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February 5, 2024

VIA ELECTRONIC FILING

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 "G" Street, N.W., 8th Floor
Washington, D.C. 20005

**Re: Formal Case No. 1154
[Washington Gas – Reply Comments on PROJECTpipes 2
Management Audit Report]**

Dear Ms. Westbrook-Sedgwick:

Pursuant to the Public Notice issued by the Public Service Commission of the District of Columbia on December 22, 2023, in the above-referenced proceeding, Washington Gas Light Company hereby submits its Reply Comments on the PROJECTpipes 2 Management Audit Report.

Sincerely,

Cathy Thurston-Seignious
Supervisor, Administrative and
Associate General Counsel

cc: Per Certificate of Service

**BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

IN THE MATTER OF)
)
APPLICATION OF WASHINGTON GAS)
LIGHT COMPANY FOR APPROVAL OF) Formal Case No. 1154
PROJECTPIPES 2 PLAN)
)
)
_____)

**WASHINGTON GAS LIGHT COMPANY’S REPLY
COMMENTS ON PROJECTPIPES 2 MANAGEMENT AUDIT REPORT**

Pursuant to the Public Notice issued by the Public Service Commission of the District of Columbia (“Commission”) on December 22, 2023, in the above-captioned proceeding, Washington Gas Light Company (“Washington Gas” or “Company”) hereby submits its Reply Comments on the PROJECT*pipes* 2 (“PIPES 2”) Management Audit Report filed by Continuum on December 13, 2023, responding to the Office of the People’s Counsel for the District of Columbia’s Comments on Continuum Capital’s Audit Report of Washington Gas Light Company’s PROJECT*pipes* 2 Program (“OPC Comments”) and the District of Columbia Government’s Comments in Response to Public Notices Issued on December 22, 2023, and January 8, 2024 (“DCG Comments”) filed on January 22, 2024 in the above-captioned proceeding.

I. Washington Gas’s Response to OPC’s Comments

In its Comments, OPC suggests that it “wants the number of natural gas leaks to be reduced to eliminate both the safety risks involved and support the District’s climate

goal of reducing greenhouse gas emissions.”¹ Washington Gas’s PROJECT*pipes* (“PIPES”) program enhances safety and improves the reliability of the Company’s distribution system by accelerating the replacement of relatively higher-risk natural gas facilities that service District of Columbia (“District”) customers. Through 2023, the Company has replaced 36 miles of aging main and over 8,300 affected services. This translates to a reduction in greenhouse gas emissions (“GHGs”) by 30,652 metric tons, or the equivalent of removing 6,560 cars from the roadway. Furthermore, the Company’s PIPES program has resulted in a total leak reduction of 26% in the District between 2018 and 2022, made up of a 29% reduction in main leaks and a 22% reduction in service leaks.² With these leak reductions, Washington Gas saw a 27% decrease in corrosion leaks and a 26% reduction in pipe, weld and joint leaks, which are the leak types most attributable to the Company’s aging pipe. Therefore, the more aging infrastructure the Company replaces, the higher the probability that the reduction of the leaks will continue, which is accomplished from installing modern materials.

OPC states that “Continuum’s Audit found that WGL had only completed 871 of 2,922 services which is 30% of the three-year target for units and is lagging behind schedule so much that it is unclear how the uninstalled quantities will be distributed for completion at the end of PROJECT*pipes* 2...”³ This statistic is not accurate. The

¹ Formal Case No. 1154, *Office of the People’s Counsel for the District of Columbia’s Comments on Continuum Capital’s Audit Report (“Continuum Audit”) on Washington Gas Light Company’s PROJECT*pipes* 2 Program* at 3 (January 22, 2024).

² Does not include leaks caused by excavation damage, incorrect operations, natural forces and other outside forces.

³ While this quote is referenced as page 29 of the Continuum Audit by OPC, it is located on page 48 of the Continuum Audit.

targeted replacement units, set by the Commission in Order No. 20671,⁴ included 14.3 miles of main replacement, 570 services replaced with the main, 750 services transferred with the main, and 2,922 independent service replacements. This equates to 14.3 miles of main retirement and 4,242 affected services. The 2,922 quoted by both Continuum and OPC relates to *all* independent services replaced, not just Program 1 services. While Program 1: Bare and Unprotected Steel Service Replacements, is comprised of independent service replacements, the Company's Program 3: Vintage Mechanically Coupled Wrapped Steel Mains and Services and Program 5: Copper Service Replacement Program are also both comprised of independent service replacements; however, they were left out of the Company's totals. In 2021, the Company replaced 507 independent services in Programs 1, 3, and 5.⁵ In 2022, the Company replaced 880 independent services in Programs 1, 3, and 5.⁶ Therefore, at the end of the first two (2) years in PIPES 2, the Company had completed 1,387 independent service replacements and was trending to replace a higher number in 2023.

