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**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA**
**1325 G STREET, N.W., SUITE 800**
**WASHINGTON, D.C. 20005**

# ORDER

**July 16, 2025**

**FORMAL CASE NO. 977, IN THE MATTER OF THE INVESTIGATION INTO THE QUALITY OF SERVICE OF WASHINGTON GAS LIGHT COMPANY, DISTRICT OF COLUMBIA DIVISION, IN THE DISTRICT OF COLUMBIA, Order No. 22461**

## I. INTRODUCTION

1. By this Order, the Public Service Commission of the District of Columbia ("Commission") denies Washington Gas Light Company's ("WGL" or "Company") request for a waiver of penalties for its failure to comply with certain provisions of the Commission's Natural Gas Quality of Service Standards ("NGQSS")[1] and Merger Commitment No. 50. The Commission does not believe a waiver of any penalty is warranted. Therefore, the Commission directs WGL to show cause why a penalty of $300,000 should not be imposed for its failure to comply with certain provisions of the NGQSS. WGL's response is due within fifteen (15) days of the date of this Order.

## II. BACKGROUND

2. The NGQSS rules establish performance standards and requirements to ensure that the natural gas utility and alternative service providers operating in the District of Columbia ("District") meet an adequate level of quality, reliability, and safety in providing natural gas service to District customers.[2] The Commission's rules require WGL to file quarterly and annual reports summarizing WGL's performance.[3] On January 31, 2025, WGL filed the Company's 2024 Annual Report and Request for Waiver ("Report").[4] No comments were filed in response to the Report.

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[1] 15 DCMR §§ 3700-3799 (2019).

[2] 15 DCMR §§ 3700-3799 (2019).

[3] 15 DCMR § 3707 (2019).

[4] *Formal Case No. 977, In the Matter of the Investigation into the Quality of Service of Washington Gas Light Company, District of Columbia Division, in the District of Columbia*, Washington Gas Light Company's Annual Report for Calendar Year 2024, filed January 31, 2025 ("Report"). WGL filed a public and confidential version of the Report. There are no page numbers on the Report; therefore, when this Order refers to a page number in the Report, the first page of the Report is page 1, with the remaining pages to be referred to sequentially thereafter.

## III. DISCUSSION

3. WGL acknowledges that the Company failed to meet specific NGQSS standards during Calendar Year ("CY") 2024. The Company requests that the Commission waive any penalties for its noncompliance for several reasons, including but not limited to: (1) WGL nominally underreported notifications for some planned and unplanned outages due to the Company's computer systems being taken offline for updates and/or security system issues; (2) the Leak Identification, Detection and Repair, and Odor Complaints ("LIDAROC") database[5] captures the items for which notifications were not sent; (3) the emergency odor call volume significantly increased during certain times of the reporting versus the resources available; (4) the technician class scheduled to begin in April was postponed; and (5) dispatching errors that caused technicians to not meet a four (4)-hour requirement to respond to emergency issues.[6] The Commission addresses the Company's failure to meet the standards, the explanations, and the waiver request below.

### a. Subsections 3701.8[7], 3701.10[8], and 3701.12[9] (Reporting Requirements for Reportable and Limited Service Outages and Gas Incidents),

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[5] Report at 13. LIDAROC is the master database that contains all records for all gas leaks and customer-reported gas-related odor complaints. Items where notifications were not sent are included in the LIDAROC, goes through the order life cycle, and is later updated in the LIDAROC reporting.

[6] Report at 13-18.

[7] 15 DCMR § 3701.8 states that

> The Natural Gas Utility shall report by telephone and e-mail all Incidents to the Office of Compliance and Enforcement ("OCE") and OPC at the earliest practicable time, but not later than one (1) hour after the Natural Gas Utility's dispatch has been informed of the Incident, with as much detailed information as possible. To the extent that all information required by Subsection 3701.11 is not available at the time of the initial communication, the Natural Gas Utility shall, within two (2) hours of the dispatch, supplement its initial report with the additional information. The Natural Gas Utility shall continue providing updates to the Commission and OPC on all Incidents as information becomes available or is requested by the pipeline safety inspector. This reporting requirement applies to business and non-business hours."

[8] 15 DCMR § 3701.10 provides that "[t]he Natural Gas Utility shall file an initial written report concerning all Incidents with the Commission, and a copy to OPC, within five (5) days of the event occurrence."

