

The Palisades Citizens Association

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Dear Messrs. Maxwell and Orange:

While the Palisades Citizens Association (PCA) appreciates the time and effort that Pepco 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 Pepco 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. Pepco 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, Pepco 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.

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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

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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
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