

**GOVERNMENT OF THE DISTRICT OF COLUMBIA
OFFICE OF THE ATTORNEY GENERAL**

**BRIAN L. SCHWALB
ATTORNEY GENERAL**



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

E-Docketed

May 28, 2025

PUBLIC VERSION

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. 1154 – In the Matter of the Application of Washington Gas Light Company for Approval of PROJECTpipes 2 Plan.

And

Formal Case No. 1179 – In the Matter of the Investigation Into Washington Gas Light Company's Strategically Targeted Pipe Replacement Program

Dear Ms. Westbrook-Sedgwick:

On behalf of the District of Columbia Government, I enclose for filing a public version of its Objections and Comments on Washington Gas Light Company's Updated Project List. A CONFIDENTIAL version of this document is being filed under separate cover. If you have any questions regarding this filing, please contact the undersigned.

Sincerely,

BRIAN L. SCHWALB
Attorney General

By: /s/ Brian R. Caldwell
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cc: Service List

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

IN THE MATTER OF:)	
)	
The Application of Washington Gas)	Formal Case No. 1154
Light Company for Approval of)	
a PROJECTpipes 2 Plan.)	

and

IN THE MATTER OF:)	
)	
The Investigation Into Washington)	Formal Case No. 1179
Gas Light Company’s Strategically)	
Targeted Pipe Replacement Program.)	

**DISTRICT OF COLUMBIA GOVERNMENT’S
COMMENTS ON WASHINGTON GAS LIGHT COMPANY’S
UPDATED PROJECT LIST**

Pursuant to Order No. 22401¹ of the Public Service Commission of the District of Columbia, the District of Columbia Government (District or DCG), through the Office of the Attorney General, respectfully submits the foregoing comments and objections to Washington Gas Light Company’s (WGL or the Company) updated list of proposed projects for accelerated PROJECTpipes 2 surcharge funding, covering the period from May 1, 2025, to December 31, 2025 (Updated Project List).

I. BACKGROUND

Much of the relevant history leading up to these comments on and objections to WGL’s Updated Project List is recounted in the “Background” section of the District’s Motion filed on

¹ Formal Case No. 1154, *In the Matter of the Application of Washington Gas Light Company for Approval of a Projectpipes 2 Plan* (FC 1154) at ¶ 9 (rel. April 10, 2025).

March 27, 2025, and will not be repeated here.² Despite WGL's opposition to the District's Motion seeking permission to issue discovery and file comments on WGL's Updated Project List, the Commission granted the relief sought by DCG and held the Company's Updated Project List in abeyance pending completion of the discovery and commenting process sought by the District in its Motion.³

The District compiled a set of 15 data requests (DRs) and shared them with the Company prior to filing them. Further, as directed by the Commission in its order, the District held a discovery conference with WGL on April 18, 2025. The discovery conference facilitated resolution of WGL's objections to one of DCG's data requests, but not DCG DR 2-11. DCG DR 2-11 essentially asked WGL to produce project lists corresponding to higher and lower budgets than the \$26 million that the Commission awarded the Company to cover the costs of accelerated pipe replacement activity through the end of 2025.⁴

In its substantive responses to DCG's data requests, WGL maintained its previously stated objections to DCG 2-11 on the basis that, *inter alia*, the information sought was irrelevant and speculative.⁵ But as explained by the District in its Motion to Compel a response to DCG DR 2-11, the point of seeking the requested information was to validate WGL's repeated assertions that its projects were selected based on a rational method of prioritization rooted in cost-effectiveness.⁶ Nevertheless, the Commission agreed with WGL and denied the District's Motion to Compel stating it would not require the Company to develop project lists based on

² FC 1154, District of Columbia Government's Motion for Leave to Issue Discovery and Comments on Washington Gas Light Company's Updated Project List, at pgs 2-5 (filed March 27, 2025).

³ FC 1154, Order No. 22401, at ¶ 8.

⁴ See DCG's Second Set of Data Requests (filed April 22, 2025)

⁵ FC 1154, WGL's Public Responses to DCG Data Request Set 2 (filed May 2, 2025).

