

December 6th, 2023

Dear Chairman Thompson, Commissioner Beverly and Commissioner Trabue,

We, the undersigned organizations, write to you today in opposition to Washington Gas' Project Pipes, and specifically Project Pipes Phase 3, which is currently under consideration by your Commission in Formal Case 1175.

Propping up the methane gas system is unjustifiable, especially in light of viable non-pipes alternatives for our energy needs. The DC government is already moving swiftly toward building electrification. The [Clean Energy DC Building Code Act of 2022](#) stipulates that by 2027, newly constructed buildings must meet net-zero energy standards and combust no fossil fuels on-site. The [Healthy Homes Act](#), legislation the Council is on track to pass early next year, will ensure that low- and moderate-income households are first to receive funds for home electrification. The Clean Energy DC plan and District law mandate that electrification is the method to move DC buildings off fossil fuels. Approving the next phase of Project Pipes will be in contravention of DC's climate commitments and will force DC residents to waste hundreds of millions of dollars for the replacement of infrastructure that is destined to become obsolete.

If the Commission approves the third phase of Project Pipes, it will allow Washington Gas to extend the lifetime of a fuel system that is making our children and vulnerable populations sick. The detrimental health impacts of burning methane gas in homes and buildings are [well-documented](#). Pollutants from gas appliances lead to [increased risks of asthma](#) – especially in children – along with other respiratory conditions. Recent research has also revealed that [gas stoves leak benzene](#), a known carcinogen. Gas appliances that vent outdoors, like gas furnaces and water heaters, cause outdoor air pollution and are precursors to the formation of smog.

Living in DC is [already unaffordable](#) for so many. If Project Pipes is approved in its entirety, the total estimated price tag of \$4.5 billion will be another financial burden that many residents cannot afford. As individual households and buildings transition off gas, the cost of Project Pipes will fall more and more heavily on those who remain on the system. As higher income households transition their homes off fossil fuels, the gas customer base will shrink and per-customer gas system costs will continually rise. If the Commission continues to approve massive Project Pipes spending proposals, it will place increasing financial burdens on those least able to afford it - lower-income homeowners and renters in particular.

The [substandard leak-repair performance](#) to date by Washington Gas through its accelerated replacement program does not justify spending hundreds of millions of additional dollars on Project Pipes. Washington Gas claims that Project Pipes is essential for safety and reliability, yet as we write this, 77% of the leaks on its system are currently classified as hazardous. Additionally, not all of the replacements are based on leaks or even on risk assessment; some are clearly intended for upgrading purposes.

If the Commission allows Project Pipes to continue, it will pose a threat to public health, the financial wellbeing of vulnerable DC residents, and DC's climate commitments. We call on you to put the interests of the people of DC before those of a for-profit utility, and reject Washington Gas' request to approve Project Pipes Phase 3.

Sincerely,

CCAN Action Fund Naomi Cohen-Shields, <i>DC Campaign Manager</i>	Interfaith Power & Light (DC.MD.NoVA) Joelle Novey, <i>Director</i>
Sierra Club DC Mark Rodeffer, <i>DC Chapter</i>	DC Environmental Network Chris Weiss, <i>Executive Director</i>
DC Voters for Animals Max Broad, <i>Executive Director</i>	Center for Biological Diversity Selah Goodson Bell, <i>Energy Justice Campaigner</i>
Metro DC DSA <i>DSA Members</i>	Ward 3 Democrats Beau Finley, <i>Chair</i>
We Power DC	Third Act (DC affinity group) Deirdre Joy, <i>Co-facilitator</i>
Nature Forward (formerly known as Audubon Naturalist Society) Lydia Lawrence, <i>Director of Conservation</i>	Third Act (VA affinity group) Lisa Finn, <i>Co-facilitator</i>
Third Act (MD affinity group) Laurie Welch, <i>Co-facilitator</i>	Anacostia Parks & Community Collaborative Brenda Lee Richardson, <i>Coordinator</i>
DC Asthma Coalition	Empower DC Parisa Norouzi, <i>Executive Director</i>
Moms Clean Air Force DC Chapter Samantha Schmitz, <i>DC Events Coordinator</i>	Georgetown Renewable Energy and Environmental Network (GREEN) Katherine Wijenaike Bogle, <i>Co-president</i>
Extinction Rebellion DC Philip Jakobsberg, <i>Member of Strategy and Stewardship Working Group</i>	Electrify DC Vanessa Bertelli, <i>Executive Director</i>
League of Women Voters of the District of Columbia Barbara Zia, <i>President</i>	Green New Deal for DC Oscar Villalobos, <i>Coalition Coordinator</i>
Howard University Water Environmental Association Emily Knisely-Durham, <i>Secretary</i>	Washington Interfaith Network

Ward 8 Woods Conservancy
Nathan Harrington

Institute for Policy Studies, Climate Policy
Basav Sen, *Climate Policy Director*