



June 26, 2024

Evan Glass - Chair, Transportation & Environment Committee, Montgomery County Council
Kate Stewart - Member, Transportation & Environment Committee, Montgomery County Council
Marilyn Balcombe - Member, Transportation & Environment Committee, Montgomery County Council

Re: Pepco street lighting and LED conversion

Dear Chair Glass and members of the Montgomery County Council T&E Committee,

The Sierra Club Montgomery County Group would like to reiterate our April 2024 budget testimony on the topic of Pepco street lighting. Specifically, we request that the County Council prioritize the Montgomery County Department of Transportation's acquisition of the 28,000 Pepco-owned street lights so that they may be converted to energy efficient, low maintenance LED technology.

Montgomery County is responsible for illuminating both County roads and state roads. The County budgets about \$9 million annually for electricity and maintenance for over 60,000 street lights (including those owned by the County and those owned by utilities)..

The County already owns and maintains about half the street lights – the ones on metal poles. The other half of the lights are owned and maintained by the utilities and are on wooden poles. Within the Pepco territory, Pepco owns about 28,000 street lights for which the County pays for electricity and maintenance.

Pepco's street lighting infrastructure is antiquated and its management of these assets has deteriorated. Pepco-owned lights in Montgomery County consume about 22 million kilowatt hours of electricity every year. Most are of the older types: high pressure sodium or mercury vapor. Only a small number have been upgraded to energy efficient, low maintenance LED technology.

Last month the Maryland Public Service Commission issued an [order in Case 9706](#) . The PSC confirmed significant deficiencies in Pepco's streetlight procedures and practices including inaccurate invoices, slow repairs and an erroneous online map for outage reporting. Pepco's monthly street lighting invoice for Montgomery County was found to be missing at least 2,000 County-owned streetlights. The PSC ordered Pepco to continue taking remedial action.

Thanks to the efforts of several Montgomery County municipalities in Case 9703 at the PSC, many of the issues related to county and municipal acquisition and upgrade of Pepco-owned street lights have been resolved. State and County elected officials, including Chair Glass, also [weighed in on that matter](#).

In 2021, the PSC also [rejected Pepco's earlier proposal in case 9655](#) to convert its streetlights to "smart" LED. The Commission ruled that the proposal, which drew opposition from street lighting customers and the public, was significantly flawed and reflected unnecessary costs, a lack of customer input, and a lack of flexibility.



The Montgomery County Department of Transportation has a much better track record than Pepco in managing street lighting assets and performing LED upgrades. For the County-owned lights on metal poles, MCDOT has been responsible for maintenance [since 1978](#). MCDOT has been able to procure vendors who can quickly and cost-effectively perform maintenance and LED upgrade tasks. Nearly 100% of these lights were converted to LED a few years ago, resulting in dramatic energy and cost savings as well as public safety improvements. MCDOT maintains a highly accurate online map for outage reporting.

We appreciate MCDOT's efforts to address the serious problem of light pollution by choosing fixtures which restrict upright and limit color temperatures to 3000 Kelvin or less. However, even this spectrum may cause more disturbance to insects and bats than the older sodium lights. Therefore we hope that MCDOT will choose LEDs with an even warmer spectrum when possible.

Regionally and nationally, local government ownership of street lighting infrastructure is a best practice. Since 2007 it has been Maryland state policy to allow local government acquisition of utility-owned street lights with enactment of [SB423/ HB875](#). The Maryland Energy Administration [issued a report on this topic in 2020](#). The District of Columbia Government [acquired Pepco's street lighting infrastructure in 1985](#) and is [scheduled to complete a full LED conversion this year](#). Local governments in states including Connecticut, Maine, Massachusetts, New York, Pennsylvania, and Rhode Island have successfully acquired utility-owned lights and completed LED conversions.

Pepco-owned lights represent the great majority of utility-owned lights in Montgomery County, and represent the largest opportunity for operational improvements at this time. The Council should direct MCDOT to begin negotiations to acquire Pepco's streetlights and upgrade them to LED as soon as possible. In addition to improved public safety, safe routes to school and support for Vision Zero, this will yield meaningful greenhouse gas reductions through energy savings as well as reduced maintenance expenses over the long term.

Acquisition and conversion of Pepco's street lights to LED is a shovel-ready project. It is time sensitive because state and federal funds are available to subsidize the upfront cost. There are also public and private sector financing options available that eliminate the need for up-front costs.

Thank you for considering our views.

Sincerely,

Darian Unger,
Chair, Executive Committee of Sierra Club Montgomery County

cc: At-Large Council Member Gabe Albornoz
At-Large Council Member Will Jawando
At-Large Council Member Laurie-Anne Sayles



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MONTGOMERY COUNTY, MD

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