

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

ORDER

March 4, 2026

**FORMAL CASE NO. 1179, IN THE MATTER OF THE INVESTIGATION INTO
WASHINGTON GAS LIGHT COMPANY’S STRATEGICALLY TARGETED PIPE
REPLACEMENT PLAN, Order No. 22798**

I. INTRODUCTION AND EXECUTIVE SUMMARY

1. By this Order, the Public Service Commission of the District of Columbia (“Commission”) approves, subject to conditions as set out in this Order, a modified version of the Washington Gas Light Company’s (“WGL” or “Company”) District Strategic Accelerated Facilities Enhancement Plan (hereinafter referred to as “Modified District SAFE Plan”) which authorizes WGL to replace the immediate high-risk aging leak-prone pipe.

2. In *Formal Case No. 1115 PROJECTpipes 1* and *Formal Case No. 1154 PROJECTpipes 2*, the Commission approved material-specific subprograms with defined annual spending allocations and material targets.¹ Accelerated pipeline replacement work authorized via the PROJECTpipes program phases 1 and 2, targeted cast iron mains, bare and unprotected steel mains and services, mechanically coupled steel segments, and other designated materials. Each PROJECTpipes phase of the program and their associated extensions operated within its own parameters and funding structure.

3. In *Formal Case No. 1175*, the Commission rejected WGL’s PROJECTpipes 3 application and directed WGL to revise its pipeline replacement program to target the highest-risk, leak-prone mains and services over a three-year period.² Specifically, the Commission mandated a strategically focused pipe replacement program, designed to preemptively address the District’s aging, leak-prone infrastructure to avoid cascading leaks and dangerous “super emitter” events.³ This represented a decisive shift from the originally conceived 40-year pipe replacement based solely on age and material, establishing a “new normal” that prioritizes targeted, high-risk

¹ *Formal Case No. 1115, Application of Washington Gas Light Company for Approval of a Revised Accelerated Pipe Replacement Program (“Formal Case No. 1115”),* Order No. 17431, rel. March 31, 2014; and *Formal Case No. 1154, In the Matter of Washington Gas Light Company’s Application for Approval of PROJECTpipes 2 Plan (“Formal Case No. 1154”),* Order No. 20671, rel. December 11, 2020.

² *Formal Case No. 1154, Washington Gas Light Company’s Application for Approval of PROJECTpipes 2 Plan (“Formal Case No. 1154”); Formal Case No. 1175, In the Matter of Washington Gas Light Company’s Application for Approval of PROJECTpipes 3 Plan (“Formal Case No. 1175”)* and *Formal Case No. 1179, In the Matter of the Investigation Into Washington Gas Light Company’s Strategically Targeted Pipes Replacement Plan (“Formal Case No. 1179”),* Order No. 22003, rel. Jan 12, 2024.

³ Order No. 22003, ¶ 48.

mitigation to uphold the Commission's paramount responsibility for safety and reliability. This Order stated that future replacements must maximize risk reduction per dollar spent, ensuring that every investment effectively lowers Green House Gas ("GHG") emissions by addressing the most leak-prone segments first in alignment with Federal and District climate initiatives. The Commission noted that this narrowed focus is necessary to mitigate the threat of stranded assets as the District accelerates its transition toward full electrification balancing the urgent need for operational integrity with a just and reasonable, climate-aligned energy transition. The Commission continues to maintain its intent in ensuring that essential infrastructure work remains both safe and environmentally sustainable for all District residents.

4. The Commission finds that the Modified District SAFE Plan is in compliance with Order No. 22003, and we approve the use of the JANA Lighthouse ("JANA") risk prioritization model for evaluating pipeline risk and project development within the Modified District SAFE Plan. The Commission is persuaded that WGL's proposed risk prioritization methodology, utilizing the JANA model, is targeting immediate high-risk, aging, leak-prone materials to a satisfactory degree and assigning them appropriate risk, and not simply relying on eligible material types.

5. In addition, the Commission approves a three (3) year plan period, July 1, 2026, through June 30, 2029, with a budget of \$150 million, which represents approximately a 30% reduction from WGL's proposed budget. The Commission adopts an annual budget that resets each year with no rollover if the prior year's expenditures are below the authorized dollar limit. The Commission sets the spending caps for July 1, 2026, through June 30, 2027, at \$45 million, for July 1, 2027, through June 30, 2028, at \$50 million, and for July 1, 2028, through June 30, 2029, at \$55 million. We believe this approach balances the need for a safe and reliable gas distribution system by reducing both the risk of stranded assets and the burden on ratepayers.

6. After careful review and consideration, the Commission believes that a surcharge recovery mechanism is necessary and reasonable to ensure safety, parity with peer jurisdictions, and to prevent high-risk projects from being delayed by competition for capital or excessive borrowing costs. We find that in order to achieve a more strategically managed and cost-effective plan than in previous iterations, the Order directs WGL to balance this accelerated recovery through a combination of the surcharge and normal base rate recovery. Requiring this dual approach helps to ensure that essential infrastructure work remains economically sustainable for ratepayers while prioritizing the urgent replacement of high-risk segments.

7. When determining the annual budgets for the three (3) year program, the Commission sets an annual "threshold" amount of \$10 million for year one (22% of the modified District SAFE Year 1 budget), \$12.5 million for year two (25% of the Modified District SAFE Year 2 budget), and \$15 million for year three (27.2% of the modified District SAFE Year 3 budget) of the Modified District SAFE program. The "threshold" delineates the amount WGL must spend under the Modified District SAFE program before it can be eligible for accelerated recovery. The Commission will strictly limit expenditures beyond the Commission-authorized threshold amount to be eligible for accelerated cost recovery through the surcharge mechanism up to that year's budget cap.

8. Some of the modifications that the Commission adopts in this Order pertain to the reporting requirements (set forth in Section VI.J) to ensure that the Modified District SAFE Plan is consistent with the Commission's continued intent to maintain a balance between addressing immediate safety concerns while minimizing the risk of stranded assets in alignment with the District of Columbia's ("District") climate goals. These reports and compliance filings range from providing an update to the proposed fifteen (15) miles of pipe that have been identified for potential abandonment, to the Annual Project List with complete JANA model outputs, to the Annual and Semi-Annual Completed Projects Report, to the Current Factor Report, to the Threshold Reconciliation Reports, to the Reconciliation Factor Reports, to the Customer Choice Report, to a Two-Year Performance report, to the Program Implementation Plan, to the Studies and Analysis Report, and to the tariff filings. We believe that these enhanced reporting requirements will provide the Commission and the parties with greater transparency in the development, management, and performance of the Modified District SAFE Plan.

9. As stated in Order No. 22003, the Commission reaffirms that wholesale replacement of pipes is not necessarily the most cost-effective approach to risk mitigation. To ensure that pipeline replacement is pursued only when absolutely necessary, WGL shall prioritize the evaluation of Non-Pipeline Alternatives ("NPA") and may only include a project in the Annual Project List if it provides a justification proving that no alternative can safely and effectively mitigate the identified risk. This explanation shall include any NPAs, including pipeline abandonment, considered to mitigate risk for any of the included pipe segments, and shall include a justification to pursue replacement instead. With respect to WGL's proposed NPA, the Commission approves WGL's Customer Choice Pilot Program with modifications detailed in this Order, which is a graduated notification-and-opt-out program that allows customers to opt out of gas service on service lines that are scheduled for replacement. The Commission believes that this program is a step in the right direction toward minimizing stranded assets and directly aligns infrastructure work with the District's climate goals of moving towards electrification and minimizing unnecessary investments in the gas grid.

10. The pipeline work authorized under the Modified District SAFE program shall be strictly based on quantified risk reduction per dollar spent. The Company shall not be allowed to modify the list of projects following the Commission's approval of the annual project list submission without seeking prior permission from the Commission. Further, the Commission will only allow recovery of the cost to abandon high-risk pipes only when they are directly associated with other installations on replacement projects. In other words, abandonment-only project costs shall be excluded from the annual threshold and surcharge cost recovery mechanism.

11. The Commission believes that the Modified District SAFE Plan is in alignment with the District's climate goals and appropriately balances the interests of safety, reliability of WGL's system, District residents, and the District's climate goals. We reiterate that the Commission is committed to supporting the District's clean energy and climate goals and, in doing so, will utilize all available regulatory authority to ensure that WGL's safety and reliability are maintained across the District and that rates remain just and reasonable. The Commission finds that *Formal Case No. 1179*, the Modified District SAFE Plan, protects consumers, ensures the safety and reliability of regulated gas distribution services, and is in the public interest.

12. Final compliance tariffs consistent with this Order shall be filed within thirty (30) days of the issuance of this Order.

13. Finally, to better aid the Commission and its stakeholders in planning gas distribution in the District, the Commission opened *Formal Case No. 1187*, an Integrated Natural Gas Distribution Planning proceeding (“INGDP”).

II. BACKGROUND

14. In 2014, the Commission approved the first five-year phase of WGL’s 40-year Revised Accelerated Pipe Replacement Plan (“PIPES 1”).⁴ The PIPES 1 plan included proposals to replace aging, leak-prone pipeline infrastructure with the highest risk and leak rates (*i.e.*, cast-iron main lines and bare, unprotected steel mains) at an estimated cost of \$110 million.⁵ WGL filed its PROJECTpipes 2 Plan (“PIPES 2”) on December 7, 2018, requesting approval for five years (*i.e.*, October 1, 2019, through December 31, 2024).⁶ The PIPES 2 plan included proposals for eight distribution replacement programs and five transmission replacement programs at an estimated cost of \$305.3 million.⁷ Instead of the five-year proposal, the Commission approved a three-year Plan requiring WGL to address distribution system safety and reliability, including more restrictive performance targets for replaced pipe and the District’s climate goals.⁸ WGL filed its PROJECTpipes 3 (“PIPES 3”) Application on December 22, 2022, which was a five-year \$671.8 million proposal.⁹ On February 23, 2024, the Commission issued Order No. 21960, granting WGL a 12-month extension on PIPES 2 until February 28, 2025.¹⁰ On June 12, 2024, the Commission issued Order No. 22003, dismissing PIPES 3 and opening *Formal Case No. 1179*.¹¹

⁴ *Formal Case No. 1093, In the Matter of the Investigation into the Reasonableness of Washington Gas Light Company’s Existing Rates and Charges for Gas Service (“Formal Case No. 1093”), and Formal Case No. 1115, Order No. 17431, ¶ 1, rel. March 31, 2014 (“Order No. 17431”).* The Accelerated Pipe Replacement Plan was renamed and is currently known as PROJECTpipes.

⁵ *Formal Case No. 1093, Washington Gas Light Company’s Request for Approval of a Revised Accelerated Pipe Replacement Plan (Public Version and Confidential Version), at 2-3, and 6, filed August 15, 2013.*

⁶ *Formal Case No. 1154, Washington Gas Light Company’s Application for Approval of PROJECTpipes 2 Plan (“Formal Case No. 1154”), filed December 7, 2018 (“WGL’s PIPES 2 Plan”).*

⁷ WGL’s PIPES 2 Plan at 4.

⁸ *Formal Case No. 1154, Order No. 20671, ¶¶ 35-36, rel. December 11, 2020 (“Order No. 20671”).*

⁹ *Formal Case No. 1175, In the Matter of Washington Gas Light Company’s Application for Approval of PROJECTpipes 3 Plan (“Formal Case No. 1175”), Washington Gas Light Company’s Application for Approval of PROJECTpipes 3 Plan, filed December 22, 2022 (“PIPES 3 Application”).*

¹⁰ *Formal Case No. 1154, Order No. 21960, ¶ 13, rel. February 23, 2024 (“Order No. 21960”).*

¹¹ *Formal Case No. 1154, Formal Case No. 1175, and Formal Case No. 1179, Order No. 22003, ¶ 1, rel. June 12, 2024 (“Order No. 22003”).*

15. By Order No. 22003, the Commission initiated this proceeding, which, *inter alia*, adopted a procedural schedule for filing a revised application for WGL’s strategically targeted accelerated pipe replacement program (hereinafter, the “District SAFE Plan” or “Plan”).¹² On July 26, 2024, by Order No. 22241, the Commission adopted a modified procedural schedule to adjudicate WGL’s District SAFE Plan, extending the plan filing deadline until September 27, 2024, and directed WGL to hold biweekly meetings with interested stakeholders to discuss critical policy issues related to the Plan.¹³ On August 7, 2024, by Order No. 22257, the Commission denied WGL’s Application for Reconsideration of Order No. 22003 and re-emphasized that WGL’s new plan should balance pipeline safety and climate safety and clarified that the Commission does not prioritize electrification over safety.¹⁴

16. On September 27, 2024, WGL filed its direct testimony and the proposed District SAFE Plan, which targets the replacement of certain vintage pipe materials and the recovery of the costs associated with the Plan through the previously approved surcharge mechanism for WGL’s accelerated pipe replacement program.¹⁵

17. On October 24, 2024, by Order No. 22317, the Commission, among other things, *sua sponte* granted intervener status to the District of Columbia Government (“DCG”), Earthjustice/Sierra Club (“Sierra Club”), and Philadelphia-Baltimore-Washington Construction and Public Employees Laborers’ District Council (“PBWLDC”). In addition, the Order granted the Joint Motion to extend time to file direct testimony filed by the Office of the People’s Counsel for the District of Columbia (“OPC”) and the DCG and modified all the other procedural dates.¹⁶ Order No. 22317 also extended the PIPES 2 Plan and surcharge from February 28, 2025, through April 30, 2025.¹⁷

¹² Order No. 22003, ¶¶ 7, 54.

¹³ *Formal Case No. 1179*, Order No. 22241, ¶¶ 8-9, rel. July 26, 2024 (“Order No. 22241”).

¹⁴ *Formal Case No. 1179*, Order No. 22257, ¶ 11, rel. August 7, 2024 (“Order No. 22257”).

¹⁵ *Formal Case No. 1179*, Washington Gas Light Company’s Revised Application for Approval of the District Strategic Accelerated Facility Enhancement Plan, filed September 27, 2024. WGL Exhibit A-1 (Steffes Direct) at 5. While WGL (A), (2A), and (3A), along with its associated exhibits, were originally presented by Witness Jessica R. Rogers, on September 16, 2025, WGL filed a Notice of Witness Substitution. Later, on October 24, 2025, WGL filed an additional notice of Witness Substitution for the same pieces of testimony. As a result, all testimony and data responses proffered by Witness Rogers, and later adopted by James D. Steffes, are now adopted by Rachelle Whitacre. All of the above-referenced testimony will henceforth be referenced under the name Whitacre in this proceeding.

¹⁶ *Formal Case No. 1179*, Order No. 22317, rel. October 24, 2024 (“Order No. 22317”).

¹⁷ Order No. 22317, ¶¶ 1, 21.

18. On December 10, 2024, OPC,¹⁸ DCG,¹⁹ Sierra Club²⁰ PBWLDC,²¹ and Miller Pipeline²² filed direct testimony. On January 6, 2025, WGL filed rebuttal testimony.²³

19. On January 2, 2025, WGL filed a motion to convene an in-person evidentiary hearing, asserting that there are material issues of fact in dispute.²⁴ OPC, DCG, the Apartment & Office Building Association of Metropolitan Washington (“AOBA”), and the Sierra Club Movants filed a Joint Response/Motion to dismiss WGL’s District SAFE Plan Application.²⁵ On January 8, 2025, the Commission issued a Public Notice holding the procedural schedule in abeyance until further Order of the Commission.²⁶ On February 19, 2025, the Commission issued Order No. 22367, which partially denied the Joint Response/Motion to Dismiss and *inter alia*, amended the Procedural Schedule and directed the parties to file a joint list of the material issues of fact in dispute by May 30, 2025, and extended WGL’s PIPES 2 Program through December 31, 2025.²⁷

20. On February 26, 2025, the District Department of Transportation (“DDOT”), on behalf of DCG, filed comments pertaining to WGL’s District SAFE Plan proposal.²⁸ On March 21, 2025, Sierra Club and DCG filed a Joint Application for Reconsideration of Order No. 22367.²⁹

¹⁸ *Formal Case No. 1179*, Office of the People’s Counsel for the District of Columbia’s Direct Testimony and Exhibits, filed December 10, 2024.

¹⁹ *Formal Case No. 1179*, Direct Testimony of District of Columbia Government Witness Dr. Asa S. Hopkins, filed December 10, 2024; *see also Formal Case No. 1179*, Direct Testimony of District of Columbia Government Witness Katya R. Botwinick, filed December 11, 2024.

²⁰ *Formal Case No. 1179*, Sierra Club’s Direct Testimony, with accompanying exhibits, filed December 10, 2024.

²¹ *Formal Case No. 1179*, Direct Testimony of Julio Palomo On Behalf of Philadelphia-Baltimore-Washington Laborers’ District Council, filed December 10, 2024.

²² *Formal Case No. 1179*, Testimony of Frank Bracht Regional Vice President of Operations, Miller Pipeline, filed December 10, 2024. Miller Pipeline never requested nor were they granted intervenor status but filed testimony.

²³ *Formal Case No. 1179*, Washington Gas Light Company’s Rebuttal Testimony, filed January 6, 2025.

²⁴ WGL’s Motion at 4.

²⁵ *Formal Case No. 1179*, the Office of the People’s Counsel of the District of Columbia’s, the District of Columbia Government, the Apartment and Office Building Association of Washington Metropolitan Washington, and the Sierra Club’s Joint Response to Washington Gas Light’s Motion for Evidentiary Hearing and Joint Motion to Dismiss the Application Due to Noncompliance with Order No. 22003/Motion for Enlargement of Time, filed January 9, 2025 (“Joint Response/Motion”).

²⁶ *Formal Case No. 1179*, Public Notice, rel. January 8, 2025 (“Notice”).

²⁷ *Formal Case No. 1179*, Order No. 22367, rel. February 19, 2025 (“Order No. 22367”)

²⁸ *Formal Case No. 1179*, Comments of the District Department of Transportation on Washington Gas Light Company’s District SAFE Plan, filed February 26, 2025 (“DDOT Comments”).

²⁹ *Formal Case No. 1179*, Joint Application for Reconsideration of Order No. 22367, filed March 21, 2025.

WGL filed a Response opposing the Joint Application on April 1, 2025.³⁰ On April 10, 2025, the Commission issued Order No. 22402, denying the Joint Petition and affirming the direction given in Order No. 22367.³¹ On April 11, 2025, WGL filed testimony in response to DDOT and DCG's February 26 comments.³² On April 23, 2025, OPC filed supplemental testimony on the District SAFE Plan and WGL's earlier response to DDOT's comments.³³ WGL later filed surrebuttal testimony on May 27, 2025, responding to OPC's supplemental testimony.³⁴

21. On May 30, 2025, WGL filed its list of Material Issues of Fact.³⁵ The Commission subsequently issued Order Nos. 22434,³⁶ 22689,³⁷ and 22700,³⁸ ultimately extending the deadline for submitting material issues of fact until August 12, 2025. On August 12, 2025, OPC, DCG, and the Sierra Club filed their joint list of issues they considered to be in dispute.³⁹

22. On September 15, 2025, the Commission issued Order No. 22716, which found that there were no material issues of fact in dispute at that time, inclusive of the parties' suggested issue of fact that the Company had failed to comply with Order No. 22003⁴⁰, but directed that WGL provide more granularity and details for the JANA Lighthouse ("JANA") risk model and further modified the procedural schedule.⁴¹

³⁰ *Formal Case No. 1179*, Washington Gas' Motion for an Enlargement of Time to File a Response to the Joint Petition for Reconsideration filed by Sierra Club and the District of Columbia Government, filed March 25, 2025.

³¹ *Formal Case No. 1179*, Order No. 22402, rel. April 10, 2025.

³² *Formal Case No. 1179*, Washington Gas Light Company's Response in Opposition to the Comments of the District Department of Transportation, filed April 11, 2025 ("WGL (I) – Murphy").

³³ *Formal Case No. 1179*, Office of the People's Counsel for the District of Columbia's Revised Supplemental Testimony of Witness Colin T. Fitzhenry, filed April 23, 2025 ("OPC (2A) – Fitzhenry Supplemental").

³⁴ *Formal Case No. 1179*, Washington Gas Light Company's Surrebuttal Testimony of Jessica R. Rogers [Rachelle Whitacre] ("WGL (3A) – Whitacre Surrebuttal").

³⁵ *Formal Case No. 1179*, Washington Gas Light Company's List of Material Issues of Fact in Dispute ("WGL's Issues List"), filed May 30, 2025.

³⁶ *Formal Case Nos. 1154 and 1179*, Order No. 22434, rel. June 6, 2025 ("Order No. 22434").

³⁷ *Formal Case No. 1179*, Order No. 22689, rel. July 24, 2025 ("Order No. 22689").

³⁸ *Formal Case No. 1179*, Order No. 22700, rel. August 8, 2025 ("Order No. 22700").

³⁹ *Formal Case No. 1179*, Office of the People's Counsel for the District of Columbia, the District of Columbia Government, and Sierra Club's List of Material Issues of Fact in Dispute ("Parties' Joint List"), filed August 12, 2025.

⁴⁰ *Formal Case No. 1179*, Order No. 22716, ¶¶ 16-17. In this Order, the Commission noted that the analysis regarding Order No. 22003 did not present a factual dispute and involve legal interpretation, judgment, and policy determinations.

⁴¹ *Formal Case No. 1179*, Order No. 22716, ¶¶ 1, 30, and Attachment A.

23. WGL filed Supplemental Testimony on September 24, 2025, and Rebuttal Testimony on September 27, 2025.⁴² On October 14, 2025, OPC filed Supplemental Testimony⁴³ and DCG filed Rejoinder Testimony.⁴⁴ On October 20, 2025, WGL filed Rejoinder Testimony.⁴⁵

24. On November 5, 2025, the Commission issued Order No. 22735, finding limited material issues of fact in dispute regarding the JANA risk model's capability and its validation against actual leaks.⁴⁶ Order No. 22735 moved the previously established hearing date to an evidentiary hearing on December 9, 2025, and put the parties on notice that the Commission was accepting into the evidentiary record all pre-filed testimony, exhibits, data requests, responses to data requests, comments, affidavits, and admissions, unless detailed objections were made.⁴⁷ On December 4, 2025, WGL filed an Objection to Witness Designation, specifically the designation of WGL Witness Wayne Jacas for cross-examination, arguing that the Witness had not provided testimony within the scope of the limited hearing.⁴⁸

25. On November 26, 2025, the Commission issued Order No. 22746, granting WGL one final PIPES 2 extension until June 30, 2026.⁴⁹ On December 2, 2025, WGL and OPC both filed a Settlement Conference Report and Pre-Hearing filings.⁵⁰ On December 5, 2025, the Commission issued Order No. 22752, which set forth the Commission's determination on the pre-hearing stipulations, Admissions, and Authentication of Documents as requested by the parties.⁵¹ Additionally, the Order did not excuse WGL Witness Jacas from cross-examination, but limited the scope of his testimony to the designated material issues of fact.⁵²

⁴² *Formal Case No. 1179*, Washington Gas Light Company's Supplemental Testimony, filed September 24, 2025 ("WGL's Supplemental Testimony"); *Formal Case No. 1179*, Washington Gas Light Company's Rebuttal Testimony, filed October 20, 2025 ("WGL's Rebuttal").

⁴³ *Formal Case No. 1179*, the Office of the People's Counsel of the District of Columbia's Supplemental Testimony, filed October 14, 2025 ("OPC's Supplemental Testimony").

⁴⁴ *Formal Case No. 1179*, the District of Columbia Government's Rejoinder Testimony, filed October 14, 2025 ("DCG's Rejoinder").

⁴⁵ *Formal Case No. 1179*, Washington Gas Light Company's Rejoinder Testimony, filed October 20, 2025 ("WGL's Rejoinder").

⁴⁶ *Formal Case No. 1179*, Order No. 22735, ¶ 12, rel. November 5, 2025 ("Order No. 22735").

⁴⁷ Order No. 22735, ¶¶ 1, 14.

⁴⁸ *Formal Case No. 1179*, Washington Gas Light Company's Objection to Witness Designation, filed December 4, 2025 ("WGL's Objection").

⁴⁹ *Formal Case No. 1154*, Order No. 22746, ¶ 6, rel. November 26, 2025 ("Order No. 22746").

⁵⁰ *Formal Case No. 1179*, The Office of the People's Counsel of the District of Columbia's Report on Settlement Conference; and Prehearing Filing, filed December 2, 2025 ("OPC's Report"); and *Formal Case No. 1179*, Washington Gas Light Company's Prehearing Filings, filed December 2, 2025 ("WGL's Report").

⁵¹ *Formal Case No. 1179*, Order No. 22752, rel. December 5, 2025 ("Order No. 22752").

⁵² Order No. 22752, ¶ 17.

26. On December 9, 2025, the evidentiary hearing was held. The hearing transcript was filed late, due to technical issues with the vendor, on December 22, 2025.⁵³ On December 23, 2025, DCG filed an unopposed Motion for an Extension of Time to file a Motion for Correction(s) of the Transcript to January 6, 2026.⁵⁴ On December 24, 2025, the Commission issued Order 22767, granting DCG's motion.⁵⁵ On January 2, 2026, WGL and DCG filed motions to correct the transcript.⁵⁶

27. On January 12, 2026, Sierra Club filed an Unopposed Motion for Enlargement of Time to file post-hearing briefs.⁵⁷ On January 14, 2026, the Commission issued Order No. 22773, which granted the Sierra Club's Motion and set the due date for post-hearing briefs for January 21, 2026.⁵⁸ On January 21, 2026, OPC,⁵⁹ Sierra Club,⁶⁰ and WGL⁶¹ filed their post-hearing briefs. Following this, on January 22, 2026, DCG filed its post-hearing brief,⁶² along with an unopposed Motion to file post-hearing briefs out of time.⁶³ On January 29, 2026, by Order No. 22785, the Commission accepted DCG's Motion.⁶⁴

28. OPC, DCG, and the Sierra Club urge the Commission to reject the District SAFE Plan. The parties argue that the Plan should be rejected because: (1) WGL has not demonstrated

⁵³ *Formal Case No. 1179*, Transcript of the Evidentiary Hearing held on December 9, 2025, in the Commission's Hearing Room, filed December 22, 2025.

⁵⁴ *Formal Case No. 1179*, The District of Columbia Government's Unopposed Motion for Enlargement of Time to Submit Motions to Correct Transcript, filed December 23, 2025.

⁵⁵ *Formal Case No. 1179*, Order No. 22767, rel. December 24, 2025 ("Order No. 22767").

⁵⁶ *Formal Case No. 1179*, The District of Columbia Government's Motion to Correct the Transcript, filed January 2, 2026; *Formal Case No. 1179*, Washington Gas Light Company's Motion to Correct the Transcript, filed January 2, 2026. There being no opposition, the Commission grants these motions.

⁵⁷ *Formal Case No. 1179*, Sierra Club's Unopposed Motion for Enlargement of Time to File Post-Hearing Briefs, filed January 12, 2026.

⁵⁸ *Formal Case No. 1179*, Order No. 22773, rel. January 14, 2026 ("Order No. 22773").

⁵⁹ *Formal Case No. 1179*, Office of the People's Counsel of the District of Columbia's Post-Hearing Brief, filed January 21, 2026 ("OPC Brief").

⁶⁰ *Formal Case No. 1179*, Sierra Club's Post-Hearing Brief, filed January 21, 2026 ("SC Brief").

⁶¹ *Formal Case No. 1179*, Washington Gas Light Company's Post-Hearing Brief, filed January 21, 2026 ("WGL Brief").

⁶² *Formal Case No. 1179*, The District of Columbia Government's Post-Hearing Brief, filed January 21, 2026 ("DCG Brief").

⁶³ *Formal Case No. 1179*, The District of Columbia Government's Unopposed Motion to File Post-Hearing Brief Out of Time, filed January 23, 2026.

⁶⁴ *Formal Case No. 1179*, Order No. 22785, rel. January 29, 2026 ("Order No. 22785").

cost effectiveness; (2) WGL has not provided adequate targets or completion dates; or produced sufficient Greenhouse Gas (“GHG”) emissions analysis; (3) WGL has failed to evaluate electrification alternatives; (4) the Plan creates the risk for stranded assets; and (5) WGL’s Plan should not receive surcharge recovery.⁶⁵ WGL argues that the District SAFE Plan and Accelerated Pipe Replacement Plan (“APRP”) Adjustment Mechanism should be approved because it will help sustain and enhance the safety and reliability of the distribution system and help to balance WGL’s obligations to comply with Federal and District pipeline requirements and the directives in Order No. 22003.⁶⁶

29. On February 23, 2026, DCG filed an Errata.⁶⁷ DCG states that the Errata strikes a redundant subsection of its brief to eliminate confusion and to clarify the record for citation purposes.⁶⁸

III. COMMUNITY COMMENTS

30. During this proceeding, the Commission held two community hearings in order to engage with interested community members and to solicit comments from the public at large. The first community hearing was held on June 3, 2025, at the Anacostia Neighborhood Library, and the second on June 17, 2025, in the Public Service Commission Hearing Room. In addition to testifying at the hearing, several people submitted written testimony.⁶⁹

31. A number of District residents and organizations like Third Act, Green New Deal DC, Ward 3 Democratic Committee, and several others testified at these community hearings, either in support of or in opposition to the District SAFE Plan. Those who spoke in opposition to

⁶⁵ See OPC Brief at 19-21, 23; See DCG’s Brief at 3, 12-13, 20-21, 31; see also SC Brief at 2, 5, 11, 15.

⁶⁶ WGL Brief at 1-2.

⁶⁷ *Formal Case No. 1179*, Errata to the Confidential Version of the District of Columbia Government’s Post-Hearing Brief (“DCG Errata”).

⁶⁸ DCG Errata at 2-3.

⁶⁹ *Formal Case No. 1179*, Testimony of Karen Gladding, filed June 5, 2025; Testimony of Katie Ries, filed June 10, 2025; Testimony of Christopher Pfuntzner, filed June 18, 2025; Testimony of Vince Lampone, filed June 18, 2025; Testimony of Mike Litt on behalf of Public Interest Research Group, filed June 18, 2025; Testimony of Che Ruddell-Tabisola on behalf of Restaurant Association Metropolitan Washington, filed June 18, 2025; Testimony of East Peterson-Trujilo on behalf of Green New Deal for DC, filed June 18, 2025; Testimony of Judy Taylor, filed June 18, 2025; Testimony of Jessica Epperson-Lusty, filed June 20, 2025; Testimony of Anne deBuys, filed June 20, 2025; Testimony of William Owens, filed June 23, 2025; Testimony of Chesapeake Climate Action Network, filed June 24, 2025; Testimony of Matthias Paustian, filed June 26, 2025; Testimony of Geoffrey Barron, filed July 2, 2025.

the District SAFE Plan claimed it raised a range of issues for customers and the city.⁷⁰ Many participants opposed the District SAFE Plan because they believe it is antithetical to the climate goals, and that cleaner energy sources are the solution to the problems the District seeks to address.⁷¹ Others argued that the District SAFE Plan harms public health and safety by continuing to encourage the use of natural gas, which can harm human health when it leaks into homes and the atmosphere.⁷² Others cited the Plan's cost and the fact that it would be inappropriate to make ratepayers bear the burden of high replacement costs when alternatives such as pipeline repair exist.⁷³

32. In contrast, some participants spoke up in support of the District SAFE Plan.⁷⁴ Those participants were representatives of labor organizations like InfraSource and Miller Pipeline, associations like the Restaurant Association of Metropolitan Washington, and several individuals speaking on their own behalf, who argued that pipeline replacement through safe practices creates important, high-paying jobs for community members.⁷⁵ Some supporters cited the need for the District SAFE Plan to improve public safety, noting that replacing leak-prone pipes will reduce the risk of methane leaks.⁷⁶ Finally, there were participants who spoke about how they or their businesses benefit from the reliability of natural gas as an energy source for things like heating and cooking.⁷⁷

⁷⁰ *Formal Case No. 1179*, Transcript of the June 3, 2025 Community Hearing Testimony of Third Act, Carol Spring, Peter Weiss, Katie Ries, Jeannie Adams, Geoffrey Barron, Danielle Dunkin, Kate Sugarman, Ayla Frost, Forrest Cinelli, Charles Spring, Kevin Chisholm, Mod Edwards, Trumela Copeland, and John Capozzi, filed June 6, 2025 (June 3 Tr.); *Formal Case No. 1179*, Transcript of the June 17, 2025 Community Hearing, Testimony of Anne deBuys, Green New Deal for DC, Climate Team of the League of Women Voters DC, Max Broad, Matthias Paustain, Jonathan Herz, AARP DC, Chesapeake Climate Action Network, Claire Hacker, Rachel Samuels, Ward 3 Democratic Committee, Martin White, Public Interest Research Group, John Capozzi, Alix Underwood, Anthony Inhorn, Jessica Epperson-Lusty, Judy Taylor, Syra De, Carol Spring, Charles Spring, Stefanie Salazar, Dev Samoont, Kate Sugarman, and Philip Heinrich, filed June 20, 2025 (June 17 Tr.).

