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People's Counsel

December 10, 2019

VIA ELECTRONIC FILING

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

Re: Formal Case No. 1159, In the Matter of the Application of the Potomac Electric Power Company for Approval of the Second Biennial Underground Infrastructure Improvement Plan

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-captioned docket, please find the *Comments of the Office of the People's Counsel for the District of Columbia (PUBLIC)*.

If there are any questions regarding this matter, please contact me at 202.261.1438.

Sincerely yours,

/s/Travis R. Smith, Sr.
Travis R. Smith, Sr.
Trial Supervisor

Enclosure

cc: Parties of Record

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

In the Matter of	§	
	§	
The Applications for Approval of Biennial	§	Formal Case No. 1159
Underground Infrastructure Improvement	§	
Projects Plans and Financing Orders	§	
	§	

PUBLIC VERSION

**COMMENTS OF THE OFFICE OF THE PEOPLE’S COUNSEL FOR THE
DISTRICT OF COLUMBIA**

I. INTRODUCTION

Pursuant to section 309 of the Electric Company Infrastructure Improvement Financing Act of 2014,¹ as amended by the Electric Company Infrastructure Improvement Financing Emergency Amendment Act of 2017,² (hereinafter the “Undergrounding Act” or “Act”) and the October 11, 2019, Public Notice issued in this proceeding by the Public Service Commission of the District of Columbia (“PSC” or the “Commission”),³ the Office of the People’s Counsel for the District of Columbia (“OPC” or the “Office”), the statutory representative of utility ratepayers and consumers in the District,⁴ hereby submits the *Comments of the Office of the People’s Counsel for the District of Columbia* regarding the Potomac Electric Power Company

¹ D.C. Law 20-102; D.C. Code § 34-1311.01 *et seq.*

² D.C. Law 22-067.

³ *Formal Case No. 1159, In the Matter of the Application for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Orders* (“*Formal Case No. 1159*”), Public Notice rel. October 11, 2019.

⁴ D.C. Code § 34-804 (Lexis 2019).

(“Pepco”) and the District Department of Transportation’s (“DDOT”) Second Biennial Underground Infrastructure Improvement Projects Plan (“Second Biennial Plan”) and Financing Order Application (“Financing Application”) filed in this proceeding on September 30, 2019.

Pepco’s obligations under D.C. Code § 34-1101(a), *et seq.*, include the explicit obligation to furnish “service and facilities reasonably safe and adequate and in all respects just and reasonable.” The Office, as the principal voice for consumers most directly affected by the costly and often health-threatening service outages experienced over the years in the District, has been a consistent advocate for improving the reliability and strengthening the resiliency of the distribution system to withstand the severe weather events that have been increasingly affecting the District and mid-Atlantic region. The undeniable fact is that these severe weather events disproportionately impact the overhead distribution system in the District, which is vulnerable to high winds, heavy snows and ice, and falling trees and tree limbs. The Office was therefore an active participant in the Power Line Undergrounding Task Force (“Task Force”), which was convened in August 2012 by then-Mayor Vincent Gray after the devastating impacts of the derecho storm that struck D.C. that same summer,⁵ and in every administrative and legislative initiative addressing these critical issues since that time—including, the nearly year-long rewrite of the Electric Company Infrastructure Improvement Financing Act of 2014.

II. SUMMARY

The Office has concluded that both the Second Biennial Plan and Financing Application largely comply with the statutory requirements of the Undergrounding Act as do the calculations

⁵ *Formal Case No. 982, In the Matter of the Investigation of the Potomac Electric Power Company Regarding Interruption to Electric Energy Service*, District of Columbia Major Service Outage Report June 29-July 7, 2012 DERECHO, rel. July 30, 2012, at p. 3.

and cost allocations underlying Pepco's Underground Project Charge (or "UPC") and Underground Rider. To assist in its review of the Second Biennial Plan, the Office retained the services of Mr. Kevin J. Mara, an electrical engineer with over thirty-five years' of experience in the electric utility industry.⁶ Based on OPC's review, as informed by Mr. Mara's independent analysis, the Office has limited concerns with certain technical aspects of the Second Biennial Plan (*see* Section IV, below). Based on these concerns, in the comments below the Office sets forth the following recommendations:

- Pepco's selection criteria may result in District ratepayers paying unnecessary costs;
- The Company should be required to annually file with the Commission geographic representations of CELID (Customers Experiencing Long Interruption Durations) and CEMI+3 (Customers Experiencing Multiple Interruptions)⁷ in order to permit the Commission, the Office, and interested stakeholders to track the effectiveness of Pepco's area reliability plans;
- Ward 7 spending, which is currently proposed to be [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] during the Second Biennial Plan, should be increased to more closely match the average spend for each Ward [BEGIN CONFIDENTIAL] [END CONFIDENTIAL]; and
- The Commission should deny Pepco's request to include in rate base conduits and manholes that are not used or useful.

