



September 5, 2025

VIA ELECTRONIC FILING

Brinda Westbrook-Sedgwick
Commission Secretary
Public Service Commission
of the District of Columbia
1325 G Street, NW, Suite 800
Washington, DC 20005

Re: Formal Case No. 1167, In the Matter of the Implementation of Electric and Natural Gas Climate Change Proposals

Dear Brinda Westbrook-Sedgwick:

Attached for filing please find Sierra Club's *Initial Comments on Washington Gas Light Company's 15-Year Plan*. Thank you for your attention to this matter.

Should you have any questions, please contact me at toberleiton@earthjustice.org.

Sincerely,

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**BEFORE THE PUBLIC SERVICE COMMISSION
OF THE DISTRICT OF COLUMBIA**

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|---------------------------------------|---|-----------------------------|
| IN THE MATTER OF |) | |
| THE IMPLEMENTATION OF ELECTRIC |) | Formal Case No. 1167 |
| AND NATURAL GAS CLIMATE |) | |
| CHANGE PROPOSALS |) | |

**SIERRA CLUB’S INITIAL COMMENTS ON
WASHINGTON GAS LIGHT COMPANY’S 15-YEAR PLAN**

Pursuant to Order No. 22313,¹ Order No. 22339,² and Order No. 22699³ of the Public Service Commission for the District of Columbia (“Commission”), the Sierra Club submits its initial comments in response to Washington Gas Light Company’s (“WGL” or the “Company”) 15-Year “Plan.”⁴

The Commission directed WGL “to demonstrate . . . how they will meet the District’s climate goals over the next 15 years.”⁵ WGL’s filing does not meet that requirement, nor sufficiently address the showings required in Order No. 22313.⁶ In its 15-Year “Plan,” WGL concedes that the vast majority of emissions related to the use of its product are Scope 3 emissions, to the tune of 94 percent.⁷ Yet instead of addressing solutions to reduce that outsized emissions impact, WGL essentially throws its hands up and states “those emissions are not controlled by the Company.”⁸ WGL otherwise proposes a framework and programs that will

¹ *Formal Case No. 1167, In the Matter of the Implementation of Electric and Natural Gas Climate Change Proposals* (“*Formal Case No. 1167*”), Order No. 22313, rel. Oct. 10, 2024.

² *Formal Case No. 1167*, Order No. 22339, rel. Dec. 10, 2024.

³ *Formal Case No. 1167*, Order No. 22699, rel. Aug. 8, 2025.

⁴ *Formal Case No. 1167*, Washington Gas Light Company’s 15-Year Plan, filed June 9, 2025 (“15-Year ‘Plan’”).

⁵ Order No. 22313 at ¶ 1 (emphasis added).

⁶ Order No. 22313 at ¶ 20.

⁷ 15-Year “Plan” at 18-19.

⁸ *Id.* at 18.

have only marginal impacts on WGL’s emissions, and largely mirrors its proposals that it made over five (5) years ago in its 2020 Climate Business Plan (“2020 CBP”).

The Commission has recognized—and continues to recognize—the unambiguous directives of District law and policy to significantly reduce emissions by phasing out combustion of fossil fuels. WGL is simply opting out of being a meaningful part of achieving those mandates, and the Commission should reject WGL’s filing outright.

At the outset, WGL clarifies that it believes it is not obligated to comply with any of DC’s binding climate laws, explicitly stating that DC climate law “does not create any binding obligations for Washington Gas.”⁹ Despite the Commission stating it will use its full authority to limit WGL’s emissions impacts, as is required under DC law,¹⁰ WGL incorrectly views its Congressional Charter as providing the Company an unfettered right to sell gas in the District, free from any regulatory action that will directly or indirectly result in decreased gas usage. In this sense, WGL’s 15-year “Plan” is consistent with the Company’s out-of-touch view of District law, policy, and this Commission’s regulatory authority over WGL’s operations. WGL’s 15-Year “Plan” reads more like a promotional pamphlet for its business-as-usual approach to deliver dirty fossil fuels with little to no curtailment, with numerous misleading narratives on several false climate solutions, such as “certified gas” and “renewable natural gas.” Further, WGL perpetuates the myth that continued delivery of fossil fuel is affordable compared to electrification, which is inaccurate, particularly given WGL’s out-of-control spending on its accelerated pipeline replacement programs (“APRP”) through PROJECT*pipes* and District “SAFE.”