[9] 15 DCMR § 3701.12 states that "[t]he Natural Gas Utility shall update the initial written report and shall file same with the Commission, and a copy to OPC, within thirty (30) days of the event occurrence."

**Subsections 3702.3[10] and 3702.5[11] (Reporting and Repairing Requirements for Gas Leaks and Odor Complaints), and Subsections 3703.2[12], 3703.3[13], 3703.4[14], and 3703.5[15] (Reporting and Responding Requirements for Gas Emergencies).**

4. These subsections require WGL to notify the Commission and the Office of the People's Counsel for the District of Columbia ("OPC") of service outages, gas incidents, gas leaks,

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[10] 15 DCMR § 3702.3 states:

> The Natural Gas Utility shall report to OCE and OPC by telephone and e-mail all natural gas leaks, except gas leaks found inside residential and/or commercial customers' properties, at the earliest practicable time, but not later than one (1) hour after the Natural Gas Utility's dispatch has been informed about and determined that the gas odor complaint resulted from a leak and/or the dispatch has determined that a leak has occurred on the Natural Gas Utility's gas system, with as much detailed information as possible. To the extent all information required by Subsection 3702.5 is not available at the time of the initial communication, the Natural Gas Utility shall within two (2) hours of the dispatch supplement its initial report with the additional information….

[11] 15 DCMR § 3702.5 states that each telephone and e-mail report to OCE and OPC of Grade 1, Grade 2, and Grade 3 leak(s) due to a gas-related odor complaint shall state clearly, at a minimum, the following information:

(a) A description of the type of leak(s);
(b) The dates when the leak began and ended;
(c) The location of the leak(s), including street addresses and intersections, the ward(s) and/or quadrant(s);
(d) Pipe size, material, pressure and type of gas pipeline involved.
(e) The estimated number of customers and/or persons whose services were disrupted, if any;
(f) A preliminary assessment as to the cause of the leak(s), if known.
(g) The estimated time to repair the leak, if known; and
(h) The Natural Gas Utility shall provide OCE and OPC with regular updates to the initial report as it receives more information.

[12] 15 DCMR§ 3703.2 states in relevant part that "[a] A Gas Emergency shall be reported by telephone and e-mail to OCE and OPC with as much detailed information as possible at the earliest practicable time, but not later than thirty (30) minutes after the Natural Gas Utility's dispatch has been informed that a Gas Emergency has occurred. The Natural Gas Utility shall provide updates to the initial report as it receives more information…."

[13] 15 DCMR§ 3703.3 provides the same list of minimum filing information as 3702.5 above but moves the substance of section (g) to section (h) and adds a new section (g) which requires the gas company to provide "the time between becoming aware of the Gas Emergency and responding (arriving at the emergency site) to the Gas Emergency, if known." In addition, the provision added sections (i) "[t]he estimated time to repair Pipeline Facilities affected by the Gas Emergency, and/or restore service, if known", and (j) "[a] preliminary assessment as to any injuries, deaths, or personal property damage, if known.

[14] 15 DCMR§ 3703.4 provides that "[d]uring the course of a Gas Emergency on the Natural Gas Utility's system, the Natural Gas Utility shall report periodically by telephone and e-mail to OCE and OPC, regarding the status of the Gas Emergency and the utility's progress in clearing the Gas Emergency and making the site safe. The Natural Gas Utility shall provide updates or progress on the Gas Emergency every hour until the Gas Emergency is resolved."

[15] 15 DCMR§ 3703.5 states that "[w]ritten reports concerning all Gas Emergencies shall be filed with the Commission and OPC within five (5) days of the event occurrence. The Natural Gas Utility shall provide updates to its written report as it receives more information."

odor complaints, and gas emergencies. WGL reports that during each of the 2024 reporting quarters, there were a nominal number of underreported notifications for service outages, gas incidents, gas leaks, odor complaints, and gas emergencies due to planned or unplanned outages of the Company's IT system that supports the processing of the notifications required by the NGQSS rules.[16] WGL claims that: (1) to maintain the health and security of the IT technology platforms, the Company must frequently plan IT outages to patch and upgrade system components; (2) these IT outages mainly occur at night and over the weekend; and (3) when the IT systems are offline for updates, there is a slight possibility that notifications and reporting for service outages, gas incidents, gas leaks, odor complaints, and gas emergencies may be missed.[17]