⁶ FC 1154, DCG's Motion to Compel (filed May 7, 2025).

“speculative alternative funding level[s].”⁷ The District now timely files its comments on and objections to WGL’s Updated Project List.

II. INTRODUCTION

The Commission has made it clear that the PROJECT*pipes* program no longer serves the District’s needs. Order No. 22003 rejected WGL’s Pipes 3 Application and requested a new APRP that is more cost effective,⁸ more narrowly focused on the riskiest segments of leak prone pipe,⁹ and more aligned with the District’s climate policies.¹⁰ When the Commission most recently decided to further extend the FC 1179 procedural schedule and thus extend the Pipes 2 program for an additional 8 months while the District SAFE Plan remains under consideration, the Commission stated that the Pipes 2 extension was necessary to “maintain the continued safety and reliability of the gas distribution system.”¹¹ However, after evaluating the Updated Project List and discovery responses from WGL, DCG can only conclude that this extension period would be an expensive and ineffective use of ratepayer dollars that continues the same paradigm of the problematic PROJECT*pipes* program.

The Updated Project List on its own does not contain enough information for parties to assess whether or not the proposed projects are prudent investments, and if WGL is prioritizing the riskiest leak prone pipe segments on the system. DCG had to request missing data (pipe material and latest risk scores) that was required by Order Nos. 17431 and 22367 through discovery. The more data DCG obtained, however, the more it became clear that WGL’s APRP

⁷ FC 1154, Order No. 22421, at ¶ 12 (*rel.* May 21, 2025).

⁸ Order No. 22003, ¶ 50.

⁹ Order No. 22003, ¶ 49.

¹⁰ Order No. 22003, ¶ 48.

¹¹ Order No. 22367, ¶ 29.

project selection process in general, and WGL's Updated Project List in particular, *is not in the public interest.*

Moreover, an analysis conducted by the District's consultant in this matter, Synapse Energy Economics, Inc. (Synapse), found that the projects contained on WGL's Updated Project List are about as cost-effective as they would be, on average, if WGL were just selecting at random from the riskiest 30% of pipes on its system (close to the fraction that is leak-prone pipe)¹² -- despite WGL's refusal to produce information responsive to DCG DR 2-11 that would have otherwise elucidated the fact that WGL does not maintain a rational method of project prioritization according to cost-effectiveness.

Indeed, DCG found many alarming trends in the Updated Project List data that support this damning conclusion, which should prevent the Commission from approving any of the proposed Business Case Authorization's (BCA). One such trend is inexplicably ballooning costs. Taking just one example, the average service line replacements between 2014 and 2023 used to cost \$19,920,¹³ yet there are single service line replacements on the Updated Project List that have estimates that are almost 4 ½ times as high as the average past cost to replace service lines (as high as [REDACTED] [REDACTED]).¹⁴

In the following comments, DCG will outline several critical issues with (1) the process for reviewing and approving pipe replacement projects, (2) WGL's risk prioritization process, (3) non-compliance and red flags in the budget, including runaway costs associated with service line replacements, and (4) WGL's use of abandonment instead of replacement. Collectively, these

¹² See CONFIDENTIAL "Attachment A."

¹³ FC 1179, WGL Revised Application, Exhibit WG (A)-1 (District SAFE Plan 2024), Figures 12 and 13.

¹⁴ FC 1154, WGL CONFIDENTIAL Response to DCG DR 2-1.

issues illustrate WGL's non-compliance with Order Nos. 17431¹⁵ and 22367, and the Company's failure to demonstrate that it can cost-effectively prioritize risk and public safety. DCG objects to surcharge funding for all the proposed BCAs for the Pipes 2 extension and urges the Commission to reject the Updated Project List. WGL does need to further waste ratepayer funds on a surcharge that is failing to result in any significant risk reduction or bolster public safety because -- regardless -- the Company "is obligated to maintain the safety and reliability of the gas distribution system with or without surcharge recovery."¹⁶

III. PROCESS CONSTRAINTS AND CONCERNS

In extending the Pipes 2 program, the Commission continued the PROJECT*pipes* three-step process for approving APRP projects. The first step is the approval of a cap on the total eligible surcharge spend for a set length of time after reviewing an APRP application (in this instance, Order No. 22367 extended a previously approved APRP, Pipes 2, for 8 months with a \$34M spending cap). In the second step, WGL submits a Project List within 15 days. Parties then have a short time frame to file data requests and submit comments and/or objections (3 business days, and 15 business days respectively). The third and final step rolls the already built APRP projects into a base rate case proceeding.

