

June 5, 2020

Susan Stevens Miller, Esquire  
Earthjustice  
1001 G Street, NW, Ste. 1000  
Washington, DC 20001

**Re: Formal Case No. 1154  
[Washington Gas's Notice of Objection to Sierra Club DR No. 1]**

Dear Ms. Miller:

Washington Gas Light Company hereby submits its Notice of Objection to Sierra Club's Data Request No. 1 in the above referenced proceeding.

If you have questions regarding this matter, feel free to contact me.

Sincerely,



Cathy Thurston-Seignious  
Supervisor, Administrative and  
Associate General Counsel

cc: Per Certificate of Service  
Brinda Westbrook-Sedgwick, Commission Secretary

PUBLIC SERVICE COMMISSION OF THE DISTRICT OF COLUMBIA

WASHINGTON GAS LIGHT COMPANY

FORMAL CASE NO. 1154

WASHINGTON GAS COMPANY RESPONSE  
AND/OR NOTICE OF OBJECTION/UNAVAILABILITY DIRECTED TO  
THE SIERRA CLUB

SIERRA CLUB

QUESTION NO. 1-3

- Q.** Please provide any and all analyses and forecasts of WGL's projected gas sales prepared in the past three years, with and without Projectpipes1 and/or Projectpipes2 leak repairs. Please provide all related workpapers in their native electronic format with formulas intact.

**WASHINGTON GAS'S OBJECTION**

**06/05/2020**

Washington Gas objects to this request on the grounds that it seeks information that is irrelevant to this proceeding. Projected gas sales are not factored into the Company's assessment of pipe replacements. Rather, the Company prioritizes pipe replacements based on leak assessments of its piping infrastructure to enhance the safety of its system. Notwithstanding this objection, the Company will provide information on forecasted meters in the District of Columbia.

## **CERTIFICATE OF SERVICE**

I, the undersigned counsel, hereby certify that on this 5th day of June 2020, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

Sanford Speight, Esquire  
Public Service Commission  
of the District of Columbia  
1325 "G" Street, NW, 8<sup>th</sup> Floor  
Washington, DC 20005  
[sspeight@psc.dc.gov](mailto:sspeight@psc.dc.gov)

Thaddeus Johnson, Esquire  
Office of the People's Counsel  
of the District of Columbia  
1133 - 15<sup>th</sup> Street, NW, Suite 500  
Washington, DC 20005  
[tjohnson@opc-dc.gov](mailto:tjohnson@opc-dc.gov)

Frann G. Francis, Esquire  
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Association of Metro. Washington  
Suite 300, 1050 - 17<sup>th</sup> Street, NW  
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[ffrancis@aoba-metro.org](mailto:ffrancis@aoba-metro.org)

Nina Dodge  
DC Climate Action  
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Brian Caldwell, Esquire  
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441 4<sup>th</sup> Street, NW, Suite 600-S  
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Susan Stevens Miller, Esquire  
Earthjustice  
1001 G Street, NW, Ste. 1000  
Washington, DC 20001  
[smiller@earthjustice.org](mailto:smiller@earthjustice.org)

A handwritten signature in blue ink, appearing to read "Cathy Thurston-Seignious", with a long horizontal flourish extending to the right.

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CATHY THURSTON-SEIGNIOUS