PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

PUBLIC NOTICE

FORMAL CASE NO. 1179, IN THE MATTER OF THE INVESTIGATION INTO WASHINGTON GAS LIGHT COMPANY'S STRATEGICALLY TARGETED PIPE REPLACEMENT PLAN

- 1. The Public Service Commission of the District of Columbia ("Commission") gives Notice that on September 27, 2024, Washington Gas Light Company ("WGL" or "the Company") filed a revised PROJECT*pipes* replacement Application for approval entitled, "The District Strategic Accelerated Facility Enhancement Plan" ("District SAFE" or "Plan").
- 2. More than a decade ago, the Commission approved the first five (5) year phase of WGL's 40-year Revised Accelerated Pipe Replacement Plan ("PIPES 1").² The PIPES 1 plan included proposals for replacing aging leak-prone pipeline infrastructure with the highest risk and leak rates (*i.e.*, cast iron main lines and bare and unprotected steel mains) at an estimated cost of \$110 million.³ WGL filed its PIPES 2 plan on December 7, 2018, requesting approval for five years (*i.e.*, October 1, 2019, through December 31, 2024).⁴ The PIPES 2 plan included proposals for eight distribution replacement programs and five transmission replacement programs at an estimated cost of \$305.3 million.⁵ Instead of a five-year approval, the Commission approved a three-year Plan requiring WGL to address distribution system safety and reliability, including more restrictive performance

Formal Case No. 1179, In the Matter of the Investigation Into Washington Gas Light Company's Strategically Targeted Pipe Replacement Plan ("Formal Case No. 1179"), Washington Gas Light Company's Revised Application for Approval of The District Strategic Accelerated Facility Enhancement Plan, filed September 27, 2024 ("Plan").

Formal Case No. 1093, In the Matter of the Investigation Into the Reasonableness of Washington Gas Light Company's Existing Rates and Charges for Gas Service, and Formal Case No. 1115, Application of Washington Gas Light Company for Approval of a Revised Accelerated Pipe Replacement Program, Order No. 17431, ¶ 1, rel. March 31, 2014 ("Order No. 17431"). The Accelerated Pipes Replacement Plan was renamed and is currently known as PROJECTpipes.

Formal Case No. 1093, Washington Gas Light Company's Request for Approval of a Revised Accelerated Pipe Replacement Plan (Public Version and Confidential Version), at 2-3, and 6, filed August 15, 2013.

⁴ Formal Case No. 1154, Washington Gas Light Company's Application for Approval of PROJECTpipes 2 Plan ("Formal Case No. 1154"), filed December 7, 2018 ("WGL's PIPES 2 Plan").

WGL's PIPES 2 Plan at 5.

targets for replaced pipe and the District's climate goals.⁶ The Commission established a spending cap of \$150 million.⁷

- 3. WGL filed its PIPES 3 Application on December 22, 2022.⁸ On June 12, 2024, by Order No. 22003, the Commission rejected the PIPES 3 Application and directed WGL to "submit a restructured pipes plan that ensures the safe and reliable operation of the natural gas infrastructure to meet the energy needs of all District consumers in the District as well as aligns with the District's climate goals." By Order No. 22241, the Commission set forth a procedural schedule to adjudicate this matter. ¹⁰
- 4. The District SAFE Plan seeks authorization to undertake targeted replacement of certain vintage materials on its system and to recover the costs associated with the Plan through the previously approved surcharge mechanism for WGL's accelerated pipe program. According to WGL, from June 2014 through December 31, 2023, the Company has retired approximately 37.1 miles of main and remediated 8,403 services, including 7,457 services. WGL states that the District SAFE Plan will continue the Company's efforts to target the highest risk segments of the aging, aging leak-prone mains, and services while considering the environmental impacts in the District and ensuring the delivery of safe and reliable natural gas service. The purpose of the Plan is to provide a wholistic roadmap for the accelerated replacement activities required in the District, as well as the analysis supporting the planned safety-focused activities."
- 5. The District SAFE Plan covers March 1, 2025, through December 31, 2027. The Company proposes one overarching program comprised of projects selected based on the system risk-reduced-per-dollar spent, consistent with the Commission's

Formal Case No. 1154, Order No. 20671, ¶ 35-36, rel. December 11, 2020 ("Order No. 20671").

⁷ Formal Case No. 1154, Order No. 20671, rel. December 11, 2020.

Formal Case No. 1175, In the Matter of Washington Gas Light Company's Application for Approval of PROJECTpipes 3 Plan ("Formal Case No. 1175"). Washington Gas Light Company's Application for Approval of PROJECTpipes 3 Plan, filed December 22, 2022 ("PIPES 3 Application").

Formal Case No. 1154; Formal Case No. 1175, In the Matter of Washington Gas Light Company's Application for Approval of PROJECTpipes 3 Plan ("Formal Case No. 1175"); and Formal Case No. 1179, In the Matter of the Investigation Into Washington Gas Light Company's Strategically Targeted Pipe Replacement Plan ("Formal Case No. 1179"), Order No. 22003, June 12, 2024 ("Order No. 22003").

¹⁰ Formal Case No. 1179, Order No. 22241, ¶ 11, rel. July 26, 2024 ("Order No. 22241").

Plan at Exhibit WG (A)-1 at 5.

Plan at Exhibit WG (A)-1 at 5.

Plan at Exhibit WG(A) at 3 and 6.

Plan at Exhibit WG (A)-1 at 5-6.

¹⁵ Plan at Exhibit WG(A) -1 at 30-31.

Order, with replacement activity reporting focused on six (6) sub-categories of identified assets" for Distribution Main and Distribution Services. WGL indicates that through its District Plan, it intends to replace 12 miles of main and replace or remediate an estimated 2,612 service only, 966 service replacement with main, and 554 Service transfers in its distribution system over the three years of the plan, at a total estimated cost of \$215 million. In addition, as part of the Plan, the Company proposes a Customer Choice Pilot Program that will provide customers with advance notice of replacement work and allow them to opt-out if they intend to cease service with WGL. 18

- 6. The Commission invites interested persons to provide comments on the WGL's request for approval of the District SAFE Plan by **November 20, 2024**. Additionally, any person desiring to intervene in this proceeding shall file a petition to intervene with the Commission no later than **October 15, 2024**. All intervention petitions shall conform to the requirements of Commission Rule 106. Any objections to the intervention petitions shall be filed on or before **October 21, 2024**.
- 7. All comments and petitions for intervention should be addressed to Brinda Westbrook-Sedgwick, Commission Secretary, Public Service Commission of the District of Columbia, 1325 G Street, N.W., Suite 800, Washington, D.C. 20005, PSC-CommissionSecretary@dc.gov, and filed electronically on the Commission's website at https://edocket.dcpsc.org/public/public_comments or through the Commission's eDocket system.

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A TRUE COPY: BY DIRECTION OF THE COMMISSION

CHIEF CLERK: BRINDA WESTBROOK-SEDGWICK COMMISSION SECRETARY

Plan at Exhibit WG(A) - 1 at 28-30.

¹⁷ Plan at Exhibit WG (A) -1 at 30-31.

District SAFE Plan at Exhibit WG(A) 1 at 9; see also Exhibit WG (A)- 1 at 37.

¹⁹ 15 DCMR § 106 (1981).