More important is the Company's performance in 2023. In 2023, the Company replaced 5.0 miles of main and completed 1,921 affected services.⁷ Throughout PIPES 2, the Company has replaced a total of 15.9 miles of main and replaced 3,657 services for a total rider surcharge of approximately \$148.7 million.⁸ ***Therefore, Washington Gas completed its PIPES 2 Program in accordance with the Commission requirements***

⁴ Formal Case No. 1154, *In the Matter of Washington Gas Light Company's Application for Approval of PROJECTPIPES 2 Plan*, Order No. 20671 at 92 (December 11, 2020).

⁵ Formal Case No. 1154, *Washington Gas's Annual Reconciliation Report* (March 31, 2022).

⁶ Formal Case No. 1154, *Washington Gas's Annual Project Reconciliation Report* (March 31, 2023).

⁷ Preliminary data, subject to change on the Company's Year 9 Annual Project Reconciliation Report to be submitted on March 31, 2024.

⁸ *Id.*

set in Order No. 20671, completing 111% of the targeted main retirement and 105% of the targeted service replacements.⁹ As stated by the Commission, these targets were set “to ensure that the program scope represents reasonable, cost-effective investments that will deliver lower system risk and reduced GHG emissions to the District and WGL’s customers,”¹⁰ which was achieved by Washington Gas.

OPC states that “the Commission should disregard Continuum’s conclusion”¹¹ that the Company’s PROJECT*pipes* 2 implementation reduced risk and enhanced safety in 2021 and 2022. OPC further states that “Continuum provided no measurement value for the purported risk reduction or safety enhancement. Therefore, there is no evidence contained in the Audit that WGL’s implementation of the PIPES Program reduced risk or enhanced safety,”¹² which is not accurate. Continuum’s statement was supported by its finding that all projects included by Washington Gas for replacement under PIPES 2 replaced “aging, corroded, or leaking cast iron mains, bare and/or unprotected steel main and services, vintage mechanical coupled wrapped steel main and services, copper services; and black plastic services in the distribution system.”¹³ Continuum went on to describe the data used to analyze the units and materials replaced under each PIPES program, including both installations and retirements, and stated that “material retirement data...was selected as the measure for this test because it would confirm that projects are correctly categorized, reducing risk, and enhancing safety.”¹⁴

⁹ This number includes services replaced with main and service only replacement. Also, these are preliminary numbers.

¹⁰ Formal Case No. 1154, Order No. 20671 at 92 (December 11, 2020).

¹¹ OPC Comments at 4.

¹² *Id.*

¹³ Continuum Independent Management Audit of PROJECT*pipes* 2 (December 12, 2023) at 18.

¹⁴ Continuum Audit at 20.

The programs and corresponding material types identified for replacement in PIPES 2 were a result of the Company's DIMP plan which operates and maintains the distribution piping system in full compliance with DOT 192 (and the District's corresponding regulations). DIMP had already identified these material types as "relatively high-risk" based on various factors, detailed in the Company's PIPES 2 supplemental testimony.¹⁵ The Commission upheld the distinction of these materials as higher risk facilities, approving Programs 1, 2, 3, 4, 5 and 10.¹⁶ Finally, the Company utilizes its risk-based model to select individual PIPES projects then adds the risk reduced per dollar filter, eliminating the most risk from the system on an annual basis.

By confirming that all PIPES 2-related projects replaced these previously identified materials, acknowledged as high-risk by the Commission, they ensured that the project reduced risk and enhanced safety. This is clearly evident in the Company's 26% leak reduction experienced between 2018 and 2022, in the District.

OPC contends that the Company's outdated calculated invoice practice highlights "WGL's lack of proper controls for the critical function of invoice submission."¹⁷ Washington Gas addressed the use of calculated invoices in its Comments on the Continuum Audit, submitted January 22, 2024, and incorporates them by reference.¹⁸ As the Company explained, its revised pay item approvals process does not include

¹⁵ Formal Case No. 1154, *Washington Gas's Supplemental Direct Testimony*, Exhibit WG (2A)-1 (April 23, 2020).

