

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Re: Testimony of Frank Bracht Regional Vice President of Operations, Miller Pipeline Regarding Formal Case No. 1179, *In the Matter of the Investigation into Washington Gas Light Company's Strategically Targeted Pipe Replacement Program*

My name is Frank Bracht, and I appreciate the opportunity to provide this testimony supporting District SAFE. I serve as Regional Vice President of Operations for Miller Pipeline, overseeing our operations throughout the Northeast and Mid-Atlantic regions. I've dedicated my entire 40-year career to this industry, starting as an inventory clerk in 1985 and working my way through various operational roles to my current leadership position.

This experience has given me a comprehensive understanding of the challenges and opportunities in maintaining critical infrastructure, particularly in urban environments like the District of Columbia. It has also made me acutely aware of the enormous positive value that District SAFE would provide for ratepayers and the community alike.

For decades, Miller Pipeline has been a trusted partner in maintaining and upgrading the District's natural gas infrastructure. We currently employ 61 dedicated professionals in DC, working daily to ensure the safety and reliability of the District's gas distribution system. Of these employees, 44 are minorities and/or women, reflecting our deep commitment to building a workforce that represents the communities we serve. Our team includes proud members of Local 11 Laborers and Local 77 Operators, skilled professionals who bring expertise and dedication to their work every day. Beyond direct employment, we maintain a strong commitment to diversity in our contracting, with approximately 36% of our revenue flowing to diverse contractors and suppliers.

The infrastructure we maintain in the District presents unique challenges that require specialized expertise and careful planning. Some of the gas mains we work with date back to the late 1800s, with the average age of mains dating to the mid-1900s. Service pipes, on average, date back to around 1965. This aging infrastructure requires constant attention and maintenance to ensure public safety. We currently spend significant resources to repair leaking infrastructure that would typically have been part of systematic replacement programs. The complexity of this work is compounded by the dense network of existing underground utilities in the District, which requires careful coordination and precision in our operations.

Operating in the District comes with distinct challenges that significantly impact our ability to work efficiently and cost-effectively. The District also restricts our work hours to 9:30 AM to 3:00 PM Monday through Friday, with additional restrictions around federal holidays. This limited window reduces our productive time to just 27.5 hours per week, less than 70% of a

standard work week. These constraints make it particularly challenging to recruit and retain skilled workers who can often find more consistent hours in neighboring jurisdictions.

The permitting process through the DC Department of Transportation exemplifies the unique complexities of working in the District. Each project requires three separate approvals: a construction permit, an occupancy permit, and site-specific traffic control plans. Unlike other jurisdictions, DC does not allow typical traffic plans, requiring custom solutions for each location. This process significantly extends project timelines and increases costs, as our teams must repeatedly pause work while awaiting new approvals.

These operational constraints are compounded by other challenges unique to the District: severe traffic congestion, truck road restrictions that lead to delays and citations, unannounced security shutdowns by agencies like the Secret Service and Department of Homeland Security, and the complexity of working around an abundance of existing underground utilities. The accuracy and timeliness of utility locates can also be problematic, adding another layer of complexity to our work and often resulting in costly delays.

The impact of these challenges is reflected in our revenue trends. In 2023, our DC operations generated \$20.2 million in revenue. However, we're currently trending toward \$13.5 million in 2024, primarily due to the lack of service and main replacement rate recoverable programs. This decline illustrates a broader challenge: the difficulty of maintaining a skilled workforce and efficient operations without long-term planning certainty.

Long-term planning is crucial for our business and workforce development. It enables us to invest in specialized equipment and training programs that improve efficiency and safety. When we have certainty about future work, we can justify investments in new technologies and techniques that ultimately reduce costs and minimize community disruption. Predictable workflows allow us to maintain consistent crews, reducing the high costs associated with employee turnover and ensuring that institutional knowledge about the District's unique infrastructure is preserved.

The current approach of short-term authorization creates significant operational inefficiencies. Each time we face uncertainty about program continuation, we must consider whether to maintain our workforce and equipment investments or begin scaling back. These cycles of uncertainty lead to higher fixed costs in supervision, equipment, and facilities, ultimately increasing the overall cost of infrastructure maintenance and replacement. The District SAFE program would make resources available and provide planning stability to correct these operational inefficiencies.

We understand and respect the District's climate goals and the broader transition in energy policy. However, as acknowledged by the District government itself, natural gas infrastructure will continue to be needed to support customers for decades to come. During this transition period, it's crucial that we maintain and upgrade existing infrastructure safely and efficiently. This requires a balanced approach that considers climate objectives alongside critical safety and reliability needs.

We urge the Commission to consider the importance of providing a stable, predictable framework for infrastructure maintenance and replacement. This would allow companies like Miller Pipeline to plan effectively, maintain a skilled workforce, and continue providing safe, reliable service to District residents while supporting the District's broader energy goals. A more predictable planning environment would enable us to operate more efficiently, ultimately reducing costs for ratepayers while maintaining the highest standards of safety and reliability.

Thank you for considering this testimony.

Sincerely,

Frank Bracht

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