5. During the second quarter, WGL conducted a few planned outages of the Systems, Applications, and Products ("SAP") system that impacted notifications on the dates of the outages (April 15-16, May 22-28, and June 15-16). The planned outages required WGL to implement its manual data recording process (sending notices manually by email), which is part of the Company's timeline for the resiliency plan that was filed with the Commission on June 27, 2024.[18] Once the IT system is back online, the manually collected data is entered into WGL's system of record, and the LIDAROC database captures this information.[19] For the third and fourth quarters, the Company indicates that there was nominal underreporting since there were a few planned outages and that notifications were manually sent out via email and subsequently captured in the LIDAROC database.[20]

6. WGL notes that the Company apprises Commission staff of unplanned outages that significantly impact RM37 notification and reporting.[21] According to WGL, the Company began upgrading its RM37 data processing, notification, and reporting systems and testing the new re-platformed system at the beginning of the third quarter. WGL states that the system is fully implemented and operational. WGL claims that "[t]he new system enables the RM37 system of records to handle high volumes of data during extreme events, such as large-area outages or future scenarios of advanced leak detection and monitoring programs.[22]

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[16] Report at 13, 14, 16, 17, and 18.

[17] Report at 13, 14, 16, 17, and 18.

[18] Report at 14, noting *Formal Case No. 977*, Washington Gas's Response to Order No. 22002, filed June 27, 2024, which set forth the timeline for the Resiliency Plan. WGL notes that during the second quarter, the resiliency plan was consistently tested, and some components were implemented.

[19] Report at 14-15.

[20] Report at 16.

[21] Report 13, 14, 16, 17, and 18.

[22] Report at 18. According to WGL, the new re-platformed RM37 system also facilitates field technicians' capturing the estimated damage costs for broken line incidents.

**b. Subsections 3702.2 (b), 3702.2 (c)/and 3702.2 (f)[23]/Merger Commitment No. 50[24] (Reporting and Repairing Requirements for Gas Leaks and Odor Complaints).**

7. WGL explains that the Company failed to comply with the noted response times for gas leaks and odor complaints for several reasons. During the first quarter, WGL reported that the emergency odor call volume (1152 odor calls) in January 2024 was 25% higher than any other January since 2020, with two (2) days that were particularly high (on January 18, there were 80 odor calls, and on January 23, there were 104 odor calls).[25] In addition, the Company reports that the February 2024 emergency odor call volume was the highest since February 2020, with 932 odor calls.[26]

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23 15 DCMR§ 3702.2, provides that the Natural Gas Utility shall:

(a) Respond to (be at the site of) all Code 1 Orders within thirty (30) minutes after the Natural Gas Utility's dispatch has been informed about the leak and/or odor complaint during business or non-business hours, on a monthly average basis; with no more than three (3) percent of the overall monthly response times over fifty (50) minutes and no single event response time exceeding two (2) hours;

(b) Respond to (be at the site of) all Code 2 Orders within sixty (60) minutes after the Natural Gas Utility's dispatch has been informed about the leak and/or odor complaint during business or non-business hours, on a monthly average basis; with no more than ten percent (10%) of the overall monthly response times over seventy-five (75) minutes and no single event response time exceeding four (4) hours;

(c) Respond to all Code 3 Orders, by making a determination as to the severity of the gas leaks and/or reported odor complaints and indicate to the customer/caller when a representative will be at the site, provided that on a monthly average basis, a representative will be at the site not later than ninety (90) minutes after the Natural Gas Utility's dispatch has been informed about the leak and/or odor complaint during business and non-business hours; with no more than twenty percent (20%) of the overall monthly response times over ninety (90) minutes and no single event response time exceeding six (6) hours;

… and

(f) Provide to OCMS and OPC on a quarterly basis the compliance reporting required by Subsection 3707.2. The Natural Gas Utility shall provide explanations if these time limits are exceeded, pursuant to Subsection 3708.3.

