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June 16, 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: Formal Case Nos. 1154 and 1179
[Washington Gas]

Dear Ms. Westbrook-Sedgwick:

Transmitted for filing herewith please find Washington Gas Light Company's "Response in Opposition to the District of Columbia Government's Objections and Comments on Washington Gas Light Company's Updated Project List" in the above-captioned proceeding.

Please do not hesitate to contact me if you have questions regarding this matter.

Sincerely,

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

Cc: Per Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

IN THE MATTER OF APPLICATION OF WASHINGTON GAS LIGHT COMPANY FOR APPROVAL OF PROJECTPIPES 2 PLAN	)	Formal Case No. 1154
and		
IN THE MATTER OF THE INVESTIGATION INTO WASHINGTON GAS LIGHT COMPANY'S STRATEGICALLY TARGETED PIPE REPLACEMENT PLAN	)	Formal Case No. 1179

WASHINGTON GAS LIGHT COMPANY'S
RESPONSE IN OPPOSITION TO OBJECTIONS AND COMMENTS

Pursuant to 15 DCMR § 105.8, Washington Gas Light Company ("Washington Gas" or "Company") hereby submits this Response in Opposition to the District of Columbia Government's ("DCG") "Objections and Comments on Washington Gas Light Company's Updated Project List" in the above-captioned proceedings.

INTRODUCTION

Washington Gas Light Company ("Washington Gas" or "Company") submitted an Updated Project List under the PROJECTpipes 2 program, covering the period from May 1, 2025, to December 31, 2025, as part of the ongoing regulatory proceedings in Formal Case No. 1154 and Formal Case No. 1179. This submission was done in compliance with the District Public Service Commission's ("Commission") decision issued on February 19,

2025, in Order No. 22367 ("February 2025 Order") which extended the PROJECTpipes 2 program for an additional 8 months, with a capped surcharge recovery of $34 million, while the Commission continues to evaluate Washington Gas's proposed District SAFE Plan under Formal No. Case 1179.

On May 28, 2025, DCG filed its Objections and Comments on the Company's Updated Project List.[1] DCG has misleadingly styled its May 28, 2025, filing as Comments, but instead seeks full rejection of the Company's project list on grounds that are a mix of arguments reflecting DCG's failure to understand the materials it sought in discovery, its incorrect conclusions drawn from the materials provided, its misinterpretation of the Commission's prior orders, and its unfamiliarity with the realities of construction work done in the District. Further, and consistent with DCG's general approach to its appearances before the Commission, DCG relies on unverified statements, attempting to create the veneer of an expert opinion where no such expertise exists, to bolster what are otherwise uncredible conclusions asserted without any fact basis. The Commission should reject DCG's efforts to undermine the Commission's previously approved review processes and derail effective replacement of aged pipeline infrastructure.

The Commission should reject DCG's requests for relief. In support of its Response in Opposition, Washington Gas states as follows:

I. BACKGROUND RELEVANT TO THIS MOTION

1. By Order No. 21960, dated February 23, 2024, the Commission extended

[1] *Formal Case No. 1154*, *In the Matter of Application of Washington Gas Light Company for Approval of PROJECTpipes 2 Plan* ("Formal Case No. 1154"); *Formal Case No. 1179*, *In the Matter of the Investigation into Washington Gas Light Company's Strategically Targeted Pipe Replacement Program* ("Formal Case No. 1179"), DCG Objections and Comments to Washington Gas Light Company's Updated Project List (May 28, 2025).

the Company's PROJECT*pipes* Plan ("PIPES 2") through February 28, 2025 and directed Washington Gas to submit an annual Project List for this twelve (12)-month extension period (March 1, 2024, through February 28, 2025) within fifteen (15) days of the date of this Order, *i.e.*, by March 14, 2024.

2. On March 11, 2024, Washington Gas filed its Annual Project List for the 12-month extension period, noting that it had "met or exceeded the Commission's replacement targets included in Order No. 20671 for the first three (3) years of the PIPES 2 Program."

3. On July 2, 2024, Washington Gas filed its Revised Project List, consistent with the Public Service Commission of the District of Columbia's approval of Program 9, Advanced Leak Detection ("ALD").

4. On October 24, 2024, the Commission issued Order No. 22317, which extended PIPES 2 from February 28, 2025, to April 30, 2025. Order No. 22317 also directed Washington Gas to file an updated Project List by November 8, 2024 to address the modified extension period.

5. On November 8, 2024, pursuant to Order No. 22317, Washington Gas filed its Updated Project List.

6. On February 19, 2025, the Commission issued Order No. 22367, which further extended PIPES 2 through December 31, 2025. Order No. 22367 also directed the Company to file an updated PIPES 2 Project List for the extension period by March 6, 2025.

7. On March 6, 2025, Washington Gas filed its further updated PIPES 2 Project List for the extension period.

8. On March 27, 2025, DCG late-filed its Motion for Leave to Issue Discovery and Comments on Washington Gas Light Company's Updated Project List.[2]

9. By Order No. 22401 issued on April 10, 2025, the Commission granted DCG's Motion for Leave to Issue Discovery and Comments on the Company's Updated Annual Project List.[3]

10. On April 22, 2025, DCG served its Data Request Set No. 2 on Washington Gas.

11. On May 1, 2025, Washington Gas filed its response to DCG Data Request Set No. 2 and its objections to DCG 2-11(a)-(c), on the basis that the enumerated requests were irrelevant, speculative, assume facts not in evidence, present an undue burden and a requirement to perform a special study.

12. On May 6, 2025, DCG filed a Motion to Compel the Company's response to DCG 2-11(a)-(c).

13. On May 21, 2025, the Commission issued Order No. 22421, which denied DCG's Motion to Compel the Company's response to DCG 2-11(a)-(c).

14. On May 28, 2025 – more than 80 days after Washington Gas filed its project list in compliance with the Commission's Order – DCG filed its Objections and Comments on the Company's Updated Project List.[4]

II. RESPONSE TO DCG'S COMMENTS AND OBJECTIONS

DCG's Comments and Objections constitute yet another round of unfounded and ill-informed criticisms of Washington Gas's successful PIPES 2 program. Remarkably,

[2] *Formal Case No. 1154*, DCG Motion for Leave (Mar. 27, 2025).
[3] *Formal Case No. 1154*, Order No. 22401 (Apr. 10, 2025).
[4] *Formal Case No. 1154*, DCG Objections and Comments to Washington Gas Light Company's Updated Project List (May 28, 2025).