⁹ *Id.* at 6.

¹⁰ *Formal Case No. 1167*, Order No. 21593 at ¶ 9, rel. April 6, 2023.

Those high-level critiques notwithstanding, if the Commission does not reject WGL's proposed 15-Year "Plan" outright, Sierra Club respectfully submits that appropriate review of WGL's 15-Year "Plan" requires scrutiny beyond initial and reply comments, with the need for discovery and competing expert analysis of the quantitative inputs, analyses, and outputs contained in the 15-Year "Plan" and appendices. The proposals and supporting data presented in WGL's 15-Year "Plan" are cursory, untested, and unactionable by the Commission at this time. As WGL concedes, the Company anticipates needing to submit additional detailed filings following the completion of the Commission's Benefit Cost Analysis ("BCA"):

[T]he Company's anticipated next steps will be to evaluate and incorporate stakeholder feedback into detailed program proposals for certain emission reduction options. Those detailed program proposals will include specific program costs and associated cost recovery, action plans, milestones and forecasted emissions reductions to be achieved.¹¹

Given the cursory and untested nature of WGL's claims in its 15-Year "Plan," none of its data, analyses, or conclusions should be credited by the Commission at this time.

For the foregoing reasons, the Sierra Club urges the Commission to reject WGL's 15-Year "Plan" and take no immediate action on this filing, or alternatively, re-examine WGL's proposals in the context of the thermal planning process currently under consideration.

I. PROCEDURAL HISTORY

Over five (5) years ago, on March 16, 2020, WGL filed its 2020 CBP¹² pursuant to Term No. 79 of the AltaGas, Ltd. ("AltaGas") Merger Settlement Agreement.¹³ To ensure effective

¹¹ WGL 15-Year "Plan" at 55.

¹² *Formal Case No. 1142, In the Matter of the Merger of AltaGas, Ltd. and WGL Holdings, Inc.* ("Formal Case No. 1142"), Washington Gas, Climate Business Plan for Washington D.C., filed Mar. 16, 2020.

¹³ *Formal Case No. 1142*, Consent Motion to Reopen the Record in Formal Case No. 1142 to Allow for Consideration of Unanimous Full Settlement Agreement and Stipulation, and to Waive Hearing on Proposed Settlement, filed May 8, 2018.

stakeholder input on the CBP, on November 18, 2020, and in response to, *inter alia*, the Sierra Club’s *Request to Institute an Evidentiary Proceeding regarding WGL’s Climate Business Plan*, the Commission opened *Formal Case No. 1167* to commence a climate policy proceeding to consider “whether and to what extent utility or energy companies under our purview are meeting and advancing the District’s energy and climate goals.”¹⁴

In Order No. 20754, the Commission established “next steps” for the proceeding, requiring parties to file electrification studies, and requiring WGL “to file the workpapers, models and related projections that support all scenarios provided in the Climate Business Plan, including the Policy Driven Electrification scenario.”¹⁵ In response, on September 1, 2021, WGL made what it called a “compliance filing,” which purported to contain WGL’s explanation of how the Fuel Neutral Decarbonization Scenario in the CBP would provide safe, reliable, affordable, and sustainable natural gas distribution service in the District; detailed projections, models, and assumptions related to the four scenarios included in the CBP; and the work papers, models, and projections that support all scenarios in the CBP.¹⁶ WGL then filed a 5-year plan, the Climate Change Action Program, Part 1¹⁷ and a 30-year plan, the Climate Change Action Roadmap, Part 2 (collectively, “Post-CBP Plans”).¹⁸ WGL later filed an amendment to its Climate Change Action Program, Part 1, on October 26, 2022.¹⁹ On July 1, 2022, Sierra Club

¹⁴ *Formal Case No. 1142 and Formal Case No. 1167*, Order No. 20662, at ¶ 1, rel. Nov. 18, 2020.