This three-step process is structurally lopsided and insufficient for the purpose of reviewing major capital investments. The vast majority of time, resources, and evaluation is concentrated on the first step of this process, the review of the APRP application. But the APRP application contains limited information regarding the actual projects WGL proposes to pursue. The review timeline for the Project List, typically only a couple of weeks, is dwarfed by the time

¹⁵ FC 1115 (*rel.* March 31, 2014).

¹⁶ FC 1179, Order No. 22003, at ¶ 44 (*rel.* June 12, 2024).

and resources dedicated to reviewing APRP applications. For example, the FC 1179 proceeding for WGL's latest APRP application was initiated in June 2024 and is still ongoing, yet WGL's APRP application (District SAFE) does not have any project-level detail beyond an estimated annual budget. In other words, when parties are finally given details on how WGL intends to spend the approved surcharge, they only have a tiny window of time to analyze and evaluate the proposed projects or BCAs. The third and last step of reviewing APRP projects in a rate case provides a final, limited opportunity for evaluation. However, rate cases typically cover many topics and involve thousands of pages of materials, and thus these already complete APRP projects get buried in a docket with many competing issues.

DCG is grateful for the Commission's decision to grant its Motion for Leave to File Discovery and Comments, yet the discovery timeline was so short that DCG did not have time to ask follow-up questions and analyze the discovery data thoroughly. Further, WGL provided its initial responses to DCG's discovery questions in PDF filings. Many of DCG's discovery questions asked for additional data corresponding to all of the Updated Project List BCAs and WGL provided this information in unusable charts that spanned hundreds of pages. DCG asked WGL to provide the data in Excel spreadsheets, some of which took an additional week or more to acquire – cutting into an already truncated time for analysis. If the Commission intends for the review of the Project List to be a thorough and careful analysis of how WGL intends to spend millions of ratepayer dollars, then this current process is certainly not set up to facilitate that endeavor.

In addition to the limited review period, WGL does not represent the proposed BCAs in the Updated Project List in a straightforward manner. The Updated Project List does not make it clear what work WGL proposes to complete during the 8-month extension period from May 1,

2025, to December 31, 2025. It appears that the green section of the Updated Project List with the header “Estimated Extension Period Project Scope” includes all the BCAs from the entire 22-month extension of Pipes 2. Indeed, the sum of the “Extension Period Spend” column in this section is \$91,563,362, far more than the approved extension amount. DCG tried intuitive ways to sort the BCAs in a manner that would isolate the work that would take place during the 8-month extension period (i.e. selecting only the projects with a “Estimated Construction Start Date” after April 2025, or selecting only the projects with an “Estimated Paving Complete Date” after April 2025) but none of these methods generated a list that got close to the approved \$34M. The inability to decipher what specific work WGL is proposing to complete during the new 8-month extension period demonstrates a troubling lack of transparency.

The Updated Project List as originally filed also does not contain all the required data from Order Nos. 17431 and 22367. Order No. 17431 clearly states that one of the requirements for annual APRP projects is information on “Type of infrastructure being replaced (i.e. material type)”.¹⁷ There are at least 135 BCAs on the Updated Project List that do not have any data on the material type of the pipes that will be replaced. All of these BCAs include service line replacements, yet Order No. 17431 does not say service line replacements are exempt from the annual project list requirements. WGL eventually provided the data on material type in response to a DCG Data Request, yet DCG notes that even in that updated dataset, there are still 178 services that have unknown material.¹⁸

Order No. 22367 also states that in addition to the requirements of Order Nos. 21960 and 22317, “WGL shall also provide the latest risk score for each project” in the Updated Project

¹⁷ Order No. 17431, ¶70 (d).

¹⁸ FC 1154, WGL CONFIDENTIAL Response to DCG DR 2-5.