DCG claims that continuation of accelerated pipeline replacement in the District of vintage materials such as cast iron and bare steel does not serve the public interest.[5] DCG's assertion is squarely at odds with federal policy and laws that instruct local distribution companies like Washington Gas to enhance pipeline safety by replacing those very materials. Just as critically, DCG's arguments falsely claim that the Commission "has made it clear that the PROJECT*pipes* program no longer serves the District's needs,"[6] when the very project list they scrutinize was issued in compliance with the Commission's order extending PIPES 2 through December 31, 2025. DCG's arguments are not credible, and should be rejected.

A. DCG's Comments Ignore Commission Precedent

On a procedural basis, the Commission should reject DCG's efforts to circumvent its prior Orders. The review process for annual project list submissions was adopted by the Commission in Order No. 17789. The review process was generally affirmed in the PIPES 2 plan approval in Formal Case No. 1154, Order No. 20671,[7] where DCG was an active party.[8] Order No. 22317 did not modify the approach for project list submissions, nor did any interim orders since Order No. 20671. At a minimum, DCG's criticism of the review process here is untimely and inappropriate. To the extent DCG seeks to modify practices established in a prior Commission Order, it must file a complaint where it would bear the burden of proof to show that the Commission's practices are unjust and unreasonable. In the alternative, to the extent DCG believes that the project list process

[5] DCG Comments and Objections at 4.
[6] DCG Comments and Objections at 3.
[7] *Formal Case No. 1154*, Order No. 20671 at 102-106.
[8] *Id.* at 98-99. The Company notes that DCG did not raise concerns around the reporting requirements in the briefs filed in that proceeding, although other parties did.

should be modified in the future, it should have raised those concerns in Formal Case No. 1179. Its efforts here are simply an attempt to obtain another bite at the litigation apple, at a time and in a place where it is procedurally improper to do so. The Commission should reject DCG's efforts to circumvent its formal decision-making process.

More critically, DCG's arguments in its May 28 Comments are based on its erroneous belief that the Commission has rejected the PIPES 2 program structure, when that is plainly incorrect. The Commission extended PIPES 2 in its February 2025 Order, including the underlying program structure, risk prioritization methodology, and method for estimating costs and filing project lists. DCG's primary arguments – its unsupported belief that the prioritization process is not appropriate and that the project lists do not provide sufficient detail – fully ignores the Commission's previous decisions in Formal Case No. 1154, including its repeated acceptance of project lists with the same level of detail as that which was provided in the March 6 compliance filing.[9] No single sentence better captures how off base DCG is in its Comments than its criticism of the Company's project list because it "continues the same paradigm of the problematic PROJECT*pipes* program."[10] The Commission ordered the Company to continue accelerated pipe replacement work under PIPES 2, and the Company has done so through a project list that complies with the PIPES 2 Order. All of DCG's arguments are tainted by this fatal error in its understanding of the regulatory landscape, and thus DCG's Comments should be rejected.

[9] The Company notes that it had a mere fifteen (15) days in which to prepare and provide the project list submitted on March 6, 2025. Put in context with DCG filings, the Company was provided less time to identify and do initial design work on $34 million of projects than: (1) the time allowed for DCG to late-file its motion for discovery (submitted more than 20 days after the project list was submitted), (2) the time for DCG to late-file its comments (submitted more than 80 days – more than five times the amount of time provided to the Company to prepare its project list).

[10] DCG Comments and Objections at 3.

B. The Synapse Memorandum Is Replete With Errors And Is Fundamentally Unreliable

Beyond the criticism of the Synapse memorandum on a legal and procedural basis, which the Company raised previously in this Answer, the Company has reviewed the analysis provided by Synapse and has found significant issues with the methodology and conclusions. First, the Synapse analysis reviews 69 Business Case Authorizations ("BCAs"),[11] even though only 53 BCAs are new and not previously approved by the Commission. Of these 53, four (4) BCAs are driven by direct observations by field operations personnel (3) and work compelled by others (1), and yet Synapse fails to distinguish these four projects. Synapse's analysis of the new projects based on the JANA risk methodology should only have included 49 BCAs. Synapse's risk model criticisms are based on an inherently flawed data set, showing its lack of knowledge regarding the function of the program or the Commission's oversight of the program.

Second, Synapse uses two different JANA risk mitigation values in its analysis, what it labels as "Method 1" and "Method 2." However, Synapse fails to account for the differences between these two values. There are two key differences in the data provided in the Updated Project List (which was also provided in Formal Case No. 1154 DCG Data Request No. 2-8 ("DR 2-8")) and the data provided in response to Formal Case No. 1154 DCG Data Request No. 2-9 ("DR 2-9"). First, DR 2-8 was developed based on a previous JANA risk assessment, and this timing mismatch could have some influence on total risk metrics. DR 2-9 requested the JANA risk for all pipe *segments* being addressed in each Project List BCA. As described in Section C.i, *infra*, BCAs often impact segments that are

[11] A Business Case Authorization connotes the entirety of a construction project, from selection through close. Each BCA is assigned a unique numerical identifier.

not contributing to the risk prioritization but that must be addressed in order to cost effectively address the safety and service concerns associated with the project. In DR 2-9, the Company provided the most recent overall risk, as well as the remaining risk for each main and service facility identification ("FID")[12] under the proposed BCAs. Washington Gas also noted the fact that the data provided was using a recent JANA run, and therefore did not include risks for pipes that had been previously replaced. This list also includes pipes that either may be abandoned without replacement or transferred to a new main without being replaced.

Washington Gas designs projects annually based on the *bundle* risk analysis, however, there may be multiple years of risk-based projects included on a single project list due to the timing and size of the project, approved funding levels, etc. The data provided in DR 2-8 may reflect the JANA bundle risk based on the Company's initial project design, rather than the final design, because the design for the full scope of the project may not be complete when a project is proposed on a project list. During the design process, a project scope may be expanded to account for constructability, safety, integrity, etc. Where the scope of the project was altered during the design process, the JANA mitigatable risk would differ between DR 2-8 and DR 2-9. Therefore, only DR 2-9 reflects the Company's risk mitigation, and should have been the exclusive basis for the Synapse analysis. However, even if Synapse had used the correct data set, its methodology still had further major failings.