¹⁵ *Formal Case No. 1142 and Formal Case No. 1167*, Order No. 20754, at ¶ 1, rel. June 4, 2021.

¹⁶ *Formal Case No. 1167*, AltaGas Ltd.’s and Washington Gas Light Company’s Filing in Compliance with the Directives Set Forth in Paragraph 46 of Commission Order No. 20754, filed September 1, 2021.

¹⁷ *Formal Case No. 1167*, Washington Gas Light Company’s Climate Change Action Program, Part 1, filed December 15, 2021.

¹⁸ *Formal Case No. 1167*, Washington Gas Light Company’s Climate Change Action Roadmap, Part 2, filed January 18, 2022.

¹⁹ *Formal Case No. 1167*, Revision to Climate Change Action Program – Part 1, filed October 26, 2022.

and other parties filed consolidated comments on WGL’s 2021 Compliance Filing and WGL’s Post-CBP Plans.²⁰

On August 5, 2024, WGL filed a document called “Proposal to Implement the District of Columbia’s Climate Goals,” asking for Commission approval of four (4) projects. In response, on August 19, 2024, OPC filed a *Motion for Status* to set a procedural schedule for determination of WGL’s CBP and August 5, 2024 proposals.²¹

In Order No. 22313, the Commission, *inter alia*, rejected WGL’s request for project approvals.²² The Commission noted the nature of WGL’s filings, indicating that the CBP was designed to “provide the Commission and stakeholders with WGL’s *vision* of how to mitigate climate change and its effects.”²³ The Commission also recognized that in the subsequently filed 5-year Plan, WGL proposed various *potential* projects, and that in WGL’s 30-year Climate Change Action Roadmap Part 2, the Company “takes a longer view of the role of *potential* alternative gaseous fuels in the future.”²⁴ The Commission went on to note that WGL’s 2020 CBP and subsequent 5- and 30-year plans were ostensibly designed to comply with then-existing District climate policies and goals.²⁵ However, as recognized by the Commission, the District has since adopted legislation that significantly affected the District’s climate actions and delineated policy approaches to reaching those mandates. This legislation includes:

- **The Climate Commitment Amendment Act of 2022**, which requires DC to reduce greenhouse gas emissions by no less than 60% relative to 2006 levels by 2030 and to reach carbon neutrality by 2045,²⁶ requires the District government to

²⁰ *Formal Case No. 1167*, Sierra Club, Comments Regarding Washington Gas Light Company’s Climate Change Proposals, filed July 1, 2022.

²¹ *Formal Case No. 1167*, OPC, Motion for Status, filed August 19, 2024.

²² Order No. 22313 at ¶ 3.

²³ *Id.* at ¶ 13 (emphasis added).

²⁴ *Id.* at ¶ 14 (emphasis added).

²⁵ *Id.* at ¶ 15.

²⁶ D.C. Code § 8–151.09(d).

reach carbon neutrality for emissions associated with government operations by 2040, prohibits the District government from installing fossil fuel-burning space- or water-heating appliances beginning in 2025, and requires the District government to purchase or lease only zero-emissions vehicles beginning in 2026, thus taking many municipal gas users off the gas system.

- **The Clean Energy DC Building Code Amendment Act of 2022**,²⁷ which establishes standards for new buildings and major renovations to be built to net zero standards starting after 2026; prohibits fossil fuels in new construction, except as backup generation sources in buildings that are essential to public health and safety; and sets a minimum percentage of total building energy consumption to be met by on-site renewable generation, as required by Appendix Z to the District of Columbia’s Energy Conservation Code.
- **The Local Solar Expansion Amendment Act of 2022**,²⁸ which increases the renewable portfolio standard (“RPS”) from 10% to 15% by 2041 for solar projects eligible for the Solar Renewable Energy Certificate (“SREC”) carve-out component of the District’s RPS program.
- **Healthy Homes and Residential Electrification Act of 2024 (“Healthy Homes Act”)**,²⁹ requiring DOEE to provide no-cost residential electrification retrofits to 30,000 low-income households.

