FC874 - 2025 - G - 655, FC1167 - 2025 - M - 363

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Sandra Mattavous-Frye, Esq.
People's Counsel

July 25, 2025

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, N.W., Suite 800
Washington, D.C. 20005

Re: Formal Case No. 874, In the Matter of Gas Acquisition Strategies of District of Columbia Natural Gas, a Division of Washington Gas Light Company

Formal Case No. 1167, In the Matter of the Implementation of the Business Climate Plan

Dear Ms. Brinda Westbrook-Sedgwick:

Enclosed for filing in the above-referenced proceeding, please find the *Office of the People's Counsel for the District of Columbia's Comments in Response to Commission Order No. 22395.*

If there are any questions regarding this matter, please contact me at 202.727.3071.

Sincerely,

/s/ Adam Carlesco

Adam Carlesco
Assistant People's Counsel

Enclosure

cc: Parties of record

BEFORE THE
PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA

In the Matter of the Gas Acquisition	**)**	
Strategies of the District of Columbia	**)**	
Natural Gas, and	**)**	**Formal Case No. 874**
	)	**&**
In the Matter of the Implementation	**)**	**Formal Case No. 1167**
of Electric and Natural Gas	**)**	
Climate Change Programs	**)**	

COMMENTS OF THE OFFICE OF THE PEOPLE'S COUNSEL IN RESPONSE TO COMMISSION ORDER NO. 22395

Pursuant to Chapter 1 of the Public Service Commission of the District of Columbia's ("Commission" or "PSC") Rules of Practice and Procedure,[1] and Paragraph 8 of the Commission's Order No. 22395, the Office of the People's Counsel for the District of Columbia ("OPC"), the statutory representative of District of Columbia ("District") ratepayers with respect to utility matters,[2] respectfully submits these comments in the above-captioned proceeding.

1. Introduction

First, OPC thanks the Commission for soliciting comments on the best practices for determining and accounting for lifecycle greenhouse gas emissions ("GHG") from both the gas and electric sectors. OPC, as the statutory utility consumer advocate, believes that concrete data on the lifecycle impacts of the energy supplied to District residents is the fundamental cornerstone upon which all emission reduction efforts must rely – failure to adequately account for upstream sourcing impacts presents a skewed picture of each utility's environmental footprint

[1] 15 DCMR §100, *et seq*.
[2] D.C. Code § 34-804 (2020).

that allows for easy "greenwashing" of their services. OPC raised these concerns as they relate to Washington Gas Light's ("WGL") assertions on the sustainability of their gas sourcing practices, despite gas volumes increasing since the passage of DC's Climate Commitment Amendment Act of 2022[3] without the requisite renewable gas sources to compensate.[4] The Commission's decision to expand this inquiry to include Pepco's electricity sourcing is equally important given DC's local electric distribution company's reliance on gas power generation upstream amidst efforts to electrify the District.

2. OPC Comments

OPC provides the following responses to the PSC's specific inquiries and hopes that these help shape the future of accountability and compliance with the District's emissions reduction requirements from both utilities going forward:

a. What are industry best practices and regulatory best practices from other jurisdictions for tracking GHG emissions in the natural gas supply chain? Provide supporting work papers, documents, decisions, and other relevant information as applicable.

OPC supports using published protocols like the Greenhouse Gas Protocol.[5] This protocol's approach to Scope 1, 2, and 3 can be extremely useful in prioritizing emission sources, answering frequently asked questions, and accounting protocols. Additionally, state entities have robust reporting programs that include upstream methane leakage and lifecycle emissions. OPC

[3] D.C. Law 24-176.
[4] *See*, OPC, *OPC Comments Seeking Submission of Comprehensive Greenhouse Gas Emissions*, FC874 - 618, FC1167 - 234, November 29, 2023.
[5] Greenhouse Gas Protocol, *Standards & Guidance*, https://ghgprotocol.org/standards-guidance.

recommends referencing these frameworks, ensuring transparency and granularity (*e.g.,* identifying methane intensity per basin), and verifying data via independent audits to reduce the risk of underreported emissions.

Industry and regulatory best practices for tracking GHG emissions in the natural gas supply chain are increasingly comprehensive, covering everything from production (upstream) to final consumption (downstream). In addition to referencing the widely recognized Greenhouse Gas Protocol (particularly the Oil and Gas Sector Guidance), several jurisdictions and organizations have developed methodologies aimed at improving accuracy and transparency around methane leakage—often considered the most critical GHG in this sector due to its high global warming potential.

