## GOVERNMENT OF THE DISTRICT OF COLUMBIA OFFICE OF THE ATTORNEY GENERAL



KARL A. RACINE ATTORNEY GENERAL

**Public Advocacy Division Social Justice Section** 

**ELECTRONIC FILING** 

August 12, 2020

Ms. Brinda Westbrook-Sedgwick Public Service Commission Of the District of Columbia Secretary 1325 G Street, NW, Suite 800 Washington, DC 20005

RE: FORMAL CASE NO. 1156 – IN THE MATTER OF THE APPLICATION OF 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:

On behalf of the District of Columbia Government (DCG), please allow this letter to serve as an expression of DCG's support for the relief requested in the Office of the People's Counsel for the District of Columbia, the Apartment & Office Building Association of Metropolitan Washington, the General Services Administration, the District of Columbia Water and Sewer Authority, Baltimore Washington Construction and Public Employees Laborers' District Council, the Maryland DC Virginia Solar Energy Industries Association, and the Small Business Utility Advocates Joint Protest of Pepco's July 31, 2020 Motion to File Supplemental Testimony and Joint Motion to Dismiss MRP Enhanced Proposal, to Direct Withdrawal of Pepco's Rate Case Application, and for Additional Relief (Joint Motion) filed on August 11, 2020, in the above-captioned proceeding.

DCG agrees that Pepco has failed to satisfy its burden to provide a credible, supported proposal that meets the Public Service Commission's (PSC) standards for approval of an Alternative Form of Ratemaking. Moreover, Pepco's repeated and substantial last-minute amendments to its proposal(s) have produced an incurably muddied record that cannot viably support Pepco's application. As such, DCG joins the other parties in requesting that, along with all further and additional relief deemed necessary, the PSC: (1) reject Pepco's July 31, 2020 additional supplemental testimony; (2) dismiss Pepco's Enhanced MRP Proposal; and (3) direct Pepco to withdraw its Rate Case Application.

If you have any questions about this filing, please contact the undersigned.

Respectfully submitted,

KARL A. RACINE Attorney General

By: <u>/s/ Brian Caldwell</u>

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cc: Formal Case No. 1156 Service List

## CERTIFICATE OF SERVICE

I certify that on August 12th, 2020, a copy of the District of Columbia Government's Letter in Support of Joint Request for Relief was served via electronic mail on the following parties:

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