

**PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA  
1325 G STREET, N.W., SUITE 800  
WASHINGTON, D.C. 20005**

**January 16, 2026**

**FORMAL CASE NO. 1154, IN THE MATTER OF WASHINGTON GAS LIGHT COMPANY'S APPLICATION FOR APPROVAL OF PROJECTPIPES 2 PLAN,**

**FORMAL CASE NO. 1167, IN THE MATTER OF THE IMPLEMENTATION OF ELECTRIC AND NATURAL GAS CLIMATE CHANGE PROPOSALS,**

**FORMAL CASE NO. 1179, IN THE MATTER OF THE INVESTIGATION INTO WASHINGTON GAS LIGHT COMPANY'S STRATEGICALLY TARGETED PIPE REPLACEMENT PLAN**

**INQUIRY OF COMMISSIONER BEVERLY**

This inquiry is issued pursuant to D.C. Code §34-802, which gives each Commissioner independent authority to pursue any line of inquiry that the Commission itself could pursue.

I have consistently expressed my view in both dissents and statements that the PIPES program is too costly and too slow to be in the public interest. The original intent of the program was to answer PHMSA's nationwide call to action and remove hazardous materials (particularly bare steel and cast iron) from our pipelines. To me, our process for answering PHMSA's call simply doesn't work. Instead of continuing to give the Company surcharge funding for a program where we approve funding first and review the proposed projects and workplan second, I have drafted rules in Attachment A to propose an alternative to the surcharge mechanism. The draft rulemaking would amend Chapters 23 and 37 of the Commission's regulations to establish rules governing accelerated pipeline replacement/repair. It is issued by me individually, not the Commission. The purpose of this draft is solely to gauge interest in modifying our approach to future programs and is not intended to have any bearing on the Company's pending pipeline applications. I request that interested persons or parties provide comments on the draft rulemaking within 45 days and reply comments (if desired) in 60 days.

# **ATTACHMENT A – DRAFT RULEMAKING**

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

**DRAFT RULEMAKING**

**RM23-2026-01, IN THE MATTER OF 15 DCMR CHAPTER 23 – NATURAL GAS,**

**RM37-2026-01, IN THE MATTER OF 15 DCMR CHAPTER 37 – NATURAL GAS  
QUALITY OF SERVICE STANDARDS**

1. The Public Service Commission of the District of Columbia (Commission), pursuant to its authority under D.C. Official Code Sections 2-505 and 34-802,<sup>1</sup> hereby gives notice of its intent to amend Chapter 23 (Natural Gas) and Chapter 37 (Natural Gas Quality of Service Standards) of Title 15 (Public Utilities and Cable Television) of the District of Columbia Municipal Regulations (DCMR), in not less than thirty (30) days after the publication of this Notice in the *District of Columbia Register*.

2. The proposed regulations add the following requirements for gas corporations in the District of Columbia: 1) submission of federal reports to the Commission; 2) mapping and recordkeeping; 3) additional leak detection, survey, and record-keeping requirements; 4) abandonment requirements; 5) construction and installation reporting; 6) amended procurement reporting; 7) measurement and unaccounted for gas management; and 8) cast iron and bare steel main program. The proposed regulations also update the penalty provisions and definitions accordingly.

The proposed modifications to Sections 2301, 2305, 2315, 2397, 2399, and 3702 are shown by **underline** and the deletions by **~~strikethrough~~**. New sections 2303, 2309, 2316, and 2317 are added.

**Chapter 23, NATURAL GAS, of Title 15 DCMR, PUBLIC UTILITIES AND CABLE TELEVISION, is amended as follows:**

**Section 2301 is amended as follows:**

**2301 FEDERAL CODE PROVISIONS APPLICABLE**

2301.1 The federal government’s gas safety regulations for transportation of natural and other gas by pipeline, 49 CFR § 190 (Pipeline Safety Program Procedures), 49 CFR § 191 (Annual Reports and Incident Reports), 49 CFR § 192 (Minimum Federal Safety Standards), and 49 CFR § 199 (Drug Testing) shall be the natural gas pipeline safety standards for intrastate natural gas transmission and distribution

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<sup>1</sup> D.C. Official Code §§ 2-505 and 34-802.

facilities subject to the jurisdiction of the Commission, except to the extent that the regulations in this chapter are more stringent.

