

December 17, 2025

**VIA ELECTRONIC FILING**

Brinda Westbrook-Sedgwick  
Commission Secretary  
Public Service Commission  
of the District of Columbia  
1325 "G" Street, NW, 8<sup>th</sup> Floor  
Washington, D.C. 20005

**Re: Formal Case No. 1154  
[Application for Limited Reconsideration]**

Dear Ms. Westbrook-Sedgwick:

Attached hereto please find Washington Gas Light Company's Application for Limited Reconsideration in the above-referenced matter,

Please do not hesitate to contact me if you have questions regarding this matter.

Sincerely,



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

cc: Per Certificate of Service

IN THE MATTER OF )  
 )  
 )  
 WASHINGTON GAS LIGHT COMPANY'S )  
 APPLICATION FOR APPROVAL OF )  
 PROJECT *PIPES* 2 PLAN )  
 )  
 ) Formal Case No. 1154  
 )

Pursuant to D.C. Code § 34-604 and 15 DCMR § 140.1, Washington Gas Light Company (“Washington Gas” or “Company”) hereby submits its Application for Limited Reconsideration of Order No. 22746, issued on November 26, 2025 in the above-captioned proceeding. For the reasons discussed herein, Washington Gas requests that the Public Service Commission of the District of Columbia (“Commission”) reconsider that portion of its order directing Washington Gas to limit construction and surcharge recovery to projects appearing on the Company’s 2025 Project List. The directives referenced above as set forth in Order No. 22746 are grounded upon an inadvertent factual error that the Commission can easily correct.

Order No. 22746 assumes that carryover projects alone will sustain the Company's PIPES 2 work through June 30, 2026 and will allow the Company to retain and sustain Operator Qualified ("OQ") construction crews through the extension period. As discussed below, the Company seeks to clarify the record evidence in this matter as it relates to the projects started under prior project lists

and anticipated to continue into 2026. Washington Gas shows herein that 2025 carryover projects are likely to conclude by the end of March 2026, resulting in the reallocation of nearly 70% of OQ construction crews from the District to Maryland and Virginia, or the loss of such crews to off-system work. Thus, Washington Gas respectfully asks the Commission to reconsider limiting PIPES 2 activity through June 30, 2026 to projects on a previously approved list, and instead authorize the Company to include a subset of previously identified, projects sufficient to sustain qualified resources within the \$25 million approved spend during the extension period ending June 30, 2026.

In support of this application, Washington Gas submits as follows:

#### **I. STANDARD OF REVIEW**

The standards governing applications for reconsideration of Commission orders are well settled. The sole “purpose” of an application for reconsideration “is to identify errors of law or fact in the Commission’s initial Order so that they can be corrected.”<sup>1</sup> The Commission’s regulations require that applications for reconsideration or modification of a Commission decision or order specifically provide the grounds on which the order or decision is considered to be unlawful or erroneous.<sup>2</sup> The party seeking reconsideration must show that the challenged portions of the order were unreasonable, arbitrary, or capricious by demonstrating clearly and convincingly a fatal flaw in the action taken.”<sup>3</sup>

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<sup>1</sup> Formal Case No. 1154, *In the Matter of Washington Gas Light Company’s Application for Approval of PROJECTpipes 2 Plan* (“Formal Case No. 1154” or “PIPES 2”), Order No. 21982, ¶ 8 (rel. Apr. 24, 2024).

<sup>2</sup> 15 DCMR § 140.2.

<sup>3</sup> Formal Case No. 1144, *In the Matter of the Potomac Electric Power Company’s Notice to Construct Two 230kV Underground Circuits from the Takoma Substation to the Rebuilt Harvard*

## II. DISCUSSION

As discussed below, an updated analysis of the record evidence—*i.e.*, the volume of 2025 carryover projects already completed and the balance of 2025 carryover projects workable in the first half of 2026—suggests that the limitation on project activity included in Order No. 22746 will disrupt the continuity that the Commission recognized and sought to preserve in that same order. To wit, Washington Gas estimates it will need to reassign 10 of 15 OQ construction crews performing accelerated pipeline replacement work by June 30, 2026 if the Company is limited to advancing only 2025 carryover projects during the extension period. If the OQ crews cannot be assigned to Maryland or Virginia projects the Company may well lose those crews to other gas companies or off-system work. This concern can be resolved by recalling continuity in the context of the Company's extension request.