⁷¹ June 3 Tr.; June 17 Tr.

⁷² June 3 Tr.; June 17 Tr.

⁷³ June 3 Tr.; June 17 Tr.

⁷⁴ *Formal Case No. 1179*, Transcript of the June 3, 2025 Community Hearing Testimony of InfraSource, Miller Pipeline, and Danielle Gamble, filed June 6, 2025 (June 3 Tr.); *Formal Case No. 1179*, Transcript of the June 17, 2025 Community Hearing Testimony of Miller Pipeline, Antoinette Ford, Step Afrika, Vaughn Thomas, Raenika Dicks, Lucgratise Copeland, Genevieve Boisvert, Trent Leon, Restaurant Association of Metropolitan Washington, Ashelica West, and InfraSource, filed June 20, 2025 (June 17 Tr.).

⁷⁵ June 3 Tr.; June 17 Tr.

⁷⁶ June 3 Tr.; June 17 Tr.

⁷⁷ June 3 Tr.; June 17 Tr.

33. There were also District residents and organizations that submitted written comments to the Commission. Many of the commentators opposed the District SAFE Plan.⁷⁸ Those who submitted comments opposing the Plans' approval argued that approving the Plan would be a mistake because methane gas is inherently unsafe and will continue to harm human health.⁷⁹ In addition, these commentators argued that WGL will be ineffective at replacing the at-risk pipes, because of the extremely high costs that should not be borne by rate payers.⁸⁰ Lastly, commentators believe approving the District SAFE Plan would be antithetical to the District's climate goals and that the District should be moving toward electrification.⁸¹

34. Conversely, there were individuals and organizations that commented in support of the District SAFE Plan.⁸² These commentators believe that the District SAFE Plan will improve the safety of natural gas systems by replacing high-risk pipe, thereby reducing methane emissions.⁸³ Supportive commentators claim that the District SAFE Plan is necessary for the long-term reliability of the natural gas system, which many people depend on.⁸⁴

35. The Commission appreciates the comments from the public concerning WGL's accelerated pipe replacement plan. We acknowledge the myriad concerns the public has presented to the Commission for its consideration, including those related to climate. We have carefully considered all the comments from community witnesses in adjudicating WGL's Application.

IV. OVERVIEW OF WGL's PROPOSED DISTRICT SAFE PLAN

36. WGL's proposed District SAFE Plan outlines the Company's efforts to enhance safety, improve reliability, and reduce GHG emissions through an accelerated targeted infrastructure replacement plan. WGL set a budget for the District SAFE Plan at \$215 million over three years (CY25 - \$50 million, CY26 - \$75 million, and CY27 - \$90 million) to replace approximately 12.4 miles of main and 3,608 services (CY25 – 2.2 miles of main, 1,191 services replaced, 39 services transferred; CY26 – 2.5 miles of main, 1,515 services replaced, 116 services transferred; CY27 – 7.7 miles of main, 902 services replaced, 399 services transferred).⁸⁵ The District SAFE Plan represents a reduction of three percent of the vintage mains on the system and

⁷⁸ See Attachment A, Opposition Comments, filed August 8, 2024, through November 26, 2025 ("Opposition Community Comments").

⁷⁹ Opposition Community Comments.

⁸⁰ Opposition Community Comments.

⁸¹ Opposition Community Comments.

⁸² See Attachment B, Supportive Comments, filed October 17, 2024, through November 21, 2024 (Supportive Community Comments).

⁸³ Supportive Community Comments.

⁸⁴ Supportive Community Comments.

⁸⁵ WG (C) at 24:20-25:3 (Jacas Direct Testimony); WG (2A) at 29:4-7 (Whitacre Rebuttal Testimony).

fifteen percent of the vintage services-only work.⁸⁶ WGL asserts that greater acceleration is necessary to outpace the aging system and that the District SAFE Plan will provide the roadmap for doing so.⁸⁷

37. Specifically, the District SAFE Plan: (1) targets the highest-risk segments of the aging, leak-prone mains and services in the District for a period of three years (2025-2027); (2) strategically replaces leak-prone pipes to reduce risk, improve safety, and ensure reliable service; and (3) is scaled down to focus on and prioritize the highest-risk segments of pipe for greater cost-effectiveness.⁸⁸ According to WGL, this consolidated approach will allow the Company to prioritize replacements solely based on risk reduction potential.⁸⁹ WGL states that “the Commission should allow greater acceleration to ensure the safety of customers, particularly where the work is consistent with the goal of greater decarbonization.”⁹⁰ The Plan proposes to essentially use the existing surcharge cost recovery mechanism under the APRP Surcharge used for PROJECT *pipes* with one modification.⁹¹

38. WGL Witness Whitacre states that the Plan encompasses all vintage materials historically identified as high-risk, including cast iron mains, bare and unprotected steel mains and services, vintage mechanically coupled steel, and copper services.⁹² According to the Company, as of December 31, 2023, approximately 477 miles of main and 24,526 services remain subject to replacement.⁹³ WGL indicates it selected these materials for priority replacement based on multiple factors. First, these materials align with the Pipeline and Hazardous Materials Safety Administration’s (“PHMSA”) Call to Action, which targets cast iron, bare steel, mechanically coupled pipe, and other vintage materials due to their demonstrated higher risk of failure.⁹⁴ Second, the Company's leak data shows that some materials have disproportionately high leak rates. While these materials make up only about 40% of the system, they account for

⁸⁶ WG (C) at 25:5-6 (Jacas Direct Testimony).

⁸⁷ Exhibit WG (A)-1 at 5 (Whitacre Direct Testimony).

⁸⁸ Exhibit WG (A)-1 at 37 (Whitacre Direct Testimony); WG (A) at 6:19-24 (Whitacre Direct Testimony); WG (C) at 15:15-20 (Jacas Direct Testimony).

⁸⁹ WG (2A) at 6:21-7:1 (Whitacre Rebuttal Testimony).

⁹⁰ Exhibit WG (A)-1 at 42 (Whitacre Direct Testimony).

⁹¹ WG (F) at 6:13-16, 9:1-9 (Lawson Direct Testimony). Witness Lawson states that the elimination of appropriate funding would make the District an outlier nationwide in accelerated replacement programs. *Id.* at 8:6-9. See Pipeline and Hazardous Materials Safety Administration (“PHMSA”), “Call to Action to Improve Gas Pipeline Safety” 2011.

⁹² Exhibit WG (A)-1 at 29 (Whitacre Direct Testimony).

⁹³ Exhibit WG (A)-1 at 15 (Whitacre Direct Testimony).

⁹⁴ Exhibit WG (A)-1 at 5, 8 (Whitacre Direct Testimony); WG (2B) at 7:12-16 (Quarterman Rebuttal Testimony).

approximately 78% of all leaks on the main pipe.⁹⁵ Company Witness Jacas states that “the Company is focused on replacing eligible materials based on the JANA risk model and the risk-reduced-per-dollar-spent metric regardless of material type to maximize benefits and efficiently remove the most risk from the distribution system.”⁹⁶

39. WGL Witness Jacas notes that “[t]he dynamic nature of the risk profiles prioritization does not allow for a reliable prediction of the exact main, including size, material, and location, and specific services to be completed year over year for the life of the program.”⁹⁷ The Company further explains that external factors – such as “the financial landscape of the future, *i.e.*, the Covid-19 Pandemic, high inflation rates, supply chain disruptions, etc.” – may impact the actual pace and scope of replacements.⁹⁸

40. WGL seeks to recover these program costs through its existing accelerated pipe replacement program surcharge mechanism.⁹⁹ The Company proposes one modification from the accelerated cost recovery mechanism previously employed for PROJECT*pipes*: allow the inclusion of Operations and Maintenance (“O&M”) costs associated with developing and sending, via certified mail, a notification to customers that their service line has been identified for replacement, thereby affording the customer the opportunity to electrify their premises and abandon service prior to replacement.¹⁰⁰

41. WGL presents several arguments supporting the need for accelerated cost recovery through the APRP Surcharge. First, WGL argues that traditional base rate recovery would impose undue regulatory lag.¹⁰¹ Second, the Company notes that the majority of jurisdictions have accelerated replacement programs with special cost recovery mechanisms, reflecting a broad regulatory consensus that traditional ratemaking is insufficient for these programs.¹⁰² Finally, the Company argues that without the APRP Surcharge, it would likely need to file annual rate cases

⁹⁵ Exhibit WG (A)-1 at 13 (Whitacre Direct Testimony).

⁹⁶ WG (C) at 14:7-10 (Jacas Direct Testimony).

⁹⁷ Exhibit WG (C)-1 at 12 (Jacas Direct Testimony).

⁹⁸ Exhibit WG (C)-1 at 12 (Jacas Direct Testimony).

⁹⁹ WG (F) at 8:10-14 (Lawson Direct Testimony).

¹⁰⁰ WG (F) at 8:24-9:7 (Lawson Direct Testimony).

¹⁰¹ WG (F) at 4:20-5:7 (Lawson Direct Testimony). WGL also states that NARUC’s Resolution Encouraging Natural Gas Line Investment and the Expedited Replacement of High-Risk Distribution Mains and Service Lines, notes the adoption of alternative rate recovery mechanisms may be very effective for advancing safety and reliability infrastructure upgrades and may help expedite the replacement and expansion of pipeline systems. WG (G) at 7:8-13 (Fang Rebuttal Testimony).

¹⁰² WG (F) at 5:8-15 (Lawson Direct Testimony). Currently, 41 states and the District of Columbia have accelerated replacement programs or programs supportive of accelerated pipe replacement. WG (F) at 8:4-7 (Lawson Direct Testimony); WG (2B) at 10:6-12 (Quarterman Rebuttal Testimony).

to manage the regulatory lag, an approach that would be “administratively burdensome, inefficient, and costly to customers.”¹⁰³

42. WGL proposes using a risk-based approach to select and prioritize projects under the District SAFE Plan.¹⁰⁴ Instead of targeting specific material types through separate programs, as done under PROJECT*pipes*, the Company will evaluate all eligible vintage materials through a unified risk assessment process.¹⁰⁵ The primary driver of this shift is the use of the JANA risk assessment model, which WGL explains as a probabilistic set of models designed to identify the most leak-prone assets, quantify that risk, and capture the probabilities of loss-of-containment failure and the range of potential outcomes from a loss in containment.¹⁰⁶ For services-only projects that are not connected to any leak-prone pipe, WGL would group services into geographic “zones” and assign each its own risk score.¹⁰⁷ Each geographic area will be ranked from highest to lowest risk using JANA’s risk-ranking tool and prioritized based on the same risk-reduced-per-dollar-spent metric.¹⁰⁸ These quantified JANA “risk scores”, WGL explains, are first used to rank projects, then are subsequently sorted again by Risk-Reduction Per-Dollar-spent (“RRPD”) using more precise Class 3 estimates.¹⁰⁹ In the event no Class 3 estimates are available, WGL assures that they will be provided in updated project lists at a later time.¹¹⁰ After the projects are re-ranked, they are selected from the top down in accordance with the Commission’s budget for that period and aggregated into a project list.¹¹¹ The project lists are then to be submitted to the Commission for stakeholder review and approval on an annual basis, following the existing Commission-approved process.¹¹²

43. The Company argues that this method will “target those projects that optimize reductions in risk on a risk-reduced-per-dollar-spent basis,” on all vintage materials, effectively removing the most risk from the system within available funding.¹¹³ WGL asserts that the model evaluates various types of threats, including corrosion, joint failure, and third-party damage, and

¹⁰³ WG (F) at 7:16-18 (Lawson Direct Testimony).

¹⁰⁴ Exhibit WG (A)-1 at 28 (Whitacre Direct Testimony).

¹⁰⁵ WG (C) at 14:6-10 (Jacas Direct Testimony).

¹⁰⁶ WG (E) at 3:8-11 and 6:3-6 (Oliphant Direct Testimony); and WG (D) at 7:18-23 (Stuber Direct Testimony).

¹⁰⁷ SC (C) at 23:3-6 (Gas Technical Panel Direct Testimony).

¹⁰⁸ WG (C) at 16:12-17 (Jacas Direct Testimony); WG (2C) at 15:19-16:2 (Jacas Rebuttal Testimony).

¹⁰⁹ WG (3I) at 3:5:4:2 (Murphy Rebuttal Testimony); and WGL’s Brief at 17.

¹¹⁰ WGL Brief, citing WG (4I) at 3:18-4:2 (Murphy Rejoinder Testimony).

¹¹¹ WG (3I) at 4:2-4 (Murphy Rebuttal Testimony).

¹¹² WG (C) at 24:6-11 (Jacas Direct Testimony).

¹¹³ WG (C) at 14:6-10 and 15:17-21 (Jacas Direct Testimony).

breaks these down into more specific potential failure mechanisms.¹¹⁴ WGL states that they will leverage JANA's risk assessment capabilities to identify and prioritize projects for annual project selection.¹¹⁵ The Company explains that the JANA risk model will initially identify main projects, while WGL reviews the risk profile of all main projects within the District SAFE plan.¹¹⁶ WGL notes that “because the risk scores are calculated without considering relative economics and operational considerations, the Company will also target those projects that optimize reductions in risk on a risk-reduced-per-dollar-spent basis [...]”¹¹⁷

44. WGL has included in the District SAFE Plan proposal work compelled by others. The Company emphasizes that accelerating the replacement of facilities due to work compelled by others can reduce future impacts on customers and local businesses by eliminating the need to duplicate construction zones and repetitive disruption to the community.¹¹⁸

45. Additionally, the Company asserts that accelerated replacement of leak-prone facilities will advance the District’s climate objectives by reducing methane emissions.¹¹⁹ WGL projects that complete replacement of vintage materials would cut annual direct Scope 1 fugitive emissions from distribution mains and services from about 66,300 to approximately 5,300 metric tons of carbon dioxide equivalent, achieving a 92% reduction in fugitive emissions attributed to distribution mains and services.¹²⁰

46. To mitigate stranded asset risk, the Company proposes a Customer Choice Pilot Program, offering customers scheduled for service replacement the option to electrify and abandon gas service.¹²¹ Under this three-year period, WGL will notify customers whose service lines are scheduled for replacement. Customers will receive certified mail about one year before their scheduled replacement, allowing them to opt out if they plan to electrify. To qualify for the opt-out, customers must: (1) affirm they are the property owner; (2) demonstrate conversion to an alternative fuel source; and (3) terminate their Washington Gas service.¹²²

¹¹⁴ WG (D) at 4:7-13 (Stuber Direct Testimony).

¹¹⁵ Exhibit WG (A)-1 at 30 (Whitacre Direct Testimony).

¹¹⁶ WG (C) at 15:13-16 (Jacas Direct Testimony).

¹¹⁷ WG (C) at 15:17-21 (Jacas Direct Testimony).

¹¹⁸ WG (C) at 15:2-6 (Jacas Direct Testimony).

¹¹⁹ WG (E) at 16:8-11 (Oliphant Direct Testimony); WG (2A) at 27:3-10 (Whitacre Rebuttal Testimony).

¹²⁰ Exhibit WG (A)-1 at 34 (Whitacre Direct Testimony).

¹²¹ WG (A) at 8:25-9:3 (Whitacre Direct Testimony); WG (2A) at 44:13-17 (Whitacre Rebuttal Testimony).

¹²² WG (A) at 9:15-21 (Whitacre Direct Testimony).

47. The District SAFE Plan has identified approximately 15 miles of cast iron main segments with inactive services for evaluation for potential abandonment.¹²³ These facilities are included in the JANA risk model and will be removed from the system under the risk-reduce-per-dollar-spent metric if they do not adversely affect the reliability or operations of the distribution system.¹²⁴

V. DISCUSSION

A. Compliance With Order No. 22003

48. In Order No. 22003, the Commission rejected WGL's PIPES 3 proposal and directed the Company to submit a revised three-year accelerated pipes replacement plan.¹²⁵ The PIPES 3 proposal was rejected due to its high cost, protracted timeline, findings of insufficient information/data, lack of substantiation for claimed benefits, underperformance relative to initial timelines, and the need for better alignment with climate goals.¹²⁶ The Order directed WGL to submit a new restructured PIPES Application that targets the highest-risk segments of the aging, leak-prone mains, and services in the District for a period of three years.¹²⁷ The new plan was to provide a "scope of the work that is necessary in addressing the District's aging infrastructure with the highest risk to help maintain the safety and reliability of the gas distribution system."¹²⁸ In addition, the plan was to incorporate lessons learned and directives based on the findings and recommendations from the Continuum Audit.¹²⁹

49. The Order provided a comprehensive framework with procedural timelines and substantive filing requirements.¹³⁰ Procedurally, the Order specified informational requirements and analyses that should be included in the filing.¹³¹ Substantively, the Order defined broader conditions the plan must meet for approval, such as alignment with climate objectives and a focus on high-risk pipe segments.¹³² The Order emphasized that the plan should be more cost-efficient

¹²³ WG (C) at 19:6-8 (Jacas Direct Testimony).

¹²⁴ WG (C) at 19:8-13 (Jacas Direct Testimony).

¹²⁵ Order No. 22003, ¶ 49.

¹²⁶ Order No. 22003, ¶¶ 44-48.

¹²⁷ Order No. 22003, ¶ 49.

¹²⁸ Order No. 22003, ¶ 49.

¹²⁹ Order No. 22003, ¶ 49.

¹³⁰ Order No. 22003, ¶ 49.

¹³¹ Order No. 22003, ¶ 49.

¹³² Order No. 22003, ¶ 49.

and incorporate clearer metrics for evaluating progress.¹³³ In addition, the District SAFE Plan should prioritize pipeline segments more rigorously based on safety risks and environmental impacts.¹³⁴ Also, the plan must implement robust monitoring mechanisms to address concerns about prior underperformance, which includes establishing specific strategies, defining performance metrics, ensuring regular reporting, and creating feedback loops to continuously improve the program.¹³⁵ In response to WGL's request for reconsideration of Order No. 22003, the Commission denied the request and: (1) reaffirmed its decision that the Company was to file a replacement plan that balances pipeline safety and climate safety; (2) acknowledged that the Commission does not have the authority to prevent WGL from selling natural gas; (3) clarified that the Commission does not prioritize electrification over safety; and (4) confirmed that the Commission was not prohibiting WGL from implementing a program focused on the safety of the gas distribution system as prescribed by law.¹³⁶

50. After WGL submitted its new replacement plan as directed by Order No. 22003, the Commission issued Order No. 22367 addressing OPC, DCG, AOBA, and Sierra Club's Joint Motion to Dismiss, which asserted that WGL's District SAFE Plan failed to comply with Order No. 22003.¹³⁷ The Order denied the Joint Motion, finding that WGL's District SAFE Plan made a *prima facie* showing that it met the requirements set forth in Order No. 22003.¹³⁸ The Commission determined that the Plan encompassed sufficient directives from Order No. 22003 to warrant evaluation on its merits, including information on past replacement activities, current system conditions, performance metrics, timelines, historical data, scope and feasibility, budget assumptions, and prioritization methodology using the JANA risk model.¹³⁹ Specifically, the Order determined that there was a *prima facie* showing because the proposed District SAFE Plan: (1) was narrowly focused and "categorize[d] replacements based on specific materials and electrification consideration, proposing to maximize benefits and efficiently remove the most risk from the system"¹⁴⁰; (2) "provide[d] basic cost estimates, justifications for expenditures, and explanations of the proposed cost recovery mechanism"¹⁴¹; (3) proposed a three-year replacement

¹³³ Order No. 22003, ¶¶ 50, 51.

¹³⁴ Order No. 22003, ¶ 49.

¹³⁵ Order No. 22003, ¶ 51 a-r.

¹³⁶ *Formal Case No. 1179*, Order No. 22257, ¶ 11, rel. August 7, 2024 ("Order No. 22257").

¹³⁷ *Formal Case No. 1179*, Order No. 22367, rel. February 19, 2025. ("Order No. 22367").

¹³⁸ Order No. 22367, ¶ 19-20. The Commission allowed discovery to continue, and the Company provided additional testimony, exhibits, responses to data requests, and convened an evidentiary hearing. See WG (I) (Murphy Testimony); WG (3A) (Whitacre Surrebuttal Testimony); WG (3F) (Lawson Surrebuttal Testimony); WG (2I) (Murphy Surrebuttal Testimony); WG (3E) (Oliphant Supplemental Testimony); WG (3I) and (3I)-1 (Murphy Rebuttal Testimony); Exhibit WG (4E) (Oliphant Rejoinder Testimony); and WG (4I) (Murphy Rejoinder Testimony).

¹³⁹ Order No. 22367, ¶ 20, 25.

¹⁴⁰ Order No. 22367, ¶ 20.

¹⁴¹ Order No. 22367, ¶ 20.

schedule¹⁴²; (4) demonstrated the long-term impact and pacing strategies and contains a breakdown of remaining miles and service lines to be replaced, including material type and electrification considerations¹⁴³; (5) reflected that the annual project selection will be developed based on short-term and long-term considerations using JANA and presented to the Commission for approval¹⁴⁴; (6) referenced Lessons Learned from the first 10 years of PROJECTpipes¹⁴⁵; (7) proposed a \$215 million budget over three years¹⁴⁶; and (8) noted that certain audit recommendations would be better addressed during the implementation of the District SAFE Plan because the plans objectives differed from the original accelerated pipes plan.¹⁴⁷ The Order noted that the District SAFE Plan was deficient in describing the methodology for tracking GHG emissions reductions and strategies for minimizing stranded assets, and waived the requirement that the Plan comply with certain other directives in the Order since there were no established industry standards or clear regulatory benchmarks for those directives.¹⁴⁸ The Commission emphasized that while this determination allowed the case to proceed, it “should not be deemed a ruling that WGL’s SAFE application warrants approval.”¹⁴⁹

51. On brief, WGL continues to contend that the District SAFE Plan complies with the Commission’s directives in Order No. 22003 without violating Federal and District pipeline safety requirements and/or violating WGL’s Federally-secured obligation to provide natural gas service in the District.¹⁵⁰ WGL’s Brief points to the voluminous witnesses’ testimony (*i.e.*, Direct, Rebuttal, testimony in response to comments, Supplemental, Surrebuttal, JANA Supplemental, and JANA Rebuttal), exhibits, and responses to data requests that the Company produced to support its application.¹⁵¹ WGL states that the proposed District SAFE Plan demonstrates greater cost-effectiveness, fully addresses each item reflecting lessons learned as required by Order No. 22003 ¶¶ 51(a-r), and addresses the directives regarding the Continuum Management Audit.¹⁵²

¹⁴² Order No. 22367, ¶ 21.

¹⁴³ Order No. 22367, ¶ 20. *See* WGL A-1 (Rogers Direct) at Exhibit (A)-1 at 40-41.

¹⁴⁴ Order No. 22367, ¶ 21. The Company proposes to utilize the existing project list approval process. *See* Exhibit WG (C)-1 at 24 (Jacas Direct Testimony).

¹⁴⁵ Order No. 22367, ¶ 21.

¹⁴⁶ Order No. 22367, ¶ 21.

¹⁴⁷ Order No. 22367, ¶ 23.

¹⁴⁸ Order No. 22367, ¶ 22; the Commission determined that Paragraph 51(h), (j), (n), (o), (q), and (r) had no applicable industry standards.

¹⁴⁹ Order No. 22367, ¶ 16.

¹⁵⁰ WGL Brief at 31.

¹⁵¹ WGL Brief at 5-12. By Order No. 22752, and consistent with the Commission’s authority under 15 DCMR § 134.1, the Commission deemed as part of the evidentiary record all pre-filed testimony, exhibits, data responses, comments, affidavits, and admissions without further authentication, provided the sponsoring witness is identified in accordance with 15 DCMR § 122.13.

¹⁵² WGL Brief at 32-38.

i. Parties on 22003 Compliance: JANA, Risk Modeling, and Project Prioritization

52. OPC, DCG, and Sierra Club continue to argue, through witness testimony and post-hearing briefs, that WGL's Application fails to meet the requirements of Order No. 22003.¹⁵³ Specifically, OPC and DCG raise issues with the Order No. 22003 directive that the pipe replacement should target the highest-risk segments of the system and be based solely on pipe age and material type.¹⁵⁴ DCG states that pipe age and material are only two of the many inputs JANA uses to generate risk scores, and that WGL does not provide an answer to how much cast-iron and bare-steel pipe WGL intends to replace under the Plan.¹⁵⁵ In response, WGL argues that its plan uses an RRPD metric to prioritize the efficient replacement of qualifying vintage assets that pose the greatest risk.¹⁵⁶ The Company states that it "no longer breaks out its planned work into programs as it did in PROJECT *pipes*, but instead is focused on replacing eligible materials based upon the results of the JANA risk model and RRPD metric to maximize benefits and efficient removal of risk from the system."¹⁵⁷ WGL also counters DCG's suggestion that a "simplistic model based on age and material" could be used to obtain approximately the same results.¹⁵⁸ The Company argues that DCG's simplistic approach would not meet PHMSA requirements and runs contrary to PHMSA's best practices.¹⁵⁹

¹⁵³ SC Brief at 9. OPC's Brief at 22. DCG's Brief at 10.

¹⁵⁴ OPC Brief at 22-23. DCG's Brief at 13-14.

¹⁵⁵ DCG Brief at 14.

¹⁵⁶ WGL Brief at 35, *citing* Exhibit WG (C)-1 at 5 (Jacas Direct Testimony): "Washington Gas will utilize the JANA risk model to identify projects based on the risk reduced per dollar metric. In the event that the risk reduced per dollar is the same for one or more projects, their prioritization will be given to the replacement of smaller diameter pipe. This enhanced process will be documented in the Company's Program Implementation Plan." *See also* WG (31) at 3:4-4:4 (Murphy Direct Testimony). *See also* WGL's Brief at 48-49, 52-61: the SAFE Plan: (1) reduces risk on the natural gas system in an effective and cost efficient manner, over the three year period of the Plan; (2) appropriately prioritizes the removal and replacement of aging and aged high-risk, leak-prone pipe; and (3) the RR/\$ metric should continue to be used to prioritize projects for accelerated removal and replacement.

¹⁵⁷ WGL Brief at 35-36, *citing* WG (C) 14:6-10 (Jacas Direct Testimony).

¹⁵⁸ WG (2E) at 10:8-11 (Oliphant Rebuttal Testimony).

¹⁵⁹ WGL Brief at 25 and fn. 119, *citing* WG (2B) at 17:9-24-12 (Quarterman Rebuttal Testimony) (explained that repair techniques do not resolve the issues associated with high risk, leak prone pipe); WG (2B) at 20:14-16 (Quarterman Rebuttal Testimony) (highlighted specifically that PHMSA has reported to Congress that replacement is the only long-term solution to ensure pipeline integrity and, therefore, anything short of replacement is simply considered mitigation); WG (2D) at 18:20-19:4 (Stuber Rebuttal Testimony) (Witness Stuber testified that repairing of gas leaks satisfies a separate PHMSA requirement, but does not obviate the need to replace high-risk assets, and does not meaningfully extend the life of the repaired asset); WG (2E) at 3:4-9:2 (Oliphant Rebuttal Testimony) (explained that the Opposing Parties' proposals to risk modeling do not comply with PHMSA requirements), and WG (2E) at 9:5-16:7 (Oliphant Rebuttal Testimony) (explained how the JANA Lighthouse model complies with PHMSA requirements and best practices).

ii. Parties on 22003 Compliance: Alignment with District Climate Policy and Non-Pipeline Alternatives

53. OPC and DCG also argue that WGL's Application fails to meet Order No. 22003's directive requiring WGL's new Application to reflect a focused approach that demonstrates the critical balance between reductions in future leaks and GHG emissions against the risk of stranded assets as the District continues its energy transition.¹⁶⁰ DCG also argues that the Customer Choice Pilot is not designed to be an effective NPA and is missing many key elements.¹⁶¹ Sierra Club argues that WGL not only failed to make the required showing of any analysis of stranded assets, but it also apparently chose not to comply with the Commission's directives to consider stranded assets in its proposal.¹⁶² WGL responds to these arguments by asserting that the District SAFE Plan balances efficient risk reduction with the need to mitigate stranded asset cost risks through the Customer Choice Pilot Program.¹⁶³

54. OPC also argues that WGL fails to propose policies addressing the decommissioning of main pipelines.¹⁶⁴ WGL states that the arguments about decommissioning, replacing leak-prone infrastructure, GHG emissions, and the Company's federally secured obligation to provide natural gas service to District customers, are flawed assumptions about the rate, cost, and benefits of electrification in the District.¹⁶⁵ WGL argues that the parties' assumed pace and costs for electrification and decommissioning are flawed and lack a factual basis.¹⁶⁶ The Company argues that the parties failed to support their assumptions that a material and substantial number of customers will voluntarily cease the use of natural gas over the three-year period or long term.¹⁶⁷

55. DCG argues that the District SAFE Plan does not address the District's climate policies, while Sierra Club contends that the Plan does not strike a balance between safety,

¹⁶⁰ OPC Brief at 23; and DCG Brief at 12.

¹⁶¹ DCG Brief at 12-13.

¹⁶² SC Brief at 10-11.

¹⁶³ WGL Brief at 35, *citing* Exhibit WG (G) – Fang Direct at 26:5-29:13, indicating that concerns regarding the risk of stranded assets and the District's energy transition should not delay critical safety investments in WGL's system.

¹⁶⁴ OPC Brief at 23.

¹⁶⁵ WGL Brief at 96-97. WGL contends that the Commission should reject these arguments and instead recognize that District SAFE facilitates the mid- and long-term climate goals of the District as well as the short-, mid-, and long-term needs of Washington Gas's system and its customers.

¹⁶⁶ WGL Brief at 127. WGL's Brief points to examples cited by DCG and the Sierra Club witnesses that show the parties have overstated the efficacy of their proposals, and WGL notes that New York's experience (ConEd had 14 customers to convert to all electric use at a cost of \$742,830 or \$53,059 per customer) demonstrates the parties' witnesses assumed rates and costs of electrification are unrealistic.

¹⁶⁷ WGL Brief at 103.

reliability, and complying with D.C. climate laws and policies.¹⁶⁸ WGL contends that the Plan strikes the “critical balance between reductions in future leaks and GHG emissions against the risk of stranded assets as the District continues its energy transition.”¹⁶⁹ Sierra Club states that WGL failed to consider alternatives to replacement, such as cast-iron joint encapsulation, Cured-In-Place Liner (“CIPL”), and Cast Iron Sealing Robot (“CISBOT”).¹⁷⁰ Sierra Club also states that although WGL identified fifteen (15) miles of cast-iron main that could be retired at this time, it proposed no plans to do so.¹⁷¹

56. Sierra Club also argues that WGL failed to consider NPAs or any consideration of electrification in its analysis.¹⁷² WGL responds that NPAs should focus on the outermost portions of a gas distribution system, and this is what they have proposed in their Customer Choice Pilot Program.¹⁷³ WGL indicates that, because the District is still working on plans for full electrification, further extensive discussion with stakeholders is needed to better understand what role WGL can and should play in this process.¹⁷⁴

iii. Parties on 22003 Compliance: Program Scope

57. OPC and Sierra Club have concerns regarding the requirement in Order No. 22003 ¶ 51(f), regarding the lack of completion dates, and recommend requiring WGL to establish a timeline.¹⁷⁵ Sierra Club is concerned about what “further acceleration” means beyond 2027, and that at the current replacement rates, high-risk mains would not be retired until approximately 2150.¹⁷⁶ Also, OPC, DCG, and Sierra Club raised questions regarding requirement ¶ 51(m), the number of main replacements identified for the 3-year period. DCG questions whether the replacements fit a realistic strategy and notes that WGL has no viable pathway to replace all vintage pipes, nor does the Company propose to do so.¹⁷⁷ OPC notes that, at the proposed replacement pace, WGL would not eliminate cast iron until 2094, and proposes that WGL be directed to prepare a project list for the entire District SAFE Plan.¹⁷⁸ DCG notes that WGL has identified 15 miles of

¹⁶⁸ DCG Brief at 10-12. SC Brief at 11-15.