For instance, California's Air Resources Board ("CARB") mandates rigorous reporting of both CO_2 and methane for oil and gas operations, with operators required to submit detailed inventories of vented, flared, and fugitive emissions.[6] In parallel, entities like Colorado's Department of Public Health and Environment have specific rules requiring leak detection and repair (LDAR) programs and systematic data submission.[7] On the international front, initiatives such as the Oil and Gas Methane Partnership 2.0 (OGMP 2.0)—coordinated by the United Nations Environment Program—encourage participating companies to measure and report methane emissions using progressively higher levels of direct measurement, rather than relying solely on engineering estimates.[8] These approaches often include third-party audits or

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[6] *See, e.g.*, California Air Resources Board, *AB 2195 Report on Upstream Emissions of California's Natural Gas Consumption,* https://ww2.arb.ca.gov/resources/documents/ab-2195-report-upstream-emissions-californias-natural-gas-consumption?keywords=2025.
[7] Colorado Dept. of Public Health & Environment, *Leak detection and repair (LDAR) annual reports*, https://cdphe.colorado.gov/leak-detection-and-repair-ldar-annual-reports.
[8] Oil & Gas Methane Partnership 2.0, https://www.ogmpartnership.org/.

verification protocols to minimize the risk of underreporting. Furthermore, requiring basin-level methane intensity reporting can highlight whether certain geographic sources have disproportionately high GHG footprints. While DC lacks any fossil fuel extraction operations, use of metrics from other states can be used to inform upstream estimates.

Adopting a combination of these methods (*e.g.,* annual LDAR reporting requirements, real-time or periodic monitoring using emerging technologies such as drones or satellites) enables regulators and stakeholders to pinpoint high-leak sources more accurately. The Commission can also incorporate the outcome from FC1178.[9] Overall, OPC strongly recommends that the Commission review and incorporate these advanced frameworks, ensuring both transparency and independent verification, so that GHG emissions in the District's natural gas supply chain are measured, reported, and ultimately reduced in line with District emissions reduction obligations.

b. What are industry best practices and regulatory best practices from other jurisdictions for tracking GHG emissions associated with power generation, transmission, and energy distribution to the District? Provide supporting work papers, documents, decisions and other relevant information as applicable.

[9] Formal Case No. 1178 – *In the Matter of the Petition For Investigation Into Washington Gas Light Company's System Leak Reduction Practices.*

For the electric sector, ISO/RTO metrics (*e.g.,* NYISO)[10] and EPA's eGRID[11] can provide a foundation for tracking emissions from generation, while GHG Protocol Scope 2 Guidance[12] is helpful for quantifying indirect emissions. Jurisdictions like Washington State have started requiring utility-specific carbon intensity reporting,[13] and PJM's System Mix data can aid in identifying generation sources.[14] As laboratories for innovation and trial, the best outcomes from climate-related efforts can be realized if states lead.[15] Furthermore, regulated utilities should also be required to study and report their utility networks' carbon footprint.[16] It has been found that the attributional method, such as inventories and removal of emissions within a certain boundary, is less effective in assessing the actual GHG emissions. Instead, consequential methods, in which information is provided on the system-wide effects caused by actions, are found to better inform decisions to reduce emissions.[17] Requiring utilities to not only follow protocols that are proven to be effective but also to adopt methods and practices that offer the best estimate of GHG

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[10] New York State Energy Research and Development Authority (NYSERDA), *Projected Emissions Factors for New York State Grid Electricity,* August 2022, https://www.nyserda.ny.gov/-/media/Project/Nyserda/Files/Publications/Energy-Analysis/22-18-Projected-Emission-Factors-for-New-York-Grid-Electricity.pdf ; NYSERDA, *New York Generation Attribution System,* https://www.nyserda.ny.gov/All-Programs/NYGATS.
[11] U.S. Environmental Protection Agency, *Emissions & Generation Resource Integrated Database (eGRID)*, https://www.epa.gov/egrid.
[12] GHG Protocol, *Scope 2 Guidance*, https://ghgprotocol.org/scope-2-guidance.
[13] Washington State Dept. of Ecology, *Utility Specific Carbon Intensity of Electricity,* https://apps.ecology.wa.gov/publications/documents/2414014.pdf.
[14] https://gats.pjm-eis.com/gats2/PublicReports/PJMSystemMix.
[15] Reema Bzeih, et al., *States Must Lead the Way on Climate,* Center for American Progress, Jan. 7, 2025, https://www.americanprogress.org/article/states-must-lead-the-way-on-climate/.
[16] Persefoni, *Energy Utility Networks Carbon Footprint: Emissions Profile Insights*, June 27, 2024, https://www.persefoni.com/blog/emissions-profile-energy-utility-networks.
[17] Brander, M., *The most important GHG accounting concept you may not have heard of the attributional-consequential distinction*, Carbon Management, *13*(1), 337–339, 2022, June 19, 2022, https://doi.org/10.1080/17583004.2022.2088402.

