

January 24, 2020

VIA ELECTRONIC FILING

Udeozo Ogbue, P. Eng., DBM
Chief, Office of Compliance and Enforcement
Public Service Commission
of the District of Columbia
1325 "G" Street, N.W., 8th Floor
Washington, D.C. 20005

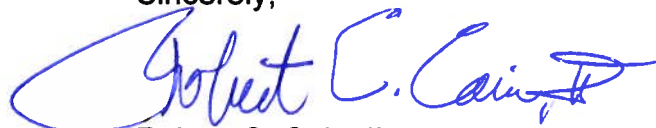
Re: **Washington Gas Light Company's Response to VIO 2019-37- G
through VIO 2019-40-G**

Dear Mr. Ogbue:

Pursuant to 15 DCMR §2312.2 Washington Gas Light Company ("Washington Gas" or "Company") hereby submits its Response to Notice of Probable Violations ("NOPV") 19-26-F through 19-29-F, issued on December 2, 2019. The Company has also attached a check in the amount of \$86,950.

Please feel free to contact me if you have questions regarding this matter.

Sincerely,



Robert C. Cain, II
Associate General Counsel

**WASHINGTON GAS LIGHT COMPANY'S RESPONSE TO
NOTICE OF PROBABLE VIOLATIONS 19-20-D thru 19-24-D and 19-25-F**

Pursuant to 15 DCMR § 2312.2, Washington Gas Light Company ("Washington Gas" or "Company") hereby submits its responses to Notices of Probable Violations ("NOPV") issued on December 2, 2019. Specifically, Washington Gas does not dispute NOPVs 19-26-F, 19-27-F, and 19-28-F. The Company has enclosed a check in the amount of \$86,950.

Washington Gas contests **NOPV 19-29-F** and contends that the facts underlying that NOPV fail to assert the Company committed an actionable violation. The Washington Gas O&M Section 5288 states: "Compaction layers shall not exceed 6 inches in depth under paved roads." Compaction layers refer to compacted material used as padding for the pipe. Compaction layers are sometimes called "lifts." The Washington Gas O&M therefore requires that the compaction layer have a thickness of 6 inches or less *after* compaction. Through compaction of a layer of padding material, the crew typically reduces its thickness. The initial, pre-compaction thickness is not relevant to the O&M standard; instead, the O&M standard applies to the post-compaction thickness of that layer. If a crew finds it is not able to sufficiently compact a layer to the required 6 inches for roadway locations, the crew must remove material and compact until the compaction layer reaches no more than a maximum of 6 inches in thickness.

Therefore, the Washington Gas contracting crew that was inspected by the Commission pipeline safety inspectors on June 11, 2019 did not violate the O&M because the crew did not have the opportunity to compact the padding to 6 inches.

Washington Gas requests further consideration on this item based on an improved understanding of the O&M requirements. Thus, this NOPV 19-29-F should be withdrawn and dismissed as a violation against the Company.

Respectfully submitted,



Robert C. Cain, II
Associate General Counsel
WASHINGTON GAS LIGHT COMPANY
1000 Maine Avenue, SW, Suite 700
Washington, D.C. 20024
(202) 624-6066


Dated: January 24, 2020

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 24th day of January 2020, I caused a copy of the foregoing document to be hand-delivered, mailed, postage-prepaid, or electronically-delivered, to the following:

Milena Yordanova, Esquire
Public Service Commission
of the District of Columbia
1325 "G" Street, NW, 8th Floor
Washington, DC 20005
myordanova@psc.dc.gov

Sandra Mattavous-Frye, Esquire
People's Counsel Office of the People's Counsel
for the District of Columbia
Suite 500, 1133 – 15th Street, NW
Washington, DC 20005-2710
smfrye@opc-dc.gov



ROBERT C. CAIN, II