List.¹⁹ Only 83 of the total 227 BCAs on the Updated Project List include a JANA risk score. 27 BCAs do not possess any risk score whatsoever, and the remaining 117 BCAs have old risk calculations (i.e. Optimain scores or projected leaks per services scores). Commission staff asked WGL to produce some of the missing risk scores in PSC Data Request 20-1, and WGL responded with JANA scores for 6 additional BCAs.²⁰ Yet to obtain the JANA scores for all the Updated Project List BCAs, DCG had to ask for this required information in discovery, which WGL provided the response to on May 2, 2025.

WGL's failure to include the basic information required by the Commission with its project list provides sufficient reason alone to reject the Updated Project List. It is concerning that DCG was only able to obtain all the required annual project list information through discovery. WGL's failure to comply with its initial filing duties required the parties and Commission staff to spend its limited time issuing discovery rather than reviewing the Updated Project List. This in turn prejudiced the parties' ability to issue follow-up discovery based on information that should have been included with the initial filing and created a situation in which critical information would not be part of the record absent such discovery. Accelerated cost recovery is the exception, not the norm, in utility regulation. With such privileged forms of cost recovery must come an expectation for basic compliance with the Commission's orders.

Finally, The Commission has no stated metrics for how it intends to evaluate annual project lists. The only guidance offered by the Commission is its short list of minimum required information. It is unclear how the Commission has evaluated the annual project lists in the past, but in the following sections DCG has looked at the Updated Project List data through the lens of public safety and the Commission's most recently stated APRP objectives from Order No.

¹⁹ Order No. 22367, ¶31.

²⁰ FC 1154, WGL Response to Commission DR 20 (filed April 17, 2025).

22003: cost efficiency,²¹ narrow focus on the riskiest segments of leak prone pipe,²² and alignment with the District's climate policies.²³

IV. RISK PRIORITIZATION

As discussed above, the Updated Project List as originally filed does not contain enough information for DCG to evaluate how effectively the selected BCAs will reduce risk on the gas distribution system. DCG obtained data on risk scores, risk rankings, pipe material, and pipe age through discovery. Synapse Energy Economics, Inc., DCG's consultant, conducted an analysis on the mitigable risk and costs associated with the Updated Project List BCAs. The analysis focuses only on the newly introduced BCAs for the 8-month extension period and shows that WGL has not selected projects that are the most cost-effective available, in terms of risk reduction per dollar spent. The proposed projects would mitigate about 2.2 percent of all risk on WGL's system. If WGL were to spend the same amount of money on the most cost-effective risk reduction assets on its system, it could reduce risk by more than twice as much, as measured by the JANA risk value. The full confidential analysis is attached to these comments.

The results of this analysis are supported by additional concerning trends in the Updated Project List data. Based on the data of pipe age and material, it does not seem like WGL is prioritizing the oldest pipes or even the riskiest materials. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

²¹ Order No. 22003, ¶ 50.

²² Order No. 22003, ¶ 49.

²³ Order No. 22003, ¶ 48.

²⁴ FC 1154, WGL CONFIDENTIAL Response to DCG DR 2-5.

²⁵ Ibid.

[REDACTED] DCG was shocked to find that hundreds of pipes prioritized for replacement on the Updated Project List had been installed in the last 25 years.

Similarly, DCG discovered surprising data on pipe material in the Updated Project List. WGL has consistently insisted that the Company should receive more funding for accelerated pipe replacement so it can remove cast iron from the gas distribution system.²⁶ Cast iron removal is constantly cited as a priority for Pipeline and Hazardous Materials Safety Administration (PHMSA), and WGL insists that the Commission should be alarmed that there are still so many cast iron mains remaining on the distribution system.²⁷ Bare steel is perhaps the second most “risky” leak prone pipe material, and has generated the most recorded leaks on mains in WGL’s distribution system.²⁸ Yet in tallying up the totals for each material type of pipe segment on the Updated Project List, DCG found that [REDACTED]

[REDACTED] Less than 50% of all the targeted pipes are made of the two riskiest materials. Given WGL’s constant emphasis on the safety risks of cast iron and the need to remove all the cast iron mains as quickly as possible, it is alarmingly inconsistent that such a relatively minor amount of pipe material footage slated for replacement on the Updated Project List is cast iron. DCG would have expected cast iron pipes to be much more prioritized on Updated Project List—at least half of all the replaced pipe footage.

