



Office of the People's Counsel District of Columbia

1133 15th Street, NW • Suite 500 • Washington, DC 20005-2710
202.727.3071 • FAX 202.727.1014 • TTY/TDD 202.727.2876



Brenda K. Pennington
Interim People's Counsel

August 6, 2010

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: FC _____, In the Matter of an Investigation into the Electric Distribution System Reliability of the Potomac Electric Power Company in the District of Columbia

Dear Ms. Wideman:

Enclosed for filing in the above-referenced proceeding are an original and three (3) copies of the "Petition of the People's Counsel's for an Investigation into the Electric Distribution System Reliability of the Potomac Electric Power Company in the District of Columbia."

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

Sincerely,

Maggie Salah
Assistant People's Counsel
D.C. Bar No. 982618

Enclosure

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

In the Matter of	§	
	§	
The Petition for an Investigation into	§	Formal Case No. _____
The Electric Distribution System	§	
Reliability Performance of the	§	
Potomac Electric Power Company	§	
in the District of Columbia	§	

**PETITION OF THE OFFICE OF THE PEOPLE’S COUNSEL FOR AN
INVESTIGATION INTO THE ELECTRIC DISTRIBUTION SYSTEM RELIABILITY
OF THE POTOMAC ELECTRIC POWER COMPANY
IN THE DISTRICT OF COLUMBIA**

Pursuant to D.C. Code Ann. §§ 1-204.93, 34-808, 34-903, and 34-908, and Rule 101.1 and Rule 101.2 of the Public Service Commission’s (“Commission” or “PSC”) Rules of Practice and Procedure,¹ the Office of the People’s Counsel of the District of Columbia (“Office” or “OPC”) respectfully petitions the Commission under its plenary authority over the Potomac Electric Power Company (“PEPCO” or “the Company”) to initiate and conduct a formal investigation into the unplanned outages of electricity service from April 1, 2010 to the present.

With District ratepayers and consumers seeing distribution service rates increase by over \$47 million in the last two years, there is a reasonable expectation for receiving safe and reliable electric service. Even with these rate increases, District consumers continue to experience poor electric service with no assurance the problem will be specifically addressed.² This is unacceptable. PEPCO

¹ 15 D.C.M.R. §§ 101.1 and 101.2 (2008).

² Formal Case No. 766, *In the Matter of the Commission’s Fuel Adjustment Clause Audit and Review Program*, PEPCO’s 2010 Consolidated Report, pages 92-110 (Feb. 25, 2010); PEPCO’s 2009 Consolidated Report, pages 48-66

is required to provide safe, adequate and reliable service.³ Indeed, the Commission has found PEPCO's system performance to be poor.⁴ Ratepayers expect this Commission to require PEPCO to fulfill its legal obligation and exercise its legal authority to impose financial penalties on the company if its system reliability performance continues to be poor.

The Office is authorized to submit the instant petition for formal investigation to the Commission because it is the statutory legal representative of the District's utility consumers and ratepayers using products and services provided by public utilities under the jurisdiction of the Commission.⁵ Accordingly, the Office requests the Commission conduct a full and complete investigation of the performance of the District of Columbia's electric distribution system to ensure PEPCO is providing reliable service at just and reasonable rates. The Office further requests the Commission impose financial penalties for the Company's poor reliability performance.⁶

I. INTRODUCTION AND SUMMARY

The Office has been contacted by ratepayers and consumers throughout the city to assist them in their struggle to communicate and work with PEPCO to address the unplanned power outages and power restoration. These affected District ratepayers and consumers seek resolution of this matter, including a determination of the actual causes of the outages, PEPCO's plans for corrective action to

(Feb. 17, 2009);

Formal Case No. 991, *In the Matter of the Investigation into Explosions Occurring in or Around the Underground Distribution Systems of the Potomac Electric Power Company*, PEPCO's 2010 Consolidated Report pages 92-110 (Feb. 25, 2010); PEPCO's 2009 Consolidated Report, pages 48-66 (Feb. 17, 2009).

³ See, D.C. Code § 34-1101(a).

⁴ See, Formal Case No. 766, Order No. 15152 at ¶ 60 (Jan. 6, 2009).

⁵ D.C. Code § 34-804 (d) (2009).