¹⁶ Formal Case No. 1154, Order No. 20671 (December 11, 2020).

¹⁷ OPC Comments at 4. While this quote is referenced as page 24 of the Continuum Audit by OPC, it is located on page 28 of the Continuum Audit.

¹⁸ Formal Case No. 1154, Washington Gas Comments on PROJECTpipes 2 Management Audit Report at 19-20 (January 22, 2024) ("Washington Gas Comments").

“calculated invoices.” The past “calculated invoices” practice had the proper controls in place; however, it was not in effect during PROJECTpipes and is, therefore, irrelevant.

OPC remarks that Continuum does not offer any data to support the justification that scattered service replacements tend to have higher variances.¹⁹ This statement by OPC is incorrect. Continuum states, “Scattered services *are the most challenging work type to both estimate and construct* and will yield the highest variance.”²⁰ Furthermore, Continuum stated, “[t]he variance observed, when viewed in the context of the total program spending, continues to exhibit a negative percent in total variance and remains reasonable and prudent.”²¹

OPC argues that Continuum found that an investigation into the variance in PIPES project costs is reasonable and prudent, but because Continuum does not state the impact of the additional cost on the rate payers, it is a ‘compelling reason’ to discontinue PIPES.²² Rate payers only pay for actual work completed; therefore, it was not necessary for Continuum to provide the additional cost impact on rate payers. The Company has successfully completed all targeted units in line with the Commission approved budget, providing no adverse effects to rate payers. Washington Gas has completed 111% of the targeted main retirement and 105% of the targeted service replacements for 99% of the Commission approved surcharge spend.²³ These

¹⁹ OPC Comments at 4-5.

²⁰ Continuum Audit at 22.

²¹ *Id.*

²² OPC Comments at 5.

²³ Preliminary data, subject to change on the Company’s Year 9 Annual Project Reconciliation Report to be submitted on March 31, 2024.

replacements have resulted in a 26% reduction in total leaks in the District, since 2018. Contrary to OPC's opinion, this is a 'compelling reason' **NOT** to discontinue PIPES.

Furthermore, OPC selectively ignored the other findings presented in the Continuum Audit. Washington Gas employs the use of Class 3 estimates in accordance with Order No. 18815,²⁴ which has an industry-accepted estimated accuracy of -20% to 30%. Yet, only three (3) of 61 projects in 2021 and five (5) of 81 projects in 2022 had a total project cost variance higher than 20% over the original Class 3 estimate.²⁵ In fact, individual programs had at most a two percent (2%) positive variance from the annual PIPES 2 costs in both 2021 and 2022, well in line with the Class 3 standard. While the Company provides individual project information to the Commission on a semi-annual basis, PIPES 2 is managed at a programmatic level. The Company has shown that it is able to do this successfully by completing the targeted number of units for the budgeted dollars, as approved in Order No. 20671, including a 15% reduction in expenditures to the Company's proposed budget.²⁶ If the Company-proposed expenditures had been approved, Washington Gas would have been able to remove additional risk from its distribution system.

OPC suggests that there should be a clear process that "limits WGL's surcharge recoveries to a specified level of cost variances, so that WGL will not recover costs

²⁴ GT97-3, *In the Matter of the Application of Washington Gas Light Company for Authority to Amend its Rate Schedule No.6*, GT06-1, *In the Matter of the Application of Washington Gas Light Company for Authority to Amend General Service Provision No. 23*, Formal Case No. 1027 *In the Matter of the Emergency Petition of the Office of the People's Counsel for and Expedited Investigation of the Distribution System of Washington Gas Light Company* and Formal Case No. 1115, *In the Matter of Washington Gas Light Company's Request for Approval of a Revised Accelerated Pipeline Replacement Plan*, Order No. 18815 (June 23, 2017).

²⁵ Continuum Audit at 31.

²⁶ Formal Case No. 1154, Order No. 20671 at 89.

through the surcharge for cost variances that exceed a specific measure.”²⁷ Merger Commitment No. 72, in Formal Case No. 1142, satisfies this recommendation by OPC. Merger Commitment No. 72 was intended to ensure that PIPES charges included in the rider were consistent, allowing for inflation and other outside cost pressures that may result in annual cost increases. This premise, however, only applies as long as the mix of work remains consistent throughout the PIPES program. The Company has experienced shifts in the mix of work throughout the PIPES program since the time of the merger agreement. Moreover, the target cost per foot has decreased in the last three (3) years, despite unit costs increasing due to inflation and outside cost pressures such as new Urban Forestry requirements and permitting changes. In fact, in the most recent filing the Company removed approximately \$3 million from the surcharge largely due to the mix of work varying from the baseline and the cost pressures from inflation and permitting requirements.

