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CONFIDENTIAL

August 13, 2025

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

Re: Consumer Complaint No. CC 2025-9075277–Levinson, Rebecca v. Potomac Electric Power Company

Dear Ms. Westbrook-Sedgwick:

Enclosed please find Potomac Electric Power Company's Motion to Dismiss Information Request in the above referenced matter.

Please contact me if you have any further questions.

Sincerely,

/s/ *Kunle Adeyemo*

Kunle Adeyemo

Enclosures

cc: All Parties of Record

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

IN THE MATTER OF

**REBECCA LEVINSON
Complainant,**

v.

**POTOMAC ELECTRIC POWER
COMPANY,
Respondent.**

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**Consumer Complaint
No. CC 2025-9075277-E-2**

**POTOMAC ELECTRIC POWER COMPANY
MOTION FOR DISMISSAL OF INFORMATION REQUEST**

On August 7, 2025, the Rebecca Levinson (“Complainant” or “Customer” or “Ms. Levinson”) through her Counsel the Office of People’s Counsel (“OPC”) filed Information Request (“DR” or “IR”) pursuant to Potomac Electric Power Company (“Pepco” or the “Company”). Pursuant to the District of Columbia Municipal Regulations, the Company notes this objection and seeks to dismiss or quash this IR.¹

I. MOTION

On August 7, 2025, Pepco was served with an information request from OPC regarding the above captioned matter. The IR did not articulate the basis nor authority for the request of information at this stage of the proceeding. Assuming the IR is filed pursuant to 15 D.C.M.R. 122.1, which states:

In proceedings where a utility company is a party, requests for information from the utility company shall be served on the company no later than thirty (30) days from the date of the Order and Report on the Prehearing Conference unless otherwise specified by the Commission. The utility company shall respond to each of

¹ 15 D.C.M.R. § 123.1.

the requests within twenty-one (21) days after service of the data request.

The conditions for filing an IR have lapsed as this filing is greater than “thirty (30) days from the date of the Order and Report on the Prehearing Conference.” Furthermore, the IR seeks Confidential information that is sensitive business information regarding algorithms and company operations.² Finally, the IR should also not be enforced as the Company has two pending Motions to Dismiss before the Hearing Officer.³

II. CONCLUSION

In light of the above, the Company requests that this IR be squashed.

Respectfully submitted,
POTOMAC ELECTRIC POWER COMPANY

By: /s/ Kunle Adeyemo
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² Although the IR should be squashed, Pepco is open to working with the Complainant, in fact much of the documents requested in the IR have already been provided to the Complaint and the Company will work to with OPC to find a manner to transmit the audio recordings.

³ In light of this status of this matter, this IR if not dismissed should be stayed pending a decision on the Motions to Dismiss.

CERTIFICATE OF SERVICE

I hereby certify that a copy of Potomac Electric Power Company's Motion to Dismiss Information Request was served this August 13, 2025 on all parties below by electronic mail:

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