Synapse utilizes the total project cost from the Updated Project List in an effort to calculate the risk reduced per $10,000, which it plots on Figure 2.[13] The Synapse Analysis

[12] An FID identifies a facility (service pipe, service tee, main pipe, valve, etc.).
[13] Synapse Analysis at 3.

states that this figure shows the total risk associated with "a bucket" based on its calculation of risk reduction per $10,000. However, this graph is wholly incoherent. Washington Gas uses, and the Commission has approved, a risk reduced per $10,000 spent metric to target the most risk in the system for the level of funding authorized by the Commission.[14] This approach is consistent with PHMSA's requirements.[15] The risk reduced per dollar metric is, by definition, the measure of cost effectiveness within the PIPES program. In attempting to plot the risk reduction for each project per $10,000 by mitigable risk, Synapse uses data that has *already been adjusted* to evaluate the mitigable risk per $10,000 – creating an incoherent graphic. The total mitigable risk reduced by each project is a facet of the cost effectiveness calculation. A project that removes more risk for a lesser cost is the most effective, not a project that removes the same amount of risk for a high cost. Therefore, it is not surprising to see that there are some projects that remove an overall lower amount of risk, yet they have high cost-efficiency (risk reduced per $10,000) – these are the abandonment only projects that remove large lengths of main for a lower construction cost.[16]

To appropriately review the cost effectiveness of the risk-based projects, an analysis would need to be performed on how the risk reduced per dollar spent metric compared to the remaining JANA bundles in the system. The Company has provided the JANA priority ranking (i.e. where the project risk reduced per dollar spent aligns with the

[14] Order No. 20671, at 81.
[15] *Pipeline Risk Modeling Overview of Methods and Tools for Improved Implementation* PHMSA Report from February 1, 2020, available at https://www.phmsa.dot.gov/sites/phmsa.dot.gov/files/2020-03/Pipeline-Risk-Modeling-Technical-Information-Document-02-01-2020-Final.pdf, *cited in* Formal Case No. 1179, Exh. WG (D)-1, n. 1, Direct Testimony of Aaron C. Stuber (Sep. 27, 2024).
[16] Which, in further inconsistent fashion, DCG recommends that the highly cost effective abandonments not be included in the project list, without any real justification for that treatment and in full ignorance of the Commission's past allowance of such projects.

remainder of the JANA analysis in DR 2-8), which was not utilized or discussed in the Synapse Analysis or by DCG. The "rank" provided in DR 2-8 clearly demonstrates that the Company has prioritized the most cost-effective projects on this list. JANA ranks that are not listed on DR 2-8 may be missing for a variety of factors including: (1) the JANA bundle is being included in with a different project, (2) during the records research phase of design, the material was found to be non-eligible or previously replaced, or (3) the project exceeded the funding level thresholds determined by the Commission in Order No. 22367.[17]

Finally, and most egregiously, Synapse attempts to determine the cost effectiveness of the Company's proposed projects, identified by JANA *bundle* by utilizing the attachment provided in response to Formal Case No. 1179 DCG Data Request No. 7-21 ("DR 7-21"). DR 7-21 requested that the Company provide the risk and the cost provided by JANA on an asset-by-asset basis. Washington Gas provided the FID, the asset type (main or service), the material, length, installation year, overall risk, and estimated replacement cost. The Company's JANA analysis used to calculate the risk reduced per dollar metric is prioritized based on the JANA bundle, which is a set of assets that are grouped together based on a set of logical constraints. The cost or replacement for a JANA bundle is based on historical replacement costs using a variety of factors such as main size, service size, service length, replacement type, etc. The same cost cannot be done accurately at an FID level, as these segments of pipe can be partial segments of a larger service or pipe facility to be replaced.

[17] Order No. 22367, at 30.

Synapse should have questioned their approach using this method based on the estimated replacement cost provided in DR 7-21 alone. For example, there are FIDs that estimate the cost of replacement to be less than $100. The Company is barely able to get a permit in the District for this price, let alone complete work using a three-man crew. In fact, of the 162,488 service FIDs comprising the project list, 142,493 FIDs have a cost estimate less than the "average" service replacement cost of $19,920 that DCG quotes in their Objection. Synapse chose to utilize the $19,920 historic average service replacement cost data, despite the fact that 88% of the FIDs in DR 7-21 have a cost lower than this average. To be clear, the average estimated replacement cost for all service FIDs listed in the Company's response to DR 7-21 is approximately $16,000 – approximately 20% lower than the $19,920 historical average. Doing simple checks should have caused Synapse to question both the assumptions going into their analysis and the conclusions drawn from it. However, without these, the Synapse analysis on risk and cost-effectiveness of the Company's project list fails to pass muster.

DR 7-21 cannot be used to determine cost effectiveness as Synapse proposes, as it does not consider the multiple FIDs included in each bundle, nor does it have an accurate, reliable estimated cost by which to make a cost effectiveness calculation. Synapse incorrectly uses DR 7-21 to produce Figure 3, and in doing so creates a cost-effectiveness percentile for all proposed projects that is extremely inaccurate and provides no relevant data that could be used to analyze the project list. Synapse's reliance on its faulty analysis leads the memorandum to state that the Company "has not selected projects for the PROJECT*pipes* 2 extension list that are the most cost-effective available, in terms of risk reduction per dollar spent." This is untrue. As previously discussed, the

project ranking in terms of risk reduced per dollar was provided in DR 2-8 and was ignored by Synapse in favor of its ill-informed approach. DR 2-8 clearly demonstrates that the Company has selected projects with the highest risk reduced per $10,000.

Furthermore, in reliance on the Synapse analysis, DCG states that if the Company "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."[18] This is not accurate, as the estimated costs used by Synapse (i.e., by FID) are not accurate or indicative of actual construction costs. The Company's JANA model bundles FIDs into a "JANA Bundle" which are estimated based on service replacement costs, service transfer costs, or main replacement costs. These costs cannot be distributed to an individual FID level, as the FID cost would not consider the appropriate amount for contractor time, excavations, equipment needs, permits, etc., rather assuming a portion of costs that cannot be separated.

On its face, the Synapse analysis produces incoherent and unreliable results. The failure of Synapse to understand the data they were using, or to do even a cursory reality check on their inputs and assumptions, creates a fundamentally unreliable basis for all of DCG's conclusions and recommendations. As such, DCG's Comments should be rejected.

C. DCG's Comments Are Factually Unsound

Turning to the arguments raised by DCG with regard to the project list itself, DCG's Comments are replete with errors that reflect its fundamental lack of understanding of the pipe replacement activity that the Commission has overseen throughout the course of the

[18] DCG Objection at 9.

