

March 17, 2026

To: Chair, Montgomery County Board of Appeals  
100 Maryland Avenue, Room 217  
Rockville, MD 20852  
via email to: [boa@montgomerycountymd.gov](mailto:boa@montgomerycountymd.gov)

Re: Request for a hearing on Potomac Electric Power Company's (Pepco) petition to modify a special exception at 10611 Westlake Drive in Bethesda

Dear Chair Hines:

I respectfully request a public hearing on the Board of Appeals' approval of Pepco's February 11, 2026 petition to modify a special exception. The resolution was adopted on February 25th 2026 and the effective date is March 6, 2026.

The petition was to install a new communications tower, new shelter, new diesel generator and to demolish the existing tower.

My concern is the addition of a 35 kW diesel generator changes the nature, character and intensity of the use and its effect on the immediate neighborhood.

Based on my review of Pepco's submission there is no indication of an existing diesel generator associated with the existing communications tower. The addition of a diesel generator is a change.

Diesel generators are a source of noise and air pollution. The associated 132 gallon diesel fuel storage tank carries risks of future spills and leaks that can contaminate the ground.

The proposed diesel generator will be located relatively close to adjacent properties to the south and within the original 200 tree buffer. These properties, previously zoned strictly for commercial use, are now zoned for mixed, commercial residential (CR). Residential uses are allowed.

Pepco's proposed installation of a new diesel generator at Bells Mill is contrary to environmental commitments they've made to the state - For example in Pepco's 2025 annual utilities report on the Climate Solutions Now Act of 2022 (Case 9665).

Battery energy storage systems (BESS) are a readily available alternative to the use of diesel backup generators. Such systems have a number of advantages over diesel backup generators:

- Silent operation
- Do not emit diesel pollution such as Carbon Dioxide and particulate matter
- Activate nearly instantly
- Low maintenance
- No risk of liquid fossil fuel spills
- State subsidies are available such as the Residential and Commercial Energy Storage Grant Program, offering a 30% rebate
- Can provide valuable grid services such as peak shaving

Installation of a BESS instead of a diesel backup generator would be more consistent with County, State and regional climate goals. Installation of a new diesel generator would be a missed opportunity.

Respectfully,



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cc: Ms. Regina Chang (rchang@nbcllc.com)  
County Executive Marc Elrich  
Jennifer Macedonia, Director, Montgomery County DEP  
County Councilmember Andrew Friedson  
Delegate Marc Korman, Chair, House Environment and Transportation Committee  
David Lapp, Maryland People's Counsel

attachments



**pepco holdings**<sup>SM</sup>

AN EXELON COMPANY

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Assistant General Counsel

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November 3, 2025

Andrew S. Johnston  
Executive Secretary  
Maryland Public Service Commission  
William Donald Schaefer Tower  
6 St. Paul Street, 16<sup>th</sup> Floor  
Baltimore, Maryland 21202

**Re: Case No. 9665 – Annual Report**

Dear Mr. Johnston:

Attached is Potomac Electric Power Company and Delmarva Power & Light Company's 2025 Annual Utilities Report on the Climate Solutions Now Act of 2022 in the above-referenced docket.

Please contact me if you have any further questions.

Sincerely,

/s/ **Douglas E. Micheel**

Douglas E. Micheel

Enclosure

cc: Lloyd Spivak, Staff Counsel  
David S. Lapp, Public Counsel

**Table 1: CSNA Goals to Report**

#	Description
(1)	Measures to decrease greenhouse gas emissions incident to electric distribution, including high levels of distributed energy resources and electric vehicles
(2)	Giving priority to vulnerable communities in the development of distributed energy resources and electric vehicle infrastructure
(3)	Energy efficiency
(4)	Meeting anticipated increases in load
(5)	Incorporation of energy storage technology as appropriate and prudent to: (i) support efficiency and reliability of the electric system; and (ii) provide additional capacity to accommodate increased distributed renewable electricity generation in connection with electric system modernization:
(6)	Efficient management of load variability;
(7)	Electric system resiliency and reliability;
(8)	Bidirectional power flows;
(9)	Demand Response (DR) and other non-wire and noncapital alternatives;
(10)	Increased use of Distributed Energy Resources (DERs), including Electric Vehicles (EVs)
(11)	Transparent stakeholder participation in ongoing electric system planning processes;
(12)	Any other issues the Commission considers appropriate.

**(1) Measures to Decrease Greenhouse Gas Emissions Incident to Electric Distribution, Including High Levels of Distributed Energy Resources and Electric Vehicles:**

**(1.1) Path to Clean Strategy<sup>1</sup>**

The Path to Clean strategy, which includes both Pepco and Delmarva Power, is an Exelon-wide quantitative and aggregate commitment to reduce Scope 1 and 2 operations-driven GHG emissions<sup>2</sup> by 50 percent by 2030 from a 2015 baseline and to achieve net-zero operations-

<sup>1</sup> This section on Path to Clean supports the following CSNA goals:

- Decreasing GHG emissions through fleet and building electrification, alternative fuels, SF<sub>6</sub> reduction, and grid modernization initiatives (Goal 1),
- Supports Energy Efficiency by guiding operational investments in buildings, fleet, and grid technologies that reduce emissions and system losses (Goal 3).