OPC states “Continuum noted exceptions for WGL’s prudent judgement and management.”²⁸ OPC goes on to state that “the Company is performing sub-optimally in more than one aspect of managing the construction projects.” However, OPC does not note the exceptions that Continuum describes leading to the questioning of “WGL’s prudent judgement and management,” because the exceptions do not demonstrate imprudence or mismanagement. In fact, Continuum explicitly states “Test 3...confirmed that overall annual cost variance data in 2021 and 2022 demonstrated project work came

²⁷ OPC Comments at 5.

²⁸ OPC Comments at 5-6.

in below estimate with negative total annual cost variances in both years and was carried out *prudently*.”²⁹

The exceptions noted by Continuum were due to eleven (11) projects that “were missing reasons for cost variance over the five percent (5%) threshold required.”³⁰ However, Continuum stated “the magnitude of the variance remains reasonable and prudent.”³¹ Washington Gas addressed this topic in response to Recommendation 1.1 in its Comments.³² In fact, Continuum has not stated in the audit report that the Company is mismanaging the program or performing “sub-optimally.”

OPC implies that Continuum’s recommendation to define a ‘new normal’ is equivalent to lowering the standards of the ARP program.³³ Establishing a ‘new normal’ is not equivalent to lowering the standards of PROJECT*pipes*. Due to the current external pressures regarding work compelled by others, including DC PLUG, and the ever-changing requirements imposed by the District Department of Transportation (“DDOT”) and other District entities discussed in the Company’s Response to Order No. 21940, filed on January 4, 2024, in this proceeding, and the technical conferences held in Formal Case No. 1154, there have been added pressures on all construction work in the District. While Liberty and Continuum stated that the performance expectations of PIPES were not being met, Washington Gas has replaced 15.9 miles of eligible main and replaced 3,657 services for a total PIPES 2 spend of \$148.7 million. This is in line with the plan approved by the Commission, resulting in completion of 111% of the targeted main, 105%

²⁹ Continuum Audit at 22 (emphasis added).

³⁰ *Id.*

³¹ *Id.*

³² Washington Gas Comments at 1.

³³ OPC Comments at 7.

of the targeted service replacement, and spending 99% of the approved dollars.³⁴ While OPC raises unsupported concerns about the Company's PIPES performance, PIPES 2 was executed per Commission Order No. 20671, even replacing an additional 11% of main and 5% of service replacements over the target while remaining under the \$150 million surcharge approval.

OPC argues that Washington Gas' failure to implement a master schedule should result in a litigated prudence review of associated costs.³⁵ OPC states that "Continuum found that WGL failed to develop a 'master schedule' that has "start and end dates, associated durations, and activities with relationships, that is updated regularly and reports progress back to the project team regarding schedule variance, noting that a master schedule would include all project activities, not just the construction portion."³⁶ Washington Gas is currently tracking all the items listed by OPC and has done so since the beginning of PIPES 2; however, different metrics were being tracked by different departments, such as Engineering, Permitting, Paving, Project Management and Construction. Most of these metrics are already reported to the Commission in the annual project list, the semi-annual project reconciliation report, and the annual project reconciliation report. More recently, in 2023, the Company established a combined master schedule, maintained by Project Management, incorporating the Liberty Audit and Continuum recommendations. Washington Gas has provided additional information in its Comments in response to Recommendation No. 2.5 and incorporates that information by

³⁴ Preliminary data, subject to change on the Company's Year 9 Annual Project Reconciliation Report to be submitted on March 31, 2024.

³⁵ OPC Comments at 8.