PIPES program, including the basic structure of work undertaken pursuant to PIPES 2. DCG relies on a memorandum from Asa Hopkins of Synapse Energy Economics Inc. – a consultant who has no experience or education in gas engineering and gas safety.[19]

Contrary to the statements made by DCG, Washington Gas submitted its annual project list following the process and procedures in Formal Case Nos. 1115[20] and 1154 which allows for ample information for the Commission to determine that the project list complies with the PIPES 2 requirements.

i. DCG's Criticism of the Project List Ignores The Data Provided and Reflects A Basic Ignorance Regarding Long-Standing Commission Practice

The project list submitted by Washington Gas on March 6, 2025, was identical in form and content to prior project lists submitted in PIPES 2, including the prior project lists covering other portions of 2025 (i.e., the project list submitted on March 14, 2024, covering January 1 to February 28, 2025, and the project list submitted on November 8, 2024, covering March 1 to April 30, 2025). Yet now, as part of its ongoing efforts to slow or derail critical pipeline safety work in the District, DCG argues that the Company's use of BCAs are not represented "in a straightforward manner" and that the Company has not provided enough information on the work to be completed in the project list.[21] DCG also criticizes the Company for not making clear what work is scheduled between May 1, 2025,

[19] *See, e.g.*, https://www.synapse-energy.com/sites/default/files/resume-hopkins.pdf. Mr. Hopkins' prior experience is exclusively within the energy efficiency and policy space. None of his prior education or experience presents any indicia of expertise in gas safety, gas engineering, or technical expertise in gas systems. Perhaps this is why the Synapse recommendations are entirely inconsistent with the Commission's prior finding that replacement of these materials and the use of this methodology is in the public interest and is necessary to ensure public safety, and why its recommendations, if adopted, would undermine methods widely understood to minimize and decrease safety risks presented by natural gas pipeline infrastructure.

[20] Formal Case No. 1115, *In the Matter of Washington Gas Light Company's Request for Approval of a Revised Accelerated Pipeline Replacement Program* ("Formal Case No. 1115"), (filed Dec. 7, 2018).

[21] DCG Comments and Objections at 6.

and December 31, 2025.[22]

This criticism ignores both the historic practice used in a decade's worth of project lists, practices affirmed through multiple audits before the Commission, and the very information contained in the project list itself. DCG's arguments are demonstrably incorrect. The Updated Project List identified every project proposed for replacement during the extension period, including the specific BCA, project description, ward, type of infrastructure being replaced, risk assessment and reason for replacement, as well as **construction start and completion dates**,[23] and class 3 project estimates[24] in accordance with Order Nos. 17431, 17789, and 20671. The information is thorough, providing both annual project scopes and extension list scopes for unit and cost information. DCG provides no real guidance on what amount of information would be enough information, and as the Company will show later, DCG's criticism is ultimately incoherent and irrelevant. However, with only 15 days to prepare the project list, the Company provided extensive information that has – for more than ten years – been considered a sufficient level of detail by this Commission. DCG's arguments are baseless.

Another area where DCG attempts to create an argument for non-compliance with Order No. 17431, and wherein DCG ignores the Commission's longstanding practice, is its criticism that the services are not separated by material. This ignores the fact that, as defined by the Company's programs, services replaced under the service only program may include both targeted services and affected associated services. For example, a

[22] Although DCG's argument should be rejected on the merits, as the Company did provide the exact information DCG claims should have been included, DCG's interpretation of the Commission's Order is also incorrect. The Commission ordered the Company to submit an update to the PIPES 2 extension. It did not order the Company to create an entirely new list of projects that were not related to or continued work reflected in the prior PIPES 2 extension lists previously submitted.
[23] Formal Case No. 1115, Order No. 17431, at 70.
[24] Formal Case No. 1115, Order No. 17789, at 19.

Program 5 service only replacement BCA may include services that are copper, as well as any branch services attached to an eligible copper service. Addressing the attached services improves the safety of the facilities and is more cost effective than doing a partial replacement, welding a joint, and redeploying crews at a later date to reopen the street, and is critical for continued service. The Company maintains the affected service material, size, length, and other operational details internally to create accurate cost estimates and construction plans, however, the affected services are ultimately not determinative of the need to do the project or the basis for the project's inclusion on the project list. Similarly, services replaced as part of a main project are listed only as affected services on the project list because they must either be transferred or replaced with the main replacement work in order to maintain service to the customer. Again, the individual affected service information is maintained by the Company for the purposes of estimating costs and designing the project. Contrary to DCG's argument, this practice does not contradict Order No. 17431, because the Company appropriately identifies the type of infrastructure targeted for replacement as part of the program. Further, this process is the exact same approach that has been used by the Company in prior project list filings that have been accepted by the Commission.

ii. DCG's Comments Regarding Risk Prioritization Are Incorrect

The Company select projects in accordance with the risk reduced per dollar metric, consistent with the Commission's approval in Order No. 20671.[25] The Company's Updated Project List includes projects driven by the retired Optimain model for projects started prior to the implementation of JANA, projects selected based on the current JANA

[25] Formal Case No. 1154, Order No. 20671, at 81.

model, projects done pursuant to Program 10 - Work Compelled by Others, and finally projects selected as a result of direct observations from field operations personnel. For the 53 new projects incorporated in the Company's Updated Project List, most were identified through the JANA model.

As the basis for its criticism, DCG utilizes the presence of 523 pipe segments (i.e., FIDs) installed in 2000 and later that were identified within the Company's response to Data Request No. 2-5, and concludes that Washington Gas's prioritization method is flawed. However, in the response itself, Washington Gas stated that "the FID list is composed of facilities within the project limits but does not necessitate full replacement of materials identified." DCG's analysis ignores this critical factor. The note is critical because the data set provided includes facilities associated with both main and service projects that impact other services that will not be replaced (i.e., affected services). If a plastic service is connected to an eligible main that is prioritized for replacement, or as a branch service attached to an eligible service, the Company will perform a service transfer to maintain gas service to the customer. This process does not involve a full service replacement. Rather, it involves a small cut out or an additional installation to connect the existing plastic service to the newly installed facility. Without this transfer, the customer would lose gas service. The Commission approved the inclusion of affected services in Order No. 20671 because this work is necessary to complete the replacement activity and restore service to customers.

Washington Gas reviewed the 523 FIDs identified by DCG. Of the 523 FIDs, 509 are services and explicitly listed "Service Changeover" under the design note in Column I – making the basis for inclusion of these services self-explanatory on the face of the

project list. Again, these transfers are necessary to maintain gas service to the customer and were explicitly approved for inclusion by the Commission under PIPES 2. The remaining 14 FIDs are mains that span 9 BCAs. The Company's justification for including each of these FIDs is provided in Appendix A. Even assuming DCG's assertion was correct – and it is not, as the Company has shown – the 523 FIDs identified by DCG make up less than 10% of the total FIDs provided in response to the data request. However, DCG attempts to extrapolate from this set of data, which it has incorrectly interpreted, that the entire risk analysis is flawed.