¹⁶⁹ WGL Brief at 34-35, *citing* Order No. 22003, ¶ 49.

¹⁷⁰ SC Brief at 15-16, *citing* SC (C) at 28:11 to 29:9 (Gas Technical Panel Direct Testimony).

¹⁷¹ SC Brief at 16, *citing* SC (C) at 29:7-9 (Gas Technical Panel Direct Testimony).

¹⁷² SC Brief at 17-19.

¹⁷³ WG (H) at 20:13-21 (Wemple Rebuttal Testimony).

¹⁷⁴ WG (A) at 11:20-12:6 (Whitacre Direct Testimony).

¹⁷⁵ OPC (A) at 18:6-19 (Fitzhenry Direct Testimony).

¹⁷⁶ SC (C) at 12:4-13:8 (Gas Technical Panel Direct Testimony). This assumes 477 miles remaining and uses a five-year average historic retirement pace.

¹⁷⁷ DCG (B) at 11:17-12:6 (Botwinick Direct Testimony).

¹⁷⁸ OPC (A) at 10:1-2 and 19:8-9 (Fitzhenry Direct Testimony).

cast-iron main segments for potential abandonment, but provides no timeframe for when this will occur.¹⁷⁹ WGL notes that the District SAFE Plan is only for three years and is not intended for long-term planning.¹⁸⁰ WGL asserts that the proposed replacement rate is limited by available funds from the Commission-approved surcharge.¹⁸¹

iv. Parties on 22003 Compliance: Continuum Audit Recommendations

58. OPC states that WGL fails to comply with the 21 Continuum Audit Recommendations, and specifically argues, among other things, that the Plan fails to develop and provide a fully resource-loaded schedule across all accelerated replacement programs.¹⁸² DCG generally argues that WGL has failed to provide an adequate analysis in response to the Audit Report recommendations.¹⁸³ PBWLDC recommends increased contractor staffing levels to “a minimum of 40 contractor crews to ensure WGL has the requisite skilled workforce to replace the highest-risk pipes.”¹⁸⁴ WGL’s counter to these arguments is that the District SAFE Plan agrees or partially agrees to accept and implement 19 of the 21 Audit recommendations and explained that it would not implement the remaining two recommendations because the Commission rejected them.¹⁸⁵

B. Cost Recovery Mechanism

59. WGL argues that accelerated cost recovery for pipeline replacement is necessary to conform with PHMSA’s ongoing Call to Action¹⁸⁶, upholding its obligation under District and federal law to provide safe and reliable gas service, and ensuring “a steady flow of cost recovery...so that it can continue safety work unabated while meeting all of the other functions that are subject to normal cost recovery through base rates.”¹⁸⁷ WGL proposes accelerated recovery through an APRP Surcharge for District SAFE, largely similar to that used in previous

¹⁷⁹ DCG (A) at 13:2-7 (Hopkins Direct Testimony).

¹⁸⁰ WG (2A) at 10:7-14 (Whitacre Rebuttal Testimony).

¹⁸¹ WG (C) at 39:20-40:6 (Jacas Direct Testimony).

¹⁸² OPC Brief at 23. *See* OPC (A) at 18:14-19 (Fitzhenry Direct Testimony).

¹⁸³ DCG (A) at 6:25-7:17 (Hopkins Direct Testimony).

¹⁸⁴ PBWLDC at 11:10-22 (Palomo Direct Testimony).

¹⁸⁵ WGL Brief at 34, *citing* Exhibit WG (C)-1 (Jacas Direct Testimony).

¹⁸⁶ The Commission notes that PHMSA safety requirements establish performance and compliance obligations but do not direct the use of any specific cost recovery mechanism to meet those obligations.

¹⁸⁷ WG (A) at 6:19-24 (Steffes Direct Testimony); WG (2B) at 14:5-8 (Quarterman Rebuttal Testimony); and WG (F) at 4:4-7 (Lawson Direct Testimony). *See also* WGL Brief at 24, *citing* 49 C.F.R. § 192.1007 and WGL Brief at 85-86, 91.

PIPES programs, arguing that it “has been successful in ensuring timely cost recovery.”¹⁸⁸ WGL explains that the APRP Surcharge is calculated using a cost-of-service methodology, with the annual level of replacement costs converted into an average rate base before calculating the costs included in the surcharge.¹⁸⁹ WGL states that the APRP’s continuation is necessary to retain the workforce necessary to complete the work directed, lest they otherwise be “lost to other jurisdictions.”¹⁹⁰

60. Several parties advocate for the complete rejection of the District SAFE Plan’s accelerated recovery mechanism. OPC asserts that WGL was negligent in its duty to maintain mains and services in its distribution system and should not recover a surcharge for its “exorbitant” accelerated replacement program.¹⁹¹ OPC states that WGL “has not demonstrated that it is reasonable or prudent to accelerate aging infrastructure replacement investment at this time,”¹⁹² and proposes replacing the District SAFE Plan with a program funded sans surcharge recovery, as “WGL is obligated to maintain system safety and reliability” with or without it.¹⁹³ The Sierra Club proposes that pipelines be replaced only when no other alternative is feasible, with cost recovery achieved through a standard rate case rather than advance surcharge recovery.¹⁹⁴ Should accelerated recovery be approved, Sierra Club offers an alternate path in which WGL is directed to perform work recovered through base rates at a pace of 25% of the work performed under the District SAFE Plan.¹⁹⁵

61. DCG also recommends rejecting the District SAFE Plan’s accelerated recovery mechanism completely, but only until WGL develops “an alternative gas safety capital plan that is consistent with District policy and takes financial sustainability and competition risks into account.”¹⁹⁶

62. In rebuttal, WGL argues against the stakeholders’ proposals, stating that none of them contest how the APRP Adjustment is calculated or implemented, only that it should be rejected.¹⁹⁷ WGL states that the Company “has and continues to underearn on its allowed return for its District operations”, and continuing accelerated work without accelerated funding “would

¹⁸⁸ WG (F) at 9:3-4 (Lawson Direct Testimony).

¹⁸⁹ WGL Brief at 95-96, citing WG (F) at 8:18-9:15 (Lawson Direct Testimony).

¹⁹⁰ WGL Brief at 84-86.

¹⁹¹ OPC Brief at 12-15.

¹⁹² OPC (A) at 23:4-6 (Fitzhenry Direct Testimony).

¹⁹³ OPC (A) at 23:12-13 (Fitzhenry Direct Testimony). *See also* OPC Brief at 3, 28.

¹⁹⁴ SC (A) at 4:1-7 (Pierce Direct Testimony). *See also* SC Brief at 5.

¹⁹⁵ SC (C) at 9:10-17 (Gas Technical Panel Direct Testimony).

¹⁹⁶ DCG (A) at 4:25-26 (Hopkins Direct Testimony); DCG (A) at 5:5-8 (Hopkins Direct Testimony).

¹⁹⁷ WG (2F) at 2:9-12 (Lawson Rebuttal Testimony).

further exacerbate” this underearning.¹⁹⁸ Furthermore, WGL asserts that returning to traditional rate-case recovery creates significant regulatory lag, which is unsuitable for an accelerated replacement program.¹⁹⁹ This process, WGL asserts, would necessitate annual rate case filings, further increasing administrative burden.²⁰⁰ WGL notes that forty-one jurisdictions in the United States, including the District, currently have programs supporting accelerated pipeline replacement, and that outright elimination of “appropriate funding of that accelerated replacement would position the District as an outlier[.]”²⁰¹

C. Program Budget

63. WGL proposes in its District SAFE Plan filing a \$215 million budget over the three-year program.²⁰² The Company’s proposed budgets for 2025, 2026, and 2027 are \$50 million, \$75 million, and \$90 million, respectively.²⁰³ WGL argues that the proposed budget amount “was set at a feasible level based on 2024 construction levels and desire to increase the pace of replacement.”²⁰⁴ WGL avers that the proposed budget amount “provides strategic direction for allocating District SAFE resources on a long-term basis.”²⁰⁵

64. Other parties disagree with WGL’s budget proposal. DCG and Sierra Club both advocate an approach based on pipeline repair and other alternatives to pipeline replacement.²⁰⁶ DCG states that WGL asks D.C. ratepayers to “bear the burden of an expanded \$215 million program that does not adequately manage the risk of stranded assets” and District SAFE is “simply a more expensive continuation of PROJECTpipes with fewer guardrails.”²⁰⁷ DCG argues that WGL “is not even selecting the most cost-effective projects in accordance with its own methodology.”²⁰⁸ DCG continues to state that WGL’s proposal does not expound on how it will spend the \$215 million budget, and that pipeline replacement “should be de-prioritized” for NPAs that “can more cost-effectively service customers while maintaining system reliability and safety

¹⁹⁸ WG (2F) at 3:17-21 (Lawson Rebuttal Testimony); WG (2F) at 5:1-10 (Lawson Rebuttal Testimony).

¹⁹⁹ WGL (F) at 4:12-23 (Lawson Direct Testimony).

²⁰⁰ WG (F) at 7:16-21 (Lawson Direct Testimony).

²⁰¹ WG (F) at 8:8-9 (Lawson Direct Testimony). *See also* WGL’s Brief at 85.

²⁰² Exhibit WG (A)-1 at 30 (Whitacre Direct Testimony).

²⁰³ WGL Brief at 93, *citing* Exhibit WG (A)-1 at 30 (Whitacre Direct Testimony).

²⁰⁴ Exhibit WG (A)-1 at 30 (Whitacre Direct Testimony).

²⁰⁵ WGL (C) at 24:5-6 (Jacas Direct Testimony).

²⁰⁶ DCG (A) at 34:7-35:8 (Hopkins Direct Testimony); SC (A) at 4:1-7 (Pierce Direct Testimony).

²⁰⁷ Exhibit DCG (B) at 3:5-9 (Botwinick Direct Testimony); DCG Brief at 1.

²⁰⁸ DCG Brief at 21.

requirements.”²⁰⁹ Sierra Club has concerns that the budget WGL proposes is an “enormous” level of spending for “minimal leak-prone pipe retirements...above historical retirements.”²¹⁰ Sierra Club argues the District SAFE Plan is not the most cost-effective solution, notes the increasing cost-per-mile for replacement activity, recommends repair and electrification as cost-effective and scalable alternatives, and states that WGL has failed to show that it has considered said alternatives.²¹¹

65. OPC specifically argues for reducing the District SAFE Plan budget from \$215 million to \$150 million, and maintaining the same three-year cap as PIPES 2.²¹² OPC argues that WGL is utilizing the same fundamental approach with the District SAFE Plan as PIPES 2 and thus is requesting “additional expenditures” to accomplish “the same tasks” or less than under the PIPES 2 plan “despite its multi-decade inability to fulfill its obligations to the ratepayers[.]”²¹³ OPC argues that WGL should be challenged to improve its replacement efficiency over historical levels before being granted greater funding than previous programs.²¹⁴

66. WGL disagrees with the stakeholders’ criticisms of its proposed budget. WGL states that OPC’s \$50 million per year “underfunds” them and “offers no consideration for issues such as inflation, prevailing wages, and jurisdictional challenges...”,²¹⁵ while calling DCG’s cost comparison between the Plan and its alternative analysis “far-reaching forward projection using a simplified set of selected variables and assumed inputs, while holding all else constant.”²¹⁶ WGL goes on to state that “by limiting the analysis to just its selected variables,” DCG “grossly misrepresents the future state of utility service” in a way that is “biased against Washington Gas.”²¹⁷

67. Multiple stakeholders point out that WGL’s pipeline replacement activity in the District has been markedly less efficient than in jurisdictions of comparable infrastructure and development.²¹⁸ WGL responds by pointing to District-specific policies and regulations as drivers

²⁰⁹ DCG (A) at 13:19-23 (Hopkins Direct Testimony); Exhibit DCG (B)-3 Attachment A at 2 and 4 (Botwinick Direct Testimony). *See also* DCG Brief at 17.

²¹⁰ SC (C) at 18:18-19:4 (Gas Technical Panel Direct Testimony).

²¹¹ SC (B) at 3:9-13 and 3:18-4:2 (Lyman Direct Testimony); SC (A) at 8:23-9:3 (Pierce Direct Testimony); and SC’s Brief at 4.

²¹² OPC (A) at 21:10-12 (Fitzhenry Direct Testimony). *See also* OPC Brief at 27.

²¹³ OPC (A) at 20:9-11 (Fitzhenry Direct Testimony); OPC Brief at 19.

²¹⁴ OPC (A) at 22:7-9 (Fitzhenry Direct Testimony). *See also* OPC Brief at 2.

²¹⁵ WG (2F) at 7:11-8:4 (Lawson Rebuttal Testimony); WGL Brief at 94.

²¹⁶ WG (2F) at 8:18-20 (Lawson Rebuttal Testimony).

²¹⁷ WG (2F) at 9:7-9 (Lawson Rebuttal Testimony).

²¹⁸ DCG (A) at 18:19-21 (Hopkins Direct Testimony); SC (A) at 15:3-5 (Pierce Direct Testimony); and OPC (A) at 8:10-13 (Fitzhenry Direct Testimony).

of those costs, such as DDOT's restrictions on construction time or difficulties securing work permits.²¹⁹ Miller Pipeline echoes this point in its testimony.²²⁰ OPC claims WGL is "falsely blam[ing] *pre*-PIPES regulations for its snail-pace accelerated replacement" and not identifying "any concrete solutions to these purported impediments",²²¹ while WGL avers that it has "committed to significant stakeholder involvement with DDOT" to advocate for changes in regulations that "would lead to lower costs through longer crew work hours and lower administrative burdens[.]"²²² DDOT itself states that the restrictions WGL refer to as adding cost and/or delay have been in place for "years, even decades."²²³

D. JANA, Risk Modeling and Project Selection

68. WGL defends JANA's use, stating it is reasonable, effective, and compliant with PHMSA's best practices.²²⁴ WGL explains that Optimain is no longer supported after 2023 and that JANA was selected to replace it, after scoring highest in technical and risk modeling capabilities.²²⁵ According to WGL, JANA's superiority to Optimain was demonstrated during a comparison from November 2021 to October 2022.²²⁶ WGL defends its annual project list planning procedure by stating that JANA is implemented in a manner that complements annual timelines, and the parties gave no concrete evidence of any inefficiencies it would cause.²²⁷ WGL states that JANA is used by 36 utilities across 41 jurisdictions in the United States, and that it addresses PHMSA's requirements in 49 CFR 192, which require operators to have knowledge of their systems, identify threats, and implement measures to address risks.²²⁸

69. Parties are split on the viability of JANA. OPC argues WGL has not proved JANA is superior to Optimain, the risk assessment tool WGL used previously, only that it can identify more leaks, not necessarily higher risk segments.²²⁹ OPC criticizes WGL's prioritization approach

²¹⁹ Exhibit WG (A)-1 at 21-27 (Whitacre Direct Testimony). *See also* WGL Brief at 63.

²²⁰ Miller Pipeline at 1-2 (Bracht Direct Testimony).

²²¹ OPC Brief at 15; OPC (A) at 12:14-13:1 (Fitzhenry Direct Testimony).

²²² Exhibit WG (A)-1 at 27 (Whitacre Direct Testimony). *See also* WGL Brief at 66.

²²³ DDOT Comments at 1-2. *See also* DCG Brief at 18.

²²⁴ WGL Brief at 39.

²²⁵ WGL Brief at 40-42, *citing* WG (D) at 3:21-4:5, 5:24-6:2, and 7:6-13 (Stuber Direct Testimony).

²²⁶ WGL Brief at 44, *citing* WG (2D) at 8:20-9:4 (Stuber Rebuttal Testimony).

²²⁷ WGL Brief at 43, *citing* WG (2D) Stuber Rebuttal at 6:7-11 (Stuber Rebuttal Testimony).

²²⁸ Transcript at 121:7-12; WGL Brief at 41-42, *citing* WG (E) at 5:11-16 (Oliphant Direct Testimony).

²²⁹ OPC (A) at 19:1-2 (Fitzhenry Direct Testimony); OPC (2A) at 3:18-20, 4:1-5, 4:7-9 (Fitzhenry Supplemental Testimony).

by stating it proposes no strategy to target and replace super-emitter leaks and ensure a reduction in GHG emissions.²³⁰ OPC wants WGL to use historical data to demonstrate that it reduces more risk for the cost.²³¹ OPC also has concerns with JANA's annual revisions, stating they will lead to delays and inefficiencies, and instead recommends that WGL produce a project list for the entirety of the District SAFE Plan, adjusting as necessary and subject to review and approval.²³² Finally, OPC claims that 32 of over 1,000 gas utilities in the United States have adopted JANA, and that it overestimates leaks and identifies unnecessary replacements.²³³

70. DCG, while conceding that JANA reduces risk close to the practicable maximum given WGL's investment, and that it is reasonable to use JANA-based estimates for evaluating WGL's project selection process, warns that the cost data it utilizes are rough estimates subject to shifting before Class 3 estimates are produced, leading to questionable cost-effectiveness.²³⁴ DCG also argues that JANA overstates risk reduction by including risk to investors and focusing on the risk of catastrophic events that cause acute harm through remediation, reputation, and fines, rather than cumulative environmental risk and societal cost.²³⁵ Both DCG and OPC recommend an alternative approach to JANA that prioritizes infrastructure age and material type over RRPD, on the basis that it would be reasonably as effective but more "narrowly focused" on the highest-risk segments, thereby conforming closer to Order No. 22003.²³⁶ DCG warns that an RRPD approach over its suggested materials-based approach will cause WGL to only replace services on an otherwise eligible main if that main is also replaced, leading to cast-iron mains taking decades to reach the top of the priority list.²³⁷ To alleviate this, DCG recommends provisions within the District SAFE Plan requiring the replacement of certain material types.²³⁸ Finally, DCG has concerns regarding the consistency of WGL's project ranking system overall and recommends that the Commission require more transparency of WGL by directing clear lists of all projects that were considered, the ID's of each project selected for the project list, and explanations for why WGL rejected or deferred otherwise high-ranking projects for a given list.²³⁹

²³⁰ OPC Brief at 25.

²³¹ OPC (A) at 19:15-21 (Fitzhenry Direct Testimony).

²³² OPC (A) at 18:10-14 and 19:8-14 (Fitzhenry Direct Testimony).

²³³ OPC Brief at 24, citing Hearing Transcript at 121:7-12.

²³⁴ DCG (A) at 21:21 (Hopkins Direct Testimony); DCG (2A) at 8:26-27 (Hopkins Rejoinder Testimony); and DCG Brief at 20-22.

²³⁵ DCG Brief at 23-30.

²³⁶ DCG (A) at 15:13-16:12 (Hopkins Direct Testimony); DCG Brief at 13-14; and OPC's Brief at 22-23.

²³⁷ DCG (2A) at 13:3-7 (Hopkins Rejoinder Testimony).

²³⁸ DCG Brief at 17.

²³⁹ DCG (2A) at 9:17-22 and 11:25-12:2 (Hopkins Rejoinder Testimony).

71. Both PBWLDC and Sierra Club support the use of JANA, with the former stating it addresses the Commission's concerns about project selection and prioritization, and the latter stating the move to RRPD metrics should result in further reductions of leaks and failures.²⁴⁰ Sierra Club goes on to state that while WGL's initial validation of JANA is sufficient for pre-deployment, it should be carefully scrutinized if and when it is put into practice.²⁴¹

E. Annual Project List Submission

72. OPC expresses concerns regarding the eight-month lag between model calibrations and project list development, as it could lead to projects selected using stale data.²⁴² This concern over stale data extends to WGL's use of leak data reaching back five years.²⁴³ Sierra Club is split on WGL's usage of geographic grouping in the event services are not connected to any leak-prone pipe. While it agrees that this method can lead to more efficient replacement of stranded assets, it is unclear if the geographic zones themselves are small enough to disaggregate risk across certain areas.²⁴⁴

73. WGL supports its prioritization methodology by stating that the annual project list requires an extended design and engineering cycle, that it cannot immediately generate a project list when new data becomes available, and that the iterative updates of the system assets throughout the modeling process ensure data does not become too stale.²⁴⁵ WGL reiterates that its project prioritization methodology, including the use of five-year data periods and the use of RRPD metrics, reflects a PHMSA-endorsed industry standard of practice.²⁴⁶

74. WGL has stated that the District SAFE Plan will follow the same procedure as previous PIPES plans with project list review.²⁴⁷ This process is as follows: 1) The Commission sets a budget cap for the given plan period (in District SAFE's case, a year); 2) WGL files a proposed project list within fifteen (15) days ; 3) the stakeholders then have three (3) days to file Data Requests pertaining to the proposed project list and fifteen (15) days to file comments in response to the list; and 4) the APRP projects are rolled into a base rate case proceeding.²⁴⁸ DCG has taken issue with the review process in the past, and does so here for the District SAFE Plan,

²⁴⁰ PBWLDC at 11:8-10 (Palomo Direct Testimony); SC (C) at 23:9-13 (Gas Technical Panel Direct Testimony); and SC (C) at 24:12-13 (Gas Technical Panel Direct Testimony).

²⁴¹ SC (C) at 24:7-12 (Gas Technical Panel Direct Testimony).

²⁴² OPC (3A) at 5:14-17 (Fitzhenry Supplemental Testimony).

²⁴³ OPC (3A) at 4:8-5:4 (Fitzhenry Supplemental Testimony). *See* WGL Brief at 47.

²⁴⁴ SC (C) at 24:17– 25:2 (Gas Technical Panel Direct Testimony).

²⁴⁵ WG (A)-1 at 38-39 (Whitacre Direct Testimony); WGL (4E) at 2:10-17 (Oliphant Rejoinder Testimony).

²⁴⁶ WGL Brief at 57, *citing* WG (D) at 3:21-4:5 (Stuber Direct Testimony).

²⁴⁷ WG (C) at 24:6-11 (Jacas Direct Testimony).

²⁴⁸ DCG Brief at 35.

calling it “structurally lopsided.”²⁴⁹ According to DCG, the JANA risk model ranks projects using a prioritization method that is unreasonable because it is based on faulty assumptions.²⁵⁰ DCG argues that by the time the APRP projects are up for prudency review in the applicable rate case, they are buried under a docket with thousands of pages of competing issues.²⁵¹ DCG recommends that project lists are reviewed before that year’s surcharge budget cap is approved, that the project list review period be extended from three (3) and fifteen (15) days to fifteen (15) and forty-five (45) days, respectively, and provide risk ranking, unit costs, pipe material, leak history, project timelines, Class 3 estimates, and an explanation of NPA consideration for each BCA²⁵² in a given project list.²⁵³

F. Alignment with District Climate Goals

75. According to WGL, the District SAFE Plan considers the District’s climate policies to achieve carbon neutrality and climate resilience by 2045, with an accelerated mandate for the District Government to make its operations carbon neutral by 2040.²⁵⁴ The Company asserts that carbon “neutral is not synonymous with electrification and that natural gas consumption in the District in the buildings and energy sector continues to account for much lower GHG emissions and lower combustion-related emissions per energy unit profile than electricity’s associated with emissions in the same sector.”²⁵⁵ According to WGL, the District SAFE Plan supports the District’s climate goals by focusing on reducing methane emissions and ensuring short-term and long-term safety and reliability.²⁵⁶ The Company notes that, nationally, main replacement activities are among the most effective means of reducing a utility’s direct operational emissions.²⁵⁷ WGL suggests that since the PROJECT*pipes* implementation in the District from 2014 through 2023, pipe replacement has enabled an average annual reduction in GHG emissions of approximately 690 metric tons of carbon dioxide equivalent emissions.²⁵⁸ The Company maintains that the District SAFE Plan will deliver GHG emissions-reduction benefits.²⁵⁹

²⁴⁹ *Formal Case No. 1154*, District of Columbia Government’s Comments on Washington Gas Light Company’s Updated Project List, at 5-6, filed May 28, 2025. *See also* DCG Brief at 35.

²⁵⁰ DCG Brief at 28.

²⁵¹ DCG Brief at 35.

²⁵² Business Case Analysis (“BCA”) is a term used by WGL to refer to individual projects in a proposed Project List.

²⁵³ DCG Brief at 35-36.

²⁵⁴ Exhibit WG (A)-1 at 31 (Whitacre Direct Testimony).

²⁵⁵ Exhibit WG (A)-1 at 31 (Whitacre Direct Testimony).

²⁵⁶ WG (E) at 16:8-11 (Oliphant Direct Testimony). *See also* WGL Brief at 96.

²⁵⁷ Exhibit WG (A)-1 at 32 (Whitacre Direct Testimony).

²⁵⁸ Exhibit WG (A)-1 at 32 (Whitacre Direct Testimony).

²⁵⁹ Exhibit WG (A)-1 at 32 (Whitacre Direct Testimony).

76. Specifically, WGL claims that the District SAFE Plan uses the JANA risk model to target the most leak-prone assets, thereby effectively reducing GHG emissions by preventing future leaks.²⁶⁰ The Company notes that the prioritization process provides asset-specific forecasts, identifying assets within the surcharge-eligible population with the highest potential for future leaks, which are further differentiated based on risk removed to align with PHMSA's safety standards and best practices requirements for managing system risk.²⁶¹

77. WGL asserts that, through future replacement projects that will complete the replacement of vintage materials, it will cut annual direct Scope 1 fugitive emissions from distribution mains and services from approximately 66,300 to 5,300 metric tons of carbon dioxide equivalent, representing about a 92% reduction.²⁶² The District SAFE Plan notes that if the current pace of accelerated investment in pipe replacement is continued for the next 30 years, it would result in a total compounded cumulative reduction of approximately 830,000 metric tons of carbon dioxide equivalent.²⁶³ With further acceleration and modernization as proposed by the District SAFE Plan, newer, less risky, or less leak-prone pipe materials would assist in safely facilitating the transportation of certain renewable and lower carbon intensity fuel types in the District.²⁶⁴

78. WGL avers that “these newer pipe materials could [] enable a District-wide affordable, equitable, and resilient transition to: alternative energy carrier fuels such as hydrogen; and/or enable gradual transitions to networked geothermal in areas further assessed as simultaneously prime for main and service retirement and geothermal deployment.”²⁶⁵ The Company believes that, inherently, the District SAFE Plan will help to accelerate the modernization of the District's underground pipeline infrastructure and supports the District's goals to become carbon neutral.²⁶⁶

²⁶⁰ WG (E) at 17:9-14 and 16-18 (Oliphant Direct Testimony).

²⁶¹ WG (E) at 17:12-16 (Oliphant Direct Testimony).

²⁶² Exhibit WG (A)-1 at 34 (Whitacre Direct Testimony). This estimate assumes a future distribution mains inventory of 900 miles of plastic main, about 320 miles of protected steel main, and about 125,000 plastic distribution services using the appropriate carbon dioxide equivalent emission factors for distribution materials specified in *Formal Case No. FC 1162* WGL Annual GHG Emissions Report, covering CY2023 Commission Data Request No. 9 to WGL. June 28, 2024 (Emission factors as translated: 1,473 kgCO₂e/yr/mile and 4,757 kgCO₂e/yr/mile for protected steel and plastic main, respectively and 4 kgCO₂e/yr/service for plastic service). *Id.*

²⁶³ Exhibit WG (A)-1 at 34 (Whitacre Direct Testimony).

²⁶⁴ Exhibit WG (A)-1 at 36 (Whitacre Direct Testimony). The Plan notes that the emissions-reduction estimates reflect current operational emissions and do not include the much higher potential reductions achievable with a system using modern pipe material. *Id.*

²⁶⁵ Exhibit WG (A)-1 at 36-37 (Whitacre Direct Testimony).

²⁶⁶ Exhibit WG (A)-1 at 37 (Whitacre Direct Testimony).

79. According to WGL, “there is no single method of tracking estimated leak reductions and GHG emission reductions that considers actual condition, previous leaks, and pipe material.”²⁶⁷ The Plan notes that JANA does consider some of these factors, but that the Company is unaware of an accounting methodology that calculates reductions based on the factors identified by the Commission.²⁶⁸ WGL contends that not only was there not enough time for the Company to develop its own new methodology to consider actual conditions, but that because there would be moving targets (e.g., location, concentration, volume, grade of leaks) it would provide little if any benefits while requiring significant resources.²⁶⁹ WGL notes that the Company is awaiting new PHMSA regulations on Advanced Leak Detection (“ALD”) deployment, which may provide guidelines on use and on measuring and calculating emissions to determine GHG emissions reductions.²⁷⁰

80. WGL argues that “the work contemplated by District SAFE Plan [] (a) helps the District achieve [the climate] goal s, (b) maintains and improves the short- and long-term safety and reliability of [WGL’s] distribution system in the District, and (c) ensures that [WGL] will continue to provide customers with safe and reliable gas service so long as they continue to choose to obtain such service.”²⁷¹

81. OPC, DCG, and the Sierra Club all argue that the District SAFE Plan is inconsistent with the District’s efforts to achieve its climate goals.²⁷² OPC claims that the District SAFE Plan fails to propose a targeted strategy to replace potential super-emitter leaks to ensure direct reductions in GHG emissions.²⁷³ DCG claims that it cannot evaluate whether using JANA will address the Commission’s climate directive because WGL has not provided sufficient information about the model, limiting transparency into how JANA handles GHG emissions.²⁷⁴ The parties believe that WGL has only minimally addressed requirements to show that the Plan considers alternatives to replacement, aims to minimize the risk of stranded assets, seeks to coordinate with electrification programs, and proposes new methods for tracking leaks and GHG emissions.²⁷⁵

²⁶⁷ WGL Brief at 101, citing WG (2C) at 17:13-18:2 (Jacas Rebuttal Testimony). *See also* WG (C) 17:15-17 (Jacas Direct Testimony).

²⁶⁸ WGL Brief at 101, citing WG (2C) at 17:13-18:2 (Jacas Rebuttal Testimony). *See also* WG (C) 17:17-21 (Jacas Direct Testimony).

²⁶⁹ WG (C) at 17:21-18:7 (Jacas Direct Testimony).

²⁷⁰ WGL Brief at 101-102.

²⁷¹ WGL Brief at 96.

²⁷² OPC (A) at 5:10-14 (Fitzhenry Direct Testimony); DCG (B) at 11:8-12:3 (Botwinick Direct); SC (A) at 5:9-10 (Pierce Direct Testimony); and SC (B) at 3:9-10 (Lyman Direct Testimony).

²⁷³ OPC Brief at 25.

²⁷⁴ DCG Brief at 14. DCG (B) at 9:22-10:1 (Botwinick Direct Testimony).

²⁷⁵ DCG (B) at 3:2-11 (Botwinick Direct Testimony); and SC (A) at 3:21-24 (Pierce Direct Testimony). *See also* SC Brief at 9-10.

82. OPC challenges WGL's claim that, in order for the Company to identify actual GHG emissions reduction, it will need to wait for the completion of industry research on how to calculate actual GHG emissions reductions.²⁷⁶ OPC argues that WGL could use "an analytical approach that considered the mains and services being replaced, determined the likelihood of leak development based on the type and vintage of pipe, and then multiplied that probability by the expected GHG emissions from that segment type, [which] would have met the Commission's criteria for a GHG emissions analysis."²⁷⁷ The Sierra Club recommends that: (1) WGL pursue alternatives to pipe replacement, such as geothermal and managed electrification,²⁷⁸ and (2) the Commission consider financial incentives to promote NPAs, such as on-site gas storage and methane capture, that are financially beneficial to WGL and aligned with the District's climate policies.²⁷⁹ The Sierra Club and DCG also argue that the only way to help achieve the District's climate goals is to stop providing natural gas service and to facilitate electrification.²⁸⁰

i. Alternative Techniques and Non-Pipe Alternatives

83. By Order No. 22003, WGL was required to, "identify techniques, technologies, strategies, or other options the Company considered to reduce the leak rates and risk of the aging leak-prone pipes in the distribution system."²⁸¹ WGL contends that "[NPAs] are cost-effective solutions that defer or avoid the need for traditional removal and replacement of existing natural gas pipeline infrastructure, and do not compromise overall system integrity."²⁸² The Company indicates that stakeholders convened several meetings to discuss a broad range of topics, including NPAs, electrification, and coordination efforts with the District Government.²⁸³

84. The Company seeks approval of the District SAFE Plan proposal regarding NPAs and the Customer Choice Program for potential customer transition to electrification and to mitigate stranded assets. WGL argues that NPAs are alternatives to replacement, so any proposal

²⁷⁶ OPC Brief at 25, *citing* WG (2A) (Jucas) at 9, Figure 1. *See also* WG (2C) at 11-13 (Jacas Rebuttal Testimony).