WGL filed its 15-Year “Plan” on June 9, 2025. Sierra Club now files the instant Initial Comments.

II. COMMENTS

Over five (5) years after the filing of its 2020 CBP, despite the passage of these significant pieces of climate legislation, WGL seems no closer to realizing that its business-as-usual approach is inconsistent with District law and District government policies that will move the District away from fossil fuel combustion. Instead of taking these binding statutory requirements seriously, WGL here instead regurgitates the same “solutions” that it proposed five years ago in the 2020 CBP and purportedly “supported” in its 5-year and 30-year filings.

²⁷ D. C. Code § 6–1453.01D.C. Law 4-177, effective September 21, 2022.

²⁸ D.C. Code § 34-1432(c).

²⁹ Law No. 25-0189 (June 19, 2024).

WGL’s 5-Year Plan proposed funding gas appliance upgrades to tether ratepayers to the gas system under the guise of energy efficiency, combined heat and power, infrastructure spending focused on costly APRP, limited advanced leak detection, methane capture and reinjection, and sourcing from CG, RNG, and hydrogen. WGL’s 30-Year Roadmap merely doubled down on the 2020 CBP’s Fuel Neutral Decarbonization Scenario, and provided little additional information regarding the programs proposed in its 5-Year Plan. Now, WGL 15-Year “Plan” repeats much of the same information it filed in its 2020 CBP, 5-Year Plan, and 30-Year Roadmap, not showing much—if any—progress over the past 5 years.

WGL’s proposals are even more insufficient now than they were 5 years ago. On June 4, 2021, pursuant to paragraph 46 of Order No. 20754,³⁰ WGL was required to submit a filing with the following parameters:

- . . . explain how the Fuel Neutral Decarbonization scenario in the Climate Business Plan would provide safe, reliable, affordable, and sustainable natural gas distribution service in the District consistent with the Commission’s statutory mandates, Clean Energy DC, Climate Ready DC, and the Revised Vision Statement.
- ...include a robust cost benefit analysis of the Fuel Neutral Decarbonization scenario, the assumptions underlying the models, the workpapers to support these assumptions, and indicate the impacts of this scenario on natural gas distribution customers (including the effect on default gas customers) and members of disadvantaged communities.
- ...detailed list of individual proposed projects that WGL has already filed or intends to file to implement its scenario and both short- (5 year) and long-term (30 year) timelines for filing project proposals.
- ...detailed projections, models and assumptions related to the following projects as discussed in the Climate Business Plan: (a) introduction of certified natural gas into the distribution system; (b) introduction of renewable natural gas into the distribution system; and (c) electric grid storage or Tier one renewable resources projects

³⁰ *Formal Case No. 1167*, Order No. 20754 at ¶ 46, rel. June 4, 2021

in addition to those envisioned under Term No. 5 of the Formal Case No. 1142 Settlement Agreement.

- ...estimate of the required investment for each project and the proposed regulatory treatment of such costs.

WGL made that filing on September 1, 2021. Shortly after, parties and Sierra Club filed responses calling into question WGL's assumptions, data, analyses, and conclusions on nearly all of WGL's plans. And since then, not much has changed—WGL has had numerous opportunities to accept the reality that gas demand will decline over the coming decades, WGL has failed to even examine the ramifications of that reality on its customers, and WGL has otherwise failed to propose meaningful emissions reduction programs. When WGL sought to move forward with four (4) of its proposed programs, including incentives for alternative fuels, in August of 2023, the Commission soundly rejected those plans. WGL's 15-Year "Plan" is no different and should be rejected by this Commission.

