

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

<b>In the Matter of The</b>	)	
<b>Petition of the Office of the</b>	)	
<b>People’s Counsel For An Investigation</b>	)	<b>Formal Case No. _____</b>
<b>Into the Electric Service Outage</b>	)	<b>(Expedited)</b>
<b>Beginning on June 22, 2012</b>	)	

**EXPEDITED PETITION OF THE OFFICE OF THE PEOPLE’S COUNSEL FOR AN  
INVESTIGATION INTO THE ELECTRIC SERVICE  
OUTAGE BEGINNING ON JUNE 22, 2012**

Pursuant to Rule 101.1 of the Rules of Practice and Procedure of the Public Service Commission of the District of Columbia (“PSC” or “Commission”), 15 D.C.M.R. §101.1 (2010), the Office of the People’s Counsel (“OPC” or “Office”), the statutory representative of the ratepayers of the District of Columbia in utility proceedings,<sup>1</sup> respectfully petitions the Commission to open a formal investigation with regard to the unplanned outage of electricity service which began on June 22, 2012, within the Potomac Electric Power Company’s (“Pepco” or “Company”) District of Columbia service territory, specifically the Wards 3, 4 and 5.

Pepco reported the Company experienced approximately 18,000 outages in the District of Columbia during the June 22, 2012 rain storm.<sup>2</sup> As of shortly before noon, June 23, 2012, it is OPC’s understanding that approximately 9,000 outages remained. OPC staff spoke with a Pepco customer representative at approximately 6:00 am on June 23, 2012. The Pepco customer representative (located out of state) informed OPC staff a downed tree had affected the area, but

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<sup>1</sup> D.C. Official Code § 34-804 (2010).

<sup>2</sup> See Pepco press release entitled “Pepco Crews Working Round the Clock to Restore Power” available at: <http://www.pepco.com/welcome/news/releases/archives/2012/article.aspx?cid=2038>(June 23, 2012).

could not provide a restoration time. According to Pepco's Press Release, approximately 3,800 District customers remained without power as of 5:30 pm, June 23, 2012.

It is ironic that in the midst of the Commission's investigation in Formal Case No. 1087, when the Company is trying to defend its reliability record while requesting millions of dollars another large outage occurs during a forecasted weather event. The continued threats to public security and health, and the potential harm to the District economy posed by this outage cannot be overstated. While the Commission has several open reliability dockets, the Office requests the Commission immediately institute a formal investigation into 1) the causes of this most recent outage, and, equally importantly, and 2) Pepco's response to the outage. As stated before and likely to be stated again, the District of Columbia is entitled to safe, adequate and reliable electric service and it is not receiving it. An investigation into these issues is necessary, not to allocate blame, but to provide a public record that will facilitate sound public policy and decision making.

It is no secret that the Office and Commission have different views on how best to investigate the chronic outages on Pepco's District distribution system. However, in light of all of the District's reliability problems and the Company's pending rate request, the Office is proposing the Commission investigate Pepco's performance leading up to, during and in response to this latest outage.

**WHEREFORE**, the Office petitions the Commission, as the agency statutorily charged with ensuring that safe, adequate and reliable service is provided to the District, to immediately investigate the cause of the June 22, 2012 outage and the adequacy of Pepco's response to the outage.

Respectfully submitted,

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