²⁷⁷ OPC Brief at 25, *citing* OPC (2A) at 7:4-8 (Fitzhenry Supplemental Testimony).

²⁷⁸ SC Brief at 15. *See also* SC (A) at 21:21-24 and 22:3-23 (Pierce Direct Testimony); SC (B) at 2:6-19 (Lyman Direct Testimony).

²⁷⁹ SC (A) at 23:7-11 (Pierce Direct Testimony).

²⁸⁰ DCG (B) at 3:19-4:3 (Botwinick Direct Testimony); and SC (B) at 2:15-19 (Lyman Direct Testimony).

²⁸¹ Order No. 22003, ¶ 51 (p).

²⁸² WGL Brief at 119. "NPAs can be broadly defined as solutions that defer or avoid the need for traditional natural gas capital pipe replacement project to address system needs. These measures may be deployed where non-gas supply alternatives are more cost effective than traditional natural gas capital projects and do not compromise overall system integrity." *Id.* at 119-120, *citing* Exhibit WG (2A) at 50:19-51:-1 (Whitacre Rebuttal Testimony).

²⁸³ WG (A) at 12:11-20 (Whitacre Direct Testimony).

that does not permanently remove leak-prone pipe is not an NPA.²⁸⁴ Specifically, WGL asserts that its Customer Choice Program and the Company's continued consideration of abandonment projects without replacement are NPAs.²⁸⁵

85. WGL criticizes the opposing parties' view that leak repair efforts, such as CIPL, CISBOT, joint encapsulation, and similar approaches, constitute NPAs, arguing that such activities cannot constitute an NPA because they neither reduce system risks nor permanently remove leak-prone pipes.²⁸⁶ According to WGL, the parties' proposed NPAs do not address the safety concerns raised by PHMSA's Call to Action, which requires operators to take extraordinary measures beyond merely plugging leaks to ensure system safety.²⁸⁷ The Company claims that the parties' proposed alternative technologies are inadequate and constitute temporary mitigative measures.

86. WGL asserts that the Company has not identified its role in the District's electrification process since the District has yet to solidify its electrification plans.²⁸⁸ WGL points out that critical questions remain unresolved, including the Company's role in the electrification process, the cost implications for customers, and how those costs would be managed through the Commission's ratemaking process.²⁸⁹ The Company emphasizes that "further extensive discussion with stakeholders is needed" to move beyond preliminary talks and achieve meaningful coordination.²⁹⁰

87. WGL rebuts the parties' testimony and arguments related to: (1) the ability of NPAs to reduce the size of the natural gas system in the District; (2) the need for and feasibility of the full electrification of all users of the natural gas distribution system in the District; and (3) the associated cost and the resulting impact on emissions from this action.²⁹¹ WGL argues that there are significant flaws in the assumptions and conclusions drawn from each party's direct testimony regarding the limitations of NPAs in encouraging customers to cease using natural gas and abandon gas services.²⁹²

²⁸⁴ WGL Brief at 120.

²⁸⁵ WGL Brief at 120. WG (2A) at 46:22-47:5 and 51:8-18 (Whitacre Direct Testimony).

²⁸⁶ WGL Brief at 120-123. *See also* WG (2D) at 21:1-15 (Stuber Rebuttal Testimony).

²⁸⁷ WGL Brief at 120-121. *See* 49 CFR §§ Subpart P and Subpart O. *See also* WG (B) at 18:3-8 (Quarterman Direct Testimony); WG (2E) at 4:4-25 (Oliphant Rebuttal Testimony); and WG (2D) at 10:10-17 and 12:7-14 (Stuber Rebuttal Testimony).

²⁸⁸ WG (A) at 11:24-12:6 (Whitacre Direct Testimony).

²⁸⁹ WG (A) at 12:23-13:11 (Whitacre Direct Testimony).

²⁹⁰ WG (A) at 11:25-12:6 (Whitacre Direct Testimony).

²⁹¹ WG (H) at 3:7-18 (Wemple Rebuttal Testimony).

²⁹² WGL Brief at 29, citing WG (2B) at 9:5-15 (Quarterman Rebuttal Testimony).

88. DCG states that WGL has not proposed any effective NPAs in its filing.²⁹³ DCG argues that prudent investments in a gas distribution system should account for and consider NPAs.²⁹⁴ DCG contends that NPAs are relevant to this proceeding despite WGL's contention that the correct forum for discussing them is *Formal Case No. 1167*.²⁹⁵ DCG asserts that the Commission, in Order No. 22003, directed WGL to consider alternatives to pipe replacement in its plan.²⁹⁶ DCG argues that the Commission should direct WGL to develop a comprehensive NPA framework that, at a minimum, requires WGL to demonstrate that an expansion or replacement project could not be avoided through an NPA.²⁹⁷

89. DCG challenges WGL's statement that replacing a single service line that only serves one building will cost \$35,000.²⁹⁸ DCG points to the National Grid NPA incentive program for New York residential customers, which shifts infrastructure expenses to offer customers \$10,000 or more to help convert to cleaner heating and cooling options as an example of an NPA WGL could look to.²⁹⁹ DCG suggests that the Commission should establish a threshold cost for service line replacement (*i.e.*, \$30,000) over which an NPA must be implemented.³⁰⁰ DCG recommends that a service line NPA pilot program be developed following appropriate consultation among interested parties.³⁰¹ According to DCG, the Commission should direct WGL to utilize a comprehensive NPA framework modeled on states like Massachusetts and New York, which consider a broad range of NPAs.³⁰² Lastly, the Commission should convene a working group to discuss and develop a proposal.³⁰³

90. The Sierra Club asserts that WGL's proposal fails to include coordinated electrification and NPA alternative solutions with specific emissions reduction targets consistent with the District's emissions reduction mandates (such as through implementing [NPAs] or targeted repairs at a fraction of the cost.³⁰⁴ The Sierra Club proposes that the Commission require

²⁹³ DCG Brief at 4-5, 12. *See also* DCG (A) at 10:7-8 (Hopkins Direct Testimony).

²⁹⁴ DCG (A) at 50:29-51:3 (Hopkins Direct Testimony).

²⁹⁵ DCG (B) at 17:5-8 (Botwinick Direct Testimony).

²⁹⁶ DCG (B) at 17:8-12 (Botwinick Direct Testimony).

²⁹⁷ DCG (B) at 22:7-9 (Botwinick Direct Testimony).

²⁹⁸ DCG Brief at 34. *See also* DCG (B) at 23:9-11 (Botwinick Direct Testimony). Witness Botwinick noted that the cost to electrify a single-family home often falls between \$10,000 and \$30,000, even lower with government incentives. *Id.*

²⁹⁹ DCG (B) at 22:14-23:2 (Botwinick Direct Testimony).

³⁰⁰ DCG Brief at 34.

³⁰¹ DCG Brief at 33. *See also* DCG (B) at 24:11-13 (Botwinick Direct Testimony).

³⁰² DCG (B) at 24:16-20 (Botwinick Direct Testimony).

³⁰³ DCG (B) at 24:21-22 (Botwinick Direct Testimony).

³⁰⁴ SC Brief at 5. *See also*, SC's Brief at 15-16. WGL did not consider alternatives to replacement.

WGL to pursue alternatives like electrification, geothermal heating, energy efficiency measures, demand response programs, ALD, on-site gas storage, and methane capture.³⁰⁵ Where full NPAs are impossible, the Sierra Club recommends that the Commission require pipeline rehabilitation and repair rather than replacement, citing them as significantly quicker and lower in cost for ratepayers.³⁰⁶ According to the Sierra Club, managed electrification is cost-effective and would yield significant emissions reductions as compared to WGL's business-as-usual approach.³⁰⁷

91. To rebut WGL's position regarding wholesale replacement, the Sierra Club Witnesses Pierce, Walker, and Crowley (Walker and Crowley, collectively, the "Gas Technical Panel") identified more cost-effective PHMSA-approved alternative methods for reducing risks posed by leak-prone pipe, which the Company could have considered to achieve the same goals.³⁰⁸ The witnesses highlighted that: (1) WGL had failed to include a granular analysis of opportunities for "pipeline repairs, as opposed to replacements, in locations where electrification or geothermal projects are infeasible, and NPAs are not adequate to mitigate the risks of gas leakage";³⁰⁹ (2) pipeline repairs are considerably lower cost for ratepayers than wholesale replacement";³¹⁰ (3) "the one-time cost of [pipeline] repairs to ratepayers" is "between one-tenth and one-hundredth of the cost of pipeline replacement";³¹¹ and (4) CIPL, cast iron joint capsulation, cast iron sealing, or other technologies.³¹²

92. The Sierra Club argues that there is serious doubt as to the prudence of WGL's approach, and to support this premise, it notes: (1) the cost-effectiveness of cast iron joint encapsulation used by similar gas utilities;³¹³ (2) the use of CIPL across the country to remediate pipe material similar to WGL's;³¹⁴ (3) and the use of CISBOT technology to achieve results at nearly half the cost.³¹⁵ On brief, the Sierra Club continues to maintain that the District SAFE Plan fails to: (1) propose a plan for decommissioning of the 15 miles of cast-iron main that it noted

³⁰⁵ SC (A) at 23:7-11 (Pierce Direct Testimony).

³⁰⁶ SC (A) at 23:17-21 (Pierce Direct Testimony); SC (C) at 27:12-15 (Gas Technical Panel Direct Testimony).

³⁰⁷ SC Brief at 17, *citing* SC (A) at 17:4-21:4 (Pierce Direct Testimony).

³⁰⁸ SC Brief at 16, *citing* SC (C) at 26:12-20 (Gas Technical Panel Direct Testimony).

³⁰⁹ SC Brief at 15, *citing* SC (A) at 23:17-23 (Pierce Direct Testimony).

³¹⁰ SC Brief at 15, *citing* SC (A) at 23:17-23 (Pierce Direct Testimony).

³¹¹ SC Brief at 15-16, *citing Formal Case No. 1175, WGL's Application for Approval of PROJECTpipes III Plan*, D.C. Dep't of Energy & Env't, Strategic Electrification in Washington, D.C.: Neighborhood Case Studies of Transition from Gas to Electric-based Building Heating at 6 (Dec. 14, 2022).

³¹² SC Brief at 16, *citing* SC (C) at 26:12-20 (Gas Technical Panel Direct Testimony).

³¹³ SC Brief at 16, *citing* SC (C) at 28:11 to 29:2 (Gas Technical Panel Direct Testimony).

³¹⁴ SC Brief at 16, *citing* SC (C) at 29:3-6 (Gas Technical Panel Direct Testimony).

³¹⁵ SC Brief at 16, *citing* SC (C) at 29:7-9 (Gas Technical Panel Direct Testimony).

could be retired at this time;³¹⁶ (2) consider NPAs or electrification; and (3) proposes a business-as-usual approach rather than managed electrification, which is cost-effective and results in significant emissions reductions.³¹⁷

ii. Customer Choice Program, Stranded Assets, Electrification

93. WGL states that in Order No. 22003, the Commission directed that any proposed accelerated pipe replacement approach must balance the need to replace leak-prone, high-risk pipe segments while minimizing stranded assets.³¹⁸ According to WGL, “[a]ny risk of stranded assets is not immediate, and there is no operating data (*i.e.*, evidence) presented in this case to conclude that the Company faces an immediate risk from stranded assets that must be considered at this time.”³¹⁹ To address concerns about stranded assets and support customer electrification, the Company proposes a Customer Choice Pilot Program as one of the few viable NPAs.³²⁰ According to WGL, the pilot program is designed to provide the Commission with actual evidence of WGL customers’ interest in electrification for future consideration in the next iteration of the accelerated replacement program.³²¹ Under this three-year pilot program, WGL will create a notification and opt-out process for customers whose vintage facilities are scheduled for replacement, allowing them to discontinue service with WGL.³²²

94. WGL states that the notification and opt-out process has five steps. First, through the District SAFE Plan, WGL will identify the location of the service lines that it plans to replace

³¹⁶ SC Brief at 16. *See* SC (C) at 27:3-6 (Gas Technical Panel Direct Testimony).

³¹⁷ SC Brief at 17.

³¹⁸ Order No. 22003, ¶ 48.

³¹⁹ WGL Brief at 111, *citing* WG (2A) at 44:13-15 (Whitacre Rebuttal Testimony); WG (G) at 18:21-19:4 (Fang Rebuttal Testimony) (concluding that there is no evidence of record showing that the District is at an increased risk of stranded assets, and that District SAFE is appropriately designed to ensure continued service to customers).

³²⁰ WGL Brief at 70, *citing* WG (A) at 8:25-10:2 (Whitacre Direct Testimony); Exhibit WG (A)-1 at 37-39 (Whitacre Direct Testimony). *See also* WGL’s Brief at 116-117 (Customer Choice Program is one of the only viable NPAs). In the rebuttal testimony of WGL Witness Fang, the Company defines stranded assets as assets which, at some time before the end of their service life, are no longer utilized at the level originally foreseen to provide regulated service; *see* WG (G) at 7:18-20 (Fang Rebuttal Testimony). The witness then describes stranded costs as those incurred when an asset is retired before the end of its useful life, resulting in undepreciated costs associated with that asset. *See* WG (G) at 7:19-1-3 (Fang Rebuttal Testimony).

³²¹ WG (2A) at 38:10-14 (Whitacre Direct Testimony), The Pilot Program is supposed to provide the Commission and the parties with better data regarding customer behavior, and to address the concerns regarding potential customer migration and stranded assets.

³²² WGL Brief at 70, *citing* WG (A) at 9:1-3 (Whitacre Direct Testimony). *See also* Exhibit WG (A)-1 at 37 (Whitacre Direct Testimony).

in Years one (1) and two (2) of the program, within sixty (60) days of the issuance of an Order.³²³ Second, starting with the service lines planned for replacement in Year 2 of District SAFE, WGL will notify impacted customers within ninety (90) days of the Commission's Order that their service line has been identified for replacement in Year 2.³²⁴ Third, after receiving this Notice, customers will have until the end of Year 1 to "opt out" of natural gas service by: "(1) affirm[ing] that they are the owner of the property; (2) indicat[ing] that they have converted their home to an alternative fuel source; and (3) terminat[ing] their Washington Gas service."³²⁵ The plan provides that when the customer meets these requirements, their service will be abandoned.³²⁶ Similarly, WGL plans to abandon vintage service lines on premises where the service lines have no use and no customer of record for 24 consecutive months or more, and are on an annual project list.³²⁷ Fourth, going forward, service line replacement locations will be identified 12 months in advance, and customers will be provided approximately 11 months to convert and complete the opt-out requirements in the third step.³²⁸ Lastly, any customers who do not specifically opt out of service and have not terminated their account will have their service line scheduled for replacement, and ultimately replaced in the specified plan year.³²⁹

95. WGL believes that this pilot program balances the need to perform critical safety work with the directives in Order No. 22003 and provides customers with the option to maintain natural gas service or obtain an alternative fuel source.³³⁰ According to WGL, the program provides advance notice to give customers sufficient time to explore available assistance opportunities for converting to alternate fuel sources and to complete necessary work, while allowing the Company to seek and obtain necessary permits, crews, and certainty on the scope of work to be accomplished during a program year.³³¹

³²³ WGL Brief at 70, *citing* WG (A) at 9:9-11 (Whitacre Direct Testimony). WGL notes that, to give customers advanced notice, the Company will select projects farther out from the construction start time than it would otherwise, making them staler and less responsive to newly incorporated data or field observations. Although this does not reflect best practice for removing the most risk-prioritized pipe in the project year, the Pilot addresses the Commission's concerns about balancing safety and stranded assets. *See* Exhibit (A)-1 at 38-39 (Whitacre Direct Testimony).

³²⁴ WGL Brief at 70, *citing* WG (A) at 9:12-14 (Whitacre Direct Testimony). The Company also proposed that the cost of this notification, via certified mail, would be recovered through the APRP Adjustment mechanism. *Id.*

³²⁵ WGL Brief at 70-71, *citing* WG (A) at 9:16-18 (Whitacre Direct Testimony).

³²⁶ WGL Brief at 71, *citing* WG (A) at 9:18 (Whitacre Direct Testimony).

³²⁷ WGL Brief at 71, *citing* WG (A) at 9:19-21 (Whitacre Direct Testimony). At this point, the Company may seek to supplement the annual project list with additional risk-prioritized work.

³²⁸ WGL Brief at 71, *citing* WG (A) at 9:22-24 (Whitacre Direct Testimony).

³²⁹ WGL Brief at 71, *citing* WG (A) at 10:1-2 (Whitacre Direct Testimony).

³³⁰ WGL Brief at 71, *citing* WG (A) at 10:7-11:3 (Whitacre Direct Testimony).

³³¹ WGL Brief at 71-72, *citing* WG (A) at 10:10-20 (Whitacre Direct Testimony).

96. The Company understands that the Commission and the parties are concerned that the District's climate policies favoring electrification over natural gas are reducing the use of assets/infrastructure needed to provide essential service to District customers.³³² The concern is that if the decline in usage reaches a certain level, it could pose a risk of retiring assets before the end of their useful life, resulting in under-depreciated costs or stranded assets.³³³ WGL does not believe that a balance can be achieved if the District SAFE Plan is rejected “based upon the other parties’ unsupported concerns regarding a risk of stranded assets, where that risk is premised upon the District electrifying at a rate never before experienced in the United States.”³³⁴

97. WGL states that to address the question of how to minimize the risks of stranded costs, the Commission should initiate a proceeding similar to those in other jurisdictions, beginning with: (1) updating long-term planning for both electric and natural gas to reflect the current energy policies of the District (*Formal Case No. 1167* is underway); and (2) conducting an examination of integrated energy planning involving coordination with electric and gas planning.³³⁵ The Company states that the District should also examine available regulatory mechanisms and potential changes to the existing regulatory framework.³³⁶ The framework should include “defining and quantifying possible stranded assets, addressing the timing of cost recovery and possible intergenerational equities, and addressing the question of who pays (e.g., assignment of costs based on cost causation or on an expanded basis to all who benefit).”³³⁷ WGL argues that these considerations are complex because they involve safety and reliability, financial considerations including cost recovery, and regulatory concerns that increase when dealing with a gas-only utility.³³⁸

98. WGL Witness Wemple asserts that without the District SAFE Plan, WGL will not be able to achieve the critical balance between reducing future leaks and GHG emissions and the risk of stranded assets. The Company believes the DCG and Sierra Club witnesses’ concerns on this point are unsupported, where the assertions regarding stranded assets are premised upon the District’s electrification at a rate never before experienced in the United States.³³⁹ According to WGL, the parties’ projections vastly overstate the rate at which customers may abandon natural

³³² WG (G) at 8:7-10 (Fang Rebuttal Testimony).

³³³ WG (G) at 8:10-13 (Fang Rebuttal Testimony).

³³⁴ WGL Brief at 113, *citing* WG (G) at 9:9-12 (Fang Rebuttal Testimony). *See also* (2H) at 8:7-13 (Wemple Rebuttal Testimony). Wemple mocks DCG’s witness Hopkins for suggesting that by 2047 there would be no remaining users on the District’s gas distribution system as a result of a pace of conversion never seen before, even on a short-term basis or sustained over decades.

³³⁵ WGL Brief at 113, *citing* WG (G) at 11:16-29 (Fang Rebuttal Testimony).

³³⁶ WGL Brief at 113-114, *citing* WG (G) at 12:2-3 (Fang Rebuttal Testimony).

³³⁷ WGL Brief at 114, *citing* WG (G) at 12:4-14 (Fang Rebuttal Testimony).

³³⁸ WGL Brief at 114, *citing* WG (G) at 13:18-20 (Fang Rebuttal Testimony).

³³⁹ WG (G) at 9:8-12 (Fang Rebuttal Testimony).

gas service in favor of exclusive electricity use.³⁴⁰ As an example of conversion costs, WGL determined that replacing gas furnaces with heat pumps costs approximately \$18,500 per residential customer. This cost does not address other appliances or full conversion weatherization expenses.³⁴¹

99. With respect to electrification, WGL indicates that the Company has engaged in stakeholder meetings to discuss electrification and coordination with the District Government, but with little progress. WGL states that important questions remain unresolved, including the Company's role in the electrification process, the cost implications for customers, and how those costs would be managed through the Commission's ratemaking process. The Company emphasizes that "further extensive discussion with stakeholders is needed" to move beyond preliminary talks and achieve meaningful coordination.³⁴² The Company reiterates that it is working towards the District's goal of becoming carbon-neutral and climate-resilient in government operations by 2040, but notes that electrification is not synonymous with carbon neutrality.³⁴³

100. WGL refutes DCG's argument that District law requires electrification.³⁴⁴ DCG has based its entire policy preference on the premise that electrification will be fast, easy, and affordable and that customers will voluntarily agree to it, which it argues is not the reality.³⁴⁵ Neither party presents evidence that full conversion to electrification will be feasible or cost-effectively before 2045.

101. OPC opposes WGL's proposed Customer Choice Pilot Program because its cost provides no benefit to ratepayers and does nothing to advance the District's energy transition.³⁴⁶ OPC is concerned that WGL will not have sufficient data because it is only providing a small portion of customers the ability to opt-out through the Customer Choice Pilot Program, the estimated 3,608 customers (who convert or plan to convert) to an alternative fuel source from 2025 to 2027.³⁴⁷ These 3,608 customers are less than 0.5 percent of the approximately 1.1 million WGL customers in the D.C. service area, and WGL purportedly performs service replacements under PHMSA's Gas Distribution Integrity Management Program. Therefore, OPC argues that narrowing an opt-out program to a minuscule section of the Company's customer base will not provide

³⁴⁰ WGL Brief at 126. *See also* WG (H) at 166-11 (Wemple Rebuttal Testimony).

³⁴¹ WGL Brief at 107, *citing* WG (H) at 34:6-10.

³⁴² WG (A) at 11:20-12:1-6 (Whitacre Direct Testimony).

³⁴³ Exhibit WG (A)-1 at 31 (Whitacre Direct Testimony).

³⁴⁴ WG (2A) at 23:15 (Whitacre Rebuttal Testimony).

³⁴⁵ WG (2A) at 23:17-24:3 (Whitacre Rebuttal Testimony).

³⁴⁶ OPC Brief at 21.

³⁴⁷ OPC Brief at 21.

appropriate data for planning that minimizes the Company's stranded assets, notwithstanding that WGL is obligated to maintain a safe and reliable system regardless of surcharge recovery.³⁴⁸

102. DCG argues that WGL's only response to the problem of stranded assets is the Customer Choice Pilot Program that WGL has proposed.³⁴⁹ DCG maintains that this program, even if well-designed, would only mitigate a small fraction of potential stranded assets.³⁵⁰ DCG avers that, compared to NPAs in other jurisdictions, the Customer Choice Pilot Program lacks several key elements: adequate advance notice, a participant incentive, comprehensive outreach, and coordination with electrification programs.³⁵¹ DCG recommends that the District SAFE Plan not be approved pending steps to coordinate pipe replacement activities with electrification and the initiation of a long-term thermal planning docket, while requiring the Company to move forward with investments needed to maintain the safety of the system and continue replacing hazardous leaks.³⁵² DCG supports WGL taking a first step in the right direction and encourages the Commission to build upon this effort by directing WGL to create a more robust NPA framework.³⁵³

103. However, DCG argues that by ignoring the risks of stranded assets and failing to incorporate strategic electrification, the District SAFE Plan not only defies the Commission's directives, it also promotes a risk reduction strategy that is not financially or competitively sustainable.³⁵⁴ DCG is concerned that continuing to proceed with the Plan is "business as usual" and would increase the risk of stranded costs.³⁵⁵ According to DCG, WGL does not configure its JANA model to consider NPAs. DCG contends that, for abandonment purposes, there is no associated NPA, and the basis for receiving accelerated cost recovery for abandoning pipes is highly questionable.³⁵⁶

104. Regarding electrification, DCG claims that WGL is not proposing actions that would support electrification.³⁵⁷ WGL has not proposed undertaking any data sharing or coordinated planning to assist with electrification, nor has it proposed any incentives for

³⁴⁸ OPC Brief at 21.

³⁴⁹ DCG (A) at 9:4-6 (Hopkins Direct Testimony).

³⁵⁰ DCG (A) at 9:17-21 (Hopkins Direct Testimony).

³⁵¹ DCG Brief at 12. *See* DCG (B) at 20:3-22 (Botwinick Direct Testimony). *See also* Rocky Mountain Institute, "Service Line NPAs: Unlocking Savings and Driving Electrification", published Nov. 7, 2025.

³⁵² DCG (B) at 3:19-4:3 (Botwinick Direct Testimony).

³⁵³ DCG (B) at 21:13-16 (Botwinick Direct Testimony).

³⁵⁴ DCG Brief at 13.

³⁵⁵ DCG Brief at 19.

³⁵⁶ DCG Brief at 21.

³⁵⁷ DCG (A) at 10:7-8 (Hopkins Direct Testimony).

electrification.³⁵⁸ DCG argues that if the Commission approves the District SAFE Plan, it will forego three valuable years of potential progress in integrating strategic electrification into the gas system.³⁵⁹ DCG argues that if implemented, the Plan would be a costly obstruction to the District's climate policies.³⁶⁰

105. DCG claims that the District has enacted several laws and that the Mayor has enacted several plans and programs to accelerate electrification.³⁶¹ Under the Building Energy Performance Standards, which set energy performance targets for certain existing building types, electrification is expected to be the primary pathway for reducing energy and emissions.³⁶² According to DCG, the D.C. Council has further accelerated the trend towards electrification by passing laws like the Healthy Homes and Residential Electrification Act of 2024, which created the Breathe Easy Program to provide electrification retrofits to 30,000 low- and moderate-income households.³⁶³ DCG also mentions Executive Order 14057, which prescribes a net-zero emissions building portfolio by 2045 and relies on electrification upgrades.³⁶⁴ The Commission has acknowledged and adopted the climate and electrification goals of the District and reemphasized this fact in its Order rejecting PROJECTpipes.³⁶⁵

106. DCG has analyzed alternatives to WGL's approach, which focuses on retiring mains through clustered or neighborhood electrification.³⁶⁶ The managed approach uses policies and programs to target and cluster electrification, enabling the retirement of mains.³⁶⁷ This alternative approach, which focuses on retirement and electrification, acknowledges that the future will look different from the past, a point DCG argues WGL avoids by focusing on the past.³⁶⁸ DCG argues that electrification with decommissioning or retirement is the superior approach for climate issues and for saving ratepayers' money.³⁶⁹ DCG states that WGL's proposal addressing the Commission's electrification directive is the Consumer Choice Pilot Program, on which WGL

³⁵⁸ DCG (A) at 10:8-12 (Hopkins Direct Testimony).

³⁵⁹ DCG (B) at 12:21-24 (Botwinick Direct Testimony).

³⁶⁰ DCG Brief at 11, *citing* DCG (B) at 9-13 (Botwinick Direct Testimony).

³⁶¹ DCG Brief at 11. *See* DCG (B) at 7:14-16 (Botwinick Direct Testimony).

³⁶² DCG (A) at 25:18-19 (Hopkins Direct Testimony); DCG (B) at 6:13-19 (Botwinick Direct Testimony).

³⁶³ DCG (A) at 25:19-26:2 (Hopkins Direct Testimony); DCG (B) at 5:3-6 (Botwinick Direct Testimony).

³⁶⁴ DCG (A) at 26:3-9 (Hopkins Direct Testimony).

³⁶⁵ DCG (B) at 8:23-9:3 (Botwinick Direct Testimony).

³⁶⁶ DCG (A) at 35:10-20 (Hopkins Direct Testimony).

³⁶⁷ DCG (A) at 35:20-23 (Hopkins Direct Testimony).

³⁶⁸ DCG (A) at 43:22-24 (Hopkins Direct Testimony).

³⁶⁹ DCG (B) at 12:20-21 (Botwinick Direct Testimony).

claims it will collaborate with stakeholders and the District government.³⁷⁰ DCG argues that previous collaborative discussions at WGL stakeholder meetings did not result in better coordination between gas planning and electrification programs, as evidenced by only vague references to working collaboratively with interested stakeholders and the District government, with no mention of how or when this collaboration would occur.³⁷¹ DCG argues that WGL will not take electrification and the District's carbon neutrality goals seriously without more formal oversight and direction from the Commission.³⁷² DCG asserts that there is a need for a long-term thermal planning proceeding.³⁷³

107. Sierra Club argues that it has provided evidence of the interplay among gas system operations, emission reductions, and electrification.³⁷⁴ According to the Sierra Club it "provided concrete analysis showing that meeting the goals of safety and reliability and climate safety are not mutually exclusive, and could instead all be achieved through managed electrification, coupled with system repairs and retirements."³⁷⁵ Sierra Club offers three different "scenarios" for the District's electrification and transition away from gas: (1) Unmanaged Business-as-usual Electrification; (2) Unmanaged Full Electrification; and (3) Managed Electrification. Unmanaged Business as Usual is what Sierra Club states WGL proposes: the current rate of electrification continues at 0.5% each year, and non-electrifying homes replace gas appliances with new gas appliances.³⁷⁶ The Unmanaged Full Electrification scenario assumes that all homes electrify when their gas appliances reach their respective lifespans, with all homes electrified by 2050.³⁷⁷ Finally, a Managed Electrification scenario has all homes electrify appliances either at the end of their lives or when a gas pipe is decommissioned.³⁷⁸

108. Sierra Club avers that Unmanaged Electrification is extremely costly, approximately three times the total cost of managed scenarios, due to incurring both the costs of pipe replacement and building electrification.³⁷⁹ A managed transition, Sierra Club states, coordinates building electrification with pipe decommissioning and better aligns customer energy needs with the District's climate goals, while reducing costs.³⁸⁰ Sierra Club maintains that

³⁷⁰ DCG (A) at 10:15-19 (Hopkins Direct Testimony).

³⁷¹ DCG (B) at 14:15-15:2 (Botwinick Direct Testimony).

³⁷² DCG (B) at 17:22-18:2 (Botwinick Direct Testimony).

³⁷³ DCG Brief at 32.

³⁷⁴ SC Brief at 18.

³⁷⁵ SC Brief at 18.

³⁷⁶ SC (A) at 11:16-17 (Pierce Direct Testimony); SC (B) at 12:11-13:1 (Lyman Direct Testimony).

³⁷⁷ SC (B) at 12:11-13:1 (Lyman Direct Testimony).

³⁷⁸ SC (B) at 12:11-13:1 (Lyman Direct Testimony).

³⁷⁹ SC (B) at 5:20-22, 8:13-14, and 17:1-13 (Lyman Direct Testimony).

³⁸⁰ SC (B) at 7:3-9 (Lyman Direct Testimony).

electrification, particularly Managed Electrification, is the most viable alternative to gas pipe replacement, noting that customers realize average annual household savings of \$775 to \$1284.³⁸¹ In addition, the Sierra Club states that electrification is growing in market share as it becomes more financially attractive, with gas-heated homes falling from 64% to 50% and electrically-heated homes rising from 30% to 45% between 2010 and 2022.³⁸² Sierra Club concludes that pipe replacement is not a prudent solution to reducing customer costs and achieving climate goals, and that investments in building electrification combined with pipe decommissioning will bring lower building-sector emissions at a lower cost.³⁸³

VI. DECISION

A. Standard of Review

109. In reviewing an application for accelerated pipeline replacement, the Commission is “entrusted with the primary responsibility of arriving at a fair balance between competing consumer and investor interests . . .”³⁸⁴ Our role as regulators in this case is to ensure that essential natural gas service is available, safe, reliable, provided to all who require it and that the services will be priced at a reasonable level. The Commission is also required to consider in its deliberations, are set forth in D.C. Code § 34-808.02, which requires the Commission to “consider the public safety, the economy of the District, the conservation of natural resources, and the preservation of environmental quality, including effects on global climate change and the District’s public climate commitments.”³⁸⁵ Based on these overarching principles, we address WGL’s District SAFE Plan.

110. In this proceeding the utility, as the proponent of the application, has the ultimate burden of proof to demonstrate that its proposed program/plan is just, reasonable, and in the public interest.³⁸⁶ Included in that burden “is a responsibility to develop a record sufficiently complete to support a Commission order in their favor on any contested issue.”³⁸⁷ Additionally, “there must be

³⁸¹ SC (B) at 19:10-20:2 (Lyman Direct Testimony).

³⁸² SC (B) at 4:18-5:2 (Lyman Direct Testimony).

