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July 25, 2025

VIA ELECTRONIC FILING

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission of the District of Columbia
1325 "G" Street, N.W., 8th Floor
Washington, D.C. 20005

Re: FC Nos. 874 and 1167 [Washington Gas's Comments]

Dear Ms. Westbrook-Sedgwick:

Pursuant to Order Nos. 22407 and 22395 in the above-referenced proceedings please find attached Washington Gas Light Company's Comments.

Please direct questions to the undersigned.

Sincerely,

John 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 THE GAS ACQUISITION STRATEGIES OF THE DISTRICT OF COLUMBIA NATURAL GAS, A DIVISION OF THE WASHINGTON GAS LIGHT COMPANY	)	Formal Case No. 874
and		
IN THE MATTER OF THE IMPLEMENTATION OF THE CLIMATE BUSINESS PLAN	)	Formal Case No. 1167

WASHINGTON GAS LIGHT COMPANY'S COMMENTS

Pursuant to Order Nos. 22407 and 22395 in the above-captioned matters, Washington Gas Light Company ("Washington Gas" or "Company") hereby submits its Comments regarding reporting and evaluation criteria for greenhouse gas ("GHG") emissions in the energy supply chain to the Public Service Commission of the District of Columbia ("Commission").

PROCEDURAL HISTORY RELEVANT TO THIS MOTION

1. By Order No. 21921 released October 27, 2023, the Commission directed the Gas Procurement Working Group ("GPWG") to discuss and file a report by April 30, 2024, in both Formal Case Nos. 874 and 1167, on what reporting and evaluation criteria are necessary to measure the impact of Washington Gas' gas procurement activities on the District of Columbia's climate goals, reflecting the minimum reporting criteria for

measuring the impact. The GPWG was directed to discuss this topic at its December 2023 meeting.[1]

2. On November 29, 2023, OPC filed comments which requested the Commission adopt at least eight (8) types of information to be included in compliance filings required under Commission Order No. 21921.[2]

3. On December 5, 2023, representatives from Washington Gas, the Office of People's Counsel ("OPC"), and Commission Staff attended the scheduled GPWG meeting. The parties discussed all eight (8) OPC recommendations.

4. On March 7, 2024, representatives from Washington Gas, OPC, and Commission Staff attended another GPWG meeting to continue discussions on reporting and evaluation criteria.[3]

5. On June 14, 2024, Washington Gas filed "The Gas Procurement Working Group Report on the Minimum Criteria—Reporting and Evaluation Criteria Necessary to Measure the Impact of Washington Gas Light Company's Procurement Activities on the District's Climate Goals" ("GPWG Initial Report").[4] The GPWG Initial Report included a discussion of OPC's proposed criteria and Washington Gas' recommendations that the Commission reject them or provide the parties further time to reach consensus. The Company also recommended that the discussion of a holistic response to emissions reductions continue in Formal Case 1167, the docket examining the District's Climate

[1] Formal Case No. 874, *In the Matter of the Gas Acquisition Strategies of the District of Columbia Natural Gas, a Division of the Washington Gas Light Company*, Order No. 21921, ⁋⁋ 14, 15, 1819 (October 27, 2023)
[2] Formal Case No. 874, Comments of the Office of People's Counsel Seeking Submission of Comprehensive Greenhouse Gas Emissions Reporting (November 29, 2023)
[3] WGL filed three unopposed motions to extend the deadline to file the GPWG's Initial Report on April 29, May 15, and May 29, 2024.
[4] Formal Case No. 874, Washington Gas Initial Report (June14, 2024)

Goals, rather than Formal Case 874, the docket reviewing Washington Gas' gas procurement activities and strategies. Finally, the Company concluded that it would be premature to set criteria related to Scope 3 emissions since there is no authoritative requirement or industry standard regarding the collection and calculation of Scope 3 emissions.

