



Green Neighbors, an all-volunteer group of residents of the Petworth, Park View, Brightwood and Columbia Heights neighborhoods in Washington, DC, *strongly opposes* 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.

Our opposition to the merger stems from two key features of the current utility regime with Pepco that help us advance our goals, and that we have very good reason to believe will be undermined by Exelon: net metering for distributed solar energy, and consumer choice of electricity supplier.

Exelon has a well-documented track record of vigorously opposing any subsidies for wind and solar energy while ignoring the far larger subsidies for nuclear energy and fossil fuels. As one of the largest operators of nuclear power plants nationwide, Exelon directly benefits from nuclear subsidies. As a distribution utility buying power from producers, Exelon indirectly benefits from fossil fuel subsidies as well.

Exelon also has a record of contributing to lobbying organizations that are trying to undermine distributed solar energy generation by penalizing customers who own rooftop solar panels with additional charges. With net metering, electricity users who own rooftop solar panels already pay for any power they may draw from the grid but are paid by utilities for extra power they feed back into the grid at times when the solar panels are generating more power than the users need. Exelon misleadingly says that this means rooftop solar owners are imposing additional costs on the system. A more honest characterization is that rooftop solar owners' generation of their own power results in a smaller revenue stream for the utilities--hence the attempt to penalize them.

There is a very high probability that Exelon will bring its anti-clean energy lobbying agenda to Washington, DC to weaken or eliminate our Renewable Portfolio Standards and our local incentives for rooftop solar, and to impose penalties on rooftop solar owners. In fact, there is no assurance whatsoever that they will not do so. What lobbying against wind and solar subsidies (while leaving fossil and nuclear subsidies intact), and lobbying for financially penalizing rooftop solar owners, have in common is that they drive up the costs of clean energy compared to dirty energy, undermining a key goal of Green Neighbors – to make renewable energy and other sustainable resources more accessible to everyone in our community.

Finally, unlike Pepco (which is only a distributor of energy), Exelon generates energy as well, and therefore has an incentive to lobby our local government to eliminate consumers' ability to choose their electricity supplier. We are particularly concerned about this issue because our organization, in partnership with an allied organization called Groundswell, has helped several households in our neighborhoods join a discounted group purchase of 100% wind energy while remaining a Pepco customer. We will lose the ability to help our neighbors purchase clean electricity for less if consumer choice of electricity supplier were eliminated.

***Exelon's lobbying agenda, which we can reasonably expect them to continue in Washington DC, will therefore have a profound negative impact on one of our key objectives as a grassroots neighborhood organization, which is to maximize the conversion of households in our neighborhood, including low and moderate income households, to clean energy. We want to remind the Commission that any assurance from the company that they will not pursue such a lobbying agenda in Washington DC is both unverifiable and legally unenforceable, and therefore must be disregarded. Other testimony presented to the Commission has also made the case forcefully that the proposed merger is very likely to lead to higher utility bills for ratepayers. We strongly urge the DC Public Service Commission to uphold the public interest, which includes the interest of low income ratepayers as well as the interests of future generations threatened by climate change, by rejecting this dangerous merger proposal.***