³⁸³ SC (B) at 28:5-14 (Lyman Direct Testimony).

³⁸⁴ *Office of the People’s Counsel v. Pub. Serv. Comm’n*, 399 A.2d 43, 45 (D.C. 1979).

³⁸⁵ D.C. Code § 34-808.02.

³⁸⁶ See D.C. Code § 2-509(b) (“[T]he the proponent of a rule or order shall have the burden of proof.”); see also *Washington Pub. Interest Org. v. Pub. Serv. Comm’n*, 393 A.2d 71, 77 (D.C. 1978) (“Included in that burden is a responsibility to develop a record sufficiently complete to support a Commission order in [WGL’s] favor on any contested issue.”), supplemental opinion and dissent, 404 A.2d 541 (D.C. 1979), cert. denied, sub nom *Potomac Elec. Power Co. v. Pub. Serv. Comm’n*, 444 U.S. 926 (1979); *Formal Case No. 912*, In the Matter of the Application of Potomac Electric Power Company for an Increase in Retail Rates for the Sale of Electric Energy, Order No. 10044, at 53, rel. June 26, 1992 (“When any party or Staff proposes that the Commission change its policy, they have a substantial burden of proof to overcome.”).

³⁸⁷ *Washington Pub. Interest Org. v. Pub. Serv. Comm’n*, 393 A.2d at 77.

enough evidence, rationally related to the order (through clearly articulated criteria), to justify the Commission's decision."³⁸⁸

111. If another party challenges an issue or information presented by the utility, that party must provide sufficient evidence or argument to create a "serious doubt" on the issue.³⁸⁹ Further,

"where some other participant in the proceeding creates a serious doubt as to the prudence of an expenditure, then the applicant has the burden of dispelling these doubts and proving the questioned expenditure to have been prudent."³⁹⁰

Thus, the burden of proof remains on the utility.

B. Witness Testimony

112. WGL raised a legal challenge to the parties' witnesses (Fitzhenry, Hopkins, Botwinick, Pierce, and Lyam), arguing that they lack the requisite expertise, knowledge, and training to credibly opine upon the efficacy of a natural gas pipeline replacement program.³⁹¹ The Commission recognizes that Federal Rules of Evidence ("FRE") Rule 702 sets the standard for admissibility of opinion, scientific, technical, or specialized knowledge testimony. FRE 702, provides that:

A witness who is qualified as an expert by knowledge, skill, experience, training or education may testify in the form of an opinion or otherwise if:

- a. the expert's scientific, technical, or other specialized knowledge will help the trier of fact to understand the evidence or to determine a fact in issue;
- b. the testimony is based on sufficient facts or data;
- c. the testimony is the product of reliable principles and methods; and
- d. the expert has reliably applied the principles and methods to the facts of the case.

113. In this instance, the Commission finds that the parties' witnesses possess sufficient specialized knowledge, skill, experience, or training to provide testimony on climate matters, GHG

³⁸⁸ *Washington Pub. Interest Org. v. Pub. Serv. Comm'n*, 393 A.2d at 77.

³⁸⁹ *Potomac Electric Power Company v. Pub. Serv. Comm'n*, 661 A.2d 131, 140 (D.C. 1995).

³⁹⁰ *Potomac Electric Power Company v. Pub. Serv. Comm'n*, 661 A.2d at 140.

³⁹¹ WGL Brief at 78-83.

emissions reduction, alternative techniques and non-pipe alternatives, and budgeting and cost recovery, some of which are elements used in the development of the District SAFE Plan. The Commission believes that the testimony is relevant and admissible and will help the Commission understand the evidence and assist in our determinations in this matter.³⁹² We believe that reviewing all the testimony and evidence will provide the Commission with the best opportunity to make an informed, balanced decision that ensures safe and reliable natural gas service is available in the District and protects the public interest.

C. Compliance With Order No. 22003

114. The Commission has reviewed and evaluated the evidentiary record and finds, for the reasons noted herein, that WGL's District SAFE Plan complies with Order No. 22003. Throughout the discovery process, WGL provided updated information as directed by the Commission. In addition to reviewing the information submitted by the parties, the Commission conducted its own independent review to assess WGL's application complied with the Commission's directives. In doing so, we have maintained the same categorization for the review as follows: (a) Timeline and Parameters; (b) Historical and Current Data; (c) Scope and Feasibility; (d) Cost Recovery and Budget Assumptions; (e) Explanation of Approach and Methodology; (f) Results of Studies and Analysis; and (g) Commission Directives based on the Continuum Audit. Below, the Order discusses the categories designated by the Commission as the Plan requirements.

i. Timeline and Parameters

115. In reviewing WGL's District SAFE Plan, we note that the Company has proposed a three-year timeline for the District SAFE Plan. The Commission finds that the three-year timeline meets the parameters set forth in Order No. 22003 ¶ 49.³⁹³

ii. Historical and Current Data

116. The Commission has evaluated the Historical and Current Data and determined that the informational items are complete. The Commission finds that the requirements of Order No. 22003 ¶¶ 51(a) through (e) have been met, as the District SAFE Plan has identified the number of miles of main and services, the remaining miles of main and services to be replaced, and the current estimated leak rates for PROJECTpipes eligible materials. Although the parties may continue to have questions concerning the qualitative explanations and the validation of WGL's methodology, the Commission finds that the Company has met the requirements.

³⁹² See *Motorola v. Murray*, 147 A.3d 751,755 (D.C. 2016), quoting *Kumho Tire v. Carmichael*, 526 U.S. 137, 141 (1999) (when making admissibility determinations, the Court's gatekeeping requirement applies equally to "testimony based on 'technical' and 'other specialized' knowledge").

³⁹³ Order No. 22003 at ¶ 49: "The Commission expects WGL's new Application to reflect a focused approach, demonstrating the critical balance between reductions in future leaks and GHG emissions against the risk of stranded assets as the District continues its energy transition."

iii. Scope and Feasibility

117. The Commission next evaluated the Scope and Feasibility of the District SAFE Plan, which required WGL to identify specific replacement activities, their justifications, and WGL's ability to achieve these plans including both near-term (2025-2027) activities and longer-term projections for the District SAFE Plan. The requirements of Order No. 22003 ¶¶ 51 (f) (g) (m) and (n) were to identify program completion dates, material types, and the number of planned replacements to be replaced for the three-year period, the number of mains and services to be decommissioned each year (without the need for replacement), and differentiation of normal and accelerated replacements, respectively.

118. After reviewing the testimony, exhibits, and the arguments presented, the Commission is persuaded that WGL has provided the information required for the Scope and Feasibility of the District SAFE Plan. Because the District SAFE Plan is a single, overarching program rather than multiple programs divided by material categories as utilized in PROJECT*pipes*, the Company will identify and prioritize projects based on the RRPD metric using the JANA risk model.³⁹⁴ The Commission agrees with the Company that the Plan should focus on immediate safety needs rather than pursuing a speculative long-term strategy, because any long-term strategy should be addressed in *Formal Case No. 1167*.³⁹⁵ In addition, we are convinced by WGL's arguments that there should be no predetermined targets, as project selection will be based on JANA's risk model's assessment of the risk-reduction potential. Also, the Commission notes that WGL provided a differentiation of "normal" versus "accelerated pipe replacement" as required by Order No. 22003. The Commission recognizes, as DCG noted, 15 miles of cast-iron mains for potential abandonment were identified by WGL, but the Company has not provided specifics for decommissioning the mains. Therefore, we are directing WGL to provide an update including detailed information regarding the proposed abandonment projects within thirty (30) days of the date of this Order.

iv. Cost Recovery and Budget Assumptions

119. In Order No. 22003, the Company was required to provide the basis for their proposed annual budgets and the need for a surcharge recovery mechanism. WGL proposed a \$215 million budget for the three-year period of the District SAFE Plan (\$50 million in 2025, \$75 million in 2026, and \$90 million in 2027). WGL argues that this reflects their proven ability to operate effectively during PROJECT*pipes*³⁹⁶ and would allow them to further accelerate replacements to stay ahead of the aging system and reduce emissions ahead of the District's 2045 target.³⁹⁷ The Company contends that without accelerated recovery, the significant regulatory lag

³⁹⁴ WG (C) 14:4-11 (Jacas Direct Testimony).

³⁹⁵ See Order No. 22003, ¶ 49 (the Commission directed WGL to file an application that reflected a focused approach, demonstrating a balance between reductions in future leaks and GHG emissions against the risk of stranded assets).

³⁹⁶ Exhibit WG (A)-1 at 30 (Whitacre Direct Testimony).

³⁹⁷ Exhibit WG (A)-1 at 39-41 (Whitacre Direct Testimony).

and large required Capital Expenditures would prevent them from earning a fair rate of return and exacerbate their under earning in the District.³⁹⁸ The Commission notes that WGL's proposed budgets are built upon unit cost estimates and projected miles of replacement, reflecting a risk-driven program designed to address the highest-risk pipe segments rather than a commitment to replace a predetermined number of miles of main. The approved budget for the Modified District SAFE Plan is addressed in Section VI.F of this Order. Based on the Commission's review, we find that the Company has provided the information as required by Order No. 22003 ¶¶ 51 (h) and (o).

v. Explanation of Approach and Methodology (JANA Risk Model, Risk Prioritization, and Project Selection)

120. Order No. 22003 directed WGL to “[e]xplain how JANA Lighthouse...includ[ing] details on how JANA produces risk scores and risk rankings.”³⁹⁹ Several parties took issue with an apparent lack of transparency surrounding JANA itself and its inner workings.⁴⁰⁰ While these criticisms may have been valid at the start of this proceeding, we believe the numerous additional Data Request Responses, testimony, and other supplemental filings submitted over the course of the litigation have addressed these concerns and provided adequate transparency for regulatory oversight. The Commission has analyzed the JANA risk scoring data provided by WGL,⁴⁰¹ and compared deciles of material composition, segment count, and mileage distribution. Our analysis showed a significant concentration of risk in specific and targeted materials, with the highest risk decile of mains (309.56 miles) consisting of 96.29% cast iron, 1.94% unprotected steel and 1.77% other materials. Furthermore, over 75% of the entire cast iron mileage was contained within this highest-risk decile, while plastic mains concentrated in lower-risk sections of the data. In addition, our analysis demonstrated that the highest risk decile contained double the mileage of main segments than the oldest age decile of data, meaning JANA was able to identify double the urgent, high-risk material than a solely material and age-based system.⁴⁰² Based on our review of the discovery materials and analysis of the data mentioned above, we conclude that the JANA risk model produces meaningful risk scores that the Company can rely and act on. Additionally, with WGL's persuasive arguments regarding PHMSA regulations and best practice, the lack of a proposed alternative to JANA to replace the now-obsolete Optimain, and the fact that JANA has been utilized in Commission-approved project lists in the past,⁴⁰³ the Commission approves both

³⁹⁸ WG (F) 4:12-23 (Lawson Direct Testimony); WG (2F) 3:17-21 (LawsonRebuttal Testimony); WG (2F) 5:1-10 (Lawson Rebuttal Testimony).

³⁹⁹ Order No. 22003, at ¶ 51(k).

⁴⁰⁰ DCG (A) at 14:11-13 (Hopkins Direct Testimony); SC (C) at 23:14-20 (Gas Technical Panel Direct Testimony); and Brief Transcript at 260:5-19. *See also* DCG Brief at 14.

⁴⁰¹ *See Formal Case No. 1179*, WGL's Response to OPC Data Request No. 8-3, filed October 6, 2025.

⁴⁰² 309.56 miles versus 152.51 miles of main segments were identified. Both categories (oldest mains and highest-risk mains) were extremely cast-iron dominated.

⁴⁰³ *Formal Case No. 1154*, Order No. 22697 at ¶ 24, rel. August 5, 2025.

JANA and WGL's proposed risk prioritization and project selection methodology for use in the District SAFE Plan.

121. Order No. 22003 directed that WGL's proposal, which would later become District SAFE, "should be narrowly focused on the aging highest-risk pipe segments that are highly susceptible to leaks..."⁴⁰⁴ Several parties have doubted that the District SAFE Plan's focus is sufficiently narrow⁴⁰⁵, even recommending that material and age requirements be hard-wired into the project selection criterion.⁴⁰⁶ The Commission reviewed data provided by the Company explaining JANA's risk model targeting high-risk and leak-prone materials and considered the parties' testimony and arguments, and concludes that JANA's risk model both evaluates and identifies materials with the appropriate risk as directed by the Commission in Order No. 22003 ¶ 51(k).

vi. Results of Studies and Analysis

122. WGL was required to provide updates to two ongoing studies relevant to pipe replacement. Specifically, Order No. 22003 ¶¶ 51 (q) and (r) directed the Company to provide updates on the internal versus external crew usage assessment and the Industry Peer Review study. WGL asserts that it will conduct a formal assessment of internal versus external crew use and submit it within 18 months of the District SAFE Plan approval.⁴⁰⁷ Regarding the Industry Peer Review that was scheduled, the Company asserts that the study has not yet been completed.⁴⁰⁸

123. The Commission recognizes that the assessment and peer review were requested as part of the Continuum Audit directives, which presumed that the new pipe replacement plan would be a structurally similar overarching program for pipe replacement. While the District SAFE Plan is fundamentally different from *PROJECTpipes*, we find that an evaluation of the internal versus external crew usage assessment and the Industry Peer Review study are necessary to evaluate the Company's performance. Because of the significant changes to the pipe replacement program, the Commission finds that WGL's request to submit the formal assessment for internal versus external crew use within 18 months from the date of this Order is reasonable and directs the Company to file the assessment no later than December 31, 2027. The Commission also directs WGL to complete its participation and submit the Industry Peer Review study's results no later than June 30, 2029.

⁴⁰⁴ Order No. 22003, at ¶ 49.

⁴⁰⁵ OPC Brief at 22-23; DCG Brief at 13; OPC (A) at 13:8-11 (Fitzhenry Direct Testimony); and SC (C) at 24:2-6 (Gas Technical Panel Direct Testimony).

⁴⁰⁶ DCG brief at 13-14.

⁴⁰⁷ Exhibit WG (C)-1 at 16 (Jacas Direct Testimony).

⁴⁰⁸ Exhibit WG (C)-1 at 17-18 (Jacas Direct Testimony).

vii. Commission Directives based on the Continuum Audit

124. After careful review, the Commission continues to find that the approved Audit recommendations in Order Nos. 22003 and 22367, which address how activities are to be implemented through District SAFE, are more appropriately evaluated under the Company's Program Implementation Plan ("PIP"). Therefore, the Commission directs the Company to file its PIP by December 31, 2026, as described herein, reflecting the recommendations from the Continuum Audit as outlined in Order No. 22003.

viii. Advanced Leak Detection("ALD")

125. WGL was required to explain how, if at all, ALD is incorporated into proposed project selection. The Company explained how ALD is a tool for leak survey and repair rather than risk modeling and that it is best utilized as part of a comprehensive leak survey, repair and documentation system that incorporates multiple elements. The Commission is convinced that ALD is not sufficient on its own for leak management and project selection.⁴⁰⁹ Therefore, the Commission finds this summary submitted in WGL's District SAFE Plan complies with Order No. 22003 ¶ 51(i).

ix. Tracking Greenhouse Gas("GHG") Emissions Reductions

126. WGL was required to provide a method for tracking estimated leak reductions and GHG emissions reductions that considered the actual condition, previous leaks, and material type of the pipes actually replaced. In Order No. 22367, the Commission decided not to require WGL to provide further surrebuttal testimony to comply with the directives in Order No. 22003 ¶ 51(j), in addition to ¶¶ 51 (h), (n), (o), (q), and (r). The Commission recognizes the difficulties identified by the Company in providing specific GHG emissions reduction calculations utilizing criteria beyond established industry and Environmental Protection Agency guidelines. We find that the Company's submitted GHG emission estimations comply with Order No. 22003 ¶ 51(j).

x. Electrification Coordination

127. WGL was required to explain how the restructured targeted replacement program would account for any electrification programs within the District. Specifically, the Commission stated that this explanation should include specific plans for coordination with interested stakeholders and the D.C. Government to ensure that replaced pipes are not expected to be decommissioned within 10 years of installation. The Company states that while it has engaged in stakeholder meetings to discuss electrification and coordination with the District Government, little progress has been made. WGL also highlights that critical questions remain unresolved, including its role in the electrification process, the cost implications for customers, and how those costs would be managed through the Commission's ratemaking process. The Company emphasizes that "further extensive discussion with stakeholders is needed" to advance beyond preliminary talks and achieve meaningful coordination efforts. WGL also proposes a Customer Choice Pilot Program in its District SAFE Plan to address concerns about stranded assets and

⁴⁰⁹ WG (2E) 9:1-10:2 (Oliphant Rebuttal Testimony).

support customer electrification. The Commission finds the explanations provided by the Company regarding ongoing electrification programs and coordination efforts in WGL's District SAFE Plan comply with Order No. 22003 ¶ 51(l).

xi. Non-Pipe Alternatives (“NPAs”)

128. WGL was required to identify techniques, technologies, strategies, or other options the Company considered to reduce leak rates and the risk posed by aging, leak-prone pipes in the distribution system. The Company provided their analysis of alternative technologies such as CISBOT, pipeline liners, and other NPAs, contending that they are not appropriate permanent remediation techniques for the high-risk materials targeted for replacement in the District SAFE Plan.⁴¹⁰ The Commission finds this summary submitted in WGL's District SAFE Plan complies with Order No. 22003 ¶ 51(p).

D. Restructured Pipe Replacement Program (Modified District SAFE Plan)

129. PROJECT*pipes* and its authorized phases, PROJECT*pipes* 1 and 2, were organized into discrete material-specific subprograms with defined annual spending allocations and material targets. Accelerated pipeline replacement work authorized via the PROJECT*pipes* program phases 1 and 2 targeted cast iron mains, bare and unprotected steel mains and services, mechanically coupled steel segments, and other designated materials. Each PROJECT*pipes* phase of the program and its associated extensions operated within its own parameters and funding structure.

130. The Commission has reviewed the evidentiary record and finds that the Modified District SAFE Plan represents a structural departure from the prior-approved accelerated pipeline replacement program, PROJECT*pipes*. Specifically, we find that the Modified Plan is a strategically focused risk-driven pipe replacement program, intended to avoid cascading leaks in the future by replacing aging, leak-prone high-risk mains and services, thereby enhancing the safety and reliability of the natural gas system and reducing GHG emissions for District residents while the District continues to solidify plans for full electrification. The Modified District SAFE Plan consolidates system assets through a single risk-scoring methodology rather than relying upon specific material categories of eligible materials. As the Commission directed in Order No. 22003, project selection through the District SAFE Plan is narrowly focused on the reduction of the most immediate risk by optimizing risk reduction per dollar spent rather than wholesale replacement of material categories. Additionally, the Commission shall require a review of the Company's overall performance after two (2) years, as described, to ensure the program has been implemented effectively.

131. The Commission modifies the use of the existing APRP Surcharge mechanism for cost recovery while adding a threshold-based requirement for recovery for the Modified District SAFE Plan as explained herein, consistent with a recommendation from the Sierra Club. The Commission notes that the structural reliance on surcharge-based recovery reflects continuity with prior accelerated pipe replacement programs, while the underlying program design has shifted to a consolidated, risk-model-driven framework. This approach aligns with peer jurisdictions that

⁴¹⁰ WG (2D) at 22:9-23:2 (Stuber Rebuttal Testimony).

have reformed rather than eliminated similar pipe replacement programs designed to meet the goals of PHMSA's Call to Action.⁴¹¹

132. The Commission also recognizes that WGL proposes to retain the operational flexibility utilized during the PROJECT*pipes* program within the District SAFE Plan structure. In particular, the Company indicates that certain projects may be advanced due to operational considerations, constructability constraints, or work compelled by third parties, including DDOT paving coordination or other capital programs. While coordination of infrastructure work can reduce community disruption and duplication of effort, such flexibility must not undermine the central premise of risk-based prioritization required by Order No. 22003. Therefore, pipe replacement work authorized under the Modified District SAFE Plan shall be strictly based on quantified risk reduction per dollar spent. The Modified District SAFE Plan shall only include projects initiated through work compelled by others when they qualify via the risk-reduced-per-dollar-spent criteria, as further described below. The Commission notes that while the current implementation of the JANA risk model does not include risk from nearby construction, future iterations may incorporate additional risk factors, which will be reviewed as part of the Annual Project List submission.

133. In sum, the Commission finds that, as modified by this Order, WGL's proposed District SAFE Plan structure is characterized by: a) consolidation of previously separate material-based programs into a unified strict risk-based framework; b) annual project selection driven by JANA model risk scoring and risk-reduction-per-dollar metrics; c) a defined three-year approval cycle, rather than an overarching multi-decade authorization; d) continued reliance on accelerated surcharge recovery in combination with the threshold-based requirement; e) limited flexibility for operationally compelled or coordination-based projects; and f) robust reporting requirements enhancing transparency and accountability. Therefore, the Commission adopts the overall structure of the District SAFE Plan proposed by the Company with certain modifications and approves a restructured pipe replacement program in this Order. The elements of the Modified District SAFE Plan, as approved by the Commission, are explained below.

E. Cost Recovery Mechanism

134. The Commission carefully reviewed all parties' testimony and agrees with the Sierra Club recommendation that WGL should first recover a percentage of the program's yearly budget through base rates. The Commission notes that, regardless of the cost recovery mechanism, WGL has a statutory obligation to maintain and provide safe and effective gas service.⁴¹² This is

⁴¹¹ WG (F) at 8:4-12 (Lawson Direct Testimony); The Company notes that 41 states including New York, Massachusetts and Maryland have accelerated replacement programs with special cost recovery mechanisms, reflecting a broad regulatory consensus that traditional ratemaking is insufficient for these programs. WGL's Post Hearing Brief on page 23, citing WG (B) 6:16-7:17, explains that when PHMSA issued its Call to Action, it specifically encouraged regulators to "adopt and approve special rate mechanisms to allow for accelerated infrastructure replacement." Because ensuring timely cost recovery was "critical to the success" of accelerated pipeline replacement programs.

⁴¹² D.C. Code § 34 1101(a): "Every public utility doing business within the District of Columbia is required to furnish service and facilities reasonably safe and adequate and in all respects just and reasonable.

echoed among several parties in this case.⁴¹³ The Commission has acknowledged PHMSA's Call to Action for utilities to accelerate the replacement of high-risk infrastructure and its recommendations to those utilities' regulators to adopt special rate mechanisms that facilitate this replacement.⁴¹⁴ The fact remains that WGL's system retains a significant amount of leak-prone infrastructure, and in spite of the District's plans for energy transition, it is critically necessary to address immediate public safety hazards and mitigate risks to residents during that transition. As we have repeatedly stated, the safety and reliability of the natural gas distribution system is the Commission's paramount responsibility.

135. The Commission finds that it is necessary and reasonable to allow a surcharge recovery mechanism to address safety concerns and maintain parity with the District's peer jurisdictions.⁴¹⁵ Without a surcharge recovery mechanism, accelerated replacement activity would compete with WGL's other capital expenditure priorities, either causing delays and disincentivizing high-risk projects with higher capital costs, or forcing WGL to incur higher borrowing costs, which would be passed on to ratepayers. However, the Commission finds that it is necessary to balance the accelerated cost recovery using a combination of a surcharge recovery mechanism and normal base rate recovery for a more strategic and cost-effective plan than in the previously approved PROJECT*pipes* program.⁴¹⁶ In other words, while we generally approve the accelerated recovery surcharge mechanism into the District SAFE Plan, the Commission finds that modifications to WGL's proposed cost recovery are required.

136. The Company is expected to continue normal replacement work, which is recovered through its base rates. To address the concerns regarding normal versus accelerated replacement work, the Commission hereby adopts a threshold-based requirement for recovery mechanism as a part of the Modified District SAFE Plan approval. The Commission sets an annual "threshold" amount of \$10 million for Year 1 (22% of the Modified District SAFE Plan Year 1 budget), \$12.5 million for Year 2 (25% of the Modified District SAFE Plan Year 2 budget), and \$15 million for Year 3 (27.2% of the Modified District SAFE Plan Year 3 budget) of the Modified District SAFE Plan. This cost recovery approach also aligns with Sierra Club's recommendation of recovering the first 25% of the program year's budget cap through base rates, in general. Any pipeline replacement or similar infrastructure expenditures below the authorized annual threshold would be considered "normal" activity, and recorded in a specific District SAFE Plan Account for tracking purposes, and subject to typical base rate case recovery similar to any other capital expenditure. If the Commission-authorized threshold has been met for a given year of the authorized three-year program, in replacements exceeding that threshold, that amount would be

⁴¹³ OPC (A) at 23:12-13 (Fitzhenry Direct Testimony); DCG (A) at 5:1-4 (Hopkins Direct Testimony).

⁴¹⁴ Pipeline and Hazardous Materials Safety Administration ("PHMSA"), "Call to Action to Improve Gas Pipeline Safety" 2011.

⁴¹⁵ See e.g., Maryland's STRIDE program was significantly reformed through the 2025 Next Generation Energy Act, and Massachusetts substantially modified its Gas System Enhancement Plan ("GSEP") while maintaining its accelerated cost recovery mechanism.

⁴¹⁶ Order No. 22003 at ¶ 50. See also, Order No. 22003, fn. 125: "WGL must present a more cost-effective program in a new PIPES Application."

eligible for accelerated cost recovery through the Modified District SAFE Plan surcharge mechanism up to that year's annual budget cap. WGL shall identify which projects are included in the threshold each year during the reconciliation process as detailed below. Expenditures applied to the threshold amount will also be counted towards that program year's budget cap amount.⁴¹⁷ The Commission expects that all District SAFE Plan expenditures, surcharge eligible spending or otherwise, will be rolled into WGL's rate base during the next applicable base rate case proceeding for the Commission's consideration, and will be subject to a final prudence review.

137. Both the pipe replacement work and associated spending under the threshold and surcharge recovery mechanism authorized by the Commission shall be tracked and reported in the Annual Completed Projects filings. All expenditures, including surcharge and threshold-based cost recovery, within the modified District SAFE Plan require the Commission's prior approval of the proposed Project List. Expenditures above the authorized annual budget cap will return to the traditional base rate case recovery for the Commission's consideration and review. This threshold-based recovery method ensures that only work performed above and beyond the normal utility operation is eligible for accelerated cost recovery, while providing increased transparency into program costs and maintaining effective cost controls.

138. The Commission will allow recovery of the cost to abandon high-risk pipes only when they are directly associated with other installations on replacement projects. In other words, abandonment-only project costs shall be excluded from the annual threshold and surcharge cost recovery mechanism. This was a concern raised by many parties – including DCG.

139. The Commission directs WGL to maintain various existing cost control mechanisms within the Modified District SAFE Plan as follows:⁴¹⁸ First, in *Formal Case No. 1142*, WGL committed to not recover in the surcharge any replacement/remediation expenditures for completed program work incurred post-Merger Close that exceeds 120% of the rolling two-year annual average program cost.⁴¹⁹ The Commission adopts this requirement for the modified District SAFE program. WGL shall exclude any completed work that exceeds 120% of the rolling two-year annual average category (mains or services) from the surcharge or threshold cost recovery. Second, WGL shall provide Class 3 cost estimates for each project included in the proposed Annual Project List. Third, in its Annual Completed Projects Filing, WGL shall submit an explanation of any cost variance with the actual costs exceeding five percent above or below the initial cost estimates included in the Annual Project List submission.

⁴¹⁷ E.g., if a given year of the modified District SAFE program has a budget cap of \$50 million, the first \$12.5 million would go towards the threshold and be recovered through base ratemaking, expenditures beyond \$12.5 million and up to \$50 million would be eligible for accelerated surcharge recovery, and expenditures beyond \$50 million in that program year would return to base rate recovery.

⁴¹⁸ *Formal Case No. 1142, In the Matter of the Merger of AltaGas Ltd. And WGL Holdings, Inc.* (“*Formal Case No. 1142*”), Order No. 19396, Appendix A at 26-27, rel. June 29, 2018. Pursuant to *Formal Case No. 1142*, Merger Commitment 72 (“Merger Commitment 72”). See also Order No. 20671, at ¶ 105.

⁴¹⁹ Merger Commitment 72.

F. Program Budget

140. In consideration of affordability and reasonableness, we agree with the budget offered by OPC. WGL argues an expanded \$215 million budget is necessary for the three-year period when this iteration of the District SAFE Plan will operate (\$50 million in 2025, \$75 million in 2026, and \$90 million in 2027). The Commission has reviewed the Company’s proposed capital expenditures, the historical performance within PROJECT*pipes*, programs in peer jurisdictions, stakeholder concerns, and the impact on natural gas ratepayers. To ensure the safety and reliability of the natural gas system in the District, the Commission finds that a maximum of \$150 million over the approved three-year period (July 1, 2026, through June 30, 2029) is the appropriate spending level. This budget amount of \$150 million for the Modified District SAFE Plan represents an approximately 30% reduction from WGL’s proposed budget, reflecting the Commission’s intent to balance continued progress on high-risk replacement against ratepayer cost concerns, while maintaining a level of investment necessary to maintain the pace of replacements achieved through PROJECT*pipes* 2 and prevent the Company from falling further behind the pace of replacements in peer jurisdictions. The Commission has taken this deliberate approach, as stated in Order No. 22003, to maintain a balance between the safety and reliability of the natural gas distribution system while reducing both the risk of stranded assets and the burden to ratepayers.

141. The annual budget shall reset each year under the three-year approved program, with no rollover if previous year’s expenditures fall below the authorized dollar limit. Accordingly, the Commission adopts the following spending cap schedule:

Commission-Modified District SAFE Plan Budget Schedule	
July 1, 2026-June 30, 2027	\$45 million
July 1, 2027-June 30, 2028	\$50 million
July 1, 2028-June 30, 2029	\$55 million

G. JANA Risk Modeling and Project Selection

142. Order No. 22003 advised that WGL’s new pipeline replacement proposal “should be narrowly focused on the aging highest-risk pipe segments that are highly susceptible to leaks...”⁴²⁰ Several parties have doubted that the District SAFE Plan’s focus is sufficiently narrow,⁴²¹ even recommending that material and age requirements be hard-wired into the project selection criterion.⁴²² The Commission has analyzed the JANA risk scoring data provided by WGL,⁴²³ and organized it into deciles, comparing material composition, segment count, and

⁴²⁰ Order No. 22003, at ¶ 49.

⁴²¹ OPC Brief at 22; OPC (A) at 13:8-11 (Fitzhenry Direct Testimony); and SC (C) at 24:2-6 (Gas Technical Panel Direct Testimony).

⁴²² DCG brief at 13-14.

⁴²³ See *Formal Case No. 1179*, WGL’s Response to OPC Data Request No. 8-3, filed October 6, 2025.

mileage distribution. Our analysis showed a significant concentration of risk in specific and targeted materials, with the highest-risk decile of mains (309.56 miles) consisting of 96.29% cast iron, 1.94% unprotected steel, and 1.77% other materials. Furthermore, over 75% of the entire cast iron mileage was contained within this highest-risk decile, while plastic mains concentrated in lower-risk sections of the data. In addition, our analysis demonstrated that the highest-risk decile also contained twice the mileage of main segments than the oldest age decile of data, meaning JANA was able to identify double the urgent, high-risk material than a system based solely on material and age.⁴²⁴ The Commission is convinced that this data supports WGL's proposed risk prioritization methodology, which utilizes the JANA model, and that it targets immediate high-risk, aging, leak-prone materials to a satisfactory degree and assigns them appropriate risk. As such, the Commission feels it is unnecessary at this time to set material or age-specific quotas or criteria for Annual Project Lists to meet, but we may later revisit such requirements following further evaluation of the Company's performance. Therefore, the Commission approves a strictly risk-based project prioritization methodology for the Modified District SAFE Plan.

143. Order 22003 also directed WGL to “[e]xplain how JANA Lighthouse will aid in a project prioritization...include[ing] details on how JANA produces risk scores and risk rankings.”⁴²⁵ Several parties argued there was an apparent lack of transparency surrounding JANA itself and its inner workings.⁴²⁶ However, we believe the thorough and voluminous filings submitted on the subject over the course of this proceeding have sufficiently addressed these concerns and provided adequate transparency for regulatory oversight. Based on our detailed review of these materials and analyses of the data mentioned above, we conclude that JANA produces meaningful risk differentiation. The Commission is convinced that JANA, a probabilistic risk assessment model, is designed to identify the most leak-prone assets, quantify that risk, and capture the probabilities of loss of containment failure (a leak) and the range of potential outcomes from a loss of containment, and is consistent with PHMSA regulations and best practice.⁴²⁷ Therefore, the Commission approves the use of JANA's risk model as the basis for evaluating pipeline risk and project development within the Modified District SAFE Plan.