24 Merger Commitment 50. The commitment states that to the extent not already provided to the Commission, the Applicants shall file, quarterly, quality of service reports that examine pre- and post-Merger reliability and customer service performance. The reports shall examine and report monthly, items including but not limited to, the number of service disruptions/outages, cause of service disruptions/outages, length and duration of service disruption/outage, the number of safety/gas odor calls, average time to respond to safety/gas odor calls, the number of confirmed gas leaks, the number of leaks repaired, and the month-end Grade 2 leak backlog. *See Formal Case No. 1142, In the Matter of the Merger of AltaGas, Ltd. and WGL Holdings, Inc.*, Order No. 19396, Appendix A.

25 Report at 14.

26 Report at 13-14.

8. In the second quarter, WGL indicates that the Company missed the Subsection 3702.2(b) metric of arriving on the site of the odor call/leak complaint in not more than seventy-five (75) minutes from the time dispatch was contacted with no more than 10% of the overall monthly response times over seventy-five (75) minutes. WGL states that there were 599 Code 2 orders. Approximately 1% of these orders were not timely. Specifically, there were six (6) response times (April 5th, 11th, 14th, 17th, 24th, and June 13th ) that were one (1) to six (6) minutes outside of the 75-minute range, resulting in the Company not meeting the threshold.[27] WGL states that other than normal traffic, the Company has not been able to identify any specific reason for the limited additional time for response.[28] The Company notes that its Code 2 response times are improving from 73.7% in the first quarter compared to 89.2% in the second quarter.[29]

9. In the same quarter, WGL indicates that the Company missed the Subsection 3702.2(c) metric of arriving on the site of the odor call/leak complaint in not more than ninety (90) minutes from the time dispatch was contacted with no more than 20% of the overall monthly response times over ninety (90) minutes.[30] WGL states that there were 800 Code 3 orders, three (3) of which had times greater than the threshold of ninety (90) minutes, but all three (3) less than ninety-five (95) minutes.[31] Again, the Company is unable to identify any specific cause for the delayed response times other than normal traffic. WGL notes that its Code 3 response times are improving from 77.83% in the first quarter compared to 86.53% in the second quarter.[32]

10. In addition, during this quarter, WGL notes that it continues its efforts to recruit and train qualified technicians, with a plan to have 112 Leak-qualified technicians by the end of April.[33] In addition, eight (8) service assistants have been hired since October 2023, and the eight (8) Technicians currently in the Service Tech Development class are expected to be cleared for work in October 2024.[34]

11. For the third quarter, WGL states that there were fifty-seven (57) Code 2 odor calls in September with response times greater than seventy-five (75) minutes. According to WGL, twenty-seven (27) Code 2 odor calls resulted in the Company not meeting the metric, representing less than 4% of all Code 2 odor calls received for Q3.[35] The Company notes that in September,

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27 Report at 14-15.

28 Report at 15.

29 Report at 15.

30 Report at 16.

31 Report at 16.

32 Report at 16.

33 Report at 14.

34 Report at 14.

35 Report at 17.

there were 182 more emergency orders compared to August and 270 more than July. WGL contends that this higher volume of emergency calls was part of the reason for the missed NGQSS metric in September.[36]

12. During the fourth quarter, WGL stated that in October and December, the Company did not meet the Subsection 3702.2(b) metric requiring no more than 10% of the overall response times to exceed seventy-five (75) minutes. [37]In October, there were 999 emergency orders, of which 358 were Code 2 orders. WGL contends that this high volume of emergency orders was a causal factor for not meeting the NGQSS metric. WGL states that in December, the metric was not met due to the volume of Code 2 orders compared to the resources available.[38]

13. WGL notes that in November, for Subsection 3702.2(b), one (1) event exceeded the four (4)-hour response time metric due to a dispatcher error. WGL states that the dispatcher has been coached and provided additional training.[39] In addition, in December, the Company noted that two (2) single events exceeded the 4-hour response time, either from a delay in the dispatcher dispatching the order to a technician, or a dispatch system issue delaying the dispatch of the order to the technician.[40]

14. As for Code 3 orders, Subsection 3702.2(c), there was one (1) single event on October 21st for which the response time exceeded six (6) hours. WGL contends that thirty-eight (38) of these occurred between 6:00 p.m. and 9:00 p.m., with nine (9) occurring between 6:04 p.m. and 6:59 p.m. WGL contends that the higher call volume during this timeframe resulted in the response time exceeding six (6) hours.

