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June 27, 2024

VIA ELECTRONIC FILING

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

Re: **FORMAL CASE NO. 977**
[WASHINGTON GAS'S RESPONSE TO ORDER NO. 22002]

Dear Ms. Westbrook-Sedgwick:

Transmitted for filing is Washington Gas Light Company's ("Washington Gas" or the "Company") response to Order No. 22002.

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

Sincerely,



Meera Ahamed
Associate 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)

WASHINGTON GAS LIGHT COMPANY’S RESPONSE
TO ORDER NO. 22002

Washington Gas Light Company (“Washington Gas” or “Company”) hereby submits its responses to the directive in the Public Service Commission of the District of Columbia’s (“Commission”) Order No. 22002, issued on June 12, 2024, in the above-captioned proceeding (“Order No. 22002”).

BACKGROUND

On February 2, 2024, Washington Gas filed the Company’s Annual Report for calendar year 2023 for Natural Gas Quality of Service Standards (“NGQSS”) prescribed by Title 15 of the District of Columbia Municipal Regulations (“DCMR”).¹ The 2023 NGQSS Report included requests for waivers for some metrics with less than 100% NGQSS compliance. In Order No. 21994, the Commission noted that it does not believe a waiver of any penalty is warranted and directed the Company, within 15 days of the date of the Order, (i) to show cause why a penalty of \$120,000 should not be imposed for its failure to comply with certain provisions of the NGQSS;²

¹ See Order No. 21994 at 1, FN 4, granting the Company’s motion for leave to file the Annual NGQSS Report for 2023 out of time. The NGQSS are set forth in Order No. 20254, issued on November 13, 2019 – *RM37-2017-01 Natural Gas Quality of Service Standards and Reliability Performance*; and 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. 977”) Order No. 20254 (“Order No. 20254” or “RM37 Order”). This proceeding is referred to as “RM37.”

² Order No. 21994 at 1.

and (ii) to file a resiliency plan to prevent gasps or disruption in notification and reporting to the Commission.³ On May 31, 2024, Washington Gas filed a response to Order No. 21994, agreeing to pay the \$120,000 and providing its Resiliency Plan. In Order No. 22022, the Commission accepted Washington Gas’s Resiliency Plan and Revised Staffing Plan and directed the Company to file the implementation timeline for the Resiliency Plan withing 15 days of June 12, 2024.⁴ The timeline is provided in this filing.

IMPLEMENTATION TIMELINE FOR RESILIENCY PLAN

In its response to Order No. 21994, filed on May 31, 2024, Washington discussed its proposed Resiliency Plan to improve the performance, stability, scalability, and resiliency of the RM37 process/system for notification and reporting requirements, which the Commission, in Order No. 22002, accepted as filed.⁵

The Company is submitting the timeline below to comply with the Commission’s directive in Order No. 22002. Importantly, the Company was developing this timeline *prior* to the issuance of Order Nos. 22002 and 22004. However, in Order No. 22004, the Commission noted that “an open and transparent investigation into leak detection, management and reporting would be useful for both the Commission and parties to fully examine and understand WGL methodologies,”⁶ and that “[T]he Commission plans to discuss how reporting requirements may be adjusted in the future to make LIDAROC⁷ a more consistently reliable source of leak information.”⁸

³ *Id.*

⁴ Order No. 22002 at 3.

⁵ *Id.*

⁶ Order No. 22004, issued on June 12, 2024, at 6.

⁷ LIDAROC refers to Washington Gas’s Leak Identification Detection and Repair and Odor Complaint’s database.

⁸ *Id.* at 9.

As the Commission is aware, the Company's re-platforming efforts to enhance the processes for notification and reporting related to Formal Case No. 977⁹ are at the core of the Resiliency Plan. Therefore, Washington Gas plans to proceed with the implementation plan described below, and will, if needed, incorporate findings from the technical conferences directed by Order No. 22004,¹⁰ in future releases once new requirements are fully scoped. At this time, absent dates certain for the technical conferences, and uncertainty regarding either the scope of adjustments that may be needed for the re-platformed system, the information that may need to be incorporated into the LIDAROC reporting, or leak reporting and mapping requirements,¹¹ the Company cannot gauge the level of time and effort and that may be required to implement those new requirements or changes in future releases.

TIMELINE

The first release of the new RM37 platform is scheduled for implementation on June 29 and 30, 2024. A final decision on whether to proceed with the implementation on June 29 and 30 will be made on June 28, 2024. If the decision to "go-live" is approved, the expectation is that the new RM37 process/system will be fully activated starting Monday July 1, 2024. The project team will closely monitor the implementation and performance of the new solutions for two weeks thereafter. The backup date for implementation is July 6 and 7, 2004, with full activation targeted for Monday July 8, 2024. If for any reason implementation of the new platform needs to be further delayed, the Company will notify Commission Staff.

⁹ Formal Case No. 977.

¹⁰ Order No. 22004 at 8, 9.

¹¹ See Order No. 22004 at 9 (Paragraphs 20 and 21).

CONCLUSION

WHEREFORE, Washington Gas respectfully requests the Commission to accept the Company's timeline for implementation of its Resiliency Plan.

Respectfully submitted,



Counsel for Washington Gas

Karen M. Hardwick, General Counsel and Senior Vice President
John C. Dodge, Associate General Counsel and
Director, Regulatory Matters
Meera Ahamed, Counsel

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June 27, 2024

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 27th day of June 2024, I caused copies of the foregoing **Response** to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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