



**Washington
Gas**
A WGL Company

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July 11, 2025

VIA ELECTRONIC FILING

Timothy R. Oberleiton
Earthjustice
1001 G St. NW,
Ste. 1000
Washington, D.C. 20001

**Re: Re: FC 1180 – Response to Sierra Club Data Request No. 2 pursuant
to Order No. 22455.**

Dear Mr. Oberleiton:

Washington Gas Light Company hereby submits its Response to Sierra Club Data Request No. 2, pursuant to Order No. 22455¹ in the above-referenced proceeding.

Kindly direct any questions to the undersigned.

Sincerely,

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

¹ Formal Case No. 1180, *In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service* ("Formal Case No. 1180"), Application to Increase Existing Rates, filed August 5, 2024.

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA
WASHINGTON GAS LIGHT COMPANY
FORMAL CASE NO. 1180

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO THE SIERRA CLUB

SIERRA CLUB FOLLOW UP DATA REQUEST NO. 2

Follow-up Questions 2-1 to 2-4

Order No. 22455 states:

In its compelled response, WGL provides the account in which the litigation expenses are included as well as the allocated amount included in this account for the test year and explains how it calculated those expenses for District ratepayers in the test year.¹⁹ Sierra Club now seeks litigation expense information outside of the test year. In Order No. 22423, the Commission directed WGL to provide information on litigation expenses as part of its burden to show that these expenses should be included in rate base. In linking the litigation expenses to inclusion in rate base, the Commission limited the scope of the data requests to information relevant to this proceeding. Thus, litigation expenses outside of the test year, which would not be included in rates, are beyond the scope of this proceeding. The Commission will not compel responses for litigation expenses beyond the test year. Additionally, Order No. 22423 did not require WGL to indicate whether other parties are funding this litigation and specifically excluded a data request that sought information on third party litigation funding. However, in WGL's compelled answer to Data Request No. 2-1 it states that the allocated costs of the cases referenced in Data Request Nos. 2-1 and 2-2 to the District in the historic test year were \$14,189. The case referenced in Data Request No. 2-2 is a case in Maryland. The Company has failed to clearly answer the question of whether WGL is using District ratepayer funds to finance the litigation in Data Request No. 2-2. If no, the WGL should state no. If yes, WGL should state how much District ratepayer

funds are being used to support this litigation in Maryland. Additionally, the Company has failed to provide a detailed ledger entry/breakdown for the \$14,189, therefore, the Company is directed to provide the breakdown for the test year as directed by Order 22423.²

WGL Response:

No. WGL is not using District ratepayer funds to finance the litigation in Data Request No. 2-2.

Below is a breakdown of the \$14,189 in litigation costs included in the historic test year of this case.

Date	Vendor	Amount	Description
5/22/2023	Law Firm	\$ 7,802.40	Legal Services
6/26/2023	Law Firm	\$37,045.30	Legal Services
7/31/2023	Law Firm	\$20,277.46	Legal Services
8/18/2023	Law Firm	\$ 8,247.44	Legal Services
9/22/2023	Law Firm	\$ 2,736.00	Legal Services
SUBTOTAL		\$ 76,108.60	
DC ALLOCATOR	18.64%	\$ 14,189 (rounded)	

Sponsor: James D. Steffes
Senior VP, Regulatory, Policy and Advocacy

² Formal Case No. 1180, Order No. 22455 at 9.

Follow-Up Data Request Nos. 2-16 and 2-17

Order No. 22455, states:

In reviewing the compelled responses, the Commission notes that they were generally responsive to Sierra Club's original requests in which WGL indicated that these costs are included in FERC USOA Account 426.4, an account that is not included in rate base. WGL also indicates that lobbying expenses for two lobbyists are also recorded in this account...Since expenses in FERC USOA Account 426.4 are not included in rate base, any further questions about the expenses in these accounts are not relevant to this proceeding. Likewise, any information not in the possession of WGL cannot be compelled."³

The Commission then directed:

To the extent that there are lobbying costs that are not included in FERC USOA Account 426.4 in WGL's control, WGL is compelled to provide this information within seven (7) days of the date of this Order. WGL did not respond to costs associated with government affairs. To the extent that there are government affairs costs that are not included in FERC USOA Account 426.4 and are included in the historic test year, WGL is compelled to provide this information within seven (7) days of the date of this Order.⁴

WGL Response:

Washington Gas does not have any record of lobbying costs not appropriately included in FERC USOA Account 426.4. Washington Gas employees in the government affairs function engage in many activities on behalf of the Company that are generally outside the scope of the definition of activities that are accounted for in 426.4, including customer impact and policy analysis, stakeholder engagement; public policy messaging; research and reporting; among others.

For the historic test year, the Company included in rates \$218,775 of allocated costs associated with government affairs labor costs.

Sponsor: James D. Steffes
Senior VP, Regulatory, Policy and Advocacy

³ Formal Case No. 1180, Order No. 22455 at 19.

⁴ *Id.*

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 11th day of July 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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of the District of Columbia
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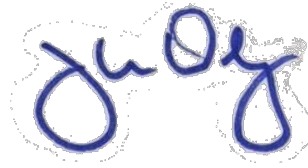
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