



Green Neighbors, an all-volunteer group of residents of the Petworth, Park View, Brightwood and Columbia Heights neighborhoods in Washington, DC, ***remains strongly opposed*** to the proposed merger of Pepco, our local utility, with Exelon.

Green Neighbors' mission is to lower our neighborhoods' emissions of carbon and other pollutants that contribute to global warming and to make renewable energy and other sustainable resources more accessible to everyone in our community. We see ourselves as part of a larger District-wide, regional, national and international movement to preserve our climate and planet for future generations.

We had expressed our opposition to the merger in an earlier public comment file with the Commission in January 2015. We reiterate our concerns here, because the settlement between the Bowser administration and the companies, while allegedly an improvement over the original merger proposal, does nothing to address the concerns we voiced earlier.

In our earlier comment, we had expressed our concern about how Exelon's business model is fundamentally at odds with the District's clearly articulated and visionary sustainability goals. We had noted that Exelon has a well-documented track record of using its lobbying clout to undermine net metering for distributed solar generation and to get rid of subsidies for wind energy, while at the same time benefiting from subsidies for nuclear and fossil fuel energy. Unfortunately, the Mayor's settlement with Exelon does not include any legally binding commitments by the company to mitigate the conflicts of interest. Nor does it include any legally binding commitments by Exelon not to lobby against net metering, or against the District's Renewable Portfolio Standards. ***Simply put, the Mayor's settlement with the companies does absolutely nothing to address the concerns we had raised about the merger earlier – it does not even attempt to address our concerns.***

Finally, the so-called benefits that the Mayor has negotiated with Exelon are either minimal (such as the small one-time credit on utility bills); very short term (such as the deferral of payments on rate increases until March 31, 2019, which will inevitably be followed by large rate increases); illusory (such as moving a facility from Virginia to DC and then claiming that the move increases jobs in the District, even though no more workers from the District will be hired); or unverifiable and unenforceable (such as the companies' vague promise to make "best efforts" to hire 102 union workers). The adverse effects of this merger will also have unequal impacts – the inevitable rate hikes that will start on April 1, 2019, will have a disproportionate impact on the most vulnerable District residents, such as low-income households and seniors.

***Green Neighbors thanks the Commission for unanimously rejecting the merger in August. We urge the Commission to recognize that the Mayor's settlement with the companies is hardly an improvement over the original proposal, and to reject the merger once and for all.***