

April 22, 2025

**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: FC 874 and FC 1167 - Washington Gas' [Motion for Extension of Time]**

Dear Ms. Westbrook-Sedgwick:

Pursuant to 15 DCMR §105.8, Washington Gas Light Company hereby submits this Motion for Extension of Time to file comments pursuant to Commission Order No. 22395. The Company respectfully requests that the Commission set June 27, 2025 as the date for all parties to file Initial Comments and July 23, 2025 for all parties to file Reply Comments.

Kindly direct any questions about this matter to the undersigned.

Sincerely,



John C. Dodge  
Assistant General Counsel  
and Director, Regulatory Matters

Per Certificate of Service

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

IN THE MATTER OF	)	
	)	
GAS ACQUISITION STRATEGIES OF	)	
DISTRICT OF COLUMBIA NATURAL	)	
GAS, A DIVISION OF WASHINGTON	)	Formal Case No. 874
GAS LIGHT COMPANY	)	
_____	)	

IN THE MATTER OF	)	
	)	
THE IMPLEMENTATION OF ELECTRIC	)	
AND NATURAL GAS CLIMATE CHANGE	)	Formal Case No. 1167
PROPOSALS	)	
_____	)	

**WASHINGTON GAS'S MOTION FOR EXTENSION OF TIME  
TO FILE COMMENTS**

Pursuant to the Public Service Commission of the District of Columbia's ("Commission") Rules of Practice and Procedure, 15 DCMR §105.8, Washington Gas Light Company ("Washington Gas" or the "Company") hereby submits this Motion for Extension of Time to file comments pursuant to Commission Order No. 22395. The Company respectfully requests that the Commission set June 27, 2025 as the date for all parties to file Initial Comments and July 23, 2025 as the date for all parties to file Reply Comments. In support of this Motion, Washington Gas states as follows:

**I. STANDARD FOR GRANTING EXTENSION OF TIME**

The standard for the Commission's review of motions for extension of time is whether the proponent of the motion provides good cause, or whether granting the motion

would be reasonable, would prejudice any party to the proceeding, would cause inordinate delay, or would create a more complete record for Commission action.<sup>1</sup>

## **II. BACKGROUND**

On March 27, 2025, the Commission issued Order No. 22395 which, *inter alia*, accepted, but did not adopt, the Gas Procurement Working Group's ("GPWG") Initial Report regarding the reporting and evaluating criteria necessary to measure the impact of Washington Gas' procurement activities on the District of Columbia's climate goals. In the same Order, the Commission issued a Notice of Inquiry ("NOI") in which it "requests input from stakeholders about recommended minimum filing requirements to track greenhouse gas (GHG)" emissions in WGL gas procurement reporting . . . ." with the initial comments due on May 5, 2025 and reply comments on June 4, 2025.<sup>2</sup> The NOI questions listed in Order No. 22395 are rather extensive (19 specific questions), and to a certain extent appear to overlap with portions of the 15-Year Climate Plan under development for filing on June 9, 2025. Certain of the questions posed in the NOI may also be addressed in the Climate Plan.

## **III. BASIS FOR RELIEF REQUESTED**

Washington Gas is working on its 15-Year Climate Plan due on June 9, 2025. Company personnel working on the 15-Year Climate Plan are also, in part, the same Company personnel necessary to complete the response to the NOI. Further, the 15-Year Climate Plan and the NOI comments are interrelated, as the responses to the NOI will likely include overlapping elements as the 15-Year Climate Plan. In addition, certain of

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<sup>1</sup> RM3-2014-01, *In the Matter of the Investigation into the Public Service Commission's Rules of Practice and Procedure*; and *Utility Consumer Bill of Rights*, Order No. 19089 (2017) (citations omitted).

<sup>2</sup> Order No. 22395, *Formal Case No. 874 and 1167*, March 27, 2025 at Paragraph 1.

the questions in the NOI may be addressed in the 15-Year Climate Plan requiring a second round of comments from all parties in the NOI. Hence, postponing comments to the NOI would serve to create administrative efficiency by enabling parties to address the issues in conjunction with the 15-Year Climate Plan.

Additionally, in Formal Case 1167, comments are due on April 28, 2025 addressing the use of an integrated distribution system planning framework, or similar framework, for gas planning proceedings in the District.<sup>3</sup> There are also reply comments due on April 26, 2025 in General Docket No. 2019-04-M in response to the BCA Model released by the Commission.<sup>4</sup>

As outlined above, there are a series of ongoing inquiries that involve the same personnel within Washington Gas. In order to more efficiently respond to the NOI, additional time is necessary. Granting the request will provide efficiency for all parties in responding to the NOI.

Further, given the overlap of the issues presented in both the NOI and the 15-Year Climate Plan an extension of time for all parties to respond to the NOI would align with the effort to address these matters in an administratively efficient manner. As such, this request is in the public interest and will not unduly prejudice any of the other parties in this or the other related matters. Additional time may very well serve to provide additional clarity and information necessary for the Commission to reach its final decision.

Finally, no party will be unduly prejudiced by the extension of time. All parties to these proceedings are seeking to ensure that the best possible result is achieved.

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<sup>3</sup> Order No. 22387, *Formal Case No. 1167* (Mar. 24, 2025).

<sup>4</sup> *GD2019-04-M, In the Matter of the Implementation of the 2019 Clean Energy DC Omnibus Act Compliance Requirements*, Notice at ¶ 5 (Feb. 25, 2025).

Additional time for all to comment will ensure all parties are able to put their respective best comments forward.

#### **IV. CONCURRENCE OF OTHER PARTIES**

Washington Gas has sought the position of the other parties in the proceeding regarding an extension of time to file Initial Comments and Reply Comments. The following have agreed to the extension request or have voiced no objection to Washington Gas to such an extension: Apartment and Office Building Association of Metropolitan Washington; Pepco; Office of the People's Counsel of the District of Columbia; DC Climate Action; General Services Administration; GRID2.0; and Sierra Club. No other party or person has responded to the Company's inquiry regarding the requested extension.

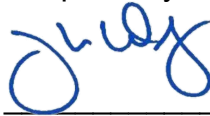
#### **V. CONCLUSION**

This request for extension of time will not unduly prejudice any participant in the proceeding. It will provide additional time for all parties to perfect their respective comments and will enable Washington Gas to devote full attention to this issue while also completing the 15-Year Climate Plan in a timely manner. For the above reasons, Washington Gas respectfully requests that all parties be granted until June 27, 2025 to file Initial Comments and until July 23, 2025 to file Reply Comments.<sup>5</sup>

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<sup>5</sup> The Company calculated the Reply Comment deadline by adding the same number of days—26—that separate the current Initial Comments and Reply Comments deadlines.

Respectfully submitted,



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JOHN C. DODGE

Associate Legal Counsel  
and Director, Regulatory Matters

WASHINGTON GAS LIGHT COMPANY  
1000 Maine Street, SW,  
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(202) 624-6722

Dated: April 22, 2025

## **CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on this 22<sup>nd</sup> day of April 2025, I caused copies of the foregoing **MOTION** to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

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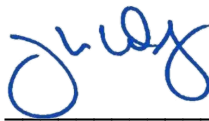
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