6. On March 27, 2025, the Commission issued Order No. 22395 which accepted, but did not approve, the GPWG Initial Report.[5] Instead, the Commission released a Notice of Inquiry ("NOI") requesting input from stakeholders in Formal Case No. 1167 about recommended minimum filing requirements to track GHG emissions in Washington Gas' gas procurement reporting as well as reporting requirements for the Potomac Electric Power Company ("Pepco") regarding GHG emissions across the entire electric generation, transmission, and distribution lifecycle.[6]

7. On April 24, 2025, the Commission issued Order No. 22407, which granted Washington Gas' Motion for Extension of Time to File Comments on issues raised in the NOI in Order No. 22395, and which established June 27, 2025 and July 23, 2025 as the deadlines for Comments and Reply Comments, respectively.

8. As instructed in Order No. 22313, on June 9, 2025, Washington Gas filed its 15-Year Plan with the Commission in Formal Case No. 1167. Washington Gas' filing presented a Base Forecast that included the Company's anticipated customer counts, demand, and GHG emissions over the next 15 years, assuming existing rules and regulations remain in place, as well as estimates of several emission reduction options and the associated impacts such options may have. While the 15-Year Plan document

[5] Formal Case No. 874, Order No. 22395 at 1 (March 25, 2025).
[6] *Id.*

is designed to be only a part of the important process to reduce emissions in the District in a way that is immediate, feasible, and cost-effective for customers, relevant to this comment, the Company included certain Scope 3 emissions data and forecasts. The Scope 3 emissions included downstream end-user combustion emissions and emissions associated with gas imported into Washington Gas' distribution system ("upstream gas").[7]

DISCUSSION

A. THE COMMISSION CORRECTLY IDENTIFIED FORMAL CASE NO. 1167 AS THE PROPER DOCKET TO CONSIDER MINIMUM CRITERIA FOR REPORTING ON HOW ENERGY PROCUREMENT FACILITATES THE DISTRICT'S CLIMATE GOALS.

In Order No. 22395, the Commission correctly identified the need to coordinate the evaluation of emissions reporting criteria with the work ongoing in Formal Case No. 1167. Washington Gas supports the Commission going a step further and integrating various other emissions reporting obligations. As the Commission is aware, Washington Gas files numerous reports related to GHG emissions in several dockets, with varying criteria and varying reporting deadlines. For example, in Formal Case No. 1167 Washington Gas files reports, including:

- Gas Procurement Working Group Report – FC 874/1167, Order No. 21921
- Certified Gas Activities Report – FC 1167, Order No. 21128
- Climate Business Plan – FC 1169, Order No. 21039, FC 1142/1167, Order No. 20662
- Annual CBP Meeting – FC 1142, Order No. 19396, Commitment 79
- 15-Year Plan – FC 1167, Order Nos. 22313 and 22339

[7] Note that the term "upstream gas" refers to gas imported into Washington Gas' distribution system.

Further, the Company compiles and reports emissions data in Formal Case No. 1162—the Company's base rate case filed in January of 2020.[8] Specifically, in Order No. 20705, the Commission approved the "Non-Unanimous Agreement of Stipulation and Full Settlement" ("Settlement") filed by Washington Gas. The Settlement requires that the Company file an annual report with the Commission that reports on its GHG emissions associated with the delivery of gas to District of Columbia customers in the previous calendar year.[9] The Commission stated that Washington Gas' annual report "will help advance the District's climate goals" and "assist the Commission and the District greatly by quantifying GHG emissions so that WGL GHG emission reductions can be targeted."[10] The company only reports Scope 3 emissions associated with the use of sold natural gas through the EPA greenhouse gas reporting program ("GHGRP"), no additional scope 3 emissions are reporting as part of its annual filing.

Finally, in PGC-AUDIT-2025-01—the triennial Purchased Gas Charge Management Audit—the Statement of Work includes an examination of items related to the District's Climate Goals that may implicate further GHG reporting, including related to the Company's certified natural gas ("CtNG") and renewable natural gas ("RNG") practices.[11]

The Commission is now exploring climate-related reporting criteria with respect to the Company's energy acquisition activities. On March 27, 2025, in Formal Case No. 874, the Commission issued Order No. 22395 which, *inter alia*, accepted, but did not adopt,

[8] Formal Case No. 1162, *In the Matter of the Application of Washington Gas Light Company for Authority to Increase Existing Rates and Charges for Gas Service* (January 13, 2020)

[9] Formal Case No. 1162, Order No. 20705, Attachment A, Section 8 (February 21,2021).