15. WGL indicates that during the third quarter, the Company postponed an incoming class of nine (9) leak technicians, but that it is continuing to evaluate the staffing plan and supplement the number of leak response technicians with contractor resources and overtime for WGL technicians to meet the Company's NGQSS response times.[41] During the fourth quarter, the Company stated that it is continuing to evaluate the staffing plan for technicians to meet the NGQSS response times and that the postponed class will be convened in 2025.[42]

16. To address compliance failures, WGL indicated that it took remedial actions. Specifically, the Company: (1) performed internal coaching and training of dispatch staff; and (2)

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[36] Report at 17.

[37] Report at 18.

[38] Report at 18.

[39] Report at 18.

[40] Report at 18.

[41] Report at 18.

[42] Report at 18.

continued to plan to conduct additional service technician development schools in 2025 for training employees to respond to emergency orders.[43]

## IV. DECISION

17. The Commission continues to be concerned that WGL has consistently failed to comply with the NGQSS standards and annually requests that the Commission waive any penalty for noncompliance.[44] For the CY 2021 through 2023 reporting periods, WGL, among other things, failed to comply with several NGQSS rules (Sections 3701, 3702, and 3703) concerning notifications, delayed and missed service appointments, reporting requirements for gas leaks, and response times for Codes 1, 2, and 3 gas leak and odor complaints.[45] In CYs 2021 and 2022, the Commission granted WGL's waiver request and did not impose any penalties for the Company's failures, finding that the Company's computer system monitoring and enhanced quality control for notification and reporting were reasonable remedial actions.[46] For CY 2023, the Commission denied WGL's waiver request and imposed a $120,000 penalty for the failed notifications in reporting and the delayed response times to gas leaks and odor complaints. In addition, the Commission directed the Company to enhance and update its staffing plans, detailing its recruitment and retention efforts.[47]

18. For CY 2024, WGL concedes that the Company failed to comply with the notification provisions in §§ 3701.8, 3701.10, 3702.3, 3702.5, 3703.2, 3703.3, 3703.4, and 3703.5, and submitted a remedial plan and a waiver penalty request. The remedial plan notes that the Company's IT system planned outages impact the automated notification process and that the Company has instituted a manual data reporting process through emails during those periods of planned outages. However, the Company acknowledges that there may be a nominal amount of underreporting of outages that are eventually captured in the LIDAROC reporting, which contains all records for gas leaks and customer-reported odor complaints.[48] The remedial plan also notes that: (1) WGL has continued its efforts to enhance its RM37 reporting requirements by upgrading its data processing, notification, and reporting systems and testing the new platformed systems; and (2) WGL coached and retrained staff, planned and conducted additional service technician development schools, and continued monitoring of the IT problems. The Commission accepts WGL's remedial plan.

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43 Report at 14-19.

44 *Formal Case No. 977*, Order No. 21994, ¶ 9, rel. May 16, 2024 ("Order No. 21994").

45 *See Formal Case No. 977*, Order No. 21167, ¶ 4, June 16, 2022 ("Order No. 21167"); *Formal Case No. 977*, Order No. 21893, ¶¶ 5, 8, rel. August 10, 2023 ("Order No. 21893"); and *Formal Case No. 977*, Order No. 21994, ¶ 9, rel. May 16, 2024.

46 *Formal Case No. 977*, Order Nos. 21167, ¶ 4, and 21893, ¶¶ 5, 8.

47 *Formal Case No. 977*, Order No.21994, ¶ 12.

48 Report at 13, 15-17.

19. As noted in Order No. 21994, the Commission continues to hold "WGL[ ] responsible for ensuring the Company's proper operation of its IT technology to ensure timely notification of gas incidents to OPC and the Commission."[49] We recognize that the Company filed and implemented a manual notification resiliency plan to fill in the reporting gaps and address unforeseen situations that may interrupt the timely submission of notifications and dispatch work crews for gas emergencies. The Company's use of its resiliency plan has shown some improvement in WGL's reporting and timely submission of notifications. However, the Commission will continue monitoring the Company's progress in notification and reporting through the Annual NGQSS reports. In addition, the Commission directs Staff to convene three technical conferences with WGL and OPC within (60) days of the issuance of this Order, to address recurring inconsistencies in data reporting and outline measurable improvements to internal controls. The topics including but not limited to potential improvements to the NGQSS and LIDAROC reporting, data collection, record keeping, qualified technician training, and retention, shall be discussed at these technical conferences. At the conclusion of the technical conferences, the Commission directs the Company to include in the fourth quarter NGQSS Report and the 2025 Annual NGQSS Report detailed information outlining its improvement plan and explaining the steps it will be implementing to address the issues identified in this Order. The Commission also notes that a technical conference was held on July 9, 2025, in *Formal Case 1178* to discuss the LIDAROC Reporting and directs that information discussed in both cases related to LIDAROC be harmonized to ensure consistency and coherence in the proceedings.