OPC believes it can work with Pepco to address its concerns without delaying the ongoing undergrounding activity in the District. If, as expected, the Office and Pepco can come to an

⁶ Mr. Mara's supporting affidavit is attached hereto as Exhibit OPC - (A) and is being submitted with these Comments.

⁷ "CEMI+3" represents those customers who have experienced three or more outages in a single year.

agreement on the technical issues identified herein, the OPC believes the Commission can act on the Second Biennial Plan without the need for an evidentiary hearing under section 309(d) of the Undergrounding Act.

III. BACKGROUND

On July 3, 2017, Pepco and DDOT filed the First Biennial Underground Infrastructure Improvement Projects Plan (“First Biennial Plan”) and a Financing Application pursuant to section 307(a) of the Undergrounding Act. The First Biennial Plan identified six electric distribution feeders, all or parts of which were at that time overhead, that Pepco and DDOT proposed to place underground. The First Biennial Plan also requested approval of the proposed Electric Company Infrastructure Improvement Costs (“Electric Costs”) and related Underground Project Charge (“UPC”), through which the Company is authorized to recover those costs, while the Financing Application sought Commission approval of the proposed DDOT Underground Electric Company Infrastructure Improvement Costs (“DDOT Costs”) and the related Underground Rider, through which Pepco is reimbursed by ratepayers⁸ the DDOT Costs assessed to it by the District.

After reviewing the record—including, comments and protests filed by intervenors—the Commission, in Order No. 19167, approved the First Biennial Plan and Financing Application and set reporting requirements to monitor and review the progress of the First Biennial Plan.⁹

On September 30, 2019, DDOT and Pepco filed a Second Joint Application seeking approval of their Second Biennial Plan and Financing Application. The Second Biennial Plan identifies ten

⁸ Per the prescriptions of the Undergrounding Act, Residential Aid Customers are assessed neither the UPC nor the Underground Rider.

⁹ *Formal Case No. 1145, In the Matter of the Applications for Approval of Biennial Underground Infrastructure Improvement Projects Plans and Financing Orders* (“*Formal Case No. 1145*”), Order No. 19167 rel. November 9, 2017 (“*Order No. 19167*”).

electric distribution feeders that are currently overhead, all or parts of which DDOT and Pepco propose to place underground. As with the First Biennial Plan, the Second Biennial Plan requests approval of a change in the UPC to recover the proposed Electric Costs incurred by Pepco to underground the selected feeders whereas the Financing Application seeks approval of the proposed DDOT Costs and related Underground Rider, which, again, is the mechanism through which Pepco is authorized to recover the DDOT Costs assessed to it by the District.

IV. COMMENTS

A. Compliance with Statutory Obligations

Section 308 of the Undergrounding Act specifies the contents required to be included in any application seeking authorization for approval of a Biennial Plan and the issuance of a Financing Order. The Office has reviewed the Second Biennial Plan and has determined it includes all the information required under the applicable statutory provisions for the Commission, the Office, and interested stakeholders to assess the merits of the Second Biennial Plan and the Financing Application.

B. System Design and Feeder Selection

Section 310(b)(2) of the Act requires the Commission to find, in any order approving a Biennial Plan, that the proposed underground infrastructure improvements are appropriately designed and located. Section 310(b)(3) requires further that the Commission must find that the intended reliability benefits will accrue to Pepco's customers. The Office has identified the following concerns with certain technical aspects of the Second Biennial Plan. Notwithstanding the existence of these issues, as noted above, the Office believes it can reach an agreement with Pepco on modifications to the Second Biennial Plan that will alleviate these concerns and obviate the need for an evidentiary hearing in this proceeding on the Second Biennial Plan.