144. The Commission recognizes the value of ALD as a leak survey and repair tool and encourages the Company to continue to utilize it to proactively find leaks within the District. However, the Modified Plan is a proactive replacement program designed to replace pipe before it begins leaking and therefore the identification and repair of active leaks is outside the program scope. The Commission will continue to evaluate the best practices and utilization of ALD within *Formal Case No. 1178* where we are currently evaluating the Company's leak survey and pipeline repair programs.

⁴²⁴ 309.56 miles versus 152.51 miles of main segments were identified. Both categories (oldest mains and highest-risk mains) were extremely cast-iron dominated.

⁴²⁵ Order No. 22003, at ¶ 51(k).

⁴²⁶ DCG (A) at 14:11-13 (Hopkins Direct Testimony); SC (C) at 23:14-20 (Gas Technical Panel Direct Testimony); and Brief Transcript at 260:5-19. *See also* DCG Brief at 14.

⁴²⁷ WG (E) at 5:4-19 (Oliphant Direct Testimony).

H. Annual Project List Submission

145. While WGL's proposed methodologies for risk prioritization and project selection are approved as a general matter, the Commission adopts several modifications and reporting requirements to ensure that the Modified District SAFE Plan is consistent with our continued intent to maintain a balance between addressing immediate safety concerns while minimizing the risk of stranded assets in alignment with the District's climate goals.

146. First, we direct WGL to strictly adhere to its proposed risk-prioritization approach. Projects shall be prioritized and selected based upon RRPD utilizing the JANA risk scores and Class 3 cost estimates. Projects identified from other sources that do not meet the selection criteria based upon RRPD, including but not limited to: (a) work compelled by others, (b) field observation initiated projects, or (c) emergency work, shall be ineligible for inclusion in the surcharge or annual threshold recovery mechanism. The proposed Annual Project List based on the risk prioritization described in this Order shall be subject to Commission approval. The Company shall not be allowed to modify the list of projects following the Commission's approval of annual project list submission without seeking prior permission from the Commission.

147. Second, WGL shall include a complete set of the JANA model outputs used to develop the annual project list with each proposed annual project list. This data set shall include risk scores for all high-risk pipe segments in the District, whether they are selected or not.⁴²⁸ This will allow the Company to maintain transparency while meeting the burden of selecting the highest-risk leak prone projects that require immediate replacement to ensure the continued safety of the natural gas distribution system in the District. WGL shall maintain data sets for each Annual Project List in a machine-readable format on a cloud drive with access granted to the Commission and all interested Parties. In addition to providing a complete set of JANA model outputs, WGL shall include, with each Annual Completed Projects Report, data and information demonstrating JANA's performance in predicting actual leaks compared to its initial risk scores included in the previously submitted JANA model system outputs for that program year.⁴²⁹ This information shall include confidence interval testing and results by age and material category. Any lessons learned and/or updates made to the JANA model from the previous project year shall also be included in the Annual Completed Projects Report.⁴³⁰ Annual Completed Projects Reports shall be filed within ninety (90) days of the conclusion of the previous program year.⁴³¹

148. The Commission finds that the Modified District SAFE Plan warrants a robust and thorough review of the annual project list selection. For the Year 1 Annual Project List, WGL shall

⁴²⁸ See e.g.: the dataset included in WGL's Response to OPC Data Request No. 8-3, filed October 6, 2025, for information to be included.

⁴²⁹ See e.g.: Exhibit WG (3E)-1 (Oliphant Supplemental Testimony).

⁴³⁰ See WG (2A) at 13:21-14:1 (Oliphant Rebuttal Testimony); OPC (3A) at 5:7 (Fitzhenry Supplemental Testimony). JANA is able to be recalibrated on an annual basis.

⁴³¹ E.g., a District SAFE program year that begins on July 1, 2026, will end June 30, 2027, and have a Completed Projects Report due no later than September 30, 2027.

have thirty (30) days from the date of this Order to submit a proposed Annual Project List (Year 1 June 30, 2026 – July 1, 2027), with subsequent annual project lists to be filed 120 days prior to the start of the subsequent project year of the modified District SAFE program. In turn, interested parties shall have ten (10) days to file requisite Data Requests and forty-five (45) days to file objections on a proposed Annual Project List, allowing sufficient time for all parties to perform a more granular analysis of proposed projects.

I. Alignment with District Climate Goals

149. The Commission’s review of WGL’s proposed District SAFE Plan reveals that the Plan’s risk prioritization process provides asset-specific forecasts, identifying assets with the highest potential for future leaks, which are further differentiated based on potential risk removed (risk reduced per dollar spent) to align with PHMSA’s safety standards and best practices for risk management. We acknowledge that main replacement activities are among the most effective means of reducing a utility’s direct operational emissions.

150. DCG, OPC, and Sierra Club all put forward arguments that WGL has failed to propose a plan that aligns with the District climate goals. The Commission believes that, with the modifications noted herein, the Modified District SAFE Plan will assist the District in meeting its climate goals by removing leak-prone assets before they begin leaking, thereby directly reducing methane emissions and potentially preventing hidden “super emitters” on the Company’s system. Therefore, the Commission is satisfied that the Modified Plan will support the District’s climate goals by directly reducing fugitive methane emissions.⁴³² The Commission believes that coordination with the District’s electrification programs and clarification of WGL’s role therein will be critical moving forward.

151. The Commission finds that the Modified District SAFE Plan, as modified, strikes an appropriate balance by addressing immediate safety concerns and meeting climate objectives by prioritizing the highest risk reduction while minimizing the risk of stranded assets. We are persuaded that the District SAFE Plan, with modifications set forth in this Order, is in alignment with the District’s climate goals.

i. Alternative Techniques and Non-Pipe Alternatives (“NPAs”)

152. The Commission believes there needs to be more than simple systematic consideration. The Commission recognizes that there may be various alternatives that could be more cost-effective, such as joint encapsulation, cast-iron sealing, targeted repairs, and rehabilitation techniques, including cured-in-place liners, cast-iron joint encapsulation, cast-iron sealing, or other technologies. The Commission is persuaded by the parties’ arguments that WGL should be required to analyze NPAs and provide an explanation that requires WGL to demonstrate, when submitting the proposed project list, that the replacement could not be avoided through an NPA for each submitted project.

⁴³² WG (E) at 16:8-11 (Oliphant Direct Testimony).

153. The Commission defines NPAs as a means of mitigating leak risks without requiring the need for new (replacement) pipe installation. As stated in Order No. 22003, the Commission reaffirms that wholesale replacement of pipes is not necessarily the most cost-effective approach to risk mitigation. WGL indicates that when developing its annual project lists, the Company will systematically consider alternatives to replacement. We believe that several of the other measures proposed by the parties should be evaluated for cost-effectiveness as alternatives for deployment.

154. The Commission finds that the additional requirement to consider NPAs will ensure transparency and aid in the evaluation of the proposed projects on the list selected for replacement and in turn lead to more repairs. Therefore, the Commission directs WGL to include an explanation of why replacement is the most effective method of risk mitigation for each project in its Annual Project List submission. This explanation shall include any NPAs, including pipeline abandonment, considered to mitigate risk for any of the included pipe segments, and shall include a justification to pursue replacement instead. These explanations shall be substantive and project specific – each justification must be supported by internal engineering analysis, documented operational assessment, or established industry best practice or regulatory guidance, and shall provide sufficient detail to independently evaluate whether replacement was the most appropriate response to the identified risk.

ii. Customer Choice Pilot Program, Stranded Assets, and Electrification

155. In addition to a risk-based project prioritization approach, WGL has proposed a Customer Choice Pilot Program that will permit customers to opt out of receiving natural gas service and allow for the abandonment of natural gas facilities. This program aims to minimize stranded assets while balancing the need to replace leak-prone, highest-risk pipe segments. The program, as proposed, allows customers scheduled for service line replacement to opt out if they plan to electrify their premises. As proposed, the pilot is limited in scope to only two of the three years of the program, applying only to customers whose service lines are specifically scheduled for replacement as part of the District SAFE Plan activities over the three-year program period.

156. While the Company's proposed Customer Choice program provides a mechanism to avoid unnecessary service line investments where customers have definitive electrification plans, the Commission finds that this has significant limitations as described below:

- a. **Practical and logistical limitations:** The three-year program creates practical constraints on the notification timelines. WGL proposes that no notifications would be made for Year 1 service replacements because there would be insufficient time to provide customers with adequate notice after program approval. This means the pilot program would effectively operate for only two of the three program years. Additionally, even the Year 2 notification timeline is constrained by the need to finalize the program design, with customers receiving approximately 11 months rather than a full year for decision-making.
- b. **Dynamic Project Selection:** WGL's risk-based prioritization approach means that project lists may evolve after initial notifications are sent. The dynamic nature of

project selection could result in customers not initially identified for replacement being added to project lists after the notification window has closed, or conversely, customers who received notifications having their service replacements delayed or cancelled. This uncertainty could complicate customer decision-making and planning. Additionally, as abandonment in lieu of replacement is generally lower cost, high adoption rates by customers may result in significant changes in expected annual spending levels and thus expected replacement rates.

- c. **Limited scope and coordination deficiencies:** The pilot's scope is constrained to those customers already scheduled for service replacement, and the program lacks coordination with District electrification programs, incentives, or planning efforts. DCG and other intervenors have noted that this creates a reactive rather than strategic approach to managing stranded asset risk.

157. The Commission finds the Company's proposal provides practical advantages since the limited scope allows for manageable implementation, and data collection is not overly burdensome administratively. The program's focus on customers already scheduled for replacement ensures that the pilot addresses situations where stranded asset risk is most imminent. We are persuaded that the program's voluntary nature respects customer choice while providing an option for those already planning electrification. In addition, the proposal to automatically abandon services with no usage for more than 24 months demonstrates a level of proactive response to the parties' concerns about stranded assets.

158. However, the Commission agrees with DCG that several adjustments will improve the Customer Choice Pilot Program. In an effort to address the identified program limitations, the Commission believes that WGL should implement the program as noted below:

- a. WGL is directed to implement a graduated approach to notification windows that accounts for program startup constraints: provide a minimum of six months' notice for service-only replacement projects in Year 1, 12 months' notice for all service replacements in Year 2, and 18 months' notice for all service replacements in Year 3. This recognizes the practical limitations while progressively improving customer planning time.
- b. In addition, rather than notifying only customers whose work is definitively scheduled, WGL is directed to provide initial notifications to a broader group of customers when their service appears on the list of potential replacements based on risk scores, even before the Commission approves the Annual Project List. We believe that follow-up notifications can confirm or modify timelines as project lists are approved and allow the company to better prioritize replacements once they receive customer selections.
- c. The Commission also directs WGL to coordinate with DOEE, DDOT, and other relevant District agencies to align pilot notifications with any available electrification programs, incentives, or technical assistance as those programs mature. We believe that establishing formal information-sharing protocols will

help to ensure customers receive comprehensive information about electrification options and support.

159. WGL shall also provide participating customers with information about available District programs, financing options, and technical resources to support electrification decisions, rather than simply offering the opt-out mechanism.

160. The Commission directs WGL to implement systematic data collection and reporting requirements including customer response rates, reasons for participation or non-participation, electrification technologies chosen, timeline from notification to conversion, estimated avoided infrastructure costs, and challenges encountered with the dynamic project selection process and inform future programs to encourage customers to opt-in for future opportunities.

161. The Commission directs WGL to conduct a comprehensive program evaluation at the conclusion of the three-year District SAFE period with stakeholder input to assess program effectiveness, identify barriers to participation, evaluate the impact of notification timing variations, and develop recommendations for program enhancement or broader implementation in future replacement program iterations. The Commission directs the Company to file the results of this evaluation on the Customer Choice Pilot Program by September 30, 2029. Parties may file comments within thirty (30) days and reply comments within forty-five (45) days of the evaluation's filing.

162. The Commission denies WGL's request to include O&M costs associated with the Customer Choice Pilot Program in the surcharge. O&M costs can be submitted in the next base rate case proceeding for consideration by the Commission.

J. Modified District SAFE Enhanced Compliance, Reporting, and Performance Monitoring:

163. In this Order, the Commission directs WGL to undertake a number of new or enhanced reporting requirements to be used in conjunction with certain reporting requirements from the PIPES 2 Plan. The modified District SAFE Plan's reconciliation and reporting requirements are detailed below:

164. WGL shall provide a status update on the fifteen (15) miles of pipeline previously identified for potential abandonment, within thirty (30) days of the date of this Order.

165. For Year 1, WGL shall file the Annual Project List with a complete JANA model output for the entire system in the District within thirty (30) days of this Order, by April 3, 2026;

166. For Year 2 and Year 3, WGL shall file the Annual Project List with a complete JANA model output by March 2, 2027, and March 2, 2028.

167. Given the voluminous amount of data required by the Commission to support the Company's filing, the Commission has modified the review period for interested Parties to

evaluate the Company's Annual Project list from 30 days to 45 days. The timeline is outlined below:

- a. WGL shall present the results of the JANA model output and proposed Year 1 Annual Project List in a Technical Conference within seven (7) days of the filings; Therefore, the Commission directs Staff to convene the JANA model output and proposed Year 1 Annual Project List Technical Conference within thirty-seven (37) days of the date of this Order;
- b. Data Requests ("DR") to WGL are due within ten (10) days of the filing of the Annual Project List;
- c. WGL's responses and/or objections to DRs are due within five (5) business days from the submission of a DR;
- d. Follow-up DRs are due within three (3) business days of service, and any objections to such follow-up requests within two (2) business days;
- e. Motions are due within three (3) business days from the service of any written objection, and responses are due within two (2) business days of service of the motion. Prior to filing an objection and /or motion, the parties shall consult with each other and attempt in good faith to resolve all discovery disputes – the motion must specify the dates and times of all consultations to resolve the discovery dispute;

168. WGL shall maintain data sets for each Annual Project List in a machine-readable format on a cloud drive with access granted to the Commission and all interested Parties. With each Annual Project List submission, WGL is directed to include the following items, at a minimum, for each project:

- a. Project BCA Number;
- b. Project Name/Location;
- c. Ward;
- d. Project BCA Status;
- e. Feet of Main to be abandoned in the program Year by material type and pipe size;
- f. Total feet of Main to be abandoned in the program Year;
- g. Contingent Main to be abandoned in the program Year;
- h. Feet of Main to be installed in the program Year by pipe size;
- i. Total estimated Feet of Main to be installed in the program Year;
- j. Total affected Services in the program Year;
- k. Class 3 Cost Estimate for the Program Year;
- l. Feet of Main to be abandoned for the entire Project by material type and pipe size;
- m. Total Feet of Main to be abandoned for the entire Project;
- n. Feet of Main to be installed for the entire Project by pipe size;
- o. Total estimated Feet of Main to be installed in the entire Project;
- p. Total affected Services for the entire Project;
- q. Class 3 Cost Estimate for the entire Project;
- r. Estimated Construction Start Date;
- s. Estimated Construction Completion Date;
- t. Estimated Paving Completion Date;

- u. Risk Reduced per Dollar Spent (RRPD) Score; and
- v. Explanation of the need for replacement and any NPAs considered.

169. With each annual JANA model output filing, WGL is directed to provide a complete set of JANA model outputs⁴³³, including risk scores for all pipe segments (selected and not selected), and maintain the data in a machine-readable format on a cloud drive with access granted to the Commission and all interest Parties that execute a non-disclosure agreement.

170. WGL shall present and discuss various Non-Pipe Alternatives in a Technical Conference. Therefore, the Commission directs Staff to convene the NPA Technical Conference within ninety (90) days of the date of this Order.

171. WGL is directed to file an Annual Completed Projects Report by September 30th of each year (ninety (90)) days after the completion of each Program Year. This filing shall contain the following items:

- a. Planned miles of Main to remediate;
- b. Actual miles of Main remediated;
- c. Planned Number of affected Services;
- d. Actual Number of affected Services;
- e. Total Planned Costs for the Program Year;
- f. Total Actual Costs for the Program Year;
- g. A breakout of the Total Actual Costs for Direct, Design and Development and Other Allocated Costs for the Program Year;
- h. BCAs included in the annual threshold;
- i. Cost for Projects included in the annual threshold;
- j. Total Number of Active and Completed BCAs;
- k. Total Number Customers converted from low to medium pressure via modified District SAFE;
- l. The two-year rolling average for unit costs for Mains by pipe size;
- m. The two-year rolling average for unit costs for Services;
- n. Any excess costs above the two-year rolling average unit costs for Mains by pipe size; and
- o. Any excess costs above the two-year rolling average unit costs for Services.

172. Additionally, for any project with a variance of at least +/- 5% (above or below five percent) from the initial cost estimate and/or submitted project scope, the Company shall provide the following information in its Annual Completed Projects Report as appropriate:

- a. Project BCA Number
- b. Project Location\Name
- c. Design Estimate Feet of Main to install
- d. Design Estimate Feet of Main to remediate
- e. Design Estimate Number of Services to replace

⁴³³ At a minimum providing the same categories as the dataset included in WGL's Response to OPC Data Request No. 8-3, filed October 6, 2025.

- f. Design Estimate Number of transferred Services
- g. Design Estimate Number of installed Services
- h. Actual Feet of Main installed
- i. Actual Feet of Main remediated
- j. Actual replaced or abandoned Services
- k. Actual Services installed
- l. A detailed explanation for any changes in Project scope
- m. Planned Construction Start Date
- n. Planned Construction End Date
- o. Actual Construction Start Date
- p. Actual Construction End Date
- q. A detailed explanation for any changes in the schedule
- r. Design Estimate for Contractor Costs
- s. Design Estimate for Paving Costs
- t. Design Estimate for Direct Costs
- u. Design Estimate for allocated Costs
- v. Design Estimate for Total Costs
- w. Actual Contractor Costs
- x. Actual Paving Costs
- y. Actual Direct Costs
- z. Actual Allocated Costs
- aa. Actual Total Costs
- bb. A detailed explanation for any variance in Costs

173. With each Annual Completed Projects Filing, WGL is directed to submit data and information demonstrating JANA's performance in predicting actual leaks compared to its initial risk scores included in the previously submitted JANA model system outputs for that program year.⁴³⁴ This information shall include confidence interval testing and results by age and material category. Any lessons learned and/or updates made to the JANA model from the previous project year shall also be included in the Annual Completed Projects Report.

174. WGL is directed to file a Semi-Annual Completed Projects Report by March 30th of each year (nine (9)) months after the beginning of each Program Year. The filing shall contain the following items:

- a. Planned miles of Main to remediate;
- b. Actual miles of Main remediated;
- c. Planned Number of affected Services;
- d. Actual Number of affected Services;
- e. Planned Total Costs;
- f. Total Actual Costs;
- g. Actual Direct, Design and Development and Other Allocated Costs;
- h. Total Number of Active and Completed BCAs; and
- i. Total Number of Customers converted from low to medium pressure.

⁴³⁴ Exhibit WG (3E)-1 (Oliphant Supplemental Testimony).

175. At the end of Year 2 of the Modified District SAFE Plan, WGL is directed to file a Two-Year Performance Report detailing their combined replacements, and expenditures by September 30, 2028. Upon receipt of the Two-Year Performance Report, Parties will have thirty (30) days to comment on the Company's performance. The Two-Year Performance Report shall include the following details by material type and pipe size:

- a. Total remediated miles of main
- b. Total remediated services
- c. Average unit costs
- d. Total expenditures

176. WGL is required to provide a two-year and three-year combined Completed Projects performance report, including leak trends.

177. WGL is directed to file a Current Factor Report each year providing the detailed calculation of the Modified District SAFE Current Factor, including but not limited to: Plant Additions, Rate of Return on Investment, Revenue Conversion Factor, Depreciation, Interest Synchronization, and Carrying Cost. The Current Factor Report for Year 1 shall be filed by April 30th, 2026, to become effective on July 1, 2026.⁴³⁵ For subsequent years, WGL shall file the Current Factor Filing by April 30th, to become effective on July 1 of that year.

178. WGL is directed to file a Threshold Reconciliation report by September 30th of each year (ninety (90) days after the completion of each Program Year) providing a reconciliation that demonstrates that the applicable threshold limit (*i.e.*, \$10 million, \$12.5 million and \$15 million for Program Years 1 through 3) has been met for each applicable Current Factor filing, and include the following information: a list of projects that make up the amount that would be considered "normal" activity, and recorded in a specific District SAFE Threshold Account subject to Commission review and approval in the next applicable base rate case. The report shall include, but not be limited to, the Project BCA number, Project location and description, material type, date of Project completion, and amount spent. The Threshold Reconciliation report shall also provide the total balance of costs that would be considered "normal" capital expenditure, and recorded in a District SAFE Threshold Account to be recovered in the next applicable base rate case.

179. WGL is directed to file a Reconciliation Factor Report by September 30th each year (ninety (90) days after the completion of each Program Year) for the previously completed Program Year, providing the calculation of the over/under-collection amounts by customers associated with the actual District SAFE Costs accrued during the twelve (12)-month period. This report shall include but not be limited to: the actual Plant Additions, Rate of Return on Investment, Revenue Conversion Factor, Depreciation, Interest Synchronization, and Carrying Cost. The Reconciliation Factor report shall also include a list of the actual projects completed, the Project BCA number, Project location and description, material type, date of Project completion, and amount spent.

180. WGL is directed to implement a Customer Choice Pilot Program and provide reporting as outlined below:

⁴³⁵ Although the Current Factor is applicable and effective starting on July 1, it can only recover expenditures after the threshold for the applicable year has been met.

- a. Develop and implement a graduated Customer notification approach by providing a minimum of six (6) months' notice for Service-only replacement Projects in Year 1, 12 months' notice for all Service replacements in Year 2, and 18 months' notice for all Service replacements in Year 3;
- b. Provide initial notifications to customers of the timeline of when their service appears on the list of potential replacements based on JANA risk scores;
- c. Following the Commission's approval of the annual Project List, WGL shall issue a follow-up notification to confirm or modify a customer's timeline;
- d. Provide participating customers with information about available District programs, financing options, and technical resources to support electrification decisions, rather than simply offering the opt-out mechanism;
- e. Implement systematic data collection and reporting requirements, including customer response rates, reasons for participation or non-participation, electrification technologies chosen, timeline from notification to conversion, estimated avoided infrastructure costs, and challenges encountered with the dynamic project selection process, and inform future programs to encourage customers to opt-in for future opportunities; and
- f. Conduct a comprehensive program evaluation at the conclusion of the three-year modified District SAFE program with stakeholder input to assess program effectiveness, identify barriers to participation, evaluate the impact of notification timing variations, and develop recommendations for program enhancement or broader implementation in future replacement program iterations. WGL is directed to file the results of this evaluation of the Customer Choice Pilot Program by September 30, 2029. Parties may file comments within thirty (30) days and reply comments within forty-five (45) days of the evaluation's filing.

K. Program Implementation

181. WGL is directed to complete a PIP for the modified District SAFE program as approved in this Order. The completed PIP shall be filed within 180 days of the date of this Order. At a minimum, the PIP shall provide details on major assumptions, program risks, program schedule, project and program level reporting, involvement of key stakeholders, cost estimation methodology, and long-term resource planning to ensure the Company can execute the modified District SAFE program effectively over the three-year period. In addition, the PIP should incorporate the recommendations from the Continuum Audit report including the following items:

- a. Variance Analysis (Audit Recommendation 1.1);
- b. EVA Program (Audit Recommendation 2.4);
- c. Integrated and Resource Loaded Schedule (Audit Recommendation 2.5);
- d. Accountability for Cost Estimates (Audit Recommendation 2.6);
- e. Project EVA: Resource Loaded & Integrated Schedule (Audit Recommendation 2.8);
- f. Dashboard Augmentation (Audit Recommendation 2.10);
- g. Executive Summary for the PIP (Audit Recommendation 2.12);
- h. Document Accuracy (Audit Recommendation 3.1); and

- i. File Nomenclature (Audit Recommendation 3.2);

L. Studies and Analysis Reporting

182. WGL is directed to file a formal assessment for Internal versus External crew usage by December 31, 2027, and an Industry Peer Review study no later than June 30, 2029.

M. Employment Opportunities

183. WGL is directed to provide employment opportunity information for District residents as a separate attachment to the Annual Project List. The employment opportunities attachment will provide details on any contractors or subcontractors affiliated with the Company to support projects with the Annual Project List by April 3, 2026. For Year 2 and Year 3, WGL shall include information with the Annual Project list by March 2, 2027, and March 2, 2028, respectively. Following the conclusion of Program Year 3, WGL shall make a filing indicating the total number of District residents that were hired to work on the Modified District SAFE Plan.

N. Tariff

184. The Commission directs the Company to file a new compliance tariff for General Service Provisions 28, reflecting modified District SAFE Accelerated Pipe Replacement, with the changes mandated by this Order within thirty (30) days.⁴³⁶

O. Integrated Energy Planning

185. The Commission has opened an Integrated electric Distribution System Planning docket in *Formal Case No. 1182*, and today opens a parallel Integrated Natural Gas Distribution System Planning (“INGDSP”) docket to be discussed further in *Formal Case No. 1187*; and

VII. CONCLUSION

186. The Commission, having duly considered the entire record in this proceeding, including all the filed testimony and exhibits, the comments, the affidavits, the data requests and responses introduced into the evidentiary record, testimony at the evidentiary hearing, post-hearing Briefs and taking into account Commission precedent, and comments from the community hearings, the Commission approves a restructured Modified District SAFE Plan to ensure continued safety and reliability of the natural gas distribution system in the District.

VIII. FINDINGS OF FACT AND CONCLUSIONS OF LAW

187. Based on the evidence in the record of this proceeding, the Commission makes the following findings of fact and conclusions of law:

⁴³⁶ The Commission notes that because this is a compliance tariff filing parties will have five (5) days to challenge the tariff under 15 D.C.M.R. § 296.3 (1987).

188. The Commission approves a Modified District SAFE Plan for a three-year period beginning July 1, 2026, through June 30, 2029;

189. The Modified District SAFE Plan is reasonable and is in the interest of the public;

190. The Modified District SAFE Plan focuses on immediate risk mitigation while striking a balance by reducing the risk of stranded assets and is in alignment with the District's Climate goals;

191. That Washington Gas Light Company's District SAFE Plan, as modified and approved by this Order, is in compliance with Commission Order No. 22003;

192. That Washington Gas Light Company's proposed risk prioritization methodology utilizing the JANA model targets the immediate high-risk, aging, and leak-prone materials and is approved;

193. The Modified District SAFE Plan project selection will be strictly based on Risk Reduction per Dollar Spent using JANA model risk assessment tool;

194. That the Company's proposed District SAFE Plan budget is reduced and a \$150 million budget for the modified District SAFE Plan is adopted for a period of three Program Years (PY), as follows: PY1, July 1, 2026 - June 30, 2027 (\$45 million); PY2, July 1, 2027 – June 30, 2028 (\$50 million), and PY3, July 1, 2028 – June 30, 2029 (\$55 million);

195. That cost control measures for the modified District SAFE Plan are adopted as explained in this Order;

196. That it is necessary and reasonable to allow a surcharge recovery mechanism to address safety concerns and maintain parity with the District's peer Jurisdictions and conform to PHMSA's Call to Action;

197. That it is necessary to balance the accelerated cost recovery using a combination of a surcharge recovery mechanism and normal base rate recovery for a more cost-effective plan than in the previously approved PROJECT*pipes* program;

198. That any pipeline replacement or similar infrastructure expenditures below the authorized annual threshold shall be considered "normal" activity, and recorded in a specific District SAFE Threshold Account for tracking purposes, and subject to typical rate case recovery similar to any other capital expenditure;

199. That, expenditures beyond the authorized threshold for each year of the approved three-year program would be eligible for accelerated cost recovery through the Modified District SAFE surcharge mechanism up to that year's budget cap;

200. That the modified District SAFE Plan shall have a "Threshold-based recovery" mechanism, which is an annual "threshold" amount of \$10 million for Year 1 (22% of the modified

District SAFE Year 1 budget), \$12.5 million for Year 2 (25% of the modified District SAFE Year 2 budget), and \$15 million for Year 3 (27.2% of the Modified District SAFE Year 3 budget);

201. All modified District SAFE expenditures, surcharge spending or otherwise, shall be rolled into WGL's rate base case during the next applicable rate case proceeding for the Commission's consideration and be subject to further prudence review;

202. That the recovery of the cost to abandon high-risk pipes shall be allowed only when they are directly associated with other installations on replacement projects;

203. That the Company shall file an Annual Completed Projects report providing information on work performed within the Modified District SAFE Plan;

204. That the Modified District SAFE Plan expenditures shall remain subject to the Commission's Project List review and approval;

205. That the Company when developing the Project List will be required to demonstrate that a replacement project could not be completed effectively utilizing an NPA;

206. That Advanced Leak Detection is a tool for leak survey and repair rather than risk modeling and is best considered in *Formal Case No. 1178* where we are currently evaluating the Company's leak survey and pipeline repair programs;

207. That Washington Gas Light Company's Customer Choice Pilot Program as modified is an appropriate way to minimize the risk of stranded assets while balancing the need to replace leak-prone high-risk pipe segments;

208. That Washington Gas Light Company's Customer Choice Pilot Program as modified is appropriately focused on customers already scheduled for pipeline replacement, ensuring that the pilot addresses situations where stranded asset risk is most imminent;

209. That Washington Gas Light Company shall coordinate with DOEE, DDOT, and other relevant District agencies to align pilot notifications with any available electrification programs, incentives, or technical assistance as those programs mature;

210. That Washington Gas Light Company shall conduct a comprehensive program evaluation of the Customer Choice Pilot Program at the conclusion of the Modified District SAFE Plan with stakeholder input to assess program effectiveness, identify barriers to participation, evaluate the impact of notification timing variations, and develop recommendations for program enhancement or broader implementation in future replacement program iterations;

211. That all the Reporting and Compliance requirements adopted by this Order provide adequate transparency for regulatory oversight; and

212. That an Integrated Natural Gas Distribution System Planning proceeding shall be discussed further in Formal Case No. 1187 INGDP docket.

THEREFORE IT IS ORDERED THAT:

213. The District of Columbia Government's Motion to Correct the Hearing Transcript is **GRANTED**;

214. Washington Gas Light Company's District Strategic Accelerated Facilities Enhancement Plan is **APPROVED WITH MODIFICATIONS** as noted within;

215. Washington Gas Light Company is **DIRECTED** to present and discuss JANA model output with a proposed Year 1 Annual Project List and Various Non-Pipe Alternatives in technical conferences as described herein in paragraphs **167** and **170**;

216. Washington Gas Light Company is **DIRECTED** to file: (1) a Program Implementation Plan; and (2) Annual filings of Current Factor, a Reconciliation Factor Report, Threshold Reconciliation Report, and a Completed Projects Report, including other Compliance filings and Tariffs as described in paragraphs **177-181**.

