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June 10, 2020

VIA ELECTRONIC FILING

PUBLIC

Brinda Westbrook-Sedgwick
Commission Secretary
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
[Request for Stay of Enforcement During COVID-19]**

Dear Ms. Westbrook-Sedgwick:

Washington Gas Light Company hereby submits its Request for Stay of Enforcement During COVID-19.

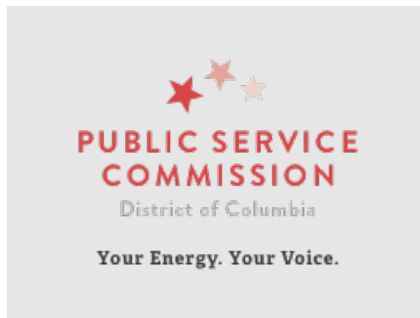
Please feel free to contact me if you have questions regarding this matter.

Sincerely,

Robert C. Cain, II

Robert C. Cain, II
Associate General Counsel

cc: Per Certificate of Service



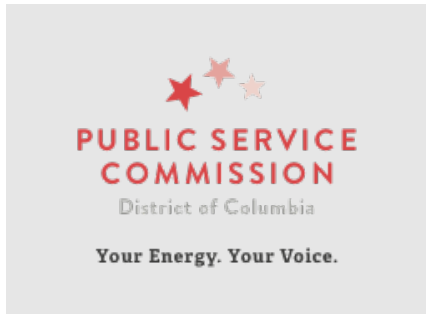
Office of Compliance and Enforcement

Request for Stay of Enforcement Form

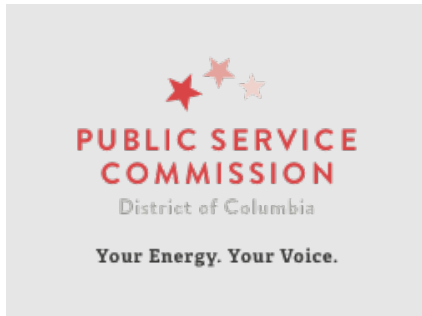
<p>Scope: This form is only applicable during the COVID-19 National Emergency. A stay of enforcement applies to situations where regulatory compliance or scheduled inspection dates are not feasible under the circumstances and the Gas Pipeline Operator (“Operator”) has requested a stay of enforcement in advance. Please be advised that activities related to unapproved requests may be considered non-compliant and subject to enforcement.</p>	<p>Instructions: If an Operator cannot meet the federal or state safety compliance regulations and codes or scheduled inspection dates due to COVID-19, the Operator must document the specific details using this form to request a stay of enforcement. This form must be submitted in Microsoft Word format and shall be emailed by an authorized representative to uogbue@psc.dc.gov; abagayoko@psc.dc.gov; and djackson@psc.dc.gov. A copy of the emailed form and associated documents, if any, shall also be filed with the Commission. All communication shall be directed to:</p> <p style="padding-left: 20px;">Udeozo Ogbue, P.Eng., DBM Chief, Office of Compliance and Enforcement Program Manager, Pipeline Safety and Damage Prevention</p> <p>The operator must submit each request(s) at least 48 hours prior to the start date of the intended non-compliant activity. For operator qualifications matters, the operator must notify the Office of Compliance and Enforcement as soon as possible but no later than five business days prior to the date of the intended non-compliant activity. Commission staff may require additional information related to the Operator’s request.</p>
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Information Below To Be Provided By The Operator

Operator Name:	Washington Gas
Date:	4/29/2020 5/21/2020
Requester’s name and title:	Shannon Maloney – Manager, DOT Pipeline Safety & Compliance
Requester’s phone number:	(703) 750-5558
Requested start and end dates of enforcement stay:	4/29/2020 to 12/31/2020 5/21/2020 to 9/30/2020
Email addresses of operator representatives copied on decision:	sprice@washgas.com ; kristopherkelley@washgas.com
49 C.F.R. 190 - 199 Regulation No. & Description (N/A, If Not Applicable):	§192.723(b)(2)
15 DCMR Regulation or Commission Order (N/A, If Not Applicable):	
What specific regulatory requirements or engineering inspection dates cannot be met?	A number of inside meter sets are unable to be surveyed within 5 years, not to exceed 63 months requirement of the previous survey.
How is the request related to COVID-19?	Public concern relative to the spread of COVID-19 has caused customers and apartment building management companies with inside meters to deny access to Washington Gas to