1. Resiliency versus reliability

a) Pepco's selection criteria may result in District ratepayers paying unnecessary costs.

The Office previously expressed reservations in comments on the First Biennial Plan about Pepco's practice of delaying undergrounding some feeders that meet the established criteria for undergrounding in order to test the effectiveness of area reliability projects like that for Benning Road.¹⁰ The Office reiterates the concern that this Pepco practice could result in District ratepayers paying twice—once for the reliability project and again if Pepco decides it still needs to place the feeder(s) underground in order to improve grid resilience. Pepco's practice also shifts D.C. PLUG's focus from being about improving grid resiliency to improving grid reliability, which could prove devastating for the Pepco ratepayers served by feeders whose placement underground is being delayed because those lines have been included in other area reliability projects whose overall effectiveness in improving reliability has yet to be determined. Even if those projects result in reliability improvements for the feeders in question, any such enhancements would be incremental, at best, and would not storm-harden Pepco's distribution system against major weather events nearly as much as undergrounding would. The reason for

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3. Ratepayers should not pay twice for reliable and resilient service

The difficult choices inherent in the decision to underground Feeder 368 as opposed to Feeders 15707 or 15705 highlight considerations that must be in the forefront of any decision to choose steps short of undergrounding to improve reliability on a feeder that is a good candidate for undergrounding. Undergrounding is expensive and should almost never be the first solution to reliability problems, but balanced against the cost of undergrounding is the fact that if the reliability solutions do not work, or they improve reliability but not resiliency, a feeder may still be selected for undergrounding in a future Biennial Plan. Pepco must fully and carefully evaluate the costs and benefits of the solutions it evaluates and identify clear, targeted benefit(s) that ratepayers can expect from such solutions. The Commission, in turn, must carefully scrutinize any future effort to underground feeders that previously have been the subject of other forms of remediation to ensure that ratepayers do not unnecessarily pay twice for reliability and resilience.

Formal Case No. 1145, Comments of the Office of the People's Counsel for the District of Columbia Regarding the Joint Application of the Potomac Electric Power Company and the District Department of Transportation for Approval of the Biennial Underground Infrastructure Improvement Projects Plan and Financing Order Application, filed September 13, 2017 at p. 12.

this is quite simple—feeders associated with area reliability projects will remain above ground and therefore vulnerable to heavy snow, ice, high winds, torrential rains, and falling trees whereas those placed underground will not. While the D.C. area has been spared (thankfully) the types of major storm events that served as the impetus for D.C. PLUG (e.g., the 2012 derecho, “Snowmagedon”, and Super Storm Sandy), in light of the extreme weather patterns being ushered in worldwide by the Global Warming phenomenon, it is not a question of “if”, but, rather, “when”, the District will be beset by similar (if not worse) calamitous weather events. The impetus for the Undergrounding Act, was, and remains, the need to enhance reliability and resiliency of the electric distribution system and to minimize the impact of more frequent severe weather events:¹¹ The recommendation of the Mayor’s Task Force involved balancing the advantages and disadvantages of undergrounding with other reliability enhancement options.¹² The recommendations of the Mayor’s Task Force resulted in a set of criteria for selection of underground feeders.

- b) The Company should be required to annually file geographic representations of CELID and CEMI+3 in order to permit the Commission, the Office, and interested stakeholders to track the effectiveness of Pepco’s area reliability plans and to identify neighborhoods in need of reliability and resiliency improvements.**

Pepco’s practice is to take overhead feeders that meet the statutory criteria for undergrounding to improve resiliency and reliability and include those feeders in neighborhood or area reliability projects that exclude the use of undergrounding,¹³ based not on statutory criteria but on Pepco-defined criteria. These reliability projects focus on pole replacements,

¹¹ D.C. Code §34-1311.02(1) (Lexis 2019).

¹² *Power Line Undergrounding Task Force Findings and Recommendations: Final Report*, at p. 11 (Oct.2013) (“Final Report”).

