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January 6, 2026

VIA ELECTRONIC FILING

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

Re: FORMAL CASE NO. WGPOR2025-01-G
[WASHINGTON GAS' RESPONSE TO COMMISSION DATA
REQUEST NO. 2, QUESTIONS 2-1]

Dear Ms. Westbrook-Sedgwick:

Washington Gas Light Company hereby transmits its response to Commission Data Request No. 2, Question 2-1 in the above referenced matter.

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

Sincerely,

/s/ Deborah Moss

Deborah Moss
Associate General Counsel

Pc: Per Certificate of Service

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

WGPOR-2025-01

WASHINGTON GAS'S RESPONSE
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY TO
THE PUBLIC SERVICE COMMISSION

COMMISSION DATA REQUEST NO.

QUESTION NO. 2-1

- Q.** 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.

WASHINGTON GAS'S RESPONSE

January 06, 2026

A.

(a) It is difficult to answer this question given the high-level description of WGL Energy's proposed approach to the purchase of receivables. Having said that, given the anticipated work between the utilities and competitive service providers to implement a new approach, and the IT changes that would need to be made, Washington Gas does not believe it is possible to implement WGL Energy's recommended approach before the next annual discount rate application, which is due in April 2026.

Further, given the lack of specifics in WGL Energy's proposed approach, Washington Gas is unable to agree to this proposed change at this time.

(b-e) Please see the response to (a) above. The Company is unable to provide a cost estimate or a timeline for implementing WGL Energy's proposed changes because the proposal lacks the details necessary to provide such estimates.

SPONSOR: Andrew Lawson
Director – Regulatory Affairs

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 6th day of January 2026, I caused copies of the foregoing to be hand delivered, mailed postage prepaid or electronically delivered to the following:

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/s/ Deborah Moss
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