palisades Station  
Washington, DC 20016

**Re: Palisades Enhanced Reliability Project Status Update**

Dear Mr. Spencer:

This letter serves as Pepco's response to your letter dated July 27, 2009. We appreciated your time in working with us to organize the two walk-throughs on July 17th and July 20th, respectively. These two events provided members of the affected community an opportunity to obtain additional information on the project and to actually tour the scheduled work route. Pepco will commence the implementation of Phase I of the "Palisades Enhanced Reliability Project" on September 1, 2009, and Phase II of the final work plan is scheduled to commence in 2010. For informational purposes, Phase I encompasses all facets of work to be executed on the "Old Trolley Line" and Phase II encompasses all work to be performed on MacArthur Boulevard.

By way of background, as a result of deteriorating electric reliability performance in the Palisades area and the resulting concerns of the community, as expressed on October 6, 2008, Pepco conducted an assessment of the distribution system that supplies electricity to this area and took certain corrective actions to address immediately identifiable issues. Subsequently, Pepco presented its comprehensive plan for improving electric reliability to the Palisades community at the Advisory Neighborhood Commission 3D meeting on July 1, 2009. As a direct result of that meeting, Pepco re-assessed its work plan in an effort to mitigate the devised plan's impact on "legacy" trees on MacArthur Boulevard. We are pleased to announce that the original design identified 12 trees for removal; however, the revised plan would result in the removal of only 2 trees and another 14 would be required to be heavily trimmed.

It is important to note that Pepco's performance and reliability data conclusively reveals that two of the three feeders that serve this community are among the top ten worst performing feeders in the District of Columbia. One component of Pepco's Reliability Program is the company's annual identification of the two (2) percent least reliable or worst performing feeders in the city. Upon identification, remedial action is taken to

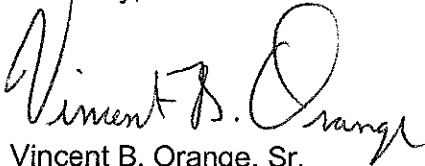
Mr. William Spence Spencer  
Page 2  
August 24, 2009

improve their performance. Pursuant to requirements set forth by the District of Columbia Public Service Commission, Pepco is required to develop and implement work-plans that would remove these identified feeders from the "worst performing" list. Thus, identified feeders should not continue to be identified on this list from one year to the next. Pepco's work plan will enhance the performance of these feeders, resulting in improved service reliability for all residents in this area.

Pepco has made direct contact with all affected property owners that are adjacent to the "Old Trolley Line." It is important to note that the property owners are not disputing the fact that the right of way is public space. In addition, the Urban Forestry Administration acknowledges the same. However, a few property owners have expressed concerns, relative to potential disruptions that will occur. We will be resuming all scheduled maintenance work on the "Old Trolley Line" public right of way immediately. This non-capital related work was temporarily halted while we engaged in critical outreach to the Palisades community concerning the scope of the Enhanced Reliability Project.

We will work to keep you informed and updated on the status of our work throughout the various implementation stages. Should you have questions in the interim, please do not hesitate to contact me at (202) 872-2367.

Sincerely,

A handwritten signature in black ink that reads "Vincent B. Orange, Sr." The signature is written in a cursive style with a large, looped "O" at the end.

Vincent B. Orange, Sr.  
Region Vice President  
District of Columbia

# THE PALISADES CITIZENS ASSOCIATION

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July 27, 2009

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Vincent Orange  
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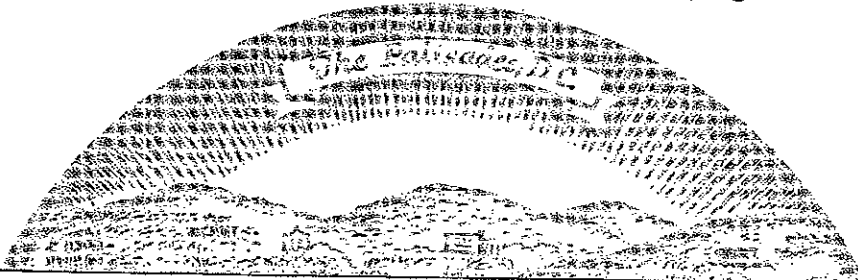
Dear Messrs. Maxwell and Orange:

While the Palisades Citizens Association (PCA) appreciates the time and effort that Pepero has applied towards the issue of improved reliability of electrical service in the Palisades, **the PCA has grave reservations about both the rationale and scope of the proposed changes.** This letter sets out our concerns, reviews some of the commitments Pepero has made to the community over the past three weeks, and seeks answers to questions that have arisen.