**2301.2 A copy of any report filed with the federal government shall be provided concurrently to the Commission.**

**A new Section 2303 is proposed as follows:**

**2303 FACILITY MAPS AND RECORDS**

2303.1 Each gas corporation shall, within ninety (90) days of the effective date of these rules, develop and maintain complete maps, plans, and records of its entire distribution system showing the size, character, and location of each main, regulator, valve, and service connection, together with such other information as may be necessary. The maps, plans, and records required by the provisions of this section shall be kept up to date so that the gas corporation may promptly and accurately furnish any information regarding its facilities, or copies of its maps, upon request by the Commission.

2303.2 Each gas corporation must, within ninety (90) days of the effective date of these rules, develop and maintain, on a continuing basis, a leak progression mapping system. Map attributes to be included, but not limited to, are:

- (a) pipeline material
- (b) location
- (c) cause
- (d) grade

2303.3 Each gas corporation shall provide an annual report to the Commission by March 31 of each year for the prior calendar year, containing the amount of time it takes for changes, repairs, or new facilities to be finalized and updated to the gas corporation's facilities maps, segregated into the following time intervals:

- (a) Less than 14 days;
- (b) More than 14 days, but less than 30 days;
- (c) More than 30 days, but less than 90 days;
- (d) More than 90 days, but less than 180 days;

- (e) More than 180 days, but less than 360 days;
- (f) More than 360 days.

Section 2305 is amended as follows:

**2305 SAFETY**

2305.1 **Leak Detection.** All surveys shall include ~~Gas leak detection surveys, including~~ all service lines up to the exterior building wall, regardless of meter placement,~~;~~ shall be made as follows: **If, when investigating a leak, an operator determines or has determined that the perimeter of a leak area extends to a building wall, the investigation must continue into the building unless public safety or identifiable urgent circumstances prohibit entry. Each gas corporation will maintain Commission-approved procedures for the calibration and maintenance of leak detection equipment. These procedures must consider the type of equipment, frequency of use, manufacturer's calibration recommendations, historical performance, age of equipment, required maintenance intervals, and equipment failure protocols. Each instrument utilized for leakage surveys and investigations must be tested against a known sample or in accordance with the manufacturer's recommended instructions. The procedures shall be filed with the Commission in *Formal Case No. 1179*. Each gas corporation shall provide these procedures to the Commission for approval within ninety (90) days of the effective date of these rules. Each gas corporation shall review these procedures annually and modify the procedures to the degree necessary to ensure that leak detection equipment used in the field has been properly calibrated and maintained. Modified procedures shall be filed in *Formal Case No. 1179* for Commission approval.**

- (a) Business Districts. A gas corporation shall conduct an annual survey in business districts, involving tests of the atmosphere in gas, electric, telephone, sewer, and water system manholes, at cracks in pavements and sidewalks, and at other locations providing an opportunity for finding gas leaks;
- (b) Within ninety (90) days of the effective date of these rules, the gas corporation shall provide the Commission with a map of the District of Columbia showing Business Districts and shall update the map whenever changes are made;
- (c) Places of Public Assembly. A gas corporation shall conduct an annual survey of service lines to places of public assembly using Hydrogen Flame Ionization (HFI) or Combustible Gas Indicator (CGI) or other comparable methods.;