A. WGL's Demand Forecasting is Vastly Out of Step with Regional Projections

WGL appears unwilling to accept the basic premise that gas sales are largely expected to decline between now and 2045, which will result in stranded assets on WGL's system. In Maryland, a study performed by Energy and Environmental Economics ("E3") for Baltimore Gas & Electric ("BGE") painted a *conservative* picture of declining gas sales over the next 20 years, with sales "reductions ranging between 54% and 70% in 2045 relative to 2020."³¹ This study projects, "[f]ocusing just on all gas delivered via BGE's pipeline, gas throughput declines [of] 60% -78% in 2045 relative to today."³² BGE recognized that "[a]ll the decarbonization

³¹ Maryland Public Service Commission Case No. 9692, *In the Matter of Baltimore Gas and Electric Company's Application for an Electric and Gas Multi-Year Plan*, BGE Integrated Decarbonization Strategy Report at 25 (October 2022) ("E3 Study"), available at https://www.ethree.com/wp-content/uploads/2022/10/BGE-Integrated-Decarbonization-White-Paper_2022-11-04.pdf

³² *Id.*, (emphasis added).

scenarios evaluated by E3 in this study envision a transformation in the way buildings are heated,” which includes “an emphasis on electrification as the core engine of building heating decarbonization,”³³ and modeled that “by 2050, 94% of homes in BGE’s service territory are electrically heated.”³⁴

Yet, WGL’s 15-Year Base Forecast states “that demand for the Residential, Commercial, and other segments will remain flat during the 15-Year “Plan”—that is, from now until 2040. WGL claims that for this estimate, it “assumes that all existing programs, regulations, and laws remain in place.” These figures are questionable at best, since current District law will require:

- all District government operations be carbon neutral by 2040;
- that District Government cease purchasing combustion vehicles and operating buildings with combustion on site;
- that new constructions and substantial renovations will prohibit on-site fuel combustion starting in 2027; and
- that 30,000 low-income households will be fully-electrified through the Healthy Homes Act. That accounts for nearly 10 % of all DC households and over 18% of WGL’s 163,000 DC customer base, and, as per WGL, about one-third of its residential customers.³⁵

WGL’s assumptions, data, and analysis are not only patently self-serving, but are faulty beyond serious consideration.

B. WGL’s Emissions Reduction Options are False Climate Solutions and Will Only Marginally Reduce Emissions.

1. Fugitive emissions should be curtailed, but WGL’s proposed methods are overly costly and guarantee stranded assets

Sierra Club agrees that while the gas distribution system is in place, it should generate as few fugitive emissions as possible. Thus far, WGL has failed to abate fugitive emissions after

³³ *Id.*

³⁴ *Id.* at 21.

³⁵ WGL 15-Year “Plan” at 13.

nearly a decade of bloated APRP spending, which has only served to generate return on capital for AltaGas shareholders with little benefit for District ratepayers. Over the years, intervenor testimony—and two management audits—have shown that WGL has underperformed and overspent on boondoggle replacements. WGL now touts its replacement activities and its “updated” District “SAFE” plan, which is currently under consideration in Formal Case No. 1179, as emissions reduction efforts.³⁶ However, as has been pointed out by various intervenor witnesses, District “SAFE” is no different than WGL’s business-as-usual approach, and continues WGL’s unwillingness to consider any alternatives to wholesale replacements, such as targeted repairs of actual leaky pipes. As WGL states, its fugitive emissions as of 2023 were 78,000 MT CO₂e—which is only 6.3 percent of its overall 1,235,438 MT CO₂e emissions. Put another way, the 1,155,414 MT CO₂e in Scope 3 emissions from the end-use combustion of WGL’s delivered gas is 1,381.3 percent higher than WGL’s fugitive emissions. For WGL to tout its APRP as a meaningful emissions reduction program is specious at best, particularly considering the exorbitant cost to achieve fugitive emissions reductions through replacements. WGL should instead commit to pursuing pipeline repair and other non-pipeline alternatives, rather than the costlier pipeline replacements it is proposing through District SAFE.

2. Washington Gas’ proposed energy efficiency programs are merely efforts to lock consumers into relying on gas appliances, resulting in marginal emissions benefits and stranded assets as users exit the system.