<sup>2</sup> Operations-driven emissions include 100 percent of Scope 1 GHG emissions and the portion of Scope 2 GHG emissions associated with building energy use.

driven GHG emissions by 2050. Operations-driven emissions are those that the PHI Utilities directly control, including those associated with buildings, fleet vehicles, and the use of SF6 insulating gas. In the near term, the PHI Utilities are focusing on aspects of the business where it can directly control GHG emissions through evolved work practices, building and fleet vehicle investments, alternative fuel strategies and deployment of new and expected future technologies to meet climate goals.

## Focus Areas and Actions to Cut Operations Emissions in Half by 2030

Company and Operations	
<b>Buildings</b>	Focus on energy efficiency (EE) and clean electricity for our operations <b>Examples:</b> audits, efficiency upgrades, zero-carbon electricity (nuclear) and renewable energy credit (REC) purchases, space optimization
<b>SF<sub>6</sub></b>	Invest in equipment and processes to reduce SF <sub>6</sub> leakage from our systems <b>Examples:</b> aging breaker replacement, leak management, and maintenance, SF <sub>6</sub> alternatives
<b>Vehicle Fleet</b>	Electrify 30 percent of our own vehicle fleet by 2025 and 50 percent by 2030 <b>Examples:</b> light-duty vehicle electrification and focus on fuel and operational efficiency

The PHI Utilities are beginning to explore GHG offsets and recognize that they will be needed to meet the 2050 Net-Zero goal for emissions that cannot be otherwise reduced (currently estimated at 20 percent of the expected Operations-Driven GHG emission inventory in 2050). The PHI Utilities are also observing that the science and guidance around the use of GHG offsets is still emerging (with a current focus being placed on carbon removal and/or sequestration offsets).

The Path to Clean program directionally aligns around decarbonization and integrates short-, mid- and long-term climate change imperatives into the business strategy. The PHI Utilities also recognize that there are opportunities to influence emissions beyond operations (Scope 3) as detailed in other sections of the report. The PHI Utilities continue to work on strategies to empower customers and support communities in further reducing GHG emissions by exploring efficient grid and energy management and grid modernization technologies to minimize system losses; advance transportation electrification and efficiency as well as conservation programs for customers; partner with communities to develop and implement clean infrastructure solutions that are accessible to all customers; The initiative aims to assist jurisdictions in achieving their climate and clean energy objectives by providing necessary resources and guidance. It also focuses on investing in and supporting small businesses that are addressing climate change challenges within local communities. Additionally, the strategy seeks to leverage digital solutions to facilitate the integration of clean technologies, enhancing efficiency and driving innovation in the transition to a sustainable energy future.

**(5) Incorporation of energy storage technology as appropriate and prudent to: (i) support efficiency and reliability of the electric system; and (ii) provide additional capacity to accommodate increased distributed renewable electricity generation in connection with electric system modernization:**

According to Wood Mackenzie's 2024 U.S. DER Outlook, projected that DER capacity is expected to grow by approximately 217 GW through 2028 — equivalent to 70% of anticipated bulk generation additions during the same period. Distributed solar and storage will account for nearly half of this growth, while flexible EV charging and building automation systems will make up the remainder.<sup>28</sup> Meanwhile, third-party companies are introducing tools to aggregate DER in a manner that can benefit the grid, customers and operations.

Energy storage costs have continued to decline. According to the National Renewable Energy Laboratory's (NREL) 2023 Cost Projections for Utility-Scale Battery Storage, battery costs could fall by up to 47% by 2030 under low-cost scenarios, and the NREL 2024 Annual Technology Baseline confirms that costs are expected to keep decreasing across all modeled cases, driven by falling battery component prices and manufacturing efficiencies.<sup>29</sup> Increased use of energy storage is anticipated by customers, other parties, and utilities. Energy storage systems can be installed in a variety of configurations, each of which will have different impacts and implications for the distribution grid. Various technical and regulatory issues will need to be addressed to provide safe and reliable integration of energy storage systems into the distribution grid in an efficient manner to not inhibit growth in energy storage development.

The PHI Utilities are actively seeking opportunities to site and implement energy storage where it makes sense to mitigate a power quality issue, increase reliability, increase hosting capacity or load factor on a distribution feeder(s) or to defer the need for capacity.

Pepco and Delmarva Power are participating in the PC 44 Maryland Energy Storage Program (MESP) Working Group which is considering issues relating to energy storage deployment in Maryland. In alignment with Senate Bill 0937, the Next Generation Energy Act and House Bill 910, Pepco and Delmarva Power continue to advance energy storage initiatives. As part of the commitment, both utilities will submit plans on November 3, 2025, to achieve one-third of their megawatt procurement targets.

As of April 2025, Delmarva Power's Ocean City Battery Energy Storage project became operational. Pepco's Fairmont Heights Microgrid and Livingston Road projects were withdrawn following implementation challenges. Pepco continues to participate in the Maryland Energy Storage Pilot Program through reporting and lessons learned requirements under PSC Order No. 91742.

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<sup>28</sup> Wood Mackenzie. *U.S. Distributed Energy Resources (DER) Outlook 2024*. Key findings on DER capacity growth and resource composition. Available at: <https://www.woodmac.com>

<sup>29</sup> National Renewable Energy Laboratory (NREL). (2023). *Cost Projections for Utility-Scale Battery Storage: 2023 Update*. <https://www.nrel.gov/docs/fy23osti/85332.pdf>; and National Renewable Energy Laboratory (NREL). (2024). *Annual Technology Baseline: Utility-Scale Battery Storage*. <https://atb.nrel.gov/electricity/2024/utility-scale-battery-storage>