- (d) Within ninety (90) days of the effective date of these rules, the gas corporation shall provide the Commission with a list of Places of Public Assembly in the District of Columbia and shall update the list whenever changes are made;
- (e) Each gas corporation or small gas operator shall conduct a survey of its entire distribution system not less than once every ~~three (3)~~ one (1) years;
- (f) Leakage tests by HFI or by CGI and bar hole or other comparable approved method shall be conducted within the immediate area of each new, repaired or replaced gas line after backfilling and after a reasonable period of gas pressurizing when the line is being placed into service;
- (g) Whenever a steel pipe or tubing is used in the attachment of a service line to a cast iron main, it shall be protected against external corrosion using an anode and test station, except in the case of a malleable fitting when use of an anode only is sufficient;
- (h) A pipeline no longer meeting cathodic protection criteria shall be remediated promptly. Prompt, as used in this section, is defined as resolving the loss of cathodic protection within the next monitoring cycle. Records showing when the pipeline was discovered to have lost cathodic protection and when the loss was remedied, along with annual test records, must be kept for as long as the pipeline remains in service; **and**
- (i) Records of Surveys
  - (1) Each gas corporation or small gas operator shall maintain a record of each leak survey showing by location and date:
    - (A) Leaks detected; and
    - (B) Severity of each leak; and
    - (C) Action taken
  - (2) These records shall be kept as long as the segment of pipeline involved remains in service.
- (j) **Leak Reporting**
  - (1) **Each gas corporation shall maintain a leak database in accordance with Section 3702 of the District of Columbia Municipal Regulations.**

(2) Gas corporations may not downgrade a leak unless it is repaired.

(k) Commission Leak Audit

(1) The Commission may undertake its own leak survey to audit a gas corporation's leak reporting records, not more than biennially.

(2) Upon completion of the Commission's first audit, the Commission shall promulgate additional regulations regarding de-escalating annual targets of permissible leaks at each grade.

(l) Cast Iron Main. Each gas corporation shall conduct a leakage survey of all cast iron main pipelines at least every 30 days between December 1 and April 30.

(m) Bare Steel Service Line. Each gas corporation finding a leak on a bare steel service line shall replace or rehabilitate the entire service line. A gas corporation shall replace all bare and coated cathodically unprotected steel service lines within a definable area when records indicate that twenty percent (20%) or more of the bare and coated cathodically unprotected steel services within that definable area have exhibited leaks.

2305.2 Pipeline Location

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~~(g) Each gas corporation shall notify the Office of Engineering in writing at least ten (10) days before the estimated start date of any construction project scheduled for completion in five (5) or more working days, or before the estimated start date of work related to an Integrity Management Program.~~

...

2305.3 Abandonment/Disconnection of Inactive Mains/Service Lines

(a) Each gas corporation shall monitor service lines where gas is no longer being billed to a customer and which are not cathodically protected steel or plastic gas service lines equipped with an excess flow valve, according to the operators' DIMP written plans until the lines are disconnected and abandoned.

- (b) Gas corporations discovering inactive bare steel (unprotected) service lines or stubs in the course of leakage surveillance, construction, maintenance, or inspection of facilities must abandon or replace those lines or stubs as follows: If leaking, abandon immediately at the main; if not leaking, abandon or replace as soon as practicable but not more than six (6) months after discovery.
- (c) The gas corporation must indicate in its mapping system any main or service line that is abandoned at the time it is abandoned.
- (d) The gas corporation shall maintain records of any main or service line that has been abandoned, including costs (invoicing, time coding, and receipts).
- (e) If a building with an active service line is to be demolished and is not slated to be replaced, the gas corporation must abandon the service line at the main.