⁶ D.C. Code § 34-706 (2009).

prevent such outages, and fair compensation and remedies for the damages they have suffered. As of the date of this filing, the affected ratepayers and consumers have been disappointed and unsatisfied with PEPCO's service reliability and are seeking answers to why the outages continue to persist.

For these reasons, the Office respectfully files this petition requesting the initiation of a formal investigation into the causes and resolution of the matter of these power outages experienced in the District of Columbia. The Office further requests that the Commission use the full breadth of its statutory plenary authority and responsibility to ensure the formal proceeding include: (1) a full investigation of the causes of the electric service outages and the power surges that occurred upon restoration of power. In particular, whether a trend exists as to the time of day of the outages⁷), (2) the condition of the system infrastructure in the affected areas, (3) the corrective actions necessary to enable the provision of safe and reliable service in the District, (4) PEPCO's efforts to resolve this problem, (5) the process by which PEPCO contacts customers to inform them of a planned outage, (6) PEPCO's efforts to compensate District ratepayers and consumers for losses sustained, (7) an evidentiary hearing and (8) a community hearing in each quadrant of the District for the public to air their concerns on the record.

II. JURISDICTION

A. Office of the People's Counsel

The Petitioner is the People's Counsel, acting under the Office's authority to represent District of Columbia consumers at hearings of the Commission involving the interests of users of the

⁷ By time of day, OPC means blocks of time: 6 a.m. to 12 P.M., 12 P.M. to 6 P.M., 6 P.M. to 12 a.m., and 12 a.m. to 6 a.m.

products and services furnished by public utilities under the jurisdiction of this Commission.⁸ The Office also has the authority to represent and appear for petitioners before the Commission for the purpose of complaining in the matters of rates or service.⁹ Further, the Office may investigate independently, or within the context of formal proceedings before the Commission, the services given by, the rates charged by, and the valuation of the properties of the public utilities under the jurisdiction of the Commission.¹⁰ The Office has the right to obtain from the public utility investigated all information and documents reasonably relevant to its investigation. If a public utility refuses or fails to produce the requested information in a timely manner, the Office may, by motion, petition the Commission to issue an order compelling its production.¹¹

B. Public Service Commission

The Commission has the statutory obligation to insure that every public utility doing business within the District of Columbia is required to furnish service and facilities reasonably safe and adequate and in all respects just and reasonable.¹² Further the Commission must ensure any facility or services furnished, or rendered, or to be furnished or rendered, shall be reasonable, just, and nondiscriminatory.¹³ The Commission has the authority, upon a reasonable complaint made against any public utility, to investigate that public utility if the public utility's services or time and

⁸ D.C. Code § 34-804 (d) (1).

⁹ D.C. Code § 34-804 (d) (3).

¹⁰ D.C. Code § 34-804 (d) (4).

¹¹ D.C. Code § 34-1118(c).

¹² D.C. Code § 1-204.93.

¹³ *Id.*

conditions of payment are in any respect unreasonable, insufficient, or unjustly discriminatory or that any service is inadequate or cannot be obtained.¹⁴ The Commission has the authority to inquire into any neglect or violation of the laws or regulations in force in the District of Columbia by any public utility.¹⁵

C. PEPCO

PEPCO is a corporation organized under the laws of the District of Columbia and is authorized to do business in the District of Columbia by virtue of the fact that it transacts business and derives substantial revenue within the District of Columbia by providing electric distribution services in District of Columbia, thereby subjecting it to the jurisdiction of the Commission as a public utility. PEPCO is required to “furnish service and facilities reasonably safe and adequate and in all respects just and reasonable.”¹⁶

III. STATEMENT OF PUBLIC CONCERN

OPC files this petition in response to a series of communications about the experience District ratepayers and consumers are experiencing with recurring power outages and the reports on outages from April 1 to June 30, 2010. Specifically, OPC has been contacted by the staff of several members of the Council of the District of Columbia representing residents of Wards 1, 4, 5, and 6 whose constituents have complained about problems with power outages and frustration with the process for filing claims for reimbursement for damages sustained during outages. Complainants

¹⁴ D.C. Code §34-908.

¹⁵ D.C. Code §34-402.

