



GOVERNMENT OF THE DISTRICT OF COLUMBIA
Dupont Circle Advisory Neighborhood Commission 2B

June 14, 2025

Chair Emilie Thompson
Public Service Commission
1325 G Street N.W., Suite 800
Washington, D.C. 20005
emilie.thompson@dc.gov

RE: Washington Gas' Application for the Proposed District SAFE Distribution Pipes Upgrade

Dear Chairman Thompson,

At its regular meeting on June 11, 2025, the Dupont Circle Advisory Neighborhood Commission ("ANC 2B" or "Commission") considered the above-referenced matter. With 6 of 9 Commissioners in attendance, a quorum at a duly-noticed public meeting, the Commission approved the following resolution by a vote of (6-0-0):

WHEREAS, PROJECT Pipes ("Pipes") is a 40 year plan, which received initial approval by the District of Columbia Public Service Commission ("PSC") in 2014, to replace all of Washington Gas Light's ("WGL") legacy service and distribution pipes in the District to eliminate leaks, prevent failures, and improve safety and reliability of their system.

WHEREAS, WGL is required by law to provide safe and reliable service.

WHEREAS, D.C. Law 24-176, *The Climate Commitment Amendment Act of 2022* ("CCAA") effective September 21, 2022, requires, among other things, that greenhouse gas emissions ("GHG") are reduced by no less than 60% of 2006 levels; interim target reductions between 2025 and 2045; and District government operations become carbo-neutral by 2020.

WHEREAS, the advent of the CCAA imposed new environmental requirements that Pipes would have to comply with.

WHEREAS, in December 2022, WGL filed an application for PROJECT Pipes Phase 3 ("Pipes3"), incorporating no compliance elements with the CCAA.

WHEREAS, in February 2024, the Council of The District of Columbia ("Council") advised PSC that Pipes3 is not compliant with the CCAA.

WHEREAS, on April 10, 2024, with 7 of 9 Commissioners in attendance at a duly noticed regular public meeting, ANC 2B voted 7-0-0 to support the Office of The People's Counsel ("OPC") opposition to WGL's Pipes3 application, citing the lack of CCAA compliance, and the

need to investigate increases in Class 1 leak occurrences, reducing the environmental impacts of leaks, and reevaluating near and long-term financial impacts on District ratepayers;.

WHEREAS, on June 12, 2024, the PSC voted to reject WGL's Pipes3 application.

WHEREAS, on September 27, 2024, WGL filed a revised Pipes3 replacement project Application for approval entitled "The District Strategic Accelerated Facility Enhancement Plan" ("DistrictSAFE" or "Plan").

WHEREAS, Washington Gas participated in a public discussion of DistrictSAFE at ANC 2B's April 2025 Transportation and Public Space Committee.

WHEREAS, while WGL insists that DistrictSAFE complies with CCAA, citing a greater than 90% reduction of GHG if they replaced all of the vintage components. However, they also claim to be unable to identify specific amounts of reductions of GHG.

WHEREAS, WGL has no incentive for reducing ratepayer costs for lost or unaccounted for gas. DC government leak surveys consistently obtains greater numbers of leaks than WGL reports. WGL's automated leak detection equipment has a sensitivity of 20ppm where the DC equipment can detect as little as 1ppm, resulting in a considerable undercount. WGL also consolidates some leaks into a single entry.

WHEREAS, DistrictSAFE lacks any details or chronology about what legacy equipment will be replaced. There is no transparency as to the selection and priority criteria for which pipes will be replaced. They indicated that they may aggregate several less critical replacements with critical ones in the name of efficiency to not have to return to the same area. The amount of pipe-miles replaced for the funding requested is considerably lower contrasted to Pipes3.

WHEREAS, ANC 2B specifically requested that WGL provide details about contingencies for replacement work as electrification shifts ratepayers away from gas service. WGL's response was to dismiss the concern that they could find themselves in a Doom Spiral where they must extract greater funds from the remaining ratepayers. They cited mailings to customers about switching to electric and receiving no responses indicating interest. The lack of concern about future market conditions is alarming.

WHEREAS, the information presented on DistrictSAFE paints a picture of doing considerably less work for more money that District ratepayers will be paying now, and in future iterations.

WHEREAS, there is no question the District absolutely must have the gas distribution system in good repair and safe. However, Pipe3 and WGL's statements do not provide confidence that approving this application will deliver demonstrable improvement within its lifetime. One estimate has the replacement *work continuing into the next century*.

WHEREAS, a better financial solution would be to require WGL draw upon its *rate base* first to provide priority replacement of vintage equipment currently leaking or at risk of doing so again in the near future. Approve interim rate base recoveries/replenishment based upon satisfying specific metrics. This would incentivize WGL to focus on prioritization, consolidating replacement efforts, and look forward to incorporating decommissioning unused segments and discouraging abandonment.

THEREFORE BE IT RESOLVED that ANC 2B supports the Office of The People's Counsel's opposition to Washington Gas Light's District SAFE proposal and respectfully requests the DC Public Service Commission dismiss the application for District SAFE.

BE IT FURTHER RESOLVED that ANC 2B asks the PSC require WGL in subsequent applications on this matter to provide plain-English explanations of the specifics of how they will comply with CCAA; provide accurate measurements and accounting of leaks; and that they specifically provide details for how they would proceed in scenarios where their ratepayer base declines by 10%, 25%, 33%, 50%.

Commissioner Rueckgauer (2B02@anc.dc.gov) is the Commission's representative in this matter.

ON BEHALF OF THE COMMISSION.

Sincerely,

A handwritten signature in black ink, appearing to read 'Zachary Adams', with a stylized, flowing script.

Zachary Adams
Chair