¹³ Examples include 12th & Irving Area Plan, Benning Area Plan, and Ft. Lincoln Reliability Initiative.

conductor upgrades, more Automatic Circuit Reclosers (“ACR”), and Automatic Sectionalizing and Reclosing (“ASR”) schemes to improve reliability. If the Commission is willing to permit this practice of omitting feeders that meet the statutory criteria for undergrounding to continue, it should, at a minimum, arm itself, the Office, and the public with the kind of information that will assist in evaluating the reasonableness of: (i) Pepco’s decisions to use an area reliability plan as opposed to undergrounding; (ii) the Company’s selection of location “A” as opposed to location “B” for an area reliability plan; and (iii) the effectiveness of Pepco’s area reliability projects.

The improvements for the Benning Road area began in 2013 when three power lines in that area were identified as Priority Feeders.¹⁴ Following the work in 2013, in 2017 Pepco embarked on the Benning Area Reliability Plan (“BARP”).¹⁵ On June 20, 2019, Pepco reported that construction of Feeders 15707, 15705, and 15710 had been completed, while the work on Feeders 15706, 15709, and 14717 is on-going.¹⁶ OPC notes that funds are budgeted through 2020 for the BARP. Pepco’s spending on reliability in the BARP, and the Priority Feeder work in 2013, is \$16.7 million.¹⁷

The effectiveness of these reliability-improvement plans has yet to be determined, although Pepco generally requires one year of reliability data post-construction to evaluate the impact of any reliability work.¹⁸ The Office supports efforts by the Commission and Pepco to identify and improve reliability to neighborhoods that are additive to the feeder reliability

¹⁴ *PEPACR 2015-01*, 2015 Annual Consolidated Report, at p. 233.

¹⁵ *Formal Case No. 1145*, Direct Testimony of Bryan L. Clark, Exhibit Pepco (B) at 8:14-9:8.

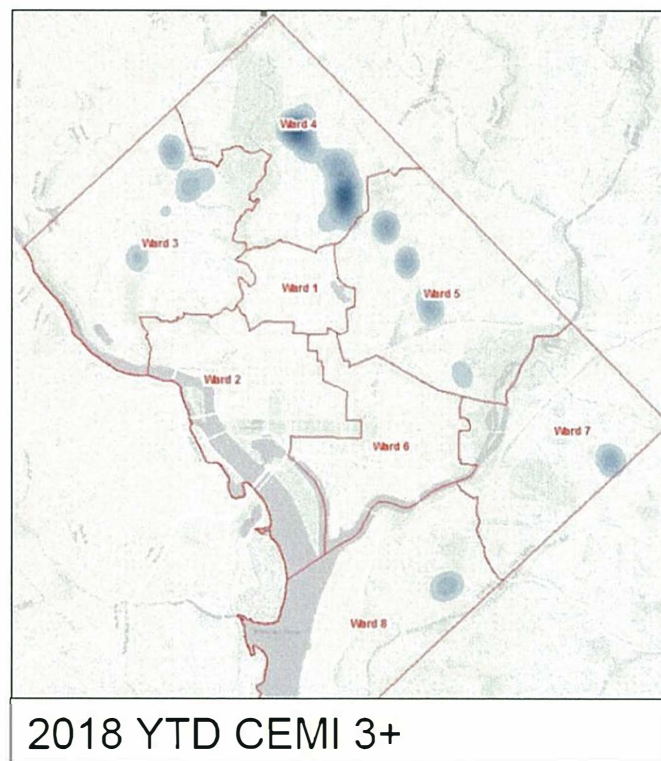
¹⁶ *Formal Case No. 1145*, Pepco’s Thirty-Day Report on the Semi-Annual Meeting held on June 20, 2019, rel. July 22, 2019 at p. 6.

¹⁷ *Formal Case 1156*, Direct Testimony of Bryan L. Clark, Exhibit Pepco (I)-2 UDLRM402 and UDLPRM4WA2 and 2013 Annual Consolidated Report pp. 253, 258 and 262.

¹⁸ *Formal Case No. 1159*, Pepco’s Response to OPC Data Request 1, Question No. 24.

programs; however, there needs to be an effective way to track the effectiveness and prudence of these improvements on local neighborhood reliability.