### A. The Importance of Continuity

On October 15, 2025 Washington Gas submitted its Motion for Extension of PIPES 2, and the PROJECT*pipes* surcharge, through June 30, 2026, stressing the need for *continuity* across a number of considerations.<sup>4</sup> First, Washington Gas noted in that filing that “the Company is proposing to work on Commission-approved replacement projects that have not yet been completed *or work on replacing eligible pipe material under one of the approved PIPES 2 programs.*”<sup>5</sup>

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*Substation, and from the Rebuilt Harvard Substation to the Rebuilt Champlain Substation* (Capital Grid Project), Order No. 20235, ¶ 9, rel. October 11, 2019. See also, D.C. Code § 34-606 (2001). *Bell Atl. Washington, D.C., Inc. v. Pub. Serv. Comm'n*, 655 A.2d 1231, 1233 (D.C. 1995).

<sup>4</sup> Formal Case No. 1154, Washington Gas Motion for Extension (filed Oct. 15, 2025).

<sup>5</sup> *Id.* at 5 (emphasis supplied).

Thus, the Company stressed continuity from the perspective of finishing carryover projects *and* replacing additional infrastructure eligible under PIPES 2.

Next, Washington Gas explained that not extending PIPES 2 “is not in the public interest because the accelerated replacement program addresses aging infrastructure that presents a higher risk profile, something the Commission has recognized, ‘could result in safety and reliability issues as well as increased GHG emissions.’”<sup>6</sup> Here Washington Gas stressed continuity in safety, reliability and emissions mitigation.

The Company further offered that failure to extend PIPES 2 by six months would jeopardize continuity in maintaining a sufficient corps of operator-qualified construction crews.<sup>7</sup> Washington Gas thus noted the safety and employment impacts attendant to crew continuity.

Finally, Washington Gas stressed the prejudicial impact on District customers from an interruption in the PIPES 2 program, who rely on the Company to follow its obligations under the D.C. Code to provide safe, reliable and secure natural gas service, and to follow the Company’s corresponding duty to meet its federal obligation to remove aging pipe on an accelerated basis.<sup>8</sup> Extending PIPES 2 for six months assured continuity for the Company’s to meet its District and federal safety commitments.

Washington Gas reiterates the foregoing points to respectively remind the

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<sup>6</sup> *Id.* at 6.

<sup>7</sup> *Id.*

<sup>8</sup> *Id.* at 7, citing D.C. Code § 34-1101 (2024) and the Letter from Zach Garrett, Director State Programs, Pipeline and Hazardous Materials Safety Administration, to Emile C. Thompson, Chairman, Public Service Commission of the District of Columbia (May 13, 2024) (available at DCPSC E-Docket System under Case Number PSE2024-01-G).

Commission that the principal basis for the Company's requested extension of PIPES 2 was and remains continuity. This includes continuity of the materials eligible for replacement, continuity in safety and reliability, continuity in OQ workforce, and continuity in meeting the Company's legal obligations. Washington Gas respectfully suggests that the Commission's decision to extend PIPES 2 recognized and relied upon all the aforementioned elements of continuity.<sup>9</sup>

#### **B. Washington Gas' Updated Analysis of Record Evidence.**

By this Application, Washington Gas seeks reconsideration of only one directive in Order No. 22746 that warrants reexamination by the Commission. Specifically, Washington Gas seeks reconsideration to the extent the Commission relied on record evidence to conclude that approval of carryover projects from 2025 were sufficient to occupy Washington Gas through June 30, 2026. Washington Gas respectfully clarifies that this is not the case based on its updated analysis.

As the Commission is aware, utility infrastructure projects require a significant amount of pre-construction activity (design, permitting) and closeout activities (final restoration/final invoicing) that inherently create timing differences between when construction crews are utilized to perform work and when restoration/trailing invoices are processed such that all costs are recognized.<sup>10</sup> The

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<sup>9</sup> See, e.g., Formal Case No. 1154, Order No. 22746, ¶ 13 ("Ending PIPES 2 before we have issued a decision in District SAFE would undermine the continued replacement of these types of high-risk pipelines, and critical, already-approved work should be completed to ensure system safety and reliability. Further, absent an extension, the Company has indicated it will begin redeploying or releasing qualified gas construction crews. The Commission is sensitive to both the loss of Operator Qualified technicians not easily replaced, as well as the prospect of layoffs of District workers during a stressed economy. Avoiding workflow disruption will also allow seamless permitting, customer notification, and construction of ongoing remediations.") (footnotes omitted).

