



Comments
of
Mike Litt, PIRG

For the Public Service Commission of the District of Columbia (DCPSC)
Community Hearing
In the Matter of the Investigation into Washington Gas Light Company's Strategically Targeted
Pipe Replacement Plan - Formal Case No. 1179

17 June 2025

Chairman Thompson and Commissioners Beverly and Trabue,

Thank you for the opportunity to testify at today's hearing on Washington Gas' proposed pipe replacement plan.

My name is Mike Litt. I live in Ward 6 and am the Consumer Campaign Director for the Public Interest Research Group (PIRG), a non-profit consumer advocacy group that advances solutions to problems affecting our health, safety, and well-being.

There are two overarching points I'll be making:

1. Washington Gas continues to default to full pipe replacement rather than seriously considering more cost-effective alternatives.
2. It has not provided sufficient information to evaluate how effectively it is addressing risk, including much of what the Commission requested.

Costly full pipe replacement

Because many District residents still rely on gas for home heating and will continue to for some time, Washington Gas has a responsibility to make prudent investments to maintain a safe system for its customers, workers, and District residents and visitors. This means some aging pipes will need to be replaced during the transition to safer, cleaner energy. But, given that more cost effective alternatives exist, full replacement should not and cannot be the only strategy Washington Gas employs to address the risks of old iron pipes in its system. However, in [its application](#), Washington Gas continues to claim—without adequate analysis of alternatives—that full pipe replacement is the only way to address risks from old pipes.

Last year, this Commission [ordered](#) Washington Gas to submit a new, short-term plan that redefines a “new normal” of “electrification and targeted replacement as opposed to the complete replacement of over 400 miles of aging, high risk pipelines.”

Instead, the company’s new proposal—District SAFE—is largely a continuation of the *old normal*. Washington Gas still projects replacing 477 miles of mains and 24,526 service lines by 2045 and beyond.

In its rebuttal, Washington Gas has failed to sufficiently [explain](#) why its three-year plan doesn’t reflect how electrification could change future infrastructure needs. It also dismisses—with little evidence—alternatives to full pipe replacement, such as advanced repair and [pipe-lining](#) technologies that could mitigate risk at lower cost while we transition to clean energy.¹

While the District SAFE proposal does not explicitly state a per-mile cost, it [estimates \\$129 million](#) to replace 12.4 miles of main pipe. That works out to roughly \$10.4 million per mile over the three year period. With hundreds of miles of pipes remaining, we’re concerned this foreshadows escalating costs as Washington Gas seeks to continue a program previously estimated to cost [billions](#).

Insufficient information for evaluating risk management

The company has not submitted specific project proposals—only stated that it will identify annual project lists over the next three years. Without a shift in approach, these projects are unlikely to reflect the most cost-effective ways to mitigate risk. That includes the risk of saddling Washingtonians with unnecessary costs for new pipes that will drive up our gas bills and may soon be obsolete as more buildings electrify to meet the District’s climate laws.

Washington Gas also has not provided the “detailed analysis of the need to replace the identified high-risk pipes” required by last year’s order.

Further, its recent Updated Project List for the extended PROJECTpipes 2 plan raises questions about how cost-effective and risk-reducing its District SAFE projects will be. Just three weeks ago, Attorney General Brian Schwab, on behalf of the DC Government, [submitted](#) findings that:

“...WGL has not selected projects that are the most cost-effective available, in terms of risk reduction per dollar spent.”

And:

¹ The Department of Energy and Environment commissioned [a report](#) in December 2022, which found that “the cost of pipeline replacement is on average 25 times the cost of pipeline repair.”

“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... DCG was shocked to find that hundreds of pipes prioritized for replacement... had been installed in the last 25 years... Less than 50% of all the targeted pipes are made of the two riskiest materials.”

Recommendations

For all these reasons, we urge the Commission to reject District SAFE in its current form and require Washington Gas to show that it fairly and reasonably considered non-pipe alternatives and targeted repair.

To achieve a truly targeted approach, it's critical to have a rigorous and transparent process for assessing risk, mitigation options, and benefit-cost ratios that effectively compare strategies.

To that end, we urge the Commission to require Washington Gas to provide:

- An opportunity for the Commission and stakeholders to evaluate its risk ranking methodology, with full transparency;
- A **risk ranking** of *all* pipes it wants to replace over the coming decades, not just those within District SAFE;
- The **risk reduced per dollar spent** for each;
- And a comparison to the **costs and risk reduction of repair and other non-pipe alternatives**.

This information is essential to fully evaluate the District SAFE proposal. I urge the Commission not to approve WGL's proposal, or approve any further extensions, until these fundamental questions are answered.

Thank you again for the opportunity to present this testimony.