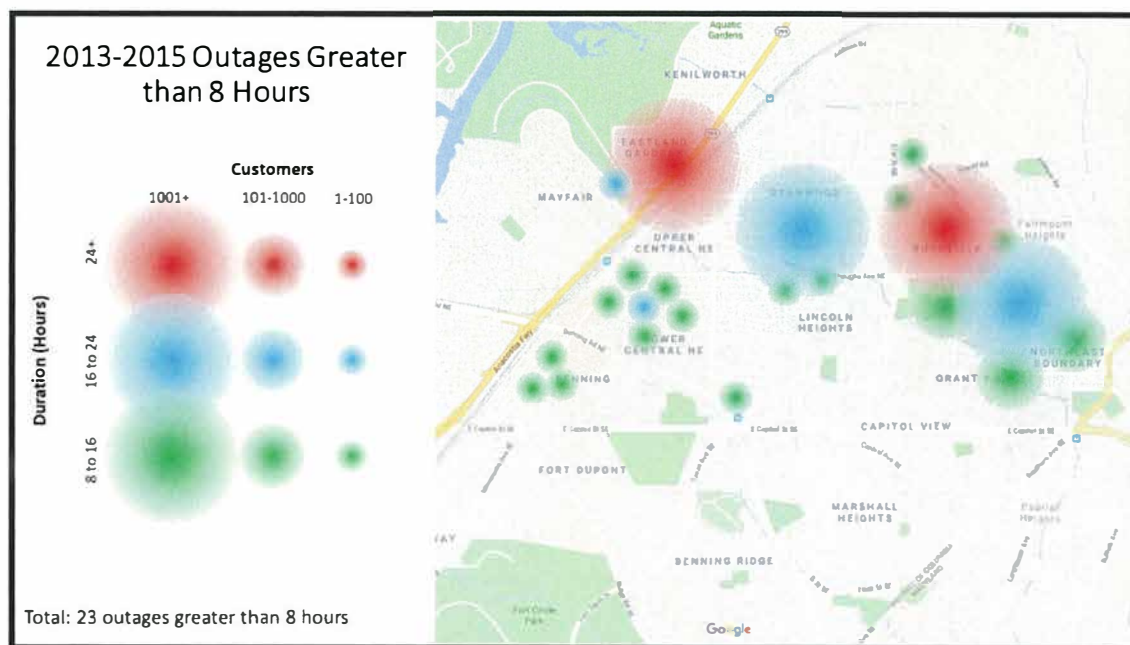
Currently, Pepco is using a defined geospatial approach to determine neighborhoods which have more than 250 customers experiencing three or more outages in a single year.¹⁹ This metric is referred to as “Customers Experiencing Multiple Interruptions” or “CEMI”. CEMI+3 represents those customers who have experienced three or more outages in a single year. Pepco presented this geospatial approach at the July 2019 PIWG Meeting showing the CEMI+3 based on 2018 data, which is shown below in the diagram titled “2018 YTD CEMI 3+”.



Another reliability metric used by electric utilities is referred to as “Customers Experiencing Long Interruption Duration” or “CELID”. These geographical representations allow for the identification of service reliability and resiliency by neighborhoods and an

¹⁹ *PEPACR 2019-01*, 2019 Annual Consolidated Report, at p. 180.

assessment of the effectiveness of reliability plans and undergrounding initiatives. Using data available to the Office, Mr. Mara was able to prepare the following geographical representation of CELID+8²⁰ for a group of feeders²¹ in the Benning Area as an example of the how the data can identify localized reliability problems.



Currently, the Commission requires Pepco to file information regarding CELID+8.²² The Office recommends that the Company annually file geographic representations of CELID and CEMI+3 in order to permit the Commission, the Office, and interested stakeholders to track the effectiveness of Pepco's area reliability plans (to re-evaluate the Company's decisions to delay undergrounding certain lines that were instead included in these plans) and to identify neighborhoods in need of reliability and resiliency improvements.

²⁰ The "+8" means an interruption duration of more than 8 hours.

²¹ Mr. Mara utilized data for Feeders 14717, 15705, 15706, 15707, 15709, and 15710.

²² 15 DCMR §§ 3601.6 and 3601.7 (Lexis 2019).

(2) Plans for Ward 7

The BARP is located in Ward 7, and Pepco's recommendation is to remove Feeders 15707 and 15705 from the DC PLUG feeder candidates.²³ The next least reliable feeder in Ward 7 is Feeder 118. In the Second Biennial Plan, Pepco proposes to underground only the taps of Feeder 118. The mainline of Feeder 118, which runs along Pennsylvania Avenue SE (roughly between Alabama Ave. and Minnesota Ave.), will remain overhead. This section of Pennsylvania Ave SE was recently re-paved with new curbs and sidewalks; as a result, Pepco is recommending not to underground the main line along Pennsylvania Ave. This is a relatively low-cost undergrounding project because of the limited number of affected customers.