emissions is important. OPC also encourages robust verification of renewable energy certificates (RECs) and transparent accounting for electricity imports/exports.

c. To the Department of Energy and Environment ("DOEE"), how does the District account for both upstream and downstream GHG emissions in tracking emissions from natural gas in the District?

OPC defers to DOEE for the specific District accounting methodology. However, OPC urges DOEE to incorporate upstream methane intensities in addition to end-use combustion, referencing local emission reduction policies (*e.g.,* the Climate Commitment Amendment Act of 2022) and external data (*e.g*., EPA or DOE studies, EIA data). This ensures full lifecycle tracking consistent with DC's net-zero targets.

Accurately quantifying GHG emissions in cities can be challenging, as seen in many European cities.[18] Therefore, DOEE may need to review existing data for comprehensiveness and transparency and provide improvement guidelines.[19]

[18] A. Hsu, et al., *Predicting European cities' climate mitigation performance using machine learning*, Nature Communications, No. 13, page 7487, Dec. 2022, https://doi.org/10.1038/s41467-022-35108-5, available at https://www.nature.com/articles/s41467-022-35108-5.

[19] Nadia Mirabella, Karen Allacker, *Urban GHG accounting: discrepancies, constraints and opportunities,* Buildings & Cities, Vol. 2, Issue 1, Jan. 7, 2021, pp. 21-35, https://journal-buildingscities.org/articles/10.5334/bc.50.

d. To the Department of Energy and Environment ("DOEE") how does the District account for both upstream and downstream GHG emissions in tracking emissions from the electric distribution system in the District?

OPC encourages DOEE to apply scope-based GHG assessments and to track the District's grid mix through PJM's Residual Mix data.[20] The PJM Generation Attribute Tracking System (PJM-GATS)[21] issues certificates for generation from all resource types and all electricity generation in its footprint and calculates its own System Mixes and Residual Mixes for use in power source disclosure programs. The Residual Mix is calculated as the weighted average of resource types and emission factors for all unclaimed certificates and includes CO_2 emissions factors (lbs CO_2/MWh) of the generation included in unsold certificates tracked in all-generation tracking systems. DOEE's report on GHG emissions from natural gas and electricity should be validated in cooperation with Pepco and WGL and made available to the public.

e. Do intervenors agree with the Office of the People's Counsel's ("OPC") recommendation to require WGL to provide "[d]etailed reports on both upstream and downstream greenhouse gas ("GHG") emissions, quantifying the specific volumes of methane and other GHGs across the entire natural gas lifecycle – from extraction, transportation, storage, to combustion?" If intervenors would recommend changes to this reporting metric, what are they?

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[20] Clean Energy Accounting Project, *Residual Mix Applications and Existing Data*, Sept. 2023, https://resource-solutions.org/wp-content/uploads/2023/09/Residual-Mix-Use-Cases-and-Existing-Data.pdf.

[21] PJM Environmental Information Services, *About GATS,* https://www.pjm-eis.com/getting-started/about-GATS.aspx.

OPC stands by its recommendation for WGL to provide comprehensive GHG data from wellhead to burner tip. Moreover, WGL's provision of upstream emissions estimates based on gas basin sourcing within its recent 15-year plan demonstrates that such information is fully capable of being provided and considered.[22] Detailed upstream and downstream reporting reduces "hidden" emissions, informs Commission decisions, and enables targeted leak-reduction measures. If any intervenors propose modifications, OPC requests they maintain robust detail and verification for transparency and accountability.

f. Do intervenors support a requirement for PEPCO to provide detailed reports on both upstream and downstream GHG emissions quantifying the specific volumes and sources of GHG emissions across the entire electric generation, transmission and distribution lifecycle? If intervenors would recommend changes to this reporting metric, what are they?