¹⁶ D.C. Code § 34-1101(a).

indicate the PEPCO claims process appears intended to discourage the filing of such claims. Additionally, OPC has been contacted directly by consumers complaining about power outages. OPC has also received a petition from affected residents of Ward 5 complaining about an outage they describe as lasting over a 30-hour period from July 5-8, 2010. (See Attachment A.) The Ward 5 residents indicated they were left without resources for food, water and ice replacement, hotel or shelter options. They further indicate PEPCO's lack of response to their concerns exacerbated conditions for seniors, the disabled, those with medical conditions, children and pets. Citing indifference in the communication of outage details from PEPCO during the multi-day disruption, residents are calling for changes in PEPCO's outage protocols. OPC received a formal letter from Ward 5 Council member Harry Thomas requesting the Office initiate a formal investigation into the citywide outages.

Since 2009 PEPCO has been required to file monthly outage data pursuant to Order Nos. 15131, 15155 and 15360.¹⁷ According to the most recent filing, there have been approximately 832 sustained outages from April 1, 2010 through June 30, 2010.¹⁸ These numbers do not include outages from the recent heat wave nor the events of July 25th and 29th. OPC is concerned about PEPCO's response to the major service outage on July 25th and is looking forward to reviewing PEPCO's major service outage report and thorough explanation of the July 25th sub-transmission

¹⁷ Formal Case No. 982, *Report of Potomac Electric Power Company Regarding Interruption to Electric Energy Service*, Commission Order No. 15131 (Dec. 2, 2008); Commission Order No. 15155 (Jan. 12, 2009) and Commission Order No. 15360 (Aug. 19, 2009);

Formal Case No. 1002, *In the Matter of the Joint Application of PEPCO and the New RC, Inc. for Authorization and Approval of Merger Transaction*, Commission Order No. 15131 (Dec. 2, 2008) and Commission Order No. 15155 (Jan. 12, 2009).

¹⁸ Formal Case Nos. 982 & 1002, PEPCO Monthly Report as required by Order Nos. 15131, 15155 & 15360 (July 15, 2010).

event. OPC reserves the right to submit comments regarding PEPCO's restoration performance.

IV. SPECIFIC RELIEF REQUESTED

Rule 101.2 authorizes the Commission, upon the petition of any person, to order a formal investigation.¹⁹ OPC respectfully petitions the Commission to initiate and conduct a formal investigation into the unplanned electric power outages experienced by District ratepayers and consumers. More specifically, the Office requests the Commission use the full breadth of its statutory plenary authority and responsibility to ensure that the formal proceeding include: (1) investigation of the causes of the electric service outages; (2) the condition of the system infrastructure in the affected areas; (3) the corrective action necessary to enable the provision of safe and reliable service to these District ratepayers and consumers; (4) PEPCO's efforts to resolve this problem; and (5) PEPCO's efforts to compensate its District residential customers for their losses resulting from PEPCO provided electric service.

V. BASIS FOR RELIEF REQUESTED

OPC, as the statutory legal representative of District ratepayers and consumers, must take appropriate steps to protect the interests of District ratepayers and consumers to ensure they receive safe, adequate and reliable electricity service as required by law.²⁰ To that end, there should be a formal Commission investigation and determination of the causes and appropriate resolution of all issues and matters regarding the power outages to ensure satisfactory and timely resolution of this matter.

The Commission has express authority to investigate and resolve the problem of unplanned

¹⁹ 15 D.C.M.R § 101.2 (2009).

electric power outages.²¹ The Commission further has the authority to direct PEPCO to make repairs, improvements, changes, or additions to service or equipment within a reasonable time if it determines that repairs, improvements or changes in any electric plant equipment should be made in order to promote the comfort or convenience of the public or employees, or in order to secure adequate service or facilities.²²

VI. REQUEST FOR FORMAL HEARING

D.C. Code § 34-908, D.C. Code § 34-914 and D.C. Code § 34-915 require the Commission to hold a formal hearing before issuing an order affecting the complained upon rate, regulation, act or making a final determination as to whether PEPCO is fulfilling its legal obligation to provide safe, adequate and reliable service in the District.

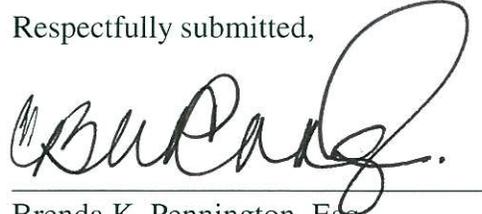
²⁰ See, D.C. Code. § 34-804 (2009).

