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February 16, 2024

VIA ELECTRONIC FILING

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. 977
[Washington Gas's Proof of Completion of Remedial Actions - PUBLIC

Dear Ms. Westbrook-Sedgwick:

Pursuant to the Warning Letter/Notice of Probable Violation ("NOPV")24-14-W (VIO2024-14-G), Washington Gas Light Company files it's "PROOF OF COMPLETION OF REMEDIAL ACTIONS.

The Commission's Office of Engineering and the Office of the People's Counsel are being served with copies of the confidential version via the Company's SharePoint site, pursuant to 15 DCMR § 3702.16.

Please do not hesitate to contact me if you have questions regarding this matter.

Sincerely,

Robert C. Cain

Robert Cain
Associate General Counsel
Office of the General Counsel

pc: Per Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF	)	
	)	
THE INVESTIGATION INTO THE	)	
QUALITY OF SERVICE OF	)	Formal Case No. 977
WASHINGTON GAS LIGHT COMPANY,	)	
DISTRICT OF	)	
COLUMBIA DIVISION, IN THE DISTRICT	)	
OF COLUMBIA		

PROOF OF COMPLETION OF REMEDIAL ACTIONS

Pursuant to the Warning Letter/Notice of Probable Violation ("NOPV")24-14-W (VIO2024-14-G) issued on February 9, 2024 by the Public Service Commission of the District of Columbia's Office of Compliance and Enforcement ("OCE"), Washington Gas Light Company ("Washington Gas", the "Company", or "WGL") hereby files its Proof of Remedial Actions concerning the 5-Day Report concerning the January 18, 2024 gas Incident that occurred at BEGIN CONFIDENTIAL [redacted] CONFIDENTIAL END. As required by the remedial actions, the Company addresses all non-compliances identified in the warning letter and demonstrate to the Commission the corrective steps the Company will deploy to complete 15 DCMR §§3701.9 and 3701.11 requirements for periodic reports following gas incident. As a result, the Company provides the following:

A. A Description of the Incident (15 DCMR § 3701.9 (a)(1))

1. WGL reporting – WGL described the gas explosion and fire as "011 – Broken Line Outage."

2. Staff Analysis and Comment – The incident's nature was apparent at the time and should have been described as a "gas explosion and fire." The Report should provide an accurate description of the incident.

Washington Gas Response: The initial call was a report of an odor from a broken line called in by a local citizen. As a result, the original report reflected broken line outage. At the time of Washington Gas's 5-day report submittal, Washington Gas should have revised the incident description to read ''explosion''.

Revised Response for 5-day Report
Explosion

B. The date(s) and time(s) when the Incident began and ended (15 DCMR §§ 3701.9 (a)(2) and 3701.11(a)

The incident began on January 18, 2024 at 9:40 AM; gas was off at 12:53 PM. Following "gas off", outage management operations commenced according to normal operating procedures.

C. The location(s) of the Incident(s), including street addresses and intersections, the ward(s) and/or quadrant(s) (15 DCMR §§3701.9 (a)(3) and 3701.11(b)

1. WGL reporting – WGL listed the incident address as **BEGIN CONFIDENTIAL** [redacted] instead of [redacted] **CONFIDENTIAL END**

2. Staff Analysis and Comment – The address provided was incorrect. WGL should have provided the correct address initially.

Washington Gas Response: This incident was called into the call center as occurring at **CONFIDENTIAL BEGIN** [redacted] **END CONFIDENTIAL.** The Company now understands there has been the renaming of Good [redacted] The Company is actively completing its mapping change process which entails a review of the extent of the renaming and timing of the change. All systems will be updated accordingly. Please note on January 25, 2024, the Company sent an email to the Staff of OCE and the Commission's General Counsel's Office to clarify that the street address for this incident reported in the January 23, 2024, Gas Emergency Report reflected the old street address for this location. The email also noted that the Company had updated on the report the new name for the street ([redacted]) and also included a copy of its January 25, 2024, Grade 1 Leak Report showing the correct name for the street. Please see Revised Response for 5-day report provided below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (b) (The location(s) of the incident(s), including street addresses and intersections, the ward(s) and/or quadrant(s)):

The incident location was **BEGIN CONFIDENTIAL** [redacted] **END CONFIDENTIAL**. That location intersects between [redacted] and [redacted] and is located in Ward 8.