OPC likewise supports requiring Pepco to submit holistic emissions data, covering everything from fuel extraction for contracted fossil fueled generation to local distribution line losses. Such reporting would better align Pepco's procurement with DC's net-zero mandate and support data-driven decisions on capacity and reliability improvements. Pepco's account of upstream GHG emissions should use the data from PJM, FERC, and the EIA on the source and volume of energy generation and transmission delivered to the District.

[22] Formal Case No. 1167, *WGL's 15-Year Plan*, Item No. 307, submitted June 9, 2025.

g. Do intervenors agree with OPC's recommendation to require WGL to provide "[i]dentification of the origin of procured natural gas, distinguishing between gas sourced from hydraulic fracturing and conventionally sourced gas. This should include an assessment of environmental impacts and emissions intensities based on the extraction method and basin of origin?" If intervenors would recommend changes to this metric, what are they?

OPC supports disclosure of gas sourcing by basin and distinguishing between gas produced via hydraulic fracturing and conventional extraction. Extraction emissions intensity can vary widely between U.S. gas basins, with gas produced within the Permian Basin, Gulf Coast, or the Dakotas' Williston Basin carrying a markedly higher emissions intensity than gas produced within Marcellus and Utica shales.[23] Identifying environmental impacts per extraction basin helps regulators and the public assess whether WGL's supply chain aligns with the District's emission reduction and energy justice objectives. While pooling points along the gas transmission system may obfuscate sourcing to a certain degree, shippers oftentimes have source percentage information for gas moving through a pooling point based upon upstream shipping contracts. As mentioned above, WGL has been able to provide estimates based upon these aggregate averages within its recent 15-year plan in Formal Case No. 1167, so providing this information to the Commission is absolutely feasible.

[23] *See, e.g.*, Clean Air Task Force, *Benchmarking Methane and Other GHG Emissions,* June 2021, at https://www.catf.us/wp-content/uploads/2021/06/OilandGas_BenchmarkingReport_FINAL.pdf.

h. Do intervenors agree with OPC's recommendation to require WGL to provide "[d]ocumentation of the proportion of renewable natural gas (RNG) or hydrogen blended within the overall gas supply, indicating the commitment to transitioning to a lower carbon gas mix," including whether "[h]ydrogen sourcing should disclose whether it is 'gray hydrogen' derived from methane steam reforming of fossil gas or 'green hydrogen' made from electrolysis via renewable energy as lifecycle emissions profiles vary drastically depending on sourcing?" If intervenors would recommend changes to this metric, what are they?

OPC reiterates the need for WGL to detail how much renewable gas or hydrogen is in its supply, plus the hydrogen's source (*e.g.*, gray vs. green hydrogen). Lifecycle emissions vary dramatically with production methods, as much of the hydrogen market is supplied via steam-methane reformation, which uses fossil methane to form hydrogen – essentially greenwashing natural gas as a renewable carbon-free resource.[24] Clarity on these volumes aids in verifying whether WGL is genuinely transitioning to lower-carbon fuels rather than merely rebranding fossil gas.

While WGL has removed hydrogen blending or replacement from its proposed options within its recent 15-year plan, it is still beneficial to have such disclosure should WGL once again change its mind. Such disclosure is also beneficial for RNG sourcing as different sources

[24] Jan Rosenow, *Is heating homes with hydrogen all but a pipe dream? An evidence review,* Joule, Vol. 6, Issue 10, pp. 2225-2228, Oct. 19, 2022, https://www.cell.com/joule/fulltext/S2542-4351(22)00416-0 ("More than 95% of global hydrogen production is currently based on fossil gas and coal with no carbon abatement"); Hannah Hyunah Cho, Vladimir Strezov, *Environmental impact assessment of hydrogen production via steam methane reforming based on emissions data*, Energy Reports, Volume 8, November 2022, Pages 13585-13595, https://www.sciencedirect.com/science/article/pii/S2352484722019874.

of RNG have drastically different environmental footprints (*i.e.*, sourcing from municipal wastewater treatment plants and landfills compared to large-scale concentrated animal feeding operations).

i. Do intervenors have any recommendations to require PEPCO to provide documentation on the proportion of renewable sources blended within the overall electric supply including generation source, total electric generation in megawatt-hours (MWh), the percentage of renewable energy contribution and emission intensities? What additional metrics should be included?