[10] Formal Case No. 1162, Order No. 20705, ¶¶ 36, 32.

[11] PGC-AUDIT-2025-01 (Draft Agreed-Upon-Procedures) (May 1, 2025).

the GPWG Initial Report regarding the reporting and evaluating criteria necessary to measure the impact of Washington Gas' procurement activities on the District of Columbia's climate goals.[12] In the same Order, the Commission issued the NOI, to which the Company now responds, in which it "requests input from stakeholders about recommended minimum filing requirements to track [GHG] emissions in WGL gas procurement reporting."

Washington Gas supports consolidating and rationalizing the Company's current emissions reporting obligations within Formal Case No. 1167. Further, to the extent the Commission determines that it needs to hear from other parties and stakeholders on this matter, the Company reiterates its willingness to discuss the content and format of consolidated emissions reporting.

B. THE COMMISSION CORRECTLY IDENTIFIED THAT ELECTRIC AND GAS COMPANIES SHOULD HAVE SIMILAR METRICS AND REPORTING CRITERIA DEVELOPED SIMULTANEOUSLY.

If the Commission ultimately sets minimum emissions reporting criteria for energy supplies, the Commission correctly identified that it is necessary to set similar metrics and reporting requirements for both the natural gas and electric systems. As the Commission indicated in Order No. 22395, consideration and establishment of metrics for *both* energy systems is a necessary predicate to reporting.[13] Accurate and analogous emissions data across the entire energy landscape is essential to support informed decision making whether in the procurement context or elsewhere. Indeed, as the Commission and

[12] Formal Case No. 874, *In the Matter of the Gas Acquisition Strategies of District of Columbia Natural Gas, a Division of Washington Gas Light Company* and Formal Case 1167, Order No. 22395 (March 27, 2025).
[13] Formal Case No. 874 and Formal Case 1167, Order No. 22395

stakeholders engage with Washington Gas' and Pepco's respective 15-Year Plans, and consider any eventual emissions reduction activities proposed by either company, they must do so using comparable information about the associated emissions savings. To account for upstream and downstream emissions from only the electric system, or only the gas system, would distort the reality of the District's progress on its climate commitments.

Evaluating emissions for both the natural gas and electric supply chains is also critical, given that many jurisdictions are taking a fresh look at electrification feasibility, due in large part to concerns regarding affordability, electric grid capacity, and doubts regarding actual greenhouse gas emissions reductions from electric generation.[14] For example, on January 22, 2024, the California Public Utilities Commission rejected Southern California Edison Company's proposed building electrification programs.[15] In its decision, the California Commission noted that it "has the statutory duty to establish just and reasonable rates so Californians have access to affordable electricity that is essential for their health, safety, and wellbeing," and that the "proposed programs fail to sufficiently show clear customer benefits in the face of certain costs."[16] The California Commission also rejected the programs in part due to "unreliable estimates of GHG emissions reductions and marginal GHG abatement costs."[17]

The District is also almost entirely reliant on imported electricity, and the upstream

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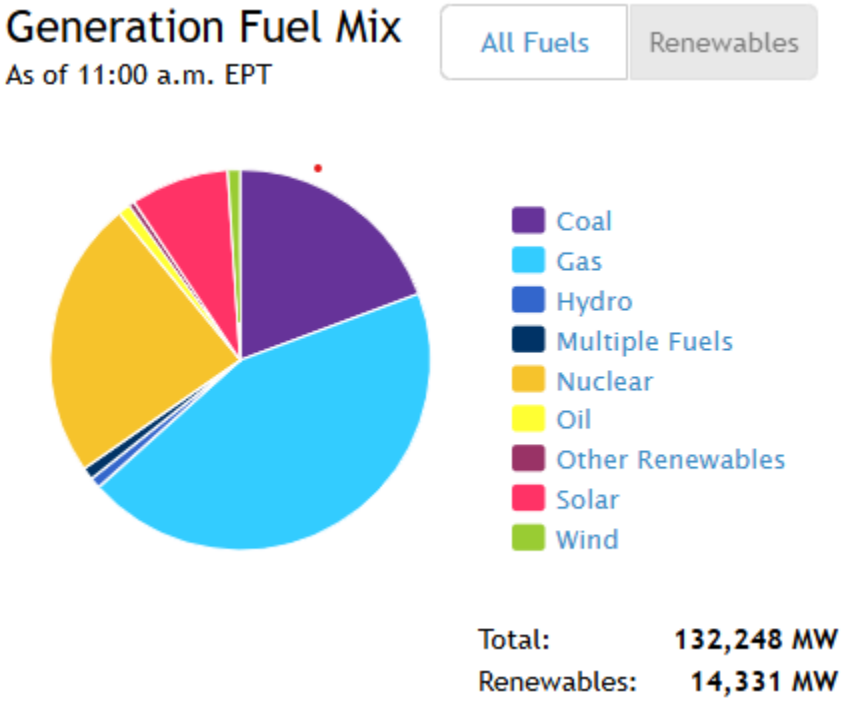
[14] *See e.g.* Batra et. al, *Rising Current: America's Growing Electricity Demand* at 13 (June 9, 2025) ("Fossil fuel-based generation will also remain an important part of the capacity needed to meet rising electricity demand through 2050, with natural gas expected to account for 19% of installed capacity.").