A TRUE COPY:

BY DIRECTION OF THE COMMISSION:



CHIEF CLERK:

**BRINDA WESTBROOK-SEDGWICK
COMMISSION SECRETARY**

ATTACHMENT A: COMMUNITY COMMENTS AGAINST DISTRICT SAFE PLAN

Name	Date
12jberger	November 14, 2024
Abbie Ginis	November 18, 2024
Abigail Renner	November 18, 2024
Adam Kent	August 20, 2024
Adam Roberts	November 18, 2024
Adrien-Alice Hansel	November 4, 2024
Advaitarun@gmail.com	November 14, 2024
Aiyana Adams	November 12, 2024
Aklufrano@gmail.com	November 20, 2024
Aklufrano@gmail.com	November 20, 2024
Alan Eyre	November 20, 2024
Alan Propp	October 25, 2024
Alberto Oxlaj	November 18, 2024
Alex Cogan	November 18, 2024
Alexander Obersht	October 28, 2024
Alexander Orman	October 29, 2024
Alexandra Brown	October 31, 2024
Alexia Kelley	October 31, 2024
Ali Hadjarian	November 22, 2024
Alisa Fomenko	November 18, 2024
Alixandra Underwood	November 4, 2024
Allen Hengst	October 25, 2024
Allyse Minton	November 13, 2024
Alyson Bancroft, MPH	November 18, 2024
Alyssa Alvey	November 8, 2024
Alyssa Proudfoot	November 18, 2024
Amanda Kleinman	November 4, 2024
Amber S. Gruner	November 1, 2024
Amy Hubbard	November 13, 2024
Amy Thomas	November 12, 2024
Ana Herrera	October 30, 2024
Ana Sanchez	October 30, 2024
Ana Velasquez	November 18, 2024
Ana Young	November 13, 2024
Anaia Walker	December 2, 2024
Andie Wyatt	November 14, 2024
Andrea Beck	November 18, 2024
Andrea Orozco	November 14, 2024
Andrea Rosen	October 28, 2024
Andrei Ponze	November 18, 2024
Andrew Bautista	November 15, 2024
Andrew Bockover	November 5, 2024
Andrew Devine	November 18, 2024
Andrew Lovejoy	November 18, 2024

Andy Miller	November 18, 2024
Angel Strong	November 19, 2024
Angela Ambroz	November 20, 2024
Anita Beier	November 19, 2024
Ann Duan	October 30, 2024
Anna Woodbury	August 23, 2024
Anne Cauman	November 13, 2024
Anne Debuys	October 25, 2024
Anne Debuys	October 30, 2025
Anne Stauffer	November 3, 2025
Annette Lee	November 8, 2024
Annette Olson	November 18, 2024
Annina Wells	November 21, 2024
Anthony Jansen	August 12, 2024
Anthonychiado97@gmail.com	November 22, 2024
Archer Gallivan	November 20, 2024
Arthur Sprogis	October 31, 2024
Aryn Kelly	November 25, 2024
Arynne Crane	November 13, 2024
Ashley Joo	October 30, 2024
Athena Viscusi	November 18, 2024
Athene Hodges	November 13, 2024
Audrey@earthrights.org	November 19, 2024
Avram Reisman	November 18, 2024
Ayesha Mehrotra	November 19, 2024
Ayla Bailey	November 20, 2024
Ayla Frost	October 29, 2025
Ayla Frost	October 25, 2024
B Ormond	November 18, 2024
Bakari Wilkins	October 25, 2024
Barbara Fleck	November 20, 2024
Barbara Fleck	November 20, 2024
Barbara Geiger	November 21, 2024
Barbara Kraft	November 21, 2024
Beatrice Aronson	October 30, 2024
Beatrice Browne	October 31, 2024
Beatrice Browne	November 20, 2024
Beatrice Stephen-Pons	August 21, 2024
Ben Barge	November 19, 2024
Ben Menchelli	November 15, 2024
Ben Whitcher	November 18, 2024
Bennett Thompson	November 15, 2024
Bettstew@gmail.com	November 21, 2024
Betty Paige	November 13, 2024
Betty Sinowitz	November 18, 2024
Bittamcps@gmail.com	November 19, 2024
Blair Gilbert	November 13, 2024
Bodhi Vasilopoulos	November 26, 2024
Bradford Patterson	August 16, 2024

Brian Levy	November 13, 2024
Brooks Robinson	November 15, 2024
Brooks Robinson	November 21, 2024
Bruce Simons Morton	October 28, 2025
Cafini Z	November 5, 2024
Camilla Battoni	November 8, 2024
Campbell Howe	November 19, 2024
Cara Fulton	October 31, 2025
Cara Spencer	November 19, 2024
Carl Roberts	November 4, 2024
Carla Adams	November 18, 2024
Carlin and Chris Anderson	October 27, 2025
Carlin Anderson	October 28, 2024
Carlos Hill	November 12, 2024
Carol Spring	October 1, 2025
Carolyn Neuneubel	October 31, 2024
Carolyn Wiggins	November 19, 2024
Casper Keanu	October 30, 2024
Catherine Ferguson	November 13, 2024
Catlyn Doucette	November 20, 2024
Cecilia Kane	November 19, 2024
Cecilia Smith	November 19, 2024
Cesar Salgado	November 18, 2024
Charles Ferguson	November 13, 2024
Charles Spring	November 7, 2024
Chiara Terzuolo	November 13, 2024
Chris Ingram	November 19, 2024
Christina Ferreri	August 13, 2024
Christina Ferreri	November 14, 2024
Christine Jackson	October 28, 2024
Christine Jacobs	November 18, 2024
Christine Powell	November 20, 2024
Christine Powell	November 13, 2024
Christopher Bangs	October 30, 2025
Christopher Pfutzner	November 1, 2024
Cierra Culbertson	November 18, 2024
Citizens	October 15, 2024
Claire August	November 20, 2024
Claire August	November 20, 2024
Claire Douglass	August 12, 2024
Claire Hacker	August 20, 2024
Claire Hacker	November 5, 2025
Claire Hacker	November 1, 2024
Claire Mills	November 20, 2024
Clara Lincoln	November 21, 2024
Clarence Sykes	October 25, 2024
Clarissa Ihssen	November 13, 2024
Claudia Davis	November 19, 2024
Claudia Steiner	November 14, 2024

Cody Austin	November 18, 2024
Colin Murphy	November 25, 2024
Colin Stewart	November 6, 2024
Collette Kokesh	August 21, 2024
Conatyt@gmail.com	November 19, 2024
Cooper Klose	November 12, 2024
Courtney Levine	November 20, 2024
Crystal Cates Alvillar	November 18, 2024
Cullen Jones	November 12, 2024
D Zach Wall	November 20, 2024
Dacey Romberg	November 13, 2024
Dale Brown	November 18, 2024
Daniel Hankes	November 15, 2024
Daniel Peña	November 18, 2024
Daniel Smolyak	November 15, 2024
Daniel Woodiwiss	November 20, 2024
Dara Canchestr	November 20, 2024
Dara Canchestr	November 20, 2024
Darnell Granberry	November 18, 2024
Daryl Correa	November 18, 2024
David Frank	October 30, 2024
David Hill	November 18, 2024
David Hoffman	November 18, 2024
David N. Orem	November 18, 2024
David Sacks	October 31, 2024
David Whitehead	August 12, 2024
David Whitehead	October 30, 2024
David Zatyko	November 18, 2024
DC Resident	October 1, 2025
Debra M. Fox	November 13, 2024
Deirdre Joy	November 19, 2024
Delaney Dunster	November 19, 2024
Deleo AP	November 19, 2024
Denise Curry	October 27, 2025
Denise Curry	November 18, 2024
Denise Schlener	November 15, 2024
Diana Honesty	November 13, 2024
Diana R-Stephens	November 13, 2024
Dimitar Dolnooryahov	October 31, 2024
Dina Rodriguez	October 1, 2025
DJ McInturff	November 18, 2024
Doug Barker	November 4, 2024
Doug Barker	November 1, 2024
Doug Barker	October 28, 2025
Dylan Desjardens	August 16, 2024
East Peterson Trujillo	November 15, 2024
East Peterson-Trujillo	October 28, 2024
Eduarda Serafim	November 14, 2024
Eileen Nakahata	October 28, 2025

EK Mayes	October 30, 2024
Eleanor Slease	November 15, 2024
Elicweitzell@gmail.com	November 20, 2024
Elicweitzell@gmail.com	November 19, 2024
Elise Ferrer	November 21, 2024
Eliza Cava	November 13, 2024
Elizabeth Touma	October 28, 2025
Elizabethspencer7@gmail.com	November 20, 2024
Elizabethspencer7@gmail.com	November 20, 2024
Elle Joseph	November 18, 2024
Ellen Brody	November 20, 2024
Ellen Levine	November 20, 2024
Elthompson97@gmail.com	November 15, 2024
Emilie.dajer@gmail.com	November 19, 2024
Emily Dalton	November 18, 2024
Emily Fournier	November 13, 2024
Emily Irvine	November 18, 2024
Emily O'Connor	November 12, 2024
Emily Russell	November 12, 2024
Emilya Ventriglia	November 18, 2024
Emma Miniscalco	October 30, 2024
Emma Miniscalco	October 27, 2025
Emyoung90@gmail.com	August 23, 2024
Erich Martel	November 19, 2024
Erin Berkowitz	October 31, 2024
Erin Brantley	November 20, 2024
Erin Lea	November 19, 2024
Esieradzki.2@gmail.com	November 8, 2024
Esther Iverem	November 20, 2024
Eva Dammann	November 18, 2024
Eva Shpak	August 20, 2024
Evan.m.kenyon@gmail.com	November 15, 2024
Evelyn Fraser	October 28, 2025
Extinction Rebellion DC	February 25, 2025
F.L. Dammann	November 18, 2024
Florence Brooks	November 12, 2024
Forest Cinelli	October 29, 2024
Forrest Cinelli	November 18, 2024
Forrest Cinelli	October 1, 2025
Francine Raizes	November 4, 2025
Franklin Borre	November 15, 2024
Fred Dobb	October 29, 2025
Gabby McCall	November 18, 2024
Gabby Walton	November 19, 2024
Gabriel Boyajian	November 19, 2024
Gabriel Calderon	November 19, 2024
Gabriel Schirvar	November 20, 2024
Gabriel Schirvar	November 20, 2024
Gabrielle Tressler	November 19, 2024

Gabrielle Walton	November 13, 2024
Gail Hansen	May 29, 2025
Garrett Hennigan	November 13, 2024
Gbob.smither@gmail.com	November 20, 2024
Gecko Bella	November 20, 2024
Geena Marzouca	November 19, 2024
Ghermann05@gmail.com	November 19, 2024
Gina Weatherup	November 19, 2024
Giordanohardy@gmail.com	November 20, 2024
Gisell Lopez	November 19, 2024
GM	August 29, 2024
Grace Smith	November 8, 2024
Grace Swihart	November 19, 2024
Grace V. Alexander	November 20, 2024
Gracevalexander@gmail.com	November 20, 2024
Grahamreynold@pm.me	November 18, 2024
Greg Grass	November 19, 2024
Gustavo Navarrete	October 30, 2024
Gwendolyn Green	November 12, 2024
Haley Chatelaine	November 18, 2024
Hanna Hu	October 31, 2024
Hannah Brown	November 12, 2024
Hannah Daly	November 15, 2024
Hannah Honeycutt	November 20, 2024
Hannah Honeycutt	November 20, 2024
Hannah Horobin	November 18, 2024
Hannah Lebowitz-Lockard	November 12, 2024
Hannah Lipstein	November 20, 2024
Hannah Thorner	November 19, 2024
Hannah Turley	August 20, 2024
Harrison Pyros	November 19, 2024
Harvey Simon	November 13, 2024
Haylee Millikan	November 12, 2024
Hazel Down	November 20, 2024
Heather Kaye	November 13, 2024
Helen Bonnyman	December 5, 2024
Helen Epps	October 28, 2025
Helen Luryi	November 18, 2024
Hinterlgrrove	October 31, 2024
Holly Pollinger	October 28, 2025
Holly Pollinger	November 12, 2024
Holly Pollinger	November 19, 2024
Hope.glastris@gmail.com	November 20, 2024
Hope.glastris@gmail.com	November 20, 2024
Hunter Grove	November 19, 2024
Husani Cacho	September 9, 2024
Ian Clasbey	October 28, 2025
Iliana Hagenah	November 18, 2024
Imants Brolis	November 4, 2024

Ingrid Wilder	November 14, 2024
Inkberko@gmail.com	November 19, 2024
Isaac Bloom	November 15, 2024
Isabel Turi	November 14, 2024
Isabella Hinrichs	November 12, 2024
Isadora Karathanos	November 18, 2024
Ismael Rodriguez	October 1, 2025
Izy Carney	November 18, 2024
J A	November 18, 2024
J Byrne	November 18, 2024
J.M. Hiatt	November 5, 2025
Jack Eichholz	November 18, 2024
Jacob Hackman	November 6, 2024
Jacob Leaman	November 20, 2024
Jacob Leaman	November 20, 2024
Jacob Russin	December 10, 2024
Jacqueline Saulnier	December 23, 2024
Jacquelyn Helm	November 25, 2024
James Beck	November 13, 2024
James Driver	November 27, 2024
James Solit	November 12, 2024
Janet Walker Chirlin	November 18, 2024
Jason Meggs	November 12, 2024
Jax Mack	November 18, 2024
Jean Stewart	October 31, 2024
Jeannine Bruno	November 19, 2024
Jeff Gustafson	November 18, 2024
Jeffrey Anderson	August 22, 2024
Jenna North	November 19, 2024
Jennifer Gregory	November 13, 2024
Jeremyemef@gmail.com	November 19, 2024
Jerry Lee	October 28, 2024
Jesse B	November 19, 2024
Jessica Moyer	November 19, 2024
Jessicalobl@gmail.com	November 13, 2024
Jill Russo-Downey	November 13, 2024
Jimisaaclewis@gmail.com	November 20, 2024
Jimisaaclewis@gmail.com	November 20, 2024
Jimmycr509@gmail.com	November 8, 2024
Joe Baillie	November 18, 2024
Joe Cherichello	October 30, 2024
Joe Good	November 12, 2024
Joel Cohn	November 20, 2024
Joelle Rudney	November 14, 2024
Johanna Bockman	November 13, 2024
John Curtis	October 28, 2025
John Drollinger	November 15, 2024
John Lacey	October 31, 2024
John McLaughlin	November 6, 2024

John Payne	November 19, 2024
John Wiggins	November 4, 2024
Jonathan Herz	November 18, 2024
Jonathan Herz	June 17, 2025
Jonathon Shirazi	November 12, 2024
Jose Enrique Calvo Elhauge	November 21, 2024
Joseph Martin	November 19, 2024
Joseph Rojas	November 4, 2024
Josephine Swaney	November 8, 2024
Joy Rodman	November 25, 2024
Jpowers03@gmail.com	November 19, 2024
Jrweyl@gmail.com	November 25, 2024
Juan Cuellar	October 29, 2024
Judith Howell	November 18, 2024
Judith Rabinowitz	November 18, 2024
Judy Gayer	November 20, 2024
Juia Fine	October 31, 2024
Julia Fine	November 19, 2024
Julia Keane	November 15, 2024
Julia Nation	November 20, 2024
Julia Nation	November 20, 2024
Julia Petracca	November 19, 2024
Julia Stevenson	October 7, 2024
Julie Meyer	November 13, 2024
Julie Wu	November 18, 2024
Julmy Diaz	November 19, 2024
Justin Artis	November 15, 2024
Juuso Laine	November 19, 2024
K Yonks	October 28, 2024
K. M.	November 19, 2025
Kaeley McEvoy	November 20, 2024
Kandace Davis	August 23, 2024
Kara Brown	November 18, 2024
Karen Branan	October 25, 2024
Karen Gladding	November 13, 2024
Karen Slaney	November 20, 2024
Karin Werner	November 6, 2024
Karl Dawson	November 18, 2024
Karl Fellenius	November 15, 2024
Kate Bockover	November 4, 2024
Kate Jursca	August 21, 2024
Kate Sanders	November 13, 2024
Kate Sugarman	November 20, 2024
Kathryn Blanco	November 14, 2024
Kathryn Plimpton	November 18, 2024
Kathy Bartolomeo	November 8, 2024
Kathy Doan	November 20, 2024
Katie Hodge	November 19, 2024
Katie Lotterman	November 8, 2024

Katie Meyer	August 8, 2024
Katie Meyer	October 28, 2024
Katie Ries	November 13, 2024
Kaye Stansbury	August 23, 2024
Kb866825@gmail.com	November 4, 2024
Kelli Sampson	November 8, 2024
Kelly Wildermuth	November 13, 2024
Kelsey Rawcliffe	November 18, 2024
Kerri Monk	October 28, 2024
Kevin Mulliss	November 12, 2024
Kevinwu388@gmail.com	November 19, 2024
Keya Chatterjee	August 21, 2024
Keya34@yahoo.com	November 13, 2024
Kiara Rutherford	November 18, 2024
Kimberlycapehart@yahoo.com	November 20, 2024
Kirstin De Mello	November 20, 2024
Kkrenichyn@gmail.com	November 19, 2024
Kristen Hengtgen	November 15, 2024
Kristie Miller	November 18, 2024
Kristin Centrella	August 21, 2024
Kristin McKinney	October 31, 2024
Kristy Donohue	November 8, 2024
Kurtis Hagans	November 19, 2024
Kymone Freeman	December 6, 2024
L Chris Hager	November 20, 2024
Lara Levison	October 28, 2024
Lara Levison	November 18, 2024
Larissa Asebedo	November 20, 2024
Laura Fagen	November 18, 2024
Laura O'Brien	November 20, 2024
Laura O'Brien	November 20, 2024
Laura Schubel	November 20, 2024
Laurel Hoa	October 31, 2024
Lauren Leclercq	November 20, 2024
Lauren Leclercq	November 20, 2024
Leah Zahniser	November 19, 2024
Ledwards2654@gmail.com	November 19, 2024
Leonard Rubin	October 27, 2025
Leonard Rubin	October 25, 2024
Leonard Rubin	November 13, 2024
Leonard Rubin	November 18, 2024
Lesleyahill0@gmail.com	November 8, 2024
Leslie Reiffen	November 18, 2024
Leslie Salazar	October 30, 2024
Liana Steinberg-Casper	December 23, 2024
Lida Skrzypczak	October 28, 2024
Lillian Zhou	November 22, 2024
Lily Komarow	February 18, 2025
Lina Hunt	November 15, 2024

Lindsay Herra	November 18, 2024
Lindsey Fincham	November 13, 2024
Lindseybuttel@gmail.com	November 8, 2024
Livio@american.edu	November 20, 2024
Liz Kendall	October 28, 2025
Liz McLaughlin	October 30, 2024
Lkauthen@gmail.com	November 19, 2024
Lorenz A. Wheatley	August 12, 2024
Lori Hayman	November 18, 2024
Lorraine Gray	November 20, 2024
Louis Fischer	November 19, 2024
Louis Fischer	October 27, 2025
Lparker@greenscheme.org	November 18, 2024
Lucas Minich	August 21, 2024
Luciapieto@gmail.com	November 20, 2024
Lucy Arthur	November 13, 2024
Luigi Nunez	August 23, 2024
Luigi Nunez	November 15, 2024
Luke Bostian-Valle	November 12, 2024
Lydia Scheel	November 4, 2024
Mackenzie Marcotte	August 19, 2024
Maddie Leonard	November 12, 2024
Madeline de Mahy	November 18, 2024
Madeline Liberman	December 23, 2024
Malika Mays	November 18, 2024
Mallorybrown99@gmail.com	November 13, 2024
Marc Imlay	November 4, 2024
Marc Imlay	November 19, 2024
Marcus Hoy	October 31, 2024
Margaret Staines	August 13, 2024
Margaret Staines	October 28, 2025
Marja Hilfiker	November 12, 2024
Marjory Donn	November 12, 2024
Mark Jenkins	October 28, 2024
Mark Rodeffer	October 31, 2024
Martha Byers	October 28, 2024
Martha Davidson	June 16, 2025
Martha Ekdahl	November 18, 2024
Martin White	November 18, 2024
Mary Alice Reilly	November 1, 2024
Mary J Feeherry	November 13, 2024
Mary Rieser	November 18, 2024
Mary Rooker	November 8, 2024
Mary Slaughter	November 20, 2024
Mary Vereen	November 18, 2024
Matt Gravatt	November 13, 2024
Matt@machination.org	November 19, 2024
Matthew Bevens	November 20, 2024
Matthew Erickson	November 13, 2024

Matthias Paustian	November 4, 2024
Max Broad	November 18, 2024
Max Hawla	November 19, 2024
Max Mozes	November 1, 2024
Maya DeHart	November 12, 2024
Mayajohnsonfraidin1041@gmail.com	November 18, 2024
Mayowa Amosu	November 20, 2024
Mayowa Amosu	November 20, 2024
Mbrown7983@gmail.com	November 19, 2024
Mcclainge	October 31, 2024
Megan Plummer	August 16, 2024
Meghan McCleary	October 31, 2024
Mel Laskowski	October 29, 2025
Melanie Johnson	November 18, 2024
Melanie Miles	November 1, 2024
Melanie Weldon-Soiset	November 12, 2024
Melvin Baum	November 13, 2024
Meredith Prescott	October 30, 2024
Merwyn De Mello	November 18, 2024
Mhawla92@gmail.com	November 4, 2024
Micaelajwu@gmail.com	November 12, 2024
Michael Bucci	November 19, 2024
Michael Cleary	November 13, 2024
Michael Frucht	November 25, 2024
Michael Levinstein	November 5, 2024
Michael Marmol	November 4, 2024
Michael Steffes	November 20, 2024
Mikayla Chua	October 31, 2024
Mike Dill	October 29, 2024
Mimi Sanford	November 18, 2024
Molly Brune	November 20, 2024
Moosebetty8@gmail.com	November 19, 2024
Morgan Corey	November 18, 2024
Morgan Leigh	November 19, 2024
Morgan Thapa	November 19, 2024
Moshe Pasternak	August 13, 2024
Mstonemolloy@gmail.com	November 20, 2024
Mstonemolloy@gmail.com	November 20, 2024
Mustafa Abdullah	November 19, 2024
Nanci Wilkinson	November 20, 2024
Nancy Birdsall	November 18, 2024
Nancy Hacker	November 20, 2024
Nancy Hacker	November 20, 2024
Natasha Usinger	November 19, 2024
Nathan Ashby	November 18, 2024
Nathan Harrington	November 13, 2024
Nathaniel Gillespie	November 13, 2024
Nethra P	October 31, 2024
Neville Williams	November 18, 2024

Nicholas Smaldone	November 18, 2024
Nick Stabile	November 8, 2024
Nicole Abrol	November 20, 2024
Nicole Gray	November 18, 2024
Nicole Rapfogel	November 19, 2024
Nidhi Mandadi	November 18, 2024
Nmgray521@gmail.com	November 8, 2024
Noam Stopack	November 13, 2024
Noam Stopak	October 29, 2025
Noam Stopak	October 28, 2024
Nolan Leavitt	November 12, 2024
Norman Koerner	November 20, 2024
Norman Koerner	November 20, 2024
Olabimpe Amokomowo	November 18, 2024
Olabimpe Amokomowo	November 18, 2024
Olivia Sage	November 18, 2024
Olivia Wallick	November 18, 2024
Oscar Gillette	November 8, 2024
Pamela Parks	November 4, 2024
Pamela Winston	November 19, 2024
Pamina Mejia	October 30, 2024
Patrice Kopistansky	November 19, 2024
Paul Ramshaw	November 20, 2024
Paul Shumaker	October 28, 2024
Paula Hirschhoff	October 30, 2025
Paula Hirschhoff	August 12, 2024
Paula Hirschhoff	November 4, 2024
Paulinaschwartz88@gmail.com	November 20, 2024
Persichetti77@gmail.com	November 20, 2024
Peter Hansen	November 13, 2024
Peter Martin	November 19, 2024
Peter Quinn-Jacobs	November 13, 2024
Peter Weiss	October 30, 2024
Phedra Benoit	November 18, 2024
Phil@backbonecampaign.org	November 20, 2024
Philip Downey	November 18, 2024
Philip Grinsted	November 20, 2024
Philip Grinsted	November 20, 2024
Platinumlimes@gmail.com	November 19, 2024
Pranay Somayajula	November 22, 2024
president@younggiftedgreen.org	November 20, 2024
Prianca Reddi	November 20, 2024
Prianca Reddi	November 20, 2024
Quinn Heinrich	November 12, 2024
R Lewis	November 20, 2024
Rachael Schultz	August 22, 2024
Rachel Geddes	November 18, 2024
Rachel Gorlin	November 13, 2024
Rachel Myers	November 15, 2024

Rachel S	October 29, 2025
Raquel Dominguez	November 18, 2024
Rblakerich@gmail.com	November 19, 2024
Rebecca Fritz	November 21, 2024
Rebecca Lipstein	November 20, 2024
Rebekah Grafton	November 8, 2024
Reilly Polka	November 19, 2024
Rhea Mehta	November 18, 2024
Ricardo Sheler	October 30, 2024
Richard Kite	October 25, 2024
Richard Miller	November 15, 2024
Richard Miller	August 13, 2024
Richard Vilmenay	November 18, 2024
Riley Hutchings	November 20, 2024
Riley Hutchings	November 20, 2024
Riley Reed	November 18, 2024
Rita Collins	October 31, 2024
Rita Collins	October 28, 2024
Rita Collins	October 28, 2025
Robert Pierno	October 31, 2024
Robin Diener	November 21, 2024
Romita Biswas	October 30, 2024
Rosalina Olivieri	November 18, 2024
Rose 1	November 26, 2024
Rose Schneider	November 20, 2024
Rose Ying	November 18, 2024
Ruth von Fleckenstein	November 13, 2024
rwcyrus3@gmail.com	November 20, 2024
Ryan Burgess	August 21, 2024
Ryan Manning	November 18, 2024
Ryan Sandford	November 20, 2024
Saanya Jain	November 22, 2024
Sally Winthrop	November 13, 2024
Sam Elghanayan	November 20, 2024
Sam Rose	November 18, 2024
Samantha Lee	November 19, 2024
Samir Battou	November 20, 2024
Samuel Bonar	November 19, 2024
Samuel Heuer	November 18, 2024
Samuel Pak	November 1, 2024
Sandra Reischel	November 18, 2024
Sandra Reischel	October 31, 2024
Sandra Roberts	November 8, 2024
Sandy Kanowicz	November 13, 2024
Sara Katz	November 20, 2024
Sarah Gubits	November 19, 2024
Sarah Lewand	November 18, 2024
Sarah Msenski	August 9, 2024
Sarah Osborn	November 12, 2024

Sarah Splitt	November 18, 2024
Sasha Tidwell	November 12, 2024
Savannah Araya	November 15, 2024
Scarlett Ford	December 3, 2024
Selah Goodson Bell	October 25, 2024
Serena Baserman	November 20, 2024
Sergio Baptista	November 18, 2024
Shani Mitchell	December 2, 2024
Shannon Turner	November 20, 2024
Shawn Brown	November 18, 2024
Shayna Gleason	November 18, 2024
Shayna Gleason	November 4, 2024
Shelagh Bocoum	November 19, 2024
Shelbie Elliott	October 25, 2024
Shelby Tuseth	November 20, 2024
Shelley Martin	October 28, 2025
Shelley Martin	November 20, 2024
Shelley Vinyard	November 18, 2024
Sidney Bronaugh	October 30, 2025
Silvana Zelmanovich	December 10, 2024
Simsamsomred@gmail.com	November 18, 2024
Sofia Doroshenko	November 18, 2024
Sofia Nazeer	November 18, 2024
Sonja Favaloro	November 18, 2024
Sonya Mital	August 20, 2024
Sophia Chan	November 18, 2024
Stacey R	November 13, 2024
Stacy Walker	November 18, 2024
Stefanie Sofia Salazar	November 19, 2024
Stephanie Minnock	October 31, 2024
Stephanie Scholz	November 14, 2024
Stephanie Segal	April 17, 2025
Stephanie Vo	February 13, 2025
Steven HI	November 18, 2024
Steven Seelig	November 18, 2024
Sujata Rajpurohit	November 18, 2024
Sumner Byrne	August 21, 2024
Susan Barnett	November 18, 2024
Susan Schorr	November 13, 2024
Suzanne DeFelice	November 15, 2024
Sydney Bronaugh	January 9, 2025
Sydney Bronaugh	November 13, 2024
Sydney Larrier	November 20, 2024
Syra De	October 30, 2024
Syra De	October 1, 2025
Tamara Travis	November 13, 2024
Tarcy Lu	November 19, 2024
Teresa Bohan	November 4, 2024
Terri B. Chapman	November 20, 2024

Terri.b.chapman@gmail.com	November 20, 2024
Thornerankin@gmail.com	November 19, 2024
Thrisha Mohan	November 18, 2024
Tiffanyrandall65@rocketmail.com	November 18, 2024
Tina Bardot	February 18, 2025
Tom McBrien	November 19, 2024
Tom Quinn	November 26, 2025
Tom Quinn	November 5, 2024
Tom Quinn	November 18, 2024
Tony Fullerton	November 18, 2024
Tony Inhorn	November 20, 2024
Travis McIntyre	November 1, 2024
Trey Sherard	November 4, 2024
Valeria Linares	October 30, 2024
Vasily Kisunko	November 20, 2024
Vasily Kisunko	November 20, 2024
Velga Brolis	November 4, 2024
Victor Ke	November 6, 2025
Victor Ke	October 30, 2024
Victoria Garrison	October 30, 2025
Vince Lampone	October 25, 2024
Walter Khushrenada	October 31, 2024
Walter Tersch	June 30, 2025
Waltoneric@pm.me	November 8, 2024
Warren James	November 18, 2024
Wendy Cronin	November 19, 2024
Wes Hoar	November 18, 2024
Whitlock	October 28, 2024
Will Morrison	November 19, 2024
William Morrison	November 20, 2024
Yoimel Gonzalez	November 18, 2024
Zachary Schaufler	October 25, 2024
Zachary Whitlock	November 8, 2024
Zander Pellegrino	October 27, 2025
Zane Curtis-Thomas	November 18, 2024

ATTACHMENT B: COMMUNITY COMMENTS IN SUPPORT OF DISTRICT SAFE

Name	Date
Aaron Johnson	November 12, 2024
Abraham Hagos	November 18, 2024
Abraham T Hagos	October 22, 2024
Afg Afc	October 24, 2024
Alan Alper	November 18, 2024
Albert Wheeler	November 21, 2024
Alfred Arocho	November 15, 2024
Alice Watson	October 21, 2024
Alquan Harrison	November 07, 2024
Alvin Gaskins	November 20, 2024
Amy Hubbard	November 18, 2024
ANC 3A	November 20, 2024
Andra Henderson	November 21, 2024
Andre Foster	November 20, 2024
Angela Gross	November 18, 2024
Anna Howard	November 18, 2024
AnneMarie Lerate	November 18, 2024
Annie Peake	October 22, 2024
Annie Tyson	October 21, 2024
Annie Tyson	November 15, 2024
Annie Whatley	October 24, 2024
Anthony Baliey	November 19, 2024
Anthony Bernier	November 20, 2024
Anthony Burns	November 20, 2024
Anthony Connelly	November 18, 2024
Anthony Dale	October 24, 2024
Anthony Mcgill	November 20, 2024
Anthony Murray	November 08, 2024
Anthony Northern	November 15, 2024
Anthony Shaw	November 19, 2024
Antoine Roberts	November 20, 2024
Antonio Boyd	November 08, 2024
Antonio Lawson	November 18, 2024
Antonio Proctor	November 08, 2024
Ariel Doblado	November 20, 2024
Arnoldo Chandler	November 20, 2024
Arrid Richardson	November 20, 2024
Arthur Smith	November 07, 2024
Arthur Stubbs	November 18, 2024
Audrey Dodd	November 21, 2024
Audrey Dodd	October 21, 2024
Aundria Dicks	November 20, 2024
Barbara Barnes	November 19, 2024
Barbara Boswell	November 20, 2024

Barbara Clark	November 20, 2024
Barbara Cook	November 20, 2024
Basavaraj Hooli	November 20, 2024
Beatriz MartInez	November 08, 2024
Bede Lopez	October 21, 2024
Benjamin Smalls	November 12, 2024
Bernice Young	October 24, 2024
Betsy Goergen	October 18, 2024
Betty Brown	November 14, 2024
Betty Kates	November 20, 2024
Betty Smith	October 22, 2024
Betty Smith	November 20, 2024
Betty Williams	November 20, 2024
Beverly Hawkins	November 21, 2024
Beverly Turner	November 21, 2024
Bilal Steward-Bey	November 12, 2024
Billie Gardner	October 24, 2024
Billie Newnam	November 20, 2024
Bishop Booker	November 20, 2024
Blanche Chatman	November 20, 2024
Bobby Dixon	November 20, 2024
Brandon Tristan Todd	October 24, 2024
Brenda Brown	November 19, 2024
Brenda Dew	November 20, 2024
Brenda Edwards	November 21, 2024
Brenda Johnson	November 20, 2024
Brenda Queen	November 20, 2024
Brenda Tyer	November 20, 2024
Brian Brown	November 20, 2024
Brian Richard	November 19, 2024
Brian Stickell	November 20, 2024
Brianna Fuller	November 15, 2024
Bryon Yeager	October 21, 2024
Caelus Heavens	November 07, 2024
Carl Payton	November 14, 2024
Carlton Samuels	October 17, 2024
Carol Spring	November 20, 2024
Carolyn Wilson	November 18, 2024
Cassandra Barber	November 19, 2024
Catherine Ashton	November 20, 2024
Catherine Francis	November 21, 2024
Cathy Vlasak	November 18, 2024
Catina Hardy	October 22, 2024
Catina Hardy	November 20, 2024
Cedric Nouketcha	November 18, 2024
Charisma Charisma-Gilstrap	November 20, 2024
Charles Crawford	November 21, 2024
Charles Edward Bailey Jr	October 24, 2024
Charlette Clayton	November 21, 2024

