



Sandra Mattavous-Frye, Esq.
People's Counsel

May 6, 2024

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. 1154, In the Matter of the Application of Washington Gas Light Company for Approval of PROJECTpipes2 Plan

Dear Ms. Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding, please find the *Office of the People's Counsel for the District of Columbia's Motion for Status*.

If there are any questions regarding this matter, please contact me at 202.727.3071.

Sincerely,

/s/ Laurence C. Daniels

Laurence C. Daniels
Director of Litigation

Enclosure

cc: Parties of Record

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

In the Matter of:)	
)	
Washington Gas Light Company’s Application for Approval of PROJECTpipes 2 Plan)	Formal Case No. 1154
)	

**OFFICE OF THE PEOPLE’S COUNSEL
FOR THE DISTRICT OF COLUMBIA’S
MOTION FOR STATUS**

I. INTRODUCTION

Pursuant to Rule 105.8 of the Public Service Commission of the District of Columbia’s (“Commission” or “PSC”) Rules of Practice and Procedure, 15 D.C.M.R. § 105.8 (2017), the Office of the People’s Counsel (“OPC” or “Office”), the statutory representative of District of Columbia ratepayers in utility proceedings,¹ respectfully submits its Motion for Status on the Commission’s Order No. 21960² that extended Washington Gas Light Company’s (“WGL” or the “Company”) PROJECTpipes 2 Program for twelve (12) months. Specifically, by way of this motion, OPC requests the Commission issue an order setting forth a procedural schedule and policy framework to make a decision regarding PROJECTpipes 2 prior to February 25, 2025.

II. BACKGROUND AND PROCEDURAL HISTORY

On March 31, 2014, the Commission approved the first five (5) years of WGL’s proposed 40-year Revised Accelerated Pipe Replacement Plan (“PIPES 1”).³ On December 7, 2018, WGL filed its *PIPES 2 Application* with the Commission, requesting approval of the Company’s next

¹ D.C. Code § 34-804

² *Formal Case No. 1154*, Order No. 21960, February 23, 2024.

³ *Formal Case Nos. 1093 and 1115*, Order No. 17431 at ¶1, March 31, 2014.

five years (i.e., October 1, 2019 through December 31, 2024) of PROJECTpipes, during which time it proposed to engage in eight distribution replacement programs and five transmission replacement programs at an estimated total cost of \$305.3 million.⁴ By Order No. 20671, the Commission approved PROJECTpipes for 2021 through 2023 (PIPES 2) with spending caps established at \$150 million.⁵

On November 6, 2023, WGL filed a Motion for Extension of the PIPES 2 Plan for one (1) year, to December 31, 2024, with a spending cap of \$57.3 million.⁶ By Order No. 21960, the Commission extended PIPES 2 and the surcharge for an additional twelve (12) months through February 2025, with an eligible targeted spend of \$50 million.⁷ The Commission stated that “[t]his extension period will allow the Commission to evaluate how we appropriately move forward with WGL’s request to continue replacing high-risk leak-prone aging infrastructure subject to increased risk of leaks and/or failure.”⁸

III. DISCUSSION

A. OPC requests the Commission issue an order outlining a procedural schedule and policy framework to make decisions about PROJECTpipes 2.

OPC seeks to ensure a safe and reliable natural gas infrastructure in the District of Columbia, and is mindful that the Council of the District of Columbia has stated that “*PROJECTpipes does not align with the new, fossil-free future that the Council has charted.*”⁹ Therefore, OPC urges the Commission to conduct the appropriate evaluation in accordance with its stated rationale for its extension of PIPES 2.¹⁰

⁴ Formal Case No. 1154, PIPES 2 Application.

⁵ Formal Case No. 1154, Order No. 20671 at ¶1, December 11, 2020.

⁶ Formal Case No. 1154, Motion for Extension at 3-6.

⁷ Formal Case No. 1154, Order No. 21960 at ¶¶13-14, February 23, 2024. (Order No. 21960)

⁸ Id. ¶ 13.

⁹ Formal Case No. 1175, In the Matter of the Washington Gas Light Company’s Application for Approval of PROJECTpipes 3 Plan, Council of the District of Columbia Comments, February 7, 2024.

¹⁰ Order No. 21960 at ¶13.

Specifically, OPC requests that the Commission adopt a procedural schedule that will ensure (1) robust stakeholder participation in the PROJECTpipes evaluation process, and (2) a conclusion of the evaluation and Commission decision prior to the end of the PIPES 2 extension in February 2025. The Office requests that the Commission act urgently to avert the risk of failing to complete a robust evaluation prior to February 2025 or further extending the project at ratepayer cost while WGL continues failing in its obligation to reduce leaks as a part of its regular operations and maintenance.

Additionally, OPC requests the Commission issue an order that includes a schedule, a list of critical policy questions to be decided, and the evaluation process to be utilized for any project adopted to replace PROJECTpipes. OPC reiterates the urgent need for the District of Columbia to establish a cohesive strategy and an integrated plan that ensures a reliable natural gas infrastructure for meeting the energy needs of the city while advancing its energy goals.

IV. CONCLUSION

WHEREFORE, OPC respectfully requests an order detailing the status of the aforementioned Commission evaluation, and issuance of a procedural schedule that will ensure conclusion of a robust evaluation process prior to February 2025.

Respectfully submitted,

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Dated: May 6, 2024

CERTIFICATE OF SERVICE

Formal Case No. 1154, In the Application of Washington Gas Light Company for Approval of PROJECTpipes 2 Plan

I certify that on May 6, 2024, a copy of the *Office of the People's Counsel for the District of Columbia's Motion for Stay* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

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