Turning to another source of risk ranking criticism raised by DCG, DCG argues that Washington Gas did not provide the latest risk score for each project as dictated by Order Nos. 21960 and 22317.[26] DCG is incorrect in its assertion. Washington Gas's March 6 project list included 227 individual projects. Of these 227 projects, only 53 of the BCAs had not been presented on a prior project list. Further, as part of this process, Washington Gas provided risk scores for six (6) Ahead Of Paving and Field Operations projects where it had inadvertently not included the risk score information. However, for the remaining projects, risk scores were provided on the Updated Project List for all 200 projects driven by the Company's risk model. Moreover, for the 53 new projects, a risk score was provided for each of those identified by JANA.

Finally, as noted, only 53 of the BCAs submitted on March 6, 2025, had previously not been presented on a prior project list. Therefore, DCG was only required to evaluate the prudency and prioritization of these additional 53 projects, as the prior 174 projects were already determined to be replacements that were consistent with the Commission's

[26] DCG Motion at 7.

criteria in PIPES 2 because they will enhance the safety and reliability of the gas system in the District, based on the Commission's prior approval of the project list.[27] These carryover projects only needed to be evaluated as reasonable within the annual scope of the program. Of the 53 new projects submitted for consideration on the extension list, one (1) project was driven by DDOT roadway construction, three (3) were identified for replacement by the Company's field operations personnel, and 49 were identified using the Company's JANA model and the risk reduced per dollar metric. DCG's claim that it did not have adequate risk prioritization information is not true.

iii. DCG's Cost Arguments Are Misguided

DCG makes three arguments related to the cost of the projects in the project list. The first is that the Company did not provide Class 3 estimates for some of the projects on the project list.[28] The second is that some of the projects have high costs associated with them. Finally, the third argument is that the project cost estimates include contingency costs. Each of these arguments should be rejected.

First, as to the lack of Class 3 estimates for certain projects, because of the procedural process (largely attributable to DCG's purposeful delays in Formal Case No. 1179), Washington Gas was given a mere 15 days to prepare its project list. In order to prepare project lists, the Company complies with the requirements established by the

[27] Formal Case No. 1154, Order No. 22317, at 8.

[28] A further argument raised by DCG is a general complaint that Class 3 estimates do not provide enough information and that the Company's data was too voluminous and unorganized. See DCG Comments, p. 12. The data provided included one class 3 estimate per page or two, easily determined by the table header that included the BCA number and BCA name highlighted in yellow. Each individual class 3 estimate included main cost estimates (if applicable) and service costs. The individual estimates include the cost of various pay items and the number of units estimated for each, such as the cubic footage of backfill, the cost of dump fees, the square footage of paving, the number of relights, the estimated permit costs, etc. The Class 3 estimate also includes estimates for allocations and overheads as well as a contingency factor. DCG's argument is unserious and reflects its lack of experience with complex engineering projects.

Commission in Order No. 20671.[29] To do so, Washington Gas runs its risk analysis annually to ensure that the most risk is removed from the system based on the most up to date considerations. Once the risk analysis is completed, projects are identified, and they must enter the design process and go through records research, preliminary design, design revisions, sequence of operations review, class 3 estimates, etc., before achieving a design final. This process takes weeks to months to perform correctly, depending on the size and complexity of the replacement, and it cannot begin until the Company has a program budget, as that delineates the scope of the projects that will be addressed. Therefore, depending on the amount of notice given in advance of the filing date, the Company is not always design complete when the project list is submitted. This is particularly true here, where the Company was tasked with a 15 day turnaround on no notice, because this project list was not produced on a normal schedule as part of an approved program. As such, and consistent with past practice,[30] the Company filed the information that was available and submitted informational updates to its project list when the projects became design final. It is the final design units and Class 3 estimates from the updates that are then used for the Company's semi-annual and annual reconciliation filings. The Company's process of submitting an initial project estimate prior to a final Class 3 estimate is not an issue of non-compliance, as stated by DCG,[31] as a Class 3 estimate is created prior to every design finalization and used to provide all variance remarks, as required by Order No. 18815. This process has been detailed and evaluated

[29] Order No. 20671, at 102-106.
[30] *See*, *e.g.*, Washington Gas's PIPES 2 Year 9 (CY 2023) Updated Annual Project List filed June 1, 2023.
[31] Beyond non-compliance, DCG asserts that the lack of Class 3 estimates on certain projects is an error, and posits that perhaps there are "more errors". *See* Comments at p. 11 and 12. Said succinctly, what DCG points out is not an error, and the remedy is for the Commission to establish greater advance notice of program funding and filing deadlines for this critical safety work to continue uninterrupted.

by the Commission and intervening parties in PROJECT*pipes*.[32]

Turning to its second argument, DCG asserts that some projects are very expensive. At a basic level, this is true. Some projects are expensive, and some projects cost more than the average – because that is mathematically how an average cost works. Further, the Company has been transparent regarding the rising cost of work in the District, presenting a unit cost technical conference,[33] as well as voluminous testimony in Formal Case No. 1179 on this topic. The Commission has recognized these impacts in Order No. 22003 stating that it recognizes the challenges and that, "permitting delays affects the Company's productivity and costs." DCG itself plays a causal factor in these increased costs. However, DCG's Comments highlighting the cost of certain projects in Table 2, ignores key context. To provide that context, the Company is submitting Appendix B, which provides comments and context to each of the projects identified by DCG. Appendix B shows that a common theme of these high-cost projects are onerous paving and crew requirements established by the District Department of Transportation. Even with the relatively high cost of the identified projects, undertaking these projects produces the greatest risk removal from the system, consistent with the methodology established in PIPES 2.

Finally, DCG criticizes the project costs on the basis that Washington Gas has included contingency costs. This criticism ignores that the AACE Cost Estimate Classification System states that for a Class 3 estimate, the allowed contingency can be up to 30%. This is a higher contingency than what Washington Gas uses for its Class 3

[32] Formal Case No. 1154, *Washington Gas's Updated PROJECTpipes Program Implementation Plan* (December 30 2021).
[33] Formal Case No. 1154, *Technical Conference Report on Lowering PROJECTpipes Unit Costs* (May 19, 2021).

estimates. Further, the use of a contingency factor is commonly used in construction practices to account for the many places where final project costs are likely to be impacted, including but not limited to price fluctuations in labor or materials, design changes based on conditions found in the field, and variations in the scope of work that must be completed. The District is a high variance environment, where the Company regularly encounters challenges in the field that cannot be known at the time the project is designed, and the failure to include contingency costs would result in project costs that are not reality-based. The project costs are developed based on industry standards and are consistent with Class 3 estimate development. DCG's argument has no merit.

iv. DCG's Arguments On Abandonment Ignore Prior Commission Precedent and Effective Policy

DCG opposes the inclusion of abandonment projects, arguing that such projects are not includable under PROJECT*pipes*. DCG is incorrect. The Company has performed twelve (12) abandonment only projects throughout PROJECT*pipes* that have been approved by the Commission and recovered through the surcharge. Abandonment only projects are a cost-effective method for removing high risk, eligible facilities, where doing so is feasible because it does not impact service to customers. This approach removes high-risk infrastructure preventing future leaks without the cost of pipe installation, which is the largest cost of a main replacement project. Under its historic approach to PROJECT*pipes*, while there are limited opportunities to abandon assets in the District without impacting service, the Commission has recognized that where it is possible to do so, these abandonments meet the criteria of PROJECT*pipes* by lowering the cost customers would otherwise pay to improve the safe operation of the system. Excluding the most cost-effective opportunity to improve safety would not produce just and

reasonable results for customers.