1) The rationale for the project has not been clearly proven by data. Pepero representatives have stated that the removal of hundreds of trees along the trolley line and removal/severe pruning of trees on MacArthur Boulevard is necessary in order to "increase reliability." However, the only data provided to the community shows that that in Ward 3, just 40% of the outages in the last two years have been caused by trees. Last week, Pepero representatives agreed to provide us a two-year history of all outages in the Palisades. Specifically, this data should include:

- Dates and times of outages/disrupted service;
- Pole locations;
- Length of outage;
- Causes; and
- Number of houses/businesses affected.

If we can see, for example, that trees on the trolley line on one block caused 29 outages, each lasting several hours, then we as the neighborhood might support significant tree removal or pruning in that area. If, however, trees on a block have not been involved in power outages, then those trees should not be threatened simply in the name of preventing future outages. Similarly, if the data indicate that aging transformers are the problem, then it should be the transformers, not the trees, to go.



*Serving the neighborhoods bounded by the Potomac River, Foxball Road, Loughboro Road and the District Line.*

2) When Pepco evaluated the problem of reliability, Pepco did so only through the lens of reliability; they did not consider other stakeholders and issues, nor have they sufficiently explored synergies with other agencies. We need a more strategic dialogue for the long term benefit of both Pepco and the neighborhood. We would like to see representatives of the Public Service Commission, Verizon, Comcast, DDOT, WASA, the PCA, Urban Forestry Administration, DC Trails, the Office of People's Counsel, Councilmember Cheh, Councilmember Mendelson, and our Advisory Neighborhood Commission have a seat at the table as part of this effort to develop a long-range vision.

3) The PCA seeks information on other alternatives as well. We are not convinced that a continuous run of the thick, 3-wire preassembled cable (PAC) down MacArthur is the only way to improve reliability. Although Pepco may not like the idea, it is possible to have PAC in certain blocks and not in others. It would also be possible, as Earl Eutsler of DC's Urban Forestry Administration suggested, to run PAC down the trolley line instead of MacArthur. Mr. Eutsler suggested that replacing bare wire with insulated tree wire might suffice in other areas. All alternatives need to be considered. Mr. Eutsler also noted that the strength of the PAC cable could, ironically, lead to new dangers: if a large tree branch falls on PAC, the PAC cable would hold, but the poles at either end could be toppled.

As part of the process of identifying alternatives, we would like to see specific information on the real cost of burying cable underground for both MacArthur and the Trolley Line. Separate analysis for both options appears to not have been completed. A "\$48 million" dollar number has been thrown around, but according to Pepco representatives this figure is a only generic one, and one that has been disputed by DC's Office of People's Counsel.

We would also appreciate an analysis of the costs of removing the feeder line from MacArthur and shifting it back to the trolley line, thereby providing a long term alternative to at least the MacArthur Boulevard side of the question.

We are cautiously optimistic to hear the news that only two trees on MacArthur are now targeted for removal, with "substantial pruning" for as many as 15 additional trees on the Boulevard. However, as I am sure you recognize, "substantial pruning" can mean anything. Pepco representatives have promised detailed information on the specifics of this new plan, and we would like to have the opportunity to review this information to determine the consequences for the aesthetics and long-term viability of the trees.

4) Trolley line right-of-way issues remain unresolved and are of serious concern to the affected homeowners. In late June we received a document from Vincent Orange stating that of 31 properties that abut the old Trolley Line, right of way must be defined for 23 of these. Subsequently, we have been told that Pepco has agreed with the affected homeowners on right of way in all but two or three cases. Please provide information on the status of Pepco's effort to clarify the trolley right of way, with respect to all properties affected. Pepco representatives have also promised to provide the number of trolley line poles proposed for replacement.

5) Rationale for the project has been touted as "increasing reliability," but Pepco is including upgrading capacity in its plans. We believe Pepco is playing on the frustrations of some residents and businesses who have suffered outages to push through a project that would not be acceptable if termed an "upgrade." We need to distinguish between the two issues.

6) Finally, as agreed at the walkthroughs, we would like for Pepco's commitment to a moratorium on the project to be better defined, and in writing. Under what conditions would the project be started back up? How and when would the Palisades Citizens Association and our ANC be notified? How much advance notice would be provided?

Again, we appreciate that Pepco has focused on bringing more reliable power to the Palisades. That said, the Palisades Citizens Association certainly believes that **decisions with such sweeping impacts on the character of our community must be made deliberately and after stakeholders have had the chance to evaluate all options. We know that Pepco has plans to go into the secondary streets for reliability improvements and tree removals in a Phase 2 of work – and we believe strongly that conversations held now are critical to minimizing miscommunication and disagreements over the next few years.**

I apologize for the length of this letter, which should illustrate the many legitimate questions and concerns the community has with this project. In the process, we know that we can – together - bring reliable electric service to the Palisades while retaining a green community. We thank you again for all your attention to our neighborhood.

Very truly yours,



William Spence Spencer  
President

CC: ANC 3D Commissioners  
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