

July 29, 2014

Mr. David J. Collins  
Executive Secretary  
Public Service Commission  
6 Paul Street  
Baltimore, Maryland 21202-6806

RE: MPSC # 413180707-L, 148922

Dear Mr. Collins:

I write on behalf of the Carderock Springs Citizens' Association (the Association) to again request that the Maryland Public Service Commission (the Commission) determine whether a series of fires and other damaging electrical surges experienced in our neighborhood are related to aging or the design of the electrical distribution system, the recent installation of smart-meters, or other electrical service or maintenance problems. While Pepco has completed some upgrades in our community, its refusal to i) complete all work it committed to undertaking, ii) provide the Association with information needed to assess the adequacy of its efforts going forward and iii) provide the Association with any materials to support its assertion that there is no evidence indicating that its distribution facilities caused or contributed to the fires and power surges experienced by our community has led the Association to reiterate its request of the PSC. The Association also notes that thus far the PSC's role in this proceeding (which commenced in April 2013) appears to be limited to sending the Association's correspondence to Pepco for review and response, and sending Pepco's correspondence to the Association for review and response. I urge the Commission to play a more active role in order to resolve this matter and in fulfillment of its mission to "ensure safe, reliable, and economic public utility and transportation service to the citizens of Maryland."

In our April 5, May 1, June 6 and August 1 2013 letters (see Attachment 3 for a record of all correspondence) the Association provided the Commission with documentation related to the recent surge in the numbers of electrical fires that were preceded by flickering lights or power surges, and single-home brownouts or power surges that have destroyed furnaces and other appliances in our community. I describe below what has transpired since that time.

On November, 6, 2013, the CSCA Board and some residents who have experienced fires or other electrical damage met with a Pepco delegation of corporate and engineering professionals to discuss these electrical events. In its presentation, Pepco

included a large poster of the electrical grid map of Carderock Springs, which depicted the three feeders that service the neighborhood's more than 400 residences. Both this map and other materials Pepco provided in response to the Association's requests to the PSC show that while 3 feeders serve our neighborhood, a single feeder, #15111, distributes power to every house damaged by electrical incidents as well as the four houses destroyed by fires. The Association believes that if the electrical incidents were coincidental, they should have been distributed on all three feeders that serve the community. Their concentration along just one of the three feeders supports the argument that the incidents are not coincidental.

On November 15 2013, Pepco Vice-President Jerry Pasternak informed the Association that Pepco would be undertaking inspections, monitoring and other efforts to identify the cause of these incidents, and that they would update the Board when those efforts were completed (estimated by end of 2013) to discuss the results and next steps.

On February 3, 2014, Mr. Pasternak informed the Association that it had completed monitoring work, and that it would be installing/replacing animal guards, lighting arrestors and cross-arm braces at some locations on the overhead portion of the feeder outside the neighborhood boundaries. More significantly, as a result of its inspection and review of the cables, transformers and outage dates experienced in the community, it concluded that "an overall upgrade of the system would benefit the area" and said it planned to replace cables and transformers on feeder #15111. According to Pepco, "the crews have begun pre-construction work for this upgrade, such as marking utilities and reviewing the work area. The sub-zero conditions are not good for digging and trenching, which makes this work very weather dependant. PEPCO expects to complete the work between the first and second quarter of this year or earlier if weather cooperates." See Attachment 1 for this correspondence.

On March 4 2014, Pepco included work on Carderock's troubled feeder in its Reliability Plan report on Case No. 9240 that it sent to the PSC. Please see the list of 'Underground Residential distribution Cable Replacement and see Attachment L, Page 1, where feeder 15111 is listed. However, unbeknownst to the Association, Pepco later listed this work as 'cancelled' in its May 2014 report to the PSC.

In May, after no observations of Pepco and contractor presence had been reported to the Association in some time, the Association requested an update from Mr. Pasternak. On May 14, Mr. Pasternak informed the Association that the engineers were still in the planning stage, despite its February assurance that the work would be completed by 1Q-2Q 2014. It took until June 18 (and after multiple efforts by the Association and elected officials engaging on the Association's behalf) for Mr. Pasternak to inform the Association that it had replaced 1900 feet of underground cable in April, and planned to replace ten transformers on feeder 15111. He subsequently provided the Association with a list of addresses at which each transformer scheduled for replacement was located. See Attachment 2 for that correspondence.

By early July, the Association confirmed through visual inspections and neighborhood reports that Pepco had replaced 9 of the 10 transformers Pepco committed



to replace. The 10<sup>th</sup>, disturbingly, is at 8011 Glenmore Spring Road, the location closest to most of the fires and other electrical damages in the community. In recent correspondence, Mr. Pasternak has a) asserted absent evidence that the 8011 Glenmore Spring Road transformer was replaced in the past 1-2 years, although the resident of 8015 Glenmore Spring Road whose home burned down almost exactly 2 years ago would surely have been aware of such work had it occurred, and b) asserted that he will not provide the community with the list of residential addresses served by the transformers that were replaced due to Pepco's security policy.

The Association will consider Pepco's remedy for feeder 15111 to be insufficient if it does not either replace the transformer located at 8011 Glenmore Spring Road or provide the Association with documentary evidence that the transformer has been replaced within the past two years. Further, the Association cannot assess the sufficiency of Pepco's remedy for feeder 15111 without a list of residential addresses served by the replaced transformers (which would allow the Association to compare the addresses of any future electrical surges or fires against the list of residential addresses that should have been protected from such incidents if Pepco's transformer replacement remedy was sufficient). Finally, the Association notes that despite repeated requests of both Pepco and the Commission, it has yet to receive any evidence whatsoever in support of Pepco's assertion that its distribution facilities did not cause the fires and other electrical surge damages in our community. The Association urges the Commission to take active steps to address the Association's concerns, and cannot assess the sufficiency of Pepco's remedy until these steps are taken.