²¹ D.C. Code §§ 34-908 and 34-914 (2009).

²² D.C. Code § 34-808 (2009).

WHEREFORE, for the reasons stated above, OPC respectfully requests the PSC grant this petition and conduct a full and complete investigation of the performance of the District of Columbia's electric distribution system to ensure PEPCO is providing reliable service at just and reasonable rates and convene a public hearing as required by the District Code.

Respectfully submitted,



Brenda K. Pennington, Esq.
Interim People's Counsel
D.C. Bar No. 478941

Sandra Mattavous-Frye, Esq.
Deputy People's Counsel
D.C. Bar No. 375833

Karen R. Sistrunk, Esq.
Associate People's Counsel
D.C. Bar No. 390153

Brian O. Edmonds, Esq.
Assistant People's Counsel
D.C. Bar No. 475869

Maggie Sallah, Esq.
Assistant People's Counsel
D.C. Bar No. 982618

OFFICE OF THE PEOPLE'S
COUNSEL
1133 15th Street, N.W., Suite 500
Washington, D.C. 20005
(202) 727-3071

Dated: August 6, 2010

ATTACHMENT A

***** PLEASE VOICE YOUR CONCERNS ON JULY 14, 2010 AT 12:00 PM IN
DISTRICT BUILDING ROOM *****

PLEASE REVIEW THE FOLLOWING IMPORTANT INFORMATION BEFORE FILLING OUT THE PETITION FORM!

Councilman Ward 5	Harry Thomas	724-8028
Office People Council	Melody Duggins	Email: DCROCKETT@DCCOUNCIL.US
	Herb Jones- Manager	727-3071
		261-1403
		FAX: 727-1014
PEPCO Claim Office	Claim #G20150008463	872-2452
PEPCO Outage Line		1-877-737-2662
Emergency Management Disable/Senior		727-6161

PEPCO ISSUES

1. Transformer
2. Cable Wires Burn
3. Old System Needs Replace
4. No Emergency Backup System or Generator

*Alley light + Street
light*

POWER OUTAGE APPROXIMATE TIME 30 HOURS OR MORE

1. MONDAY JULY 5, 2010 @ ~~7:00 PM TO 12:00 PM~~ *8:00 pm - 1:00 Am*
2. TUESDAY JULY 6, 2010 @ 7:30 PM TIL WEDNESDAY JULY 7, 2010 3:00 PM
3. WEDNESDAY JULY 7, 2010 @ 7:00 PM TIL 12: 00 ~~PM~~ *Am*
4. THURSDAY JULY 8, 2010 @ 1:27 PM APPROX AGAIN AROUND 3:00 THEN ANOTHER SHUT OFF @ 8:30 PM TO 11:00 PM

FILE COMPLAINT(S)

1. INCONVENIENT IN OVER 100 DEGREE TEMPERATURE (HEAT WAVE ADVISORY)
2. NO HOUSING OR ACCOMMODATIONS (HOTEL OR SHELTER)
3. NO FOOD OR WATER OR ICE REPLACEMENT
4. NO DISCOUNTS AVAILABLE; JUST AN INCREASE IN BILLS
5. TIME LOSS FROM WORK; PAIN AND SUFFERING
6. FRUSTRATION, MEDICAL CONDITION AND EXHAUSTION COMPLICATIONS ESPECIALLY WITH SENIOR, DISABLE, CHILDREN, PETS
7. NO FLASH LIGHTS, CELL PHONES, TRANSPORTATION, AND FAMILIES FOR ASSISTANCE

We, the citizens, refuse to allow the magnitude of this power outage addressed lightly. We pay according to PEPCO regulations and expect the company to provide updated technology, accommodation, excellent customer service and timely repair periods. The outage was detrimental which resulted in numerous uproars in our community. Yet the PEPCO response was a simply pat on the back. Therefore, our petition is drawn in effect for a change in PEPCO systems and protocols on addressing any futures blackouts. We, the following individuals agree change is necessary and therefore demand compensation for our concerns.