WGL continues to press its efforts to provide utility-direct incentives for gas appliances to ratepayers, despite the D.C. Sustainable Energy Utility (“DCSEU”) phasing out incentives for gas appliances in August of 2021. Perpetuating the combustion of methane gas in buildings directly undercuts the District’s ability to achieve the steep emission reductions required under its binding climate laws. WGL’s proposed so-called “energy efficiency” programs would directly

³⁶ WGL 15-Year “Plan” at 19-21.

compete with DCSEU’s electrification efforts and thus work against the District’s climate objectives. Replaced gas appliances and dual-fuel heat pump systems will perpetuate reliance on climate-harming methane gas during a period where most users are exiting the system. Each replacement today locks a given user into paying for gas as prices rise due to decreased demand over an increasingly smaller ratepayer pool. WGL’s analysis in its 15-Year “Plan” filing fails to account for this rate impact and should be disregarded. Further, the Commission should give no weight to WGL’s statement that its previously filed energy efficiency proposals “would have produced 114,000 MT CO₂e of emissions reductions.”³⁷ That emissions figure—and its underlying assumptions, data, analyses, and conclusions—are untested and are otherwise years out of date. Further, the information contained in the 15-Year “Plan’s” Appendix C: Energy Efficiency” should be subject to technical scrutiny beyond comments and reply comments.

3. Dual-fuel heating systems are not a viable emissions reduction solution, as they continue customers’ reliance on a costly gas delivery system.

WGL makes a cursory conclusion that the gas-burning function of a dual-fuel heating system provides “a secondary, but important, benefit of providing a gas backup for the coldest days of the year.”³⁸ WGL suggests that its costly and aging gas infrastructure—mains and services—should be left in place, maintained, or replaced in the event of the *possibility* that users may use gas for the coldest days of the year. However, WGL provides no basis for maintaining this costly hybrid equipment in a mild climate where heat pumps can meet DC residents’ needs year-round. As with its energy efficiency proposals, maintaining a gas backup will keep ratepayers tethered to the gas system and subject them to spiking gas rates from now through 2045. Further, WGL’s analysis does not accurately reflect the ability of conventional air source

³⁷ *Id.* at 21.

³⁸ *Id.* at 37.

heat pumps—let alone ground source or modern cold-climate air source heat pumps³⁹— to meet even the coldest weather demands, as has been proven in much colder climates than DC. If it does not reject WGL’s 15-Year “Plan” outright, the Commission should alternatively allow parties the opportunity to challenge WGL’s faulty analyses in the thermal planning docket.

4. RNG continues to be short in supply, expensive, and too variable in emissions impact to be credited as an emissions reduction solution.

WGL continues to press the false “solutions” being proffered by the gas industry as alleged “climate-friendly” gas-based alternatives to electrification. Intervenors have shown over and over, across multiple dockets, that these types of fuels do not meaningfully reduce emissions. Indeed, the Commission rejected WGL’s requests for preliminary funding for these measures in Formal Case No. 1169.

RNG fails as a climate solution because it has wildly variable emissions that are sometimes higher than those of fossil gas, is in extremely limited supply and thus very expensive compared to electrification, and still results in greenhouse gas emissions when combusted. RNG is a term used by the gas industry to describe biogas, which refers to methane derived from biogenic (organic) sources such as landfills, sewage treatment facilities, forests, livestock operations, and farms. Biogas is produced through either anaerobic digestion or thermal gasification.⁴⁰ Each of these different sources of RNG comes with varying emissions profiles, but regardless of its source, there are dire emissions risks associated with leaks of this substance

³⁹ New York State, NYS Clean Heat, *Do Heat Pumps Really Work in Cold Climates?* Available at <https://cleanheat.ny.gov/heat-pumps-cold-climates-do-they-work/>; Earthjustice, *Make Your Home Cleaner and Comfier with a Heat Pump* (March 27, 2025), available at <https://earthjustice.org/feature/heat-pump-heating-cooling-benefits>; Rewiring America, *Do heat pumps work in cold climates? The answer is short and simple: Yes!* Available at <https://homes.rewiringamerica.org/articles/heating-and-cooling/heat-pumps-cold-weather>