OPC supports a reporting requirement for Pepco's generation mix, including the percentage of truly renewable clean energy sources (*i.e.*, wind, solar, hydro, geothermal). This should capture annual MWh sourced, associated emission factors, and any relevant REC transactions or offsets to track progress toward DC's Renewable Portfolio Standard and Clean Energy DC plan. Pepco's fuel mix report should, in addition to elements listed under question "I", list the electricity contract under a possible long-term power purchase agreement it is pursuing to execute.

j. Do intervenors agree with OPC's recommendation to require WGL to provide "[c]omprehensive reporting on the total volume and relative percentage of natural gas lost due to leaks, venting, flaring, or other inefficiencies during production, transmission, and distribution phases?" If intervenors would recommend changes to this metric, what are they?

OPC maintains that thorough reporting on methane losses across the supply chain is crucial. Precise data on leak rates, venting, and flaring would better direct attention to where infrastructure repairs or other mitigation efforts can deliver the greatest emission reductions at the lowest cost. It is also important in determining whether the use of gas provides any net GHG emissions reduction benefits given that an average leakage rate of ~4.5% places gas emissions on par with power generated from coal.[25] Detailed, verifiable figures also enable the Commission to assess whether WGL's net GHG impact aligns with DC's climate statutes.

k. Do intervenors have recommendations on how PEPCO should provide comprehensive reporting that tracks losses or inefficiencies during the production, transmission and distribution of electricity? What metrics should be included in that documentation?

OPC recommends Pepco provide annual line-loss data alongside broader system inefficiencies to understand how well the utility maximizes energy delivery. Metrics explaining any power loss through distribution equipment and PJM averages of generation efficiency should also be included. In addition, any tracking and reports must be reviewed alongside a pre-determined baseline so that it is easier to identify problems or issues and take remedial action.

l. Do intervenors agree with OPC's recommendation to require WGL to provide "[a] clear and analytical comparison of WGL's procurement strategies and resulting

[25] Deborah Gordon, et al., *Evaluating net life-cycle greenhouse gas emissions intensities from gas and coal at varying methane leakage rates,* Envt'l Research Letters, Vol. 18, No. 8, July 17, 2023, https://iopscience.iop.org/article/10.1088/1748-9326/ace3db.

GHG emissions against the District's climate targets, with references to the benchmarks established in local climate action laws and plans (e.g., Climate Commitment Amendment Act of 2022, Sustainable DC, Clean Energy DC)?" If intervenors would recommend changes to this metric, what are they?

OPC reiterates that comparing WGL's procurement approach to DC's 60% by 2030 and net-zero by 2045 benchmarks is vital for determining if proposed procurement measures and long-term plans will comply with District law. Concrete metrics also help identify shortfalls early and push WGL to adopt a credible net-zero roadmap. This alignment is essential for preventing stranded asset risks and ensuring consistent progress towards the District's statutory goals.

m. Do intervenors have any recommendations requiring PEPCO provide a clear and analytical comparison of PEPCO's electric procurement strategies and resulting GHG emissions against the District's climate targets with references to the benchmarks established in local climate action laws and plans (e.g., Climate Commitment Amendment Act of 2022, Sustainable DC, Clean Energy DC)? If intervenors would recommend changes to this metric, what are they?

OPC similarly advocates that Pepco present an analytical comparison of its electric sourcing and resulting emissions reductions against DC laws and action plans (*e.g.,* Clean Energy DC).[26] This fosters transparency around whether the utility's generation and procurement mix is evolving in step with mandated decarbonization milestones and not simply burning the

[26] District Dept. of Energy and Environment, *Clean Energy DC*, https://doee.dc.gov/cleanenergydc.

same gas for electricity generation that WGL would otherwise ship for direct combustion. Since Pepco's procurement practices are directed by the DC PSC, it is crucial for the Commission to direct Pepco on how it approves its annual procurement support to the District's climate goal.

n. Do intervenors agree with OPC's recommendation to require WGL to provide "materials that showcase WGL's stakeholder engagement efforts aimed at soliciting and incorporating input on procurement practices and environmental impacts?" If intervenors would recommend changes to this metric, what are they?

