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May 10, 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's Response to OPC's Motion for Status]**

Dear Ms. Westbrook-Sedgwick:

Washington Gas Light Company hereby submits its Response to the Office of the People's Counsel for the District of Columbia's Motion for Status filed in the above-referenced proceeding.

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

Pursuant to the Public Service Commission of the District of Columbia’s (“Commission”) Rules of Practice and Procedure, 15 DCMR §105.8, Washington Gas Light Company (“Washington Gas” or “Company”) hereby responds to the Office of the People’s Counsel for the District of Columbia’s Motion for Status, filed on May 6, 2024, in the above-captioned proceeding (“OPC Motion”). For the reasons discussed herein, OPC’s Motion should be denied.

Washington Gas opposes OPC’s request to adopt a procedural schedule, in the instant proceeding, to examine issues pertaining to the continuation of PROJECT*pipes* (“PIPES”). Rather, Washington Gas urges the Commission to establish a procedural schedule in Formal Case No. 1175, wherein the Commission is examining the Company’s application for approval of the PIPES 3 Plan. In its Order granting an extension of the PIPES 2 Plan, the Commission stated, “In managing the Commission’s caseload, we decided to address WGL’s extension of time request for the PIPES 2 Program first, reasoning that the extension would allow the Commission to evaluate how we

appropriately move forward with WGL's (**PIPES 3**) request to continue replacing high-risk leak-prone aging infrastructure subject to increased risk of leaks and/or failure (OPC's investigation request)."¹ In Formal Case No. 1175, the Commission will evaluate the Company's proposal, as well as the findings and conclusion in the PIPES 2 Audit Report prepared by Continuum; the Company's performance under the PIPES 2 Plan; and any other relevant information that will inform the Commission's decision on the prudence of continuing this program. This is a similar and reasonable approach the Commission took in evaluating the PIPES 2 Plan, *i.e.*, examination of the Company's PIPES 1 performance and the PIPES 1 Management Audit Final Report prepared by The Liberty Consulting Group.²

The Commission has ruled on an extension of the PIPES 2 Plan, which is scheduled to end on February 28, 2025. No further determinations regarding the continuation of PIPES 2 are under review in Formal Case No. 1154; therefore, a further examination of the PIPES 2 Plan in Formal Case No. 1154, as OPC recommends in its Motion, is not reasonable and would unreasonably delay consideration of the PIPES 3 Plan.³ Policy considerations associated with the alignment of the PIPES program with the Company's public service obligations, as well as the District of Columbia's climate goals, have been raised in testimony and comments filed by the Company and other parties in Formal Case No. 1175 and are expected to be further litigated in that case which allows

¹ Formal Case No. 1154, Order No. 21982 at 5 (emphasis added). OPC's citation of this language in Order No. 21982 failed to include the Commission's reference to PIPES 3. See OPC Motion at 2.

² Formal Case No. 1154, Order No. 20671 (December 11, 2020).

³ See OPC Motion at 2. Furthermore, OPC provides no basis or substantiation for its false claim that the Company "continues failing in its obligation to reduce leaks as a part of its regular operations and maintenance." OPC Motion at 3. In fact, in the Order approving the PIPES 2 Plan, the Commission stated, "We also found persuasive that WGL's Grade 1 and 2 leaks reported to PHMSA had declined by 30% since 2019." Formal Case No. 1154, Order No. 21982 at 4-5.

for “robust stakeholder participation” as OPC is requesting in its Motion.⁴ The Commission should complete its examination of the PIPES 3 Plan, in Formal Case No. 1175, and render a decision in that ongoing proceeding.

To the extent OPC seeks to examine issues outside the scope of the Company’s request to continue to enhance the safety and reliability of its distribution system through the PIPES program, such as OPC’s suggestion of an evaluation of “a cohesive strategy and integrated plan” to address the District’s climate goals or an “evaluation process to be utilized for any project adopted to replace PROJECTpipes,” such issues have broader implications and should be raised in Formal Case No. 1167.⁵

For all the above-stated reasons, the Commission should deny OPC’s Motion and move forward with its examination of the Company’s PIPES 3 Plan, in Formal Case No. 1175.

Respectfully submitted,



CATHY THURSTON-SEIGNIOUS
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⁴ See OPC Motion at 3.

⁵ *Id.*

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 10th day of May 2024, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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