

Kim F. Hassan  
Associate General Counsel

EP9628  
701 Ninth Street NW  
Washington, DC 20068-0001

Office 202 872 2967  
Fax 202.331 6767  
pepcoholdings.com  
kim.hassan@exeloncorp.com

March 22, 2019

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

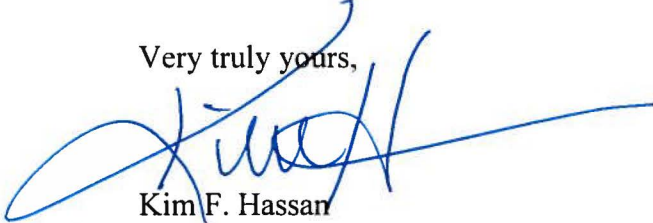
**Re: Formal Case No. 1153**

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Joint Motion to Stay the Procedural Schedule to Allow Additional Time for Settlement Discussions in the referenced proceeding.

Please feel free to contact me if you have any questions regarding this matter.

Very truly yours,



Kim F. Hassan

cc: All parties of Record

**BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF THE DISTRICT OF COLUMBIA**

**IN THE MATTER OF**

**The Potomac Electric Power Company's  
Petition for an Investigation Into  
the Status of Walter Reed's Electric  
Distribution System**

)  
)  
)  
)  
)  
)

**Formal Case No. 1153**

**JOINT MOTION TO STAY THE PROCEDURAL SCHEDULE TO ALLOW  
ADDITIONAL TIME FOR SETTLEMENT DISCUSSIONS**

Pursuant to Rule 105.8 of the Rules of Practice and Procedure of the Public Service Commission of the District of Columbia ("Commission"), the District of Columbia Government, Potomac Electric Power Company, WGL Energy Systems, Inc., WGL Energy Services, Inc., the Parks at Walter Reed Owners' Association, Inc., and TPWR Developer, LLC (hereinafter collectively referred to as the "Parties") respectfully request this motion to further stay the above-referenced proceeding to permit the Parties additional time to pursue settlement.<sup>1</sup> In addition, the Parties request an expedited ruling on this Motion and ask that the Commission shorten the response period from 10 days to five days. In support of the motion, the Parties state as follows:

1. On December 11, 2018, the Parties filed a joint motion requesting that the Commission hold Formal Case No. 1153 in abeyance and stay all proceedings for a period of 60 days in order to facilitate settlement discussions.

2. The Commission, in Order No. 19807, granted the joint motion, and held the procedural schedule in abeyance for 60 days, or until March 25, 2019.

---

<sup>1</sup> At the time of the filing of this motion, the Office of the People's Counsel had not taken a position on the Parties' request for additional time to continue settlement discussions.

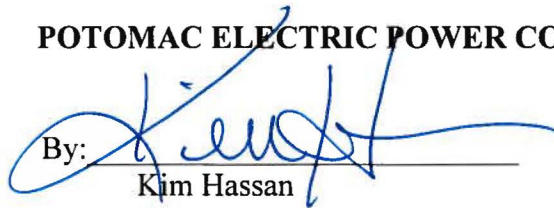
3. The Parties are currently engaged in settlement discussions, including the negotiation of a written settlement, and are in the process of negotiating the terms of that agreement. The Parties have made substantial progress but require additional time to continue discussions and finalize the terms of the agreement. In order to allow the Parties to continue their settlement efforts, the Parties respectfully move the Commission to further stay the proceedings for an additional 90 days, until June 24, 2019. A further stay of this proceeding will accommodate possible amicable resolution of this matter and preserve judicial and party resources.

4. The Parties commit to providing the Commission with an update on the status of the settlement no later than May 15, 2019.

WHEREFORE, the Parties respectfully request that the Commission grant this motion and stay this proceeding. The Parties further request that the Commission reduce the period for responding to this Motion and expedite issuing a ruling on this Motion.

Sincerely submitted on behalf of the Parties,

**POTOMAC ELECTRIC POWER COMPANY**

By:   
Kim Hassan  
Associate General Counsel

Wendy Stark, DC Bar No. 1011577  
Kim Hassan, DC Bar No. 489367  
Dennis Jamouneau, DC Bar No. 983375  
Andrea Harper, DC Bar. No. 483246  
701 Ninth Street, NW  
Suite 1100  
Washington, DC 20068  
(202) 872-2967  
*Counsel for Potomac Electric Power Company*

Karen M Hardwick, DC Bar No. 423232  
General Counsel  
Benjamin L. Israel, DC Bar No. 414423  
Associate General Counsel  
Washington Gas  
1000 Maine Ave., SW  
Washington, DC 20024  
*Counsel for WGL Energy Systems, Inc. and WGL Energy Services, Inc.*

Timothy J. Fitzgibbon, DC Bar No. 370619  
Steven Shparber, DC Bar No. 1016286  
Nelson Mullins Riley & Scarborough LLP  
101 Constitution Avenue, NW, 9th Floor  
Washington, DC 20001  
(202) 507-4634  
(202) 689-2994

Weston Adams, III  
Nelson Mullins Riley & Scarborough LLP  
1320 Main Street, 17th Floor  
Columbia, SC 29201  
(803) 255-9708  
*Counsel for the Parks at Walter Reed Owners' Association, Inc. and TPWR Developer, LLC*

Brian Caldwell, DC Bar No. 979680  
Assistant Attorney General  
Public Integrity Section  
Office of the Attorney General  
of the District of Columbia  
441 Fourth Street, N.W. Ste # 600-S  
Washington, D.C. 20001  
(202) 727-6211  
*Counsel for the District of Columbia Government*

Washington, D.C.  
March 22, 2019

## CERTIFICATE OF SERVICE

I hereby certify that a copy of the Joint Motion to Stay the Procedural Schedule to Allow Additional Time for Settlement Discussions has been electronically served this March 22, 2019 on:

Ms. Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1333 H Street, NW, 2<sup>nd</sup> Floor  
Washington, DC 20005  
[bwestbrook@psc.dc.gov](mailto:bwestbrook@psc.dc.gov)

WGL Systems  
Karen M. Hardwick Senior Vice President  
and General Counsel  
Leslie T. Thornton  
Donald R. Hayes  
Meera Ahamed  
Paul S. Buckley  
John C. Dodge  
Cathy Thurston-Seignious  
Adam Fine  
Benjamin Isreal  
Washington Gas  
1000 Maine Ave., S.W.  
401 9<sup>th</sup> Street, N. W., Suite 1000  
Washington, DC 20024  
[Leslie.thornton@washgas.com](mailto:Leslie.thornton@washgas.com)  
[dhayes@washgas.com](mailto:dhayes@washgas.com)  
[blisrael@washgas.com](mailto:blisrael@washgas.com)

Brian Caldwell, Esq.  
Assistant Attorney General  
Public Integrity Section  
DC Office of the Attorney General  
441 Fourth Street, NW  
Suite 60 S  
Washington, DC 20001  
[Brian.caldwell@dc.gov](mailto:Brian.caldwell@dc.gov)

Sandra Mattavous-Frye, Esq.  
People's Counsel  
Office of the People's Counsel  
1133 15<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20005  
[smfrye@opc-dc.gov](mailto:smfrye@opc-dc.gov)

Steven Shparber  
Nelson Mullins Riley & Scarborough, LLP  
101 Constitution Avenue, N.W., 9<sup>th</sup> Floor  
Washington, D.C. 20001  
[Steven.shparber@nelsonmullins.com](mailto:Steven.shparber@nelsonmullins.com)

  
Kim F. Hassan