A new Section 2309 is proposed as follows:

**2309 NOTICE OF CONSTRUCTION, PROPOSED INSTALLATION REPORTS, AND COMPLETED INSTALLATION REPORTS**

- 2309.1 Each gas corporation shall notify the Office of Engineering in writing at least ten (10) days before the estimated start date of any construction project scheduled for completion in five (5) or more working days, or before the estimated start date of work related to an Integrity Management Program.
- 2309.2 Gas corporations shall send a weekly report of scheduled construction and repair activities by email to the Office of Enforcement by 5:00 pm each Friday prior to the scheduled work. The report shall include the gas corporation and/or any contractor's construction activities and repair activities, broken down by individual crews. The work must list the date and address.
- 2309.3 A Proposed Installation Report shall be submitted to the Commission for any installation of new pipeline or replacement of existing pipeline that is estimated to cost \$3,500,000 or more. Proposed installation reports are not required for repair or rehabilitation of existing pipeline.
- 2309.4 At least 60 days prior to the construction of a new pipeline or replacement of an existing pipeline covered by Section 2309.3, a report shall be filed with the Commission in *Formal Case No. 1179* setting forth the proposed route and general specifications for such pipeline. The specifications shall include but not be limited to the following items:

- (a) Description and purpose of the proposed pipeline;
- (b) Route map and terrain profile sketches indicating maximum and minimum elevations of pipeline;
- (c) New pipeline material, and existing pipeline material and age for replacement projects;
- (d) Number of recorded leaks on pipeline to be replaced;
- (e) Maximum allowable operating pressure for which the line is being constructed;
- (f) Test medium and pressure to be used during strength testing;
- (g) Method of protection of pipeline from external corrosion and other hazards; and
- (h) Estimated cost with supporting detail, breaking out labor, materials, construction, and administrative costs. If the project is a replacement of existing pipeline, the costs of removal shall be separately estimated for transparency, since such costs are already included in the depreciation of the asset.

2309.5 In the case of a project necessary on an emergency basis, the report required by Section 2309.4 shall be filed with the Commission as far in advance of the project as practicable, but no later than 5 business days after the project has been initiated. Reports filed for emergency projects, in addition to other information required by Section 2309.4, must also detail the reasons that necessitated the project being performed on an emergency basis.

2309.6 Within 60 days after completion of the construction of a new pipeline or replacement of an existing pipeline covered by Section 2309.3, a Completed Installation Report shall be filed with the Commission in *Formal Case No. 1179*. The report will include, but not be limited to, the following items:

- (a) Dates of start and end of construction;
- (b) Timestamped photographs of construction;
- (c) Location;
- (d) Measured depth at deepest pit;

- (e) Copies of all permits;
- (f) Itemized final capital expenditures, breaking out labor, materials, construction, and administrative costs. If the project is a replacement of existing pipeline, the costs of removal shall be separated for transparency, since such costs are already included in the depreciation of the asset;
- (g) Explanation of cost variances where the final costs differed more than twenty-five (25%) from the estimated costs; and
- (h) Receipts, invoices, employee timecards, and other documentation of capital expenditures for the project.

2309.7 Projects for which a Completed Installation Report is required will only be eligible for cost recovery in a base rate proceeding if all the information required by Section 2309.6 has been provided. Projects with incomplete reporting at the time of a base rate application shall be excluded from cost recovery.

**Section 2315 is amended as follows:**

**2315 GAS PROCUREMENT REPORT**

2315.1 On ~~December 1<sup>st</sup>~~ March 31<sup>st</sup>, ~~biennially~~ annually, the Washington Gas Light Company (WGL or Company), shall file a Gas Procurement Report (GPR) setting forth the Company's gas procurement strategies and practices for the prior calendar year.

2315.2 The GPR shall contain the following information:

- (a) Actual ~~annual~~ daily and monthly gas supply purchased for the District of Columbia. The GPR shall also include billing determinants and costs, including weighted average cost of gas, as allocated to major classes of service by jurisdiction;

**A new Section 2316 is proposed as follows:**

**2316 GAS MEASUREMENT AND LOST AND UNACCOUNTED FOR GAS**

2316.1 Each gas corporation shall maintain adequate instruments and meters to obtain complete information for gas purchases, unless sufficient information is furnished by the utility supplying the gas. Each gas corporation shall also maintain adequate instruments and meters to measure the chemical content of the gas in its distribution system.