The total budget for undergrounding in the Second Biennial Plan is **[BEGIN CONFIDENTIAL]**
[END CONFIDENTIAL]. To improve system reliability and resiliency, and to improve the spending balance among Wards, OPC recommends that portions of Feeder 15705 be undergrounded, even though this feeder is included in the BARP. Specifically, undergrounding is recommended for Lane PL NE, Ord St, NE, and 45th Place NE, which are shown in light red on the map below. **[BEGIN CONFIDENTIAL]**

²³ *Formal Case No. 1159*, Pepco Application for Approval of the Second Biennial Underground Infrastructure Project Plan, Second Biennial Underground Infrastructure Projects Plan, filed September 30, 2019 at p. 11.

[END CONFIDENTIAL]

As evidenced below, the extreme tree canopies on these streets mean that, regardless of the overall performance of the BARP, undergrounding will be required to achieve the same level of resiliency and reliability experienced by other customers on this feeder and within Pepco's service area.



Figure 1: Tree Canopy along Lane Place

The conversion from overhead to underground of these taps on Feeder 15705 would be of similar design as the taps proposed for undergrounding on Feeder 118. The Office's estimate to underground these particular streets on Feeder 15705 is roughly \$2.5 million. OPC submits Ward 7 spending should be increased to more closely match the [BEGIN CONFIDENTIAL] [END CONFIDENTIAL] average spend for each Ward.

(3) Rate base treatment of conduits

Pepco requested that \$213,000 be added to the rate base for conduits that were installed on Feeder 15707 near Minnesota Ave. NE and Grant Street. Prior to final approval of the DC PLUG plans, DDOT planned to re-pave a street in an area served by Feeder 15707. Pepco took advantage of the opportunity to install electrical conduits in conjunction with the DDOT project. According to Pepco, the conduits are unused.²⁴ The First Triennial Plan called for undergrounding Feeder 15707 **[BEGIN CONFIDENTIAL]** **[END CONFIDENTIAL]**. At the time of the First Biennial Plan, Pepco decided, over OPC's objection, that Feeder 15707 should not be undergrounded in favor of the BARP plan. The Commission approved Pepco's plan regarding the BARP, but there was no mention in Order No. 19167 of the stranded conduits.

Pepco could have used the conduits as part of the current Second Biennial Plan to underground approximately 600 feet of Feeder 15707, or it could have proposed to underground a larger portion of this feeder. The decision to use or not use these conduits is a decision made solely by Pepco. The Office therefore recommends that the Commission deny Pepco's request to include in rate base these conduits and manholes that are not used or useful.

C. Communication and outreach

Meaningful and effective communication and outreach are critical components of the D.C. PLUG initiative and remain vital to the program's overall success. Residents in affected Wards need to receive timely, accurate, and helpful information from Pepco/DDOT regarding

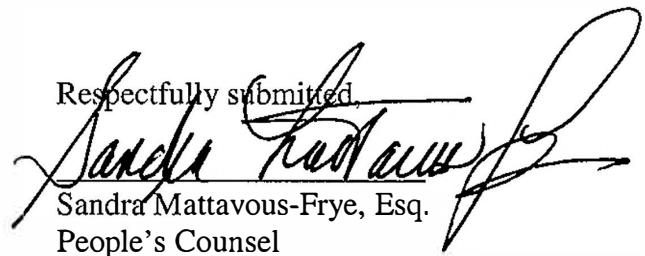
²⁴ *Formal Case No. 1159*, Pepco Application for Approval of the Second Biennial Underground Infrastructure Project Plan, Exhibit Pepco (C), Direct Testimony of Aaron Smith at 21:4-7.

construction activity in their respective neighborhoods. They also need to know how to file complaints, get answers to their questions, and suggest improvements to Pepco/DDOT's communication and outreach efforts. Pepco/DDOT's proposed communication and outreach plan, which is Appendix N of the Second Biennial Plan, is substantially the same education plan approved by the Commission in Order No. 19167. As such, the Office believes that, if properly implemented, it, along with the Undergrounding Project Consumer Education Task Force, should suffice in fulfilling the informational needs of residents in affected Wards.