Thank you very much for your consideration. For more information, please contact Dr. Michal Freedhoff at [michalilana@earthlink.net](mailto:michalilana@earthlink.net) or 301-767-9721.

Sincerely,



Michal Freedhoff, Ph.D.  
Chair, Public Works Committee  
Carderock Springs Citizens' Assoc.

**Attachment 1**

**From:** [jpasternak@pepco.com](mailto:jpasternak@pepco.com) [<mailto:jpasternak@pepco.com>]  
**Sent:** Monday, February 3, 2014 5:38 PM  
**To:** [michalilana@earthlink.net](mailto:michalilana@earthlink.net)  
**Subject:** Follow Up

Dr. Freedhoff:

I apologize for the delay in getting this information to you, but now that we have completed the items on our action plan I want to report back to you with our findings and next steps.

Several aspects of the action plan were completed in November 2013. Specifically:

1. We inspected the overhead portion of the feeder, outside the boundaries of the community. No major issues were found but we identified some locations for the installation/replacement of animal guards, lightning arrestors, and cross-arm braces. The work is currently in design. A review of the ground resistance at the facility that feeds this neighborhood was conducted and its results were found to be within acceptable limits.
2. We inspected capacitors and regulators on the overhead portion of the feeder. These facilities were all found to be working properly.
3. We installed recording voltmeters at four transformers in the community. This activity was completed on November 20, 2013 and no issues were found.

We also inspected cables where visible and transformers, took neutral and secondary readings at various locations in the community, conducted an engineering review of cable and transformer sizing, and reviewed selected outage dates. Based on this review of the infrastructure, we have determined that an overall upgrade of the system would benefit the area.

The upgrades will include replacing cables and transformers. The crews have begun pre-construction work for this upgrade, such as marking utilities and reviewing the work area. The sub-zero conditions are not good for digging and trenching, which makes this work very weather dependant. We expect to complete the work between the first and second quarter of this year. I am sure this may be done earlier if weather cooperates.

If you have any questions or need additional information, please do not hesitate to contact me.

Best regards,

Jerry

Jerry Pasternak  
Vice President  
Pepco Region  
701 Ninth Street, NW  
Suite 9212 Washington, DC 20068  
(202) 872-2524 (office)  
(202) 872-2032 (fax)



## Attachment 2

**From:** [jpasternak@pepco.com](mailto:jpasternak@pepco.com) [mailto:[jpasternak@pepco.com](mailto:jpasternak@pepco.com)]

**Sent:** Friday, June 13, 2014 9:41 AM

**To:** [michalilana@earthlink.net](mailto:michalilana@earthlink.net)

**Subject:** Update on Work

Dr. Freedhoff:

Thank you for your patience. I had an opportunity today to discuss with our engineers the work that has been completed and is currently underway on Feeder 15111.

By way of background, we took several actions shortly after we met on November 6, 2013:

1. We inspected the overhead portion of the feeder, outside the boundaries of the community. No major issues were found but we identified some locations for the installation/replacement of animal guards, lightning arrestors, and cross-arm braces. We are currently working on the design and permitting for this work.
2. We conducted a review of the ground resistance at the facility that feeds this neighborhood and found the results to be within acceptable limits.
3. We inspected capacitors and regulators on the overhead portion of the feeder. These facilities were all found to be working properly.
4. We installed recording voltmeters at four transformers in the community. We found no issues.

We also inspected cables where visible and transformers, took neutral and secondary readings at various locations in the community, conducted an engineering review of cable and transformer sizing, and reviewed selected outage dates. Based on this review of the infrastructure, we determined to perform upgrades to the system, including replacing cables and transformers.

The cable replacement work, which you have noted appears on Attachment L to the 2014 Work Plan that we filed with the Maryland Public Service Commission on March 4, 2014, was completed in April 2014. The work consisted of replacing approximately 1,900 feet of underground cable. This work supplements the cable replacement work that we performed in the neighborhood a few years ago.

The transformer replacement work is now underway. We have identified ten transformers for replacement and anticipate completing this work by July 2, 2014. This schedule is, of course, subject to weather conditions. These transformer replacements will require planned outages, and we notify affected customers several days in advance of the outage.

With this work, we will have completed the system upgrades to Feeder 15111 and fulfilled the commitments we made to the community when we met last November. I want to thank you again for working with us and helping us achieve this result.

If you have any questions or need additional information, feel free to contact me.

Best regards,

Jerry

Jerry Pasternak  
Vice President

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Suite 9212  
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-----Original Message-----

From: [jpasternak@pepco.com](mailto:jpasternak@pepco.com) [mailto:[jpasternak@pepco.com](mailto:jpasternak@pepco.com)]  
Sent: Wednesday, June 18, 2014 3:34 PM  
To: Michal Freedhoff  
Subject: RE: Update on Work

Michal:

The cables were replaced along Hamilton Road between Lillystone Drive and Glenmore Spring Road.

There are hundreds of transformers on feeder 15111. The section that feeds this area is a part of feeder 15111. The transformers that will be replaced are near the following addresses:

7902 Park Overlook Drive  
8108 Hamilton Spring Road  
7904 Hamilton Spring Road  
8008 Hamilton Spring Road  
8105 Glenmore Spring Road  
8101 Glenmore Spring Road  
8011 Glenmore Spring Road  
7114 Glenmore Spring Way  
7711 Glenmore Spring Way  
7704 Glenmore Spring Way

Best regards,

Jerry

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