- 2316.2 Each gas corporation shall determine on a daily basis the quantity of gas supply purchased and received from each source of supply and summarize those quantities each month. Monthly reports shall be filed on the fifteenth of the month in *Formal Case No. 874*.
- 2316.3 Each gas corporation shall, on a monthly basis, measure the chemical content of the gas in its distribution system at least two (2) different locations within the District of Columbia. Each gas corporation shall report the chemical content in *Formal Case No. 874* by the fifteenth of the month for the prior month. A gas corporation is not required to report proprietary odorants.
- 2316.4 Each gas corporation shall provide an annual report of its records of gas supply purchase, produced, and received in *Formal Case No. 874*, in accordance with Section 2315.
- 2316.5 Each gas corporation shall submit an annual Lost and Unaccounted For (LAUF) Gas Report for approval to the Commission by March 31 of each year for the prior calendar year in *Formal Case No. 874*.
- 2316.6 The report shall include, but not be limited to, the following:
- (a) A list of each of the causes of LAUF that the gas corporation tracks as part of its operations.
  - (b) An accounting of the contribution by each of the different causes of LAUF gas. Gas received, gas delivered, and adjustments must represent actual gas quantities. Estimates may be provided but must be clearly identified and have supporting justification, assumptions, and calculations, such that the Commission or other stakeholder can reproduce the calculations.
  - (c) Adjustments must be individually identified by category (such as company use, calculable losses from construction, purging, storage migration, other temperature and pressure adjustments, and adjustments for heat content). Adjustments must be supported by metered data, sound engineering practices, or other quantifiable results that clearly support the gas corporation's need for the adjustment. Unsupported adjustments will not be approved.
- 2316.7 Each gas corporation shall, at a minimum, reduce distribution system loss performance in accordance with the metrics in the following table, beginning with its first subsequent filing on March 31, 2027. The metric starts with 4.25% in the first year and decreases by 0.5% every year until it reaches 2.25%.

<b>Year</b>	<b>Allowable LAUF %</b>
1	4.25%
2	3.75%
3	3.25%
4	2.75%
5+	2.25%

2316.8 LAUF levels above the applicable annual targets in Section 2316.7 shall be presumed to be excessive absent evidence to the contrary and may not be recovered from ratepayers. LAUF recovered from ratepayers shall be listed as a separate line item on customer bills.

**A new Section 2317 is proposed as follows:**

**2317 CAST IRON AND BARE STEEL MAIN PROGRAM**

2317.1 This section is in response to PHMSA’s call for “rehabilitation, repair, and replacement” of certain high-risk pipeline materials.

2317.2 Each gas corporation shall develop a risk methodology for individually ranking health, safety, and environmental risks of cast iron and bare steel main using, at a minimum, the following elements: leakage rate (based on the most recent annual survey in accordance with Section 2305.1), location, type, grade, and flow rate; material condition; age; nearby building type; air pollutants; and GHG emissions. Corporate and regulatory risks shall not be included in the risk calculation methodology. A gas corporation shall provide the following information for approval of its risk methodology to be approved by the Commission within 90 days of the effective date of these regulations:

- (a) Quantitative and/or probabilistic risk methodology proposed;
- (b) Inputs to the model, including a qualitative explanation of the accuracy of the data used;
- (c) Weighting of inputs and an explanation for the relative weights assigned; and
- (d) Outputs from the model, including risk scores and ranking for each cast iron and bare steel main

2317.3 Prior to approving the methodology, the Commission shall schedule at least one technical demonstration of the methodology for stakeholders by the gas corporation, as well as at least one stakeholder comment and reply comment period.

2317.4 Annual Risk Report. After the Commission has approved a risk methodology, each gas corporation shall provide a risk report to the Commission, submitted by September 30<sup>th</sup> each year. The report shall include the risk score and ranking for each cast iron/bare steel main each year.