³⁶ *Id.*

reference.³⁷ These arguments made by OPC hold no merit, as both Continuum and Liberty found the Company's management and construction practices to be prudent, with Continuum stating, "Test 3...confirmed that overall annual cost variance data in 2021 and 2022 demonstrated project work came in below estimate with negative total annual cost variances in both years and was carried out *prudently*."³⁸

OPC requests that the Commission not approve the continuation of PROJECT*pipes*.³⁹ Washington Gas originally proposed a 5-year PIPES program with \$374 million in total spend. This included a \$177.4 million proposed spend in Programs 1, 2, 3, 4, 5 and 10 between 2021 and 2023. The Commission subsequently approved a reduced funding level of \$150 million over the three (3) years, representing a 15% reduction in the Company's proposed expenditures.⁴⁰ Even though the Commission reduced the funding level of PIPES 2, they did not reduce the number of units associated with the originally proposed dollars, setting replacement targets at 14.3 miles of main retired and 4,242 total affected services. Washington Gas exceeded these goals, replacing 111% of the targeted retirement and completing 105% of the targeted service replacements for a total rider surcharge cost of \$148.7 million, or 99% of the approved dollars.⁴¹ These efforts have resulted in a 26% reduction in total leaks in the District between 2018 and 2022. Therefore, the Company has fulfilled the Commission's goal to "ensure that the program scope represents reasonable, cost-effective investments that

³⁷ Washington Gas Comments at 6-8.

³⁸ Continuum Audit at 22 (emphasis added).

³⁹ OPC Comments at 9.

⁴⁰ Formal Case No. 1154, Order No. 20671 at 89.

⁴¹ Preliminary data, subject to change on the Company's Year 9 Annual Project Reconciliation Report to be submitted on March 31, 2024.

will deliver lower system risk and reduced GHG emissions to the District and WGL's customers"⁴² and should be continued.

II. Washington Gas's Response to DCG's Comments

Synapse Energy Economics ("Synapse") provided Figure 1 to demonstrate the annual average replacement rate for three (3) eras, including pre-PIPES, PIPES 1, and PIPES 2.⁴³ However, Synapse Energy is using the wrong annual averages for Figures 1, 3, 5, and 6. The Company's PIPES 1 Plan ran from 2014 through 2020, and PIPES 2 spans 2021 through 2023. Furthermore, Synapse included the units completed under Formal Case No. 1027, which is a separate accelerated replacement program. To create an accurate depiction of main replacements completed prior to the accelerated replacement programs, and after the initiation of the PIPES program, Formal Case No. 1027 units should be removed. This shows that the Company's annual replacement fluctuates within a mile based on the annual average. In the pre-PIPES 'era'⁴⁴ the Company completed 5.8 miles of replacement, 4.7 miles of replacement in the PIPES 1 era, and 5.6 miles of replacement in the PIPES 2 era. While the main has been relatively similar in each era, the number of service replacements has exponentially increased through PIPES 2, as well as the spend dedicated to the replacement of Washington Gas facilities. The Company's PROJECT*pipes* program has allowed Washington Gas to proactively replace both high-risk mains as well as high risk services, as shown by this increase. Furthermore, the Company has discussed the increasing costs of replacement

⁴² Formal Case No. 1154, Order No. 20671 at 92.

⁴³ Formal Case No. 1154, *The District of Columbia Government's Comments in Response to Public Notices Issued on December 22, 2023, and January 8, 2024* ("Synapse Memorandum") at 1 (January 22, 2024).

⁴⁴ The Company is using the term 'era' as defined by Synapse, of Pre-PIPES (2005 to 2013), PIPES 1 (2014 – 2020), and PIPES 2 (2021 – 2023).

work in the District in the Company's Response to Order No. 21940. This work has led to a reduction in total leaks in the District by 26% between 2018 and 2022.

Synapse stated that the average annual services replaced during PIPES 2 is higher than pre-PIPES but lower than PIPES 1.⁴⁵ This assessment is not accurate. Synapse used the wrong years for PIPES 1 and PIPES 2, in addition to the inclusion of Formal Case No. 1027 units as discussed previously. In the pre-PIPES era, the Company replaced 984 affected services on average, increasing to 1,325 affected services in the 'PIPES 1 era', and 1,842 affected services on average in the PIPES 2 era.

Synapse's Figure 5 displays the spend per mile of pipe replaced from 2005 to 2023. Synapse claims "the average annual spend per mile more than doubled from pre-PIPES to PIPES 1 and increased by nearly 70 percent from PIPES 1 to PIPES 2."⁴⁶ This calculation is incorrect due to Synapse's definition of the PIPES 1 era and PIPES 2 era. Furthermore, the Company has provided countless narratives on the increased costs affecting all construction work in the District, including a technical conference in Formal Case No. 1154, and most recently in the Company's Response to Order No. 21940.

