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**December 18, 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](mailto: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. 2. Please file your response with the Office of the Commission Secretary no later than COB January 06, 2026. 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 Felix Otiji at [fotiji@psc.dc.gov](mailto:fotiji@psc.dc.gov).

Sincerely,

**Felix Otiji**

Senior Accountant

Enclosure

cc: Brinda Westbrook-Sedgwick  
Poorani Ramachandran  
Gillian Marime

PEPPOR-2025-01/WGPOR-2025-01  
Commission Data Request No. 2 to WGL  
December 19, 2025

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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 Energy's September 26, 2025, Reply 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 its Reply Comments, WGL Energy stated that:

*"A more equitable solution would establish discount rates based on the utility's overall experience with uncollectible accounts from a specific supplier, while implementing true-up mechanisms that adjust payments based on the actual collection performance of each supplier's customer base. This approach would create appropriate incentives for suppliers to maintain high-quality customer portfolios while ensuring collection costs are allocated to the parties who directly cause them. Suppliers with consistently higher-than-average uncollectible rates would face additional charges through the true-up process, while suppliers demonstrating superior customer management would receive credits. Additionally, to have an effective POR program, third-party suppliers require better visibility into customer payments made directly to the utility, how those payments are distributed, and the age and amount of utility and supplier debts. This is essential so that suppliers can monitor customer arrears, send collection notices, and reconnect customers to utility service."*

- (a) Please indicate whether WGL would be able to implement WGL Energy's recommended approach described above by the next annual discount rate application, reflecting POR discount rates that are based on supplier-specific uncollectible rates.
- (b) If the answer to item (a) above is affirmative, please provide a step-by-step approach that the Company would use to compute the supplier-specific discount rate.
- (c) If the answer to item (a) above is affirmative, please indicate whether any system upgrade would be required and the timing and cost of such an upgrade.
- (d) If the answer to item (a) above is affirmative, please indicate the nature of the annual discount rate application that the Company envisions would be made to the Commission, including (but not limited to) the estimated number of pages of the application.
- (e) If the answer to the item (a) is non-affirmative, please provide a detailed explanation, and indicate whether a system upgrade would help achieve the recommended approach, as well as the cost and timing for such an upgrade.