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D. Pipe size, material, pressure and type of gas pipeline involved (15 DCMR §§3701.9 (a) (4) and 3701.11(c)

1. WGL reporting – WGL's 5-Day Report omitted pipe details and attributes. The 5-Day Report entered "2-inches" for pipe size and "high pressure" for pressure.

2. Staff Analyses and Comment – The pipe material, pressure, and type should be known at the time of the incident. The pipe size and pressure reported were inaccurate or missing in the 5-Day Report.

Washington Gas Response: The initial 5–day report shared initial information, unconfirmed by crews upon arrival. It should have contained confirmed pipe information. Please see Revised Response for 5-day report.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 c (Pipe size, material, pressure and type of gas pipeline involved):

The facilities responded to include a 2-inch medium pressure steel riser and a 2- inch plastic medium pressure service.

E. A preliminary assessment as to the cause(s) of the Incident(s), if known (15 DCMR §§3701.9(a) (5)

A large ice cream delivery truck was attempting a U-turn by backing into the public pedestrian space. In making this maneuver, the truck crossed over into the sidewalk area and struck Washington Gas's meter build up causing a leak on the riser below the riser shutoff valve.

F. The estimated number of customers and/or persons affected, if known and streets shut down (15 DCMR §§3701.9 (a) (6) and 3701.11(f))

1. WGL reporting – WGL listed only one affected customer in the 5-Day Report.
2. Staff Analyses and Comment – WGL reported via phone updates that more than 30 customers were affected. However, WGL underreported the number of affected customers in the 5-Day Report.

Washington Gas Response: At the time this incident occurred it was only known that one person was affected. However, it was later determined that 37 other residents were affected by this incident. Although this information was communicated by phone, it was not included in the automated notifications from Everbridge, or subsequent reports, because the information had not been updated in the reporting system. It was later learned that 38 people were affected by this incident. That updated information was never inputted into the system.

Revised Response for 5-day report per regulations:

15 DCMR § 3701.11 (f) The estimated number of customers and/or persons affected, and street shutdowns;

The number of affected customers is 36. The intersection of [redacted] and [redacted] were closed due to this incident.

G. The date(s) and time(s) the Natural Gas Utility received the first call regarding the incident(s) or became aware of the incident(s) (15 DCMR § 3701.11(d))

Washington Gas received the first call regarding the incident on January 18, 2024 at 9:40 am.

H. The date(s) and time(s) when the Incident began and ended (15 DCMR § 3701.11(e))

The incident began on January 18, 2024 at 9:40 AM; gas was off at 12:53 PM. Following "gas off", outage management operations commenced according to normal operating procedures.

I. The steps the Natural Gas Utility took to provide assistance (15 DCMR § 3701.11(g))

1. WGL reporting – WGL stated that "crews completed their investigation…" in the 5-Day Report. However, WGL did not provide the steps it took to assist at the incident site.
2. Staff Analyses and Comment – WGL failed to detail the steps it took to assist as required by the regulations.

Washington Gas Response: Please see Revised Response for 5-day report below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (g): The steps the Natural Gas Utility took to provide assistance

Under such circumstances, the fire department is in charge of the scene. Once Washington Gas crew arrived on the scene, the crew coordinated with the fire department to isolate the affected piping and secure the gas fed fire. Washington Gas

J. The amount of time it took for assistance to arrive (15 DCMR § 3701.11(h))

1. WGL reporting – The 5-Day Report did not specify the time it took WGL's assistance crew to arrive at the site.
2. Staff Analyses and Comment – WGL should specify the amount of time it took for the Company's assistance crew to arrive at the incident site.

Washington Gas Response: Please see Revised Response for 5-day Report below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (h): The amount of time it took for assistance to arrived
15 DCMR § 3701.11 (i): The date(s) and time(s) of arrival of the first Natural Gas Utility responder to the scene of the incident;

The first WGL Technician arrived onsite within 36 minutes of the original customer call being received. The first WGL Technician encountered closed roads from the event, which prompted WGL Dispatch to contact the fire board to get assistance to access the site. The additional Washington Gas crew and the supervisor arrived shortly thereafter to provide assistance.

K. The date(s) and time(s) of arrival of the first Natural Gas Utility responder to the scene of the incident (15 DCMR § 3701.11(i))

The Company's first responder to the scene of the incident arrived on January 18, 2024 at 10:16 AM.