Fundamentally, DCG's position on abandonment in its Comments is in contravention to its alleged cost concerns and its more generally stated concern with stranded assets. Abandonment of assets that are not needed for service is the most cost-effective method for removing leak prone assets from the District. Doing so is consistent with the risk-reduced per dollar spent methodology. The failure to include abandonment projects in the project list would otherwise result in either (1) the continued operation of the at risk main, or (2) an overall higher cost to remedy the risk through replacement of the pipe. Sound public policy, and indeed policy that is consistent with DCG's claimed concerns in this and other proceedings, requires the inclusion of abandonment where it removes the risk of leak prone pipe in a cost-effective and expeditious manner without impacting service to existing customers.

D. DCG's Comments Reflect An Effort to Circumvent Their Failure to Seek Reconsideration Regarding Their Previously Denied Motion to Compel.

Finally, as part of its Comments, DCG chides Washington Gas for refusing to answer DCG Data Request No. 2-11, essentially ignoring Order No. 22421, in which the Commission denied DCG's Motion to Compel answers to that discovery request. In its denial, the Commission stated as follows:

> We find WGL's objections to DR 2-11 are reasonable. DCG's hypothetical questions set forth in DR 2-11 suggest that WGL maintains a prepared list of projects that can be promptly added or removed if the spending limits are adjusted; this assumption is not consistent with WGL's testimony on the process of project development, or the project selection process set out by the Commission for PROJECTpipes. As described above, WGL has consistently testified that projects are developed and analyzed annually based on multiple components including the risk score, cost-effectiveness, and work compelled by others such as DC PLUG, Advance of Paving (AOP) and other District projects, and may be modified significantly based upon available funding. The Commission recognizes that developing a new

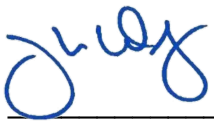
> project list at a speculative alternative funding level likely requires the Company to reconvene the project selection process in order to develop new projects, some of which may not exist in WGL's system at this time with sufficient detail to provide the requested information. As we have previously held, the Commission will not order the production of information or data that does not currently exist, or order that a special study be prepared. We deny DCG's Motion to Compel a response to Data Requests No. 2-11(a) – (c).

DCG did not seek reconsideration on the Commission's determination, but in its Comments DCG continues to chastise the Company for not modeling hypothetical programs that the Company has not requested and that the Commission has not approved. No amount of additional modeling would be relevant or probative because the Company provided data based on the Commission's established budget for the remaining 2025 project list (i.e., $34 million) and the methodology for developing the project list (i.e., PIPES 2).

III. CONCLUSION

For the reasons enumerated above, Washington Gas respectfully requests that the Commission deny DCG's request that the Commission disapprove the Company's Updated Project List.

Respectfully submitted,



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

WASHINGTON GAS LIGHT COMPANY

June 16, 2025

Appendix A: Justification for Including Main Pipe Installed in 2000 and Later

BCA No.	BCA Name	Project Comments
281515	DC APRP 10 - AOP - Florida Ave NE 2nd - H St - FAP STP 2015 (010) - Wards 5 & 6	Low-pressure plastic stubs are being abandoned because the services will be transferred to the proposed medium pressure main which is replacing cast iron main along the same street. Transferring the services to the medium pressure main enhances service reliability, allows the use of additional safety features, and limits the potential of third-party damage on the existing plastic main.
285137	DC APRP 10 - AOP - Rehabilitation C St NE - Ward 6	Abandonment of low-pressure plastic connected to cast iron main. All services are being transferred to an existing medium pressure main. There is no installation with this section of pipe.
297357	DC APRP 10 - AOP - S St NW Revitalization 4th to 7th - B004NNW1 - Ward 1	Plastic FID is included because the proposed project will tie the new proposed main into this existing plastic FID.
298472	DC APRP 10 - PLUG FEEDER 15009 - Ward 4	Short plastic repair exists between cast iron to be replaced. It is more cost efficient to abandon the small section of plastic and install a new main along the entire section of pipe abandonment.
301579	DC F.O. - APRP 4 - CUMBERLAND ST NW - J009NW - WARD 3	Short plastic repair exists between cast iron main. The cast iron and plastic are proposed for abandonment, with the services being transferred to an existing main on the same road. There is no installation with this section of pipe.
306601	DC APRP 4 - M ST NE - A003NE - JANA 53876 - Ward 6	Short plastic repair exists between cast iron main. The cast iron and plastic are proposed for abandonment, with the services being transferred to an existing main on the same road. There is no installation with this section of pipe.
307146	DC APRP 4 - SHEPHERD ST NW - D008NW - Ward 4	Short plastic repair exists between cast iron to be replaced. It is more cost efficient to abandon the small section of plastic and install a new main along the entire section of pipe abandonment.
309015	DC APRP 4 - 16th St NW - D006NW - WARD 1 - MNABD	This is an abandonment only project which includes a short plastic repair between cast iron main.
310278	DC APRP 4 - Porter St NW - H007NW - Ward 3 - ABDN ONLY	This is an abandonment only project which includes a short plastic repair between cast iron main.