<sup>10</sup> "Trailing invoicing" refers to the typical delay between field activities and the time frame it takes to a vendor to submit charges, company to review for accuracy, and ultimately payment. On a \$50

Company seeks to sustain a sufficient volume of work for OQ construction crews to maintain continuity with field construction during the extension period, but cannot do so give the actual construction status of 2025 carryover projects.

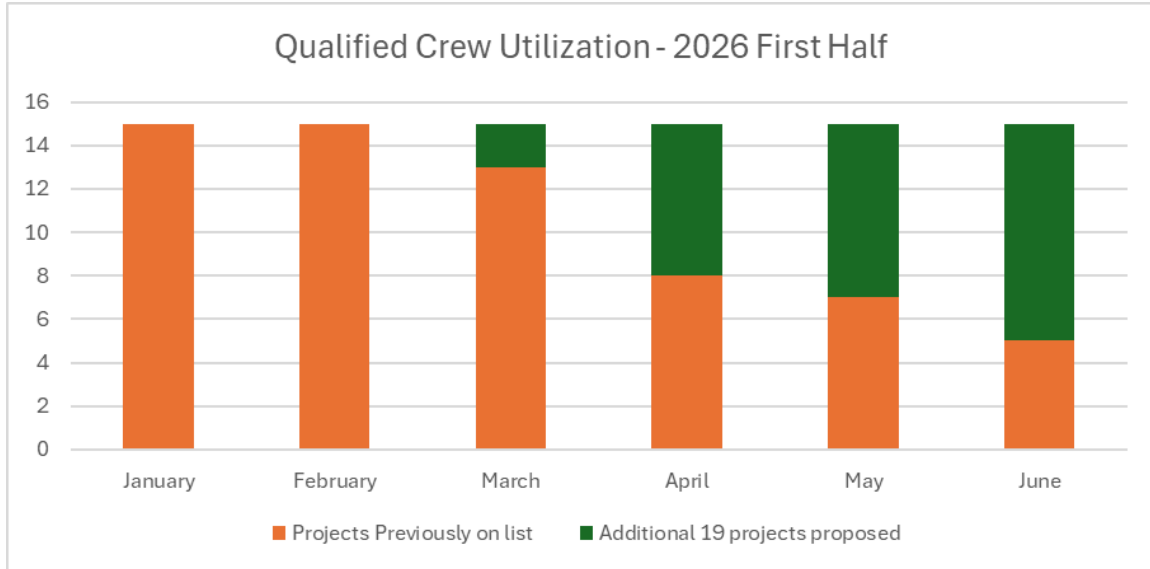
For example the Company's most recent 2025 project list anticipated that approximately 85 projects would extend into 2026, *i.e.*, carryover projects. While costs associated with previously approved projects will represent a significant portion of the money included within the rider surcharge in the first half of 2026, the Company's current assessment of the record evidence in this matter shows that many (if not most) of the 2025 carryover projects have little to no further work required by OQ construction crews. Rather, these remaining carryover projects are in the process of final restoration and invoicing. Consequently, 2025 carryover projects cannot sustain the continuity of OQ construction crews through June 2026, which continuity concerns significantly informed Order No. 22746.

As shown in Figure 1, below, absent the inclusion of other program-eligible projects, the Company anticipates workforce disruptions starting in late March, as previously approved projects reach completion of gas piping activities. Figure 1 also shows that, if continuity is left unaddressed, Washington Gas will need to shift 10 of 15 OQ crews – nearly 70% of its APRP workforce – out of the District starting in April of 2026, or risk losing them altogether to off-system competition. And Figure 1 shows that supplementing the extension project list with previously identified, program-eligible projects supports maintenance of the 10 at-risk crews in the District.

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million annual rate of investment, it is normal that \$6-10 million of "trailing invoicing" related to work already performed is in progress at any given point in time.