20. WGL also concedes that it failed to meet certain response and dispatch timelines prescribed by §§ 3702.2 (b), (c)/and (f)/Merger Commitment No. 50 reporting requirements. Even though WGL has implemented an updated staffing plan, the Company continues to have issues with maintaining and increasing the number of qualified employees who can perform leak and odor complaint work. WGL notes that during this reporting period, the Company delayed the onset of a technician's class without providing a reason for doing so. This delay is concerning since appropriately qualified staffing has been a consistent concern for the Commission.

21. The Commission carefully reviewed and considered WGL's explanations, and the remedial actions taken by the Company. The Commission is not inclined to grant a waiver and believes that a penalty is warranted for the Company's failure to comply with the NGQSS for CY 2024. Pursuant to D.C. Code §§ 34-706 and 15 DCMR §§ 2397.2 and 3708, the Commission has the authority to adjudicate violations of the Commission's regulations and impose penalties on WGL.[50]

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[49] *Formal Case No. 977*, Order No. 21994, ¶ 11.

[50] D.C. Code § 34-706 (a) states in part that "[i]f any public utility shall violate any provision of this subtitle, . . ., for every such violation, failure, or refusal such public utility shall forfeit and pay to the District of Columbia the sum of $5,000 for each such offense…."

15 DCMR § 2397.2 states in part that violations of this chapter are subject to $100,000 or greater maximum penalty as established by federal laws or regulations for each violation but not to exceed $1,000,000 or greater maximum penalty as established by federal laws or regulations.

15 DCMR § 3708.1 provides:

22. For WGL's failure to comply with §§ 3701.8, 3701.10, 3701.11, 3701.12, 3702.3, 3702.5, 3703.2, 3703.3, 3703.4, and 3703.5, to provide adequate notification, the Commission proposes a penalty of $5,000 for each section of the three (3) categories of violations (Sections 3701, 3702, and 3703) in each month WGL failed to provide proper notifications.[51] That calculation equates to $45,000 for each of the four (4) quarters the Company was unable to meet the notification requirements, totaling $180,000. WGL is directed to Show Cause why the Company should not be subject to the $180,000 penalty proposed for WGL's failure to comply with 15 DCMR §§ 3701.8, 3701.10, 3701.11, 3701.12, 3702.3, 3702.5, 3703.2, 3703.3, 3703.4, and 3703.5.

23. Similarly, we believe that a penalty should be imposed for the Company's failure to adhere to the NGQSS §§ 3702.2 (b), (c)/and (f)/Merger Commitment No. 50 for responding to and reporting gas leaks and odor complaints. The Commission proposes a penalty of $5,000 per violation per month, equal to $30,000 for each of the four (4) quarters the Company failed to meet the response and reporting requirements, totaling $120,000.[52] WGL is directed to Show Cause why the Company should not be subject to the $120,000 penalty proposed for WGL's failure to comply with 15 DCMR §§ 3702.2 (b), (c)/and (f)/Merger Commitment No. 50.

24. In determining the penalty, the Commission considered: (1) the Company's previous similar violations in CY 2021 and CY 2022 for which we waived the penalty; (2) the similar violation in CY 2023 for which we imposed a penalty of $120,000; (3) the gravity of the violation in failing to notify the Commission and failing to respond timely to leak and odor complaints; (4) the duration of the violations which was from a few minutes to several hours for both the failure to provide notification for service outages, gas leaks, odor complaints, and gas emergencies as well as the response times for gas leaks, odor complaints, and gas emergencies; and (5) WGL's good faith efforts in attempting to achieve compliance by implementing the updated IT changes to the reporting system and instituting a manual process to capture the data during the period where there are reporting gaps. In addition, the Commission notes WGL's continued efforts in developing and implementing IT changes with the resiliency plan, reinforcing established policies, and continuing efforts to enhance recruitment and training.