2317.5 Annual Workplan. Based on the annual risk report, each gas corporation shall rehabilitate, repair, or replace cast iron and bare steel mains, beginning with the highest risk pipe in descending order of risk. Pipe abandonment is not part of this program and is governed by Section 2305.3 of these rules. Each gas corporation shall submit a workplan for the following calendar year by November 30<sup>th</sup>, in accordance with the Commission targets set below. The annual workplan shall include the pipes to be repaired, rehabilitated, and replaced, and GIS mapping that shows the project scope for each.

<b>Year</b>	<b>Miles of Cast Iron and Bare Steel Main to be Remediated</b>
1	6
2	8
3	10
4	12
5	14
6	16
7	18
8	20
9	22
10+	24

2317.6 Wholesale pipe replacement is disfavored by this Commission due to its lengthy duration and cost. If the gas corporation believes that replacement is the only option for a specific pipe, it shall provide a technical explanation in its workplan for why a pipe must be replaced, rather than repaired or rehabilitated. Pipe replacement is subject to Commission approval. The Commission shall approve, deny, or hold approval in abeyance subject to additional information within 30 days of the receipt of the annual workplan.

2317.7 The Cast Iron and Bare Steel Main Program targets shall be tied to a performance incentive mechanism, or PIM, with symmetrical upward and downward revenue adjustments of up to five basis points. Any upward or downward basis point adjustment shall be applied in the following calendar year. The PIM shall be applied as follows:

- (a) If a gas corporation meets the minimum annual target, there is no revenue impact

- (b) If a gas corporation exceeds the minimum annual target by 5% or misses it by 5%, the impact will be an increase of 5 basis points or a reduction of 5 basis points, respectively
- (c) If a gas corporation exceeds the minimum annual target by 10% or misses it by 10%, the impact will be an increase of 10 basis points or a reduction of 10 basis points, respectively

2317.8 WGL is not relieved of its obligation to operate its business in a manner that maintains safe, reliable service through expenditures and other capital investments in the ordinary course of business separate from the Cast Iron and Bare Steel Main Program.

**Section 2397 is amended as follows:**

**2397 PENALTIES**

...

2397.4 The following are the base amounts to be charged for violations of the Commission’s rules on pipeline safety:

<b>Violation</b>	<b>DCMR</b>	<b>Amount</b>
<b><u>Failure to provide a copy of any report filed with the federal government to the Commission</u></b>	<b><u>§ 2301.2</u></b>	<b><u>\$5,000</u></b>
...		
<b><u>Failure to provide maps, plans, or records to the Commission upon request</u></b>	<b><u>§ 2303.1</u></b>	<b><u>\$5,000</u></b>
<b><u>Failure to provide compliant annual report</u></b>	<b><u>§ 2303.3</u></b>	<b><u>\$20,000</u></b>
...		
<b><u>Failure to provide 10-day construction notice or weekly construction report to the Office of Enforcement</u></b>	<b><u>§ 2309.1-2309.2</u></b>	<b><u>\$5,000</u></b>
<b><u>Failure to submit a compliant Proposed Installation Report or Completed Installation Report</u></b>	<b><u>§ 2309.3-2309.6</u></b>	<b><u>\$20,000</u></b>
...		
Failure to file <b><u>compliant</u></b> gas procurement report	§ 2315	<del>\$5,000</del> <b><u>\$20,000</u></b>

<b>Violation</b>	<b>DCMR</b>	<b>Amount</b>
...		
<b><u>Failure to maintain instrumentation</u></b>	<b><u>§ 2316.1</u></b>	<b><u>\$10,000</u></b>
<b><u>Failure to file compliant monthly supply report</u></b>	<b><u>§ 2316.2</u></b>	<b><u>\$15,000</u></b>
<b><u>Failure to file compliant monthly chemical content report</u></b>	<b><u>§ 2316.3</u></b>	<b><u>\$15,000</u></b>
<b><u>Failure to file compliant annual LAUF report</u></b>	<b><u>§ 2316.5-2316.6</u></b>	<b><u>\$20,000</u></b>
<b><u>Failure to provide risk methodology for Commission review</u></b>	<b><u>§ 2317.2</u></b>	<b><u>\$20,000</u></b>
<b><u>Failure to provide compliant annual risk report</u></b>	<b><u>§ 2317.4</u></b>	<b><u>\$20,000</u></b>
<b><u>Failure to provide compliant annual workplan</u></b>	<b><u>§ 2317.5 – 2317.6</u></b>	<b><u>\$30,000</u></b>