**Figure 1.**



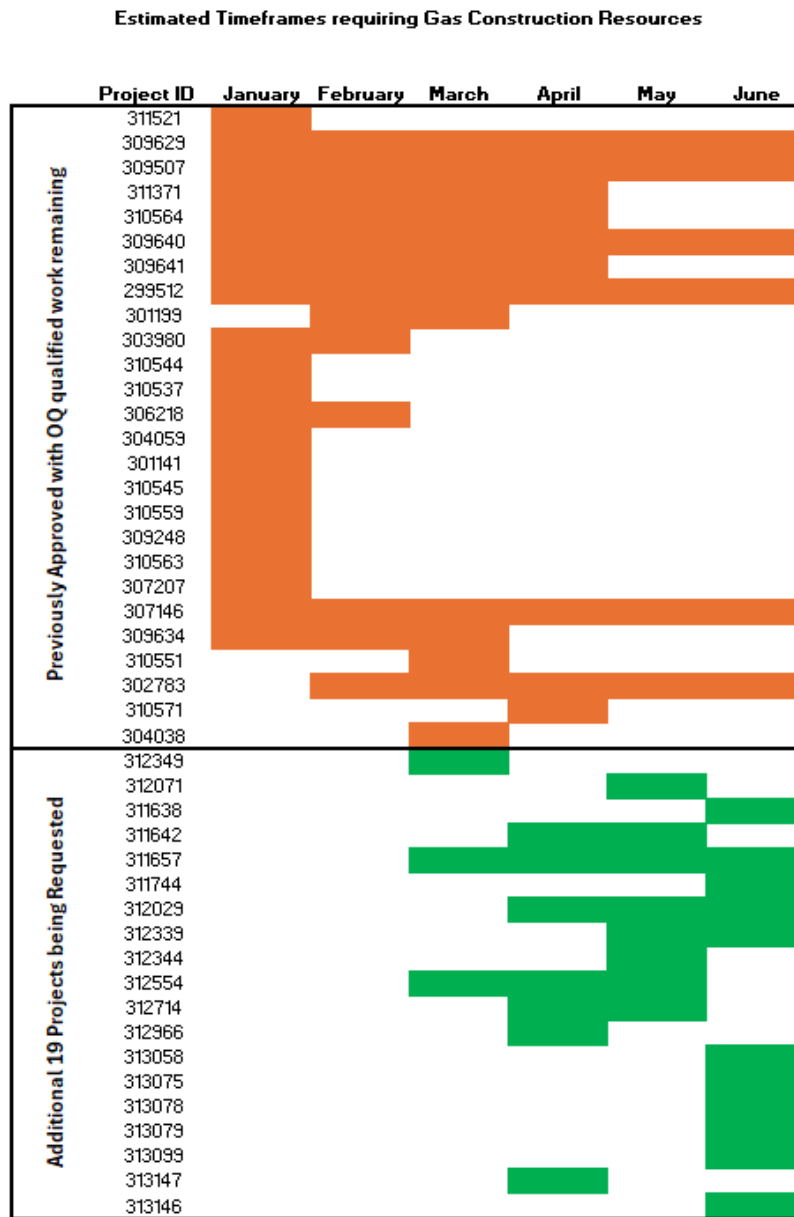
By virtue of this limited reconsideration request, Washington Gas is seeking approval to include in the 2026 extension project list 19 previously identified projects<sup>11</sup> that need to be started before the end of June 2026 in order to maintain continuity. Figure 2 below shows the cadence and duration of work for 2025 carryover projects (in orange) as well as the 19 projects previously identified in the record that Washington Gas proposes to commence as 2025 carryover work winds down (in green). A list of the 19 previously identified projects—in a similar form and format as they were submitted on prior project lists—is appended hereto as Attachment A.<sup>12</sup> Washington Gas commits to limit spending on and surcharge recovery of the 2026 costs incurred on the 19 program-eligible projects within the Commission’s approved spend of \$25 million, thereby meeting other parties’ spend

<sup>11</sup> Formal Case No. 1154, WGL 2026 Annual Project List through June 30, 2026 (filed Oct. 31, 2025).

<sup>12</sup> Attachment A includes the annualized estimated costs originally filed with the Commission. The Company anticipates spending approximately \$1.99 million on the 19 program-eligible programs from January 1, 2026 through June 30, 2026.

concerns.<sup>13</sup>

**Figure 2.**



Note: Indicative Schedule of approximately when a given project is currently anticipated to utilize OQ qualified field resources. Excludes Projects with Paving only or final invoicing in process.

Figure 2 demonstrates that Washington Gas has successfully completed or advanced beyond gas piping activity more 2025 carryover projects than reflected

<sup>13</sup> Order No. 22476, ¶¶ 15-16.

in the facts upon which the Commission relied in Order No. 22746. Figure 2 also shows that adding a limited number of previously identified program-eligible projects will allow the Company to continue accelerated pipeline replacement work in the District to keep OQ constructions occupied in the District through June 30, 2026. Consequently, to ensure continuity in accelerated replacement of degrading pipes, the Commission should reconsider limiting Washington Gas to working only on 2025 carryover projects.

