



**Public Service Commission of the District of Columbia**  
**1325 G Street, NW - Suite 800 Washington, DC 20005**  
**(202) 626-5100**

**PUBLIC COMMENTS**

Date/Time Sent: Nov 20 2024, 5:54PM

To: Brinda Westbrook-Sedgwick, Commission Secretary

**Fullname:** Claire Mills  
**City, State, Zip:** Washington,DC,20009  
**Email Address:** claire@chesapeakeclimate.org  
**Company Name:** Not Available

**What is your position regarding the issues identified in the procedural schedule for this case?**

Oppose



**Public Service Commission of the District of Columbia**  
**1325 G Street, NW - Suite 800 Washington, DC 20005**  
**(202) 626-5100**

**PUBLIC COMMENTS**

**Public Comments:**

Dear Brinda Westbrook-Sedgwick, Commission Secretary, Public Service Commission of the District of Columbia, Please find attached a letter signed by our 22 organization in opposition to Washington Gas's District SAFE plan as proposed in docket 1179, to be filed in the docket.

Many thanks for your attention to this matter.

Best,

Claire Mills, Chesapeake Climate Action Network

November 20, 2024

Chair Emile C. Thompson

Commissioner Richard Beverly

Commissioner Ted Trabue

Public Service Commission of the District of Columbia

1325 G Street N.W., Suite 800

Washington, DC 20005

Dear Chair Thompson, Commissioner Beverly, and Commissioner Trabue:

The undersigned commend the DC Public Service Commission for doing the right thing by rejecting Washington Gas Light's irresponsible \$672 million gas pipeline replacement program, Project Pipes 3, in June of this year. We were heartened that the Commission recognized that this exorbitantly expensive and unnecessary program would have raised customer rates, put public health at risk, and contradicted the District's own climate goals.

Now, WGL has submitted a new pipe replacement application, which they have rebranded as District Safe. Despite the name change, District Safe is simply Project Pipes 3 dressed in a new outfit, seeking \$215 million in immediate spending on what will necessarily become stranded assets. Like PROJECTpipes, the proposal asks the Commission to approve WGL's business-as-usual approach and put District ratepayers on the hook for billions of dollars to prop up the broken gas system over the next 40 years. However, we know every aspect of WGL's business is polluting the air we breathe, endangering the health and safety of DC residents, and contributing to climate change.

A new report from PSE Healthy Energy found DC ranked in the top 20 cities nationwide for the number of emergency gas leaks, with firefighters responding to 944 leaks in 2018 alone. In 2022, neighborhood researchers found nearly 400 active methane gas leaks across all eight wards of DC. According to new data, "explosive" gas leaks increased by 40% from 2014 to 2022. Please do not believe WGL when they say replacement of their vintage material is the most cost-effective and safest path forward, especially using a predictive model rather than prioritizing existing leaks. We also have data that show that WGL's system is responsible for nearly a quarter (22%) of all greenhouse gas emissions in the District, polluting our homes and leaking climate-warming methane gas directly into the atmosphere. The District Department of Energy and Environment's latest emissions inventory from 2021 indicates that a staggering 71% of DC's emissions come from buildings—emissions only made possible by WGL supplying dirty fossil gas. Residents just experienced the hottest summer to date, and future generations cannot afford to remain tied to



**Public Service Commission of the District of Columbia**  
**1325 G Street, NW - Suite 800 Washington, DC 20005**  
**(202) 626-5100**

**PUBLIC COMMENTS**

methane gas.

Rather than throw hard-earned ratepayer money at a gas system that is dangerous, pollutes our air, raises energy bills, and perpetuates the climate crisis, the Commission must fulfill its statutory mandate to regulate in a manner that accounts for “effects on global climate change and the District’s public climate commitments” and direct a transition to net zero emission buildings in the District. Current DC law and public policy are premised on reducing emissions as quickly as possible, and the city is committed to achieving those reductions through electrification—a path supported by international and national scientific consensus. Transitioning DC’s communities toward modern all-electric homes can deliver cleaner air across the city. This will help align the District’s law and public policy with equitable approaches to redress a history of environmental racism and cumulative environmental impacts.

The Commission cannot undertake what is needed to meet the climate crisis—or comply with District law and public policy—by continuing merely to respond to utility filings like District Safe, which are all too often on the utility’s terms and in the interests of maximizing shareholder profit over the public interest. By enacting and overseeing a holistic planning process—as is being done in other jurisdictions across the nation, and as was recommended by the DC Council in its [February 8, 2024 letter](#)—the Commission can ensure we move toward a future when residents and their loved ones can breathe clean air and live in safe, healthy communities, regardless of their zip code.

The DC Public Service Commission must reject further spending on unnecessary pipe replacements, as it did this past June, and move forward with comprehensive and proactive thermal energy planning.

Sincerely,

Selah Goodson Bell, Center for Biological Diversity  
Mustafa Abdullah, Chesapeake Climate Action Network  
Ed Lazere, DC for Democracy  
Max Broad, DC Voters for Animals  
Vanessa Bertelli, Electrify DC  
Abby Shepard, Extinction Rebellion DC  
East Peterson-Trujillo, Green New Deal for DC  
Larry Martin, GRID 2.0  
Andie Wyatt, GRID Alternatives Mid-Atlantic  
Barbara Zia, League of Women Voters of DC  
Members, Metro DC DSA  
Jamoni Overby, Nature Forward  
Joy Reeves, The Rachel Carson Council  
Nathan Taft, SAFE Cities with Stand.earth  
Mark Rodeffer, Sierra Club DC Chapter  
Martha Camacho Rodriguez, Social Eco Education  
Marcie Burkland, Sunrise DC  
Jack Pavia, Sunrise Movement American University  
Deirdre Joy, Third Act DC  
Nathan Harrington, Ward 8 Woods Conservancy  
Anne Cauman, Ward Three Democratic Committee  
Matt Sehrsweeney, We Power DC



**Public Service Commission of the District of Columbia**  
**1325 G Street, NW - Suite 800 Washington, DC 20005**  
**(202) 626-5100**

**ACKNOWLEDGEMENT OF PUBLIC COMMENTS**

**Date:** Nov 21 2024, 9:23AM  
**Fullname:** Claire Mills  
**City, State, Zip:** Washington,DC,20009  
**Email Address:** claire@chesapeakeclimate.org  
**Company Name:** Not Available  
**Docket Number:** FC1179 - 1327

Thank you for your submission of comments regarding FC1179. Your comments have been docketed in the case and are available on our website, [www.dcpsc.org](http://www.dcpsc.org).

Regards,

Brinda Westbrook-Sedgwick  
Commission Secretary  
(202) 626-5150