V. CONCLUSION

Wherefore, for the foregoing reasons, the Office respectfully requests that the Commission consider these comments in its evaluation of the Second Biennial Plan.

Respectfully submitted,



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Dated: December 10, 2019

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

In the Matter of)

Applications for Approval of)

Biennial Underground)

Infrastructure Improvement)

Projects Plans and Financing Orders)

Formal Case No. 1159

**AFFIDAVIT
OF
KEVIN J. MARA**

**ON BEHALF OF
THE OFFICE OF THE PEOPLE’S COUNSEL
FOR THE DISTRICT OF COLUMBIA**

DECEMBER 10, 2019

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

In the Matter of

The Applications for Approval of Biennial
Underground Infrastructure Improvement
Projects Plans and Financing Orders

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Formal Case No. 1159

AFFIDAVIT OF KEVIN J. MARA

PERSONALLY APPEARED before me, Mr. Kevin J. Mara, who, being first duly sworn did depose and say as follows:

I. INTRODUCTION

1. My name is Kevin J. Mara. I am Vice President and a Principal Engineer at GDS Associates ("GDS"), 1850 Parkway Place, Suite 800, Marietta, Georgia, 30067.
2. I have over thirty-five years' experience as an electrical engineer in the electric utility industry. I have field experience in the operation, maintenance, and design of transmission and distribution systems. I have performed numerous planning studies for electric cooperatives and municipal systems; prepared short-circuit models and overcurrent protection schemes for numerous electric utilities; and provided services regarding general consulting, underground distribution design, territorial assistance, and training. I have also analyzed and evaluated electric systems on U.S. military bases.
3. I earned a B.S., Electrical Engineering, from Georgia Institute of Technology in 1982. I am a registered professional engineer in the Commonwealth of Virginia and twenty other states.
4. I submit this affidavit on behalf of the Office of People's Counsel for the District of Columbia ("OPC" or "Office"). This affidavit was prepared by me or under my direct supervision and control. I am familiar with all matters addressed herein.
5. The Office retained me to review and evaluate all aspects of the joint Second Biennial Underground Infrastructure Improvement Projects Plan ("Second Biennial Plan") and Financing Order Application filed in this proceeding on September 30, 2019.
6. In performing my analysis, I have reviewed the Second Biennial Plan and Pepco/DDOT's data request responses in this proceeding. I also performed an independent engineering analysis of the Pepco undergrounding plan. My analysis of

the Second Biennial Plan included both an investigation of the proposed routing and the feeders selected for undergrounding via Google Earth as well as an in-person inspection of certain portions of the proposed routing.

7. I have also performed an analysis of Pepco's feeder selection process and neighborhood reliability plans. I have utilized data available to the Office to develop a set of metrics designed to enable the Commission, the Office, and interested stakeholders to monitor the effectiveness of Pepco area reliability plans.
8. The Comments submitted by the Office in this proceeding reflect and incorporate my findings and concerns about the Second Biennial Plan, and I adopt those conclusions in this affidavit.

Further, the Affiant sayeth not.

[Next page is signature page]

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

In the Matter of

The Applications for Approval of Biennial
Underground Infrastructure Improvement
Projects Plans and Financing Orders

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Formal Case No. 1159

VERIFICATION

STATE OF GEORGIA)
COBB COUNTY)


I, the undersigned, being duly sworn, depose and say that the foregoing is the Affidavit of the undersigned, and that such Affidavit and the exhibits sponsored by me to the best of my knowledge, information, and belief are true, correct, accurate, and complete, and I hereby adopt said Affidavit as if given by me in formal hearing, under oath.



Kevin J. Mara

Subscribed and sworn to before me

This 4th day of December, 2019.



Faye Culpepper
Notary Public



My Commission expires: March 3, 2022

CERTIFICATE OF SERVICE

Formal Case No. 1159, In the Matter of the Application of the Potomac Electric Power Company for Approval of the Second Biennial Underground Infrastructure Improvement Plan

I certify that on this 10th day of December, 2019, a copy of the *Comments of the Office of the People's Counsel for the District of Columbia (PUBLIC)* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

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