⁴⁰ Natural Resources Defense Council, *A Pipe Dream of Climate Solution? The Opportunities and Limits of Biogas and Synthetic Gas to Replace Fossil Gas*, at 2 (June, 2020), <https://www.nrdc.org/sites/default/files/pipe-dream-climate-solution-bio-synthetic-gas-ib.pdf>

in the distribution system, since methane has a 20-year global warming potential that is 82.5 times that of carbon dioxide.⁴¹ Further, RNG supplies are currently very limited and unlikely to grow substantially in the future⁴²—a concern that has been acknowledged by the American Gas Association (“AGA”).⁴³ Despite these realities, an internal set of American Gas Association (“AGA”) meeting notes from March 2018 shows the industry determined that RNG can be used to “mitigate the opposition’s fervor” to phase out the burning of gas due to climate concerns, highlighting that utilities’ plans to ostensibly utilize RNG are simply disingenuous greenwashing.

5. CNG is still combustible gas resulting in the same emissions as non-CNG

WGL claims that its CNG purchasing has “increased from approximately 0.5% of total purchases for the District in 2021 to approximately 10% in 2024.”⁴⁴ Yet, attempts to utilize “certified gas” in procurement should be curtailed because this is another false climate solution. Certified gas purports to have emission-reducing potential because it adheres to so-called “best practices”—but these practices are still connected with the environmentally disastrous practice of extracting fracked methane gas at the gas well. There are no established standards for this certification process, and indeed in July of 2023, the federal Department of Energy announced

⁴¹ IPCC WGI, *Climate Change 2021: The Physical Science Basis*, at 7-125, IPCC AR6 WGI (2021), https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_Full_Report.pdf.

⁴² *Earthjustice & Sierra Club, Rhetoric v. Reality: The Myth of “Renewable Natural Gas” for Building Decarbonization* (July 2020), available at https://earthjustice.org/wp-content/uploads/report_building-decarbonization-2020.pdf

⁴³ American Gas Association, *APGA Basecamp 2018*, at 615 (2018), <https://www.documentcloud.org/documents/6768592-APGABasecamp-2018.html#document/p615/a549439>; see also Susie Cagle, *US gas utility funds ‘front’ consumer group to fight natural gas bans*, The Guardian (July 26, 2019), <https://www.theguardian.com/us-news/2019/jul/26/us-natural-gas-ban-socalgas-berkeley>.

⁴⁴ WGL 15-Year “Plan” at 15.

plans to halt endorsement of standards regarding certified gas.⁴⁵ Overall lifecycle emissions of different types of certified gas vary substantially and certified gas is still methane gas, possessing all the same emissions associated with leaks in transport and distribution as other fracked gas, as well as the same greenhouse gas emissions when it is combusted. The Commission should give credence to this unregulated certification process and stop WGL's utilization of CNG.

6. Advanced leak detection ("ALD") is a vital tool that must be utilized effectively and more often on WGL's system

Sierra Club encourages the continued refinement and use of ALD technology to identify actual leaks for repair on WGL's distribution system. As noted above, Sierra Club requests the ability to probe and test WGL's assumptions, data, analyses, and conclusions on ALD and other topics presented in the 15-Year "Plan." Further, ALD is currently being discussed in the context of Formal Case No. 1178 through a series of technical conferences, which will yield more information to support the utilization of ALD as a proactive method to identify and repair leaks on WGL's system in lieu of costly wholesale replacements of large segments of pipe.

⁴⁵ Corey Paul & Maya Weber, *US DOE will not develop certified natural gas standard amid focus on international emissions framework*, S&P Global (July 21, 2023), <https://www.spglobal.com/commodityinsights/en/market-insights/latest-news/natural-gas/072123-us-doe-will-not-develop-certified-natural-gas-standard-amid-focus-on-international-emissions-framework>

III. CONCLUSION

WHEREFORE, for the reasons stated above, Sierra Club respectfully requests that the Commission reject WGL's filing, or, in the alternative, allow for discovery on WGL's filing and workpapers and testimony by intervening parties in the thermal planning process.

Dated: September 5, 2025

Respectfully submitted,



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CERTIFICATE OF SERVICE

I hereby certify that on this September 5, 2025, a copy of the foregoing was served on the following parties by electronic mail:

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