OPC maintains that requiring WGL to document stakeholder engagement activities, especially with impacted communities, ensures that major procurement decisions and environmental strategies are inclusive and publicly vetted. Transparent stakeholder engagement enhances trust and facilitates better outcomes.

o. Do intervenors have recommendation(s) to require PEPCO to provide "materials that showcase PEPCO's stakeholder engagement efforts aimed at soliciting and incorporating input on procurement practices and environmental impacts?" If intervenors would recommend changes to this metric, what are they?

OPC also supports Pepco publishing its stakeholder engagement initiatives (*e.g.*, community advisory groups, public comment sessions) for procurement planning. By capturing voices from all District wards—especially historically underserved areas—Pepco can better align its investments with local environmental and equity goals. Transparency and stakeholder consultation on Pepco's energy procurement practices are vitally important to gauge the extent to

which the company is pursuing activities that support the District's climate goal. However, for transparency purposes and to facilitate a balanced record, the PSC should direct witnesses to divulge any connection they may have with the utilities.

p. Do intervenors agree with OPC's recommendation to require WGL to provide "[d]etailed accounts of WGL's investments in carbon offset programs, methane capture technologies, and any innovative practices adopted to mitigate the climate impacts of its current gas procurement activities, particularly in the context of regulatory changes such as those stemming from *Formal Case No. 1167*?" If intervenors would recommend changes to this metric, what are they?

OPC believes that providing details on these investments makes it easier to verify if WGL's claimed emission-reduction programs truly reduce climate impacts or merely serve as greenwashing. Detailed reporting also clarifies how offset programs comply with ongoing regulatory changes, including those under FC1167, and whether they are a cost-effective approach to mitigating carbon emissions pursuant to DC law.

q. Do intervenors agree with OPC's recommendation to require WGL to provide "year-on-year comparative metrics to facilitate tracking of WGL's progress in aligning its gas procurement with climate objectives?" If intervenors would recommend changes to this metric, what are they?

OPC asserts that annual progress metrics tracking WGL gas procurement's alignment with District emission reduction laws are vital to ensure timely progress toward statutory and

regulatory goals. Year-over-year comparisons highlight trends, reveal shortfalls, and provide accountability by ensuring WGL's efforts are sufficient and transparent. Such emissions tracking should also take a modified approach since the District is densely populated and surrounded by larger jurisdictions with climate policies that do not necessarily align with those of the District.

r. Do intervenors have any recommendations to require PEPCO to provide year-on-year comparative metrics to facilitate tracking of PEPCO's progress in aligning its electric procurement with climate objectives? If intervenors would recommend changes to this metric, what are they?

Similarly, OPC endorses a yearly tracking mechanism for Pepco's procurement and emissions data. Consistent trend analysis fosters informed policymaking and verifies whether Pepco's energy transition strategies keep pace with District mandates. While tracking emissions and aligning with procurement, it is also equally important to require utilities to develop a framework on how to effectively reduce future emissions associated with procurement practices.

s. Please describe any additional metrics or reporting requirements that intervenors believe are necessary to track GHG emissions in the natural gas and electric supply chains.

OPC proposes refining social metrics, such as how distribution infrastructure costs affect different income brackets, which can further ensure electrification and gas infrastructure maintenance do not exacerbate existing inequities. OPC also asserts that it is plausible that greater emissions may occur in less insulated residences or buildings in proximity to frequent gas

leaks and outages. Emission reduction strategies should develop a plan that has the potential to effectively reduce emissions in these locations within the city.[27]

3. Conclusion

For the foregoing reasons, OPC respectfully requests the Commission consider and adopt the recommendations herein requiring the District's regulated utilities to provide more robust and accurate lifecycle emissions data to better track progress towards the District's decarbonization mandates.

Respectfully submitted,

/s/ Sandra Mattavous-Frye

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[27] Mittakola, R.T., et al., *Drivers of natural gas use in U.S. residential buildings,* Science Advances, Vol. 10, No. 14, April 3, 2024, https://www.science.org/doi/10.1126/sciadv.adh5543.

CERTIFICATE OF SERVICE

Formal Case No. 874, In the Matter of Gas Acquisition Strategies of District of Columbia Natural Gas, a Division of Washington Gas Light Company

Formal Case No. 1167, In the Matter of the Implementation of the Business Climate Plan

I certify that on July 25, 2025, a copy of the *Office of the People's Counsel for the District of Columbia's Comments in Response to Commission Order No. 22395* was served on the following parties of record by hand delivery, first class mail, postage prepaid or electronic mail:

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