Finally, the Updated Project List leak data also raises concerns about how WGL is prioritizing pipe replacement. Only 127 out of the 227 total Updated Project List BCAs have

²⁶ FC 1179, WGL Revised Application, Exhibit WG (A)-1 (District SAFE Plan 2024), pg 18.

²⁷ FC 1179, WGL Revised Application, Exhibit WG (B) (Witness Quartermaster), pg 10.

²⁸ FC 1179, WGL Revised Application, Exhibit WG (A)-1 (District SAFE Plan 2024), pg 14.

experienced leaks. In other words, 100 BCAs on the project list have not yet leaked at all.²⁹ Considering that there have been at least 5,476 reported leaks (Grade 1 and Grade 2) between 2020 and 2023, DCG would have expected more BCAs to have a leak history.³⁰

V. BUDGET AND RUNAWAY COSTS

The budget or cost estimates of the Updated Project List continues the theme of providing scant information. WGL is required to provide Class 3 cost estimates for all the BCAs in the Pipes 2 annual project lists.³¹ While it appears that WGL provided this information in the Updated Project List, the Company's response to a Commission Staff Data Request casts doubt on the Company's compliance with this basic budget requirement:

Commission Staff DR-20-2: Reference Program 1 projects Business Case Analysis (BCA) 310571 and BCA310557. The estimated average cost per service is approximately three times that of other similar projects. Please provide a detailed explanation for the high costs of those two projects.

Washington Gas's Response: BCAs 310571 and 310557 have not completed final design and Class 3 estimates as of yet. The Company inadvertently left off the references to Notes 6 and 7 on these BCAs on the project list. The initial designs for both BCAs included replacing more services, which were later removed from the scope after they were found to be ineligible. The cost estimates had not yet been updated for that change. The Company will provide Class 3 estimates at the next update filing and completion of the Class 3 estimates.³²

WGL admits that it made errors on BCAs 310571 and 310557 and that it essentially failed to provide a Class 3 estimate. There are an additional 17 BCAs on the Project List that are tagged with Note 6, meaning that WGL acknowledges it has not provided a final Class 3

²⁹ FC 1154, WGL response to DCG DR 2-2.

³⁰ <https://dcp.sc.org/Utility-Information/Natural-Gas/Natural-Gas-Leaks.aspx>

³¹ Order No. 21960, ¶ 15.

³² FC 1154, WGL Response to Commission Staff's DR 20-2.

estimate for these projects. DCG can only wonder how many more errors are included in the Updated Project List that would add to the non-compliance list of BCAs without Class 3 estimates.

Class 3 estimates on their own do not provide much information to help parties evaluate the prudence or cost-effectiveness of proposed projects. DCG asked for unit cost breakdowns and calculations through discovery and received 392 pages of unorganized charts pasted together in a single PDF file.³³ While DCG was unable to conduct a thorough analysis with this information, there were still noticeable trends that support Synapse's findings on the lack of cost-effective risk reduction.

Commission Staff called attention to the two BCAs mentioned above because of the eye-popping costs of proposed service line replacements. [REDACTED]

[REDACTED]

[REDACTED] Yet there are many more BCAs with even more expensive service line replacements.

The average cost of a service line replacement between 2014 and 2023 was \$19,920.³⁵ Even that number the Commission found to be concerningly high. In Order No. 22003, the Commission directed WGL to improve the cost efficiency of its pipe replacement program. And yet despite that clear indication from the Commission regarding the need to rein in the cost of pipe replacements, DCG found many BCAs on the Updated Project List with individual service

³³ FC 1154, WGL Response to DCG DR-1.

³⁴ Ibid.