	<p>complete meter inspections where access inside their units are required. In March 2020, Washington Gas temporarily suspended scheduling this type of premise work to reduce risk to the health of employees and customers. For example, building management of both the [REDACTED] both canceled previously scheduled appointments for inspections because of concerns related to COVID-19.</p>
<p>List the risks the non-compliant actions are introducing to the Operator’s natural gas pipeline system?</p>	<p>No measurable pipeline safety risks with the temporary delay in the inspection.</p>
<p>What alternative measures are being taken to ensure safety and mitigate the risks listed above? (N/A, If Not Applicable)</p>	<p>Washington Gas continues to respond to emergency calls, including reports of inside gas odor. Technicians responding to emergency calls are equipped with proper PPE and procedures to minimize risk associated with COVID-19. Technicians responding to emergency calls have access to the PPE and supplies required for their jobs, including but not limited to face masks, gloves, disinfectant, etc. Specifically, technicians are provided procedures including the following: “Operations JHA -Revision 2,” “Field Guide Job Aid for Premise Facing Work – Revision 2,” “Disinfecting Tools and Equipment Procedure,” and “Customer Leave-Behind Letter.”</p>
<p>How will the request be abated after cessation of the national emergency?</p>	<p>Washington Gas will continue to monitor the direction provided by the local authorities. Once restrictions and stay-at-home orders are lifted, Washington Gas intends to resume scheduling inside meter set inspections affected by this request. Given the current conditions and uncertainty about when Washington Gas will be able to resume its normal schedule for inspections and surveys of inside facilities, Washington Gas respectfully requests an extension of time, beyond the five-year cycle mandated by §192.723(b)(2) to complete the inspections. Specifically, Washington Gas requests a six three-month extension to complete all inside meter set inspections and surveys due in 2020. Washington Gas currently intends to resume these surveys no later than during July 2020 and will temporarily increase the number of qualified staff conducting these surveys, once they resume.</p>
<p>List of attachments with further details accompanying this request. If the attachments contain confidential information, please provide a</p>	<p>The table below shows the number of complexes and units at each complex that are affected by the potential relaxation of the 5-year inspection interval.</p>



public and confidential version. (N/A, If Not Applicable):	<p>A separate file is being sent alongside this form and contains the following information:</p> <ul style="list-style-type: none"> • Name and address of each complex • Number of affected units for each complex • Last leak survey date • Service line operating pressure • Meter location within the complex/building
Information Below To Be Provided By The State Program Manager	
Request Tracking Number:	
Date Received:	
Date of Decision:	
Additional Information Needed:	
Decision:	
Person deciding the matter:	
Comments:	

Number of Complexes and Units Due by Month (District of Columbia)

	Complexes	# Units
May 2020	8	144
June 2020	3	238
July 2020	0	0
August 2020	0	0
<p>Note: One (1) additional complex is due for inspection in September 2020. The total number of complexes affected between May and the end of September is 12.</p>		

COMPLEX	ADDRESS	Service Information	Number Units	Last Leak Survey Date	Pressure	Meter Location
		Pla HP (77)	29	2/20/2015	20	HALLWAY CLOSET
		2" Pla HP (05)	12	2/4/2015	20	BASEMENT
		4" Pla HP (94)	24	3/9/2015	20	BASEMENT CLOSET
		2" W/S (66) 2" Pla HP (90)	71	3/9/2015	20	UTILITY CLOSET IN UNIT
		1.25" Pla HP (99)	5	2/6/2015	20	OUTSIDE CLOSET/UTILITY CLOSET IN UNIT
		2" Pla HP (93)	8	2/27/2015	20	UTILITY CLOSET IN UNIT
		2" Pla HP (01)	6	2/13/2015	20	HALLWAY CLOSET
		2" Pla HP (99)	47	2/23/2015	20	CLOSET IN UNIT
		3/4" Pla HP (98)	11	2/21/2015	20	IN GARAGE
		4" Pla HP (99)	143	3/13/2015	20	UTILITY CLOSET IN UNIT
		3/4" Pla HP (06)	26	2/23/2015	20	HALLWAY CLOSET
		.75 W/S HP (64) .75 Pla HP (95)	44	6/16/2015	20	CLOSET IN UNIT

CERTIFICATE OF SERVICE

I, the undersigned counsel, hereby certify that on this 10th day of June 2020, I caused copies of the foregoing to be hand-delivered, mailed, postage-prepaid, or electronically delivered to the following:

Christopher Lipscombe, Esquire
Milena Yordanova, Esquire
Udeozo Ogbue
Donald Jackson
Ahmadou Bagayoko
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