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> The regulations in this chapter are natural gas quality of service standards, some of which affect the reliability of services provided to customers. Subsections 3701.2 to 3701.14 and 3705.1 to 3705.6 contain quality of service rules which are designated as reliability performance standards adopted by the Commission within the meaning of D.C. Official Code § 34-706(e). If a utility fails to comply with Reporting Requirements . . . it may be subject to forfeiture or civil penalty in accordance with D.C. Official Code § 34-706.

[51] 15 DCMR §§ 3708.2 and 3708.3 allows the Commission to impose penalties as set forth in D.C. Code §34-706(a) in the amount of $5,000 per incident and in accordance with Chapter 23. 15 DCMR §§ 2397.2 and 2397.4 set forth the limits per incident and provide a penalty chart for guidance. The penalty chart notes a base amount of $5,000 as the penalty for failure to provide incident reports and accurate notification of pipeline incidents.

[52] D.C. Code §34-706(a) sets forth a penalty amount of $5,000 per incident.

25. For the reasons noted above, WGL is directed to Show Cause why the Company should not be subject to the proposed $300,000 penalty described above. WGL shall submit its explanation and reasons why the Commission should not implement the proposed penalties within fifteen (15) days from the date of this Order.

26. If WGL does not contest the imposition of the penalty, payment of penalties is to be made by ACH/Wire Transfer. When making payment, WGL should submit an email (pscopcwires@psc.dc.gov) within two days of ACH/Wire Transfer to the AFO with the following information: 1) Case Number; 2) Company Name; 3) PSC Order No., if applicable; 4) Wire Transfer Submitted Date; 5) Wire Transfer Confirmation Number; and 6) Wire Transfer Amount.

**THEREFORE, IT IS ORDERED THAT:**

27. Washington Gas Light Company's request for waiver of penalties is **DENIED;**

28. Within sixty (60) days of the date of this Order, Commission Staff are to convene technical conferences to discuss problems and potential improvements to the Natural Gas Quality of Service Standard and the Leak Identification, Detection and Repair, and Odor Complaints notification, data collection and reporting systems;

29. Washington Gas Light Company is **DIRECTED** to include in the fourth quarter Natural Gas Quality of Service Standard Report and the 2025 Annual Natural Gas Quality of Service Standard Report detailed information outlining its improvement plan and explaining the steps it will be implementing to address the issues identified in this Order; and

30. Within fifteen (15) days of the date of this Order, the Commission **DIRECTS** Washington Gas Light Company to show cause why it should not be assessed a penalty of $300,000 for the Company's failure to adhere to the Natural Gas Quality of Service Standards, 15 DCMR §§ 3701.8, 3701.10, 3701.11, 3701.12, 3702.2 (b), (c), and (f)/Merger Commitment No. 50, 3702.3, 3702.5, 3703.2, 3703.3, 3703.4 and 3703.5.

**A TRUE COPY:** **BY DIRECTION OF THE COMMISSION:**

Brinda Westbrook-Sedgwick

**CHIEF CLERK:** **BRINDA WESTBROOK-SEDGWICK**
**COMMISSION SECRETARY**

**COMMISSION ACTION**

**FORMAL CASE NO. 977, IN THE MATTER OF THE INVESTIGATION INTO THE QUALITY OF SERVICE OF WASHINGTON GAS LIGHT COMPANY, DISTRICT OF COLUMBIA DIVISION, IN THE DISTRICT OF COLUMBIA,**

**Date 7/16/25 Formal Case No. 977 Tariff No.________ Order No. 22461**

| | Approve Initial & Date | Disapprove Initial & Date | Abstain Initial & Date |
|---|---|---|---|
| **Chairman Emile Thompson** | ET/JP 7/16/25 | | |
| **Commissioner Richard A. Beverly** | RB/JP 7/16/25 | | |
| **Commissioner Ted Trabue** | TT/JP 7/16/25 | | |

**Certification of Action**

Jamond D. Perry
**General/Deputy General Counsel**

**Kimberly Lincoln-Stewart**
**OGC Counsel/Staff**