### **III. CONCLUSION**

Washington Gas respectfully requests that the Commission reconsider its directive in Order No. 22746 to limit work conducted through June 2026 to 2025 carryover projects. The Company respectfully requests that the Commission allow the Company to include 19 previously identified projects on its 2026 extension project list to preserve continuity of accelerated pipeline replacement in the District, in conformance with the Commission's concerns as expressed in Order No. 22746. Washington Gas will cap its expenditures and surcharge recovery on the total number of projects worked through June 30, 2026 to \$25 million, consistent with Order No. 22746.

Respectfully submitted,



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

pc: Per Certificate of Service

# **ATTACHMENT A**

Subset of 19 Projects Submitted on CY 2026 Project List

Note: The Company estimates to spend approximately \$1.99 million between January 1, 2025 and June 30, 2026 on the 19 projects listed below.

Note: All project costing and timing data represent estimates based upon the best data available at the time. Many unknown factors outside the control of WG will impact both the cost and timing of each specific project, items such as projects by others in the area, permitting fees, and timing.

BCA	PROJECT NAME / LOCATION	WARD	PROGRAM	TOTAL PROJECT SCOPE											PROJECT ORIGINATION	COMMENT	
				MAIN ABANDONMENT (FT)				MAIN INSTALLATION (FT)					AFFECTED SERVICES	EST. EFVs			TOTAL ESTIMATED PROJECT COST
				CAST IRON	BARE/ UNPROTECTED WRAPPED STEEL	VINTAGE MECHANICALLY COUPLED (VMC) STEEL	CONTINGENT MAIN	2"	4"	6"	8"	12" OR LARGER					
311638	DC 17th St NE - E006NE - Ward 5 - ABDN Only	5	Program 4	4,347	0	0	46	0	0	0	0	0	0	0	\$720,490	Risk/Leak Based; JANA Total Mitigatable Risk: 231475 - Total Mitigated Risk per \$10K: 3212	
311642	DC APRP 4 - Connecticut Ave NW - J011NW - Ward 3 - MNABD	3	Program 4	2,950	0	0	371	0	0	0	0	0	6	5	\$496,198	Risk/Leak Based; JANA Total Mitigatable Risk: 259753 - Total Mitigated Risk per \$10K: 5234	See Notes 6 & 7
311657	DC - 13th St NE - C006NE - Ward 5	5	Program 2	0	670	0	0	720	0	0	0	0	16	16	\$1,243,524	Field Ops Requested	See Notes 3 & 6
311744	DC L St NW - C003NW3 - WARD 2 - ABDN Only	2	Program 4	1,476	0	0	0	0	0	0	0	0	0	0	\$350,062	Risk/Leak Based; JANA Total Mitigatable Risk: 123961 - Total Mitigated Risk per \$10K: 3541	See Note 6
312029	DC Bunker Hill Rd NE - E008NE - WARD 5	5	Program 4	13,743	4,555	0	2,718	15,750	0	0	0	0	406	406	\$27,148,467	Risk/Leak Based; JANA Total Mitigatable Risk: 2885581 - Total Mitigated Risk per \$10K: 1062	See Notes 6 & 7
312071	DC 37th St SE - H004SE - Ward 8 - ABDN Only	8	Program 4	518	0	0	0	0	0	0	0	0	0	0	\$148,663	Risk/Leak Based; JANA Total Mitigatable Risk: 59725 - Total Mitigated Risk per \$10K: 4017	
312339	DC 16th St NW - D006NW - WARD 1 - ABDN Only	1	Program 4	2,085	0	0	250	0	0	0	0	0	3	3	\$411,958	Risk/Leak Based; JANA Total Mitigatable Risk: 165490 - Total Mitigated Risk per \$10K: 4017	See Notes 6 & 7
312344	DC 13th St NW - C006NW3 - Ward 1 - ABDN Only	1	Program 4	1,465	0	0	0	0	0	0	0	0	0	0	\$327,718	Risk/Leak Based; JANA Total Mitigatable Risk: 131092 - Total Mitigated Risk per \$10K: 4000	See Notes 6 & 7
312349	DC Wisconsin Ave NW - K011NW - Ward 3 - ABDN Only	3	Program 4	712	450	0	0	0	0	0	0	0	0	0	\$192,145	Risk/Leak Based; JANA Total Mitigatable Risk: 25839 - Total Mitigated Risk per \$10K: 1344	See Note 7
