



**Office of the People's Counsel
District of Columbia**

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June 17, 2008

Elizabeth A. Noël
People's Counsel

VIA ELECTRONIC FILING

Dorothy Wideman
Commission Secretary
Public Service Commission
of the District of Columbia
1333 H Street, N.W.
Second Floor West
Washington, D.C. 20005

Re: **Formal Case No. _____, In the Matter of the Petition of the Office of the People's Counsel for an Investigation into the 2008 Electric Service Outages in PEPCO's D.C. Service Area**

Dear Ms. Wideman:

Enclosed for filing in the above-referenced proceeding are an original and three (3) copies of the "the Petition of the Office of the People's Counsel for an Investigation into the 2008 Electric Service Outages in PEPCO's Service Area."

If there are any questions regarding this matter, please contact me at (202) 727-3071.

Sincerely,

Margaret Sallah
Assistant People's Counsel
D.C. Bar No. Pending

Enclosure

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

In the Matter of The)
Petition of the Office of the)
People’s Counsel For An Investigation) Formal Case No. ____
Into the 2008 Electric Service Outages)
in the District of Columbia Service Area)

**PETITION OF THE OFFICE OF THE PEOPLE’S COUNSEL
FOR AN INVESTIGATION INTO
THE 2008 ELECTRIC SERVICE OUTAGES IN PEPCO’S D.C. SERVICE AREA**

Pursuant to Rule 101.1 of the Rules of Practice and Procedure of the District of Columbia Public Service Commission (“PSC” or “Commission”), 15 D.C.M.R. §101.1 (2004), the Office of the People’s Counsel (“OPC” or “Office”), the statutory representative of the ratepayers of the District of Columbia in utility proceedings,¹ respectfully petitions the Commission to open a formal investigation with regard to the 2008 unplanned outages of electricity service that have occurred within the Potomac Electric Power Company’s (“PEPCO”) District of Columbia service territory.²

The Office submits the recent spate of unexplained electric outages affects the welfare and public safety of D.C. consumers and citizens. Accordingly, OPC requests the PSC exercise the full breathe of its plenary authority to ensure the provision of electric service is both “safe” and “reliable.” To this end, the Commission should investigate and determine that PEPCO is taking its statutory responsibilities seriously and doing all it can to correct any system related problem.³

¹ D.C. Official Code § 34-804 (2001).

² 15 DCMR 101.2 (2004). D.C. Code §1-204.93 (2001).

³ D.C. Official Code §§, 34-301(2), 34-808 and 34-1506(b)(2001).

I. Introduction

On Friday, June 13, 2008,⁴ thousands of District of Columbia residents, businesses and the federal government, including the White House, were affected by an unplanned outage. This outage, perhaps the most egregious of the series of outages which have occurred throughout the District for the past year, is troubling. Similar outages have occurred in various Wards and under varied circumstances, culminating with the outage of June 13th. As we move into the Summer months, the stress on the District of Columbia's electric grid will continue to grow. In order to protect the public well-being and safety, OPC urges the Commission to act proactively to address the situation.

II. Discussion

OPC has gathered, analyzed and tabulated the notifications it receives from PEPCO regarding outages. This list includes non-major incidents as specified by the Commission's Electrical Quality of Service Standards Reporting Requirements.⁵ From January through mid-June of 2008 the total number of incidents was 151.⁶ In January of 2008, 8 out of the 31 days were affected by outages. There were 9 separate incidents. The total number of maximum customers affected for the month was 4,564. In February of 2008, 8 out of the 31 days were affected by outages. There were 9 separate incidents. The total number of maximum customers affected for the month was 4,564. For the month of February 2008, outages occurred on 14 out of the 29 days. There were 32 separate incidents and the total number of maximum customers affected for the month was 18,088. Some wards were affected by more than one incident at a time. In March of 2008, outages occurred on 12 out of the 31 days. There were 29 separate incidents and the total number of maximum customers affected for the month was 12,844. In

⁴ See Attachment A for copies of PEPCO notifications and news articles documenting the recent outages.

⁵ DCMR Title 15, §3601 (2008).

⁶ This number does not include manhole incidents.

this month Ward 2 was the only ward not affected by an outage. Again, some wards were affected by more than one incident at a time.

Fifteen out of the 30 days in April were affected by outages. There were 18 separate incidents. For April the total number of maximum customers affected was 9,856. Once more, some wards were affected by more than one incident at a time. In May of 2008, there were 50 separate incidents. Outages occurred on 15 out of 31 days. The total number of maximum customers affected for the month was 39,950. The trend continued with some wards affected by more than one incident at a time. The month of June only includes reports through the seventh of the month. There were 13 separate incidents. They occurred 4 days out of the seven and again, some wards were affected by more than one incident at a time. See Chart below:

Ward	Incidents affected per ward						MAX CUSTOMERS AFFECTED per ward					
	Jan	Feb	Mar	April	May	June	Jan	Feb	Mar	April	May	June
One	2	5	2	4	6	3	1615	2243	4796	2446	5577	969
Two	2	1	0	3	3	0	281	3168	0	2191	407	0
Three	2	6	7	4	12	3	667	2453	4857	2944	4909	3108
Four	1	3	3	2	6	1	277	180	480	1455	4765	1347
Five	0	5	5	1	3	3	0	3351	3919	109	1758	2217
Six	0	3	3	1	2	1	0	3950	841	380	1670	525
Seven	1	6	8	3	8	2	694	3321	2187	2028	7461	7
Eight	1	2	2	1	10	0	630	160	238	1	14970	0

⁷ Some numbers may include residents of more than one Ward because the incident affected more than one Ward. For example, on February 26, 2008 a single incident affected both Wards 2 and 6. See PEPCO's "Report of Non-Major Customer Outage February 26, 2008."

Manhole incidents also appear in PEPCO's reports. 31 incidents have been reported from January of 2008 through June 7th, 2008. See Chart below:

Month	Number of Incidents
January	3
February	5
March	3
April	7
May	10
June	3

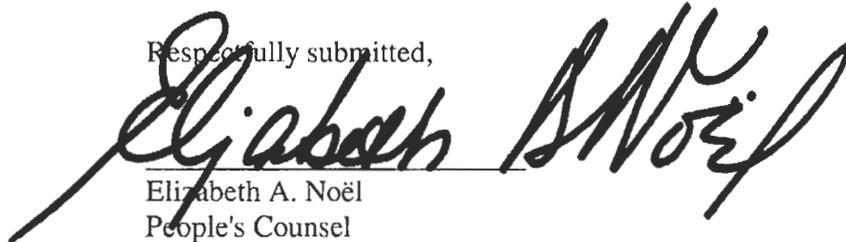
OPC submits these unexplained outages are both troubling and unacceptable. PEPCO as "a distribution only" company has the highest obligation to ensure that it provides reliable and safe service to its D.C. customers. Therefore, the Office of People's Counsel for the District of Columbia respectfully requests the District of Columbia's Public Service Commission to:

1. initiate and conduct a formal investigation into the 2008 unplanned outages of electricity service in the District of Columbia and PEPCO's efforts to resolve this service;
2. use the full breadth of its statutory plenary authority and responsibility to ensure that PEPCO undertakes and completes the necessary corrective actions; and
3. provide any other relief the Commission deems appropriate.

III. Conclusion

WHEREFORE, based on the aforementioned, OPC requests the Commission open a formal investigation into what appears to be an on-going service problem.

Respectfully submitted,

A large, stylized handwritten signature in black ink, appearing to read "Elizabeth Noël". The signature is written over a horizontal line.

Elizabeth A. Noël
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