***** PLEASE VOICE YOUR CONCERNS ON JULY 14, 2010 AT 12:00 PM IN DISTRICT BUILDING ROOM *****

Name (Please Print Clearly)	Address	Phone	Email	Signature
Vanise T. Hight	46 Quincy Pl NE WDC 20002	2-792-2232	j-hi@verizon.net	[Signature]
Mary P. Taylor	16 Quincy PINE Wash DC 20002	2-635-3882		Mary P. Taylor
James Engelhardt	13 Quincy Pl NE, 20002	2-758-3873	James-Engelhardt@yahoo.com	[Signature]
Albert Ferriss	18 Quincy NE 20002	2-607-2873		Albert Ferriss
[Signature]	24 Quincy NE 20002	602-341-1111		[Signature]
Shellen Gardner	22 Quincy Place, NE		SkacLine@aol.net	[Signature]
KANISHA NORTIS	11 Quincy Pl NE	502-442-0067		[Signature]
BAYBOW GRAY	11 Quincy Pl NE	202-957-2355	bygray@comcast.net	[Signature]
Andrew Palmer	10 Quincy Pl. NE	202-957-2355	apalmer@comcast.net	[Signature]
Pier Torrey	11 R St NE Apt 204	2-832-1743		Pier Torrey
Kay Foyt	14 Quincy Pl. N.E.	832-317		[Signature]
Albert Evans	12 Quincy Pl. NE.	526-5399	evans@mfa.com	[Signature]
Samuel Hobbs	8 Quincy Pl. NE	2-832-8197		Samuel Hobbs
Charlene McCallister	54 Quincy Pl. NE	2-832-4849	charlene.mcCallister@yahoo.com	[Signature]
Brian Neal	4 Quincy Pl NE	2-635-2299	bneal7@comcast.net	[Signature]
JEN PERENA	20 QUINCY PLACE NE	571-241-9065	jenperena@aol.com	J.P.
HEATH BOPE	20 QUINCY PLACE, NE	432-940-2643	heathbope@msn.com	[Signature]
Brenda Crawford	5 Quincy Pl., NE.	2-526-0357	brcrawford@howard.edu	[Signature]

***** PLEASE VOICE YOUR CONCERNS ON JULY 14, 2010 AT 12:00 PM IN DISTRICT BUILDING ROOM

Name (Please Print Clearly)	Address	Phone	Email	Signature
Michael Flood	50 Q St., N.E.	2/438-2713	Michael.Flood@msn.com	Michael Flood
Joseph Richardson	419 Q St. NE	703 459 0745	joseph.richardson@gmail.com	J.R.
Jessica Schweiger	49 Q St. NE	401 419 7137	schweigerjessica@gmail.com	Jessica Schweiger
Sernathie McGowan	41 Q St. N.E.	215 26-4627	reesem1@msn.com	Sernathie McGowan
Jackie Pice	43 Q St NE	2/269-0946		Jackie Pice
Miaue Monds	39 Q St. NE	202-635-0449	miawemonds@normal.com	Miaue Monds
ROBERT LARIVIERE	33 Q ST NE	202 526-6772	robertandvirginia@verizon	Robert Lariviere
Chickano Martin	31 Q ST NE	301-237-4043	Chickano@central.com	Chickano Martin
Cassie Coppola	39 Q St NE	202-520-8335	ps1973@yahoo.com	Cassie Coppola
Wonne Springer	24 Q St. N.E.	2/635-2279	Wonne.Springer@gmail.com	Wonne Springer
Jenneth Sparrow	24 Q St. N.E.	11	Jenneth Sparrow	Jenneth Sparrow
Erin Kendrick	17 Q St. NE	573-590-4501	Kat.wolff@gmail.com	Erin Kendrick
SETH BOXAR	16 Q Smeat NE	202 488 8534		Seth Boxar
Ashley Ross	18 Q St. NE	641 821 0077	ashleyross@msn.com	Ashley Ross
Dwaine Hynes	36 Q St NE	202 269 3265	hynessed@out.com	Dwaine Hynes
Delepy Monroe *	44 Q St. NE	202 316 7485	monroedelepy-moore@att.net	Delepy Monroe
Lyla Jatum	8 Q St. N.E.	832-7299		Lyla Jatum
Laura August	16 Q St NE	587-0944		Laura August
Chevella Talbert	37 Q St NE	2/246-1520	Butterfly205@comcast.net	Chevella Talbert
Laura Johnson	18 Q St NE	314.323.5057	Laura.johnson@gmail.com	Laura Johnson
CAROL CHANNON	25 Q St. NE	202-26-1634	CHANNON@comcast.net	Carol Channon