Charlotte Cox	October 22, 2024
Charlotte Cox	October 21, 2024
Charmaine Frazier	November 19, 2024
Che Ruddell-Tabisola	October 24, 2024
Cherita Whiting	October 24, 2024
Chero Keeknight	November 20, 2024
Cheryl Jackson	November 15, 2024
Cheryl Richardson	November 20, 2024
Cheryl Tennille	November 20, 2024
Chioma Igbonekwu	November 18, 2024
Chris Seabolt	November 15, 2024
Chris Shanholtzer	November 20, 2024
Christina Northern	November 20, 2024
Christina Northern	October 22, 2024
Christopher Beckwith	November 20, 2024
Christopher Robins	November 20, 2024
Christopher Younger	November 21, 2024
Cindy Smith	November 21, 2024
Claire Mills	November 21, 2024
Claretha Basil	October 18, 2024
Clarissa Mays	November 18, 2024
Claudia McKoin	October 24, 2024
Clayrine Kelley	November 12, 2024
Clifton Gullet	November 20, 2024
Clifton Simmons	November 18, 2024
Conchita Wilson	October 24, 2024
Connie Britt	November 18, 2024
Connie Britt	October 18, 2024
Connie Harvard	November 20, 2024
Connie Thurston	November 18, 2024
Contillion Rucker	November 07, 2024
Cordelia Phillips	November 18, 2024
Corry Brown	November 18, 2024
Costello Watson	November 20, 2024
Cullen Gilchrist	October 24, 2024
Curtis Gregory	November 07, 2024
Cynthia Etohfinn	October 21, 2024
Cynthia Grant	October 24, 2024
Cynthia Grant	November 20, 2024
Cynthia Grant	October 18, 2024
Cynthia McCleary	October 22, 2024
Cynthia Parker	October 21, 2024
Cynthia Parker	November 20, 2024
Cynthia Williams	November 20, 2024
Dajohn Bell	November 18, 2024
Dale Stevens	November 21, 2024
Dame Diaw	November 21, 2024
Daminique Branch	October 24, 2024
Danita Chase	November 21, 2024

Darell-c Fitzsimmonss	November 19, 2024
Darnell Perkins	October 24, 2024
Darnice Richmond	November 07, 2024
Darryl Downtin	November 19, 2024
Darryl Williams	October 24, 2024
David Carlson	October 24, 2024
David David	November 19, 2024
Dawit Ghebresellasi	November 20, 2024
Deborah A Carethers	October 22, 2024
Deborah Dubose	November 08, 2024
Deborah Lovelace	November 20, 2024
Deborah Pyos	November 19, 2024
Debra Bottomley	November 19, 2024
Della Martin	November 20, 2024
Delores Holmes	November 20, 2024
Delores Junious	November 07, 2024
Demarco Wright	October 18, 2024
Demetrice Miller	November 18, 2024
Denise Dorsey	November 20, 2024
Denise Gorham	November 20, 2024
Denise Jackson	November 19, 2024
Denise Taylor	November 18, 2024
DeniseMember Gaffney	November 20, 2024
Denita Simms	November 20, 2024
Dennis Harrell	October 24, 2024
Dennis Vicari	November 20, 2024
Deone Brown	November 20, 2024
Der Smith	October 18, 2024
Deron Mack	November 20, 2024
Desire Johnson	October 22, 2024
Dev Saman	November 21, 2024
Devaughn Kates	November 18, 2024
Diana Stiebens	November 07, 2024
Diane Diggs	October 24, 2024
Diane Lucas	October 22, 2024
Dinora Cornejo	November 19, 2024
Dominador Aquino	November 19, 2024
Don Davis	November 20, 2024
Donald Capehart	November 20, 2024
Donald Reed	November 20, 2024
Donell Hutchinson	October 17, 2024
Donna Jackson	November 20, 2024
Donte Hodge	November 20, 2024
Dorian McNeill-Gregory	November 18, 2024
Doris Dixon	October 21, 2024
Doris Simpson	November 21, 2024
Dwayne Johnson	November 18, 2024
Dwayne Thompson	November 20, 2024
Dwight Mayo	November 18, 2024

Earl Bedney	November 18, 2024
Eboni Jackson	October 18, 2024
Eboni Jackson	November 20, 2024
Edmond Scott	November 18, 2024
Edris Shepherd	November 12, 2024
Edward Clarke	November 20, 2024
Edward Frank	November 20, 2024
Edward Luna	November 19, 2024
Edward Powell	November 20, 2024
Eileen Reed	October 25, 2024
Eileen Reed	October 22, 2024
Eleanor Flowers	November 19, 2024
Elizabeth Nanton	October 22, 2024
Elizabeth Nanton	October 24, 2024
Ellenfb98@gmail.com	November 19, 2024
Emile Hayes	November 19, 2024
Emma Derr	October 22, 2024
Ernest Ingram	November 20, 2024
Ernest Thomas	November 20, 2024
Estella Brown	November 19, 2024
Eusebio Aguiar	November 18, 2024
Evalyn Garvin	November 18, 2024
Evan Johnson	October 25, 2024
Evelyn Showers	November 18, 2024
Evelyn Thompson	October 24, 2024
Felicia Gates	November 20, 2024
Flor Martinez	November 20, 2024
Florence Leary	November 21, 2024
Francisco Amaya	November 20, 2024
Francisco Reyes	November 20, 2024
Franklin Myers	November 18, 2024
Frederick Hollingsworth	November 18, 2024
Frederick Hubig	November 20, 2024
Frederick Smith	November 20, 2024
Fritz A Henn	October 24, 2024
Fritz Henn	November 18, 2024
Gale Thompson	November 20, 2024
Gay Hadad	November 20, 2024
Geno Jenkins	November 18, 2024
Gerardo-Isidro Galicia	November 18, 2024
Glendora Watkins	November 19, 2024
Glenna Lewis	November 20, 2024
Glennie Oneal	October 18, 2024
Gloria Long-Ball	November 20, 2024
Gloria Settles	November 18, 2024
Gretchen Megargel	November 20, 2024
Guadalupe Guzman	November 20, 2024
Gurney Dixon	November 19, 2024
Gwendolyn Allen-morton	November 20, 2024

Hannah L	November 20, 2024
Harriet Falls	November 20, 2024
Harrine Freeman	October 24, 2024
Harry Bissett	November 08, 2024
Hazel Peterson	October 17, 2024
Helen Stackhouse	October 24, 2024
Helen Stackhouse	November 15, 2024
Henrietta Schuller	November 20, 2024
Henry O'Neal IV	October 24, 2024
Henry Zissett	November 21, 2024
Herbert Montgomery	November 18, 2024
Herman Taylor	October 24, 2024
Hope Spracklin	November 18, 2024
Howard Lee	November 19, 2024
Hubron Blackwell	October 24, 2024
Hywanda Mock	November 19, 2024
Ibania Carbajal	November 20, 2024
Ivy Heward-Mills	November 21, 2024
Jacinta Green	November 07, 2024
Jacqueline Anderson	November 20, 2024
Jacqueline Estep	November 20, 2024
Jacqueline Franklin	November 18, 2024
Jacqueline Kelly	November 19, 2024
Jacqueline Leach	November 20, 2024
Jacqueline Tate	November 20, 2024
Jalen Bell	November 07, 2024
James Bennett	November 19, 2024
James Brown	October 18, 2024
James Callahan	November 18, 2024
James Dickey	November 18, 2024
James Gwin	November 20, 2024
James Morris	November 18, 2024
James Smith	November 20, 2024
James Thomas	November 18, 2024
James Young	November 20, 2024
Janaina Dopazo	October 24, 2024
Jane Hogge	November 20, 2024
Janet Harvey	November 12, 2024
Janet Johnson	October 22, 2024
Janita Cunningham	November 19, 2024
Jannah Mujaahid	November 20, 2024
Jasmine Riley	October 24, 2024
Jasmine Sturgess	November 15, 2024
Jason Joyner	November 20, 2024
Jay HarrisonHay	November 18, 2024
Jean Williams	November 18, 2024
Jeanette Smith	October 22, 2024
Jeffery Bowser	November 20, 2024
Jeffrey Jeffrey	November 14, 2024

Jena Mackall	November 20, 2024
Jennifer Cummings	October 21, 2024
Jennifer Rogers	October 24, 2024
Jennifer Smith	November 15, 2024
Jenny Werwa	October 22, 2024
Jerome Lester Jr.	November 19, 2024
Jerry Crayton	November 20, 2024
Jerry Watts	October 18, 2024
Jessica Howard	November 20, 2024
Jevoner More	November 20, 2024
Joan Bleasdille	November 18, 2024
Joe Welsh	November 21, 2024
John Cregar	November 19, 2024
John Rosario	November 20, 2024
John Shotwell	November 20, 2024
John Smith	November 15, 2024
Johnson Gurganus	November 15, 2024
Jose Vazquez	November 12, 2024
Joseph Carter	November 20, 2024
Joseph Reeder	November 20, 2024
Joseph Wilkins	November 20, 2024
Josephine Williams	November 20, 2024
Joshua Johnson	November 20, 2024
Joshua Johnson	November 20, 2024
Joy Bowden	November 18, 2024
Joyce Washington	October 18, 2024
Judith Collister	October 18, 2024
Judy Moody	November 19, 2024
Julia Benjamin	November 20, 2024
Julia Leigh	November 21, 2024
Junious Mabrey	November 20, 2024
Kai Fox	October 22, 2024
Karen Chaffin	November 19, 2024
Karen Manigo	November 20, 2024
Karen Wagner	November 18, 2024
Karla Mcilwain	October 18, 2024
Katrina Ball	October 25, 2024
Katrina Ball	November 19, 2024
Kay Gay-Maison	November 20, 2024
Kay Gay-Maison	October 22, 2024
Kaye Lawton	November 12, 2024
Kayla Williams	November 20, 2024
Keister Gallman	November 18, 2024
Keith Harper	November 19, 2024
Keith Washington	November 20, 2024
Kellie Lowry	November 07, 2024
Kemal Geleto	October 21, 2024
Kenneth Brewer	October 22, 2024
Kenneth Brewer	November 20, 2024

Kenneth Brewer	October 24, 2024
Kenneth Milam	October 25, 2024
Kenneth Robinson	November 20, 2024
Kerima Usman	November 19, 2024
Kevin Leonard	November 21, 2024
Kevin Rush	November 20, 2024
Khaliya Jones	November 20, 2024
Khia Williams	November 19, 2024
Kiiara Mundaray	November 18, 2024
Kim Baker	November 20, 2024
Kim Holland	November 18, 2024
Kimberly Castle	November 19, 2024
Kimberly Christmastrent	October 18, 2024
Kimberly Jackson	October 22, 2024
Kimberly Thomas	November 08, 2024
Kimberly Wise	November 20, 2024
Kinnicia Williams	November 15, 2024
Kolapo Olaleye	November 12, 2024
Kristen Brement	November 19, 2024
Kristopher Childers	November 19, 2024
Kurtis Brooks	November 20, 2024
Kyle Cooke	October 24, 2024
Lakeiza Garnett	October 22, 2024
laneill Rose-Wells	November 18, 2024
Laren Freemsn	October 18, 2024
Larnetta Smith	November 18, 2024
Latanya Jackson	November 20, 2024
Laurelmaclaren@gmail.com	November 19, 2024
Laurie Chatman	November 12, 2024
LaVerne Evans	November 20, 2024
Laverne Hazley	October 25, 2024
Leonard Pace	November 18, 2024
Lerolyn Adams	October 22, 2024
Lidia Innella	November 20, 2024
Linda Proctor	November 18, 2024
Linda Robinson	November 20, 2024
Linda Washington-Weaver	November 20, 2024
Lisa Brittingham	November 19, 2024
Lisa Gantt	November 14, 2024
Lisa White	November 19, 2024
Lolita Horne	November 20, 2024
Lorenzo Smith	November 12, 2024
Loretta Littles	October 18, 2024
Loretta Smith	November 20, 2024
Loretta Smith	October 17, 2024
Loretta Smith	October 24, 2024
Lorraine Bouknight	November 19, 2024
Lowell Long	November 18, 2024
Lucas Hinds	October 18, 2024

Lyn Williams	November 19, 2024
Mabel-L Harris	November 20, 2024
Mack Jacobs	November 19, 2024
Mandy Hinkle	November 20, 2024
Manny Geraldo	October 24, 2024
Marcus Banks	November 18, 2024
Margaret Brown	November 20, 2024
Margaret Howard	October 22, 2024
Margaret McClain	October 21, 2024
Margaret Simmons	November 19, 2024
Margo Price	November 18, 2024
Maria Bennaugh	November 19, 2024
Maria Bennaugh	October 22, 2024
Maria Hernandez	November 20, 2024
Maria Longo	November 20, 2024
Maria Peace	October 24, 2024
Marie Bates	November 20, 2024
Marilyn Hawkins	November 20, 2024
Mark Deloach	November 07, 2024
Mark Missouri	October 21, 2024
Mark Wilson	November 20, 2024
Mark-Antony Missouri	November 20, 2024
Marlon Mccatty	November 20, 2024
Marsha Quander	October 25, 2024
Martin Baldwin	November 12, 2024
Marvin Johnson	October 25, 2024
Marvin Johnson	November 07, 2024
Marvin Watkins	November 19, 2024
Mary Coffey	November 20, 2024
Mary King	November 21, 2024
Mary Monk	November 20, 2024
Mary Peake	November 20, 2024
Marylee Jones	October 25, 2024
Marylee Rodgers	November 19, 2024
Matilde Chub	November 20, 2024
Max Broad	November 12, 2024
Meera Gokool	November 19, 2024
Melinda Boyd	November 19, 2024
Melvin Pricehance	November 21, 2024
Member Dougherty	November 19, 2024
Member Michael Hall	November 19, 2024
Merrill Tasker	November 18, 2024
Michael Bonner	November 20, 2024
Michael Bradley Sr.	November 15, 2024
Michael Brandon	November 07, 2024
Michael Clayton	November 19, 2024
Michael Hampton	November 20, 2024
Michael Jackson	October 17, 2024
Michael Peoples	November 20, 2024

Michael Thurston	October 18, 2024
Michelle Harris	November 08, 2024
Michelle Hatfield	November 21, 2024
Michelle Johnson	October 22, 2024
Michelle White	October 21, 2024
Miguel Pujols	November 21, 2024
Mildred Ruscito	October 22, 2024
Mildred Taylor	November 20, 2024
Mini Black	November 21, 2024
Miriamyoung78@gmail.com	November 19, 2024
Mitchell Mitchell	November 18, 2024
Mohamed Sesay	October 21, 2024
Monora Veney	November 20, 2024
Monte Monash	October 24, 2024
Montez Anderson	October 24, 2024
Mr. James Hawkins	October 24, 2024
Mr. Justin Harrison	October 24, 2024
Mr. Ronald H. Newman	October 24, 2024
Mrs Kristen Stewart Sr	October 18, 2024
Mrs. Catherine Y Walker	October 22, 2024
Mrs. Gabriela Linares	October 22, 2024
Mrs. Karen Todd	October 22, 2024
Ms. Alyssa Murphy	October 22, 2024
Ms. Beatrice Davis-Williams	October 24, 2024
Ms. Delicia Gunn	October 24, 2024
Ms. Dianna Waters	October 24, 2024
Ms. Jennifer Stettner	October 22, 2024
Ms. Karen Todd	October 24, 2024
Ms. Lauren Brown	October 22, 2024
Ms. Monica West	October 22, 2024
Ms. Stacy Burnette	October 24, 2024
Muslimah Shaffi	October 21, 2024
Nancy Connolly	November 19, 2024
Nancy Jones	November 18, 2024
Nataki Hines	October 24, 2024
Nathan Dean	November 18, 2024
Nathaniel Titus	October 21, 2024
Nema Wilhite	November 07, 2024
Nevaeh Jones	October 21, 2024
Nichco Taliaferro	November 20, 2024
Nicole Nabinett	November 08, 2024
Nicole Parks	November 20, 2024
Nina Macauley	November 20, 2024
Noliwe Gofhamodimo	October 22, 2024
Noliwe Gofhamodimo	October 24, 2024
Noliwe Gofhamodimo	November 20, 2024
Noreen Lyday	November 21, 2024
Norman Clark	November 20, 2024
Novella Stevens	November 21, 2024

Octavia Venable	November 20, 2024
Olice Barnes	November 19, 2024
Oliver Adams	November 20, 2024
Omar Gilliam	November 18, 2024
Orlando Boone	November 21, 2024
Oscar Ardon	November 12, 2024
Padma Vangipuram	November 18, 2024
Pamela Flowers	November 18, 2024
Pamela-L Spivey	November 07, 2024
Patrice Hamm	November 20, 2024
Patrice Marshall	November 20, 2024
Patricia Avants	November 20, 2024
Patricia Jones	October 24, 2024
Patricia S Blakely	October 22, 2024
Patricia Williams	October 18, 2024
Patricia Younger	November 15, 2024
Patsy Ruckle	November 18, 2024
Paul Brown	November 20, 2024
Paul Brown	October 17, 2024
Paul Monro	November 20, 2024
Paulette Hampton	November 12, 2024
Pauline Nelson	November 18, 2024
Penelope Fox	October 22, 2024
Penelope Fox	October 24, 2024
Penelope Fox	November 19, 2024
Penny Luevano	November 20, 2024
Perry Click	November 20, 2024
Phillip Bennett	November 20, 2024
Pinto Gomes	November 20, 2024
Priscilla Taylor	November 18, 2024
Quinton Whack	November 18, 2024
Rainia Mcwhirter	November 07, 2024
Rajuawn Middleton	November 20, 2024
Randall Grayson	November 18, 2024
Randy Barron	November 18, 2024
Rebecca Christopher	October 24, 2024
Rebecca Christopher	October 22, 2024
Rebecca Reagan	November 19, 2024
Reggie Cunningham	November 20, 2024
Reggie Wallace	November 20, 2024
Reginald Meeler	November 20, 2024
Renee Gladden	November 19, 2024
Renee Johnson	November 18, 2024
Renee Smith	October 21, 2024
Rhonda Lawson	November 08, 2024
Rhonda Luck	November 19, 2024
Rhondelle Lincoln	November 20, 2024
Ricardo Romero	November 20, 2024
Richard Basch	November 14, 2024

Richard Meyer	October 24, 2024
Richard Underwood	October 18, 2024
Richard Wiggins	November 08, 2024
Robert Brown	November 12, 2024
Robert Engram-Jr	November 19, 2024
Robert Jackson	November 21, 2024
Roderick Campbell	November 18, 2024
Rodney Kennedy	November 18, 2024
Rodney Mack	November 20, 2024
Roger Washington-Jr	November 07, 2024
Rohan Morgan	November 20, 2024
Ronald Barnes	November 18, 2024
Ronald Smith	October 22, 2024
Ronald Stover	November 18, 2024
Ronald Walker-SR	November 19, 2024
Rosemary Johnson	November 18, 2024
Rosemary Woodruff	October 25, 2024
Rosetta Marie-Archie	November 08, 2024
Roy Davis	November 15, 2024
Rudnita Johnson	October 25, 2024
Rudolph Morgan	November 20, 2024
Rut Patel	November 19, 2024
Sabitha Fantroy	November 18, 2024
Sabrina Mulconrey	November 21, 2024
Sadie Purnell	November 20, 2024
Sandra Fitzhugh	November 19, 2024
Sandra Fitzhugh	October 22, 2024
Sandra Fitzhugh	November 20, 2024
Sandra Fitzhugh	October 24, 2024
Sandras Cox	November 08, 2024
Sarah Wilson	October 25, 2024
Sasha Williams	November 21, 2024
Saunda Lanier	November 21, 2024
Saundra Ware	November 15, 2024
Savannah Neighbors	November 20, 2024
Saxaline Boots	October 22, 2024
Sean Pratt	November 20, 2024
Sean Price	November 21, 2024
Seaney Halliday	November 20, 2024
Sebastian Billingslea	November 19, 2024
Semaj Herndon	November 20, 2024
Shannon Smith	November 20, 2024
Sharmaine Lewis Hardy	November 21, 2024
Sharnette Houston	October 24, 2024
Sharon Meyers	November 19, 2024
Sharon Oxendine	November 19, 2024
Sharon Vest	November 12, 2024
Sharon-R Brown-Dorsey	November 08, 2024
Sheila Jones	November 18, 2024

Sheila Wallace	November 18, 2024
Shelley Waring	November 12, 2024
Shelly Coker-Dixon	November 21, 2024
Sheri Matusko	October 22, 2024
Sheron Woods	November 20, 2024
Shirin Saleh	November 19, 2024
Shirlette Smothers	November 18, 2024
Shirlmeika Phillips	November 20, 2024
Sigifredo Sigifredo	November 20, 2024
Silvestres Sanchez	November 19, 2024
Sonja Moore	November 20, 2024
Starlett Dixon	October 21, 2024
Stavita Jackson	November 19, 2024
Steven Belzer	November 19, 2024
Steven Sachs	October 22, 2024
Susan Lorraine Jones	November 20, 2024
Sylvania BathanasCook	October 22, 2024
Tamesia Russel	November 20, 2024
Tammy Davis	November 15, 2024
Tandra Belzer	October 22, 2024
Tanika Wynn	November 20, 2024
Tara Lancaster	November 20, 2024
Tara Phillips	November 18, 2024
Tayja Brown	November 20, 2024
Tee Moes	November 20, 2024
Teresa Dunlap	October 18, 2024
Terese-M Smith	November 18, 2024
Terri Smith	November 20, 2024
Terry McLean	November 18, 2024
Tesfamariam Mebrahtu	October 25, 2024
Thaddeus Vines	November 21, 2024
Thelma Barnes	November 21, 2024
Thelma Duggin	November 20, 2024
Thelton Smith	November 21, 2024
Theodore Anderson	November 15, 2024
Theresa Bell	November 07, 2024
Theresa Brown	November 18, 2024
Theresa Gallimore	October 18, 2024
Theresa Gallimore	November 12, 2024
Thomas Bittle-Jr	November 20, 2024
Thomas Carpenter	November 18, 2024
Thomas McBride	November 19, 2024
Thomas Rogers	November 21, 2024
Thomas Williams	November 18, 2024
Tijuana Whipple	November 20, 2024
Tim Kraus	November 07, 2024
Timothy Dozier	November 20, 2024
Timothy Olabiyi	October 24, 2024
Timothy Timothy	November 21, 2024

Toney Campbell	November 19, 2024
Tony Williams	November 19, 2024
Tonya Fisher	November 20, 2024
Towanda Watts	November 20, 2024
Traci Lively	November 20, 2024
Traci Pratt	November 18, 2024
Trevor Pusey	October 25, 2024
Troy Price	November 19, 2024
Tuschia Ashe	November 20, 2024
Tyrone Wiggins	November 18, 2024
Valencia Foster-El	November 20, 2024
Valerie Godbolt	November 20, 2024
Valerie Jordan	October 22, 2024
Vanissa Varone	November 20, 2024
Venise Jackson	November 19, 2024
Venus Serlement	November 20, 2024
Vera Jackson	October 22, 2024
Veronica Cartier	October 18, 2024
Vincent Scott	November 18, 2024
Vivian Rascoe	November 15, 2024
Wanda Beverly	November 20, 2024
Wanda Gunning	November 19, 2024
Wanda Locust	November 15, 2024
Wesley Dozier	October 24, 2024
Wilbert-J Drew	November 20, 2024
William Bell	November 18, 2024
William Brewer	November 19, 2024
William Brown	November 07, 2024
William Camp	November 19, 2024
William Johnson	November 07, 2024
William Simmons	November 12, 2024
William Toogood	November 20, 2024
Willie Jennings	November 20, 2024
Willie Taylor	November 18, 2024
Xenia Aguilar	November 20, 2024
Yana Hamilton	November 07, 2024
Yolanda Johnson	November 19, 2024
Zaccaria Diarra	November 19, 2024
Zachary Scott	November 20, 2024
Zamari Taylor	November 20, 2024
Zenaida Andaya	November 18, 2024
Zenebework Negash	November 20, 2024
Zenora Sears	November 19, 2024

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

March 4, 2026

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

DISSENT OF COMMISSIONER BEVERLY TO ORDER NO. 22798

1. I have had serious concerns with this program from the beginning, due to the threadbare nature of WGL's application, including the failure of the Company to comply with Order No. 22003, and the Company's prior performance on cost, timeline, and leak detection. Regarding whether WGL's Application complied with Order No. 22003, I provided an in-depth analysis appended to my dissent to Order No. 22367 detailing WGL's noncompliance,⁴³⁷ which I will not repeat here. The majority, in this Order, "has reviewed and evaluated the evidentiary record and finds, for the reasons noted herein, that WGL's District SAFE Plan complies with Order No. 22003. Throughout the discovery process, WGL provided updated information as directed by the Commission."⁴³⁸ This last sentence implies that WGL complied with all the directives in the Order (which I disagree with) but implicitly concedes the opposite by giving the Company 30 additional days to provide information regarding the decommissioning of mains that it should have already provided in response to the original directive, even after program approval.⁴³⁹ Giving the Company an additional opportunity to provide this information after approval of the program, deprives the nonutility parties of a meaningful opportunity to challenge the information and is, to me, unduly prejudicial.

2. With regard to the broader issue of the usefulness of the program, I continue to oppose accelerated recovery for pipe replacement for WGL. This process has become an exercise

⁴³⁷ Dissent of Commissioner Beverly to Order No. 22367, rel. February 19, 2025.
<https://edocket.dcpsec.org/apis/api/Filing/download?attachId=218605&guidFileName=a901efa4-0d3d-4c42-8f57-a1fd650c40b2.pdf>

⁴³⁸ ¶ 114

⁴³⁹ ¶ 118: "The Commission recognizes, as DCG noted, 15 miles of cast-iron mains for potential abandonment were identified by WGL, but the Company has not provided specifics for decommissioning the mains. Therefore, we are directing WGL to provide an update including detailed information regarding the proposed abandonment projects within 30 days of the date of this Order."

where the Commission “shoots first and aims later.” Specifically, the Commission is approving accelerated funding for WGL first, and determining workplans and project lists second. The result of that approach is that we spend lots of money with very little to show for it, especially as compared to other states. Which brings me to JANA.

3. The majority has approved the use of JANA to calculate risk reduction per dollar spent for pipeline replacement projects. However, the Company has admitted that it has calibrated JANA to focus on investor risk, rather than the health, safety, and environmental risk to the District and its residents and businesses.⁴⁴⁰ To be in the public interest, as opposed to just WGL’s interest, I think that WGL should be required to develop a risk framework based on: leakage rate, location, type, grade, and flow rate; material condition; age; nearby building type; air pollutants; and GHG emissions while excluding, or at least minimizing, investor risk. After approving the Company’s risk methodology, the Commission should then require the Company to provide lists of pipe risks and rankings before approving any projects that will be paid for by ratepayers (whether through accelerated recovery, a traditional rate case, or something else).

4. While WGL’s actions have often implicitly conflated “normal” and “accelerated” replacement, this Order seems to combine normal and accelerated replacement together once and for all by stating: “To address the concerns regarding normal versus accelerated replacement work, the Commission hereby adopts a threshold-based requirement mechanism as a part of the Modified District SAFE Plan approval. The Commission sets an annual ‘threshold’ amount of \$10 million for Year 1 (22% of the Modified District SAFE Plan Year 1 budget), \$12.5 million for Year 2 (25% of the Modified District SAFE Plan Year 2 budget), and \$15 million for Year 3 (27.2% of the Modified District SAFE Plan Year 3 budget) of the Modified District SAFE Plan...Any pipeline replacement or similar infrastructure expenditures below the authorized annual threshold would be considered ‘normal’ activity, deferred and recorded in a specific District SAFE Plan Deferral Account for tracking purposes, and subject to typical rate case recovery similar to any other capital expenditure. If the Commission-authorized threshold has been met for a given year of the authorized three-year program, in replacements exceeding that threshold, that amount would be eligible for accelerated cost recovery through the Modified District SAFE Plan surcharge mechanism up to that year’s annual budget cap.”⁴⁴¹ The majority has made this normal/accelerated recovery subject to the rate of spending, rather than the rate of replacement. Therefore, to me, this appears to encourage WGL to run up the bill for pipe replacements as fast as possible in order to reach the surcharge-eligibility threshold.

⁴⁴⁰ DCG Brief at 24.

⁴⁴¹ ¶ 136

5. Similarly, this program still lacks any meaningful cost controls and fails to address that we have among the most expensive pipe replacement in the country. Instead, the majority commits to continuing to allow the Company to increase its pipeline replacement costs by up to 20% every two years, far outpacing the rate of inflation.⁴⁴² These costs are already unreasonably high, and to allow them to balloon further without additional scrutiny is a disservice to ratepayers. On top of that, the majority again promises that the Commission will undertake a prudency review: “The Commission expects that all District SAFE Plan expenditures, surcharge eligible spending or otherwise, will be rolled into WGL’s rate base during the next applicable rate case proceeding for the Commission’s consideration, and will be subject to a final prudency review.”⁴⁴³ However, the last rate case ignored the charge to undertake the prudency review and instead relied on a management audit (a decision from which I dissented). This Order doesn’t make clear whether the Commission intends to follow or deviate from what it did in the last rate case.

6. While I agree with the majority’s choice to bar abandonment-only projects from surcharge recovery, there is still the remaining issue of *any* removal costs being added to the surcharge and treated as new capital costs. No abandonment costs should be surcharge-eligible, even if those abandonments are part of a replacement project, since that effectively creates a new asset for costs that are already included in the rate base under the depreciation of the original asset. Instead, removal costs should be recorded separately and trued up against what ratepayers have already contributed through depreciation (net salvage). Due to this practice going on for so many years, I believe the Commission should also undertake an audit of all gas plant in service to ensure that abandonment costs are not being treated as assets and that removal costs have been appropriately recorded and netted.

7. When we turn to issues of alignment with the District’s climate goals, the Commission majority simply states that this program is aligned because it has the potential to avoid future leaks.⁴⁴⁴ This Order does not contain any estimate of reduced GHG emissions from the program. Therefore, I will assume the impact is zero tons of carbon dioxide equivalent. This is compounded by a lack of standardized leak survey calibration, which the DOEE asserts is causing a major undercounting of *existing* leaks. In my view, we should be prioritizing existing super-emitters and directing the Company to repair those, rather than giving the Company hundreds of

⁴⁴² ¶ 139: “WGL shall exclude any completed work that exceeds 120% of the rolling two-year annual average category (mains or services) from the surcharge or threshold cost recovery.”

⁴⁴³ ¶ 136

⁴⁴⁴ ¶ 151

millions of dollars to replace pipelines that may leak in the future.

8. Generally, I also think the Commission does not require sufficient reporting and documentation from the Company, which is an important consideration as the Commission moves to adopt an integrated planning exercise. Unless there is a compelling reason to do otherwise, I think the Commission should require JANA modeling outputs to be public, and require the Company to file pre-construction reports, post-construction reports, weekly construction updates, photographs and documentation of construction, permits, receipts, invoices, and timecards. Also, under the PIPES 1 settlement, parties were given three months to review the pipe lists. The timeframe for non-utility and Commission review should be at least three months, and deficient filings by the Company of any kind should be rejected with a requirement to re-file, instead of Staff and non-utility parties building out filings through discovery.

9. Ultimately, the majority's Order is approval of spending an additional \$150 million of ratepayer money without the approval of a single project. While I recognize and appreciate that the majority has attempted to add some guardrails to the Company's spending, this type of up-front approval has not worked in the past and functions more as a blank check to the Company with limited oversight. Therefore, I respectfully dissent.

COMMISSION ACTION

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

Date 3/4/26 Formal Case No. FC1179 Tariff No. _____ Order No. 22798

	Approve Initial & Date	Dissent Initial & Date	Abstain Initial & Date
Chairman Emile Thompson	<u>ET/DJ 3/4/26</u>	_____	_____
Commissioner Richard A. Beverly	_____	<u>RB/DJ 3/4/26</u>	_____
Commissioner Ted Trabue	<u>TT/DJ 3/4/26</u>	_____	_____

Certification of Action

Dionne Joemah
General/Deputy General Counsel

Kimberly Lincoln-Stewart
OGC Counsel/Staff