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November 20, 2025

VIA ELECTRONIC MAIL

Deborah Moss
Senior Associate Legal Counsel
Washington Gas Light Company (WGL)
1000 Maine Avenue, SW Suite 700
Washington, DC 20024
Deborah.Moss@washgas.com

Re: PEPPOR-2025-01/WGPOR-2025-01

Dear Deborah Moss:

Pursuant to Section 122 of the Rules of Practice and Procedure for the District of Columbia Public Service Commission, the Commission hereby submits to WGL the attached Data Request No. 1. Please file your response with the Office of the Commission Secretary no later than COB December 05, 2025. As appropriate, please file confidential and public versions of such data request responses.

These requests are continuing in nature. Consequently, WGL must supplement its answers if additional information becomes available or if previously submitted information changes. The Commission reserves the right to propound follow-up or additional data requests, if necessary. Thank you for your immediate attention to this matter. If you have any questions regarding this request, please contact Timour Skrynnikov at (202) 626-9172.

Sincerely,

Timour Skrynnikov

Senior Financial Analyst

Enclosure

cc: Brinda Westbrook-Sedgwick
Poorani Ramachandran
Gillian Marime

PEPPOR-2025-01/WGPOR-2025-01
Commission Data Request No. 1 to WGL
November 20, 2025

All information responses should ONLY be provided in searchable PDF, DOC or EXCEL (with all formulas intact) files via email or electronic media. If a response has already been provided by another party, please reference the date and data request number to aid retrieval. If data requested is online, please provide the detailed URL as an operable link.

- (1) Please refer to WGL's September 2, 2025, Initial Comments to the Notice of Inquiry (NOI) PEPPOR-2025-01/WGPOR-2025-01, Question b: "Should the POR Discount Rate calculation be modified? If yes, explain how it should be modified for Residential, Small Commercial, and Large Commercial Customers, and why?" In response to question b, WGL stated that:

"WGL believes the POR discount rate calculation is appropriate as it is currently conducted, with the exception of netting late fees against bad debt expense. Late fees are part of the revenues included in the Company's base rate cases in Washington Gas Company 2024 POR Annual Update and Tariff filed on determining the Company's base rates. Including late fees as an offset to bad debt expense in the POR discount rate calculation double counts those late fees."

Also reference WGL's FC1180 Direct Testimony of Witness Tuoriniemi, page 44, **lines 6-9, and 15-16** which states in part that:

"Adjustment 7D—Purchase of Receivables removes all of the amounts included in the test year that are recovered from competitive gas suppliers relating to the purchase of receivables, which was approved in Formal Case No. 1140."

"As reflected in the table below, for items related to revenues, I am removing discount rate revenues received from the competitive gas suppliers and the late payment fees on the purchased receivables, which total \$1,097,063."

- (a) The Commission designed the WGL and PEPCO POR programs to be self-contained with all revenues and expenses contained therein. Witness Tuoriniemi's direct testimony in FC 1180 describes the removal of all POR expenses and revenues (including late payment fees) in Adjustment 7D. Please explain how including late fees as an offset to bad debt expense in the POR discount rate double counts those revenues.
- (b) If this is not WGL's position, please explain the Company's position in detail.
- (2) Please refer to WGL's September 2, 2025, Initial Comments to the Notice of Inquiry (NOI) PEPPOR-2025-01/WGPOR-2025-01, Question c. How should the Commission direct Pepco or Washington Gas to treat existing and future under-collections and over-collections? In response to Question C, WGL indicates that:

"If the Commission is inclined to continue with the POR program, it could consider lengthening the period over which the Company recovers its current under-collection."

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Approximately 45% of the total proposed discount rate is related to prior period under-recoveries. If uncollectibles remain steady or decline, lengthening the period over which the current under-recovery is paid, the proposed discount rate could be somewhat mitigated. However, if uncollectable rates climb or there are fewer billed commodity sales than anticipated, lengthening the period over which the under-collection is paid may serve to exacerbate the problem.”

- (a) Please provide an illustrative example using actual data that shows the step-by-step calculation of a multi-year amortization approach, showing the discount rate, the uncollectible balances, the annual amortization amount and the compensation for carrying costs.
 - (b) What does WGL propose would be a reasonable carrying costs for uncollected balance if the amortization approach is adopted by the Commission.
 - (c) Over what period of time does WGL propose for the amortization.
 - (d) If the uncollectible rate does not decrease or increases from its current level, would Pepco continue to recommend amortization of the uncollectible balance.
- (3) For Residential POR customers, please provide a list of Third-Party Suppliers (TPS) enrolled in the POR Program including: 1) number of Residential POR customers and 2) number of Residential POR customers with uncollectable accounts for each Third-Party Supplier for CY 2024, CY2023 and CY 2022. Please use the following table format to provide information for each of the years.

#	Name of Third-Party Gas Supplier (TPS) enrolled in POR program	CY2024 Number of POR Residential Customers	CY 2024 Number of POR Res. Customers with arrears/ uncollectable accounts	CY2023 Number of POR Residential Customers	CY 2023 Number of POR Res. Customers with arrears/ uncollectable accounts	CY2022 Number of POR Residential Customers	CY 2022 Number of POR Res. Customers with arrears/ uncollectable accounts
1	Name 1	XX	XX	XX	XX	XX	XX
2	Name 2	XX	XX	XX	XX	XX	XX
3	Name 3	XX	XX	XX	XX	XX	XX
4	Name 4	XX	XX	XX	XX	XX	XX
	Total	XX	XX	XX	XX	XX	XX

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- (4) For Non-residential POR customers, please provide a list of Third-Party Supplier (TPS) enrolled in the POR Program including: 1) Number of Non-residential POR customers and 2) Number of Non-residential POR customers with uncollectable accounts for each Third-Party Supplier for CY 2024, CY2023 and CY 2022. Please use the following table format to provide information for each of the years.

#	Name of Third-Party Supplier enrolled in POR program	CY2024 Number of POR Non-Residential Customers	CY 2024 Number of POR Non-Res. Customers with arrears/ uncollectable accounts	CY2023 Number of POR Non-Residential Customers	CY 2023 Number of POR Non-Res. Customers with arrears/ uncollectable accounts	CY2022 Number of POR Non-Residential Customers	CY 2022 Number of POR Non-Res. Customers with arrears/ uncollectable accounts
1	Name 1	XX	XX	XX	XX	XX	XX
2	Name 2	XX	XX	XX	XX	XX	XX
3	Name 3	XX	XX	XX	XX	XX	XX
4	Name 4	XX	XX	XX	XX	XX	XX
	Total	XX	XX	XX	XX	XX	XX