[15] California Public Utilities Commission, Decision 24-01-004, *Decision on Southern California Edison Company Proposed Building Electrification Programs* (Jan. 22, 2024).

[16] *Id.* at 1.

[17] *Id.*

PJM generation mix from which it pulls remains heavily dependent on fossil fuels. For example, as of 11:00 a.m. on July 24, 2025, PJM's generation mix consisted of 11% of renewable energy, whereas gas, coal, and oil combined made up over 64% of the generation mix, as shown below:[18]



PJM's reliance on fossil fuels for electric generation is not likely to change in the near term.[19] Indeed, in Maryland, the operator of two coal- and oil-fired power plants has agreed to keep those plants running past their planned retirement date to avoid blackouts

[18] PJM, *Markets & Operations*, (July 24, 2025), https://www.pjm.com/markets-and-operations.aspx. Notably, the marginal carbon dioxide emissions rate for PJM generation during this period was over 1151 lb/MW, which is about 2.9 times more than the U.S. Energy Information Administration's carbon dioxide emissions coefficient for natural gas combustion in homes and businesses. *See* PJM, Hourly Marginal Emissions (July 24, 2025) https://dataminer2.pjm.com/feed/hourly_marginal_emissions/definition; EIA, Carbon Dioxide Emissions Coefficients (July 24, 2025) https://www.eia.gov/environment/emissions/co2_vol_mass.php; EIA, Energy Conversion Calculators (July 24, 2025) https://www.eia.gov/energyexplained/units-and-calculators/energy-conversion-calculators.php.

[19] Moreover, the District is typically a net importer of electricity. Pennsylvania and West Virginia are the net export states that the Mid-Atlantic relies on to provide power to balance such shortfalls. Pennsylvania and West Virginia currently rely heavily on natural gas and coal generation. *See* PJM - State Net Import/Export Map (Hourly).

in the Baltimore area. Talen Energy's recent agreement to extend operations at its 1.3-GW coal-fired Brandon Shores power plant and 774-MW oil-fired H.A. Wagner units until May 31, 2029, under a reliability-must-run contract is just one example of this state of affairs.[20] Both facilities were originally scheduled to retire in May 2025.[21]

In short, if the Commission seeks to develop minimum emissions reporting requirements for the natural gas supply chain, Washington Gas supports setting comparable metrics for reporting electric upstream emissions, including those relating to the procurement of fuel for electric generation (including the fuel source), the electric generation process, as well as any emissions associated with the electric transmission, and distribution lifecycle.

C. IF REPORTING IS REQUIRED, WASHINGTON GAS RECOMMENDS REPORTING CRITERIA CONSISTENT WITH WHAT WAS PROVIDED IN ITS 15-YEAR PLAN.