L. The date and time the area was made safe (15 DCMR § 3701.11(j))

1. WGL reporting – WGL did not indicate when the incident site was made safe.
2. Staff Analyses and Comment – As the regulation requires, WGL must include the date and time the incident area was made safe in the 5-Day Report. The 5-Day Report reflects an End Date and Time but does not verify when the incident area was made safe.

Washington Gas Response: Please see Revised Response for 5-day report below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (j): The date and time the area was made safe

The area was made safe by turning gas off at 12:53 PM on January 18, 2024.

M. The total number of injuries, hospitalizations, and fatalities (15 DCMR § 3701.11(k))

1. WGL reporting – WGL stated in the 5-Day Report that no injury was reported.
2. Staff Analyses and Comment – A media report noted that one person was hit by flying debris from the building explosion. Therefore, WGL should have reported this injury.

Washington Gas Response: Please see Revised Response for 5-day report below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (k) :

There were no fatalities. The Company understands that one citizen was injured as reported by the media and that person was transported to the hospital.

N. An estimated total dollar amount of damage and loss to the Natural Gas Utility caused by the incident(s) if known (15 DCMR § 3701.11(l))

1. WGL reporting – WGL did not include damage estimates and the amount of gas lost to the utility in the 5-Day Report.
2. Staff Analyses and Comment – To the extent known, WGL should have included the estimated damage and loss of gas in its 5-Day Report.

Washington Gas Response: Please see Revised Report for 5-day report below.

Revised Response for 5-day report per regulations:
15 DCMR § 3701.11 (l) : An estimated total dollar amount of damage and loss to the Natural Gas Utility caused by the incident(s) if known

The estimated total dollar amount of damage and loss to the Natural Gas Utility caused by this incident is $96,613.

O. A description of the Incident(s) and provide a root causes analysis of the Incident(s) and steps the Natural Gas Utility will implement to prevent such an occurrence in the future. (15 DCMR § 3701.11(m))

1. WGL reporting – As the root cause of the incident, WGL stated, "BROKEN LINE. Technician or crew has completed their investigation. The job has been completed per the following completion codes, 011 – Confirmed Broken Line Outage." To prevent future occurrences, WGL avers that it "will leverage the damage remediation plan for events caused by 3rd party damage." Further, WGL stated that "[o]ther events will be addressed thru accelerated [pipe] replacement, leak survey[,] [and] DIMP programs."

2. Staff Analyses and Comment – WGL did not mention that a delivery truck hit the outside gas meter at [redacted] Further, the preventive measures outlined by WGL did not include measures to prevent vehicular damage to the outside gas meters, e.g., the installation of bollards around the outside meter sets.

Washington Gas Response: The quotes in the OCE comments reflect options provided in the Gas Emergency Report. Details are provided in the Report below.

Revised Response for 5-day report per regulations:

Root cause

Subject to confirmation, a large ice cream delivery truck was attempting a U-turn by backing into the public pedestrian space. In making this maneuver, the truck crossed

over into the sidewalk area and struck Washington Gas's meter build up causing a leak on the riser below the riser shutoff valve. Subsequently, a flash fire occurred on the second floor of 1225. Minutes later, an explosion occurred at 1223.

Steps to implement to prevent such an occurrence in the future.

Washington Gas is actively reviewing the incident and will determine steps to prevent future occurrences.

Washington Gas's Corrective Action to comply with 15 DCMR Sections 3701.9 and 3701.11 requirements for periodic reports following gas incidents

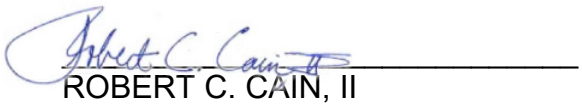
In the future before the 5-Day Report is filed, it will be reviewed by the Director of Dispatch and the Director of Business Intelligence and Data Analytics.

The Company will file a separate stand-alone Revised 5-Day Report.

WHEREFORE, Washington Gas respectfully requests the Commission accept the information provided above for the Proof of Remedial Actions.

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Respectfully submitted,



ROBERT C. CAIN, II
Associate Legal Counsel

MEERA AHAMED
Counsel

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Dated: February 16, 2024

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 16th day of February 2024, I caused a copy of the foregoing document to be hand-delivered, mailed, postage-prepaid, or electronically delivered, to the following:

Christopher Lipscomb, Esquire
Kimberly Lincoln-Stewart, Esquire
Aaron Herbert, Esquire
Udeozo Ogbue, P. Eng., DBM
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