Appendix B - AWGL Comments on Projects with relatively high service costs

BCA No.	No. of Services in DCG Table	Average Service Cost in DCG Table	Total Cost in DCG Table	WGL Comment
301143	15	$54,027	$810,000	The large costs associated with the project derive from a number of factors. 7 of the 15 services are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $244k. The pipe installation is estimated at $80k per the contract rate. Traffic control is estimated at $55k which assumes a service replacement requires 2 days and a changeover at 1 day. Additionally, this project includes large commercial service replacements at 1424 K St NW and 1401 H Street NW, which will need to be phased across multiple lanes of traffic on arterial roads and a 4" service at 1301 K Street NW which will require a double bag off and in-line tee. The Company's contingency of 20% is in-line with AACE Class 3 standards.
310545	19	$55,135	$1,047,572	The large costs associated with the project derive from a number of factors. 14 of the 19 services are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $280k. The pipe installation is estimated at $180k per the contract rate. Traffic control is estimated at $72k which assumes a service replacement requires 2 days and a changeover at 1 day. 16 of the 19 services will require a pit in the roadway which equates to an additional $63k in backfill and dump fees. The Company's contingency of 20% is in-line with AACE Class 3 standards.
308928	1	$60,401	$60,401	BCA No. 308928 is a Program 4 abandonment project. The project estimate submitted in response to data request no. 2 – 1 has been revised and includes a total project cost of $158,728 to abandon 407' of cast iron main with zero affected services. This equates to less than $2.1 million per mile of retirement.
306250	14	$60,779.06	$840,907	BCA No. 306250 has a total cost of $850,907. The large costs associated with the project derive from a number of factors. 12 of the 14

				services are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $169k. The pipe installation is estimated at $128k per the contract rate. Traffic control is estimated at $59k which assumes a service replacement requires 2 days and a changeover at 1 day. All 14 services will require a pit and cut in the roadway which equates to an additional $49k in backfill and dump fees. 12 of the 14 services have grade changes with 8 services having a conflicting wall, 2 have fences, a terraced yard, and one with extensive gardens. This adds an estimated T&M cost of $66k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
306282	21	$61,772.55	$1,297,224	This BCA has 19 service replacements, 1 abandonment, and 2 gas light replacements. The large costs associated with the project derive from several factors. 17 of the 19 service replacements are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $302k. The pipe installation is estimated at $172k per the contract rate. Traffic control is estimated at $85k which assumes a service replacement requires 2 days and an abandonment/ changeover at 1 day. All 19 service replacements and the abandonment will require a pit and cut in the roadway which equates to an additional $76k in backfill and dump fees. The Company's contingency of 20% is in-line with AACE Class 3 standards.
306183	23	$54,415.08	$1,251,547	This BCA has 22 service replacements and 1 abandonment. The large costs associated with the project derive from several factors. 17 of the 22 service replacements are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $213k. The pipe installation is estimated at $201k per the contract rate. Traffic control is estimated at $92k which assumes a service replacement requires 2 days and an abandonment at 1 day. All 22 service replacements will require a pit and cut in the roadway which equates to an additional $65k in backfill and dump fees. Additionally, 9 service replacements are estimated to require

				shoring at the service tee due to the depth of main on 37th Street NW and Observatory Pl NW, estimated at $21k. Further, 14 services have a conflicting retaining wall and another 3 have grade changes. This adds an estimated T&M cost of $89k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
306234	20	$59,767	$1,195,331	The large costs associated with the project derive from several factors. 19 of the 20 service replacements are expected to require excavation into the roadway resulting in total paving and restoration cost of $150k. The pipe installation is estimated at $185k per the contract rate. Traffic control is estimated at $86k which assumes a service replacement requires 2 days. 19 service replacements will require a pit and cut in the roadway which equates to an additional $68k in backfill and dump fees. Additionally, 9 service replacements are estimated to require shoring at the service tee due to the depth of main estimated at $23k. Further, 13 services are long side services, 2 services have grade changes with large hills and swing joints, one service is in conflict with a rock wall, and 2 in conflict with fences, and another 9 services will require landscaping. This adds an estimated T&M cost of $125k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
306164	13	$55,762	$724,910	The large costs associated with the project derive from several factors. 7 of the 13 service replacements are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $205k. The pipe installation is estimated at $121k per the contract rate. Traffic control is estimated at $44k which assumes a service replacement requires 2 days. All 13 service replacements will require a pit and cut in the roadway which equates to an additional $36k in backfill and dump fees. Additionally, 10 service replacements are estimated to require shoring at the service tee due to the depth of main estimated at $20k. Two services also require the crossing of 7 lanes, one lane at a time. Further, 6 services have conflicting fences, one has a conflicting retaining all, and two will

				require additional landscaping for an estimated T&M cost of $26k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
310561	14	$58,729	$822,206	This BCA has 12 service replacements and 2 abandonments. The large costs associated with the project derive from several factors. 6 of the 12 service replacements are expected to require curb to curb restoration per DDOT requirements, including a cul du sac, for a total paving and restoration cost of $232k. The pipe installation is estimated at $127k per the contract rate. Traffic control is estimated at $68k which assumes a service replacement requires 2 days and an abandonment at 1 day. 10 service replacements will require a pit and cut in the roadway which equates to an additional $56k in backfill and dump fees. The Company's contingency of 20% is in-line with AACE Class 3 standards.
309212	9	$68,797	$619,171	The large costs associated with the project derive from several factors. 4 of the 9 service replacements are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $177k. The pipe installation is estimated at $102k per the contract rate. Traffic control is estimated at $33k which assumes a service replacement requires 2 days and an abandonment at 1 day. 8 service replacements will require a pit and cut in the roadway which equates to an additional $47k in backfill and dump fees. Additionally, 5 services have a conflicting retaining wall. This adds an estimated T&M cost of $20k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
309189	20	$54,871	$1,097,427	The large costs associated with the project derive from several factors. 12 of the 20 service replacements are expected to require curb to curb restoration per DDOT requirements for a total paving and restoration cost of $291k. The pipe installation is estimated at $195k per the contract rate. Traffic control is estimated at $68k which assumes a service replacement requires 2 days and an abandonment at 1 day. 19 service replacements will require a pit and cut in the roadway which equates to an additional $98k in backfill and dump fees.

