

GOVERNMENT OF THE DISTRICT OF COLUMBIA  
OFFICE OF THE ATTORNEY GENERAL



**BRIAN L. SCHWALB**  
**ATTORNEY GENERAL**

**Public Advocacy Division**  
**Housing and Environmental Justice Section**

**ELECTRONIC FILING**

September 3, 2024

Ms. Brinda Westbrook-Sedgwick  
Public Service Commission  
Of the District of Columbia Secretary  
1325 G Street, NW, Suite # 800  
Washington, DC 20005

**Re: Formal Case No. 1178 – In the Matter of the Application for Investigation  
into Washington Gas Light Company’s System Leak Protection Practices**

Dear Ms. Westbrook-Sedgwick:

On behalf of the Department of Energy and Environment, please find enclosed its  
Comments in Response to August 2, 2024 Public Notice. If you have any questions  
about this filing, please contact me.

Respectfully submitted,

BRIAN L. SCHWALB  
Attorney General

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cc: Service List

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

**IN THE MATTER OF:** )  
 )  
**The Petition for Investigation Into** )  
**Washington Gas Light Company’s** ) **Formal Case No. 1178**  
**System Leak Reduction Practices** )

**DEPARTMENT OF ENERGY AND ENVIRONMENT’S  
COMMENTS IN RESPONSE TO AUGUST 2, 2024 PUBLIC NOTICE**

Pursuant to the Public Service Commission of the District of Columbia’s (Commission) Public Notice issued on August 2, 2024, in the above-captioned proceeding, the Department of Energy and Environment (DOEE) provides the comments below.

**COMMENTS**

The Commission’s Public Notice invited interested persons to provide comments, relevant questions, concerns, and recommendations for best practices specific to the topic of “Washington Gas Light Company’s Protocols on Identification and Categorization of Grades 1, 2, and 3 Leaks.”<sup>1</sup> Further, the Commission indicated that it intends to hold a second Technical Conference in this proceeding that will address how leaks are prioritized for repair and how related expenditures are categorized as repairs or replacements.<sup>2</sup>

DOEE looks forward to participating in the technical conference and appreciates the opportunity to submit comments and questions in advance of the conference. However, DOEE is unable to submit substantive comments at this time because it had anticipated receiving

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<sup>1</sup> Formal Case No. 1178, *In the Matter of the Petition for Investigation into Washington Gas Light Company’s System Leak Reduction Practices*, para. 1 (rel. August 2, 2024).

<sup>2</sup> August 2, 2024, Public Notice, ¶¶ 2-3.

information from Washington Gas Light Company (WGL) on or before August 11, 2024 – per Order No. 22004<sup>3</sup> and the Commission’s Public Notice issued on July 11, 2024 – in response to the extensive list of questions DOEE posed in comments on the previous topic of WGL’s leak detection practices.<sup>4</sup> Those questions were designed to inform the instant comments. But, as of today, WGL has not responded to any of the questions DOEE posed in its prior comments.

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<sup>3</sup> F.C. 1178, at ¶18 (*rel.* June 12, 2024).

<sup>4</sup> F.C. 1178, DOEE’s Comments on Gas Leak Detection Practices in Response to the July 11, 2024 Public Notice, pgs. 5-8 (filed July 31, 2024).

## CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of September 2024, I caused true and correct copies of the enclosed Department of Energy and Environment's Comments on in Response to August 2, 2024 Public Notice to be emailed to the following:

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