

Dec. 7, 2015

To: Brinda Westbrook-Sedgwick, Commission Secretary,
Public Service Commission of the District of Columbia,
1325 G Street, N.W., Suite 800,
Washington D.C. 20005

Re: Formal Case No. 1119

Dear Ms. Westbrook-Sedgwick,

On November 17, 2015 I testified before the DC PSC Chairman and Commissioners, in opposition to the proposed takeover by Exelon Nuclear of Pepco.

During my testimony I summarized the contents of an article by Dreux Richard, which appeared in the *Japan Times* on March 11, 2013, the second anniversary of the still ongoing Fukushima Daiichi nuclear catastrophe.

The article is entitled "Toxic management erodes safety at 'world's safest' nuclear plant: Echoes of Fukushima at Exelon's flagship Byron Station in Illinois."

The article is posted online at:

<http://www.japantimes.co.jp/news/2013/03/11/world/toxic-management-erodes-safety-at-worlds-safest-nuclear-plant/#.VmH0sntBJg7>

Please note that 13 photos related to the story accompany the text at the online posting.

The article relates numerous shocking examples of Exelon Nuclear's abuse of its own workers.

Whereas Exelon has promised to hire a certain, relatively small, fixed number of union workers, for a certain, albeit relatively short, time period, as part of the proposed Pepco takeover agreement, this article shows that Exelon Nuclear management has engaged in union busting tactics at its flagship nuclear power plant in Illinois. What was the gravest "crime" committed by the union at Byron, in Exelon managers' eyes, according to the article? Defending employees against abuse by those same Exelon managers. Such toxic corporate behavior could be brought to bear at Pepco in D.C. if Exelon is allowed to take over.

While proponents of the Exelon-Pepco merger tout the jobs it would preserve or even create, this article exposes shameful, harmful, and allegedly even fatal exploitation and harassment Exelon managers subjected their own employees to at Byron nuclear power plant in Illinois. The article alleges, based on interviews with Byron co-workers, that a number of Exelon employees were driven to commit suicide by the intense pressures Exelon managers brought to bear, and the oppressive abuse its managers heaped, on their own workers.

Other workers were driven to such excessive stress levels, and were subjective to such intense abuse, that they suffered debilitating illnesses, some of which resulted in death, including on the job.

Harassment, retaliation, scapegoating, cruel denial of health benefits and pensions, and job termination, are just a few of the "toxic," inhumane, and unaccountable "management practices" performed by Exelon Nuclear upon its own workers, as documented in this article.

A climate of fear prevailed in the Byron nuclear power plant control room, and elsewhere throughout the plant, consciously and deliberately fostered and fueled by Exelon's own top management, in order to advance their own careers, boost profits, lower costs, etc.

As the article reports, a common slogan Nuclear Station Operators (NSOs) who worked at Byron would cite to survive their abusive working conditions was "adapt, migrate, or die." Tragically and shockingly, a number of NSO suicides, and a stress-related death on the job, were documented in this article.

Shockingly, Exelon managers even abused workers with disabilities, resulting in worsening health conditions, which Exelon managers pressured the workers to ignore, at risk of otherwise being terminated, resulting in serious harm to the workers' health, including death.

Workers also realized that if they sought help for the psychological and psychiatric harm caused by Exelon's managers' abuse upon them, Exelon's managers would then use that very action of self-help to address deepening need as cause for job termination. Exelon's managers were heartless and merciless in their abuse of their own workers.

Of course, such a climate of fear, and intentional sabotaging of safety culture, meant that the safety of the broader region was also put at risk, due to the inherent, potentially catastrophic risks involved in nuclear power electrical generation.

I share this summary of this article's extensive documentation of Exelon's inhumane treatment of its own workers as a cautionary tale. Exelon Nuclear may institute abuse of Pepco workers in D.C., similarly to how it has abused Byron nuclear power plant workers in Illinois, as documented in this article. Such abuse of its own workforce puts its own workers' mental and physical health and well being at risk, to be sure. But workers forced to endure such abuse by Exelon management, cannot help but put the broader community's health and well being at risk, as they struggle day by day just to survive Exelon's abusive management practices, that encourage short cuts on safety to boost profits or advance managers' careers, at huge cost, harm, and risk to their own employees and the community at large.

When I testified to the Chairman and Commissioners, I promised I would send a copy of this article, in its entirety. I urged them to read the article from beginning to end, in order to see just what kind of a company Exelon Nuclear is, and how it abuses and harms its own workers in Illinois, even going so far as to "work" some workers to death. The

article's text is pasted into the body of this email, and is also attached in PDF format.

(I apologize for the links to other articles, and ads, included at the very end of the attached PDF, but I am unable to remove them).

I hope and pray that the Chairman and Commissioners will stand by their August ruling that Exelon's takeover of Pepco is not in the public interest. As this article makes all too clear, Exelon Nuclear is a company that puts its own workers and the broader community at serious risk, due to its greed-driven abuse of its own workforce and profit-driven short cuts on safety.

Thank you for considering my testimony, and for protecting Pepco workers and the broader D.C. community against such abusive practices by a rogue corporation like Exelon, by not allowing it to takeover Pepco, as you so wisely ruled a few months ago.

Sincerely,

Kevin Kamps, Beyond Nuclear