QYAH.com

Council of the District of Columbia
Committee on Public Services and Consumer Affairs
Notice of Public Oversight Roundtable
1350 Pennsylvania Avenue, NW, Washington, D.C. 20004

2010 JUL -9 PM 2:47

OFFICE OF THE
SECRETARY

COUNCILMEMBER MURIEL BOWSER, CHAIR
COMMITTEE ON PUBLIC SERVICES AND CONSUMER AFFAIRS

Public Oversight Roundtable On

An Examination of Power Outages in the District of Columbia

Wednesday, July 14, 2010
12:00 p.m., Room 412
1350 Pennsylvania Avenue NW
Washington, D.C. 20004

Councilmember Muriel Bowser, Chair of the Committee on Public Services and Consumer Affairs, announces a Public Oversight Roundtable, *An Examination of Power Outages in the District of Columbia*. The roundtable will be held on Wednesday, July 14, 2010, at 12:00 p.m. in Room 412 of the John A. Wilson Building, 1350 Pennsylvania Avenue, NW.

Examination of Power Outages in the District of Columbia: The District and metropolitan region are in the midst of an unprecedented heat wave that has spurred demand for electricity to power air conditions. But, as demand increase so too does the likelihood for power outages. In fact, as of Thursday at 1 p.m., PEPCO was working to repair 60 power outages throughout the District and Montgomery and Prince George's counties, affecting approximately 1,600 customers. Power outages during the summer months are an inconvenience to many ratepayers but they also pose a significant risk to children, the elderly, and individuals with certain health conditions. This roundtable will examine, among other topics, the cause of power outages, measures to prevent power outages, the governmental response to power outages, and accommodations for ratepayer's affected by outages.

Members of the public are invited to testify. Testimony may be limited to 3 minutes per witness and 5 minutes for organizations. Those wishing to testify should contact Ms. Davida Crockett of the Committee on Public Services and Consumer Affairs via email at dcrockett@dccouncil.us, or by phone at (202) 741-0898, by Monday, July 12, 2010. Witnesses should bring 15 copies of their written testimony to the hearing.

Members of the public may submit written testimony which will be made part of the official record. Copies of written statements should be submitted to Ms. Cynthia Brock-Smith, Secretary to the Council, 1350 Pennsylvania Avenue, NW, Suite 5, Washington, DC 20004, no later than 5:00 p.m., July 21, 2010.

CERTIFICATE OF SERVICE

Formal Case No. _____, In the Matter of an Investigation into the Electric Distribution System Reliability of the Potomac Electric Power Company in the District of Columbia

I hereby certify that on this 6th day of August, 2010, a copy of the "Petition of the People's Counsel's for an Investigation into the Electric Distribution System Reliability of the Potomac Electric Power Company in the District of Columbia" was served on the following parties of record by hand delivery; first class mail, postage prepaid; or, electronic mail:

Richard Beverly, Esq.
General Counsel
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005

Deborah M. Royster
Potomac Electric Power Company
701 Ninth Street, N.W., Suite 1100
Washington, D.C. 20068
dmroyster@PEPCOholdings.com

Honorable Betty Ann Kane
Chairperson
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005
bakane@psc.dc.gov

Honorable Richard E. Morgan
Commissioner
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005
rmorgan@psc.dc.gov

Honorable Lori Murphy Lee
Commissioner
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 7th Floor East
Washington, D.C. 20005
llee@psc.dc.gov

Phylcia Fauntleroy Bowman
Executive Director
Public Service Commission of the
District of Columbia
1333 H Street, N.W., 6th Floor East
Washington, D.C. 20005

Honorable Muriel Bowser, Chairperson
Spencer Maguire, Legislative Director
Committee on Public Services
and Consumer Affairs
Council of the District of Columbia
1350 Pennsylvania Avenue, N.W., Suite 406
Washington, D.C. 20004


Maggie Sallah
Assistant People's Counsel