				Additionally, 2 services have front porches in conflict, 5 services are in conflict with a wall, 10 services have grade changes, 2 have fences, 2 will require landscaping, and one has a double terrace. This adds an estimated T&M cost of $22k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
309188	14	$61,725	$864,156	This BCA has 13 service replacements and 2 service transfer. The large costs associated with the project derive from several factors. 3 of the 13 service replacements are expected to require significant parking lot restoration for a total paving and restoration cost of $275k. The pipe installation is estimated at $117k per the contract rate. Traffic control is estimated at $51k which assumes a service replacement requires 2 days and a transfer at 1 day. 10 service replacements will require a pit and cut in the roadway which equates to an additional $56k in backfill and dump fees. The Company's contingency of 20% is in-line with AACE Class 3 standards.
307463	1	$73,843	$73,843	These two project estimates are only two of three phases of this project. BCA No. 397463 is a Program 10 main and service project with a total cost estimate of $1,467,743. This project estimates a total main abandonment of 3,846 feet of main. The total project equates to approximately $2.0 million per mile of replacement.
307463	2	$62,854	$125,708	
307207	1	$241,186	$241,186	The Class 3 estimate for this BCA was updated at the end of April after the Company's response to the data request. BCA No. 307207 is a program 3 main abandonment BCA, including one service abandonment with a total estimated cost of $165,537. This project estimates a total main abandonment of 163 feet of main. This equates to approximately $5.4 million per mile of abandonment.
310537	17	$55,158	$937,686	This BCA has 15 service replacements, 1 abandonment and 1 gas light. The large costs associated with the project derive from several factors. 6 of the 15 service replacements are expected to require curb to curb restoration for a total paving and restoration cost of $134k. The pipe installation is estimated at $172k per the contract rate. Traffic control is estimated at $60k which assumes a service replacement

				requires 2 days and an abandonment at 1 day. 8 service replacements will require a pit and cut in the roadway which equates to an additional $77k in backfill and dump fees. Additionally, 7 services have grade changes, 1 has a security wall, 1 service will require landscaping, 3 have conflicts with fences, 2 service replacements have a porch, and one is under a brick walkway. This adds an estimated T&M cost of $44k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
306220	13	$58,797	$764,364	The large costs associated with the project derive from several factors. 10 of the 13 service replacements extend into the roadway, estimating a total paving and restoration cost of $85k. The pipe installation is estimated at $124k per the contract rate. Traffic control is estimated at $65k which assumes a service replacement requires 2 days and a transfer at 1 day. 10 service replacements will require a pit and cut in the roadway which equates to an additional $63k in backfill and dump fees. Additionally, 7 services will require shoring at the main for an estimated cost of $16k. 8 services have significant grade changes, 1 has a retaining wall, 1 service will require landscaping, and 1 service replacement will require a detour to perform the work. This adds an estimated T&M cost of $88k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
309205	14	$56,191.28	$786,678	This project was revised and updated in June 2025. The revised project estimates replacing 4 services for a total estimated cost of $373,765. 3 of the 4 service replacements extend into the roadway, with an estimated total paving and restoration cost of $168k. The pipe installation is estimated at $40k per the contract rate. Traffic control is estimated at $18k which assumes a service replacement requires 2 days. The Company's contingency of 20% is in-line with AACE Class 3 standards.
309045	1	$67,430	$67,430	BCA No. 309045 is a program 3 main abandonment BCA, including one service abandonment with a total estimated cost of $314,310. This project estimates a total main abandonment of 1,304 feet of main. This

				equates to approximately $1.3 million per mile of abandonment.
309015	1	$87,325	$87,325	BCA No. 309015 is a program 4 main abandonment BCA, including one service abandonment with a total estimated cost of $391,083. This project estimates a total main abandonment of 1,091 feet of main. This equates to approximately $1.9 million per mile of abandonment.
169482	7	$56,189.51	$393,327	The large costs associated with the project derive from several factors. 6 of the 7 service replacements extend into the roadway, with an estimated total cost of paving and restoration cost of $106k. The pipe installation is estimated at $37k per the contract rate. Traffic control is estimated at $65k which assumes a service replacement requires 2 days and a transfer at 1 day. Additionally, all 7 service replacements are expected to require shoring estimated at $16k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
303981	11	$51,356.94	$564,926	The large costs associated with the project derive from several factors. 7 of the 11 service replacements are expected to require extensive restoration for a total paving and restoration cost of $132k. The pipe installation is estimated at $58k per the contract rate. Traffic control is estimated at $42k which assumes a service replacement requires 2 days. All service replacements will require a pit and cut in the roadway which equates to an additional $33k in backfill and dump fees. Additionally, 3 services have a retaining wall in conflict, 5 have grade changes, and one conflicts with a concrete patio. This adds an estimated T&M cost of $29k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
304040	14	$60,875.16	$852,252	This BCA has 13 service replacements and 1 service abandonment. The large costs associated with the project derive from several factors. 10 of the 13 service replacements are expected to require extensive restoration for a total paving and restoration cost of $231k. The pipe installation is estimated at $73k per the contract rate. Traffic control is estimated at $53k which assumes a service replacement

				requires 2 days and an abandonment requires 1 day. 9 service replacements will require a pit and cut in the roadway which equates to an additional $44k in backfill and dump fees. Additionally, 1 service is in conflict with brick pavers and 6 services cross heavy traffic roads with multiple travel lanes. This adds an estimated T&M cost of $69k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
303982	11	$54,798.05	$602,779	The large costs associated with the project derive from several factors. 7 of the 11 service replacements are expected to require extensive restoration for a total paving and restoration cost of $232k. The pipe installation is estimated at $127k per the contract rate. Traffic control is estimated at $68k which assumes a service replacement requires 2 days. 10 service replacements will require a pit and cut in the roadway which equates to an additional $33k in backfill and dump fees. Additionally, 1 service has a retaining wall in conflict, 5 have grade changes, one conflicts with a concrete driveway, and 4 require additional landscaping. This adds an estimated T&M cost of $59k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
303994	16	$56,300.78	$900,812	The large costs associated with the project derive from several factors. 8 of the 16 service replacements are expected to require extensive repaving for a total paving and restoration cost of $235k. The pipe installation is estimated at $94k per the contract rate. Traffic control is estimated at $56k which assumes a service replacement requires 2 days. 15 service replacements will require a pit and cut in the roadway which equates to an additional $63k in backfill and dump fees. Additionally, 5 services have a retaining wall in conflict, 8 have grade changes, one conflicts with brick pavers, and 2 conflict with a fire hydrant. This adds an estimated T&M cost of $29k. The Company's contingency of 20% is in-line with AACE Class 3 standards.
304028	9	$55,592.18	$500,330	The large costs associated with the project derive from several factors. All 9 service replacements are expected to require extensive restoration for a total paving and

				restoration cost of $124k. The pipe installation is estimated at $47k per the contract rate. Traffic control is estimated at $38k which assumes a service replacement requires 2 days. All service replacements will require a pit and cut in the roadway which equates to an additional $21k in backfill and dump fees. Additionally, 8 services require shoring estimated at $15k. 2 services have a retaining wall in conflict, 2 have grade changes, 2 have conflicts with fences, and 2 will require additional landscaping. This adds an estimated T&M cost of $37k. The Company's contingency of 20% is in-line with AACE Class 3 standards.

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 16th day of June 2025, I caused copies of the foregoing document to be hand-delivered, mailed postage prepaid, or electronically delivered to the following:

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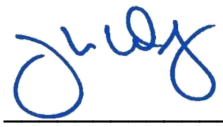

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