In considering upstream and downstream reporting criteria for the natural gas system[22], Washington Gas suggests that the Commission follow an approach similar to that used in the Company's 15-Year Plan filing.[23] As discussed in further detail below, the Company's approach in the 15-Year Plan sought to balance providing sufficiently granular and supportable data with feasibility, particularly given limited data availability from upstream suppliers. Washington Gas reiterates, consistent with the GPWG Initial Report,

[20] Sonal Patel, *Talen, PJM Reach Agreement to Keep 2 GW of Coal, Oil Generation Online for Reliability in Maryland*, POWER (Jan. 29, 2025), https://www.powermag.com/talen-pjm-reach-agreement-to-keep-2-gw-of-coal-oil-generation-online-for-reliability-in-maryland/.

[21] *Id.*

[22] As it did in the 15-Year Plan, Washington Gas does not propose specific criteria for quantifying the emissions associated with the electric system, except to note its support for comparable emission reporting across both systems.

[23] FC 1167, Washington Gas's 15-Year Plan (June 9, 2025)

that more detailed information regarding the specific emissions associated with each molecule in the system is not feasible at this time and, more importantly, does not provide additional useful information beyond what the 15-Year Plan approach provides.

1. Summary of the Company's Emissions Reporting Approach and Criteria in the 15-Year Plan.

In developing its 15-Year Plan, the Company quantified and reported certain Scope 3 emissions associated with its operations.[24] While Scope 3 can be defined in a variety of ways, for the purposes of Washington Gas's 15-Year Plan, Scope 3 emissions included both end-user combustion ("downstream") as well as emissions associated with gas imported into Washington Gas's distribution system ("upstream gas").[25]

a. Combustion Emissions

Washington Gas's end-user combustion emissions were estimated using the U.S. Environmental Protection Agency ("EPA") emissions factors provided in 40 C.F.R. Part 98, Subpart NN, and include methane and nitrous oxide components. Specifically, end-user combustion emissions were calculated by multiplying the total throughput for the District by applicable emission factors. Methane and nitrous oxide components were converted to carbon dioxide equivalents ("CO2e") using the Intergovernmental Panel on Climate Change ("IPCC") AR6 100-Year global warming potentials ("GWP").[26] The GWPs, combustion emissions factors, and formulas supporting the Company's calculations are provided below.

GWPs:

[24] FC 1167, Washington Gas's 15-Year Plan (June 9, 2025)
[25] Note that the term "upstream gas" refers to gas imports into Washington Gas's distribution system.
[26] Available at: Microsoft Word - Global-Warming-Potential-Values.docx

$$CO_2e\ (kg) = CO_2(kg) * GWP\ (CO_2) + CH_4(kg) * GWP\ (CH_4) + N_2O(kg) * GWP\ (N_2O)$$

GHG	AR6 100-Year
CO_2	1
CH_4	27
N_2O	273

Combustion Emissions Factors:

CO_2 (kg CO_2/MMBtu)	**CH_4 (kg CH_4/MMBtu)**	**N_2O (kg N_2O/MMBtu)**	**CO_2e (kg CO_2/MMBtu)**
53.06	0.001	0.0001	53.11

Source: Greenhouse Gas Inventory Guidance: Direct Emissions from Stationary Combustion Sources Appendix A-Table A-3

Combustion Emissions Formulas:

$$CO_2, CH_4, N_2O\ (kg) = Volume\ (Mcf) * Heating\ Value\ \left(\frac{MMBTu}{Mcf}\right) * Emission\ Factor\ \left(kg\ \frac{CO_2, CH_4, N_2O}{MMBtu}\right)$$

b. Upstream Emissions

Upstream emissions from the energy system are indirect emissions related to the production and transportation of the fuel. For Washington Gas, upstream emissions are related to the production and transportation of natural gas to its distribution system.[27] For electric utilities, upstream emissions could include those associated with the production and transportation of fuel (e.g., natural gas) to generation facilities.

