



An Exelon Company



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OPPOSE – HB 84

House Bill 84 – State Highway Administration – Construction and Maintenance – Permit Requirements (Nighttime Construction Noise Reduction Act)

Potomac Electric Power Company (Pepco) and Delmarva Power & Light Company (Delmarva Power) oppose **House Bill 84 – State Highway Administration – Construction and Maintenance – Permit Requirements (Nighttime Construction Noise Reduction Act)**. House Bill 84 would prohibit the State Highway Administration (SHA) from issuing a permit for work to be conducted on State highways in a residential zone, commercial zone or an area within 500 feet of a residential or commercial zone between 10:00 p.m. and 6:00 a.m. the following day unless a zoning official determines that issuing the permit is in the interest of public safety, health or welfare.

Pepco and Delmarva Power are responsible for building and maintaining distribution and transmission projects, some of which are major infrastructure projects that require years of planning and take a significant amount of time to complete. Pepco and Delmarva Power have worked with SHA in the past to allow night work at specific locations for various reasons, but, we typically only schedule night work as a last resort. Our reasoning is based upon the increased cost of night work from a labor perspective; however, we also understand that night work is disruptive to our customers.

Frequently, Pepco, Delmarva Power and SHA, along with the contractor, review construction plans, discuss traffic control plans, and collaborate to determine whether night work is safer for pedestrians, bicyclist, and vehicles, due to the volume of traffic during daytime work hours as construction activities occur. Construction activities planned to occur during night work have low noise levels. The community is informed of the construction activities prior to work commencing and is updated throughout the course of the project.

Moreover, limiting or preventing the ability to work during evening hours is impracticable in some instances. There are two types of dielectric fluid-filled underground transmission cables frequently used in Maryland, called 'High-Pressure Fluid-Filled Cable' (HPFF) and 'Self-Contained Fluid-Filled Cable' (SCFF). When initially installed, these cable systems require the contractor to work 24-hours per day until completion of installation at manhole locations. The transmission cable is connected together in manholes by a splice (also commonly referred to as a joint). The process of splicing the cables together is a 24-hour process that cannot be interrupted without comprising the integrity of the splice and transmission line. This

work may be planned in the course of normal business hours to install new transmission cable as well as during emergency situations to make necessary repairs in the event of a failure. While these occurrences are infrequent, 24-hour accessibility is required to ensure the integrity of the dielectric fluid-filled underground transmission cable systems.

The electrical grid is a complex organism that relies on multiple components to ensure safe and reliable service to the public. House Bill 84 would put an undue burden on Pepco and Delmarva Power as well as the general public at large. For the above reasons, Pepco and Delmarva Power respectfully request an unfavorable vote on House Bill 84.

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