312554	DC APRP 2 - Upton St NW - J008NW - WARD 3	3	Program 2	0	463	0	0	439	0	0	0	0	8	7	\$698,321	Field Ops Requested	See Notes 6 & 7
312714	DC F.O. - APRP 4 - 17th St NE - E005NE - Ward 5	5	Program 4	20	0	0	0	195	0	0	0	20	0	0	\$477,937	Field Ops Requested	See Note 3
312966	DC F.O. - APRP 4 - Kennedy St NW - A010NW2 - Ward 4	4	Program 4	20	0	0	0	0	0	0	0	20	0	0	\$251,368	Field Ops Requested	See Note 3
313058	DC APRP 4 - Hawthorne St NW - L006NW - WARD 3 - MNABD	3	Program 4	945	0	0	0	0	0	0	0	0	1	0	\$355,798	Risk/Leak Based; JANA Total Mitigatable Risk: 134280 - Total Mitigated Risk per \$10K: 3774	See Notes 6 & 7
313075	DC APRP 4 - Buchanan St NW - ABDN Only - Ward 4	4	Program 4	488	0	0	0	0	0	0	0	0	0	0	\$327,718	Risk/Leak Based; JANA Total Mitigatable Risk: 123931 - Total Mitigated Risk per \$10K: 3781	See Notes 6 & 7
313078	DC APRP 4 - Sheridan St NW - B012NW4 - Ward 4 - ABDN Only	4	Program 4	450	0	0	0	0	0	0	0	0	1	1	\$355,798	Risk/Leak Based; JANA Total Mitigatable Risk: 118445 - Total Mitigated Risk per \$10K: 3328	See Notes 6 & 7
313079	DC APRP 4 - Connecticut AVE NW - ABD ONLY - Ward 3	3	Program 4	2,166	137	0	104	0	200	0	0	0	5	5	\$1,209,068	Risk/Leak Based; JANA Total Mitigatable Risk: 175985 - Total Mitigated Risk per \$10K: 1456	See Notes 6 & 7
313099	DC APRP 4 - 16th St NW - ABDN Only	2	Program 4	1,677	0	0	0	0	0	0	0	0	0	0	\$327,718	Risk/Leak Based; JANA Total Mitigatable Risk: 107795 - Total Mitigated Risk per \$10K: 3289	See Notes 6 & 7
313146	DC APRP 4 - 14th St SE - ABDN Only - ward 7	7	Program 4	293	0	0	0	0	0	0	0	0	0	0	\$327,718	Risk/Leak Based; JANA Total Mitigatable Risk: 119391 - Total Mitigated Risk per \$10K: 3643	See Notes 6 & 7
313147	DC APRP 4 - Connecticut Ave NW - J010NW - Ward 3 - ABDN Only	3	Program 4	3,400	0	0	0	0	0	0	0	0	2	2	\$383,878	Risk/Leak Based; JANA Total Mitigatable Risk: 412714 - Total Mitigated Risk per \$10K: 10751	See Notes 6 & 7

Notes:

- 1 A place holder for estimated services anticipated to experience active leaks necessitating replacement, aka "scattered," during the period was included.
- 2 Project schedule dependent upon DDOT's anticipated construction schedule.
- 3 Projects were not selected nor prioritized based upon Risk Score.
- 5 This project schedule has been revised due to coordination issues with DC Water and DDOT.
- 6 This estimate is based on unit cost estimates or a preliminary class III estimate, not a final class III estimate. A final class III will be provided upon completion of the project design.
- 7 Project Scope and estimated units are not based upon a completed design.
- 8 BCA will be broken into multiple phases. The estimate provided corresponds to only that of phase one.
- 9 Service replacement projects correspond to the leak rate per area.
- 10 The estimated project cost during the period is attributed to previously completed units.
- 11 This project is pipe complete. The estimated project cost is associated with the paving and restoration activities remaining.
- 12 This project starting in 2024 is contingent on timing of work compelled by others, as such no schedule has been finalized nor qualified resources identified currently.
- 13 This project is included in the CY2026 project list in anticipation of project closeout activities.
- 14 Revised Schedule, Scope and Spend to accommodate Advanced Leak Detection (ALD) results.

## **CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on this 17<sup>th</sup> day of December 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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JOHN C. DODGE