The Company used basin-specific emissions factors from a study by the National Energy Technology Laboratory ("NETL") [28] to calculate upstream gas emissions in its 15-

[27] Upstream gas emissions include processing, transmission, storage, pipeline, production, and gathering and boosting emissions associated with natural gas. Included within these emissions are upstream leaks, venting, and flaring at natural gas wells.
[28] noi

Year Plan. Based on Washington Gas' procurement schedules, as presented in FC874, it procures gas from three sources:

- Appalachian shale
- Gulf of Mexico
- Certified Natural Gas ("CtNG")

Emissions associated with natural gas delivered from each of these sources were computed in the Company's 15-Year Plan using the same methodology, but use source-specific emission factors, corresponding to the source and quantity procured. The Appalachian shale and Gulf Coast Conventional production emission factors reported in the NETL Study were converted to account for the use of the AR5 20-Year GWP by the NETL Study and AR-6 100-Year GWP used in the 15-Year Plan. An estimate of gas distribution emissions was also removed from the NETL Study emissions factors because gas distribution-related emissions for Washington Gas are captured in Scope 1 emissions. Emission factors associated with upstream CtNG were assumed to be the same as the Appalachian shale basin, less the methane intensity difference on the production emissions, provided by the CtNG certification process. Specifically, upstream gas emissions in Washington Gas' 15-Year Plan are calculated by multiplying the quantity of gas procured from each source by the applicable emission factors, as shown below. Consistent with end-user combustion, methane and nitrous oxide components are converted to CO2e using the IPCC AR6 100-Year GWPs.

Upstream Emissions:

$$CO_2, CH_4, N_2O\ (kg) = Volume\ (Mcf) * Heating\ Value\ \left(\frac{MMBtu}{Mcf}\right) *$$

$$Emission\ Factor\left(g\frac{CO_2, CH_4, N_2O}{MJ}\right) * Conversion\ \left(\frac{MJ}{MMBtu}\right) * Conversion(\frac{g}{kg})$$

Upstream Emissions Factors:

(g/MJ)	Gulf-Conventional Basin	Appalachian Shale Basin	CtNG
CO_2	10.79	10.66	10.66
CH_4	0.288	0.125	0.116
N_2O	0.0001	0.0001	0.0001
CO_2e	18.6	14.1	13.8

Source: National Energy Technology Laboratory, Life Cycle Analysis of Natural Gas Extraction and Power Generation, April 19, 2019

The Company acknowledges that actual upstream gas emissions are affected by many factors, such as the operations at specific wells, the distance the gas travels on upstream pipelines, and the specific upstream pipelines used to transport the gas. At this time, however, if the Commission decides to set minimum emissions reporting criteria regarding the energy supply chain, Washington Gas recommends using estimates such as a basin-specific approach using the factors from the NETL Study (or any updates thereto), similar to what was used in its 15-Year Plan.

2. Approach to Accounting for Scope 3 Upstream Emissions Associated with Other Fuels

Scope 3 upstream emissions can also include emissions from the production and transportation of other fuels such as coal, oil, renewable natural gas ("RNG"), and

hydrogen. In the 15-Year Plan, Washington Gas proposed a lifecycle emissions approach to calculate upstream emissions associated with other fuels. Washington Gas calculated emissions associated with RNG in its 15-Year Plan using a lifecycle emissions approach, which means the emissions factors account for the avoided emissions from capturing methane gas from organic waste sources before it is emitted into the atmosphere and include emissions associated with combustion. When calculating lifecycle emissions reporting for alternative fuels, it is critical to ensure there is no double-counting associated with the combustion emissions (i.e., if a lifecycle approach is used, the emissions associated with combusting the fuel is included in the lifecycle calculations, so separate combustion emissions associated with end-use should not be calculated).

RNG can be produced from a variety of feedstocks. Common RNG feedstocks, such as landfill gas, food waste, and wastewater, have differing emission profiles. Washington Gas' 15-Year Plan emission rate assumptions for each feedstock are provided below.

GHG Emissions Rates by Feedstock:

Feedstock	GHG Emissions Rate (lb. CO2e/MMBtu)
Food Waste	21.00
Wastewater	(9.90)
Landfill Gas	16.60
Average	9.23

In Washington Gas' 15-Year Plan, the Company used the average emission rate of the three feedstocks to compute the emissions associated with RNG as a potential emissions reduction option. While this is the approach used in the Company's 15-Year

Plan, any emission reporting requirements associated with actual RNG purchases would be refined (e.g., based on the specific type of feedstock purchased), if necessary, in the context of the Commission's approval of Washington Gas implementing an RNG program.

