

January 18, 2006

Honorable Samuel W. Bodman
Secretary of Energy
U.S. Department of Energy
1000 Independence Avenue, SW
Washington, D.C. 20585

Re: District of Columbia Public Service Commission, Docket No. EO-05-01

Dear Secretary Bodman:

In the above referenced order, responding to the D.C. Public Service Commission's petition, several inaccurate statements relating to environmental issues compel attention and correction.

First, and most egregious, is the DCPSC, PJM and PEPCO contention that "the plant operating at full power does not exceed emissions limits contained in the plant's operating permit and therefore the operation of the plant pursuant to the DOE Order would not violate the Clean Air Act." In referring only to the state operating permit, while concealing the overarching facts from the Downwash Study (August 2005) in which the plant exceeded NAAQS from four to fourteen times above federally-mandated limits as well as exceeded its NOX limit by 100% in Summer 2003, this statement results in a classic example of tortured logic in the service of suppressing facts.

Second, the order states that the Unit One operation does not cause any NAAQS exceedences. However, Sullivan Environmental Consultants' review (DOE website <http://www.electricity.doe.gov/about/dcpsc> Docket #EO-05-01 posting dated 12/19/05) refutes this conclusion, stating that no validation of this plan is possible due to missing information. Further, if the assumptions for Unit One can be validated, it is unlikely that operation of more units could be justified "without substantial changes to stack height and/or pollution controls for a wide range of pollutants" ("Conclusions," Sullivan Review).

Third, in an overall review of the order, it focuses almost entirely on reliability, giving scant attention to the serious environmental issues involved. Although incidental comments give passing reference and acknowledgment to this issue, the order fails to provide a full explanation of the serious public health risks at stake, relying instead on misinformation and omissions from other stakeholders.

Finally, it is unacceptable that Alexandria alone is required to bear the environmental burden of this order while others reap the benefits of energy production with no restrictions. It is also unacceptable that Alexandria alone has borne unlawful concentrated pollutants, greatly exceeding health standards, from this plant for over thirty years (August 2005 Downwash Study).

We, therefore, fully support the City of Alexandria's request to you for public disclosure of all documents and materials relating to this order.

Respectfully submitted,

Alexandria House Condominium Association, Elizabeth C. West, Vice-Chair
Harbor Terrace, Debra L. Johnson, Pres.
Marina Towers Condominium Association, Mary Harris, Rep., Board of Directors
North Old Town Independent Citizens (NOTICE), Roger Waud, Pres.
Canal Way Homeowners Association, Morrill E. Marston, Pres.
League of Women Voters of Alexandria, Laura Mandala and Judy Miller, Co-Chairs
Canal Place Condominium Association, Mary Jo Carden, Pres.
Pitt Street Station Homeowners
Hearthstone Mews Homeowners Association, Bob Hunter, Pres.
Rivergate Homeowners Association, Pam Reusing, Pres.
Potomac Shores Condominium Association, Andrea Grimaldi, Board Member
Watergate Homeowners Association, David Lavoie, Pres.
Cameron Station Civic Association, Mindy Lyle, Pres.
Old Town North Community Partnership, Agnes Artemel, Pres.
Del Ray Citizens Association Executive Board, Laurie J. MacNamara, Pres.
Carlyle-Eisenhower Civic Association, Bill Harvey, Vice-Pres., Land Use
Julie Crenshaw, Air Quality Public Advisory Committee, MWCOG
Elizabeth Chimento and Poul Hertel, Citizen Initiators, Mirant Plant Emissions Study