³⁵ FC 1179, WGL Revised Application, Exhibit WG (A)-1 (District SAFE Plan 2024), Figures 12 and 13.

line replacements that cost over \$50,000.³⁶ A non-exhaustive list of expensive service line replacements is in the chart below: [REDACTED]

[illegible]

³⁶ FC 1154, WGL CONFIDNEITAL Response to DCG DR 2-1.

WGL does not provide any further data or explanation for why some of these service line replacements have such astronomical costs. It would not be responsible for the Commission to approve such expensive replacements.

Another expensive eye-catching feature of WGL's Updated Project List are the "Allocations & Contingency" costs for each BCA. Based on WGL's response to DCG DR 2-1, it appears that WGL budgets [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

VI. ABANDONMENT

Another prominent and concerning feature of WGL's Updated Project List is the use of abandonment. Order No. 17431, which establishes the PROJECT*pipes* program, is explicit about which activities are eligible for the surcharge and it does not mention abandonment:

We think a project that qualifies for APRP funding must satisfy all of the following four qualifications:

- a) The project is started on or after June 1, 2014;
- b) Project assets are not included in WGL's rate base in its most recent rate case;
- c) The Project does not increase revenues by directly connecting the infrastructure replacement to new customers; and
- d) The Project is needed to reduce risk and enhance safety by *replacing* aging, corroded or leaking cast iron mains, bare and/or unprotected steel mains and services; and black plastic services in the distribution system.

Projects that do not satisfy all of these criteria must be funded through base rates with the recovery of the project costs established through a traditional rate case proceeding.³⁷

Despite this fact, at least 21 BCAs in the Updated Project List are marked as “ABDN ONLY”.

The Commission Staff also noted the unusual use of abandonment in their discovery questions:

Commission Staff DR 20-5: In total, 12.32 miles of main are scheduled for abandonment this year, while only 1.85 miles are planned for installation. Please explain the discrepancy between abandoned and installed mains, including whether this represents a change in strategy and how this aligns with long-term infrastructure planning and regulatory requirements.

Washington Gas’s Response: The Company’s project list includes more abandonment projects than in prior years. This is consistent with the Company’s approach of prioritizing projects based on the risk reduced per dollar spent metric and does not reflect a change in the Company’s approach.³⁸

WGL’s response to the Commission Staff DR 20-5 does nothing to explain why the Company is including miles of abandonment on its Updated Project List or why the Company thinks the proposed “Abandonment Only” project should be eligible for APRP surcharge.

The amount of proposed pipe abandonment also raises questions about how WGL is managing the gas distribution system. Are the many miles of pipe that WGL wants to abandon currently in use? If these pipes are not in use, how does their abandonment address risk or improve public safety? Further, how many more pipe segments on the distribution system are not in use and/or are ripe for abandonment? DCG is not opposed to abandonment as a means of addressing the risks of leak prone pipe as long as it is part of a Non-Pipe Alternative (NPA) framework in an integrated planning process. Absent these planning frameworks, the type of abandonment that WGL is proposing in the Updated Project List should be an operations and

³⁷ Order No. 17431, ¶ 69.

³⁸ FC 1154, WGL response to Commission Staff DR 20-5.

maintenance expense. Yet regardless of whether or not WGL is proposing abandonment as a NPA in its Updated Project List, it is clear that the Commission's orders establishing the existing PROJECT*pipes* program do not consider abandonment to be an eligible APRP activity.

VII. CONCLUSION

Not only does WGL's Updated Project List fail to meet the minimum annual project list requirements established by the Commission, but the data collected through Discovery also reveals that WGL is not selecting APRP projects in a way that prioritizes the riskiest pipes on its distribution system and reflects extreme costs far above what the Commission has approved in the past. An approval of the Updated Project List would not satisfy the Commission's concerns for public safety, but it would waste millions of ratepayer dollars on ineligible activities and inefficient projects. For all the reasons discussed above, DCG objects to the entire list of BCAs for the 8-month extension of Pipes 2 and urges the Commission to reject the Updated Project List in its entirety.

ATTACHMENT A

CONFIDENTIAL

CERTIFICATE OF SERVICE

I certify that on May 28, 2025, a copy of the District of Columbia Government's Public Objections and Comments on Washington Gas Light Company's Updated Project List was electronically delivered to the following parties:

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