Section 2399 is amended as follows:

**2399 DEFINITIONS**

...

**“Lost and Unaccounted for Gas (LAUF)” means the difference between the total gas available from all sources and the total gas accounted for as sales, net interchange, and company use. This difference includes leakage or other actual losses, discrepancies due to meter inaccuracies, variations of temperature or pressures, or both, and other variants, particularly billing lag.**

...

**“Rehabilitation” means the work associated with structurally reinforcing existing pipeline, such as lining or external wraps.**

**“Replacement” means the installation of pipeline that will replace an existing pipeline or pipeline segment due to alignment interference, deteriorating or aging conditions, pressure/capacity enhancement, or other reason.**

Chapter 37, NATURAL GAS QUALITY OF SERVICE STANDARDS, of Title 15 DCMR, PUBLIC UTILITIES AND CABLE TELEVISION, is amended as follows:

Section 3702 is amended as follows:

**3702 REPORTING AND REPAIRING REQUIREMENTS FOR GAS LEAKS AND ODOR COMPLAINTS**

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3702.12 The Natural Gas Utility shall create and maintain database(s) for all gas leaks and customer reported gas-related odor complaints. The database(s) shall be referred to as the Leak Identification, Detection and Repair, and Odor Complaints (“LIDAROC”). **The database will be maintained in a spreadsheet format, such as Excel or Access, and WGL shall maintain a public link to the database on its website. The database will be a single spreadsheet updated continuously, while snapshots of the database shall be saved at the end of each month and filed with the Commission in Formal Case No. 1179.** The database(s) shall contain, at a minimum:

- (a) The origination date **and how the Natural Gas Utility became aware of the leak;**
- (b) The work completion date;
- (c) The grade of the leak;
- (d) The type of leak;
- (e) The location (address or intersection ~~including the ward and/or quadrant where the leak occurred~~ **and GPS coordinates with latitude and longitude in separate columns;**
- (f) The ward;
- (g) The Number of customers whose services were disrupted because of the leak, if any;
- (h) The cause of the leak;
- (i) The response time in minutes;
- (j) The actions taken;

- (k) The leak ID number;
- (l) The work request Order number;
- (m) The work request type code;
- (n) The Code Number;
- (o) The actual repair time in days; ~~and~~
- (p) The actual repair time in minutes;
- (q) **Pipeline material;**
- (r) **Pipeline age;**
- (s) **Pipeline operating pressure;**
- (t) **Leak concentration; and**
- (u) **Leak flow rate.**

3702.13 The Natural Gas Utility shall incorporate all natural gas leaks and customer reported odor complaint calls into the database(s) within five (5) days of receipt of the gas-related odor complaint and/or determination that a leak has occurred on its gas system.

3702.14 The Natural Gas Utility shall update the database(s) after it has repaired and/or resolved the leak and customer reported odor complaints. ~~and shall submit an electronic and a hard copy of the database(s) to the Commission and OPC on a quarterly basis. On the fifteenth of each month, the Natural Gas Utility shall file a snapshot of the database at the prior month's end, along with the following information in a monthly report in *Formal Case No. 1179*:~~

- (a) **Number of leaks at the beginning of the month, by grade;**
- (b) **Number of leaks found/reported during the month, by grade;**
- (c) **Number of leaks repaired during the month, by grade; and**
- (d) **Number of leaks found/reported and awaiting repair at the end of the month, by grade**