The Company believes it is premature to define a methodology to quantify emissions associated with hydrogen given the current state of the market. However, it is the Company's understanding that emissions associated with hydrogen vary depending on the method of hydrogen production. For example, if hydrogen is produced using renewable resources, the emissions associated with its generation would likely be close to zero. Likewise, the emissions associated with the combustion of hydrogen would also be quantified as zero. The Company will continue to monitor developments in the hydrogen market as well as the progression of hydrogen technology over the coming years and provide relevant updates in the Company's 15-Year Plan. Washington Gas suggests that reporting criteria associated with hydrogen be refined in the context of the Commission approving a hydrogen program.

While the Company does not distribute other fuels, such as coal and oil, it is important to note that the upstream and downstream emissions associated with the production, transportation, and use of those fuels and any other fuels should be accurately captured in the District's emissions accounting.

D. THE COMPANY'S EMISSIONS REPORTING IN THE 15-YEAR PLAN IS CONSISTENT WITH REPORTING IN OTHER STATES.

Reporting requirements associated with Scope 3 emissions are being discussed in various jurisdictions across the country. Several have identified the importance of

quantifying Scope 3 emissions, but few have developed specific requirements or timelines at this time. California and New York are among the leaders, but reporting is not yet required in these states.[29] Reporting upstream emissions is still a nascent concept and therefore, industry and states are still largely developing reporting criteria. Still, the GHG emissions reporting for Scope 3 as employed in the Company's 15-Year Plan aligns with the industry's current best practices and methodologies that are being discussed in other jurisdictions.

The Scope 3 emissions reported in the Company's 15-Year Plan are consistent with the Scope 3 emission quantification approaches proposed by New York's natural gas utilities for the state's GHG Emission Inventory.[30] New York's proposed quantification of Scope 3 emissions includes the same two components: end user combustion and upstream gas (also known as imported gas). End user combustion is computed using the same subpart NN factors described above. The imported gas is calculated using the same basin-specific approach based on the NETL Study referenced above. One notable difference that complicates comparisons of results is that New York requires CO2e calculations to be based on a 20-year GWP, whereas the District typically uses a 100-year GWP value in its reporting. The inclusion of end user combustion and upstream emissions for natural gas utilities is also consistent with California's consideration of Scope 3 emissions reporting.[31] Washington Gas believes the inclusion of both combustion and upstream fuel emissions provides a more complete understanding of Scope 3 emissions while also aligning with best practices in other jurisdictions.

[29] Required reporting of Scope 3 emissions begins in 2027 in California and 2028 in New York.
[30] Docket 22-M-0149, JU GHG Inventory Supplement 05.31.2023, May 31, 2023. Pending Commission approval.
[31] Greenhouse Gas Protocol, Technical Guidance for Calculation Scope 3 Emissions (version 1.0).

While Washington Gas is focused on emissions associated with its operations, the Company again notes the importance of quantifying parallel Scope 3 emissions associated with electricity to ensure a more accurate portrayal of emissions for the District. This includes emissions associated with the combustion of fuels during electric generation, as well as upstream fuel emissions associated with fuel production and transportation to the generator. In PJM, these upstream fuel emissions could include, but are not limited to, emissions associated with the production and transportation of fuel used in generation, such as coal, oil, natural gas, and nuclear fuel. Both New York and California plan to include quantifying upstream fuel emissions for electric generation in Scope 3 emissions reporting.[32] As noted above, accurately quantifying Scope 3 emissions for the District must include accounting for upstream fuel emissions across both the electric and gas sectors.

CONCLUSION

For the reasons enumerated above, Washington Gas respectfully requests that the Commission integrate this and other various emissions reporting obligations into Formal Case 1167. Furthermore, the Company requests that if the Commission ultimately determines it is appropriate to set minimum emissions reporting criteria for energy supplies, it adopts an approach similar to Washington Gas' 15-Year Plan filing, and as it

[32] Energy Sector Greenhouse Gas Emissions Under the New York State Climate Act: 1990-2020, December 2022, p. 45; Greenhouse Gas Protocol, Technical Guidance for Calculation Scope 3 Emissions (version 1.0), p. 7.

correctly identified in the NOI, sets similar metrics and reporting requirements for both the natural gas and electric systems.

Respectfully submitted,

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

WASHINGTON GAS LIGHT COMPANY

July 25, 2025

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 25th 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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