Synapse's Figure 6 displays the spend per service replaced from 2005 to 2023. Synapse claims "the average annual cost per service increased by 65 percent from pre-PIPES to the PIPES 1 era and 75 percent PIPES 1 to PIPES 2."⁴⁷ This calculation is incorrect due to Synapse's definition of the PIPES 1 era and PIPES 2 era. Again, the

⁴⁵ DCG Comments, Synapse Memorandum at 3.

⁴⁶ *Id.* at 5.

⁴⁷ *Id.* at 6.

Company has provided detailed information on the increased costs affecting all construction work in the District.

Synapse argues that “WGL’s performance data does not show that PIPES 2 accelerates pipe and service replacement relative to performance in prior years.”⁴⁸ This statement is inaccurate. While the Company has replaced a similar amount of main footage in the three (3) eras identified by Synapse, Washington Gas has replaced an increasing number of services and has increased expenditures related to pipe replacement, both in normal and accelerated replacement. The Company’s normal replacement expenditures alone increased from \$12.8 million annually in pre-PIPES, to \$18.9 million annually during PIPES 1, and \$19.5 million annually during PIPES 2, in addition to the increasing expenditures made in the Company’s accelerated replacement program. The discrepancies in mileage are due to the mix of work required to be completed and increased costs the Company had previously explained affecting all construction work in the District.

Synapse states that “several of the Continuum Capital’s Independent Management Audit Report...scores and associated recommendations point to the fact that the PIPES 2 program could be better designed and implemented.”⁴⁹ The Company’s PIPES 2 program was implemented successfully and met the requirements set by the Commission in Order No. 20671, as previously discussed. Moreover, while Continuum made recommendations on facets of the program that could be improved, Continuum concluded “that the overall annual cost variance data in 2021 and 2022 demonstrated project work

⁴⁸ *Id. at 7.*

⁴⁹ *Id.*

came in below estimate with negative total annual cost variances in both years and was carried out prudently.”⁵⁰ Additionally, “Continuum found the program to be well run with several metrics and reports in place to monitor the performance of the current PROJECTpipes.”⁵¹ Washington Gas is constantly enhancing its program management and has replied to each individual audit recommendation in its Comments.

Synapse identified Liberty Audit Recommendation Nos. 1 and 9 that Continuum scored as “low-quality or weak” for implementation.⁵² Liberty Audit Recommendation No. 1 stated “Prepare for stakeholder dialogue a proposal to eliminate service-only replacements (Program 1), making them part of main replacements under Programs 2 and 4.” The Commission approved the distinction of service only replacement in Programs 1, 3, and 5, by approving them in Order No. 20671.

Liberty Audit Recommendation No. 9 stated: “Re-define “normal” replacement in light of experience and current infrastructure and risks and evaluate the institution of a work completion condition to expedited recovery of program expenditures. (Life-of-Plan).” The Company held a technical conference on October 21, 2021, where the parties discussed the normal and accelerated replacement work in accordance with Order No. 20762.⁵³ The technical conference was attended by Washington Gas, OPC, the Apartment and Office Building Association of Metropolitan Washington, DCG, Sierra

⁵⁰ Continuum Audit at 22.

⁵¹ *Id.* at 36.

⁵² *Id.* at 8.

⁵³ Formal Case No. 977, *In the Matter of the Investigation into the Quality of Service of Washington Gas Light Company, District of Columbia Division, in the District of Columbia*, Formal Case No. 1154, *In the Matter of Washington Gas Light Company’s Application for Approval of PROJECTPIPES 2 Plan*, and OPC2021-01-G, *The Office of the People’s Counsel for the District of Columbia’s Petition for an Investigation into Washington Gas Light Company’s System Leak Reduction Practices and Transparency*, Order No. 20762, (June 24, 2021)

Club, Environmental Defense Fund, DC Climate Action and Urbint. Therefore, there was stakeholder dialogue on this topic.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Cathy Thurston-Seignious".

CATHY THURSTON-SEIGNIOUS
Supervisor, Administrative and
Associate General Counsel

WASHINGTON GAS LIGHT COMPANY
1000 Maine Avenue, SW, 7th Floor
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CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 5th day of February 2024, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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A handwritten signature in blue ink, appearing to read "Cathy Thurston-Seignious". The signature is fluid and cursive, with a large loop at the end.

CATHY THURSTON-SEIGNIOUS