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September 12, 2025

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Re: Formal Case No. 1149, In the Matter of the Investigation into the Structure and
Application of an Experimental Rate Class for Both Senior Citizens and Disabled
Residents in the District of Columbia

Dear Ms. Westbrook-Sedgwick:

Please find enclosed comments on the above-referenced proceeding. These comments
are submitted by the National Consumer Law Center, on behalf of our low-income
clients.

If there are any questions regarding this matter, please contact me at 202-452-6252 or
apizor@nclc.org.

Respectfully submitted,
/s/ Andrew Pizor
Andrew G. Pizor
Senior Attorney
National Consumer Law Center

Enc.
cc: Parties of record

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

In the Matter of Investigation Into the)	
Structure and Application of an)	
Experimental Rate Class For Both Senior)	Formal Case No. 1149
Citizens and Disabled Residents In the)	
District of Columbia)	

Comments by the National Consumer Law Center
Regarding the Expiring Senior Citizen and Disabled Rate Credit

The National Consumer Law Center submits these comments on behalf of its low-income clients. We encourage the Commission to explore ways to continue providing this credit to seniors and disabled ratepayers. For that reason, we support the Office of People's Counsel's three recommendations:

- (1) convene a technical conference to evaluate the Experimental Senior Citizen and Disabled Resident Rate Credit Rider (SCADRRC);
- (2) direct the submission of a technical conference final report with recommendations regarding the future of Rider SCADRRC; and
- (3) establish a regulatory asset, not to exceed an amount equal to the highest one-year period of Rider SCADRRC, for one additional year, to allow for Rider SCADRRC to continue until the Commission issues a final order regarding the future of the program.

Seniors and the disabled often live on fixed incomes. As the cost of living rises, they cannot adjust by simply working more hours. The monthly \$7.50 credit provided by the Senior Citizen and Disabled Resident Rate Credit Rider may seem small but it is about

3% of the average monthly cost of food for a 71-year-old adult living on the USDA's Thrifty Food Plan.¹ Thus, the credit is likely worth several meals per month for recipients.

Hotter summers also have a particularly harsh impact on these ratepayers.² Attempts to save money by foregoing air conditioning can have life-threatening consequences for the elderly and the disabled. The average summer temperature in the District has been steadily rising. In 1900 it was 76.8°F but, in 2010, the average hit a high of 81.3°F. (In 2024 the average was 80.9°F and 78.4°F in 2025).³

Seniors and disabled face greater risks from high utility bills but have less flexibility. For those reasons, we urge the Commission to not only order a technical conference to evaluate the discount but to also establish a one-year regulatory asset to continue the discount while the conference considers ways to continue the discount in some form.

Respectfully submitted,

/s/ Andrew Pizor

Andrew G. Pizor
Senior Attorney
National Consumer Law Center
D.C. Bar No. 457245
Dated: September 12, 2025

¹ "The Thrifty Food Plan, 2021 represents a nutritious, practical, cost-effective diet." USDA Food and Nutrition Service, Off'l USDA Thrifty Food Plan: U.S. Average, July 2025 (averaging values for a male and female of 71+ years of age), available at <https://www.fns.usda.gov/research/cnpp/usda-food-plans/cost-food-monthly-reports>.

² See Comments filed by Anne deBuys (Sept. 3, 2025) ("My 1955 building is poorly insulated . . . resulting in electric bills that can be excessive during the District's hottest and coldest months. Retired and living on a fixed income, I attempt to curtail the use of my PTACs, but I find that, as I get older, I am more sensitive to the negative effects of high temperatures. This past July I resorted to using the PTACs for air conditioning more than previously, reflected in my Pepco bills.").

³ Climate Data for Washington, DC, Nat'l Weather Service, retrieved from <https://www.weather.gov/media/lwx/climate/dcatemps.pdf> on Sept. 11, 2015.

CERTIFICATE OF SERVICE

Formal Case No. 1149, In the Matter of the Investigation into the Structure and Application of an Experimental Rate Class for Both Senior Citizens and Disabled Residents in the District of Columbia

I certify that on September 12, 2025, a copy of Comments by the National Consumer Law Center Regarding the Expiring Senior Citizen and Disabled Rate Credit was served on the following parties of record by electronic mail:

/s/ Andrew Pizor
Andrew G. Pizor

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